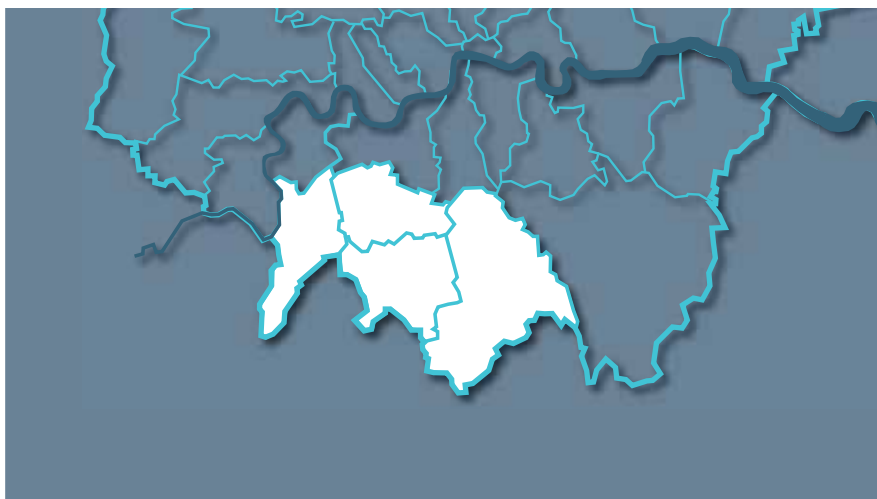


- L B Croydon
- R B Kingston
- L B Merton
- L B Sutton



# South London Waste Plan



Sustainability Appraisal (SA)  
incorporating Strategic Environmental Assessment (SEA)  
Scoping Report

September 2019



# **South London Waste Plan 2021-36**

**Sustainability Appraisal incorporating Strategic  
Environmental Assessment (SEA)**

## **Scoping Report**

September 2019



|   | <b>Page</b> |
|---|-------------|
| <b>Contents</b>   |             |
| <b>ONE</b>  |             |
| <b>Introduction</b>   | <b>1</b>    |
| Purpose of the new South London Waste Plan  | 1           |
| <i>Figure 1.1 Map of the South London Waste Plan area</i>   | 1           |
| National planning policy requirements   | 1           |
| <i>Figure 1.2: The Waste Hierarchy</i>  | 2           |
| Apportionment targets   | 3           |
| <i>Table 1.1: Apportionment targets in the Draft London Plan 2017</i>   | 3           |
| Requirement for sustainability appraisal  | 3           |
| What is sustainable development?  | 3           |
| Purpose of sustainability appraisal (SA)  | 4           |
| Equalities impact assessment (EqIA)   | 5           |
| Habitats Regulations Assessment (Appropriate Assessment)  | 5           |
| Coverage of SA scoping report   | 6           |
| Consultation period   | 6           |
| <b>TWO</b>  |             |
| <b>Background to the South London Waste Plan</b>  | <b>7</b>    |
| Current arrangements for waste collection and disposal  | 7           |
| South London Waste Partnership  | 7           |
| South London Waste Partnership  | 7           |
| The current South London Waste Plan 2012  | 8           |
| <i>Table 2.1: Combined Apportionments for the SLWP area</i>   | 8           |
| The new South London Waste Plan 2021-36   | 9           |
| <i>Table 2.2: Timetable for preparing the new SLWP</i>  | 9           |
| <b>THREE</b>  |             |
| <b>Current Waste Arisings and Capacity in South London</b>  | <b>11</b>   |
| Evidence gathering  | 11          |
| Waste arisings and forecasts for apportioned waste  | 12          |
| <i>Table 3.1: Combined Apportionments for the SLWP area</i>   | 12          |
| Arisings and forecasts of other waste types   | 12          |
| <i>Table 3.2: Forecast CD&amp;E waste arisings for the SLWP area</i>  | 12          |
| <i>Table 3.3: Hazardous waste arisings in the SLWP area</i>   | 14          |
| Waste exports and imports   | 14          |
| Existing waste management sites and areas   | 15          |
| <i>Table 3.4 Sites Counting Towards the Apportionment</i>   | 15          |
| Waste capacity assessment   | 17          |
| <i>Table 3.5 Management capacity for household and C&amp;I (apportionment) waste, apportionment targets and capacity for the SLWP area from 2021-36</i> | 18          |
| <i>Table 3.6: Management capacity for C&amp;D waste, arisings and capacity for the SLWP area from 2021 to 2036</i>                                      | 18          |
| <i>Table 3.7: Overall capacity gap for the SLWP area 2021 to 2036</i>   | 19          |
| Comparison of the capacity gaps and potential new capacity  | 19          |
| <i>Table 3.8: Summary of waste capacity gaps in the SLWP area 2021 to 2036</i>  | 19          |
| <b>FOUR</b>   |             |
| <b>Sustainability Appraisal and Strategic Environmental Assessment</b>  | <b>21</b>   |
| Government guidance and best practice   | 21          |
| Main Stages of Appraisal  | 21          |
| Key Outputs of Appraisal  | 23          |
| <i>Figure 4.1: Main Stages of SA in relation to the DPD Process</i>   | 23          |
| <i>Table 4.1: Key Outputs of the SA process</i>   | 24          |
| Equalities Impact Assessment  | 24          |
| Habitats Regulations Assessment (HRA)   | 25          |

|             |   |           |
|-------------|---|-----------|
| <b>FIVE</b> | <b>Other Relevant Plans, Programmes and Sustainability Objectives (Task A1)</b>     | <b>27</b> |
|             | Policy review   | 27        |
|             | European context  | 27        |
|             | National context  | 28        |
|             | <i>Figure 5.1 The waste hierarchy.</i>  | 29        |
|             | London Context  | 31        |
|             | <i>Table 5.1. London Plan 2016 apportionment targets for South London</i>           | 31        |
|             | <i>Table 5.2. Draft new London Plan 2017 apportionment targets for South London</i> | 32        |
|             | Local Context   | 34        |
| <br>        |   |           |
| <b>SIX</b>  | <b>Baseline (Task A2)</b>   | <b>37</b> |
|             | What is baseline information?   | 37        |
|             | The Plan Area   | 37        |
|             | London Borough of Croydon   | 39        |
|             | Royal Borough of Kingston-Upon-Thames   | 39        |
|             | London Borough of Merton  | 40        |
|             | London Borough of Sutton  | 40        |
|             | <br>  |           |
|             | POPULATION  | 41        |
|             | Resident population   | 41        |
|             | Components of population change 2017 to 2018  | 41        |
|             | Population projections  | 42        |
|             | Population structure  | 43        |
|             | Projected Change in Population Structure  | 44        |
|             | Population density  | 45        |
|             | Ethnicity   |           |
|             | Religion  | 46        |
|             | Household growth  | 46        |
|             | Household projections 2021-36   | 46        |
|             | Housing tenure by household   | 47        |
|             | Car ownership   | 47        |
|             | Social deprivation  | 47        |
|             | Fuel Poverty  | 48        |
|             | <br>  |           |
|             | ECONOMY   | 49        |
|             | Economic activity   | 49        |
|             | Employment by occupation - economically active residents aged 16-64                 | 49        |
|             | Job Density   | 50        |
|             | Employment projections  | 50        |
|             | Unemployment  | 51        |
|             | Employment sites  | 51        |
|             | Occupancy of industrial land  | 52        |
|             | Projected change in industrial floorspace   | 53        |
|             | Projected land demand for industrial and warehousing uses                           | 54        |
|             | Projected land demand for apportioned waste as of 2016                              | 54        |
|             | Release of industrial land to other uses  | 54        |
|             | Borough classifications for the management of industrial floorspace capacity        | 55        |
|             | Town Centre Network   | 56        |
|             | <br>  |           |
|             | ENVIRONMENT   | 57        |
|             | Traffic growth and congestion   | 57        |
|             | Modal share   | 58        |
|             | Road casualties   | 58        |
|             | Road Network  | 58        |
|             | Highway asset condition   | 59        |
|             | Air Quality   | 59        |
|             | Noise exposure  | 63        |
|             | Carbon dioxide (CO <sub>2</sub> ) emissions   | 64        |

|  |   |            |
|--|---|------------|
|  | Climate change  | 65         |
|  | Household waste recycling rate  | 66         |
|  | Flood Risk  | 67         |
|  | Sites of Importance for Nature Conservation (SINCs)                             | 75         |
|  | Species, habitats and ancient woodland  | 75         |
|  | Green Belt and Metropolitan Open Land   | 75         |
|  | Open Space  | 75         |
|  | Green Infrastructure  | 76         |
|  | Conservation Areas and Historic Environment                                     | 76         |
| <b>SEVEN</b>   | <b>Key Sustainability Issues and Problems (Task A3)</b>                         | <b>77</b>  |
|  | Identifying Key Sustainability Issues and Problems                              | 77         |
|  | Issue 1: Sustainable Waste Management: Self-Sufficiency                         | 77         |
|  | Issue 2: Sustainable Waste Management: Spatial Strategy & Strategic Approach    | 78         |
|  | Issue 3: Sustainable Waste Management: Prevention, re-use, recycling & recovery | 79         |
|  | Issue 4: Sustainable Waste Management: Promoting the Circular Economy           | 79         |
|  | Issue 5: Climate Change Mitigation  | 79         |
|  | Issue 6: Climate Change Adaptation  | 80         |
|  | Issue 7: Flood risk, sustainable drainage (SuDS) and water resources            | 80         |
|  | Issue 8: Sustainable design and construction                                    | 81         |
|  | Issue 9: Transport  | 781        |
|  | Issue 10: Air Quality   | 82         |
|  | Issue 11: Environmental protection  | 82         |
|  | Issue 12: Biodiversity and Habitats   | 83         |
|  | Issue 13: Local Economy and Employment  | 83         |
|  | Issue 14: Townscape and visual amenity  | 84         |
|  | Issue 15: Human health and quality of life                                      | 85         |
|  | Issue 16: Equalities, Accessibility and Social Inclusion                        | 85         |
| <b>EIGHT</b>   | <b>The Sustainability Appraisal Framework (Task A4)</b>                         | <b>87</b>  |
|  | Developing Sustainability Objectives, Indicators and Targets                    | 87         |
|  | Scoring System  | 87         |
|  | Plan Monitoring   |            |
| <b>PROPOSED SA FRAMEWORK FOR SOUTH LONDON WASTE PLAN 89-98</b> |   |            |
| <b>NINE</b>  | <b>Consulting on the Scope of the Sustainability Appraisal (Task A4)</b>        | <b>99</b>  |
|  | Consultation Arrangements   | 99         |
|  | Next Steps  | 100        |
| <b>APPENDICES</b>  |   | <b>101</b> |
| Appendix 1:  | Glossary  | 101        |
| Appendix 2:  | Proposed Equalities Impact Assessment (EqIA) criteria                           | 105-108    |





# 1 INTRODUCTION

## Purpose of the new South London Waste Plan

**1.1** The London boroughs of Croydon, Kingston, Merton and Sutton are preparing a new South London Waste Plan (SLWP) covering the time period 2021-36. When it is adopted in 2021-22, the new plan will replace the current SLWP 2011-21<sup>1</sup> introduced in 2012.

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

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

**1.3** Figure 1.1. shows the geographical coverage of the four partner boroughs.

**Figure 1.1: The South London Waste Plan area**



## National planning policy requirements

**1.4** The National Planning Policy for Waste<sup>2</sup> (NPPW) (DCLG, 2015) requires local planning authorities to prepare local plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams by:

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

<sup>2</sup> the NPPW is available at

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/364759/141015\\_National\\_Planning\\_Policy\\_for\\_Waste.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

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

**Figure 1.2: The Waste Hierarchy**



## Apportionment targets

**1.5** The draft London Plan (GLA, December 2017)<sup>3</sup> with minor suggested changes (July 2018) and further suggested changes (March 2019) includes the following targets for waste which reflect those set out in the Mayor's Environment Strategy (GLA, 2018):

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

<sup>3</sup> the draft London Plan 2017 is available at <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan>

- 95% reuse/recycling/recovery of construction and demolition waste; and
- 95% beneficial use of excavation waste.

**1.6** New apportionment targets are set for each borough in order to meet the net self-sufficiency target for local authority collected waste (LACW) and for commercial and industrial (C&I) waste. Table 1.1 sets out the combined apportionment targets for South London for 2021 and at the end of the plan period in 2041.

**Table 1.1: Apportionment targets for South London in the Draft London Plan 2017**

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

## Requirement for Sustainability Appraisal

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

## What is sustainable development?

**1.8** The UK Sustainable Development Strategy (ODPM<sup>4</sup>, 2005) defines sustainable development as “enabling all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations”. The Strategy is based on the following guiding principles:

### (1) Living within Environmental Limits

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

### (2) Ensuring a Strong, Healthy and Just Society

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

### (3) Achieving a Sustainable Economy

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

<sup>4</sup> the former Office for the Deputy Prime Minister

#### **(4) Using Sound Science Responsibly**

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

#### **(5) Promoting Good Governance**

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

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

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

### **Purpose of sustainability appraisal**

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

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

**1.12** To be effective, SA must be

- **Inclusive:** ensuring early and on-going involvement of the public, statutory bodies and other relevant stakeholders at the appropriate stages of plan preparation;
- **Objectives-led:** the direction of desired change has measurable targets;

- **Evidence-based:** including relevant baseline information against which the potential effects of the plan and policy options can be measured and assessed;
- **Useful:** providing clear conclusions and recommendations on how the plan can be made more sustainable and proposals for future monitoring.

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

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

## **Equalities Impact Assessment**

**1.15** The purpose of Equalities Impact Assessment (EqIA) is to help public bodies identify potential sources of discrimination against specific equalities groups arising from their policies or operations and take appropriate steps to address them. EqIAs have their origin in the Macpherson Enquiry into the Metropolitan Police and the subsequent Race Relations Act 2000. Further legislation extended the scope of EqIAs to address disability and gender equalities alongside racial discrimination issues. Although the subsequent Equality Act 2010 removed the formal requirement for public bodies in England to undertake or publish a detailed EqIA of their policies, practices and decisions (including Local Plans) from April 2011, local authorities still have a legal duty to “give due regard” to avoiding discrimination and promoting equality of opportunity for all protected groups when making policy decisions and to demonstrate how they are complying with this duty.

**1.16** Since many of the issues to be addressed as part of the wider plan appraisal process will inevitably overlap with the consideration of potential impacts upon equalities groups, it is proposed to integrate the requirements of EqIA as part of the SA.

## **Habitats Regulations Assessment (Appropriate Assessment)**

**1.17** The need for habitats regulations assessment<sup>5</sup> (HRA) originates from the EU Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (known as the ‘Habitats Directive’) as set out in the Conservation of Habitats and Species Regulations 2010 (as amended). The Regulations seek to safeguard designated European sites within the UK, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites and sites of special scientific interest (SSSIs), and therefore protect the habitats and species listed in the Annexes of the Directive.

**1.18** Under the Regulations, local planning authorities must undertake an HRA in line with the Habitats Directive where a plan or project is likely to have a ‘significant effect’ upon a European site, either individually or in combination with other projects. The outcome of habitats regulations screening will be provided as part of the next SA/SEA Report on SLWP Issues and Preferred Options which will be published for consultation from 31 October to 22 December 2019

---

<sup>5</sup> HRA is also referred to as ‘Appropriate Assessment’

## Coverage of SA Scoping Report

**1.19** This document is the SA Scoping Report (incorporating SEA and EqIA) for the new SLWP. Its purpose is to define the scope of the appraisal and provide the basis for appraising the effects of alternative waste management sites and planning policies against a range of environmental, social and economic objectives:

- **Section 2** describes the background to the new **South London Waste Plan (SLWP)** in terms of current and future waste arisings within the plan area, and existing and potential waste management sites across the four borough drawing upon updated evidence set out in the ‘South London Waste Technical Paper’ prepared by Anthesis consultants on behalf of the four boroughs in June 2019;
- **Section 3** provides a review of **Current Waste Arisings and Capacity in South London**;
- **Section 4** outlines the main stages of **Sustainability Appraisal and Strategic Environmental Assessment** drawing upon government guidance and best practice;
- **Section 5** reviews other **Relevant Plans, Programmes and Sustainability Objectives** at the national, regional and local levels (**Task A1**)<sup>6</sup>;
- **Section 6** sets out **Baseline** information for South London, in terms of the key social economic and environmental trends likely to be influenced by the plan (**Task A2**);
- **Section 7** identifies the key **Sustainability Issues** to be addressed by the SLWP (**Task A3**);
- **Section 8** sets out the proposed **Sustainability Appraisal Framework** consisting of the key sustainability objectives, indicators and targets against which the likely effects of the Plan and alternative options will be appraised (**Task A4**); and
- **Section 9** describes the arrangements for **Consulting on the Scope of the Sustainability Appraisal (Task A5)**.

## Consultation period

**1.20** In order to meet the requirements of the SEA Directive and procedures for community engagement on local plan and SA documents set out in the respective Statements of Community Involvement (SCI) published by the four boroughs, the SA Scoping Report is being published over a five week period from **16 September until 21 October 2019** (17:00). in order to seek the views of relevant bodies, including the Environment Agency (EA), Natural England and Historic England, as on the proposed scope of the appraisal.

**1.21** Further details of consultation arrangements are provided in Section 9.

---

<sup>6</sup> in line with best practice, a comprehensive scoping table will be provided as part of the next SA/SEA Report on SLWP Issues and Preferred Options which will be published for public consultation from 31 October to 22 December 2019

## 2 BACKGROUND TO THE SOUTH LONDON WASTE PLAN

---

### Current arrangements for waste collection and disposal

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

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

**2.3** Each borough's function as a waste planning authority is outlined in National Planning Policy for Waste<sup>7</sup> (NPPW) (DCLG, 2015) which requires that waste planning authorities identify sufficient sites to accommodate both municipal solid waste (MSW) arisings, which is related to the collection and disposal function, and commercial and industrial waste arisings identified in the regional spatial strategy (i.e. the London Plan 2016). This is the purpose of the South London Waste Plan.

### South London Waste Partnership

**2.4** There are many advantages to joint working on a sub-regional level. Waste arisings rarely remain within individual borough boundaries and joint working can also achieve financial savings for individual boroughs. Accordingly, the four South London boroughs of Croydon, Merton, Sutton and Kingston-upon-Thames formed the South London Waste Partnership (SLWP) in order to jointly procure waste treatment and disposal contracts for municipal waste. As the disposal authority for household waste collected by the four South London Boroughs, the SLWP adopted a joint Municipal Waste Management Strategy<sup>8</sup> (JMWMS) for South London in 2011 covering the period 2010-20 with the aims of:

- minimising the climate change impact of managing municipal solid waste (MSW) through effective and efficient diversion from landfill;
- working at a sub-regional level to deliver cost effective and environmentally sound waste management services; and
- working towards conformity with the Waste Strategy for England 2007<sup>9</sup> and the London Municipal Waste Management Strategy.

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

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

---

<sup>7</sup> the NPPW is available at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/364759/141015\\_National\\_Planning\\_Policy\\_for\\_Waste.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

<sup>8</sup> the JMWMS 2010-20 is available at <http://www.slwp.org.uk/wp-content/uploads/2011/03/Waste-Strategy-FINAL.pdf>

<sup>9</sup> the Waste Strategy for England 2007 is available at <https://www.gov.uk/government/publications/waste-strategy-for-england-2007>

## The current South London Waste Plan 2012

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

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

| Year                     | Combined municipal (MSW) and Commercial & Industrial (C&I) waste apportionment |
|--------------------------|--|
| <b>2010</b>              | 854,000 tonnes   |
| <b>2015</b>              | 1,130,000 tonnes   |
| <b>2020</b>              | 1,332,000 tonnes   |
| <b>2021<sup>10</sup></b> | 1,326,000 tonnes   |

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

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

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

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

**2.12** Since the adoption of the SLWP in 2012, the four partner boroughs have monitored performance against the above targets through the publication of an Annual Monitoring Report (AMR). Section 3 of this document provides a detailed review of current and future waste arisings within the plan area, and existing and potential waste management sites

<sup>10</sup> the London Plan 2011 provided an apportionment to 2020. The 2021 apportionment was based on London's continuing 85% self-sufficiency and maintaining the Plan area's contribution to this.



across the four borough drawing upon updated evidence set out in the Technical Paper prepared by Anthesis consultants on behalf of the four boroughs in June 2019.

**2.13** The SLWP plan period is now coming to an end and a new waste plan is required in order to meet the Mayor’s updated apportionment targets from 2021 to 2041 in the draft London Plan (GLA, December 2017) and a range of other sustainable waste management targets set out in the Mayor’s Environment Strategy (GLA, 2018).

## The new South London Waste Plan 2021-36

**2.14** The proposed timescale for the preparation of the new SLWP 2021-36 is set out below in Table 2.2:

**Table 2.2: Timetable for preparing and consulting on the new South London Waste Plan**

| Plan-making stage  | Timescale                    |
|--|------------------------------|
| Evidence gathering   | October 2018 onwards         |
| Consultation with relevant bodies on SA Scoping Report (this document) | 16 September-21 October 2019 |
| Public consultation on SLWP Issues and Preferred Options               | 31 October-22 December 2019  |
| Public consultation on the proposed Submission Draft                   | May 2020                     |
| Submission of the new SLWP to Secretary of State                       | August 2020                  |
| Examination in Public  | January 2021                 |
| Inspector’s Report   | March 2021                   |
| Adoption   | July 2021                    |

**2.15** The Issues and Options document, which is now being prepared for public consultation throughout the plan area in October 2019, will explore the following key aspects that the Plan will need to address:

- **Issue 1:** The Vision and Objectives of the new South London Waste Plan
- **Issue 2:** Self sufficiency - how much of our waste should we deal with?
- **Issue 3:** Distribution of waste management sites
- **Issue 4:** The need for new and/or intensified waste management facilities
- **Issue 5:** Where should the new facilities be located?
- **Issue 6:** How can the new plan promote the circular economy in south London?
- **Issue 7:** How can the new plan address climate change and minimise impacts
- **Issue 8:** Implementing the Plan.

**2.16** The key sustainability issues identified in this document will help to shape the strategic choices, potential waste management sites/ broad locations and revised site criteria to be set out in the issues and options document.

**2.17** To inform consultation, a further SA Report will be prepared alongside the Issues and Preferred Options document in October 2008, to evaluate the possible implications of each potential site and policy option on the sustainability objectives, indicators targets making up the proposed SA Framework (see Section 8).



## 3 CURRENT WASTE ARISING AND CAPACITY IN SOUTH LONDON

---

### Evidence gathering

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

**3.2** The Technical Paper includes the following outputs:

#### Policy context

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

#### Waste arisings and forecasts for apportioned waste

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

#### Arisings and forecasts for other waste types

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

#### Waste capacity assessment for apportioned waste

- an assessment of current and future waste management capacity of waste sites/facilities in each of the partner boroughs as well as in the SLWP area as a whole, including apportionment criteria<sup>11</sup>; existing capacity for permitted and exempt waste sites; the 'capacity gap' between between apportionment targets and arisings of other waste types compared to the management capacity; and the likely land requirement to meet any shortfall (for each borough and collectively).

#### Sites and areas

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

#### Imports and exports

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

#### Conclusions and recommendations

- key conclusions and recommendations arising from the study.

---

<sup>11</sup> apportionment criteria are needed to determine what types of waste facility/operations should be counted as 'waste management' and therefore what waste streams should count towards the apportionment

## Waste arisings and forecasts for apportioned waste

**3.3** Table 3.1 shows the forecast apportioned waste to be managed over the plan period, consisting of Household and Commercial & Industrial (C&I) waste. While the existing London Plan breaks down the apportionment targets into Household and Commercial & Industrial (C&I) waste, the draft London Plan does not provide this breakdown.

**3.4** In order to assess whether there is sufficient waste management infrastructure within the SLWP area, the new apportionment figures in the draft London Plan have been used, rather than estimating actual arisings. The apportionment targets for each borough have then been used to calculate the targets for the intervening years between 2021 and 2041 and the figures for 2016 are taken from the existing London Plan.

**3.5** Three out of the four boroughs have been set apportionment targets higher than their anticipated waste arisings, with the exception of Croydon, which has actually been set a lower target. Collectively the apportionment is higher than the anticipated arisings.

**Table 3.1: Combined Apportionments for the SLWP area (tonnes per annum)**

|             | 2016           | 2021           | 2026           | 2031           | 2036           |
|-------------|----------------|----------------|----------------|----------------|----------------|
| Croydon     | 273,000        | 252,000        | 256,000        | 260,000        | 264,000        |
| Kingston    | 143,000        | 187,000        | 190,000        | 193,000        | 196,000        |
| Merton      | 161,000        | 238,000        | 241,750        | 245,500        | 249,250        |
| Sutton      | 155,000        | 210,000        | 213,500        | 217,000        | 220,500        |
| <b>SLWP</b> | <b>732,000</b> | <b>887,000</b> | <b>901,250</b> | <b>915,500</b> | <b>929,750</b> |

## Arisings and forecasts of other waste types

### Construction, Demolition & Excavation Waste Arisings

**3.6** Table 3.2 shows both the current and forecasted CD&E waste arisings within the plan area. Figures for 2017 are actuals taken from the Environment Agency's (EA) Waste Data Interrogator (WDI), and future arisings have been forecast using GLA's employment figures in the construction sector until 2036. These figures show an increase in CD&E waste arisings from 508kt in 2017 to 551kt by 2036.

**Table 3.2: Forecast CD&E waste arisings for the SLWP area (tonnes per annum)**

| Area     | Waste Source | Waste Type | 2017           | 2021           | 2026           | 2031           | 2036           |
|----------|--------------|------------|----------------|----------------|----------------|----------------|----------------|
| Croydon  | C&D          | Inert/C+D  | 282,613        | 292,593        | 294,629        | 300,542        | 304,303        |
|          |              | Hazardous  | 364            | 377            | 380            | 388            | 392            |
|          | Excavation   | Inert/C+D  | 53,198         | 55,077         | 55,460         | 56,573         | 57,281         |
|          |              | Hazardous  | 5,458          | 5,651          | 5,690          | 5,804          | 5,877          |
|          | <b>Total</b> |            | <b>341,634</b> | <b>353,698</b> | <b>356,158</b> | <b>363,307</b> | <b>367,853</b> |
| Kingston | C&D          | Inert/C+D  | 37,530         | 37,850         | 38,242         | 39,002         | 39,002         |
|          |              | Hazardous  | 36             | 37             | 37             | 38             | 38             |
|          | Excavation   | Inert/C+D  | 28,037         | 28,276         | 28,569         | 29,137         | 29,137         |
|          |              | Hazardous  | -              | -              | -              | -              | -              |
|          | <b>Total</b> |            | <b>65,604</b>  | <b>66,162</b>  | <b>66,848</b>  | <b>68,176</b>  | <b>68,176</b>  |

| Area        | Waste Source | Waste Type | 2017           | 2021           | 2026           | 2031           | 2036           |
|-------------|--------------|------------|----------------|----------------|----------------|----------------|----------------|
| Merton      | C&D          | Inert/C+D  | 46,243         | 47,956         | 50,051         | 52,081         | 54,016         |
|             |              | Hazardous  | 19             | 19             | 20             | 21             | 22             |
|             | Excavation   | Inert/C+D  | 27,047         | 28,048         | 29,274         | 30,461         | 31,593         |
|             |              | Hazardous  | 201            | 208            | 218            | 226            | 235            |
|             | <b>Total</b> |            | <b>73,510</b>  | <b>76,232</b>  | <b>79,563</b>  | <b>82,789</b>  | <b>85,865</b>  |
| Sutton      | C&D          | Inert/C+D  | 15,478         | 15,638         | 15,834         | 16,214         | 16,576         |
|             |              | Hazardous  | 29             | 29             | 30             | 30             | 31             |
|             | Excavation   | Inert/C+D  | 11,071         | 11,185         | 11,326         | 11,597         | 11,856         |
|             |              | Hazardous  | 576            | 582            | 589            | 603            | 617            |
|             | <b>Total</b> |            | <b>27,154</b>  | <b>27,434</b>  | <b>27,778</b>  | <b>28,445</b>  | <b>29,080</b>  |
| <b>SLWP</b> | C&D          | Inert/C+D  | 381,865        | 394,036        | 398,756        | 407,838        | 413,897        |
|             |              | Hazardous  | 448            | 463            | 467            | 477            | 483            |
|             | Excavation   | Inert/C+D  | 119,353        | 122,586        | 124,628        | 127,768        | 129,867        |
|             |              | Hazardous  | 6,235          | 6,441          | 6,497          | 6,634          | 6,729          |
|             | <b>Total</b> |            | <b>507,901</b> | <b>523,526</b> | <b>530,348</b> | <b>542,717</b> | <b>550,975</b> |

#### Low Level Radioactive Waste

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

#### Agricultural Waste

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

#### Hazardous Waste

**3.9** Table 3.3 shows that hazardous waste arisings within the plan area are predicted to increase from 20.2 ktpa in 2017 to around 21.6 ktpa by 2036 based on the EA's Hazardous Waste Data Interrogator (WD). Future hazardous waste arisings have been forecast using anticipated growth rates in the GLA's draft London Plan and forecast C&I waste arisings. However, these tonnages are already included in the household and C&I waste apportionment and in forecasted CD&E waste arisings.

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

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

### Wastewater

**3.10** Thames Water is responsible for wastewater and sewage sludge treatment in London and manages sewerage infrastructure as well as sewage treatment works. Wastewater quantities are expected to increase from 52.9 million m<sup>3</sup>/yr to 55.7 million m<sup>3</sup>/yr.

**3.11** The four boroughs are served across Beddington (LB Sutton), Crossness (LB Bexley), Hogsmill (RB Kingston) and Long Reach (Dartford BC) sewage treatment works (STW). Thames Water have confirmed that these facilities all have adequate capacity to manage the incoming sewage and have all had major capacity increases since 2010<sup>12</sup>.

### **Waste exports and imports**

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

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

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

<sup>12</sup> details of STW capacity increases in recent years are set out in the Thames Water Asset Management Plans for 2010-15 (AMP5) and for 2015-20 (AMP6)

## Existing waste management sites and areas

**3.15** As part of the evidence base for the new plan, a comprehensive analysis has been undertaken for all operational waste management sites in south London. Detailed site profiles are set out in Appendix 4 of the Technical Paper, including address details, location maps, operator, type of facility, maximum throughput, licensed capacity, type of waste accepted, management type (by reference to the waste hierarchy), nature and scale of the facility and planning constraints.

**3.16** Table 3.4 provides a breakdown of existing waste management capacity for all site sites which are currently contributing towards the London Plan 2016 apportionment for household and C&I waste. Where relevant, opportunities to increase capacity have also been identified in order to meet the capacity gaps identified above in Tables 3.4 to 3.6. These opportunities include intensifying the throughput of existing operations and identifying vacant sites which could be redeveloped for waste uses.

**3.17** In addition, waste facilities in the planning pipeline were identified which, if given planning permission, would also contribute towards the shortfall in waste management capacity.

**Table 3.4 Sites Counting Towards the Apportionment and C&D Target**

| Ref             | Name                                  | Household/C&I (tpa) | C&D (tpa)     | Potential for Intensification |
|-----------------|---------------------------------------|---------------------|---------------|-------------------------------|
| <b>Croydon</b>  |                                       |                     |               |                               |
| C1              | Able Waste Services                   | 0                   | 43,268        |                               |
| C2              | Croydon Car Spares                    | 241                 | 0             |                               |
| C3              | Curley Skip Hire                      | 0                   | 0             |                               |
| C4              | Days Aggregates Purley Depot          | 0                   | 0             |                               |
| C5              | Factory Lane Waste Transfer Station   | 9,623               | 5,206         | Yes                           |
| C6              | Fishers Farm Reuse & Recycling Centre | 4,542               | 0             |                               |
| C7              | Henry Woods Waste Management          | 0                   | 0             |                               |
| C8              | New Era Materials                     | 4,213               | 0             |                               |
| C9              | Peartree Farm                         | 0                   | 0             |                               |
| C10             | Purley Oaks Civic Amenity Site        | 6,684               | 0             |                               |
| C11             | Safety Kleen                          | 0                   | 0             | Yes                           |
| C12             | Stubbs Mead Depot                     | 0                   | 0             | Yes                           |
| CEX             | Exempt Sites                          | 7,580               | 0             |                               |
|                 | <b>Croydon Total</b>                  | <b>32,883</b>       | <b>48,474</b> |                               |
| <b>Kingston</b> |                                       |                     |               |                               |
| K1              | Chessington Equestrian Centre         | 0                   | 0             |                               |
| K2              | Genuine Solutions Group               | 1,630               | 0             |                               |
| K3              | Kingston Civic Amenity Centre         | 9,392               | 0             |                               |
| K4              | Kingston Waste Transfer Station       | 19,620              | 0             |                               |
| KEX             | Exempt Sites                          | 5,000               | 0             |                               |
|                 | <b>Kingston Total</b>                 | <b>35,642</b>       | <b>0</b>      |                               |

| Ref                    | Name   | Household/C&I<br>(tpa) | C&D<br>(tpa)   | Potential for<br>Intensification |
|------------------------|--|------------------------|----------------|----------------------------------|
| <b>Merton Capacity</b> |  |                        |                |                                  |
| M1                     | B&T@Work                                       | 0                      | 0              |                                  |
| M2                     | European Metal Recycling                       | 70,100                 | 0              |                                  |
| M4                     | Garth Road Civic Amenity Site                  | 9,866                  | 0              |                                  |
| M5                     | Garth Road Transfer Station                    | 15,704                 | 0              |                                  |
| M6                     | George Killoughery                             | 0                      | 0              |                                  |
| M7                     | LMD Waste Management (Abbey Industrial Estate) | 0                      | 20,774         |                                  |
| M8                     | LMD Waste Management (Willow Lane)             | 0                      | 33,845         |                                  |
| M9                     | Maguire Skips (Wandle Way)                     | 0                      | 0              |                                  |
| M10                    | Maguire Skips (Weir Court)                     | 0                      | 42,856         |                                  |
| M11                    | Morden Transfer Station                        | 0                      | 0              |                                  |
| M12                    | NJB Recycling                                  | 0                      | 18,030         |                                  |
| M13                    | One Waste Clearance                            | 13,453                 | 4,547          |                                  |
| M14                    | Reston Waste Transfer and Recovery             | 0                      | 30,131         |                                  |
| M15                    | Riverside AD Facility                          | 46,341                 | 0              |                                  |
| M16                    | Riverside Bio Waste Treatment Centre           | 51,715                 | 0              |                                  |
| M17                    | UK and European (Ranns) Construction           | 0                      | 0              | Yes                              |
| M18                    | Wandle Waste Management                        | 0                      | 0              |                                  |
| MEX                    | Exempt Sites <sup>13</sup>                     | 6,000                  | 0              | Yes                              |
|                        | <b>Merton Total</b>                            | <b>213,179</b>         | <b>150,183</b> |                                  |
| <b>Sutton Capacity</b> |  |                        |                |                                  |
| S1                     | 777 Recycling Centre                           | 20,625                 | 32,972         | Yes                              |
| S2                     | Beddington Farmlands ERF                       | 275,000                | 0              |                                  |
| S3                     | Cannon Hygiene                                 | 0                      | 0              | Yes                              |
| S4                     | Croydon Transfer Station                       | 21,113                 | 0              | Yes                              |
| S5                     | Hinton Skips                                   | 5,381                  | 1,819          | Yes                              |
| S6                     | Hydro Cleansing                                | 0                      | 0              |                                  |
| S7                     | Kimpton Civic Amenity Site                     | 8,640                  | 0              |                                  |
| S8                     | King Concrete                                  | 0                      | 0              | Yes                              |
| S9                     | Premier Skip Hire                              | 8,072                  | 2,728          |                                  |
| S10                    | Raven Recycling                                | 5,310                  | 5,506          |                                  |
| S11                    | TGM Environmental                              | 15,000                 | 0              |                                  |
| S12                    | Country Waste Skip Hire                        | 305,000                | 0              |                                  |
| SEX                    | Exempt Sites                                   | 500                    | 0              |                                  |
|                        | <b>Sutton Total</b>                            | <b>664,641</b>         | <b>43,025</b>  |                                  |

<sup>13</sup> including M3: Deadman Confidential



| Ref                              | Name                         | Household/C&I (tpa) | C&D (tpa)       | Potential for Intensification |
|----------------------------------|------------------------------|---------------------|-----------------|-------------------------------|
| <b>South London Capacity</b>     |                              |                     |                 |                               |
|                                  | Croydon                      | 32,883              | 48,474          |                               |
|                                  | Kingston                     | 35,642              | 0               |                               |
|                                  | Merton                       | 213,179             | 150,183         |                               |
|                                  | Sutton                       | 664,641             | 43,025          |                               |
|                                  | <b>South London Total</b>    | <b>946,345</b>      | <b>241,682</b>  |                               |
| <b>South London Capacity Gap</b> |                              |                     |                 |                               |
|                                  | South London Capacity        | 946,345             | 241,682         |                               |
|                                  | South London Target/Forecast | 929,750             | 414,380         |                               |
|                                  | <b>Capacity Gap</b>          | <b>+16,595</b>      | <b>-172,698</b> |                               |

## Waste capacity assessment

### Apportionment criteria

**3.18** Current and future waste management capacity in the SLWP area has been established using a number of data sources, including EA 'active sites', WDI and environmental permitting data. In line with the draft London Plan, waste is deemed to be 'managed' where:

- it is used in London for energy recovery;
- it relates to materials sorted or bulked in London facilities for reuse, reprocessing or recycling;
- it is reused, recycled or reprocessed in London; and
- it is produced as a solid recovered fuel (SRF) or a high-quality refuse-derived fuel (RDF) meeting the Defra definition as a minimum<sup>14</sup>.

**3.19** Where material is bulked at transfer stations for transportation to other waste management facilities, this capacity is not included as a contribution towards the apportionment targets. However, where a proportion of the incoming waste is recycled (based on EA data), this recycling capacity is included.

**3.20** Exempt sites, which do not require an environmental permit, have been included where capacity meets the requirements of the London Plan. Details of exempt sites and assumed capacities for each site are set out in Section 5.2.3 of the Technical Paper.

### Waste capacity gaps for apportionment waste

**3.21** Table 3.5 sets out the aggregated capacity for all four boroughs for the baseline year of 2017 and over the plan period from 2021 to 2036 which counts towards meeting the draft London Plan apportionment. It shows that total capacity is due to decrease, as the Viridor Recycling & Composting Centre within LB Sutton only has temporary planning permission until 2023. Overall the capacity gap is projected to increase from 117 ktpa in

<sup>14</sup> refuse derived fuel (RDF) consists of residual waste that complies with the specifications in a written contract between the producer of the RDF and a permitted end-user for the thermal treatment of the waste in an energy from waste facility or a facility undertaking co-incineration such as cement and lime kilns

2021 to 182 ktpa by 2036, due to the loss of this site and the increasing apportionment target. Table 3.5 differs from Table 3.4 as it does not include planning permissions.

**Table 3.5 Management capacity for household and C&I (apportionment) waste, apportionment targets and capacity gap for the SLWP area from 2021-36 (tonnes per annum)**

|                                      | 2021           | 2026           | 2031           | 2036           |
|--------------------------------------|----------------|----------------|----------------|----------------|
| Transfer                             | 281,299        | 259,225        | 259,225        | 259,225        |
| Recycling and Reuse                  | 96,809         | 96,809         | 96,809         | 96,809         |
| Composting, AD and Land spread       | 98,056         | 98,056         | 98,056         | 98,056         |
| Energy from waste                    | 275,000        | 275,000        | 275,000        | 275,000        |
| Exemptions                           | 19,080         | 19,080         | 19,080         | 19,080         |
| <b>Total capacity</b>                | <b>770,244</b> | <b>748,170</b> | <b>748,170</b> | <b>748,170</b> |
| Apportionment                        | 887,000        | 901,250        | 915,500        | 929,750        |
| <b>Capacity gap</b>                  | <b>116,756</b> | <b>153,080</b> | <b>167,330</b> | <b>181,580</b> |
| <b>Land requirement<sup>15</sup></b> | <b>1.95 ha</b> | <b>2.55 ha</b> | <b>2.79 ha</b> | <b>3.03 ha</b> |

Waste capacity gaps for construction & demolition (C&D) waste for the SLWP area  
**3.22** Table 3.6 shows that the aggregated capacity gap for C&D waste is predicted to increase from 148 ktpa in 2021 to 168 ktpa in 2036, due to anticipated increased C&D waste generation. Table 3.6 differs from Table 3.4 as it does not include planning permissions.

**Table 3.6: Management capacity for construction and demolition (C&D) waste, arisings and capacity gap for the SLWP area from 2021 to 2036 (tonnes per annum)**

|                         | 2021           | 2026           | 2031           | 2036           |
|-------------------------|----------------|----------------|----------------|----------------|
| Transfer                | 213,146        | 213,146        | 213,146        | 213,146        |
| Recycling and Reuse     | 32,972         | 32,972         | 32,972         | 32,972         |
| <b>Total capacity</b>   | <b>246,118</b> | <b>246,118</b> | <b>246,118</b> | <b>246,118</b> |
| C&D waste arisings      | 394,499        | 399,223        | 408,315        | 414,380        |
| <b>Capacity gap</b>     | <b>148,381</b> | <b>153,105</b> | <b>162,197</b> | <b>168,262</b> |
| <b>Land requirement</b> | <b>2.47 ha</b> | <b>2.55 ha</b> | <b>2.70 ha</b> | <b>2.80 ha</b> |

Overall waste capacity gaps for the SLWP area

**3.23** Table 3.7 shows that overall waste management capacity within the SLWP areas is forecast to increase from 265 ktpa to 350 ktpa by 2036, meaning that the estimated land requirement for additional sites across the four boroughs will increase from 4.42 to 5.83 ha.

<sup>15</sup> the land requirement to meet the capacity gap uses a conversion figure of 60,000 tonnes per hectare. This figure is based upon a number of data sources and conversion factors used for other adopted waste plans. The rationale behind this figure is explained in this Appendix 3 of the Technical Paper

**Table 3.7: Overall capacity gap for the SLWP area from 2021 to 2036 (tonnes per annum)**

|                         | 2021           | 2026           | 2031           | 2036           |
|-------------------------|----------------|----------------|----------------|----------------|
| Target                  | 1,281,499      | 1,300,473      | 1,323,815      | 1,344,130      |
| Capacity                | 1,016,362      | 994,288        | 994,288        | 994,288        |
| <b>Capacity gap</b>     | <b>265,137</b> | <b>306,185</b> | <b>329,527</b> | <b>349,842</b> |
| <b>Land requirement</b> | <b>4.42 ha</b> | <b>5.10 ha</b> | <b>5.49 ha</b> | <b>5.83 ha</b> |

### Comparison of the capacity gaps and potential new capacity

**3.24** Table 3.8 compares the capacity gaps with the potential new capacity identified, and calculates the 'balance of capacity' over the plan period from 2021 to 2036.

**Table 3.8: Summary of waste capacity gaps in the SLWP area from 2021 to 2036 (tonnes and hectares)**

|   |                        | 2021     | 2026     | 2031     | 2036     |
|---|------------------------|----------|----------|----------|----------|
| Household and C&I (apportionment) waste | Capacity gap           | 116,756  | 153,080  | 167,330  | 181,580  |
|   | Potential new capacity | 270,000  | 270,000  | 270,000  | 270,000  |
|   | Balance                | +153,244 | +116,920 | +102,670 | +88,420  |
| C&D waste                               | Capacity gap           | 148,381  | 153,105  | 162,197  | 168,262  |
|   | Potential new capacity | 218,000* | 218,000* | 218,000* | 218,000* |
|   | Balance                | +69,619  | +64,895  | +55,803  | +49,738  |

**3.25** Based on the above calculations, the Technical Paper concludes that the waste sites identified by the consultants as suitable for intensification and development represent sufficient opportunity to meet the capacity gaps for household, C&I and C&D waste streams. Table 3.7 shows that if all potential new capacity identified were to be brought forward, there would be surplus capacity for the management of household, C&I and C&D waste streamsthroughout the plan period from 2021 to 2036. Although this surplus is forecast to decrease over the plan period, there is considered to be some flexibility in bringing this capacity forward. Furthermore, the boroughs dispute that all of this new capacity is deliverable and therefore Table 3.4 is a more reliable guide to future capacity.

**3.26** As sufficient opportunities can be identified to meet South London's capacity gap for household, C&I (apportioned waste) and C&D waste streams, the Technical Paper concluded that it will not be necessary for the updated SLWP to identify any new areas for new waste facilities within the four boroughs.



## 4 SUSTAINABILITY APPRAISAL AND STRATEGIC ENVIRONMENTAL ASSESSMENT

---

### Government Guidance and best practice

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

### Main Stages of Appraisal

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

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

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

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

**4.4** The SA Scoping Report (i.e. this document) presents the outcome of Stage A in relation to the appraisal of the emerging SLWP.

#### Stage B: Developing and Refining Options and Assessing Effects

**4.5** Stage B, which is to be undertaken as part of the preparation of 'issues and options' and subsequently in the preparation of 'preferred options', involves:

- **Task B1:** Testing plan objectives against the SA Framework to ensure compatibility;
- **Task B2:** Developing plan options, working with the community and stakeholders, in order to achieve the objectives and contribute to sustainable development;

- **Task B3:** Predicting the social, economic and environmental effects of the plan options against the SA Framework and comparing with the ‘no plan’ and ‘business as usual’ scenarios;
- **Task B4:** Evaluating the effects of the plan in terms of their significance and the overall sustainability of each option, including the ‘preferred option’;
- **Task B5:** Considering ways of mitigating adverse effects and maximising beneficial effects; and
- **Task B6:** Proposing measures to monitor the significant effects of plan implementation.

#### Stage C: Preparing the Sustainability Appraisal Report

**4.6** The SA Report, which must be prepared alongside the ‘preferred options’ document for statutory public consultation, is the key output of the appraisal process.

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

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

**4.8** In line with Task C1, it is therefore intended to prepare a series of SA reports for public consultation (i) at the SLWP ‘issues and options’ stage (ii) at the ‘proposed submission’ stage; and (iii) on the submission draft incorporating minor changes.

#### Stage D: Consulting on Preferred Options

**4.9** Stage D involves the following Tasks:

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

#### Stage E: Monitoring the significant effects of implementing the plan

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

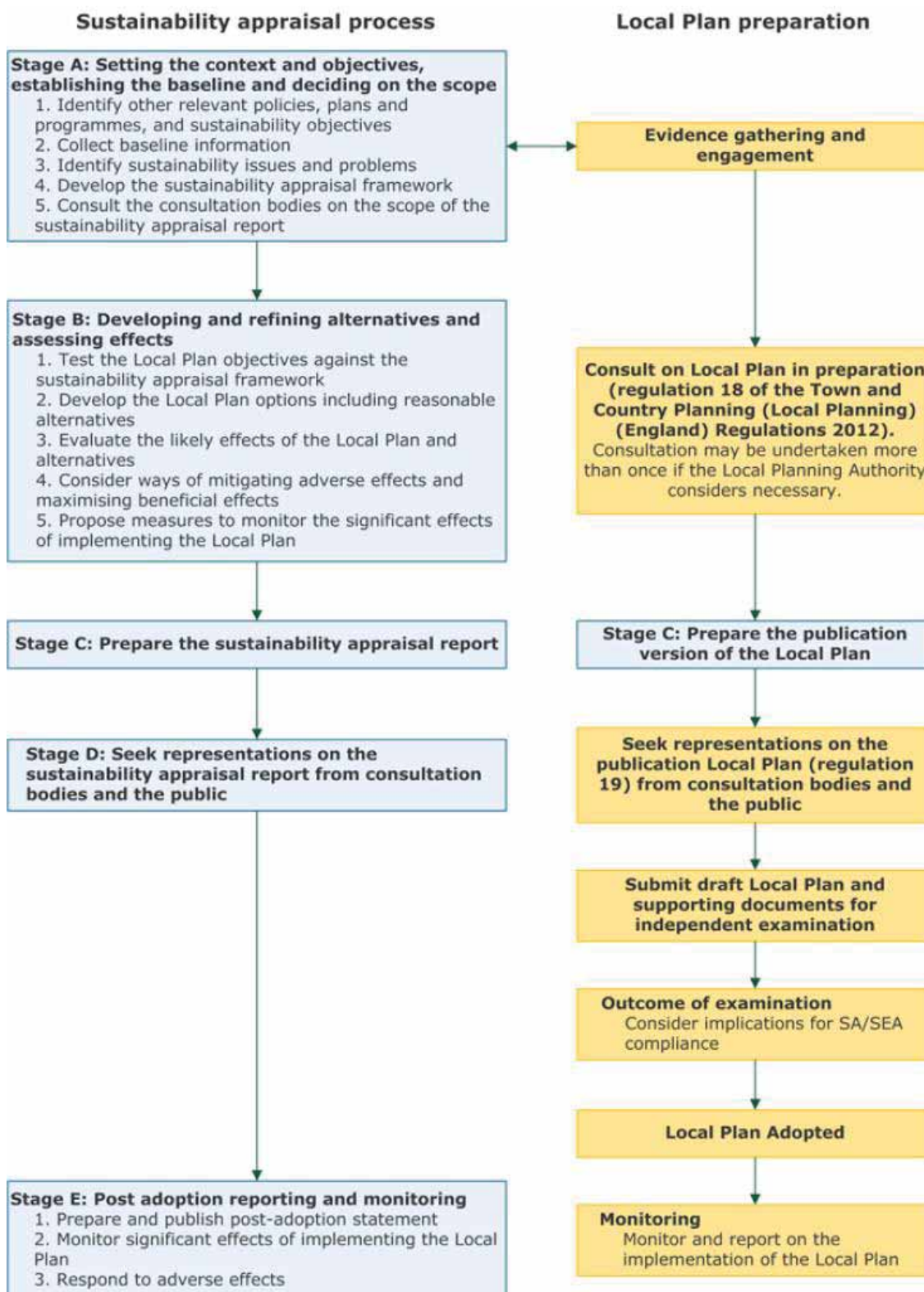
- **Task E1:** Finalising aims and methods for monitoring; and
- **Task E2:** Responding to adverse effects.

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

## Key Outputs of Appraisal

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

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



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

**Table 4.1: Key Outputs of the SA process**

| Stage of Plan Preparation  | Key Appraisal Outputs<br>(publication of SA Reports)   | Timescale  |
|--|--|--|
| Evidence Gathering   | <ul style="list-style-type: none"> <li>• <b>SA Scoping Report</b> (this document)<br/><i>SA Stages A1-A5</i></li> </ul>  | Consultation with relevant bodies<br>13 Sept – 18 Oct 2019 |
| Consultation on Issues and Options   | <ul style="list-style-type: none"> <li>• <b>SA Report on Issues &amp; Options</b></li> <li>• Equalities Impact Assessment (EqIA) report</li> <li>• Habitats Regulations Assessment (HRA) screening<br/><i>SA Stages A1-A5</i></li> </ul> | 31 October – 22 December 2019                              |
| Consultation on draft SLWP Proposed Submission                                 | <ul style="list-style-type: none"> <li>• <b>SA Report on Proposed Submission</b></li> <li>• EqIA</li> <li>• HRA (if required)<br/><i>SA Stages C1 and D1</i></li> </ul>  | May 2020   |
| Submission of draft SLWP incorporating minor changes to the Secretary of State | <ul style="list-style-type: none"> <li>• <b>SA Report on Submission Draft incorporating minor changes</b></li> <li>• EqIA</li> <li>• HRA (if required)<br/><i>SA Stage D2(i)</i></li> </ul>  | August 2020  |
| Examination-in-Public  | n/a  | January 2021   |
| Inspector's Report   | n/a  | March 2021   |
| Adoption of SLWP incorporating modifications                                   | <ul style="list-style-type: none"> <li>• <b>SA Report on modifications</b> arising from Inspector's Report<br/><i>SA Stage D2(ii)</i></li> </ul>   | July 2021  |
| Post-adoption  | <ul style="list-style-type: none"> <li>• <b>ongoing monitoring of SLWP</b> (via AMRs)<br/><i>SA Stages E1 and E2</i></li> </ul>  | From July 2021   |

## Equalities Impact Assessment

**4.14** An Equalities Impact Assessment (EqIA) is defined by the Equality and Human Rights Commission<sup>16</sup> as “a tool that helps public authorities make sure their policies, and the ways they carry out their functions, do what they are intended to do for everybody”. EqIAs help local planning authorities to identify potential sources of discrimination against specific equalities groups arising from their policies or operations and take appropriate steps to address them. This can also highlight opportunities to promote equalities and make a positive contribution to improving quality of life for local communities. An EqIA should therefore inform policy preparation from the earliest stages of plan making.

**4.15** EqIAs have their origin in the Macpherson Enquiry into the Metropolitan Police and the subsequent Race Relations Act 2000. Further legislation extended the scope of EqIAs to address disability and gender equalities alongside racial discrimination issues. Although

<sup>16</sup> further details are available on at <http://www.equalityhumanrights.com>



the subsequent Equality Act 2010 (see below) removed the formal requirement for public bodies in England to undertake or publish a detailed EqIA of their policies, practices and decisions (including Local Plans) from April 2011, local authorities still have a legal duty to “give due regard” to the need to avoid discrimination and promote equality of opportunity for all protected groups when making policy decisions and to publish information showing how they are complying with this duty.

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

**4.17** It is therefore intended to prepare an EqIA report for consultation alongside the HRA screening report (see below) and the SA report at the SLWP Issues and Options stage (October-December 2019). The proposed scope of the EqIA is set out in Appendix 2.

### **Habitats Regulations Assessment (HRA)**

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

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

**4.20** It is therefore intended to prepare an HRA screening report for public consultation alongside the EqIA and the SA report at the Issues and Options stage in order to determine whether stages 2 and 3 of the process are required.



## 5 OTHER RELEVANT PLANS, PROGRAMMES AND SUSTAINABILITY OBJECTIVES (TASK A1)

---

### Policy review

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

**5.2** This chapter outlines the policy context within which the plan is being prepared at the European, national, subregional and local level. Full details of the review findings are set out in Chapter 2 of the South London Waste Technical Paper (Anthesis, June 2019) and in the **SA Scoping Table** included as Appendix xx.

### European context

#### EU Waste Framework Directive 2008

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

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

#### EU Waste Framework Directive 2008

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

#### Waste Electrical and Electronic Equipment Directive

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

### EU Review of Waste Policy and Legislation

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

### 'Brexit'

**5.7** The overnment's Brexit White Paper (2017) confirms that the current framework of environmental regulation set out in EU Directives will be transposed into UK law. This provides some degree of certainty in terms of policy direction for the immediate future.

## **National context**

### Localism Act 2011 and the Duty to Co-operate

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

### UK Resources and Waste Strategy

**5.9** The Government's 'Resources and Waste Strategy for England'<sup>17</sup> was introduced in December 2018, building on the earlier publication of 'A Green Future: Our 25 Year Plan to Improve the Environment'<sup>18</sup> in January 2018. In seeking to reduce the amount of waste produced, promote resource efficiency and move towards a circular economy, the strategy:

- commits to reviewing the Waste Management Plan for England, National Planning Policy for Waste and the accompanying Planning Practice Guidance in order to align national policies with the Resources and Waste Strategy;
- introduces proposals to ensure that producers will pay for the disposal of their own packaging; set a tax on plastic packaging which does not include 30% recycled content; establish deposit return schemes; deliver streamlined recycling and food waste collection services for households and businesses; and improve the efficiency of energy recovery facilities; and
- commits to develop a new approach to collecting waste data, including a move away from weight-based targets towards impact-based targets.

### Waste Management Plan for England

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

---

<sup>17</sup> available at <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>

<sup>18</sup> available at <https://www.gov.uk/government/publications/25-year-environment-plan>

## National Planning Policy Framework

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

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

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

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

## National Planning Policy for Waste (NPPW)

**5.14** The National Planning Policy for Waste<sup>19</sup> (DCLG, 2015) sets out the Government's waste planning policies which all local planning authorities must have regard to when developing local waste plans. The NPPW requires waste planning authorities to:

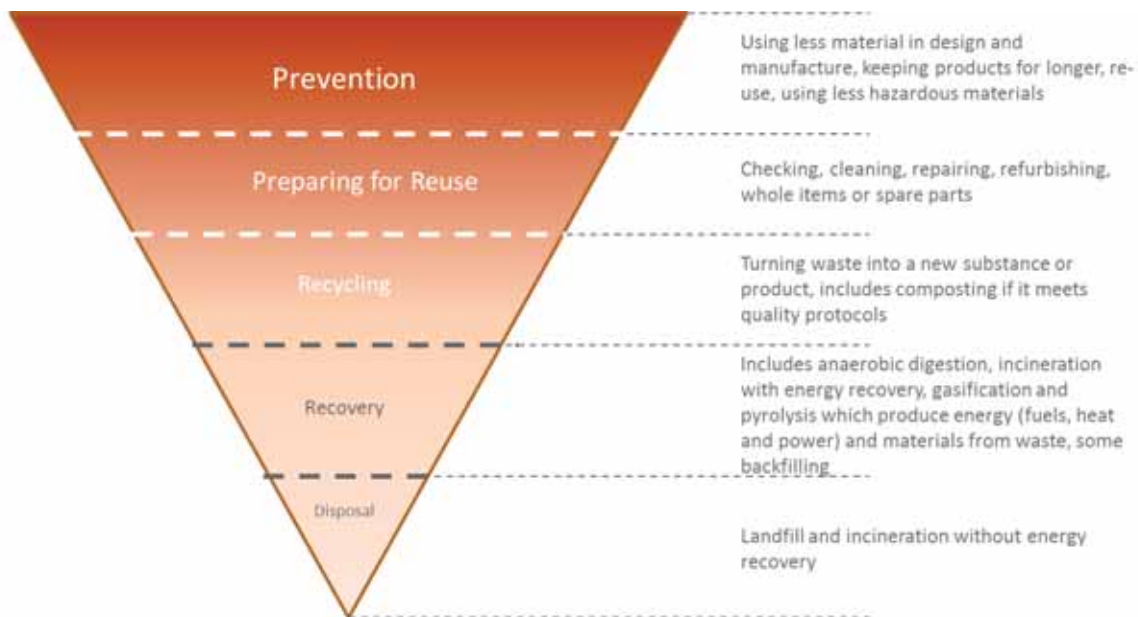
- prepare Local Plans or local waste plans which drive waste management up the waste hierarchy (see Figure 5.1);
- have regard to their apportionments set out in the London Plan when preparing their plans and work collaboratively with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management;

---

<sup>19</sup> the National Planning Policy for Waste is available at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/364759/141015\\_National\\_Planning\\_Policy\\_for\\_Waste.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

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

**Figure 5.1: The Waste Hierarchy**



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

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

**5.16** Information on existing waste management facilities should include:

- site location details - name of site and operator, address, postcode, local authority, grid reference etc;
- type of facility - what process or processes are occurring on the site and which waste streams they manage;
- licence/permit details - reference number, tonnage restrictions, waste type restrictions, dates of renewal, etc and status if not yet licensed and permitted;

- capacity information - licensed and permitted throughput by waste type;
- site lifetime or maximum capacity - it is important to record the expected lifetime of facilities and, where appropriate, their total remaining capacity;
- waste sources - origin of wastes managed, broken down by type and location;
- outputs from facility - recovery of material and energy, production and export of residues and the destination of these, where appropriate; and
- additional information - potential of site for increasing throughput, adding further capacity, other waste management uses etc.

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

## London context

### London Environment Strategy

**5.18** The Mayor’s London Environment Strategy (May 2018) updates targets for waste and recycling. These updated targets will be taken forward in a new London Plan, due for publication in 2020. The Mayor’s strategy for waste includes the following targets:

- no biodegradable or recyclable waste to landfill by 2026; and
- 65% of ‘municipal’ (household and business) waste recycled by 2030, comprising 50% LACW recycled by 2025; and 75% business recycled by 2030.

### London Plan 2016

**5.19** The London Plan (GLA, March 2016) states that London should manage as much of its waste within its boundaries as practicable, aiming to achieve waste net self-sufficiency by 2026. To meet this aim, the plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the plan. Land to manage borough waste apportionments should be brought forward through protecting and facilitating the maximum use of existing waste sites. Boroughs are encouraged to collaborate by pooling their apportionment requirements.

**5.20** As shown below in Table 5.1, the current apportionment target for the four South London boroughs by 2021 is 669,000 tpa.

**Table 5.1: London Plan 2016 apportionment targets for South London (tonnes per annum)**

|             | Apportionment 2021 | Apportionment 2036 |
|-------------|--------------------|--------------------|
| Croydon     | 199,000            | 247,000            |
| Kingston    | 119,000            | 148,000            |
| Merton      | 192,000            | 239,000            |
| Sutton      | 159,000            | 198,000            |
| <b>SLWP</b> | <b>669,000</b>     | <b>832,000</b>     |

**5.21** Many of the waste targets in the current London Plan have been superseded by the London Environment Strategy (see above). For example, recycling targets for local authority collected waste (LACW) and commercial and industrial (C&I) waste have been pushed back from 2020 to 2025 and 2030 respectively.

### Draft New London Plan 2017

**5.22** The draft new London Plan (GLA, December 2017) incorporating minor suggested changes and further suggested changes, sets out the following revised targets which reflect those set out in the London Environment Strategy:

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

**5.23** New apportionment targets are introduced for each borough in order to meet the net self-sufficiency target for LACW and C&I waste. Table 5.2 shows that the combined apportionment targets for South London from 2021 to 2036 are higher than those set by the current London Plan.

**Table 5.2: Draft new London Plan 2017 apportionment targets for South London (tpa)**

|             | Apportionment 2021 | Apportionment 2036 |
|-------------|--------------------|--------------------|
| Croydon     | 252,000            | 268,000            |
| Kingston    | 187,000            | 199,000            |
| Merton      | 238,000            | 253,000            |
| Sutton      | 210,000            | 224,000            |
| <b>SLWP</b> | <b>887,000</b>     | <b>944,000</b>     |

**5.24** The draft new London Plan waste policies have been updated to align with the NPPW approach to identifying sites and/or areas to meet identified waste management need.

**5.25** The definition of managed waste has been extended to include the production of solid recovered fuel (SRF), or it is high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition as a minimum. This increases the amount of existing capacity which counts towards managing apportioned waste.

**5.26** The further suggested changes to the London Plan make clear that boroughs are expected to identify suitable additional capacity for those waste streams not apportioned by the London Plan, where practicable.

### London Infrastructure Plan (update 2015)<sup>20</sup>

**5.27** The London Infrastructure Plan 2015 ‘Moving from waste to reuse’ seeks to move away from the ‘take-make-dispose’ economy towards a more sustainable future where goods are designed to be reused and recycled as part of the so-called circular economy. The plan sets out a commitment to ensure that circular economy principles are embedded across all areas of infrastructure delivery in London.

**5.28** The GLA and the London Water and Recycling Board (LWARB) have now

<sup>20</sup> the London Infrastructure Plan 2015 is available at [file:///civvmi\\_vnas07/MyDocs\\$/patrick.whitter/Downloads/London%20Infrastructure%20Plan%202050%20Consultation%20\(1\).pdf](file:///civvmi_vnas07/MyDocs$/patrick.whitter/Downloads/London%20Infrastructure%20Plan%202050%20Consultation%20(1).pdf)



developed a Route Map for London's transition to a circular economy<sup>21</sup>. This identifies the need for London's waste authorities, with assistance from the LWARB, to introduce more consistent collection and recycling services that will help to increase the capture of materials from individuals and businesses. Improved waste collection is needed, both under the current system and to support the circular economy. Circular economy principles can also be promoted by designing waste out of manufactured products, so that they can be disassembled and reused with the minimum of effort and energy.

**5.29** The estimated economic benefits of accelerating London's move to a circular economy include:

- reduced costs of up to £5 billion from 2016 to 2050;
- a new economic sector bringing employment opportunities and sparking innovation;
- the increased ability of industry to hedge its exposure to global commodity price volatility and supply disruption by reusing waste materials ;
- reduced toxic waste;
- reduced wider impacts, for example on transport. With a move to a circular economy, London is likely to require much less waste disposal infrastructure by 2050; and
- around 40 new facilities in addition to London's existing capacity. Most of them will be required to help reuse and recycle materials, predominantly repair workshops, disassembly lines and recycling and reprocessing facilities.

**5.30** The move towards a circular economy is already underway across London, with many companies already prospering as a result of it. It is clear that for companies to reuse resource inputs to the maximum degree, they need to increase the rate at which their products and components are collected and reused with materials recovered.

#### The Mayor's Sustainable Design and Construction SPG

**5.31** The Mayor's supplementary planning guidance (SPG) on 'Sustainable Design and Construction'(GLA, 2014)<sup>22</sup> sets out best practice guidance on circular economy principles aimed at reducing waste, increasing recovery from demolition materials, maximising pre-fabricated elements and providing sufficient space for storing recyclables and residual waste ready for collection.

**5.32** This document is likely to be superseded upon adoption of the new London Plan and the Mayor's Circular Economy Statement guidance.

#### The Mayor's Municipal Waste Management Strategy 2011

**5.33** The Mayor's Municipal Waste Management Strategy<sup>23</sup> (GLA, 2011) was produced by the previous Mayor and has been replaced by the London Environment Strategy 2017.

---

<sup>21</sup> LWARB Circular Economy Route map at <https://www.lwarb.gov.uk/what-we-do/circular-london/circular-economy-route-map/>

<sup>22</sup> [https://www.london.gov.uk/sites/default/files/gla\\_migrate\\_files\\_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf](https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf)

<sup>23</sup> the Mayor's Municipal Waste Management Strategy 2011 is available at <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/mayors-municipal-waste-management-strategy>

## Local context

### South London Waste Plan 2012

**5.34** The South London Waste Plan (SLWP) (March 2012) sets out the long-term vision, spatial strategy and policies for the sustainable management of waste within the four partner boroughs until 2022. It identifies 27 existing permitted facilities, 11 industrial areas suitable for new waste facilities and sets out policies for determining planning applications relating to waste facilities. The SLWP forms part of the local development plan for each of the partner boroughs.

**5.35** The current SLWP plan period is now coming to an end and a new waste plan for the south London is required in order to meet the updated apportionment and new waste management targets set out in the in both the draft new London Plan and the London Environment Strategy (see above).

### South London Waste Partnership Joint Municipal Waste Strategy (2011)

**5.36** The South London Waste Partnership is the disposal authority for household waste collected by the South London Boroughs. The Partnership's Joint Municipal Waste Strategy (2011) is a statement of intent to guide the authorities in undertaking their individual waste management activities. It covers the period from 2010 to 2020 and includes a strategic goal, objectives and a number of measurable targets.

### London Borough of Croydon

**5.37** Policy SP6 of Croydon's Local Plan (February 2018) identifies the current SLWP as the key delivery vehicle for waste planning and commits to working in partnership with Kingston, Merton and Sutton to plan for waste across the South London area. Strategic Objective 9 seeks to ensure the responsible use of land and natural resources and management of waste in order to mitigate and adapt to climate change. Policy DM13 requires developers to ensure that the location and design of refuse and recycling facilities are treated as an integral element of the overall design.

### Royal Borough of Kingston-upon-Thames

**5.38** Policy CS9 of Kingston's Core Strategy (April 2012) sets out strategic waste management priorities and targets for the borough and commits to working in partnership with Croydon, Merton and Sutton to plan for waste across the South London area. Core Strategy Objective 4 seeks to promote sustainable waste management within the four-borough waste partnership by preparing a Joint Waste Plan to identify suitable waste management sites to meet the London Plan apportionment, safeguard existing sites and set out appropriate planning policies to ensure high standards of development.

### London Borough of Merton

**5.39** Policy CS17 of Merton's Core Planning Strategy (July 2011) sets out strategic priorities and targets for the borough and commits to working in partnership with Croydon, Kingston and Sutton to plan for waste across the South London area. Strategic Policy 1 seeks to apply the waste hierarchy and exploit opportunities to utilise energy from waste.

**5.40** Merton's emerging (Stage 2) Local Plan (October 2018) includes an updated strategic policy which identifies the SLWP as the key delivery vehicle for waste planning. Strategic Objective 4 aim to apply the waste hierarchy and exploit opportunities to utilise

energy from waste. Policies CC8.10 and CC8.15 both include a commitment to support the principles of the circular economy.

#### London Borough of Sutton

**5.41** Sutton's Local Plan (February 2018) does not include a specific policy for waste, but instead defers to the current SLWP in the supporting text for Policy 14 on 'Industrial Land'.

**5.42** Sutton Industrial Land Phase 1 Baseline Study (Boyer, May 2016) assesses the three strategic industrial areas (SILs) of Beddington, Kimpton and Imperial as suitable for waste uses. While Beddington SIL and Kimpton SIL are identified in Schedule 2 of the SLWP, Imperial Way (6ha) is not included.

**5.43** Although the Wandle Valley Trading Estate is identified as suitable for waste uses in Schedule 2 of the SLWP, this site now forms part of a site allocation in Sutton's Local Plan and has planning permission for residential development which is currently under construction. The permission also includes a re-provision of 1,152 m<sup>2</sup> of industrial floor space on the remainder of the site

**5.44** Policy 15 states that the council will support proposals from green business where they are suitable for the location proposed.



## 6 BASELINE (TASK A2)

---

### What is baseline information?

**6.1** The term ‘baseline information’ refers to the existing environmental, economic and social characteristics of the plan area, and their likely direction of change without any change to current planning policies. The information set out in this chapter has been used as part of the scoping process as the basis for identifying the key issues and problems to be addressed by the new South London Waste Plan (SLWP) (Section 7) and for developing the proposed SA Framework as the basis for assessing the likely impacts of alternative policy options on the social, economic and environmental objectives of sustainable development (Section 8).

**6.2** The revised NPPF (MHCLG, 2019) emphasises that an up-to-date evidence base is essential for producing a sound development plan document (DPD). The environmental, social and economic baseline set out below is therefore derived from the following sources:

- Authority Monitoring Reports (AMRs) for 2017-18 prepared by the respective boroughs;
- numerous studies undertaken by the four boroughs or by consultants as part of the evidence base for the Local Plan including employment land reviews, open space studies, infrastructure studies and Strategic Flood Risk Assessment (SFRA);
- studies undertaken by the GLA or by consultants as part of the evidence base for the new London Plan, including the London Industrial Land Demand Study (CAG, 2017);
- the London Employment Sites database;
- development monitoring data via the London Development Database;
- socio-economic and environmental information from the GLA London Datastore, including borough population and household projections; and
- mid-year estimates and population data from the Office for National Statistics.

**6.3** This chapter provides an summary of the current baseline situation in terms of the key environmental, social and economic trends likely to be affected by the new plan.

### The Plan Area

**6.4** The South London Waste Plan area, consisting of the four South London Waste Partnership boroughs of Kingston-upon-Thames, Sutton, Merton and Croydon, is shown in Figure 6.1. While there are pockets of social deprivation, the area as a whole is relatively prosperous and noted for its high environmental quality.

**6.5** According to the latest mid-year estimates published by the Office of National Statistics (ONS) in 2019, the combined population of the four SLWP boroughs reached a total of 971,527 in mid 2018, representing an increase of 58,250 (+6.4%) since the 2011 Census. According to the GLA’s housing-led projections, this population is expected to increase by 115,814 or +11.4% from a total of 1,016,201 in 2021 to 1,132,015.

**6.6** In terms of the future spatial development of the four partner boroughs, the draft new London Plan identifies Opportunity Areas centred upon each of the three Metropolitan Centres of Croydon, Sutton and Kingston together with a further Opportunity Area at

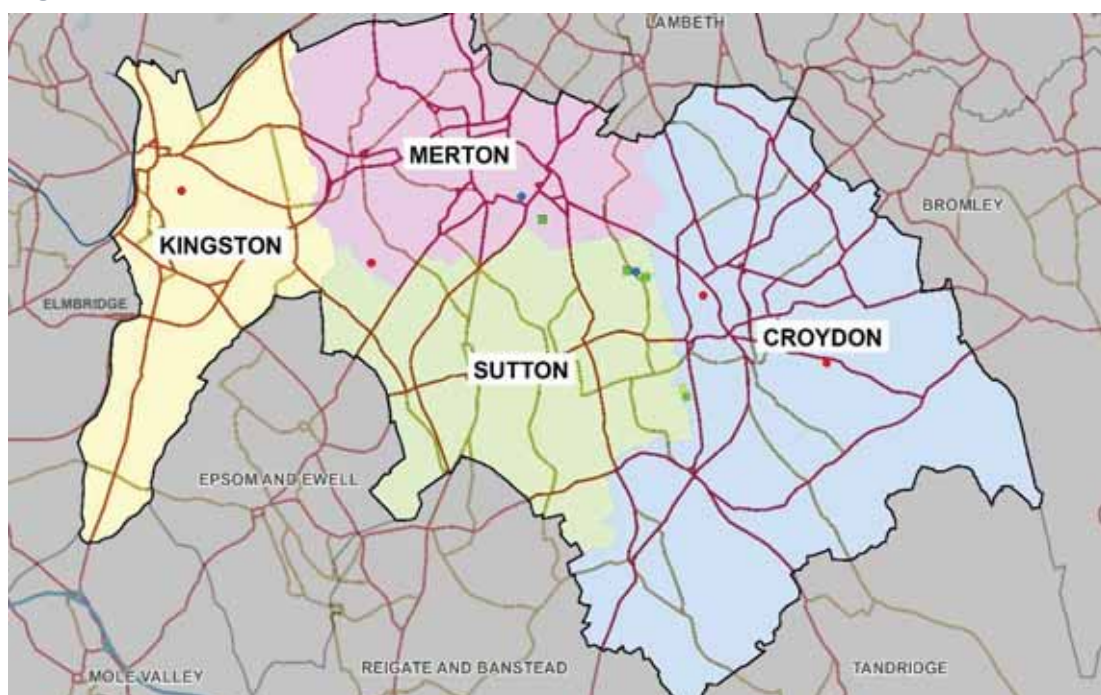
Wimbledon/ Colliers Wood/ South Wimbledon. Each of these areas of change is expected to be a focus for significant growth and economic regeneration over the lifetime of the plan to 2041. However the ability of these Opportunity Area areas to accommodate the additional housing and jobs needed over the coming decades will require major investment in strategic transport infrastructure, namely Crossrail 2 and the Tramlink extension.

**6.7** The importance of Tramlink as one of the Mayor’s Strategic Infrastructure Priorities is reflected in the Key Diagram of the draft new London Plan which identifies Croydon, Sutton and Wimbledon town centres as key elements of the ‘Trams Triangle’. Tramlink has already transformed travel opportunities within South London and the proposal to extend the tram to Sutton Town Centre and potentially beyond to the proposed London Cancer Hub (LCH) provides the potential for improving transport accessibility to the town centre and supporting the delivery of additional homes and jobs. The ‘Trams Triangle’ provides important links to central London and Gatwick via the Brighton mainline and, in the future, Crossrail 2. There are also important links to the east and west, where improved transport connections to Heathrow will be beneficial for places to the west of South West London

**6.8** The plan area contains a total of 780 ha of designated industrial land, including 10 Strategic Industrial Locations (SILs), as well as numerous smaller sites. As of 2017, 35 ha of this land (4.5%) was vacant. Many businesses, particularly in the Wandle Valley, are in a supply-chain relationship with the central London economy.. Although development opportunities in outer London tend to be concentrated in the town centres and are smaller by comparison with Inner London boroughs, the Wandle Valley corridor offers major and diverse regeneration potential, including the Wimbledon/ Colliers Wood/ South Wimbledon Opportunity Area. There is also a Strategic Office Location at Croydon Town Centre.

**6.9** There is a total of 3,439 ha of green belt and 2,458 ha of Metropolitan Open Land (MOL) in the plan area. This accounts for 28.7% of the land area of the four boroughs.

**Figure 6.1: The South London Waste Plan Area.**



## **London Borough of Croydon**

**6.10** The London Borough of Croydon has an area of 8,650 ha. According to the latest mid-year estimates published by the ONS in 2019, the resident population of Croydon reached a total of 385,346 in mid 2018.

**6.11** There is a total of 163.0 ha of designated industrial land within the borough, of which 9.6 ha (5.9%) is currently vacant. There are two Strategic Industrial Locations (SILs) at Marlpit Lane and Imperial Way/ Purley Way, accounting for 118.6 ha.

**6.12** With over 380 retail outlets, Croydon Town Centre is one of four Metropolitan Centres in South London, and has been identified as both an Opportunity Area and a Strategic Office Location in the draft new London Plan. Croydon Town Centre is supported by nine district centres at Addiscombe, Coulsdon, New Addington, Norbury, Purley, Selsdon, South Norwood, Thornton Heath, Upper Norwood/ Crystal Palace.

**6.13** Croydon is well located near to Gatwick Airport and within easy reach of central London and the south coast.

**6.14** Croydon has 2,195 ha of Green Belt and 413 ha of MOL, together accounting for 30.2% of the land area of the borough .

## **Royal Borough of Kingston-upon-Thames**

**6.15** The Royal Borough of Kingston-upon-Thames has an area of 3,726 ha. According to the latest mid-year estimates published by the ONS in 2019, the resident population of Kingston reached a total of 175,470 in mid 2018. Kingston's predominant character is of leafy suburbs with relatively low density development of two or three-storey houses with gardens, though there are some higher density neighbourhoods, mainly around Kingston and Surbiton town centres and along major roads.

**6.16** Kingston Town Centre is a Metropolitan Centre and identified as an Opportunity Area in the draft new London Plan. There are three district centres: New Malden in the east, Surbiton just south of Kingston, and Tolworth close to the A3. The council has identified four areas where there is scope for accommodating additional growth, at Kingston Town Centre; Norbiton, London Road and Cambridge Estate; New Malden and Tolworth.. However, with the introduction of Crossrail 2 is operational, the borough is expected to benefit from more Crossrail 2 stations than any other and the arrival of the new, higher frequency, higher capacity service will enable significant additional growth opportunities in these areas. It will improve Kingston's attractiveness as an office location and therefore support additional commercial growth in the town centre, building on links with Kingston University and Kingston College.

## London Borough of Merton

**6.17** Merton is the one of the smallest boroughs in London with an area of 3,762 ha. According to the latest mid-year estimates published by the ONS in 2019, the resident population of Merton reached a total of 206,186 in mid 2018.

**6.18** Crossrail 2 and associated investment are expected to have a significant impact on the future regeneration and growth of Merton. This will help support the delivery of housing, mixed-use and commercial development across the borough and the opportunity areas located within it. The step change in transport capacity and connectivity offered by Crossrail 2 is expected to transform Wimbledon into a major transport hub with opportunities for interchange with National Rail, trams and the Underground. The redevelopment required to deliver the Crossrail 2 tunnel offers the opportunity to plan for significant growth and intensification, with residential and commercial development. Crossrail 2 will strengthen Wimbledon's role as a 'major town centre', and as a location with potential for speculative office development, helping to meet the Mayor's ambition to promote growth in employment in outer London centres.

**6.19** Merton has many impressive open spaces including Mitcham and Wimbledon Commons that makes the borough one of the greenest boroughs in London. Around 18% of the borough's area is open space, compared to the 10% London average. The quality and historical character of the borough reflects the number of high quality heritage areas designated as Conservation Areas.

## London Borough of Sutton

**6.20** The London Borough of Sutton (4,485 ha) forms an important part of the Wandle Valley, one of three growth corridors identified as having 'city region importance' in the current London Plan 2016. According to the latest mid-year estimates published by the ONS in 2019, the resident population of Sutton reached a total of 204,525 in mid 2018.

**6.21** Industrial activity is concentrated in the Borough's established industrial areas, three of which are identified as strategic industrial locations (SILs). These are Kimpton, Beddington and a small part of the Purley Way SIL. Each of these is served by key radial routes into London from the M25. Elsewhere, a number of smaller industrial sites are being transformed in housing developments, for example the Felnex Trading Estate and Wandle Valley Trading Estate in Hackbridge

**6.22** Sutton Town Centre is one of four Metropolitan Centres in South London and an Opportunity Area in the draft new London Plan. The town centre has over 190 retail units within an attractive pedestrianised environment. Sutton Town Centre is complemented by seven district centres, at Cheam, North Cheam, Wallington, Worcester Park, Hackbridge, Rosehill and Carshalton, along with many local centres and dispersed parades.

**6.23** Sutton has number of high quality heritage areas designated as Conservation Areas and Areas of Special Local Character (ASLCs). In contrast, there are pockets of relative social deprivation, characterised by limited access to employment, social infrastructure and transport services, including areas to the north of the Borough, such as Rosehill, St Helier and the Wrythe, and parts of South Beddington



## POPULATION

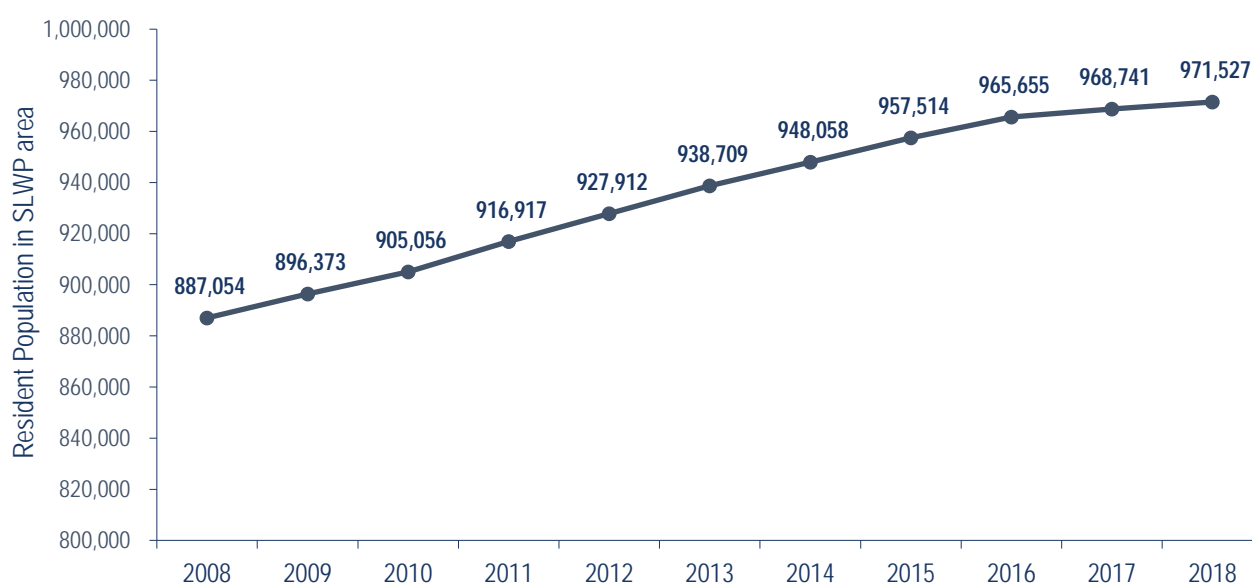
### Resident population

Table 6.1: Resident Population for SLWP boroughs and plan area

|             | Population<br>2011 Census | Population<br>mid-2018 | Change since 2011        |
|-------------|---------------------------|------------------------|--------------------------|
| Croydon     | 363,378                   | 385,346                | <b>+ 21,968 (6.0%)</b>   |
| Kingston    | 160,060                   | 175,470                | <b>+ 15,410 (9.6%)</b>   |
| Merton      | 199,693                   | 206,186                | <b>+ 6,493 (3.3%)</b>    |
| Sutton      | 190,146                   | 204,525                | <b>+ 14,379 (+ 7.6%)</b> |
| <b>SLWP</b> | <b>913,277</b>            | <b>971,527</b>         | <b>+ 58,250 (+6.4%)</b>  |

Sources: ONS Mid-Year Estimates (26 June 2019)

Figure 6.2: Population growth in the SLWP area 2008-18



### Components of population change 2017 to 2018

Table 6.2: Components of population change for SLWP boroughs and plan area

|             | Population<br>mid-2017 | Population<br>mid-2018 | Births         | Deaths        | Net<br>Migration | Overall<br>Net change |
|-------------|------------------------|------------------------|----------------|---------------|------------------|-----------------------|
| Croydon     | 384,837                | 385,346                | +5,582         | -2,564        | -2,509           | <b>+509</b>           |
| Kingston    | 174,609                | 175,470                | +2,089         | -1,108        | -120             | <b>+861</b>           |
| Merton      | 206,052                | 206,186                | +3,160         | -1,287        | -1,739           | <b>+134</b>           |
| Sutton      | 203,243                | 204,525                | +2,533         | -1,545        | 294              | <b>+1,282</b>         |
| <b>SLWP</b> | <b>968,741</b>         | <b>971,527</b>         | <b>+13,364</b> | <b>-6,504</b> | <b>-4,074</b>    | <b>+2,786</b>         |

Source: ONS Mid-Year Estimates (26 June 2019)

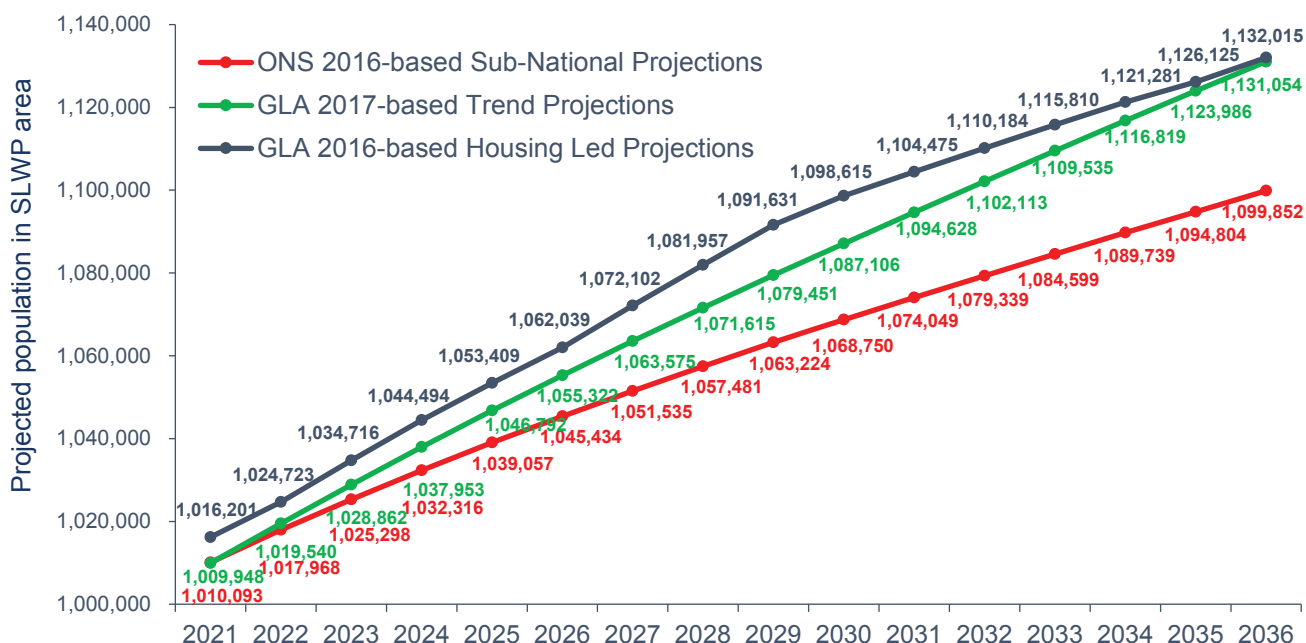
## Population projections

Table 6.3: Population projections for SLWP boroughs and plan area 2021-36

|             | Population Projections                   |                  |                          |  |                  |                          |  |                  |                        |
|-------------|--|------------------|--------------------------|--|------------------|--------------------------|--|------------------|------------------------|
|             | GLA 2016-based Housing Led <sup>24</sup> |                  |                          | GLA 2017-based Central Trend <sup>25</sup> |                  |                          | ONS 2016-based Subnational Projections |                  |                        |
|             | 2021                                     | 2036             | Change                   | 2021                                       | 2036             | Change                   | 2021                                   | 2036             | Change                 |
| Croydon     | 403,461                                  | 454,085          | +50,624 (+12.5%)         | 399,528                                    | 446,831          | +47,303 (+11.8%)         | 400,227                                | 436,252          | +36,024 (+9.0%)        |
| Kingston    | 184,660                                  | 209,179          | +24,519 (+13.3%)         | 182,794                                    | 205,858          | +23,064 (+12.6%)         | 185,017                                | 205,061          | +20,045 (+10.8%)       |
| Merton      | 214,740                                  | 238,242          | +23,502 (+10.9%)         | 215,020                                    | 238,151          | +23,131 (+10.8%)         | 212,915                                | 225,972          | +13,057 (+6.1%)        |
| Sutton      | 213,340                                  | 230,509          | +17,169 (+8.0%)          | 212,607                                    | 240,215          | +27,608 (+13.0%)         | 211,933                                | 232,566          | +20,633 (+9.7%)        |
| <b>SLWP</b> | <b>1,016,201</b>                         | <b>1,132,015</b> | <b>+115,814 (+11.4%)</b> | <b>1,009,948</b>                           | <b>1,131,054</b> | <b>+121,106 (+12.0%)</b> | <b>1,010,093</b>                       | <b>1,099,852</b> | <b>+89,759 (+8.9%)</b> |

Sources: GLA 2016-based Trend Projections; GLA 2016-based Housing Led Projections; and ONS 2016-based Population Projections

Figure 6.3: Population projections for SLWP boroughs and plan area 2021-36



Sources: GLA 2016-based Trend; GLA 2016-based Housing-Led; and ONS 2016-based population projections

<sup>24</sup> GLA 2016-based housing-led projections incorporating the 2016 Strategic Housing Land Availability Assessment (SHLAA) at <https://data.london.gov.uk/dataset/projections>

<sup>25</sup> GLA 2016-based central trend population projections are available on the London Datastore at <https://data.london.gov.uk/dataset/projections>

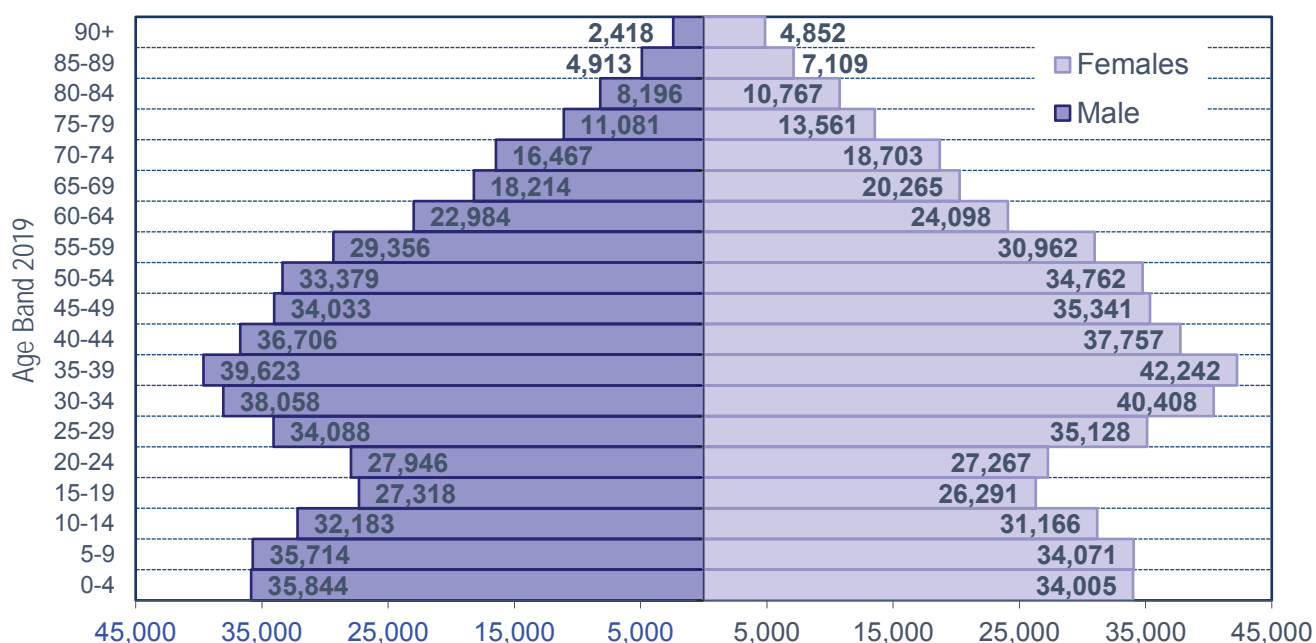
## Population structure

Table 6.4: Population structure for SLWP boroughs and plan area 2019

| Resident Population 2019 |                              |                 |                 |                        |
|--------------------------|------------------------------|-----------------|-----------------|------------------------|
|                          | Age band                     | Males           | Females         | All persons            |
| Croydon                  | Borough residents aged 0-15  | 45,403 (23.5%)  | 43,440 (21.3%)  | <b>88,842 (22.4%)</b>  |
|                          | Borough residents aged 16-64 | 123,444 (64.0%) | 130,582 (64.2%) | <b>254,025 (64.1%)</b> |
|                          | Borough residents aged 64+   | 24,159 (12.5%)  | 29,520 (14.5%)  | <b>53,680 (13.5%)</b>  |
|                          | <b>Total</b>                 | <b>193,006</b>  | <b>203,542</b>  | <b>396,548</b>         |
| Kingston                 | Borough residents aged 0-15  | 18,342 (20.5%)  | 17,875 (19.6%)  | <b>36,218 (20.1%)</b>  |
|                          | Borough residents aged 16-64 | 59,829 (66.9%)  | 59,722 (65.5%)  | <b>119,552 (66.2%)</b> |
|                          | Borough residents aged 64+   | 11,300 (12.6%)  | 13,529 (14.8%)  | <b>24,831 (13.7%)</b>  |
|                          | <b>Total</b>                 | <b>89,470</b>   | <b>91,128</b>   | <b>180,598</b>         |
| Merton                   | Borough residents aged 0-15  | 22,663 (21.9%)  | 21,786 (20.4%)  | <b>44,450 (21.1%)</b>  |
|                          | Borough residents aged 16-64 | 69,373 (66.9%)  | 70,358 (65.9%)  | <b>139,733 (66.4%)</b> |
|                          | Borough residents aged 64+   | 11,663 (11.2%)  | 14,607 (13.7%)  | <b>26,271 (12.5%)</b>  |
|                          | <b>Total</b>                 | <b>103,701</b>  | <b>106,751</b>  | <b>210,452</b>         |
| Sutton                   | Borough residents aged 0-15  | 23,060 (22.5%)  | 21,771 (20.3%)  | <b>44,826 (21.4%)</b>  |
|                          | Borough residents aged 16-64 | 65,108 (63.6%)  | 67,964 (63.3%)  | <b>133,065 (63.5%)</b> |
|                          | Borough residents aged 64+   | 14,167 (13.8%)  | 17,601 (16.4%)  | <b>31,770 (15.2%)</b>  |
|                          | <b>Total</b>                 | <b>102,332</b>  | <b>107,335</b>  | <b>209,666</b>         |
| SLWP area                | Residents aged 0-15          | 109,468 (22.4%) | 104,872 (20.6%) | <b>214,336 (21.5%)</b> |
|                          | Residents aged 16-64         | 317,754 (65.0%) | 328,626 (64.6%) | <b>646,375 (64.8%)</b> |
|                          | Residents aged 64+           | 61,289 (12.5%)  | 75,257 (14.8%)  | <b>136,552 (13.7%)</b> |
|                          | <b>Total</b>                 | <b>488,509</b>  | <b>508,756</b>  | <b>997,264</b>         |

Sources: GLA 2016-based Trend Projections; GLA 2016-based Housing Led Projections; and ONS 2016-based Population Projections

Figure 6.4: Population structure by gender and age band for the plan area 2019



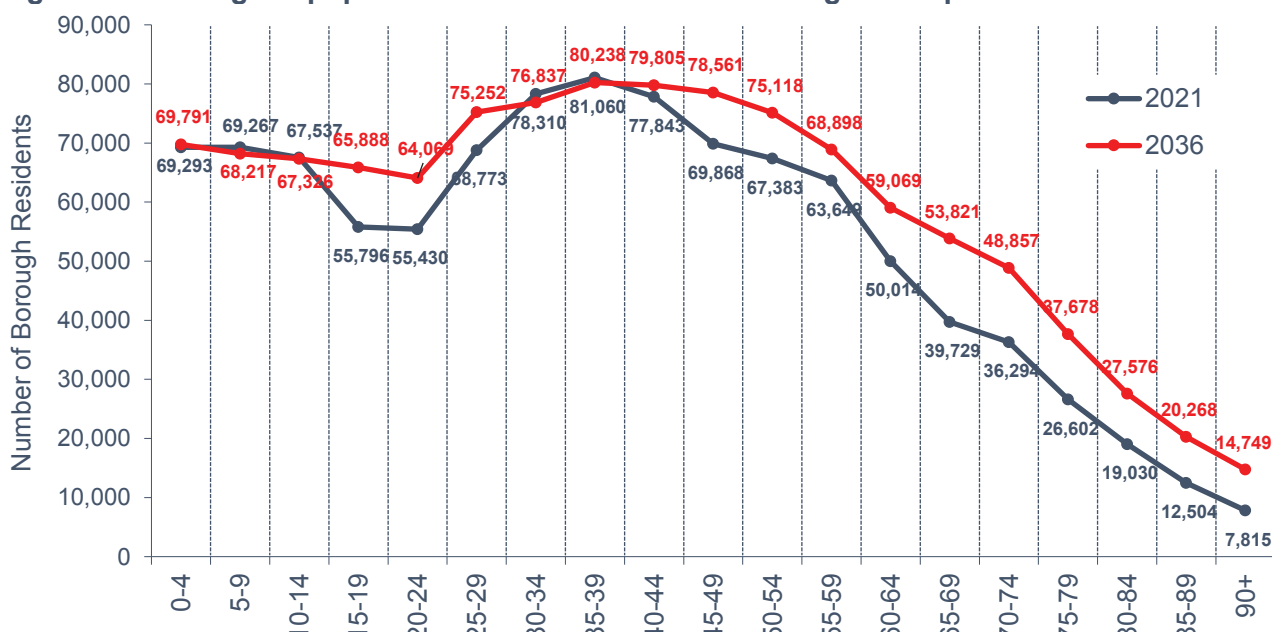
## Projected Change in Population Structure

Table 6.5: Change in population structure for SLWP boroughs and plan area 2021-36

| Resident Population |                              |                  |                  |                          |
|---------------------|------------------------------|------------------|------------------|--------------------------|
|                     | Age band                     | All persons 2021 | All persons 2036 | Projected change         |
| Croydon             | Borough residents aged 0-15  | 90,435           | 92,332           | <b>+1,897 (+2.1%)</b>    |
|                     | Borough residents aged 16-64 | 256,627          | 277,727          | <b>+21,100 (+8.2%)</b>   |
|                     | Borough residents aged 64+   | 56,399           | 84,027           | <b>+27,628 (+49%)</b>    |
|                     | <b>Total</b>                 | <b>403,461</b>   | <b>454,086</b>   | <b>+50,625 (+12.5%)</b>  |
| Kingston            | Borough residents aged 0-15  | 36,920           | 37,348           | <b>+428 (+1.2%)</b>      |
|                     | Borough residents aged 16-64 | 122,032          | 135,373          | <b>+13,341 (+10.9%)</b>  |
|                     | Borough residents aged 64+   | 25,709           | 36,458           | <b>+10,749 (+41.8%)</b>  |
|                     | <b>Total</b>                 | <b>184,661</b>   | <b>209,179</b>   | <b>+24,518 (+13.3%)</b>  |
| Merton              | Borough residents aged 0-15  | 45,079           | 45,587           | <b>+508 (+1.1%)</b>      |
|                     | Borough residents aged 16-64 | 142,531          | 155,163          | <b>+12,632 (+8.9%)</b>   |
|                     | Borough residents aged 64+   | 27,129           | 37,495           | <b>+10,366 (+38.2%)</b>  |
|                     | <b>Total</b>                 | <b>214,739</b>   | <b>238,245</b>   | <b>+23,506 (+10.9%)</b>  |
| Sutton              | Borough residents aged 0-15  | 45,760           | 43,588           | <b>-2,172 (-4.7%)</b>    |
|                     | Borough residents aged 16-64 | 134,839          | 141,951          | <b>+7,112 (+5.3%)</b>    |
|                     | Borough residents aged 64+   | 32,737           | 44,969           | <b>+12,232 (+37.4%)</b>  |
|                     | <b>Total</b>                 | <b>213,336</b>   | <b>230,508</b>   | <b>+17,172 (+8.0%)</b>   |
| SLWP area           | Borough residents aged 0-15  | 218,194          | 218,855          | <b>+661 (+0.3%)</b>      |
|                     | Borough residents aged 16-64 | 656,029          | 710,214          | <b>+54,185 (+8.3%)</b>   |
|                     | Borough residents aged 64+   | 141,974          | 202,949          | <b>+60,975 (+42.9%)</b>  |
|                     | <b>Total</b>                 | <b>1,016,197</b> | <b>1,132,018</b> | <b>+115,821 (+11.4%)</b> |

Sources: GLA 2016-based Trend Projections; GLA 2016-based Housing Led Projections; and ONS 2016-based Population Projections

Figure 6.5: Change in population structure for SLWP boroughs and plan area 2021-36



## Population density

Table 6.6: Population density

|             | Population mid-2018 | Area (ha)     | Population density (residents/ha) |
|-------------|---------------------|---------------|-----------------------------------|
| Croydon     | 385,346             | 8,650         | 44.5                              |
| Kingston    | 175,470             | 3,726         | 47.1                              |
| Merton      | 206,186             | 3,762         | 54.8                              |
| Sutton      | 204,525             | 4,385         | 46.6                              |
| <b>SLWP</b> | <b>971,527</b>      | <b>20,523</b> | <b>47.3</b>                       |
| London      | 8,908,081           | 159,471       | 55.9                              |

Source: ONS Mid-Year Estimates (26 June 2019)

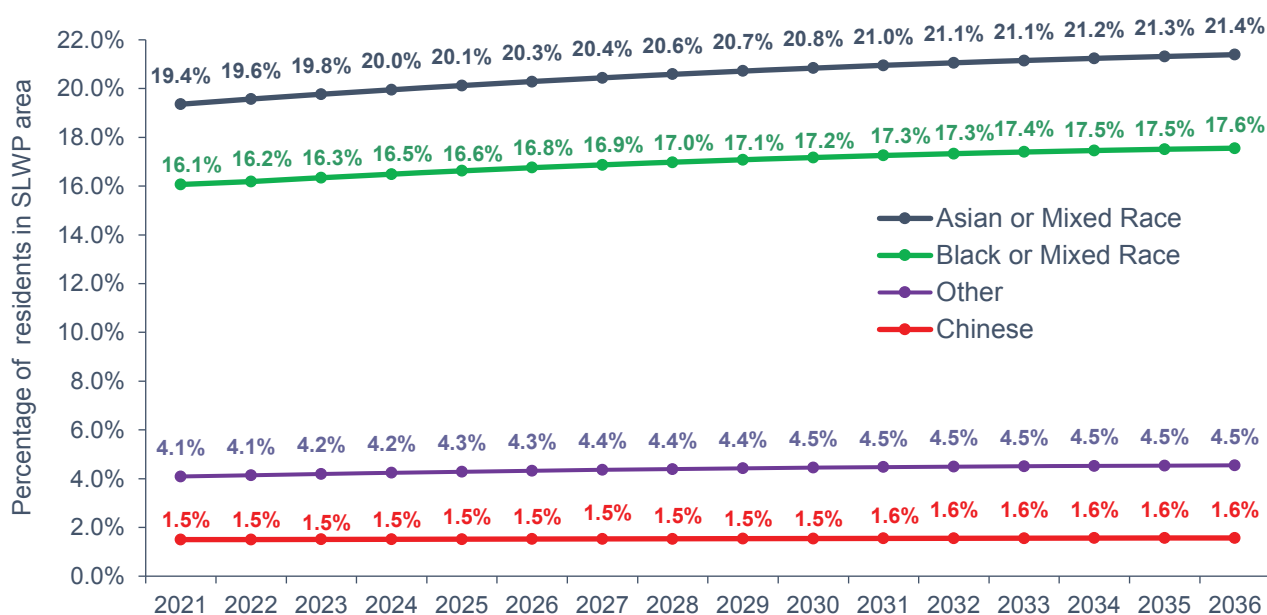
## Ethnicity

Table 6.7: Ethnic breakdown for SLWP boroughs and plan area 2019

|             | White                    | Black and Minority Ethnic (BAME) | Asian or Mixed Race      | Black or Mixed Race      | Other                 | Chinese               |
|-------------|--------------------------|----------------------------------|--------------------------|--------------------------|-----------------------|-----------------------|
| Croydon     | 188,737 (47.6%)          | 207,812 (52.4%)                  | 76,805 (19.4%)           | 109,216 (27.5%)          | 16,762 (4.2%)         | 5,029 (1.3%)          |
| Kingston    | 121,925 (67.5%)          | 58,673 (32.5%)                   | 36,758 (20.4%)           | 8,292 (4.6%)             | 9,520 (5.3%)          | 4,104 (2.3%)          |
| Merton      | 133,098 (63.2%)          | 77,354 (36.8%)                   | 42,749 (20.3%)           | 24,124 (11.5%)           | 7,561 (3.6%)          | 2,920 (1.4%)          |
| Sutton      | 153,461 (73.2%)          | 56,206 (26.8%)                   | 31,975 (15.3%)           | 15,833 (7.6%)            | 5,686 (2.7%)          | 2,711 (1.3%)          |
| <b>SLWP</b> | <b>597,221 (59.9%)</b>   | <b>400,045 (40.1%)</b>           | <b>188,287 (18.9%)</b>   | <b>157,465 (15.8%)</b>   | <b>39,529 (4.0%)</b>  | <b>14,764 (1.5%)</b>  |
| London      | <b>5,161,532 (56.7%)</b> | <b>3,944,624 (43.3%)</b>         | <b>1,819,907 (20.0%)</b> | <b>1,442,062 (15.8%)</b> | <b>526,430 (5.8%)</b> | <b>156,224 (1.7%)</b> |

Source: GLA Housing-led Ethnic Projections (November 2017)

Figure 6.6: Projected ethnic breakdown for plan area 2021-36



## Religion

Table 6.8: Religion for SLWP boroughs and plan area 2019

|             | Christian    | Buddhist    | Hindu       | Jewish      | Muslim      | Sikh        | Other Religion | No Religion  |
|-------------|--------------|-------------|-------------|-------------|-------------|-------------|----------------|--------------|
| Croydon     | 49.3%        | -           | 5.5%        | -           | 8.8%        | -           | 2.8%           | 33.6%        |
| Kingston    | 41.9%        | 1.3%        | 6.1%        | -           | 11.0%       | -           | 2.2%           | 37.6%        |
| Merton      | 51.7%        | -           | 5.3%        | -           | 6.1%        | -           | 3.5%           | 33.3%        |
| Sutton      | 48.8%        | -           | 8.2%        | -           | 7.3%        | -           | 2.1%           | 33.6%        |
| <b>SLWP</b> | <b>48.4%</b> | <b>0.2%</b> | <b>6.2%</b> | <b>0.0%</b> | <b>8.3%</b> | <b>0.0%</b> | <b>2.7%</b>    | <b>34.3%</b> |
| London      | 44.5%        | 0.9%        | 5.2%        | 2.2%        | 14.2%       | 1.4%        | 2.3%           | 29.4%        |

Source: GLA Datastore – Annual Population Survey (June 2019)

## Household growth

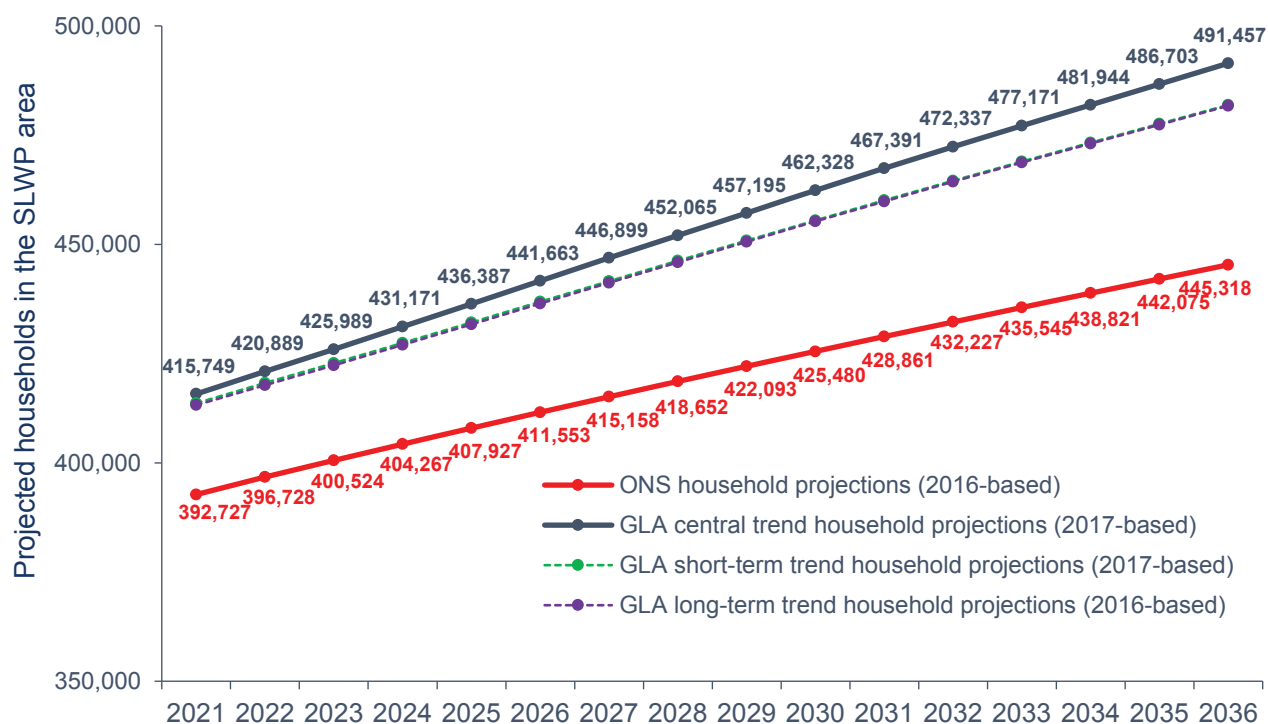
Table 6.9: Household growth within SLWP boroughs and plan area from 2011 to 2019

|             | Number of households |                |                         |
|-------------|----------------------|----------------|-------------------------|
|             | 2011                 | 2019           | Change since 2011       |
| Croydon     | 145,640              | 162,205        | +16,565 (+11.4%)        |
| Kingston    | 63,755               | 71,250         | +7,495 (+11.8%)         |
| Merton      | 79,056               | 85,249         | +6,193 (+7.8%)          |
| Sutton      | 78,576               | 86,595         | +8,019 (+10.2%)         |
| <b>SLWP</b> | <b>367,027</b>       | <b>405,299</b> | <b>+38,272 (+10.4%)</b> |

Sources: GLA Central Trend Projection 2017-based<sup>26</sup>

## Household projections 2021-36

Figure 6.7: Household projections for plan area 2021-36



<sup>26</sup> the 'central' trend projection informs the London Plan and is considered by the GLA to be the most appropriate for medium to long-term strategic planning. This model is based on past trends in births, deaths and migration to project future populations in London using 10-year average domestic migration rates, international migration in-flows and international out-migration rates

## Housing tenure by household

Table 6.10: Household tenure by household for SLWP boroughs and plan area

|             | Number of households      |                           |                                      |                              | Total          |
|-------------|---------------------------|---------------------------|--------------------------------------|------------------------------|----------------|
|             | Own Outright              | Mortgage                  | Rented from Council or Reg. Provider | Rented from private landlord |                |
| Croydon     | 39,300<br>(26.5%)         | 58,200<br>(39.2%)         | 22,400<br>(15.1%)                    | 28,300<br>(19.1%)            | 148,300        |
| Kingston    | 20,300<br>(31.1%)         | 19,700<br>(30.2%)         | 8,200<br>(12.6%)                     | 17,100<br>(26.2%)            | 65,300         |
| Merton      | 25,300<br>(31.5%)         | 24,900<br>(31.0%)         | 10,700<br>(13.3%)                    | 19,400<br>(24.2%)            | 80,300         |
| Sutton      | 23,900<br>(30.6%)         | 30,500<br>(39.1%)         | 8,900<br>(11.4%)                     | 14,800<br>(19.0%)            | 78,100         |
| <b>SLWP</b> | <b>108,800</b><br>(29.2%) | <b>133,300</b><br>(35.8%) | <b>50,200</b><br>(13.5%)             | <b>79,600</b><br>(21.4%)     | <b>372,000</b> |

Sources: ONS Annual Population Survey 2017

## Car ownership

Table 6.11: Household tenure by household for SLWP boroughs and plan area

|             | Cars      | Households | Cars per household | London ranking (out of 33 boroughs) |
|-------------|-----------|------------|--------------------|-------------------------------------|
| Croydon     | 141,252   | 162,205    | 0.87               | 13th                                |
| Kingston    | 65,848    | 71,250     | 0.92               | 7th                                 |
| Merton      | 71,904    | 85,249     | 0.84               | 15th                                |
| Sutton      | 87,428    | 86,595     | 1.01               | 6th                                 |
| <b>SLWP</b> | 366,432   | 405,299    | 0.90               | n/a                                 |
| LONDON      | 2,661,162 | 3,717,084  | 0.72               | n/a                                 |

Source: DVLA/DfT: Number of Licensed Vehicles June 2019

## Social deprivation

Table 6.12: Index of Multiple Deprivation (IMD 2015) - national ranking

|          | Social deprivation ranking compared to the 326 areas in England <sup>27</sup> |  |   |
|----------|---|--|---|
|          | IMD 2010  | IMD 2015   | Change 2010-15  |
| Croydon  | 107 <sup>th</sup>   | <b>96<sup>th</sup></b> most deprived in England  |  |
| Kingston | 255 <sup>th</sup>   | <b>278<sup>th</sup></b> most deprived in England |  |
| Merton   | 208 <sup>th</sup>   | <b>213<sup>th</sup></b> most deprived in England |  |
| Sutton   | 196 <sup>th</sup>   | <b>215<sup>th</sup></b> most deprived in England |  |

Source: Index of Multiple Deprivation (IMD), Department for Communities and Local Government (CLG) 2015

Table 6.13: Index of Multiple Deprivation (IMD 2015) - London ranking

|          | Social deprivation ranking compared to the 33 London Boroughs |  |   |
|----------|---|--|---|
|          | IMD 2010  | IMD 2015                                       | Change 2010-15  |
| Croydon  | 20 <sup>th</sup>  | <b>17<sup>th</sup></b> most deprived in London |  |
| Kingston | 28 <sup>th</sup>  | <b>28<sup>th</sup></b> most deprived in London | No change   |
| Merton   | 29 <sup>th</sup>  | <b>29<sup>th</sup></b> most deprived in London | No change   |
| Sutton   | 31 <sup>st</sup>  | <b>32<sup>th</sup></b> most deprived in London |  |

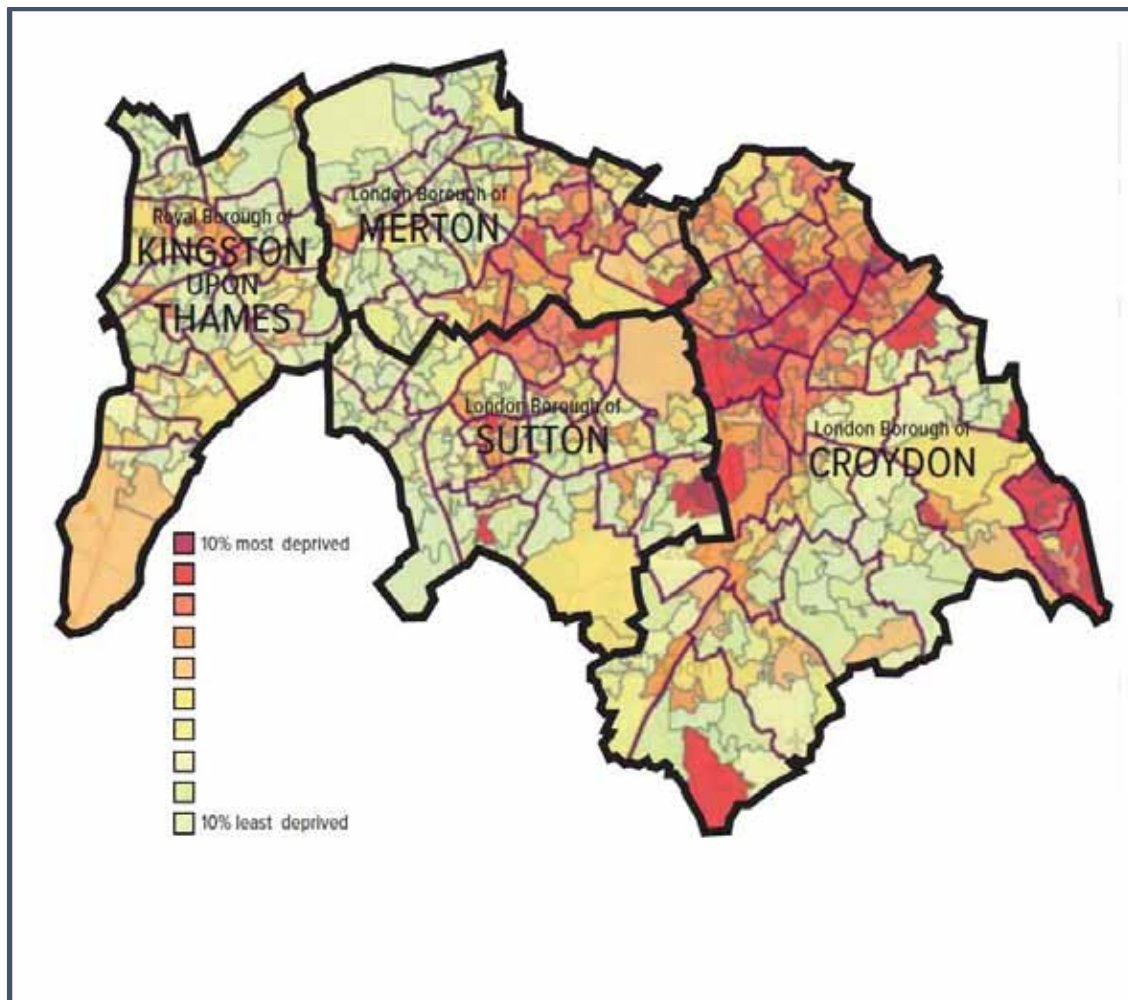
<sup>27</sup> based on IMD 2015 'rank of average score' (1<sup>st</sup> = most deprived and 326<sup>th</sup> = least deprived)

**Table 6.14: Lower Level Super Output Areas (LSOAs) in 10% most deprived LSOAs in England**

|          | IMD 2015 – Ranking of average score |                                   |                                    |                                    |
|----------|-------------------------------------|-----------------------------------|------------------------------------|------------------------------------|
|          | LSOAs ranked in 10% most deprived   | LSOAs ranked in 20% most deprived | LSOAs ranked in 10% least deprived | LSOAs ranked in 20% least deprived |
| Croydon  | 6                                   | 47                                | 28                                 | 7                                  |
| Kingston | 0                                   | 1                                 | 38                                 | 16                                 |
| Merton   | 0                                   | 4                                 | 40                                 | 16                                 |
| Sutton   | 1                                   | 7                                 | 39                                 | 17                                 |

Source: Index of Multiple Deprivation (IMD), Department for Communities and Local Government (CLG) 2015

**Figure 6.8: Index of Multiple Deprivation (IMD 2015) map for SLWP area showing lower level super output areas (LSOAs) ranked within each decile (based on national ranking)**



## Fuel Poverty

**Table 6.15: Percentage of fuel poor households for SLWP boroughs and plan area**

|             | Households     | Fuel Poor Households | Proportion of households who are fuel poor (%) |
|-------------|----------------|----------------------|--|
| Croydon     | 149,787        | 17,197               | 11.5%  |
| Kingston    | 65,753         | 7,192                | 10.9%  |
| Merton      | 81,471         | 9,012                | 11.1%  |
| Sutton      | 80,770         | 7,319                | 9.1%   |
| <b>SLWP</b> | <b>377,781</b> | <b>40,720</b>        | <b>10.8%</b>                                   |
| LONDON      | 3,371,821      | 397,924              | 11.8%  |

Source: Sub-regional fuel poverty data, Department for Business, Energy & Industrial Strategy (BEIS) 2019



## ECONOMY

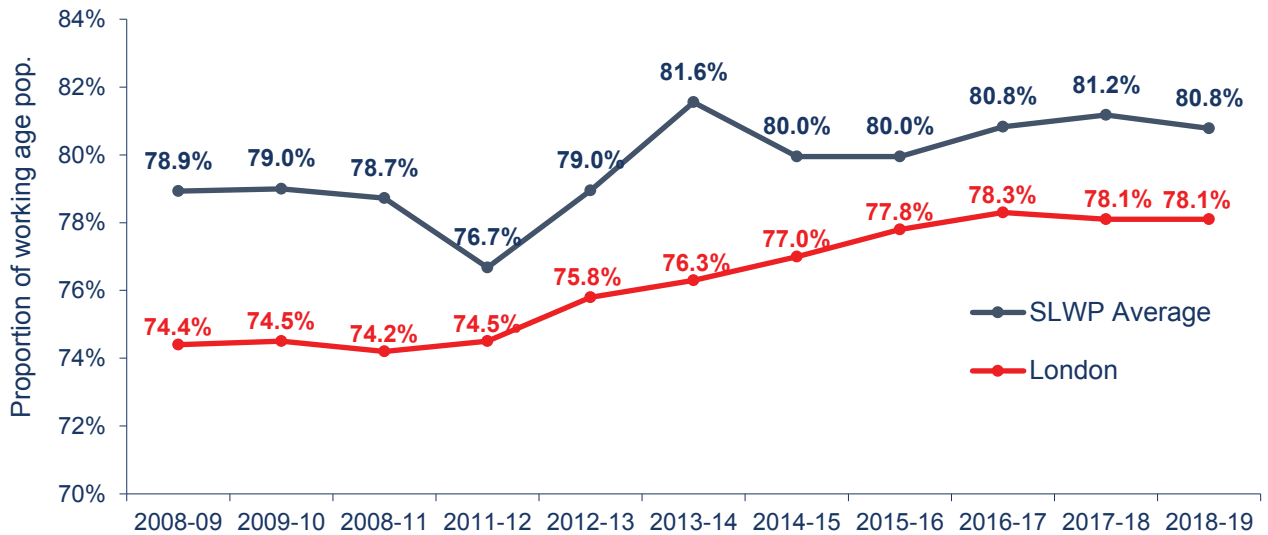
### Economic activity

Table 6.16: Proportion of working age population aged 16-64 who are economically active

|               | Residents of working age (16-64) | Residents of working age (16-64) who are economically active | Proportion of working age (16-64) residents who are economically active |
|---------------|----------------------------------|--|---|
| Croydon       | 195,200                          | 251,700  | 77.6%   |
| Kingston      | 92,900                           | 119,400  | 77.8%   |
| Merton        | 118,000                          | 138,900  | 84.9%   |
| Sutton        | 107,200                          | 129,400  | 82.8%   |
| <b>SLWP</b>   | <b>513,300</b>                   | <b>639,400</b>   | <b>80.8%</b>  |
| <b>LONDON</b> | <b>4,715,700</b>                 | <b>6,035,900</b>   | <b>78.1%</b>  |

Source: NOMIS website on behalf of ONS September 2019

Figure 6.9: Economically active residents aged 16-64 for plan area 2008-09 to 2018-19



### Employment by occupation - economically active residents aged 16-64

Table 6.17: Employment by occupation for SLWP boroughs and plan area 2018-19

| Occupation                     | Croydon           | Kingston          | Merton            | Sutton            | SLWP                             | LONDON               |
|--------------------------------|-------------------|-------------------|-------------------|-------------------|----------------------------------|----------------------|
| Managers and Senior Officials  | 10.8%<br>(21,200) | 17.3%<br>(15,600) | 11.5%<br>(13,400) | 12.8%<br>(13,600) | <b>12.5%</b><br><b>(63,800)</b>  | 12.4%<br>(573,800)   |
| Professional Occupations       | 27.3%<br>(53,700) | 29.0%<br>(26,100) | 24.5%<br>(28,400) | 24.5%<br>(25,900) | <b>26.4%</b><br><b>(134,100)</b> | 26.5%<br>(1,224,600) |
| Assoc Professional & Technical | (29,100)<br>14.8% | 18%<br>(16,200)   | 19%<br>(22,100)   | (15,100)<br>14.3% | <b>16.2%</b><br><b>82,500)</b>   | (860,700)<br>18.6%   |
| Administrative and Secretarial | 11%<br>(21,700)   | 7.2%<br>(6,500)   | 10.2%<br>(11,800) | 12.1%<br>(12,800) | <b>10.4%</b><br><b>(52,800)</b>  | 9.1%<br>(420,100)    |
| Skilled Trades                 | 6.3%<br>(12,400)  | 6.3%<br>(5,700)   | 7.1%<br>(8,200)   | 10.0%<br>(10,600) | <b>7.3%</b><br><b>(36,900)</b>   | (322,000)<br>7.0%    |
| Personal service (e.g. caring) | 9.7%<br>(19,100)  | 7.7%<br>(6,900)   | 7.9%<br>(9,200)   | 7.8%<br>(8,200)   | <b>8.5%</b><br><b>(43,400)</b>   | 7.2%<br>(332,100)    |
| Sales/ Customer Services       | 8.4%<br>(16,400)  | 3.1%<br>(2,800)   | 4.6%<br>(5,400)   | 4%<br>(4,200)     | <b>5.7%</b><br><b>(28,800)</b>   | 5.7%<br>(261,900)    |
| Plant & Machines Operatives    | 2.8%<br>(5,500)   | 3.1%<br>(2,800)   | 6.2%<br>(7,200)   | 6.9%<br>(7,300)   | <b>4.5%</b><br><b>(22,800)</b>   | 4.6%<br>(211,700)    |
| Elementary Occupations         | 8.4%<br>(16,500)  | 8.4%<br>(7,500)   | 8.4%<br>(9,800)   | 7.5%<br>(7,900)   | <b>8.2%</b><br><b>(41,700)</b>   | 8.4%<br>(390,200)    |

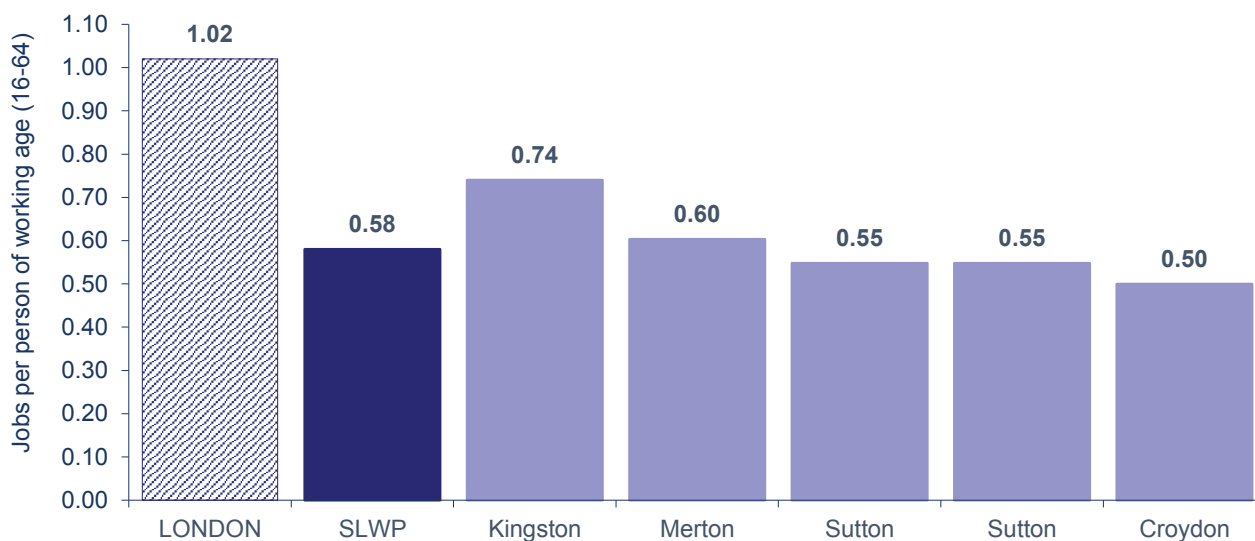
## Job Density

Table 6.18: Employee jobs per resident of working age (16-64) for SLWP boroughs 2017

|               | Employee Jobs<br>(full-time and part-time) | Residents aged 16-64 | Job Density (Jobs/resident) |
|---------------|--|----------------------|-----------------------------|
| Croydon       | 155,000                                    | 248,175              | 0.62                        |
| Kingston      | 100,000                                    | 115,883              | 0.86                        |
| Merton        | 105,000                                    | 137,594              | 0.76                        |
| Sutton        | 84,000                                     | 129,609              | 0.65                        |
| <b>SLWP</b>   | <b>444,000</b>                             | <b>631,261</b>       | <b>0.70</b>                 |
| <b>LONDON</b> | <b>6,122,000</b>                           | <b>5,973,028</b>     | <b>1.02</b>                 |

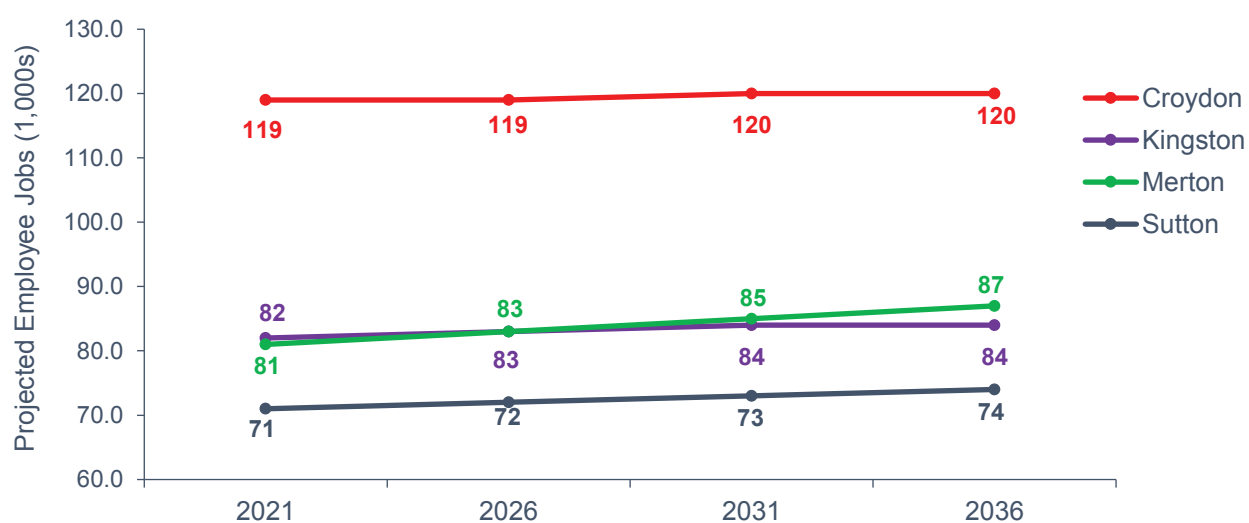
Source: NOMIS website on behalf of ONS September 2019

Figure 6.10: Job Density in LB Sutton and other South London Boroughs 2017



## Employment projections

Figure 6.11: Projected growth in employee jobs for SLWP boroughs 2021 to 2036



Source: GLA Employment Projections July 2017<sup>28</sup>

<sup>28</sup> Long term labour market projections are available on the GLA Datastore at <https://data.london.gov.uk/dataset/long-term-labour-market-projections/resource/28282ee1-5555-4524-ab43-a5df725cac43>

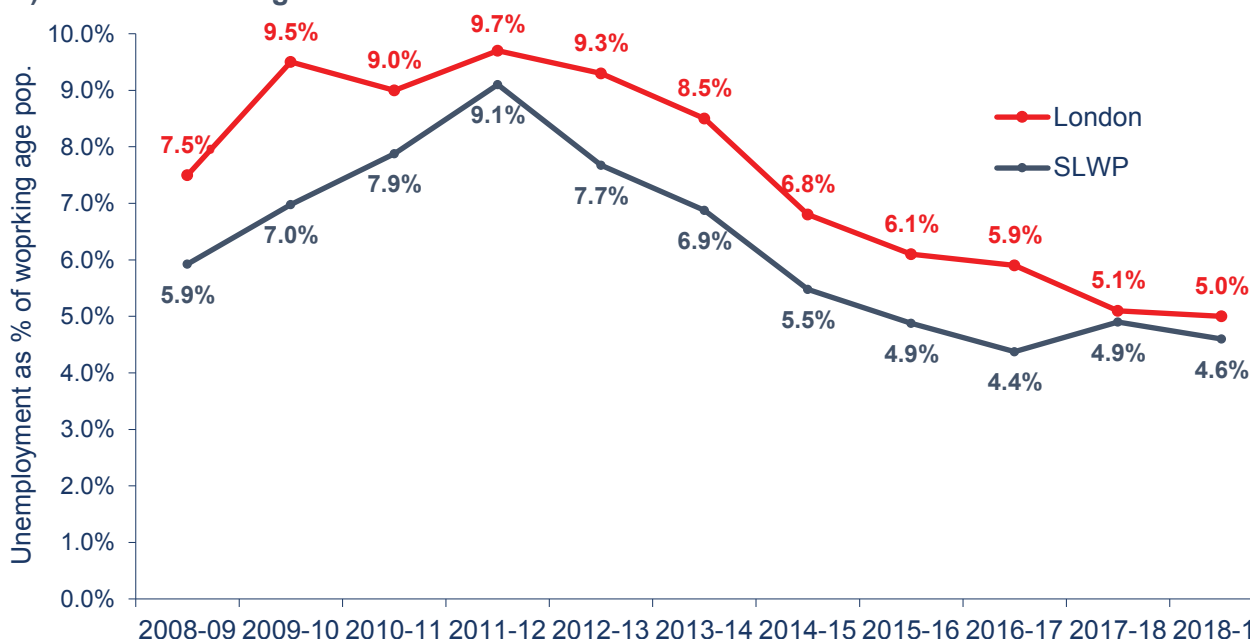
## Unemployment

**Table 6.19: Unemployment rate as a proportion of the economically active population (16-64) for SLWP boroughs, plan area and London 2018-19**

|               | Unemployed     | Residents of working age (Aged 16-64) | Unemployment rate (%) |
|---------------|----------------|---------------------------------------|-----------------------|
| Croydon       | 8,000          | 195,200                               | 4.1%                  |
| Kingston      | 5,400          | 92,900                                | 5.8%                  |
| Merton        | 4,600          | 118,000                               | 3.9%                  |
| Sutton        | 4,900          | 107,200                               | 4.6%                  |
| <b>SLWP</b>   | <b>22,900</b>  | <b>513,300</b>                        | <b>4.6%</b>           |
| <b>LONDON</b> | <b>235,300</b> | <b>4,715,700</b>                      | <b>5.0%</b>           |

Source: NOMIS website on behalf of ONS September 2019

**Figure 6.12: Unemployment rate as a proportion of the economically active population (16-64) for SLWP boroughs 2008-09 to 2018-19**



Source: ONS annual population survey/ NOMIS website September 2019

## Employment sites

**Table 6.20: Strategic Industrial Locations (SILs) within the SLWP boroughs**

|          | Strategic Industrial Location (SIL)                 | Area (ha) |
|----------|---|-----------|
| Croydon  | Marlpit Lane  |           |
|          | Imperial Way/Purley Way                             | 24.69 ha  |
| Kingston | Barwell Business Park (IBP)                         |           |
|          | Chessington Industrial Estate                       | 34.9 ha   |
| Merton   | Beverley Way Industrial Area                        |           |
|          | Morden Road Factory Estate and Prince George's Road |           |
|          | North Wimbledon (part)                              |           |
|          | Willow Lane, Beddington & Hallowfield Way           | 41.45 ha  |
| Sutton   | Kimpton Industrial Area                             | 18.8 ha   |
|          | Beddington Lane                                     | 105.8 ha  |
|          | Imperial Way  | 5.9 ha    |

Source: Local Plans

## Occupancy of industrial land

Table 6.21: Industrial land in SLWP boroughs and in the plan area: by categorisation (ha)

|  | Croydon      | Kingston     | Merton       | Sutton       | SLWP         |
|--|--------------|--------------|--------------|--------------|--------------|
| <b>Total core &amp; wider uses (ha)</b>            | <b>153.4</b> | <b>115.3</b> | <b>158.2</b> | <b>318.2</b> | <b>745.1</b> |
| Core industrial uses (ha) total                    | 122.9        | 62.2         | 138.9        | 112.3        | <b>436.3</b> |
| <i>Industry (general &amp; light industry)</i>     | <i>50.0</i>  | <i>27.8</i>  | <i>56.5</i>  | <i>32.0</i>  | <b>166.3</b> |
| <i>Warehouses, self storage &amp; open storage</i> | <i>72.9</i>  | <i>34.4</i>  | <i>82.4</i>  | <i>80.3</i>  | <b>270</b>   |
| Wider industrial uses (ha)                         | 30.5         | 53.1         | 19.3         | 205.9        | <b>308.8</b> |
| <b>Vacant industrial land (ha)</b>                 | <b>9.6</b>   | <b>0.9</b>   | <b>9.4</b>   | <b>15.1</b>  | <b>35.0</b>  |
| <b>Total industrial land (ha)</b>                  | <b>163.0</b> | <b>116.2</b> | <b>167.5</b> | <b>333.3</b> | <b>780.0</b> |
| <b>Vacancy rate (overall)</b>                      | <b>5.9%</b>  | <b>0.8%</b>  | <b>5.6%</b>  | <b>4.5%</b>  | <b>4.5%</b>  |

London Industrial Land Demand Study (CAG Consultants, October 2017)

Table 6.22: Industrial land in SLWP boroughs and within the plan area: by designation (ha)

| Designation  | Use                     | Croydon      | Kingston     | Merton       | Sutton       | SLWP         |
|--|-------------------------|--------------|--------------|--------------|--------------|--------------|
| <b>Strategic Industrial Locations (SIL)</b>        | Industrial              | 82.2         | 38.7         | 105.9        | 120.6        | 347.4        |
|  | Vacant industrial land* | 6.5          | -            | 6.0          | 3.2          | 15.7         |
|  | Non-industrial          | 29.9         | 3.4          | 15.3         | 10.8         | 59.4         |
|  | <b>Sub-Total</b>        | <b>118.6</b> | <b>42.1</b>  | <b>127.2</b> | <b>134.7</b> | <b>422.6</b> |
|  | Vacant Land % of SIL    | 5.2%         | 0.0%         | 4.5%         | 2.3%         | 3.7%         |
| <b>Locally Significant Industrial Sites (LSIS)</b> | Industrial              | 20.3         | 16.1         | 27.6         | 4.2          | 68.2         |
|  | Vacant industrial land* | 1.9          | 0.9          | 2.5          | 0.6          | 5.9          |
|  | Non-industrial          | 5.4          | 8.0          | 1.7          | 0.6          | 15.7         |
|  | <b>Sub-Total</b>        | <b>27.7</b>  | <b>25.0</b>  | <b>31.8</b>  | <b>5.4</b>   | <b>89.9</b>  |
|  | Vacant Land % of LSIS   | 6.5%         | 3.4%         | 7.2%         | 10.4%        | 6.6%         |
| <b>SIL+LSIS</b>                                    | Industrial              | 102.5        | 54.7         | 133.5        | 124.9        | 415.6        |
|  | Vacant industrial land* | 8.5          | 0.9          | 8.4          | 3.9          | 21.7         |
|  | Non-industrial          | 35.3         | 11.4         | 17.1         | 11.4         | 75.2         |
|  | <b>Sub-Total</b>        | <b>146.3</b> | <b>67.0</b>  | <b>159.0</b> | <b>140.2</b> | <b>512.5</b> |
| <b>Non-designated Industrial land</b>              | Industrial              | <b>75.2</b>  | 60.6         | 24.6         | 193.3        | 329.4        |
|  | Vacant industrial land* | 1.1          | -            | 0.9          | 11.2         | 13.2         |
| <b>Total Designated + Non-Designated (ha)</b>      | Industrial              | 153.4        | 115.3        | 158.2        | 318.2        | 745.1        |
|  | Vacant industrial land* | 9.6          | 0.9          | 9.4          | 15.1         | 35.0         |
|  | Non-industrial          | 35.3         | 11.4         | 17.1         | 11.4         | 75.2         |
| <b>GRAND TOTAL</b>                                 |                         | <b>198.3</b> | <b>127.6</b> | <b>184.6</b> | <b>344.7</b> | <b>855.2</b> |
| <b>Vacant Land (%)</b>                             |                         | <b>4.8%</b>  | <b>0.7%</b>  | <b>5.1%</b>  | <b>4.4%</b>  | <b>4.1%</b>  |

London Industrial Land Demand Study (CAG Consultants, October 2017)

**Table 6.23: Industrial land in SLWP area: core, wider and non-industrial activities for SLWP boroughs and within the plan area 2016-41**

|                                   | Use                             | Croydon      | Kingston     | Merton       | Sutton       | SLWP         |
|-----------------------------------|---------------------------------|--------------|--------------|--------------|--------------|--------------|
| Core industrial uses (ha)         | Light industry                  | -            | 15.9         | 7.4          | 7.8          | <b>38.9</b>  |
|                                   | General industry                | 42.2         | 11.9         | 49.1         | 24.1         | <b>127.3</b> |
|                                   | Warehouses                      | 63.9         | 33.6         | 72.2         | 76           | <b>245.7</b> |
|                                   | Self storage                    | 4.4          | 0.8          | 3.5          | 4.3          | <b>13</b>    |
|                                   | Open storage                    | 4.6          | 0            | 6.7          | 0            | <b>11.3</b>  |
|                                   | <b>Core Sub-Total</b>           | <b>122.9</b> | <b>62.2</b>  | <b>138.9</b> | <b>112.3</b> | <b>436.3</b> |
| Wider industrial uses (ha)        | Whole-sale markets              | 1.2          | 0.5          | 0            | 0            | <b>1.7</b>   |
|                                   | Waste management                | 5            | 34.2         | 9.4          | 6.6          | <b>55.2</b>  |
|                                   | Utilities                       | 18.6         | 16.4         | 7.5          | 193.9        | <b>236.4</b> |
|                                   | Land for rail                   | 5.6          | 1.8          | 0            | 4            | <b>11.4</b>  |
|                                   | Land for buses                  | 0.1          | 0            | 2.4          | 1.3          | <b>3.8</b>   |
|                                   | Docks                           | 0            | 0.1          | 0            | 0            | <b>0.1</b>   |
|                                   | Other industrial                | 0            | 0            | 0            | 0            | <b>0</b>     |
|                                   | <b>Wider Sub-Total</b>          | <b>30.5</b>  | <b>53.1</b>  | <b>19.3</b>  | <b>205.9</b> | <b>308.8</b> |
| Vacant land                       | Vacant industrial land          | 7.4          | 0.2          | 4.2          | 12.6         | <b>24.4</b>  |
|                                   | Land with vacant buildings      | 2.2          | 0.7          | 5.2          | 2.5          | <b>10.6</b>  |
| Non-industrial uses               | Office                          | 7.4          | 6.5          | 2.8          | 1.3          | <b>18</b>    |
|                                   | Retail                          | 15.2         | 2.7          | 12           | 7.1          | <b>37</b>    |
|                                   | Residential                     | 8.1          | 0.6          | 0.6          | 0.4          | <b>9.7</b>   |
|                                   | Recreation & leisure            | 0            | 0.3          | 0.5          | 0.6          | <b>1.4</b>   |
|                                   | Community services              | 0.8          | 0.5          | 1.3          | 0            | <b>2.6</b>   |
|                                   | Mixed-use                       | 1.4          | 0            | 0            | 0            | <b>1.4</b>   |
|                                   | Other non-industrial            | 2.4          | 0.7          | 0            | 2            | <b>5.1</b>   |
|                                   | <b>Non-industrial Sub-Total</b> | <b>35.3</b>  | <b>11.4</b>  | <b>17.1</b>  | <b>11.4</b>  | <b>75.2</b>  |
| Total: Core + Wider (ha)          |                                 | 153.4        | 115.3        | 158.2        | 318.2        | <b>745.1</b> |
| Total: Core + Wider (ha) + Vacant |                                 | 163          | 116.2        | 167.5        | 333.3        | <b>780</b>   |
| <b>GRAND TOTAL</b>                |                                 | <b>198.3</b> | <b>127.6</b> | <b>184.6</b> | <b>344.7</b> | <b>855.2</b> |

London Industrial Land Demand Study (CAG Consultants, October 2017)

## Projected change in industrial floorspace

**Table 6.24 Projected change in industrial floorspace for SLWP boroughs 2016-41**

|               | Employment Projection Method | Trend Based       |
|---------------|------------------------------|-------------------|
| Croydon       | -61,700                      | -123,600          |
| Kingston      | -41,300                      | 27,200            |
| Merton        | -21,700                      | -116,300          |
| Sutton        | -31,100                      | 98,700            |
| <b>SLWP</b>   | <b>-155,800</b>              | <b>-114,000</b>   |
| <b>LONDON</b> | <b>-1,151,400</b>            | <b>-1,048,100</b> |

Source: Employment Projection Method Trend-Based (CAG Consultants 2019)

## Projected land demand for industrial and warehousing uses

**Table 6.25: Forecast land demand for General & Light Industry for SLWP boroughs 2016-41 (ha)**

|               | Employment-Based | Trend-Based   | Average       |
|---------------|------------------|---------------|---------------|
| Croydon       | -9.5             | -19.0         | -14.3         |
| Kingston      | -6.4             | 4.2           | -1.1          |
| Merton        | -3.3             | -17.9         | -10.6         |
| Sutton        | -4.8             | 15.2          | 5.2           |
| <b>SLWP</b>   | <b>-24</b>       | <b>-17.5</b>  | <b>-20.8</b>  |
| <b>LONDON</b> | <b>-173.3</b>    | <b>-159.7</b> | <b>-166.5</b> |

Source: Employment Projection Method Trend-Based (CAG Consultants 2019)

**Table 6.26: Projected change in demand for warehouse floorspace and land for SLWP boroughs 2016-41**

|               | Floorspace       | Land (ha)    |
|---------------|------------------|--------------|
| Croydon       | -27,300          | -4.2         |
| Kingston      | -56,200          | -8.6         |
| Merton        | 41,000           | 6.3          |
| Sutton        | 110,800          | 17.0         |
| <b>SLWP</b>   | <b>68,300</b>    | <b>11.0</b>  |
| <b>LONDON</b> | <b>1,608,400</b> | <b>279.6</b> |

Source: Employment Projection Method Trend-Based (CAG Consultants 2017)

## Projected land demand for apportioned waste as of 2016 (based upon the previous London Plan)<sup>29</sup>

**Table 6.27: Indicative net land requirement for apportioned waste for SLWP boroughs to 2036**

|               | Previous London Plan 2016 apportionment of HH and C&I waste to 2036 (tpa) | Land requirement (ha) | Indicative land take of planned capacity (ha) | Net Indicative Land Requirement (ha) |
|---------------|---|-----------------------|---|--------------------------------------|
| Croydon       | 247,000   | 4.2                   | 0.2   | 4.0                                  |
| Kingston      | 148,000   | 2.5                   | 0.0   | 2.5                                  |
| Merton        | 239,000   | 4.1                   | 2.5   | 1.5                                  |
| Sutton        | 198,000   | 3.4                   | 4.8   | -1.4                                 |
| <b>SLWP</b>   | <b>832,000</b>  | <b>14.2</b>           | <b>7.5</b>                                    | <b>6.6</b>                           |
| <b>LONDON</b> | <b>8,325,000</b>  | <b>137.9</b>          | <b>171.8</b>                                  | <b>-33.9</b>                         |

Source: CAG, London Industrial Land Supply and Economy Study (GLA ,2016)

## Release of industrial land to other uses

**Table 6.28: Industrial pipeline planned release to other uses for SLWP boroughs as of 2016 (ha)**

|             | Development pipeline (LDD) | Local Plan/ Opportunity Areas/ Site Allocations | Total       |
|-------------|----------------------------|---|-------------|
| Croydon     | 1.3                        | 0   | 1.3         |
| Kingston    | 0.6                        | 0   | 0.6         |
| Merton      | 0.7                        | 0.1   | 0.8         |
| Sutton      | 10.2                       | 7.5 <sup>30</sup>                               | 17.7        |
| <b>SLWP</b> | <b>12.8</b>                | <b>7.6</b>                                      | <b>20.4</b> |

Source: CAG, London Industrial Land Supply and Economy Study (GLA ,2016)

<sup>29</sup> as discussed in Section 3 of this report, the new London Plan 2019-41 has introduced revised borough apportionment targets for household and C&I waste streams, so the data in this table will be superseded

<sup>30</sup> as of September 2019, this land (at the former Felnex industrial estate in Hackbridge) is now under construction for residential uses

**Table 6.29: Projected industrial land release by borough 2016-41**

|             | Industrial   | Warehsing   | Waste      | Other      | Demand   | Surplus from excess vacant land | Net release |
|-------------|--------------|-------------|------------|------------|----------|---------------------------------|-------------|
| Croydon     | -14.3        | -4.2        | 4.0        | 8.0        | -6.5     | -3.5                            | -9.9        |
| Kingston    | -1.1         | -8.6        | 2.5        | -          | -7.2     | 0.0                             | -7.2        |
| Merton      | -10.6        | 6.3         | 1.5        | -          | -2.8     | -2.2                            | -5.0        |
| Sutton      | 5.2          | 17.0        | -1.4       | 1.7        | 22.5     | -8.0                            | 14.5        |
| <b>SLWP</b> | <b>-20.8</b> | <b>10.5</b> | <b>6.6</b> | <b>9.7</b> | <b>6</b> | <b>-13.7</b>                    | <b>-7.6</b> |

Source: CAG, London Industrial Land Supply and Economy Study (GLA ,2016)

**Table 6.30: Comparison of London Plan 2016 Benchmark Demand and Pipeline Release of industrial land to other uses**

|             | Benchmark release (London Plan 2016) | Planned release | Planned – benchmark comparison |
|-------------|--------------------------------------|-----------------|--------------------------------|
| Croydon     | -9.9                                 | -1.3            | 8.6                            |
| Kingston    | -7.2                                 | -0.6            | 6.7                            |
| Merton      | -5.0                                 | -0.8            | 4.2                            |
| Sutton      | 14.5                                 | -17.7           | -32.2                          |
| <b>SLWP</b> | <b>-7.6</b>                          | <b>-20.4</b>    | <b>-12.7</b>                   |

Source: CAG, London Industrial Land Supply and Economy Study (GLA ,2016)

## Borough classifications for the management of industrial floorspace capacity

**Table 6.31: Management of industrial floorspace capacity – borough classifications (see also Table 6.2 of new London Plan) 2016-41<sup>31</sup>**

|          | Vacancy Rate (%) | Rents  | Baseline net release (ha) | Categorisation in new London Plan  | Notes   |
|----------|------------------|--------|---------------------------|--|---|
| Croydon  | 5.9%             | £10.25 | -9.9                      | <b>Retain</b>  | These boroughs should seek to intensify industrial floorspace capacity following the principle of no net loss across SILs and locally significant industrial areas  |
| Kingston | 0.8%             | £12.00 | -7.2                      | <b>Retain</b>  |   |
| Merton   | 5.6%             | £10.50 | -5.0                      | <b>Retain</b>  |   |
| Sutton   | 4.5%             | £11.75 | 14.5                      | <b>Provide Capacity</b><br>(i.e. demand for industrial, logistics and related uses is anticipated to be the strongest) | LB Sutton should seek to deliver intensified floorspace capacity in existing and/or new locations accessible to strategic road network and in other sustainable locations. Sutton's new Local Plan (February 2018) has identified 10 additional hectares of land for industrial uses to 2031. |

Source: Draft new London Plan 2017 and London Industrial Land Supply and Economy Study (CAG Consultants ,2016)

<sup>31</sup> in the Wandle Valley property market area there there is an overall positive net demand, and this is strongest in Sutton and Wandsworth

## Town Centre Network

Table 6.32: Town centre network in SLWP area: retail floorspace and outlets

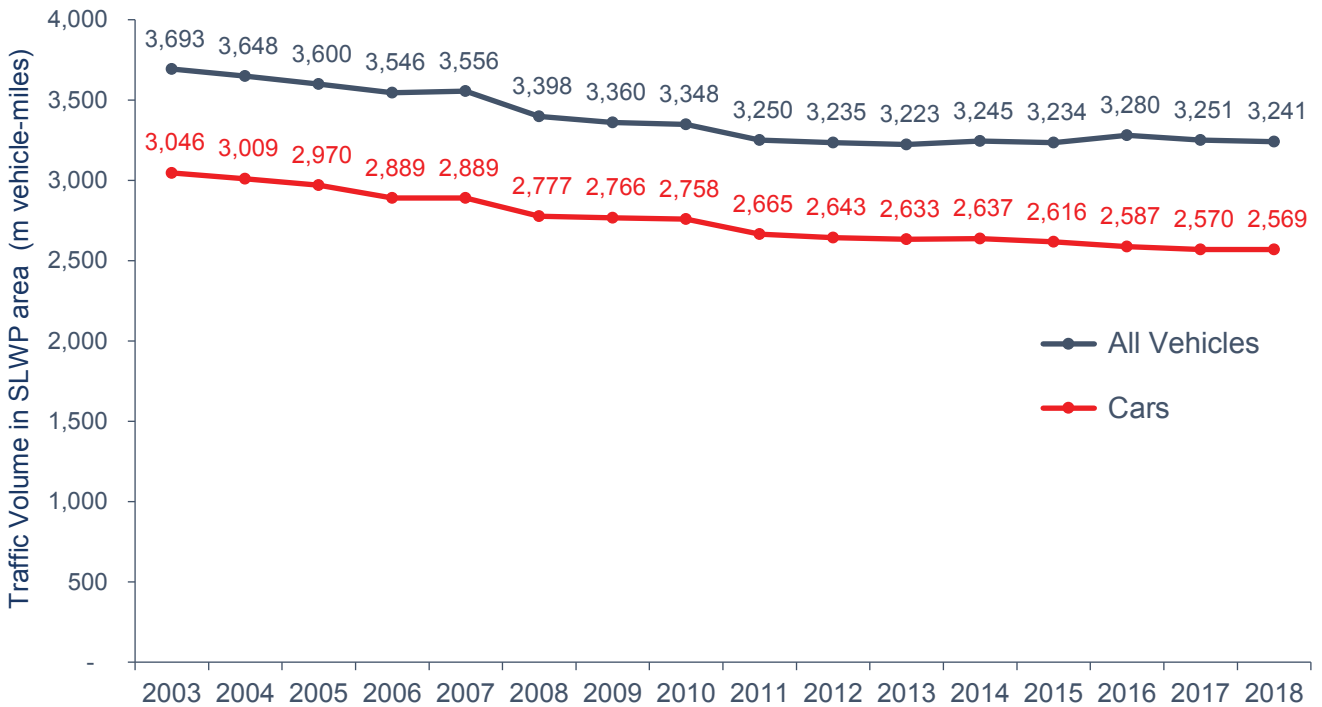
| Borough  | Centre                        | Classification (LP2016) | Retail Floorspace |                    |                | Retail Outlets |             |           |
|----------|-------------------------------|-------------------------|-------------------|--------------------|----------------|----------------|-------------|-----------|
|          |                               |                         | Comparison (sq.m) | Convenience (sq.m) | Service (sq.m) | Comparison     | Convenience | Service   |
| Croydon  | Croydon                       | Metropolitan            | 157,155           | 13,850             | 9,800          | 239            | 59          | 87        |
|          | Addiscombe                    | District                | 3,200             | 2,660              | 2,080          | 25             | 13          | 23        |
|          | Coulsdon                      | District                | 4,030             | 1,790              | 3,130          | 32             | 10          | 28        |
|          | New Addington                 | District                | 2,350             | 2,500              | 930            | 11             | 10          | 9         |
|          | Norbury                       | District                | 3,080             | 4,870              | 3,440          | 24             | 25          | 32        |
|          | Purley                        | District                | 4,150             | 8,680              | 4,500          | 25             | 7           | 39        |
|          | Selsdon                       | District                | 1,400             | 6,240              | 1,120          | 13             | 6           | 16        |
|          | South Norwood                 | District                | 2,620             | 3,230              | 3,150          | 21             | 21          | 35        |
|          | Thornton Heath                | District                | 5,030             | 11,170             | 2,790          | 31             | 28          | 37        |
|          | Upper Norwood/ Crystal Palace | District                | 6,650             | 5,330              | 2,400          | 49             | 17          | 24        |
|          | Kingston                      | Metropolitan            | 134,080           | 9,890              | 5,180          | 244            | 32          | 52        |
|          | New Malden                    | District                | 9,851             | 6,230              | 3,270          | 36             | 17          | 29        |
|          | Surbiton                      | District                | 8,256             | 7,320              | 4,330          | 45             | 14          | 36        |
| Tolworth | District                      | 4,170                   | 4,180             | 1,980              | 33             | 13             | 22          |           |
| Merton   | Wimbledon                     | Major                   | 37,508            | 11,380             | 4,370          | 101            | 25          | 35        |
|          | Mitcham                       | District                | 4,967             | 7,940              | 2,440          | 28             | 23          | 26        |
|          | Morden                        | District                | 3,340             | 7,520              | 2,660          | 23             | 26          | 24        |
|          | Colliers Wood                 | PotentialDistrict       | 22,900            | 10,710             | 540            | 17             | 1           | 2         |
| Sutton   | Sutton                        | Metropolitan            | 70,593            | 20,140             | 5,490          | 121            | 24          | 50        |
|          | Carshalton Village            | District                | 2,720             | 1,560              | 1,410          | 15             | 6           | 13        |
|          | Cheam Village                 | District                | 4,410             | 1,530              | 2,510          | 34             | 7           | 21        |
|          | North Cheam                   | District                | 3,150             | 9,980              | 1,330          | 24             | 7           | 18        |
|          | Rosehill                      | District                | <b>2,764</b>      | <b>3,264</b>       | <b>1,701</b>   | <b>15</b>      | <b>15</b>   | <b>19</b> |
|          | Wallington                    | District                | 6,000             | 7,060              | 2,290          | 38             | 12          | 25        |
|          | Worcester Park                | District                | 6,800             | 4,690              | 4,260          | 39             | 11          | 31        |
|          | Hackbridge                    | PotentialDistrict       | 547               | 1,223              | 477            | 1              | 1           | 1         |



# ENVIRONMENT

## Traffic growth and congestion

Figure 6.13: Traffic Volumes (million vehicle-km) in SLWP area 2003 to 2018



Source: Department for Transport (DfT) 2019

Table 6.33: Overall volume of vehicular traffic for SLWP boroughs and plan area 2008-2018

|             | Volume of vehicular traffic (million vehicle-km) |              | Change in volume of vehicular traffic from 2008 to 2018 |              |
|-------------|--|--------------|---|--------------|
|             | 2008   | 2018         | million vehicle-km                                      | % change     |
| Croydon     | 1,212  | 1,156        | -56   | -4.6%        |
| Kingston    | 925  | 887          | -38   | -4.1%        |
| Merton      | 621  | 585          | -36   | -5.8%        |
| Sutton      | 640  | 613          | -27   | -4.2%        |
| <b>SLWP</b> | <b>3,398</b>                                     | <b>3,241</b> | <b>-157</b>   | <b>-4.6%</b> |
| London      | 30,273   | 29,539       | -734  | -2.4%        |

Table 6.34: Overall volume of car traffic for SLWP boroughs and plan area 2008-2018

|             | Volume of car traffic (million vehicle-km) |              | Change in volume of car traffic 2008-18 |              |
|-------------|--|--------------|---|--------------|
|             | 2008                                       | 2018         | million vehicle-km                      | % change     |
| Croydon     | 989  | 917          | -72                                     | -7.3%        |
| Kingston    | 766  | 713          | -53                                     | -6.9%        |
| Merton      | 497  | 452          | -45                                     | -9.1%        |
| Sutton      | 525  | 487          | -38                                     | -7.2%        |
| <b>SLWP</b> | <b>2,777</b>                               | <b>2,569</b> | <b>-208</b>                             | <b>-7.5%</b> |
| London      | 23,878                                     | 22,573       | -1305                                   | -5.5%        |

Source: Department for Transport (DfT) 2019

## Modal share

**Table 6.35: Trips trips per day by borough of origin, and modal shares (average day) 2014/15 to 2016/17 for SLWP boroughs and plan area**

|                            | Croydon | Kingston | Merton | Sutton | SLWP         | London |
|----------------------------|---------|----------|--------|--------|--------------|--------|
| Total trips per day (000s) | 755     | 379      | 429    | 392    | <b>1,955</b> | 18,165 |
| Rail                       | 7%      | 8%       | 6%     | 6%     | <b>6.8%</b>  | 5%     |
| Underground                | 0%      | 1%       | 6%     | 1%     | <b>1.7%</b>  | 9%     |
| Bus/tram                   | 16%     | 12%      | 12%    | 10%    | <b>13.1%</b> | 14%    |
| Taxi/other                 | 1%      | 1%       | 1%     | 1%     | <b>1.0%</b>  | 2%     |
| Car/MC                     | 51%     | 42%      | 43%    | 54%    | <b>48.1%</b> | 34%    |
| Cycle                      | 1%      | 4%       | 3%     | 2%     | <b>2.2%</b>  | 3%     |
| Walk                       | 25%     | 33%      | 30%    | 26%    | <b>27.8%</b> | 33%    |

Source: Borough Local Implementation Plan (LIP) performance indicators (TfL, Report 10)

## Road casualties

**Table 6.36: Road casualties, people killed or seriously injured in road traffic collisions 2012-16**

|                                   | Croydon | Kingston | Merton | Sutton | SLWP | London |
|-----------------------------------|---------|----------|--------|--------|------|--------|
| 2005-09 average                   | 141     | 61       | 65     | 70     | 337  | 3,627  |
| 2012                              | 107     | 34       | 65     | 42     | 248  | 3,018  |
| 2013                              | 71      | 37       | 32     | 31     | 171  | 2,324  |
| 2014                              | 71      | 39       | 50     | 29     | 189  | 2,167  |
| 2015                              | 65      | 29       | 36     | 22     | 152  | 2,092  |
| 2016                              | 76      | 38       | 44     | 30     | 188  | 2,501  |
| 2015 to 2016                      | 17%     | 31%      | 22%    | 36%    | 24%  | 20%    |
| 2016 compared to 2005-09 baseline | -46%    | -38%     | -32%   | -57%   | -44% | -31%   |

Source: Borough Local Implementation Plan (LIP) performance indicators (TfL, Report 10)

## Road Network

**Table 6.37: Road classifications in SLWP area**

|             | 'A' Roads including Strategic Red Routes (TfL road network) (km) | Minor Roads including other 'A' Roads, 'B' Roads, 'C' Roads and unclassified local access roads (km) | Total Road Length (km) |
|-------------|--|--|------------------------|
| Croydon     | 78.1 km  | 698.3 km   | 776.4 km               |
| Kingston    | 44.7 km  | 299.4 km   | 344.1 km               |
| Merton      | 42.4 km  | 336.9 km   | 379.3 km               |
| Sutton      | 29.6 km  | 402.3 km   | 431.9 km               |
| <b>SLWP</b> | 194.8 km   | 1736.9 km  | 1931.7 km              |

Source: Department for Transport (DfT) 2019

## Highway asset condition

**Table 6.38: Highway asset condition – percentage of the principal road network length in poor condition and requires maintenance<sup>32</sup> for SLWP boroughs and plan area 2012-16**

|             | 2014-15 | 2015-16 | 2016-17 |
|-------------|---------|---------|---------|
| Croydon     | 33.4%   | 36.3%   | 13.2%   |
| Kingston    | 19.0%   | 17.8%   | 18.2%   |
| Merton      | 15.4%   | 15.9%   | 8.8%    |
| Sutton      | 14.7%   | 16.2%   | 11.9%   |
| <b>SLWP</b> | 20.6%   | 21.6%   | 13.0%   |
| London      | 16.0%   | 15.3%   | 12.6%   |

Source: Borough Local Implementation Plan (LIP) performance indicators (Transport for London, Report 10)

## Air Quality<sup>33</sup>

**Table 6.39: Air Quality Focus Areas within the SLWP area**

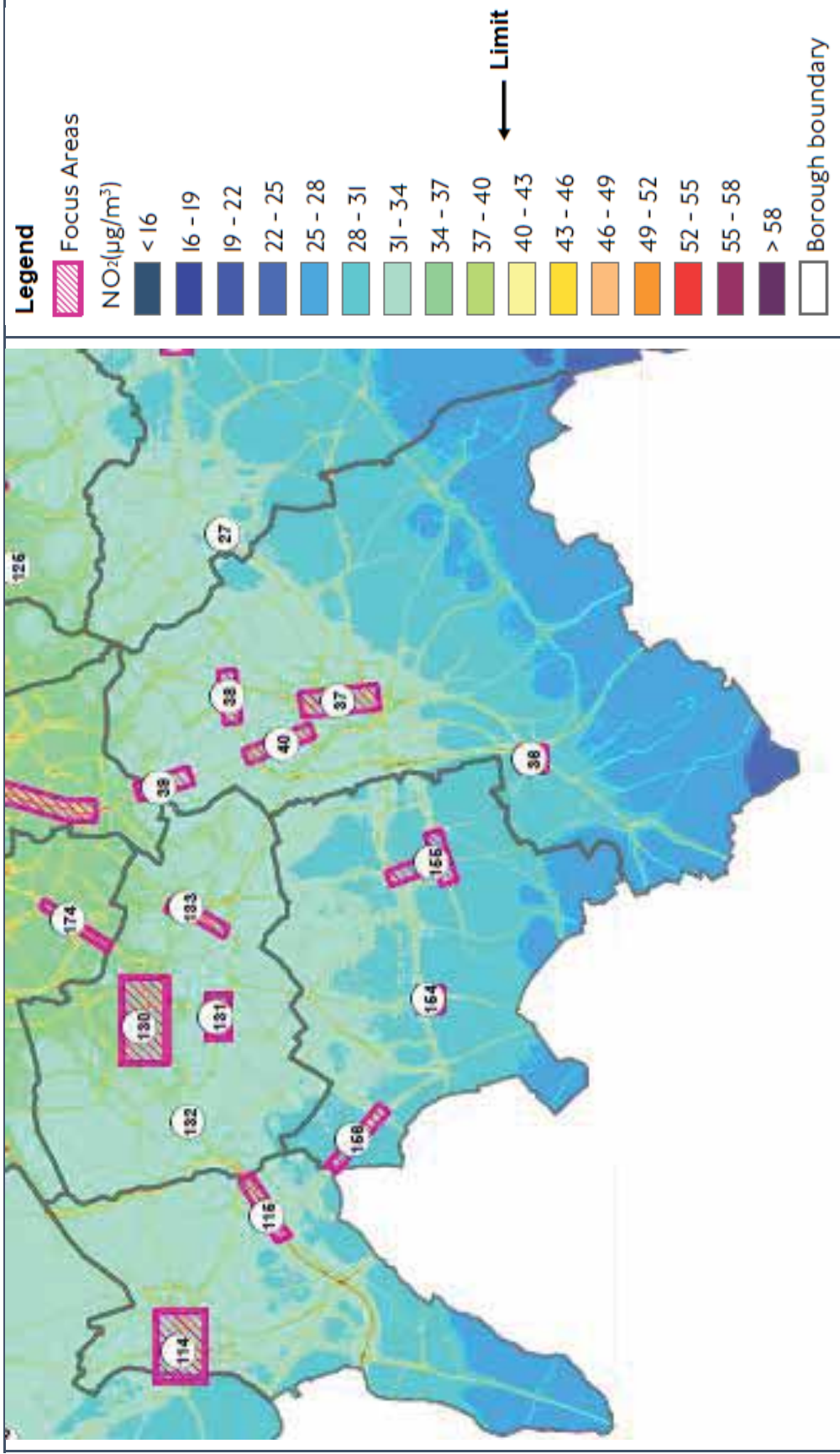
|          | Air Quality Focus Area  |
|----------|---|
| Croydon  | Purley Cross and Russell Hill   |
|          | Wellesley Road  |
|          | Thornton Heath Brigstock Rd/High St/Whitehorse Lane                   |
|          | Norbury London Road   |
|          | London Road between Thornton Heath Pond and St James Road             |
| Kingston | Kingston Bridge/Kingston St/Wheatfield/Kingston Hall Road/London Road |
|          | A3 Kingston Bypass at Malden Junction                                 |
| Merton   | Wimbledon The Broadway/Merton Road/Morden Road/Kingston Road          |
|          | Raynes Park junctions Kingston Road/Bushey Road                       |
|          | Mitcham London Road A216 from Cricket Grn to Streatham Road Jct       |
| Sutton   | Sutton A232 Cheam/Carshalton Rd/High St/Brighton Rd                   |
|          | Wallington Manor Rd/Stanley Pk Rd/Stafford Rd                         |
|          | Central Road/ Cheam Common Road                                       |

Source: GLA Datastore 2019

<sup>32</sup> based on Detailed Visual Inspection survey data

<sup>33</sup> Air Quality Focus Areas are locations that not only exceed the EU annual mean limit value for NO<sub>2</sub> but are also locations with high human exposure. They were defined to address concerns raised by boroughs within the LAQM review process and forecasted air pollution trends

Figure 6.14: Air Quality Focus Areas within the SLWP area



Source: London Atmospheric Emissions Inventory 2016

**Table 6.40: Air quality monitoring results for Croydon in 2018<sup>34</sup>**

| National air quality objective   | Norbury |      | Norbury Manor |      | Park Lane |      | Purley Way (A23) |      |
|--|---------|------|---------------|------|-----------|------|------------------|------|
|  | 2018    | Met? | 2018          | Met? | 2018      | Met? | 2018             | Met? |
| <b>NITROGEN DIOXIDE (NO<sub>2</sub>)</b>   |         |      |               |      |           |      |                  |      |
| 200 ug/m <sup>3</sup> as a 1 hour mean, not to be exceeded more than 18 times a year | 0       | YES  | -             | -    | 0         | YES  | 0                | YES  |
| 40 ug/m <sup>3</sup> as an annual mean   | 49      | NO   | -             | -    | 41        | NO   | 31               | YES  |
| <b>PARTICULATE (PM10)</b>  |         |      |               |      |           |      |                  |      |
| 40 ug/m <sup>3</sup> as an annual mean   | -       | -    | -             | -    | 21        | YES  | -                | -    |
| 50 ug/m <sup>3</sup> as a 24 hour mean, not to be exceeded more than 35 times a year | -       | -    | -             | -    | 1         | YES  | -                | -    |
| <b>PARTICULATE (PM2.5)</b>   |         |      |               |      |           |      |                  |      |
| 25 ug/m <sup>3</sup> as an annual mean   | -       | -    | 12            | YES  | -         | -    | -                | -    |

Source: London Air Quality Network (September 2019)

**Table 6.41: Air quality monitoring results for Kingston in 2018**

| National air quality objective   | Cromwell Road |      | Kingston Vale |      | Tolworth Broadway |      |
|--|---------------|------|---------------|------|-------------------|------|
|  | 2018          | Met? | 2018          | Met? | 2018              | Met? |
| <b>NITROGEN DIOXIDE (NO<sub>2</sub>)</b>   |               |      |               |      |                   |      |
| 200 ug/m <sup>3</sup> as a 1 hour mean, not to be exceeded more than 18 times a year | 1             | YES  | 0             | YES  | 0                 | YES  |
| 40 ug/m <sup>3</sup> as an annual mean   | 55            | NO   | 36            | YES  | 44                | NO   |
| <b>PARTICULATE (PM10)</b>  |               |      |               |      |                   |      |
| 40 ug/m <sup>3</sup> as an annual mean   | 30            | YES  | 22            | YES  | 23                | YES  |
| 50 ug/m <sup>3</sup> as a 24 hour mean, not to be exceeded more than 35 times a year | 15            | YES  | 2             | YES  | 2                 | YES  |
| <b>PARTICULATE (PM2.5)</b>   |               |      |               |      |                   |      |
| 25 ug/m <sup>3</sup> as an annual mean   | -             | -    | -             | -    | -                 | -    |

Source: London Air Quality Network (September 2019)

<sup>34</sup> calendar year from 1 January 2018 to 31 December 2018

**Table 6.42: Air quality monitoring results for Merton in 2018**

| National air quality objective   | Merton Road |      | Morden Civic Centre (2) |      |
|--|-------------|------|-------------------------|------|
|  | 2018        | Met? | 2018                    | Met? |
| <b>NITROGEN DIOXIDE (NO<sub>2</sub>)</b>   |             |      |                         |      |
| 200 ug/m <sup>3</sup> as a 1 hour mean, not to be exceeded more than 18 times a year | -           | -    | 0                       | YES  |
| 40 ug/m <sup>3</sup> as an annual mean   | -           | -    | 48                      | NO   |
| <b>PARTICULATE (PM10)</b>  |             |      |                         |      |
| 40 ug/m <sup>3</sup> as an annual mean   | 32          | YES  | -                       | -    |
| 50 ug/m <sup>3</sup> as a 24 hour mean, not to be exceeded more than 35 times a year | 13          | YES  | -                       | -    |
| <b>PARTICULATE (PM2.5)</b>   |             |      |                         |      |
| 25 ug/m <sup>3</sup> as an annual mean   |             |      |                         |      |

Source: London Air Quality Network (September 2019)

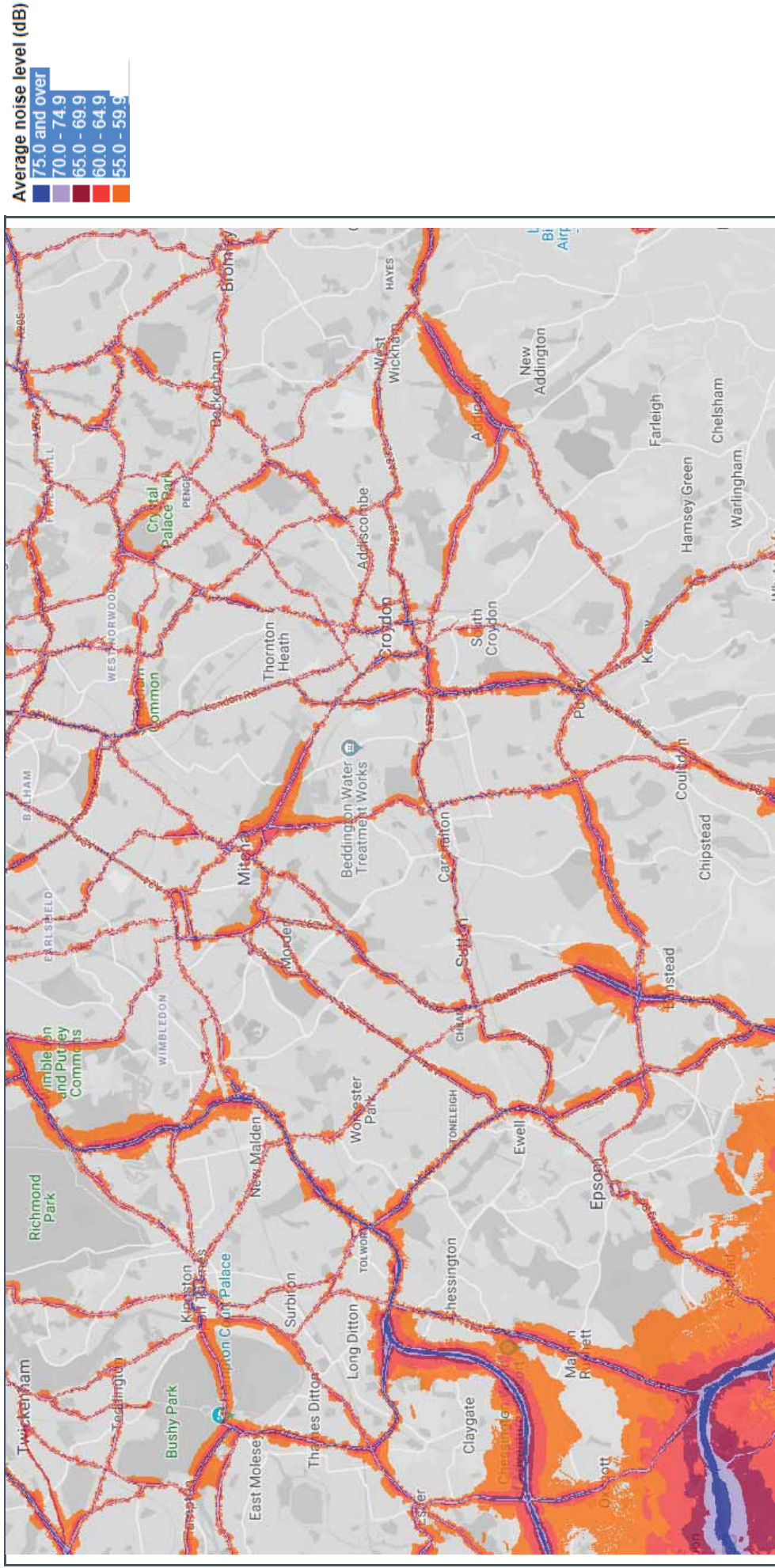
**Table 6.43: Air quality monitoring results for Sutton in 2018**

| National air quality objective   | Beddington Lane |      | Beddington Lane North |      | Wallington |      | Worcester Park |      |
|--|-----------------|------|-----------------------|------|------------|------|----------------|------|
|  | 2018            | Met? | 2018                  | Met? | 2018       | Met? | 2018           | Met? |
| <b>NITROGEN DIOXIDE (NO<sub>2</sub>)</b>   |                 |      |                       |      |            |      |                |      |
| 200 ug/m <sup>3</sup> as a 1 hour mean, not to be exceeded more than 18 times a year | 0               | YES  | 0                     | YES  | 0          | YES  | 7              | YES  |
| 40 ug/m <sup>3</sup> as an annual mean   | 25              | YES  | 29                    | YES  | 47         | NO   | 52             | NO   |
| <b>PARTICULATE (PM10)</b>  |                 |      |                       |      |            |      |                |      |
| 40 ug/m <sup>3</sup> as an annual mean   | 22              | YES  | 22                    | YES  | 23         | YES  | 20             | YES  |
| 50 ug/m <sup>3</sup> as a 24 hour mean, not to be exceeded more than 35 times a year | 7               | YES  | 2                     | YES  | 4          | YES  | 2              | YES  |
| <b>PARTICULATE (PM2.5)</b>   |                 |      |                       |      |            |      |                |      |
| 25 ug/m <sup>3</sup> as an annual mean   | -               | -    | 12                    | YES  | -          | -    | -              | -    |

Source: London Air Quality Network (September 2019)

## Noise exposure

Figure 6.15: Road traffic noise exposure in the SLWP area (Lden)<sup>35</sup>



Source: DEFRA Strategic Noise Mapping 2017

<sup>35</sup> . Lden (day-evening-night) = a 24 hour annual average noise level in decibels with weightings applied for evening and night periods

## Carbon Dioxide (CO<sub>2</sub>) Emissions

Figure 6.16: CO<sub>2</sub> emissions within the SLWP area - TOTAL

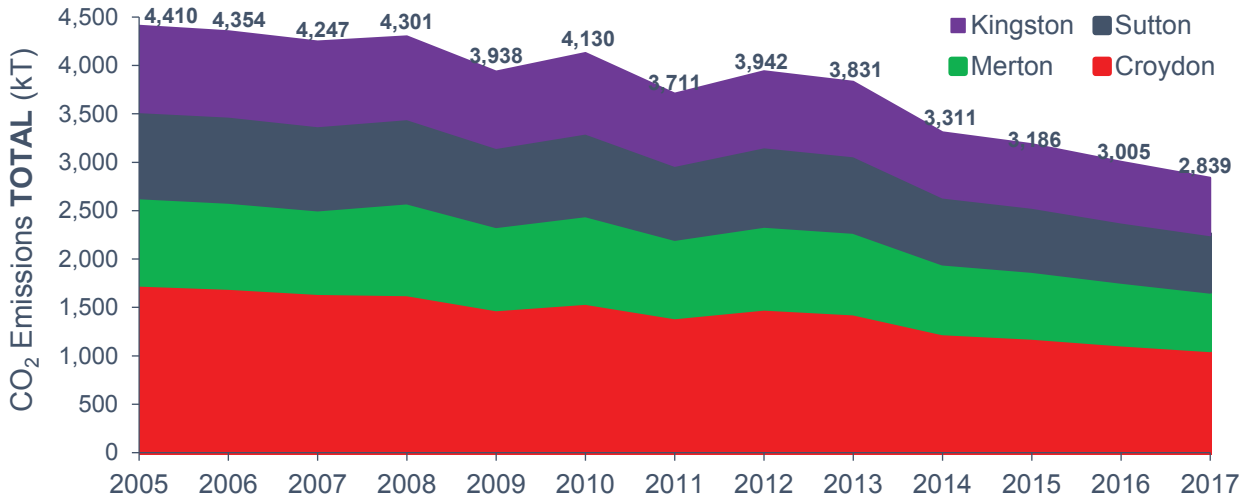


Figure 6.17: CO<sub>2</sub> emissions within the SLWP area - TRANSPORT

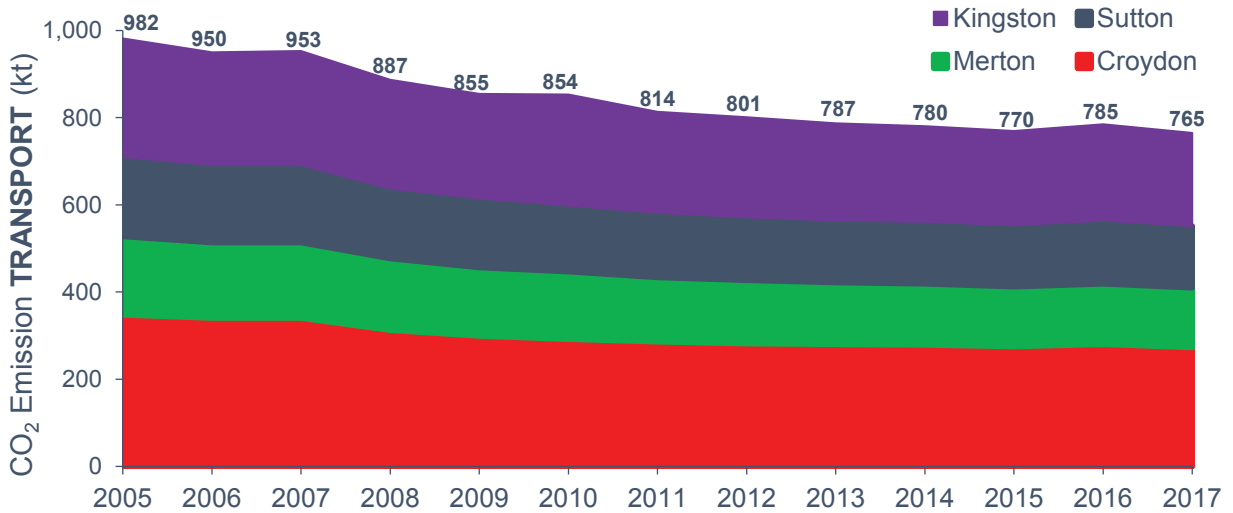
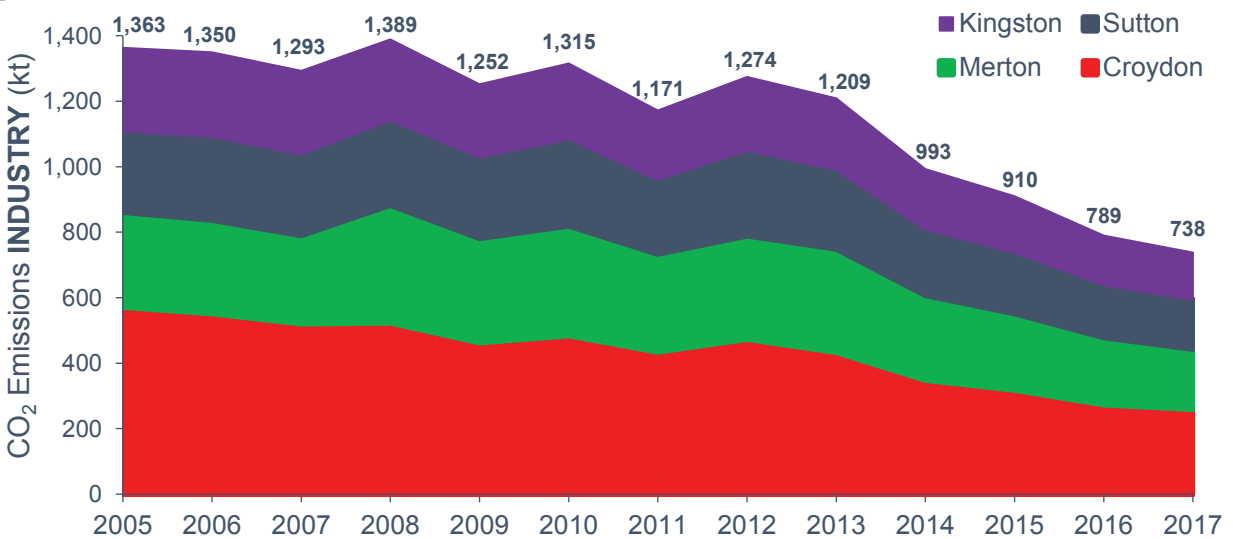


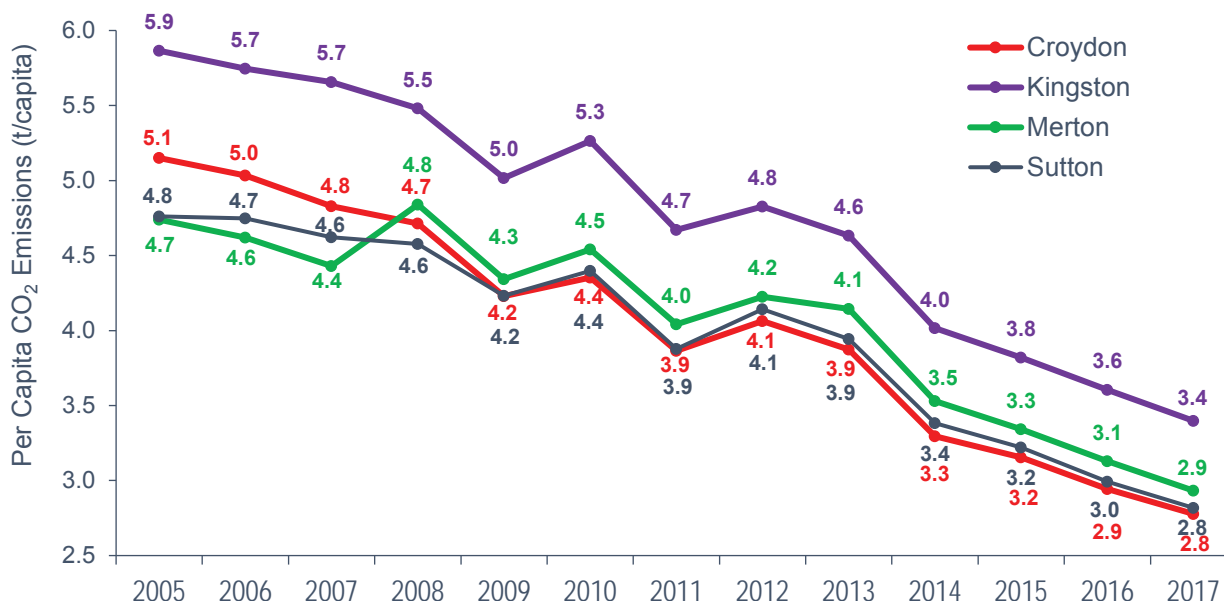
Figure 6.18: CO<sub>2</sub> emissions within the SLWP area - INDUSTRY AND COMMERCE



UK local authority carbon dioxide emissions national statistics for 2005-16 (BEIS, June 2019)



Figure 6.19: Per capita CO<sub>2</sub> emissions within for SLWP boroughs 2005-2017 - total



## Climate Change

Table 6.44: UK climate trends

| 4th Annual State of the UK Climate Report (July 2018) <sup>36</sup> |  |
|---|--|
| •   | 2017 was the 5th warmest year in records dating back to 1910.  |
| •   | Average UK temperatures over the last decade (2008-2017) were 0.8°C warmer than the 1961-1990 average.   |
| •   | In contrast to summer 2018, UK summers have been notably wetter over the last decade (2008-2017), with a 20% increase in rainfall compared to 1961-1990.                       |
| •   | Nine of the ten warmest years in the UK have occurred since 2002, and all of the top ten since 1990.   |
| •   | The Central England Temperature series, which extends back to 1659, shows that the 21 <sup>st</sup> century has so far been warmer than the previous three centuries.;         |
| •   | Although 2017 was not perceived to be a particularly warm year, it was still more than 1°C warmer than the 1961-1990 baseline and ranks fifth warmest year overall for the UK. |
| •   | Mean sea level around the UK has risen at a rate of approximately 1.4 mm per year since the start of the 20 <sup>th</sup> Century. equivalent to a rise of about 16 cm.        |

Source: 4th Annual State of the UK Climate Report (Met Office, July 2018)

Table 6.45: Future Climate Projections

| Change in Climate                                  | UKCP09 Emissions <sup>37</sup> Scenarios in the 2050s |        |                |
|--|---|--------|----------------|
|  | Low Emissions   | Medium | High Emissions |
| <b>TEMPERATURE</b>                                 |   |        |                |
| Increase in <b>winter mean temperature</b>         | +2°C  | +2.2°C | +2.5°C         |
| Increase in <b>summer mean temperature</b>         | +2.5°C  | +2.7°C | +3.1°C         |
| Increase in <b>summer mean daily maximum temp.</b> | +3.5°C  | +3.7°C | +4.3°C         |
| Increase in <b>summer mean daily minm temp.</b>    | +2.7°C  | 2.9°C  | +3.3°C         |
| <b>RAINFALL</b>                                    |   |        |                |
| Change in <b>annual mean precipitation</b>         | 0%  | 0%     | 0%             |
| Change in <b>winter mean precipitation</b>         | +12%  | +14%   | +16%           |
| Change in <b>summer mean precipitation</b>         | - 14%   | - 19%  | -19%           |

Source: UK Climate Impacts Programme Projections (UKCP09,

<sup>36</sup> the Met Office's Annual State of the UK Climate Report provides an up-to-date assessment of UK climate trends, variations and extremes based on the latest available climate quality observational datasets – see <https://www.metoffice.gov.uk/news/releases/2018/state-of-the-climate-2017>

<sup>37</sup> the relevant UKCP18 projections are not yet available at the local level so the corresponding UKCP09 projections are quoted here

## UK Climate Projections 2018 (UKCP18)

According to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC, 2014), atmospheric carbon dioxide (CO<sub>2</sub>) levels in 2011 reached their highest point for almost 1 million years, rising to a new level of over 391 parts per million (ppm) compared to around 280 ppm prior to the industrial revolution. In the northern hemisphere, 1983 -2012 was the warmest 30-year period of the last 1400 years and 13 of the 15 hottest years on record globally have all occurred since 2000.

By April 2018 average CO<sub>2</sub> levels had risen to a new high of 410 ppm. According to a Special Report<sup>38</sup> produced by the IPCC in November 2018, this has contributed to around a 1.0°C increase in average global temperatures since pre-industrial times. The IPCC Special Report concluded that international efforts should stepped up to limit warming to 1.5°C rather than the aspirational 2 °C target set by the Paris Agreement in order to avoid catastrophic impacts on human health, ecosystems, critical infrastructure, water supply and economic growth. However, this can only be achieved if global CO<sub>2</sub> emissions start to fall well before 2030 through rapid and far-reaching transitions in energy supply, land-use, industry and transport.

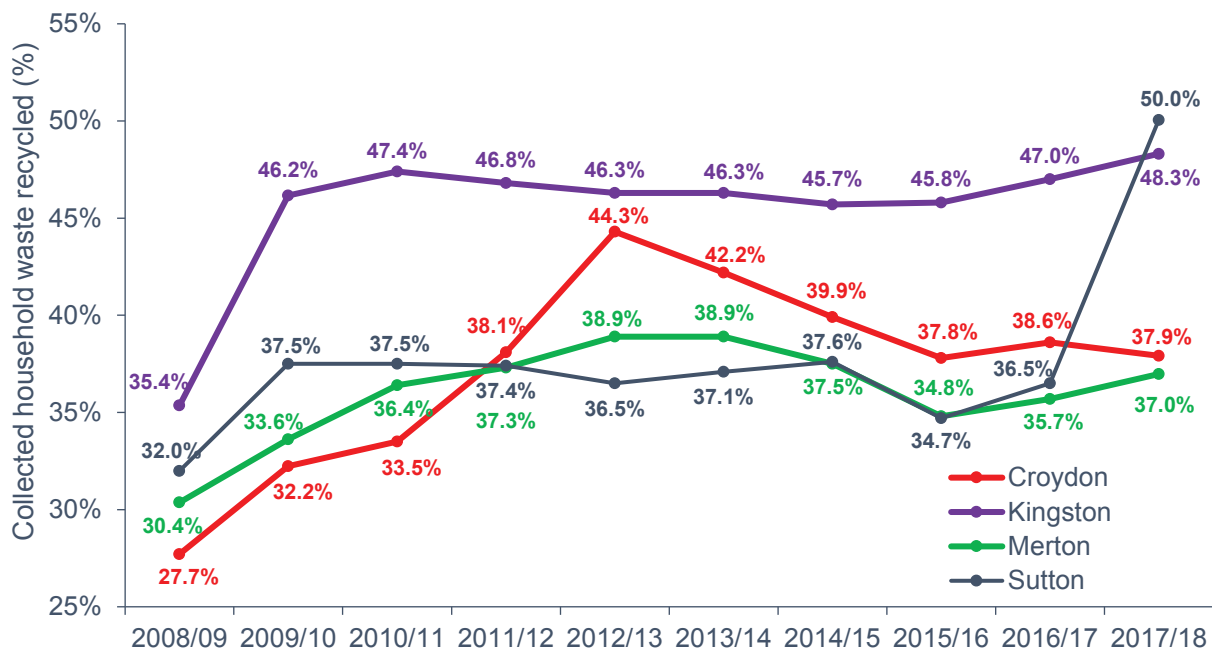
The latest UK Climate Projections 2018 (UKCP18)<sup>39</sup>, published by the Met Office in November 2018, show that:

- by 2070, in the high emission scenario<sup>40</sup>, average warming across the UK is projected to range from 0.9 °C to 5.4 °C in summer, and from 0.7 °C to 4.2 °C in winter.
- hot summers are expected to become more common. In the recent past (1981-2000) the chance of seeing a summer as hot as 2018 was low (<10%). The chance has already increased due to climate change and is now between 10-20%. With future warming, hot summers by mid-century will be even more common (~50%).
- human-induced climate change has made the 2018 record-breaking UK summer temperatures about 30 times more likely than it would be naturally.
- by 2070, in the high emission scenario, average changes in rainfall patterns across the UK are projected to range from -47% to +2% in summer, and between -1% to +35% in winter.
- by the end of the century, sea levels are projected to rise between 0.53m & 1.15m (high emission scenario).

UK Climate Projections 2018 (UKCP18)<sup>41</sup>, published by the Met Office in November 2018

## Household waste recycling rate

Figure 6.20: Household waste recycling rate for SLWP boroughs 2008-09 to 2017-18



<sup>38</sup> the IPCC Special Report is available at [https://www.ipcc.ch/site/assets/uploads/sites/2/2018/07/SR15\\_SPM\\_High\\_Res.pdf](https://www.ipcc.ch/site/assets/uploads/sites/2/2018/07/SR15_SPM_High_Res.pdf)

<sup>39</sup> UKCP18 headline findings at <https://www.metoffice.gov.uk/binaries/content/assets/mohippo/pdf/ukcp18/ukcp18-headline-findings.pdf>

<sup>40</sup> UKCP18 projections provide local low, central and high changes across the UK, corresponding to 10%, 50% and 90% probability levels. Local values are averaged over the UK to give a range of average precipitation change between the 10%- 90% probability levels

<sup>41</sup> UKCP18 headline findings at <https://www.metoffice.gov.uk/binaries/content/assets/mohippo/pdf/ukcp18/ukcp18-headline-findings.pdf>

# Flood Risk

## CROYDON

Figure 6.21: Fluvial flood risk in Croydon - Environment Agency Flood Zones

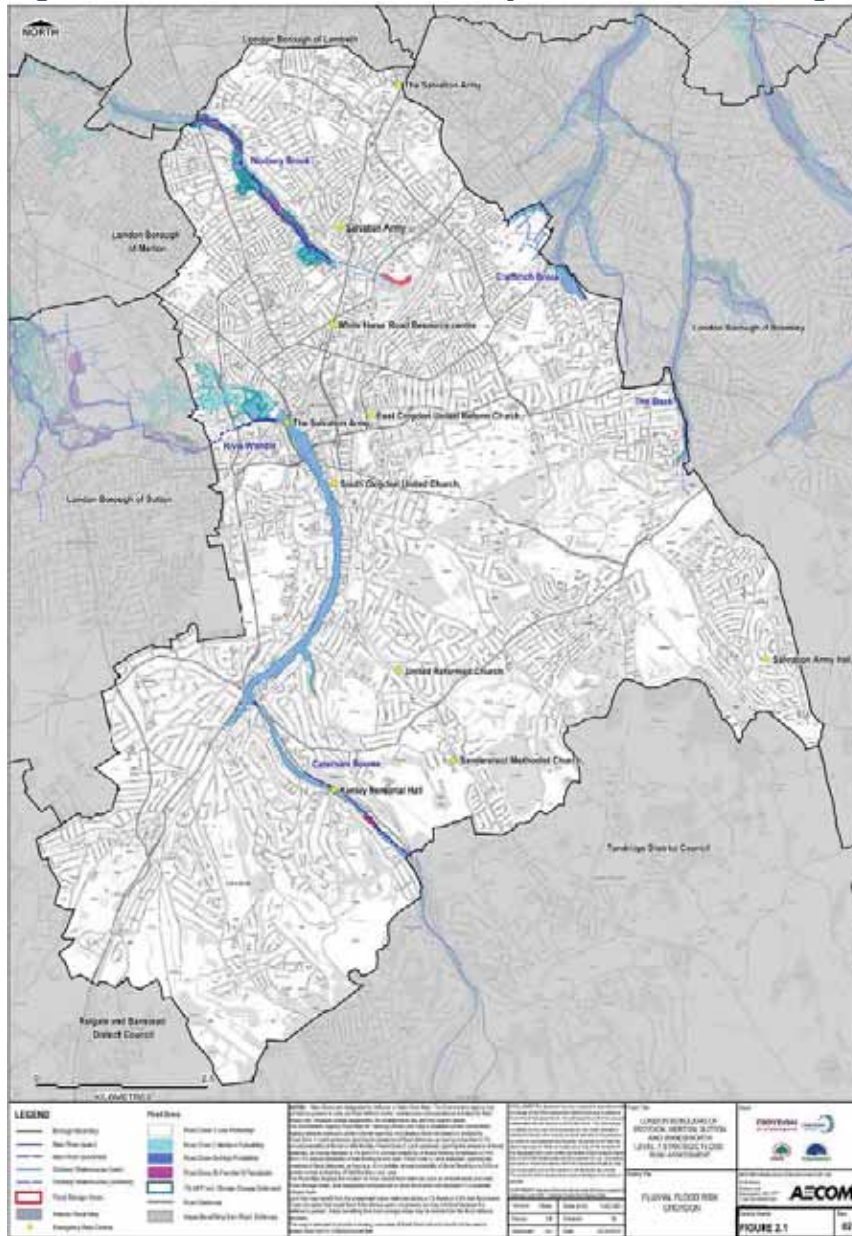
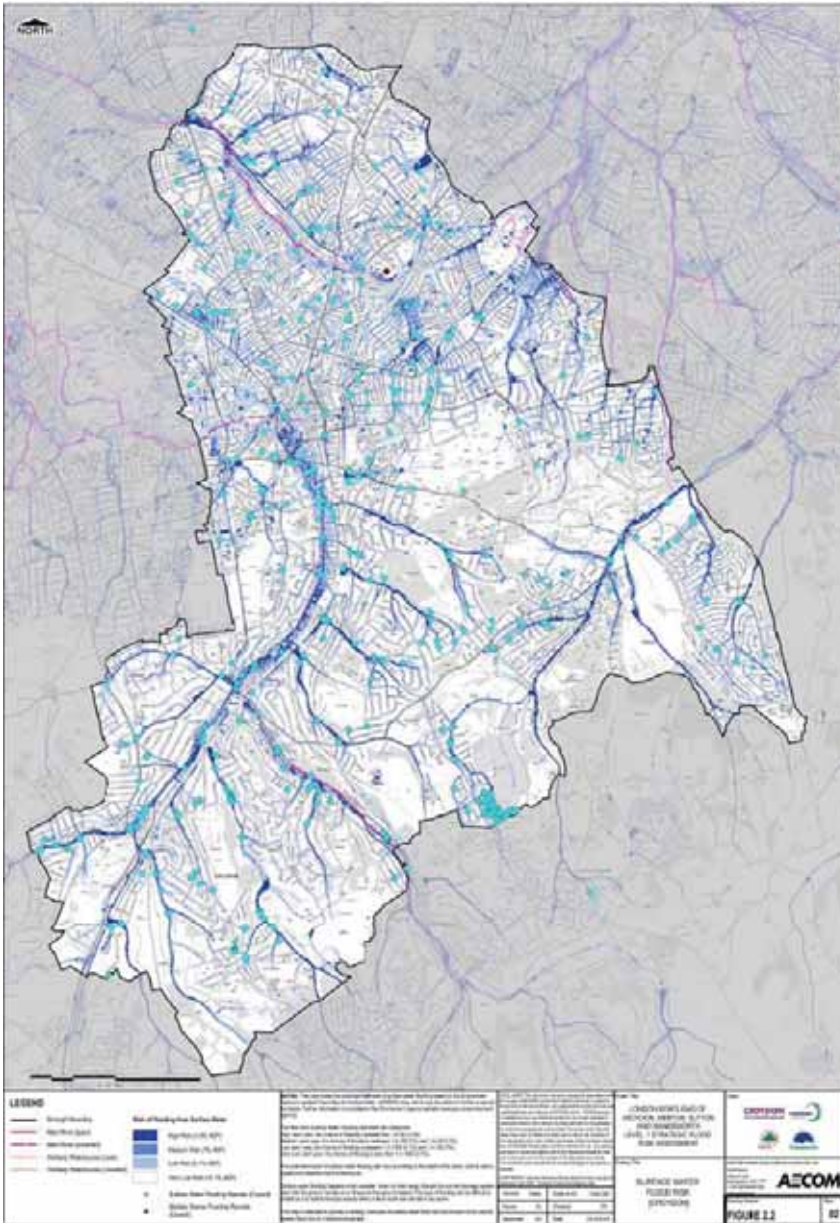


Table 6.46: Fluvial flood risk in Croydon – Properties located within EA Flood Zones

| EA Flood Zone                                  | Flood Risk   | % of Borough | Dwellings | Non-Residential | Unclassified |
|--|--|--------------|-----------|-----------------|--------------|
| <b>Flood Zone 1<br/>Low Risk</b>               | Less than 1 in a 1000 annual probability (<0.1%)           | 97.8%        | 144,140   | 6,149           | 8,649        |
| <b>Flood Zone 2<br/>Medium Risk</b>            | Between 1 in a 100 and 1 in a 1000 annual prob (1% - 0.1%) | 1.7%         | 1,030     | 113             | 107          |
| <b>Flood Zone 3a<br/>High Risk</b>             | More than 1 in a 100 annual probability (>1%)              | <0.5%        | 3,913     | 380             | 326          |
| <b>Flood Zone 3b<br/>Functional Floodplain</b> | More than 1 in 20 annual probability (>5% 'defended').     | <0.5%        | 235       | 48              | 15           |

**Figure 6.22: Surface water flood risk in Croydon based on the Government’s Risk of Flooding from Surface Water (RoFSW) map**



Source: SFRA Level 1 Report (AECOM, December 2015)

**Table 6.47 Surface Water Flooding in Croydon: Dwellings at Risk in the 1 in 100 year event**

| RoFSW <sup>42</sup> Category | Surface Water Flood Risk                                      | Dwellings | Non-Residential | Unclassified |
|------------------------------|---|-----------|-----------------|--------------|
| <b>Low</b>                   | Less than 1 in 100 annual probability (<1%)                   | 32,090    | 1,434           | 1,722        |
| <b>Medium</b>                | Between 1 in 30 and 1 in a 100 annual probability (3.3% - 1%) | 10,094    | 871             | 638          |
| <b>High</b>                  | More than 1 in a 30 annual probability (>3.3%)                | 5,856     | 737             | 513          |

<sup>42</sup> based on the Government’s Risk of Flooding from Surface Water (RoFSW) map (formerly referred to as the updated Flood Map for Surface water (uFMfSW))

# KINGSTON

Figure 6.23: Fluvial flood risk in Kingston - Environment Agency Flood Zones

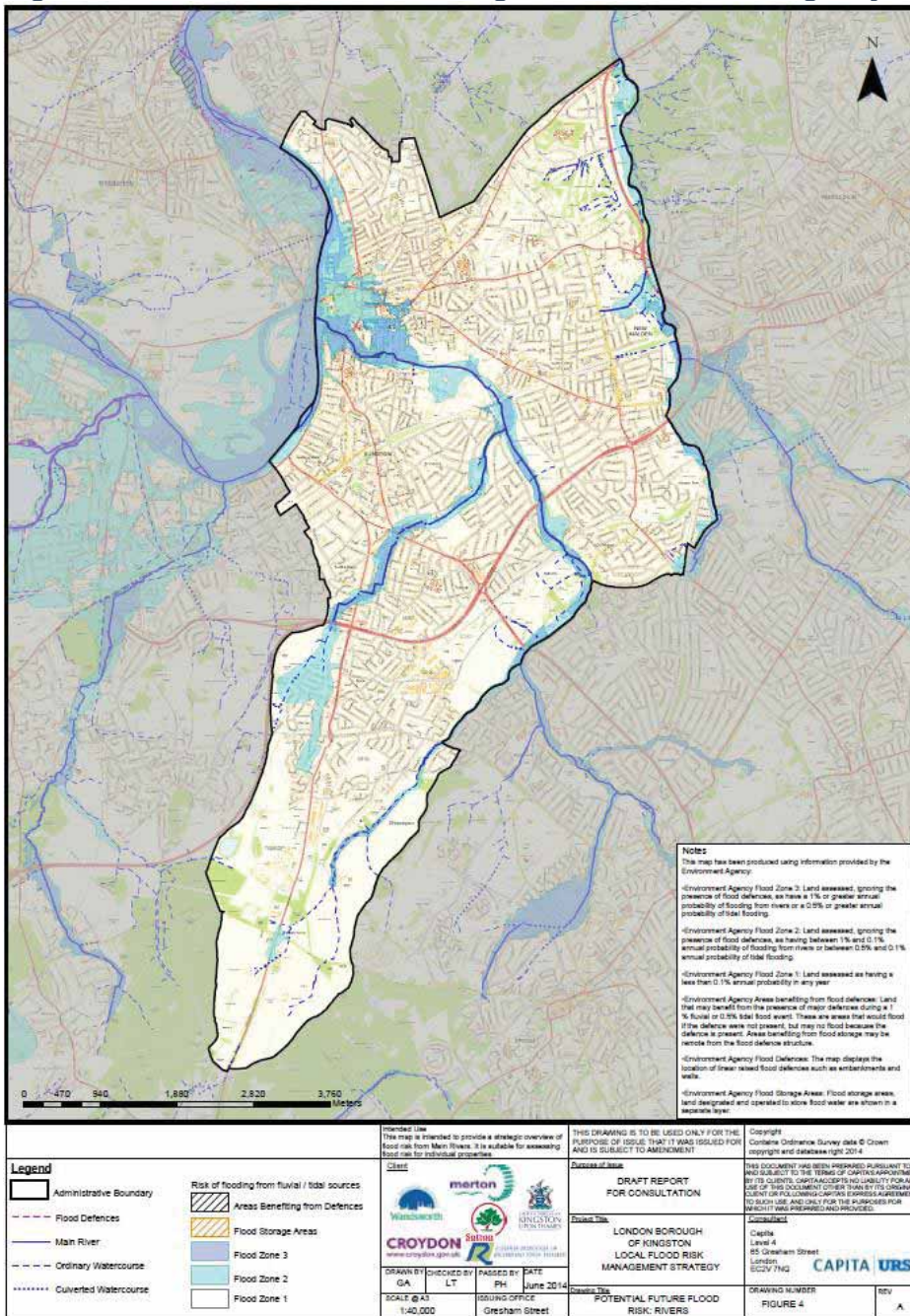


Table 6.49: Fluvial flood risk in Kingston - Properties located within EA Flood Zones

| EA Flood Zone                           | Flood Risk   | Dwellings                 | Non-Residential           | Unclassified              |
|---|--|---------------------------|---------------------------|---------------------------|
| <b>Flood Zone 1<br/>Low Risk</b>        | Less than 1 in a 1000 annual probability (<0.1%)           | <i>data not available</i> | <i>data not available</i> | <i>data not available</i> |
| <b>Flood Zone 2<br/>Medium Risk</b>     | Between 1 in a 100 and 1 in a 1000 annual prob (1% - 0.1%) | <i>data not available</i> | <i>data not available</i> | <i>data not available</i> |
| <b>Flood Zone 3a<br/>High Risk</b>      | More than 1 in a 100 annual probability (>1%)              | <i>data not available</i> | <i>data not available</i> | <i>data not available</i> |
| <b>Flood Zone 3b<br/>FuncFloodplain</b> | More than 1 in 20 annual probability (>5% 'defended').     | <i>data not available</i> | <i>data not available</i> | <i>data not available</i> |

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Figure 6.24: Surface water flood risk in Kingston based on the Government's Risk of Flooding from Surface Water (RoFSW) map

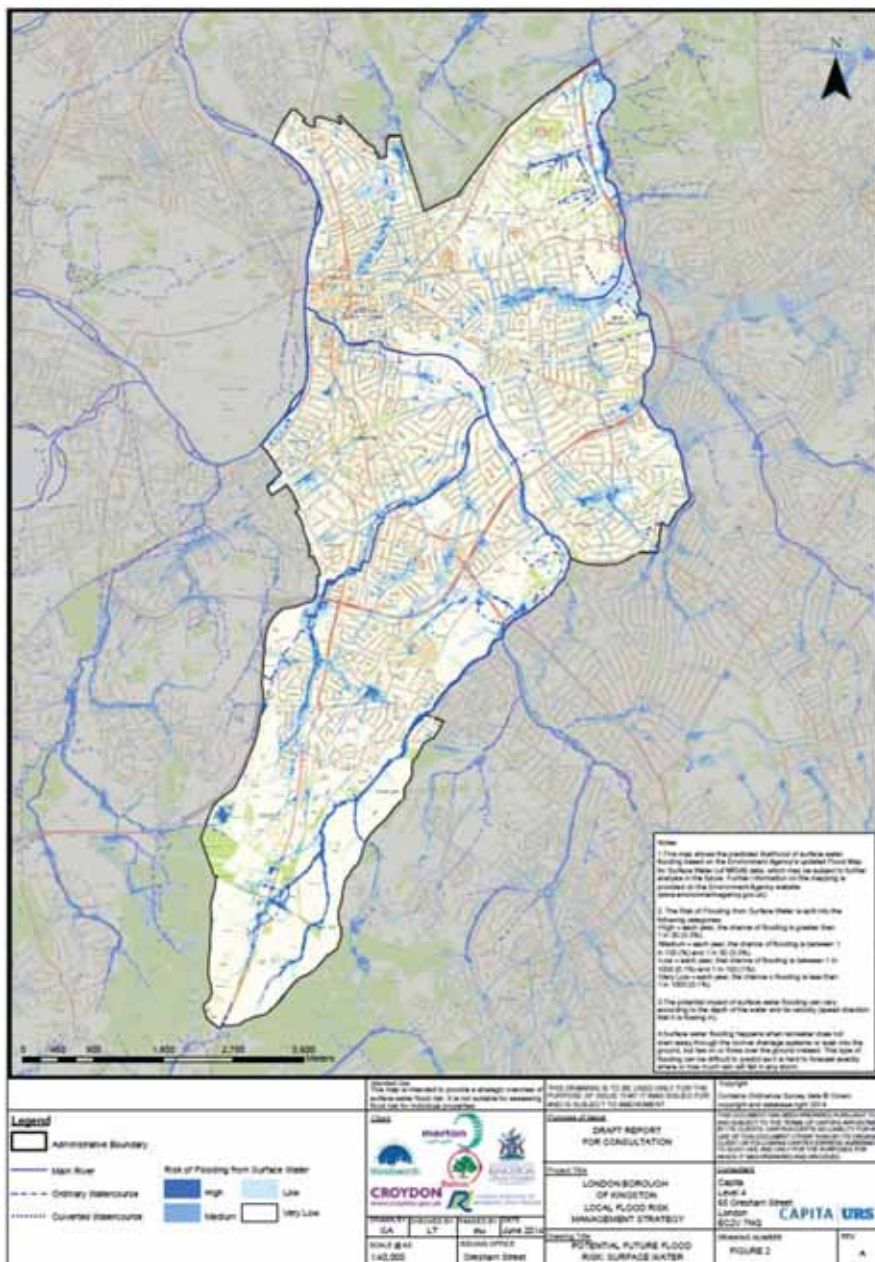


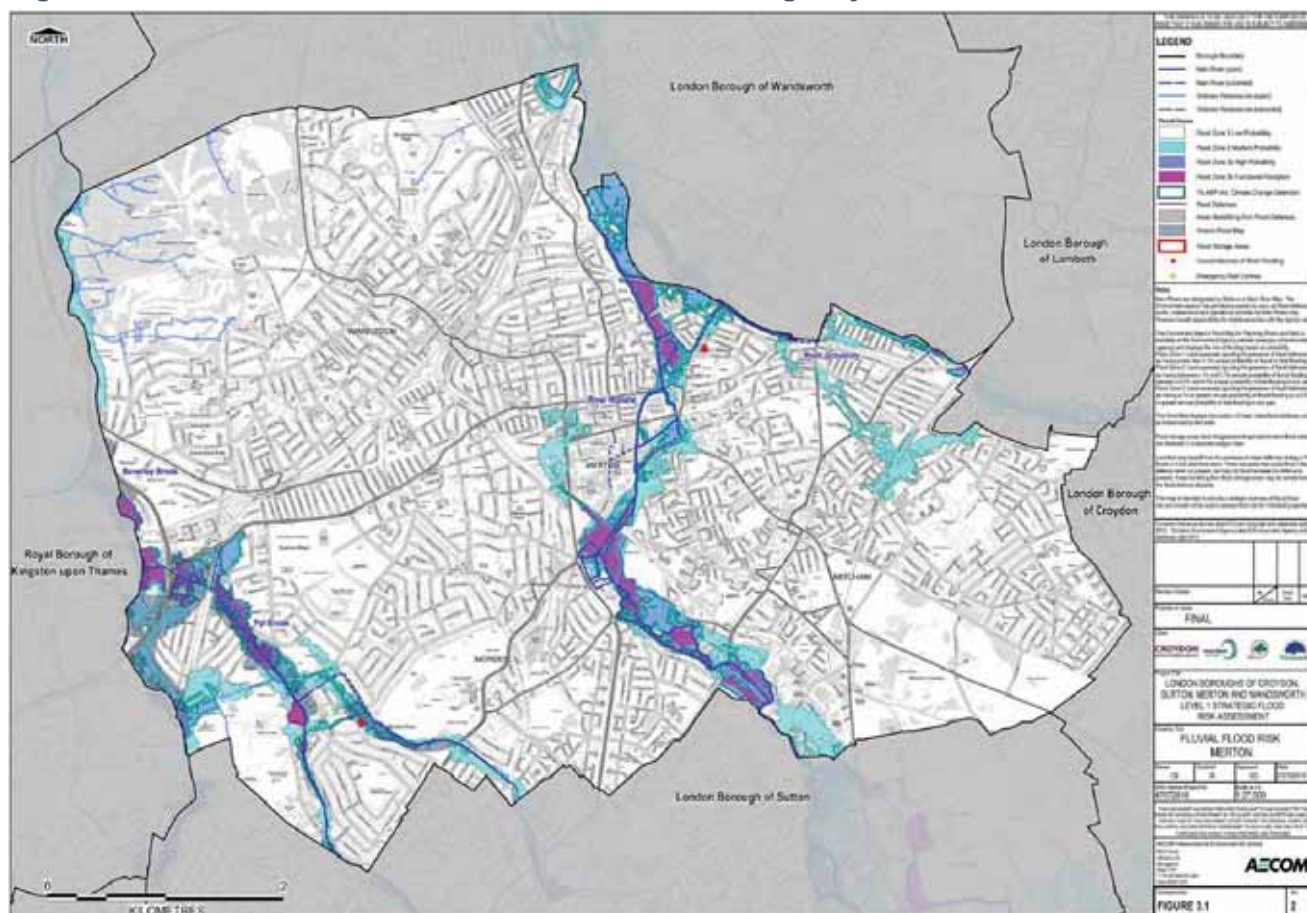
Table 6.50: Surface Water Flooding in Kingston: Dwellings at Risk in the 1 in 100 year event

| RoFSW <sup>43</sup> Category | Surface Water Flood Risk                                      | Dwellings          | Non-Residential    | Unclassified       |
|------------------------------|---|--------------------|--------------------|--------------------|
| Low                          | Less than 1 in 100 annual probability (<1%)                   | data not available | data not available | data not available |
| Medium                       | Between 1 in 30 and 1 in a 100 annual probability (3.3% - 1%) | data not available | data not available | data not available |
| High                         | More than 1 in a 30 annual probability (>3.3%)                | data not available | data not available | data not available |

<sup>43</sup> based on the Government's Risk of Flooding from Surface Water (RoFSW) map (formerly referred to as the updated Flood Map for Surface water (uFMSW))

## MERTON

Figure 6.25: Fluvial flood risk in Merton- Environment Agency Flood Zones



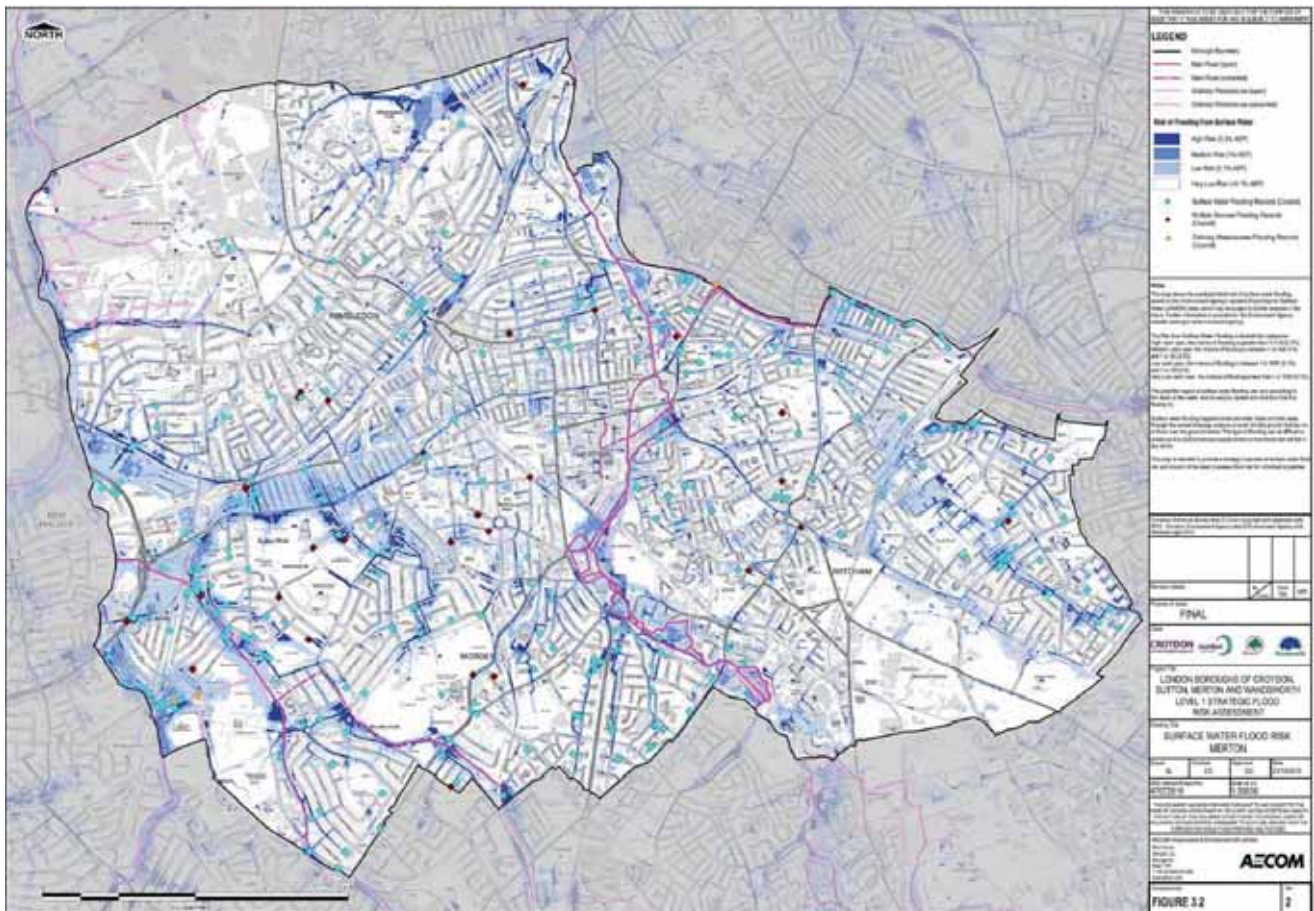
Source: SFRA Level 1 Report (AECOM, December 2015)

Table 6.51: Fluvial flood risk in Merton – Properties located within EA Flood Zones

| EA Flood Zone                                  | Flood Risk   | Land Area of the Borough | Dwellings | Non-Residential | Unclassified |
|--|--|--------------------------|-----------|-----------------|--------------|
| <b>Flood Zone 1<br/>Low Risk</b>               | Less than 1 in a 1000 annual probability of flooding (<0.1%)           | 91.0%                    | 78,864    | 3,698           | 6,496        |
| <b>Flood Zone 2<br/>Medium Risk</b>            | Between 1 in a 100 and 1 in a 1000 annual prob of flooding (1% - 0.1%) | 5.2%                     | 5,106     | 316             | 489          |
| <b>Flood Zone 3a<br/>High Risk</b>             | More than 1 in a 100 annual probability of flooding (>1%)              | 1.9%                     | 1,272     | 101             | 136          |
| <b>Flood Zone 3b<br/>Functional Floodplain</b> | More than 1 in 20 annual probability of flooding (>5% 'defended').     | 1.7%                     | 254       | 20              | 61           |

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

**Figure 6.26: Surface water flood risk in Merton based on the Government’s Risk of Flooding from Surface Water (RoFSW) map**



Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

**Table 6.47: Surface Water Flooding: Dwellings at Risk in Merton in the 1 in 100 year event**

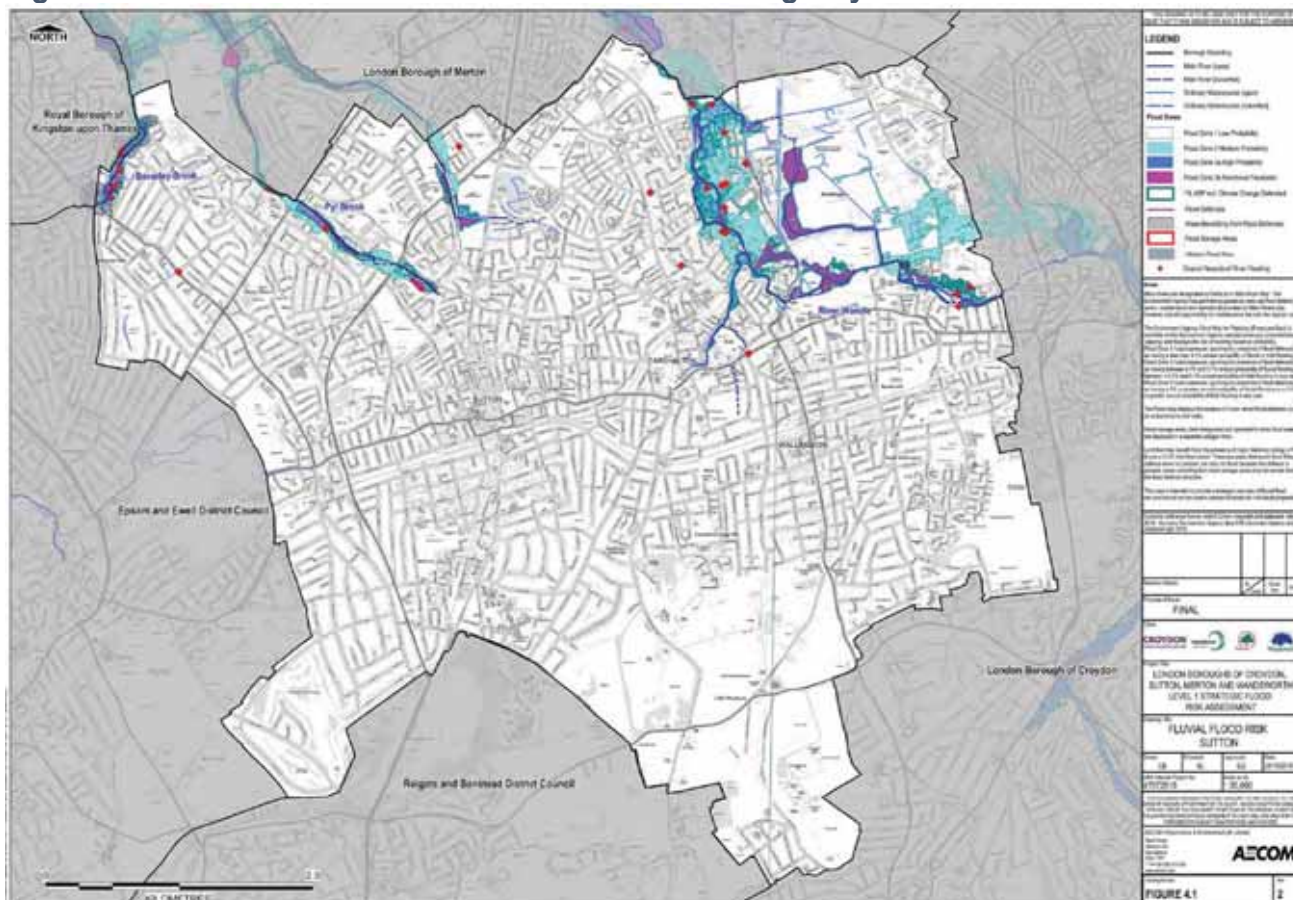
| RoFSW Category | Surface Water Flood Risk  | Dwellings | Non-Residential | Unclassified |
|----------------|---|-----------|-----------------|--------------|
| <b>Low</b>     | Less than 1 in 100 annual probability of flooding (<1%)                   | 19,730    | 1,147           | 1,936        |
| <b>Medium</b>  | Between 1 in 30 and 1 in a 100 annual probability of flooding (3.3% - 1%) | 4,361     | 439             | 190          |
| <b>High</b>    | More than 1 in a 30 annual probability of flooding (>3.3%)                | 1,668     | 176             | 247          |

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)



## SUTTON

Figure 6.27: Fluvial flood risk in Sutton - Environment Agency Flood Zones



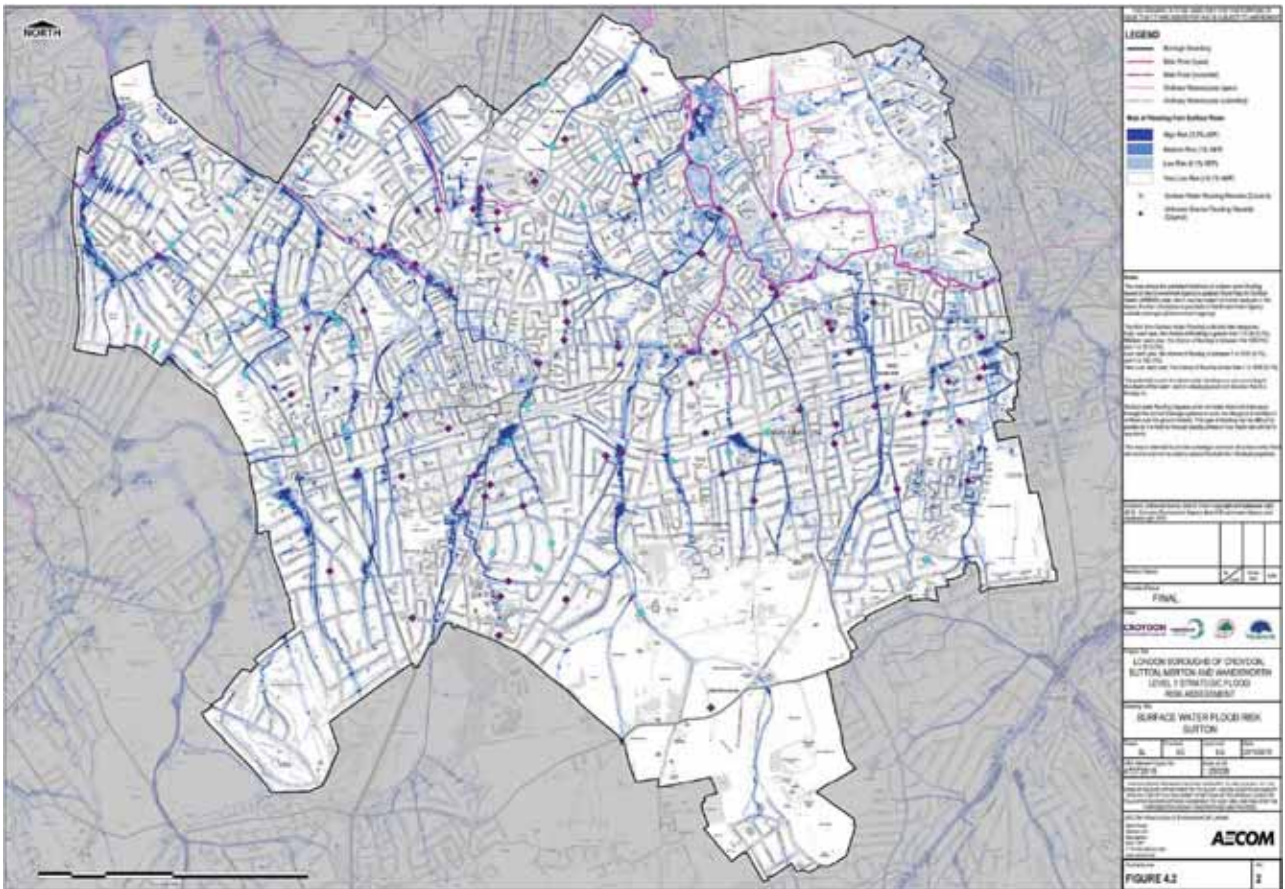
Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Table 6.52: Fluvial flood risk in Sutton – Properties located within EA Flood Zones

| EA Flood Zone                                  | Flood Risk   | Land Area of the Borough | Dwellings | Non-Residential | Unclassified |
|--|--|--------------------------|-----------|-----------------|--------------|
| <b>Flood Zone 1<br/>Low Risk</b>               | Less than 1 in a 1000 annual probability of flooding (<0.1%)           | 96.3%                    | 76,352    | 3,236           | 5,699        |
| <b>Flood Zone 2<br/>Medium Risk</b>            | Between 1 in a 100 and 1 in a 1000 annual prob of flooding (1% - 0.1%) | 2.4%                     | 1,889     | 167             | 181          |
| <b>Flood Zone 3a<br/>High Risk</b>             | More than 1 in a 100 annual probability of flooding (>1%)              | 1.0%                     | 822       | 20              | 43           |
| <b>Flood Zone 3b<br/>Functional Floodplain</b> | More than 1 in 20 annual probability of flooding (>5% 'defended').     | 0.2%                     | 198       | 11              | 20           |

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

**Figure 6.28: Surface water flood risk in Sutton based on the Government's Risk of Flooding from Surface Water (RoFSW) map**



Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

**Table 6.53: Surface Water Flooding in Sutton: Dwellings at Risk in the 1 in 100 year event**

| RoFSW Category | Surface Water Flood Risk  | Dwellings | Non-Residential | Unclassified |
|----------------|---|-----------|-----------------|--------------|
| <b>Low</b>     | Less than 1 in 100 annual probability of flooding (<1%)                   | 15,429    | 870             | 1,078        |
| <b>Medium</b>  | Between 1 in 30 and 1 in a 100 annual probability of flooding (3.3% - 1%) | 4,287     | 325             | 303          |
| <b>High</b>    | More than 1 in a 30 annual probability of flooding (>3.3%)                | 2,860     | 267             | 219          |

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

## Sites of Importance for Nature Conservation (SINCs)

Table 6.54: Sites of importance for nature conservation (SINCs)

|          | Number of SINCs | SINC Area (ha)                       |               |            | SINC as percentage of borough |
|----------|-----------------|--------------------------------------|---------------|------------|-------------------------------|
|          |                 | Statutory Designations <sup>44</sup> | Non-Statutory | Total SINC |                               |
| Croydon  | 74              | 355 ha                               | 1,245 ha      | 1,598 ha   | 18.5%                         |
| Kingston | 38              | 46 ha                                | 361 ha        | 405 ha     | 10.9%                         |
| Merton   | 57              | 322 ha                               | 515 ha        | 836 ha     | 22.2%                         |
| Sutton   | 47              | 37 ha                                | 634 ha        | 688 ha     | 15.7%                         |

Source: Greenspace Information for Greater London (GiGL) (January 2019)

## Species, habitats and ancient woodland

Table 6.55: Species and habitats

|          | Number of species | Priority Habitats | Ancient Woodland (ha) |
|----------|-------------------|-------------------|-----------------------|
| Croydon  | 2,914             | 9/9               | 318.7 ha              |
| Kingston | 2,105             | 8/9               | 31.6 ha               |
| Merton   | 3,761             | 8/9               | 0 ha                  |
| Sutton   | 2,442             | 7/9               | 0 ha                  |

Source: Greenspace Information for Greater London (GiGL) (January 2019)

## Green Belt and Metropolitan Open Land (MOL)

Table 6.56: Green Belt and MOL

|               | Green Belt              |                            | MOL              |                     | Green Belt + MOL as % of borough |
|---------------|-------------------------|----------------------------|------------------|---------------------|----------------------------------|
|               | Area of Green Belt (ha) | Green Belt as % of borough | Area of MOL (ha) | MOL as % of borough |                                  |
| Croydon       | 2,195                   | 25.4%                      | 413              | 4.8%                | 30.2%                            |
| Kingston      | 639                     | 17.2%                      | 545              | 14.6%               | 31.8%                            |
| Merton        | 0                       | 0%                         | 963              | 25.6%               | 25.6%                            |
| Sutton        | 605                     | 13.8%                      | 537              | 12.2%               | 26.0%                            |
| <b>SLWP</b>   | <b>3,439</b>            | <b>16.8%</b>               | <b>2,458</b>     | <b>12.0%</b>        | <b>28.7%</b>                     |
| <b>LONDON</b> | <b>35,109</b>           | <b>22.0%</b>               | <b>15,681</b>    | <b>9.8%</b>         | <b>31.9%</b>                     |

Source: Greenspace Information for Greater London (GiGL) (January 2019)

## Open Space

Table 6.57: Open space

|          | Number of Open Spaces | Open Space Area (ha) | Percentage of Open Space |
|----------|-----------------------|----------------------|--------------------------|
| Croydon  | 362                   | 2,787                | 32.2%                    |
| Kingston | 264                   | 1,378                | 37.0%                    |
| Merton   | 327                   | 1,330 ha             | 35.4%                    |
| Sutton   | 47                    | 688 ha               | 15.7%                    |

Source: Greenspace Information for Greater London (GiGL) (January 2019)

<sup>44</sup> SSSI, SPA, SAC, NNR, Ramsar or LNR

## Green Infrastructure

**Table 6.58: Blue and green space coverage for SLWP boroughs and within the plan area**

|             | Borough area (ha) | Green cover (ha) | Blue cover (ha) | Green & blue cover (ha) | Green cover (%) | Blue cover (%) | Green & blue cvr (%) |
|-------------|-------------------|------------------|-----------------|-------------------------|-----------------|----------------|----------------------|
| Croydon     | 8,649.4           | 4,802.8          | 11.6            | 4,814.4                 | 55.5%           | 0.1%           | 55.7%                |
| Kingston    | 3,726.1           | 1,953.4          | 39.3            | 1,992.7                 | 52.4%           | 1.1%           | 53.5%                |
| Merton      | 3,762.5           | 1,835.4          | 31.9            | 1,867.3                 | 48.8%           | 0.8%           | 49.6%                |
| Sutton      | 4,384.7           | 2,178.8          | 54.8            | 2,233.6                 | 49.7%           | 1.2%           | 50.9%                |
| <b>SLWP</b> | <b>20,522.7</b>   | <b>10,770.4</b>  | <b>137.6</b>    | <b>10,908.0</b>         | <b>52.5%</b>    | <b>0.7%</b>    | <b>53.2%</b>         |

Source: GLA datastore 2019

## Conservation Areas and Historic Environment

**Table 6.59: Conservation Areas for SLWP boroughs and within the plan area**

|          | Conservation Areas | Areas of Special Local Character (ASLCs) | Listed Buildings Grade I, II or II* (at risk) | Locally listed buildings | Scheduled Ancient Monuments | Historic Parks and Gardens |
|----------|--------------------|--|---|--------------------------|-----------------------------|----------------------------|
| Croydon  | 12                 | 24                                       | 150 (6)                                       | 1,000 (apprx)            | 7                           | not available              |
| Kingston | 26 (277 ha)        | 15                                       | 12 (3) <sup>45</sup>                          | 148                      | 6                           | not available              |
| Merton   | 28 (657 ha)        | n/a                                      | 250   | 1,042                    | 3                           | 3                          |
| Sutton   | 15 (208.2 ha)      | 22                                       | 188 (4)                                       | 106                      | 6                           | 5                          |

Source: Historic England and Local Plans

<sup>45</sup> despite the small number of statutory listed buildings in Kingston, there are over 200 designated 'Buildings of Townscape Merit' (BTM)

## 7 KEY SUSTAINABILITY ISSUES (TASK A3)

---

### Identifying key sustainability issues and problems

**7.1** This chapter sets out the key environmental, social and economic issues which need to be taken into account in preparing updated waste policies and proposals for inclusion in the new South London Waste Plan (SLWP). These have been identified on the basis of:

- other policies, plans, programmes and sustainability objectives relevant to or likely to be affected by the new plan as set out in Section 5 of this document;
- the current environmental, social and economic baseline for the four boroughs and future trends, including projected household growth and industrial land supply, over the plan period to 2036 (Section 6);
- existing and planned waste management facilities within South London, annual throughputs of local authority collected waste (household), commercial and industrial (C&I), construction, demolition and excavation waste (CD&E) and other waste streams; waste imports and exports to and from the plan area; and current performance against the London Plan 2016 apportionment (Section 6);
- existing planning constraints and opportunities for promoting sustainable waste management in south London; and
- key sustainability issues identified in government guidance on SA<sup>45</sup>, current best practice and criteria developed previously for the purpose of appraising the existing SLWP, Sutton's Local Plan 2018 and the draft new London Plan.

**7.2** Further sustainability issues may subsequently be identified in the light of feedback from statutory consultees in relation to the SA Scoping Report (this document) and the response to public consultation at the 'Issues and Options' stages.

### Issue 1: Sustainable Waste Management: Self-Sufficiency

**7.3** The key sustainability issues in relation to managing south London's waste arisings up over the plan period from 2021 to 2036 are as follows:

- how much additional land should the plan allocate for sustainable waste management to meet the combined apportionments for household and C&I waste<sup>46</sup> in the draft new London Plan (i.e. net self sufficiency) over the plan period?
- should the plan seek to either:
  - meet the new apportionment targets by safeguarding sufficient land and sites to manage 100% (and no more) of projected household and C&I waste arisings over the plan period to 2036? or
  - seek to exceed the new apportionment targets by allocating additional land, promoting the intensification of existing sites or converting existing waste transfer facilities to waste management facilities?
- to what extent should the plan seek to manage future CD&E or hazardous waste arisings<sup>47</sup> within South London by allocating additional land, promoting the

---

<sup>45</sup> 'SA of Regional Spatial Strategies and Local Development Documents' (ODPM, November 2005)

<sup>46</sup> 887,000 tpa by 2021; 901,250 tpa by 2026; 915,500 by 2031 and 929,750 by 2036

<sup>47</sup> CD&E waste arisings in South London are projected to increase from 523,526 tpa in 2021 to 550,975 tpa in 2036

intensification of existing sites or through specific policy provisions?

## **Issue 2: Sustainable Waste Management: Spatial Strategy and Strategic Approach**

### **7.4** The key sustainability issues are as follows:

- is the spatial strategy and strategic approach of safeguarding and intensifying existing sites the most appropriate strategy compared to the other reasonable alternatives of:
  - safeguarding existing sites and intensifying new sites;
  - safeguarding existing sites and designating preferred industrial areas; or
  - safeguarding existing sites and designating all industrial areas as potential waste sites?
- which existing waste management sites and areas, including those with waste management facilities already in place, other sites allocated in the existing SLWP and industrial areas already identified as potentially suitable for waste facilities, should continue to be safeguarded and therefore carried forward in the new plan?
- which waste sites identified in the existing SLWP have since been developed, permitted and/or allocated for other uses and can no longer contribute towards managing south London's waste?
- how can the waste management capacity of existing waste sites, particularly waste transfer sites, be optimised through the intensification of uses?
- which existing waste management sites and industrial areas identified as potentially suitable for waste facilities have potential for intensification and/or for converting existing waste transfer facilities to waste management operations?
- to what extent can existing waste management facilities, existing site allocations and industrial areas already identified as potentially suitable for waste facilities contribute to meeting the capacity gap over the plan period both with and without the intensification of existing operations?.
- what criteria should be used by to evaluate the suitability of any new waste sites, areas suitable for waste facilities or proposals to increase the capacity of existing sites?
  - the nature of the activity, its scale and location;
  - implementation of the waste hierarchy and contribution to the circular economy.
  - achieving a positive carbon outcome<sup>48</sup>.
  - potential impacts on local amenity, including noise, odours, air quality and visual.
  - proximity to strategic routes and the impact of vehicle movements on local roads.
  - proximity to sustainable modes of transport.
  - physical and environmental constraints, including flood risk.
  - proximity to residential areas and other sensitive receptors e.g. schools
  - job creation and social benefits, including skills, training and apprenticeships.
  - potential for intensification or co-location with complementary industrial/waste uses.
- is the balance between the four boroughs in terms of waste management capacity appropriate given that Sutton (664,641 tpa) and Merton (213,179 tpa) currently

---

<sup>48</sup> the draft new London Plan requires that all energy from waste (EfW) facilities must demonstrate a minimum performance of 400g of CO2 equivalent per kilowatt hour of electricity produced

manage a much larger share of household and C&I waste arisings within the plan area than Kingston (35,642 tpa) and Croydon (32,883 tpa)?

### **Issue 3: Sustainable Waste Management: Prevention, re-use, recycling and recovery**

**7.5** The key sustainability issues are as follows:

- can the plan deliver a further shift away from waste disposal (landfill and incineration without energy recovery) towards practices towards the top of the government's waste hierarchy?
- can the plan further encourage minimisation and prevention through the reuse of materials and using fewer resources in the production and distribution of products?
- How can the plan contribute towards the following targets in the draft new London Plan and London Environment Strategy:
  - the equivalent of 100% of south London's waste is managed within London by 2026 for all waste streams except excavation waste (i.e. net self-sufficiency);
  - zero biodegradable or recyclable waste to landfill by 2026;
  - at least 65% recycling of municipal waste by 2030;
  - 95% reuse/recycling/recovery of construction and demolition waste; and
  - 95% beneficial use of excavation waste

### **Issue 4: Sustainable Waste Management: Promoting the Circular Economy**

**7.6** The key sustainability issues are as follows:

- can the plan help to promote a transition to a circular economy within south London that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible?
- how can the potential economic benefits of the plan be maximised in terms of job creation and supporting the local manufacturing sector by achieving resource efficiency, waste reduction and a significant improvement in reuse and recycling performance<sup>49</sup> (reuse, repair, re-manufacturing and materials innovation)?
- how can the plan support the co-location of complementary uses such as secondary material processing facilities in order to support manufacturing from waste?
- can the plan support prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets?
- should the plan consider introducing a requirement for all major planning applications to achieve 'net zero-waste' and be supported by a Circular Economy Statement?
- should the plan seek to promote technologies that produce fuels that can be used to power waste management and industrial processes (e.g. biofuels and hydrogen)?

### **Issue 5: Climate Change Mitigation**

**7.7** The key sustainability issues are as follows:

- should the policies and proposals of the plan be 'technology neutral' or actively promote the development of energy from waste (EfW) or similar thermal facilities such as anaerobic digestion (AD) in appropriate locations in order to recover low or zero carbon of heat and power from residual<sup>50</sup> waste?

<sup>49</sup> Towards a circular economy, LWARB 2015 and Employment and the circular economy – job creation through resource efficiency in London, LWARB 2015. <http://www.lwarb.gov.uk/what-we-do/accelerate-the-move-to-a-circular-economy-in-london/>

<sup>50</sup> residual waste is that which cannot be re-used, recycled or composted

- should the policies and proposals of the plan actively promote opportunities to use residual waste arisings in south London as a renewable source of energy to power complementary waste management or other industrial processes?
- should the policies and proposals of the plan promote the co-location of waste facilities within identified Heat Network Priority Areas or close to existing or planned district heat networks within south London?
- in the context of the current 'climate emergency'<sup>51</sup>, should the plan go beyond current London Plan policy requirements to further minimise CO<sub>2</sub> emissions on-site through application of the Mayor's updated energy hierarchy and achieve zero carbon standards through developer contributions to a council-managed carbon offset fund?
- should policy measures be included to minimise embodied energy and the 'carbon footprint' associated with construction materials used for new waste management facilities as measured by the BRE's<sup>52</sup> Building life cycle assessment' methodology.
- to what extent should the plan support the co-location of waste management facilities close to existing energy infrastructure to support EfW technologies?

## **Issue 6: Climate Change Adaptation**

**7.8** The key sustainability issues are as follows:

- how can the design and layout of new waste management facilities incorporate green infrastructure and maximise its benefits for a range of adaptation objectives, including flood risk management, urban cooling, mitigation the impact of drought conditions, maintaining biodiversity and habitats and environmental enhancement?
- to what extent can the design and layout of new or upgraded waste management facilities minimise overheating and contribution to the urban heat island (UHI) effect, for example by permeating the development with blue and green spaces and incorporating a range of natural cooling measures as part of the design and layout, including passive design measures (e.g. building orientation), shading, planting and soft landscaping, trees, ponds, SUDS measures and other surface water features?
- should the plan set minimum green infrastructure targets for all new or upgraded waste management facilities and require green roofs wherever feasible?
- what contribution can the plan make towards the Mayor's long-term target for more than 50% of London to be green by 2050?

## **Issue 7: Flood risk, sustainable drainage (SuDS) and water resources**

**7.9** The key sustainability issues are as follows:

- what additional policy measures should be included to minimise all sources of flood risk to and from new and existing waste management sites in south London and to reduce flood risks overall, taking climate change into account?
- to what extent can the 'sequential' and 'exceptions tests' be applied to the identification of waste management sites for inclusion in the new plan, taking account of the latest available information on flood risk in south London<sup>53</sup>?

<sup>51</sup> in July 2019, the London Borough of Sutton declared a climate emergency and a borough target to achieve net zero carbon by 2030

<sup>52</sup> Building Research Establishment

<sup>53</sup> based on the joint strategic flood risk assessment (SFRA) Level 1 and Level 2 reports for Croydon, Merton, Sutton and Wandsworth (AECOM, 2015), the EA's flood map for planning and 'Risk of Flooding from Surface Water (RoFSW)' map



- should the plan include further policy measures to require all waste proposals to incorporate SuDS measures and achieve greenfield run-off rates and volumes?
- how can any residual flood risks arising from waste management sites be safely mitigated through the use of flood resistance or resilience measures where required?
- how can the plan help to ensure that waste facilities and related activities do not adversely affect the quality of watercourses or groundwater within south London?
- how can the plan promote water efficiency measures in existing and new waste facilities having regard to the proximity of vulnerable natural water stores

## **Issue 8: Sustainable design and construction**

**7.10** The key sustainable design and construction issues are as follows:

- should the plan set a minimum BREEAM rating<sup>54</sup> to be met by all new waste management facilities or should this policy requirement take account of the nature of the proposed facility (e.g. sorting and baling facility only, shell buildings or the full-scale redevelopment of a large site)?
- should the plan seek to further minimise environmental life cycle impacts by requiring developers to conducting Life Cycle Assessment and integrating its outcomes in the design decision-making process?
- should the plan include policy criteria to further minimise environmental impacts from construction products<sup>55</sup> ?
- should the plan further encourage responsible sourcing of construction products,?
- should the plan include policy measures to increasing the lifespan of the waste-related buildings through designing for durability and adaptability?
- should the plan include policy criteria to encouraging the reduction of environmental impacts through optimising the use of materials during all stages of the project.

## **Issue 9: Transport**

**7.11** The key sustainable design and construction issues are as follows:

- what further policy measures are needed to minimise HGV movements, traffic congestion, greenhouse gas emissions, local air pollution, noise and vibration associated with waste-related transport within south London?
- to what extent can the plan support sustainable transport objectives by:
  - locating waste management facilities close to where waste is produced?
  - maximising opportunities for the intensification of existing waste sites and industrial areas identified as potentially suitable for waste facilities thus avoiding the need for new waste management sites to be developed and associated trips?
  - co-locating complementary waste management or secondary material processing facilities in line with circular economy principles?
  - promoting the generation of low carbon and renewable energy from waste?
- how can the plan minimise the adverse impacts of waste-related transport movements on local roads and sensitive receptors such as residential areas, schools and recreation areas?

---

<sup>54</sup> the appropriate scheme is currently the BREEAM New Construction 2018

<sup>55</sup> for example through requiring submission of Environmental Product Declarations (EPD)

- is the capacity and condition of the existing local and strategic road network within south London sufficient to accommodate the expected growth in waste-related trips associated with dealing with south London's waste apportionment up to 2036?
- what potential exists for the use of sustainable modes of transport e.g. rail in transporting south London's waste arisings?

## **Issue 10: Air Quality**

**7.12** The key sustainability issues in relation to air quality are:

- how can the policies and proposals of the plan further mitigate the potential impacts of local air pollution arising both from the operation of new and existing waste management facilities and associated transport movements?
- how can the plan contribute towards improving air quality within identified Air Quality Management Areas (AQMAs) and other areas where national standards for particulates (PM10) and nitrogen oxides (NO<sub>x</sub>) are currently being breached?
- what further policy requirements should be incorporated as part of the plan to ensure that proposed waste developments within south London are at least 'air quality neutral' based on the emissions benchmarks set out in the Mayor's Sustainable Design and Construction SPG?
- how can the policies and proposals of the plan:
  - avoid creating any new areas that exceed air quality limits, or avoid delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits?
  - avoid creating unacceptable risks of high levels of exposure to poor air quality, particularly for sensitive receptors?
  - promote the use of design solutions, such as green infrastructure and screening, to prevent or minimise increased exposure to existing air pollution?
  - promote an 'air quality positive approach' to waste related developments which maximises benefits to local air quality.
- to what extent can the plan require potentially polluting waste management operations such as the sorting of recyclables to be enclosed?
- what locational criteria should be used for assessing the suitability of sites in terms to the proximity of sensitive receptors (e.g. residential properties, schools and recreation areas) to potential sources of air pollution associated with waste facilities?
- in seeking to mitigate the potential impacts of local air pollution on sensitive receptors, can the plan maintain a 'technology neutral' approach to the development of waste management facilities?
- to what extent should the plan should allocate broad types of facility to each site e.g. enclosed, open and enclosed with a chimney etc?

## **Issue 11: Environmental protection**

**7.13** The key issues in relation to minimising the potentially adverse impacts of waste management facilities on environmental quality and local amenity are as follows:

- should the plan include policy criteria to mitigate the adverse effects of noise, vibration, odour and dust on nearby sensitive land-uses during both the construction and operational phases of new or upgraded waste management facilities?

- what locational criteria should be used to assess the suitability of new waste management facilities in terms of the proximity of sensitive receptors<sup>56</sup> to noise, vibration and odours generated during both the construction and operational phases;
- should the plan set out common requirements in relation to the content of Construction Environmental Management Plans submitted in support of proposals for new waste management facilities across the four partner boroughs?
- how can the plan limit potential pollution associated with the operation of waste management facilities and its potentially adverse impacts on neighbouring uses?
- what further policy measures should be included to reduce the number and total area of contaminated sites within south London requiring remediation?
- what further policy measures or criteria should be included in the plan to further prioritise the re-use of previously-developed ('brownfield'), derelict or underused land/ premises within south London for waste management uses?

## **Issue 12: Biodiversity and Habitats**

**7.14** The key sustainability issues in relation to biodiversity and habitats are as follows:

- is the plan likely to have a 'significant' effect upon the protection or integrity of a 'European site' as defined in the UK Habitats Regulations 2010 - including any Special Areas of Conservation (SACs) or Special Protection Areas (SPAs)?
- what approach should be followed in screening the plan at the issues and options stage to determine whether or not a Habitats Regulations Assessment (HRA)<sup>57</sup> needs to be carried out?
- which European sites are in sufficiently close proximity to the south London plan area to be considered for the purpose of HRA screening
  - Richmond Park SAC;
  - Wimbledon Common SAC;
  - Mole Gap to Reigate Escarpment SAC; and
  - Ockham and Wisley Commons SSSI (part of Thames Basin Heaths SPA)?
- how should the plan ensure that new and existing waste management facilities minimise any potential impacts upon regionally or locally designated wildlife sites?
- how will the plan potentially affect local Biodiversity Action Plan (BAP) targets in relation to priority habitats and species within each of the four partner boroughs;
- how can the waste plan maximise the area of habitat created, improved or managed as a consequence of waste related developments and promote opportunities for enhancing river catchments and local green corridor networks.

## **Issue 13: Local Economy and Employment**

**7.15** The key sustainability issues are as follows:

- how can the plan's effectiveness be maximised in promoting investment, local employment opportunities and the competitiveness of the waste management sector within South London, particularly by promoting the circular economy and new waste management technologies nearer the top of the waste hierarchy?

---

<sup>56</sup> 'sensitive receptors' include residential properties, schools, workplaces and recreation areas

<sup>57</sup> also known as 'Appropriate Assessment'

- in order to ensure that employment land supply matches demand across the four boroughs, and given that most industrial uses<sup>58</sup> have a significantly higher jobs density than waste management uses, should the plan seek to retain employment land for industrial uses within strategic industrial locations (SIL) and established industrial areas, and therefore no longer identify these areas as potentially suitable for waste management uses (provided that sufficient sites can be allocated to meet the apportionment up to 2036)
- how much industrial land and floorspace within the four south London boroughs and across the wider Wandle Valley Property Market Area (including Wansdworth) should be retained or potentially released for waste related uses having regard to (a) the need to maintain a sufficient supply of land and premises to meet current and future demands for industrial (non-waste-related) and related functions; and (b) the borough-level categorisations in Table 6.2 of the London Plan which identifies that Sutton should 'provide capacity' and that the other three boroughs should 'retain capacity' for non-waste related industrial uses.
- to what extent should the plan promote co-ordination initiatives with London Remade and other partners to ensure that sufficient volumes of recyclable materials are generated to make domestic manufacturing from waste viable?
- in promoting south London's transition towards a circular economy, how can the plan maximise economic benefits to local communities in the form of new products, employment and low carbon energy for example through managing waste more locally by optimising existing facilities and building new reuse and recovery facilities?
- what is the potential contribution of the plan in promoting south London's economy, facilitating innovation and competitiveness and supporting existing businesses to expand and new business to start-up (particularly SMEs)

#### **Issue 14: Townscape and visual amenity**

**7.16** The key sustainability issues are as follows:

- how can the plan ensure that new waste management facilities are constructed to high quality design principles that respect local character and do not adversely affect local townscape?
- how can the plan ensure that the siting and design of waste management facilities has no adverse impacts on the number and quality of Conservation Areas within south London?
- how can the plan ensure that the plan preserves and enhances the quality and distinctiveness of south London's historic environment and cultural assets?
- how can the plan minimise the number of new waste management facilities located within areas of designated landscape value?

---

<sup>58</sup> these are generally uses falling within the Use Classes B1(b) research & development, B1(c) light industrial; B2 industrial and manufacturing; and B8 storage & distribution and therefore appropriate forms of development within SILs and established industrial areas

## **Issue 15: Human health and quality of life**

**7.17** The key sustainability issues are as follows:

- how should the plan protect and enhance local amenity and the quality of the townscape for residents living near new and existing waste management facilities?
- how should the plan minimise the potentially adverse impacts of waste related developments, transport and associated activities on public health?
- how can the plan minimise the risk of accidents involving waste vehicles and ensure the safe operation of waste management facilities for employees and visitors
- how can the design and layout of waste management facilities integrate 'designing out crime' principles and contribute to public perceptions of safety
- how can the policies and proposals of the plan help to ensure that new or upgraded waste management facilities within south London promote inclusive designs
- how can the amenity and quality of life of local residents be balanced against the operational requirements of new or upgraded waste management facilities within south London, particularly within areas affected by social deprivation
- is the current level of protection for the permanence, integrity and openness of Green Belt and Metropolitan Open Land (MOL) within the four boroughs sufficient?
- how should the plan minimise the loss of public open space and ensure that there is no increase in the area of public open space deficiency as a consequence of waste related development?
- should the plan include policy criteria to further minimise potential visual intrusion of waste related developments on nationally or locally important landscapes?
- how can the plan ensure that waste related developments do not adversely affect strategic views from within and from outside the plan area?

## **Issue 16: Equalities, Accessibility and Social Inclusion**

**7.18** The key sustainability issues are as follows:

- what criteria should be identified as the basis for carrying out an Equalities Impact Assessment (EqIA) on the emerging plan?
- how can the plan address the need to enhance public access for all groups of the population, including equalities groups, to reuse and recycling centres accepting household waste within South London?
- how can the plan further promote social inclusion by addressing potential inequalities arising as a result of current waste management arrangements in south London.
- In what ways can the plan address fuel poverty issues?
- should the plan maximise the potential for locating waste management facilities within easy access of areas of social deprivation (as measured by the employment and income domains of the Government's Index of Multiple Deprivation) and thus providing new employment opportunities in the waste management sector?
- how can the plan preparation process increase the overall extent of ongoing public involvement in the waste planning process in south London?
- what is the potential contribution of the plan to achieving an increase in public awareness of sustainable waste management issues?

- what benefits can the plan deliver to local communities in the form of new products, employment and low carbon energy by managing more waste locally, optimising existing waste facilities and building new reuse and recovery facilities?
- how can the policies and proposals of the plan help to address inequalities, particularly within areas affected by social deprivation, encourage social cohesion and promote inclusive neighbourhoods?
- how can the plan help to promote job opportunities for all?
- what benefits can the plan deliver to local communities in the form of new products, employment and low carbon energy by managing more waste locally, optimising existing waste facilities and building new reuse and recovery facilities?

## 8 SUSTAINABILITY APPRAISAL FRAMEWORK FOR THE SOUTH LONDON WASTE PLAN (TASK A4)

---

### Developing Sustainability Objectives, Indicators and Targets

**8.1** A comprehensive range of sustainability objectives, indicators and targets has been identified for the purpose of appraising emerging South London Waste Plan (SLWP) options, taking into account other policies, plans, programmes identified in Section 5 (Task A1); the environmental baseline in Section 6 (Task A2); and the key issues identified in Section 7 (Task A3). The proposed SA Framework reflects the aims of national planning policy, the Mayor's Environmental Strategy, the draft London Plan and local planning objectives.

**8.2** As shown in Table 8.1, the SA Framework covers 16 broad topic areas arranged under the four categories of (a) sustainable waste management (b) climate change (c) environmental quality, and (d) community well-being.

**8.3** The full SA Framework, including sustainability objectives, appraisal questions, indicators and a cross reference to the key issues identified in Section 7, is set out in Table 8.2. It should be noted that the SA Framework will inevitably overlap to some extent with the emerging aims and objectives of the plan itself - particularly in relation to the waste hierarchy and self-sufficiency targets for South London.

### Scoring system

**8.4** The proposed scoring system for use in the appraisal of emerging plan options, including significance ratings, is set out below in Figure 8.1.

**Figure 8.1: Scoring system for use in the appraisal**

| Symbol | Scale of effect          |
|--------|--------------------------|
| ++     | Major beneficial effect. |
| +      | Minor beneficial effect. |
| -      | Neutral or no effect.    |
| X      | Minor negative effect.   |
| X      | Major negative effect.   |
| ?      | Uncertain.               |

### Plan monitoring

**8.5** At the conclusion of the plan-making process, it is intended that the SA Framework will provide the basis for monitoring the effectiveness of the adopted plan in meeting its objectives over the plan period. As with the current SLWP, the primary mechanism of reporting on plan implementation will be through the preparation of Authority Monitoring

**Table 8.1: Summary of the proposed SA Framework**

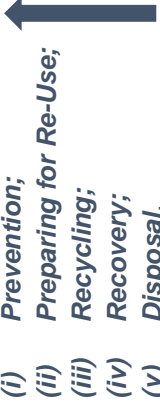
|  |
|--|
| <p><b>(A) SUSTAINABLE WASTE MANAGEMENT</b></p>   |
| <p><b>(1) Net Self-sufficiency</b><br/>To provide sufficient sites and waste management facilities to deal with all waste streams making up South London’s apportionment over the plan period.</p> <p><b>(2) Spatial Strategy and Strategic Approach</b><br/>To optimise and intensify the capacity of new and existing waste management sites in order to make the most efficient use of available industrial land.</p> <p><b>(3) Waste re-use, recycling and recovery</b><br/>To drive waste management up the waste hierarchy by promoting re-use, recycling and recovery</p> <p><b>(4) Circular economy</b><br/>To promote a transition to a circular economy within south London.</p>                                 |
| <p><b>(B) CLIMATE CHANGE</b></p>   |
| <p><b>(5) Climate Change Mitigation</b><br/>To address the causes of climate change by minimising CO2 emissions from waste facilities</p> <p><b>6) Climate Change Adaptation</b><br/>To ensure that all waste management facilities are fully adapted to the impacts of climate change</p> <p><b>7) Flood risk and sustainable drainage (SuDS)</b><br/>To avoid, reduce and manage flood risk to or from waste management facilities</p> <p><b>(8) Sustainable Design and Construction</b><br/>To promote the highest standards of sustainable design and construction in new waste management facilities</p>  |
| <p><b>(C) ENVIRONMENTAL QUALITY</b></p>  |
| <p><b>(9) Transport</b><br/>To reduce trips, traffic congestion and pollution arising from waste –related HGV movements</p> <p><b>(10) Air Quality</b><br/>To minimise air pollution and impacts on sensitive land-uses arising from waste facilities</p> <p><b>(11) Environmental protection</b><br/>To minimise the adverse impacts of noise, vibration, dust, light, soil contamination and water pollution during both the construction and operational phases</p> <p><b>(12) Biodiversity and Habitats</b><br/>To protect and enhance biodiversity, habitats and green corridors within the plan area and avoid potentially significant impacts upon nearby ‘European sites’ covered by the EU Habitats Directive</p> |
| <p><b>(D) COMMUNITY WELL-BEING</b></p>   |
| <p><b>(13) Local Economy and Employment</b><br/>To promote local employment opportunities, and the competitiveness of the waste management sector within South London</p> <p><b>(14) Townscape and Visual Amenity</b><br/>To minimise the potentially adverse impacts of waste management facilities on townscape quality and visual amenity by promoting high standards of design and layout .</p> <p><b>(15) Human Health and Quality of Life</b><br/>To minimise the potentially adverse impacts of waste management facilities on human health and protect the open environment</p> <p><b>(16) Equalities, Accessibility and Social Inclusion</b><br/>To reduce exclusion, address inequalities &amp; improve</p>      |



## PROPOSED SUSTAINABILITY APPRAISAL FRAMEWORK FOR THE SOUTH LONDON WASTE PLAN

| SA Objective  | Appraisal Questions   | Indicators   | Issue Ref             |
|---|---|--|-----------------------|
| <b>(A) SUSTAINABLE WASTE MANAGEMENT</b>   |   |  |                       |
| <p><b>Objective 1: Net self-sufficiency</b><br/>To provide sufficient sites and waste management facilities to deal with all waste streams making up South London's apportionment over the plan period</p>                    | <ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal help to provide sufficient sites and waste management facilities in south London to meet the combined apportionment targets<sup>59</sup> for household and commercial &amp; industrial (C&amp;I) waste over the plan period?</i></li> <li>➤ <i>Will the policy or proposal help to provide sufficient sites and waste facilities to manage other waste arisings, including construction, demolition &amp; excavation (CD&amp;E) waste and hazardous waste, over the plan period?</i></li> <li>➤ <i>Will the policy or proposal reduce waste arisings needing to be managed by promoting waste reduction, reuse and manufacturing from waste?</i></li> <li>➤ <i>Will the policy or proposal reduce the proportion of recyclable waste exported outside the plan area?</i></li> </ul> | <ul style="list-style-type: none"> <li>➤ current and future household, C&amp;I, CD&amp;E and hazardous waste arisings in south London over the plan period (tpa)</li> <li>➤ number, site area (ha) and capacity (tpa) of new and existing waste management facilities within south London by facility type and waste stream.</li> <li>➤ combined tonnage of household and C&amp;I waste managed within south London as a proportion of total arisings and the London Plan apportionment (tpa) (%)</li> <li>➤ tonnage of other waste streams managed as a proportion of arisings, including CD&amp;E and hazardous waste (%).</li> <li>➤ number of allocated and windfall sites developed for new waste management facilities, intensification of uses or for manufacturing from waste respectively (ha)</li> <li>➤ tonnage of waste recyclable waste exported outside the plan area (tpa)</li> </ul> | Section 7,<br>Page 75 |
| <p><b>Objective 2: Spatial strategy and strategic approach</b><br/>To optimise and intensify the capacity of new and existing waste management sites in order to make the most efficient use of available industrial land</p> | <ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal help to optimise and intensify the capacity of waste management sites and other industrial uses within south London compared to reasonable alternatives?</i></li> <li>➤ <i>Will the policy or proposal facilitate linked trips and optimise the location of new waste management facilities with respect to proximity to strategic routes, sustainable modes of transport, physical and environmental constraints, residential areas and other sensitive receptors?</i></li> <li>➤ <i>Will the policy or proposal optimise the distribution of waste management sites within south London?</i></li> </ul>   | <ul style="list-style-type: none"> <li>➤ number of sites and area of employment land intensified for waste management uses, complementary uses such as manufacturing from waste or other industrial uses (ha)</li> <li>➤ increased tonnage of waste managed on intensified waste management sites by waste stream (LACW, C&amp;I and CD&amp;E) and in total (tpa)</li> <li>➤ number and area of existing waste transfer sites converted to waste management operations (ha)</li> <li>➤ proximity of new or upgraded waste management to strategic routes, sustainable modes of transport, physical and environmental constraints, residential areas and other sensitive receptors (m)</li> </ul>   | Section 7,<br>Page 76 |

<sup>59</sup> the draft new London Plan 2017 887,000 tpa by 2021; 901,250 tpa by 2026; 915,500 by 2031 and 929,750 by 2036  
South London Waste Plan: SA Scoping Report (September 2019)

| SA Objective   | Appraisal Questions  | Indicators   | Issue Ref                     |
|--|--|--|-------------------------------|
| <p><b>Objective 3: Waste re-use, recycling and recovery</b><br/>To drive waste management up the waste hierarchy by promoting re-use, recycling and recovery</p> | <p>➤ <b>Will the policy or proposal help to deliver a shift away from waste disposal towards practices towards the top of the government's waste hierarchy?</b></p> <p>(i) <b>Prevention;</b><br/> (ii) <b>Preparing for Re-Use;</b><br/> (iii) <b>Recycling;</b><br/> (iv) <b>Recovery;</b><br/> (v) <b>Disposal.</b></p>  | <p>➤ tonnage and proportion of south London's waste arisings respectively prepared for re-use, recycled or recovered by waste stream (tpa) (%)</p> <p>➤ number and proportion of waste developments achieving a shift away from waste disposal towards practices towards the top of the government's waste hierarchy</p> <p>➤ tonnage and proportion of biodegradable or recyclable waste sent to landfill (tpa) (%)</p> <p>➤ tonnage and proportion of household and C&amp;I waste recycled (tpa) (%)</p> <p>➤ tonnage and proportion of CD&amp;E waste re-used, recycled or recovered (tpa) (%)</p> <p>➤ proportion of excavation waste put to beneficial uses (%)</p> <p>➤ performance against the following revised targets for re-use, recycling and recovery in the new London Plan</p> <ul style="list-style-type: none"> <li>- the equivalent of 100% of south London's waste is managed within the plan area by 2026 for all waste streams except excavation waste;</li> <li>- zero biodegradable or recyclable waste to landfill by 2026;</li> <li>- at least 65% recycling of municipal waste by 2030;</li> <li>- 95% reuse/recycling/recovery of construction and demolition waste; and</li> <li>- 95% beneficial use of excavation waste</li> </ul> | <p>Section 7,<br/>Page 77</p> |

| SA Objective  | Appraisal Questions   | Indicators  | Issue Ref                     |
|---|---|---|-------------------------------|
| <p><b>Objective 4: Circular economy</b><br/>To promote a transition to a circular economy within south London</p>   | <ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal promote the circular economy within south London?</i></li> <li>➤ <i>Will the policy or proposal improve efficiency and innovation to keep products and materials at their highest use for as long as possible?</i></li> <li>➤ <i>Will the policy or proposal support manufacturing from waste and the co-location of complementary uses in industrial areas such as secondary material processing facilities?</i></li> <li>➤ <i>Will the policy or proposal promote technologies that produce fuels that can be used to power waste management and industrial processes?</i></li> <li>➤ <i>Will the policy or proposal ensure that any energy from waste (EfW) facilities meet and exceed the Mayor's carbon intensity floor target?</i></li> </ul>                   | <ul style="list-style-type: none"> <li>➤ number and proportion of planning applications for waste management facilities supported by a Circular Economy Statement</li> <li>➤ tonnage and proportion of waste prepared for re-use, recycled or recovered by waste stream (tpa) (%)</li> <li>➤ number and capacity of manufacturing from waste facilities developed within south London (tpa)</li> <li>➤ number and capacity of waste facilities developed producing fuels that can be used to power waste management and industrial processes (tpa)</li> </ul> | <p>Section 7,<br/>Page 77</p> |
| <b>(B) CLIMATE CHANGE</b>   |   |   |                               |
| <p><b>Objective 5: Climate Change Mitigation</b><br/>To address the causes of climate change by minimising CO<sub>2</sub> emissions from waste facilities</p> | <ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal promote the co-location of energy from waste (EfW) facilities within Heat Network Priority Areas or close to existing or planned district heat networks in south London?</i></li> <li>➤ <i>Will the policy or proposal further promote the use of residual waste arisings with south London as a renewable energy source to power complementary waste management or other industrial processes?</i></li> <li>➤ <i>Will the policy or proposal promote technologies producing fuels that can be used to power waste management and industrial processes?</i></li> <li>➤ <i>Will the policy or proposal minimise embodied energy and the 'carbon footprint' associated with construction materials used for new or upgraded waste management facilities?</i></li> </ul> | <ul style="list-style-type: none"> <li>➤ net carbon dioxide (CO<sub>2</sub>) reductions delivered by waste management facilities (tpa)</li> <li>➤ number and capacity of waste management facilities promoting the use of residual waste arisings as a renewable source of energy to power complementary waste management or other industrial processes</li> <li>➤ number and proportion of waste facilities (a) achieving BREEAM 'Excellent'; and (b) minimising embodied energy under the BRE's Building life cycle assessment methodology</li> </ul>       | <p>Section 7,<br/>Page 77</p> |

| SA Objective  | Appraisal Questions   | Indicators  | Issue Ref                 |
|---|---|---|---------------------------|
| <p><b>Objective 6: Climate Change Adaptation</b></p> <p>To ensure that all waste management facilities are fully adapted to the impacts of climate change</p> | <p>➤ <i>Will the policy or proposal help to ensure that new or upgraded waste management facilities incorporate green infrastructure and maximise its benefits for flood risk management, urban cooling, resilience to drought, biodiversity and other climate adaptation objectives?</i></p>   | <p>➤ number and proportion of new or upgraded waste management facilities achieving the Mayor's minimum Urban Greening Factor (UGF)<sup>60</sup> score of 0.3 according to Policy G5 and Table 8.2 of the draft new London Plan.</p> <p>➤ proportion of new or upgraded waste management facilities incorporating a green roof and achieving at least a 10% increase in green coverage compared to baseline conditions prior to development.</p> <p>➤ number and proportion of new or upgraded waste management facilities complying with the Mayor's sustainable design and construction SPG as amended.</p>   | <p>Section 7, Page 78</p> |
| <p><b>Objective 7: Flood risk and sustainable drainage (SuDS)</b></p> <p>To avoid, reduce and manage flood risk to or from waste management facilities</p>    | <p>➤ <i>Will the policy or proposal help to avoid inappropriate development in flood risk areas?</i></p> <p>➤ <i>Will the policy or proposal ensure that the design and layout of the waste management sites preserves the ecological functioning of river corridors, enhance local amenity and avoid any net loss of floodplain storage?</i></p> <p>➤ <i>Will the policy or proposal minimise surface water run-off from new waste management facilities by incorporating sustainable urban drainage systems (SUDS), managing run-off as close to its source as possible and aiming to achieve greenfield run-off rates?</i></p> | <p>➤ number and proportion of new or upgraded waste management facilities located within Environment Agency (EA) flood zones 2, 3a and 3b.</p> <p>➤ number and proportion of new or upgraded waste management facilities located within areas at higher risk of surface water flooding according to the EA's 'Risk of Flooding from Surface Water (RoFSW)' map.</p> <p>➤ number and proportion of new or upgraded waste management facilities incorporating SuDS measures.</p> <p>➤ number and proportion of new or upgraded waste management facilities achieving greenfield run-off rates<sup>61</sup></p> <p>➤ number and proportion of new or upgraded waste management facilities incorporating flood resistance or resilience measures in line with Government guidance and EA Standing Advice.</p> | <p>Section 7, Page 78</p> |

<sup>60</sup> alternatively the London Borough of Sutton's green space factor (GSF) in Local Plan Policy 33 can be used i.e. 'the number and proportion of new or upgraded waste management facilities achieving an increased green space factor (GSF) score of 0.2

<sup>61</sup> for all flood events up to and including the 1 in 100 year event (including 35% for climate change)

| SA Objective  | Appraisal Questions   | Indicators   | Issue Ref          |
|---|---|--|--------------------|
| <p><b>Objective 8: Sustainable Design and Construction</b><br/>To promote the highest standards of sustainable design and construction in new waste management facilities</p> | <ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal help to promote the highest standards of sustainable design and construction in new waste management facilities?</i></li> <li>➤ <i>Will the policy or proposal help to minimise environmental life cycle impacts by requiring developers to conduct Life Cycle Assessments as part of the design process</i></li> <li>➤ <i>Will the policy or proposal promote the use of responsibly sourced construction materials<sup>62</sup> with lower environmental impact?</i></li> </ul> | <ul style="list-style-type: none"> <li>➤ number and proportion of new or upgraded waste management facilities achieving an ‘Excellent’ or ‘Very Good’ rating under the appropriate BREEAM scheme<sup>63</sup></li> <li>➤ number and proportion of new or upgraded waste management facilities subjected to Life Cycle Assessment as part of the design process?</li> <li>➤ number and proportion of new or upgraded waste management facilities promoting the use of responsibly sourced construction materials with lower environmental impact</li> </ul>   | Section 7, Page 79 |
| <b>(C) ENVIRONMENTAL QUALITY</b>  |   |  |                    |
| <p><b>Objective 9: Transport</b><br/>To reduce trips, traffic congestion and pollution arising from waste-related transport movements</p>                                     | <ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal help to minimise trips, traffic congestion and pollution arising from waste-related transport movements?</i></li> <li>➤ <i>Will the policy or proposal minimise the adverse impacts of waste-related transport movements on local roads and sensitive receptors such as residential areas, schools and recreation areas by safeguarding and locating new waste management facilities close to the strategic road network?</i></li> </ul>  | <ul style="list-style-type: none"> <li>➤ <i>traffic flows on the strategic road network and local roads by vehicle type based on Department for Transport (DfT) and Transport for London (TfL) data (vehicle-km per annum)</i></li> <li>➤ <i>number of new or upgraded waste management facilities located in close proximity to the strategic road network (i.e. within 400m)</i></li> <li>➤ <i>number of new or upgraded waste management facilities located in close proximity to sensitive receptors such as residential areas, schools and recreation areas (i.e. within 400m)</i></li> <li>➤ <i>number of waste sites intensified thus avoiding the need for new sites to developed and associated trips</i></li> <li>➤ <i>number and capacity of complementary uses introduced on waste sites, such as manufacturing from waste, with potential to enable ‘linked trips’</i></li> </ul> | Section 7, Page 79 |

<sup>62</sup> for example through requiring submission of Environmental Product Declarations (EPD)

<sup>63</sup> the appropriate scheme is currently the BREEAM New Construction 2018

| SA Objective  | Appraisal Questions   | Indicators   | Issue Ref                     |
|---|---|--|-------------------------------|
| <p><b>Objective 10: Air Quality</b><br/>To minimise air pollution and impacts on sensitive land-uses arising from waste facilities</p>  | <ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal help to minimise or reduce local air pollution from new or upgraded waste management sites and associated transport movements?</i></li> <li>➤ <i>Will the policy or proposal contribute towards meeting national air quality objectives for nitrogen dioxide (NO2), particulates (PM10) and ozone and avoid any further deterioration in air quality particularly within air quality management areas (AQMAS) and 'Air Quality Focus Areas'?</i></li> <li>➤ <i>Will the policy or proposal help to promote design solutions such as green infrastructure and screening, in order to prevent or minimise increased exposure to air pollution?</i></li> </ul> | <ul style="list-style-type: none"> <li>➤ NO<sub>2</sub> (nitrogen dioxide) levels in µg/m<sup>3</sup> (Target: 200 µg/m<sup>3</sup> as a 1-hour mean no more than 18 days per year)</li> <li>➤ PM10<sup>64</sup> levels in µg/m<sup>3</sup> (Target: 50 µg/m<sup>3</sup> as a 24-hr mean no more than 35 days/year; not to exceed 40 µg/m<sup>3</sup> as annual mean)</li> <li>➤ ozone levels in µg/m<sup>3</sup> as an 8-hour mean (Target: No more than 100 µg/m<sup>3</sup> as an 8 hour mean more than 10 times a year)</li> <li>➤ number and proportion of new or upgraded waste management developments located within AQMAs or within Air Quality Focus Areas</li> <li>➤ the number and proportion of new or upgraded waste management facilities achieving 'Air Quality Neutral' standards as defined by the Mayor<sup>65</sup></li> </ul> | <p>Section 7,<br/>Page 80</p> |
| <p><b>Objective 11: Environmental protection</b><br/>To minimise the adverse impacts of noise, vibration, dust, light, soil contamination and water pollution during both the construction and operational phases</p> | <ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal help to minimise the potentially adverse impacts of waste management facilities on noise pollution, vibration, odour and dust on nearby sensitive land-uses during both the construction and operational phases of new or upgraded waste management facilities?</i></li> <li>➤ <i>Will the policy or proposal help to minimise water pollution from surface water runoff?</i></li> <li>➤ <i>Will the policy or proposal help to remediate contaminated sites and therefore reduce the potential risks to human health, adjacent land uses and the local environment?</i></li> </ul>   | <ul style="list-style-type: none"> <li>➤ the number and proportion of new or upgraded waste management facilities located adjacent to residential uses and other sensitive land-uses</li> <li>➤ the number and proportion of new or upgraded waste management facilities which are enclosed or screened</li> <li>➤ the number of new or upgraded waste management facilities accompanied by Construction Environmental Management Plans</li> <li>➤ the number of new or upgraded waste management facilities incorporating the principles of 'water sensitive urban design' as part of the site drainage/SuDS strategy</li> <li>➤ the number and area of contaminated industrial sites remediated as a consequence of the development of new or upgraded waste management facilities (ha)</li> </ul>   | <p>Section 7,<br/>Page 80</p> |

<sup>64</sup> PM10s = particulate matter less than 10 microns in size

<sup>65</sup> 'air quality neutral' standards are defined in the Mayor's supplementary planning guidance (SPG) on Sustainable design and Construction (GLA, 2014)

| SA Objective  | Appraisal Questions  | Indicators  | Issue Ref                     |
|---|--|---|-------------------------------|
| <p><b>Objective 12: Biodiversity and Habitats</b></p> <p>To protect and enhance biodiversity, habitats and green corridors within the plan area and avoid potentially significant impacts upon nearby 'European sites' covered by the EU Habitats Directive</p> | <ul style="list-style-type: none"> <li>➤ <i>Is the policy or proposal likely to have a 'significant' effect upon the protection or integrity of a 'European site' as defined in the EU Habitats Directive and the UK Habitats Regulations 2010 - including any Special Areas of Conservation (SACs) or Special Protection Areas (SPAs)?</i></li> <li>➤ <i>Will the policy or proposal help to minimise any potential impacts upon regionally or locally designated wildlife sites within the plan area?</i></li> <li>➤ <i>Will the policy or proposal ensure that there is no net loss in biodiversity value and incorporate opportunities to enhance biodiversity wherever possible as part of the development of new or upgraded waste management facilities?</i></li> </ul> | <ul style="list-style-type: none"> <li>➤ modelled increase in air pollution arising from the operation of new and existing waste management facilities in south London, associated transport movements and potential adverse impacts on sensitive habitats or species on relevant European sites<sup>66</sup>: <ul style="list-style-type: none"> <li>- Richmond Park SAC;</li> <li>- Wimbledon Common SAC;</li> <li>- Mole Gap to Reigate Escarpment SAC; and</li> <li>- Ockham and Wisley Commons SSSI (part of Thames Basin Heaths SPA).</li> </ul> </li> <li>➤ the number of new or upgraded waste management facilities located within or adjacent to regionally or locally designated wildlife sites, including Sites of Interest for Nature Conservation (SINCs), local nature reserves (LNRs); and green corridors</li> <li>➤ change in biodiversity value arising from the development of new or upgraded waste management facilities based on an appropriate metric such as the DEFRA biodiversity offsetting metric<sup>67</sup></li> <li>➤ change in priority habitats and population of Biodiversity Action Plan (BAP) species within each of the four boroughs</li> </ul> | <p>Section 7,<br/>Page 81</p> |

<sup>66</sup> the potential significance of any likely adverse effects on European sites arising from the new South London Waste Plan (SLWP) will be considered in the Habitats Regulations Assessment (HRA) Screening Report which will be produced for public consultation at the issues and options stage in October 2019

<sup>67</sup> further details of DEFRA's biodiversity offsetting metric is available on the GOV.UK website at <https://www.gov.uk/government/collections/biodiversity-offsetting>

| SA Objective  | Appraisal Questions   | Indicators  | Issue Ref          |
|---|---|---|--------------------|
| <b>(D) ENVIRONMENTAL QUALITY</b>  |   |   |                    |
| <p><b>Objective 13: Local Economy and Employment</b><br/>To promote local employment opportunities, and the competitiveness of the waste management sector within South London</p>  | <ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal promote investment, local employment opportunities and the competitiveness of the waste management sector?</i></li> <li>➤ <i>Will the policy or proposal contribute to the growth of the circular economy within south London?</i></li> <li>➤ <i>Will the policy or proposal help to ensure that employment land supply matches projected demand over the plan period in each of the four partner boroughs and for the plan area as a whole?</i></li> <li>➤ <i>Will the policy or proposal help to maintain a sufficient supply of land and premises to meet current and future demands for industrial uses within the four south London boroughs and across the wider Wandale Valley Property Market Area <sup>68</sup></i></li> <li>➤ <i>Will the policy or proposal help to that sufficient volumes of recyclable materials are generated to make domestic manufacturing from waste viable?</i></li> </ul> | <ul style="list-style-type: none"> <li>➤ number of people employed in the Circular Economy within south London and by borough</li> <li>➤ number of green businesses by size and proportion surviving 1 year</li> <li>➤ growth in the low carbon and environmental goods and services sector within south London</li> <li>➤ projected supply and demand for employment land (for non waste-related uses) by borough over the plan period<sup>69</sup></li> <li>➤ vacancy rates within SILs and established industrial areas</li> <li>➤ number of sites and total area of employment land within SILs and established industrial areas intensified for waste management and/or for other industrial uses</li> <li>➤ area of employment land optimised for waste management and complementary manufacturing from waste uses</li> <li>➤ tonnage and proportion of waste prepared for re-use, recycled or recovered by waste stream (tpa) (%)</li> <li>➤ number and capacity of manufacturing from waste facilities developed within south London (tpa)</li> </ul> | Section 7, Page 81 |
| <p><b>Objective 14: Townscape and Visual Amenity</b><br/>To minimise the potentially adverse impacts of waste management facilities on townscape quality and visual amenity by promoting high standards of design and layout.</p> | <ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal ensure that new or upgraded waste management facilities are built to high quality design principles that respect local character and do not adversely affect townscape?</i></li> <li>➤ <i>Will the policy or proposal minimise potential adverse impacts on the quality and distinctiveness of south London's historic environment and cultural assets,</i></li> </ul>  | <ul style="list-style-type: none"> <li>➤ the number and proportion of new or upgraded waste management facilities constructed to high quality design principles</li> <li>➤ adverse impacts on the setting of scheduled monuments, historic parks and gardens and other heritage or cultural assets in south London</li> </ul>   | Section 7, Page 82 |

<sup>68</sup> the Wandale Valley Property Market Area defined in the draft new London Plan includes Wandsworth as well as Croydon, Kingston,, Merton and Sutton

<sup>69</sup> based on the London Industrial Land Demand Study, prepared by CAG Consultants on behalf of the Mayor in 2017), Table 6.2 of the draft New London Plan categorises Croydon, Kingston and Merton as needing to 'retain capacity' for employment land, whereas Sutton is categorised as needing to 'provide capacity'



| SA Objective   | Appraisal Questions  | Indicators   | Issue Ref          |
|--|--|--|--------------------|
| <p><b>Objective 15: Human Health and Quality of Life</b><br/>To minimise the potentially adverse impacts of waste management facilities on human health and protect the open environment</p> | <ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal protect and enhance local amenity and quality of life for residents living near new and existing waste management facilities, particularly within areas affected by social deprivation?</i></li> <li>➤ <i>Will the policy or proposal help to minimise the potentially adverse impacts of waste management facilities and associated transport movements, on public health?</i></li> <li>➤ <i>Will the policy or proposal help to reduce the incidence of waste-related crime and contribute to public perceptions of safety?</i></li> <li>➤ <i>Will the policy or proposal maintain the current level of protection for Green Belt and Metropolitan Open Land (MOL) and public open space</i></li> </ul>  | <ul style="list-style-type: none"> <li>➤ levels of social deprivation in residential areas adjacent to waste management sites and the strategic road network within south London as measures by the Government's Index of Multiple Deprivation (IMD) and the relevant domains relating to employment, health, crime and living environment</li> <li>➤ monitored levels of nitrogen dioxide (NO<sub>2</sub>), particulates (PM10) and ozone against national air quality objectives (see above)</li> <li>➤ levels of 'health and disability' deprivation in residential areas adjacent to waste management sites (see above)</li> <li>➤ environmental crime rate per 1,000 population</li> <li>➤ area of Green Belt, MOL and public open space and area lost to waste management development</li> </ul> | Section 7, Page 83 |
| <p><b>Objective 16: Equalities, Accessibility and Social Inclusion</b><br/>To reduce exclusion, address inequalities &amp; improve</p>   | <ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal ensure that new waste management facilities are accessible and inclusive for all equalities target groups?</i></li> <li>➤ <i>Will the policy or proposal further promote social inclusion by addressing potential inequalities arising from current waste management arrangements in south London?</i></li> <li>➤ <i>Will the plan preparation process increase the overall extent of ongoing public involvement in the waste planning process in south London?</i></li> <li>➤ <i>Will the policy or proposal maximize potential benefits to local communities</i> in the form of new products, employment and low carbon energy by managing more waste locally, optimising existing waste facilities and building new reuse and recovery facilities?</li> </ul> | <ul style="list-style-type: none"> <li>➤ new or upgraded waste management facilities within south London are accessible and inclusive for all equalities target groups</li> <li>➤ number and location of reuse and recycling centres within south London accepting household waste</li> <li>➤ proportion of the urban area within south London within 2 km of reuse and recycling centres</li> <li>➤ location and concentration of existing and new waste facilities within South London relative to areas of relative social deprivation</li> <li>➤ number of individuals, residents' groups, special interest groups, business organisations, public bodies and neighbouring waste planning authorities consulted as part of the preparation of the new plan</li> </ul>                              | Section 7, Page 83 |



---

## 9 CONSULTING ON THE SCOPE OF THE SUSTAINABILITY APPRAISAL (TASK A4) AND NEXT STEPS

---

### Consultation arrangements

**9.1** In order to meet the requirements of the SEA Directive and procedures for community engagement on DPD and SA documents set out in the individual Statements of Community Involvement (SCI) published by each of the partner Boroughs, this SA Scoping Report is being published over a 5-week period from Monday 16 September to Monday 21 October 2019 in order to seek the views of the following statutory consultees on the proposed scope of the appraisal:

**Historic England,**  
London Office,  
4th Floor,  
Cannon Bridge House,  
25 Dowgate Hill,  
London EC4R 2YA

**Natural England,**  
Consultation service,  
Hornbeam House,  
Electra Way,  
Crewe Business Park,  
Crewe ,  
Cheshire CW1 6GJ

**Environment Agency,**  
PO Box 544,  
Rotherham,  
Yorkshire  
S60 1BY

**9.2** Copies of the SA Scoping Report will be made available at [www.sutton.gov.uk/wasteplan](http://www.sutton.gov.uk/wasteplan).

**9.3** Hard copies of the SA Scoping Report can be requested from:

**Write:** Duncan Clarke, South London Waste Plan Project Manager, London Borough of Sutton, Strategic Planning, 24 Denmark Road, Carshalton SM5 2JG

**Telephone:** 020 8770 6453

**Email:** [planningpolicy@sutton.gov.uk](mailto:planningpolicy@sutton.gov.uk)

**9.4** Feedback from the consultation exercise will inform the range of sustainability objectives, targets and indicators to be used as the basis for undertaking SA and Equalities Impact Assessment (EqIA) on the 'Issues and Options' consultation document , which will be published for public consultation in October 2019. The resulting SA Report together with an EqIA and Habitats Regulations Assessment (HRA) screening report will be published alongside the Issues and Options document.

### Next Steps

**9.5** The process of developing the new South London Waste Plan will take approximately another two and a half years. During this time, it will go through a series of stages leading up to producing a final plan by 2021 as shown in Table 9.1.

**9.6** The next stage will involve public consultation on the SLWP Issues and Preferred Options document between **Thursday 31 October and Sunday 22 December 2019**. This consultation exercise will seek views from statutory bodies and the public on the broad issues and possible options identified for the plan and raise awareness of waste planning and inform the public of the Plan's preparation process. The SA Report to be published in support of the Issues and Preferred Options document will explore the implications of the issues and possible options on each of the sustainability objectives targets and indicators identified in the proposed SA Framework (see Section 8).

**Table 9.1: Stages of plan preparation**

| Plan-making stage  | Timescale                |
|--|--------------------------|
| Evidence gathering   | October 2018 onwards     |
| Consultation with relevant bodies on SA Scoping Report (this document) | 16 September-21 Oct 2019 |
| Public consultation on SLWP Issues and Preferred Options               | 31 October-22 Dec 2019   |
| Public consultation on the proposed Submission Draft                   | May 2020                 |
| Submission of the new SLWP to Secretary of State                       | August 2020              |
| Examination in Public  | January 2021             |
| Inspector's Report   | March 2021               |
| Adoption   | July 2021                |

**9.7** Detailed consultation arrangements will be guided by the requirements of The Town and Country Planning (Local Development) (England) Regulations 2004 and the respective Statements of Community Involvement (SCI)<sup>70</sup> adopted by each of the four Boroughs. For the SLWP, a programme of public consultation and stakeholder engagement has been developed, which meets these requirements.

**9.8** In considering this SA Scoping Report, consultees are asked to address the following questions:

- **Is the proposed appraisal methodology set out in Section 3 sound and consistent with meeting the requirements of both SA and the SEA Directive?**
- **Have any relevant plans, programmes and sustainability objectives been omitted from Section 4 and the scoping table presented in Appendix 2?**
- **Does the baseline information in Section 6 provide a complete picture of the environmental, economic, social and equalities factors that need to be considered?**
- **Do the key sustainability issues outlined in Section 7 reflect all the significant social, economic and environmental factors relevant to the South London area?**
- **Does the proposed SA Framework set out in Section 8 identify an appropriate range of sustainability objectives, indicators and targets for the purpose of appraising and monitoring the significant effects of the plan and alternative options?**

<sup>70</sup> the SCI sets out each Council's minimum requirements for involving the community in the preparation and revision of all local development documents, including DPDs

## GLOSSARY

### **Agricultural Waste**

Waste from a farm or market garden, consisting of matter such as manure, slurry and crop residues

### **Anaerobic Digestion**

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

### **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, Commercial waste and Industrial waste. This term is used in waste data sources. These waste streams are also known as Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste. The term HCI is used to describe the throughput where a facility manages both waste streams

**Household Waste**

Refuse from household collection rounds, waste from street sweepings, public litter bins, bulky items collected from households and wastes which householders themselves take to household waste recovery centres and "bring sites"

**Industrial Waste**

Waste from a factory or industrial process

**Inert waste**

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

**Inert Landfill**

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

**In-Vessel Composting**

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

**ILW - Intermediate level radioactive waste**

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

**Local Authority Collected Waste (LACW)**

Household waste and any other waste collected by a waste collection authority such as municipal parks and gardens waste, beach cleansing waste and waste resulting from the clearance of fly-tipped materials

**Landfill**

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

**Landfill Directive**

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

**LLW – low level radioactive waste**

Lightly contaminated miscellaneous scrap, including metals, soil, building rubble, paper towels, clothing and laboratory equipment

**Materials Recycling Facility (MRF)**

A facility for sorting and packing recyclable waste

**Mechanical Biological Treatment (MBT)**

Treatment of residual waste using a combination of mechanical separation and biological treatment

**Non- Hazardous Landfill**

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

**Non- Inert**

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

**Organic Waste**

Biodegradable waste from gardening and landscaping activities, as well as food preparation and catering activities. This can be composed of garden or park waste, such as grass or flower cuttings and hedge trimmings, as well as domestic and commercial food waste

**Open Windrow Composting**

A managed biological process in which biodegradable waste (such as green waste and kitchen waste) is broken down in an open-air environment (aerobic conditions) by naturally occurring micro-organisms to produce a stabilised residue

**Proximity Principle**

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)**

End-of-life electrical or electronic equipment for the depollution, disassembly, shredding, recovery or preparation for disposal of this waste must meet the EU's WEEE Directive.

### **Waste Hierarchy**

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

### **Waste Local Plan**

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

### **Waste 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. Although, in practice, usually some recycling and management takes place as part of the sorting or baling.



# Appendix 2

## PROPOSED EQUALITIES IMPACT ASSESSMENT (EqIA) CRITERIA

### 1. Introduction

1.1 It is intended to undertake Equalities Impact Assessment (EqIA) as part of the preparation of the new South London Waste Plan (SLWP) in order to assess the potential implications of the plan on each of the equality target groups within the four partner boroughs. As part of this process, the first EqIA report on SLWP Issues and preferred Options will be published for public consultation alongside the Sustainability Appraisal (SA) Report on the draft plan between 31 October and 22 December 2019.

### 2. What is an EqIA?

2.1 An EqIA is defined by the Equality and Human Rights Commission<sup>71</sup> as “a tool that helps public authorities make sure their policies, and the ways they carry out their functions, do what they are intended to do for everybody”. EqIAs help local authorities to identify potential sources of discrimination against specific equalities groups arising from their policies or operations and take appropriate steps to address them. This can also highlight opportunities to promote equalities and make a positive contribution to improving quality of life for local communities. An EqIA should not be an afterthought and should inform policy preparation from the earliest stages of plan making..

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

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

### 3. Legislation

3.1 The requirement to consider the impacts of policies and strategies upon certain equality target groups through EqIA process arises from the following legislation:

#### Race Relations (Amendment) Act 2000

3.2 This amendment required local authorities to be pro-active in promoting racial equality by undertaking a Race Equality Impact Assessment of their strategies and plans.

---

<sup>71</sup> see <http://www.equalityhumanrights.com>

### Disability Discrimination (Amendment) Act 2005

**3.3** The Act required local authorities to promote equality of opportunity for disabled people by ensuring that their policies, practices, procedures and services do not discriminate against them.

### Equality Act 2006

**3.4** The Act established the Commission for Equality and Human Rights (CEHR) which came into force in October 2007. It brought together as one organisation the CRE, Disability Rights Commission (DRC) and Equal Opportunities Commission (EOC).

### Gender Equality Duty 2007 (as required by the Equality Act 2006)

**3.4** This came into effect in April 2007 and is aimed at public authorities to eliminate unlawful discrimination and harassment and promote gender equality. There is a requirement to produce and publish a gender equality scheme. As part of this, the authorities must assess the impact of their existing and future policies and practices on gender equality as well as consult stakeholders with a scheme review every 3 years.

### Equality Act 2010

**3.5** The Equality Act 2010 brought together over 116 separate pieces of legislation into one single Act. Combined, they make up a new Act that provides a legal framework to protect the rights of individuals and advance equality of opportunity for all. The Act simplifies, strengthens and harmonises the previously existing legislation in order to protect individuals from unfair treatment and promotes a fair and more equal society. The main pieces of legislation that have merged are:

- Sex Discrimination Act 1975;
- Race Relations Act 1976;
- Disability Discrimination Act 1995;
- Employment Equality (Religion or Belief) Regulations 2003;
- Employment Equality (Age) Regulations 2006;
- Equality Act 2006, Part 2; and
- Equality Act (Sexual Orientation) Regulations 2007.

**3.6** Section 149 of the Act introduces a 'general duty' on all public sector bodies to have regard to the following considerations in the exercise of their functions:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

**3.7** In seeking to tackle prejudice, promote understanding and advance equality of opportunity for persons who share a relevant 'protected characteristic', public bodies should have regard to:

- removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- encouraging persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

**3.8** The relevant protected characteristics are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

## 4. Equalities target groups and proposed EqIA criteria

4.1 Table 4.1 identifies the range of equality target groups to be considered as part of the EqIA of the new SLWP<sup>72</sup>.

**Table 4.1: Equality Target Groups**

| Equality Target Group                       | Equality Target Strand |
|---|------------------------|
| Women                                       | Gender                 |
| Black and minority ethnic (BME) people      | Race                   |
| Older people                                | Age                    |
| Young people and children                   | Age                    |
| Disabled people                             | Disability             |
| Lesbians, gays, bisexuals and transgendered | Sexuality              |
| Different faith groups                      | Faith                  |
| People affected by social deprivation       | Social Deprivation     |

## 5. Proposed EqIA criteria

5.1 Table 5.1 identifies proposed EqIA criteria as the basis for assessing the potential impacts of emerging SLWP policies and proposals upon each equality target group compared to reasonable alternatives.

**Table 5.1: Proposed EqIA criteria**

| EqIA Criterion  |
|---|
| Will the policy or proposal have beneficial or adverse impacts for women?   |
| Will the policy or proposal have beneficial or adverse impacts for black and minority ethnic (BAME) groups or faith groups?             |
| Will the policy or proposal have beneficial or adverse impacts for older people?  |
| Will the policy or proposal have beneficial or adverse impacts for young people and children?   |
| Will the policy or proposal have beneficial or adverse impacts for disabled people and people with a limiting long-term illness?        |
| Will the policy or proposal have beneficial or adverse impacts for lesbians, gays, bisexuals and/or transgendered people (LGTB groups)? |
| Will the policy or proposal have beneficial or adverse impacts for people affected by social deprivation?                               |
| Will the policy or proposal have beneficial or adverse impacts for gypsies and/or travellers?   |

<sup>72</sup> 'Equality Impact Assessments, How to do Them' (GLA, November 2003)





