

# SOUTH LONDON **WASTE PLAN**

Summary of the response received to  
the Issues and Options Consultation

**February 2009**

**CROYDON  
COUNCIL**  
[www.croydon.gov.uk](http://www.croydon.gov.uk)



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## **Introduction**

1.1 This report summarises the responses received to the first consultation (the 'Issues and Options' consultation) on the development of the Waste Development Plan Document being jointly prepared by the boroughs of Croydon, Kingston, Merton and Sutton. The Plan is known as the South London Waste Plan.

1.2 The Issues and Options consultation took place from September to October 2008. The responses received will help inform the development of a draft Waste Plan which will be ready for consultation from mid-July to the end of September 2009. A transparent assessment of each potential site's suitability for waste development, an assessment of the deliverability of each site and conclusions from the Sustainability Appraisal<sup>1</sup> will also inform the content of the draft Waste Plan.

1.3 A wide range of stakeholders provided responses to the first consultation phase. Some are individual's views, whilst some represent much larger organisations such as residents groups and local environmental organisations. Responses were also received from government bodies (e.g. the Environment Agency and the Greater London Authority) and utilities companies (e.g. Thames Water). A number of responses were also received from waste management companies.

1.4 It is important to note that organisations and individuals responded to the consultation in different ways. Some filled in all or part of a questionnaire, others wrote letters or e-mails covering some or all of the questions raised. Additionally, a number of responses were made at the four public workshops held to consider the Issues and Options. Only those who responded to the questionnaire are included in the statistics (graphs). Feedback from those who responded in other ways is captured in the discussion of each question contained within this report.

1.5 Feedback is arranged into the following key sections:

**Issue 1:** The Vision and Objectives of the South London Waste Plan

**Issue 2:** How much of our waste should we deal with?

**Issue 3:** Distribution of waste management sites

**Issue 4:** Where should the new facilities go?

**Issue 5:** Should the Waste Plan specify what waste development is suitable for each site eventually identified?

**Issue 6:** Implementing the Plan

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<sup>1</sup> The SA report identifies the key sustainability issues likely to be affected by the implementation of the South London Waste Plan so that assessment of significant effects can be identified at the earliest opportunity. A number of SA reports are completed throughout the Plan's development and consideration of their conclusions will help ensure the Plan is developed in conformity with the Government's sustainable development agenda.

## **A summary of the consultation response**

1.6 The consultation was advertised in the following ways:

- ✓ In the local press and in borough magazines
- ✓ On all boroughs' websites
- ✓ Display of posters, leaflets and consultation materials (questionnaires) in council main receptions and all libraries
- ✓ Direct mail to all contacts on each planning department's Local Development Framework database (i.e. all local residents who have previously shown interest in the development of their borough's strategic planning documents)

1.7 An Issues and Options consultation document was prepared containing a questionnaire<sup>2</sup>. A leaflet containing a shortened version of the questionnaire and less technical information was also prepared to appeal to a wider audience<sup>3</sup>. These, together with background technical documents<sup>4</sup> were available electronically via the waste planning pages of each borough's websites.<sup>5</sup>

1.8 An evening public workshop was held in each borough in September and October 2008. We also encouraged local community groups to invite us to attend their meetings. Meetings of the following groups were attended by the Waste Planning Project Manager to discuss the Waste Plan:

- The Mitcham Society, Merton
- Kingston's Ecofootprint group
- The Hawkes Road Residents Association, Kingston
- The Chessington District Residents Association, Kingston
- The Sutton and Croydon Green Party
- The Mitcham Partnership, Merton

1.9 Over 100 stakeholders provided written response to the consultation:

**41 responded via the full questionnaire** (14 online)

**48 responded via the short questionnaire** (16 online)

**30 responded via letter or Email** making specific comments

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<sup>2</sup> 'Issues and Options Consultation Document,' September 2008 published jointly by the boroughs of Croydon, Kingston, Merton and Sutton

<sup>3</sup> 'Consultation on moving away from landfill,' September 2008 published jointly by the boroughs of Croydon, Kingston, Merton and Sutton

<sup>4</sup> The South London Waste Plan Technical Report, The Habitats Directive Assessment, The South London Waste Plan Interim Sustainability Appraisal

<sup>5</sup> [www.croydon.gov.uk/wasteplan](http://www.croydon.gov.uk/wasteplan); [www.kingston.gov.uk/wasteplan](http://www.kingston.gov.uk/wasteplan); [www.merton.gov.uk/wasteplan](http://www.merton.gov.uk/wasteplan); [www.sutton.gov.uk/wasteplan](http://www.sutton.gov.uk/wasteplan)

1.10 In addition, **87 people attended the workshops** and provided their views in group discussions which are captured in a full write-up of the workshops (Appendix A to this report).

1.11 The remainder of this report presents the response to the consultation questionnaire. Feedback received through written comments or points made at the workshops are incorporated throughout this report.

1.12 Two appendices are available to this report:

**Appendix A** is the write up from the four public workshops held during the consultation period, and;

**Appendix B** contains *all* comments received in response to the consultation.

1.13 This report and Appendices A and B identified above are available via each borough's waste planning web pages. Alternatively, please contact the Project Manager (details below).

**All South London Waste Plan report available from:**

[www.croydon.gov.uk/wasteplan](http://www.croydon.gov.uk/wasteplan)

[www.kingston.gov.uk/wasteplan](http://www.kingston.gov.uk/wasteplan)

[www.merton.gov.uk/wasteplan](http://www.merton.gov.uk/wasteplan)

[www.sutton.gov.uk/wasteplan](http://www.sutton.gov.uk/wasteplan)

**Get involved**

To be involved in future consultations, please contact the Waste Planning Project Manager:

**Telephone:** 020 8547 5375

**Email:** [southlondonwasteplan@rbk.kingston.gov.uk](mailto:southlondonwasteplan@rbk.kingston.gov.uk)

**Write:** The Project Manager  
The South London Waste Plan  
Planning Policy Team  
Royal Borough of Kingston Upon Thames  
Kingston Upon Thames  
KT1 1EU

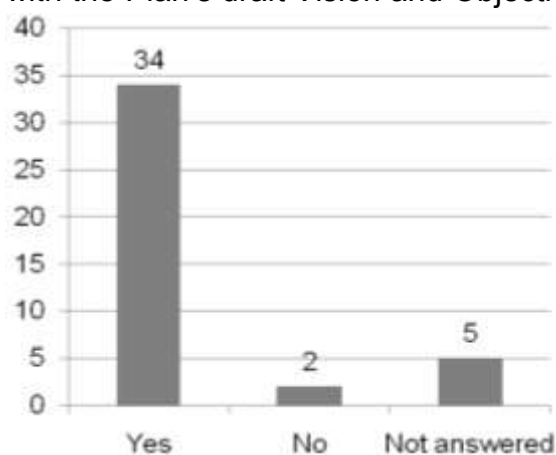
**Thanks to all of you who responded to the Issues and Options consultation for the South London Waste Plan.**

## Issue One: The Vision and Objectives of the South London Waste Plan

**Q1** Do you agree with the Plan's draft Vision and Objectives? *This question was only asked in the full questionnaire.*

**Options:** Yes or No

**Figure 1:** Number of respondents choosing each option for Q1: Do you agree with the Plan's draft Vision and Objectives?



**Response:** Yes. 34 out of the 36 respondents replying to this question support the Plan's draft Vision and Objectives.

2.1 Although there was general support in principle for the draft Vision and Objectives, most respondents suggested amendments and additions. These are summarised below.

**Q2** Would you suggest any changes or additions to the Plan's Vision and Objectives? *This question was only asked in the full questionnaire.*

**Options:** Yes or No

**Response:** The following changes / additions were suggested (most frequently mentioned responses are listed first):

- Include reference to supporting waste minimisation
- Include reference to supporting waste-derived renewable energy generation
- Clarify 'best place' and 'best technology'
- Include reference to methane-capture from any landfill
- Include reference to looking for sites outside the Plan's borders
- Include reference to reducing climate change
- Include reference to health and well-being
- Promote *modern* waste management facilities
- Include reference to the sustainable transport of waste
- Make the objectives more locally distinctive

2.2 A strong theme at workshops and in written responses was for the South London Waste Plan to acknowledge the importance of *preventing* waste. Retailers, notably supermarkets were frequently identified as needing to do more to minimise the amount of waste arising in the first instance by reducing unnecessary packaging. The work of the government organisation, WRAP (the Waste and Resources Action Programme) who are responsible for working with retailers and suppliers to reduce waste, was highlighted in workshops.<sup>6</sup> In addition, representatives from the borough's waste teams highlighted the work and campaigns undertaken by the partner authorities to encourage waste reduction amongst householders and local businesses.

### **How these views will be reflected in the draft Waste Plan**

2.3 The suggestions will be discussed further and where appropriate, incorporated into the Plan's Vision and Objectives. Some suggestions, for example identifying sites *outside* the Plan area, will not be appropriate. This is because the London Plan requires the South London Waste Plan to identify sufficient sites *within its own boundaries* to manage the quantities of waste identified in the London Plan for the four boroughs (the 'apportionment'). The London Plan provides the overarching planning policy direction for London and local planning documents must be in general conformity with it. In this case, the Waste Plan must identify sufficient sites within its own boundaries to meet the apportionment in order for the Plan to be found 'sound' by an independent Inspector following Submission to the Secretary of State. The 'apportionment' is explained in section 3.4 of the Issues and Options Consultation Document. In addition, surrounding regions are identifying their own sites and it would not be appropriate for the South London Waste Plan to identify sites outside its own boundaries.

2.4 Whilst preventing and minimising waste is not directly a land use planning issue, the draft Waste Plan will identify the work being undertaken by WRAP and each borough's waste teams to clarify that waste planning is not being carried out in isolation, but is part of a wider strategy.

2.5 In response to feedback from the Government Office for London (GOL) and suggestions from some local residents, the draft Waste Plan will also acknowledge the waste planning work being carried out by neighbouring local authorities, since it will be important to establish whether these authorities' waste plans have any implications for the South London Waste Plan area.

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<sup>6</sup> Find out more about WRAP's work with retailers at: <http://www.wrap.org.uk/retail/index.html>

## Issue Two: How much of our waste should we deal with?

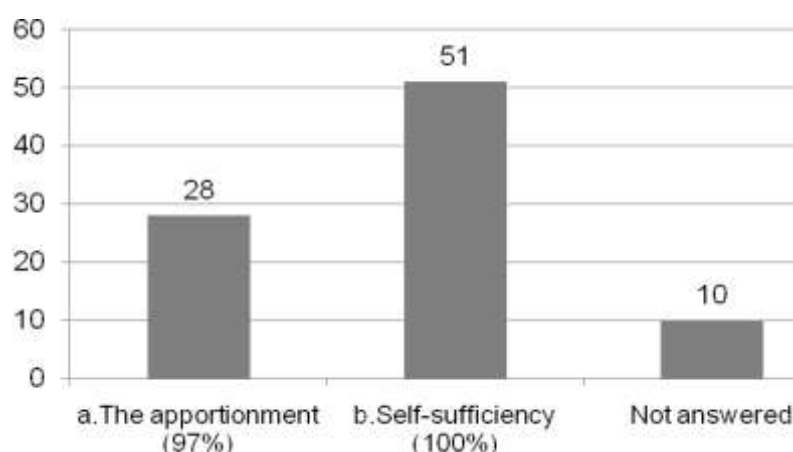
**Q3** How much municipal, commercial and industrial waste should the South London Waste Plan, plan to manage? *This question was asked in both the full and short questionnaire and considered at workshops.*

### Options:

a. The Waste Plan should allocate sufficient suitable sites for waste management facilities to meet the apportionment in 2021 (the equivalent of 97% of the waste produced in the boroughs at 2021)

b. The South London Waste Plan should allocate sufficient suitable sites for waste management, to manage 100% in 2021 (Note: this represents approximately 40,000 tonnes a year more than option A)

**Figure 2:** Number of respondents choosing each option for Q3: How much municipal, commercial and industrial waste should the South London Waste Plan, plan to manage?



**Response:** Option B was chosen by the majority of respondents.

### Analysis of response: local stakeholders

3.1 Views were split at workshops. The majority of participants took the view that the Plan should deal with at least the apportionment figure if not *all* of the waste arisings within the four boroughs. Despite planning for waste management locally now being a government and regional requirement, a minority still feel that waste should continue to be transported elsewhere (out of their borough, out of London or out of the country altogether) despite landfill costs and climate change effects.

3.2 Those advocating planning to manage 100% observed that planning for self-sufficiency would provide a safety net to ensure we're more likely to meet our apportionment. One resident speaking at a workshop in Sutton observed that, "If 100% isn't achieved, at least try. If we go for 97% [we]

*probably won't achieve it either [and] we will be back here again in 5 years or less."*

### **Analysis of response: Government bodies**

3.3 Government bodies didn't offer a consensus of opinion on this question. Whilst the Environment Agency (EA) recommends planning for the apportionment, the Highways Agency (HA) advocates managing as much waste as possible locally to reduce road transport impacts on the strategic road network. GOL and the Greater London Authority (GLA) make no comment on this question.

3.4 Natural England observes that even though we are required by the London Plan to plan for the apportionment, we may also wish to give consideration to allocating spare capacity, which could be advantageous in respect of possible future population increases.

### **Analysis of response: the waste management industry**

3.5 Six of the eight waste management industry responses support self-sufficiency; one favours planning to meet the apportionment and one did not provide a response to this question.

3.6 The issue of flexibility raised by Natural England is echoed by the waste management company, Sterecycle who observes that given the historic difficulties of delivering waste management facilities, there is a very strong possibility that many of the sites allocated for waste development will not become available during the Plan's lifetime. They therefore recommend *over-*allocating sites within the Plan, to compensate for the likely failure to deliver some allocated sites.

### **Main areas of conflict and consensus**

3.7 There are mixed views, but a general consensus that the Plan should aim to facilitate the development of sufficient facilities to deal with as much waste produced within the four boroughs as possible. Many thought this would result in the greatest environmental benefit (in terms of reduced travel for waste and the greatest diversion of waste from landfill). The waste management industry generally advocates aiming to manage the equivalent of self-sufficiency within the Plan area, thus giving the Plan greater flexibility and a greater likelihood of meeting our allocated waste apportionment. However, there remains a minority of local residents who are not comfortable with the requirement to manage waste within our borough boundaries at all.

### **How these views will be reflected in the draft Waste Plan**

3.8 Greater consideration of the advantages and disadvantages of planning either for self-sufficiency or the apportionment is required. The uncertainties over the availability and take up of waste sites by the industry suggests that partner boroughs should consider whether the Plan should

identify *more* suitable sites than are needed, to build maximum flexibility into Plan. Partner boroughs will also give greater consideration to the *availability* of sites over the coming months as the Plan develops in response to the industry's concerns

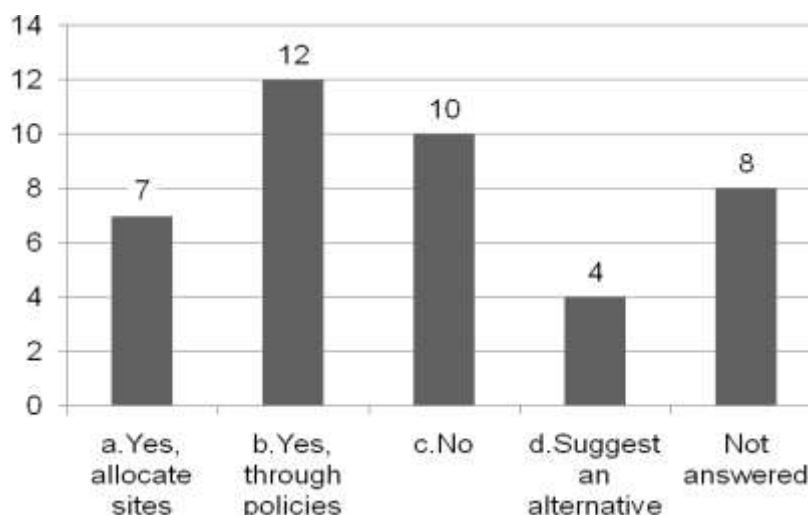
3.9 Draft policies covering these issues will be developed over the coming months and be included in the draft Waste Plan, due for consultation from July to September 2009.

**Q4 Should the South London Waste Plan seek to manage construction, demolition and excavation wastes?** *This question was only asked in the full questionnaire.*

**Options:**

- a. *Yes, the Plan should make assumptions on arisings and include some extra land allocation to manage this*
- b. *Yes, the Plan should make provision for the sustainable management of this waste stream through policies, not through additional land allocation*
- c. *No, the Plan should assume that disposal of these waste streams in South London follow the national trend and are deal with elsewhere, therefore needing no additional provision*
- d. *None of the above. Please suggest an alternative option and your reasons for this*

**Figure 3:** Number of respondents choosing each option for Q4: Should the South London Waste Plan seek to manage construction, demolition and excavation wastes?

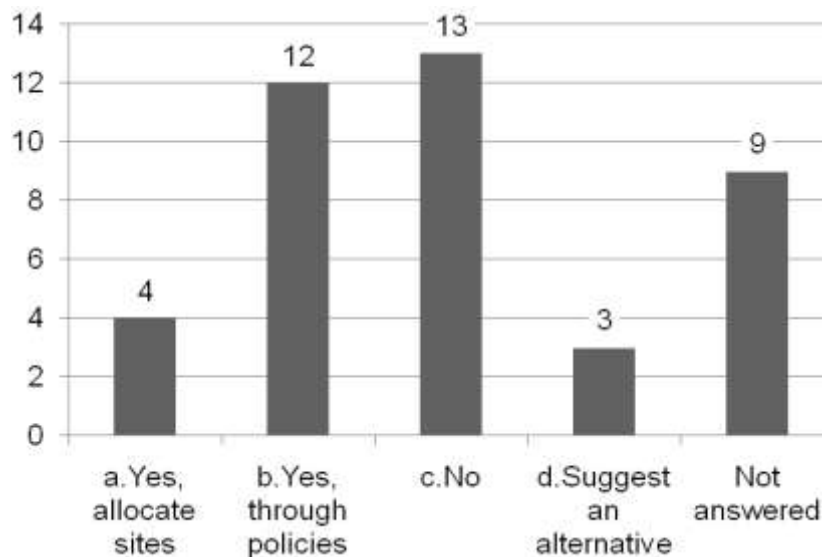


**Response:** Mixed, though most respondents feel the Waste Plan should address construction, demolition and excavation waste, with slightly more feeling this should be through policies instead of site allocation.

**Q5** Should the South London Waste Plan seek to manage hazardous waste? *This question was only asked in the full questionnaire.*

**Options:** Options (as for Q4)

**Figure 4:** Number of respondents choosing each option for Q5: Should the South London Waste Plan seek to hazardous waste?

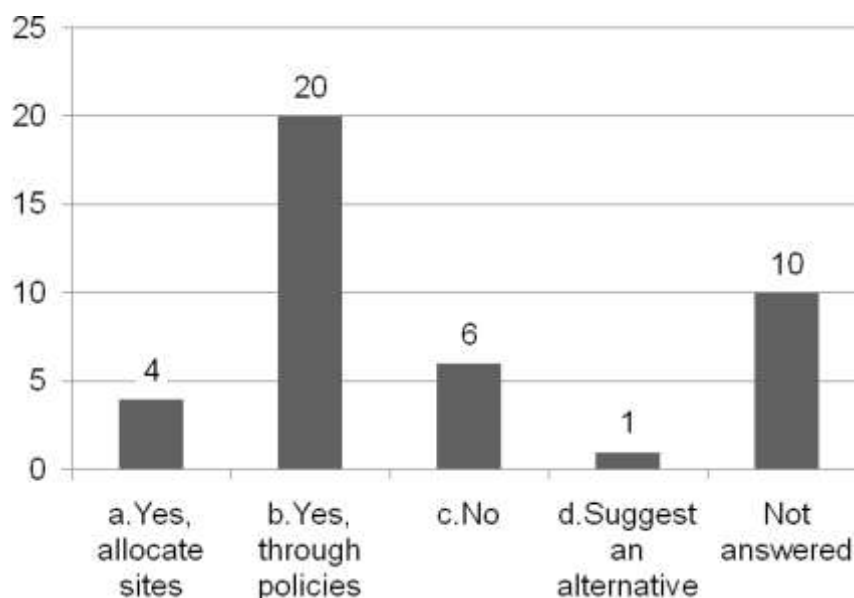


**Response:** Mixed.

**Q6** Should the South London Waste Plan seek to manage agricultural waste? *This question was only asked in the full questionnaire.*

**Options:** Options (as for Q4)

**Figure 5:** Number of respondents choosing each option for Q6: Should the South London Waste Plan seek to agricultural waste?



**Response:** Yes. The majority of respondents feel that overall, the Waste Plan *should* address agricultural waste and most feel that this is best achieved through policies.

### **Analysis of response: local stakeholders**

3.10 Of all the additional waste streams, hazardous waste gave rise to most comment. All respondents who feel that hazardous waste should *not* be addressed in the Plan are local residents or groups representing local concerns. The issue of hazardous waste management was also raised in workshops. Amongst local residents and groups, there is a general feeling that hazardous waste has health implications and is best dealt with in specialist facilities outside the Plan area. For example, the East Coulsdon Residents Association responded that, *“No hazardous waste should be collected and processed in residential areas.”*

3.11 Property developer, Berkeley Homes also raised concerns in their response; *“We believe that hazardous waste contains hazardous properties that may be harmful to human health and the environment. This poses particular risks to health and the environment therefore it is very important that they are managed properly in specialist facilities.”*

### **Analysis of response: Government bodies**

3.12 Government bodies generally feel the Waste Plan should address *all* of the additional waste streams. The HA also advocates management of these other waste streams within the Plan area because this will reduce the need for transporting waste, thus reducing traffic impacts.

3.13 The EA encourages planning authorities to require the submission of Site Waste Management Plans with developers' applications to ensure that construction, demolition and excavation wastes are properly managed. With regard to hazardous waste, the EA feels that clarification is required to differentiate between categories of hazardous waste arising in the Plan area. They agree that most waste will continue go to specialist regional or national facilities, but some, such as waste electrical and electronic equipment (WEEE) could be handled locally. With regard to agricultural waste, the EA believes policies should encourage its sustainable management; in particular, the beneficial use of organic waste both on land and as a source of renewable energy, for example through anaerobic digestion processes.

3.14 Although the evidence base in the accompanying technical report identifies only small quantities of hazardous waste produced in the area and assumes small arisings for agricultural waste, GOL would like the Waste Plan to identify how additional waste streams will be dealt with, should their arisings increase in future.

### **Analysis of response: the waste management industry**

3.15 The majority of responses from the waste management industry feel these waste streams should be managed through *policies*, not through site allocations. As one waste management company, Viridor, observes, *“It may well be difficult to accurately forecast arisings and translate these figures into land allocation, so a supportive policy stance would be the preferable approach.”*

### **Main areas of conflict and consensus**

3.16 There is general support across the stakeholders for policies to support the sustainable management of agricultural and construction, demolition and excavation wastes.

3.17 There are mixed views on the management of hazardous waste, with some local stakeholders preferring that this is ruled out of the Waste Plan and government bodies encouraging the Plan to address this waste stream, though not necessarily through land allocations.

3.18 There is a general consensus that an accurate forecast of the additional land allocation for any of these additional waste streams could be difficult to achieve.

### **How these views will be reflected in the draft Waste Plan:**

3.19 Construction, demolition, excavation, hazardous and agricultural wastes represent only a minor proportion of the total waste produced in the Plan area compared to commercial, industrial and municipal waste. The partner boroughs will need to consider how building flexibility into the plan by identifying more suitable sites than are needed to meet the apportionment and/or the equivalent of self-sufficiency could provide sufficient flexibility to manage these other waste streams.

3.20 Draft local policies will be developed to address these waste streams, which will be included in the draft Waste Plan, due for consultation from July to September 2009.

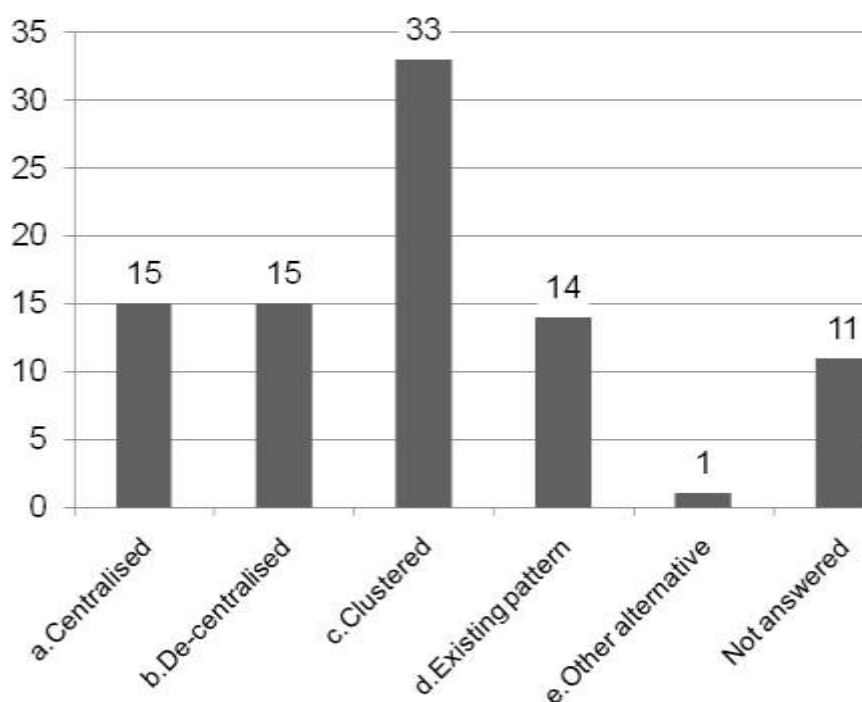
### Issue Three: The distribution of waste management facilities

**Q7** How should the land allocated to waste management be distributed in the South London Waste Plan? This was asked in both the full and short questionnaire and discussed at the workshops.

**Options:**

- a. The Waste Plan should take a centralised approach
- b. The Waste Plan should take a de-centralised approach
- c. The Waste Plan should take a clustered approach
- d. The Waste Plan should rely on the existing pattern of waste management facilities
- e. None of the above. Please suggest an alternative

**Figure 6:** Number of respondents choosing each option for Q7: How should the land allocated to waste management be distributed in the South London Waste Plan?



**Response:** Clustered. The majority of respondents would prefer a clustered approach to the distribution of facilities, though all options received some support.

#### Analysis of response: local stakeholders

4.1 This question was considered at the workshop, though no consensus was reached in these meetings. Most residents saw the logic of looking at the existing sites and industrial land across the boroughs as a sensible area of search. With regard to distribution, some participants felt that larger sites would work best by creating economies of scale, whilst others felt that a larger number of smaller groupings of facilities would cause fewer impacts. In some workshop groups, there was support for certain waste facilities, notably small recycling and composting, on a neighbourhood scale.

4.2 In considering this question, some felt that there are a range of factors which will have a greater influence on the distribution of land allocated to waste management, rather than choosing a preferred spatial pattern and finding sites to fit this. Some residents observed that the waste transport method will have an impact on which sites are developed. For example, should a developer wish to transport waste by rail, they will choose sites located close to the rail network. Others noted that waste facilities producing heat and power would probably need to be located close to sites of major heat and power demand. One local resident also observed that it may even be difficult to find sites of sufficient size within the Plan area to support a centralised approach. A number of residents think that the distribution will be affected by availability of sites which are sufficiently removed from residential properties.

4.3 Neighbouring waste planning authority, Surrey County Council observed that the South London Waste Plan area probably doesn't lend itself to a particular approach and that land availability for waste development should be the major consideration, which will probably be close to reflecting the existing pattern of waste management facilities.

4.4 One local MP acknowledged the need to consider equity in the waste planning process by observing that there is *"the need for these facilities to be more or less evenly distributed throughout the four Boroughs. Any criteria that identified just one Borough as the appropriate location for the bulk of the waste management facilities would not be acceptable."* This is echoed by the South London Waste Partnership who also advocates a distribution of sites across the four boroughs.

#### **Analysis of response: Government bodies**

4.5 The EA observes that the cluster approach offers a realistic and flexible approach to the delivery of waste management facilities. They believe that the numbers and types of sites available, along with the existing mix and location make this more achievable than a centralised approach. The HA also prefer this option because they believe this spatial pattern will ensure that waste disposal sites are located close to the sources of waste, therefore reducing the need to travel. The HA also suggests that sustainable travel opportunities should be used wherever possible, which will influence the distribution pattern.

4.6 The GLA favours the creation of opportunities for the co-location of facilities and the production of local energy and heat which they feel is likely to be best delivered through a clustered/de-centralised distribution. However, the GLA do not rule out a centralised approach.

4.7 Natural England offers no opinion on distribution of sites at this stage, though observes that the enhancement of existing waste management facilities is a sensible starting point, followed by assessing other industrial land.

#### **Analysis of response: The waste management industry**

4.8 The response from the industry is mixed. Two respondents cite a centralised approach as their preferred choice since this would facilitate co-location of facilities, provide the benefits of economies of scale and ensure that sites are large enough to ensure flexibility on the nature of the technologies for waste treatment offered, though with the caveat that, *"this should not prevent development of smaller, de-centralised sites for local recycling and waste transfer."*

4.9 One respondent would prefer an approach based on existing waste management facilities whilst another opts for a clustered approach, though with the suggestion that, *"in practice, all approaches are likely to be necessary to secure adequate provision of waste management facilities."*

4.10 Planning consultants, Rolfe Judd, who have experience of waste management planning responded that identifying a preferred distribution pattern for waste management facilities is overly prescriptive and could serve to limit the availability of suitable sites. They suggest that, *"It would not be appropriate to restrict a new development if it did not fit in with the preferred policy approach. ....The distribution will be affected by other factors such as land availability, property markets and developers/owners desire to bring sites forward as waste facilities."*

#### **Main areas of conflict and consensus**

4.11 There are mixed views about a distribution pattern, though a greater leaning towards a clustered approach. There seems to be a general feeling across all stakeholder groups that the development of sites is more likely to be based on availability of suitable sites which is dependent on a range of factors relating to the development, rather than whether they fit in with a particular distribution pattern.

#### **How these views will be reflected in the draft Waste Plan**

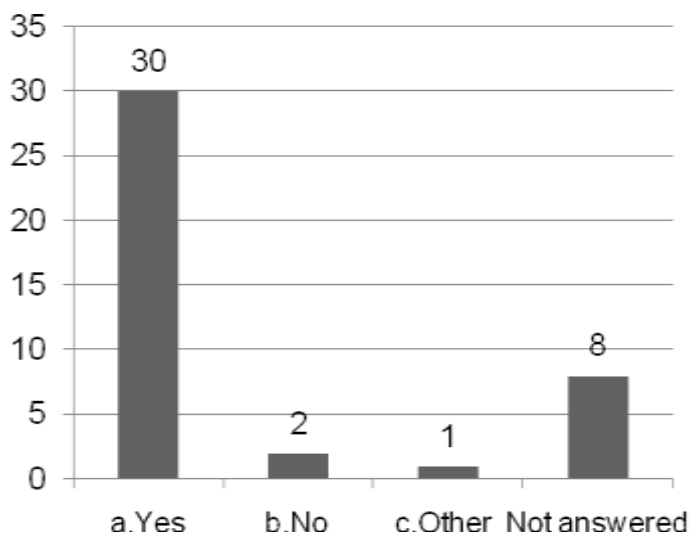
4.12 The distribution of facilities will be influenced by the Sustainability Appraisal, an assessment of the deliverability of potential sites and a transparent assessment of the suitability of all sites, in accordance with the criteria consulted on during the Issues and Options consultation. This work is underway and policies will be developed over the coming months, to be included in the draft Waste Plan, due for consultation from July to September 2009.

**Q8 Should the South London Waste Plan support the co-location of facilities?** *This was only asked in the full questionnaire*

**Options:**

- a. Yes, the Waste Plan should identify policies to support the co-location of:
  - ai) Manufacturing-from-waste with waste management facilities
  - aii) Renewable energy generation with waste management facilities
- b. No, the Waste Plan should not identify policies to support co-location of facilities

**Figure 7:** Number of respondents choosing each option for Q8: Should the South London Waste Plan support the co-location of facilities?



**Response:** Yes, the Plan should support the co-location of both manufacturing from waste and renewable energy generation. Of the 30 'yes' responses, two support *only* co-location with manufacturing from waste (i.e.do *not* support the co-location of waste facilities with energy generation)

**Analysis of response: local Stakeholders**

4.13 Overall, respondents are supportive of the co-location of waste facilities with manufacturing from waste and facilities which produce renewable energy. At the workshops, participants tended to see the logic of 'closing the loop' between production of waste and dealing with it in more sustainable ways.

4.14 The two respondents who believe that the Waste Plan should *not* support the co-location of either manufacturing from waste and renewable energy generation are both local residents, one of whom felt that support for renewable energy would pave the way for an incinerator within the Plan area.

4.15 The discussion of renewable energy has inevitably lead to discussion in workshops and receipt of comments about some types of thermal treatment facilities, notably incinerators, about which there appears to be very mixed views. Some comments received suggest that waste to energy facilities

should be ruled out of the Waste Plan, citing negative health implications, whilst others suggest that modern types of energy from waste facilities which are well-controlled could be suitable; particularly citing the benefits of a secure and affordable supply of heat and power which many feel is becoming increasingly important.

#### **Analysis of response: Government bodies**

4.16 The EA supports the concept of co-locating facilities, as does the HA who believes it could reduce the number of waste vehicles on the roads as a result of the output materials from a waste facility being used onsite either in re-manufacturing or energy generation. The GLA feels that opportunities for the co-location and local energy and heat use should be favoured and London Plan policies encourage this. Neither GOL, nor Natural England has specific comments on this issue.

#### **Analysis of response: The Waste Management Industry**

4.17 The co-location of waste management facilities with manufacturing-from-waste industries and energy production is supported by all respondents from the waste management industry. Three respondents from the waste industry state that although they support the co-location of renewable energy generation with waste facilities in principle and would encourage policies around this, they believe the Plan should not be a prescriptive policy requirement. This is because there are complex issues around distance from heat and power users and affordability which need to be considered by developers on a site by site basis.

4.18 Waste management company, SITA UK observes that the consultation document only refers to co-location to support manufacturing-from-waste and renewable energy with waste management facilities and that it should also provide support for the co-location of different waste management facilities on the same site. The industry also suggests that the partner boroughs consider what support the Plan might give to production of waste derived fuels to be transported for use elsewhere.

#### **Main areas of conflict and consensus**

4.19 The majority of respondents support the co-location of manufacturing-from-waste industries with waste management facilities. Whilst the majority of respondents support the co-location of facilities which produce renewable energy with waste facilities, the issue of energy from waste gives rise to strong opposition and concern amongst some local stakeholders.

#### **How these views will be reflected in the draft Waste Plan:**

4.20 Current regional, national and international policies encourage plan makers to consider waste as a resource and support the recovery of energy from waste where this cannot be treated further up the waste hierarchy. The

partner boroughs will give further consideration to this issue and develop policies, to be consulted on during July to September 09.

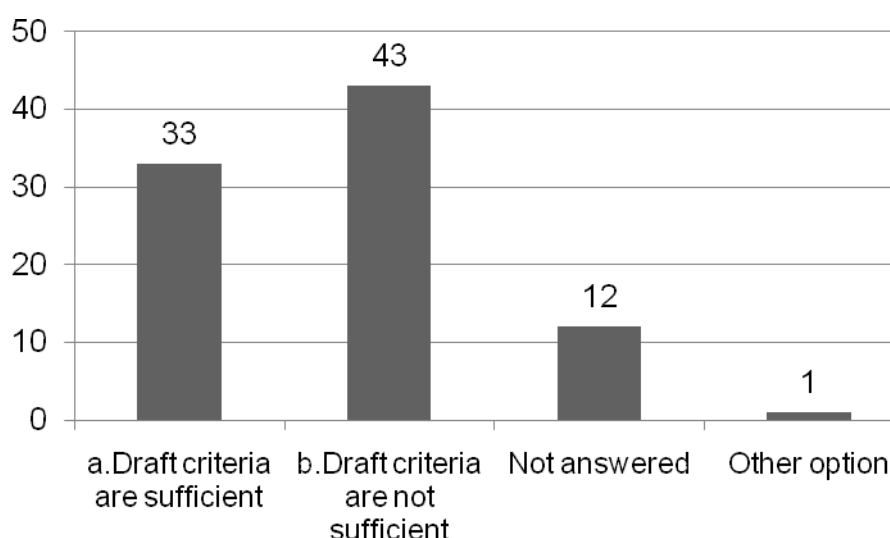
#### Issue Four: Where should the new facilities go?

**Q9 Which criteria should be used to identify sites suitable for waste management facilities?** *This was asked in both the full and short questionnaire and discussed at the workshops.*

**Options:**

- a. The draft locational criteria in Table 6 [of the Issues and Options consultation report] are sufficient
- b. The draft locational criteria in Table 6 are not sufficient.

**Figure 8:** Number of respondents choosing each option for Q9:



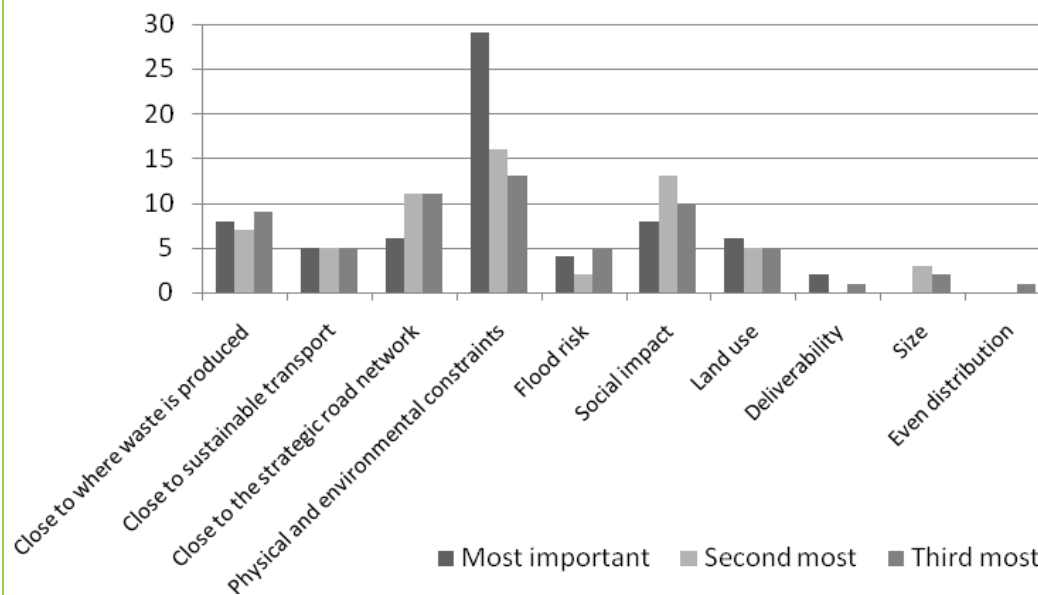
**Response:** Most respondents feel that the draft criteria presented in the consultation document need to be expanded. Suggestions for additional criteria are below.

- Impact on local/regionally important nature conservation areas
- Protection of Metropolitan Open Lane / Green belt
- Site size
- Positive impacts such as provision of jobs
- Deliverability of site, including potential conflict with others seeking land requirements
- Protection of health and well-being
- Impact on local townscapes
- Proximity to energy users
- Air quality
- Transport assessments
- Noise assessments
- Potential drop in house prices
- Type of facility
- Evenly spread throughout the boroughs

- Define what is meant by previously development land
- Site flexibility to adapt to future changing circumstances e.g. adaptation, expansion, co-location, supply of heat / power

**Q10** Of the criteria [presented in the Issues and Options report] which are the most important in assessing whether locations are suitable for waste management? Please list the criterion you think are most important and explain your reasons  
 This was asked in both the full and short questionnaire and discussed at the workshops.

**Figure 9:** Responses to Q10: which are the most important criteria?



**Response:** All criteria occur within respondents' top three most important criteria. Additional criteria of site size, deliverability and a distribution of sites across boroughs also feature. The three criteria deemed *most* important overall are physical and environmental constraints, social impact and proximity to the strategic road network.

### Analysis of response: Local stakeholders

5.1 In the workshops, participants found establishing criteria for waste facilities challenging. Views varied across the four workshops but protecting liveability was an overarching consideration as was sustainable transport of waste. Likewise health concerns were generally very high on the agenda. Criteria setting that made facilities avoid residential areas (except for very small recycling/composting in some instances) were strong themes amongst a number of groups. This feedback is also reflected in the higher proportion of questionnaire responses identifying physical/environmental constraints (which includes proximity to sensitive receptors) and social impact as the most important criteria.

5.2 However, as the graph above shows, *all* draft criteria presented for consultation are believed to have importance. There are no criteria presented in the Issues and Options Consultation Document which are considered unimportant.

5.3 In some workshop groups, the relative importance of criteria was felt to depend on locations. One group at the Kingston workshop suggested that, depending on the site, there should be, *“different ranking and different criteria”*. For example, flooding was thought to matter as a criterion in some places, but much less so where the risk of flooding was lower.

5.4 A number of workshop participants felt the locational decisions about where to site facilities would depend on the type of technologies being contemplated and that different criteria would dominate not only across different sites but also across different types of technology proposed for development.

#### **Analysis of response: Government bodies / National organisations**

5.5 The Environment Agency believes that criteria are site specific and each should be assessed for each site. The GLA has highlighted that energy, noise, air quality and transport impacts should be given adequate consideration within the Waste Plan. The HA are also keen for transport impacts to be considered in the development of waste facilities. In their response, Natural England states that the draft criterion cover the right areas and issues.

#### **Analysis of response: The Waste Management Industry**

5.6 The majority of waste management industry responses cite the need for criteria around ‘deliverability.’ Clearly there is a need to ensure that the Waste Plan is deliverable and the industry are keen that we make an assessment of this for the sites detailed in the draft Waste Plan. As stated by waste management company, Cappagh Group, *“an essential additional criterion is “site availability”. For the plan to be deemed ‘sound’ PPS12 states that it must be deliverable. It states that it must ensure that “partners who are essential to the delivery of the plan such as landowners and developers are signed up to it”*.

5.7 With regard to which are the most important criteria, most waste industry responses have stated that *all* are important. As SITA UK state, *“they [the criteria] should all be considered. It’s likely different sites will have different strengths and weaknesses and a balance will need to be made.”*

5.8 The industry also acknowledges the locational benefits or disadvantages of a site may sometimes not be known until full development and site-specific assessments are completed.

5.9 Site size was raised by two respondents from the waste management industry. However, no threshold for site size was provided and further discussion will be needed with relevant stakeholders on this issue. Clearly there is a link between site size and ambitions to co-locate facilities.

5.10 Two of the waste management respondents suggest that closeness to where waste is produced may not be the most appropriate criterion. As SITA UK states in their response, this criterion assumes that travelling longer distances by road results in higher vehicle emissions than travelling shorter distances. This may not always be the case in future if alternative, low-impact fuels become more widely used. The South London Waste Partnership add that congestion complicates this issue and that travelling shorter, more congested routes by road may result in a greater impact than driving longer uncongested routes with a shorter overall journey time.

### **Main areas of conflict and consensus**

5.11 There is a general consensus that *all* of the draft criteria are important, with local stakeholders being particularly keen to ensure that waste management facilities have no negative impacts on local communities and the environment.

### **How these views will be reflected in the draft Waste Plan**

5.12 The criteria to be used to assess whether locations are suitable for waste management development will be refined, in light of the feedback received.

5.13 Over the coming months, all the ‘broad locations’ identified in the Issues and Options Consultation Document will undergo a thorough assessment. Sites within each broad location will be assessed against each criterion. This will help determine which sites are the *most* suitable for future waste management development. As mentioned previously in the introduction to this report, the results of the next iteration of the Sustainability Appraisal and as assessment of deliverability will also be important in helping identify the most suitable sites.

### **Q11 Are any of the broad locations [identified in the consultation material] particularly suitable or unsuitable for waste management?**

5.14 A number of responses were received, though there is little consistency. As expected, answers to this question tend to be subjective; for example landowners or developers tend to believe their land to be suitable for re-development, whereas residents living close to industrial areas believe these are not be suitable for re-development. The full list of responses can be found in Tables 1 and 2, to follow.

**Q12 Are there any additional locations not identified which you think would be suitable for waste management facilities?**

5.15 A number of responses to this question were received. The full list of suggestions is included as Table 3, to follow. Some suggestions are not suitable (e.g. they are out of the Plan area), whilst others may warrant further investigation.

**Q13 Are any of the broad locations particularly suitable for co-locating waste management facilities with manufacturing from waste industries and/or facilities which provide renewable energy?**

5.16 Responses to this question are listed in Table 4 which follows. A number of responses cite the need to find sites of sufficient space to enable co-location of facilities.

**Table 1:** Sites which respondents believe are particularly **suitable** for waste management facilities

<b>Site</b>	<b>Respondent</b>	<b>Reason provided by respondent</b>
<b>Beddington Farmlands and Lane sites</b> (Broad locations 27, 28, 29, 32)	Croydon resident	Because of their current waste use or because they can be expanded
	Viridor Waste Management (site operator)	The Beddington Farmlands site (27 & 28) is one of the key locations that can deliver the centralised approach outlined in [the Issues and Options consultation document] and has the benefit of being an existing waste management site distant from sensitive landusers.
	Merton resident	Broad locations 27 & 28 (Beddington Farmlands) are suitable because they are away from residential roads and close to the road network
	Sutton resident	Beddington Lane has a site near/opposite Oldfields Road should be considered (no reason given)
	Sutton resident	From my knowledge of the area the area between Beddington Lane and Hackbridge is the only suitable site to take a large thermal or incineration plant.
<b>Benedict's Wharf, Merton</b> (covered by broad location 23)	SITA UK (site owner)	It is an existing waste management facility and a planning application has been submitted to Merton Council for the development of this site to include an anaerobic digestion/in-vessel and a Materials Recycling Facility composting facility.
<b>Factory Lane, Croydon</b> (Broad location 45)	The South London Waste Partnership	It is an existing waste site.
	Croydon Resident	No reason given
<b>Garth Road, Merton</b> (Broad location 25)	The South London Waste Partnership	It is an existing waste site.
<b>Transfer Station at Wimbledon</b>	SITA UK	It is an existing waste site.
<b>Payne's Chocolate Works</b> (Broad location 38)	Croydon resident	No reason given
<b>Purley Oaks</b> (Broad locations 49 &50)	Croydon resident	No reason given

<b>Rainbow Industrial Estate,</b> Merton (Broad location 18)	Rolfe Judd who are planning consultants for the site owner, Workspace Glebe.	It meets all the draft locational criteria cited in the consultation document as issues which need to be considered in locating waste management facilities.
<b>Selhurst Rail depot</b> (Broad location 41)	Croydon resident	No reason given
<b>Tolworth Rail aggregates depot</b> (Broad location 6)	Kingston resident	Because of its size and it is close to the A3
	Surrey County Council	Broad location 6 (Tolworth Rail aggregates depot) promises to fulfil an important role in the supply of construction aggregates to its catchment area which includes part of Surrey. The Waste Plan should ensure that this function, in line with MPS1 and RPG (policies) is not compromised by waste development
	Kingston resident	A second sites should be found in the area of broad location 6 (Tolworth area)
<b>Villiers Road and Fairfield Industrial Estate</b> (Broad location 3)	The South London Waste Partnership	It is an existing waste site.
	Kingston resident	Because the site is existing and should be re-used
<b>Willow Lane industrial estate</b> (covered by broad location 23)	Merton resident	Because it is away from residential roads and close to the road network

**Table 2:** Sites which respondents believe are particularly **unsuitable** for waste management

Site	Respondent	Reason provided
<b>Coulsdon Industrial Area, Marlpit Lane and Ulleswater Crescent</b> (Broad location 55)	The East Coulsdon Residents Association	Unsuitable for a waste transfer station or an incinerator, but a recycling plant would be supported
<b>Gloucester Road Employment Area</b> , Croydon (Broad location 43)	Berkeley Homes	<p>The site is located in a predominantly residential area. This would impact on the residential amenity of the area and impact on the quality of living for those who live, play and work in the vicinity.</p> <p>It is located on a residential road which would not have the capacity to accommodate the envisaged increase in traffic and heavy vehicle movements.</p>
<b>Mitcham</b> (broad locations 11, 13, 14, 15, 17, 20, 22, 23, 24)	Merton resident	All sites around the Mitcham area are unsuitable. Local communities will not be protected. Detrimental impact on local roads.
<b>Northwood Road</b> , Croydon (Broad Location 40)	Berkeley Homes	<p>Site is located in a predominantly residential area and not on the strategic route....[the road] would not be able to accommodate heavy goods vehicular traffic. This would cause detrimental impact on the quality of living for those who live, play and work in the area.</p> <p>The site is in close proximity to Flood Risk Zone. This would increase the risk of contaminating the water course.</p>
<b>Pear tree farm</b> (broad location 54)	Surrey County Council	It's particularly unsuitable because it abuts Green Belt and the Area of Great Landscape value.
<b>Rainbow Industrial Estate</b> , Merton (Broad location 18)	Three Merton ward councilors	<p>There is only one access point at a very narrow point on the bend of a very busy road just by the station.</p> <p>Any extra traffic particularly of large vehicles would add to the already serious traffic problem in this area.</p>
	The Raynes Park and West	The site is close to many houses and will cause traffic problems

	Barnes Residents Association	
	Raynes Park residents	Development will cause pollution and traffic jams in the area
<b>Thornton Road Employment Area</b> , Croydon (Broad Location 42)	Berkeley Homes	<p>The site is located very close to Croydon Metropolitan Centre, Mayday Hospital and residential areas.</p> <p>Although located on a strategic road, this would conflict with existing road use through increasing vehicular traffic.</p> <p>Potential air emissions from a potential facility and additional traffic would be detrimental to the air quality management scheme in the area.</p> <p>This would also impact on the residential amenity in the locality.</p>

**Table 3: Additional sites** which respondents have suggested may be suitable for future waste management facilities:

Borough:	Area of land:	Suggested by:
Croydon	<b>Disused sidings to the east of the main railway south of Norwood Junction</b>	Brethrens Gospel Trust
Kingston	0.8 hectare site south of <b>Silverglades Business Park</b>	The Landowner (Hampshire County Council Pension Fund)
Kingston	The <b>old B&amp;Q and Comet site</b> on the boundary with Merton	Company with clients in the construction industry looking for sites
Kingston	A243 for example where it crosses with B280 road	Kingston resident
Kingston – General comment	The <b>area to the south of Malden Rushett</b> in the RB of Kingston as it is very rural. It is close to the National Grid, but not to other industrial sites.	Sutton resident
Kingston – General comment	<b>land alongside the A3</b> away from residential areas should be investigated	Kingston Residents Association
Kingston	Government site at <b>Tolworth</b>	Kingston Residents Association and two individual

		Kingston Residents
Kingston	Allotments and rarely used playing field on the A3, <b>south of Keswick Avenue,</b>	Kingston Residents Association
Kingston	Land to the <b>north of Worcester Park Road,</b> part of which is derelict industrial land	Kingston Residents Association
Kingston	Land to the <b>north of Lower Marsh Lane</b> and to the South West of Kingston Road which is only partially utilised by the sewerage works.	Kingston Residents Association
Merton	Old BBC sports ground in <b>Motspur Park</b> - close to A3	Kingston resident
Sutton	Areas designated as MOL adjacent to the <b>Beddington Industrial Area and Beddington Farmlands</b>	Waste management/utilities company (Cappagh Group) Stercycle (Waste Management Company)
Merton	Any waste land which is not already designated for other purposes. Can we use old sites which were landfill years ago? e.g. <b>Mitcham Common</b>	Beddington resident
Out of Plan area	The <b>Olympic Village</b> (post-Olympics) and <b>South Norwood Country Park</b> - for composting	Norbury resident
Out of Plan area	Site in <b>Godstone</b> , not far from J6 M25, the site is (up to 50 acres, if required) next to WBB Minerals Ltd, North Park Lane Godstone Surrey RH9 8ND	Sutton resident
Out of Plan area	Land <b>near the M25</b>	Croydon resident

**Table 4:** Sites which respondents have suggested may be **suitable for co-locating facilities:**

Area of land:	Suggested by:	Reason this is suggested:
<b>Metropolitan Open Land</b>	Kingston resident	Likely to have the space needed
<b>Existing waste sites and industrial sites and Strategic Industrial Locations (SILs)</b>	Kingston resident	No reason given
	The Environment Agency	SILs offer the best opportunities for resource efficiencies and industrial symbiosis
	Local resident	No reason given
<b>Beddington Farmlands</b> (Broad locations 27 & 28)	Croydon resident	Established area away from housing
	Croydon resident	No reason given

	Viridor Waste Management	A key waste management site distant from sensitive landusers
	Sutton resident	Good links and large enough for setting up these industries
Areas designated as MOL adjacent to the Beddington Industrial Area and Beddington Farmlands	Cappagh Group	To deliver sites of a suitable size, metropolitan open land may need to be considered.
	Sterecycle (Waste Management Company)	The land is well-placed to accept waste from the four boroughs. An area of MOL has been re-designated as 'industrial' in Sutton's Proposed Submission Core Strategy, there are few residential properties located nearby and the area in is general industrial use so visual intrusion will be limited.
<b>Sites near existing or planned residential areas</b>	Sutton resident	Residences could utilise the heat and power produced.
<b>Tolworth Rail aggregates depot</b> (Broad location 6)	Kingston resident	Because of its [large] size and close proximity to the A3
	Kingston resident	Road and rail links to this site are good
<b>Benedict's Wharf, Merton</b> (covered by broad location 23)	SITA UK (site owner)	The planning application submitted to Merton Council includes provision for electricity generation from the proposed anaerobic digestion process.
<b>Rainbow Industrial Estate, Merton</b> (Broad location 18)	Rolfe Judd (planning consultants for the site owners).	Because it is considered to be a deliverable opportunity to produce electricity from the anaerobic digestion process proposed on this site by Workspace Glebe.
<b>Villiers Road and Fairfield Industrial Estate</b> (Broad location 3)	Kingston resident	If more space can be found onsite
	Kingston Residents Association	No reason given
	Local resident	It's already a successful site
<b>Willow Lane Industrial Estate</b> (covered by broad location 23)	Merton resident	Because the site is already in waste management use
<b>Garth Road, Merton</b> (Broad location 25)	The South London Waste Partnership	It is an existing, large waste management site.

### **How these views will be reflected in the draft Waste Plan**

5.17 All of the 'broad locations' identified in the Issues and Options Consultation Document will undergo a thorough assessment over the coming months. Each site will be assessed against the revised set of draft locational criteria which appeared in the Issues and Options Consultation Document (revised, to take consultation responses into account). This assessment will help determine which sites are the most suitable for future waste management development. An assessment of the deliverability of sites and the conclusions from the Sustainability Appraisal will also help inform the identification of sites.

5.18 The *additional* sites suggested by respondents to the consultation, (identified in table 4) will be included in the sites assessment. However, sites outside the Plan area will not be assessed, since the South London Waste Plan must identify sites within its own boundaries for future waste management use. Comments which don't identify sites, but broad areas of search e.g. 'land along the A3,' 'land south of Malden Rushett' will be considered by the partner boroughs. Where any additional potentially suitable sites can be identified within these very broad areas, these will be assessed.

5.19 The sites considered most suitable within the Plan area for future waste management development will be included in the draft Waste Plan which will be out for consultation from July to September 2009.

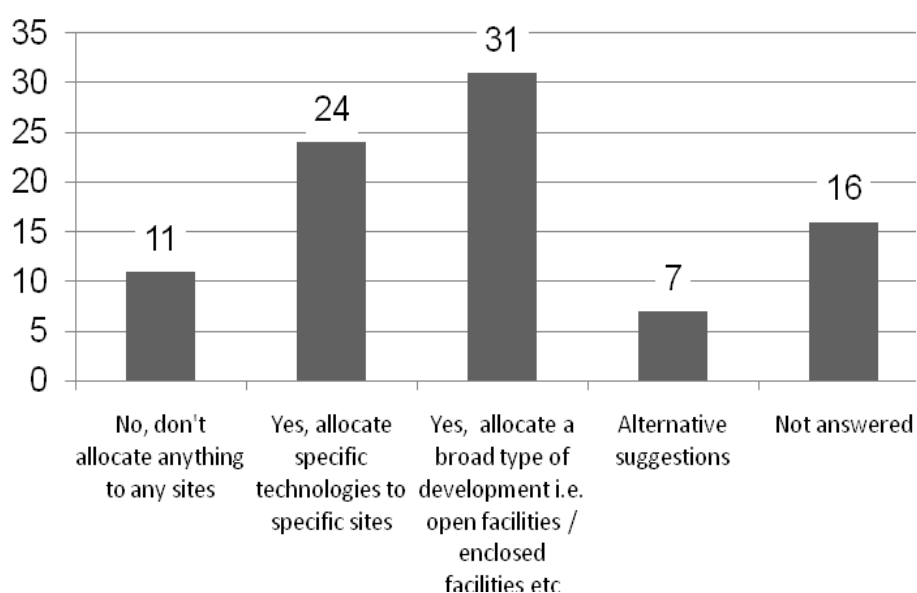
### **Issue Five: Should the South London Waste Plan specify the waste development suitable for each site?**

**Q14** Should the Waste Plan specify what waste development is suitable for each site eventually identified? *This was asked in both the full and short questionnaire and discussed at the workshops.*

#### **Options:**

- a. Don't allocate any technologies or types of facility to any site
- b. Allocate specific technologies to specific sites
- c. Allocate a broad type of facility to specific sites i.e. enclosed facilities, open facilities and enclosed facilities with a chimney. Can you suggest any alternative to this broad range?
- d. None of the above. Can you suggest any alternative options and your reasons for these?

**Figure 10:** Number of respondents choosing each option for Q14



**Response:** The majority of respondents would like the Waste Plan to identify what sort of development is suitable for the sites in some way. Slightly more felt this was more likely to be through identifying broad types of development.

#### **Analysis of response: local stakeholders**

6.1 The vast majority of local stakeholders would like the Waste Plan to identify, in some way, what sort of development would be permitted on sites eventually identified. Although all options were represented amongst the responses from local stakeholders, most would like the Waste Plan to either specify the technologies suitable for each site (e.g. Site X is suitable for an anaerobic digestion facility) or to specify the broad type of development for each site (e.g. site X is suitable for an enclosed facility).

6.2 A smaller number of local stakeholders see the merits of Option A; i.e. not allocating any type of facility or technology to any site. These stakeholders feel that being too specific at this strategic stage may limit our opportunities to take advantage of improved future technologies.

#### **Analysis of response: Government bodies / National organisations**

6.3 Only two statutory consultees provided a response to this question. The EA believes that option C (specifying a broad type of development suitable for each site) would be preferable, whilst the GLA acknowledges that certain technologies have specific locational requirements.

#### **Analysis of response: The Waste Management Industry**

6.4 The Waste Management Industry are keen to maintain flexibility and for the Plan not to be overly prescriptive. Many comments highlight the appropriateness of varying levels of detail at different stages of the planning

process. As a number of industry responses observe, there is a due process involved in the development of waste facilities which starts with the Waste Plan, continuing through to the planning application process. The level of detail becomes more certain and specific throughout this process and the industry generally feels that the *type* of development is best dealt with at the planning application stage when the impacts from a proposal can be properly assessed, together with potential mitigations and public consultation on specific proposals can be undertaken.

6.5 Rolfe Judd further observes that being overly prescriptive may restrict newer, more efficient green technologies from coming forwards.

### **Main areas of conflict and consensus**

6.6 Whilst local stakeholders are generally keen to identify what sort of development is suitable for the sites eventually identified, the waste management industry desire flexibility and believe that the most appropriate place to discuss the detail of proposals is at the planning application stage.

### **How these views will be reflected in the draft Waste Plan:**

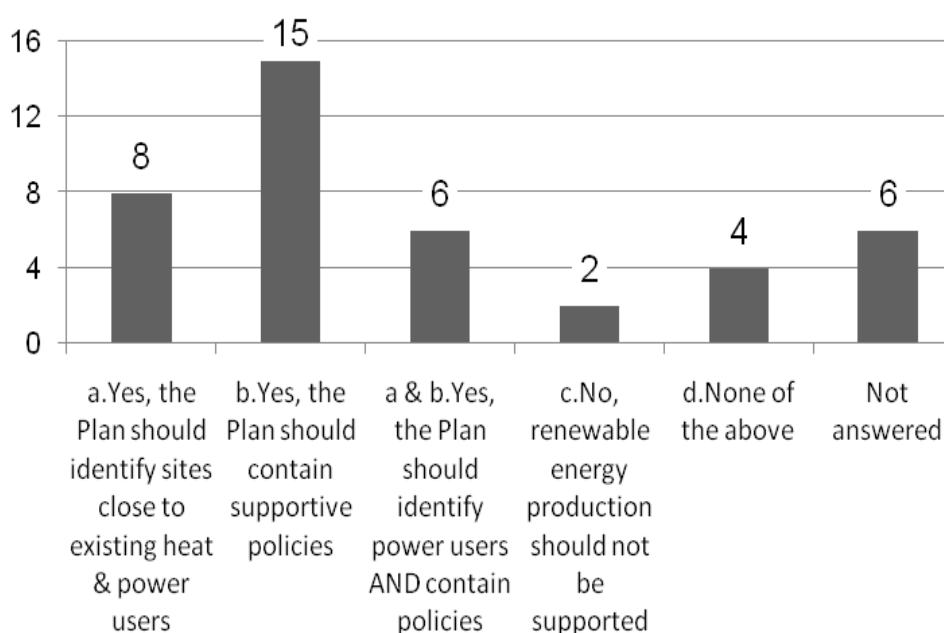
6.7 Further consideration is needed on this aspect of the Plan. National planning guidance (Planning Policy Statement 10: Sustainable Waste Management) requires waste planning authorities to ensure Plans don't stifle innovation which enables waste to be managed further up the waste hierarchy. The partner boroughs will have to reflect on how this can be best achieved whilst also addressing stakeholders' views. Policies around this issue will be developed for consultation from July to September 09.

**Q15 Should the South London Waste Plan support the production of renewable energy from waste management facilities? *This was asked in the full questionnaire.***

#### **Options:**

- a. Yes, the Waste Plan should identify sites which are close to existing heat and power users
- b. Yes, the Waste Plan should identify policies to support the production of onsite renewable energy
- c. No, the Waste Plan should not identify sites or policies to support the production of onsite renewable energy
- d. None of the above. Can you suggest any alternative options and your reasons for these?

**Figure 11:** Number of respondents choosing each option for Q15



**Response:** The majority of respondents believe the Plan should support the production of renewable energy from waste.

#### **Analysis of response: local stakeholders**

6.8 The vast majority of responses from local stakeholders were in favour of the Plan supporting the production of renewable energy from waste. However, there was a minority of responses strongly opposed to production of energy from waste facilities within the Plan area. Both respondents who feel that the Waste Plan should *not* support renewable energy production are local residents opposed to the construction of energy from waste facilities within the Plan area.

#### **Analysis of response: Government bodies / National organisations**

6.9 The EA would like the Waste Plan to contain supportive policies around renewable energy production. They also make the point that renewable energy should not only be considered in the context of existing infrastructure, but also that the Plan should support the development of local networks or stand alone facilities for use off-site. The GLA highlights the London Plan's requirement for the provision of CHP / CCHP to accommodate various waste-related facilities on a single site. The GLA would therefore wish the Waste Plan to highlight sites suitable for CHP / CCHP production and the identification of robust policies to support this.

#### **Analysis of response: The Waste Management Industry**

6.10 The industry responses unanimously agree that the Waste Plan should support the production of renewable energy from waste management facilities and many observe that it would be useful to identify existing infrastructure and

potential energy users within the Plan. One respondent commented that it would also be useful for the Plan to support the potential to provide district heating in new developments.

6.11 Three of the respondents have identified that the supply of heat and power can be complex and the requirement for this should be assessed on a case by case basis to assess whether this is feasible, cost effective or indeed practicable. Thought also needs to go into whether the Plan should support the off-take of fuels to be used elsewhere.

### **Main areas of conflict and consensus**

6.12 There is general consensus across all groups for supporting the production of renewable energy. Whilst the majority of respondents support the co-location of facilities which produce renewable energy with waste facilities, the issue of energy from waste gives rise to strong opposition and concern amongst some local stakeholders.

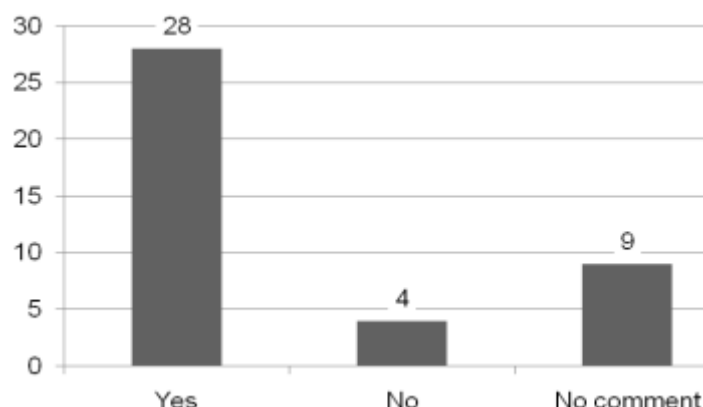
### **How these views will be reflected in the draft Waste Plan:**

6.13 The partner boroughs will need to consider developing appropriate policies around the production of renewable energy, to be included in the draft Waste Plan, out for consultation from July to September 2009.

## **Issue Six: Implementing the Plan**

**Q16 Do you agree with the Plan's draft monitoring indicators? *This question was only asked in the full questionnaire***  
**Options:** Yes or No

**Figure 12:** Number of respondents choosing each option for Q16: Do you agree with the Plan's draft monitoring indicators?



**Response:** Yes. The majority of respondents agree with the monitoring indicators. However, there were a number of suggestions to consider additional indicators, which are summarised overleaf.

**Q17 Would you suggest any changes or additions to the draft monitoring indicators?**

**Responses received:**

- The amount of waste from the Plan area disposed of to landfill
- Air quality; impacts of the facility and traffic impacts
- Proportion of waste recovered and recycled
- Energy generated from facilities
- Carbon impact of the facility
- Amount of households recycling
- Distance waste is being transported
- Proportion of trips by non-road
- Numbers of types of facility within the Plan area
- identification of facilities granted planning permission
- Population growth

**How these views will be reflected in the draft Waste Plan:**

7.1 Suggestions for additional monitoring indicators will be considered and where appropriate, included in the draft Waste Plan, out for consultation in from July to September 09. Some suggested indicators may already be identified in other Council Plans e.g. Local Area Agreements or reports from partners e.g. the Environment Agency who are responsible for monitoring emissions from waste management facilities. Where this is the case, these will be signposted in the draft Waste Plan.

**Q18 Are there any other issues to consider in developing the Waste Plan?**

**Other key issues cited by respondents which are not covered elsewhere in this report:**

- The need to provide more information about waste facilities and combined heat and power, to reduce anxiety amongst local stakeholders
- The need for the Waste Plan to help support business waste and incentivise recycling and composting
- The Waste Plan should also consider the proposed nature and scale of likely facilities
- The Waste Plan should contain discussion of the Plan area's existing landfill capacity and how this will be used during the lifetime of the Waste Plan
- Consideration could be given to direct access for horticulturalists to composting facilities
- The Waste Plan should facilitate good, sustainable design and construction for waste management facilities

- The Waste Plan should contain policies to guide the development of 'windfall sites' i.e. developers may wish, in future, to develop alternative sites which are not allocated in the Waste Plan, to waste use.
- The Waste Plan should consider the movement of waste across the Plan's boundaries.
- Consideration of other future uses of land on industrial sites e.g. the Metropolitan Police Service's representations on
- Consideration of whether the Waste Plan is the appropriate Plan to support wastewater and sewage sludge treatment infrastructure.

**How these views will be reflected in the draft Waste Plan:**

7.2 The above issues will be considered and incorporated into the draft Waste Plan, where appropriate. It may also be necessary to work with Partners to address some of these.

**Summary**

7.3 The response from stakeholders for most issues raised during the consultation is generally mixed. For most issues, further discussion is required with key stakeholders to clarify a way forwards. The work now being progressed to assess each potential site will also help develop the Waste Plan as will further development of the Sustainability Appraisal of the Plan.

7.4 A number of concerns have also been raised, notably around the need to minimise the amount of waste produced in the first instance and health concerns over some treatment types. There are a number of partners involved in the successful delivery of the Waste Plan and as stated in this report, some of these issues are being addressed by Partners and the draft Waste Plan will identify this work. There is also a process to be followed before any development takes place, which includes the planning application process. Some concerns may be more appropriately addressed at the planning application stage, when details of proposals and assessments into their impact are clearer and can be discussed with greater certainty.

**Next steps**

7.5 Work is now underway to assess each site contained within the 'broad locations' identified in the Issues and Options Consultation Document. Additional sites suggested during the consultation will also be assessed. Each site will be assessed against the revised locational criteria identified in the Issues and Options consultation document, which are to be amended in light of feedback from the consultation.

7.6 A further Sustainability Appraisal of the draft Waste Plan and a further Habitats Assessment will also be undertaken over the coming months. Conclusions from both reports will also help inform the Plan's development.