

# South London Waste Plan



## Stage 2 Consultation Report

A summary of the response received to the Stage 2 consultation for the South London Waste Plan: Potential sites and draft policies held between 20<sup>th</sup> July and 16<sup>th</sup> October, 2009.

February 2010  
v. Final

## **Purpose**

1. This report sets out how the boroughs of Croydon, Kingston, Merton and Sutton have engaged with the local community and key stakeholders throughout the development of the Waste Development Plan Document we are jointly preparing.

2. The report sets out the findings of the second stage of consultation which took place over 13 weeks between 20<sup>th</sup> July and 16<sup>th</sup> October 2009 (though a large number of responses were received and considered after this date).

3. The second consultation stage identified a number of potential sites and draft policies about which we sought comment from residents, local businesses, the waste management industry, site owners and occupiers, statutory and government bodies.

4. This report provides a high level summary of the comments received. All comments and initial officer responses are available as an appendix. A similar report was published following the completion of the first consultation stage on 'issues and options' which took place in September and October 2008.<sup>1</sup>

## **The requirement to consult**

5. Section 25 of the Town and Country Planning (Local Development) (England) Regulations 2004 (Regulation 25) requires local planning authorities to ensure that development plan documents (DPDs) are genuinely front-loaded by informally involving communities in the development of issues and alternative options. The regulations state that a variety of community involvement measures should be used in order to encourage a meaningful response based upon a genuine choice of options.

6. Boroughs are also required to ensure that consultation arrangements are in accordance with their adopted Statements of Community Involvement (SCI). Each partner borough involved in the development of the Joint Waste DPD has its own adopted SCI. To ensure a common approach across all boroughs, the greatest requirements in any one SCI have been applied to all boroughs.

7. When the South London Waste Plan is submitted, a Statement of Compliance will be prepared. This will explain how the preparation of the DPD has met the Regulation 25 requirements as well as the requirements of the Statements of Community Involvement. This Statement of Compliance will also need to show how all issues raised by stakeholders have been addressed. This report should be read as an 'interim' statement.

## **Background to the South London Waste Plan**

8. The South London Waste Plan will provide a planning framework for the management of all waste produced in the partner boroughs. It will form part of each borough's Local Development Framework (LDF) and will:

- Contain policies which will be used to assess applications for future waste management facilities within the Plan's area;
- Allocate land to waste management, to guide the future development of waste management facilities, and;
- Specify how delivery of the Waste Plan will be monitored annually.

9. When approved, the Waste Plan will replace the saved waste policies within the partner boroughs' Unitary Development Plan's (UDP).

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<sup>1</sup> This report is available online via <http://southlondonwasteplan.limehouse.co.uk>

### **How we have consulted on the development of the South London Waste Plan**

10. In preparing the South London Waste Plan, the partner boroughs must ensure they are in general conformity with the Regional Spatial Strategy (in this case the Mayor's London Plan) and National Policy. To this end, regular meetings have taken place, and will continue to take place throughout the Plan's development with the Greater London Authority (GLA) and Government Office for London (GOL).

11. In addition, formal consultation activities have taken place to seek views from local residents, businesses, the waste industry, site owners and occupiers and other stakeholders. The first, known as the 'issues and options consultation' took place over a 6 week period in September and October 2008. The second, known as the 'potential sites and policies consultation' took place over a 13 week period from July to October 2009.

### **The first consultation: 'Issues and Options' September – October 2008**

12. The first consultation stage sought comment on a range of issues and options for dealing with these. In line with each borough's Statement of Community Involvement, 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)

13. 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> Each webpage directed users to a Joint consultation portal where users could read documents and respond using the online questionnaires.

14. One evening public workshop was held in each borough during 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 Planning Officers 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

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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. Available to view via <http://southlondonwasteplan.limehouse.co.uk>

<sup>3</sup> 'Consultation on moving away from landfill,' September 2008 published jointly by the boroughs of Croydon, Kingston, Merton and Sutton. Available to view via <http://southlondonwasteplan.limehouse.co.uk>

<sup>4</sup> The South London Waste Plan Technical Report, The Habitats Directive Assessment, The South London Waste Plan Interim Sustainability Appraisal. Available to view via <http://southlondonwasteplan.limehouse.co.uk>

<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)

15. Over 100 stakeholders provided written response to the Issues and Options consultation and in addition, 87 people attended the workshops and provided their views in group discussions. These were captured in a full write-up of the workshops which was made available online following the consultation close.<sup>6</sup>

### **Consultation stage 2: 'Potential sites and Policies' – July to October 2009**

16. The second stage of consultation identified a list of potential sites and a set of draft policies which will be used to assess future applications for waste facilities.

17. The second consultation stage was advertised in the same way as the first; using local press and in borough magazines; all boroughs' websites, display of posters, leaflets and consultation materials (questionnaires) in council main receptions and all libraries. All residents, businesses and other parties on each planning department's Local Development Framework database, as well as those who responded to the issues and options consultation were notified by direct mail.

18. In addition, all boroughs wrote to businesses and residents on and surrounding all potential sites identified in the Stage 2 consultation materials. Unfortunately, the distribution of letters and consultation materials by post was hindered during the consultation period by unplanned strikes by Royal Mail workers which affected most of the country for a number of days. However, residents were able to pick documents up from their local libraries and council main receptions.

19. This second consultation stage received wider coverage in the local press which also helped to ensure residents were aware of the consultation and how they could get involved.

20. Each borough also held an evening drop-in workshop during September 2009 to enable residents to find out more about the development of the Waste Plan, provide feedback about the potential sites and draft policies and ask specific questions. The workshops were well attended, with 214 attendees across the Plan area. A full write-up of these workshops is available as Appendix 1 to this report.

21. As for the first stage of consultation, all consultation materials and press releases encouraged community groups to invite us to attend their meetings to talk further about the Plan. Planning officers attended all meetings we were invited to and a list of these is shown in Table 1.

**Table 1:** List of local meetings which were attended by waste planning officers during the potential sites and policies consultation

#### **Croydon:**

- Selsdon Residents Association
- Sanderstead, Croham, Selsdon and Ballards Neighbourhood Meeting
- The Addiscombe, Woodside and Ashburton Neighbourhood Meeting
- The Broad Green and Waddon Neighbourhood Meeting
- Addington Residents' Association Committee

#### **Kingston:**

- Chessington District Residents Association
- The Hawkes Road Residents Association
- The Maldens and Coombes Neighbourhood Meeting
- The Surbiton Neighbourhood Meeting
- The Kingston Town Centre Neighbourhood Meeting
- The South of the Borough Neighbourhood Forum
- Transition Town Kingston
- The Malden Rushett Residents Association
- Three meetings with local residents in the south of the borough in Tolworth and Chessington

<sup>6</sup> This report is available to view via <http://southlondonwasteplan.limehouse.co.uk>

**Merton:**

- The Willow Lane Industrial Estate BID group,
- Wimbledon Park Residents Association
- The Mitcham Society
- The Morden Community Forum
- The Raynes Park Community Forum
- The Wimbledon Community Forum
- The Mitcham Community Forum
- Colliers Wood Community Forum
- The Mitcham Partnership
- The Wimbledon Society
- The Raynes Park Association
- Merton Sustainable Communities and Transport Partnership and the Environment sub-group of this Partnership
- Morden Industrial Area (South Wimbledon Business Area BID Group)
- Longthornton Redevelopment Working Party

**Sutton:**

- Information provided at the Carshalton Environment Fair
- KIPPA BID (Business group on the Kimpton Industrial Estate)
- Beddington and Wallington Local Committee
- Local Authorities Along the Wandle
- Beddington Farm Bird Group

22. Over 1200 responses have been received to the potential sites and policies consultation from a wide range of stakeholders. Some responses were individual's views, whilst some represent much larger organisations such as residents groups and local environmental organisations including local Friends of the Earth and Green Party groups. Responses were also received from government bodies (e.g. the Environment Agency, the Greater London Authority, the Highways Authority, English Heritage, Government Office for London). A number of responses were also received from waste management companies. Full details of all respondents and their comments can be found at Appendix 2, alongside initial officer comments.

23. 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.

24. The remainder of this report presents an analysis of the response to the consultation questionnaire. Feedback received through written comments or points made at the workshops are incorporated throughout this report. Two appendices are available to this report:

- **Appendix 1** is the write up from the four public workshops held during the consultation period, and;
- **Appendix 2** contains *all* comments received in response to the potential sites and policies consultation, along with initial officer comments. Please note that this is a large document and will be made available online at <http://southlondonwasteplan.limehouse.co.uk>, in local libraries and from the Project Manager.

**Thanks to all of you who responded to the Stage 2 consultation on potential sites and policies for the South London Waste Plan.**

## Comments on potential sites

**Q) Do you have any comments about any of the potential sites?** *This question was asked in both the full and short questionnaire and at workshops. Views were also provided by letter and Email. Comments received are discussed below*

25. This report summarises the main objections and support received for the various potential sites consulted on. All detailed responses to the consultation can be found in Appendix 2.

### Feedback from Government bodies

26. All industrial estates and existing waste sites are supported by the Greater London Authority (GLA), because these are consistent with London Plan Policy 4A.27 (Broad locations suitable for recycling and waste treatment facilities) which identifies strategic employment locations, local employment areas and existing waste management sites as the broad locations suitable for recycling and waste treatment facilities. On this basis, the GLA has objected to a number of potential sites which fall outside of these categories of land.

27. The EA has identified a number of sites which would benefit from improvements, which, in some cases could be incorporated into the development of sites. They also identify development constraints for particular sites and potential mitigation, e.g. *“a drain runs adjacent to [Chessington Industrial Estate, Kingston] so there should be no development within 5m of the top of its bank.”* In their response, the EA has also identified those sites which are particularly important species habitats and where mitigation measures must be included in any site redevelopment.

28. The EA has also objected to potential sites which fall within flood zone 3b (sites within the functional floodplain). Some industrial estates and existing waste sites fall within this flood zone. In developing the South London Waste Plan, it was considered that redevelopment of these sites could provide opportunities for improvements to surface water drainage and sustainable drainage systems. Further discussion on this issue will be needed with the EA.

29. Objections to sites from statutory bodies are listed below:

Site	Site description	Borough	Objector	Main reasons for objections
99	Purley Oaks Highways Depot	Croydon	EA	The site has a large pond and recorded populations of stag beetle (a protected species) as well as Kingfisher and common frog
47	Land at the junction of Kingston Road / Jubilee Way	Kingston	GLA	The borough's Unitary Development Plan (UDP) identifies this as suitable for hotel or recreation use and the consideration of this site is contrary to London Plan Policy 4A.27 (Broad locations suitable for recycling and waste treatment facilities)
124	Former Government Offices, Hook Rise South	Kingston	GLA	The borough's UDP identifies this as suitable for housing and is acknowledged by the GLA to be an important housing site for the borough. Consideration of this site is also contrary to London Plan Policy 4A.27 (Broad locations suitable for recycling and waste treatment facilities)
41	Kingston Road, Tolworth Aggregates	Kingston	Surrey County Council	This rail aggregate depots serves an important function for the import of construction materials into London and parts

	depot south of the railway			of Surrey. The continuation of this site as an aggregates depot is supported <sup>7</sup>
22/69	Willow Lane Industrial Estate, (including the B Nebbett & Son site)	Merton	EA	The site is in flood zone 3b
651	Part of the Plough Lane Industrial Estate	Merton	EA	Site is in flood zone 3b
75	Burlington Road west site junction with A3	Merton	EA	Site is in flood zone 3b <sup>8</sup>
57	Land to the West of Beddington Lane	Sutton	GLA	It is designated Metropolitan Open Land which is protected by London Plan policies 3D.10 ('Metropolitan Open Land') which states that boroughs should maintain a presumption against inappropriate development of MOL and that essential facilities for appropriate uses will only be acceptable where they do not have an adverse impact on the openness of MOL; and Policy 3D.14 ('Biodiversity and nature conservation') which expects London boroughs to give strong protection to Sites of Metropolitan Importance (SMI) for nature conservation). The GLA states that further reasoning and justification demonstrating why this is required will be needed if it is to be considered further

30. The Highways Agency did not provide site-specific comments in their consultation response, but in general seek to promote strategies and land allocations which support alternatives to the private car. However, they note that whilst desirable, the transport of waste by rail is often not feasible due to costs associated with providing access to the waste site and source by rail.

31. The HA supports the consideration of the proximity to the strategic road network which was included in the site assessment work carried out to date. However, they feel that at present, there is insufficient information relating to each site for them to be able to provide guidance as to whether they are suitable or not.

### Feedback from residents

32. Local stakeholders objected to and supported a number of sites (though with greater numbers objecting to sites than supporting them). These are summarised in Tables 1 and 2, found at the end of this section on sites comments. All comments received can be viewed in Appendix 2.

<sup>7</sup> This site is identified in the consultation document as a site with possible delivery constraints (the site is unavailable within the lifetime of the Plan: it is occupied by London Buses, London Concrete and Day Aggregates who are on 25 year leases).

<sup>8</sup> This site is identified in the consultation document as a site with possible delivery constraints (the site is no longer available; a B&Q retail outlet has recently been built onsite).

33. Although residents and some local businesses objected to a wide range of the potential sites, the reasons cited were very common. The key concerns raised by local residents in objection to sites were:

- Additional traffic on already congested roads
- Traffic impact on residential amenity
- Traffic impact on air quality
- Traffic impact on road safety (particularly where schools, playing fields, residential areas are located close by)
- Close proximity to residential properties
- Fear of air pollution from any facility
- Fear of water pollution from any facility (e.g. on the Wandle River and Hogsmill Rivers)
- Fear of increased noise from any facility
- Fear of smells from any facility
- Fear of visual intrusion and a general reduction in residential amenity
- Fear of what might be built onsite
- Fear of health impacts (particularly for those who suffer from respiratory problems e.g. asthma)
- Concern about the loss of jobs
- Some concern about impact of development on existing businesses

34. A small number of residents did indicate support for some sites. The key reasons given by local stakeholders in support of the consideration of sites for waste management facilities are:

- The site is already in waste use
- The site is not too close to residents
- In accepting that we need to move from landfill and treat waste more sustainably, some residents have identified sites which they consider the 'least worst'
- Support energy from waste where it would bring local benefits (of heat and power)

35. As Table 2 shows (found at the end of this section on potential sites comments), much of the support for particular sites comes from residents in other boroughs. This 'Not In My Backyard' (NIMBY) attitude is common when planning new development sites and is played out at a neighbourhood level as well as a borough level.

36. It is clear from the consultation responses that whilst most residents can understand the need for new waste management facilities, the majority do not recognise any benefits for them individually, or for their local community. As one Merton resident noted, *"It will undermine the community and be a potential hazard to users of the town and residents whilst bringing almost nothing positive in return."* A common concern amongst residents across all boroughs was also the perceived negative impact on property values.

37. Most residents feel that the development of waste facilities should be away from residential areas, schools, playing fields and most supported the principle of developing existing sites rather than new sites near residents, *"In principle I would suggest you consider improving or enlarging existing sites first."* (Kingston resident). *"Viewed in context with the other proposals...I feel that it would be far more appropriate to utilise fully the existing larger industrial sites and sites that already carry out significant waste disposal..."* (Merton resident). *"It is appreciated that finding a suitable site must be a difficult problem to solve, but I am hoping one could be located which would not have such a big environmental impact for everybody."* (Merton resident).

38. The lack of information about what will be built on site was a common complaint at the workshops, residents' meetings and in written responses. Some residents found it difficult to comment on the suitability of sites without knowing what was going to be developed on the site. As one residents' group noted in their response, *"As we are, as yet, unaware of the nature of waste management processes being considered for individual sites it is a little difficult to spell out why the meeting felt the sites were inappropriate."* (Neighbourhood Partnership, Croydon).

39. On this issue, the GLA stated in their response that, *"the GLA does not expect Borough's to specify specific technologies within their Waste Development Plan Documents. The GLA's*

position is moving towards being technology neutral and is more concerned with carbon outcomes.” The Government Office for London consider the approach (of not identifying what will be built on sites) as being consistent with policy requirements. The NHS also supports the consideration of technologies on specific sites on a case by case basis. Further consideration on this matter will be needed.

### Feedback from the industry

40. The industry and some site owners responded in support of a number of sites:

Site	Site description	Borough	Supporter	Main reasons for support
1	Factory Lane waste transfer station	Croydon	Resources from Waste Veolia RPS Group Planning SLWP (site owner) <sup>9</sup>	In existing waste use, preliminary studies (on utilities, ecology, transport opportunities and constraints, contaminated land, visual intrusion, air quality and bio-aerosol risk and flood risk) have show there to be no barriers to the development of this site. They are an established part of the local environment.
6	Villiers Road waste transfer station	Kingston	Resources from Waste Veolia RPS Group Planning SLWP (site owner)	In existing waste use, consistent with London Plan policies, good access to the strategic road network, consistent with London Plan policies, preliminary studies (on utilities, ecology, transport opportunities and constraints, contaminated land, visual intrusion, air quality and bio-aerosol risk and flood risk) have show there to be no barriers to the development of this site. They are an established part of the local environment.
9	Garth Road civic amenity sites & transfer station	Merton	Resources from Waste Veolia SLWP (site owner)	In existing waste use, consistent with London Plan policies, preliminary studies (on utilities, ecology, transport opportunities and constraints, contaminated land, visual intrusion, air quality and bio-aerosol risk and flood risk) have show there to be no barriers to the development of this site. They are an established part of the local environment.
126	Benedicts Wharf	Merton	SITA (site operator)	In existing waste use, not being used to its maximum potential, consistent with London Plan policies, adjacent to a proposed low carbon zone which will provide 1000 dwellings, potential to provide heat and power
60	Rainbow Park Industrial Estate	Merton	Rolfe Judd (on behalf of site owner)	The site is suitable and is supported in principle by key stakeholders
98	Waste Transfer Station site, Endeavour Way <sup>10</sup>	Sutton	Veolia	Site is in existing waste use and is within the Beddington Farmlands Industrial area

<sup>9</sup> The South London Waste Partnership (SLWP) is the joint body comprising the waste disposal functions of the boroughs of Croydon, Kingston, Merton and Sutton.

<sup>10</sup> This site is identified in Appendix 8 of the Potential Sites Technical Report published alongside the Stage 2 consultation documents. It was not identified as a key consultation site because it is less than 1 ha in size.

18	Existing waste site, Beddington Farmlands	Sutton	Viridor (site operator)	In existing waste use, close to the A236, potential to be connected to the rail network
57	Land west of Beddington Lane	Sutton	Sterecycle  London Remade (on behalf of site owner)  Resources from waste	Suitably large site size, single ownership, support from the site owner, central location
491	Land to the north of Minden Road, Kimpton Industrial Estate	Sutton	Valad Property Group (on behalf of site owner)	The site is zoned for industrial use and may have potential. Valad has identified that some parts of this site would not be suitable because of existing premises onsite.
512	Land at the Hackbridge Trading Estate	Sutton	CMA Planning (on behalf of landowner, City and Provincial and partner, 777 Group, waste operator)	Site is currently designated for employment uses in the Adopted Sutton UDP, a number of the existing buildings are coming towards the end of their economic life and a significant amount of floorspace is vacant or only suitable for <i>ad hoc</i> storage, proposed facility (pyrolysis) would supply low carbon electricity (and heat) in a manner that would fully respond to guidance contained in the recently published draft London Plan (October 2009) by achieving 'self-sufficiency' in the South London Waste Plan area, whilst also offering a significant opportunity to realise the vision of Hackbridge becoming a 'zero-carbon' suburb.

### New sites

#### Q) Do you know of any other sites which could be suitable for the development of waste management facilities? *This was asked in both the full and short questionnaires*

41. In the consultation documents, stakeholders were asked whether there are any further sites which should be considered in the development of the Waste DPD.

42. A number of new sites were suggested from a range of stakeholders. Some suggestions (e.g. the former government offices at Tolworth, Kingston) were also raised at the previous Issues and Options consultation stage and have already been investigated.<sup>11</sup> Other suggestions were not site-specific e.g. “*any surplus Thames Water land at the Hogsmill and Beddington Farmlands...*” (Resources from Waste, waste operator).

43. However, a number of specific sites, which have not previously been considered in the development of the South London Waste Plan were suggested. These are identified below:

Site description	Borough	Supporter	Key reasons for support (full details can be found in Appendix 2)
Land west of Hawkfirst Road, another of	Croydon	Landowner (Private individual)	Suitable for a composting facility which would be screened by the surrounding woodland. It is away from densely populated areas and close to

<sup>11</sup> In the case of the former Government offices, Kingston, this site was identified in the consultation documentation as having deliverability constraints (it is recognised as a key housing site in the borough’s Unitary Development Plan). The GLA also recognises this site as important for delivering housing.

Longwood Road, Kenley			the strategic road network (A24, M25, A22)
Open area of land adjacent to Chessington Garden centre	Kingston	Resident	None given
Land to the south of Silverglade Business Park	Kingston	Turley Associates (Planning consultants on behalf of landowner)	Possible extension opportunity to the existing Silverglade site
Land at the Hogsmill Valley	Kingston	Thames Water (land owner)	The wider site already has an established waste water treatment use, close to Villiers Road, Kingston's emerging Core Strategy proposes to identify the Hogsmill Sewage Treatment Works as an existing Major Developed Site in MOL.
Former gravel extraction works sites (the old Cemex site) Beddington Farmlands	Sutton	Viridor (waste operator)	Site is brownfield, adjacent to existing waste operations on Beddington Farmlands, not within any national/international policy designation, not within Flood Zone 3b, development would be set back from Beddington lane (so less likely to cause visual intrusion), site is in proximity to the proposed Mitcham Low-Carbon Zone in Merton and also the proposed Hackbridge Sustainable Suburb and has potential to deliver a Combined Heat and Power (CHP) solution to support for such developments (which is in accordance with the London Mayor's aspirations to enhance locally generated energy across the capita), site is central to the source of waste arisings.
Wimbledon Greyhound stadium	Merton	Local resident	it is further away from non flat housing than site 651 [Plough Lane Industrial Estate] and clearly has better road access and is an underused site ...assume the site could be purchased cheaply and is very extensive in area.
Land to the North West of Jessop's Way, Beddington	Sutton	London Remade (on behalf of waste operator, Cappagh, and land owners, Ferncombe Properties)	The lack of openness of the MOL at the site by virtue of the topography, bund, screening and natural tree cover screening; the historic use of the site for mineral extraction and as sewage sludge beds; the existing permitted use on the site; <ul style="list-style-type: none"> <li>· the ability of the owner to mitigate environmental problems;</li> <li>· the importance of the proposed use in helping meet the Government's aims for sustainable use of natural resources and energy generation;</li> </ul> the potential to allocate a significant area of the south and west boundaries of the site to landscaping that would provide a natural and sympathetic transition from the MOL to the waste facility.

#### Main areas of conflict and consensus

44. There is little consensus on the suitability of sites at this stage of the Plan's development.

45. There is also a conflict in opinion between local stakeholders and government bodies on the issue of identifying activities taking place on site. Whilst local residents wish to have greater certainty about what will be built on each site, GOL, the GLA and the NHS support the Plan's approach to date which is not to identify specific technologies on sites. Although they haven't commented on the approach to describing (or not) the activities to take place on site, in their response, the EA has identified particular opportunities and constraints for a number of sites e.g. *"The Hogsmill River runs adjacent to [site 6, Villiers Road] giving the potential for improvement works...improvements to the buffer zone could be incorporated to improve the river corridor."* This issue of how far the South London Waste Plan should describe the activity to take place on each site was previously raised with stakeholders during the issues and options consultation. At that time, whilst local stakeholders are generally keen to identify what sort of development is suitable for the sites eventually identified, the waste management industry desired flexibility and believes that the most appropriate place to discuss the detail of proposals is at the planning application stage. This is an issue which needs further consideration.

46. There is, however, consensus across most stakeholders that further work must be completed to identify the most suitable sites for locating waste management facilities. Traffic impact is key issue which has been raised by residents as well as the Highways Agency and will certainly need further investigation.

47. There is also consensus amongst local stakeholders on a range of issues and potential impacts which need greater consideration.

**Table 2: Summary of objections to sites.** Note: All responses can be viewed in Appendix 2, which will be made available on <http://southlondonwasteplan.limehouse.co.uk> and in libraries

Site	Site description	Borough	Nos. of objections at time of publication*	Main reasons for objections
102	Purley Way	Croydon	5	Concerns about: water pollution, air pollution, traffic increases on already congested roads, close proximity to residents
1, 105, 125	Factory Lane sites	Croydon	28	Concerned about water and air pollution, traffic increases on already congested roads, road safety issues, close proximity to residents, noise pollution, the site is also next to the Wandle Valley Park and there would be negative impacts for local wildlife and people enjoying the park
99	Purley Oaks Highways Depot	Croydon	10	Want to retain the sites' current use to enable residents to bring their waste and recyclables, high density residential area, the existing site has dangerous traffic access problems at peak times, too small for redevelopment and constrained by high ground to the east, the large pond onsite has recorded populations of stag beetle (protected species), Kingfisher and common frog.
104	Purley Park, Lombard Business Park	Croydon	3	Being used to a good purpose already - agree with deliverability constraints identified, Purley way sites are all contaminated
5	Pear Tree Farm	Croydon	2	Current operations are outside current permissions and causing nuisance, unsuitable access road
6	Villiers Road	Kingston	26	Concerns about: water pollution (on Hogsmill), air pollution, traffic impact on residential streets, noise impact, local road are unsuitable for heavy vehicles and are too narrow; Villiers Road is already being damaged, vibrations from vehicles damaging homes, traffic safety, smell, close proximity to residents, site is small, in the heart of a residential area, close to two primary schools and a secondary school, bordered by Metropolitan Open Land, considered unsuitable even for its existing use

\* These figures summarise the written responses received by 25<sup>th</sup> November 2009

351, 352, 353	Chessington	Kingston	446	Concerns about creating traffic problems in Malden Rushett, this is a industrial estate not compatible with heavier uses , close to residents, school, close to playgrounds, close to health clinic, close to shops, Tolworth roundabout is already gridlocked, health hazard for local community, highly residential area, recent Tesco application highlighted traffic congestion problems here, concerns about vermin, substantial increase in HGVs, HGVs getting lost/stuck on unsuitable roads, additional housing on the former government site (which is considered inevitable) will increase traffic further, residential roads and schools surround the estate and would suffer from increased noise, smell, pollution and traffic, concerned about loss of employment on the site (which currently employs several hundred people), already high levels of pollution at the Tolworth roundabout and Hook Rise South, Hook Rise South is very narrow and unsuitable for HGVs, site occupier (Eskmuir Properties Ltd) objects
47	Land at junction of Kingston Road / Jubilee Way	Kingston	416	Concerns about creating traffic problems in Malden Rushett, concerns about the loss of the community bike project (a unique facility for local young people), next to a nature reserve, next to a new play area which the Council has built (encouraging young people to play there), problems with air pollution (caused by traffic on the A3) would be made worse, recent Tesco application highlighted traffic congestion problems here, it's not a previously developed site, it's a small area of land, at weekends during football season there is parking all along the roads and will create problems for access, concerns about smells in summer from the facility, a school has just been built at Garrison lane, site is identified in the UDP as suitable for hotel and recreation
124	Former Government Offices, Hook Rise South	Kingston	1	This is an important site for housing (note: this is identified as having deliverability constraints in the consultation document because the borough acknowledges its importance as a site for new housing).
41	Kingston Road, Tolworth Aggregates	Kingston	1	This is an important site for the import of aggregates into London and Surrey (note: this is identified as having deliverability constraints in the consultation document because the borough acknowledges that the site is not available: the existing occupiers are on long leases).
45	Barwell Business Park	Kingston	1	Surrey CC concerned about increased traffic through Epsom Town Centre where HGV traffic is already an issue.

36	Area South of Malden Rushett	Kingston	1	Surrey CC doesn't support a loss of Green Belt or encroachment into the Chessington/Epsom/Leatherhead/Oxshott Gap. Also concerned about increased HGVs through Epsom Town Centre, proximity to Epsom Common SSSI and Local Nature Reserve in Surrey, and more importantly the Ashted Common SSSI and National Nature Reserve in Surrey which contains over 2,300 rare pollarded oaks which are of great conservation importance.
46	Coal depot, Garrison Lane	Kingston	53	Concerns about traffic problems in Malden Rushett, congestion on already congested roads (e.g. Leatherhead Road already congested, site is next to 2 primary schools and a secondary school, close to residential properties, access road is narrow, safety concerns from increased HGVs, planning permission has already recently been given to three schemes on Leatherhead Road which will increase congestion, concerned about impact (smells, pollution and traffic) on the adjacent open space and Sir Francis Barker Ground (used by the Chessington cricket and sports club), concerned about the additional noise of rail if waste were to be moved by rail, Residents in Chessington, Hook, Malden Rushett already suffer from extremely poor air quality caused by excessive traffic on the A243 and resident notes that it is documented that Chessington and Malden Rushett has one of the highest instances of asthma, chest complaints and breathing problems caused by pollution. Concerned about more pollution and damaging health effects, site is directly opposite Chessington South Railway Station and adjacent to the newly constructed Chessington Community College and densely populated housing estate in Garrison Lane, memories of illegal landfill and high volumes of trucks going into Rushett Farm, driving at dangerous speeds, spraying mud all up over the verges and parked vehicles, concerned about the monitoring and control of such facilities, highly congested roads in the summer because of Chessington World of Adventures; people might be put off visiting this theme park because of waste development, plants may be affected in the Chessington Garden centre,
60	Rainbow Park	Merton	135	Close proximity to residential areas, primary school, playing fields, mainline station (Raynes Park), site is within a town centre and residential area. Concerns about: visual intrusion, sound vibrations, traffic impact on already congested area and town centre, access to the station, road safety, air quality, health impacts, loss of jobs onsite, Residents feel it is a small site with poor vehicle access. It is viewed as a negative development which would impair efforts to improve the town centre which the council has recently invested in (e.g. the Lantern Theatre, improvements to the station, several plans for new housing in the town centre, new housing development/supermarket on the other side of the rail tracks from the site)
9	Garth Road	Merton	4	Additional traffic on already congested roads, access road is narrow and not designed for heavy vehicles, vibrations in homes from passing heavy traffic, concerned about pollution, it's a residential area, query the scoring on proximity to the strategic road network

136	Deer Park Road	Merton	31	Visual intrusion, traffic congestion, next to Dean City Farm (a facility for children), concerned about loss of employment - this site currently provides c. 50-80 jobs, too close to housing, too close to a school, the area has really improved and this will harm the area, close to morden park, traffic calming was needed on Liberty avenue, concerned about noise and additional traffic, concerned about increase noise for the animals of Dean City Farm, increased vehicles in surrounding residential roads, health concerns, adjacent to the River Wandle which should be an asset to the area and improved as a nature / scenic walk; Objection from CTL Components PLC (an occupier) who state that the site encompasses live businesses with surrounding roads being heavily used by the existing traffic. Additional traffic with large rubbish trucks would congest the area even further, observation that Merton Council has been engaged in improving the area (e.g. "Lombard Road – Streets for People" project) and the idea of a waste site seems to go against these efforts
73	Bushey Road industrial area	Merton	3	This site is identified in the consultation document as having deliverability constraints. The respondents agree with deliverability constraints identified
751	Burlington Road	Merton	5	This site is identified in the consultation document as having deliverability constraints. The respondents agree with deliverability constraints identified
22	Willow Lane B Nebbett site	Merton	27	Adjacent to residential properties on Carshalton Road, gardens back onto the site, Environmental Health are already in dispute with Nebbett & Sons due to relentless high levels of noise from the onsite crusher, traffic is already heavily congested particularly on Carshalton and Goat Roads, safety issue (accidents are already an issue), access roads are unsuitable for HGVs and recently on Drake Road, an HGV knocked down a lamppost, large number of elderly residents, only 0.5 miles from the Hackbridge landfill site which smells in warm weather, this is a deprived area of Merton,
126	Benedicts Wharf	Merton	9	Concerns about traffic, conservation areas surrounding the site, too close to residential areas
69/127	Willow Lane	Merton	7	Concerned about loss of employment on this site which must be safeguarded, the site is in flood zone 3b (the functional floodplain)

642	Dunsford Road, area east of Weir Road	Merton	19	Mostly occupied, residential properties close by, roads are already congested
702	Garth Road whole are	Merton	10	Residential properties close by,
651	Plough Lane (area of)	Merton	85	<p>Low score, traffic impact, visual intrusion, very close to new buildings on corner of Weir Road and Plough Lane, concerned about loss of employment - this site currently provides c. 50-80 jobs, &lt;100m from residents on Chaucer Way, Plough Lane, Kingsley Road, Kohat Road and Havelock Road (technical report is incorrect on the scoring for proximity to residential properties), site is within 200m of Garfield Primary School and Priory School in Queens Road is close by, concerns about potential smells, concerns about additional noise, within 40m of Wandle Meadows Nature Park, the Wandle River and Wandle Trail which have been designated a Local Nature Reserve and would be compromised, Technical report is incorrect to state that it is not close to open areas (it is close to the allotments at Havelock Rd and Garfield Rec, Lambeth cemetery is close by, site is within 400m of St. George's hospital, surrounding roads already suffer from extreme congestion at almost all times of the day and especially at peak hours, the Council has spent alot of money improving the wider area (Abbey Mills, Dean City Farm etc), surely this is contrary to that? Herons and Kingfisher now live by the river and fish stocks have improved, have had problems in the past with chemicals being washed into the river, close proximity of a waste site to the river would surely increase the risk of river pollution, health impacts (also compounding existing problems such as allergies, asthma ), site occupier (Manheim Auctions Limited - car auctions co) objects to the site being considered since it would negatively impact on the amenity of their business, which is attended by the public, possible noise from the facility disrupting teaching in the school during the day, possible odours, dust and other waste being distributed from the facility across the open space and coming into the school grounds, concerns about increased traffic, Plough Lane is already a very busy road and junction, and could not easily sustain more traffic. Moreover, the knock-on effect of more traffic and congestion in Plough Lane would mean more traffic diverting nearer the school, the Wandle Trail is a major cycle route (National Cycle Network 20) and amenity of this would be negatively affected by waste development, the NCN route has a crossing at Plough Lane which already is a risk to cyclists. More heavy vehicles would make this worse and is not consistent with national policy on increasing accessibility and safety of cycling, the site is in flood zone 3b (the functional floodplain)</p>

75	Burlington Road, west side junction with A3	Merton	1	This site is in flood zone 3b (the functional floodplain) (note: this is identified as unavailable in the consultation document: a B&Q retail outlet has recently been built onsite).
641	Dunsford Road, area east of Weir Road	Merton	11	Concerns about development resulting in unacceptable traffic congestion in the area, too close to residential areas, inconsistent with Merton's strategic aim to develop the Wandle Valley Park and the existing wildlife and recreational sanctuary around the River Wandle. Traffic, Plough Lane (B235) and Durnsford Road (A218) already suffer from heavy traffic volumes, except at certain times of the day, resulting in lengthy tailbacks. This heavy traffic was central to the rejection of the Safeway application for a superstore on the old Plough Lane football ground site and the subsequent approval for high density housing was conditional on the junction being widened; something that can not be repeated.
96	George Killoughery Ltd	Merton	1	Site is too close to homes, congestion is already an issues and concerned about potential noise and litter.
17	Country Skip	Sutton	2*	The Beddington Lane area is already over industrialised. There are too many heavy goods vehicles accessing this area on a daily basis. The area is filthy and the smell from the existing landfill site and the sewage treatment works that can travel quite far is horrendous. Also see the notes for all Beddington Lane / Farmland sites below. * This site was also raised by a numerous residents in the Sutton workshop held in September 09 as being unsuitable.
491	Kimpton Industrial Estate, Land North of Minden Road	Sutton	5	Schools are nearby, screening would be needed

492	Kimpton Industrial Estate, Land East of Kimpton Road	Sutton	1	None given
	Beddington Lane / Farmland sites	Sutton	73	Beddington and Mitcham area of opportunity identifies this area as needing more lakes, concerned about water and air pollution, traffic increases on already congested roads, the wider area is primarily residential, concerns that Beddington has become a dumping ground, Beddington Lane is already suffering from congestion, air pollution (residents note that it went over the WHO safe limits on 288 days in 2008), concerns about the increase of respiratory problems over recent years and this would be exacerbated, noise, the road itself is not suitable for heavy vehicles and is damaged (was never designed as a major road), volume of traffic is a danger for cyclists and pedestrians, already smells from the sewage works and this would increase, impact on local ecology, area of national importance for Tree Sparrows and at least 150 bird species (including migrating raptors and nationally scarce species such as Honey Buzzards), sea rise puts all low lying areas (including wandle valley) at risk of flooding in future, negative impact on existing businesses in the area
18	Viridor site	Sutton	9	This is an area of wet grassland, Metropolitan Open land and a Site of Nature Conservation Importance, although it is recognised that some of this land has already been built on. These designations should be respected and their review should be undertaken through biodiversity planning procedures and not degraded by proposed development through other planning mechanisms. In addition, there is a very real possibility that future development of Beddington Sewage Treatment Works will be necessary to better process effluent to comply with new water quality standards which will be required under the Water Framework Directive and so, as part of a strategic and holistic approach to planning in this area, Site 18 should not be included amongst the proposed waste sites.
21	777 Demolition	Sutton	1	No reasons provided

57	Land west of Beddington Lane	Sutton	13	57: As for Site 18, development of site 57 (land west of Beddington Lane) would be wholly unacceptable. This area also includes Metropolitan Open Land and Site of Nature Conservation Importance designations (which are protected by the London Plan) and which we strongly think should be respected and reviewed through biodiversity planning procedures and not degraded by proposed development through other planning mechanisms. Again, there is a very real possibility that future development of Beddington Sewage Treatment Works will be necessary to better process effluent to comply with new water quality standards which will be required under the Water Framework Directive and so, as part of a strategic and holistic approach to planning in this area, this site should not be included amongst the proposed waste sites.
97	Sevenside waste paper	Sutton	3	Concerned about water and air pollution, traffic increases on already congested roads, the wider area is primarily residential, Purley way sites are all contaminated,
100	EMR, Beddington Lane	Sutton	3	Concerned about water and air pollution, traffic increases on already congested roads, the wider area is primarily residential, Purley way sites are all contaminated,

**Table 3: Numbers of supporters for each site and key reason. All responses can be viewed in Appendix 2**

Site	Site description	Borough	Nos. of supporters at time of publication*	Main reasons for support
102	Purley Way	Croydon	8	It is important not to take land that is currently recreational open space; this site follows this principle. Sites seem reasonable as its already used for industry or waste disposal, site is located away from residents, site is large
99	Purley Oaks Highways Depot	Croydon	5	Some parts appear to have potential, not much residential nearby, perhaps a possibility to access the site by rail?
1	Factory Lane	Croydon	12	Existing industrial site, has a high score and shows potential for redevelopment, little housing or recreation areas within the immediate vicinity, proximity to waste arisings, good access to the strategic road network, the fact that it is in existing waste use and is available and consistent with London Plan Policy 4A.23 which describes the broad locations suitable for the development waste facilities on London
105	Factory Lane	Croydon	9	Suitable because it has a high score and shows potential for redevelopment, potential for expansion from Site 1, suitably wide access roads (though some residential nearby), it's a large site
125	Factory Lane	Croydon	9	Existing industrial area, has a high score and shows potential for redevelopment, rail access potentially possible (though near a park).
116	Highways Depot and Offices	Croydon	1	Part of the Factory Lane industrial estate and adjacent to a larger site being considered (site no. 125)
6	Villiers Road	Kingston	23	Existing waste site, though only suitable if there is no increase in traffic, feel that its location near to the busiest economic hub of the borough will encourage responsible disposal of recycling materials and residual waste, might be more appropriate (than Chessington Industrial Estate), proximity to waste arisings, good access to the strategic road network, the fact that it is in existing waste use and is available and consistent with London Plan Policy 4A.23 which describes the broad locations suitable for the development waste facilities on London.
46	Coal depot	Kingston	12	Not too close to residential areas, better access than Villiers Road, is the furthest site from residents, only suitable if there is no increase in traffic, might be more appropriate than Chessington Industrial Estate
351/ 352/	Chessington	Kingston	12	Show some potential in parts, better access than Villiers Road

\* These figures summarise the written responses received by 25<sup>th</sup> November 2009

Site	Site description	Borough	Nos. of supporters at time of publication*	Main reasons for support
353				
47	Land at junction of Kingston Road / Jubilee Way	Kingston	13	Not close to resident, better access than Villiers Road, is the furthest site from residents, only suitable if there is no increase in traffic, it would lead to loss of a community bike facility (negative comment), entry could be in Jubilee Way
123	Kingston Waste Water Treatment Works	Kingston	3	Potential synergies with the waste water treatment site, this site together with the existing waste site would provide an opportunity to treat the waste collected at the Villiers Road site next door without additional vehicle movements (Chessington resident)
22	Willow Lane B Nebbett site	Merton	9	Existing waste site, existing waste site/industrial land.
126	Benedicts Wharf	Merton	8	Already a waste site, the site is not being used to its maximum potential, it can be redeveloped to use the land more efficiently, move the management of wastes up the waste hierarchy and has sufficient area to allow for the co-location of different types of waste facilities, development can reduce the traffic flows to a site, it is understood that a low carbon zone is to be established adjacent to the site (approximately 1,000 buildings). The proximity of this to the site should be considered positively in terms of regeneration because of the potential for renewable energy and heat off take from more sustainable waste management proposals.
69	Willow Lane	Merton	10	Not close to residents, existing waste site/industrial land.
127	Willow Lane	Merton	10	Not many houses nearby
60	Rainbow Park	Merton	6	Suitable and appropriate within this urban area (on amenity, health & safety and highways grounds), benefits include energy, heat and hot water provided directly to the local network, redevelopment will be an improvement on the existing site
9	Garth Road	Merton	13	Extending the existing Garth Road facility which is a true industrial estate is a better option (than Rainbow Park), it is away from residential areas, existing waste site/industrial land.
136	Deer Park Road	Merton	1	Few houses in close proximity
641	Dunsford Road, area east of Weir Road	Merton	10	Not many houses nearby, develop existing facilities on this site, existing waste site/industrial land.

Site	Site description	Borough	Nos. of supporters at time of publication*	Main reasons for support
642	Dunsford Road, area east of Weir Road	Merton	8	Partly suitable (the northern half: the southern half is too close to residential properties)
702	Garth Road whole are	Merton	6	No reasons given
651	Plough Lane (area of)	Merton	3	Not many houses nearby, existing waste site/industrial land
17	Country Skip	Sutton	6	its already used, seems well-run, not much residential nearby
491	Kimpton Industrial Estate, Land North of Minden Road	Sutton	6	Some parts appear to have potential, it is largely undeveloped and meets the following criteria: Minimum site area of 2Ha (5 acres), suitable planning use, good road access and proximity to trunk road network; absence of (or adequate separation from) sensitive receptors (in particular residential housing), adjacent land uses offering opportunities for CHP off-take
	Beddington Lane / Farmland sites		8	Agree, but the road systems needs attention, redevelopment is an opportunity to create a very pleasant area for the people of Beddington rather than the awful condition that much of the area is in at the moment; no housing nearby
18	Viridor site	Sutton	7	Existing waste use, not much residential nearby, close to strategic road network, the potential to be connected by rail
21	777 Demolition	Sutton	5	Not much residential nearby, already in waste use
57	Land west of Beddington Lane	Sutton	9	not much residential nearby, already in waste use, there is interest from developers (it is deliverable), The site forms a natural extension of the existing developed area to the south, the proposed use with associated landscaping would form an appropriate transition from the existing industrial development to the south and the MOL land to the north; the existing appearance of the site, which is contained within a palisade fence and has the appearance of an industrial site awaiting development; the importance of the proposed use in helping meet the Government's aims for sustainable use of natural resources and energy generation; the site is bounded by busy Beddington Lane to the east, an access road to the north and an existing commercial property on the south. Development of this site would enable a landscaped screen to be planted on the north and west boundaries that would provide a more appropriate border for the rest of the MOL, synergies with waste water treatment sites .

Site	Site description	Borough	Nos. of supporters at time of publication*	Main reasons for support
97	Severnside waste paper	Sutton	6	not much residential nearby, already in waste use, it's a large site
100	EMR, Beddington Lane	Sutton	5	not much residential nearby, already in waste use
5312	Beddington Lane	Sutton	3	Some parts appear to have potential
534	Beddington Lane	Sutton	4	Some parts appear to have potential
535	Beddington Lane	Sutton	3	Some parts appear to have potential
539	Beddington Lane	Sutton	4	Some parts appear to have potential
98	Waste transfer site, Endeavour Way	Sutton	1	In existing waste use and in the Beddington Industrial Area

## **Comments on the Proposed Policies**

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48. In considering the evidence base accumulated so far (including responses to the issues and options consultation, regional and national policy), seven proposed policies have been developed. It is the policies which set out the requirements which all future proposals for waste development facilities must meet and comments were sought on the following proposed policies during the Stage 2 consultation.

**WP1:** The strategic approach

**WP2:** Encouraging waste minimisation

**WP3:** Safeguarding existing waste management facilities

**WP4:** Identifying proposed waste management sites

**WP5:** Managing the development of waste management facilities on unallocated sites

**WP6:** Development criteria

**WP7:** Sustainable, modern energy recovery

49. Generally, the number of respondents providing specific comments on policies was low, with most respondents, particularly local residents, more focused on providing feedback on sites.

50. Specific comments on policies were received from the following government bodies: the Government Office for London (GOL), Greater London Authority (GLA), Transport for London (TfL), the Highways Authority (HA), Environment Agency (EA), the National Health Service Healthy Urban Development Unit (NHS HUDU) and the South East England Partnership Board.

51. Regional bodies responding to policies to note are Surrey County Council (the adjoining local authority) and the Local Authorities Along the Wandle (group of local authorities responsible for development along the Wandle).

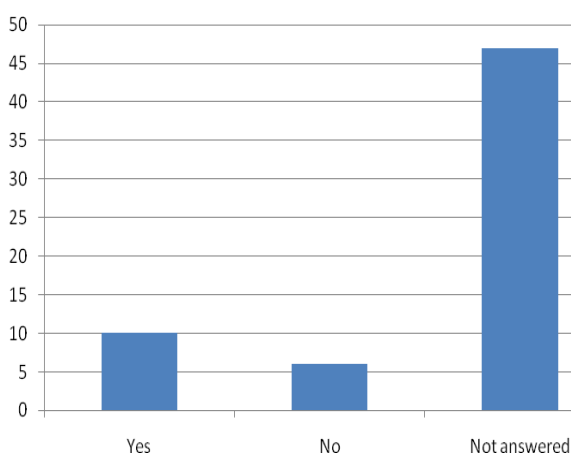
52. Although very few individual residents and local businesses made specific comments on the proposed policies, a number of local residents associations (which can represent large numbers of residents) *did* provide comments. These include the Raynes Park and West Barnes Residents Association (Merton), the Chessington District Residents Association (Kingston) and the Residents Association of West Wimbledon (Merton), Mitcham Village Residents Association (Merton), the Apostles Residents Association (Kingston), Garth Road Residents Association (Merton), The Sutton and Cheam Society (Sutton), Ecolocal (Sutton), the Sutton Group Wildlife Trust, Beddington Bird Farm Group (Sutton), Sustainable Merton, Kingston Friends of the Earth and Kingston Against Incineration Network and Croydon Friends of the Earth. A number of comments were also received from residents at the four public workshops and in meetings with local residents groups. As shown in the previous section, residents also raised a number of issues of concern in their discussion of sites. Key issues raised in these forums are included in this section of the report, to provide a holistic view of all comments received.

53. As the principle delivery agents of waste management facilities, the waste industry's comments on policies are also important. Responses were received from Viridor (waste operator), SITA (waste operator), Veolia (waste operator), RPS Group (on behalf of Waste Resources Group, waste operator), CMA Planning (on behalf of City and Provincial, the landowner in partnership with waste operator 777 Group), London Remade (on behalf of waste operators Cappagh and landowner, Ferndown Properties), Sterecycle (waste operator) and Rolfe Judd (planning consultants, on behalf of the landowner and waste operator) and the partner boroughs themselves under their waste disposal function, operating as South London Waste Partnership

## Proposed Policy WP1: The strategic approach:

**Do you agree with Proposed Policy WP1?** *This question was only asked in the full questionnaire.*

**Options:** Yes or No



**Response:** Only 16 respondents answered this question. 10 agree with the policy, 6 do not (for the reasons set out below).

## Do you have any comments on the proposed policy, supporting text of monitoring regime?

*This question was asked in both the full and short questionnaire and at workshops. Views were also provided by letter and Email. Comments received are discussed below*

### Views from government bodies

54. All government bodies support the principle of the proposed policy, with the following suggestions for amendments / improvements:

- Make the policy more locally distinctive, robust and measurable (this applies to all policies and is not repeated throughout the report)
- In the accompanying evidence base, identify the sites which currently manage hazardous waste in the partner boroughs and their current capacity
- Update the waste forecasts for all waste streams<sup>12</sup>
- Update the existing capacity to treat waste within the Plan area
- Identify the existing landfill capacity within the Plan area in the accompanying evidence base
- Consider the implications of the EA's current permitting review on the Plan area's existing capacity<sup>13</sup>
- Give greater consideration to the cross boundary movement of waste
- Identify what currently occurs with the treatment of clinical waste

### Views from residents and local businesses

55. Residents' comments on this proposed policy covered a wide range of issues which are listed below.

- Re-use and the reduction of waste should be a key component of the Plan – linked to questioning the Plan's current Vision and Objectives view, "*waste as a resource*"
- Welcome the Plan's flexible approach. However, the Plan must be sufficiently flexible to respond to decreasing levels of waste production
- Welcome the wording around "*safeguarding communities and the environment*"

<sup>12</sup> As part of the current review of the London Plan, the GLA will publish new waste forecasts for C&I and MSW wastes. The EA also has updated waste arisings figures for hazardous waste.

<sup>13</sup> The EA anticipates that their permitting review will be published in March 2010.

- Request for stronger controls in this policy to ensure that waste is managed as high up the waste hierarchy as possible
- Make sure the most efficient facilities possible are built
- Question the language used which is very positive. Request that consideration should be given to moderating the language of the policies e.g. *favourably consider proposals for this additional waste management capacity...*” (this applies to all policies and is not repeated throughout this report)
- Request to clarify what agricultural waste means
- Request to make links to other policies and particularly highlight the need for proposals to also satisfy proposed policies WP4, WP6 and if the facility is a thermal treatment facility, WP7
- Concerns about where the waste will be coming from; don't want to import waste from long distances.
- Croydon should seek to have the principles on waste which it set out in its Croydon Environment and Climate Change Strategy 2009-11

56. A frequent concern cited from residents is that they feel the Plan is currently weak on addressing waste minimisation. The waste forecasts were questioned (i.e. shouldn't they be going down?) and residents repeated concerns about the proliferation of plastic bags (a concern raised previously during the issues and options consultation).

57. Residents are concerned that, once facilities are built, there is an incentive for the waste industry to encourage waste production (to maintain their facility and profits). Fears of long terms contracts creating a dis-incentive to reduce waste and the role of thermal treatment facilities crowding out recycling were raised. Some felt the Plan ought to identify binding targets on waste minimisation. There was also concern that all partner boroughs must be making equal efforts to recycle and minimise waste; residents' pride in borough recycling rates was raised at meetings and residents thought it unfair to have to be supporting other boroughs who weren't making progress on recycling and waste minimisation.

58. On the issue of recycling and of some technologies (e.g. some thermal treatment processes) residents requested a stronger commitment to managing waste as far up the waste hierarchy as possible. Although a commitment to managing waste in line with the waste hierarchy is identified in the Plan's Objective 2 and Proposed Policy 1, some residents identified a concern with the language of the Proposed Policy 1 (which requests waste to be managed, “as high up the waste hierarchy as practically possible..”) and the lack of drivers to ensure that waste is managed up the hierarchy. Some residents commented that the current financial drivers to reduce the amount of waste going to landfill (the landfill tax<sup>14</sup> and landfill allowance trading schemes) only seek to reduce the amount of waste sent to landfill and don't necessarily address the need to recycle waste above thermal treatment. It is also thought that these schemes will stop at some point.

### **Views from the Industry**

59. The industry is generally supportive of this policy. Comments are listed below.

- Support the ambition of going beyond the apportionment and aiming for self-sufficiency. However, this needs to be further clarified in the policy and supporting text.
- The issue of the cross-boundary movement of waste (which is inevitable) needs to be clarified
- Request to remove the word, 'sufficient' from the beginning of policy which currently reads, “Sufficient planning permissions to meet the apportionment requirements of the London Plan

<sup>14</sup> To encourage the diversion of waste from landfill and increase recycling, the Government has imposed a tax on active wastes (those that give off emissions) going to landfill. This is a tax which waste producers pay, on top of the usual disposal costs of waste. In his 2007 Budget, the Chancellor announced that landfill tax would rise by £8 per tonne until at least 2010/11. Landfill tax is currently £32 per tonne, set to rise to £40 per tonne in 2009/10 and £48 per tonne in 2010/11. Find out from DEFRA at <http://www.defra.gov.uk/environment/waste/strategy/factsheets/landfilltax.htm>

and go beyond this and seek to maximise self-sufficiency in managing the waste generated by the four boroughs.” (on the basis that more applications need to be lodged and not all will get permission).

- Specifically identify wood as a waste stream which is identified as a priority material for action in the Waste Strategy for England 2007
- Review the assumed land requirements identified in Table 1.3 of the consultation document which is used in the calculation to identify how much land needs to be allocated to waste management facilities
- The policy states that development will be encouraged on the most suitable sites which will be eventually identified in proposed policy WP4. However, this precludes existing waste sites which will be identified in proposed policy WP3. This needs clarification.
- The phrase “manage waste as high up the waste hierarchy as practically possible” may inhibit the development of otherwise accepted waste treatment facilities and it should be reviewed.

### Main areas of conflict and consensus

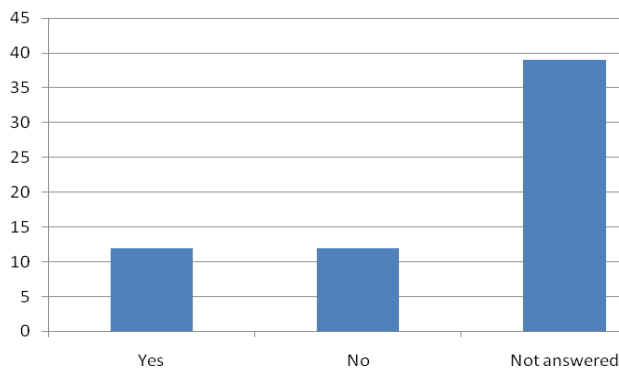
60. All agreed that greater clarity is needed on the issue of cross-boundary movement of waste. Whilst some residents seemed to instinctively dislike the notion of waste being imported from surrounding areas and treated within the partner boroughs, it is recognised by the industry that this is a natural feature of waste management.

61. There is also agreement across local stakeholders and government bodies that the waste forecasts for waste streams needs to be reviewed.

### Proposed Policy 2: Waste minimisation

**Do you agree with Proposed Policy WP2?** *This question was only asked in the full questionnaire.*

**Options:** Yes or No



**Response:** Only 24 respondents answered this question. 12 agree with the policy, 12 do not (for the reasons set out below).

### Do you have any comments on the proposed policy, supporting text of monitoring regime?

*This question was asked in both the full and short questionnaire and at workshops. Views were also provided by letter and Email. Comments received are discussed below*

#### Views from government bodies

62. All government bodies support the principle of the proposed policy, with the following suggestions for amendments / improvements:

- Welcome the reference to movements of construction materials and wastes by non-road (e.g. rail or water) and this should be a key selection criteria
- Note that the policy focuses on the construction industry, but there are also other initiatives to support waste reduction e.g. the London Mayor’s Green Procurement Code and the

### Views from residents and local businesses

63. Local stakeholders' comments on this policy are set out below:

- The policy is weak on promoting waste minimisation and should actively encourage greater waste minimisation. More consideration should be given to this policy and its monitoring regime
- The policy should make it clear whether all 7 criteria listed need to be satisfied by any proposal (this applies to all policies and is not repeated throughout this report)
- The same standards should apply as for other construction projects
- The re-use of existing buildings and its fixtures and fittings, rather than their demolition and scrap should be an initial priority
- Request that consideration is given to conserving the use of water in construction projects and in whichever process is used.
- Request that the point made (in the text of the consultation document) to secure space in new dwellings for storage of recyclables is picked up in the policies
- No mention of asbestos in construction wastes
- Strengthen the language e.g. phrases like "wherever possible" are too vague should be more positive. There ought to be more "sticks" and less "carrots" in the policies (general point to be applied to all policies and is not repeated throughout this report)

64. A strong view, (as previously identified) is local residents' views that waste minimisation should be central to the Plan and is not yet adequately addressed in the Plan's emerging policies. Although the consultation document identifies that the reduction of packaging wastes is being dealt with at a national scale and that the boroughs' emerging joint Municipal Waste Management Strategy is best placed to tackle this issue, some respondents that this is not adequate justification for not tackling this issue in the Waste DPD. *"An attempt to shrug-off a primary responsibility to narrowly focussed national agencies like WRAP and BREEAM is not acceptable."* (Sustainable Merton).

65. Residents see local authorities as leaders for reducing waste locally and encourage local authorities to use their wide range of powers to reduce waste produced in the first instance. Ideas suggested include lobbying central government bodies to tackle this issue, implementing local plastic bag tax, reduce packaging through the work of Trading Standards teams<sup>15</sup>. However, others do recognise the difficulties of addressing waste minimisation within the Waste Plan, *"This is an area which needs to be addressed, although by government rather than local authorities"* (Croydon resident").

### Views from the Industry

66. industry comments on this policy are set out below:

- The requirement to meet BREEAM 'excellent' rating proposed in Policy WP2 is unduly stringent and may be unrealistic for all waste facilities. The proposed policy already requires developers to meet the London Mayor's Sustainable Design and Construction Supplementary Planning Guidance which requires a design and access statement which is considered sufficient. Meeting BREEAM will lead to additional costs and care must be taken not to stifle the development of new facilities (and to encourage their use).
- The 'waste minimisation' policy deals with other aspects (e.g. movement of waste by non-road means) which is confusing.
- Bullet 1) refers to a development meeting 'best practice' guidance. This is considered too ambiguous and needs clarifying.
- The points made at bullets 3), 4) and 5) are very similar (all support the minimisation and sustainable management of waste during construction) and could be condensed.

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<sup>15</sup> Under the Sustainable Communities Act, local authorities now have the power to put pressure on Government to require companies (particularly those who local authorities procure goods from), to reduce packaging.

- At bullet point 7) it is identified that it may not be possible for all resources in the development of waste management facilities to be used efficiently for their lifecycle impacts to be reduced. It will depend on the material and it is suggested that the words, “wherever practicable” are added.
- Clarification is needed on what ‘major developments’ are (identified in the justifying text)

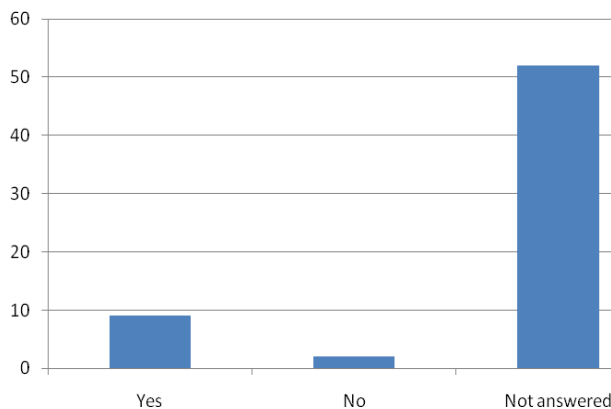
### Main areas of conflict and consensus

67. A wide range of very different issues have been identified, principally by the waste industry respondents and local stakeholders. One issue of conflict identified in the responses to this policy is that whilst residents would like to see stronger wording of the policies, the industry, presumably from experience, have identified areas within the policies where they would like to see caveats introduced in the wording. This is an inevitable conflict in the development of policies to guide development which is delivered primarily by the private sector. It is the role of the local authorities, with guidance from government bodies, to ensure that right balance of interests is maintained in the policies.

### Proposed Policy 3: Safeguarding existing waste sites

**Do you agree with Proposed Policy WP3?** *This question was only asked in the full questionnaire.*

**Options:** Yes or No



**Response:** Only 11 respondents answered this question. 9 agree with the policy, 2 do not (for the reasons set out below).

### Do you have any comments on the proposed policy, supporting text of monitoring regime?

*This question was asked in both the full and short questionnaire and at workshops. Views were also provided by letter and Email. Comments received are discussed below*

#### Views from government bodies

68. All government bodies support the principle of the proposed policy, with the following suggestions for amendments / improvements:

- A plan of existing waste sites will is needed in the next version of the Plan
- Identify that any compensatory site will be required to deal with at least the equivalent quantity of waste, to ensure conformity with the Mayor’s London Plan
- The NHS suggests that a specific reference should be made to the need to safeguard clinical waste facilities
- The EA comments that understanding throughput of facilities is extremely difficult, and suggests that in monitoring the Plan, there may be opportunities to improve data collection and understanding of existing treatment throughput

#### Views from residents and local businesses

69. Local stakeholders’ comments on this policy are set out below:

- The policy should identify that any development on compensatory sites must meet the policies within the Plan
- By safeguarding existing waste sites and requiring compensatory provision if any are lost, the policy doesn't cater for any reduction in waste arisings and a reduction in the number of waste sites actually needed to manage the Plan area's waste
- Some existing waste sites are not suitably located in modern society and shouldn't be safeguarded
- The wording seems to allow uncontrolled development on the sites which will be listed. The language should be altered to reflect the fact that policy tests will need to be met.

### Views from the Industry

70. The industry supports this policy, with the additional comments set out below:

- For clarity, a list of existing sites and a plan of these should be included
- Clarification is needed on whether these sites are preferred for development ahead of new sites
- Clarity is needed on the suitability of existing sites to contribute to the sustainable waste management strategy
- Clarification is needed on what is meant by '*existing permitted level of use*'
- Consideration should be given in this policy to the London Plan requirement to ensure that sites are not prejudiced by nearby development

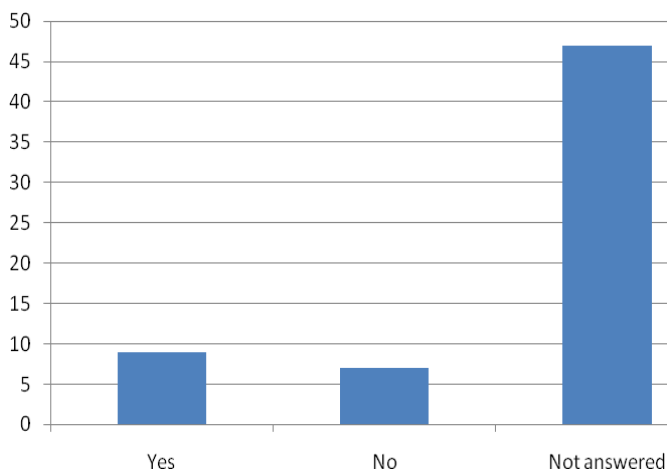
### Main areas of conflict and consensus

71. It was generally agreed that a list and plan of existing waste sites to be safeguarded will be needed in the final version of the Plan.

### Proposed Policy 4: Proposed sites for new waste management facilities

**Do you agree with Proposed Policy WP4?** *This question was only asked in the full questionnaire.*

**Options:** Yes or No



**Response:** Only 16 respondents answered this question. 9 agree with the policy, 7 do not (for the reasons set out below).

### Do you have any comments on the proposed policy, supporting text of monitoring regime?

*This question was asked in both the full and short questionnaire and at workshops. Views were also provided by letter and Email. Comments received are discussed below*

### Views from government bodies

72. All government bodies support the principle of the proposed policy, with the following suggestions for amendments / improvements:

- A plan of allocated waste sites will is needed in the next version of the Plan. If wider areas of search are also included in the final plan, these should also be shown on a map base.
- The GLA would support these criteria identified in Policy WP5 being re-iterated in Policy WP4 to identify that the proposed sites which will eventually be identified in this policy have already been considered against a broad range of criteria.
- Suggestion that the policy also refers to ensuring that existing recovery rates are not compromised when an existing waste site is re-developed for waste management use
- Suggestion that the policy may benefit from clarification on how compensatory sites will be provided if an existing waste facility use is lost.
- Suggestion that the policy would benefit from identifying that any proposals must also meet tests within the other policies within the Plan.
- The EA identify that in some cases, the redevelopment of existing waste sites (where waste is treated further up the waste hierarchy) will result in a lower throughput onsite. The EA suggests this needs consideration.
- The EA suggests that further clarification is needed in respect to flood risk, groundwater protection and local nature conservation

### Views from residents and local businesses

73. Local stakeholders' comments on this policy are set out below:

- The justifying text should identify the process by which sites have been selected
- Clarification is needed on where the compensatory site provision would be. It is suggested that the Plan should allocate sufficient sites that additional compensatory sites are not needed.
- The plan should identify constraints for each site
- The wording seems to allow uncontrolled development on the sites which will be listed. The language should be altered to reflect the fact that policy tests will need to be met.

### Views from the Industry

74. The industry supports this policy, with the additional comments set out below:

- Add reference in this policy to Metropolitan Open Land (MOL) and Planning Policy Statement 10 which states that in developing waste plans, local authorities should *:"protect green belts but recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications, that these locational needs, together with the wider environmental and economic benefits of sustainable waste management, are material considerations that should be given significant weight in determining whether proposals should be given planning permission"*<sup>16</sup>
- A suggestion that it would provide greater clarity if Proposed Policy WP3 deals with existing waste sites (and identifies their developmental potential), whilst Proposed policy WP4 to deal with new sites.
- Clarity is needed on the term, *"waste management facilities"* and should be clarified for the avoidance of doubt
- The redevelopment of waste transfer stations to waste treatment facilities may actually lead to a decrease in the quantity of waste being dealt with. The respondent requests that consideration should be given to making an exception for sites being redeveloped from transfer to treatment.
- The policy should identify that the other policy tests within the Waste DPD need to be met

### Main areas of conflict and consensus

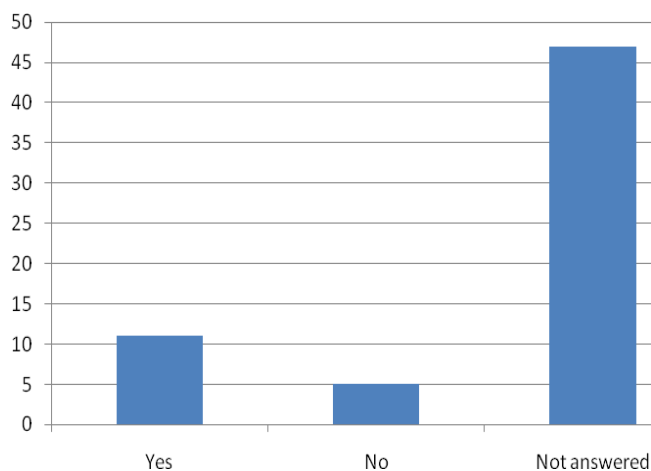
75. The EA and some industry representatives have identified that further consideration should be given to the redevelopment of some existing waste sites, perhaps existing waste sites in particular.

<sup>16</sup> Insert paragraph reference to PPS10 here

### Proposed Policy 5: Waste related development on unallocated sites

**Do you agree with Proposed Policy WP5?** *This question was only asked in the full questionnaire.*

**Options:** Yes or No



**Response:** Only 16 respondents answered this question. 11 agree with the policy, 5 do not (for the reasons set out below).

### Do you have any comments on the proposed policy, supporting text of monitoring regime?

*This question was asked in both the full and short questionnaire and at workshops. Views were also provided by letter and Email. Comments received are discussed below*

#### Views from government bodies

76. All government bodies support the principle of the proposed policy, with the following suggestions for amendments / improvements:

- TfL welcome the priority given to sites where materials entering / leaving the site can be transported by rail or other sustainable means
- TfL and the HA recommend the inclusion of a criteria which supports sites which staff can easily access by cycling and walking
- The NHS welcomes the supporting text which states that the development of waste facilities should not endanger human health and encourage strengthening the wording in bullet 3) of this policy
- The NHS recommend ensuring that all development are based on need

#### Views from residents and local businesses

77. Local stakeholders' comments on this policy are set out below:

- Protection should be given to sites of metropolitan importance and other locally important nature conservation areas
- Protection should also be extended to protect any location which supports locally, nationally or internationally protected species (e.g. land around nature conservation areas which is often very important to species).
- More detailed monitoring indicators are needed to assess impacts of development of people, the environment and natural resources.
- The list of criteria within this policy needs to be extended to cover all the issues which have been considered in identifying suitable sites e.g. include proximity to residential areas, impact on visual amenity, distance from local nature conservation areas
- The policy should states that the views of local people will be taken into consideration
- The policy should ensure that development is not close to where people live and work
- The policy should give greater protection for green belt, open land
- Greater consideration is needed about traffic impacts; the suitability of the roads / road safety issues as well as the proximity to the strategic road network
- The policy should consider the risk of flooding in future as well as current flood risk

- Clarification of the term, “*sustainable transport*” is needed

78. Whilst comments were received in support of greater protection to local nature conservation areas, green belt, open land protected, comments were also received to ensure that development is further from local people which tend to be in such open areas.

### Views from the Industry

79. The industry supports this policy, with the additional comments set out below:

- Welcome the flexibility which this policy provides
- Request that the policy should be amended to require developers to demonstrate that existing sites are not available / suitable for redevelopment, but not to extend this to new ‘preferred’ sites. It’s not considered necessary as long as the site being proposed meets the development criteria in the policies.

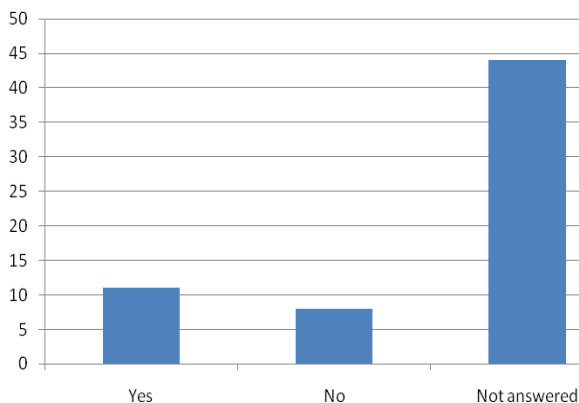
### Main areas of conflict and consensus

80. Stakeholders have commented on a wide range of issues relating to this proposed policy.

### Proposed Policy 6: Development criteria

**Do you agree with Proposed Policy WP6?** *This question was only asked in the full questionnaire.*

**Options:** Yes or No



**Response:** Only 19 respondents answered this question. 11 agree with the policy, 8 do not (for the reasons set out below).

### Do you have any comments on the proposed policy, supporting text of monitoring regime?

*This question was asked in both the full and short questionnaire and at workshops. Views were also provided by letter and Email. Comments received are discussed below*

### Views from government bodies

81. All government bodies support the principle of the proposed policy, with the following suggestions for amendments / improvements:

- TfL welcome the priority given to sites where materials entering / leaving the site can be transported by rail or other sustainable means
- TfL and the HA recommend the inclusion of a criteria which supports sites which staff can easily access by cycling and walking
- TfL requests that the highways impacts of proposals must be fully modelled in line with TfL guidance and should include a Construction Logistics Plan and a Delivery Servicing Plan to help reduce the impacts on the TLRN and SRN
- Suggestion that monitoring indicators around vehicle movements / numbers should be expanded and applied throughout the policies
- It will be important to consider the impact of proposed sites and policies on existing UDP policies and emerging LDFs which, for example, may not allow development in particular

locations or may require consideration of particular issues. This is likely to be particularly important for sites which are located near to sites of importance for nature conservation

- The NHS welcomes the reference to protecting human health and recommend this is strengthened in the policies. The EA also welcome greater recognition of the impacts of particulate matter and bio-aerosols in this policy.
- The EA requests that this policy is strengthened to recognise the role of consulting with the local community, deliver environmental enhancements (e.g. green roofs, river and watercourse restoration/improvements, sustainable drainage, sustainable construction) as well as greater environmental protection. They suggest the following wording should be added, *“Development will be expected to improve the local environment and early consultation with local communities is essential.”*
- The EA would welcome strengthening the wording around encouraging developers to engage with relevant authorities before submitting an application. They suggest adding the following wording, *“Developers are encouraged to contact the appropriate partner borough and the Environment Agency prior to submission of a planning application to discuss all relevant matters.”* *Local communities should be central to the decision making process and consulted early where any new waste sites or upgrades to existing facilities are proposed.”*

### **Views from residents and local businesses**

82. Local stakeholders' comments on this policy are set out below:

- Protection should be given to sites of metropolitan importance and other locally important nature conservation areas
- Protection should also be extended to protect *any* location which supports locally, nationally or internationally protected species (e.g. land around nature conservation areas which is often very important to species).
- Additional consideration should be given to the impact of waste development on the proposed Wandle Regional Park. Consideration of the environmental impacts, particularly noise, visual impact, emissions and odour on the proposed Wandle Park must be ensured.
- The consideration around air quality impact should be strengthened
- The consideration of impacts of habitats should not be limited to land adjoining sites. Impact assessments must recognise that different species use landscapes in different ways and it may not just be the adjacent land which is important to their survival.
- The Wandle Trust request that this policy should include an assessment of the development on heat and evapotranspiration from the site, which is related to the urban heat island effect
- Consideration is needed in this policy of the impacts of hours of operation, particularly night working, 24/7 working which will disturb local residents
- Request to improve the monitoring indicators for this policy to identify the numbers of permissions granted contrary to advice from statutory stakeholders (and identify who those are)
- Under the issue of design, consideration needs to be given to the layout of the site to ensure that impacts on residents (particularly noise) are reduced as much as possible
- The policy should state that proper engagement with local people is needed in the planning process
- Concerns about how local authorities will monitor the impacts of development, particularly air quality (when most boroughs have few air quality monitoring stations) and health impacts
- Consequences of exceeding permitted levels of traffic, air quality etc need to be stated
- The policy needs to address impacts from increased traffic; not just air quality, but also residential amenity, road safety, the suitability of the roads themselves, leakage from vehicles travelling to/from the site, mud spray, damage to cars
- In terms of monitoring, it is suggested that this identifies compensatory measures to be taken if monitoring demonstrates levels of pollution etc in excess of permitted levels
- Concerns about loss of employment

83. The issue of the enforcement of facilities once they are operational was found to be a key concern for residents and was raised at most residents meetings. On this issue, national

planning guidance (PPS10) advises local authorities that, “*planning authorities should concern themselves with implementing the planning strategy in the development plan and not with the control of processes which area matter for the pollution control authorities.*” And furthermore that, “*Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced.*”<sup>17</sup> However, residents are very keen for greater certainty on the control of facilities. At meetings, residents cited recent examples of pollution incidents within the Plan area (e.g. a chemical spill from Thames Water’s operations at Beddington Farmlands into the River Wandle in 2007). Residents were also aware of ongoing disputes between the local authority and existing waste operators. From the comments received, there appears to be general and wide-spread mis-trust of waste operators complying with planning conditions or controls of, for example, traffic levels and emissions. There also appears to be dissatisfaction of the ability of enforcement officers / the Environment Agency to monitor and regulate waste facilities.

84. Other residents are concerned about the safety of modern waste management facilities. Residents living around the Rainbow Park Industrial Estate (one of many sites which were identified in the consultation materials as a potential waste site) were concerned about the risk of explosion of biogas which is produced from some waste processes (e.g. anaerobic digestion).

### **Views from the Industry**

85. The industry supports this policy, with the additional comments set out below:

- Welcome the flexibility which this policy provides
- Request that the policy should be amended to require developers to demonstrate that existing sites are not available / suitable for redevelopment, but that this should not be extended new sites.
- Clarification is needed on the term, “for the entire operation of the facility.” Does this refer to the process from beginning to end, or to the cumulative effects of additional development, for example, where facilities are being extended / intensified?
- Suggestion that the monitoring role identified in the justifying text is a duplication of the role of the environment agency and should not be required
- Recognition should be given to the fact that in redeveloping a site, traffic could be reduced
- Recognition should be given to the benefits of providing renewable energy and heat
- The requirement for developments to provide renewable energy in its design is not referenced
- Clarification is needed on what would be needed to satisfy criteria 4, “*an assessment of the impact of greenhouse gases produced.*”
- Clarification is needed on what constitutes, “*the best design standards*” available; this is considered vague and reference should be made to policy governing design (design issues are also raised in proposed policy WP2 and this could be confusing)
- Criteria 5), “*the impact of development the biological diversity of flora and fauna*” is open to interpretation and needs to be clarified. Does this apply to all sites or just those which are of recognised nature conservation importance?

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

86. There is consensus across government bodies and residents that greater consideration needs to be given in this policy to the traffic impacts of development; and as highlighted by the industry, recognition should also be given to the fact that some redevelopments may lead to a decrease in traffic movements.

87. There is also consensus across some government bodies and local stakeholders of the need for potential developers to engage local communities, the EA and the relevant local authority early.

88. There were several views raised by the EA, local residents and local environmental groups around the need to strengthen the policy requirements around safeguarding local nature conservation sites and biodiversity and providing opportunities for improvements.

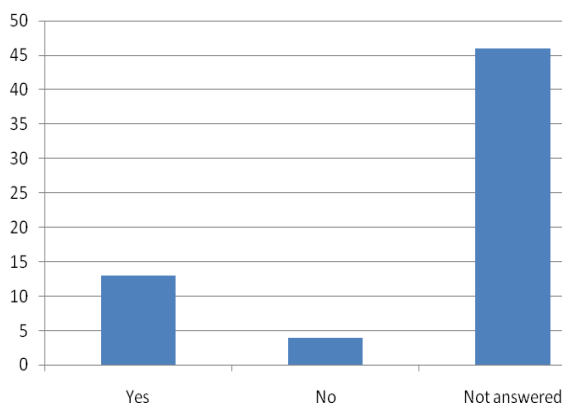
<sup>17</sup> Paragraphs 26-27 of Planning Policy Statement 10: Sustainable Waste Management

89. There is further consensus across the EA and local residents on the need to strengthen the policy wording around the control and monitoring of new waste facilities; though this is not shared by some industry respondents.

#### **Proposed Policy 7: Sustainable, modern energy recovery**

**Do you agree with Proposed Policy WP7?** *This question was only asked in the full questionnaire.*

**Options:** Yes or No



**Response:** Only 17 respondents answered this question. 13 agree with the policy, 4 do not (for the reasons set out below).

#### **Do you have any comments on the proposed policy, supporting text of monitoring regime?**

*This question was asked in both the full and short questionnaire and at workshops. Views were also provided by letter and Email. Comments received are discussed below*

##### **Views from government bodies**

90. All government bodies support the principle of the proposed policy, with the following suggestions for amendments / improvements:

- The NHS supports the encouragement of cleaner technologies, and would support this policy as long as it represents no additional adverse health impacts when compared to other technologies.
- The EA notes the preference for gasification, pyrolysis and anaerobic digestion and recommends that consideration is also given to energy from waste, where it can meet all waste hierarchy criteria and the proposed efficiency criteria which may require the production of both electricity as well as heat output via high quality steam use or district heating and cooling.

##### **Views from residents and local businesses**

91. Local stakeholders' comments on this policy are set out below:

- Thermal treatment must ensure that combined heat and power are provided for the local community to have maximum benefit
- Ensure that recyclables / biodegradable material isn't thermally treated (concern that thermal treatment discourages recycling)
- Ensure that material is sourced locally
- The policy should only encourage modern technologies
- Concerns about emissions and pollution from thermal treatment facilities
- Reference needs to be made to the reuse of materials in the first instance
- The policy must ensure that waste treatment has a neutral carbon footprint, or better
- Opposition to incineration of waste

##### **Views from the Industry**

92. The industry supports this policy, with the additional comments set out below:

- Support the preference for proposals with a lower carbon output to ensure the best environmental outcomes and believe this should be strengthened
- Request that specific technologies should not be mentioned in the policies since the DPD is technology neutral in all other respects and the focus should be on outcomes
- One respondent identifies that the first criterion, which states that planning permission will be granted where *'the waste identified for treatment cannot practically or reasonably be managed further up the waste hierarchy'* is already set out in national policy (PPS10) and is therefore unnecessary to repeat it as part of the DPD.
- The policy implies that an assessment of the waste streams is need for each application which would come forward, which is unreasonable and unnecessary
- The second point of the policy requires for provision to be made for the facility to *'produce electricity and heat or electricity, heat and cooling.'* Although this should be considered as part of the planning application process, we believe it should not be embedded in Policy, as it may not be possible or indeed practical.
- The third point of the Policy requires that heat and power be available to local users, proximate to the source of the energy production, unless the applicant can demonstrate there is no current or prospective demand. However, even where there is a demand, there may be other factors such as third party land ownership, which prevent the delivery. This statement should therefore not be embedded in Policy.

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

93. There is general support across all stakeholders that the most modern thermal treatment facilities, with the lowest carbon output should be encouraged. There is some agreement amongst local stakeholders that thermal treatment facilities should provide heat and power for local use to enable maximum benefit, though the industry observes that there are often practical difficulties with achieving this.

### **Summary**

94. It is clear from the responses received to the Stage 2 consultation that a number of issues need further discussion and agreement including traffic impact (in its widest sense), air quality impacts, noise, visuals and other relevant planning impacts.

95. Further consideration also needs to be given to residents' concerns about what will be built on each of the sites identified and how this fits with statutory bodies' and the industry's general view that the Waste DPD should focus on the impacts of development, rather than specifying in detail what should be built on each site.

96. There is also the need to give greater consideration to the deliverability of the South London Waste Plan. The Planning Inspectorate has asked that sites identified in the final Waste Plan are deliverable and to satisfy this, we have been advised that the Plan must identify potential delivery partners. Further work is required with the industry to achieve this.

2.3 As identified in this report, a number of additional sites, not previously considered in the Plan's development have been identified. Further consideration of these sites is needed internally which may lead to additional public consultation on these sites.

### **The next stage of the Plan's development**

97. The next formal stage in the Plan's development is the publication of what the four partner boroughs consider to be the final plan. Once agreed, this will be published for a period of 6 weeks only and stakeholders will be able to submit comments on the way the Plan has been developed and agreed.

### **Appendix 1: Write up from the four public workshops held during September 2009**

### **Appendix 2: All responses received and initial officer response**



**Proceedings of the Sites  
and Policies Consultation  
stage of the South London  
Waste Plan 2009**

**Croydon, Merton, Sutton  
ad Kingston Events -  
September/October 2009**

**FINAL DRAFT**

# Proceedings of the Sites and Policies Consultation stage of the South London Waste Plan 2009

Croydon, Merton, Sutton and Kingston Events -  
September/October 2009

**FINAL DRAFT**

Prepared by **CAG Consultants**

October 2009

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# Summary of points made

## About the waste plan and its policies

A large number of comments made linked the waste plan to improvements in recycling, with for example suggestions of pushing the recycling rate up to 90%. A considerable number of participants wanted to make sure that recycling policies were able to reduce the amount of waste the plan would need to deal with. A typical view was *"If policies to reduce waste are successful will the plan be able to reflect the lower quantities of waste? We don't want contractors "encouraging" waste in order to keep plants working. How is the plan going to anticipate this "problem"?"*

A number linked such improvements to avoiding the need to build facilities especially incinerators. *"We need to recycle more. Avoid an incinerator at all costs. No contract for the incinerator company to have to give them a certain amount of rubbish to burn – absurd!"*

Some participants were keen to know more about, or were concerned about, the relationship between procurement of waste facilities now taking place and the longer-term process of developing the waste plan. A few said the procurement should wait until the plan was completed.

A considerable number of comments were made about unacceptable behaviour of existing waste operators (see more below) and the need for the plan to have 'real teeth' to deal with private sector operators in future.

A number of participants said they wanted more information about the waste technologies that might be used waste sites. A few said it was hard to comment without know more specifics. *"When can local people have a say on the specifics – what technologies are proposed at which sites?"* Others were more concerned to ensure the best technologies were employed. *"The policies should ensure that developers follow best international practice so that any modern facilities which are built are using the latest technologies and methods."*

A number asked about emissions and wanted more information about whether any noxious emissions, dust or smells would be generated on any sites. *"I want a cast iron assurance that any incinerator will capture CO<sub>2</sub> emissions to the max with no dust or smells."* Another said *"Can you give a categorical assurance that public health will not be compromised by exposure to emissions?"*

A number said that they wanted to make sure sites generally were both attractive and well run so that there were no adverse impacts on surrounding areas. *"Facility must look good, blend in, well-managed, clean, well run, don't want any rubbish impacting on local residents."*

A number of participants raised issues about the transport of waste. This was about the problem of lorry movements (noted below) but also about making sure in future that waste was moved in a more sustainable way such as by rail and water,

with a related point that site location should help ensure this was possible. *"In policy WP2 however, there is no reference to rail/water transport – only 'sustainable' transport. What does this mean? Rail? Water? If yes, this needs to be made more clear in the actual policy".*

A number of participants asked for assurance in the plan that there would be no waste incineration facilities built. *"Is it definite that mass burn incineration of waste will not occur on any of the sites?"*

Conversely, a number of participants said that clean incineration was a good idea especially if it generated energy to be used locally. *"People's images of incineration (e.g. SELCHP) are two generations of technology behind. For instance, Denmark has very clean incinerators in residential areas, which do not even require a high stack (chimney) because emissions are so clean."*

A related question was *"If district heating is to be one of the benefits of burning waste - how are residents who are not local to these parts going to benefit? Will this not be unfair? Should the solution be a much more radical spread of the waste burning plants? Can they be smaller and more local?"*

A number wanted various policies' wordings to be clarified such as the meaning of 'significant impacts', 'wherever possible' or 'thermal treatment'. A few made comments about waste being described in the policies as a resource, feeling it implied wrongly that more would be welcomed rather than waste minimisation being the aim. Others suggested policy monitoring needed more attention and results should be made public.

### **About the sites**

Participants had many questions about identified sites including about the criteria used in the assessment process, including the weighting given to different sites. A few said sites should not be placed in their borough at all, and others wondered whether the spread of sites was fair, or whether their borough was being expected to take a disproportionate amount of waste. Some wondered whether the sites reflected the best locations in terms of transport access and keeping way from densely populated areas, shops, residents, schools, green space and nature conservation areas etc.

The problem of loud, dirty lorry movements was an issue across a number of sites and people living close to existing sites felt they were particularly having to bear a heavy burden from these. Many complained about councils failing to enforce operating conditions on particular businesses. There were many comments about Beddington Lane in this regard. Another example was near Site 6 (Villiers Lane), where among other concerns, lorries were a substantial issue. *"Hawks Road has had to put up with these heavy lorries for the last 7-10 years. It is time to consider the residents after all this time and let some other roads take their share".*

A few potential sites received a number of positive comments about their possible use for waste facilities, such as Site 47 and Site 351/352 although constraints such as traffic congestion were also mentioned.

Some current waste sites and/or areas round were clearly causing significant problems to a number of participants. These included Beddington Lane, Villiers Road, Garth Road, Benedict's Wharf, and Site 353 - Oakcroft Estate, among others.

In this area, a number of residents from Beddington were extremely concerned about their current situation with comments including the following: *"This whole consultation process is just one big con! Beddington Lane has already been identified as the victims - the only sites where there are no deliverability constraints. For once think of the problems! We already suffer and consider those living in this already blighted area thanks to decisions made in the past!!"*

Participants saw a number of likely problems with various of the identified sites being used for waste facilities including increases in pollution; health risks including cancer and respiratory problems; traffic congestion; noisy, disruptive heavy lorry movements; danger to pedestrians including school children; contamination of waterways; flooding risks; land contamination; a bad neighbour to housing (new and existing); adverse effects on property values; smells and dust; undermining nature conservation and habitats; not in line with the waste plan policies proposed.

Sites that might be used (or extended from their current use) were also thought by some participants to be potentially problematic, including Rainbow Park Industrial Area, Factory Lane/Purley Way, Land at Kingston Road/Jubilee Way junction, Willow Lane Industrial Area, and Durnsford Road, Plough Lane, among others.


Participants had a number of suggestions about how waste facilities could be more sustainable and better run. Examples from mainland Europe were cited and included clean incineration (producing energy) and methane capture technologies. *"European countries are way ahead of the UK on energy recovery and waste disposal"*.

### **About the process**

A substantial majority of participants liked the drop-in format, which they said allowed them to get information, speak to council staff and make their views known in an unthreatening environment. *"This was a much better way of doing it, other types of events can get dominated by three or four people"*.

Feedback received from a much smaller number of people said they would have preferred a traditional public meeting in order to have a more group presentation and discussion of issues. *"I would have preferred a Q & A session so that people's views could have been heard by everyone and that officers' explanations were not repeated by everyone"*.

A number of people suggested minor improvements to the drop-in process they felt would make it better in future, such as having an initial introductory talk from council officers and clearer name badges.



There was concern from some participants that their views would not be taken seriously. *“Will the policy makers actually take any account of residents’ views, or, as with traffic issues, just implement their own plans anyway?”*



# Introduction

## Background

Four London boroughs of Croydon, Kingston, Merton and Sutton have formed a partnership to prepare a Joint Waste Development Plan Document (DPD), known as the South London Waste Plan. The South London Waste Plan will set out a planning strategy for sustainable waste management for the four boroughs. It will identify sites suitable across the four boroughs for locating future waste management facilities as well as a set of policies against which future applications will be assessed.

The first stage of consultation on the Waste Plan took place in September and October 2008. At this stage, the consultation materials sought feedback on a range of issues, including the very broad area of search for sites which was identified as industrial land plus existing waste management sites. Importantly, they also sought feedback on a range of criteria which need to be considered in locating suitable sites (e.g. proximity to residents, conservation areas etc).

Since that time, the Plan has progressed. The second stage of consultation for the Plan is underway. A list of potential sites has been identified and the boroughs are seeking feedback on these during a consultation period, which runs until 16<sup>th</sup> October 2009. The boroughs have also drafted a set of policies, which will be used to assess future applications for waste facilities. Again, the boroughs have been seeking feedback on these during the consultation period.

CAG Consultants was commissioned by the four partner boroughs involved in the South London Waste Plan to provide specialist support for these consultation activities. This included designing and running consultative events in Merton, Sutton Croydon and Kingston.

## About the consultation events

Four events were held:

- Monday 7<sup>th</sup> Sept, Croydon Clocktower, 7pm - 9pm
- Wednesday 9<sup>th</sup> Sept, Merton Civic Centre, Morden, 7pm - 9pm
- Wednesday 16<sup>th</sup> Sept, The Guildhall, Kingston, 7pm - 9pm
- Monday 28<sup>th</sup> Sept, Civic Offices, Sutton, 7pm - 9pm.

These events were intended to provide local residents the opportunity to find out more about and make comments on the potential sites and policies, which had been identified as part of the development of the Waste Plan. The boroughs described the purpose of the events in the following way:


*“to seek feedback from local people on the potential sites and policies identified in the consultation documents. The events also provide an opportunity for local stakeholders to voice concerns and for us to listen and address their concerns. We intend to secure experienced facilitators to plan and facilitate these workshops to help fulfil the meeting purpose and make them as productive as possible”.*

These events were run as ‘drop in’ sessions in which a number of council staff, some councilors and waste plan technical consultants were available to discuss the policies and sites and these policies and sites were shown on large display panels and maps. CAG staff acted as facilitators to help this process occur and make sure concerns and ideas were documented as far as possible. Participants were encouraged to record their points of view. This was done in a number of ways:

- Through participants writing up comments on maps and policies boards;
- Through facilitators noting down participants’ verbal comments;
- Through participants filling in South London Waste Plan questionnaires; and
- Through some participants recording a short video on a video booth provided at each drop in event (10 people made a short video message on their views about the waste plan for the boroughs to view).

The written comments are documented here, while the videos and transcripts have been forwarded to the boroughs.

The events were designed as ‘drop ins’ with a lot of information provided on boards, and individual officers and experts to speak to, rather than as traditional meetings with presentations and question and answer sessions. This was to maximize the amount of information provision and opportunities to comment on policies and possible sites. CAG ran an ‘exit poll’ at the end of each event to receive feedback on the process. This was to see whether participants felt that it had worked for them in finding out more about the waste plan and making their views known, and to suggest any improvements. Overall the feedback was largely positive. Typical comments were that:

- Our views were captured much better this way, rather than a public Q & A, through the post-it notes etc;
  - The meeting wasn’t ‘taken over’ by more vocal participants;
  - This was a much better way of doing it, other types of events can get dominated by three or four people;
  - A chance to meet other locals and discuss views with them;
  - I was free to wander around. This format had much more impact for me than a traditional Q & A session;
- 

- I learned more here than at an ordinary meeting, although not sure whether I will be listened to;
- I got to give my views in the video booth;
- I was able to tell officers what I thought;
- It was better than being talked at.

However some participants did not feel that aspects of or the whole format worked so well for them and some would have preferred a more traditional meeting structure. Typical comments were:

- It wasn't possible to speak to all of the officers and consultants as some of them were 'hogged' for a long time by other residents;
- I would have preferred a Q & A session so that people's views could have been heard by everyone and that officers' explanations were not repeated by everyone;
- I was expecting a public meeting;
- I came away with more questions than answers;
- The meeting didn't facilitate public discussion or group working – I would have preferred small group facilitation followed by plenary discussion.

Participants suggested a number of improvements could be made. These included having some kind of introduction or initial plenary, better signposting of staff/experts, techniques to make sure everyone got to speak to staff, information about technologies, and suggestions for circulating Proceedings:

- A 5-10 minute introductory talk would have been very helpful to help give everyone an overview of the issues;
- An introduction to the format at the beginning of the event would have been helpful, to help people navigate through the evening and identify who to speak to;
- I liked the format, but would have preferred a plenary session at the beginning;
- I would have liked more information about the technologies that could be used;
- It was hard to identify officers and consultants. Some didn't have name badges on and even those that did weren't obvious. Bright t-shirts would have helped.
- I wanted more councillors there.

- A copy of proceedings should be sent directly to all participants, rather than being an appendix to the consultation report only found on the Internet.

## Number of people attending events

Overall 214 people attended the events (based on numbers registering for each at the door), and the numbers were broken down as follows:

- 50 at Croydon;
- 47 at Merton;
- 45 at Kingston; and
- 72 at Sutton.

## The range of participants

There was a wide range of people at the four drop in events, including:

- Local residents;
- Representatives from the waste industry;
- Transition Towns;
- Conservation Groups;
- Residents Associations;
- Faith groups;
- Political party representatives;
- Local Friends of the Earth groups; and
- Local press.

## Structure of these Proceedings

This Proceedings documents in as much detail as possible the comments made by those attending the events. These have been written up directly from comments left by participants. It also provides a summary of key issues raised. It is structured as follows

- Summary of issues raised;

- Introduction;
- Croydon comments - in general, on waste plan policies and on possible sites;
- Merton comments - in general, on waste plan policies and on possible sites;
- Kingston comments - in general, on waste plan policies and on possible sites;
- Sutton comments - in general, on waste plan policies and on possible sites.



# Croydon comments

## Overall points

How does the procurement process work - will the four councils procure together or separately?

What links are being made with Defra's consultation on the waste strategy?

Why does the process take so long when developers in Scandinavia or Manila can propose the latest high tech efficient technologies and can get them set up without the delay of the planning process that we have in the UK?

Why was a drop in session chosen, when a questions and answer session would have given people the opportunity to hear other people's questions and have an audience discussion?

How else can people input during this stage? And future stages?

When can local people have a say on the specifics – what technologies are proposed at which sites?

Where can I get more technical information?

## Comments in relation to Policies

Encourage recycling of a large range of items and reduce non-recyclable packaging.

Why no levels of noxious emissions?

Re use, recycle, reduce.

I want a cast iron assurance that any incinerator will capture CO<sub>2</sub> emissions to the max with no dust or smells.

I am concerned about the huge impact of plastics on the environment. It needs government intervention to change production – one type of plastic only that can be recycled. Whenever possible, alternative containers to be used.

Emissions – will there be any? What will they contain? What is the fall out area? What tests have been done on health implications?

Supermarket bag recycling across the 4 boroughs.

Sites should be 'bunded' because geology around here is sandstone.

Policies should be very focussed on what comes out of facilities to make sure there is no environmental damage.

I am concerned that recycling should come before incineration. That where viable energy be produced from waste. If this can be locally produced so much the better to minimise transport. Waste sites should have adequate access.

How can we choose a site when we don't know which facility will be placed there?

What happens to disposable nappies?

Clarify that hazardous waste not involved in this process/scenario.

Can you give a categorical assurance that public health will not be compromised by exposure to emissions?

When will details of new technology be available?

Will councils pressure supermarkets on excess packaging?

Can you trust business to use science and technology properly?

No landfills no incinerators. Closed loop system to breakdown to inert reusable substances, creating down energy use.

If this process will decide the waste management processes for processing the waste, how will collection processes e.g. black bin bag collections/kerbside recycling be decided?


Why does the document say that the procurement process for black bin bag collections 'began in May 2010'? Is this a typo, and why is a procurement process being conducted before the strategy is agreed?

Will the policies make any difference – or will the councils do what they want anyway?

Which technologies are the councils biased towards?

The policies should ensure that developers follow best international practice so that any modern facilities which are built are using the latest technologies and methods;

In WP1, the policy should ensure that the most efficient facilities are built to ensure we take advantage of international advances in processes and technology. Facilities will improve as time goes on and we need to build this into the policies so that we're always ensuring the best, most efficient and modern facilities are built. E.g. as time goes on, advances will be made to ensure facilities are less smelly, less noisy, process waste more efficiently etc.



In WP2, the policy should require local authorities to lobby central government to do more about packaging waste. Under the Sustainable Communities Act, local authorities now have the power to put pressure on Government to require companies (particularly those who local authorities procure goods from), to reduce packaging. This should be done.

In policy WP2, 're-use' needs to be more explicit. We need to look at the building first; can the building be re-used as it is? What about fixtures and fittings? The policy as it stands seems to imply that the building materials e.g. bricks will be re-used, but the policy needs to go further and encourage the salvaging of any other parts e.g. windows, lighting fixtures, radiators etc.

In the supporting text to policy WP2, I really support the idea of movement of waste by rail/water.

In policy WP2 however, there is no reference to rail/water transport – only 'sustainable' transport. What does this mean? Rail? Water? If yes, this needs to be made more clear in the actual policy.

Policy WP2 (point 5) also fails to refer to the dismantling and reuse of components of buildings e.g. windows, radiators etc. This needs to be in the policy.

Policy WP6 – what does 'significant' adverse effects mean? What constitutes 'significant'?

Policy WP6 talks about traffic impacts but how do you measure the transport impacts of using rail/water? This needs to be considered because it may require the building of wharfs/additional rail lines etc and this isn't currently considered under the policies.

The tables on monitoring need to be made clearer. How is the monitoring information going to be made public? This should be stated. Also, why not make this available every 6 months? Why only annually?

Table 3.19 of the A4 consultation document refers to a Sutton borough target. Will this apply to all boroughs? If yes, this needs to be made more clear.

Table 3.22 of the A4 consultation document talks about the number of planning permissions given despite EA advice to the contrary on air quality issues. Does this mean that planning permissions can be given despite the EA objecting on air quality grounds? What are the local authorities doing about this?

Para 3.33 of the A4 consultation document needs to continue to also say that people will be consulted about changes to existing facilities (i.e. they won't only be consulted if it's about new facilities but also consulted about changes to existing facilities where planning permission is needed);

The table of policies to be superseded – in the next iteration, you should make it clear which policy is taking over the old policy. At the moment, this isn't stated in the table, so no direct correlation can be made.

## Comments on sites

Could waste sites incorporate methane capture into sewage sites already not near housing areas?

Have new technologies in other countries been studied to find out what works and potential problems?

We need to recycle more. Avoid an incinerator at all costs. No contract for the incinerator company to have to give them a certain amount of rubbish to burn – absurd!

Make it safe sustainable for all of us. Get agreement of the residents of the boroughs.

Why are these sites in Croydon anyway? Why not another incineration area: London Bridge, Belvedere, Heathrow?

Why have it near residential area and school?

Access to sites should bring waste in a manner to cause minimal environmental impact. Traffic chaos could be caused by large lorries in narrow roads like Bushy Lane. Could tramlines be used for transportation?

I'm interested to know more about how additional sites have been assessed, in particular the first additional Croydon site. This would be suitable for small-scale composting and recycling but not, in my view, other uses – has this type of issue been considered in the site assessment?

This consultation is linked to the current Defra consultation on waste processing methods, isn't it? [Facilitator attempted to clarify that it was not linked.]

The biggest issue is the need for more doorstep recycling – to reduce volumes of waste for disposal. The council needs to invest more in this.

Should there be a recycling hub for waste you can't put into your boxes?

Need staffed neighbourhood recycling facilities. Greater doorstep collection.

Municipal waste should be 70% recycled – not 45% like in London Plan.

Find out where people are from.

In the stage 1 consultation, there was talk of having a centralised system of waste management sites for all boroughs: for example, 1 big plastics recycling centre, 1 big metal recycling facility, 1 big composting facility. I am concerned that this would generate too much transport across the boroughs and hope it is not being taken forward.

European countries are way ahead of the UK on energy recovery and waste disposal. They get on and do it while the UK takes years and years to consult (e.g.

first on plans and then on planning applications). People's images of incineration (e.g. SELCHP) are two generations of technology behind. For instance, Denmark has very clean incinerators in residential areas, which do not even require a high stack (chimney) because emissions are so clean. People do not understand that there are far more molecules of dioxin in a normal cubic meter of air than in the scrubbed emissions from a modern incineration plant.

The Waste Plan must have real teeth to deal with private sector interests, which tend to win out in the borough of Croydon. Stipulations must be made clear and then monitored and enforced, otherwise private companies will find ways round them and not deliver what the document says.

Why not have an incinerator? This could solve waste problems and energy problems at one stroke.

The map suggests that major recycling sites (i.e. civic amenity sites) would be too far apart. They need to be more local within each borough to reduce resident's travel to these sites. [Facilitator explained that not all current recycling sites are shown on the preferred sites map]

Why are all the proposed sites in the more densely populated parts of the borough, rather than in the south? For instance, the Factory Lane site is near residential areas and schools.

What happens to industrial companies already operating non-waste businesses on proposed waste sites?

Would existing firms being displaced by a waste facility result in a net loss of jobs?

The first consultation round identified nature conservation as a key issue. Yet the sites in Stage 2 are all in close proximity to nature conservation areas.

Purley Way sites could be used and suitable. Factory Lane has accessible roads.

Re Purley Oaks Recycling Centre: The pond, trees around are a green lung. This site is on a busy road which cannot deal with it at all at present. If it was extended for more recycling containers, traffic would be able to get off road more quickly. If the site was used for a scheme which involved more heavy vehicles congestion would be worse.

Factory Lane/Purley Way – The works could cause a smell nuisance, lorry journeys, particulates. Amenity impact may be less in Merton.

There is an estate down the whole of Purley Way South. Purley Way is already overloaded with traffic.

So where's the incinerator going then? If only 15% of waste is going to landfill, then there may have to be some form of incinerator. You would not want an incinerator to be put near residential areas or schools. So an incinerator will end up in Beddington Lane, won't it? [Participant talked in detail to technical expert about site 532.]

2 preferred sites are next to the Beddington Farmlands site, or adjacent to it. Both raise nature conservation issues. This goes against the principles set out in the consultation document. Beddington Farmlands is home to the tree sparrow. There is a large concentration but it is difficult to keep them there. Development on these sites could have disastrous results.

I'm concerned about site 641 in Wimbledon as I've just bought a flat next to it and am concerned about the impact on its value.



# Merton comments

## Overall points

Have big maps of all 4 boroughs – some participants could have commented on sites in other boroughs.

Room too small.

Do brief presentation at the beginning, explaining process, status, who's who, then wander about.

This meeting not a good way to capture everyone's views – need people sitting down and listening to each other and minutes taken. [Firstway resident]

Technical reports ought to be available at public libraries.

Will the policy makers actually take any account of residents' views, or, as with traffic issues, just implement their own plans anyway?

Many residents not happy with the format for this evening. Questionnaire in consultation report is too complicated (e.g. p33 shows sites not being prioritised, but will people grasp this?). And p60 'Q4a' not easy to answer. Consultation should be much simpler. More general questions, e.g. do you agree with the SLWP? Where do you live? How would it affect you? Weighting is flawed: findings on traffic and residential proximity were doubled – is this right? [comment by Councillor]


## Comments on Policies

A priority should be a reduction in the amount of non-recyclable waste – plastics and non-biodegradable waste then additional sites would not be needed.

There has been talk for too many years. It is time to push recycling to 90% and force everyone to do it using existing sites. Children and schools should be at the forefront.

Policy makers will find it hard to implement [policy] No.6 as inevitably existing waste management sites already impact on the local population and environment.

Schools should teach more about reuse/recycling and the land you live on. People who don't recycle should be fined.



Council should aim for more than 50% recycling. Should aim for 90% recycling – look at this in policies.

More should be done about waste packaging – we should still try to do something locally – start local. Teach this in schools.

Should be looking for sites on green, open spaces.

Don't want to take too much of our green spaces – I think it would be better to use existing industrial sites rather than taking away our green spaces.

Composting/recycling is good.

Facility must look good, blend in, well-managed, clean, well run, don't want any rubbish impacting on local residents.

Worried about taking away employment. Can we say there must be no loss of jobs in the policies?

More materials should be re-used e.g. bottles.

More company responsibility for the products they produce at end of their life.

## Comments on Sites

Very concerned about air emissions. Any facility must not release harmful gases.

What you do in Merton will affect me in Sutton very much – I live near the boundary.

Concerned about facilities running through the night – should be dealt with.

A lot of responsibility goes to central government to put pressure on supermarkets to reduce packaging.

Why not introduce American system of micro chipping bins and incentives for recycling?

Sites must be well managed and well run and clean and tidy. Waste sites should not be by housing – noise and traffic, vibrations from heavy traffic in early morning, dust, noise, should not be allowed to operate all night. Council site runs all night – too noisy.

100% weighting process seems very strange – a score of 3 becomes 6 (makes a site more suitable).

Would a riverside site be more practical to keep lorries off congested roads? And a riverside site may be away from residential housing.

Mitcham and N.W Croydon have the biggest proposed sites with the common separating them. Both areas are densely populated and are subject to heavy traffic.

Is identifying the sites without knowing what kind of waste will be processed addressing the problem the wrong way round?

Will recycling on these sites be rigorously followed so that 'dirty' waste is kept to a minimum?

Is it definite that mass burn incineration of waste will not occur on any of the sites?

How big are the buildings on these sites going to be? Tall towers for burning waste? Smells? Level of traffic to and from the sites, noise.

People have started burning their own rubbish and fly tipping because they can't get into the dump (e.g. private vans not allowed)

Site 6 Villiers Road (Kingston) - More traffic going past King Althehan School. More accidents.

Site 9: Garth Road - Traffic around Garth Road is already bad. Don't want any increase in traffic.

Site 9 - Has been getting worse and worse. Lorries from 5.30 a.m. Would traffic increase? Smell has improved since waste facilities have been covered

Site 22 - Willow Lane Industrial Area - The Willow Lane site is massive, backs on to housing (Carshalton Road). Traffic on this road is already heavy into Goat Road where the access is.

Site 47 Land at Kingston Road/Jubilee Way junction, Tolworth (Kingston) - Tolworth Roundabout already an accident black spot, this will make it worse.

Site 60: Rainbow Park Industrial Area - In the middle of residential area!

Site 60 - Firstway is missing from assessment of residential proximity (51 houses in total, 25-26 on roadside nearest Rainbow Park).

Site 60 - Technical Report contains mistakes, most probably deliberate, when scoring potential sites. Site 60 omitted a whole street when scoring proximity to residential areas [Firstway].

Site 60 - Very important that this sewer is not polluted and that no one tries to re route it (effectively part of Thames flood plain).

Site 60 - Should be classed as having flood risk.

Site 60 - Surface water sewer runs across the site, every 2-3 months the access pit turns into a fountain when rain is excessive. Flows north towards Hogsmill River then straight into the Thames.

Site 60 - This site is too small and enclosed by residential areas – the extra traffic caused will impact adversely on the local area. This is currently **not** a waste management site.

Site 60 - Not at all suitable. There's already too much traffic to it right at the train station. Environmentally damaging (flooding potential, vermin) to residents.

Site 60 - Strange assessment re co-location – surely all units would need to relocate?

Site 60 - Firstway residents were not even mentioned – so close to this site – already affected by traffic into/out of industrial sites – traffic already dangerous by station.

Site 60 - Archaeological interest (close to pre medieval farm), wildlife (bats) and respiratory risks.

Site 60 - Owned by Workspace Glebe. Want to bring waste from all over London. Put on list late in the day after someone ringing Kingston BC.

Site 60 - Lots of people here from Rainbow Park because of Workspace Glebe emerging application for anaerobic digester (2 public meetings already over past year).

Site 60 - The site is now industrial use. This anaerobic digester has to be built. This will cause years more traffic noise pollution and disruption to a heavily populated area.

Site 60 - Rainbow Park is right next to Raynes Park shopping centre – dangerous traffic junction by station, turning into the site.

Site 60 - The daily traffic is almost at a standstill during the day along Grand Drive. How can this site help traffic and air quality?

Site 126: Benedict's Wharf - Lorries should be closed but are open. 3 schools in the area, lots of housing. Smell nuisance from existing site.

Site 126 - Rubbish gets dumped at entrance to Deer Park Gardens.

Site 126 - Site is in a heavily populated area with a school and only narrow church road for access. The roads would not take heavy traffic and would affect foundations of houses.

Site 126 - Site owned – most lorries come down Morden Road from west loop around east and north to enter site. Lorries huge and smelly. This site is only bit of industrial estate in a sea of residential.

Site 127 - Willow Lane area by River Wandle - Contamination of the River Wandle

Site 136: Deer Park Road site - Will it affect the value of my property?

Site 136 - Are they 'sites' known to increase infestation?

Site 136 - Do you have any feedback from residents living close to existing sites?

Site 136 - Will these sites increase traffic congestion even add new bus routes?

Sites 641, 642 and 651 - Durnsford Road, Plough Lane - Durnsford Road: traffic problems and that was the main reason that a supermarket (Safeway) was recently turned down there. The traffic survey was done at 3pm. Hayden Park Rd, Plough Lane and Durnsford Road – all always blocked.

Sites 641, 642 and 651 - We should take into account Wandle Valley Regional Park – Durnsford Road should be scored a '1' for nature conservation because of this, Wimbledon Park.

Sites 641, 642 and 651 - [these 3 sites] Don't satisfy [policy] WP6 [development criteria]?

Sites 641, 642 and 651 - None of these sites satisfy WP6!

Sites 641, 642 and 651 - Garratt Lane near Durnsford Industrial Estate is a strategic road but it's blocked completely!

Sites 641, 642 and 651 - Why so highly rated? Traffic black spots.

Sites 641, 642 and 651 - All 3 sites are in the flood plain.

Sites 641, 642 and 651 - All 3 sites are in proposed regional park.

Site 642 – Durnsford Road is already full of traffic.

Site 651 – Plough Lane is a traffic black spot – new housing makes it totally full (570 flats Plough Lane development).

651 – Plough Lane is the only road to St. George's Hospital for some distance and is already blocked.

Site 651 currently used for employment (Wickes) – potential loss of jobs.

Site 651 - New housing (570 flats) in area shown as blank on this map.



# Kingston comments

## Overall points

Future consultations need to write to all ratepayers.

Throwaway milk cartons are not a good example to set in a meeting on waste!

## Comments on policies

It is good the plan is now referring to composting and recycling but whoever has put the compost ideas in assumes it's on a centralised scale.

To allay residents' fears put something in policies re enforcement (eg planning conditions and Section 106 to fund enforcement issues).

Policies - don't really seem like policies - more like procedures (ie Policy 4) would be very surprised if taken literally - ie harm related policy.

If policies to reduce waste are successful will the plan be able to reflect the lower quantities of waste? We don't want contractors "encouraging" waste in order to keep plants working. How is the plan going to anticipate this "problem"?

I accept there will probably have to be some form of incineration, but as the plan advocates this heat must be turned to useful purposes.

It is a pity that the plan cannot address waste minimisation as an essential part of the overall problem ie mitigation of all waste - commercial, domestic etc.


If district heating is to be one of the benefits of burning waste - how are residents who are not local to these parts going to benefit? Will this not be unfair? Should the solution be a much more radical spread of the waste burning plants? Can they be smaller and more local?

Policy 2: Phrases like "wherever possible" are too vague and meaningless - be more positive/assertive. There ought to be more "sticks" and less "carrots" in these policies.

Please consider the use of the existing rail network as well as roads.

What does significant impact mean? Eg 10% increase in traffic or 50%? Please define this phrase.

Concerned that waste contracts are too long. Can we build in flexibility to respond to changing types of waste/amounts of waste (which should reduce)?



A243 will be a nightmare and we don't want waste lorries using the road in the middle of the night and clogging up the roads. Waste should be moved by rail if possible. Traffic is going to be the main issue.

Why can't the origin of plastics for industrial/retail use be controlled by law, such that only recyclable plastics can be used?

## Comments on sites

The sites should have been publically identified earlier, and precisely where. Sure they're known where they were going for months.

Is the emphasis on "cutting edge" technology realistic given recession etc?

Why not have more composting sites? If composting is to be done in an efficient way need large number of smaller sites across the borough.

Things have not moved in 20 years. Surrey looked at incinerator 20 years ago but dropped because too difficult. Concern that process is too long - decisions get put off. Just need to get on with it.

There is not an even geographical spread of potential sites - heavy concentration on Croydon Mitcham area. On the grounds that the "polluter should pay" should these sites be more evenly spread? Accepting that some will have to be small "local/low key".

Why are there great gaps in the distribution of potential sites? Eg North Kingston (affluent) has none - poorer areas get most of the pain. But affluent households probably produce more rubbish. (Should follow 'polluter pays' principles eg compost site, on every estate).

Is it better to spread the facilities out a bit rather than concentrate them all on Beddington Lane.

Site 6 - When Hanks Road shut for Thames Water works, lorries found other routes. Why not one in through Hanks Road and leave via Surbiton - not wide enough for 2 way lorries. Lorries have to swing out to turn in/out of Villiers Road - sometimes mount pavements and damage pavements. Have raised this with Crossrail (2 community meetings). No one wants the lorries but question is how to share the pain. All lorries from Villiers site come in and out. Narrow Victorian road. Have already discussed with council back in 2003 whether they could be routed via wider roads in Surbiton. Start before 7am. Actually start at 5am (despite protests) - Hanks Road resident.

Site 6 is in a good place, away from housing.

Site 6 - The Villiers Road site is constrained by the Hogsmill River, A playing field and school opposite, as well as other schools quite near, and the **Felper(?)** Roads, Hawks Road in particular are quite narrow and the houses are very near the

carriageway, whereas other more industrial sites have better access and less adjacent housing etc.

Site 6 - Far too many lorry movements on Hawks Road (on their way to Villiers Road).

Site 6 - Hawks Road has had to put up with these heavy lorries for the last 7-10 years. It is time to consider the residents after all this time and let some other roads take their share.

Site 6 - The lorries should come in one route and go out the other. I agree!

Site 6 - 4 schools on Villiers Road - would be used by lorries (3 primary and 1 secondary).

Site 6 - We must protect MoL in the Hogsmill Valley and keep it for wildlife, the communities living there and safe from pollution, heavy traffic and lorries that flout HGV bans that we can do nothing about.

Site 6 - Hogsmill River - higher pollution downstream from adjacent sewage works. Would be vulnerable to further pollution. Pollution levels should be monitored - Athelata St Josephs and The Mount.

Site 6 - Good site - there would be hardly any visual impact. (A second comment made on same post-it: Disagree!!).

Site 6 - The lorries are too large to go in and out on one route. They need to go in one way and out another so I agree.


Site 6 - Talk to Thames Water about the availability of their land.

Site 6 - Residents of Hawks Road and Albert Road will object strongly to any more lorries driving through their Roads. Already these small Victorian roads take all the traffic.

Site 6 - Loads of students are moving in to Hawks Road. Will they care? Won't like early morning lorries.

Site 6 - Villiers Road is well managed currently. It should remain a waste site as people are used to it. And it is conveniently located. The technology needs to be considered.

Site 6 - Resident of Villiers Avenue - to locate a transfer site. Not ideal site in middle of residential areas lorry access not well policed (eg shouldn't use Villiers Ave but they do). If this becomes a waste site, would waste come from other boroughs as well? Concerned that degree of control is lost with private sector. Where do driving targets come from? Feel that Kingston might be asked to take a disproportionate amount of waste.



Site 6 - We need to consider that there is no way of creating a good environment in the Villiers Road/Hawks Road area while we allow vast lorries to fill our roads at totally unsocial hours.

Site 6 - Whilst use of the site is reasonable the majority of materials there are heavy and need to be transferred should go to site 47 or 352/353.

Site 46 - A243 is already too congested. Site 46 should be serviced by rail not by road. It may also be used by Surrey residents - not south London as it is so near the county border.

Site 46 - Access is not good enough. Traffic is already bad. This will make it even worse!

Site 46 - This is an 'up market' industrial estate adjacent to green belt and housing - totally unsuited. A243 is also inadequate for increasing traffic.

Site 47 - potential civil amenity site - good transport links including signalised junction.

Site 47 - why was current batching plant (between site 47 and railway) not considered? (Mouchel noted that was considered but had deliverability constraints).

Site 47 - We need to think about other siding at the Tolworth Railhead. We can share the rail track.

Site 47 is a suitable site (more than site 6) - because already industrial and has good transport links.

Site 47 and 352/353 are ideally placed to relieve the congestion, pollution and threat to wild life, in the Hogsmill Valley. They are on main roads and will leave green spaces for our communities.

Site 47 and 352, 353 are ideally places for taking mass transfer waste/recycling for the whole of Kingston Borough. Their value is that they are already on major main roads.

Site 47 is quite small - the Tesco site alongside the A3 is much bigger with excellent road and rail access.

Site 47 - should provide the same facilities as Villiers WTS that LSD that the amount of traffic going down Villiers could be reduced.

Site 47 - Tesco land. This scheme needs to have more clout and take priority over the housing sites. Commonsense is needed. Think bigger! Eg move the housing requirement from the Tesco site to other areas eg Red Gan (?) Road Industrial Estate. There needs to be a negotiation between housing and waste needs. Would prefer to have concentrated sites and as few sites as possible.

Site 351/352 land and Kingston Road/Jubilee Way has by far the best transport links and should incorporate the old government offices (Tesco land) as one block, with the advantage of Chessington industrial estate as a near by add on.

Sites 351/352/353 are currently underutilised but traffic access is difficult. Please consider a new junction on the A3 to serve these sites and Tolworth Girls School.

Sites 351/352/353 - traffic congestion major issue - A3 and Kingston - Epsom A240. Emissions, [word unreadable], gridlock. Moving from residential to heavy industrial environment, urban wasteland scenario is that RBK's, Longrange. Planning policy for this part of the borough? What [word unreadable] does the road system have to be seriously considered? Too little is known of the [word unreadable], infrastructure objectives in terms of: operations, process, volumes. Many roads too narrow for 351, 352, 353.

Site 351/352/353 is the aim to have lots of smaller sites or one big 'wasteland' like Willesden Junction?

Sites 351/352/353 - After spending millions on Chessington Community College, you plan to (?) a (?) plant next to it!

Sites 351/352/353 - How many jobs will be lost on the Chessington industrial estate?

Site 351 - It is important not to push out existing businesses. Disused sites should be looked at first.

Site 351 - Has already tended to be heavier industry than around 353. Better access via Jubilee Way as well.

Site 351 - Office and production building on the corner of Cox Lane/Davis Road "Chelwood House", finished at the end of 2004, on the King George trading estate. Our concerns are the CPO of our site. Concerned about value of land. We have built a high quality building and need to maintain value of the charity's assets, preservation of our asset. Traffic will be a consideration and general environmental effects. Third concern would be smell and dirt. (Bible and Gospel Trust).

What about the Old Coal depot site? It already has rail connections (ie site 46) and railway.

Site 353 - Problem is not trucks and lorries, but change in nature of industry/units of a site.

Site 353 - Concerned about odour and nuisance. People next to site will be very hostile (Oakcroft Estate as a whole - Ashcroft, Kirkcroft, [word unreadable] etc). Oakcroft Road resident.

Site 353 - Currently clean business park eg software manufacture). Should be very concerned if they had heavy lorries coming here. Oakcroft Road resident.

Site 353 - Oakcroft Estate - small 2/3 bed houses with lost of young children is vulnerable to any impacts.

Site 353 - Chessington Road estate should be looked at along with Kingston Road/Jubilee Way and the Tesco site.



# Sutton comments

## Overall points

I don't feel that information has gone out widely enough - 50-80 people at this event is not a lot eg have leaflets in reception area in Council offices.

Did boroughs share the costs of this exercise equally - given concentration of sites in Sutton?

Impossible for people to formulate opinion on the use of sites with undisclosed proposed development.

Wanted presentation and debate. This is a waste of my time.

Nobody in Wallington got a letter/leaflet. In libraries - documents 'hidden away'; not clearly on display.

Resident (also working in waste industry) hasn't had any notification of this process until 4 days ago.

If co-mingled collection, boroughs likely only to want 1 MRF across 4 boroughs?

How will rates be equitably decided if Sutton is taking waste from other boroughs?  
How would Sutton residents be compensated?

## Comments on policies

Concerned about how height of waste alleged to be stored outside as county ships piles [of waste]. Pyrolysis/gasification should only be using non-recyclable waste. Can they operate technically without paper, plastics? FoE are saying they need to have a mix of recyclable/non-recyclable waste.

Can the council please everyone? What plastics can be recycled? It would reduce landfill.

Why is Croydon tendering for an incinerator before consultation is completed?

Difficult to make proper judgements until we know what is proposed for each site ie "thermal treatment" means an incinerator?

How will sites at Beddington affect the country park?

Will there be facilities to recycle energy efficient light bulbs?

All waste should be handled on disposal sites in enclosed buildings to contain dust and pollution.

Nature conservation should be a priority.

Croydon are asking bids for: 9051330 = incineration. 9051390 = sludge disposal, 905200000 = radioactive, toxic medical and hazardous waste services, 9052400 = clinical waste, 45252300 = incinerator construction.

Incinerators only 30% less CO<sub>2</sub> than coal!

NO BURNING (Pyrolysis or gasification) or land filling of radioactive waste which should be contained safely till radiation subsides. Could be a long time.

What will happen to "sustainable Hackbridge" if Beddington gets the go ahead for an incinerator?

Whatever happened to the proposed park in Beddington?

PFI is not the way to run things - will lock you in to contracts.

Local composting sites for green waste. Garden shredders shared communally.

Pyrolysis etc in China, processes don't actually run at high temps.

Waste minimisation should be enforced: eg tax on packaging, obligations on supermarkets to take back packaging waste.

Less packaging and do away with as much machinery which creates packaging.

Waste minimisation needs to be the first priority - would dramatically reduce the volume of rubbish produced.

(Policy 1) What does it mean to manage waste as far as possible up the hierarchy as possible? Surely we should be stronger. This is a get out clause. Q: What will happen when the landfill tax runs out? The driver will disappear. How will the waste plan drive waste up the hierarchy when we run out of landfill and there is no longer a financial incentive to drive waste up the hierarchy? It will just all be buried.

(Policy 1) The supportive text says 'waste is a resource' the word resource implies it's a good thing and we want more of it. Surely we want to reduce it. Its dangerous wording, for example a CHP will say they've met the policy because it's a 'resource'.

(Policy 1) Waste minimisation should be the ideal.

(Policy 1) Projected waste increase 16% by 2021 but population increases only 6%. This does not make sense.

(Policy 2 Bullet 3) If we classify waste as a resource ie to produce energy, it will discourage recycling/reuse/composting.

(Policy 1) What about oil and other fossil fuels declining so less rubbish/recycling?

(Policy 1) Less materials produced because of less oil eg clothing utensils and a lower standard quality of life.

(Policy 1) Re use, repair, make do and mend behavioural change shift to make a look cool.

(Policy 1 Bullet 2) Recycling the only answer.

(Policy 1 Bullet 3) Distance from residential - what is the legal requirement? North Beddington - ? station. Health and noise risks lorries.

(Policy 1 Bullet 3) Cumulative impact of potential sites adding to noise and dust from.

How much space you need where depends on which methods of processing you use. Which do you decide first?

Recycling still has disadvantages eg noise from traffic.

(Policy 2 Bullet 3) Recycling facilities create jobs and don't COST THE EARTH!

(Policy 2 Bullet 3) One incinerator for Croydon, Sutton, Kingston and Merton + truck pollution BIG TIME.

(Policy 2) Waste minimisation should be priority No 1 - not just applying to construction.

Will depend on the cost of developing each site - cost effectiveness is key factor.

Cost (lifetime) of types of waste treatment need to be considered.

We should move away from economies based on growth of production, to growth of happiness/well being. Incentives/subsidies given to repairing. Training in skills for this. Space should be allocated for people to help themselves to reusable things which others have to dispose of.

Introduce a day a month when one can leave out any useful item not wanted by you, to be available for anyone to help themselves to.

(Policy 4 Bullet 5) Concerned about radioactive waste - we need to address this in policies. We should link up with bioregional and CIRIA to look at policies.

(Policy 6) Crucial that Transport of Waste involves much tighter control of vehicles - to ensure access roads are clear of droppings. This is what upsets residents.

(Policy 6) Shouldn't the places look smelly and ugly so people waste and use less so they have to close down?

(Policy 6) Policy OK if you can make them keep to it.

(Policy 6) CO2 emissions are important.

(Policy 6) Should be aiming for a CO2 neutral processes and carbon neutral.

“Thermal treatment” = (in most cases) an incinerator. A properly sustainable waste management strategy should NOT include ANY incineration! Incineration: (1) inhibits recycling by locking councils into long term contracts to feed the burners. (2) Burning waste does not produce “green” electricity - CO2. Emissions put it well down the league. (3) There are serious threats to human health especially from commercial and hazardous waste streams.

(Policy 7 Bullet 1) This statement is obvious of course nobody chooses a poor performing technology.

(Policy 7 Bullet 1) Mass incineration is not ‘mass’ as it only burns 99.8%.

(Policy 7 Bullet 2) Re-use - not just recycling.

## Comments on sites

Want to know what’s really happening with the Plan. How can I suggest a site when I don’t know what’s going on it?

Sutton Council have undermined the consultation by stating their preferred choice of sites already!!

Sutton takes waste from other boroughs already and makes money from it.

Sutton - Council biased towards recycling. Recycling buildings put up without planning permission.

Why is council (Sutton magazine - 3 months ago) offering relocation of residents to Cornwall/Devon?

What technology will deal with the transport impacts? Moving waste from eg Kingston to Sutton has significant impacts.

Energy from waste has potential but only if done in the right way (clean emissions).

Landfill has to go - methane is worse than CO2 as green house gas and not absorbed by ecosystem.

Thackeray Lane (Croydon) near supermarket (ASDA), dwellings, big shopping centre, not at all a suitable site.

Need one emphasis on rail alternatives for transport of waste (eg bulk up in Kingston and transport by rail to Sutton).

Each borough should deal with its own waste.

Site 122 is opposite a school - this is no good for a waste facility.

Issue: how will these facilities be policed? EA can't seem to do anything. Problem.

The amount of waste should be reduced - spend money on reuse and recycling.

Site of old cement works around 21/97/100 - contaminated - used to burn rubbish at high temperatures.

Corby judgement laid serious responsibilities in councils to check re contamination of land. Concerned that contamination issues are being ignored. Sites with contamination problems/ Croydon had 2 iron smelters - affects site 102 (and north of it). Croydon gasworks and Naphtha plant around site 1/5/125/105/5312.

Japanese cancer stats have doubled since 1945. Don't follow this path. Known as the "cancer era" in Japan. 1945 to 2005 is a public health phenomenon. [Sheet shows graph of incidence of colo-rectal cancer Japan/age related incidence in 2005. Age related incidence in rate in 1975 in 70-80 year olds. Something happened in the environment to cause this increase].

[A diagram drawn by a participant shows neo-natal deaths decreasing from 1974 to 2003, with the development of Croydon gasworks site at around the late 1990s mark].

Where can we put waste facilities? Mitcham suppliers (building suppliers) - its out of the way, can't see it, in the middle of nature, not near houses.

Other British people already accumulated dioxins from fires etc during WWII - danger of overload/disease if dosage increases.

Where should they go? The most sensible place would be existing waste sites.

Why can't we use the existing landfill site once it's filled?

There is no place for any form of incinerator in a truly green area waste plan!!

Site 17 - County skip hire - concerns are mountains of rubbish, dust, odours. Concerned about what waste is dealt with here.

Site 17 - badly managed - smell from County Skip Hire is dreadful. Waste spray used to keep dust down but it doesn't work. Went up in flames 2 weeks ago.

Site 17 - Traffic is dangerous, noise is bad, dust for those with breathing conditions.

Site 17 - Rubbish must be around 40ft high, should it is not be covered as it is rotting.

Site 17 - Children's school is in one village and more traffic would be very dangerous.

Site 18 is a good site - far away from the road, residents.

Site 18 - Look at the Cemex site - we should consider this - it's next to the Viridor site.

Site 46 - Be a bit ridiculous to build something in south London eg site 46 because it's out on a limb. Move business waste is probably produced in central/east of the plan, so perhaps better to have sites in this area.

Site 57 - Wall chart not consistent with main document. Is this part included? [drawing of site area showing southern portion shaded].

Site 100 - Don't want modern, untested technology at Kimpton Way. I agree with it provided the modern treatments are safe.

Site 122 - Beddington Lane (HS Warles?) Next door to Wicks and ASDA. Proposal here to crush concrete. Don't want any concrete crushing here or any waste facilities here - dust, noise, close to houses, more traffic. It's being used now and it shouldn't be.

Wind dispersal areas of energy from waste plant assuming 100ft chimney would encompass Dulwich. Depends on wind direction.

Have you checked roads are suitable for heavy lorries?

Site 491 - Kimpton - good site for waste management facilities, good transport links, it's the most central location for household waste.

Site 491 - Can't understand how you can comment on sites if you don't know what's going on them? For instance site 491 - MRF would be acceptable; incinerator might not be (depending on emissions).

Site 491 - Resident - did get a letter with maps etc (living near 491).

Site 533 - Within 37m of residents 1234 (**Bree/Marg Rd?**) Dust and operation would affect tram track platforms. Council is already in consultation on this site for use of waste from Kampton Road c/a site.

Site 533 - In allowing these sites the council is guilty of public nuisance and in breach of its duty of care under the environmental protection act.

Anything on the application for 112 Beddington Lane? Nothing here about added traffic impacts.

Prevailing winds take fumes from Beddington area across residential areas to NE of sites (sewage and waste smells).

Have ASDA etc between Factory Lane and Beddington Lane. Both would be affected by the potential sites.

100 to 1 odds on Beddington being closed.

Beddington not an industrial area to us - ASDA etc it where we go to eat!

What are the alternatives to Beddington Lane? Sutton has great bulk of sites across the 4 boroughs.

Beddington area used to be wetlands - where does the rain go now? [second comment on sheet says: drains into Wandle into the Thames].

Beddington is an industrial area not a dumping ground.

This whole consultation process is just one big con! Beddington Lane has already been identified as the victims - the only sites where there are no deliverability constraints. For once think of the problems! We already suffer and consider those living in this already blighted area thanks to decisions made in the past!!

Beddington has got enough - take it elsewhere.

Beddington Farm Bird Group - site of metropolitan importance so opposed original recycling site (18). Initial permission given to Thames Waste said site 18 would be wet grassland. But has been turned into recycling plant - impact on birds. Viridor dragging their feet on area to west of site 18. Site 57 - metropolitan open land. Nationally important bird species - tree sparrow - 95% decline. According to RSPB. Other important species - reed w. Site 18 has permission to 2023 initially, but likely to be extended late.

Beddington Farm Bird Group vision (see website) see wildlife protected site in this area, to be a resource for local schools etc as already done in Barnes.

Beddington Lane is not only an industrial area. There are people living here as well. Everyone seems to forget that people live here.

Beddington sites already safeguarded as waste sites. Sites have already expanded. Viridor donate money to council to get their way.

Beddington - concerned that existing sites will be given 'carte blanche' to do what they want.

Beddington - Viridor landfill sites has already killed poplars on the edge of Beddington Park. Nuisance from flies and seagulls.

Beddington - Houses between 533 and 534 are just surrounded - how much will these houses be worth?

Beddington - County Skip Hire, Viridor, 77 Demolition have moved in since 2003, everything focussed on Sutton.

Beddington looks bound to go ahead because everything is in place here already. Feel powerless to oppose it. Would prefer to see fair spread across all the boroughs.

Beddington - Voices from 80 houses in Beddington just won't be heard.

Beddington - Sutton, Merton and Croydon already use Viridor in Beddington Lane. All that will happen is adding Kingston in.

Beddington village is a conservation area - should be protected.

Beddington Lane is suffering saturation already from traffic and recycling sites.

Beddington village can be saved if all nominated sites adjacent to Beddington Lane use Coomber Way specifically built for HGV traffic (not at present being used).

Beddington - Are there any plans for incinerators in Beddington Lane?

Beddington - London Road - Planning permission for landfill (1996) for Thames Waste promised site would be level. Now have planning permission to go up to 160 feet - why? (next to Beddington Park).

On Beddington Lane - sites are poorly regulated on Beddington Lane such as County Skips and I cannot see that any new facilities will also be properly regulated.

Existing planning permission Beddington Lane landfill: Why have we allowed waste from all the other boroughs to landfill in Beddington Lane? Cell 1, Cell 2 already used - Cell 3 excavation is just starting.

Beddington - The duty of care to residents on Beddington Lane is as good as neglected by Sutton Council.

Beddington - Waste not being covered properly - smell, nuisance on Beddington Lane.

Beddington - More concerned about traffic than fumes from incinerator - there's been enough in Beddington Lane.

Sites 532 etc - Beddington Lane - Enough waste management in this area already. Coomber Way built to take the heavy traffic, instead Beddington Lane. County Skips are the worst using Beddington Lane. But trucks still use Beddington Lane (residents on Mt Pleasant) concerned that sites are coming closer to residents.

Beddington - no more lorries through the village. Enough is enough (Beddington). We have a right to a quality life and to breathe clean air.

Spark Farm Primary School - children at risk from Beddington Lane traffic (child killed some years ago).

Beddington Lane - Resident with respiratory problem. Concerned about site 17 type dust problems could come closer to him.

Beddington Lane too narrow for the traffic.

Beddington - Concerned about potential compulsory purchase of houses in Beddington Lane?

Beddington - Whole Beddington Lane area too congested!

Beddington - Existing waste facilities out of control and causing nuisance.

Beddington Residents Association - have a report from London Air Quality - already over council limits at particular times of day. Very against any further proposals for Beddington Lane.

Beddington - Landfill planning consent stipulated that lorries should use Coomber Way - but they don't. They come down Beddington Lane (even at 5pm).

Beddington - Need better enforcement of planning conditions.

Site 533 - Brockmead Road residents - site very close to these houses. Southern portion of 533 (south of railway) is very close.

Sites 533, 534 - smell! dust!

Sites 533, 534, 532 - Brockmead Residents and Oakmead Road would be surrounded by sites.

Sites 5312 and 538 - are very close to primary school which has just been extended to a children's' centre. Also close to residents in Beddington village.

