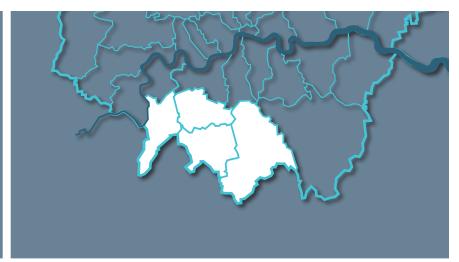
- L B Croydon
 - L B Merton
 - L B Sutton



South London Waste Plan







Sustainability Appraisal (SA)
Addendum Report on Proposed Modifications

incorporating Strategic Environmental Assessment (SEA)

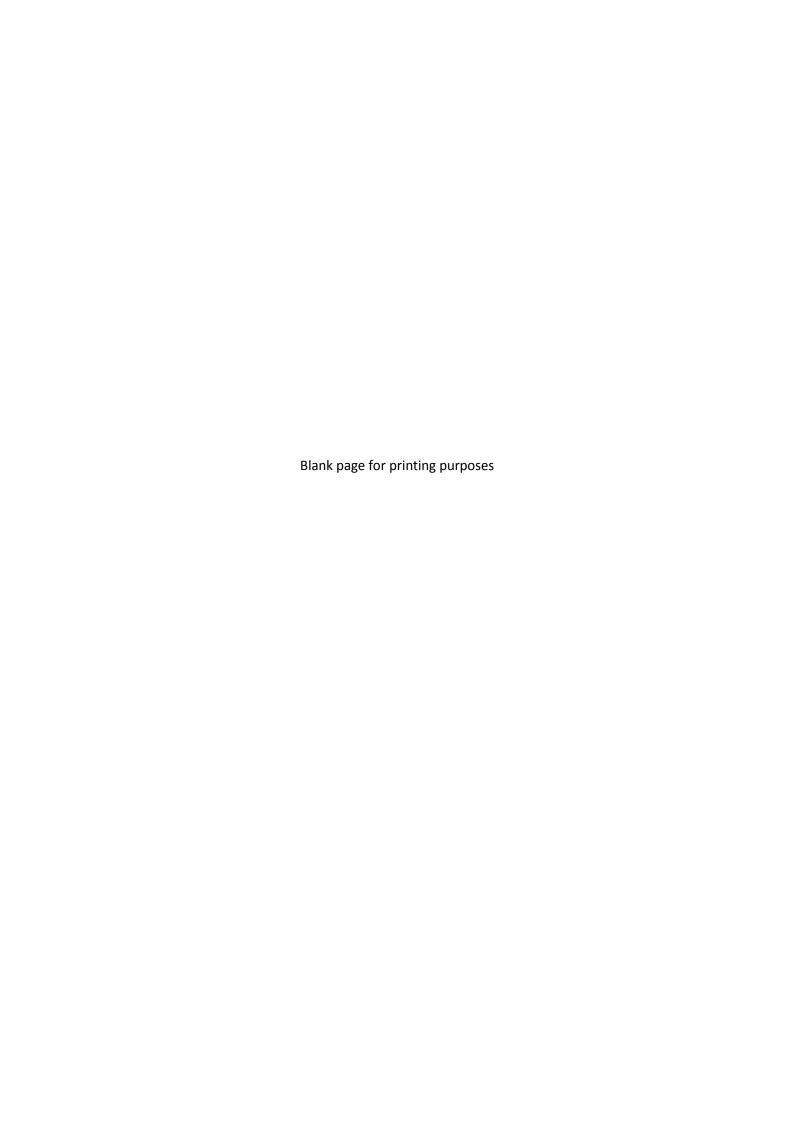
May 2022











	Contents	Page
ONE	Introduction	5
	Purpose of the new South London Waste Plan	5
	Stages in the preparation of the draft plan	5
	National planning policy requirements	6
	Figure 1.1: The Waste Hierarchy	7
	London Plan Apportionment targets	7
	Table 1.1: Apportionment targets for South London in the New London Plan	7
	Requirement for Sustainability Appraisal	8
	SA Scoping Report	9
	SA Report on SLWP Issues and Preferred Options (Regulation 18)	9
	SA Report on Draft SLWP Proposed Submission (Regulation 19)	9
	The SA Addendum Report on Proposed Modifications	11
	Final SA Addendum Report on Main Modifications	12
	Equalities Impact Assessment (EqIA)	12
TWO	Final Appraisal of Main Modifications (Tasks B3, B4 and B5)	13
	Appraisal Methodology	13
	Table 12.1: Guide to the Symbols Used in the Appraisal Matrix	13
	SUSTAINABILITY APPRAISAL MATRIX	15-68
THREE	Conclusions	69-72

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 2022-37. When it is adopted in 2022-23, the new plan will replace the previous SLWP 2011-21¹ introduced in 2012. The purpose of the new SLWP is to plan for the essential waste management infrastructure to support future population and household growth in South London by:
- safeguarding existing waste management sites;
- identifying sites and broad locations suitable for new waste facilities if needed;
- providing sufficient sites across the four partner borough to deliver the combined apportionment targets set out in the New London Plan 2021 up to 2036, including the aim of achieving net self-sufficiency by 2026; and
- setting out planning policies to ensure that new or redeveloped waste facilities within South London drive waste management further up the Government's waste management hierarchy, promote the circular economy and minimise any adverse impacts upon on nearby land uses and the local environment.
- 1.2 A new plan is needed from 2022 onwards because, in the absence of waste policies, all four local planning authorities would otherwise be unable to refuse inappropriate applications for waste treatment. Neither the adopted Local Plans for Sutton or Croydon include waste policies nor do the emerging Local Plans for Kingston and Merton. With a number of waste operators transferring between sites in Sutton, Croydon and Merton over the past ten years, the four partner boroughs consider that collaberative working at the sub-regional level is essential for effective waste planning.

Stages in the preparation of the draft plan

- 1.3 Following initial public consultation on Issues and Preferred Options and an accompanying sustainability appraisal (SA) between 31 October and 22 December 2019 (Regulation 18 consultation²), a draft version of the SLWP 2021-36 (Proposed Submission) was published for further consultation together with an accompanying SA Report³ between 4 September and 22 October 2020 (Regulation 19 consultation⁴). The draft plan, which incorporated a number of changes made in the light of representations received and changing circumstances, proposes to safeguard 46 existing sites for waste uses and identifies ten development management policies to guide planning applications for new or intensified waste facities within the four boroughs over the next 15 years.
- 1.4 On 19 January 2021, the draft SLWP was submitted to the Secretary of State for Housing, Communities and Local Government for Examination-in-Public (EiP) in line with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The draft plan was accompanied by a number of submission documents, including the SA Report; a Schedule of Main Modifications arising from Regulation 19 consultation; the Sequential Test (flood risk); the Duty to Cooperate Statement; Statement of Consultation, Technical Papers and site appraisals.

 4 under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

South London Waste Plan: Final SA Addendum Report on Main Modifications (March 2022)

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

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

³ the SA Report on the draft SLWP (Proposed Submission) included an Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment screening report. A Sequential Test (flood risk) on the draft SLWP was prepared as a separate consultation document.

- **1.5** Subsequently, in July 2021, five 'matters statements' were prepared as part of a further submission to the EiP together with a schedule of further proposed changes to the plan in order to address each of the matters, issues and questions (MIQs) previously identified by the Inspector. The matters statements covered the following topics:
- Matter 1: Is the Plan legally compliant, have the relevant procedural requirements been met, and has the Duty to Co-operate (DtC) been discharged?
- Matter 2: Is the Plan in general conformity with the London Plan?
- Matter 3: Does the Plan make adequate provision for the waste management apportionments required by the London Plan and any other arisings, and is it positively prepared in this regard?
- Matter 4: Does the Plan set out an effective suite of policies for the management of waste in the area; and are they justified and consistent with national policy?
- Matter 5: Does the Plan set out effective mechanisms for its implementation and monitoring?
- **1.6** An SA Addendum Report on Proposed Modifications⁵ was prepared in July 2021 in order to assesses the impacts of each of the proposed modifications to the SLWP (consisting of the Main Modifications submitted to the Inspector in January 2021 and the further proposed changes arising from the Inspector's MIQs as set out in each of the above matters statements). The SA Addendum Report formed part of the above submission to the EiP.
- 1.7 Following the EiP Hearing into the draft SLWP, which was held at the Merton Council Chamber between 1-2 September 2021, the Inspectors prepared closing remarks on the outcome of the hearings (2 September 2021) and subsequently a post-hearing letter on 7 September 2021⁶ which set out the next steps for preparing and consulting upon the final schedule of Main Modifications.
- 1.8 Arising from the outcome of the EiP hearing and the Inspectors' recommendations on further changes that may be needed to resolve outstanding issues, the four boroughs have prepared a final consolidated schedule of Main Modifications to the draft SLWP for public consultation. This shows all material changes made to the draft SLWP compared to the Regulation 19 submission version and supersedes the previous schedules of Main Modifications prepared in March and July 2021 respectively (Examination Doc SLWP02a and SLWP02b). This SA Addendum Report assesses the likely impact of each of the Main Modifications on the sustainability criteria making up the four Boroughs' SA Framework.

National planning policy requirements

- **1.9** The National Planning Policy for Waste⁷ (NPPW) (DCLG, 2015) requires local planning authorities to prepare local plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams by:
- undertaking early and meaningful engagement with local communities so that plans, as far as
 possible, reflect a collective vision and set of agreed priorities when planning for sustainable
 waste management, recognising that proposals for waste management facilities such as
 incinerators can be controversial;
- driving waste management up the Government's waste hierarchy (see Figure 1.2), recognising
 the need for a mix of types and scale of facilities, and that adequate provision must be made
 for waste disposal;

South London Waste Plan: Final SA Addendum Report on Main Modifications (February 2022)

⁵ the SA Addendum Repport (Ref: SLWP06) can be viewed at https://drive.google.com/file/d/1L08_94PDI AaZZ22IU kwAlXymjZCsbr/view

⁶ the Inspectors' Post-Hearing Letter can be viewed at https://drive.google.com/file/d/1q8USKHZTGYh4hz6XqdGLDQpQ4kphffKkl/view

⁷ the NPPW is available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment data/file/364759/141015
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment data/file/364759/141015
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment data/file/364759/141015

- 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 1.1: The Waste Hierarchy

London Plan Apportionment targets

- **1.10** The New London Plan⁸, adopted on 2 March 2021, includes the following targets for waste which reflect those set out in the Mayor's Environment Strategy (GLA, 2018):
- the equivalent of 100% of London's waste managed within London (i.e. net self-sufficiency) by 2026 for all waste streams except excavation waste;
- zero biodegradable or recyclable waste to landfill by 2026;
- at least 65% recycling of municipal waste by 2030;
- 95% reuse/recycling/recovery of construction and demolition waste; and
- 95% beneficial use of excavation waste.

1.11 New apportionment targets are set for each borough under Policy SI 8 on 'Waste capacity and net waste self-sufficiency' 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.

⁸ the London Plan 2021 is available at https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan/london-plan/

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

Table 1.1: Apportionment targets for South London in the New London Plan 2021

Requirement for Sustainability Appraisal

- 1.12 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.
- **1.13** SA is integral to the preparation and development of all DPDs, including local waste plans. Its purpose is to promote the aims of sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The relationship between the SA and plan preparation processes is shown in Figure 1.3.
- 1.14 SA reports on the significant impacts of plan implementation and alternatives (including the 'business as usual' and 'do-nothing' options) on the environmental, economic and social objectives of sustainable development. By identifying key issues, developing policies and proposals and assessing their likely effects from the earliest stages of plan preparation, SA is an important tool for developing more effective and sustainable plans which are evidence-based. In the context of waste planning, the appraisal process can help planners and the public gain a better understanding of how well-designed waste facilities in the right locations can deliver long-term benefits for local environmental quality, promoting the circular economy and community well-being.
- 1.15 To be effective, SA must be
- **Inclusive:** ensuring early and on-going involvement of the public, statutory bodies and other relevant stakeholders at the appropriate stages of plan preparation;
- Objectives-led: the direction of desired change has measurable targets;
- **Evidence-based:** including relevant baseline information against which the potential effects of the plan and policy options can be measured and assessed;
- **Useful:** providing clear conclusions and recommendations on how the plan can be made more sustainable and proposals for future monitoring.
- **1.16** The SA process also provides the means of identifying and mitigating any potential adverse effects that the plan might otherwise have.
- **1.17** At the conclusion of the plan-making process, the SA Report on the Draft SLWP Regulation 19 Submission version together with the SA Addendum Report on Main Modifications (this report), should describe how the adopted plan has addressed the sustainability agenda and the choices that

have been made between alternative policies and proposals. This will be considered by the Inspector alongside a range of other evidence base documents when determining the soundness of the plan.

SA Scoping Report

- **1.18** In order to meet the requirements of the SEA Directive and procedures for community engagement on local plan and SA documents set out in the statutory regulations and respective Statements of Community Involvement (SCI), an initial SA Scoping Report for the new SLWP was published over a five week period from **16 September until 21 October 2019** in order to seek the views of relevant bodies, namely the Environment Agency (EA), Natural England and Historic England, on the proposed scope of the appraisal.
- 1.19 Its purpose was to define the scope of the appraisal and provide the basis for appraising the potential effects of alternative waste management policies against a comprehensive range of environmental, social and economic criteria. The sustainability objectives, indicators and targets making up the proposed SA Framework were shaped by the aims of national planning policy, the Mayor's Environmental Strategy, the draft London Plan and local planning policies within each of the four boroughs.
- 1.20 Responses to consultation on the SA Scoping Report were received from the Environment Agency (28 October 2019); Historic England (21 October 2019); and Natural England (17 October 2019). and the comments received have been incorporated within this SA Report. All representations received on the SA Scoping Report (and on the subsequent SA Report on SLWP Issues and Preferred Options) and how they have been addressed are set out in Appendix 3.

SA Report on SLWP Issues and Preferred Options – Reg 18

- 1.21 Following extensive evidence gathering work, culminating in the production of a Technical Paper⁹ by Anthesis consultants on behalf of the four boroughs in June 2019, and publication of the SA Scoping Report (see above), an SLWP Issues and Preferred Options document was published for public consultation between 31 October and 22 December 2019 (Regulation 18 consultation). Importantly, the Issues and Preferred Options document identified that the four boroughs could meet the combined target for household and C&I waste by only safeguarding existing sites, but would permit appropriate intensification of waste treatment on these sites, and proposed to meet the shortfall in meeting the C&D waste target by allowing the intensification of waste treatment for this waste stream on existing sites. The principal headline from the document was to propose no new waste sites, although a replacement site for an existing site would be considered.
- **1.22** The Issues and Preferred Options document was accompanied by a further SA Report (incorporating SEA, EqIA and Habitats Regulations screening)¹⁰. Its purpose was to assess the likely effects of the 'preferred option' (consisting of the Vision, eight draft policies and 46 existing waste sites proposed to be safeguarded) and strategic alternatives against each of the environmental, social and economic objectives making up the SA Framework.
- 1.23 The SA Report concluded that draft Policies WP1-WP8, which were developed by the four partner boroughs as the 'preferred' strategy for the new SLWP (Option 1), would have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012

South London Waste Plan: Final SA Addendum Report on Main Modifications (March 2022)

⁹ the South London Waste Technical Paper and accompanying Appendices are available at <u>www.sutton.gov.uk/currentconsultations</u>

¹⁰ the SA Report on SLWP Isues and preferred Options is available at <u>www.sutton.gov.uk/currentconsultations</u>

(Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 were shown to be overwhelmingly negative.

1.24 A total of 1,155 formal responses were received from 57 respondents on the SLWP Issues and Preferred Options Document and the SA Report. Representations received to the SA Report are set out in Appendix 3 of the subsequent SA Report on the Draft SLWP (Proposed Submission) (see below).

SA Report on Draft SLWP (Proposed Submission) - Reg 19

- **1.25** A draft version of the SLWP 2021-36 (Proposed Submission) was published for further consultation together with an accompanying SA Report¹¹ and Sequential Test (flood risk) between 4 September and 22 October 2020 (Regulation 19 consultation¹²). The draft plan, which incorporated a number of changes made in the light of representations received and changing circumstances, proposes to safeguard 46 existing sites for waste uses and identifies ten development management policies to guide planning applications for new or intensified waste facities within the four boroughs over the next 15 years.
- 1.26 The accompanying SA Report demonstrates that the ten Policies WP1-WP10 proposed for inclusion in the new SLWP 2021-36 (Option 1), are likely to have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012 (Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 are shown to be overwhelmingly negative.
- 1.27 While Option 1 essentially carries forward the same overall strategic approach which was identified and assessed as the 'preferred option' in the previous SA Report on Issues and Preferred Options, the SA Matrix demonstrates that the two newly introduced policies (WP8 'Strategic Approach to Other Forms of Waste' and WP10 'Monitoring and Contingencies') and the changes made to Policies WP2 'Strategic Approach to Other Forms of Waste' and WP6 'Sustainable Design and Construction of Waste Facilities' will significantly improve the plan by making a greater contribution to sustainability objectives. Amongst other things, this outcome reflects the move from a shortfall in C&D waste to a small surplus against forecast arisings in 2036.
- **1.28** Overall, the most important sustainability benefits of the draft SLWP Submission Version include:
- achieving **net self-sufficiency** within South London by providing sufficient sites and waste management facilities to both meet (but not exceed) the new apportionment targets for household and C&I waste and to manage future C&D waste arisings over the plan period to 2036; eliminating the need to identify additional waste sites and by developing more efficient, effective and cleaner management practices in partnership with the waste industry;.
- promoting an environmentally sustainable strategic approach to managing South London's waste arisings by optimising and intensifying the capacity of existing waste management sites; avoiding the uptake of additional employment land for waste management operations where

¹² under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

¹¹ the SA Report on the draft SLWP (Proposed Submission) included an Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment screening report. A Sequential Test (flood risk) on the draft SLWP was prepared as a separate consultation document.

- appropriate; and minimising HGV movements and other potentially adverse environmental impacts associated with waste management activities by promoting complementary uses such as manufacturing from waste;
- promoting sustainable transport objectives by eliminating the need to identify additional waste management sites or 'broad locations' in South London (thus reducing adverse impacts on the strategic/ local road network arising from HGV movements); and by intensifying of existing waste management uses on suitable sites or co-locating complementary uses in industrial areas;
- minimising air pollution and potential impacts on sensitive land-uses and vulnerable receptors (including equalities target groups) arising from waste facilities by reducing waste-related HGV movements on the strategic/ local road network; developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and avoiding any further deterioration in air quality particularly within 'Air Quality Focus Areas';
- moving waste management practices further up the waste hierarchy by promoting waste reuse, recycling and recovery towards achieving the Mayor's targets of 65% recycling of municipal waste by 2030 and zero biodegradable or recyclable waste landfilled by 2026;
- helping to secure the transition to a **circular economy** within south London and keeping products and materials at their highest use for as long as possible by encouraging the colocation of complementary uses such as secondary material processing facilities and supporting manufacturing from waste; and
- promoting local employment, South London's economy and the competitiveness of the waste sector by safeguarding employment land and floorspace within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste management uses (this is particularly important in Sutton, where the strategic demand for industrial, logistics and related uses is anticipated to be the strongest).
- **1.29** A total of 115 representations were received from 47 respondents on the Draft SLWP (Proposed Submission) and the SA Report. A schedule of Main Modifications to the plan was prepared in order to address consultation comments as necessary and this was submitted to the government together with the draft plan on 19 January 2021.

SA Addendum Report on Proposed Modifications

1.30 An SA Addendum Report on Proposed Modifications was subsequently prepared in July 2021 in order to assess the likely impacts of each of the Proposed Main Modifications to the draft plan on the environmental, social and economic objectives making up the SA Framework developed for the SLWP. The Proposed Modifications subjected to appraisal consisted of the Main Modifications initially submitted to the Inspector alongside the draft plan on 19 January 2021 (see above) together with the Additional Main Modifications which were proposed subsequently in the light of the Inspector's schedule of matters, issues and questions (MIQs)¹³. The SA Addendum Report on Proposed Modifications was submitted to the Inspector for EiP in July 2021.

South London Waste Plan: Final SA Addendum Report on Main Modifications (March 2022)

¹³ the Inspector's Schedule of Matters, Issues and Questions (INSP03) (April 2021) is avaibale at https://drive.google.com/file/d/13PYU- TX59iM4GNfTz8hGgQqj6dmqNDu/view

Final SA Addendum Report on Main Modifications

- 1.31 Arsing from the outcome of the EiP Hearing from 1-2 September 2021 and the Inspectors' recommendations on further changes that may be needed to resolve outstanding SLWP matters and issues, the the four boroughs have prepared a final consolidated schedule of Main Modifications to the draft SLWP for public consultation. This shows all material changes made to the draft SLWP compared to the Regulation 19 submission version and supersedes the previous schedules of Main Modifications prepared in March and July 2021 respectively (Examination Doc SLWP02a and SLWP02b). It also has a new number system. This Final SA Addendum Report on Main Modifications has been prepared for final public consultation in order to assess the likely impact of each of the Main Modifications on the sustainability criteria making up the four Boroughs' SA Framework
- **1.32** This Final SA Addendum Report should be read in conjunction with the previous SA Reports on the Draft SLWP (Proposed Submission) prepared for Regulation 19 consultation in September 2020 and the subsequent SA Repport on Proposed Modifications (July 2021). It is not therefore considered necessary to repeat the following chapters which are contained within the formefr document:

TWO Background to the South London Waste Plan

THREE Current Waste Arisings and Capacity in South London

FOUR Sustainability Appraisal and Strategic Environmental Assessment

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

SIX Baseline (Task A2)

SEVEN Key Sustainability Issues (Task A3)

FIGHT The Sustainability Appraisal Framework (Task A4)

NINE Identifying and Assessing Waste Sites (Task A5)

TEN Developing Proposed SLWP Policies (Task A5)

ELEVEN Compatibility of the Vision and Objectives with the SA Framework

1.33 However, the following chapters have been reviewed and amended in this document in order to take account of each of the finalised main modifications to the draft SLWP and to assess their likely impacts on the social, economic and environmental objectives of sustainable development

TWELVE Appraisal of Main Modifications (Tasks B3, B4 and B5) – see Section 2; THIRTEEN Conclusions – see Section 3.

Equalities Impact Assessment (EqIA)

1.34 An Equalities Impact Assessment (EqIA) has been prepared on the Main Modifications in line with the relevant statutory requirements and this is available as a separate document.

2. Final Appraisal of Main Modifications

Appraisal Methodology

2.1 The SA Matrix in Table 2.1 sets out the results of appraisal for each of the Main Modifications to the draft South London Waste Plan (SLWP) as set out in the consolidated Main Modifications Schedule. All proposed changes to the Draft SLWP Proposed Submission, which was published at the Regulation 19 consultation stage on 4 September 2020, are indicated through <u>underlined</u> or crossed out <u>text</u>. As before, the scoring system used to indicate the nature and magnitude of impacts is set out in Figure 2.1 below.

Figure 2.1:	Scoring	system	for use	in	the	appraisal

Symbol	Scale of effect
+++	Large beneficial impacts
++	Medium beneficial impacts
+	Smaller beneficial impact
-	Neutral or no impact
X	Smaller negative impact
XX	Large negative effect.
2	Uncertain impact or the nature and magnitude of the impact is subject to the
ſ	implementation of other policies in the plan.

- **2.2** It should be noted that many of the Main Modifications to the SLWP are factual in nature and do not involve a material change in policy. These are therefore identified as having 'no significant impacts' for the purpose of the appraisal.
- **2.3** This appraisal addendum must be read in conjunction with the full SA Report on the Draft SLWP (Proposed Submission) incorporating the Equalities Impact Assessment (EqIUA), the HRA Screening Report and the Sequential Test which was published for consultation together with the draft SLWP Proposed Submission on 4 September 2020. This previous SA Report which also formed part of the formal submission to the Inspector on 19 January 2021 evaluated and compared the likely impacts of the following three strategic alternatives which were initially identified for the management of South London's waste over the next 15 years from 2021 to 2036:
- Option 1 Proposed Plan (Meet Apportionment) consists of the proposed Policies (WP1-WP10) and site designations which have been taken forward in the draft SLWP for submission.
- Option 2 Existing Plan (Exceed Apportionment) would carry forward the existing waste policies and site designations in the current SLWP 2012 unchanged.
- **Option 3 'Do-Nothing' scenario** considers the impacts of allowing the policies and designations of the existing plan to expire in 2021 and not be replaced by a new plan.

Option 2 (Existing Plan) was further divided, where relevant, into the following two sub-options, both of which would involve significantly exceeding the new London Plan apportionment and the forecast level of C&D waste arisings over the plan period to 2036.

- Option 2a: Existing Plan (Exceed Apportionment) would carry forward the existing policies and existing site designations in the current SLWP 2012 unchanged; and
- Option 2b: Additional Sites (Exceed Apportionment) would carry forward the existing policies in the SLWP 2012 unchanged while identifying new sites in addition to existing safeguarded sites.

SUSTAINABILITY APPRAISAL MATRIX FOR MAIN MODIFICATIONS TO THE SOUTH LONDON WASTE PLAN

	SA FRAMEWORK OBJECTIVES																
	(A) SUS	STAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	TE CHANGE		(C) ENVIRONM	ENTAL QUAL	.ITY	(D)	(D) COMMUNITY WELL-BEING			
	& waste facilities for al waste stream making up the apportionmen	new & existing waste sites to smake the mos efficient use o tindustrial land	hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy withir south London.	MITIGATION To address the causes of climate change by minimising CO ₂ emissions	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	SuDS To avoid, reduce and manage flood risk to or from waste management		(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land- uses arising from waste facilities	MENTAL PROTECTION To minimise the adverse	(12) BIODIVER- SITY AND HABITATS To protect and enhance biodiversity & habitats	EMPLOYMENT To promote	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	QUALITY OF LIFE To minimise adverse on human health and protect the	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve	
THE SOUTH LONDON WAS	STE PLAN	- WHAT	IT IS														
MODIFICATION 1.1 (Post EiP) Para 1.1 First Sentence – page 1 Amend as follows: "The South London Waste Plan sets out policies and safeguards sites for waste facilities across the boroughs of Croydon, Kingston, Merton and Sutton from 2021 2022 to 2036 2037." NOTES • To ensure consistency with the NPPF requirement for a 15-year plan period from adoption.								No signific	ant impac	ts							
MODIFICATION 1 (Post EIP) After Para 1.3 – page 1 Insert: "Community involvement in local planning matters is an essential part of the planning process. Each of the South London Waste Plan Boroughs has an adopted Statement of Community involvement (SCI), a document which aims to ensure that all sections of the community understand how they are able to contribute to the planning process. When planning applications are submitted to the Boroughs, including applications involving waste uses, community involvement will be sought in accordance with the relevant Boroughs' SCI."						+	+	+	++	++	++	+		++	++	+++	
NOTES • Purpose: To clarify how communities will be involved in future planning applications	 Expected to LARGE I MEDIUN adverse SMALL I and from 	ng the involve have:. BENEFICIAL II I BENEFICIAL impacts arisi BENEFICIAL II n waste deve	MPACTS (+++ IMPACTS (++ ng from the co MPACTS (+) fo lopments (8) f) for (16) helpi) for (9) helpii nstruction and r (6) helping to elping to prom	ing to promote ng to deliver su operation of wo o ensure that a	equalities, accustainable tran vaste facilities Il new or upgra st standards of	cessibility and isport objective aded waste mais sustainable de	social inclusiones with the planagement facilesign and con	n within Soutl an area (10) l cilities are ada	ut and concerns London. Helping to mining pted to the futual ew or upgraded	mise air polluti	ion and poten	tial impacts on	sensitive land	d-uses (11) n	ninimising the	

							SA	FRAMEWOR	RK OBJECTIV	/ES						
	(A) SUS	STAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT				ENVIRONM	ENTAL QUAL	_ITY	(D)	COMMUNIT	Y WELL-BE	ING
	& waste facilities for a waste stream making up th	To optimise and intensify	RECOVERY To drive waste management up the waste hierarchy.	ECONOMY To promote a transition to a circular economy withir	To address the causes of climate change by minimising CO ₂ emissions	ADAPTATION To ensure that all waste management facilities are fully adapted to	SuDS To avoid, reduce and manage flood risk to or from waste management	sustainable design and	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive landuses arising from waste facilities	(11) ENVIRON- MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	SITY AND HABITATS To protect and enhance biodiversity & habitats	EMPLOYMENT To promote employment, & competitive- ness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 2 Para 2.1 Final Sentence – page 3 Amend as follows: "This South London Waste Plan is the replacement document and covers the period 2021 2022 to 2036 2037 and supersedes the 2012 South London Waste Plan. A list of superseded policies is set out in Appendix 5". NOTES Purpose: To ensure the Plan period is a minimum of 15 years from adoption. To make it clear that the 2012 South London Was Plan and its Policies is supersede in full. Inspector's Preliminary Matter INSP01 Previously Mod 1							No signif	icant impa	cts – factı	ual change						
MODIFICATION 3 Para 2.11 First Sentence – page 5 Amend third bullet as follows: 95% of construction, demolition and excavation waste to be recycled by 2020 of excavation material to go to beneficial use and 95% of construction and demolition waste for reuse, recycling or recovery. Beneficial use could include using excavated material within the development, or in habitat creation, flood defences, climate change adaption/mitigation or landfill restoration. NOTES • Purpose: To improve clarity and ensure SLWP wording is consiste with the 2021 London Plan and NPPF • Inspector's Question M3 [iv] 9. • Previously Mod 1.1.							No signif	icant impa	cts – factı	ual change						

	SA FRAMEWORK OBJECTIVES																
((A) SUST	TAINABLE \	WASTE MAN	AGEMENT		(B) CLIMATE CHANGE			(C) ENVIRONMENTAL QUALITY				(D)	(D) COMMUNITY WELL-BEING			
SUFI	FFICIENCY	STRATEGY		ECONOMY	MITIGATION	ADAPTATION	SuDS	(8) SUST. DESIGN To promote the highest	SUSTAINBLE TRANSPORT	To minimise air	ENVIRON- MENTAL		EMPLOYMENT	AND VISUAL		(16) EQUALITIES, 8 SOCIAL INCLUSION	
suffi & wa facili	ficient sites a vaste r ilities for all v		management up the waste hierarchy.	transition to a circular economy within	causes of climate change by minimising	all waste management	reduce and manage flood risk to or from	standards of sustainable design and	trips, traffic congestion and pollution	impacts on sensitive land- uses arising	To minimise	enhance biodiversity &	employment , & competitive-	adverse impacts on	adverse on human	To reduce exclusion, address inequalities	
maki	king up the	efficient use of industrial land			from waste	the impacts of climate change	management			facilities	operation of waste facilities		Sth London	quality and visual amenity	protect the	& improve	

KEY ISSUES

MODIFICATION 4

Para 3.8 First Sentence – page 10 Amend as follows:

"The majority of this was household waste sent to Slough Waste Planning Authority (specifically to Lakeside Energy Recovery Facility) but, in the future, this is due to be managed at Beddington. Similarly, HCI waste sent to the Redhill Landfill site is due to be managed in Beddington, following the planned closure of the landfill in 2027. Table 45 sets out the exports of construction, demolition and excavation waste. The largest proportion (97,000 tonnes) was sent to nine different waste treatment facilities located within Surrey Waste Planning Authority, with no one facility receiving more than 31,000 tonnes. However, the Plan identifies sufficient capacity within the plan area to exceed arisings for construction and demolition waste. The Boroughs will continue to monitor cross-boundary movements of waste through the duty to cooperate."

No significant impacts – factual change

<u>NOTES</u>

- Purpose: To improve clarity on cross-boundary movements of waste and ongoing duty-tocooperate.
- Inspector's Question M3 (iv) 7.
- Previously Mod 1.2.

							SA	FRAMEWOR	K OBJECTI\	/ES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)	ENVIRONM	ENTAL QUAI	LITY	(D) COMMUNITY WELL-BEING			
	SUFFICIENCY To provide sufficient sites & waste facilities for al waste streams making up the		RECOVERY To drive waste management cup the waste hierarchy.	ECONOMY To promote a transition to a circular	MITIGATION To address the causes of climate change by minimising CO ₂ emissions	all waste management	SuDS To avoid, reduce and manage flood risk to or from waste management	sustainable	TRANSPORT To reduce trips, traffic	AIR QUALITY To minimise air pollution and impacts on sensitive landuses arising from waste facilities	MENTAL PROTECTION To minimise	habitats		impacts on townscape quality and	QUALITY OF LIFE To minimise adverse on human health and protect the	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 5 Para 3.11 - page 12 Amend as follows: The task for the South London Waste Plan boroughs was to ensure that net self-sufficiency can be achieved and those facilities outside the South London waste plan area which receive South London waste are able to do so in the future. No planning issues have been identified which will prevent the continued cross-boundary movements of waste and the achievement of this task can be seen in the Statements of Cooperation which accompany this plan. The Boroughs will continue to monitor cross-boundary movements of waste and engage with relevant authorities through the duty to cooperate, so any substantial changes can be considered in accordance with Appendix 1 'Monitoring'.	++	++	++	++					+	+						
NOTES Purpose: Duty to Cooperate Inspector's Question M3 (i) 5. Previously Mod 1.3 MODIFICATION 5.1 (Post EiP) Figure 7 - page 13 Replace Figure 7 with the updated version as follows: NOTES Purpose: To ensure figures covered a 15-year Plan period from adoption, as required by	MEDIUN promoti SMALL	ing the SLWF MENEFICIAL Ing waste re- BENEFICIAL	L IMPACTS (++ use, recycling	ond recovery we for (9) deliver	oting net self- vithin South Lo	sufficiency with ndon.and (4) h e transport obj	in South Lond elping to sect ectives with t	don (2)Promoti ure the transiti	ng an environ on to a circula and (10) melpi	vant authorities mentally susta or economy; an ing to minimise al change	inable strateg id	ic approach to	managing Sou	uth London's w		

PAGE 19 Section	n 2: Appraisal of Main SLWP Modifications
	SA FRAMEWORK OBJECTIVES
	(A) SUSTAINABLE WASTE MANAGEMENT (B) CLIMATE CHANGE (C) ENVIRONMENTAL QUALITY (D) COMMUNITY WELL-BEING
	(1) (2) (3) (4) (5) (6) (7) (8) FLOOD RISK & SUST. DESIGN SUSTAINBLE SUFFICIENCY To provide sufficient sites and intensify under the waste sites to hierarchy. Waste streams make the mos making up the efficient use o apportionment industrial land (15) (15) (16) (15) (16) (15) (16) (15) (16) (15) (16) (15) (16) (16) (15) (16) (15) (16) (16) (17) (18) (19) (19) (19) (19) (19) (19) (19) (19
MODIFICATION 6 Para 3.16 First Sentence – page 14 "The London Plan sets a target that in London 95% of excavation waste will go to beneficial use and recycle and reuse 95% of construction and demolition waste will be reused, recycled or recovered 95% of Construction and Demolition Waste by 2020." NOTES Previously Mod 1.4. Purpose: To improve clarity and to ensure the wording in the SLWP is consistent with the 2021 London Plan and NPPF.	No significant impacts – factual change
MODIFICATION 6.1 (Post EiP) Figure 8 – page 14 Update Figure 8 as follows: NOTES Purpose: To ensure figures covered a 15-year Plan period from adoption, as required by the NPPF.	No significant impacts – factual change No significant impacts – factual change
MODIFICATION 7A Para 4.2 - page 19 Amend as follows: "To achieve the vision, the South London Waste Plan has the following objectives, which will be delivered through the policies in the Plan:" NOTES • Purpose: For clarity • Previously Mod 1.4.	No significant impacts – for clarity

							SA	FRAMEWOR	RK OBJECTI\	/ES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)	ENVIRONM	ENTAL QUAL	.ITY	(D) COMMUNITY WELL-BEING			
	SUFFICIENCY To provide sufficient sites & waste facilities for al waste streams making up the		RECOVERY To drive waste management up the waste hierarchy.	ECONOMY To promote a	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	ADAPTATION To ensure that all waste management facilities are fully adapted to	SuDS To avoid, reduce and manage flood risk to or from waste management	SUST. DESIGN To promote the highest standards of sustainable design and	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste - related HGV movements	To minimise air pollution and impacts on	MENTAL	SITY AND HABITATS To protect and enhance biodiversity & habitats	EMPLOYMENT To promote employment , & competitive- ness of the	AND VISUAL AMENITY To minimise adverse impacts on townscape quality and	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 7B Para 4.2 - page 19 Amend as follows: "Objective 1: To plan for net self- sufficiently by Meet the 2019 ItP London Plan meeting the 2021 London Plan target for Household and Commercial and industrial waste. • To be delivered through Policies WPAGE 1, WP3 and WP4."	+++	+++	++	++					++	++			++			
NOTES Purpose: To incorporate the core aim of net self-sufficiency Inspector's Question M3 (i) 9. Previously Mod 1.5 pt (a).	(Objective 1) • LARGE • MEDIUM	Ting the core and for othe BENEFICIAL I BENEFICIAL	r forms of was MPACTS (+++ . IMPACTS (++	te including Co) for (1) prom) for (3) prom	onstruction and oting net self-self-self-self-self-self-self-self-	Demolition (C sufficiency with e-use, recycling	&D), excavati in South Lond and recover	on, low level r don and (2) pro www.www.mithin South	adioactive and omoting an en London (4) he	onment targets agricultural wavironmentally selping to secure ing local emplo	aste, Proposed sustainable str e the transition	Modification ategic approact to a circular c	1.x is assessed th to managing economy (9) h	I as having: g South Londor elping to delive	n's waste aris er sustainabl	sings); and e transport
MODIFICATION 7C Para 4.2 – page 19 Amend as follows: "Objective 2: To plan for net self- sufficiently by meeting Meet the identified needs for Construction and Demolition Waste, Excavation Waste, Low Level Radioactive Waste, Agricultural, where practical or necessary. To be delivered through Policies WP2, WP3 and WP4."		+++	++	++	To all points				++	++	,		++		2. 3.1.2 1149	
NOTES Inspector's Question M3 (i) 9. Previously Mod 1.5.	(Objective 1) • LARGE • MEDIUN	ting the core) and for othe BENEFICIAL I 4 BENEFICIAL	r forms of was MPACTS (++) . IMPACTS for (te including Co for (1) Promot (3) Promoting	instruction and ing net self-su waste re-use,	Demolition (Conficiency within recycling and	&D), excavati South Londo ecovery withi	on, low level r n and (2) Pror n South Londo	adioactive and moting an envi in (4) helping	nment targets I agricultural ware ronmentally su to secure the tr ing local empl o	aste, Proposed stainable strat ansition to a c	Modification : egic approach ircular econon	1.x is assessed to managing to managing to the second to t	l as having: South London's to deliver sus t	s waste arisir ainable trans	ngs); and

			SEWP Mou				SA	FRAMEWOR	RK OBJECTI	VES						
	(A) SUS	STAINABLE '	WASTE MAN	IAGEMENT		(B) CLIMAT	E CHANGE		(C)) ENVIRONM	ENTAL QUAL	_ITY	(D) COMMUNITY WELL-BEING			
	& waste facilities for al waste streams making up the	SPATIAL STRATEGY To optimise		circular economy withir	MITIGATION To address the causes of climate change by minimising CO ₂ emissions	facilities are fully adapted to	SuDS To avoid, reduce and manage flood risk to or from waste management		TRANSPORT	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land- uses arising from waste facilities	(11) ENVIRON- MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	enhance biodiversity &	(13) ECONOMY & EMPLOYMENT To promote employment , & competitive- ness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	QUALITY OF LIFE To minimise adverse on human health and protect the	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 7D Para 4.2 – page 19 Amend as follows: "Objective 3: Safeguard the existing waste sites to meet these targets and needs on existing sites, as set out on Pages 44-91 of this plan. • To be delivered through Policies WP3 and WP4." NOTES • Purpose: For clarity. • Inspector's Question M3 (i) 9. • Previously Mod 1.5b			No signi	ficant impa		e the propo ot have a i								t policies,		
MODIFICATION 7E Para 4.2 - page 19 Amend: Objective 4: Ensure there is Support the need for sufficient land for other industrial uses within the South London Waste Plan area's industrial estates by not safeguarding more land for waste management than is required. To be delivered through Policies WPAGE 1, WP2, WP3 and WP4. NOTES	COMMENTAR												++			
 Inspector's Question M3 (i) 9. Previously Mod 1.5c. MODIFICATION 7G Para 4.2 - page 19 "Objective 6: Ensure the effects of new development are mitigated and, where possible, enhance amenity. To be delivered through Policies WP4, WP5, WP6, WP8 and WP9" NOTES Purpose: For clarity. Inspector's Question M3 (i) 9. Previously Mod 1.5b 	By including • MEDIU	the aim of no	. IMPACTS in to loyment and S	erms of (2) pro outh London's	economy by en	ement than is rivironmentally sometiment substitution of the property of the property of have a result of the property of the	ustainable sti fficient land i	rategic approace n strategic inde	ch to managin ustrial location	g South Londons (SILs) and lo	n's waste arisinocally significan	ngs which mak it industrial loo	ne relevan) is available fo		

							SA	FRAMEWOR	RK OBJECTI	/ES						
	(A) SUS	STAINABLE	WASTE MAN	IAGEMENT		(B) CLIMAT	E CHANGE		(C)	ENVIRONM	ENTAL QUAL	LITY	(D)	COMMUNIT	Y WELL-BE	ING
	& waste facilities for al waste streams making up the	To optimise and intensify	up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	causes of climate change by minimising	facilities are fully adapted to	FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management	standards of sustainable design and	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on	MENTAL	SITY AND HABITATS To protect and enhance biodiversity & habitats	EMPLOYMENT To promote employment, & competitiveness of the	AND VISUAL AMENITY To minimise adverse impacts on townscape quality and	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 7H Para 4.2 - page 19 Amend as follows: "Objective 7: To support the movement of waste as far up the waste hierarchy as practicable. To be delivered through Policies WP3 and WP7"	++	++	+++	+++	++				++	++	+		+++	+	+	+
NOTES Purpose: New objective suppprtin movement of waste as high up th waste hierarchy as possible Inspector's Question M3 (i) 9. Previously Mod 1.5 (d)	 LARGE I London' MEDIUM helping sensitive SMALL I adverse 	TARY Ing a new SLWP objective supporting the movement of waste as far up the waste hierarchy as practoicable, this proposed modification assessed as having: E BENEFICIAL IMPACTS (+++) for (3) Promoting waste re-use, recycling and recovery within South London (4) helping to secure the transition to a circular economy; and (13) promoting local employment, South on's economy and the competitiveness of the waste sector UM BENEFICIAL IMPACTS (++) in terms of (1) Promoting net self-sufficiency within South London (2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings (5) age to minimise CO ₂ emissions and address the causes of climate change (9) helping to deliver sustainable transport objectives with the plan area; and (10) helping to minimise air pollution and potential impacts involved in the plan area; and (10) helping to minimise air pollution and potential impacts in the plan area; and (11) helping to protect and enhance biodiversity and habitats (14) minimising se impacts on the quality of townscape and visual amenity and the historic environment (15) minimising potentially adverse effects on human health and the open environment; and (16) promoting equalities, sibility and social inclusion.														arisings (5) al impacts on mising
MODIFICATION 7I Para 4.2 - page 19 Amend as follows: "Objective 8: To deliver waste management capacity in line with the proximity principle and to support the co-location of facilities to minimise waste movements and support opportunities for the circular economy. To be delivered through Policies WPAGE 1, WP2, WP3, WP4, WP5 and WP7"	++	+++	+++	+++	++				++	++	++	+	+++	+	+	+
NOTES • Purpose: New objective aimed at applying the proximity principle, supporting co-location and promoting the Ciurcular Economy • Inspector's Question M3 (i) 9. • Previously Mod 1.5e.	LARGE I London quality of accessible MEDIUM transpor SMALL I	new SLWP OBENEFICIAL I (4) helping to of townscape oility and social BENEFICIAL it objectives is BENEFICIAL I	MPACTS (+++ o secure the tra and visual ame al inclusion wit IMPACTS (++ with the plan a MPACTS (+) fo) for (2) Promo ensition to a cinenity and the hin South Lond) for (1) Promorea (10) Helpir r (14) minimis	oting an environt rcular economy nistoric environ don. oting net self-seng to minimise sing adverse im	inciple, support inmentally sust y; and (13) pro iment (15) Help sufficiency within air pollution ar inpacts on the quend social inclus	minable strate moting local or sing to miniminal or South Lond and potential in uality of town	gic approach to the semployment, Some semble	o managing S South London's adverse effect to minimise C sitive land-use	outh London's control of seconomy and son human here con control of the control o	waste arisings the competitive ealth and the o and address thing adverse im	(3) Promoting veness of the veness of the veness of the venes of cline e causes of cline e pacts arising f	g waste re-use waste sector (ent; and(16) h mate change (from construct	e, recycling and 14) minimising telping to prom 9) helping to coion and operat	d recovery we adverse implemente equalities deliver sustain ion of waste	ithin South pacts on the es, nable facilities

SA FRAMEWORK OBJECTIVES (A) SUSTAINABLE WASTE MANAGEMENT (B) CLIMATE CHANGE (C) ENVIRONMENTAL QUALITY (D) COMMUNITY WELL-BEING (5) (10)(11)(12)(13)(14)(15)(16)RECYCLING & **HEALTH &** FLOOD RISK SSUST. DESIGN SUSTAINBLE AIR QUALITY **ENVIRON-**BIODIVER-ECONOMY & **EQUALITIES**, NET SELF-**SPATIAL** CIRCULAR CLIMATE CLIMATE **TOWNSCAPE** SUFFICIENCY STRATEGY ADAPTATION SITY AND **EMPLOYMENT** AND VISUAL **QUALITY OF** SOCIAL RECOVERY **ECONOMY MITIGATION** SuDS TRANSPORT MENTAL To minimise ai To promote the HABITATS LIFE **INCLUSION** PROTECTION AMENITY To promote To provide To ensure that To avoid, To reduce To optimise To drive waste To promote a To address the niahest pollution and To protect and sufficient sites and intensify standards of trips, traffic To minimise To reduce management transition to a causes of all waste reduce and mpacts on employment, To minimise To minimise & waste manage flood sustainable sensitive landnew & existing up the waste climate change management the adverse enhance & competitiveadverse adverse on exclusion, circular congestion facilities for all waste sites to hierarchy. facilities are and pollution biodiversity & address economy within by minimising risk to or from design and uses arising impacts during ness of the mpacts on numan waste streams make the mos south London. CO₂ emissions fully adapted to waste from waste rom waste construction & habitats health and inequalities construction. waste sector townscape making up the efficient use o quality and from waste the impacts of management related HGV facilities operation of Sth London protect the & improve apportionment industrial land facilities climate change facilities movements waste facilities isual amenity open environment **MODIFICATION 7J Para 4.2 – page 19** Amend: "Objective 9: To ensure the delivery of sustainable waste development within South London ++ ++++ ++ through the integration of social, environmental and economic considerations. To be delivered through Policies WPAGE 1 to WP9"

NOTES

- Purpose: New objective aimed at integrating the full range of social, environmental and economic considerations in delivering sustainable waste development in South London.
- Inspector's Question M3 (i) 9.
- Previously Mod 1.5e.

COMMENTARY

Purpose: New objective aimed at integration integrate the full range of social, environmental and economic considerations in delivering sustainable waste development in South London, this proposed modification (assuming that the new objective is delivered over the plan period) is expected to have:

- LARGE BENEFICIAL IMPACTS (+++) for (1) Promoting net self-sufficiency within South London (2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings) (3) Promoting waste re-use, recycling and recovery within South London (4) helping to secure the transition to a circular economy
- MEDIUM BENEFICIAL IMPACTS for (5) helping to minimise CO₂ emissions and address the causes of climate change (6) helping to ensure that all new or upgraded waste management facilities are adapted to the future impacts of climate change (7) helping to avoid, reduce and manage flood risk to and from waste developments (8) helping to promote the highest standards of sustainable design and construction in new or upgraded waste facilities (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities (12) helping to protect and enhance biodiversity and habitats (13) promoting local employment, South London's economy and the competitiveness of the waste sector (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) Helping to minimise potentially adverse effects on human health and the open environment; and (16) helping to promote equalities, accessibility and social inclusion within South London.

MODIFICATION 7.1 (Post EiP) Figure 11 – page 22

Update Figure 11 as follows:

Purpose: To ensure figures cover 15-year period from adoption, as required by the NPPF and to ensure consistency within the SLWP

Figure 11 Arisings and Apportionment at 2022 and 2037

Porough	20	ZZ	20	3/
Borough	Arisings	Apportionment	Arisings	Apportionment
Croydon	306,100	252,800	322,600	264,800
Kingston	152,400	187,600	158,400	196,600
Merton	174,500	238,750	182,000	250,000
Sutton	161,550	211,650	169,800	221,400
Total	794.550	890.800	832.800	932,800

No significant impacts – factual change

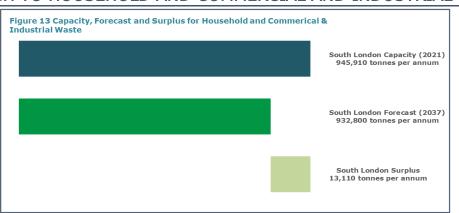
WP1 STRATEGIC APPROACH TO HOUSEHOLD AND COMMERCIAL AND INDUSTRIAL WASTE

MODIFICATION 8 (Post EiP) Figure 13 – page 23

Replace Figure 13 with the updated version as follows:

NOTES

Purpose: To ensure figures cover 15-year period from adoption, as required by the NPPF and to ensure consistency within the SLWP



No significant impacts – factual change

							SA	FRAMEWOR	RK OBJECTIV	/ES						
	(A) SUS	STAINABLE	WASTE MAN	IAGEMENT		(B) CLIMAT	E CHANGE		(C)	ENVIRONM	ENTAL QUAL	.ITY	(D)	COMMUNIT	Y WELL-BE	ING
	SUFFICIENCY To provide sufficient sites & waste facilities for al waste stream making up the		up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy withir south London.	CLIMATE MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	ADAPTATION To ensure that all waste management	FLOOD RISK 8 SuDS To avoid, reduce and manage flood risk to or from waste management	SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive landuses arising from waste facilities	MENTAL PROTECTION To minimise	SITY AND HABITATS To protect and enhance biodiversity & habitats	EMPLOYMENT To promote employment, & competitive- ness of the	AND VISUAL AMENITY To minimise adverse impacts on townscape	QUALITY OF LIFE To minimise adverse on human health and protect the	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 9 (Post EiP) Para 4.2 – page 19 Amend as follows: "As such, the boroughs will not normally support new waste sites coming forward (outside of sites providing compensatory provision, as set out in Policy WP3), unless there are exceptional circumstances that justify it. This strikes a balance between meeting the apportionment, achieving net self-sufficiency and not stifling industrial land uses, whilst giving some flexibility for new waste sites to be delivered in appropriate circumstances. Applications outside of safeguarded waste sites will not be supported unless it can be demonstrate that then is a need for such a facility, having regard to the latest Waste Authority Monitoring Report and the ability of the Plan to meet the London Plan apportionment figure. In addition, applicants will need to provide evidence as to why it is not possible to use, expand or intensify an existing safeguarded waste site (as set out on pages 44-91 of this Plan). Furthermore, applications proposing waste facilities outside of the existing safeguarded sites will not be supported unless it can be demonstrated that the proposed site would be better suited to meeting the identified need for South London having regard to delivering the vision and objectives of the South London Waste Plan. For example, there may be an opportunity for small scale expansion of an existing site onto adjacent land which helps facilitate the maximum use of an existing waste site and enable co-location of facilities.	+	+++	+++	+	+			+	+++	+++	++		++	+++		+++

PAGE 23 GEORGIA		- CLVI mounications			SA	FRAMEWOR	RK OBJECTIV	/ES						
	(A) SUSTAINABLE	WASTE MANAGEMENT		(B) CLIMATE				ENVIRONM	ENTAL QUAL	.ITY	(D)	COMMUNIT	Y WELL-BE	ING
	(1) NET SELF- SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams make the momaking up the apportionment (2) SPATIAL STRATEGY To optimise and intensify new & existir waste sites to make the momaking up the apportionment (1)	south London.	CLIMATE MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of	SuDS To avoid, reduce and manage flood risk to or from	sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on	MENTAL PROTECTION		EMPLOYMENT To promote employment, & competitiveness of the	AND VISUAL AMENITY To minimise adverse impacts on townscape quality and	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 9 (continued) There may be instances in the future where advances in waste technologies are such that existing sites do not meet the technical requirements of a proposed waste management facility, for example, the identified locations might be too small for the proposed development or the facility may need to be located near a specific waste producer. In any event, a new waste site will have to satisfy the locational criteria set out in Policy WP4 (b) to (g). The list of safeguarded waste sites will be reviewed and updated on an annual basis in the Waste Authority Monitoring Report and new sites will be safeguarded for waste uses once operational."	+ +++	+++ +	+			+	+++	+++	++		++	+++	+++	+++
Purpose: To strengthen the	order, promoting co-loca • LARGE BENEFICIAL London(9) helping t townscape and visu social inclusion with	AL IMPACTS (++) for (11) min	balance between oting an environ to objectives with vironment (15)	en meeting the nmentally susta n the plan area Helping to min	apportionme ainable strate (10) Helping imise potent	ent, achieving egic approach g to minimise a ially adverse e	net self-suffic to managing S air pollution ar ffects on hum	iency and not so South London's and potential implian health and	stifling industria waste arisings pacts on sensit the open envir	al land uses, t) (3) Promotir ive land-uses(onment; and(his proposed mag waste re-us (14) minimising (16) helping to	nodification is e, recycling ar g adverse impa promote equa	expected to had recovery wacts on the qlities, access	nave:. vithin South uality of ibility and

SMALL BENEFICIAL IMPACTS (+) for (1) Promoting net self-sufficiency within South London (4) helping to secure the transition to a circular economy(5) helping to minimise CO₂ emissions and address the causes of climate change, and (8) helping to promote the highest standards of sustainable design and construction in new or upgraded waste facilities

							SA	FRAMEWOR	RK OBJECTI	VES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)) ENVIRONM	ENTAL QUAI	LITY	(D)	СОММИНІТ	TY WELL-BE	ING
	SUFFICIENCY To provide sufficient sites & waste facilities for al waste streams	new & existing waste sites to make the mosefficient use of	RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy withir south London.	climate change by minimising CO ₂ emissions from waste	ADAPTATION To ensure that all waste	SuDS To avoid, reduce and manage flood risk to or from waste management	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive landuses arising from waste facilities	(11) ENVIRON- MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	habitats	(13) ECONOMY & EMPLOYMENT To promote employment , & competitive- ness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	QUALITY OF LIFE To minimise adverse on human health and protect the	(16) EQUALITIES, SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
WP2 STRATEGIC APPROA	ACH TO O	THER FOR	RMS OF WA	STE												
MODIFICATION 10.1 (Post EiP) Figure 14 – page 24 Updte Figure 14 as follows: NOTES Purpose: To ensure figures cover 15-year period from adoption, as required by the NPPF and to ensure consistency within the SLWP	Croydon Kingston Merton Sutton Total	ough	2022 Arisings 293,381 37,966 48,391 15,707 395,445		2037 Arisings 305,058 39,040 54,314 16,607 415,019		No signifi	cant impa	cts – factu	al change						
MODIFICATION 11 Figure 15 – page 24 NOTES • Purpose: To ensure figures cover 15-year period from adoption, as required by the NPPF and to ensure consistency within the SLWP.	Figure 15 Capa	city, Forecast and	Surplus for Constru	ction and Demolitio	South London Capaci 568,162 tonnes per South London Foreca 415,019 tonnes per South London Surp 153,173 tonnes per a	st (2037) annum	No signifi	cant impa	cts – factu	ıal change						
MODIFICATION 12 (Post EiP) Para 5.17 after last sentence – p26 Add new sentence as follows: "As such, the Boroughs will not normally support new sites coming forward unless there are exception circumstances that justify it, as set out in Policy WP2 (e)."	á	+							+	+	+	+		+	+	
NOTES • Purpose: To strengthen the clarity of the SLWP with regards to new sites to ensure consistency with the 2021 London Plan and national policy and to ensure the SLWP is instituted and effective.	• (VERY) SI area (10) enhance I	orting the dev MALL BENEFI Helping to n	CIAL IMPACTS ninimise air po nd habitats (14	for (2) promo llution and po	ting an enviror tential impacts	nmentally sust on sensitive l	ainable strate and-uses (11	gic approach t) minimising t	to managing S the adverse in	this proposed routh London's appacts arising for the historic envi	waste arisings	(9) helping to	o deliver susta peration of wa	ste facilities ((12) helping t	o protect an

justified and effective.

							SA	FRAMEWOR	RK OBJECTIV	/ES						
	(A) SUS	STAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)	ENVIRONM	ENTAL QUAL	.ITY	(D)	COMMUNIT	Y WELL-BE	ING
	& waste facilities for al waste streams making up the	To optimise and intensify	RECOVERY To drive waste management up the waste hierarchy.	ECONOMY To promote a transition to a circular economy within	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	ADAPTATION To ensure that all waste management facilities are fully adapted to	SuDS To avoid, reduce and manage flood risk to or from waste management	sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste - related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive landuses arising from waste facilities		SITY AND HABITATS To protect and enhance biodiversity & habitats	EMPLOYMENT To promote employment, & competitiveness of the	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	QUALITY OF LIFE To minimise adverse on human health and protect the	(16) EQUALITIES, SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 13 (Post EiP) Para 5.18 after last sentence -p 26 Add new sentence as follows: " Given the relatively small tonnage of this waste, the fact that it can be mixed with C&I Waste and C&D Waste and that it is often dealt with by C&I and C&D waste facilities, there is no need for the SLWP boroughs to provide for this waste stream, unless exceptional circumstances would justify this type of development, as set out in Policy WP2 (e)" NOTES	COMMENTAI								+	+	+	+		+	+	
 Purpose: To strengthen the clarity of the SLWP with regards to new sites to ensure consistency with the 2021 London Plan and nationa policy and to ensure the SLWP is justified and effective. 	• (VERY) S area (10) enhance l	MALL BENEFI Helping to n	CIAL IMPACTS ninimise air po nd habitats (14	for (2) promot llution and pot	ting an enviror ential impacts	ddiobal capacit nmentally susta on sensitive la s on the quality	ainable strate and-uses (11	gic approach to minimising th	o managing S he adverse im	outh London's pacts arising f	waste arisings rom the const	(9) helping to ruction and or	o deliver susta peration of wa	ste facilities (12) helping t	o protect and
MODIFICATION 14 (Post EiP) Para 5.19 after last sentence p 26 Add new sentence as follows: "As such, the Boroughs will not normally support new sites coming forward unless there are exceptional circumstances that justify them, as set out in Policy WP2 (d)."		+							+	+	+	+		+	+	
NOTES • Purpose: To strengthen the clarity of the SLWP with regards to new sites to ensure consistency with the 2021 London Plan and national policy and to ensure the SLWP is justified and effective	proposed mo • (VERY) S transport helping to	that new site odification is e MALL BENEFI objectives will protect and e	expected to have CIAL IMPACTS th the plan are enhance biodive	ve: (+) for ((2) Prea (10) miniminates (10) miniminates (arsity and habi	romoting an er sing air polluti tats (13) prom	hazardous was nvironmentally on and potention oting local emp ng potentially a	sustainable s al impacts on loyment, Sou	trategic appro- sensitive land th London's ec	ach to manag l-uses (11) mi	ing South Lond nimising the a e competitiven	don's waste ari dverse impact ess of the wast	sings – includ s arising from te sector (14)	ing hazardous the constructi minimising adv	waste (9) hel on and operat	ping to delive ion of waste on the quality	er sustainable facilities (12) of townscape

							SA	FRAMEWOR	RK OBJECTI	VES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)) ENVIRONM	ENTAL QUAI	_ITY	(D)	COMMUNIT	Y WELL-BE	ING
	SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	RECOVERY To drive waste management up the waste hierarchy.	ECONOMY To promote a transition to a circular economy within south London.	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste facilities	To ensure that all waste	SuDS To avoid, reduce and manage flood risk to or from waste management	sustainable design and	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive landuses arising from waste facilities	MENTAL	HABITATS To protect and enhance biodiversity &	EMPLOYMENT To promote employment, & competitiveness of the		(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 14.1 (Post EiP) Figure 16 – page 27 Replace Figure 16 with the updated version below: NOTES • Purpose: To ensure figures covered a 15-year Plan period from adoption, as required by the NPPF and to ensure consistency within the SLWP.	Bor Croydon Kingston Merton Sutton Total	azardous Wasi rough	2022 Aris 9,000 2,400 4,59 5,230 21,24	sings 8 4 1	(tpa) 2037 Arising 9,217 2,442 4,704 5,328 21,692		No signifi	cant impac	cts – factu	al change						
MODIFICATION 15 (Post EiP) After Para 5.21 – page 28 Insert new paragraph as follows: "The list of safeguarded waste sites will be reviewed and updated on an annual basis in the Waste Authority Monitoring Report and new sites will be safeguarded for waste uses once operational."	++	++	+	++									++			
NOTES • Purpose: To strengthen the clarity of the SLWP with regards to new sites to ensure consistency with the 2021 London Plan and national policy and to ensure the SLWP is justified and effective	MEDIUM E secure the	waste manage BENEFICIAL II e transition to	MPACTS (++) f a circular ecor	for (1) Promot nomy (13) pro	ing net self-su moting local e	nual review and Ifficiency within mployment, So recycling and r	South Londouth London's	n (2) Promotir economy and	ng an environr the competiti v	mentally susta i	nable strategio				aste arisings	(4) helping to

							SA	FRAMEWOR	RK OBJECTI\	/ES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)	ENVIRONM	ENTAL QUAL	.ITY	(D)	COMMUNIT	Y WELL-BE	ING
		STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use of	To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy withir south London.	MITIGATION To address the causes of climate change by minimising CO ₂ emissions	ADAPTATION To ensure that all waste management	SuDS To avoid, reduce and manage flood risk to or from waste management	sustainable design and	TRANSPORT To reduce trips, traffic	To minimise air pollution and impacts on	MENTAL	SITY AND HABITATS To protect and enhance biodiversity &	EMPLOYMENT To promote employment, & competitiveness of the	impacts on townscape quality and	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 16 (Post EiP – partly) Policy WP2 – page 28 Amend Policy WP2 as follows: "WP2 Strategic Approach to Other Forms of Waste (a) During the lifetime of the plan, the boroughs of the SLWP will seek to meet the forecast arisings for C&D waste of managing 415,019 tpa within their boundaries across the plan period to 2037 (b) New sites (either transfer or management) will not normally be supported for Construction and Demolition Waste, Radioactive Waste, Agricultural Waste and Hazardous Waste, unless: (i) They are for compensatory provision (in accordance with Policy WP4); or (ii) there is an identified need for such a facility within the South London Waste Planarea that cannot be met on a site elsewhere in London; and (iii) there is robust evidence that existing safeguarded sites within the SLWP area are not available or suitable, or that needs cannot be met through the adaption or intensification of existing facilities; and (iv) they would manage waste as high up the waste hierarchy as practicable; and (v) they would accord with all relevant aims and policies of the SLWP (particularly the locational criteria set out in Policy WP4 (b) to (e)) and the applicable borough's Development Plan,	++	+++	+++	++	+	+	+	+	+++	+++	++	+	+	+++	+ + +	+++
(Former parts (c) and (d) 'renumbered' as parts (d) and (e): Previously Mod 1.6) NOTES To encure the policy is consistent with	COMMENTAR									ing fac COD as	d able to farme		:			
 To ensure the policy is consistent wit national policy and is justified and positively prepared. Previously Mod 1.6 (in part) 	the apportion expected to be constructed in the future of the constructed in the cons	nment, and b have: BENEFICIAL I (9) helping to 4) minimising 4 BENEFICIAL ction and open nclusion withi BENEFICIAL I ure impacts of	in of waste many promoting co IMPACTS (+++ o deliver sustain g adverse impa IMPACTS (++ eration of new in n South London IMPACTS (+) for f climate change cion in any new	or (5) minimising (2) prompts (5) minimising (7) helping (1)	oting an environt objectives will lity of townscapting net self-s, and (13) prorong CO ₂ emission avoid, reduction	onmentally sust the plan area pe and visual a ufficiency withi moting local em ons and address e and manage	tainable strate (10) minimi menity and the n South Lond nployment, So s the causes of flood risk to a	egic approach sing air polluti he historic env on (4) helping buth London's of climate char and from any r	to managing S on and potenti ironment (15) to secure the economy and nge (6) helping new waste dev	Gouth London's ial impacts on self-the transition to a the competitive of to ensure that elopments outs	waste arisings sensitive land- nimise potentia circular econo eness of the was any new was side of safeguare.	d not stifling in (3) Promoting uses arising frally adverse effing (11) mining aste sector, and te managements)	ndustrial land using waste re-us for any new wastes on humanising the advend (16) helping the facilities out	se, recycling and vaste facilities in health and the erse impacts and the promote easide of safegua	nd recovery woutside of sai he open enviousing from the equalities, according	vithin South feguarded ronment; and he cessibility and re adapted to

PAGE 31 Section	2: Appraisal of Main SLWP Modifications			
		SA FRAMEWO	RK OBJECTIVES	
	(A) SUSTAINABLE WASTE MANAGEMENT (B) CLII	MATE CHANGE	(C) ENVIRONMENTAL QUAL	LITY (D) COMMUNITY WELL-BEING
	(1) NET SELF- SUFFICIENCY To provide sufficient sites and intensify new & existing up the waste streams making up the efficient use o apportionment industrial land (2) SPATIAL SCYCLING & RECYCLING & RECOVERY To drive waste management management up the waste dicircular economy within south London. (5) CLIMATE MITIGATION To address the causes of climate change by minimising facilities are facilities are facilities. (6) CLIMATE MITIGATION To ensure the causes of climate change by minimising facilities are facilities. (6) CLIMATE MITIGATION To ensure the causes of climate change by minimising facilities are facilities. (6) CLIMATE MITIGATION To ensure the causes of climate change by minimising facilities are facilities. (6) CLIMATE MITIGATION To ensure the causes of climate change by minimising facilities are facilities.	hat To avoid, reduce and standards of manage flood risk to or from design and waste ropinite at highest standards of sustainable construction.	N SUSTAINBLE AIR QUALITY TO reduce pollution and trips, traffic impacts on To minimise	habitats waste sector in townscape health and inequalities Sth London quality and protect the & improvements in the control of
WP3 SAFEGUARDING OF	EXISTING WASTE SITES			
MODIFICATION 17 Para 5.24 – page 29 Amend paragraph as follows: "In order to use land efficiently and to ensure the viability of existing businesses, the South London Waste Plan boroughs will allow the intensification of uses, as appropriate, on the safeguarded sites to allow a greater throughput on the site. This includes intensification or redevelopment to provide compensatory provision." NOTES Purpose: To strengthen the clarity of the SLWP with regards to how compensatory provision can be delivered Inspector's Question M3 (vi) 11. Previously Mod 1.7	This modification has been proposed in order to clarif redevelopment to provide compe	y that the intensificati		
MODIFICATION 18 Para 5.24 – page 29 Amend paragraph as follows: "Similarly, the South London Waste Plan boroughs will be supportive of businesses which are attempting to increase the waste management element of Waste Transfer Stations but any development associated with an increase in the waste management element of Waste Transfer Stations will have to comply with all the relevant policies in a borough's Development Plan." NOTES Purpose: Contributes to consistency, clarity and/or correct errors Inspector's Question M4 (vii) 1. Previously Mod 1.8	This m	_	ant impacts – roposed for purposes of clarity	

							SA	FRAMEWOR	RK OBJECTIV	/ES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)	ENVIRONM	ENTAL QUAI	_ITY	(D)	COMMUNIT	Y WELL-BE	ING
	SUFFICIENCY To provide sufficient sites & waste facilities for al waste streams making up the	STRATEGY To optimise	hierarchy.	ECONOMY To promote a transition to a circular	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	ADAPTATION To ensure that all waste	SuDS To avoid, reduce and manage flood risk to or from waste management	highest standards of sustainable	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	AIR QUALITY To minimise air pollution and impacts on sensitive landuses arising from waste facilities	MENTAL PROTECTION To minimise	habitats	(13) ECONOMY & EMPLOYMENT To promote employment , & competitive- ness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 19 (Post EiP) Para 5.25 Second Sentence and after Para 5.25 – page 29 Add new sentence to end of Para 5.25 and insert new paras as follows: "The 2019 ItP 2021 London Plan states waste sites should only be released to other land uses where processing capacity is re-provided elsewhere in London, based on the maximum achievable throughput of the site proposed to be lost. When assessing the throughput of a site, the maximum throughput achieved over the last five years should be used; where this is not available potential capacity of the site should be appropriately assessed" (paragraph 9.9.2). The Environment Agency's Waste Data Interrogator should be used when assessing the maximum throughput achieved over the last five years. Applicants will need to demonstrate that provision of replacement capacity is secured before permission is granted for a non-waste use. This could be through the intensification of an existing safeguarded waste site or a compensatory site of a suitable size to meet at least the maximum annual throughput, subject to the requirements of Policy WP4. Boroughs will use conditions or legal agreements to satisfy themselves that compensatory capacity will be delivered before a safeguarded waste site is released to another use.	+++	+++	++	++					+++	+			++			

							SA	FRAMEWOR	RK OBJECTI	VES						
	(A) SUS	STAINABLE	WASTE MAN	IAGEMENT		(B) CLIMAT	E CHANGE		(C)) ENVIRONM	ENTAL QUAL	_ITY	(D)	COMMUNIT	Y WELL-BE	ING
	SUFFICIENCY To provide sufficient sites & waste facilities for al waste streams making up the	STRATEGY To optimise and intensify		(4) CIRCULAR ECONOMY To promote a transition to a circular economy withir south London.	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	ADAPTATION To ensure that all waste management facilities are fully adapted to	SuDS To avoid, reduce and manage flood risk to or from waste management		(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	AIR QUALITY To minimise air pollution and impacts on sensitive landuses arising from waste facilities	MENTAL PROTECTION To minimise	enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment , & competitive- ness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
In accordance with Policy SI 9 of the 2021 London Plan compensatory capacity should be provided within London. If it can be demonstrated that there is sufficient capacity in London to meet London's apportionment and net self-sufficiency targets, it may be possible to justify the release of waste sites for other uses without the provision of compensatory provision. The evidence base supporting the economic policies in the 2019 ItP 2021 London Plan clearly demonstrates that the South London Waste Plan area has exceptional demand for business and industrial land from non-waste uses	+++	+++	++	++					+++	+			++			
NOTES • To ensure the policy is consistent wit national policy and is justified and positively prepared.	area, whilst no modification is • LARGE BEI London's w • MEDIUM B minimise C	hat replacemer ot stifling other s expected to h NEFICIAL IMPA vaste arisings), ENEFICIAL IMF CO ₂ emissions a	r land uses that have: ACTS (+++) for and (9) helping PACTS (++) for and address the	(1) promoting rto deliver susta(3) Promoting w	nd (e.g. through et self-sufficien nable transport raste re-use, rece change, and (:	cy within South objectives with texting and recovers. The promoting logical interpretation in the covers of the c	of an existing s London and (2 the plan area very within Socal employmer	safeguarded was 2) promoting ar uth London (4) nt, South London	ste site or a com n environmental helping to secu	ring sufficient wan pensatory site of the transition dispersion the competitive or the transition dispersion of the competitive or the transition dispersion or the competitive or the transition of the competitive or the transition of the competitive or the transition of the competitive or transition or transi	f a suitable size rategic approac to a circular ec), this proposed h to managing conomy (5) help	South		•	•

							SA	FRAMEWOR	RK OBJECTI\	/ES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)	ENVIRONM	ENTAL QUAL	_ITY	(D)	COMMUNIT	Y WELL-BE	ING
		new & existing waste sites to make the mosefficient use of	RECOVERY To drive waste management up the waste hierarchy.	ECONOMY To promote a	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	ADAPTATION To ensure that all waste management facilities are fully adapted to	FLOOD RISK 8 SuDS To avoid, reduce and manage flood risk to or from waste management	SUST. DESIGN To promote the highest standards of sustainable design and construction.	TRANSPORT To reduce trips, traffic	To minimise air	MENTAL PROTECTION To minimise the adverse impacts during	enhance biodiversity & habitats	EMPLOYMENT To promote employment, & competitiveness of the	AND VISUAL AMENITY To minimise adverse impacts on townscape quality and	QUALITY OF LIFE To minimise adverse on human health and	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 20 (Post EiP) Policy WP3 – page 30 "WP3 Existing Waste Sites Safeguarding Compensatory Provision (c) Compensatory provision for the loss of an existing safeguarded waste site will be required with the level of compensatory provision necessary to be considered on a case-by case basis at least meeting the equivalent of maximum achievable throughput of the site being lost. The list of safeguarded sites will be updated with any compensatory sites in the Sutton Waste AMR and the compensatory sites will be safeguarded for waste uses only. (d) Compensatory provision for the loss of a waste site from outside the South London Waste Plan area will not normally be permitted, unless there is robust evidence that: (i) the compensatory provision is required for London to manage its waste sustainably and achieve net self-sufficiency; and (ii) there are no available or suitable sites within the borough or waste planning area where the waste site will be lost; and (iii) existing safeguarded sites within the South London Waste Plan area are not available or suitable or that needs cannot be met through the adaption or intensification of existing facilities; and (iv) it would manage waste as high up the waste hierarchy as practicable; and (v) it would accord with all relevant aims and policies of the South London Waste Plan (particularly the locational criteria set out in Policy WP4 (b) to (e)) and the applicable borough's Development Plan.	++	+++	+++	++					++	++	++			+	+	+

				<u></u>			SA	FRAMEWOI	RK OBJECTI	VES						
	(A) SUS	(A) SUSTAINABLE WASTE MANAGEMENT (B) CLIMATE CHANGE							(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	To provide sufficient sites & waste facilities for al waste streams making up the			ECONOMY To promote a transition to a circular economy within	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	ADAPTATION To ensure that all waste management facilities are	SuDS To avoid, reduce and manage flood risk to or fron waste management		(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	AIR QUALITY To minimise air pollution and	MENTAL PROTECTION To minimise the adverse impacts during	SITY AND HABITATS To protect and enhance	(13) ECONOMY & EMPLOYMENT To promote	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and	(15)	(16) EQUALITIES, SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 20 (continued) Safeguarding Waste Hierarchy (e) Applications for non-waste uses on safeguarded waste sites that accord with all relevant aims and policies of the South London Waste Plan and the applicable borough's Development Plan, would be supported subject to appropriate conditions or legal agreements that ensure continued operational capacity. (f) Any development on an existing safeguarded waste site, including for compensatory provision, will be required to result in waste being managed at least to the same level in the waste hierarchy"	++	+++	+++	++					++	++	++			+	+	+
NOTES • Purpose: To ensure the policy is consistent with national policy an is justified and positively prepared. • Previously Mod 1.9 (part)	COMMENTARY By ensuring that compensatory provision for the loss of an existing safeguarded site will at least meet the equivalent of maximum achievable throughput of the site being lost and by discouraging compensatory provision the loss of a waste site from outside the plan area. this proposed modification is expected to have: • LARGE BENEFICIAL IMPACTS (+++) for (2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings (3) Promoting waste re-use, recycling and recovery in South Londo • MEDIUM BENEFICIAL IMPACTS (+++) for (1) Promoting net self-sufficiency within South London (4) helping to secure the transition to a circular economy (9) helping to deliver sustainable transport objectives with the planea (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities • SMALL BENEFICIAL IMPACTS (+) for (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) Helping to minimise potentially adverse effects on human hea and the open environment; and(16) helping to promote equalities, accessibility and social inclusion within South London															outh London with the pla
WP4 SITES FOR COMPEN MODIFICATION 21 (Post EiP) Para 5.28 – page 31 Amend paragraph as follows: "As set out in Policy WP, the The SLWP expects no new sites for waste except where required for compensatory provision (or new sites meeting the exceptional circumstances, set out in WPAE 1 and WP2). The location must be carefully considered."	No significant impacts – For clarity															

PAGE 36

							SA	FRAMEWOR	RK OBJECTIV	/ES						
	(A) SUS	STAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)	ENVIRONM	ENTAL QUAL	LITY	(D)	COMMUNIT	Y WELL-BE	ING
	SUFFICIENCY To provide sufficient sites & waste facilities for al waste streams making up the	STRATEGY To optimise	RECOVERY To drive waste management up the waste hierarchy.	ECONOMY To promote a	MITIGATION To address the causes of climate change by minimising CO ₂ emissions	To ensure that all waste management facilities are fully adapted to	SuDS To avoid, reduce and manage flood risk to or from waste management	SUST. DESIGN To promote the highest standards of sustainable design and	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste - related HGV movements	To minimise air	MENTAL	SITY AND HABITATS To protect and enhance biodiversity &	EMPLOYMENT To promote employment, & competitiveness of the waste sector in	AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 24 Policy WP4 parts (f) and (h) – page 31 Amend as follows: "(f) result in waste being managed at least to the same level in the waste hierarchy as the site being lost. (f) (h) Meet the other policies of the relevant borough's Development Plan."	++	++	+++	+++	++				++	++	+		+++	+	+	+
NOTES • Purpose: To ensure consistency with London Plan policy; • in response to Inspector's Question M2(i); and • Previously Mods 1.13 MODIFICATION 25	 LARGE London MEDIUN and add SMALL 	BENEFICIAL I 's economy a M BENEFICIAL dress the caus BENEFICIAL I	MPACTS (++) nd the competi IMPACTS in to ses of climate of MPACTS for (1	for (3) Promot tiveness of the erms of (1) Pro change (9) help 1) minimising	ing waste re-u waste sector moting net se ping to deliver impacts from o	It in waste bein se, recycling an If-sufficiency (2 sustainable tra construction an 15) minimising	nd recovery water promoting a nsport object doperation o	vithin South Lo an environmen ives with the p f waste facilitie	ndon (4) help ntally sustaina plan area; and es (12) helping	ng to secure the ple strategic ap (10) helping to protect and	pproach to man o minimise air d enhance biod	o a circular econ maging South L pollution and diversity and h	onomy; and (13 ondon's waste potential impac abitats (14) m	3) promoting leading (5) n cts on sensitive inimising adve	ocal employn ninimising CC e land-uses; erse impacts	nent, South O2 emissions and on the quality
Policy WP4 – page 31 Consolidated changes to Policy WP4 for reference: (see above)						See respect	ive appraisa	l outcomes fo	or Modificatio	ns 22, 23 and	d 24 above					
WP5 PROTECTING AND E	NHANCIN	G AMENI	ΓY	ı									ı			1
MODIFICATION 26 Policy WP5 part (a) – page 33 (a) Developments for compensatory or intensified waste facilities should contribute positively to the character and quality of the area and ensure that any potential adverse impacts of the development are designed and managed to mitigate any achieve levels that will not significantly adversely affect are appropriately mitigated					+	++	+	++	+	+	+	++		+++	+++	+++
mitigated. NOTES	COMMENTAR	I RY														
	By including LARGE health a MEDIUN sustaina SMALL	a furtherrequ BENEFICIAL 1 and the open M BENEFICIAI able design a BENEFICIAL 1	MPACTS (+++ environment; a IMPACTS (++ nd construction MPACTS (+) for) for (14) mini and(16) helpin) for (6) helpin in new or upg or (5) h elping t	mising adverse g to promote eng to ensure the graded waste for o minimise CO	y or intensified e impacts on the equalities, acce nat all new or u acilities; and (1 e emissions an Helping to mini	e quality of t ssibility and s pgraded wast .2) helping to d address the	ownscape and ocial inclusion to management protect and electorists.	visual amenit within South t facilities are nhance biodivenate change	y and the histo London. adapted to the ersity and habit 7) helping to av	ric environmente future impactats. /oid, reduce ar	nt (15) Helping ts of climate ch nd manage floo	to minimise p nange (8) help od risk to and f	ootentially adve ing to promote from waste de	erse effects of the highest velopments (on human standards of (9) helping to

							SA	FRAMEWOR	RK OBJECTI	/ES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)	ENVIRONM	ENTAL QUAI	_ITY	(D)	COMMUNIT	Y WELL-BE	ING
	SUFFICIENCY To provide sufficient sites	STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use of	up the waste hierarchy.	ECONOMY To promote a transition to a circular economy within	causes of climate change by minimising CO ₂ emissions	ADAPTATION To ensure that all waste management facilities are fully adapted to	SuDS To avoid, reduce and manage flood risk to or from waste management	sustainable design and	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on	MENTAL		EMPLOYMENT To promote employment, & competitiveness of the waste sector in	AND VISUAL AMENITY To minimise adverse impacts on townscape quality and	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 27 WP5 pts (c)(iii) & (c)(iv) p33 "Policy WP5 (c) (iii) Archaeological sites, the historic environment and sensitive receptors, such as schools, hospitals, and residential areas. Heritage Assets and the need to conserve, and where practicable, enhance those elements which contribute to their significance, including their setting; (iv) sensitive receptors, such as schools, hospitals and residential areas;"											++			+++	++	++
 NOTES Purpose: To ensure consistency with national policy; in response to Inspector's Question M4(i) 5; and Previously Mods 1.15 	assessed as LARGE MEDIUM	 ning Policy W having: BENEFICIAL I 1 BENEFICIAI	IMPACTS (+++ _ IMPACTS (++) for (14) mini) for (11) mini	mising advers mising the ad	particular regar e impacts on th verse impacts a ssibility and soo	e quality of t orising from the	ownscape and ne construction	visual amenit and operatio	y and the histo	ric environme	nt; and	J	, , ,		

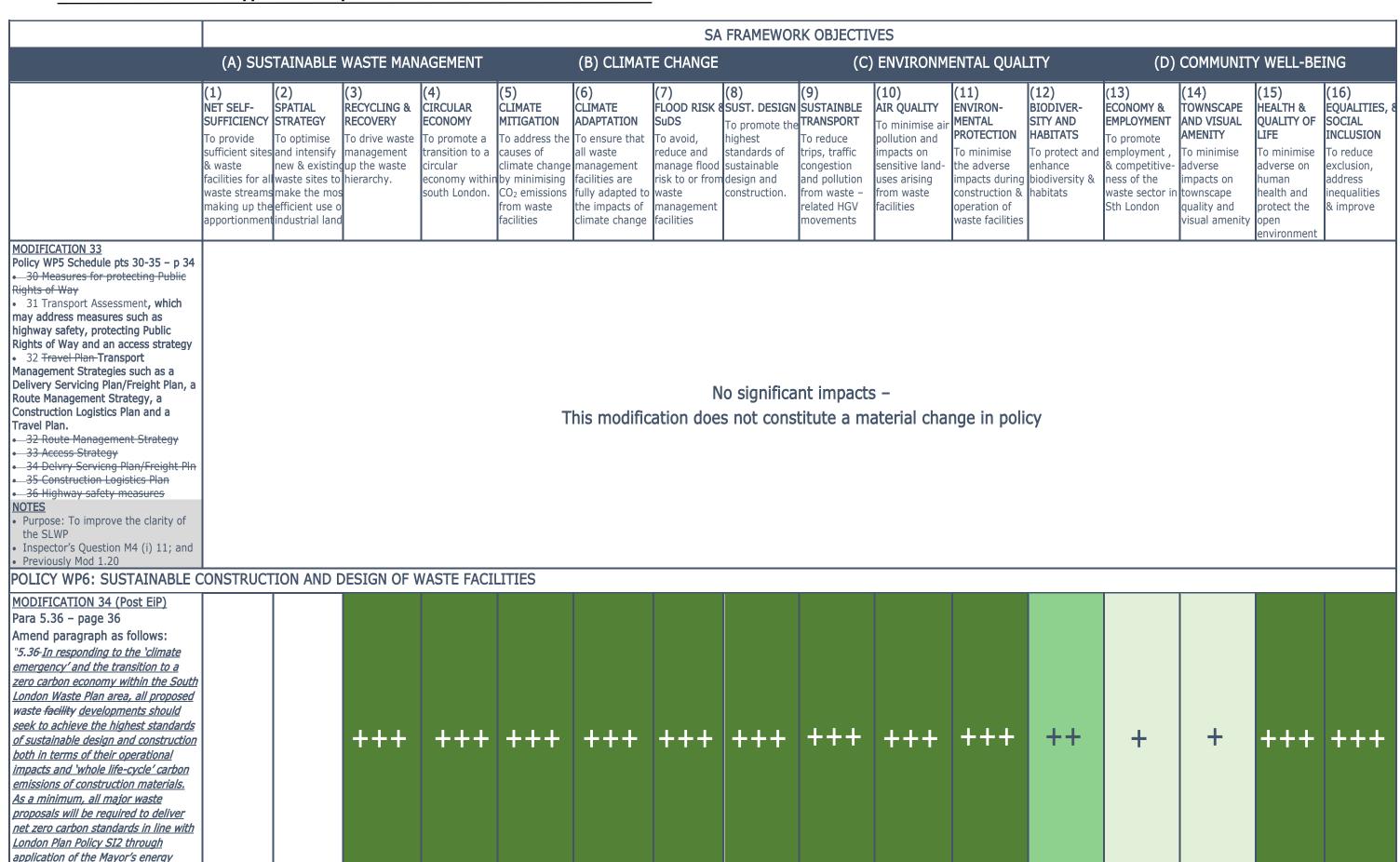
							SA	FRAMEWOR	RK OBJECTI	VES						
	(A) SUS	STAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)) ENVIRONM	ENTAL QUAL	.ITY	(D)	COMMUNIT	Y WELL-BE	ING
	SUFFICIENCY To provide sufficient sites & waste facilities for al waste streams making up the	STRATEGY To optimise	up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy withir south London.	causes of climate change by minimising	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	SuDS To avoid, reduce and manage flood risk to or from waste management	SUST. DESIGN To promote the highest standards of sustainable design and	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive landuses arising from waste facilities	MENTAL PROTECTION To minimise the adverse impacts during	enhance	EMPLOYMENT To promote employment,	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 28 Policy WP5 part (c)(v) – page 33 Amend as follows: "Policy WP5 (c) (v) Air emissions, including dust, arising from the on site operations, plant and traffic generated; (c) (v) Air quality and polluting emissions, including dust, from approved construction works, on-site waste operations and associated vehicle movements in the locality of new or intensified waste sites, taking account of national air quality objectives and current exceedances; potential impacts within Air Quality Focus Areas. Air Quality Management Areas and/or the Mayor's expanded Ultra Low Emission Zone (ULEZ); cumulative impacts with other waste sites; the London Plan requirement for development proposals to be at least 'Air Quality Neutral'; and the use of design solutions to prevent or minimise increased exposure of people and in particular vulnerable individuals to poor air quality."		++		+++	++				+++	+++	+++	++			+++	+++
NOTES • Purpose: To improve clarity over air quality requirements and ensure consistency with national policy; • Previously Mods 1.16	ULEZ; cumul LARGE potentia open er	details of the lative impacts BENEFICIAL lation impacts on impacts on invironment; and BENEFICIAL	s with other wa MPACTS (+++ sensitive land- and (16) helpin IMPACTS (++	ste sites and t) for (4) helpinuses (11) min g to promote 6) for (2) Pron	ne London Plar ng to secure th imising the ad equalities, acce noting an envir	must be taken requirement for the transition to verse impacts a essibility and so conmentally sus	or 'Air Quality a circular eco arising from the ocial inclusion stainable strate	Neutrality', tl nomy (9) help ne construction within South L	his proposed r ping to deliver n and operation London.	modification is a sustainable train of waste faci	assessed as ha nsport objectiv lities (15) Help	ving: /es with the pl ving to minimis	an area (10) F se potentially a	lelping to mini adverse effects	mise air poll s on human h	ution and nealth and th

climate change; and (12) helping to protect and enhance biodiversity and habitats.

							SA	FRAMEWOR	RK OBJECTI	VES						
	(A) SUS	STAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C) ENVIRONM	ENTAL QUAI	LITY	(D)	COMMUNIT	Y WELL-BE	ING
	& waste facilities for al waste streams making up the	To optimise and intensify	RECOVERY To drive waste management gup the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO ₂ emissions	To ensure that all waste management facilities are fully adapted to	SuDS To avoid, reduce and manage flood risk to or from waste management	sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste - related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land- uses arising from waste facilities	(11) ENVIRON- MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	enhance biodiversity & habitats	EMPLOYMENT To promote employment, & competitiveness of the	impacts on townscape quality and	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 29 Policy WP5 (vii), (viii) & (ix) – p 33 (vii) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network and the possibility of using sustainable modes of transport for incoming and outgoing materials; (viii) opportunities to minimise 'waste miles' and the potential of using sustainable modes of transport for incoming and outgoing materials (viii) (ix) The safety and security of the site."					+				+++	+++	++			+++	+++	+++
	ULEZ; cumu LARGE adverse promot MEDIU	lative impacts BENEFICIAL I e impacts on the e equalities, a M BENEFICIAL	s with other wa IMPACTS (+++ the quality of to accessibility and	ste sites and t) for (9) helpi ownscape and d social inclusi) for (11) min	he London Plan ng to deliver so visual amenity on within Sout imising the ad	n requirement f ustainable trans r and the histor h London verse impacts a	for 'Air Quality sport objective ic environment arising from the	Neutrality', th es with the plant (15) Helping	nis proposed r n area (10) H g to minimise n and operation	aste developme modification is a delping to minin potentially adve on of waste faci	assessed as ha nise air polluti e erse effects on	oving: on and potenti	al impacts on s	sensitive land-	·uses (14) mi	nimising
MODIFICATION 30 Policy WP5 final sentence – p 33 Amend as follows: "The information in the schedule below will provide the basis for the assessment of the impact of a development and should therefore be considered as part of any preapplication engagement."					+++	+++	+++	+++	+++	+++	+++	+++		+++	+++	+++
	assessed as LARGE future i upgrad impacts	ENTARY uring that all supporting information referred to in the Schedule attached tom Policy WP5 is considered at an early stage in the design process through pre-application engagement, this proposed modification is ed as having: ARGE BENEFICIAL IMPACTS (++) for (5) helping to minimise CO ₂ emissions and address the causes of climate change (6) helping to ensure that all new or upgraded waste management facilities are adapted to the uture impacts of climate change (7) helping to avoid, reduce and manage flood risk to and from waste developments (8) helping to promote the highest standards of sustainable design and construction in new or pgraded waste facilities (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities (12) helping to protect and enhance biodiversity and habitats (14) minimising adverse impacts on the quality of townscape and visual amenity and helping to minimise potentially adverse effects on human health and the open environment; and (16) helping to promote equalities, accessibility and social inclusion within South London													pted to the n new or verse l amenity and	
MODIFICATION 31 Policy WP5 – p33 Consolidated changes to WP5						See respective	ve appraisal	outcomes for	Modification	ns 26, 27, 28	and 29 above					

							SA	FRAMEWOR	RK OBJECTI	VES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)) ENVIRONM	ENTAL QUAI	_ITY	(D)	COMMUNIT	Y WELL-BE	ING
	SUFFICIENCY To provide sufficient sites	STRATEGY To optimise and intensify new & existing waste sites to make the mosefficient use of	RECOVERY To drive waste management up the waste	ECONOMY To promote a transition to a circular	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	ADAPTATION To ensure that all waste management	SuDS To avoid, reduce and manage flood risk to or from waste management		SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive landuses arising from waste facilities	MENTAL PROTECTION To minimise	HABITATS To protect and enhance biodiversity &		(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity		(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 32 Policy WP5 Schedule part 22 – page 34 22. Air Quality *Impact* Assessment, demonstrating setting out* the effects on air quality in the locality of the proposed development site arising from approved construction works, on-site waste operations and associated vehicle movements. the operation of the site and vehicles movement to and from it. In line with London Plan Polic SI 1 on *Improving Air Quality* and the relevant Local Plan policies, Air Quality Assessments must demonstrate that proposed developments: • are at least 'Air Quality Neutral' having regard to the latest available Mayoral guidance on neutral and air quality positiv approaches; promote opportunities to deliver further improvements to air quality and do not conflict with ongoing London-wide or borough level activities aimed at reducing air pollution • do not lead to further deterioration of existing poor air quality; create any new areas that exceed air quality limits; delay the date at which compliance will be achieved in areas that are currently in exceedance of national air quality; objectives; or create an unacceptable risk of high exposure to poor air quality; have assessed the cumulative impacts of multiple air pollution sources from the net development, for example, the on-site waste operations and associated vehicle movements, in combination with similar a pollution impacts from approved and proposed development, as advised by the council's Air Quality Officer; • incorporate design solutions to prevent or minimise increased exposure of people particularly vulnerable to poor air quality, including, but not limited to, children, people in poor health and the elderly; and incorporate proposed arrangements for post implementation monitoring and annual reporting of local air quality and		++		+++	++				+++	+++	+++	++			+++	+++
• Purpose: To improve clarity over air quality requirements, ensure	national air q local air quali • LARGE I the cons • MEDIUM	further detail uality objectiity and polluti BENEFICIAL Istruction and BENEFICIAL I	ves, incorporating emissions, MPACTS (++) operation of w. IMPACTS (+)	ting design sol this proposed for (9) helping aste facilities for (2) Promot	utions to preve modification is to deliver sus (15) Helping to ing an environ		exposure for aving: ort objective: erse effects o inable strate;	vulnerable gross (10) minimis n human healt	oups; and the ing air pollution in and the ope	need to-incorp on and potentia on environment	orate arranger I impacts on se ; and (16) help	ments for post ensitive land-u ping to promot	implementationses (11) minir de equalities, a	n monitoring a nising the adveccessibility and	and annual re erse impacts d social inclus	eporting of arising from sion.

hierarchy: (continued overleaf)



							SA	FRAMEWOI	RK OBJECTI	VES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)) ENVIRONM	ENTAL QUAL	_ITY	(D)	COMMUNIT	Y WELL-BE	ING
	SUFFICIENCY To provide sufficient sites & waste facilities for al	STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use o	RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	ECONOMY To promote a transition to a circular	MITIGATION To address the causes of climate change by minimising CO ₂ emissions	ADAPTATION To ensure that all waste management facilities are	SuDS To avoid, reduce and manage flood risk to or from waste management		TRANSPORT To reduce trips, traffic	(10) AIR QUALITY To minimise air pollution and impacts on sensitive landuses arising from waste facilities		enhance biodiversity &	(13) ECONOMY & EMPLOYMENT To promote employment , & competitive- ness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	QUALITY OF LIFE To minimise adverse on human health and protect the	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
(i) be lean: use less energy and manage demand during operation (ii) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly (iii) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site (iv) be seen: monitor, verify and report on energy performance. A minimum 35% reduction beyond Part L 2013 must be achieved on site for both major and minor proposals. Any shortfall in emissions reductions must then be addressed through a financial contribution to the relevant borough's carbon offset fund." A well-designed and managed waste facility should be designed to be sustainable both in construction and future operation. "Designing Waste Facilities — A Guide to Modern Design in Waste" (DEFRA, 2008) states: "There are two aspects of climate change that need to be considered by prospective developers of new waste facilities. First, how will the proposals impact upon the process of climate change through carbon emissions? Second, how will the development be affected as a consequence of the effects of climate change?" In addition, Policy \$12 of the 2020 London Plan provides guidance on how to minimise greenhouse gas emissions and Policy GG6 seeks to ensure that sites are adapted to be resilient against the effects of climate change			+++	+++	+++	+++	+++	+++	+++	+++	+++	++	+	+	+++	+++
NOTES Post Examination Modification; Purpose: To improve clarity and ensure consistency with London Plan policy	• LARGE BE address th and from area (10) adverse e • MEDIUM E • SMALL BE	that waste de diffication is en causes of community waste developments on hum BENEFICIAL IN the causes of the caus	expected to have PACTS (+++) climate change pments (8) he nimise air pollulan health and MPACTS (++) PACTS (13) pro	ve:. for (3) Promo (6) helping to lping to promo ution and poter the open envir for (12) helpin	oting waste re ensure that al te the highest atial impacts or conment; and g to protect ar	of sustainable of suse, recycling I new or upgrade standards of some sensitive land (16) helping to ad enhance biodouth London's of the sustainable of the sustainabl	and recovery ded waste ma ustainable de -uses (11) mi promote equ liversity and	y within South anagement fac- sign and cons inimising the a alities, access habitats	London (4) h cilities are adap struction in new adverse impact ibility and socia	nelping to secu pted to the futu w or upgraded s arising from t al inclusion wit	re the transition ure impacts of waste facilities the construction hin South Lond	on to a circular climate change s (9) helping to n and operatio lon.	r economy (5) e (7) helping to deliver susta n of waste faci	helping to monopological networks avoid, reduce inable transpolities (15) Help	inimise CO ₂ e e and manage rt objectives bing to minim	emissions and e flood risk to with the plan se potentially

							SA	FRAMEWOR	RK OBJECTI\	/ES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)	ENVIRONM	ENTAL QUAL	ITY	(D)	COMMUNIT	Y WELL-BE	ING
	(1) NET SELF- SUFFICIENCY To provide sufficient sites & waste facilities for al waste streams making up the apportionment	STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use o	RECOVERY To drive waste management up the waste hierarchy.	ECONOMY To promote a	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	ADAPTATION To ensure that all waste	FLOOD RISK 8 SuDS To avoid, reduce and manage flood risk to or from waste management	SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on	MENTAL	SITY AND HABITATS To protect and enhance biodiversity & habitats	EMPLOYMENT To promote employment, & competitiveness of the	AND VISUAL AMENITY To minimise adverse impacts on townscape quality and	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 35 Para 5.38 – page 36 Insert new paragraph after 5.38 "Developers will have to provide justified costs for their proposals to demonstrate why the 'Excellent' rating would make their proposal unviable. The details of the costs to be provided should ideally be agreed with the relevant local authority as part of pre-application engagement." NOTES • Purpose: To improve the clarity of the SLWP;		d modification	n is assessed a		++	issions and ad	dressing the o	auses of clima	ate change (10	++	++	ution and pote	ential impacts	on sensitive la	++	minimising
MODIFICATION 36 (Post EiP) Para 5.39 – page 36 Amend as follows: "As well as addressing the causes of climate change, waste proposals must be fully adapted to the future impacts of climate change through the following measures: Heating, Cooling and Energy Use Overheating and cooling. Addressing summer overheating and the urban heat island (UHI) effect by incorporating green infrastructure as part of the design and layout in line with the Mayor's minimum 'urban greening factor' standards in London Plan Policy G6 (or the equivalent standards set out at borough level). "Developers should also consider climate change adaptation measures in schemes. "Designing Waste Facilities — A Guide to Modern Design in Waste" also highlights a number of climate change impacts on waste facilities which should also be considered. These comprise.	adverse	impacts aris	ing from the co	instruction and	d operation of v	+++	+++	minimise pot	tentially adver	++	uman health a	++	nvironment;	+	+++	+++

							SA	FRAMEWOR	RK OBJECTI\	/ES						
	(A) SUS	TAINABLE '	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)	ENVIRONM	ENTAL QUAI	_ITY	(D)	COMMUNIT	Y WELL-BE	ING
•		STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use of	RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy withir south London.	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	ADAPTATION To ensure that all waste management facilities are fully adapted to	SuDS To avoid, reduce and manage flood risk to or from waste management	highest standards of sustainable	TRANSPORT To reduce trips, traffic	(10) AIR QUALITY To minimise air pollution and impacts on sensitive landuses arising from waste facilities	(11) ENVIRON- MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	SITY AND HABITATS To protect and enhance biodiversity &	(13) ECONOMY & EMPLOYMENT To promote employment , & competitive- ness of the waste sector in Sth London	quality and	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
 MODIFICATION 36 (continued) Flood Risk. Dealing with the increased frequency and severity of storm events resulting from climate change by incorporating sustainable urban design (SuDS) measures such as filter strips, permeable paving soakaways and green roofs as part of the design and layout. All waste proposals must achieve greenfield run off rates and volumes in the 1 in 100 year storm event plus climate change in line with part B of London Plan Policy SI 13; Flood Readiness. Flood mitigation measures proposed should be designed to consider the risk both to and from the development over its planned lifetime. Facilities should have a drainage system to cope with more frequent high levels of rainfall. This system should include Sustainable Drainage Systems (SuDS), green roofs and walls, soakaways and permeable pavements and parking areas. Odours. Dealing with odour issues which are exacerbated with higher temperatures by avoiding the use of unenclosed waste facilities will become particularly vulnerable to odour issues." 						+++	+++	+++		++	+++	++		+	+++	+++
	proposed mo LARGE BEI risk to and construction within Sou MEDIUM B	that waste dedification is experienced waste on and operation to the condon.	expected to have PACTS (+++) for developments also from of waste for MPACTS (++) from the page of the	ve:. for (6) helping (8) helping to acilities (15) H for (10) Helpin	to ensure that promote the hi elping to minim g to minimise ang adverse imp	t all new or upgighest standard nise potentially air pollution an	graded waste Is of sustaina adverse effe d potential in	management ble design and cts on human npacts on sens	facilities are add construction health and the	dapted to the fin new or upgreponents open environments	uture impacts aded waste fac ment; and (16 ning to protect	of climate cha cilities (11) min helping to pro	nge (7) helpin nimising the ac omote equaliti	g to avoid, red dverse impacts es, accessibilit	duce and mar arising from	nage flood the

					SA	FRAMEWOR	RK OBJECTI	VES						
	(A) SUSTAINABLE	WASTE MANAGE	EMENT	(B) CLIMAT	E CHANGE		(C)) ENVIRONM	ENTAL QUAI	_ITY	(D)	COMMUNIT	Y WELL-BE	ING
	(1) NET SELF- SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment industrial land	RECOVERY To drive waste management circular the waste hierarchy.	CCLIMATE MITIGATION promote a nsition to a CLIMATE MITIGATION To address the causes of	To ensure that all waste management facilities are	FLOOD RISK 8 SuDS To avoid, reduce and manage flood risk to or from waste management	sustainable design and	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land- uses arising from waste facilities	(11) ENVIRON- MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities		EMPLOYMENT To promote employment, & competitiveness of the	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 37 Para 5.41 (now 5.42) – page 36 Amend as follows: "5.41 5.42 Therefore in accordance with national and regional advice, the 201921 ItP London Plan (including the Mayor of London's Sustainable Design and Construction SPG, 2014) and this plan's objectives:" NOTES • Purpose: To improve clarity and consistency with London Plan • Previously Mod.1.24			-	This modific		o significa s not cons	•		nge in poli	су				
MODIFICATION 38 Para 5.40 First Sentence – p37 Amend as follows: "In the construction phase of any development, consideration should be given to Construction, Demolition and Excavation Waste on-site as this is the most sustainable approach to dealing with this form of waste. It is also an opportunity to promote and contribute towards the London Plan target of 95% of excavation material going to beneficial use and 95% of construction and demolition waste being reused, recycled or recovered." NOTES • Purpose: To improve clarity and to ensure SLWP is consistent with the London Plan and NPPF • Previously Mod.1.26			This mo	odification is		o significa nd does no	•		rial change	e in policy				

							SA	FRAMEWOR	RK OBJECTI\	/ES						
	(A) SUS	STAINABLE '	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)	ENVIRONM	ENTAL QUAI	_ITY	(D)	COMMUNIT	Y WELL-BE	ING
	To provide sufficient sites & waste facilities for al waste streams	STRATEGY To optimise and intensify new & existing waste sites to make the mose efficient use of	RECOVERY To drive waste management up the waste hierarchy.	ECONOMY To promote a transition to a circular economy within	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	ADAPTATION To ensure that all waste management facilities are fully adapted to	SuDS To avoid, reduce and manage flood risk to or from waste management	sustainable	TRANSPORT To reduce trips, traffic congestion and pollution from waste –	(10) AIR QUALITY To minimise air pollution and impacts on sensitive landuses arising from waste facilities	(11) ENVIRON- MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities		& competitive- ness of the	impacts on	QUALITY OF LIFE To minimise adverse on human health and protect the	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 39 Policy WP6 part (b) – page 37 (b) Waste facilities will be required to: (v) minimise waste and promote sustainable management of construction waste the beneficial use of excavation waste and the reuse, recycling or recovery of construction and demolition waste on site; and		+++	+++	+++	+++								+++			
 NOTES Purpose: To improve clarity and tensure the SLWP is consistent with the 2021 London Plan and NPPF Previously Mod.1.27 	• LARGE Promoti	d modification BENEFICIAL I ing waste re-u	MPACTS (++) use, recycling a	for (1) Promot Ind recovery w	ithin South Lo	fficiency within ndon (4) helpin ddress the cau	g to secure t	ne transition to	o a circular ec	onomy; and (1	3) promoting I	ocal employm	ent, South Lon	don's econom	y and the cor	npetitiveness

							SA	FRAMEWO	RK OBJECTI	VES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)) ENVIRONM	ENTAL QUAI	_ITY	(D)	COMMUNIT	Y WELL-BE	ING
	SUFFICIENCY To provide sufficient sites & waste facilities for al waste streams making up the apportionmen	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy withir south London.	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	SuDS To avoid, reduce and manage flood risk to or fron waste management		(9) I SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive landuses arising from waste facilities	MENTAL PROTECTION To minimise	HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment , & competitive- ness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	QUALITY OF LIFE To minimise adverse on human health and	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
POLICY WP7: THE BENEF	ITS OF W	ASTE										<u> </u>				
Para 5.44 last sentence – page 38 Amend as follows: "Therefore, the South London Waste Plan boroughs will not expect a proposal for such a facility to be submitted. Notwithstanding this, the Mayor's London Plan sets out a number of benefits from waste that should be encouraged when development proposals are brought forward. Therefore, in accordance with London Plan Policy SI 8 Part D, the South London Waste Plan Boroughs will support schemes that also propose additional benefits alongside waste operations."	+++	+++	+++	+++	+++			+++		++			+++		+	+
NOTES • Post Examination Modification	COMMENTAR By encourage		posals which d	leliver a range	of benefits for	the circular ec	onomy, redu	cing life-cvcle	carbon impact	s and other env	vironmental su	stainability ob	jectives, such	as delivering o	omplementar	y waste
Purpose: To improve clarity and ensure consistency with London Plan policy	managemen renewable/ e LARGE E Promotin helping waste se MEDIUM	t and seconda efficient energ BENEFICIAL II ng waste re-u to promote the ector I BENEFICIAL	ary material property generation, MPACTS (+++) use, recycling and highest standard (++)	ocessing facility this modificaty of the property of the prope	ies on a single ion is expected of the self-self in South Lor inable design a ing to minimise	site; support plot to have: ufficiency withindon (4) helpin and construction e air pollution a	orolonged pro n South Lond g to secure the n in new or u	duct life and s on (2) Promote transition to pgraded waste impacts on se	econdary repacting an environ of a circular econd facilities, and ansitive land-us	ir, refurbishme nmentally susta onomy (5) h elp I (13) promotin	nt and remanu inable strategi ing to minimis g local employ	of approach to e CO ₂ emission ment, South L	managing Souns and address	sets; and cont uth London's w s the causes of pmy and the co	ributinmg tow aste arisings) climate chan impetitivenes	(3) age (8) s of the

							SA	FRAMEWOR	RK OBJECTI	VES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)) ENVIRONM	ENTAL QUAL	.ITY	(D)	COMMUNIT	Y WELL-BE	ING
	To provide sufficient sites waste facilities for al waste streams making up the	SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the mose efficient use of industrial land	To drive waste management up the waste hierarchy.	ECONOMY To promote a	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	facilities are fully adapted to	FLOOD RISK 8 SuDS To avoid, reduce and manage flood risk to or from waste management	SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on	MENTAL	SITY AND HABITATS To protect and enhance biodiversity & habitats	EMPLOYMENT To promote employment, & competitiveness of the	AND VISUAL AMENITY To minimise adverse impacts on townscape quality and	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 41 (Post EiP) Policy WP7 – page 38 Amend as follows:															environment	
"WP7 The Benefits of Waste Waste development for the intensification of sites, which involve the reuse, refurbishment, remanufacture of products or the production of by-products, will be encouraged.																
Waste development for additional Energy from Waste facilities will not that can deliver additional benefits, as set out in London Plan Policy SI 8 Part D, Points 3 and 4, will be supported encouraged. Waste development for the intensification of sites should seek to result in sub-regional job creation and resulting social benefits, including skills, training, andapprenticeship	+++	+++	+++	+++	+++			+++		++			+++		+	+
• Post Examination Modification • Purpose: To improve clarity and ensure consistency with London Plan policy.	managemen renewable/ • LARGE E Promotii promotii	ing waste pro t and seconda efficient energ BENEFICIAL II ng waste re-ung the highes	ary material pr gy generation , MPACTS (+++) ise, recycling a t standards of	ocessing facilit this modificati) for (1) Promo nd recovery w sustainable de	ies on a single on is expected ting net self-s thin South Lor sign and const	site; support p I to have: ufficiency withindon (4) helpin	n South Londo g to secure th or upgraded v	duct life and se on (2) Promoti he transition to waste facilities	ing an environ a circular ecc , and (13) pro	s and other envir, refurbishme mentally susta nomy (5) helpi moting local er	nt and remanu inable strategiong to minimis	c approach to e CO ₂ emission	managing Souns and ass	ets; and conti th London's we the causes of	ributinmg tov aste arisings climate char	vards) (3) nge (8)

SMALL BENEFICIAL IMPACTS (+) for (15) Helping to minimise potentially adverse effects on human health and the open environment; and(16) promoting equalities, accessibility and social inclusion in South London.

							SA	FRAMEWOI	RK OBJECTI\	/ES						
	(A) SUS	STAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)	ENVIRONM	ENTAL QUAI	LITY	(D)	COMMUNIT	Y WELL-BE	ING
POLICY WP8:NEW DEVELO	waste streams making up the apportionmen	STRATEGY To optimise and intensify new & existing waste sites to make the mose efficient use of industrial land	RECOVERY To drive waste management up the waste hierarchy.	ECONOMY To promote a transition to a circular economy withir south London.	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	ADAPTATION To ensure that all waste management	SuDS To avoid, reduce and manage flood risk to or from waste management		TRANSPORT To reduce trips, traffic	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land- uses arising from waste facilities	(11) ENVIRON- MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities		(13) ECONOMY & EMPLOYMENT To promote employment , & competitive- ness of the waste sector in Sth London	impacts on	QUALITY OF LIFE To minimise adverse on human health and protect the	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 42	JPMLINI F	TILCIIII	G WASIL S	1112												
Policy WP8 - page 39 Amend as follows: "WP8 New Development Affecting Waste Sites																
New development should be designed to ensure that existing, consented or safeguarded waste sites and sites developed for compensatory provision remain viable and can intensify																
without unreasonable restrictions being placed on them. Where new development is proposed																
that may be affected by an existing, <u>consented or safeguarded</u> waste site, an extant scheme, a permission for																
additional capacity or a site developed for compensatory provision, the applicant should: (i) Ensure that good design mitigates and minimizes existing and potential nuisances generated by the waste use, either existing, extant, a permission for additional capacity or developed for compensatory provision; (ii) Explore mitigation measures early in the design stage, with the necessary and appropriate provisions, including the ongoingand future management of mitigation measures, secured through planning conditions and obligation;	++							++		+++	+++				+++	++
(iii) Engage early with the operator of the waste site to ensure a full understanding of the operation (including on-site activities and hours of operation) and to ensure baseline assessments are robust."																
NOTES Purpose: To improve clarity and consistency within the SLWP Previously Mod.2 (with minor changes)	(including on- • LARGE BEI waste facil • MEDIUM B	early engage site activities a NEFICIAL IMP lities (15) mir SENEFICIAL IN	ACTS (+++) formulation in the policy indicates the policy in the policy	ration) and to er or (10) minimi tential adverse or (1) promoti	rs in cases who nsure baseline as sing air pollutic e effects on hur ng net self-suff ualities, access	ssessments are r on and potentia man health aris ficiency within	robust, this probust, this problem impacts on sing from the South Londor	oposed modifi sensitive land operation of e	cation is asses -uses from exi existing waste.	sed as having: sting waste sit	es (11) minimi	ising the adve i	se impacts ar	ising from the	operation of	existing

				<u>-</u>			SA	FRAMEWOR	RK OBJECTI	VES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)) ENVIRONM	ENTAL QUAI	_ITY	(D)	COMMUNIT	Y WELL-BE	ING
	To provide sufficient sites & waste facilities for al waste streams making up the apportionmen	STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use o industrial land	RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy withir south London.	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	To ensure that all waste management facilities are fully adapted to	SuDS To avoid, reduce and manage flood risk to or from waste management	design and	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive landuses arising from waste facilities	(11) ENVIRON- MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	SITY AND HABITATS To protect and enhance biodiversity & habitats	EMPLOYMENT To promote employment, & competitiveness of the	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	QUALITY OF LIFE To minimise adverse on human health and protect the	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
POLICY WP9:PLANNING C)BLIGATI(ONS I		1						1						
Para 5.52 – page 40 Amend examples as follows: • "Transport Management Strategies, that include Delivery and Servicing Plans that incorporate measures to; manage traffic routes to the site Traffic management measures, including the routing of vehicles; supporting staff to travel sustainably; ensure improving road safety; reducing reduce freight traffic, particularly at peak times, facilitate a transition to low emission vehicles and a monitoring regime. • off site post implementation monitoring of emissions and reporting of impacts upon the water environment, particularly for new or intensified waste sites adjacent to main rivers or other watercourses • post implementation monitoring and annual reporting of local air quality and polluting emissions from both on-site waste operations and associated HGV movements in the vicinity of new or intensified waste sites against national air quality objectives and any relevant emissions limits set as part of the planning permission and/or waste license"					+	+	++	++	+++	+++	+++				+++	+++
 NOTES Purpose: To improve the clarity of the SLWP with regards to examples of planning obligations that could be sought. Previously Mod.1.28 	LARGE adverse accessilMEDIUMSMALL	d modification BENEFICIAL I e impacts aris bility and soci	ing from the co al inclusion wit IMPACTS for MPACTS for(5)	for (9) helping onstruction and thin South Lon (7) helping to	d operation of vidon. don. avoid, reduce a	tainable transp waste facilities and manage flo issions and add	((15) Helping ood risk to and	to minimise p	ootentially adv	erse effects on (8) promoting	human health	and the open andards of sust	environment; cainable design	and(16) helpi and construc	ng to promote	e equalities,

					SA	FRAMEWOR	K OBJECTI\	'ES						
(A) SUSTAIN	NABLE WASTE MAN	AGEMENT		(B) CLIMATI	E CHANGE		(C)	ENVIRONME	ENTAL QUAL	ITY	(D)	COMMUNIT	/ WELL-BE	ING
(1) (2) NET SELF- SPAT SUFFICIENCY STRA To provide To or		ECONOMY	MITIGATION		SuDS	(8) SUST. DESIGN To promote the highest	TRANSPORT	AIR QUALITY To minimise air	ENVIRON- MENTAL	BIODIVER- SITY AND	ECONOMY & EMPLOYMENT	AND VISUAL	HEALTH & QUALITY OF	(16) EQUALITIES, S SOCIAL INCLUSION
sufficient sites and i & waste new facilities for all waste	intensify management & existing up the waste te sites to hierarchy.	transition to a circular economy within	causes of climate change by minimising	all waste management facilities are	reduce and manage flood risk to or from	standards of sustainable design and	trips, traffic congestion and pollution	impacts on sensitive land- uses arising	the adverse impacts during	To protect and enhance biodiversity &	employment , & competitive- ness of the	adverse impacts on	adverse on human	To reduce exclusion, address
waste streams make making up the effici apportionment indus	cient use o		from waste	fully adapted to the impacts of climate change	management		from waste – related HGV movements	facilities	construction & operation of waste facilities			quality and visual amenity		inequalities & improve

POLICY WP9:PLANNING OBLIGATIONS

MODIFICATION 44 Policy WP9 – page 40

Amend as follows:

"Policy WP9 Planning Obligations
Planning obligations will be used to
ensure that all new Waste
development or waste redevelopment
must ensure that where these have
off-site impacts, these are addressed
to make the development acceptable
provide that these are mitigated
meets on and off site requirements
that are made necessary by, and are
directly related to, any proposed
development and are reasonably
related in scale and kind to the
development."

No significant impacts -

Clarification of the approach to planning obligations as set out in planning legislation and national policy

<u>NOTES</u>

Purpose: consistency with NPPFPreviously Mod.2.1

POLICY WP10 MONITORING AND CONTINGENCIES

MODIFICATION 45 Para 5.54- page 41

"The South London Waste Plan boroughs recognise that on-going plan monitoring and review are essential to:

- delivering objectives of the plan;
- assessing the implementation of the strategic policies;
- analysing the effectiveness of policies; and
- analysing waste planning permissions and compliance with planning conditions and obligations."

NOTES

 Purpose: To improve clarity around monitoring and to ensure consistency with national policy

Previously Mod.1.28a

COMMENTARY

By ensuring compliance with conditions, this proposed modification is assessed as having:

• LARGE BENEFICIAL IMPACTS (+++) for (5) helping to minimise CO₂ emissions and address the causes of climate change (6) helping to ensure that all new or upgraded waste management facilities are adapted to the future impacts of climate change (7) helping to avoid, reduce and manage flood risk to and from waste developments (8) helping to promote the highest standards of sustainable design and construction in new or upgraded waste facilities (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities (12) helping to protect and enhance biodiversity and habitats (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) Helping to minimise potentially adverse effects on human health and the open environment; and (16) helping to promote equalities, accessibility and social inclusion within South London

							SA	FRAMEWOR	RK OBJECTI\	/ES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)	ENVIRONM	ENTAL QUAL	.ITY	(D)	COMMUNIT	Y WELL-BE	ING
	SUFFICIENCY To provide sufficient sites	STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use o	RECOVERY To drive waste management up the waste hierarchy.	ECONOMY To promote a	MITIGATION To address the causes of climate change by minimising CO ₂ emissions	ADAPTATION To ensure that all waste management	SuDS To avoid, reduce and manage flood risk to or from waste management	sustainable design and	TRANSPORT To reduce trips, traffic congestion and pollution from waste –	To minimise air pollution and impacts on	MENTAL PROTECTION To minimise	SITY AND HABITATS To protect and enhance biodiversity & habitats	EMPLOYMENT To promote employment , & competitive- ness of the	AND VISUAL AMENITY To minimise adverse impacts on townscape quality and	QUALITY OF LIFE To minimise adverse on human health and	(16) EQUALITIES, SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 46 (Post EiP) After Para 5.57 – page 41 "The South London Waste Plan boroughs will engage with all relevant Duty to Cooperate stakeholders on an ongoing basis in a constructive, an active and an ongoing basis on any relevant strategic matters. A lead borough shall be nominated to carry out this responsibility as and when required."	++	++	++	++	+	+	+	+	+	++	+	+		+	+	+
NOTES • Purpose: To improve the clarity of the SLWP and to make clear the Plan's ongoing commitment to DtC	 bjectives, p LARGE E Promotin MEDIUM SMALL E adverse 	olicies and ta BENEFICIAL II ng waste re-u BENEFICIAL II impacts arisi	rgets are met, MPACTS (+++) ISE, recycling a IMPACTS (++) MPACTS (+) for ING from the co	this proposed) for (1) Promo nd recovery wi) for helping to r (5) helping to nstruction and	modificationvision of which is modification of the modification of which is modified by the modification of the modification o	Ill other relevants assessed as harmonic within the collection and population and	aving potenting South Londong the transitotential impact address the (12) helping t	ally: on (2) Promoti ion to a circula its on sensitive causes of clim o protect and	ing an environ ar economy an e land-uses ate change (9 enhance biodiv	mentally sustaind (10) Helping helping to deleversity and hab	inable strategion to minimise all liver sustainabuitats (14) min	c approach to ir pollution and le transport ob imising advers	managing Sou d potential imp ojectives with t e impacts on t	th London's wacts on sensithe plan area (he quality of t	aste arisings) ive land-uses 11) minimisii ownscape an	ng the
MODIFICATION 47 (Post EiP) Para 5.59 First Sentence – p41 Insert new paragraphs after 5.58 "In addition to monitoring the implementation of the Plan, it is equally important to ensure the performance of operational waste sites is monitored too. This is the responsibility of a number of parties, namely: The South London Waste Plan Boroughs, the Environment Agency and waste site operators. The waste operator is responsible for ensuring that its regulated facility does not cause pollution of the environment and harm to human health. The operator's performance in relation to that responsibility is assessed by checking compliance with the terms and conditions of the permit. "Environmental permits are issued by either the Environment Agency for large-scale facilities and those with greater risk to the environment (known as "A1 installations") or the local authority for smaller-scale facilities with lower risk to the environment (which include "A2 installations" and "Part B installations"). The responsibility for checking compliance falls to the issuer of the permit (the regulator).					+	+	+	+	+++	+++	+++	+		+		

							SA	FRAMEWOR	RK OBJECTI	VES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)) ENVIRONM	ENTAL QUA	LITY	(D)	COMMUNIT	Y WELL-BE	ING
		STRATEGY To optimise and intensify new & existing waste sites to make the mosefficient use o	RECOVERY To drive waste management up the waste hierarchy.	ECONOMY To promote a transition to a circular	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	ADAPTATION To ensure that all waste management facilities are fully adapted to	SuDS To avoid, reduce and manage flood risk to or from waste management		SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive landuses arising from waste facilities	PROTECTION To minimise the adverse	SITY AND HABITATS To protect and enhance biodiversity & habitats	EMPLOYMENT To promote employment,	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity		(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 47 (continued)Regulations are the basis for any enforcement action and the principal offences are: • operating [without] a permit; • causing or knowingly permitting a water discharge activity or groundwater activity without a permit; • The Environmental Permitting failing to comply with a permit condition, flood risk activity emergency works notice, flood risk remediation notice or an enforcement-related notice. Operator competence can be considered by the regulator at any time, whether as part of the determination of an application or at any time during the life of the permit. The regulator can suspend or revoke the permit if an operator fails to comply with the conditions of the permit, risking harm to the environment or human health. The SLWP Boroughs will monitor any enforcement action taken against waste operators to ensure that existing waste facilities do not cause harm to the environment or local communities. This will be published as part of the Waste AMR. Any additional information on enforcement action can be requested from the regulator. In addition, planning legislation gives powers to local authorities to take enforcement action where development has been carried out, either: without planning permission, and / or consent; where a condition on a planning permission has not been met; and where a planning obligation has not be delivered. As such, the South London Waste Boroughs' individual Planning Enforcement teams will investigate alleged planning breaches related to waste developments within their respective boroughs. When considering what action to take, if necessary, the Boroughs will have regard to national planning policy and guidance, and any relevant legislation.					+	+	+	+	+++	+++	+++	+		+	+++	+++
NOTES Post Examination Modification Purpose: To improve clarity of the SLWP with regards to the differen stakeholders involved in monitoring and what their roles are	permitting co LARGE BE adverse ir inclusion v SMALL BE	the respective the respective that the respect	proposed mod PACTS (+++) g from the cons London. PACTS (+) for (ification is exp for (9) helping struction and o 5) helping to r	ected to have: to deliver susperation of was	ughs, the EA a stainable trans ste facilities (15 missions and ac nd habitats, and	oort objective in minimising ddress the ca	es with the pla potentially ad uses of climate	n area (10) H verse effects on e change (8) h	lelping to minir on human heal t	mise air pollut th and the ope ote the highes	ion and potent n environment t standards of s	ial impacts on ; and (16) pro sustainable de	sensitive land moting equalit sign and const	-uses (11) m	ninimising the

							SA	FRAMEWOR	RK OBJECTI	VES						
	(A) SUS	STAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)	ENVIRONM	ENTAL QUAI	_ITY	(D)	COMMUNIT	Y WELL-BE	ING
	To provide sufficient sites waste facilities for al waste streams making up the	STRATEGY To optimise	hierarchy.	ECONOMY To promote a	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	ADAPTATION To ensure that all waste management facilities are fully adapted to	SuDS To avoid, reduce and manage flood risk to or from waste management		SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements		(11) ENVIRON- MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	habitats		(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIESOCIAL INCLUSION To reduce exclusion, address inequalities & improve
Industrial Notes and the boroughs, in consultation with each other and with other elevant Duty to Cooperate bodies appropriate, such as the GLA, WARB, EA, the South London Waste Plan in the borough of Sutton's Authority Monitoring and Contingency Table and the boroughs, in consultation with each other and with other elevant Duty to Cooperate bodies appropriate, such as the GLA, WARB, EA, the South London Waste Partnership and the monitoring and the in such as the GLA, whether it is necessary to an	+++	+++	+++	+++					+++	+++	+++		+++			
OTES Purpose: To improve the clarity of the SLWP with regards to those stakeholders likely to be engaged in DtC and contribute towards the monitoring of the Plan Previously Mod 2.2	objectives, p • LARGE Promot	that the SLW policies and ta BENEFICIAL I ing waste re-	rgets are met, MPACTS (++) use, recycling	this proposed for (1) Promot and recovery w	modificationis ing net self-su vithin South Lo	all other relevar assessed as ha afficiency within ndon (4) helpir uses (11) min	iving: South Londong to secure t	on (2) Promotir he transition to	ng an environr o a circular ec	nentally sustai onomy; for (9)	nable strategion	approach to i	managing Sout le transport ob	th London's wa Djectives with t	ste arisings) he plan area	(3) (10) Helpi

London's economy and the competitiveness of the waste sector.

time of the hearings.

							SA	FRAMEWOR	RK OBJECTIV	VES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)) ENVIRONM	ENTAL QUAI	LITY	(D)	COMMUNIT	Y WELL-BE	ING
	SUFFICIENCY To provide sufficient sites & waste	STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use o		(4) CIRCULAR ECONOMY To promote a transition to a circular economy withir south London.	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	ADAPTATION To ensure that all waste management facilities are fully adapted to	SuDS To avoid, reduce and manage flood risk to or from waste management		(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive landuses arising from waste facilities	MENTAL PROTECTION To minimise the adverse			(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATIONS 51, 53-56, 59, 62, 65-69, 72, 75-79, 84, 89-90, 98, 101-102, 104, 108, 110-111, 113 and 117 Amend 'Issue to Consider' as follows: "Protecting the residential amenity Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts." MODIFICATION 51 Site C4 - page 45 MODIFICATION 53 Site C5A - page 46 MODIFICATION 54 Site C5b - page 47 MODIFICATION 55 Site C6 - page 48 MODIFICATION 55 Site C6 - page 48 MODIFICATION 59 Site C7 - page 51 MODIFICATION 65 Site C10 - page 51 MODIFICATION 65 Site C12 - page 4 MODIFICATION 65 Site C12 - page 4 MODIFICATION 66 Site C13 - page 55 MODIFICATION 67 Site K2 - page 57 MODIFICATION 68 Site K3 - page 58 MODIFICATION 70 Site K4 - page 61 MODIFICATION 71 Site M4 - page 61 MODIFICATION 72 Site M4 - page 63 MODIFICATION 73 Site M3 - page 63 MODIFICATION 74 Site M4 - page 64 MODIFICATION 75 Site M5 - page 67 MODIFICATION 79 Site M8 - page 68 MODIFICATION 89 Site M1 - page 71 MODIFICATION 90 Site M1 - page 71 MODIFICATION 90 Site M1 - page 72 MODIFICATION 90 Site M14 - page 72 MODIFICATION 90 Site M15 - page 78 MODIFICATION 101 Site M17 - page 77 MODIFICATION 102 Site M18 - page 78 MODIFICATION 103 Site S2 - page 81 MODIFICATION 104 Site S2 - page 81 MODIFICATION 115 Site S7 - page 86 MODIFICATION 111 Site S7 - page 86 MODIFICATION 113 Site S9 - page 88 MODIFICATION 115 Site S12 - page 91 NOTES Purpose: To improve clarity and ensure consistency across safeguarded sites in the SLWP	and noise im • LARGE B	ut a strengthe pacts, this pr BENEFICIAL IN	oposed modific	cation is expec for (10) Helpi	ted to have: ing to minimise	ing conditions of air pollution and operation of v	nd potential	impacts on ser	nsitive land-us	es (11)		30 sites listed	(all allocated),	++	+++	
	 MEDIUM impacts and soci SMALL E impacts 	BENEFICIAL on the quality al inclusion w BENEFICIAL II of climate cha	of townscape ithin South Lor MPACTS for (6 ange (7) helpin	(9) helping to and visual am ndon.) helping to erig to avoid, rec	deliver sustainenity and the had all resure that all resurce and mana	inable transpornistoric environ new or upgrade new flood risk to or upgraded wa	ment and (1 ed waste mar and from wa	6) helping to p	romote equali ities are adap i	ties, accessibil	re					

							SA	FRAMEWOR	RK OBJECTI	VES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)) ENVIRONM	ENTAL QUAI	_ITY	(D)	COMMUNIT	y well-be	ING
		STRATEGY To optimise and intensify new & existing waste sites to make the mosefficient use o	management up the waste hierarchy.	ECONOMY To promote a transition to a circular economy within south London.	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to	SuDS To avoid, reduce and manage flood risk to or from waste management		(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive landuses arising from waste	(11) ENVIRON- MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities		(13) ECONOMY & EMPLOYMENT To promote employment , & competitive- ness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES OCIAL INCLUSION To reduce exclusion, address inequalities & improve
te C9: Issues to consider – p51 mend issue as follows: Developers planning to intensify evelop the safeguarded site rould pay particular attention to: Designing the site so that roperations, whether already on site or proposed to be situated in replacement buildings, are would be carried out within fully enclosed building(s) that do not impact the openness of the Green Belt/MOL."														+++	+++	
Purpose: To improve clarity and ensure consistency with national policy; Previously Mod 3.3 (with minor changes) DDIFICATION 61	assessed as LARGE E	having:	MPACTS (++) f							n this site do no	·					
te C9: Map - page 1 Eplace existing site boundary th the site boundary in red on the map above. DTES To improve clarity and correct an terror). The previously Mod 3.2	lands Wood On 18 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	S Pear The Farm Cottage Crab Wood Crab Wood	Pear Tree Grove Farm Coidblow Co. Shaw	Pit On (dia)					N	lo significa factual	-	_				

							SA	FRAMEWOR	RK OBJECTI	VES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)) ENVIRONM	ENTAL QUAI	_ITY	(D)	COMMUNIT	Y WELL-BE	ING
	SUFFICIENCY	To optimise and intensify new & existing waste sites to make the mosefficient use o	hierarchy.		CLIMATE MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	To ensure that all waste	SuDS To avoid, reduce and manage flood risk to or from waste management	sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on	MENTAL	BIODIVER- SITY AND HABITATS To protect and enhance biodiversity & habitats	EMPLOYMENT To promote employment , & competitive- ness of the	AND VISUAL AMENITY To minimise	QUALITY OF LIFE To minimise adverse on human health and protect the	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 63 Site C10: Issues to consider – page 52 Amend issue as follows: "The Purley Oaks Highway Depot is an allocated Gypsy and Traveller site in the Croydon Local Plan 2018 and attention should be paid to ensure satisfactory residential amenity of the for any existing and future occupiers of this allocation." NOTES	COMMENTA	DV									+++			+++	+++	+++
	By requiring • LARGE I	proposed was BENEFICIAL I	MPACTS (++)	for (11) minin	nising the <mark>adve</mark>	rse impacts ar	ising from the	construction	and operation	eller site, this p of waste facilit e open environr	ies (14) minim	nising adverse	impacts on the	e quality of tov		
NOTE • The site has planning permission for a waste use but this has not been implemented. Site is currently being used for industrial uses and the land owners do not intend to implement the waste permission • Inspector's Question M3 [v] 6 • Previously Mod 3.6							ſ	No significa	ant impact	ts						
MODIFICATION 71 After Site K4 – page 55 Add new site safeguarding sheet: "K5 Chessington Railhead, Garrison Lane, Chessington, KT9 2LD" See Annex 1 to Modifications Schedule	++	++	++	++					++							
NOTES • Purpose: To consistency, clarity and updates with latest information	 MEDIUM 	BENEFICIAL	IMPACTS (++) for (1) Prom		ufficiency withi				nmentally susta onomy, and (9)						(3)

							SA	FRAMEWOR	RK OBJECTI\	/ES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)	ENVIRONM	ENTAL QUAL	_ITY	(D)	COMMUNIT	Y WELL-BE	ING
	SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the	STRATEGY To optimise	RECOVERY To drive waste management up the waste	ECONOMY To promote a transition to a circular economy withir	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to	FLOOD RISK 8 SuDS To avoid, reduce and manage flood risk to or from waste management	SUST. DESIGN To promote the highest standards of sustainable	TRANSPORT To reduce trips, traffic	To minimise air	(11) ENVIRON- MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	HABITATS To protect and enhance biodiversity & habitats	EMPLOYMENT To promote employment, & competitiveness of the waste sector in Sth London	AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	QUALITY OF LIFE To minimise adverse on human health and protect the	(16) EQUALITIES, 8 SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATIONS 76, 82, 85, 88, 91, 94, 99, 109, 112 and 119 Issues to consider (multiple sites) Amend bullet point as follows: "Designing a facility that does not impact on the openness of takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land".																
MODIFICATION 76: Site M6 - p66 MODIFICATION 82: Site M10 - p70 MODIFICATION 85: Site M11 - p 71 MODIFICATION 88: Site M12 - p72 MODIFICATION 91: Site M14 - p72 MODIFICATION 94: Site M15 - p 75 MODIFICATION 99: Site M16 - p76 MODIFICATION 109: Site S3 - p82 MODIFICATION 112: Site S7 - p86 MODIFICATION 119: Site S12 - p91														+++	+++	+++
NOTES • Purpose: To ensure consistency with national policy and internal	having: • LARGE B	that proposed BENEFICIAL IN	MPACTS (++) f	or (14) minim	ten sites listed sing adverse ir omote equalitic	mpacts on the	quality of tow	nscape and vi	sual amenity a	nd the historic		•				
MODIFICATIONS 77, 83, 87, 92, 93, 95, 100, 106-107 and 118 Issues to consider Insert the following as an additional bullet point: "Protecting the amenity of the Wandle Valley Regional Park and those using it."																
MODIFICATION 77: Site M6, page 66 MODIFICATION 83: Site M10, page 70 MODIFICATION 87: Site M12, page 72 MODIFICATION 92: Site M14, page 74 MODIFICATION 93: Site M15, page 75 MODIFICATION 95: Site M15, page 75 MODIFICATION 100: Site M16, p 76 MODIFICATION 106: Site S2, page 81 MODIFICATION 107: Site S3, page 81 MODIFICATION 118: Site S12, p91														+++	+++	+++
 NOTES Purpose: To improve the clarity and consistency of the SLWP Related to previous Mod 3.1. 	LARGE B	 an additional BENEFICIAL IN	MPACTS (++) f	for (14) minim	the need to 'p sing adverse ir g to promote e	mpacts on the	quality of tow	nscape and vi	sual amenity a	nd the historic						

							SA	FRAMEWOR	RK OBJECTI	VES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)) ENVIRONM	ENTAL QUAI	.ITY	(D)	COMMUNIT	Y WELL-BE	ING
	SUFFICIENCY To provide sufficient sites & waste facilities for all	STRATEGY To optimise and intensify new & existing waste sites to make the mosefficient use of	RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	ECONOMY	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	ADAPTATION To ensure that all waste management facilities are fully adapted to	FLOOD RISK 8 SuDS To avoid, reduce and manage flood risk to or from waste management	sustainable	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land- uses arising from waste facilities	(11) ENVIRON- MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	SITY AND HABITATS To protect and enhance biodiversity &	EMPLOYMENT To promote	impacts on	QUALITY OF LIFE To minimise adverse on human health and protect the	(16) EQUALITIES, SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 86 Site M12: Issues to consider p72 Amend as follows: "Protecting the residential amenity of those properties (both bricks and mortar and Gypsy and Traveller accommodation) in the vicinity of the site, especially with regard to air emissions and noise impacts"						+	+	+	+	++	++			++	+++	+++
NOTES • Purpose: To ensure residential amenity is protected for Gypsy and Travellers	modification LARGE MEDIUM facilities SMALL	that any propis expected to BENEFICIAL I MENEFICIAL S, and (14) m BENEFICIAL Im waste deve	have: MPACTS (+++ IMPACTS (++ inimising adve MPACTS (+) (6) for (15) Help) for (10) Help rse impacts on 5) helping to e	oing to minimis oing to minimis the quality of nsure that all r	ect the residentially action of townscape and the standards of	dverse effects and potential I visual amen d waste mana	on human he impacts on se ity and the his agement facilit	ealth and the o ensitive land-us storic environn ties are adapte	pen environme ses (11) minim nent ed to the future	ent; and(16) he ising the adve	elping to promerse impacts ar	ote equalities, ising from the (7) helping to	accessibility a construction a	and social incl and operation	usion. of waste flood risk to
MODIFICATION 97 Site M16: Issues to consider – p76 Delete "Ensuring development does not adversely affect the adjacent Wandle Valley Conservation Area". Replace with: "Conserving, and where possible enhancing, the significance of the Wandle Valley Conservation Area".											++			++		
NOTES • Purpose: To ensure consistency with national policy • response to Con44/Rep 103 from Historic England and Inspector's Question M4 [vii] 2e	Conservation • MEDIUN	a requiremen Area, rather BENEFICIAL	than just 'not	adversely affects) for (11) mini	cting' it, this p	evelopments or proposed modifi rerse impacts a	icationis asse	ssed as having	g:		·					,

• Previously Mod 12.1

							SA	FRAMEWOR	RK OBJECTIV	/ES						
	(A) SUS	TAINABLE	WASTE MAN	AGEMENT		(B) CLIMAT	E CHANGE		(C)	ENVIRONMI	ENTAL QUAL	_ITY	(D)	COMMUNIT	Y WELL-BE	ING
	SUFFICIENCY To provide sufficient sites & waste facilities for all	STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use o	RECOVERY To drive waste management up the waste hierarchy.	ECONOMY To promote a	MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste	ADAPTATION To ensure that all waste	SuDS To avoid, reduce and manage flood risk to or from waste management	SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on	MENTAL	SITY AND HABITATS To protect and enhance biodiversity &	EMPLOYMENT To promote employment, & competitiveness of the	AND VISUAL AMENITY To minimise adverse impacts on townscape quality and	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 103 Site S1 777 Recycling Centre-p 80 Delete Site S1 '777 Recycling Centre' and any other references to it in the Plan.		+							+	+	+			+		
	localised imp • SMALL B area (10 enhance	this waste sit acts. BENEFICIAL II) Helping to r biodiversity	MPACTS (++) f minimise air po	for (2) Promoti Illution and pot (3) promoting	ng an environr ential impacts	mentally sustai on sensitive la	nable strateg i nd-uses (11)	c approach to minimising the	managing Sou e adverse imp	-sufficiency over uth London's wa acts arising fro of the waste sec	aste arisings (m the constru	9) helping to d ction and oper	eliver sustaina ation of waste	able transport facilities (12)	objectives wi helping to pr	th the plan otect and
NOTES • Purpose: Improve clarity of the SLWP and internal consistency • in response to Inspector's Question M4 [vii] 20 • Previously Mod 12.5	 MEDIUN Helping 	d modification 1 BENEFICIAL to minimise	. IMPACTS for (air pollution an	(8) helping to រ d potential imរ	oacts on sensit	ive land-uses (11) minimisir	ng the adverse	impacts arisir	n new or upgra ng from the cor ocial inclusion w	struction and	operation of w				
MODIFICATION 114 Site S10: Issues to consider – p89 Amend bullet point as follows: "Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads"		++			++				++	++	++	+		+	++	+
NOTES	not to hinder MEDIUN climate construe SMALL I	traffic flow of traffic flow of the flow o	n the surround IMPACTS (++ nelping to deliveration of waste MPACTS (+) f	ling roads, this) for (2) Promer sustainable e facilities (15) or(12) helping	s proposed mod oting an environ transport objet Helping to min to protect and	dification is assonmentally sus ectives (10) Hel nimise potentia	essed as havi tainable strate ping to minin lly adverse ef versity and h	ng: egic approach nise air pollutio fects on huma	to managing S on and potenti on health and t	etwork (in discussions) South London's al impacts on since the open environs on series on the control of the c	waste arisings ensitive land-tonment; and	s) (5) helping t uses (11) mini	to minimise C o mising the adv	O ₂ emissions a verse impacts a	nd address th arising from t	he causes of the

No significant impacts – factual change

South London Waste Plan: Final SA Addendum Report on Main Modifications (February 2022)

Update Appendix 2 in accordance with Annex 3 to this Schedule of

consistency, clarity and updates with the latest information.

Main Modifications

Purpose: Contributes to

NOTES

amenity and the historic environment

							SA	FRAMEWOR	RK OBJECTI	VES						
	(A) CH	(A) SUSTAINABLE WASTE MANAGEMENT (B) CLIMATE CHANGE (C) ENVIRONMENTAL QUALITY (D) COMMUNITY WELL-BEING														INC
	(A) SU:	STAINABLE	WASIEMAN	IAGEMENT		(b) CLIMAT	E CHANGE		(C) ENVIRONM	ENTAL QUAI	_1 I I	(D)	COMMONT	T WELL-DE	ING
	& waste facilities for a waste stream making up th	To optimise s and intensify	RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy withir south London.	causes of climate change by minimising	To ensure that all waste management facilities are fully adapted to	FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management	sustainable design and	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive landuses arising from waste facilities	MENTAL PROTECTION To minimise the adverse		EMPLOYMENT To promote employment, & competitiveness of the waste sector in	impacts on townscape quality and	QUALITY OF LIFE To minimise adverse on human health and protect the	(16) EQUALITIES, SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
MODIFICATION 123 Appendix 4: Glossary – page 104 Additions to the Glossary:													1		environment	
'Consented Waste Site: A site that has planning permission for a new waste management facility or an existing, Site that has planning permission where an increase in intensification is permitted, for example where: longer operating times are permitted on the existing site; and/or additional storage, machinery, buildings, parking or access roads are permitted on the existing site; and/or the boundary of the site is extended to allow for either of the above.		No significant impacts – factual change														
Existing Waste site: A waste site that is materially in operation as a waste site Safeguarded Waste site: A site that is safeguarded for waste uses. This may include sites that are materially operational as waste facilities, vacant waste facilities or vacant plots of land that are safeguarded for waste.																
MODIFICATION 124 Appendix 5: Superseded Policies – page 106 Add new Appendix 5 as follows: Appendix 5 South London Waste Plan 2012 Superseded Policies							No signif	icant impa	cts – facti	ual change						

(*various)

3. Conclusions

Findings of the SA Addendum Report on Main Modifications

- 3.1 This Final SA Addendum Report has been prepared in order to assess the likely impacts of each of the Main Modifications to the draft South London Waste Plan (SLWP) on the environmental, social and economic objectives making up the SA Framework. The Main Modifications subjected to appraisal in Section 2 are based on the finalised Schedule of Proposed Modifications prepared for consultation by the four SLWP Boroughs in February 2022. This consolidates the Proposed Modifications¹⁴ submitted to the Inspector in July 2021 with number of further changes which have been proposed subsequently in order to address matters of 'soundness' considered at the Examination in Public (EiP) in September 2021, the Inspector's closing remarks and recommendations set out in the Inspector's subsequent letter. There are 131 modifications in total.
- 3.2 The appraisal matrix presented in Section 2 of this SA Report therefore consolidates the appraisal matrix set out in the previous SA Report on Proposed Modifications originally submitted to the Inspector in July 2021 together with additional appraisal work undertaken on the further changes. However many of the original modifications which were appraised in the previous SA Report have been brought forward unchanged (although with revised numbering).
- **3.3** The outcome of this final appraisal shows that all 152 of the Main Modifications which constitute a material change in policy have potentially significant beneficial impacts on a range of sustainability criteria. None of the modifications is assessed as assessed as having a negative impact (i.e. by comparison with *not* introducing the change and continuing with the original policy wording).
- **3.4** This findings of this SA Addendum Report should be read in conjunction with the previous SA Reports on the Draft SLWP (Proposed Submission) prepared for Regulation 19 consultation in September 2020 and on the Proposed Modifications (July 2021); the Habitats Regulations Assessment (HRA) screening report, the Equalities Impact Assessment (EqIA) and the forthcomimng Waste Annual Monitoring Report (AMR) 2020-21.

Overall sustainability appraisal conclusions

- 3.5 Throughout all stages of plan preparation, the SA process report has been prepared in line with best practice and meets all of the requirements for the content of sustainability appraisals and strategic environmental assessments (SEA) laid down in government planning practice guidance and the SEA regulations respectively. It is soundly based upon the best available local evidence for each of the four boroughs and draws upon the initial analysis of site throughput, capacity and environmental constraints set out in the South London Technical Paper prepared by Anthesis consultants in June 2019, subsequent detailed site appraisal work undertaken by the four boroughs, updated information from site operators, consultation responses and updated information on waste throughputs (WDI).
- 3.6 The report builds upon the SA Scoping Report published in September 2019 and the previous SA Reports on the SLWP Issues and Preferred Options document published in October 2019, the

South London Waste Plan: Final SA Addendum Report on Main Modifications (February 2022)

 $^{^{14}}$ the proposed Modifications submitted to the Inspector in July 2021 consiusted of the Main Modifications initially submitted to the Inspector alongside the draft SLWP on 19 January 2021 together with the Additional Main Modifications which were proposed subsequently in the light of the Inspector's schedule of matters, issues and questions (MIQs) - see https://drive.google.com/file/d/13PYU-TX59iM4GNfTz8hGqQqi6dmqNDu/vie

Proposed Submission (September 2020) Modifications (July 2021). As part of the appraisal process, the SA Framework has been refined to take account of comments from the Environment Agency, Natural England and Historic England.

- 3.7 The SA on the draft SLWP Proposed Submission, when read together this Final SA Addendum Report on Main Modifications, demonstrates that the final SLWP 2022-37 (Option 1 amended), will have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012 (Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 are shown to be overwhelmingly negative.
- **3.8** Overall, the most important sustainability benefits of the finaliased SLWP, incorporating nain modificatyions, include:
- achieving **net self-sufficiency** within South London by providing sufficient sites and waste management facilities to both meet (but not exceed) the new apportionment targets for household and C&I waste and to manage future C&D waste arisings over the plan period to 2036; eliminating the need to identify additional waste sites and by developing more efficient, effective and cleaner management practices in partnership with the waste industry;.
- promoting an environmentally sustainable strategic approach to managing South London's waste arisings by optimising and intensifying the capacity of existing waste management sites; avoiding the uptake of additional employment land for waste management operations where appropriate; and minimising HGV movements and other potentially adverse environmental impacts associated with waste management activities by promoting complementary uses such as manufacturing from waste;
- promoting sustainable transport objectives by eliminating the need to identify additional waste management sites or 'broad locations' in South London (thus reducing adverse impacts on the strategic/ local road network arising from HGV movements); and by intensifying of existing waste management uses on suitable sites or co-locating complementary uses in industrial areas;
- minimising air pollution and potential impacts on sensitive land-uses and vulnerable receptors (including equalities target groups) arising from waste facilities by reducing waste-related HGV movements on the strategic/ local road network; developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and avoiding any further deterioration in air quality particularly within 'Air Quality Focus Areas';
- moving waste management practices further up the waste hierarchy by promoting waste reuse, recycling and recovery towards achieving the Mayor's targets of 65% recycling of municipal waste by 2030 and zero biodegradable or recyclable waste landfilled by 2026;
- helping to secure the transition to a **circular economy** within south London and keeping products and materials at their highest use for as long as possible by encouraging the colocation of complementary uses such as secondary material processing facilities and supporting manufacturing from waste; and

promoting local employment, South London's economy and the competitiveness of the waste sector by safeguarding employment land and floorspace within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste management uses (this is particularly important in Sutton, where the strategic demand for industrial, logistics and related uses is anticipated to be the strongest).

Next Steps

- **3.9** This Final SA Addendum Report on Main Modifications will be published for consultation together with the draft SLWP, the Schedule of Proposed Modifications and the EqIA between xxx MONTH and YYY MONTH. Following final approval of the plan by the four boroughs, the final SLWP 2022-2037 will subsequently be adopted later in 2022
- **3.10** All information relating to the examination process will be made available online at www.sutton.gov.uk/wasteplan

