

## 7 Environmental Challenges

### Environmental Challenges

#### Introduction

7.0.1 This chapter covers Bromley's planning policy response to the current and future challenges of a range of environmental issues including:

- waste management;
- flood risk management;
- sustainable design and construction; and
- carbon reduction.

#### Waste Management

##### Policy 112

#### Planning for Sustainable Waste Management

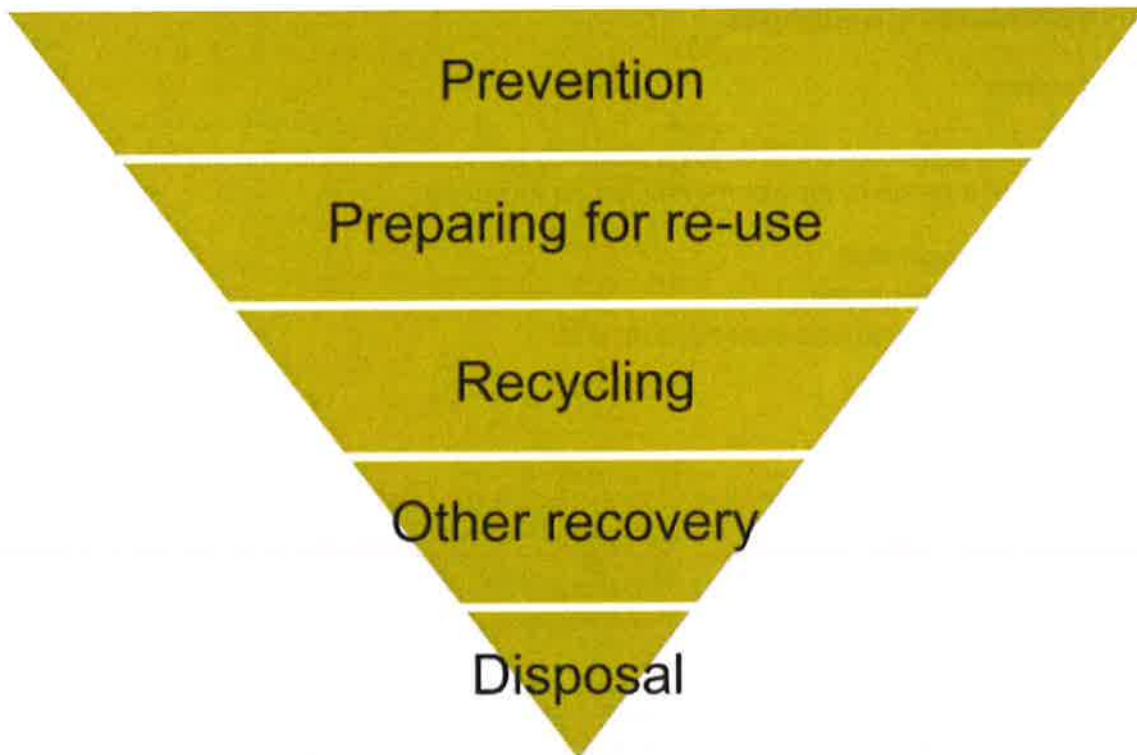
The Council will support sustainable waste management by:

- Implementing the waste hierarchy in its approach to future waste management
- Allocating the strategic waste management sites of Waldo Road, Churchfields and Cookham Road and safeguarding them for waste uses only.
- Working in collaboration with the London Boroughs of Bexley, Greenwich, Southwark, Lewisham and City of London to make optimum use of waste management capacity in the south east London sub region.
- Meeting the London Plan waste apportionment targets.

#### Supporting Text

7.0.2 Both central government and the GLA set out a clear strategy for waste management which involves a key role for local planning authorities. Through their allocation of sites and the application of their policies they are expected to positively influence not only the type and amount of waste that is produced but also its treatment and movement.

7.0.3 The waste hierarchy shows the preferred options for managing waste – the most important solution being to reduce that waste in the first place, the least desirable being disposal of that waste, for example, to landfill.



**7.0.4** The Government sets out its expectations for waste management, in line with the EU Waste Framework Directive, in the Waste Management Plan for England (2013) and National Planning Policy for Waste. Local Planning authorities are expected to take responsibility for driving waste management up the hierarchy, providing a framework for communities to be able to reduce waste and enable more effective recycling and disposal and making sure any facilities are appropriately sited to protect health and the environment.

**7.0.5** In turn, the London Plan 2015 states that the Mayor will work collaboratively with the boroughs, waste authorities, the private sector and others to manage as much of London's waste within London as practicable, managing the equivalent of 100% of London's waste within London by 2026. This includes working towards zero biodegradable waste to landfill by 2026.

**7.0.6** In order to meet the challenging targets, the Mayor expects each borough to allocate enough land and identify facilities to be able to manage a certain amount of waste – the waste apportionment targets – which are set out in the London Plan. Boroughs are required to safeguard existing waste management sites and maximise their potential, consider Strategic Industrial Locations (SILS) and Locally Significant Industrial Sites (LSISs) as potentially appropriate for new facilities and then other suitable brownfield sites. In accordance with national policy, the focus on London is to locate new waste management facilities on previously developed sites. National Planning Policy for Waste states that local planning authorities should first look for suitable sites and areas outside the Green Belt whilst recognising that some types of waste management facility have particular locational needs.

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7.0.7 Within this policy context, Bromley's planning strategy for sustainable waste management is threefold:

- to allocate and safeguard strategic waste management sites - Waldo Road and Churchfields Road reuse and recycling centres and Cookham Road composting facility for waste management use only;
- to collaborate with the other south east boroughs through the South East London Waste Group to make best use of excess waste management capacity; and
- to guide any new waste facilities to the Cray Business Corridor, where they do not negatively impact upon the existing uses and aims of the SIL, and then LSISs.

7.0.8 This approach is considered the most appropriate way for Bromley to meet the apportionment targets in the London Plan and manage existing and new non-strategic waste management facilities in the borough.

### **Strategic Waste Site Allocations**

7.0.9 Waldo Road (see map Appendix 10.10) is a Council run reuse and recycling facility, incorporating a Household Waste recycling centre, a Waste Transfer Station, vehicle repair facilities and a depot area providing a base for the operation of municipal waste collection and disposal activities.

7.0.10 Churchfields Road (see map Appendix 10.10) is a Council run reuse and recycling facility, incorporating a Household Waste recycling centre, a Waste Transfer Station and a depot area providing a base for the operation of municipal waste collection and disposal activities.

7.0.11 Swanley recycling centre, Cookham Rd (see map Appendix 10.10) is an open composting facility, currently run by Tamar Organics. Located in the Green Belt, it received permission in 2012 for an anaerobic digester plant which was supported by the Council with a view to it being used for managing household food waste.

### **Utilising Capacity in the South East of London**

7.0.12 Planning practice guidance to the National Planning Policy for Waste states that there is no expectation that each local planning authority should deal solely with its own waste to meet the requirements of the self-sufficiency and proximity principles of the EU Directive, and it acknowledges that there may be significant economies of scale for local authorities working together. The London Plan allows boroughs to collaborate in meeting their apportionment requirements, stating that they should demonstrate this through the preparation of joint waste DPDs, evidence papers or bilateral agreements.

7.0.13 Bromley is part of the South East London Waste Group comprising - Bexley, Lewisham, Greenwich and Southwark (and the City of London). The group sets out their requirements and capacity in a Technical Paper which demonstrates how targets are to be met through strategic allocations in each borough.

### Policy 113

#### **Waste Management in New Development**

Major development proposals will be required to implement Site Waste Management Plans to reduce waste on site and manage remaining waste sustainably.

New development will be required to include adequate space to support recycling and efficient waste collection.

Integrated waste management in new development will be supported where appropriate.

Although re-use and recycling rates construction, excavation and demolition waste in London are high, the London Plan sets a target of 95% to be recycled by 2020. London Plan policy 5.18 states that boroughs should require developers to produce site waste management plans to arrange for the efficient handling of construction, excavation and demolition waste.

#### **Site Waste Management Plans**

7.0.14 In order to encourage better recycling habits and enable efficient waste collection, allowing adequate space for the sorting and storage of waste in new developments is essential. Guidance is available to architects and developers and applicants will be expected to liaise with the Council's waste services team where there are any difficulties with layouts of schemes.

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### Policy 114

#### **New Waste Management Facilities and Extensions and Alterations to Existing Sites**

New waste management facilities and extensions and/ or alterations to existing waste management facilities must demonstrate that they will not undermine the local waste planning strategy and help the Borough move up the waste hierarchy.

The likely impact of the proposal on the local environment and on amenity will be considered against the development plan as a whole and the specific criteria for waste management facilities set out in the London Plan and national policy. New facilities, extensions and alterations should be well designed and contribute positively to local character as far as possible.

Prospective developers of new waste management facilities will be expected to look to the Strategic Industrial Location in the Cray Business Corridor and then other industrial areas before other previously developed land. New waste facilities in industrial areas will only be acceptable where the proposed use does not impede effective operation of other nearby businesses nor undermine the primary function of the designation.

#### **Supporting Text**

**7.0.15** In Bromley, there is currently a range of small facilities which are licenced to store and process various waste streams. Whilst these facilities are not considered strategic to ensuring the apportionment targets are met, they provide important additional capacity for the management of hazardous waste, commercial and industrial and construction and demolition waste. Where these facilities wish to expand and alter, they should ensure that they are helping to move waste management in a more sustainable direction, that is, up the waste hierarchy.

**7.0.16** The potential impact of any extension and alterations will be carefully considered against the criteria set out in London Plan and national policy, in addition to other relevant policies in the Development Plan.

**7.0.17** There are many locations in Bromley where new waste management facilities would be considered inappropriate, due to amenity considerations, traffic impacts or the existence of protective designations, for example. It is considered that, in line with the London Plan, the most appropriate locations are likely to be industrial areas which include the Strategic Industrial Location of the Cray Valley Business Corridor and potentially some of the smaller Locally Significant Industrial Sites. Where waste management operators are considering new development, they should ensure that all opportunities for locating in industrial areas have been fully investigated before pursuing applications elsewhere.

7.0.18 Criteria for considering the potential impact of the development of waste facilities (existing and new) are currently set out in National Planning Policy for Waste and the London Plan.

7.0.19 The criteria include:

- Protection of water resources
- Land instability
- Visual intrusion
- Nature conservation
- Conserving the historic environment
- Traffic and access
- Air emissions including dust
- Odours
- Vermin and birds
- Noise and vibration
- Litter
- Potential land use conflict

7.0.20 The London Plan sets out additional evaluation criteria in Policy 5.17 including the need to achieve a positive carbon outcome resulting in greenhouse gas savings. Facilities that generate energy from waste need to demonstrate that they will be no more polluting in carbon terms than the energy source being replaced.