

## **STATEMENT OF COMMON GROUND**

### **BETWEEN**

#### **WESTMINSTER CITY COUNCIL**

### **AND**

#### **THE NORTH LONDON BOROUGHs**

This Statement of Common Ground has been prepared to identify areas of agreement between Westminster City Council and the North London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. The Statement of Common Ground is on matters relating to the North London Borough's representations on the waste policy in Westminster's City Plan 2019-2040 to assist the Inspector during the examination of the City Plan.

#### **The North London Boroughs' representations**

The North London Boroughs' representations relate to Policy 38: Waste Management, although they were made during the first round of Regulation 19 in December 2018 when waste fell under Policy 34: Managing local environmental effects. These same comments were re-submitted during the second Regulation 19 consultation in July 2019.

The North London Boroughs' representations are set out in full in Appendix A. In particular the representations focus on the waste planning responsibility to plan for seven waste streams and the clarity of the supporting text.

#### **Westminster's Response**

Westminster has prepared a new Waste Evidence Base (March 2020) to support the City Plan waste policy. This includes analysis of the waste arising in Westminster, waste capacity needs over the plan period, and how those needs will be met.

Westminster has reached an agreement with the London Borough of Bexley for them to provide the capacity to manage Westminster's total waste management apportionment. The agreement is set out in a signed statement of common ground (see Appendix C of the Waste Evidence Base). Both parties have agreed that Bexley will take sole responsibility for Westminster's apportionment target and use part of the surplus waste management capacity within Bexley to provide the capacity to meet Westminster's apportionment target as set out in the London Plan.

Table 6.10 of the Waste Evidence Base sets out progress on agreeing statements of common ground on movements of waste. No significant barriers to the continuation of Westminster's waste exports have been identified, however the closure of landfill sites during the plan period is a key issue, not just for Westminster, but for many London

Boroughs who export waste. Where a landfill site is due to close during the City Plan period, parties have agreed that the destination of waste is largely dependent on market forces and exports will continue to go to the most suitable facility. Therefore it is not possible to identify a specific alternative landfill site or sites where Westminster's waste will go after the closure of a landfill site. Parties have agreed that landfill void space in the wider south east represents sufficient opportunity for the market to find an alternative destination for similar amounts of waste currently exported from Westminster to the landfill site in question. The full text of agreed and draft SoCG can be found in Appendix G.

The Waste Evidence Base recommends additions to Policy 38: Waste Management and supporting text (section 9). These will be considered along with any questions and recommendations from the Inspector during the Examination in Public. Changes to the policy and supporting text will then be made and consulted on as main modifications.

### **Areas of Agreement**

Both parties agree that the Waste Evidence Base (March 2020) provides an appropriate evidence base in line with the National Planning Policy for Waste for planning for waste in Westminster.

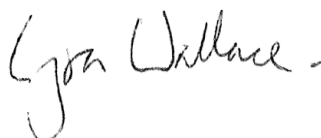
Both parties agree that the proposed additions to Policy 38: Waste Management set out in section 9 of the Waste Evidence Base should be recommended to the Inspector as a viable way for Westminster to fulfil its responsibilities for planning for waste under the National Planning Policy for Waste and the London Plan.

**Signed on behalf of the North London  
Boroughs**



Archie Onslow  
Programme Manager, North London Waste  
Plan  
Date:

**Signed on behalf of Westminster City  
Council**



Name: Ezra Wallace  
Position: Director of Policy & Projects  
City of Westminster  
Date:

## **Appendix A: Representations from the North London Boroughs**

1. There is more than the 180,000 tonnes of waste produced in Westminster each year asserted in para 34.9. The London Plan (2017) projects 722,000 tonnes of household and commercial and industrial waste arisings in Westminster in 2021 rising to 750,000 tonnes in 2041.
2. There is no mention of the construction, demolition and excavation waste produced in Westminster. There are no evidence base documents relating to waste arisings in Westminster.
3. Under the National Planning Policy Framework and the National Planning Policy for Waste, planning authorities should plan for seven waste streams. See Planning Practice Guidance Paragraph: 013 Reference ID: 28-013-20141016. The policy does not meet this requirement.
4. The policy does not show how Westminster is planning to meet its apportionment under the London Plan.
5. In 34.9 the mention of the Technical Waste Guidance is in relation to “specialist waste disposal” facilities. Presumably this is reference to part G of the policy because of a shared reference to food and drink. There is no reference as to how those promoting the major developments are expected to enact part F of the policy in relation to “on-site recycling and composting management facilities”. Clearer use of terminology would also help.
6. It is not clear what type of guidance will be available to applicants in the Municipal Waste Management Strategy which are usually strategy documents for the waste collection authority rather than planning guidance documents.
7. What is an “easy to use waste streaming facility” and where can these be found in Westminster?
8. What are the means by which waste will be reduced in Westminster (as in para 34.10)?