

# Lambeth Local Plan

## Waste Evidence Base

London Borough of Lambeth

November 2013

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## Executive Summary

This document presents evidence on waste to support the preparation of the Lambeth Local Plan. This is a final report published to coincide with pre-submission publication of the Lambeth Local Plan Proposed Submission in November 2013. It builds on the interim report published in February 2013, prior to public consultation on the Draft Lambeth Local Plan 2013 in March-April 2013.

Lambeth's Local Plan must be in general conformity with the London Plan 2011. This includes addressing the London Plan waste apportionment, which requires Lambeth to find capacity to manage 313,000 tonnes of waste per annum within its borders by 2031.

An assessment of existing waste management and transfer sites in the borough shows that Lambeth has a shortfall in waste management capacity to 2031 of 221,433 tonnes per annum. This equates to approximately 2.8 hectares of land.

No major waste facilities are expected to come forward in the borough in the period to 2031 but there is scope for a number of smaller facilities to serve the needs of the commercial waste sector. Lambeth would welcome growth in this type of business in the borough, both as a contribution to meeting sustainable waste management objectives and to help develop and diversify the local economy and create jobs.

Lambeth does not propose to allocate specific sites for future waste management use. Instead, Lambeth's Key Industrial Business Areas (KIBAs) are identified as the most appropriate areas for additional waste management facilities and these cover over 47 hectares. Lambeth Local Plan Proposed Submission policies support the location of waste management uses in all KIBAs as well as on-site waste management facilities for major developments. Changes in total waste management capacity in the borough will be reported in the authority's monitoring report.

Lambeth acknowledges that, in 2011, some 75 tonnes of commercial and industrial waste, plus 17,000 tonnes of construction, excavation and demolition waste, was exported to landfill sites outside London. Most of the waste planning authorities receiving this waste wish to limit the amount of waste imported from London to their areas, and to reduce landfill capacity. Lambeth has sought to engage with these receiving authorities to consider implications for the council's emerging planning policies. The outcome of this engagement is reported in Appendix 7.

In addition, Lambeth continues to work with the London Regional Technical Advisory Body and London Waste and Recycling Board, supporting initiatives that enable waste to be managed sustainably within Greater London.

## 1. Introduction

- 1.1 This document summarises the current position with regard to waste collection and disposal in Lambeth, and sets out the evidence to support the approach to waste in the Lambeth Local Plan Proposed Submission. In particular, it addresses the London Plan 2011 waste apportionment, the duty to co-operate and national planning policy for waste.
- 1.2 This document updates and replaces the Interim Waste Evidence Base February 2013, published to support public consultation on the Draft Lambeth Local Plan in March-April 2013. It includes updated information where relevant, and reports and takes account of the outcome of engagement with other waste planning authorities and agencies under the duty to co-operate.

## 2. London Plan waste apportionment

- 2.1 The London Plan 2011 seeks to manage as much of London's waste within London as practicable, working towards managing the equivalent of 100 per cent of London's waste within London by 2031 (policy 5.16). This policy addresses the requirements of Planning Policy Statement 10 and the EU Waste Framework Directive 2008. In order to implement this policy, the London Plan apportions waste management capacity to each London borough over the plan period, for municipal and commercial and industrial waste. Boroughs must address this apportionment in their local plans in order to be in general conformity with the London Plan.
- 2.2 Policy 5.17 states that land to manage borough waste apportionments should be brought forward through:
  - a) protecting and facilitating the maximum use of existing waste sites, particularly waste transfer facilities and landfill sites
  - b) identifying sites in strategic industrial locations
  - c) identifying sites in locally significant employment areas
  - d) safeguarding wharves with existing or future potential for waste management
- 2.3 Lambeth's waste apportionment, as set out in table 5.3 of the London Plan 2011, is as follows (in tonnes per annum):

**Table 1: London Plan 2011 – Lambeth waste apportionment**

Year	Municipal solid waste	Commercial and industrial waste	Total
2011	70,000	125,000	195,000
2016	85,000	136,000	222,000
2021	102,000	149,000	250,000
2026	119,000	162,000	281,000
2031	137,000	176,000	<b>313,000</b>

Source: London Plan 2011 table 5.3

2.4 This figure is based on total projected waste arisings for Lambeth of 342,000 tonnes per annum by 2031, made up of 180,000 tonnes of municipal waste and 162,000 tonnes of commercial and industrial waste (London Plan 2011 table 5.2). It is noted that some waste planning authorities outside of London consider the projected waste arisings in the London Plan to be out of date. The GLA has said that it will revisit these projections in the further alterations to the London Plan, to be published in draft in early 2014. It is not known whether this will affect the borough level waste apportionment. Lambeth’s local plan must be in general conformity with the London Plan; Lambeth does not have scope to vary these figures independently of the GLA.

2.5 In order to identify the quantity of land required for waste management in Lambeth to address the London Plan apportionment, this report sets out the following information:

- assessment of current waste collection and disposal arrangements in Lambeth (section 5)
- assessment of the capacity of existing waste management and transfer facilities in the borough (section 6)
- calculation of the additional waste management capacity required within Lambeth over the plan period (section 8)
- assessment of potential locations for additional waste management facilities within Lambeth (section 9 and appendix 6).

2.6 London Plan paragraph 5.75 states that only waste at waste transfer sites sorted for recycling or composting counts towards meeting the borough’s apportionment target.

### 3. Local Plan policy

3.1 Lambeth adopted its Core Strategy in January 2011. Core Strategy policy S8 safeguards existing waste transfer and management sites for waste management use, unless appropriate compensatory provision is made in appropriate locations elsewhere in the borough in accordance with London Plan policy. It supports additional sites for waste management in Key Industrial and Business Areas and other appropriate locations to provide the

capacity to meet, over the plan period, the borough's waste apportionment set out in the London Plan. The process of identifying land for additional waste management uses was deferred to a subsequent site allocations development plan document. The Core Strategy policy was supported by an evidence base published in March 2010. The borough apportionment figures at the time were derived from the London Plan 2008. These were revised in the London Plan 2011, which was adopted after the adoption of Lambeth's Core Strategy.

- 3.2 Following the publication of the National Planning Policy Framework in March 2012, Lambeth started a process of partial review of its Core Strategy, along with preparation of development management policies and site allocations, in order to produce a single Local Plan for the borough. In November 2013, the council agreed the Lambeth Local Plan Proposed Submission for pre-submission publication starting in December 2013, followed by submission for independent examination in March 2014. The Lambeth Local Plan Proposed Submission addresses the new waste apportionment set out in the London Plan 2011: policy EN7 carries forward the approach in Core Strategy policy S8, safeguarding existing waste management and transfer sites and supporting the location of additional sites for waste management in Key Industrial and Business Areas and other appropriate locations. This is based on the assessment of appropriate locations for additional waste management facilities in the borough set out in this evidence base document.
- 3.3 No specific sites for new waste management facilities are identified in the Lambeth Local Plan Proposed Submission. Instead, broad locations appropriate for new waste management facilities are proposed, along with criteria for assessing new waste management proposals in policy EN7. The reason for this approach is explained in the following sections of this report.

#### 4. Duty to Co-operate

- 4.1 The Localism Act 2011 introduced the duty to co-operate, which came into effect on 15 November 2011. The new duty:
- relates to sustainable development or use of land that would have a significant impact on at least two local planning areas
  - requires that councils set out planning policies to address such issues
  - requires that councils and public bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies
  - requires councils to consider joint approaches to plan making.
- 4.2 Paragraph 156 of the NPPF sets out the strategic issues where co-operation might be appropriate. This includes waste management. Paragraphs 178-181 of the NPPF give further guidance on 'planning strategically across local boundaries' and highlight the importance of joint working to meet development requirements that cannot be wholly met within a single local planning area.

- 4.3 For the purposes of waste planning in the emerging Lambeth Local Plan, the duty to co-operate is considered to be most relevant to authorities that receive waste that arises in Lambeth. Some movement of waste between local authority areas is inevitable given the operation of the market and the geographical spread of waste management facilities. However, issues between authorities may arise in particular where exported waste is disposed of through landfill, rather than being managed further up the waste hierarchy. This will be a specific concern where landfill sites are proposed to close prior to the end of the Lambeth Local Plan period, and/or where planning policies for the relevant waste planning authority seek to restrict the disposal of imported waste in landfill in that area.
- 4.4 Lambeth is an active member of the London Regional Technical Advisory Body (RTAB), which provides a mechanism to liaise with other London waste planning authorities, the GLA, the Environment Agency, and other regional Technical Advisory Boards on waste planning issues. The RTAB is a forum for sharing data, contact details with other waste planning authorities and best practice around the duty to co-operate as it affects waste planning. The information shared through the London RTAB has informed the approach and content of this evidence base document.
- 4.5 Lambeth also participates in the London Waste and Recycling Board (LWARB) in order to work strategically with the Mayor and other London boroughs to increase London's capacity for sustainable waste management in accordance with London Plan policy. For example, Lambeth falls in the area covered by the 'London Re-use Network Central Cluster', which was recently given a £300,000 investment by LWARB to open a re-use workshop facility, launch a borough services hotline and website, and enhance the capability of partners to provide re-use collections in the cluster boroughs.
- 4.6 During the course of the preparation of the emerging Lambeth Local Plan, Lambeth has sought to engage with the principal waste planning authorities that receive waste from Lambeth for management (the London Boroughs of Wandsworth and Bexley) or disposal in landfill (the London Borough of Havering, authorities in the South East and East of England, Wiltshire and Derbyshire) in order to discuss any issues this may present. Section 5 and Appendices 1 and 2 of this document identify the principal waste planning authorities that receive waste from Lambeth, and those in which waste from Lambeth was disposed of through landfill in 2011. Appendix 3 identifies the relevant planning policies for these authorities.
- 4.7 These authorities were contacted at the start of the public consultation on the Draft Lambeth Local Plan in March 2013, both through a general mailing and through specific targeted emails to authorities with a known interest in Lambeth. Links were provided to the relevant documents: the interim waste evidence base and the draft plan itself. In order to encourage as full a

response as possible, the consultation and evidence base were also mentioned at meetings of the London RTAB, which includes a representative of other regional RTABs in the south and east of England, as well as the relevant London boroughs.

4.8 The full list of the waste planning authorities receiving the general mailing about the public consultation on the Draft Lambeth Local Plan, using contact details provided through the London RTAB where available, is as follows. Those marked with an asterisk also received the targeted email on the basis that they were known to have received waste from Lambeth during 2011.

- Cambridgeshire County Council
- Norfolk County Council
- Suffolk County Council
- Hertfordshire County Council
- \*Essex County Council
- Southend
- \*Thurrock Council
- \*Medway Council
- Central Bedfordshire
- Peterborough
- Hampshire County Council
- East Sussex County Council
- South Downs
- Brighton and Hove
- West Sussex County Council
- \*Kent County Council
- \*Buckinghamshire County Council
- \*Milton Keynes Council
- \*Oxfordshire County Council
- \*Surrey County Council
- West Berkshire County Council
- Reading
- Sough
- Royal Borough of Windsor and Maidenhead
- Isle of Wight
- \*Wiltshire County Council
- \*Derbyshire County Council
- London boroughs: \*Bexley, \*Havering, Kensington and Chelsea, Hammersmith and Fulham, \*Wandsworth, Sutton, Hillingdon, Merton and Camden

4.9 As a result of this exercise, comments about waste were received from:

- Surrey County Council
- Oxfordshire County Council

- Kent County Council
- Milton Keynes Council

In addition, comments about waste were received through the general public consultation from the Port of London Authority, the Environment Agency, the Lambeth Food Partnership and the Greater London Authority. All comments received are included in Appendix 7 of this report.

- 4.10 The council emailed the four authorities that responded to the initial contact, attaching a draft schedule setting out Lambeth's proposed response to the representations they had made. Lambeth asked whether the authority in question had any comments or queries on the content of the draft responses schedule, and offered to discuss any issues or queries by phone if that would be helpful. This took place in early August 2013, well before the revisions to the Lambeth Local Plan were finalised and reported to Cabinet in November 2013. This exercise resulted in a further response from three of the four waste planning authorities: Surrey County Council, Oxfordshire County Council and Kent County Council. In general terms, the response was positive and included additional information in some cases, which was helpful to Lambeth. A follow up email was sent to Milton Keynes council in mid September, but no response was received.
- 4.11 Appendix 7 of this report includes the final schedule of all the responses received on the Draft Lambeth Local Plan relating to waste. This sets out each of the comments made, how the council responded and whether any change was made to the plan or the associated evidence base.

## 5. Current waste collection and disposal arrangements in Lambeth

### *Municipal waste*

- 5.1 The London Borough of Lambeth is a statutory waste collection authority, responsible for collecting waste from households and, where requested, businesses. All waste collected by Lambeth is classified as municipal waste. This currently comprises:
- rubbish and recyclable material collected from domestic properties
  - recycling deposited at local recycling points
  - waste delivered to Lambeth's reuse and recycling centre
  - commercial waste collected under contract to the council
  - waste from markets and parks
  - litter and street cleansing wastes
  - waste from gully pots
  - bulky waste
  - healthcare wastes.

- 5.2 A seven year contract to collect municipal waste was awarded by Lambeth to Veolia Environmental in 2007 and this has been extended to run until March 2021. Lambeth's sustainable waste management service has developed a new Municipal Waste Management Strategy 2011-2031, published in April 2011 and reviewed in April 2013, to address the movement of waste collected by the council up the waste hierarchy.
- 5.3 Western Riverside Waste Authority (WRWA) is the statutory waste disposal authority covering the London boroughs of Lambeth, Wandsworth, Hammersmith & Fulham and Kensington & Chelsea. It is responsible for providing arrangements for the disposal of controlled waste collected by its constituent waste collection authorities (the four boroughs). WRWA agreed a joint municipal waste management strategy in June 2006.
- 5.4 A thirty year waste management services agreement (WMSA) was established between WRWA and Cory Environmental Ltd to dispose of WRWA waste, commencing in October 2002 and ending in 2032. Historically, the disposal of non-recycled municipal waste from Lambeth has been to landfill sites outside of London. In the year from April 2009 to March 2010, 80 percent of Lambeth's municipal waste was disposed of at Mucking landfill site in Essex. However, two key facilities have recently been completed that now enable the vast majority of WRWA waste to be managed within London, rather than being exported to landfill. These are:
- A new materials recovery facility (MRF) at the Smugglers' Wharf waste transfer station in the London borough of Wandsworth, operated by Cory Environmental Ltd since September 2010 with capacity for 85,000 tonnes per annum. This will eventually handle all of the dry recyclables collected by the four WRWA boroughs. At present, 21,000 tonnes per annum of Lambeth's municipal waste is processed at the Smugglers' Wharf MRF. This tonnage is anticipated to increase by 0.25 per cent year on year until 2031. The London Borough of Wandsworth has said (meeting February 2013) that there are no issues with the management of this quantity of waste from Lambeth in their borough. It submitted no comments on this issue on the Draft Lambeth Local Plan.
  - The energy from waste (EfW) facility at Belvedere, London Borough of Bexley, which has been receiving all residual waste from WRWA since August 2011. The Belvedere facility has an average annual capacity of 585,000 tonnes and will generate enough electricity to power more than 100,000 homes. All waste inputs from WRWA are delivered by river and off-loaded via a new purpose-built jetty, preventing over 100,000 HGV journeys each year. In the financial year 2012/13, Lambeth sent 95,544 tonnes of residual municipal waste to Belvedere. The London Borough of Bexley has advised (meeting February 2013) that there are no issues as far as it is concerned with the delivery and management of waste from Lambeth at this facility. It submitted no comments on the Draft Lambeth Local Plan.

- 4.2 The principal residue from the Energy from Waste incineration process is Incinerator Bottom Ash (IBA), which amounts to approximately 28 per cent by weight of all the waste processed through the Belvedere facility. This equates to approximately 180,000 tonnes of bottom ash, including metals, are produced each year. This is transported by river to a purpose-built processing facility at Tilbury docks, operated by Ballast Phoenix, where metals are recovered for recycling and the ash is processed into various grades of aggregate used for road building and construction. Further information about the processing and use of IBA can be found in the council's [IBA waste management briefing note \(November 2011\)](#).
- 4.3 Air pollution control residues (APCRs) from the Belvedere facility are stored underground within disused chambers of the Winsford Rock Salt Mine in Cheshire (within the administrative boundary of Cheshire West and Chester Council), in the 'Minosus' facility operated by Veolia Environmental Services. Veolia states that this is the only underground storage facility for hazardous waste operating in the UK and that there is no effect on above ground land uses, which are principally agricultural, for dairy farming. They add that the unique geology in this area of Cheshire creates conditions ideal for the storage of hazardous wastes such as APCR, which would otherwise require treatment prior to disposal in conventional above ground land fill sites. The potential waste deposit capacity at the mine continues to grow as the rock salt is extracted. The area currently permitted for waste represents less than 10 per cent of the existing void.
- 4.4 Table 2 below sets out the amount of municipal waste arising in Lambeth for the financial year 2012/13, and the methods by which it was managed. Table 3 and Figure 1 provide the comparative data for each financial year since 2005/6. These show a levelling off in the overall quantity of municipal waste arising and in the proportion recycled, but a very significant reduction in the last two years in the amount sent to landfill: in 2012/13, the proportion of municipal waste arising in Lambeth and disposed of in landfill was 0.01 per cent. The financial year 2012/13 was the first to reflect the switch to management of 100 per cent of Lambeth's residual municipal waste at the Belvedere facility.

**Table 2: Local Authority Collected Municipal Waste (LACMW) 2012/13**

Source: Lambeth sustainable waste management service 2013

	Landfill	Incineration with EfW*	Recycled	Composted	Other (reused)	Total Waste Arisings
Amount of waste arisings in tonnes	10	95,544	20,622	3,051	172	119,398

\*Energy from Waste

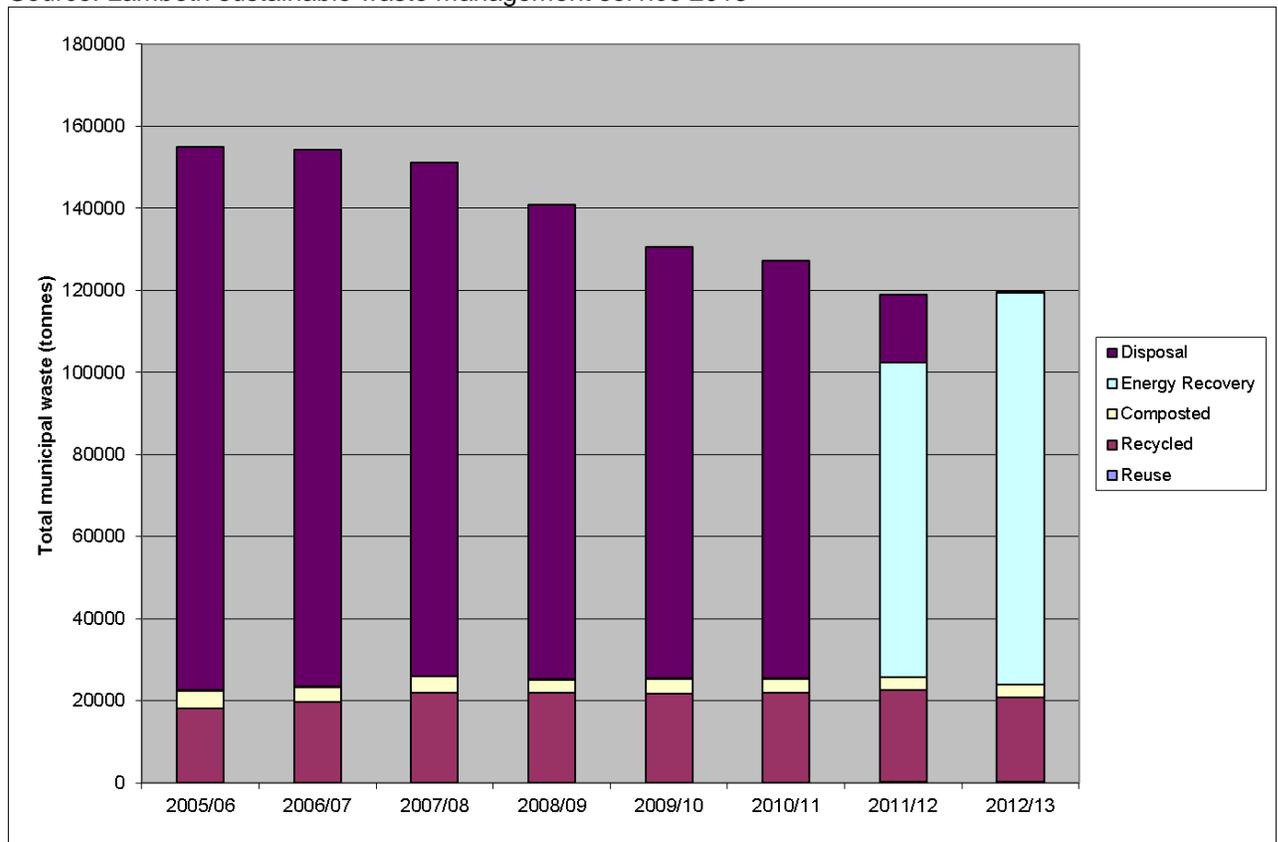
**Table 3: Municipal Waste Management by Type**

Source: Lambeth sustainable waste management service 2013

Total Municipal Waste	Management	Tonnes	%	Total Tonnes
2005/06	Recycling	18,031.41	11.6	<b>154,866.8</b>
	Composting	4,418.34	2.9	
	Energy Recovery	92.89	0.1	
	Disposal	132,324.20	85.4	
2006/07	Recycling	19,694.03	12.8	<b>154,237.51</b>
	Composting	3,630.30	2.4	
	Energy Recovery	219.78	0.1	
	Disposal	130,693.40	84.7	
2007/08	Recycling	22,026.41	15.0	<b>151,224.03</b>
	Composting	3,835.88	3.0	
	Energy Recovery	151.33	0.1	
	Disposal	125,210.41	82.8	
2008/09	Recycling	21,884.51	15.5	<b>141,061.64</b>
	Composting	3,282.17	2.3	
	Energy Recovery	90.42	0.1	
	Disposal	115,623.99	81.9	
2009/10	Recycling	21,608.87	16.5	<b>130,815.97</b>
	Composting	3,756.23	2.9	
	Energy Recovery	75.40	0.1	
	Disposal	105,218.98	80.4	
2010/11	Recycling	21,845.07	17.1	<b>127,457.77</b>
	Composting	3,508.64	2.8	
	Energy Recovery	48.10	0.1	
	Disposal	101,862.20	79.9	
2011/12	Recycling	22,428.36	18.8	<b>119,049.18</b>
	Reuse	182.02	0.2	
	Composting	3,079.18	2.6	
	Energy Recovery	76,635.59	64.4	
	Disposal	16,724.02	14.1	
2012/13	Recycling	20,622	17.3	<b>119,398</b>
	Reuse	172	0.1	
	Composting	3,051	2.6	
	Energy Recovery	95,544	80.0	
	Disposal	10	0.0	

**Figure 1 - LB Lambeth Municipal Waste Management by Type 2005/06 – 2012/13**

Source: Lambeth sustainable waste management service 2013



5.7 The only element of municipal waste for which the WMSA does not provide treatment facilities is food waste. At present, Lambeth operates a single collection round servicing 10,841 households. This waste is treated at the aerobic digestion facility in Mitcham operated by Bio-Collectors Ltd. As part of Lambeth’s [waste strategy review 2013](#), the service will be rolled out to all street-level households during November 2013 and a new contract is being tendered to allow the food waste to be co-collected with garden waste and disposed of as a single waste stream; and a community-based waste composting scheme will be offered for estates, alongside measures to reduce contamination and increase participation in recycling.

*Commercial and industrial waste*

5.8 General waste generated by businesses and handled by commercial waste operators is classified as commercial/industrial waste. The London Plan projected that 151,000 tonnes of commercial and industrial waste would be generated in Lambeth in 2011 and that this will increase to 162,000 tonnes by 2031 (London Plan 2011 table 5.2).

5.9 The council currently collects commercial waste from around 1,400 premises under its refuse collection contract. In 2012/13, this amounted to

9,808 tonnes of refuse and a further 160 tonnes of recycling, which together represents less than 8 per cent of the total projected quantity of commercial and industrial waste arising in the borough in 2011. The commercial and industrial waste collected under contract by the council is managed as part of the municipal waste stream (see above).

- 5.10 There is no comprehensive information about which companies collect the rest of the commercial and industrial waste in Lambeth. This is undertaken by many companies, with several end routes.
- 5.11 The Environment Agency waste data interrogator provides some information about the quantity of commercial and industrial waste arising in Lambeth that was disposed of in landfill sites in 2011. (Data for later years were not available at the time of writing.) This is set out in Appendix 1. In summary, 0.12 tonnes of commercial and industrial waste was disposed of at the Gerrards Cross landfill site in Buckinghamshire and 74.68 tonnes at the Redhill landfill site in Surrey during 2011. It is acknowledged that there are some limitations to the Environment Agency data, but this is nevertheless the best source of information about waste exported to landfill currently available.

*Construction, excavation and demolition waste*

- 5.12 Construction, excavation and demolition (CED) waste arises from development and building work and the council has limited involvement in its management. London Plan policy 5.18 encourages new CED waste management facilities at existing waste sites, including safeguarded wharves, and seeks to ensure that major development sites are required to recycle CED waste on-site wherever practicable, supported through planning conditions. It states that the boroughs should require developers to produce site waste management plans to arrange for the efficient handling of CED waste and materials. This requirement is addressed in Lambeth Local Plan Proposed Submission policies EN7 Sustainable waste management and T8 Servicing.
- 5.13 The London Plan (paragraph 5.88) states that re-use and recycling rates for CED waste in London are already high, estimated at 82 per cent in 2008. Nevertheless, the Mayor sets a target in Policy 5.16 to increase this to 95 per cent by 2020. The Mayor supports more beneficial and higher order uses of inert CED waste. He states in the London Plan that a combination of on-site mobile facilities on construction sites, effective use of existing waste processing sites and, where appropriate, safeguarded wharves, and the provision of recycling facilities at aggregate extraction sites, should be capable of meeting the anticipated future requirement within London to achieve a more beneficial re-use of this material.
- 5.14 Information about this waste stream in Lambeth is available from the Environment Agency (EA) waste data interrogator for 2011, although the

limitations of this data source are acknowledged. The EA data on inert (non-hazardous) Lambeth CED waste to landfill is summarised in Appendix 1; and on hazardous Lambeth CED waste to landfill in Appendix 2. This shows that CED waste was the principal type of waste exported to landfill from Lambeth to other waste planning authorities in 2011. In all in that year, just over 17,000 tonnes of CED waste from Lambeth was exported to landfill sites in eleven different waste planning authority areas in the South East and East of England, Wiltshire and Derbyshire. Of this, 16,143.03 tonnes was inert (95%) and 867.81 tonnes was hazardous (5%).

- 5.15 It is acknowledged that many of the landfill sites in which Lambeth waste was disposed in 2011 have a limited life and are scheduled to close prior to the end of the plan period for the emerging Lambeth Local Plan (2030/31). Information about planned closure dates of landfill sites, where known, is included in Appendix 1. It is also acknowledged that planning policies for the relevant waste planning authorities seek to limit the extent to which waste from London is disposed of in landfill in these areas (see Appendix 3). Lambeth has sought to strengthen its emerging local plan waste policy to exercise as much control as it can through the planning process over the export of CED waste outside of London.

#### *Hazardous waste*

- 5.16 Hazardous waste includes asbestos, pesticides, fluorescent tubes, oils, some paints, some household and car batteries, and some discarded electrical equipment such as TVs and computer monitors, fridges and freezers.
- 5.17 In Lambeth, some of this waste is collected as municipal waste via the Vale Street re-use and recycling centre and the council's bulky waste collection service, and disposed of in accordance with the regulations governing hazardous waste as part of the contract between WRWA and Cory Environmental. In addition, the council buys services from the London wide hazardous waste service, which is administered by the Corporation of London on behalf of all London boroughs (with the exception of Hillingdon). This provides for the collection of small quantities of asbestos and chemical waste from households, registered charities, schools and council offices. The service employs two separate contractors: Biffa for asbestos and CSG Lanstar for chemical collections. Collections from businesses can also be carried out by this service, but at a commercial charge.
- 5.18 Data on hazardous CED waste (where asbestos and other dangerous substances are involved) is summarised in paragraph 5.14 and Appendix 2.
- 5.19 The Mayor has developed a hazardous waste report for London, which will help inform the further alterations to the London Plan in relation to hazardous waste management capacity in the capital. The Mayor is also working with London's waste planning authorities, UK regions and the

London Waste and Recycling Board to explore opportunities for diverting more of London's hazardous waste to treatment and recovery activities to help reduce reliance on landfills in the regions.

### *Clinical waste*

- 5.20 Clinical waste includes any waste which consists wholly or partly of human or animal tissue, blood or bodily fluids, excretions, drugs or other pharmaceutical products, swabs or dressings, syringes, needles or other sharp instruments, which unless rendered safe may prove hazardous to any person coming into contact with it. Clinical waste is mainly produced by hospitals, health clinics, doctors' surgeries and veterinary practices, but also comes from residential homes, nursing homes and private households.
- 5.21 The council provides a clinical waste collection service to households. This, and clinical waste collected through the council's street cleansing service, are disposed of through the contract between WRWA and Cory Environmental.
- 5.22 The council does not provide a commercial clinical collection service. Businesses producing clinical waste must provide a declaration as to whether the waste is hazardous, and if so must provide a hazardous waste consignment note under the provision of the Hazardous Waste (England) Regulations 2005. Commercial clinical collection services are provided by a small number of specialist companies in London. NHS premises in Lambeth also make their own arrangements for the collection and disposal of clinical waste with specialist contractors.

## 6. Existing waste management and transfer facilities in Lambeth

- 6.1 All currently operational waste management facilities in Lambeth are listed in Appendix 4. The capacity of these facilities in tonnes per annum has been calculated as 75 per cent of the maximum licensed capacity (where known from Environment Agency information) or the current throughput – whichever is larger. The total capacity of existing waste management facilities in Lambeth is 10,767 tonnes per annum. The total area of these sites is 0.54 hectares.
- 6.2 Existing waste transfer facilities are listed separately in Appendix 5. These sites are not currently in waste management use but are safeguarded for waste management use by Core Strategy policy S8 and Lambeth Local Plan Proposed Submission policy EN7 (in accordance with London Plan policy 5.17). The total area of existing waste transfer sites is 1.01 hectares. The estimated waste management capacity of these existing waste transfer sites in Lambeth is 80,800 tonnes per annum (based on an assumed throughput of 80,000 tonnes per hectare).

6.3 The total capacity of land currently safeguarded for waste management use in Lambeth is therefore estimated to be **91,567 tonnes per annum**. The total area of these sites is 1.55 hectares

6.4 Each of the existing waste management and transfer sites is assessed more fully in Appendices 4 and 5. This assessment includes site plans.

## 7. Current waste operators in the borough

7.1 The council has a contract with Veolia Environmental Services which was awarded in April 2007 for a period up to 31 March 2014 (with an option to extend until 31 March 2021). The contract relates to the provision of refuse and recycling collections, street cleansing and ancillary services.

7.2 Veolia Environmental is based at three council-owned depot sites in Lambeth: the Mahatma Gandhi Industrial Estate in Milkwood Road; the Angela Davis Industrial Estate in Somerleyton Road; and the Shakespeare Road Depot. These sites are used for operational purposes (storage of the waste fleet and associated equipment) and are not waste management or transfer sites.

7.3 The council's re-use and recycling centre (RRC) is based at Vale Street, operated by Veolia Environmental, and is the most significant waste management site currently in the borough in terms of capacity. This site is the subject of site allocation 3 in the Lambeth Local Plan Proposed Submission: the preferred use is for education (a primary school) and/or housing, with retention of the RRC or re-provision on a suitable site elsewhere in the borough. This provides potential to upgrade and improve the RRC facility.

7.4 In September 2010, the council's planning service sought to engage with other waste operators in the borough and wider area, in order to gauge future plans and views about the identification of sites for future waste management use. The firms contacted were:

- SITA UK – operating from Shakespeare Wharf, Shakespeare Road: no plans in the short term to move from the site.
- Powerday Plc – at that time exploring potential to expand their current waste transfer operation at Belinda Road to include waste management, subject to resolving access difficulties.
- Cory Environmental - operate a waste facility within LB Wandsworth on the borough boundary and hold a 30 year contract with WRWA; no current plans to locate facilities within Lambeth.
- Biffa Waste Services - run a waste facility within LB Wandsworth on a site adjoining the borough boundary. No response received.

- 7.5 The council has also had discussions with OCS, owner and operator of a facilities management company at 44 Clapham Common Southside. This operation includes an ancillary waste transfer use operated by Cannon Hygiene Ltd. OCS has advised that the company is exploring a possible re-location from the site. There are no plans to expand or consolidate the existing ancillary waste management facility on the site.
- 7.6 All the operators with whom contact was made emphasised the need to allow for flexibility in identifying new land for waste management use. A number suggested that preference should be given to identifying broad locations or areas appropriate for waste, rather than specific sites, in order to achieve this flexibility. Waste operators explained that this would enable them to locate on appropriate sites as and when they become available and when needed, rather than directing them to sites that do not meet their specific operational requirements or that may never become available due to site ownership or other reasons.
- 7.7 Overall, in light of these discussions with waste operators, there are no known plans for significant new waste management facilities in Lambeth over the next 15 years.
- 7.8 The only known new waste management facilities likely to come forward in Lambeth at this time are smaller scale. The GLA has advised that, in addition to the LWRB investment mentioned in paragraph 4.6 above, there are ongoing discussions for further investment to boost the collection infrastructure in the Western Riverside Waste Authority area by the creation of a new project in Brixton called the Remakery, which will cover catchment in Lambeth. In addition, the former re-use charity FAST is seeking new premises either in Lambeth or Southwark.

## 8. Additional waste management capacity required

- 8.1 As a result of the 30 year WMSA between WRWA and Cory Environmental Ltd, no additional waste management facilities are required for municipal waste in Lambeth during the period of the emerging Lambeth Local Plan.
- 8.2 The remaining requirement is likely to be for facilities to manage commercial and industrial waste collected and disposed of by commercial operators. The provision of these facilities will be market-led, within the parameters of the land made available by the Lambeth Local Plan. It is acknowledged that waste facilities can in principle be suited to industrial sites in urban areas as the recycling and processing of waste is increasingly being carried out within modern, purpose-designed buildings that can be located in these areas. However, as explained in section 7, there are currently no known plans for significant new waste management facilities in Lambeth.

- 8.3 There is currently a **shortfall of 221,433 tonnes per annum** between the capacity of existing safeguarded waste sites in Lambeth and the London Plan apportionment to 2031.
- 8.4 The GLA has advised that 80,000 tonnes per hectare is likely to be economically viable as a level of waste throughput on new waste management sites. This figure has therefore been used to calculate the amount of land required to meet the shortfall in waste management capacity in Lambeth. Assuming all of Lambeth's waste apportionment is met within Lambeth, and based on an average waste management ratio of 80,000 tonnes per hectare, the shortfall in capacity equates to **2.8 hectares** of land.
- 8.5 Given that a significant proportion of Lambeth's municipal waste is already managed in the London Boroughs of Wandsworth and Bexley and that this arrangement is expected to continue for the 15 year period of the emerging Lambeth Local Plan, Lambeth has held discussions with these authorities about the scope to share surplus waste apportionment.
- 8.6 In February 2013, Wandsworth advised that there is no surplus waste apportionment available in that borough.
- 8.7 Bexley is party to the South-East London boroughs' joint waste technical paper. This shows a projected surplus of 76,084 tonnes per annum for the sub-region (plus the City of London) by 2031. Bexley has advised (February 2013) that scope to share this surplus waste apportionment could only be considered in relation to the four Western Riverside Waste Authority boroughs together, given that their municipal waste is managed jointly. At present, no joint approach of this nature has been made.
9. Proposed locations for additional waste management uses in Lambeth
- 9.1 In light of the comments from waste operators and the fact that there are no known plans for significant new waste management facilities in Lambeth over the next 15 years, it is not proposed to allocate specific sites for new waste management uses. The council considers that this approach would unduly restrict the market for land and place an unreasonable burden on land-owners, resulting in the potential blight of sites which are not necessarily deliverable. Instead, the council proposes to identify broad locations appropriate for new waste management uses.
- 9.2 Lambeth does not have any Strategic Industrial Locations as defined in the London Plan. Instead Lambeth's planning policies protect locally significant industrial sites in the form of its designated Key Industrial and Business Areas (KIBAs). Lambeth Local Plan Proposed Submission policy ED1 states that the "development in KIBAs will be permitted only for business, industrial, storage and waste management uses, including green industries and other compatible industrial and commercial uses (excluding large scale retail) ancillary to, or providing for, the needs of the KIBA". This carries

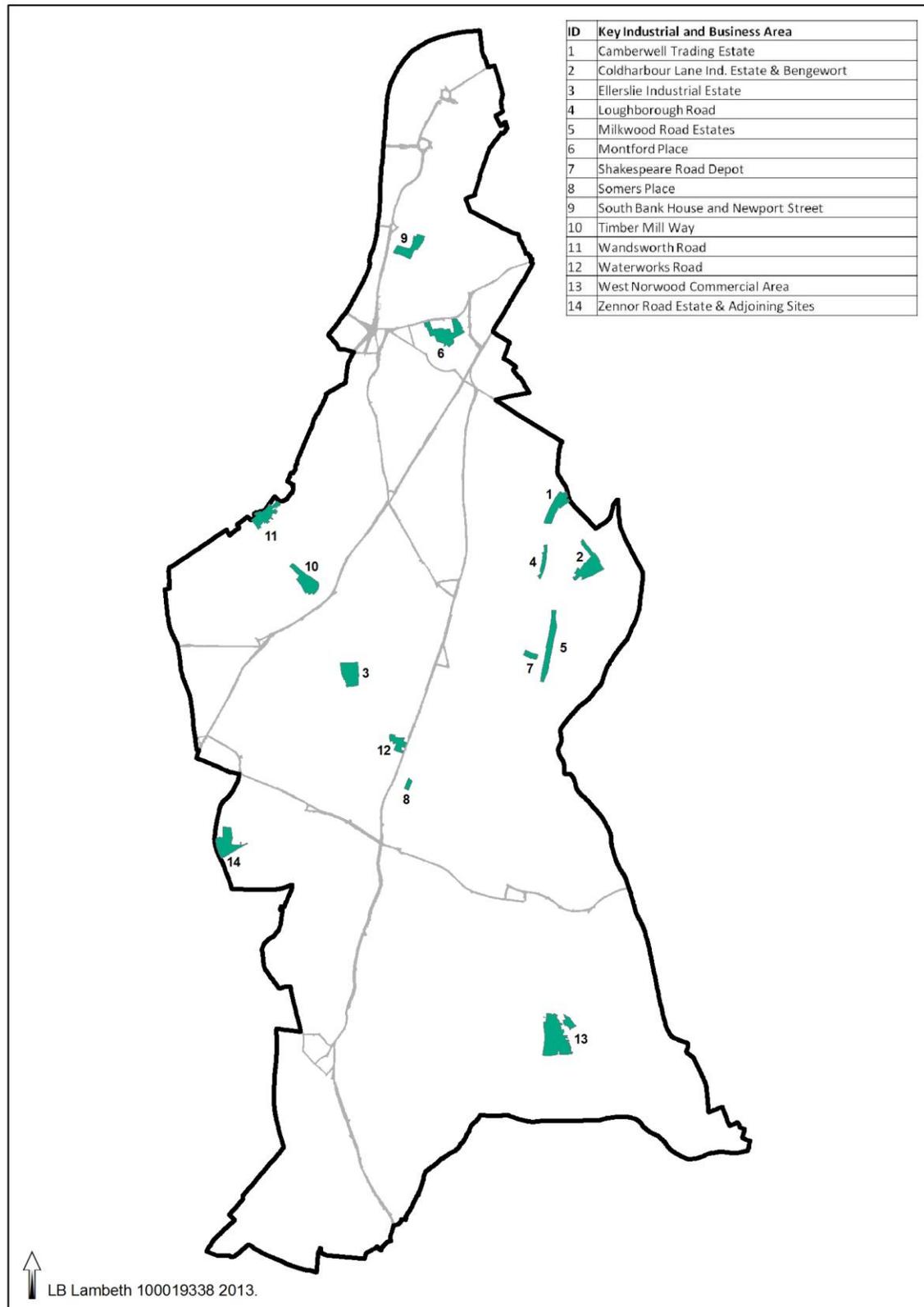
forward the policy approach to KIBAs in the Core Strategy 2011, although the previous exception for schools will no longer apply.

- 9.3 Lambeth's KIBAs therefore represent the primary area of search for additional land for waste management use to meet the London Plan waste apportionment. Together, the KIBAs (including boundary changes and new KIBAs proposed as part of the Lambeth Local Plan Proposed Submission) account for 47.6 hectares of land, which is more than enough land in principle to accommodate the 2.8 hectares required to accommodate the London Plan waste apportionment to 2031. Map 1 shows the distribution of all twenty-eight KIBAs in Lambeth (as listed in the Lambeth Local Plan Proposed Submission).
- 9.4 Lambeth's KIBAs vary in character and mix of uses (see the KIBA Survey 2012). Whilst all of them are appropriate locations for new waste management uses in principle, some are considered to be particularly suited to this type of use. An assessment has therefore been undertaken of the designated KIBAs in order to identify a list of those considered most appropriate for new waste management uses. The results of this assessment are set out in Appendix 6.
- 9.5 In summary, fourteen KIBAs are considered most appropriate for new waste management uses. These are:
- Camberwell Trading Estate and adjoining sites
  - Coldharbour Lane Estate and Bengeworth Road Depot
  - Eilerslie Industrial Estate
  - Loughborough Road
  - Milkwood Road Estates
  - Montford Place – Beefeater/Oval Gasworks
  - Shakespeare Road Depot
  - Somers Place
  - Southbank House and Newport Street
  - Timber Mill Way
  - Wandsworth Road
  - Waterworks Road
  - West Norwood Commercial Area
  - Zennor Road Estate and adjoining sites
- 9.6 The distribution of these fourteen KIBAs is shown on Map 2.

Map 1: Distribution of all KIBAs in Lambeth (as listed in the Lambeth Local Plan Proposed Submission)



Map 2: KIBAs considered most appropriate for new waste management uses



## 10. Conclusion

- 10.1 Lambeth has a shortfall in waste management capacity over the period of the London Plan 2011 and the emerging Lambeth Local Plan. This shortfall equates to approximately 2.8 hectares of land.
- 10.2 Whilst there are no major waste facilities expected to come forward in the borough in the period to 2031, there is scope for a number of smaller businesses to locate in the borough to serve the needs of the commercial waste sector (including potential third sector operators such as furniture re-use charities). Lambeth would welcome growth in this type of business in the borough, both as a contribution to meeting sustainable waste management objectives and to help develop and diversify the local economy and create jobs.
- 10.3 In the absence of major new waste facilities in the planning pipeline, Lambeth does not propose to allocate specific sites for future waste management use in the borough. Instead, Lambeth's Key Industrial Business Areas (KIBAs) – its locally significant industrial areas - are identified as the most appropriate location for future waste management facilities. Together, these cover 47.6 hectares of land (as defined in the Lambeth Local Plan Proposed Submission), which is more than enough in principle to accommodate future waste management requirements to 2031. Of these KIBAs, fourteen are considered to be particularly appropriate for waste management uses. Lambeth Local Plan Proposed Submission policy ED1 supports the location of waste management uses in all KIBAs.
- 10.4 Any applications for future waste management uses, whether within or outside of KIBAs, will also be assessed against the criteria set out in Core Strategy policy S8, and subsequently in emerging Lambeth Local Plan policy EN7, to ensure that potential impacts on the surrounding environment and residential amenity are adequately addressed.
- 10.5 Changes in total waste management capacity in the borough will be reported in the authority's monitoring report.
- 10.6 Lambeth acknowledges that in 2011 some 75 tonnes of commercial and industrial waste, plus 17,000 tonnes of construction, excavation and demolition waste, were exported to landfill sites outside London (Environment Agency Waste Data Interrogator 2011). These figures will continue be monitored as data are made available. Lambeth also acknowledges that most of the waste planning authorities receiving this waste wish to limit the amount of waste imported from London to their areas, and to reduce landfill capacity. Lambeth has sought to engage with these receiving authorities to discuss these issues more fully and consider

implications for the council's emerging planning policies. The outcome of these discussions is summarised in this report.

- 10.7 In addition, Lambeth will continue to work co-operatively with the London RTAB and London Waste and Recycling Board and support initiatives that enable waste arising in Lambeth to be managed within Greater London, if not in Lambeth itself. Lambeth's existing and emerging planning policies have been designed to meet this objective.

Appendix 1 – Waste from Lambeth exported to landfill in 2011

Receiving Waste Planning Authority	Landfill Site Name	Operator	Basic Waste Category	Tonnes Received	Current year of closure of landfill site
London Borough of Havering	Rainham Landfill	Veolia ES Landfill Limited	Inert/construction and demolition	49.20	2018 with application to extend to 2024
Thurrock Council	East Tilbury Quarry	S Walsh And Son Ltd	Inert/construction and demolition	3308.38	2016
Thurrock Council	Ockendon Area II & III Landfill	Veolia ES Landfill Limited	Inert/construction and demolition	707.30	closed
Buckinghamshire County Council	Park Lodge Landfill	Brett Aggregates Limited	Inert/construction and demolition	334.00	2013
Buckinghamshire County Council	Gerrards Cross Landfill Site	Veolia ES Landfill Limited	Household/commercial/industrial	0.12	2017
Essex County Council	Pitsea Landfill	Veolia ES Landfill Limited	Inert/construction and demolition	52.82	2015
Milton Keynes Council	Bletchley Landfill Site	WRG Waste Services Ltd	Inert/construction and demolition	15.88	2022
Medway Council	Hoo Island	Port Of Sheerness Ltd	Inert/construction and demolition	6870.00	Closed for London; receiving port waste only to 2020
Kent County Council	Margetts Pit SNRHW Landfill	Aylesford Newsprint Services Ltd	Inert/construction and demolition	3262.01	2012 with application to extend to 2016 (see note 3 below)
Surrey County Council	Home Farm South Landfill	Brett Aggregates Limited; Tarmac Limited	Inert/construction and demolition	260.00	2015
Surrey County Council	Redhill Landfill (North East Quadrant)	Biffa Waste Services Ltd	Inert/construction and demolition	1283.44	2030 (see note 2 below)
Surrey County Council	Redhill Landfill (North East Quadrant)	Biffa Waste Services Ltd	Household/commercial/industrial	74.68	2030

Source: Environment Agency Waste Data Interrogator 2011 plus WPA and waste operator websites for landfill site years of closure

Notes:

1. Surrey County Council advises that an additional 16 tonnes of construction and demolition waste was exported from Lambeth to Epsom Chalk Pit in 2011.

2. Surrey County Council advises that Pattleson Court Landfill (Redhill Landfill) receives over 300,000 tonnes of waste annually from London and it is coming under increasing pressure as non-hazardous landfills continue to close at a rapid rate and waste planning authorities neighbouring Surrey pursue policies discouraging further non-hazardous landfill provisions in their emerging waste local plans. Furthermore, the annual capacity of Pattleson Court Landfill will fall by around a third from 2015 when a more vigorous movement limit comes into force due to capacity constraints at a nearby junction, which are not capable of being overcome.
3. Kent County Council advises that the CDE wastes, which arise in Lambeth and are landfilled at Margetts Pit, bypass a number of inert landfills in Kent on the way to final disposal. This disposal does not pose any significant issue for Kent's emerging strategy as the issue it seeks to address is how to ensure that the existing permitted quarries, which require backfilling to achieve satisfactory restoration, are actually restored.

Appendix 2 – Hazardous waste from Lambeth exported to landfill in 2011

Class of waste	Receiving waste planning authority	Tonnage
insulation materials containing asbestos	Kent County Council	77.26
other insulation materials consisting of or containing dangerous substances	Kent County Council	0.07
construction materials containing asbestos	Kent County Council	153.88
batteries and accumulators	Kent County Council	0.05
construction materials containing asbestos	Oxfordshire County Council	1.02
insulation materials containing asbestos	Surrey County Council	1.60
soil and stones containing dangerous substances	Wiltshire County Council	124.40
insulation materials containing asbestos	Wiltshire County Council	1.68
construction materials containing asbestos	Wiltshire County Council	496.00
construction materials containing asbestos	Derbyshire County Council	11.90

Source: Environment Agency Hazardous Waste Data Interrogator 2011

Notes:

1. Kent County Council (KCC) advises that it is likely that the CDE waste containing asbestos, which has arisen in Lambeth and is managed in Kent, is being landfilled in Pinden Quarry in Dartford. From KCC's point of view, the continuation of this hazardous landfill is important to maintaining net self-sufficiency in hazardous waste management capacity, as Kent exports as much hazardous waste as it imports. There is also a need for this chalk quarry to be extended and this extension will be allocated in both KCC's minerals and waste sites plans. This should ensure the continuation of this asbestos facility for the life of the KCC plan, up to 2030. Therefore, KCC advise, the importation of asbestos waste from Lambeth does not present any issues for its emerging waste strategy.
2. Oxfordshire County Council advises that the small amount of hazardous waste disposed of in Oxfordshire in 2011 was probably sent to the Ardley non-hazardous landfill site in north Oxfordshire, which is also licensed to dispose of asbestos. The landfill site has permission to operate until 2019.

Appendix 3 – Receiving authorities’ planning policies on landfill

Waste Planning Authority	Plan and Status	Landfill policy
Surrey County Council	Surrey Waste Plan 2008 (Adopted)	<p>Surrey is required to provide landfill capacity for an apportionment (8.4%) of London’s waste that is exported to landfill in the South East, declining over time so that by 2015 only capacity for residual waste is required. Surrey County Council is committed to driving the management of waste up the hierarchy. It will not normally allow landfill or landraise sites in excess of need. The level of need required to be met will be continuously reviewed, and take into account the proposed decreasing level of provision required for waste from London.</p> <p><b>Policy WD7: Disposal by Landfilling, Landraising, Engineering or Other Operations.</b>                      Planning Permission will only be granted for waste disposal by landfilling, landraising or engineering or other operations provided:</p> <ul style="list-style-type: none"> <li>(i) the waste to be disposed of cannot practicably and reasonably be reused, recycled or processed (to recover materials; produce compost, soil conditioner, inert residues or to recover energy) or may otherwise be required for the restoration of mineral workings, and</li> <li>(ii) the proposed development is both essential for and involves the minimum quantity of waste necessary for:                             <ul style="list-style-type: none"> <li>a) the purposes of restoring current or former mineral workings sites; or</li> <li>b) facilitating a substantial improvement in the quality of land; or</li> <li>c) facilitating the establishment of an appropriate afteruse; or</li> <li>d) improving land damaged or disturbed as a result of previous or existing uses and where no other satisfactory means exists to secure the necessary improvement; or</li> <li>e) the engineering or other operations.</li> </ul> </li> <li>(iii) the proposed development does not prejudice the satisfactory restoration of mineral working sites in the locality, having regard to the supply and availability of appropriate waste materials.</li> </ul> <p>In granting planning permission for landfilling or landraising developments, or engineering or other operations, conditions may be imposed limiting both the types and quantities of waste to be deposited in order to conserve capacity for waste that cannot be reused, recycled or processed (to recover materials; produce compost, soil conditioner, inert residues; or to recover energy).</p>
Buckinghamshire County Council	Buckinghamshire Minerals and Waste Core Strategy (Adopted 2012)	<p>The Council will plan for a reduction in the disposal of waste to landfill – including that imported from London – over the plan period.</p> <p>The Council has identified that there will be sufficient landfill capacity available at 2026 and beyond to handle both Buckinghamshire’s own non-hazardous and inert materials (including planned imports from London) throughout the Plan period. Notwithstanding this conclusion the Council will monitor landfill use closely.</p> <p><b>Policy CS15 Landfill:</b>                      No additional landfill capacity for non-hazardous and inert waste will be provided within</p>

Waste Planning Authority	Plan and Status	Landfill policy
		<p>Buckinghamshire in the period to 2026. Where additional capacity results from planning consents for new mineral extraction sites with restoration, the presumption is the voidspace will be filled with inert material.</p> <p>The County Council's current policy is to plan for a declining amount of imported waste to be landfilled in Buckinghamshire (especially that arising within London and the South West).</p> <p><b>Policy CS16 Management of imported waste:</b>                      Provision of up to 2.30Mt capacity will be made within Buckinghamshire for the landfill of a declining amount of waste imported from London in the period to 2026. The County Council will resist proposals that seek to extend the life of existing consented landfill sites or to create new landfill sites where a significant proportion of the waste handled would originate outside Buckinghamshire. Proposals for facilities in Buckinghamshire primarily intended for management of imported wastes by any means other than landfill will also be resisted.</p>
Kent County Council	<p>Minerals and Waste Local Plan – strategy and policy directions consultation (May 2011)</p> <p><i>Adoption of Minerals and Waste Local Plan expected spring 2015</i></p> <p>Waste Site preferred options consultation 2012</p> <p><i>Adoption of Waste Sites Plan expected Sept 2015.</i></p>	<p><b>Minerals and Waste Local Plan – Strategy and Policy Directions consultation (May 2011)</b>                      Kent's inert landfill and recycling sites have no planning restriction on the origin of waste. Kent currently has over 26 million tonnes of consented and permitted inert landfill capacity and needs only 6.7 million tonnes for the entire plan period. Therefore, there is sufficient inert void space should CDE waste from London continue to be brought to Kent.</p> <p><i>Proposed Policy CSW3- Strategy for Waste Management Capacity</i>                      The strategy for waste management capacity in Kent is to provide sufficient waste management capacity to manage at least the equivalent of the waste arising in Kent plus a declining amount of waste from London. As a minimum it is to achieve the targets for recycling and composting, reuse and landfill diversion identified in the Kent Joint Municipal Waste Management Strategy and the Regional Spatial Strategy.</p> <p><i>Proposed Policy CSW10 Non Hazardous Waste Landfill</i>                      The strategy for non-hazardous waste landfill is only to grant planning permission for new sites or extensions to existing sites if:                      (a) it can be demonstrated that the waste stream that needs to be landfilled cannot be managed through alternative technologies which are higher in the waste hierarchy or disposed of at existing sites;                      (b) environmental benefits are to be secured by the development; and                      (c) the proposal does not cause unacceptable harm to any sensitive receptors.</p> <p><i>Proposed Policy CSW11 Inert Waste Landfill</i>                      Planning permission for the disposal of inert waste will be granted where:</p>

<b>Waste Planning Authority</b>	<b>Plan and Status</b>	<b>Landfill policy</b>
		<p>(a) it can be demonstrated that the waste cannot be managed in a more sustainable way;</p> <p>(b) it is for the restoration of a mineral working or despoiled land;</p> <p>(c) it can be demonstrated that the use of inert waste in the development will not have an adverse effect upon the timescale for the completion of restoration of existing mineral workings within the district or any adjoining district;</p> <p>(d) environmental benefits will result from the development;</p> <p>(e) that sufficient material is available to restore the site within agreed timescales; and</p> <p>(f) the proposal does not cause unacceptable harm to the environment or communities.</p> <p><b>Waste Sites Preferred Option Consultation (2012)</b></p> <p>The Revised Waste Needs Assessment report concludes that even when assuming that the level of imports from London were to continue for the whole of the plan period, there is sufficient permitted landfill for Kent's needs and at the end of the plan period, there would still be approximately 10 million tonnes of landfill void space remaining in Kent.</p> <p>Kent County Council has advised Lambeth that its emerging waste strategy is more than just maintaining self-sufficiency for Kent: it also seeks to make allowance to manage some imports. In the calculations to assess any future gaps in the provision of waste facilities, an allowance has been made for managing imported waste as follows:</p> <ul style="list-style-type: none"> <li>• 352,000 tonnes pa of CDE waste for landfill or recycling</li> <li>• 21,259 tonnes pa up to 2017 and 87,000 tonnes pa from 2018 of non-hazardous waste for either landfill or energy from waste</li> </ul> <p>This is set out in the following evidence base reports:</p> <ul style="list-style-type: none"> <li>○ Waste Needs Assessment: addendum to the Needs Assessment Modelling Technical Report 2011</li> <li>○ TRW8: Assessment of Need for Energy from Waste for Non-Hazardous Waste</li> </ul>
Essex County Council	<p>Waste development document – preferred approach 2011 (Waste Local Plan adoption expected Dec 2015)</p> <p>The Essex and Southend Waste Local Plan 2001</p>	<p><b>Information from Waste Development Document – preferred approach 2011:</b></p> <p>A major issue for Essex and Southend-on-Sea is the importation of waste from London. The Submitted RSS anticipates that by 2031 the level of imported waste from London will be reduced over time to 3% of the 2007 level of waste imported to the region. Policy WM3 in the Submitted RSS sets out the maximum quantities of municipal, commercial and industrial waste to be accepted by Essex and Southend-on-Sea from London (256,000 tonnes in 2010/11; 92,000 in 2020/21; 13,000 in 2030/31).</p>

Waste Planning Authority	Plan and Status	Landfill policy
		<p>The export of waste from London to surrounding areas is a long-standing issue. The availability of void space for landfill across the greater south east has substantially reduced as sites have been restored and are no longer available. Essex and Southend-on-Sea will continue to work with other Waste Planning Authorities in the East of England, the South East and the Greater London Authority to ensure that there is reduction in the volumes of residual waste exported from London, having regard to Adopted London Plan requirements with respect to exporting waste to Essex.</p> <p>There are distinct cross boundary movements of waste consisting both of wastes requiring pre-treatment and final disposal. In 2009 a total of 1,511 thousand tonnes (kt) was imported and 967 kt was exported, making Essex and Southend-on-Sea an overall net importer of waste (544kt in 2009). However, as described in the 2011 Capacity Gap Report, the principal source of imported waste in the Plan area continues to be from London.</p> <p>Despite the Submitted RSS policy and projections for a decreasing rate of London’s waste to be sent to landfill in Essex, the actual levels of waste imported from London for both pre-treatment and landfill are currently higher than that estimated in the Submitted RSS. Allowance for a portion of London’s waste still needs to be made in the WDD, therefore Essex and Southend-on-Sea have used the Submitted RSS projections for London imports when estimating the capacity gap for the WDD. However, the available voidspace in Essex (and other counties) is running out and there is a national move towards diverting waste away from landfill. In addition to imports from London, there continues to be movement of waste between Essex and Southend-on-Sea and neighbouring authorities. There is net exportation of waste to Thurrock, the East London Waste Authority (ELWA), Cambridgeshire and Peterborough, and Suffolk. However, there is net importation into the Plan area from the North London Waste Authority (NLWA), Hertfordshire, Kent and Medway and other (non-adjacent) UK authorities. Hence Essex and Southend-on-Sea will continue to plan for net self-sufficiency and to receive a proportion of residual waste from London disposal as agreed with authorities in the East of England.</p> <p><b>Current ADOPTED policy - The Essex and Southend Waste Local Plan 2001 Policy W3B:</b>  For the plan period (1997 – 2010) provision is made for landfill of a proportion of London’s waste in accordance with regional advice (currently Serplan SERP 160 and RPG9). Beyond 2005 provision will be made for a reduced amount of London’s waste. Beyond 2010 provision will only be made for some of London’s pre-treated waste residues, at a level to be determined in a review of this plan.</p>

<b>Waste Planning Authority</b>	<b>Plan and Status</b>	<b>Landfill policy</b>
Oxfordshire County Council	<p>Oxfordshire Minerals &amp; Waste Core Strategy Proposed Submission May 2013.</p> <p>Saved waste policies of the Oxfordshire Minerals and Waste Local Plan (1996), which forms part of the current development plan.</p>	<p><b>Oxfordshire Minerals and Waste Core Strategy Proposed Submission (May 2013):</b></p> <p><b>Waste planning objective</b> Recognise that waste will continue to be imported into Oxfordshire from London and elsewhere for disposal by landfill and seek to limit this to residual waste (following recycling and treatment elsewhere) and for the quantity of this waste to decrease over time as additional waste management facilities are provided closer to where the waste is produced.</p> <p><b>Policy W2 Import of non-hazardous waste</b> Provision will be made for disposal of a declining amount of residual non-hazardous waste from London and elsewhere outside Oxfordshire at existing landfill sites. New facilities which provide substantially for the treatment of residual non-hazardous waste from outside Oxfordshire will not be permitted unless there is no prospect of a site nearer to the source of waste being identified</p> <p><b>Policy W7 Landfill</b> Priority will be given to the use of inert (construction, demolition and excavation) waste which cannot be recycled as infill material at active or unrestored quarries where such material is required in order to achieve satisfactory restoration for appropriate afteruse. Permission will not be granted for disposal of inert waste elsewhere unless there would be overall environmental benefit.</p> <p>Permission will not be granted for new landfill sites for non-hazardous waste. Existing non-hazardous landfill capacity will be husbanded for the disposal of residual non-hazardous waste. Permission will be granted to extend the life of existing non-hazardous landfill sites where this is necessary to meet the need for disposal of residual non-hazardous waste or to enable completion and restoration of the landfill.</p> <p><b>Policy W8 Hazardous and radioactive waste</b> Permission will be granted for facilities for the management of hazardous waste where they are designed to meet a requirement for the management of waste produced in Oxfordshire. Facilities that also provide capacity for hazardous waste from a wider area should demonstrate that they will meet a need for waste management that is not adequately provided for elsewhere.</p> <p>OCC has advised Lambeth that quarry voids continue to be created to supply primary aggregates and the satisfactory restoration of these sites usually involves inert waste (principally excavation waste) being brought to a site. This is normally in short supply. The landfill policies (W2 and W7) in the Minerals and Waste Core Strategy Proposed Submission do not preclude movement of inert waste into Oxfordshire or attempt to set targets for the reduction in such movements.</p>

Waste Planning Authority	Plan and Status	Landfill policy
		<p><b>Saved waste policies of the Oxfordshire Minerals and Waste Local Plan (1996)</b></p> <p><b>W2</b> Provision will be made to accept waste from London and other parts of the South East for treatment and/or disposal within Oxfordshire, provided that the treatment or disposal is consistent with regional, Structure and local plan policies. Proposals for the treatment or disposal of waste from London requiring road transport for the principal component of its journey will not be permitted.</p> <p><b>W7</b> To control the release and location of landfill sites in such a way as to ensure that satisfactory restoration is progressively achieved with the least possible harm to the environment. Proposals will therefore be assessed against the following criteria:</p> <ul style="list-style-type: none"> <li>a) there is a definite need for the facilities which cannot be met by existing or permitted landfill sites;</li> <li>b) there should be no material damage or disturbance to the environment or to the amenities of residential and other sensitive uses or buildings, both during and after operation, by reason of noise, dust, vermin, smell, gas and other pollution, or long-term damage to the visual amenities;</li> <li>c) the proposed filling should not raise or impede the floodplain of rivers and streams or create risk of pollution of surface or underground water courses;</li> <li>d) the proposal will cause no material damage to any feature of importance within a Site of Special Scientific Interest or other site of nature conservation importance which cannot be protected by measures incorporated within the proposal;</li> <li>e) the proposal will cause no material damage to an ancient monument or archaeologically important area requiring permanent preservation;</li> <li>f) the proposal will not adversely affect an Area of Outstanding Natural Beauty or of High Landscape Value;</li> <li>g) in the case of proposals in the Green Belt the development should not injure the visual amenities of the Green Belt or conflict with its <i>Oxfordshire Minerals and Waste Local Plan Saved Policies – 25 September 2007</i> 4 purposes because of inappropriate siting, scale or design;</li> <li>h) the proposed access to the site, and transport routes for carrying waste to it, are suitable for the volume and nature of traffic which may be expected;</li> <li>i) the site and the methods of operation proposed are capable of progressive restoration and completion within an acceptable period having regard to the particular circumstances in each case;</li> <li>j) proposals for sites must meet with the hydrological and geological requirements for safe disposal of the particular waste concerned;</li> <li>k) where waste disposal might damage the visual amenities of an area during the period of operation, the site will be screened by earth mounding, tree planting or other techniques appropriate to the area.</li> </ul>

<b>Waste Planning Authority</b>	<b>Plan and Status</b>	<b>Landfill policy</b>
Derbyshire County Council	Waste Local Plan 2005  (currently preparing new Local Plan)	<p><b>Policy W11 Need for landfill</b> Waste disposal by means of landfill will not be permitted unless: the development is essential to satisfy a need to dispose of locally-generated waste which will not otherwise be met, taking into account the methodology set out in appendix B; and unless any material harm would be outweighed by one of the following:</p> <ul style="list-style-type: none"> <li>• the development is necessary to restore land for beneficial use in line with development plan policies;</li> <li>• the development is necessary to improve the land for agricultural use;</li> <li>• the development is necessary to achieve farm diversification consistent with the site's location;</li> <li>• the development is necessary to improve the local ecology or landscape.</li> </ul>
Wiltshire County Council	Wiltshire and Swindon Waste Development Control Policies DPD 2009  Wiltshire and Swindon Waste Core Strategy 2009	<p><b>**No specific mention of London and any importing of its waste by Wiltshire is made in these documents.**</b>  <b>Core Strategy objective includes:</b>            To ensure the best use will be made of the waste produced in Wiltshire and Swindon by driving waste up the management hierarchy. This is to be delivered by aiming to achieve waste elimination and reduction, maximising re-use, recycling and composting, and energy recovery, strictly in that order of priority, so as to actively promote a reduction in the amount of waste going to landfill. New innovative waste management techniques will be encouraged wherever possible.</p> <p><b>Development Control policy WDC13: LANDFILL DEVELOPMENTS</b>            Proposals for new or extended landfill developments will be permitted where the applicant can demonstrate where appropriate:            There is no suitable waste management option at a higher level in the waste hierarchy            The development would lead to a demonstrable improvement in the quality of the land            The proposal is essential for the restoration of the site            An extension to landfill operations is essential for operational reasons and is the only demonstrable option.</p>
Thurrock Council	Core Strategy and Policies for Management of Development, 2011	<p><b>Excerpt from Policy CSTP 29 Waste Strategy Landfill</b></p> <p>I. New non-hazardous or inert landfill capacity will only be considered where it can be demonstrated to contribute to the capacity requirements set out in the sub-text to this policy (as set out in Table 12 above) or the regional import approach set out in Policy CSTP30.</p> <p>II. Proposals for new landfilling will be resisted unless part of a necessary scheme to achieve approved restoration levels at a mineral working site. The Council will require satisfactory restoration in accordance with the aftercare and restoration policy within the MWDPD and seek appropriate after uses for waste management sites where they are not proposed to stay within a waste management use. Proposals for landraising above approved restoration levels will not be</p>

Waste Planning Authority	Plan and Status	Landfill policy
		<p>supported.</p> <p><b>Policy CSTP 30 Regional Waste Apportionment Strategic Approach to London's Imports</b></p> <p>I. Thurrock will only make provision for London's waste imports equivalent to the following cumulative tonnages across the Plan period (from 2009/2010) of 1,885,000 tonnes.</p> <p>II. Thurrock will not allocate or grant planning permission for new landfill capacity to accommodate London's waste arisings where the above capacity requirements have been met.</p> <p>III. Provision for new non-landfill waste facilities will only be made for waste not included within the above apportionment where a facility has a clear benefit to the region, such as the provision of specialist processing or treatment which would not be viable without a wider catchment and which would enable recovery of more locally generated wastes and contribute to meeting the capacity requirements set out in CSTP29.</p> <p>IV. Proposals for facilities to manage waste imported into Thurrock will be assessed primarily against the requirements of this policy, Policy CSTP29 and policies provided in the MWDPD.</p>
Medway Council	<p>Medway Submission draft Core Strategy February 2012 (<i>examination currently suspended</i>)</p>	<p>Waste policy does not specifically mention landfill or London but below is excerpt from <b>supporting text</b>:</p> <p>'Medway is still technically required to have regard for London's waste exports. However it is increasingly likely to be the case that any materials will be residues from higher order waste management processes. The quantities are unclear and the London authorities and commercial operators have expressed no interest in new landfill capacity.</p> <p>It is expected that the Government will clarify its position on this in due course but given the absence of any current demand in Medway it is not intended to make specific provision for London's waste.'</p>
Milton Keynes Council	<p>Waste DPD 2007 – 2026 Adopted 2008</p>	<p>London currently has limited capacity for waste processing and recovery (with recycling dominated by building industry capacity) and very little landfill capacity. The SE Plan assumes that London's exports to the region will decline over the period of the strategy and be limited to landfill waste and use of materials in landfill restoration that cannot be recycled or recovered within London, or residues of processing and treatment. Milton Keynes currently does not take any of London's waste. The draft SE Plan states that Milton Keynes should provide for landfill capacity for 10.1% (1 million tonnes in total between 2016-2025) of London's exported waste into the South East. The Council objected to the apportionment and this was considered at the Examination in Public to the SE Plan. Policy W3 of RPG9 requires all WPAs to collectively provide management capacity equivalent to the amount of waste arising and requiring management within the region's boundaries, plus a declining amount of waste from London. Therefore to meet the principles of self-</p>

<b>Waste Planning Authority</b>	<b>Plan and Status</b>	<b>Landfill policy</b>
		<p>sufficiency and ensure general conformity with both RPG9 and the emerging SE Plan, the Waste Development Plan Document will take into account the principle of making provision for London's waste. The Panel Report recommends a single apportionment and a revised apportionment of 10% for Milton Keynes to apply from 2006. There is no consideration of the amount of waste that equates to. The Panel Report is not a statement of Policy and changes to the Plan will be subject to further consultation. The Council maintains its objection to the level of apportionment proposed but is fully committed to working with SEERA and other bodies to quantify the waste arising from London to determine the impact on Milton Keynes.</p> <p><b>Policy WCS1 Capacity Requirements</b>                      ...This will include meeting regional targets for recycling and composting and managing non-hazardous landfill capacity for the disposal of residual waste to 2026. In addition capacity will be provided for waste from adjoining sub-regions and a declining amount of waste from London in line with the adopted Regional Spatial Strategy.</p>

Appendix 4 – Existing waste management facilities in Lambeth

Site	Operator	Type of waste management activity	Existing throughput (tonnes per annum)	Maximum licensed capacity (tonnes per annum)	Capacity figure for use in calculating total existing capacity*	Site area (hectares)	Comments
Lambeth Reuse & Recycling Centre, Vale Street SE27 9PA	Veolia on behalf of Lambeth Council	Reuse and recycling centre	2,076	12,953	9,715	0.12	EA licence number 83253. This site is part of a proposed site allocation in the Draft Local Plan 2012: retention of the RRC on the wider site is required.
8 Beadman Street SE27 0DN	Emmaus South Lambeth	Furniture reuse	100	n/a	100	0.06	No EA licence required.
Windsor Grove SE27 9NT	West Norwood Car Breakers	Scrap metal	832	n/a	832	0.26	Not currently licensed by the Environment Agency.
Arch 439, Wickwood Street/Gordon Grove SE5 9DW	Golden Motor Care Ltd	Scrap metal	120	Not known	120	0.10	EA licence number 102085
<b>TOTAL</b>			<b>3,052</b>	<b>12,953</b>	<b>10,767</b>	<b>0.54</b>	

\* Existing throughput or 75% of maximum licensed capacity, whichever is larger.

### Lambeth Reuse & Recycling Centre, Vale Street, Norwood SE27 9PA



**Site area:** 0.12 ha

**Ownership:** London Borough of Lambeth

**Ward:** Gipsy Hill

**Nature conservation:** The site does not have any nature conservation constraints.

**Historic environment and built heritage:** The site does not have any constraints in terms of historic environment or built heritage.

**Traffic and access:** There is access to the site from Vale Street which is an unclassified access road. Access to the site is along residential roads some of which are narrow. Should further intensification of the uses on this site occur then the transport impacts would need to be assessed dependent on the scale and nature of the facility and traffic generation. The site is not suitable for large vehicles (i.e. vehicles that are larger than a refuse vehicle).

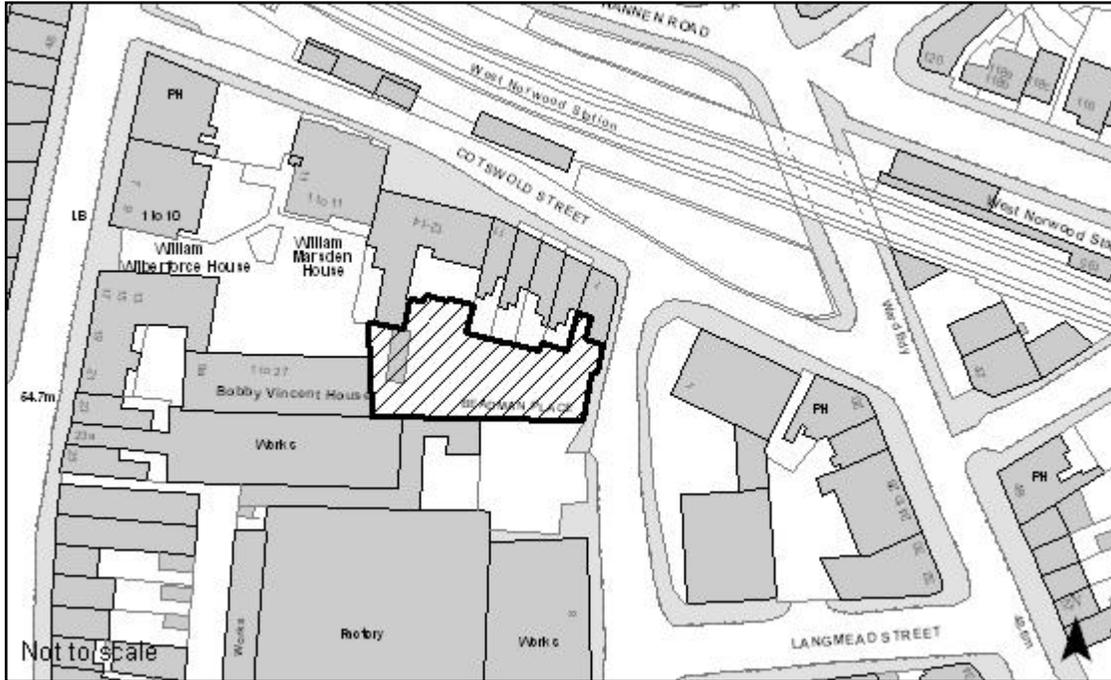
**Potential land use conflict:** The site is currently in waste management use and therefore there are no immediate land use policy conflicts. There are residential properties within the vicinity of the site and directly adjacent to the southern boundary and this would need to continue to be managed to ensure that the current use can remain without adverse impacts on the surrounding area. Any potential intensification of the waste management use would need to be assessed in line with the requirements of emerging Local Plan policy EN7.

**Potential waste management capacity:** The existing throughput of the facility is 2,076 tonnes per annum. The maximum licensed capacity is 12,953 tonnes per annum and the capacity figure for calculating total capacity is 9,715 tonnes per annum.

**Deliverability:** The site is part of proposed Site 3 in the Draft Lambeth Local Plan 2013. This site allocation relates to the wider Vale Street Depot site. The site as a whole has

potential for educational or housing use. Retention of the reuse and cycling centre on the site is a requirement, although there may be scope to reconfigure it as part of a wider redevelopment scheme.

### 9 Beadman Street, West Norwood SE27 0DN



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**Site area:** 0.06 ha

**Ownership:** Emmaus South Lambeth Community

**Ward:** Knights Hill

**Existing use(s):** The Emmaus South Lambeth facility is used for furniture reconditioning and re-use.

**Nature conservation:** The site and its surrounds do not have any nature conservation constraints.

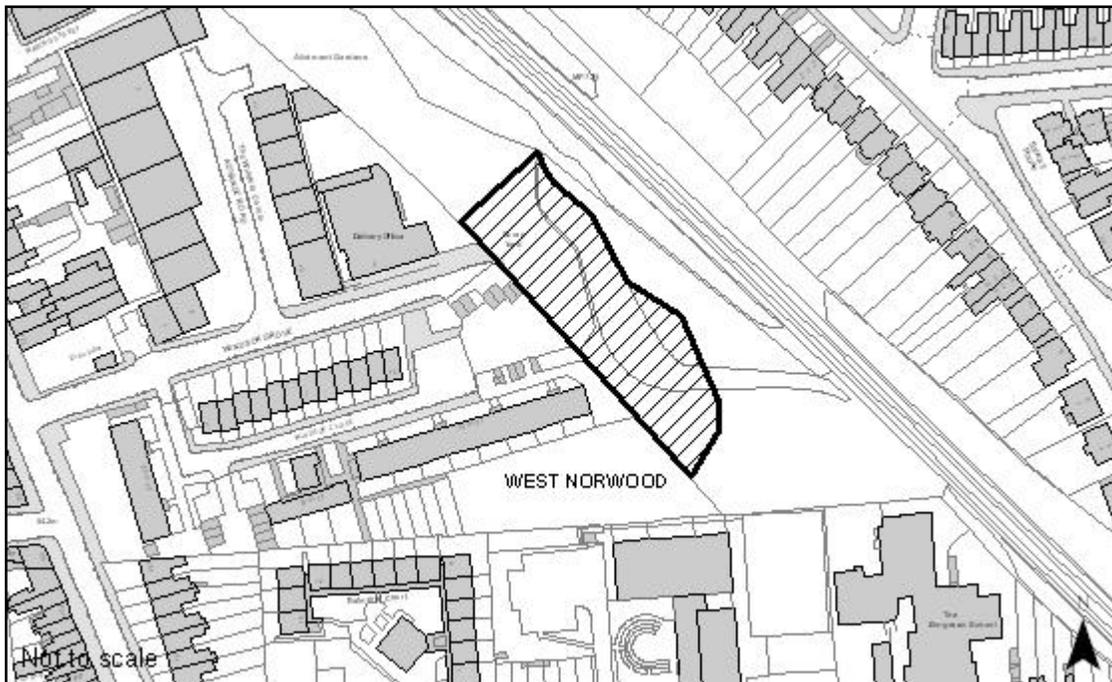
**Historic environment and built heritage:** The site and its surrounds are not situated within any designated Conservation Areas, nor are there any listed buildings within the vicinity of the site.

**Traffic and access:** The site is located within a KIBA and has access to and from Beadman Street onto Ernest Avenue. Ernest Avenue connects to Knight's Hill to the north and Norwood High Street to the south, both of which form part of the Transport for London road network. Parking is available on Beadman Street and tracking of vehicles would be required should any proposal for redevelopment come forward. The site is suitable in principle for large vehicles.

**Potential land use conflict:** The site is in a KIBA which is an acceptable location for waste management uses. The surrounding area is predominately commercial; there are however, residential properties along the northern boundary of the site and any intensification of uses would need to consider potential impacts on the surrounding area.

**Deliverability:** Emmaus South Lambeth provide a collection service to the residents of Lambeth from this site; this started in May 2012. This service is linked to the London Re-use Network Central Cluster, which has recently been given substantial investment by the London Waste and Recycling Board, through London Re-use Ltd (LRL). This is consistent with the aims of Lambeth’s Municipal Waste Management Strategy. There is therefore no immediate prospect of the waste management use ceasing on this site; the tonnage processed through the site is likely to increase.

### Scrap yard, Windsor Grove, West Norwood SE27 9NT



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**Site area:** 0.26 ha

**Ownership:** Network Rail

**Ward:** Gipsy Hill

**Existing use(s):** The site is currently in waste management use as a scrap metal yard operated by West Norwood Car Breakers. The site is currently unlicensed according to Environment Agency records. The Environment Agency is in the process of contacting the operator to advise them that they will be required to apply for a licence.

**Nature conservation:** The site is located adjacent to a Site of Borough Nature Conservation Importance which also encompasses the areas which are adjacent to the railway line to the north, south and east of the site. It is unlikely proposals on this site would adversely affect

the nature conservation value of the adjoining land. Proposals would need to be limited to within the boundary identified to ensure this.

**Historic environment and built heritage:** The site and its surrounds are not situated within any designated Conservation Areas, nor are there any listed buildings within the vicinity of the site.

**Traffic and access:** The site has access from Windsor Grove to Norwood High Street which is a local distributor road. Should further intensification of the use on this site occur then the transport impacts would need to be assessed dependent on the scale and nature of the facility and traffic generation. There is poor geometry at the junction of Norwood High Street and Windsor Grove and therefore larger vehicles are unlikely to be able to access this site as access as it is only left in, left out.

**Deliverability:** The waste management use on the site is currently operated by West Norwood Car Breakers and the council is not aware of any plans to close the facility. Should the existing use cease Core Strategy Policy S8(c) and emerging Lambeth Local Plan policy EN7 safeguard existing waste transfer and management sites for waste management use, unless appropriate compensatory provision is made in appropriate locations elsewhere in the borough. The potential for intensification of the use is not known and would have to be considered at the time of any proposed development.

#### **Arch 439, Gordon Grove/Wickwood Street, Loughborough Junction, SE5 9DW**



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**Site area:** 0.1 ha

**Ownership:** London Borough of Lambeth

**Ward:** Coldharbour

**Site Description:** The site is located within an industrial area which runs along the railway line and which includes a number of railway arches. The surrounding area is mixed with open space/adventure playground to the north and residential to the west.

**Existing use(s):** The site is currently in waste management use as a scrap metal yard operated by Golden Motor Care Ltd.

**Nature conservation:** The site and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The site and its surrounds are not situated within any designated Conservation Areas, nor are there any listed buildings within the vicinity of the site.

**Traffic and access:** The site has dual access from Rathgar Road, which connects to Loughborough Road, and Wickwood Street. Loughborough Road connects onto Coldharbour Lane which is a local distributor road. Access to the site is restricted by width and also by height due to the railway line. Should further intensification of the uses on this site occur then the transport impacts would need to be assessed dependent on scale and nature of the facility and traffic generation.

**Potential land use conflict:** The site is currently in waste management use and located within a KIBA which supports uses such as waste management. There would not therefore be any direct land use conflicts. There are residential properties situated along the eastern boundary of the site and an adventure playground to the north. The remainder to uses in the vicinity of the site are employment.

**Deliverability:** The council is not aware of any plans to close the facility. Should the existing use cease Core Strategy Policy S8(c) and emerging Lambeth Local Plan policy EN7 safeguard existing waste transfer and management sites for waste management use, unless appropriate compensatory provision is made in appropriate locations elsewhere in the borough.

Appendix 5 – Sites currently in waste transfer use in Lambeth

Site	Operator	Type of waste transfer activity	Current throughput (tonnes per annum)	Maximum licensed waste transfer capacity (tonnes per annum)	Site area in waste transfer use (hectares)	Estimated waste management capacity (tonnes per annum)*	Comments
Shakespeare Wharf, Shakespeare Road SE24 0JZ	SITA Waste Handling Ltd	Commercial & industrial	20,000	87,750	0.67	53,600	EA licence number 83343.
4-16 and 1-3 Belinda Road SE5 7DT	Powerday Plc	Commercial & industrial	19,000	46,000	0.12	9,600	EA licence number 83255.
26 Wanless Road SE24 0HW	London Borough of Lambeth	Public health and pest control	Not known	1,005	0.11	8,800	Premises occupied by LB Lambeth Environmental Protection service. EA licence number 83254.
44 Clapham Common Southside SW4 9BU	Cannon Hygiene Ltd	Clinical waste	Not known	4,999	0.11	8,800	Cannon Hygiene occupy one unit on a larger site operated by OCS. EA licence number 83249.
<b>TOTAL</b>			<b>39,000</b>	<b>139,754</b>	<b>1.01</b>	<b>80,800</b>	

\*calculated at 80,000 tonnes per hectare.

## Shakespeare Wharf, Shakespeare Road, Herne Hill SE24 0JZ



**Site area:** 0.67 ha

**Ownership:** SITA UK

**Ward:** Herne Hill

**Site Description:** The site fronts onto Shakespeare Road to the north west and is bounded by railway lines to the east and south. There is a housing development immediately to the north of the site and a row of terraced houses (across Shakespeare Road) to the north-west.

**Existing use(s):** The site is currently in waste transfer use dealing with commercial and industrial waste and is operated by SITA Waste Handling Ltd.

**Reason for identification:** The site is identified in the Lambeth Unitary Development Plan 2007 as currently being in waste management use although it is in fact in waste transfer use. The site is listed in Annex 6 (Designated Waste Sites) of the Core Strategy and included on the Core Strategy Proposals Map.

**Nature conservation:** The site and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The site and its surrounds are not situated within any designated Conservation Areas, nor are there any listed buildings within the vicinity of the site.

**Traffic and access:** The site has access onto Shakespeare Road which connects onto Coldharbour Lane to the north, which is a London distributor road, and Railton Road to the south, which is a local distributor road. Should further intensification of the uses on this site

occur then the transport impacts would need to be assessed dependent on the scale and nature of the facility and traffic generation. In particular, consideration may need to be given to restricting traffic movement as there is a school nearby and on-street parking on Shakespeare Road.

**Potential land use conflict:** The site is currently in waste transfer use and therefore would not have any direct on site land use conflicts. There are residential properties within the vicinity of the site and directly to the south of the site and any impacts on uses would need to be considered and managed where necessary.

**Potential waste management capacity:** The current throughput of the facility is 20,000 tonnes per annum and the maximum licensed capacity is 87,750 tonnes per annum. The estimated waste management capacity of the site based on a ratio of 80,000 tonnes per hectare would be 53,600 tonnes per annum.

**Deliverability:** The waste transfer use on the site is currently operated by SITA. The council has met with SITA to discuss their future plans for the site. At present the site is considered to be in a strategically important location for the operations. However, it is not significant in size and may become surplus to their operations in the future. SITA has also advised that the location in terms of its proximity to residential properties restricts the potential for future intensification and also reduces the capabilities for provides various types of waste technologies on the site.

SITA have advised that at present there are no plans to relocate the operations on this site elsewhere; however they suggested that flexibility would be preferred moving forward. Should the existing use cease Core Strategy Policy S8(c) and emerging Lambeth Local Plan policy EN7 safeguard existing waste transfer and management sites for waste management use, unless appropriate compensatory provision is made in appropriate locations elsewhere in the borough.

**Distribution of waste sites across the borough and potential for co-locating with other waste facilities:** The site is located in the east of the borough.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present in this vicinity.

**Conclusions:** The site is presently in waste transfer use and is safeguarded by Core Strategy Policy S8(c) and emerging Lambeth Local Plan policy EN7. This site is therefore a preferred location for waste management use.

**Recommendation:** Continue to safeguard this site for waste use.

#### 4-16 Belinda Road, Loughborough Junction SE5 7DT



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**Site area:** 0.12 ha

**Ownership:** Briarpath Properties Limited

**Ward:** Coldharbour

**Site Description:** The site is located on the southern side of Belinda Road and a railway line runs directly adjacent to it along the southern boundary. The surrounding area is largely industrial/commercial in nature. The Loughborough Junction Local Centre abuts the site to the east.

**Existing use(s):** The site is currently in waste transfer use dealing with commercial and industrial waste and is operated by Powerday Plc.

**Reason for identification:** The site is listed in Annex 6 (Designated Waste Sites) of the Core Strategy and included on the Proposals Map (January 2011).

**Nature conservation:** The site and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The site and its surrounds are not situated within any designated Conservation Areas, nor are there any listed buildings within the vicinity of the site.

**Traffic and access:** The site has direct access from Belinda Road onto Coldharbour Lane which is a London distributor road. Should further intensification of the uses on this site occur then the transport impacts would need to be assessed dependent on scale and nature of the facility and traffic generation. The site has poor visibility and access to Coldharbour

Lane and vehicle tracking of the junction would be required. The site would not be suitable for large number of vehicle movements.

**Potential land use conflict:** The site is currently in waste transfer use and located between two railway lines and wider surrounding area is largely industrial. The site is not located within a KIBA.

**Potential waste management capacity:** The current throughput of the facility is 19,000 tonnes per annum and the maximum licensed capacity is 46,000 tonnes per annum. The estimated waste management capacity of the site based on a ratio of 80,000 tonnes per hectare would be 9,600 tonnes per annum.

**Deliverability:** The waste transfer use on the site is currently operated by Powerday. The council has met with Powerday to discuss their future plans for the site. At present the site is considered to be an important location for Powerday's operations; however they have acknowledged that the site is constrained in terms of access and in the future will be looking to improve the access arrangements and possibly expand into adjoining land. Assuming that Powerday are able to secure access improvements for this site, then it is envisaged that it will eventually come into waste management use.

**Distribution of waste sites across the borough and potential for co-locating with other waste facilities:** The site is located in the east of the borough. There are other waste sites located within the Loughborough Junction area including Railway Arch 439 Gordon Grove/ Wickwood Street and 26 Wanless Road.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** The site is presently in waste transfer use and is safeguarded by Core Strategy Policy S8(c) and emerging Lambeth Local Plan policy EN7. This site is therefore a preferred location for waste management use.

**Recommendation:** Continue to safeguard this site for waste use.

## 26 Wanless Road, Herne Hill SE24 0HW



**Site area:** 0.11 ha

**Ownership:** London Borough of Lambeth

**Ward:** Herne Hill

**Site Description:** The site is located on the south eastern side of Wanless Road. To the rear are a number of residential properties fronting onto Herne Hill Road. To the north of the site is a railway line and to the north west (across Wanless Road) are a number residential properties which front onto Wanless Road and Herne Hill Road.

**Existing use(s):** The council has a licence for waste transfer use dealing with public health and pest control waste. The site is actively used for this purpose.

**Reason for identification:** The site is licensed for waste transfer use, for the transfer of pest control waste. The site is listed in Annex 6 (Designated Waste Sites) of the Core Strategy and included on the Proposals Map (January 2011).

**Nature conservation:** The site and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The site and its surrounds are not situated within any designated Conservation Areas, nor are there any listed buildings within the vicinity of the site.

**Traffic and access:** Wanless Road connects to Herne Hill Road which is a local distributor road. The site has poor access for large lorries. Should further intensification of the uses on this site occur then the transport impacts would need to be assessed dependent on the scale and nature of the facility and traffic generation.

**Potential land use conflict:** The surrounding area is mixed with industrial uses as well as residential properties. The site does not present any direct land use conflicts. The site is not located within a KIBA.

**Potential waste management capacity:** The maximum licensed capacity is 1,005 tonnes per annum. The estimated waste management capacity of the site based on a ratio of 80,000 tonnes per hectare would be 12,000 tonnes per annum.

**Deliverability:** Core Strategy Policy S8(c) and emerging Lambeth Local Plan policy EN7 safeguard existing waste transfer sites, unless appropriate compensatory provision is made in appropriate locations elsewhere in the borough. The site is owned by the council, which is currently assessing the future of all sites in its ownership. If change of use were to be considered, the waste management capacity of the site would have to be re-provided in an appropriate location elsewhere in the borough in accordance with adopted policy.

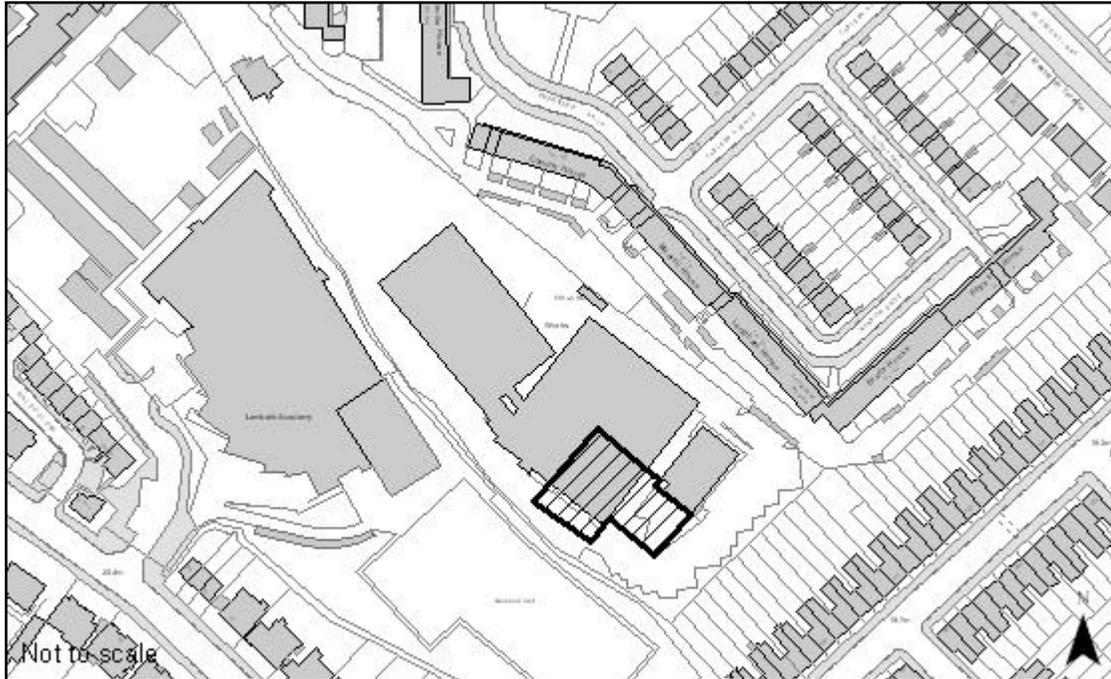
**Distribution of waste sites across the borough and potential for co-locating with other waste facilities:** The site is located in the east of the borough. There are other waste sites within the Loughborough Junction area including Railway Arch 439 Gordon Grove/Wickwood Street and 4-16 Belinda Road.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present in the vicinity.

**Conclusions:** The site is presently in waste transfer use and is safeguarded by Core Strategy Policy S8(c) and emerging Lambeth Local Plan policy EN7. This site is therefore a preferred location for waste management use.

**Recommendation:** Continue to safeguard this site for waste use.

**Part of 44 Clapham Common Southside (area in waste transfer use), Clapham SW4 9BU**



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**Site area:** 0.11 ha

**Ownership:** OCS Group Limited

**Ward:** Clapham Common

**Site Description:** The site is part of a large business complex owned by the OCS Group that is situated off Clapham Common South Side. Only a small part of this site is used for waste transfer and this use is ancillary to OCS's main operations. The surrounding area is mixed with commercial, educational and residential uses. The site adjoins Lambeth Academy to the south west, Lambeth College to the north west and the Notre Dame Estate to the north. To the south east of the site are a number of residential properties which front onto Abbeville Road.

**Existing use(s):** A small part of the site is currently in waste transfer use dealing with clinical waste, operated by Cannon Hygiene Ltd. This use is ancillary to OCS's facilities management operation.

**Reason for identification:** The site is listed in Annex 6 (Designated Waste Sites) of the Core Strategy and included on the Proposals Map (January 2011).

**Nature conservation:** The site and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The site is not situated within a designated Conservation Area. The north western boundary of the wider site (across Clapham Common Southside) is Clapham Common, which is Metropolitan Open Land and located within the

Clapham Conservation Area (CA1). None of the buildings on site or adjacent to it are listed buildings. The site falls within an Archaeological Priority Area.

**Traffic and access:** The site has direct access to Clapham Common Southside which forms part of the Transport for London Road Network. Access is not available for a large number of vehicle movements or larger vehicles due to the nature of the access onto Clapham Common South Side. Should further intensification of the use on this site occur then the transport impacts would need to be assessed dependent on the scale and nature of the facility and traffic generation.

**Potential land use conflict:** The site is situated within a wider employment site and does not currently have any direct on site land use conflicts. If the use were to be intensified or more of the OCS site were proposed for waste management use, then the impacts on neighbouring uses would have to be assessed.

**Potential waste management capacity:** The current maximum licensed capacity is 4,999 tonnes per annum. The estimated waste management capacity of the site based on a ratio of 80,000 tonnes per hectare would be 8,800 tonnes per annum.

**Deliverability:** The waste transfer use on the site is currently operated by Cannon Hygiene and is ancillary to the main business use. Should the existing use cease then Core Strategy Policy S8(c) and emerging Lambeth Local Plan policy EN7 safeguard existing waste transfer and management sites for waste management use, unless appropriate compensatory provision is made in appropriate locations elsewhere in the borough. The council has met with an agent for OCS and they have advised that OCS is exploring a possible relocation from the site. There are no plans to consolidate or intensify the existing waste transfer facility.

**Distribution of waste sites across the borough and potential for co-locating with other waste facilities:** The site is located in the east of the borough.

**Decentralised Energy – access to future CHP/CCHP:** There may be scope in the future to connect to district heating system in Clapham. The London Heat Map Study (June 2010) identifies that there is potential for a larger network of district heating to be developed and the connection between the two approved development sites, Mary Seacole House and Clapham Leisure Centre which include CHP units, to be combined to form a more efficient system.

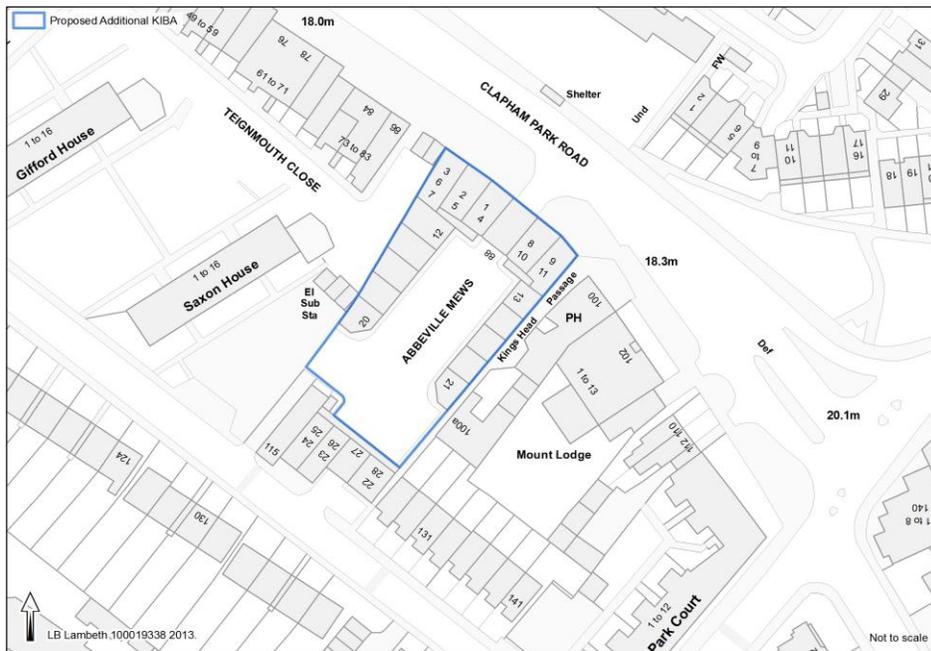
**Conclusions:** The site is presently in waste transfer use and is safeguarded by Core Strategy Policy S8(c) and emerging Lambeth Local Plan policy EN7. This site is therefore a preferred location for waste management use.

**Recommendation:** Continue to safeguard this site for waste use.

## Appendix 6 – Assessment of Key Industrial and Business Areas for waste management use

Note: The site areas in this appendix relate to the revised KIBA boundaries as proposed in the Draft Lambeth Local Plan 2013.

### KIBA 1: Abbeville Mews (Proposed)



**Site area:** 0.19ha

**Ownership:** Private (not known)

**Ward:** Clapham Common

**Site Description:** The site is an enclosed courtyard with access from

**Existing use(s):** Managed business centre mainly comprises small B1 units.

**Nature conservation:** The proposed KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The proposed KIBA is not located within a Conservation Area and there are no adjacent listed buildings.

**Traffic and access:** Access to the site is from Clapham Park Road, a London Distributor Road. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant transport impacts. There is limited parking and servicing available on the site.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs and therefore there are no immediate land use conflicts in principle. Abbeville Mews is a small managed business centre which offers space in particular for small and start-up enterprises. This type of premises is important and beneficial for local businesses in the borough and helps meet the demand for workspace by SMEs. The types of waste management use that could locate in this type of property are likely to be limited.

**Potential waste management capacity:** The make up of the building, with a series of smaller business units, means that the scale of any waste management use in one or

several of the units is unlikely to contribute significantly to the borough's waste apportionment.

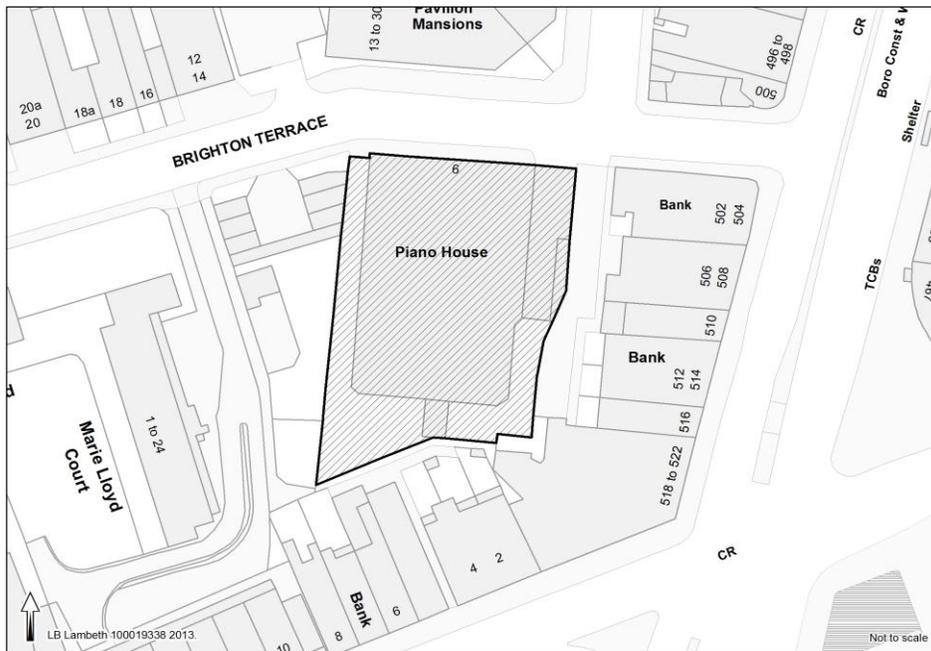
**Deliverability:** The site is a small managed business centre with limited outside space and limited on site parking. It is made up of a series of mostly B1 starter business units, some of which are very small. It is therefore unlikely to come forward within the plan period with any significant waste management uses.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** This KIBA contains a small managed business centres and is unlikely to accommodate waste management uses of a scale which would significantly contribute to the borough's waste apportionment.

**Recommendation:** This KIBA is not considered to be one of the most appropriate locations for waste management uses.

## KIBA 2: Brighton House (Piano House)



**Site area:** 0.17 ha

**Ownership:** LCN (Brixton) Ltd

**Ward:** Ferndale

**Site Description:** The site is located on the western side of Brixton Road and located just outside the Brixton major town centre boundary. The surrounding area predominately comprises town centre uses with some residential uses.

**Existing use(s):** Managed business centre mainly comprises small B1 units.

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The building is locally listed and within the Brixton Conservation Area (CA 26).

**Traffic and access:** Vehicle access to the KIBA is from Brighton Terrace which connects to Brixton Road (A23) which forms part of the Transport for London Road Network. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant transport impacts. There is limited parking and servicing available on the site.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs and therefore there are no immediate land use conflicts in principle. The Piano House comprises a small managed business centre which offers space in particular for small and medium enterprises. These types of premises are important and beneficial for local businesses in the borough and positively help meet the demand for workspace by SMEs. The types of waste management use that could locate in this type of property are likely to be limited.

**Potential waste management capacity:** The make up of the building, with a series of smaller business units, means that the scale of any waste management use in one or several of the units is unlikely to contribute significantly to the borough's waste apportionment.

**Deliverability:** The site is a small managed business centre with no outside space and limited on site parking. It is made up of a series of mostly B1 starter business units, some of which are very small. It is therefore unlikely to come forward within the plan period with any significant waste management uses.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present. Brixton has been identified as a low carbon zone in the Future Brixton master plan. The London Heat Study (June 2010) also states that in Brixton the 16 hectares of land under council ownership should be prioritised for potential network connections.

**Conclusions:** This KIBA contains a small managed business centres and is unlikely to accommodate waste management uses of a scale which would significantly contribute to the borough's waste apportionment.

**Recommendation:** This KIBA is not considered to be one of the most appropriate locations for waste management uses.

### KIBA 3: Camberwell Trading Estate and adjoining sites



**Site area:** 2.78 ha

**Ownership:** Mixed

**Ward:** Vassall

**Site Description:** The KIBA is located in the east of the borough and runs parallel to the railway line that runs between Loughborough Junction and Camberwell. The area is bounded by Paulet Road to the west and Carew Street to the east. The KIBA comprises a number of business centres and industrial/warehouse estates including Lilford Road Business Centre, Chartwell Business Centre and Camberwell Trading Estate. The KIBA therefore contains a mixture of offices and workspace business units as well as industrial warehouse units of various sizes. There are a number of residential properties situated to the west of the KIBA which front onto Paulet Road.

**Existing use(s):** Various business and industrial uses.

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The KIBA is not within a Conservation Area and there are no listed buildings within the vicinity of the site. The Minet Estate Conservation Area adjoins part of the KIBA boundary along Paulet Road and Lilford Road.

**Traffic and access:** Vehicle access to the KIBA is from Lilford Road, Paulet Road and Denmark Road. Both Lilford Road and Denmark Road connect to Coldharbour Lane (A2217) and Brixton Road (A23) which forms part of the Transport for London road network. Access to the KIBA is along residential roads some of which are narrow. The KIBA is not suitable for large vehicles (i.e. vehicles that are larger than a refuse vehicle). Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant

transport impacts. There is potential for on site parking and servicing.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs and therefore there are no immediate land use conflicts. There are residential properties located along the western boundary of the site. A buffer between any waste management uses and residential properties may need to be considered depending on the facility/operations proposed.

**Potential waste management capacity:** The KIBA contains a mixture of accommodation with a number of railway arches, managed business centres and large industrial units. The make up of the industrial estate means that waste management uses in one or several of the units could potentially be accommodated and make a positive contribution to the borough's waste apportionment.

**Deliverability:** The KIBA contains some sites and premises which could potentially be taken up by a waste management use. However, there are no known plans for new waste management uses in this location at present.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** The area contains a number of industrial and warehouse units within three main business/industrial centres which could in principle facilitate various smaller scale waste management operations.

**Recommendation:** This KIBA is considered to be one of the most appropriate locations for new waste management uses.

#### KIBA 4: Clapham North Industrial Estate



**Site area:** 3.06 ha

**Ownership:** Mixed

**Ward:** Larkhall

**Site Description:** The KIBA is located in the east of the borough. It is to the western side of Clapham Road and also has a frontage onto Union Road and Jeffery's Road. The site comprises a number of business uses including Union Court Business Centre which is well managed and contains a number of small and medium sized businesses and a car sales dealership. To the east of the site, on the opposite side of Clapham Road and directly adjoining the site to the north, are a number of residential properties. To the south of the site (across Union Road) are a number of commercial premises with residential above and a recently constructed mixed use development.

**Existing use(s):** Various business, industrial and sui generis uses.

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The site and its surrounds are not situated within a Conservation Area and there are no listed buildings in the vicinity of the site.

**Traffic and access:** The KIBA has access onto Clapham Road which forms part of the Transport for London Road Network. Access is also available from Union Road and Jeffery's Road. There is however poor junction geometry at Clapham Road/Union Road junction and access close to Union Road junction is unlikely to be acceptable for safety reasons. Similarly, access to the site from Jeffery's Road would not be suitable. Any significant traffic generation is unlikely to be acceptable in terms of impact from Clapham Road. There is potential for on site parking on some sites.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs and therefore there are no immediate land use conflicts in principle. Part of this KIBA is proposed for de-designation through the Draft Lambeth Local Plan 2013, in order to remove residential uses granted permission prior to the adoption of the Core Strategy 2011

**Potential waste management capacity:** The remaining KIBA contains a mixture of unit sizes and types including offices and smaller industrial units. The make up of the means that the scale of any waste management use in one or several of the units/sites is unlikely to contribute significantly to the borough's waste apportionment.

**Deliverability:** The majority of the premises within the remaining KIBA are presently occupied including the car sales dealership and small managed business centres. There is potential for smaller scale waste management uses to locate on these within the remaining KIBA but there are no known proposals at present.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** The remaining KIBA predominately consists of small managed business units and it is unlikely these would significantly contribute to the borough's waste apportionment.

**Recommendation:** This KIBA is not considered to be one of the most appropriate locations for waste management uses.

## KIBA 5: Clapham Park Hill



**Site area:** 0.40 ha

**Ownership:** Mixed

**Ward:** Clapham Common

**Site Description:** The KIBA is located on the southern side of Clapham Park Road. The surrounding area is predominately residential with some active frontage uses located along the Clapham Park Road frontage. The part of the KIBA that has experienced recent mixed use development including residential uses is proposed for de-designation through the Draft Lambeth Local Plan 2013.

**Existing use(s):** Mixed use with office and business uses.

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The Clapham Park and Northbourne Road Conservation Area (CA 17) adjoins the KIBA.

**Traffic and access:** Clapham Road forms part of the Transport for London Road Network. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant transport impacts.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs and therefore there are no immediate land use conflicts. There are residential properties located close to the boundary of the site. A buffer between any waste management uses and residential properties may need to be considered depending on the facility/operations proposed.

**Potential waste management capacity:** The make up of the KIBA means that the scale of any waste management use in one or several of the units/sites is unlikely to contribute significantly to the borough's waste apportionment.

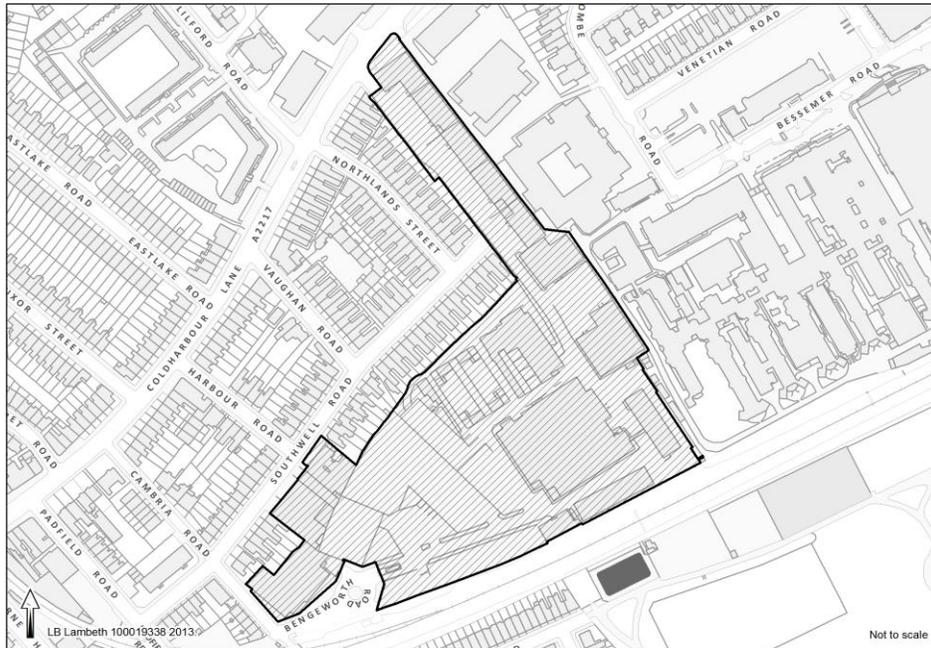
**Deliverability:** There is potential for smaller scale waste management uses to locate on these within the remaining KIBA but the likelihood of this happening during the plan period is not known.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** The remaining KIBA predominately consists of small managed business units and it is unlikely these would significantly contribute to the borough's waste apportionment.

**Recommendation:** This KIBA is not considered to be one of the most appropriate locations for waste management uses.

## KIBA 6: Coldharbour Lane Industrial Estate and Bengeworth Road Depot



**Site area:** 3.61 ha

**Ownership:** Mixed including EDF Energy and Kings College Hospital

**Ward:** Herne Hill

**Site Description:** This KIBA is in two main parts. The first is Coldharbour Industrial Estate which comprises various warehouse/industrial units accessed directly from Coldharbour Lane. Coldharbour Lane Industrial Estate is a linear estate and a number of King's College Hospital buildings adjoin the estate to the east. The second part of the KIBA is the Bengeworth Road Depot which is currently in use by EDF Energy and comprises various office buildings, substations and a large car parking area. To the south of the site is a railway line and there are also a number of smaller warehouse and office units which front onto Southwell Road.

**Existing use(s):** Operational utility run by EDF Energy and various business and commercial uses including those associated with King's College Hospital.

**Nature conservation:** The site and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The site is not situated within a designated Conservation Area. There are two listed buildings at No's 56 and 58 Southwell Road which adjoin the site.

**Traffic and access:** Vehicular access to the KIBA is available directly from Coldharbour Lane (A2217). Further access to Bengeworth Road Depot is also available from Cambria Road which connects onto Coldharbour Lane. Access to the site from Cambria Road is poor and not particularly suitable for large lorries. The properties fronting onto Southwell Road have vehicular access from this local road only. Detailed assessments of transport impacts

would be required once the type of waste management facility was known. There is potential for on site parking and servicing.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs in principle and therefore there are no immediate land use conflicts. Some of the northern boundary of the site adjoins residential properties however the remainder of the site adjoins an industrial estate or the railway line which limits any potential conflicts. A buffer between any waste management uses and residential properties may need to be considered depending on the facility/operations proposed.

**Potential waste management capacity:** The KIBA contains a mixture of commercial accommodation and the make up of the industrial estate means that waste management uses in one or several of the units or sites could be accommodated. Part of the Bengeworth Road Depot is understood to be surplus to EDF's requirements and waste management uses could be accommodated on this part of the KIBA or as part of any redevelopment. This opportunity means suggests that sites and/or units in this KIBA could positively contribute to the borough's waste apportionment. There may be scope for new waste management facilities associated with King's College Hospital.

**Deliverability:** The KIBA contains some sites and premises which could potentially be taken up by a waste management use, although there are no known plans at present.

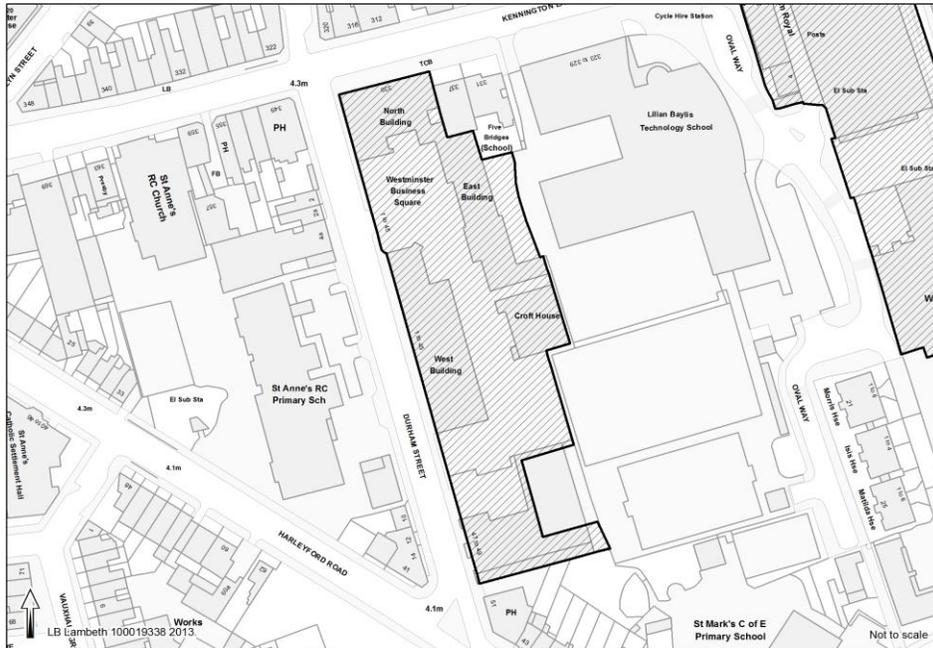
**Decentralised Energy – access to future CHP/CCHP:** Kings College Hospital has proposals for CHP to be installed on the hospital site. This is identified in the King's College Masterplan and the London Heat Map Study (June 2010).

**Conclusions:** The area contains a number of industrial and warehouse units which could facilitate various smaller scale waste management operations. Part of the EDF Energy site may also become available in the future as part of the land will be surplus to EDF Energy's requirements, so development for or which includes waste management uses may be an option.

The area contains an energy operator in EDF energy and also adjoins King's College Hospital which has plans to install a CHP facility. The northern part of the site adjoins a railway line. As the site is located close to Kings College Hospital which deals with clinical waste, any future waste management facility could be suitably located to support the waste management needs associated with King's College Hospital.

**Recommendation:** This KIBA is considered to be one of the most appropriate locations for new waste management uses.

## KIBA 7: Durham Street/Oval Way (Westminster Business Square)



**Site area:** 0.64 ha

**Ownership:** Mixed including Workspace Group Ltd

**Ward:** Oval

**Site Description:** The KIBA is situated to the east of Vauxhall Station and is bounded by Kennington Lane to the north and Durham Street to the west. The surrounding area is of mixed character in terms of architectural style, form, size and uses. To the immediate east of the site is the recently developed Lillian Baylis School, which contains a number of contemporary buildings orientated towards Kennington Lane with playing fields to the rear. There are also two residential buildings sited on Kennington Lane between the subject site and Lillian Baylis School.

**Existing use(s):** Business centre with various types of unit including affordable start up business space. The centre is managed by Workspace Group.

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** Part of the KIBA is located within Vauxhall Conservation Area (CA32). The adjoining property at No. 337 Kennington Lane in Grade II Listed Building.

**Traffic and access:** The KIBA has access onto Durham Street which forms part of the Transport for London Road Network. The site is located on the boundary of the Congestion Charge Zone. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant transport impacts. There is potential for on site parking and servicing.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs in principle and therefore there are no immediate land use conflicts. The terms available for these units are flexible with short leases and they offer small businesses affordable space which, particularly small and medium enterprises, may not be able to access otherwise. This type of workspace is one of the most important and beneficial for local business in the borough and positively helps meet the demand for workspace by SMEs.

The site is also located within the inner and middle zones of the Kennington Gasholder potential hazard zone as defined by the Health and Safety Executive (HSE).

**Potential waste management capacity:** The make up of the building, with a series of smaller business units, means that the scale of any waste management use in one or several of the units is unlikely to contribute significantly to the borough's waste apportionment.

**Deliverability:** The site is a large managed business centre and is not expected to come forward within the plan period with waste management uses that would contribute significantly to the borough's waste apportionment (although this cannot be ruled out).

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** This KIBA contains a managed business centre comprising a mix of small business units and some other warehouse and storage units. This site is unlikely to accommodate waste management uses of a scale which would significantly contribute to the borough's waste apportionment.

**Recommendation:** This KIBA is not considered to be one of the most appropriate locations for waste management uses.

## KIBA 8: Ellerslie Industrial Estate



**Site area:** 2.93 ha

**Ownership:** Mixed

**Ward:** Brixton Hill

**Site Description:** The KIBA is located between Brixton and Clapham and is relatively centrally located within the borough. The KIBA fronts onto Acre Lane to the north and Kings Avenue to the west and comprises a small industrial estate and a number of larger industrial buildings. The surrounding area is predominately residential although commercial properties are also situated along the northern boundary (across Acre Lane) and along the western boundary (across Kings Avenue).

**Existing use(s):** Various industrial and warehouse uses.

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The KIBA is not situated within a designated Conservation Area. Across Kings Avenue to the west is the Clapham Park Road/Northbourne Road Conservation Area (CA 17) and No's 194 & 196 Clapham Park Road which are opposite the site (across Kings Avenue) are grade II listed buildings.

**Traffic and access:** Transport access to the area is from Acre Lane, which is a London distributor road and from Kings Avenue, which is a local distributor road. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant transport impacts. There is potential for on site parking and servicing.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs in principle and therefore there are no immediate land use conflicts. Industrial uses

abut the site to the south and east which limits any potential land use conflicts. A buffer between any waste management uses and adjoining residential properties may need to be considered depending on the facility/operations proposed.

**Potential waste management capacity:** The KIBA contains a mixture of accommodation including large sites and larger industrial units. The make up of the industrial estate means that waste management uses in one or several of the units or sites could be accommodated and could positively contribute to the borough's waste apportionment.

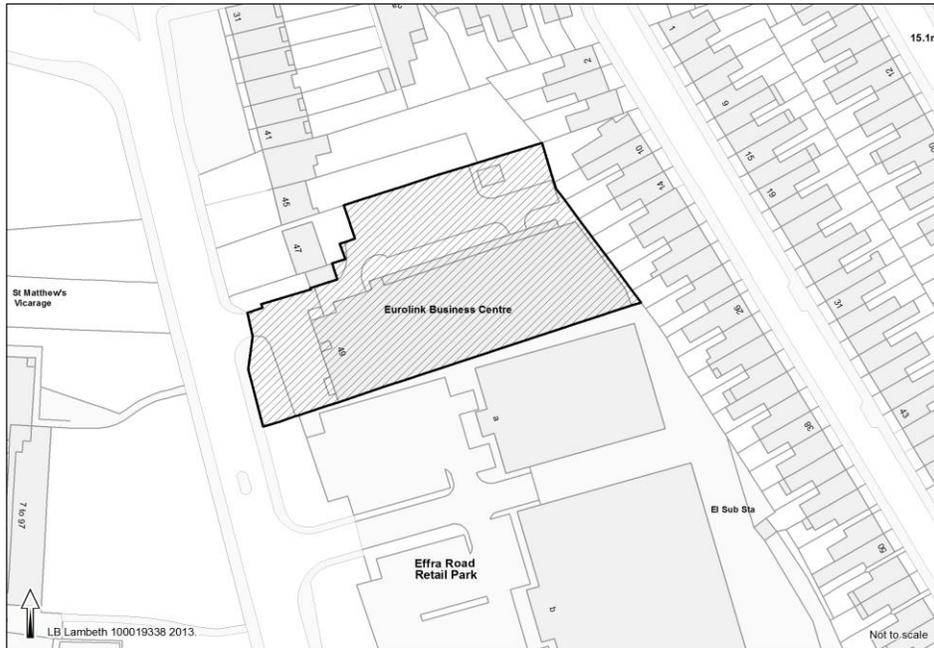
**Deliverability:** The site contains some sites and premises which potentially could be taken up by a waste management use; however, there are no know plans for new waste management uses at present.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** The area contains a number of industrial and warehouse units and a managed industrial estate and there is good road access. The KIBA would be a particularly appropriate location for smaller scale waste management operations and this would assist the council's in meeting the London Plan apportionment requirement.

**Recommendation:** This KIBA is considered to be one of the most appropriate locations for new waste management uses.

### KIBA 9: Eurolink Business Centre



**Site area:** 0.34 ha

**Ownership:** Unit Management Ltd

**Ward:** Coldharbour

**Site Description:** The site is located on the eastern side of Effra Road and comprises a managed business centre. The surrounding area is mixed with residential located to the north, east and west of the site and a retail park to the south.

**Existing use(s):** Managed business centre comprising small B1 business units.

**Nature conservation:** The KIBA is within Rush Common Land.

**Historic environment and built heritage:** The KIBA is within the Brixton Conservation Area (CA26) and the building is locally listed.

**Traffic and access:** The KIBA has access directly onto Effra Road which forms part of the Transport for London Road Network. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant transport impacts. The site has limited controlled on site parking.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs and therefore there are no immediate land use conflicts in principle. Eurolink Business Centre is managed by Unit Management which works in partnership with small to medium size organisations. Eurolink Business Centre provides office and storage space at flexible and affordable terms and currently house over 100 companies. This type of workspace is one of the most important and beneficial for local businesses in the borough and positively helps meet the demand for workspace by SMEs.

Directing waste uses to this KIBA is not preferred given the types of managed commercial space that is provided within the business centre. The focus for this KIBA should be on enhancing the type of commercial floor space which presently exists and waste uses should be directed to sites which presently do not and which are unlikely to be capable of providing such intensive employment uses.

**Potential waste management capacity:** The make up of the building, with a series of smaller business units, means that the scale of any waste management use in one or several of the units is unlikely to contribute significantly to the borough's waste apportionment.

**Deliverability:** The site is a large managed business centre and is not expected to come forward within the plan period with any significant waste management uses which will contribute to the borough's waste apportionment. However, this cannot be ruled out.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** This KIBA contains managed business units and is unlikely to accommodate waste management uses of a scale which would significantly contribute to the borough's waste apportionment.

**Recommendation:** This KIBA is not considered to be one of the most appropriate locations for waste management uses.

## KIBA 10: Freemans



**Site area:** 0.38 ha

**Ownership:** Unknown

**Ward:** Vassall

**Site Description:** The site is located to the north east of Stockwell and fronts onto Clapham Road. The wider Freemans site was recently comprehensively developed for mixed use with residential and business uses intertwined. The KIBA boundary was readjusted to remove the parts of the KIBA which were redeveloped for residential and other associated uses. The surrounding area is predominately residential.

**Existing use(s):** Office and business uses

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The Stockwell Park Conservation Area (CA 5) covers the site and part of the site is located within an archaeological priority area.

**Traffic and access:** Clapham Road forms part of the Transport for London Road Network. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant transport impacts.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs and therefore there are no immediate land use conflicts. The site was formerly a mixed use employment area and therefore contains a number of mixed use schemes which include residential, therefore is it considered inappropriate to direct waste uses in this area.

**Potential waste management capacity:** The new business units within the KIBA provide a

series of smaller business units. The scale of any waste management use in one or several of the units is unlikely to contribute significantly to the borough's waste apportionment.

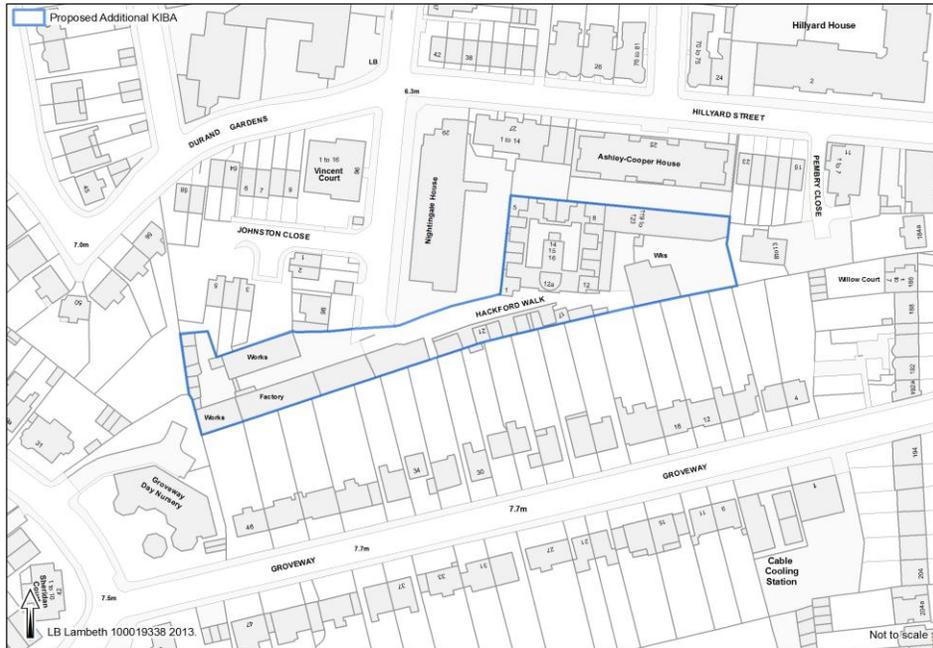
**Deliverability:** No sites have been identified within the KIBA as potentially being able to accommodate waste management uses.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** The wider site comprises a recent mixed use development and it is considered inappropriate to direct waste management uses in this location.

**Recommendation:** This KIBA is not considered to be one of the most appropriate locations for waste management uses.

### KIBA 11: Hackford Walk (Proposed)



**Site area:** 0.44 ha

**Ownership:** Private

**Ward:** Vassall

**Site Description:** The proposed KIBA is a back-land site comprising a number of industrial and business units clustered along a central access road. The site adjoins the rear of residential gardens to the south, east and west and residential blocks of flats to the north.

**Existing use(s):** Small business and industrial units; Type Museum.

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The KIBA is not within a conservation area but is close to the Stockwell Park (CA5), Brixton Road (CA6) and Hackford Road (CA16) conservation areas.

**Traffic and access:** Access to the KIBA is via Hackford Road, which is unclassified. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant transport impacts.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs and therefore there are no immediate land use conflicts in principle.

**Potential waste management capacity:** The industrial estate is small in size. There is potentially scope for smaller scale waste management uses to locate within it, depending on their nature, but these are unlikely to contribute significantly to meeting Lambeth's waste apportionment during the plan period.

**Deliverability:** The site is a small industrial estate with some potential for small scale waste management uses. The likelihood of small scale waste management uses coming forward in this location within the plan period is not known

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** Waste management uses are acceptable in principle but this KIBA is small and is unlikely to accommodate waste management uses of a scale which would significantly contribute to the borough's waste apportionment

**Recommendation:** This KIBA is not considered to be one of the most appropriate locations for new waste management uses.

## KIBA 12: Hamilton Road Industrial Estate



**Site area:** 0.48 ha

**Ownership:** Workspace Group Ltd

**Ward:** Gipsy Hill

**Site Description:** The site is located on the western side of Hamilton Road and comprises a number of industrial units. The surrounding area is predominately residential.

**Existing use(s):** Industrial centre managed by Workspace Group.

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The KIBA is not within a Conservation Area and does not contain any listed buildings.

**Traffic and access:** The KIBA has access directly onto Hamilton Road which is an unclassified access road. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant transport impacts.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs and therefore there are no immediate land use conflicts in principle. The industrial units in this KIBA are managed by Workspace Group. Workspace Group are one of the leading providers of flexible and affordable employment workspace in London. Workspace manage a number of industrial and business centres in the borough most of which are located in KIBAs including Hamilton Road Industrial Estate. The terms available for these units are flexible with short leases and they offer small businesses affordable space which, particularly small and medium enterprises, may not be able to access otherwise.

The focus for this KIBA should be on enhancing the type of commercial floor space which presently exists and waste uses should be directed to sites which presently do not and which are unlikely to be capable of providing such intensive employment uses.

**Potential waste management capacity:** The industrial estate is small in size and contained a small number of units. The scale of any waste management use in one or several of the units is unlikely to contribute significantly to the borough's waste apportionment.

**Deliverability:** There are no known proposals for waste management uses within this KIBA. The likelihood of significant waste management uses locating within this KIBA during the plan period is considered low, although it cannot be ruled out.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** This KIBA contains a small managed industrial estate and is unlikely to accommodate waste management uses of a scale which would significantly contribute to the borough's waste apportionment.

**Recommendation:** This KIBA is not considered to be one of the most appropriate locations for waste management uses.

### KIBA 13: Kennington Business Park



**Site area:** 2.49 ha

**Ownership:** Workspace Group Ltd

**Ward:** Vassall

**Site Description:** The KIBA is bounded by Camberwell New Road to the east, Brixton Road to the west and Cranmer Road to the south. The site contains a number of business and industrial buildings. The surrounding area is mixed with local shopping facilities located along Camberwell New Road and Brixton Road and residential properties along Cranmer Road. Kennington Park is to the north of the KIBA.

**Existing use(s):** Business centre with various types of units including affordable start up business space. The centre is managed by Workspace Group.

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** Part of the KIBA is within an archaeological priority area. The Vassall Road Conservation Area (CA 7) is located to the east of the site.

**Traffic and access:** The KIBA has access onto Brixton Road and Camberwell New Road which are both form part of the Transport for London Road Network. The site is located close to the boundary of the Congestion Charge Zone. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant transport impacts.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs and therefore there are no immediate land use conflicts in principle. The business units in this KIBA are managed by Workspace Group. Workspace Group is one of the leading providers of flexible and affordable employment workspace in London. Workspace

manage a number of industrial and business centres in the borough most of which are located in KIBAs including Kennington Business Park. The terms available for these units are flexible with short leases and they offer small businesses affordable space which, particularly small and medium enterprises, may not be able to access otherwise. This type of workspace is one of the most important and beneficial for local businesses in the borough and positively helps meet the demand for workspace by SMEs.

The council has met with Workspace Group to discuss their future proposals for this business centre. They advised that they have a vision for creating a mixed use business environment offering diverse facilities and services. The priority for this KIBA should be on enhancing the type of commercial floor space which presently exists.

**Potential waste management capacity:** The make up of the building, with a series of smaller business units, means that the scale of any waste management use in one or several of the units is unlikely to contribute significantly to the borough's waste apportionment.

**Deliverability:** The site is a large managed business centre with various types and sizes of workspaces. The make up of the centre means that it would not be expected to come forward within the plan period with any significant waste management uses which will contribute to the borough's waste apportionment, although this cannot be ruled out.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** This KIBA is unlikely to accommodate waste management uses of a scale which would significantly contribute to the borough's waste apportionment.

**Recommendation:** This KIBA is not considered to be one of the most appropriate locations for new waste management uses.

## KIBA 14: Lion Yard



**Site area:** 0.17 ha

**Ownership:** Unknown

**Ward:** Ferndale

**Site Description:** The KIBA is situated between residential properties which front onto Tremadoc Road and Cato Road and is accessed from Tremadoc Road. Further commercial premises buffer the commercial units along the south and eastern boundary. The surrounding area is predominately residential, although Clapham High Street district town centre is located in close proximity to the site.

**Existing use(s):** Small business estate premises predominately comprising B1 uses. It is proposed to extend the KIBA to include all premise within the estate.

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The KIBA is not situated within a designated Conservation Area nor does it contain any listed buildings. The Clapham High Street Conservation Area (CA 22) adjoins the KIBA boundary to the north.

**Traffic and access:** The KIBA has access onto Tremadoc Road which connects to Clapham High Street which forms part of the Transport for London Road Network. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant transport impacts.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs in principle and therefore there are no immediate land use conflicts. However, this is

a small KIBA and potential impacts on neighbouring residential amenity would need particular consideration.

**Potential waste management capacity:** The make up of the buildings, with a series of smaller business units, suggests that the scale of any waste management use in one or several of the units is unlikely to contribute significantly to the borough's waste apportionment.

**Deliverability:** There are no known proposals for waste management uses within this KIBA. The KIBA comprises small business units and is considered unlikely to come forward within the plan period with any significant waste management uses that could contribute to the borough's waste apportionment; although this cannot be ruled out.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** This KIBA contains a number of small scale business units and is unlikely to accommodate waste management uses of a scale which would significantly contribute to the borough's waste apportionment.

**Recommendation:** This KIBA is not considered to be one of the most appropriate locations for new waste management uses.

## KIBA 15: Loughborough Road Key Industrial Business Area



**Site area:** 1.28 ha

**Ownership:** Mixed

**Ward:** Coldharbour

**Site Description:** The KIBA is situated in the north-west of Loughborough Junction Station, in the east of the borough. The KIBA comprises a number of railway arches which are all in employment uses, plus land fronting the arches. It is proposed to extend the boundary of the KIBA to encompass the full extent of the arches. Access to the site is via Rathgar Road which connects to Loughborough Road and Wickwood Street. To the north west of the site is an adventure playground and area of open space. Directly to the west of the site is a residential housing estate and to the east, beyond the railway line, are terraced houses which front onto Coldharbour Lane. South west of the site is another residential housing estate which is accessed from Loughborough Road.

**Existing use(s):** The KIBA is currently occupied by a number of employment uses including car breakers, mechanics and general industry.

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The KIBA and its surrounds are not within a Conservation Areas and there are no listed buildings within the vicinity of the site.

**Traffic and access:** The KIBA has dual access from Rathgar Road which connects to Loughborough Road and Wickwood Street. Loughborough Road connects onto Coldharbour Lane which is a local distributor road. Access to the site is restricted by width and by height under the railway. The site is not suitable for intensive uses or large vehicles. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to cause

adverse transport impacts.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs and therefore there are no immediate land use conflicts. There are residential properties to the west of the site. A buffer between any waste management uses and residential properties may need to be considered depending on the facility/operations proposed.

**Potential waste management capacity:** The KIBA contains a mixture of accommodation including a number of railway arches, which have potential to provide accommodation for new waste management uses.

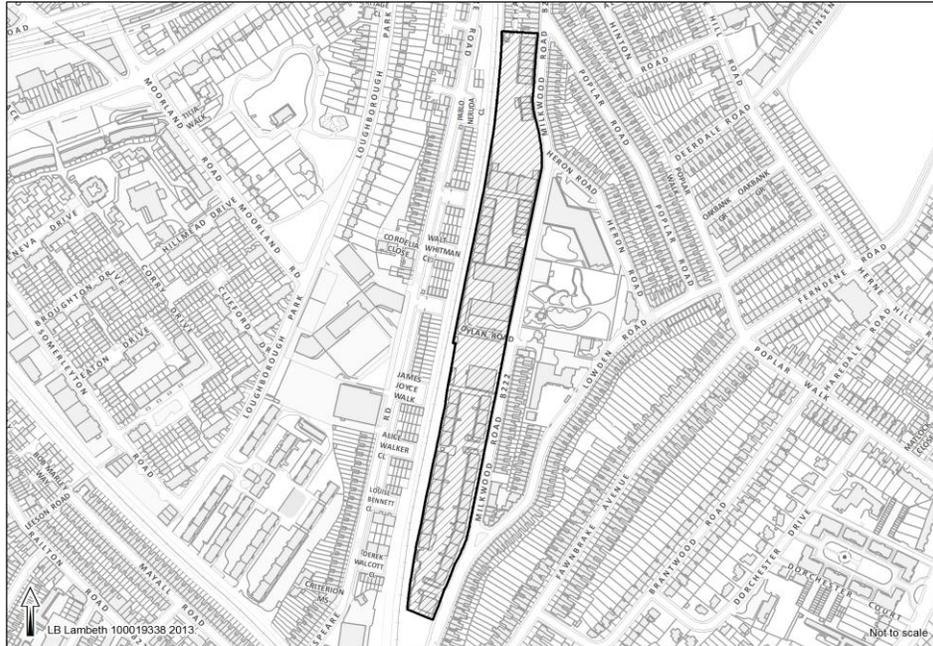
**Deliverability:** Part of the site is currently in waste management use (Railway Arch 439, Wickwood Street). The site contains some premises which have potential for additional waste management uses. However, there are no known proposals at present.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** This KIBA already has an existing waste management site within it and there is potential to accommodate further waste management uses in principle.

**Recommendation:** This KIBA is considered to be one of the most appropriate locations for new waste management uses.

## KIBA 16: Milkwood Road Estates



**Site area:** 3.18 ha

**Ownership:** Mixed including Workspace Group Ltd and London Borough of Lambeth

**Ward:** Herne Hill

**Site Description:** The KIBA is located close to the eastern boundary of the borough and comprises a linear strip of commercial and industrial premises which sit between the railway line to the west and Milkwood Road to the east. There are a number of industrial estates including the Mahatma Gandhi Industrial Estate part of which is managed by the council and the remainder by Workspace Group. Another industrial estate is situated at the southern end of the site and various other employment sites are located between these industrial estates. To the east, on the opposite side of Milkwood Road, is a row of terraced housing and Willowfield Primary School.

**Existing use(s):** There are a number of industrial and commercial uses within the three industrial estates as well as on other sites within the KIBA. Part of the KIBA is also used as waste vehicle depot site operated by Veolia on behalf of the council.

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The site and its surrounds are not within a Conservation Areas and there are no listed buildings within the vicinity of the site.

**Traffic and access:** There are various vehicle access points onto Milkwood Road which connects to Coldharbour Lane. Traffic and safety issues would need to be considered on Milkwood Road in particular. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant transport impacts.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs in principle and therefore there are no immediate land use conflicts. A buffer between any waste management uses and residential properties may need to be considered depending on the facility/operations proposed.

**Potential waste management capacity:** The KIBA contains a mixture of accommodation including large industrial units. The make up of the industrial estates and infill sites means that waste management uses on one or several of the sites/premises could be accommodated and could positively contribute to the borough's waste apportionment.

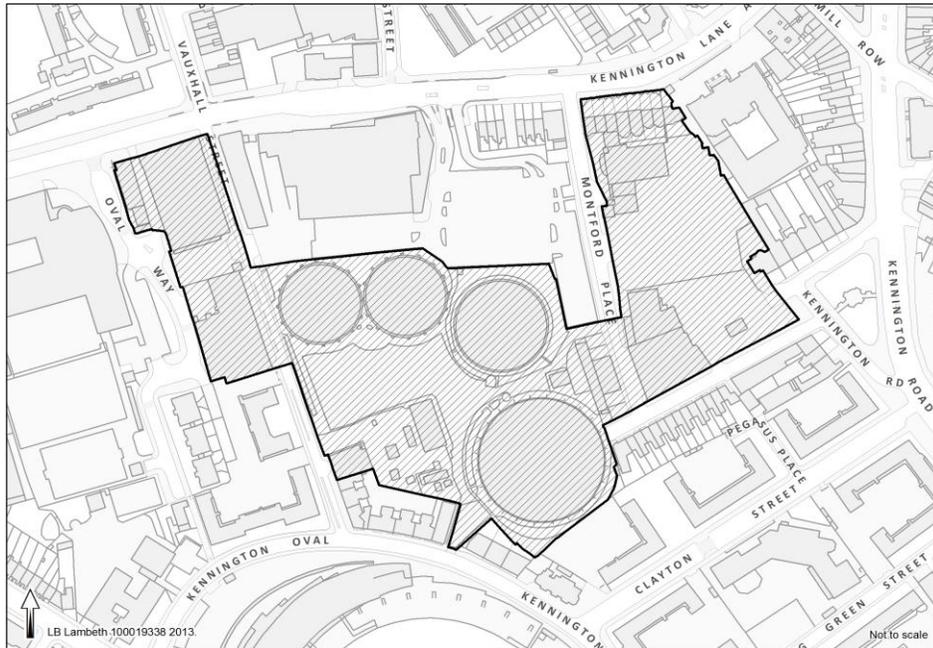
**Deliverability:** The KIBA contains some sites and premises which could be taken up by a waste management use including Units 1-24 Mahatma Gandhi Industrial Estate.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** The area contains a number of industrial and warehouse units and a managed industrial estate. These sites would assist the council's in meeting the London Plan apportionment.

**Recommendation:** This KIBA is considered to be one of the most appropriate locations for new waste management uses.

### KIBA 17: Montford Place – Beefeater/Oval Gasworks



**Site area:** 3.81 ha

**Ownership:** Mixed

**Ward:** Oval

**Site Description:** The KIBA is located in the north of the borough close to the Central Activities Zone. The area is off Kennington Lane and includes the Kennington Gas Holders and the Beefeater's Gin Distillery. There are also a number of small scale office units located within listed buildings which front Kennington Lane. A Tesco Superstore lies adjacent to the site and there are also residential properties and a school located along the periphery of the KIBA.

**Existing use(s):** Mix of offices, light industry and storage and distribution uses.

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** Part of the KIBA is located within the Kennington Conservation Area (CA 8). Numbers 231-245 Kennington Lane are grade II listed buildings within the site. Imperial Court and numbers 346-356 Kennington Road are also grade II listed buildings which adjoin the site.

**Traffic and access:** The KIBA has good access onto Kennington Lane which forms part of the Transport for London Road Network. The site is located on the boundary of the Congestion Charge Zone. Vauxhall Street has access from Kennington Lane which forms part of the Transport for London Road Network.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs and therefore there are no immediate land use conflicts. A buffer between any waste

management uses and residential properties may need to be considered depending on the facility/operations proposed.

The site is located within the inner and middle zones of the Kennington Gasholder potential hazard zone as defined by the Health and Safety Executive (HSE).

**Potential waste management capacity:** The KIBA contains a mixture of commercial accommodation and make up of the KIBA means that waste management uses in one or several of the premises/sites could be accommodated and could positively contribute to the borough's waste apportionment.

**Deliverability:** The KIBA contains some sites and premises which could potentially be taken up by a waste management use including land to the east of Montford Place and 142-170 Vauxhall Street. However, there are no known proposals at present.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** The area contains some vacant land and a number of unoccupied premises which could present development opportunities for waste management.

**Recommendation:** This KIBA is considered to be one of the most appropriate locations for new waste management uses.

### KIBA 18: Park Hall Trading Estate



**Site area:** 0.90 ha

**Ownership:** Workspace Group Ltd

**Ward:** Gipsy Hill

**Site Description:** The KIBA is situated along the boundary of West Norwood cemetery to the west and behind a number of residential properties which front onto Martell Road to the east. The surrounding area is predominately residential. The Vale Street depot and reuse and recycling centre is located directly to the south of the site.

**Existing use(s):** Managed business/industrial centre majority of which are made up of a mix of industrial/business units and some other warehouse and storage units

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints. The western boundary of the site adjoins the Norwood Cemetery which is designated as an area of Local Nature Conservation Importance.

**Historic environment and built heritage:** The northern part of the KIBA is within the Norwood Conservation Area (CA 24).

**Traffic and access:** The KIBA has access onto Martell Road and Park Hall Road which are both unclassified access road. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant transport impacts.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs in principle and therefore there are no immediate land use conflicts. The business units in this KIBA are managed by Workspace Group. Workspace Group are one of the leading providers of flexible and affordable employment workspace in London. Workspace manage a number of industrial and business centres in the borough most of which are

located in KIBAs including Park Hill Trading Estate. The terms available for these units are flexible with short leases and they offer small businesses affordable space which, particularly small and medium enterprises, may not be able to access otherwise. This type of workspace is one of the most important and beneficial for local businesses in the borough and positively helps meet the demand for workspace by SMEs. The priority for this KIBA should be on enhancing this type of commercial floor space.

**Potential waste management capacity:** The make up of the building as a managed business centre suggests that this location is unlikely to contribute significantly to the borough's waste apportionment during the plan period.

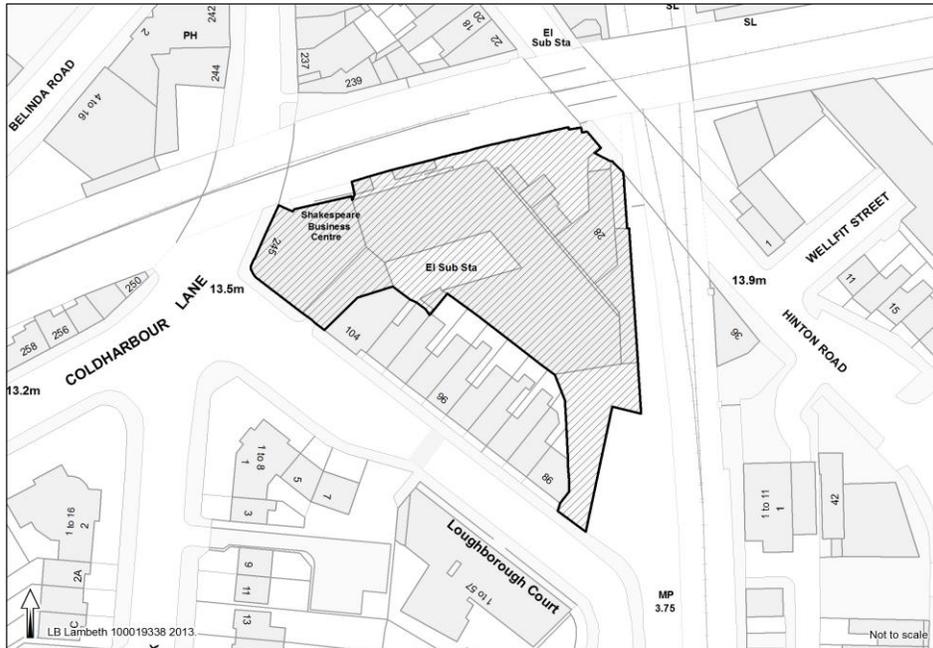
**Deliverability:** The site is a large managed business centre and is unlikely to come forward within the plan period with any significant waste management uses which will contribute to the borough's waste apportionment.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** This KIBA contains a managed business centre comprising a mix of industrial/business units and some other warehouse and storage units. This site is not expected to accommodate waste management uses of a scale which would significantly contribute to the borough's waste apportionment, although this cannot be ruled out.

**Recommendation:** This KIBA is not considered to be one of the most appropriate locations for waste management uses.

## KIBA 19: Shakespeare Road Business Centre



**Site area:** 0.28 ha

**Ownership:** Bizspace Ltd

**Ward:** Herne Hill

**Site Description:** The KIBA is situated between two railway lines and fronts into Shakespeare Road. The surrounding area is mixed with a number of business and employment uses located immediately around the railway lines while to the south are a number of residential properties.

**Existing use(s):** Managed business/industrial centre comprising a number of units of various sizes including office, studio and workshop premises.

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The KIBA and its surrounds are not within a Conservation Areas and there are no listed buildings within the vicinity of the site.

**Traffic and access:** The KIBA has access onto Shakespeare Road which connects to Coldharbour Lane, a London distributor road. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant transport impacts. There is some secure on site loading area however limited space available for on site parking.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs in principle and therefore there are no immediate land use conflicts. The business units in this KIBA are managed by Biz Space. Biz Space is a leading providers of flexible and affordable employment workspace in London. Biz Space manage a number of business

centres in the borough most of which are located in KIBAs including Shakespeare Road Business Centre. The business centre is arranged around a small central courtyard and provides approximately sixty business units of various sizes. The centre provides flexible business accommodation including office, studio and workshop premises on short/medium term licence agreements. This type of workspace is one of the most important and beneficial for local businesses in the borough and positively helps meet the demand for workspace by SMEs. The priority for this KIBA should be on enhancing this type of commercial floor-space.

**Potential waste management capacity:** The make up of the building, with a series of smaller business units, means that the scale of any waste management use in one or several of the units is unlikely to contribute significantly to the borough's waste apportionment.

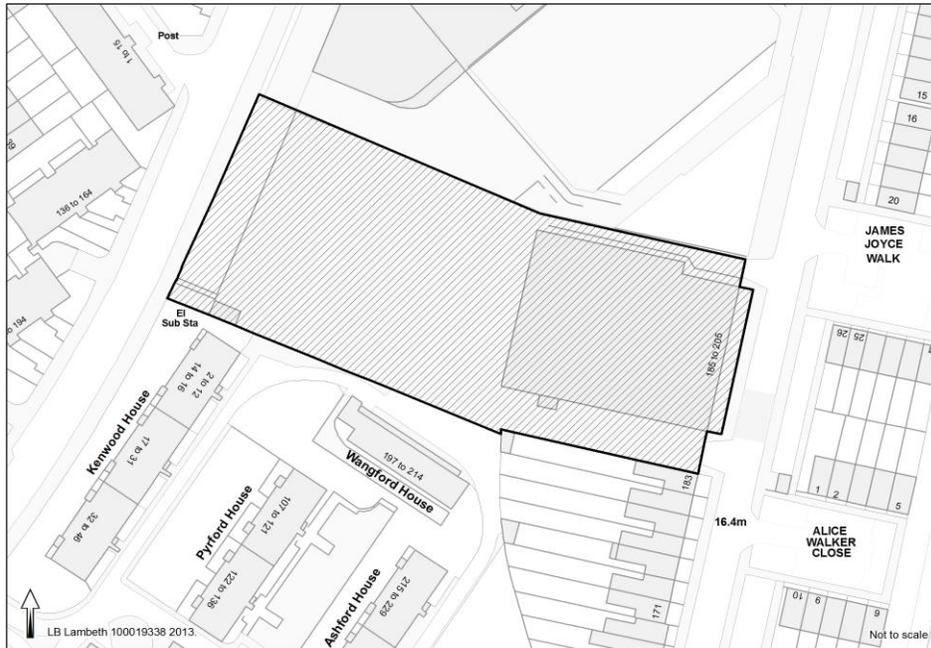
**Deliverability:** The site is a large managed business centre and is not expected to come forward within the plan period with any significant waste management uses which will contribute to the borough's waste apportionment.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** This KIBA contains a managed business centre comprising a mix of industrial/business units and some other warehouse and storage units. This site is not expected to accommodate waste management uses of a scale which would significantly contribute to the borough's waste apportionment, although this cannot be ruled out.

**Recommendation:** This KIBA is not considered to be one of the most appropriate locations for waste management uses.

## KIBA 20: Shakespeare Road Depot



**Site area:** 0.59 ha

**Ownership:** London Borough of Lambeth

**Ward:** Coldharbour

**Site Description:** This KIBA encompasses the Shakespeare Road council depot and offices. The land immediately to the north has recently been developed as a secondary school. The KIBA has a frontage to both Shakespeare Road and Loughborough Park. The surrounding area is predominately residential with housing to the south east and west.

**Existing use(s):** The existing use of the site is as a waste vehicle depot site, with associated offices. The depot is operated by Veolia on behalf of London Borough of Lambeth.

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The KIBA is not situated within a Conservation Areas. North of the site, beyond the school, is the Loughborough Conservation Area (CA 27). A number of listed buildings fall within this conservation area, fronting onto Loughborough Park.

**Traffic and access:** Access to the site is via Shakespeare Road and Loughborough Park which connect to Coldharbour Lane, a London distributor road. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant transport impacts. Detailed assessments of transport impacts would be required once the type of waste management facility was known. Larger scale waste management uses are unlikely to be acceptable, but given the site size they are unlikely to be proposed. The site is situated on a residential road and next to a school and therefore would not be suitable for very large vehicles.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs in principle and therefore there are no immediate land use conflicts. There are residential properties directly to the south of the site and to the east and west across Shakespeare Road and Loughborough Park respectively. A school is also located immediately to the north. A buffer between any waste management uses and sensitive surrounding uses may need to be considered depending on the facility/operations proposed.

**Potential waste management capacity:** The make up of this KIBA means that waste management uses could be accommodated and could positively contribute to the borough's waste apportionment.

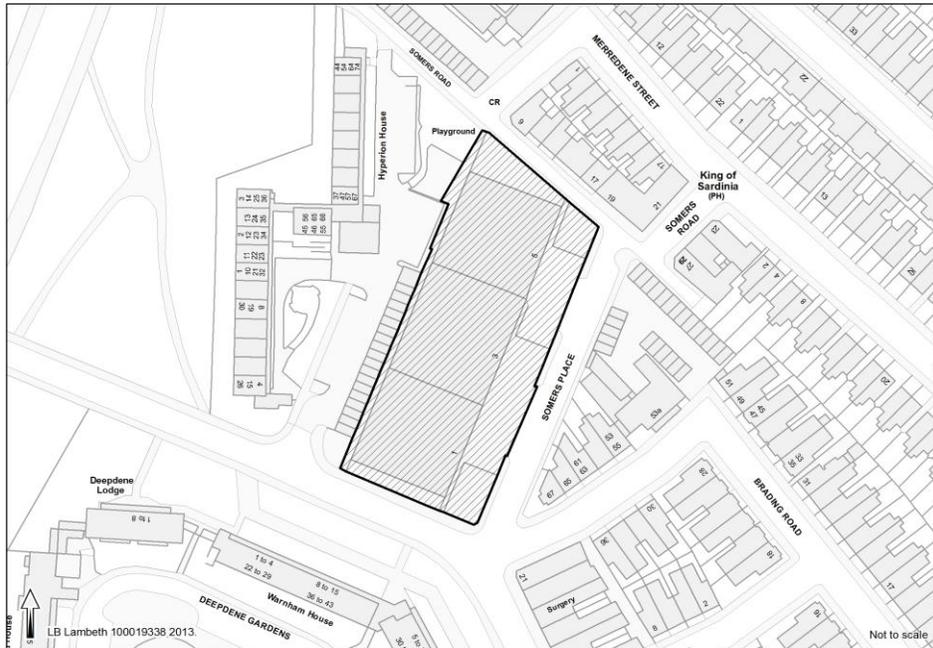
**Deliverability:** There are no known plans at present for use of this site for waste management.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present. The London Heat Study (June 2010) also states that in Brixton the 16 hectares of land under council ownership and should be prioritised for potential network connections. In particular the Somerleyton Road area has been identified as a key regeneration area and a CHP unit identified in this area. A recent planning application for the Loughborough Park Estate also proposes CHP. There are several opportunities to link to proposed future CHP.

**Conclusions:** This KIBA is considered to have good potential in principle for future waste management uses.

**Recommendation:** This KIBA is considered to be one of the most appropriate locations for new waste management uses.

## KIBA 21: Somers Place



**Site area:** 0.39 ha

**Ownership:** Unknown

**Ward:** Brixton Hill

**Site Description:** The KIBA is along the western side of Somers Place and comprises three warehouse units. The surrounding area is residential.

**Existing use(s):** Warehouses

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The KIBA is not within a Conservation Area and there are no listed buildings within the vicinity of the site. The northern boundary of the KIBA adjoins the Rush Common Brixton Hill Conservation Area (CA 49).

**Traffic and access:** The KIBA has access onto Shakespeare Road which connects to Coldharbour Lane, a London distributor road. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant transport impacts.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs in principle and therefore there are no immediate land use conflicts. A buffer between any waste management uses and residential properties may need to be considered depending on the facility/operations proposed.

**Potential waste management capacity:** The KIBA contains three warehouse units with potential in principle to accommodate waste management uses.

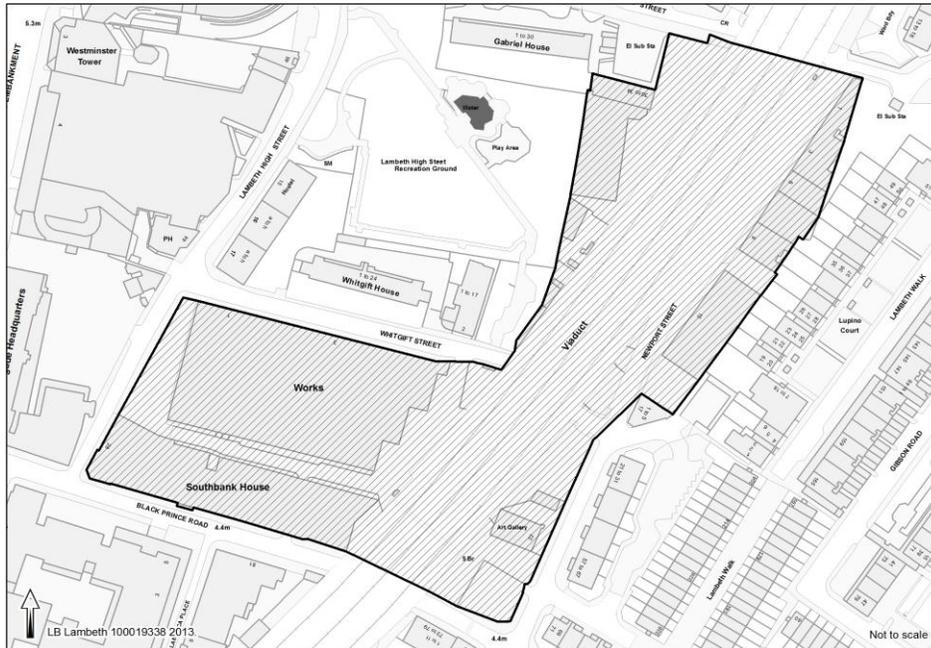
**Deliverability:** There are no known plans for new waste management uses within this KIBA at present.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** This nature of the premises in, and access to, this KIBA suggest that it may be one of the more appropriate locations for new waste management uses.

**Recommendation:** This KIBA is considered to be one of the more appropriate locations for waste management uses.

## KIBA 22: Southbank House/Newport Street



**Site area:** 2.36

**Ownership:** Mixed including London Fire and Emergency Planning Authority

**Ward:** Princes

**Site Description:** The KIBA is situated in the north of the borough and is located predominately along the east and western boundary of the railway line and extends along part of Black Prince Road, Newport Street and Lambeth High Street. There are a number of industrial and warehouse units/premises located within the area as well as Southbank House which is a managed serviced office building. The surrounding area is mixed, with a park and recreation ground as well as residential properties adjoining parts of site to the north and east.

**Existing use(s):** Various industrial, warehouse and office uses

**Nature conservation:** The site and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** Part of the site and its surrounds are located within the Albert Embankment Conservation Area (CA57). The London Fire Brigade headquarters building which fronts onto Albert Embankment is a Grade II Listed Building as is Southbank House situated to the south of the site. Part of the site is also located within the Background Consultation Areas for Parliament Hill to Westminster and Primrose Hill to Westminster. The site is also located within an Archaeological Priority Area.

**Traffic and access:** The site has access onto Lambeth High Street and Whitgift Street. The site has poor access and poor geometry at Albert Embankment/Black Prince Road and Black Prince Road/Lambeth High Street junctions. Most of the sites within this location are not suitable for large lorries or significant traffic generation.

**Potential land use conflict:** The site is located within the Central Activities Zone, the Thames Policy Area and within the Vauxhall Nine Elms and Battersea Opportunity Area. None of these designations indicates that waste management uses are inappropriate in these locations. Additionally, waste management uses are considered appropriate within KIBAs in principle so there are no immediate land use conflicts. A buffer between any waste management uses and residential properties may need to be considered depending on the facility/operations proposed.

**Potential waste management capacity:** The KIBA contains a mixture of accommodation with a number of railway arches and industrial sites. The make up of the industrial estate means that waste management uses in one or several of the units could be accommodated and could positively contribute to the borough's waste apportionment.

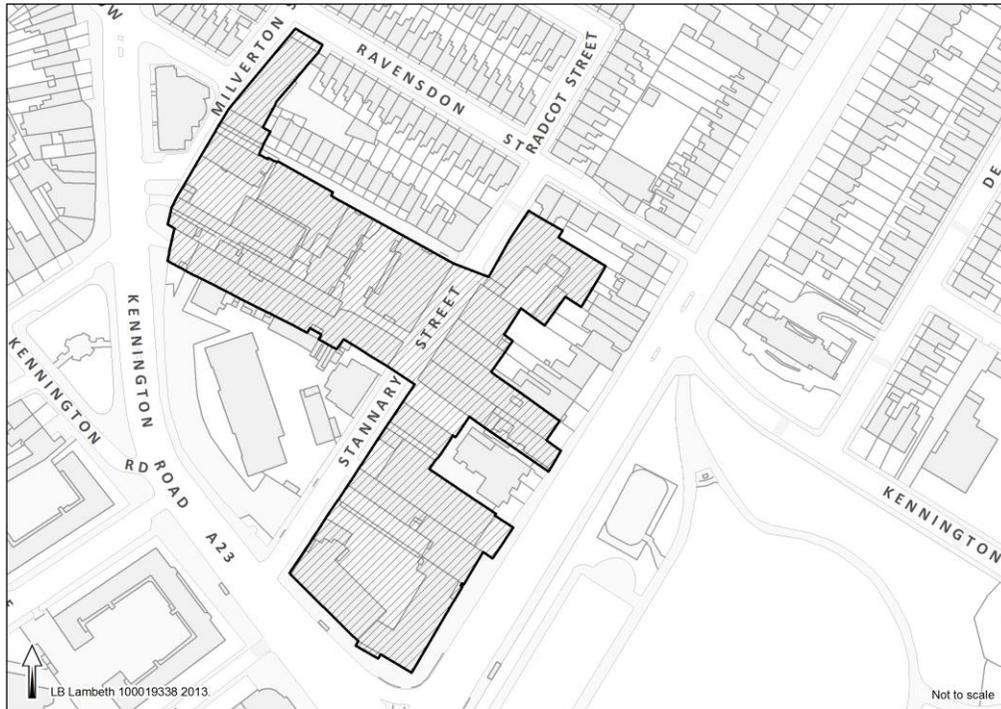
**Deliverability:** The site is located within a KIBA and contains some sites and premises which and could be taken up by a waste management use

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** The area contains a number of industrial and warehouse units that could accommodate smaller scale waste management operations. This KIBA also provides one of the few opportunities to locate waste management uses in the north of the borough.

**Recommendation:** This KIBA is considered to be one of the most appropriate locations for new waste management uses.

### KIBA 23: Stannary Street



**Site area:** 1.35 ha

**Ownership:** Mixed

**Ward:** Oval

**Site Description:** The KIBA is bounded by Kennington Park to the east and Kennington Road to the west. The surrounding area is mixed with various residential and business uses intertwined. The south part of the KIBA also falls within Kennington Park Road local centre and various small scale retail units are located in this area.

**Existing use(s):** Various industrial, warehouse and work live office uses

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The entire KIBA is within the Kennington Conservation Area (CA8).

**Traffic and access:** Kennington Road and Kennington Park Road form part of the Transport for London Road Network. Access to other roads within the KIBA is likely to be restricted and would be limited to smaller vehicles. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant transport impacts.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs in principle and therefore there are no immediate land use conflicts, although proximity to residential uses will need to be considered.

The site is located within the inner and middle zones of the Kennington Gasholder potential hazard zone as defined by the Health and Safety Executive (HSE).

**Potential waste management capacity:** The make up of the KIBA means that the scale of any waste management use in one or several of the units/sites is unlikely to contribute significantly to the borough's waste apportionment.

**Deliverability:** The site is located within a KIBA and contains some sites and premises which could be taken up by a waste management use.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** The make up of this KIBA, including some work-live units, means that new waste management uses are not necessarily expected to come forward in the short to medium term in this location. However, in principle they would be supported.

**Recommendation:** This KIBA is not considered to be one of the most appropriate locations for waste management uses.

## KIBA 24: Timber Mill Way



**Site area:** 2.85 ha

**Ownership:** Mixed

**Ward:** Larkhall

**Site Description:** The KIBA is located in the west of the borough near the intersection of Timber Mill Way and Gauden Road. Timber Mill Way is a private right of way shared by several industrial properties. This part of the site has two access points from Gauden Road and Gauden Place and contains a number of business and industrial uses. To the south west of the site is a railway line and beyond this Clapham North Business Centre which is accessed from Voltare Road. Residential properties surround the property to the south west along Voltare Road and to the north along Gauden Road. A railway line runs also through the centre of the KIBA.

**Existing use(s):** Various industrial, warehouse and office uses

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The KIBA is not situated within a Conservation Areas. Part of the site lies adjacent to the Sibella Road Conservation Area, incorporating properties in Gauden Road. There are no listed buildings within the curtilage of the site. Clapham High Street railway station is located to the southwest of the site on the opposite side of the railway embankment and this is a listed building.

**Traffic and access:** The main access to Timber Mill Way is from Gauden Road to the south of the KIBA. Access to Clapham North Business Centre is via Voltare Road. Gauden Road and Voltare Road both connect to Clapham High Street which forms part of the Transport for London Road Network. Access onto Clapham High Street from Gauden Road in particular is

poor and not suited to larger vehicles and/or significant traffic generation. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant transport impacts.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs and therefore there are no immediate land use conflicts. There are residential properties directly to the east of the site, on the opposite side of Timber Mill Way and along Voltaire Road. A buffer between any waste management uses and residential properties may need to be considered depending on the facility/operations proposed.

**Potential waste management capacity:** The KIBA contains a mixture of sites with land and premises of a large enough size which means that waste management uses in one or several of the units could be accommodated and could positively contribute to the borough's waste apportionment.

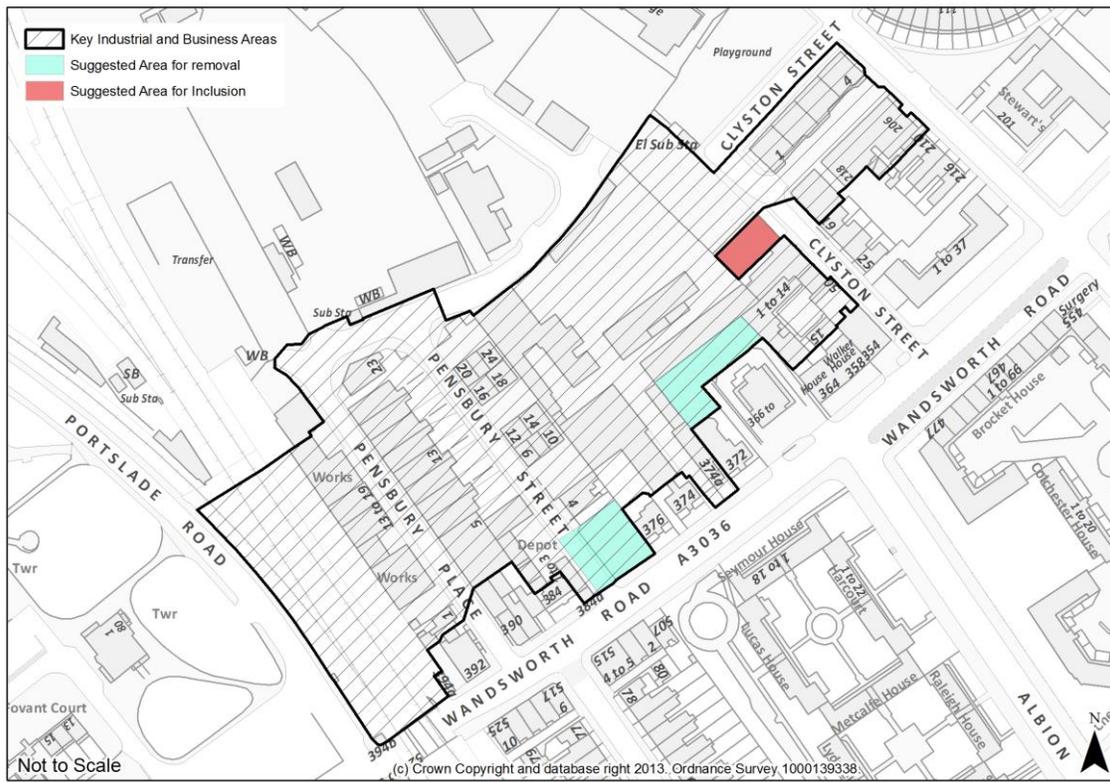
**Deliverability:** The KIBA contains some sites and premises which could be taken up by a waste management use including the area to the front of Safestore, 4 Timbermill Way.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** The area contains a number of industrial and warehouse units and a business centre and any of these could facilitate various smaller scale waste management operations.

**Recommendation:** This KIBA is considered to be one of the most appropriate locations for new waste management uses.

## KIBA 25: Wandsworth Road



**Site area:** 2.46

**Ownership:** Mixed

**Ward:** Larkhall

**Site Description:** The KIBA adjoins the western boundary of the London Borough of Wandsworth and forms part of the larger agglomeration of employment uses which extends across the boundary. The land which sits within the London Borough of Wandsworth is presently in waste management use and identified as Strategic Industrial Land (SIL) in the London Plan. The railway line runs along the western boundary of the site and beyond this, across Portslade Road, is a residential housing estate. The area comprises various commercial and industrial uses including a number of managed industrial estates. The sites and premises within the KIBA have direct access onto Wandsworth Road. Adjoining the area and fronting Wandsworth Road are a number of retail outlets with residential accommodation on the upper floors.

**Existing use(s):** Various industrial, warehouse and business uses.

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** Part of the site falls within the Wandsworth Road Conservation Area (CA 59). There are no listed buildings on the site however to the north are Grade II Listed at No's 372, 374 and 376 Wandsworth Road.

**Traffic and access:** The KIBA is a good site for waste uses although some parts of the site have access issues including safety and obstruction problems with current access from Pensbury Place onto Wandsworth Road. There may be potential for access from Silverthorne Road as laid out in the London Borough of Wandsworth Stewarts Road strategy document.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs in principle and therefore there are no immediate land use conflicts. The area adjoins a major waste facility and therefore presents a good site to locate such uses and could facilitate co-ordinated operations in the future. A buffer between any waste management uses and residential properties may need to be considered depending on the facility/operations proposed particular on sites situated to the east of the KIBA.

The KIBA is located on the boundary of the Nine Elms Strategic Industrial Location (SIL) in the LB of Wandsworth and although not within it, the industrial and business designations are relevant to the ongoing protection and management of the SIL. Additional waste management uses in this location could assist in achieving the strategic aims for the adjoining SIL.

**Potential waste management capacity:** The KIBA contains a mixture of accommodation with a number of railway arches, managed business centres and large industrial units. The make up of the industrial estate means that waste management uses in one or several of the units could potentially be accommodated and could positively contribute to the borough's waste apportionment.

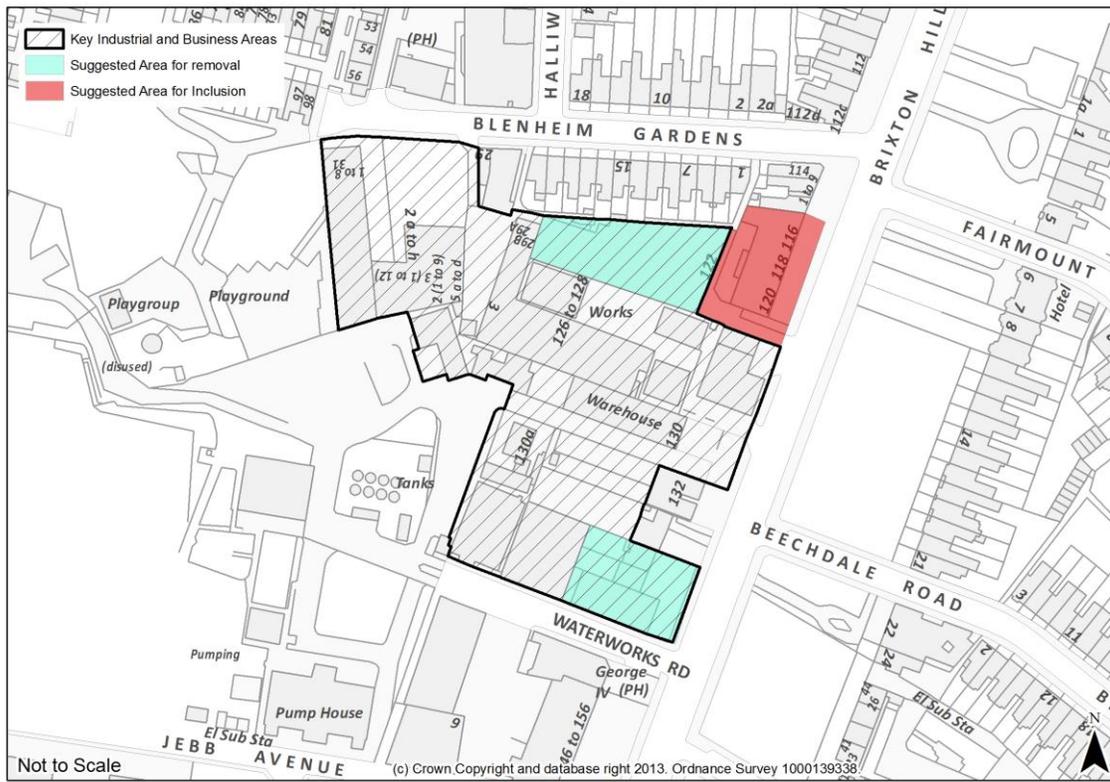
**Deliverability:** The KIBA contains some sites and premises which and could be taken up by a waste management use including 374a Wandsworth Road and 382-394a Wandsworth Road.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** The KIBA is mixed in character with a number of larger industrial and warehouse units, railway arches as well as other vacant sites and premises. Many of these could facilitate waste management operations. Significantly, the KIBA is located adjacent to a SIL which currently has large scale waste operations within it and presents a good opportunity for additional waste uses cluster together. There is good access from the Wandsworth Road.

**Recommendation:** This KIBA is considered to be one of the most appropriate locations for new waste management uses.

## KIBA 26: Waterworks Road



**Site area:** 1.36 ha

**Ownership:** Mixed

**Ward:** Brixton Hill

**Site Description:** The KIBA is situated off Brixton Hill and the surrounding area is mixed with various residential and business uses intertwined. Various small scale retail units are also located along the Brixton Hill frontage. It is proposed that land in residential use be removed from the KIBA.

**Existing use(s):** Various industrial, warehouse and work live office uses

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** Part of the site is covered by the Rush Common Brixton Hill Conservation Area (CA49) and an archaeological priority area.

**Traffic and access:** Brixton Hill forms part of the Transport for London Road Network. Access via other roads within the KIBA is likely to be restricted and would be limited to smaller vehicles. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant transport impacts.

**Potential land use conflict:** Waste management uses are considered appropriate within

KIBAs in principle and therefore there are no immediate land use conflicts. A buffer between any waste management uses and residential properties may need to be considered depending on the facility/operations proposed.

**Potential waste management capacity:** The make up of the KIBA means that the scale of any waste management use in one or several of the units/sites is unlikely to contribute significantly to the borough's waste apportionment.

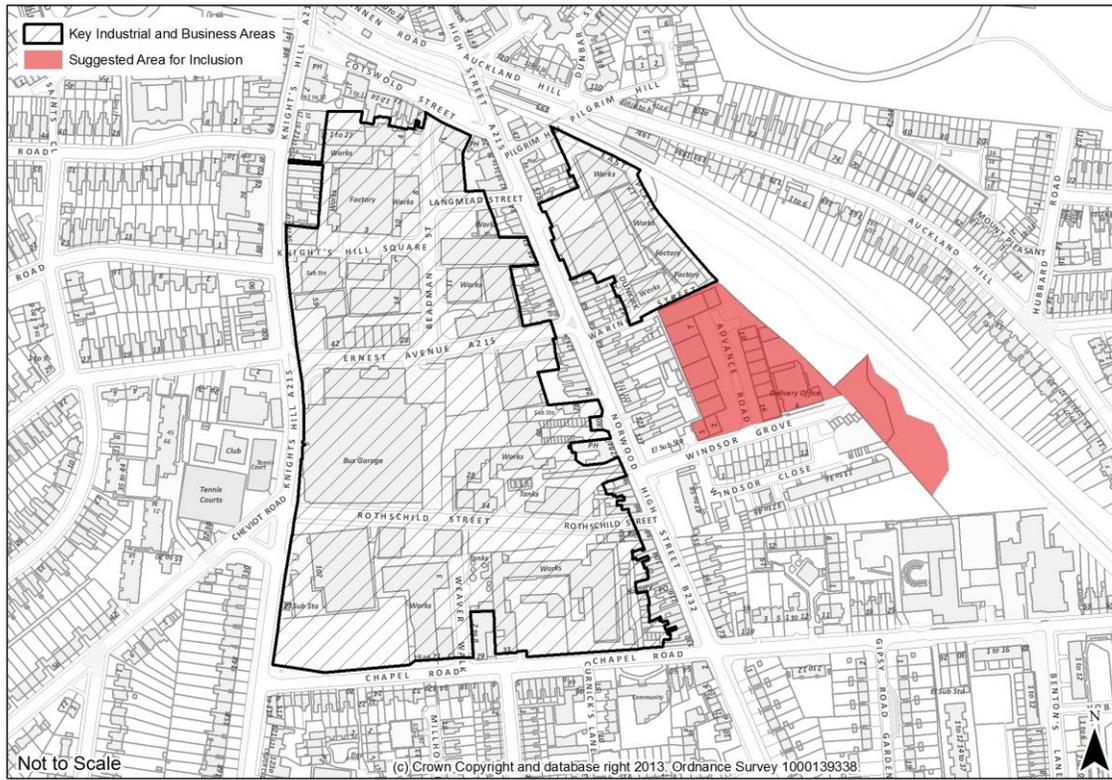
**Deliverability:** The site is located within a KIBA and contains some sites and premises which and could be taken up by a waste management use. However, there are no known proposals for new waste management uses in this KIBA at present.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** The KIBA is mixed in character with a variety of premises and good access; some of these have potential to accommodate smaller scale waste management uses, subject to assessment of impacts on the surrounding area.

**Recommendation:** This KIBA is considered to be one of the most appropriate locations for waste management uses.

## KIBA 27: West Norwood Commercial Area



**Site area:** 8.07 ha

**Ownership:** Mixed

**Ward:** Knight's Hill/Gipsy Hill

**Site Description:** The KIBA is located in the south of the borough and is bounded by Knight's Hill to the west and Chapel Road to the south. The west of the KIBA extends to the railway embankment which runs between West Norwood and Gipsy Hill Station. The central areas of the site are accessed via a one way system, along Norwood High Street, Ernest Avenue and Knight's Hill which connects from/to Norwood Road to the north and Chapel Road and Knight's Hill to the south.

**Existing use(s):** Various industrial, warehouse and business uses. It is proposed to re-designate land off Windsor Grove as part of the KIBA.

**Nature conservation:** The majority of the KIBA and its surrounds do not have any nature conservation constraints. A Site of Borough Nature Conservation Importance is located along part of the eastern boundary of the site (near East Place).

**Historic environment and built heritage:** The KIBA is not situated within a Conservation Areas and there are no listed buildings within the vicinity of the site.

**Traffic and access:** There is access onto a major road from most sites within the KIBA. The access arrangements across the site vary and are generally better along the western areas

of the site than the east. There are some sites within the KIBA that could accommodate larger vehicles but others would only be suitable for small scale operations.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs and therefore there are no immediate land use conflicts. A buffer between any waste management uses and residential properties may need to be considered depending on the facility/operations proposed.

**Potential waste management capacity:** The make up of the KIBA, with a series of larger sites and premises and including vacant premises, means that the scale of any waste management use in one or several of the units could contribute significantly to the borough's waste apportionment.

**Deliverability:** The KIBA contains a number sites and premises of varying size and scale which could be taken up by a waste management use. These include 9 Beadman Street; the Site adjacent to and south of 107 Knight's Hill (former Lambeth College); sites along East Place; and Rothschild Street/Ernest Avenue. However, there are no know proposals for new waste management uses on these sites at present.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** The area contains a wide range of premises and sites that could facilitate various smaller scale waste management operations and this would assist in meeting the London Plan apportionment requirement.

**Recommendation:** This KIBA is considered to be one of the most appropriate locations for new waste management uses.

## KIBA 28: Zennor Road



**Site area:** 3.30 ha

**Ownership:** Mixed

**Ward:** Thornton

**Site Description:** The KIBA is located to the west of the borough and the western boundary adjoins London Borough of Wandsworth. Access to most sites within the KIBA is from Weir Road. The site comprises a number of industrial and warehouse premises including two managed industrial estates. The surrounding area is predominately residential. A primary school is located to the south of the KIBA.

**Existing use(s):** Various industrial, warehouse and business uses

**Nature conservation:** The KIBA and its surrounds do not have any nature conservation constraints.

**Historic environment and built heritage:** The north western corner of the KIBA falls within the La Retraite Conservation Area. There are no listed buildings within the vicinity of the site.

**Traffic and access:** Weir Road is a local distributor road which connects Cavendish Road to the west with Atkins Road to the east. The roads which connect to the site are predominately residential. Cavendish Road is not suitable for large lorries. Small scale waste management uses that involve smaller vans/lorries on this site are unlikely to have significant transport impacts.

**Potential land use conflict:** Waste management uses are considered appropriate within KIBAs in principle and therefore there are no immediate land use conflicts. A buffer between any waste management uses and residential properties and the primary school may need to be considered depending on the facility/operations proposed.

**Potential waste management capacity:** The make up of the KIBA means that the scale of any waste management use in one or several of the units/sites is unlikely to contribute significantly to the borough's waste apportionment.

**Deliverability:** There is potential for smaller scale waste management uses to locate within this KIBA but there are no known proposals at present.

**Decentralised Energy – access to future CHP/CCHP:** There are no proposals known at present.

**Conclusions:** This KIBA consists of a mix of sites and small managed business centres which may provide scope for smaller scale waste management uses.

**Recommendation:** This KIBA is considered to be one of the most appropriate locations for new waste management uses.

Appendix 7 - Outcome of engagement with other authorities on waste

Resp. no.	Name	Comment on Draft Lambeth Local Plan February 2013	Section	Policy	Para.	Council response	Change made to local plan and/or waste evidence base
R1	Port of London Authority (Lucy Owen)	There is no reference to the role that the river could play in transporting waste or how proposals for a new waste management facility should, in line with policy 5.17 of the London Plan, be evaluated against criteria which include “the full transport and environmental impact of all collection, transfer and disposal movements, and in particular, the scope to maximise the use of rail and water transport using the Blue Ribbon Network”.	9	EN7		Accepted.	Insert reference to the criteria in London Plan policy 5.17 into EN7 (b) and paragraph 9.55.
R4	Surrey County Council	The Council believes that additional capacity can be found within the borough’s designated Key Industrial and Business Areas. It is accepted that these are the favoured locations for additional waste management facilities. The most appropriate key industrial and business areas where there is demonstrable landowner/operator interest will therefore need to be allocated in the Plan.	9	EN7		It is not proposed to allocate specific sites for additional waste management uses as there are no specific proposals in the development pipeline and waste operators have said that they prefer a more flexible, area based approach. Instead, the Local Plan identifies broad locations which are most appropriate for new waste uses. These are Lambeth’s Key Industrial and Business Areas, fourteen of which have been identified as particularly appropriate (as explained in the Interim Waste Evidence Base 2013). This approach is considered to be consistent with the requirements of the London Plan.  A reference to the KIBAs considered to be most appropriate for waste management will be added to the supporting text of policy EN7.	Add a reference to the KIBAs considered most appropriate for new waste management uses to the supporting text of EN7.
R4	Surrey County Council	The Surrey Waste Plan 2008 also acknowledges that waste facilities should be suited to industrial sites and in urban areas as the	Interim Waste Evidence Base		Appendix 3	Noted.	Add a reference in the revised waste evidence base document. (See paragraph 8.2 in this report.)

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Resp. no.	Name	Comment on Draft Lambeth Local Plan February 2013	Section	Policy	Para.	Council response	Change made to local plan and/or waste evidence base
		recycling and processing of waste is increasingly being carried out within modern, purpose designed buildings that can be located in these areas.	2013				
R4	Surrey County Council	Appendix 1 and 2 of the Interim Waste Evidence Base (February 2013) show the borough's waste exports to landfill in 2011....The County Council's own analysis of the EA's Waste Data Interrogator 2011 based on waste received indicates that these figures are accurate. A further minor flow of 16 tonnes of C&D waste was also exported from the borough to Epsom Chalk Pit. These quantities of waste movements are considered insignificant although they do still contribute to the significant volume of waste arising in London that are exported for management in Surrey	Interim Waste Evidence Base (Feb 2013)		Appendices 1&2	Noted.	Note these comments; and add a reference to the C&D waste travelling to Epsom Chalk Pit to the final version of the waste evidence base. (See note 1 in Appendix 1 of this report.)
R4	Surrey County Council	It is important to note that Patteson Court Landfill (Redhill Landfill) received over 300,000 tonnes of waste annually from London. Hence the WPA is keen to see London Boroughs allocate sites for alternative waste treatment and recovery facilities as soon as feasibly possible. Patteson Court Landfill site is coming under increasing pressure as non-hazardous landfills continue to close at a rapid rate and WPA's neighbouring Surrey	Interim Waste Evidence Base (Feb 2013)			Noted. Lambeth will forward Surrey County Council's comments to the GLA and the London Regional Technical Advisory Body for their consideration.	Note this point in the revised version of the waste evidence base. (See note 2 in Appendix 1 of this report.)

Resp. no.	Name	Comment on Draft Lambeth Local Plan February 2013	Section	Policy	Para.	Council response	Change made to local plan and/or waste evidence base
		<p>pursue policies discouraging further non-hazardous landfill provision in their emerging waste local plans. Furthermore, the annual capacity of Patteson Court Landfill will fall by around a third from 2015 when a more vigorous movement limit comes into force due to capacity constraints at a nearby junction which are not capable of being overcome.</p> <p>The County Council therefore urges Lambeth and all London boroughs to take immediate steps to plan for the management of waste within their areas in order to reduce pressure on dwindling non-hazardous landfill capacity in surrounding counties such as Surrey.</p>					
R5	Milton Keynes Council	The consultation on the Lambeth Local Plan raises issues around the 'duty to cooperate' in terms of the likely impact on the waste planning in the Milton Keynes area. The Milton Keynes Waste Development Plan (2008) whilst objecting to the level of apportionment in the South East Plan from London does recognise a commitment to work with the London authorities to assess the impact on Milton Keynes.	9	EN7		Lambeth acknowledges the implications of the Duty to Cooperate with regard to waste planning. Milton Keynes' commitment to work with London authorities is noted in the Interim Waste Evidence Base 2013 Appendix 3.	No change.
R5	Milton Keynes Council	Part of the evidence base for Lambeth's waste planning is out of date and therefore presents a misleading position given the	Interim Waste Evidence Base		Table 1	Lambeth's Local Plan must be in general conformity with the London Plan. Lambeth has no choice but to accept the projected waste arising figures and resulting waste	Note the concern in the revised version of the waste evidence base. (See paragraph 2.4 of this report.)

Lambeth Local Plan – Waste Evidence Base November 2013

Resp. no.	Name	Comment on Draft Lambeth Local Plan February 2013	Section	Policy	Para.	Council response	Change made to local plan and/or waste evidence base
		<p>impacts of the recession and downturn since the London plan was approved....</p> <p>Milton Keynes Council has successfully argued in its Core Strategy, that the impacts of the recession and downturn mean that the housing targets in the South East Plan need to be reconsidered. The London Plan should also take account of the wider economy and the slow down in rates of waste generation.</p> <p>Specifically the amount of waste in the apportionment of waste to Lambeth in the London Plan (table 1 in the Interim Waste Evidence Base February 2013) shows a significant level of growth from 2011 to 2031. The total of municipal and commercial industrial waste rise from 195,000 tonnes in 2001 to 313,000 in 2031. The experience in Milton Keynes has been a decline of 13% in the total output of municipal waste from 2007/8 to 2011/12 ....</p>	(February 2013)			<p>apportionment set out in the London Plan.</p> <p>Lambeth will forward Milton Keynes' representation to the GLA for their consideration.</p>	
R5	Milton Keynes Council	The information at tables 2 and 3 of the Waste Evidence Base does confirm a decline in the municipal waste disposal and a significant increase in energy recovery by 2011. Provided this shift from landfill to treatment continues after 2011 the council supports such an	Interim Waste Evidence Base (February 2013)		Tables 2 and 3	Noted.	No change.

Resp. no.	Name	Comment on Draft Lambeth Local Plan February 2013	Section	Policy	Para.	Council response	Change made to local plan and/or waste evidence base
		approach.					
R5	Milton Keynes Council	As for the commercial and industrial waste the Evidence Base refers to the London Plan which forecasts an increase in this category from 151,000 tonnes in 2011 to 162,000 in 2031. This should reflect the decline in municipal waste (rather than the increase set out in the London Plan), which will therefore reduce the pressure for finding more landfill capacity.	Interim Waste Evidence Base (February 2013)		5.8	Lambeth's Local Plan must be in general conformity with the London Plan. Lambeth has no choice but to accept the projected waste arising figures and resulting waste apportionment set out in the London Plan.  Lambeth will forward Milton Keynes' representation to the GLA and the London Regional Technical Advisory Body for their consideration.	Note the concern in the revised version of the waste evidence base. (See paragraph 2.4 of this report.)
R5	Milton Keynes Council	The majority of the level of construction waste is planned to be sent to Hoo Island Medway with a relatively small amount anticipated at Bletchley. However the capacity at Hoo Island is forecast to run out by 2020. It is unclear what the options are for construction waste after that date. The Council does not want an increase in the level of waste exported to Bletchley but this is uncertain given the lack of capacity for Lambeth post 2020.  On construction and demolition waste the London Plan expects an increase in the level of this waste being recycled. However, the Lambeth evidence base goes on to say in 2011 just over 17,000 tonnes of such waste was exported to landfill.	Interim Waste Evidence Base (February 2013)		Appendix 2	The figures shown in the Interim Waste Evidence Base 2013 Appendix 2 simply record what took place in 2011, according to the Environment Agency's waste data interrogator. This does not equate to a plan, or indeed an expectation, that this arrangement should continue. Lambeth wishes more of the construction and demolition waste arising in the borough to be re-used or treated and managed within London, rather than travelling to landfill. This will be made more explicit in the wording of the Local Plan.	Make a clear reference in policy EN7, and a cross-reference under policy EN4 (sustainable design and construction), to the expectation that developers re-use construction and demolition waste or make arrangements for its sustainable management within London. Make clear that the expected fate of CED waste should be set out in documents supporting planning applications and that this will be controlled through conditions on permissions.
R5	Milton Keynes Council	Appendix 1 shows Milton Keynes Council at the Bletchley landfill	Interim Waste		Appendix 1	Lambeth will engage further with Milton Keynes Council on this matter in order to	Record the outcome of further engagement with waste planning

Lambeth Local Plan – Waste Evidence Base November 2013

Resp. no.	Name	Comment on Draft Lambeth Local Plan February 2013	Section	Policy	Para.	Council response	Change made to local plan and/or waste evidence base
	Council	site received 15.88 tonnes from Lambeth. However, 6,870 tonnes were sent to Hoo Island in Medway and this is expected to close in 2020. The evidence base goes on to say the planning policies for the relevant waste planning authorities seek to limit the extent to which waste from London is disposed of in landfill in these areas. Lambeth is therefore in the process of engaging with these authorities to discuss the implications of this. To date no such engagement has occurred.	Evidence Base (February 2013)			discuss a way forward.	authorities outside London in the revised version of the waste evidence base. (See Appendix 7 of this report).
R5	Milton Keynes Council	The council seeks to reserve an objection unless: <ul style="list-style-type: none"> <li>1) engagement does take place between Lambeth and Milton Keynes before the Lambeth Local Plan is submitted</li> <li>2) that engagement leads to an agreement before the Lambeth Local Plan is submitted about the levels of construction waste exported to Milton Keynes and the levels after the Hoo Island facility is closed and</li> <li>3) Lambeth confirms that waste is treated locally before any export to Milton Keynes.</li> </ul>	9	EN7		Noted. 1) Yes, Lambeth will do this. 2) It is hoped that agreement can be reached on this issue. 3) Yes, Lambeth will require this.	Record the outcome of further engagement with waste planning authorities outside London in the revised version of the waste evidence base. (See Appendix 7 of this report.)
R24	Environment Agency	Paragraph 2.84 mentions waste management issues in Lambeth	2		2.84	Noted.	No change.

Lambeth Local Plan – Waste Evidence Base November 2013

Resp. no.	Name	Comment on Draft Lambeth Local Plan February 2013	Section	Policy	Para.	Council response	Change made to local plan and/or waste evidence base
		and rightly points out that as the population increases the quantity of waste produced in the borough will continue to rise.					
R24	Environment Agency	We support Policy EN7 Sustainable Waste Management and Policy Q13 Refuse/recycling storage. As regulators of the waste industry we are aware of the impacts that waste sites and activities can have to local residents who live in close proximity.	9	EN7		Noted.	No change.
R24	Environment Agency	We support Policy EN7 Sustainable Waste Management and Policy Q13 Refuse/recycling storage. As regulators of the waste industry we are aware of the impacts that waste sites and activities can have to local residents who live in close proximity.	10	Q13		Noted.	No change.
R24	Environment Agency	We are pleased to note that the waste sections appear to filter through to other parts of the Lambeth Local Plan. We would like a bit more emphasis on the siting of facilities that may be aimed at moving waste materials up the waste hierarchy i.e. 'upcycling'/resource recovery, to benefit from borough approach to 'green industries' which is mentioned in other parts of the local plan related to employment etc.	9	EN7		Noted.	Add reference to supporting text to EN7
R24	Environment Agency	We support the SA view that the sections of the Lambeth Local	Interim Waste			Noted.	No change.

Lambeth Local Plan – Waste Evidence Base November 2013

Resp. no.	Name	Comment on Draft Lambeth Local Plan February 2013	Section	Policy	Para.	Council response	Change made to local plan and/or waste evidence base
		Plan which address the borough's waste management issues and the supporting evidence documents appear to have been compiled using the best available data and current guidance. All of the major waste streams have been addressed and the issues surrounding mass flows from the borough and the availability of suitable treatment capacity have been addressed, having regard to the amount of materials apportioned to the borough within the London Plan, and the availability or otherwise of capacity outside of the borough.	Evidence Base (February 2013)				
R24	Environment Agency	The plan addresses the needs of the relevant local and national waste management strategies, giving regard to the waste management hierarchy and current guidelines, and these appear to have been referenced in other sections of the document, such as the sustainability appraisal.	9	EN7		Noted.	No change.
R24	Environment Agency	Sites within the borough's KIBAs have been identified and assessed for their suitability for waste facilities. It is noted that changes have been made in the policies regarding KIBAs in order to safeguard them for business/industrial usage which is beneficial to the plan's waste management aspirations.	9	EN7		Noted.	No change.
R24	Environment	Mention is made in policy ED1 of	6	ED1	Para	Noted.	Add a reference to paragraph 6.7.

Resp. no.	Name	Comment on Draft Lambeth Local Plan February 2013	Section	Policy	Para.	Council response	Change made to local plan and/or waste evidence base
	Agency	'green industries' such as recycling and recovery/reuse operations. It would be beneficial if other facilities that move waste up the hierarchy such as those which enhance the recovery of materials and resources from waste streams i.e. the 'upcycling' of materials were also mentioned and included within this definition in order to benefit from the approach to 'green industries' elsewhere in the plan.			6.7		
R24	Environment Agency	Construction and Demolition Waste. We support recycling of waste generated by construction and demolition of development in Lambeth. In accordance with Section 34 of the Environmental Protection Act and the Duty of Care in respect of waste, any waste generated on site is to be stored in a safe and secure manner in order to prevent its escape or its handling by unauthorised persons.....There is an improved Code of Practice to regulate the reuse of excavated materials....	9	EN7		Noted.	Insert the full EA wording into the revised Sustainable Design and Construction SPD, to make clear that the council expects developers to address the statutory requirements and code of practice for construction and demolition waste. Make a cross-reference in the supporting text to EN7 (para 9.58).
R28	Lambeth Food Partnership	Important to specifically mention composting. Following amendments to policy wording proposed:  (a) The Council will contribute to the sustainable management of waste in Lambeth by:	9	EN7		The need to reference support for composting is accepted. The proposed change to EN7 (a) (i) is accepted. However, the other proposed edits to policy wording are not accepted as these would be better dealt with in the supporting text.	Insert proposed addition to EN7(a)(i) plus a reference to support for composting as a form of on-site waste management in paragraph 9.56.  Also include reference to composting as a type of waste management use in the final version of the Waste Evidence Base. (See Table 3 and paragraph 5.7

Resp. no.	Name	Comment on Draft Lambeth Local Plan February 2013	Section	Policy	Para.	Council response	Change made to local plan and/or waste evidence base
		<p>(i) Supporting the approach to drive waste management up the waste hierarchy...and in particular the efficient use of resources, the reuse of materials and resources, <u>composting</u> and the recovery of energy from materials.</p> <p>(iv) Supporting additional sites for waste management for KIBAs and other appropriate locations to provide capacity to meet, over the plan period, the borough's waste apportionment set out in the London Plan. <u>The council is particularly supportive of composting schemes.</u></p> <p>(v) Supporting the provision of an adequate supply of land for operational delivery of the waste collection service, including depots, waste transfer sites <u>and composting.</u></p> <p>(c) On-site waste management facilities, <u>including composting</u>, should be incorporated into all major development proposals unless it is demonstrated that provision is not viable or the location renders the site unsuitable for such facilities.</p>					in this report.)
R33	Kent County Council	Need to improve either or both policies EN4 on sustainable design and construction and EN7 on sustainable waste management to ensure that	9		EN4 & EN7	Accepted.	Make a clear reference in policy EN7, with a cross reference under policy EN4 (sustainable design and construction), to the expectation that developers re-use construction and

Resp. no.	Name	Comment on Draft Lambeth Local Plan February 2013	Section	Policy	Para.	Council response	Change made to local plan and/or waste evidence base
		design and construction take into account sustainable waste management. There needs to be a requirement to incorporate sustainable waste management practices in construction to minimise waste production and to incorporate design measures to enable the occupiers of the development to be able to segregate wastes to facilitate recycling and recovery.					demolition waste or make arrangements for its sustainable management within London. Make clear that the expected fate of C&D waste should be set out in documents supporting planning applications and that this will be controlled through conditions on permissions.  In para 9.56, make a more explicit reference to design measures that enable future occupiers to segregate wastes to facilitate recycling and recovery.
R33	Kent County Council	The issue of Belvedere EfW bottom ash has been examined but no consideration has been given to the air pollution control residues (APCRs) which are hazardous waste. The Allington EfW in Kent is expected to produce 50,000 tpa APCRs from an annual input of 500,000 tpa of waste. Currently all APCRs that arise in Kent go to landfill. As the closest merchant hazardous landfills to London are in Northamptonshire and Gloucestershire, you might need to consult the WPAs for these areas if the Belvedere APCRs also go to landfill.	Interim Waste Evidence Base (February 2013)		Para 5.6	Noted. The APCRs from Belvedere are stored underground in disused salt mines in Cheshire. Information about this will be added to the waste evidence base report .	Update waste evidence base report. (See paragraph 4.3 in this report.)
R33	Kent County Council	Note that the CDE wastes which arise in Lambeth and are landfilled at Margetts Pit bypass a number of inert landfills in Kent on the way to its final disposal.	Interim Waste Evidence Base (February 2013)		Appendix 1	Noted.	Note this point in the final version of the waste evidence base report. (See note 3 in Appendix 1 of this report.)

Lambeth Local Plan – Waste Evidence Base November 2013

Resp. no.	Name	Comment on Draft Lambeth Local Plan February 2013	Section	Policy	Para.	Council response	Change made to local plan and/or waste evidence base
		<p>This disposal does not pose any significant issue for Kent's emerging strategy as the issue which we are trying to address through draft policy CSW11 is how to ensure that the existing permitted quarries, which require backfilling to achieve satisfactory restoration, are actually restored. CSW11 provides a focus on inert residual waste going to quarry restoration when applications for other forms of development which use inert waste are being determined.</p>					
R33	Kent County Council	<p>It is highly likely that the CDE waste containing asbestos, which has arisen in Lambeth and is managed in Kent, is being landfilled in Pinden Quarry in Dartford. I have discovered through interrogating then EA waste data that only limited information is provided on the areas of the arisings of waste entering this site. However, I am aware that the majority of the asbestos waste going to this site does not arise in Kent and that this asbestos landfill is of major importance to London, the South East and the East of England.</p> <p>From KCC's point of view, the continuation of this hazardous landfill is important to maintaining net self-sufficiency in hazardous waste management capacity as Kent exports as much hazardous</p>	Interim Waste Evidence Base (February 2013)		Appendix 2	Noted.	Note this in the final version of the waste evidence base report. (See note 1 in Appendix 2 of this report.)

Lambeth Local Plan – Waste Evidence Base November 2013

Resp. no.	Name	Comment on Draft Lambeth Local Plan February 2013	Section	Policy	Para.	Council response	Change made to local plan and/or waste evidence base
		waste as it imports. Fortunately, there is also a need for this chalk quarry to be extended and this extension will be allocated in both the Minerals and Waste Sites Plans. This should ensure the continuation of this asbestos disposal facility for the life of our plan (up to 2030). So the importation of asbestos waste from Lambeth does not present any adverse issues for the emerging Kent waste strategy.					
R33	Kent County Council	<p>Appendix 3 is correct in its summary of Kent's emerging waste policy. However, I would advise that the programme has slipped by about six months from the published programme and it is our intention to publish a revised scheme.</p> <p>I would also add that our waste strategy is more than just maintaining net self- sufficiency and it tries to bring some reality into the strategy by making allowance to manage some imports in addition to making sufficient provision for Kent's waste arisings. In the calculations to assess any future gaps in the provision of waste facilities an allowance has been made for managing imported waste as follows:</p> <ul style="list-style-type: none"> <li>• 352,000 tpa of CDE waste for landfill or recycling</li> </ul>	Interim Waste Evidence Base (February 2013)		Appendix 3	Noted.	Note this in revised version of the waste evidence base report. (See Appendix 3 of this report.)

Resp. no.	Name	Comment on Draft Lambeth Local Plan February 2013	Section	Policy	Para.	Council response	Change made to local plan and/or waste evidence base
		<ul style="list-style-type: none"> <li>21,259 tpa up to 2017 and 87,000 tpa from 2018 of non-hazardous waste for either landfill or EfW</li> </ul> <p>This can be found by reading the following reports in our evidence base:</p> <ul style="list-style-type: none"> <li>Waste Needs Assessment: addendum to the Needs Assessment Modelling Technical Report 2011</li> <li>TRW8: Assessment of Need for Energy from Waste for Non-Hazardous Waste</li> </ul>					
R114	Oxfordshire County Council	The Interim Waste Evidence Base (February 2013) identifies a small amount of hazardous waste disposed in Oxfordshire in 2011. This was probably sent to the Ardley non-hazardous landfill site in north Oxfordshire which is also licensed to dispose of asbestos. The landfill site has planning permission to operate until 2019.	Interim Waste Evidence Base (February 2013)		Appendix 2	Noted. The waste evidence base document will be updated accordingly.	Update waste evidence base report. (See note 2 in Appendix 2 of this report.)
R114	Oxfordshire County Council	No analysis appears to be given to waste movements from Lambeth in previous years, but we are not aware that there have been any significant waste movements from the borough to Oxfordshire. The county has taken waste from other parts of London for many years and in 2011 disposed of 456,312	Interim Waste Evidence Base (February 2013)			<p>Lambeth has focussed on analysis of data from 2011 as this is the most recent year for which EA data are available.</p> <p>Oxfordshire's desire to reduce the amount of waste from London disposed of in landfills in the county is noted and accepted by Lambeth. Lambeth's Local Plan policies will be strengthened to make clear that the council expects waste arising in the borough to be</p>	Make a clear reference in both policies EN7 (sustainable waste management) and EN4 (sustainable design and construction) to the expectation that developers re-use construction and demolition waste or make arrangements for its sustainable management within London. Make clear that the expected fate of C&D waste should be set out in documents supporting planning

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		<p>tonnes of waste from the capital. Two thirds of this was inert waste, of which the vast majority came from Newham (we assume from the Olympic site). Most of the non-hazardous waste came from West London and was sent to the Sutton Courtenay landfill by rail.</p> <p>There is therefore potential for the movement of waste to Oxfordshire from areas such as Lambeth if adequate provision is not made for management and disposal of waste locally. Existing landfills are reducing and no new landfill areas are being created within and close to London, so the potential for waste to travel to Oxfordshire's landfills is increasing. These too have limited capacity and this would not be a sustainable waste management solution.</p>				<p>managed within London, except in very exceptional circumstances.</p> <p>We also note that, when commenting, OCC add that they should have differentiated between non-hazardous and inert waste movements. The point about no new landfills being created is related to disposal of HIC (non-hazardous) waste. Quarry voids continue to be created to supply primary aggregates and the satisfactory restoration of these sites usually involves inert waste(principally excavation waste) being brought to a site. This is normally in short supply.The landfill policy(W2 and W7) in the OCC (now withdrawn) Core Strategy did not preclude movement of inert waste into Oxfordshire or attempt to set targets for the reduction in such movements.</p>	<p>applications and that this will be controlled through conditions on permissions.</p>
R114	Oxfordshire County Council	The Draft Lambeth Local Plan acknowledges that the London Plan expects the boroughs to become self-sufficient in waste management by 2031, but we would welcome a clearer statement that this is also the local plan's stated aim; and clarification that this applies to all of the waste streams mentioned in the Interim Waste Evidence Base.	9	EN7		Accepted.	Add clarification of these points to the supporting text to EN7 (para 9.50).
R114	Oxfordshire County	Although an amount of land is identified for future waste needs,	Interim Waste		Section 8	This information will be updated as far as possible, drawing in particular on the strategic	Update the waste evidence in light of any additional information available.

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	Council	a clearer indication should be given of the type and scale of facilities needed. This should come from a better analysis of the needs of the commercial and industrial and the construction, demolition and excavation waste streams in particular.	Evidence Base (February 2013)			London wide information made available by the GLA. The Interim Waste Evidence Base reports the outcome of engagement with current waste operators in Lambeth.	(See sections 7 and 8 of this report.)
R114	Oxfordshire County Council	<p>Appendix 3 of the Interim Waste Evidence Base should also refer to the saved waste policies of the Oxfordshire Minerals and Waste Local Plan (1996), which forms part of the current development plan. It should also be noted that the submitted Oxfordshire Minerals and Waste Core Strategy includes a policy on Hazardous Waste (policy W8), and that Policy W5 encourages recycling, composting and food waste treatment facilities (irrespective of the origin of the waste generated).</p> <p>For your information, the examination of the Oxfordshire Minerals and Waste Core Strategy is currently suspended until 31 May 2013 and the timetable beyond that date is not yet clear.</p>	Interim Waste Evidence Base (February 2013)		Appendix 3	<p>Noted.</p> <p>We also note that the Oxfordshire Minerals and Waste Core Strategy was withdrawn on 9 July and that a new plan is being prepared with a view to adoption in December 2015. The policies from the withdrawn Core Strategy (W8 and W5 as referred to here) are now no longer relevant. However, the saved policies of the Minerals and Waste Local Plan 1996 are still part of the development plan and are relevant</p>	Amend the waste evidence base document. (See Appendix 3 of this report.)
R115	GLA	<p>Overall the relevant policies, notably EN7 and the overall objectives, are in line with the relevant London Plan policies.</p> <p>We welcome that Lambeth is:</p>	9	EN7		Noted	No change.

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		<ul style="list-style-type: none"> <li>○ Consulting with out of London boroughs that currently receive their waste</li> <li>○ Discussing how best to meet its apportionment with other London boroughs</li> <li>○ Safeguarding waste management sites and wharves</li> </ul>					
R115	GLA	Lambeth in its Local Plan should identify what document will identify waste sites in the borough for meeting its waste apportionment targets. This is typically set out as part of a Core Strategy or in a separate Waste Development Plan.	9	EN7		All aspects of planning policy for waste are to be included in the Local Plan and not in subsequent DPDs.	No change.
R115	GLA	Section 9.50 and in the Interim Waste Evidence Base 2013; to ensure there is clarity that only waste at waste transfer sites sorted for recycling or composting counts towards meeting the borough's apportionment target. Refer to section 5.75 in the London Plan for what is deemed to be managed in London for the purposes of waste self-sufficiency	9		9.50	Noted.	Insert references into paragraph 9.50 and the revised waste evidence base document (see paragraph 2.6 of this report).
R115	GLA	In line with Policy 5.17 of the London Plan, Lambeth must allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned. In EN7(iv) and the interim Waste Evidence Base 2013 Lambeth say that they will	9	EN7		It is not proposed to allocate specific sites for additional waste management uses as there are no specific proposals for significant new waste facilities in the development pipeline in Lambeth and waste operators have said that they prefer a more flexible, area based approach. Instead, the Local Plan identifies broad locations which are most appropriate for new waste uses. These are Lambeth's Key	Add a reference to the KIBAs considered most appropriate for new waste management uses to the supporting text of EN7.

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		support additional sites but not identify sites.				<p>Industrial and Business Areas, fourteen of which have been identified as particularly appropriate (as explained in the Interim Waste Evidence Base 2013). This approach is considered to be consistent with the requirements of the London Plan.</p> <p>A reference to the KIBAs considered to be most appropriate for waste management will be added to the supporting text of policy EN7.</p>	
R115	GLA	In EN7(b) we would encourage reference to the planning decision criteria in Policy 5.17 'Waste Capacity' of the London Plan.	9	EN7(b)		Accepted.	Insert reference to the criteria in London Plan policy 5.17 into EN7 (b) and paragraph 9.55.