

Objection to 20/01822/EIAFUL (rev 1)

On behalf of:

Norwood Action Group, Norwood Forum, Norwood Planning Assembly,
Station to Station (Business Improvement District)

The proposal to cease apportioned waste handling at Shakespeare Wharf and instead build homes is opposed by the aforementioned groups **on London and Lambeth policy grounds:**

1. Under the 'new' London Plan any proposed alternative use of this "safeguarded" waste site may only be considered if "plan-led", and not if "ad hoc".
2. The failure to provide **any** compensatory apportioned waste capacity whatsoever to compensate for proposed closure of **this** site (Shakespeare Wharf). Compensatory capacity is required by both London and Lambeth policies.
3. Alternatively, the quantum of alleged 'compensatory capacity' is insufficient.
4. Any permission should require an s106 directing that genuine compensatory capacity for Shakespeare Wharf is in prior operation and remains so.
5. In any event, as long as Lambeth continues to have insufficient apportioned waste capacity to meet the mandatory London apportionment, the loss of a safeguarded waste site is contrary to London and Lambeth policies.
6. Alternatively, if it should be determined that the application site is no longer required, under London policy the apportioned waste capacity should first be offered to other boroughs.
7. Waste displaced from Shakespeare Wharf to unknown destinations would result in greater vehicle mileage and pollution than at present, conflicting with policies.

Re 1.

The Publication London Plan December 2020 [*hereafter PLP*] requires ongoing "safeguarding" of the site for waste use. Lambeth has no "plan led process" that leads this application. Instead the application is "ad hoc", therefore it is non-compliant with the PLP, which is due to be adopted in March 2021. ¹

Re 2.

The application makes no attempt to comply with London and Lambeth policies by failing to offer ANY compensatory capacity for the **current** operation at Shakespeare Wharf. ²

[Instead capacity proposed at Windsor Grove, West Norwood, is for waste metal currently handled at a site in the borough of Lewisham. This would entail the unnecessary and undesirable transfer of the entire business and undertakings of Southwark Metals Ltd, currently operating at 158 Trundleys Road, SE8 5JE.]

Re 3.

We alternatively object as the quantum of alleged 'compensatory capacity' falls grossly short of Shakespeare Wharf's "maximum achievable" tonnage. ³ Instead, in error, the applicant's basis is the historic quantum of apportioned waste handled there. We contend:

- As the site could potentially handle waste that is all within the apportioned waste category, the quantum should be based on the whole waste tonnage (both apportioned and non-apportioned) the site can potentially handle. ³

- Regarding that whole tonnage, London policy refers to the capacity of the site over the prior five years of continuous operation, or when non-continuous, the “appropriately assessed” capacity of the site. ⁴ Shakespeare Wharf has not been operated continuously; there was an extended break after Suez (Shukco) ceased operations.
- The question of the calculated capacity has to be established. Lambeth’s current guidance is 60,000 tonnes/ha/year (60kte/ha) ⁵ – as the site is .67ha this calculates to 40kte. In other Lambeth documentation the estimated capacity is 53.6kte (based on 80kte/ha), and the licenced capacity stated as 87.75kte. ⁶
- The potentially enlarged site at Windsor Grove (historically .24ha, potentially .38ha) is at most 55% of the area of Shakespeare Wharf (.67ha). The .24ha is the former car breaker’s site, the .38h is for the application site including railway embankment / SINC.

The Windsor Grove site is about half the size of Shakespeare Wharf. ‘All things being equal’, it is therefore incapable of providing compensatory capacity to match potential Shakespeare Wharf capacity as required to satisfy London and Lambeth policies.

In any event, this application proposes just 35kte at Windsor Grove, less than whichever potential capacity of Shakespeare Wharf is taken as correct: 40kte, 53.6kte or 87.75kte.

Re 4.

We contend that an approval without an s106 obligation requiring compensatory capacity in operation and retained as such would be contrary to London and Lambeth policy.

Compensatory apportioned waste capacity **does not exist** until it is in operation.

We are mindful that not all planning approvals are actioned, built and operated.

The application construction timelines for both Shakespeare Wharf and Windsor Grove are concurrent. Therefore at best, Shakespeare Wharf would be decommissioned at least a year before Windsor Grove could be operational – however, in reality Windsor Grove would then provide **NO** compensatory capacity whatsoever for Shakespeare Wharf (see point 2)

Re 5.

Lambeth has an increasing shortfall in waste capacity through to 2036 and beyond. It equates this to the requirement for an additional >2ha of land in waste handling use. ⁷

Therefore at this time no waste sites can ordinarily be regarded as “surplus” and available for other uses.

Re 6.

The PLP states: *“Boroughs with a surplus of waste sites should offer to share these sites with those boroughs facing a shortfall in capacity before considering site release.”* ⁸ There is no information in the application to indicate that this waste site is surplus to Lambeth waste requirements or has been offered to other boroughs.

Re 7.

There is no information whatsoever provided in the application as to what would happen to the current waste stream handled at Shakespeare Wharf. The proposed loss of that site has implications for vehicle miles and pollution both within the borough of Lambeth, and beyond. The applicant has not addressed this, thus failing to comply with PLP and Lambeth policies. ⁹

It is rational that waste currently comes to Shakespeare Wharf due to a combination of two key factors: *convenience and prices*; clearly convenience (proximity to sources) links with financial considerations. It is therefore also rational to believe that the loss of this safe-guarded waste site will generate significantly more vehicle miles and pollution due to displaced waste consignments finding new destinations at greater distance from source.

'Red' footnote references:

Note – due to the proximity of both 'new' London and Lambeth Plans being adopted and already carrying weight in planning decisions, their relevant policies are referenced below. Most points have equivalence in the current adopted plans.

1. PLP Policy S1 9 - A. At 9.9.2 it amplifies:
"Any proposed release of current waste sites or those identified for future waste management capacity should be part of a plan-led process, rather than done on an ad-hoc basis."
2. PLP Policy S1 9 - C.
3. Also PLP Policy S1 9 - C. At 9.9.2 it adds:
"... based on the maximum achievable throughput of the site proposed to be lost."
Note: "achievable", not "achieved".
4. PLP at 9.9.2 states for calculation of capacity: *"maximum throughput achieved over the last five years should be used; where this is not available, potential capacity of the site should be appropriately assessed."*
5. Draft Revised Lambeth Local Plan January 2020 [DLLP hereafter] - Waste Evidence Base (December 2019) Table 5.1 .
6. DLLP – Interim Waste Evidence Base February 2013.
At Appendix 5 this states estimated capacity at 53,600 tonnes (based on 80kte/ha) and licenced capacity at 87,750 tonnes.
7. DLLP at Policy EN7 para 9.68 states a current apportioned waste capacity shortfall of 87.7kte rising to 94.7kte in 2036, with an equivalence of 2.0ha rising to 2.3ha.
8. PLP Policy SI 8, para 9.8.6
9. PLP Policy SI 1 A and B; T4 A and B; T7 A and B.
DLLP EN4 A; T1 C and F (amplified at paras 8.1 and 8.5); T8 A
Healthy Streets; Vision Zero