

CITY PLAN 2019 – 2040

WASTE

EVIDENCE

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Executive summary

Westminster City Council City Plan 2019-2040 sets out an ambitious vision for the city. As Westminster's primary planning document, it will include a framework for how our waste management can be most effectively managed. The evidence base contained in this report serves to analyse trends and identify opportunities to support these plans.

Like all local authorities, Westminster's waste management is governed by European, national and local policy. The overarching policy ambition is clear; to work towards more sustainable and effective waste management. Waste prevention sits at the top of our waste hierarchy; at the bottom is disposal to landfill which should be a last resort.

The objectives of the Government's emerging Resources and Waste Strategy, the National Policy Planning for Waste and the Waste Management Plan for England aim to achieve a shift to a circular economy to reduce demand on raw minerals and resources to limit environmental damage and climate change. The draft London Plan reflects this objective through its aspiration for 100% of waste to be managed within London by 2026. This has seen the council working towards zero biodegradable or recycle bale waste to landfill. In 2016-17 less than 2% of municipal waste was sent to landfill compared to 13.5% in 2010-11. This demonstrates the council is achieving the objectives set out in the waste hierarchy.

The draft London Plan apportions 188ktpa of Local Authority Collected Waste, LACW, (household waste and commercial and industrial similar in nature to household waste), to the council by 2021. However, the council has been managing a rolling tonnage of just below 195ktpa for several years already¹.

Unlike other local authorities, the council has no strategic waste management facilities of its own and therefore does not manage its waste within its own boundaries. A sieve analysis, based on the site criteria laid out in the National Planning Policy for Waste, concluded that there is no capacity for waste management facilities in Westminster. In lieu of such sites, the National Planning Policy for Waste and associated guidance and Waste Management Plan for England along with the draft London Plan states local authorities must co-operate in the strategic management of waste and to manage their apportionment. As yet, the council has not formally pooled its apportionment with any London boroughs but has begun discussions to explore opportunities to do so with the South East London Joint Waste Planning Group following responses received from all the waste planning authorities in London as part of its

¹ Waste Data Flow, DEFRA

Duty to Co-operate. This collaboration will also be informed by a technical waste data study and the update of the South East London Joint Technical Waste paper.

In terms of commercial waste, the DEFRA survey in 2009 estimated that of the 527 tonnes generated and collected by various parties throughout the borough, half was sent for recycling or composting, whilst around a third was sent to landfill. However, the survey projected that by 2020 there would be a 70% increase in recycling and composting would see commercial waste sent to landfill drop to around 327 tonnes, approx 40% drop².

Although construction, demolition and excavation is not as widely monitored as some waste streams, large infrastructure schemes such as Crossrail have been significant contributors of waste, and these spikes are likely to continue.

Overall, Westminster is generally performing well across its waste streams. Waste is increasingly being driven up the waste hierarchy due to the rise of recycling and re-use, resulting in a reduction of waste going to landfill. The council will continue to engage with waste planning authorities on strategic waste management issues.

² Waste Data Interrogator, DEFRA

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1 Introduction and Policy context

1.1 Purpose of this document

This document supports Westminster's City Plan waste policies and demonstrates how waste management has been considered. It analyses trends and issues regarding different waste streams and seeks to identify future opportunities to manage waste in the city both at a high-level as stipulated in the NPPW and Waste Plan for England and at the local level as per the draft London Plan and its apportionment and net self-sufficiency targets.

1.2 European Revised Waste Framework Directive

The overarching European Union (EU) legislation for waste is set out in the revised Waste Framework Directive (2008/98/EC), which is implemented by the Waste (England and Wales) (Amended) Regulations 2012. It sets out the basic concepts and definitions related to waste management. This includes the requirement to follow the waste hierarchy, with prevention at the top and disposal of waste as last resort.

1.3 National policy

1.3.1 Emerging Resource and Waste Strategy

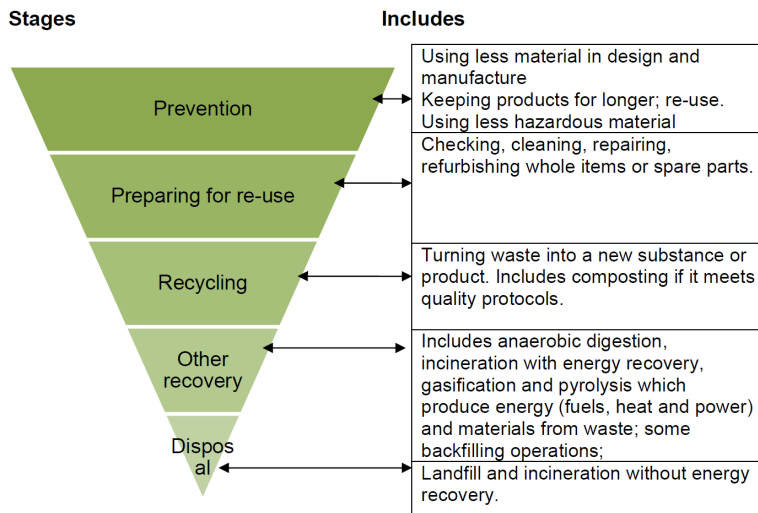
This strategy sets out how the Government plans to double resource productivity and eliminate avoidable waste of all kinds (including plastic waste) by 2050. Its strategy sets out how it will:

- preserve our stock of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy
- minimise the damage caused to our natural environment by reducing and managing waste safely and carefully
- deal with waste crime

1.3.2 Waste Management Plan for England

The Waste Management Plan for England (2013) sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management. It seeks to achieve this by driving waste management up the waste hierarchy, making sure waste management is considered alongside other spatial planning concerns, amongst other measures.

Figure 1 Waste hierarchy



1.3.3 National Planning Policy for Waste

The National Planning Policy for Waste (NPPW) was established in 2014 and sets out detailed waste planning policies. This includes requirements for the evidence base of Local Plans and for the identification of suitable sites and areas. The NPPW states that Waste Planning Authorities should prepare Local Plans which identify sufficient opportunities to meet the identified waste needs of their area. The NPPW also sets out the requirement to work jointly with other planning authorities and requires boroughs to have regard to the waste apportionments set out in the London Plan. Regional policy

1.4 The London Plan

Waste Planning Authorities in London should have regard to their apportionments set out in the London Plan when preparing their Local Plans. The London Plan sets out that boroughs should provide sufficient capacity to manage the tonnages of waste apportioned in the plan. The tables below show the apportionments for Westminster in the current London Plan (March 2016) and in the submitted Draft London Plan (November 2017).

Table 1 London Plan (March 2016) waste apportionment for Westminster (thousand tonnes per annum)

	2016	2021	2026	2031	2036
HH	34	41	50	52	53
CI	52	58	69	70	70
Total	86	99	119	121	124

Table 2 Draft London Plan (November 2017) waste apportionment for Westminster (thousand tonnes per annum)

	2021	2041
HH & CI	188	199

The London Plan also contains targets for recycling/composting of different waste streams. The Mayor aims to manage the equivalent of 100% of London’s waste within London by 2026 including meeting or exceeding the recycling of municipal waste by 65 per cent by 2030.

1.5 Local policy and strategies

1.5.1 Westminster Municipal Waste Management Strategy

The Municipal Waste Strategy (2014) sets out how municipal waste will be managed between 2016-2031. This waste constitutes household waste collected by the council's waste collection contractors plus council collections of commercial and industrial waste similar in nature to household waste.

1.5.2 Reduction and Recycling Plan

The City Council's Reduction and Recycling Plan 2018-2022 (RRP) details the council's approach to increasing the scale and performance of recycling services in the city, a key priority for the council, and ensures the trend of rising recycling rates in Westminster continues. The plan introduces household food waste collections for the first time, the transition to a ULEZ-complaint waste collection fleet and working with BIDS on waste consolidation schemes among other initiatives.

1.5.3 Code of Construction Practice – Site Waste Management Plan

The council requires works are carried out in such a way that as far as is reasonably practicable the amount of spoil and waste (including waste water draining into groundwater, production waters and run-off) to be disposed of is minimised, and that any waste arising from the site is properly categorised and dealt with in accordance with the waste hierarchy and relevant legislation and guidance.

The Government revoked the Site Waste Management Plan Regulations 2008 on 1st December 2013. These required a site waste management plan (SWMP) to be produced for construction projects with a cost greater than £300,000 excluding VAT (this includes all planning, design, management or other work involved in a project until the end of the construction phase). The aim was to reduce the amount of waste produced on construction sites and to prevent fly-tipping.

The City Council promotes efficient resource management including waste minimisation, reuse and recycling. The council will therefore continue to require production of an SWMP for all construction and demolition projects with a cost greater than £300,000. A SWMP will also be required for all basement developments. The SWMP should form a part of the Site Environment Management Plan.

1.5.4 Resource and Waste Storage Design Guide

The council wishes to achieve 65% recycling target of municipal waste by 2030. This means household and commercial waste must be separated and sorted at source before collection. This is to prevent contamination of each waste stream which is tested on arrival at its appropriate management facility where it is tested for contamination and re-directed to incineration or landfill if it is above legislated limits. This design guide provides measures to ensure on-site sorting in new developments and its adherence forms part of new planning applications.

1.5.5 Westminster City Plan

The City Plan is Westminster's primary planning policy document. It is being revised to update current City Plan and Unitary Development Plan policies and bring them

together into a single Local Plan in compliance with the NPPF, Feb 2019, and the new London Plan 2019. The Plan seeks to provide for a healthier city so and is driven by the principles of sustainability to achieve greener living. This includes moving the city's waste up the hierarchy – increasing recycling, reuse and reduction rates to support the shift to the circular economy and making London net self-sufficient in waste management as per the aspiration of the draft London Plan.

2 Existing waste management

2.1 Introduction

There are two key issues for the council to consider when formulating its waste policies; to comply with the national policy direction on waste and be mindful of associated guidance and to comply with the London Plan. The council's local waste policies are tested for compliance against these national and sub-national policies.

2.2 Compliance with national legislation and guidance

The emerging government's strategy towards a circular economy is supported by the NPPW and associated guidance which states that the council's consideration in planning for waste is to "identify sufficient opportunities to meet the identified needs of their area for the management of waste streams". In order to understand what these opportunities might need to be, the council needs to understand the amount and nature of waste arising for the seven waste streams as stipulated within the NPPW:

- Municipal/household
- Commercial/industrial
- Construction/demolition
- Low Level Radioactive
- Agricultural
- Hazardous
- Waste water

The following sections analyse the different waste streams generated in Westminster currently and how they being managed. This analysis is supported with data from DEFRA's Waste Data Interrogator.

2.2.1 Municipal Solid Waste

The EU's Landfill Directive defines municipal waste as both household waste and that from other sources similar in nature and composition. It also includes a significant proportion of waste generated by businesses and not collected by Local Authorities. This section considers all municipal waste generated in the borough collectively – local authority and private collected waste – as measured via DEFRA's Waste Data Interrogator which does not separate out the two sets in its stats. Section 2.3 will consider Local Authority Collected Waste in isolation.

Waste generated in Westminster is being driven up the waste hierarchy, significantly reducing MSW being sent to landfill from 33% to 3% in 2012/13. The table below shows how MSW was treated in recent years, as per the Environment Agency's Waste Data Interrogator.

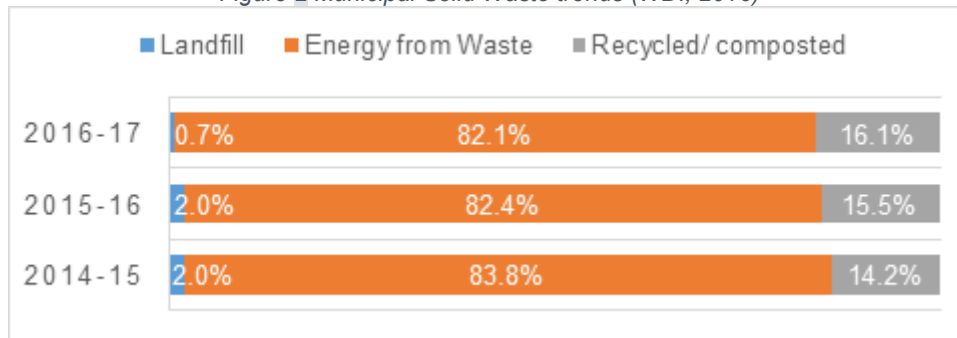
Table 3 Municipal Solid Waste by tonnes and percentages

	2014-15		2015-16		2016-17	
	tonnes	%	Tonnes	%	tonnes	%
Landfill	3772	2.0%	3976	2.0%	1303	0.7%
Energy from Waste	158087	83.8%	160638	82.4%	158451	82.1%

Recycled/ composted	26763	14.2%	30232	15.5%	31029	16.1%
Other	20	0.0%	21	0.0%	17	0.0%
Total	188643	100%	194867	100%	193100	100%

There has been a decline in MSW sent to landfill, which accounts for less than 1% of the total MSW in 2016-17. Recycling and composting has steadily increased, accounting for 16%. The majority of MSW remains being sent to Energy from Waste at 82%. This is some way off the London Plan’s target of 65% of municipal waste recycled. The total tonnes collected have slightly decreased over 2016-17 following a strong increase the year before.

Figure 2 Municipal Solid Waste trends (WDI, 2016)



2.2.1 Commercial and industrial waste

The most recent survey of commercial and industrial (C&I) waste arising took place in 2009³. This survey estimated that a total of 527,000 tonnes of C&I waste was produced in Westminster. Half of this was recycled or composted, whilst around a third was sent to landfill.

Table 3a Commercial and Industrial Waste in 2009 (Defra, 2011)

	Tonnage	Percentage
Recycled / composted	288,000	50%
Incineration / other treatment	103,000	18%
Landfill	181,000	32%
Total	572,000	100%

The survey projected that in 2020 the total tonnage of C&I waste will go down to 327,000 tonnes. Significantly less C&I waste was projected to be sent to landfill, with recycling and composting increasing to 70%. Incineration and other treatment was projected to stay around 19% in 2020.

Table 4 Projected Commercial and Industrial Waste 2020 (Defra, 2011)

	Tonnage	Percentage
Recycled / composted	139,000	70%
Incineration / other treatment	118,000	19%

³ DEFRA: Commercial and Industrial Waste Survey 2009 Final Report, 2011

Landfill	70,000	11%
Total	327,000	100%

2.2.2 Construction, demolition and excavation waste

Construction, demolition and excavation (CD&E) is not as widely monitored as some other waste streams. The Environment Agency's Waste Data Interrogator provides the best available data, despite its shortcomings in potential double counting and not covering waste streams treated under exemptions.

The Waste Data Interrogator shows that over 2015/16, 378.303 tonnes of CD&E waste was produced in Westminster. The London Borough of Ealing (West London Waste Authority) is with 61% the major receiver of CD&E waste from Westminster, from where it is transferred to other locations.

The amount of CD&E waste generated is heavily dependent on ongoing and planned construction projects. Significant contributors of waste in recent years have been development in the Victoria area (Nova, Zig Zag, Kings Gate), Middlesex hospital site, Newman Street sorting office site and Paddington Central, and Crossrail and its related redevelopment sites (Hanover Sq, Dean Street, TCR, Paddington). Crossrail 2 and other potential major infrastructure schemes could result in a spike in CD&E waste in Westminster.

2.2.3 Hazardous wastes

Hazardous waste arises as part of other waste producers including households, commerce and construction. The Environment Agency's Waste Data Interrogator states that in 2015/16, 506 tonnes of hazardous waste were generated in Westminster.

Table 5 Hazardous waste (WDI, 2014/15/16)

2013/2014	2014/2015	2015/2016
412	345	506

2.2.4 Wastewater and sewage sludge

Thames Water manages sewerage infrastructure in London and is responsible for wastewater and sewage sludge treatment. Westminster's wastewater is treated at Beckton Waste Water Treatment Plant (WWTP) in the London Borough of Newham (East London Waste Authority). This facility also serves other London Boroughs north of the Thames, serving an estimated 3.6 million customers. Sewage sludge from the treatment process, around 120,000 tonnes per annum is treated on-site in an EFW facility which converts it into power which is used to run the WWTP.

Waste water from Westminster flows via the local sewer network into one of 3 major tunnels that convey it to Beckton for treatment. The system 6 Combined Sewer Overflow points, CSOs, along the Thames in Westminster which carry both waste water from homes and businesses and rainfall when the main sewer reaches capacity. The Thames Tideway Tunnel is currently under construction to reduce CSO spills into the river by capturing spills and storing them until they can be treated at Beckton. Thames Water is not envisaging any further investment to accommodate

for new development. Thames Water does not have waste water volume data available for individual local authorities.

2.2.5 Low level radioactive waste

Up-to-date information on radioactive waste and materials in stock and estimated to arise in future are set out in the 2016 United Kingdom Radioactive Waste & Materials Inventory. This shows that there are no sites or facilities known to treat radioactive waste in Westminster.

Most radioactive waste produced by minor waste producers are not reported in the abovementioned inventory as it is either low volumes of low level radioactive waste or low volume very low level radioactive waste that is deposited within the MSW and C&I waste streams.

2.2.6 Agricultural waste

According to the Environment Agency's Waste Data Interrogator, 2,716 tonnes of agricultural and food processing wastes generated in Westminster were treated through composting in the Royal Parks within the city in 2016. In addition, 872 tonnes were imported from other London boroughs (including Camden) and treated the same way.

2.2.7 Cross boundary movement of waste

DEFRA's Waste Data Interrogator (WDI) provides data on the movements of waste between waste planning authority areas. The data is based on submitted waste returns from sites operating under waste management licenses. Some facilities are exempt from licencing and therefore do not have to submit returns so the picture provided by the WDI may be partial in some cases.

Westminster is a net exporter of waste. In addition to the 2716 tonnes of waste being produced and treated in Westminster, a total of 872 tonnes of waste was imported from other London Boroughs. This was primarily agricultural waste treated via composting on the Royal Parks.

The table below shows, the waste arisings for household and commercial and industrial waste generated within Westminster and moving across London.

Table 6 Exports for household, commercial and industrial (HIC) and Construction, Demolition and Excavation (CDE) waste tonnages from Westminster to other London boroughs

Destination	Type of waste	2014	2015	2016	2017
North London Boroughs	HIC	90	19	52	44
	CDE	20,196	13,997	9,625	10,291
East London Boroughs	HIC	18,208	74	59	113
	CDE	17,939	32,517	61,357	27,116
South London Boroughs	HIC	0	0	0	0
	CDE	5,911	7,925	4,730	3,860
West London Boroughs	HIC	0	0	0	12
	CDE	48,179	115,238	247,922	197,551
Greenwich	CDE	5,548	11,909	16,405	6,258
Southwark	HIC	1,866	0	0	9,772
Wandsworth	HIC	1,499	5,810	3,587	0

WDI 2019, DEFRA

A total of 60 waste planning authorities have imported waste from Westminster over the period 2013/2014 to 2015/2016. Appendix A provides a list of waste planning authorities that received waste from Westminster over this period. The amount of waste fluctuates each year so data is shown for the last three monitoring periods to provide a comprehensive and robust picture of cross boundary movements of waste.

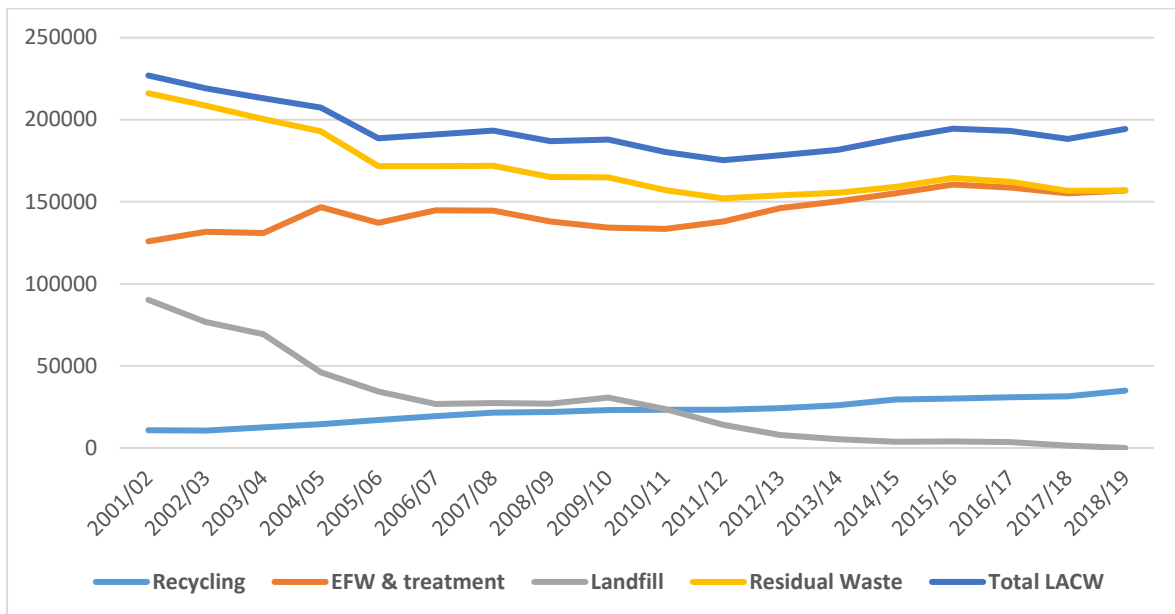
The greatest proportion is shipped to the London Borough of Ealing (36%), followed by Kent County Council (13%). The London Borough of Newham (10%) and Thurrock Council (10%) also receive notable amounts of waste from Westminster.

In terms of hazardous waste, Essex County Council (28%), the London Borough of Newham (24%) and Hertfordshire County Council (20%) receive a significant proportion of waste. A complete overview is provided in Appendix B.

2.3 Local Authority Collected Waste and the waste hierarchy

Local Authority Collected Waste, LACW, is made up of household waste collected by the council plus any commercial and industrial waste it collects which is similar in nature to household waste, in the council's case predominately street cleansing around visitor attractions and areas of employment. The Waste Data Flow data for the council's LACW shows the waste arisings collected and managed by the borough over the last 20 years.

Figure 2 Destinations of WCC LACW '01-'19



Waste Data Flow, DEFRA

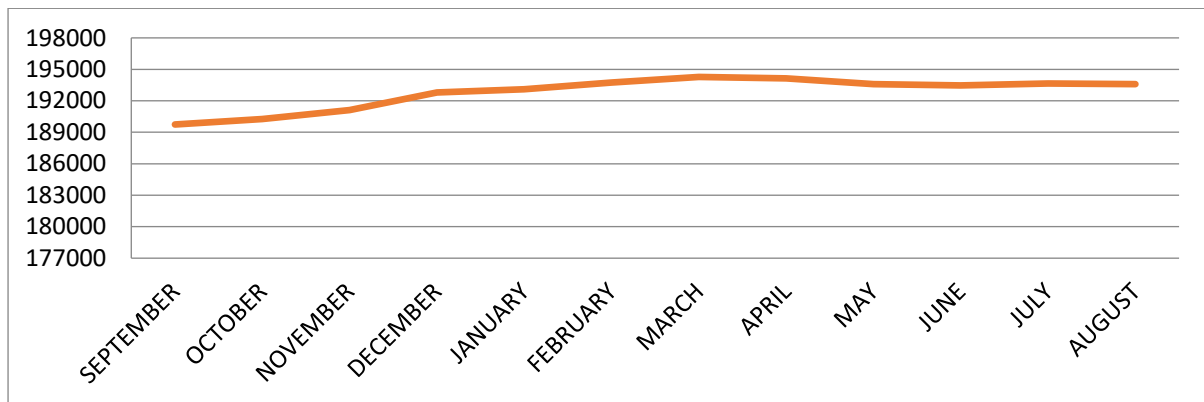
The data shows that waste collected by the council has averaged 187ktpa since 2005 (see App G for raw data), a period which has seen fluctuations in economic growth, meaning that the council's effort to encourage waste reduction are effective in the face of overall economic growth and associated increases in household and visitor consumption and business generation. In publishing its Recycling and Waste

Storage Design Guide, the council has ensured that developers make provision for on-site waste separation and recycling for the various functions and operations of the developments they build. This in turn, means there is less waste contamination when the waste is collected by the council and tested at recycling plants, enabling it to go through the sorting and bulking process rather than be sent to incineration or landfill.

The council contracts its waste collection and disposal services via Veolia. This means its waste is processed at sites in South East London. Material to be recycled is sent to the Southwark Integrated Waste Management Facility, material sent for treatment and energy from waste is sent to the South east London Combined Heat and Power facility adjacent but over the borough boundary in Lewisham, material for aggregate is sent to Day Aggregates in Greenwich while small amounts of waste to be managed through other means are sent to Hammersmith and Fulham (appliances) and areas in Sittingbourne (WEEE and papermilling)⁴.

The rolling tonnage of LACW for the last 12 months is shown below.

Figure 3 Rolling tonnage of LACW (last 12 months)



Waste Data Flow, 2019

2.4 Supporting Council Plans and Guidance

2.4.1 Waste Reduction and Recycling Strategies

The council's Municipal Waste Management Strategy 2016-2031 aims to achieve a series of objectives and associated targets, aligned with the Waste Management Plan for England, to increase recycling rates and promote a shift towards the circular economy. It is a very comprehensive framework which analyses growth in the borough and the requirements of a resource management and waste collection service needed to meet these objectives. It also provides an understanding the waste contracts function and the role they play in supporting the council's objectives.

Since this strategy was drawn up, developments in climate change and environmental protection have moved apace and in response to this the Government is now consulting on its emerging Resource and Waste Strategy⁵ which seeks to achieve a step-change in moving towards a circular economy at a much faster rate.

⁴ <https://cleanstreets.westminster.gov.uk/where-your-waste-goes/>

⁵ <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>

In response to this at the local level, the council has recently declared a climate emergency⁶ and has submitted its draft Reduction and Recycling Plan⁷ to the Deputy-Mayor for the Environment for consideration as part of the London Environment Strategy. The Plan consists of updated actions and milestones and covers four areas; maximising recycling, reducing waste, reducing environmental impact and maximising the use of local waste sites.

2.4.2 Development Management guidance

The council has in place construction codes and design guides to ensure any new development in the city achieves maximum on-site recycling and waste reduction throughout the full life-cycle of its duration from demolition to occupation and onwards.

Due to its position as the centre of the engine of growth for the UK economy, the city has an extremely high rate of development and re-development and as such generates very significant amounts of construction, demolition and excavation (C,D,E) waste. In compliance with the NPPW, the council works with developers to ensure as much of this as is practicably possible is re-used on-site and any remainder will continue on for beneficial use such as the construction of flood and coastal defences and high-quality aggregates among other re-uses. This is encapsulated in the requirements for a Site Waste Management Plan⁸ as an integral part of the Site Environment Management Plan with the council's Code of Construction Practice⁹. This Plan serves to make the development and construction industry accountable for the CDE and other wastes generated during the demolition of disused buildings, excavation and construction of new development.

The Government revoked the Site Waste Management Plan Regulations 2008 requiring a site waste management plan (SWMP) for construction projects costing greater than £300,000 (exc. VAT). However, given the very significant amounts of construction and associated CDE waste generated in the borough, the Council continues to require production of an SWMP such projects and for all basement developments as specified in its CoCP which includes management of CDE waste, both through on-site recycling and re-use and on-site waste processing prior to disposal.

The council also stipulates conditions for the planning of waste within the development once it is occupied. In May 2019, WCC published its guidance "Recycling and Waste Storage Requirements"¹⁰ which seeks to ensure future developments comply with the principles of the Government's emerging Resources and Waste Strategy to move waste up the hierarchy by ensuring less waste is contaminated and sent to incineration by providing better on-site waste sorting and separation facilities prior to council collection to increase recycling and re-purposing rates. It also seeks to ensure commercial waste management facilities are delivered where appropriate within developments to be compacted and baled prior to

⁶ <https://www.westminster.gov.uk/westminster-declares-climate-emergency>

⁷ Draft Reduction and Recycling Plan, Cove Letter, July 2019

⁸ <http://www.wrap.org.uk/sites/files/wrap/SWMP%20Template%20workbook%20v41.pdf>

⁹ <https://www.westminster.gov.uk/code-construction-practice>

¹⁰ <https://www.westminster.gov.uk/waste-storage-planning-advice>

collection. This includes access to these by other developments/businesses if they could serve a wider catchment than the immediate development itself.

2.5 Summary

In summary, the policies, strategies, guidance and data above have all informed the foundation upon which the council's waste policies are built. They give shape and overall direction to policy formulation and serve as supporting evidence to the final policy. The final policy seeks to consolidate this position and plan for its success going forward.

3 Future waste management

3.1 Future needs for the management of waste

As mentioned in the previous section, there are two key issues for the council to consider when formulating its waste policies; to comply with the national policy direction on waste and be mindful of associated guidance and to comply with the London Plan. The last section presented the current picture of waste generated within the borough and waste collected by the council. This section will consider first, what policy position the council needs to adopt to demonstrate compliance with the London Plan apportionment and secondly, the policy position its needs to adopt with regards to NPPW compliance.

3.2 The London Plan apportionment

The London Plan (2016) sets out the ambition to be self-sufficient with regards to the management of waste by 2026. This includes working towards zero biodegradable or recyclable bale waste to landfill by 2026. To help achieve this, the London Plan has given a target (called the 'apportionment' figure) to manage a share of the household and commercial & industrial waste to each borough. The apportionment figures in the draft London Plan are set out below.

Table 7 Draft London Plan (2017) waste apportionment for Westminster (thousand tonnes per annum)

	2021	2041
Household and Commercial & Industrial	188	199

Across London, local authorities have adopted various mechanisms to manage their apportionments depending on the land availability they have to accommodate strategic waste management facilities, deemed by the NPPW to be a minimum of 0.9ha. Given the strategic nature of waste arisings, the facilities required to manage these and the land required to accommodate such facilities, all but two local authorities have had to pool their apportionments to meet their waste management requirements. Only the council and Tower Hamlets have not as yet pooled their apportionments. Tower Hamlets has enough land available to accommodate strategic facilities to be self-sufficient in managing its apportionment but the council does not. The analysis below seeks to demonstrate the lack of land available for strategic waste management facilities. Following this analysis, there follows further analysis of existing waste partnerships to ascertain if the council is able to pool its apportionment with any of them.

3.2.1 Consideration of sites and areas

There are currently no strategic waste management facilities in Westminster. Evidence for the Westminster Core Strategy (2009) concluded that there were no suitable sites available for waste facilities. The consequence is that the council has been unable to meet its London Plan apportionment and has been relying on waste management facilities outside of the city.

Since the preparation of the Core Strategy, the policy context for waste planning has seen major changes on both European, national and regional levels. This includes the detailed criteria for site selection in the National Planning Policy for Waste. In this light, it is important to re-evaluate potential sites to determine if there is any capacity in Westminster to locate waste management facilities.

The consideration of sites and areas takes place through the following stages:

1. Identification of all potential sites and areas
2. Waste sites sieve analysis
3. Site specific analysis of sites
4. Identification of waste sites.

The criteria for assessing the suitability of sites and/or areas for new or enhanced waste management facilities are set out in the National Planning Policy for Waste. These include:

- Physical and environmental constraints on development
- Capacity of existing and potential transport infrastructure
- Cumulative impact on the well-being of the local community

The London Plan also contains criteria that should be considered when evaluating proposals for waste facilities. These include:

- Local suitability
- Proximity to the source of waste
- The nature of activity proposed and its scale
- Minimising waste and achieving high reuse and recycling performance
- Achieving a positive carbon outcome of waste treatment methods and technologies
- The environmental impact on surrounding areas
- The full transport and environmental impact of all transfer and disposal movements

3.2.2 Identification of all potential sites and areas

The National Planning Policy for Waste states that a broad range of locations including industrial sites should be considered, looking for opportunities to co-locate waste management facilities with complementary activities. Priority should be given to the re-use of previously developed land, sites identified for employment uses and redundant agricultural and forestry buildings.

The London Plan states that boroughs should identify sites in strategic industrial locations and locally significant employment areas to bring land forward to manage borough waste apportionments, as well as through protecting and maximising the use of existing waste sites and safeguarding wharves with waste management potential.

The potential typologies of land set out in national and London policy mentioned above are to be considered below. It must be noted that it is by no means suggested

that any of these sites are suitable for waste management facilities at this stage of the process.

Strategic Industrial Locations

There are no Strategic Industrial Locations in Westminster.

Locally Significant Employment Areas

There are no Locally Significant Employment Areas in Westminster.

Existing waste sites

There are no licensed waste management facilities in Westminster. However, Westminster does contain a network of waste related sites where waste is consolidated for onward transport, which might have some potential for intensification or co-location of other waste. Although many of these sites are very small, this will be assessed in the following stage. For the purpose of this analysis, 158 sites have been considered.

Other industrial land

There are no other (designated) industrial areas in Westminster. The individual sites with industrial uses that do exist in the city are of mixed use and are not purpose built industrial locations. Therefore, no potential industrial sites have been identified.

Wharves

There are no wharves in Westminster.

Previously developed land

The National Planning Policy Framework defines previously developed land as land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure.

For the purpose of this assessment both vacant and derelict sites, and land and buildings in use that may be available for redevelopment will be considered. These include key development sites allocations in the City Plan, sites with unimplemented planning permission, sites with “pending planning decision”, sites in the Brownfield Register and other sites with potential for (re-)development.

For the purpose of this analysis, 1,405 previously developed land sites have been considered.

A total number of 1,563 sites will be considered in the following stage and are grouped as follows:

Table 8 Waste potential sites considered by type

Waste potential sites identified by type		Number of facilities / sites
Existing waste facilities		158
Of which:	In Vessel Composter (decommissioned)	1
	Street Cleansing Depot	12
	Micro Recycling Centre	145
Previously developed land		1,405
Of which:	Key development sites (New City Plan)	47

	Sites with “unimplemented planning permission”	756
	Sites that are under construction	501
	Sites in the “Brownfield Register” (2017)	101

3.2.3 Waste site sieve analysis

In this stage, an initial sieve of the potential sites was made using GIS data to analyse the suitability of sites for waste management facilities. The purpose of this stage is to eliminate sites with heavy constraints that are not realistically suitable to provide waste management facilities. Remaining sites will be assessed in more detail in the following stage.

For the purpose of the site sieve analysis, the site selection criteria from the National Planning Policy for Waste and the London Plan have been refined in line with best practice and made locally applicable and measurable. Particular regard has been given to the locational criteria in Appendix B of the National Planning Policy for Waste.

At this stage a comprehensive assessment considering all criteria is not yet provided. Instead, only major constraints are identified. A negative score against the criteria below will result, either individually or cumulatively, in that a site will not be progressed through to the next stage.

Table 9 Site sieve criteria

Criterion	Indicator	Justification
Nature conservation	More than 250m from a designated nature conservation area.	Close proximity to an area of nature conservation will result place a strong environmental constraint on facilities.
Historic environment	Outside the curtilage of listed buildings (100m) and the World Heritage Site (400m).	The location near important heritage assets would heavily constrain any waste management facilities. Conservation Areas have not been included at this stage, although they would in most instances impact on the siting of facilities.
5 year housing land supply	Not identified on list of 5 year housing land supply	The council has a statutory responsibility to demonstrate a 5 year housing land supply, causing a land use conflict.
Crossrail Safeguarding Zone	Not located within Crossrail Safeguarding Zone	To prevent conflicting development that could preclude the future construction of Crossrail.
Transport infrastructure	Within 100m of the rail network, river/canal network, or main road network.	Proximity to the transport network is an essential criterion for waste management facilities. 100m is considered to be a reasonable distance for access to the transport network.

The results of the site sieve analysis can be found Appendix C. A total number of 52 sites were carried forward to the following stage, some of them only falling partially within the areas with potential and are classified as follows:

Table 10 Waste potential sites considered by type (post sieve analysis)

Waste potential sites considered by type		Number of facilities / sites
Existing waste facilities		12
	Micro Recycling Centre	12
Previously developed land		40
Of which:	Key development sites (New City Plan)	1
	Sites with “unimplemented planning permission”	25
	Sites that are under construction	9
	Sites in the “Brownfield Register” (2017)	5

3.2.4 Detailed site analysis

The previous stages of identifying potential sites, followed by the initial sieve of these potential sites has highlighted 52 sites that might have some potential to locate a waste management facility. In this stage, the remaining sites have been assessed in more detail.

Technical feasibility

Sites need to be of a certain threshold to be considered strategic and provide a certain capacity. Some of the identified sites are very small and cannot host a waste facility. A minimum area size of 0.9ha has been considered as necessary to find a balance between local and strategic sites.

A total number of 3 sites were carried forward to the next stage.

Availability and planning issues

The availability of the site is an important consideration. A site can only be allocated in the Local Plan if there is a likelihood that the site will come forward for redevelopment over the plan period.

Annex B of the National Planning Policy of Waste sets out locational criteria that should be considered in testing the suitability of sites and areas, bearing in mind the type and scale of envisaged waste management facilities.

These criteria are set out below:

- Protection of water quality and resources and flood risk management
- Land instability
- Landscape and visual impacts
- Nature conservation
- Conserving the historic environment
- Traffic and access
- Air emissions, including dust
- Odours
- Vermin and birds
- Noise, light and vibration

- Litter
- Potential land use conflict

Many of these criteria will depend upon the type, size, design and layout of the facility and are therefore difficult to assess. The assessment will therefore concentrate on the likely planning issues that will arise in each specific location, taking account of existing uses on and surrounding the site as well as policies currently in place.

The results of the detailed planning issues analysis can be found in Appendix C. No sites were considered suitable as a result of this assessment.

3.2.5 Results

The above analysis has shown that there are currently no sites that could potentially be used to accommodate waste management facilities in Westminster. The initially identified sites do not meet the eligibility criteria.

3.2.6 Apportionment pooling

Given the lack of sites to accommodate waste facilities to manage the council's apportionment of 199ktpa to 2041, the council now needs to work collaboratively with other waste planning authorities to ascertain the potential to pool its apportionment with them.

This exercise entails the following steps:

1. Review the responses received from letters issued under the Duty to Co-operate to assess which London waste planning authorities have the capacity to accept the council's apportionment
2. Identify which waste planning authorities would be open to collaboration and enter into discussions as to what their current waste management is capacity, what it is likely to be over the duration of the Plan period and if this leaves capacity for the council's apportionment to be accepted.
3. What further evidence, data or information is required to enable the pooling and what would be the issues/barriers that would need to be addressed for this to be possible.
 - a. The council to carry out a Waste Data Study
 - b. The waste planning partnership has an up-to-date waste technical paper/plan/ joint DPD
 - c. Consideration of arrangement for pooling in lieu of contributory capacity – draft Statement of Common Ground
 - d. Member agreement

The analysis of waste planning authorities' responses regarding future capacity and potential to pool apportionment and outcomes are represented in Appendix D and shows that very few waste planning authorities were in a position to consider, much less accept, the council's apportionment. However, there is potential to collaborate with the South East London Joint Waste Planning Group. The council already manages its waste at facilities in South East London via its contract with Veolia as demonstrated in 2.3 above.

At this point, it is also pertinent to note from the analysis of rolling tonnage, in section 2.3 above, the last 12 months data and 20 year trend data shows that at an average of 187ktpa, the council has already been managing almost all of its 188ktpa apportionment for 2021 and 93% of its 199 ktpa apportionment for 2041. Of this, 155-160ktpa is sent to the South East London facilities¹¹. This amounts to 85% of its 2021 apportionment or 80% of its 2041 apportionment going to waste management facilities in South East London.

Although the apportionment exercise is unrelated to how waste is actually managed on the open market, the council seeks to “formalise” its arrangement with the South East Waste Planning Group through this pooling exercise. In approaching the Group, the council is in a similar situation to the City of London when it approached the Group to pool in 2010. Like Westminster, the City did not have any land availability to accommodate any strategic waste management facilities and so, in lieu of any contributory capacity to the Group’s collective capacity, it arrived at a financial arrangement¹².

The council has held discussions with the chair of the South East London group and LBs Lewisham and Southwark regarding the current capacity position of the group and has been advised that the technical paper is being updated along with Local Plan drafts as and when required. LB Southwark will soon be submitting its Local Plan so the technical paper is currently being updated as part of their Local Plan work. The council will soon be carrying out a further waste data study to submit to the group for its consideration in its own Joint Technical Paper update to ascertain the capacity the Group has to accept the council’s apportionment. The GLA have signed a Statement of Common Ground acknowledging the council’s efforts to meet its apportionment obligation.

One of the key facilities within the group is the Riverside Resource Recovery EfW facility in Bexley. Its owners, Cory Environmental Holdings, have submitted a DCO application to PINS for significant expansion of this facility, the examination of which has just closed. The council wrote to PINS in support of the application¹³ and hopes that if it is granted in January, the SE London group will be in a stronger position to accept the council’s apportionment.

3.3 Strategic Waste Planning under the NPPW

As demonstrated in section 2.2, the council has a good general understanding of the tonnages per waste stream generated within the borough. However, it currently does not monitor these arisings nor has any Statement of Common Ground with local authorities outside London accepting the waste generated in the borough to ensure management of this waste in the future.

Under the Duty to Co-operate, the council wrote to these authorities to ascertain their capacity for managing all waste generated in Westminster over the plan period in order to comply with the NPPW for the management of waste arisings across the

¹¹ WRAP, Materials Facility Reporting Portal, Veolia returns to WCC Waste and Parks Team

¹² Appendix E

¹³ Letter of support to Riverside Energy Park Examining Authority, June 2019

seven waste streams. This provided a limited and varied picture of future management needs. While some authorities do not receive strategic amounts of waste from Westminster and therefore is not of concern, some responders do accept strategic amounts and of these some sites are due to close due to reaching capacity or through other land use pressures¹⁴. See Appendix F.

Given the significant number of waste destinations strategic amounts of waste go to¹⁵ and given the level of response received via the Duty to Co-operate in comparison, the council will soon be undertaking a further waste data study to understand how much strategic tonnage of what kind of waste is going where and then seek to establish Statements of Common Ground with these authorities to ensure the future management of these waste streams generated in the borough. The three key waste streams will be household, commercial and industrial (minus the C&I element of apportionment) and CDE, which is extremely significant given the levels of development and infrastructure construction within the borough boundaries.

This study will also allow the council to monitor the success of its City Plan waste policies and associated guidance to reduce these waste streams and agree and align with the relevant authorities which measures and datasets are used to calculate and analyse waste exports (there is considerable inconsistency across the country regarding measures and indicators used on various waste streams)

¹⁴ Duty to Co-operate Statement

¹⁵ Appendix A

Appendix A - Waste destinations

Table 11 Destinations of Westminster's waste (WDI 2014/15/16)

Destination	2013/14	2014/15	2015/16	Total 3 year period	%
Ealing WPA	16154.58	99401.56 2	231978.55 7	347534.699	35.6%
Kent WPA	129556.39 9	37.719	31.335	129625.453	13.3%
Newham WPA	22494.926	22440.27 3	50492.869	95428.068	9.8%
Thurrock WPA	75289.408	10555.74 3	8038.616	93883.767	9.6%
Hertfordshire WPA	1277.679	36038.21 3	10614.88	47930.772	4.9%
Brent WPA	17868	15326	13018	46212	4.7%
Barnet WPA	20073.68	13838.18	9402.605	43314.465	4.4%
Greenwich WPA	6157.78	12641.42	16570.16	35369.36	3.6%
Essex WPA	7019.485	2428.585	16898.961	26347.031	2.7%
Merton WPA	5910.584	7925.377	4729.547	18565.508	1.9%
Havering WPA	7479.08	4646.64	6277.7	18403.42	1.9%
Hillingdon WPA	14156	510	2925	17591	1.8%
Barking and Dagenham WPA	6264.105	5581.707	4791.972	16637.784	1.7%
Wandsworth WPA	1498.74	5809.82	3586.86	10895.42	1.1%
Slough WPA	2752.91	2968.15	3581.06	9302.12	1.0%
Westminster City WPA		2368.12	2715.988	5084.108	0.5%
Surrey WPA	19.735	388.946	4534.205	4942.886	0.5%
Southwark WPA	1865.75			1865.75	0.2%
Buckinghamshire WPA		190.14	1593.35	1783.49	0.2%
Milton Keynes WPA	584.98	18.06	1072.4	1675.44	0.2%
Wiltshire WPA		85.12	390.82	475.94	0.0%
Dorset WPA	450			450	0.0%
Enfield WPA	91.76	58.28	221.74	371.78	0.0%
Waltham Forest WPA	120.076	119.599	51.9	291.575	0.0%
Warrington WPA	106.51	135.689		242.199	0.0%
Lewisham WPA	96.2		123.1	219.3	0.0%
Wokingham WPA	60.845	65.578	50.316	176.739	0.0%
Warwickshire WPA	4.81	28.233	106.226	139.269	0.0%
Northamptonshire WPA	0.15	0.015	132.46	132.625	0.0%
West Sussex WPA		65.6	32	97.6	0.0%
Halton WPA			97.208	97.208	0.0%
Bolton WPA	50.82	3.277	2.64	56.737	0.0%
Birmingham City WPA		2.647	40.437	43.084	0.0%
Staffordshire WPA	0.44	21.385	21.201	43.026	0.0%
Manchester WPA			41.555	41.555	0.0%
Bedford WPA	15.727	13.464	11.242	40.433	0.0%

Central Bedfordshire WPA	20	20		40	0.0%
Cambridgeshire WPA			36.117	36.117	0.0%
Hampshire WPA	6.84	1.585	24.068	32.493	0.0%
Sandwell WPA	13.18	4.905	9.708	27.793	0.0%
Tower Hamlets WPA	2.74	16.851	5.234	24.825	0.0%
Bristol City WPA	20.164	0.04	2.873	23.077	0.0%
Nottingham City WPA	22.042			22.042	0.0%
West Berkshire WPA	6.4	15.28	0.2	21.88	0.0%
Medway WPA	7.66	2.149		9.809	0.0%
Norfolk WPA		0.1	8.066	8.166	0.0%
Oxfordshire WPA	7.145	0.72		7.865	0.0%
Sheffield WPA	6.07		0.49	6.56	0.0%
Knowsley WPA	0.988	3.433	1.681	6.102	0.0%
Croydon WPA			4.529	4.529	0.0%
Gloucestershire WPA		0.12	3.34	3.46	0.0%
Salford WPA			3	3	0.0%
Stockton-on-Tees WPA	2.67			2.67	0.0%
Cheshire West and Chester WPA	1.82			1.82	0.0%
Reading WPA	1.695			1.695	0.0%
Suffolk WPA	1.602			1.602	0.0%
Leicestershire WPA	0.234	0.029	0.482	0.745	0.0%
Lincolnshire WPA	0.24	0.2		0.44	0.0%
Coventry WPA		0.1	0.1	0.2	0.0%
Trafford WPA	0.014			0.014	0.0%
Peterborough WPA	0.011			0.011	0.0%

Appendix B - Hazardous waste destinations

Table 12 Destinations of Westminster's hazardous waste (WDI 2014/15/16)

Destination	2013/14	2014/15	2015/16	Total 3 year period	%
Essex WPA	97.425	110.045	144.901	352.371	28%
Newham WPA	80.814	77.887	146.281	304.982	24%
Hertfordshire WPA	111.928	57.563	80.41	249.901	20%
Wokingham WPA	14.566	12.332	23.797	50.695	4%
Kent WPA	9.54	14.255	14.456	38.251	3%
Bedford WPA	15.553	10.995	10.154	36.702	3%
Surrey WPA	14.565	7.226	12.745	34.536	3%
Staffordshire WPA	0.44	16.869	11.985	29.294	2%
Warrington WPA	12.574	12.67		25.244	2%
Tower Hamlets WPA	2.74	16.851	5.234	24.825	2%
Nottingham City WPA	14.963			14.963	1%
Bristol City WPA	11.464	0.04	2.098	13.602	1%
Sandwell WPA	1.14	2.625	8.708	12.473	1%
Halton WPA			11.975	11.975	1%
Barking and Dagenham WPA	9.839			9.839	1%
Birmingham City WPA		0.442	8.682	9.124	1%
Medway WPA	5.78	2.149		7.929	1%
Knowsley WPA	0.988	3.408	1.166	5.562	0%
Manchester WPA			5.03	5.03	0%
Croydon WPA			4.289	4.289	0%
Warwickshire WPA			3.641	3.641	0%
Gloucestershire WPA			3.28	3.28	0%
Salford WPA			3	3	0%
Stockton-on-Tees WPA	2.67			2.67	0%
Bolton WPA	2.15			2.15	0%
Norfolk WPA		0.1	1.899	1.999	0%
Cambridgeshire WPA			1.642	1.642	0%
Suffolk WPA	1.602			1.602	0%
Leicestershire WPA	0.234	0.029	0.481	0.744	0%
Cheshire West and Chester WPA	0.65			0.65	0%
Sheffield WPA			0.49	0.49	0%
Lincolnshire WPA	0.24	0.2		0.44	0%
Northamptonshire WPA	0.15	0.015		0.165	0%
Thurrock WPA	0.05			0.05	0%
Trafford WPA	0.014			0.014	0%
Oxfordshire WPA	0.005			0.005	0%

Appendix C – Site analysis

Figure 4 Identification of all potential sites and areas (stage 1)

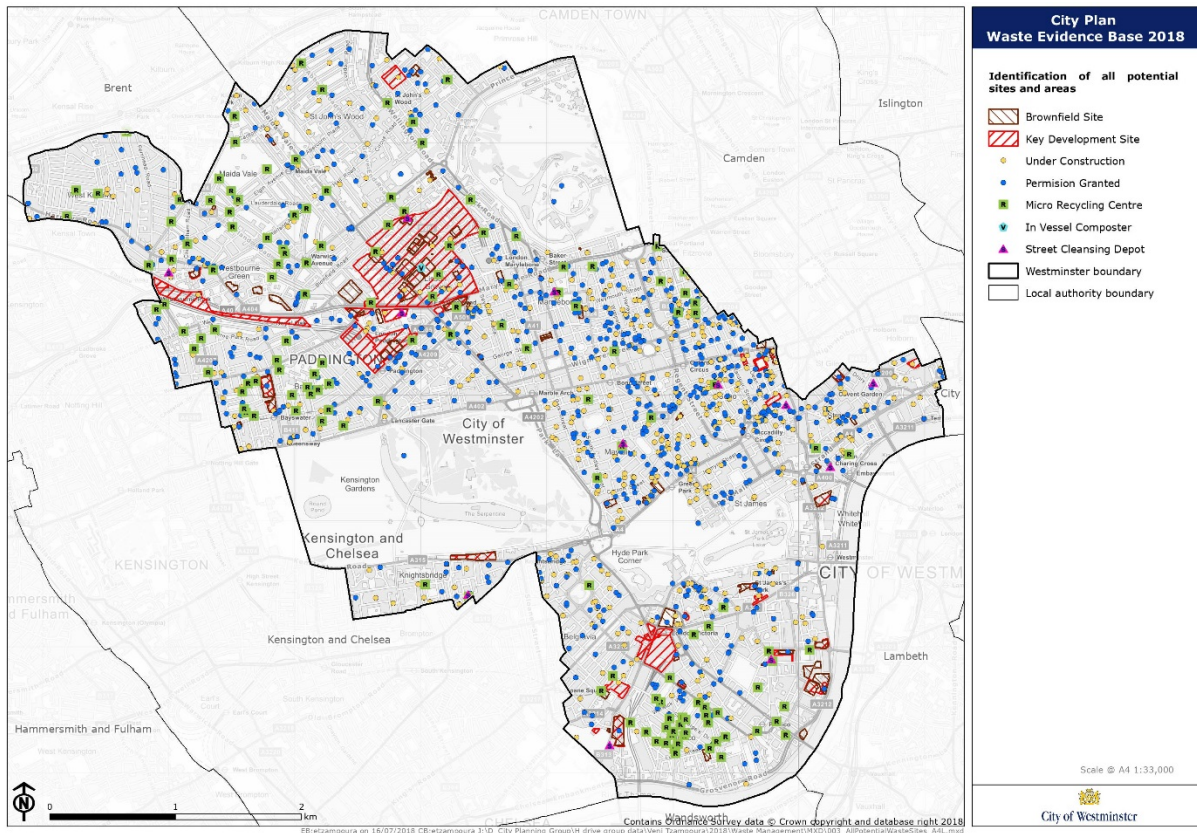


Figure 5 Constraints for sieve analysis (stage 2)

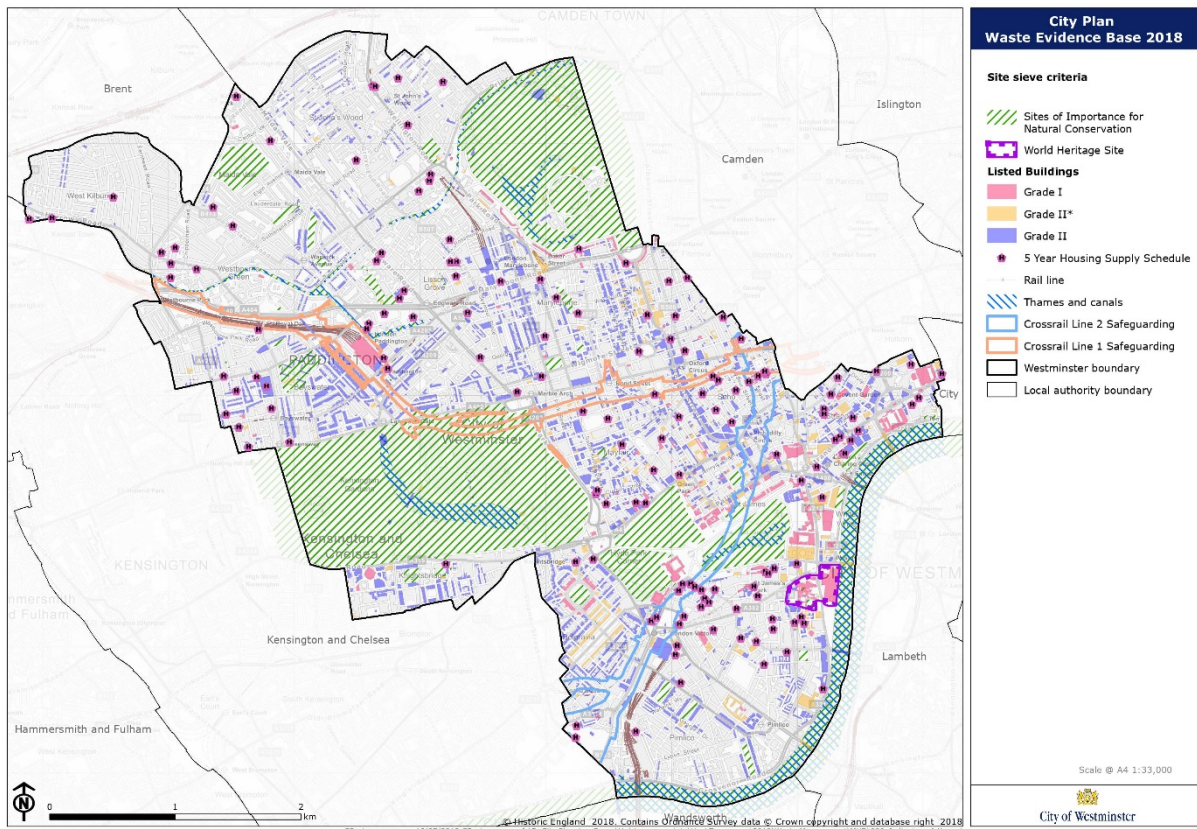


Figure 6 Waste site sieve analysis results (stage 2)

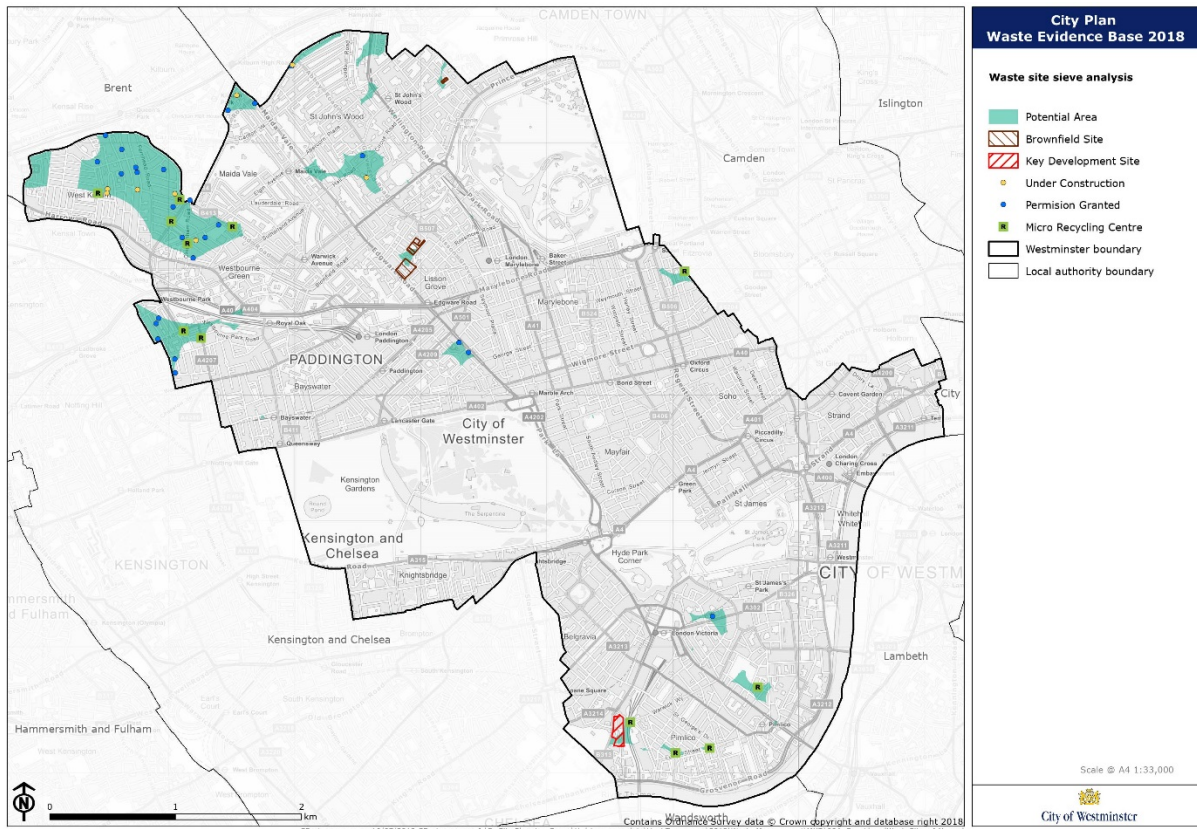


Table 13 Waste site technical feasibility analysis (stage 3)

FID	Ref	Address	Status	Source	Size (ha)
5	13/05695/COFUL	Tollgate Gardens Estate Oxford Road London NW6 5SN	U/C	Unimplemented Application (Pipeline 2016/17)	1.19
1		Church Street Site C		Brownfield Register 2017	1.32194
6		Ebury Bridge Estate		Key development sites 2018 and Brownfield Register 2017	1.87802

Table 14 Waste site technical feasibility and availability analysis (stage 3)

Address	Planning issues and availability
Tollgate Gardens Estate	<p>The Tollgate Gardens Estate site only partially complies with the criteria set out at stage 2 (see figure 6). Accordingly, only part of the site can be considered as potential land.</p> <p>The area is currently under development as planning permission was granted in November 2013 for the regeneration of the whole estate. New terraces will accommodate new homes and a new community centre will be provided. The project has come forward for development very recently and, accordingly, the site cannot be considered as available and cannot host a new waste facility.</p>
Church Street Site C	<p>The Church Street Site C only partially complies with the criteria set out at stage 2 (see figure 6). Accordingly, only part of the site can be considered as potential land.</p> <p>At the moment, the area is built and accommodates 139 council owned homes and has a retail frontage at ground floor level.</p> <p>The whole area is affected by the Draft Church Street Masterplan (September 2017) which defines one of the most important planning and regeneration projects in Westminster. The masterplan creates a framework for all development in the area which was also designated as part of the Edgware Road Housing Zone by the Greater London Authority in 2014. Although the Church Street C site has not been developed yet, according to the Masterplan the area has potential to deliver 360 new homes, commercial floorspace and residential amenity space. The project will very likely come forward for development over the Plan period. Accordingly, the site cannot be considered as available and cannot host a new waste facility.</p>
Ebury Bridge Estate	<p>The Ebury Bridge Estate site only partially complies with the criteria set out at stage 2 (see figure 6). Accordingly, only part of the site can be considered as potential land.</p> <p>The area is currently home to residents that occupy council owned homes. The estate also accommodates a children's playground and a multi-use games area.</p>

	<p>The whole area is affected by the Ebury Bridge Renewal project that will provide the area with new homes, new retail floor space and new public spaces. Although the area has not been developed yet, the project will very likely come forward for development over the Plan period. Accordingly, the site cannot be considered as available and cannot host a new waste facility.</p>
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Appendix D - Partnership-working to meet the draft London Plan Apportionment

The draft London Plan sets a target for the Westminster City Council to identify 199,000 tonnes of waste management capacity by 2041 within its boundaries or work collaboratively with other boroughs to identify capacity elsewhere in London. Evidence from a site sieve and analysis shows that there is no deliverable waste management capacity in the City. Therefore, collaborative working will be necessary.

This paper explores the potential to work with other London boroughs to meet the council's draft London Plan waste apportionment. It pulls together the several pieces of evidence including responses received by the council in exercising its Duty to Co-operate, waste data studies undertaken by local authorities and waste partnerships and representations made between local authorities' Local Plan consultations. The result is an overview of the positions of boroughs/waste planning groups regarding their ability to accept the council as a new pooling partner.

The council also notes that in responses received some waste management partners have placed on-hold the development or updates of their waste management plans while awaiting the outcome of the Inspector's decision on the draft London Plan's new targets and calculation methodology. The consequences of this for the council are that this limits some opportunities to partner on addressing its apportionment at this point in time.

Table 15 North London Waste Authority

London Borough(s)	Last updated Waste Plan	Current apportionment and capacity position	Possibility for WCC to pool?
Barnet Enfield W. Forest Islington Camden Hackney	Jan 2019 (at EiP)	The North London Boroughs are at the latter stages of preparing the North London Waste Plan with Examination in Public in late 2019. It is not therefore a good moment to incorporate Westminster into the NLWP at this stage.	No
Pooled apportionment, ktpa, % London total	Current LP: Draft LP:	'21 – 1,211 '21 – 1,307	'36 – 1, 507 '40 – 1,390 % %

Table 16 South London Waste Partnership

London Borough(s)	Last updated Waste Plan	Current apportionment and capacity position	Possibility for WCC to pool?
Croydon Sutton Merton Kingston	March 2012	Potential for the SLWP to be net self-sufficient in LACW and C&I terms by 2021, but still far from assured. Therefore, the South Waste Plan boroughs are not able to take any WCC apportionment. ¹⁶	No
Pooled apportionment, Ktpa, % London total	Current LP:	'21 - 669	'36 - 832
	Draft LP:	'21 - 887	'40 - 944

Table 17 West London Waste Authority

London Borough(s)	Last updated Waste Plan	Current apportionment and capacity position	Possibility for WCC to pool?
Brent Ealing Hillingdon Harrow Hounslow Richmond	July 2015	When draft London Plan is adopted, boroughs will need to review capacity (existing or allocated) to manage the revised apportionments. Therefore, WLWA is not able to commit to accepting the waste apportionment of another local authority before this review has been undertaken.	Unable to commit at this point in time.
Pooled apportionment, Ktpa, % London total	Current LP:	'21 - 1,285	'36 - 1,597
	Draft LP:	'21 - 2,084	'40 - 2,223

Table 18 Western Riverside Waste Authority

London Borough(s)	Last updated Waste Plan	Current apportionment and capacity position	Possibility for WCC to pool?
Kensington & Chelsea Hammersmith & Fullham Wandsworth	Jan 2017	The boroughs prepared a Joint Waste Technical Waste Paper in 2017. This needs to be updated following revised draft London Plan apportionments, the establishment of the OPDC and its	No

¹⁶ DtC written confirmation from LB Merton on behalf of SLP partners, Apr 2019

Lambeth	<p>access restrictions to facilities for WRWA members¹⁷ and member challenges¹⁸.</p> <p>Wandsworth: Reviewing waste management sites as the adopted position is now considered out of date. Initial work on this indicates that Wandsworth does not have any spare capacity to assist WCC. Conducting waste sites analysis as part of Reg 18 Local Plan in March 2020, after which there will be more clarity on whether there is any additional capacity.¹⁹</p> <p>Kensington & Chelsea: There is a waste management capacity shortfall and the Waste Technical Paper confirms there are currently no opportunities to allocate waste sites to meet the shortfall. Therefore, the council needs to identify suitable land elsewhere outside of the borough and work with the other WRWA WPAs including the Old Oak and Park Royal Development Corporation and if necessary other London Boroughs.²⁰</p>		
Pooled apportionment, Ktpa, % London total	Current LP: '21 – 789 Draft LP: '21 - 733	'36 – 980 '40 - 777	 %

Table 19 East London Waste Authority

London Borough(s)	Last updated Waste Plan	Current apportionment and capacity position	Possibility for WCC to pool?
Barking & Dagenham Redbridge Havering Newham	Feb 2012	Commissioning new Joint Waste Plan alongside their respective Local Plan work. Programme still to be finalised.	Unable to commit at this point in time.
Pooled apportionment	Current LP: '21 – 1,119 Draft LP: '21 - 1,409	'36 – 1,390 '40 – 1,487	 %

¹⁷ DtC written confirmation, OPDC, June 2019

¹⁸ 2nd Reg 19 Consultation response, Res Ref 47 - Policy EU6, RBKC, LB Lambeth & Wandsworth

¹⁹ DtC written confirmation, Western Riverside Waste Authority - LB Wandsworth, Apr 2019

²⁰ RBKC Waste Policy Formulation Paper, LPPR (2019)

Ktpa, % London total	
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Table 20 South East London Joint Waste Planning Group

London Borough(s)	Last updated Waste Plan	Current apportionment and capacity position	Possibility for WCC to pool?
Southwark Lewisham Greenwich Bromley Bexley City of London	Jan '14	<p>The group's Waste Technical Paper is updated for each authorities' Local Plan preparation. Southwark and Lewisham are currently preparing their Local Plan reviews, so it is timely to approach them to co-operate.</p> <p>The latest version of the paper shows a spare capacity of 365ktpa to 2041. If WCC joined the group, its 199ktpa draft new London Plan target would reduce the Group's capacity to 166ktpa.</p>	To be further explored.
Pooled apportionment ktpa, % London total		Current LP: '21 – 1,293 Draft LP: '21 – 1,405	'36 – 1,582 '40 – 1,492 % %

Table 21 London Borough of Tower Hamlets

London Borough(s)	Last updated Waste Plan	Current apportionment and capacity position	Possibility for WCC to pool?
Tower Hamlets	2019 (not yet adopted)	<p>Tower Hamlets currently accommodates its own apportionment.</p> <p>For the Local Plan 2031, the 2017 waste data study identified a shortfall in existing capacity and apportionment. The site search for additional capacity identified 3 areas to help meet the capacity shortfall between existing capacity and apportionment to 2036. Following adoption of the draft London Plan, a review of capacity and new apportionments to be carried out.²¹</p>	No

²¹ LBTH, Waste Management Evidence Base Review 2017

Apportionment, Ktpa, % London total	Current LP: '21 - 252	'36 - 313	%
	Draft LP: '21 - 195	'40 - 207	%

Table 22 Westminster City Council

London Borough(s)	Last updated Waste Plan	Current apportionment and capacity position	Possibility for WCC to pool?
Westminster		Does not formally pool with any local authorities and partners and is unable to accommodate its own apportionment.	
Apportionment, ktpa, % London total	Current LP: '21 - 99	'36 - 124	%
	Draft LP: '21 - 188	'40 - 199	%

A review of waste partnerships in London concludes that whilst there are many uncertainties and dependencies, there may be opportunities for Westminster to pool its London Plan waste apportionment with other London Boroughs.

Most notably, there may be potential to partner with the South East London Joint Waste Planning, as they have identified spare capacity. The table below presents the modelled capacity of each member of this group against the draft London Plan apportionment targets.

Table 23 South East London capacity

New draft London Plan	2021	2036	2041
Bromley	95,240	109,288	Assumed as per capacity at 2036
Bexley	1,224,297	1,224,297	
City of London	0	0	
Lewisham	502,623	503,152	
Royal Greenwich	99,072	105,893	
Southwark	106,950	111,150	
Total	2,028,182	2,053,780	
Combined draft new London Plan apportionment target	1,405,000	N/A	1,492,000
Collective projected total surplus	623,182	N/A	561,780
Projected surplus capacity from operational sites	417,582	N/A	365,180

Source: LBS Local Plan Evidence Base: Southeast London Waste Technical paper, Dec 17

The technical paper shows a capacity of 365ktpa to 2041. If WCC joined the group, its 199ktpa target would reduce the Group's capacity to 166ktpa.

Appendix E – Pooling agreement between City of London and LB Bexley/South East London Joint Waste Planning Group

Town Clerk & Chief Executive
Chris Duffield



Telephone 020 7332 1400
Email chris.duffield@cityoflondon.gov.uk

Date 10th August 2010

Will Tuckley
Chief Executive
London Borough of Bexley
Civic Offices
Broadway
Bexleyheath
DA6 7LB

Dear Will,

Following constructive discussions between ourselves and your colleagues over recent months, I write to set out how I see the key elements of an agreement to work more closely together moving forward. It is recognised that such an agreement in principle would be subject to any necessary approvals of our respective Members.

- Both sides recognise that there are close and growing links between the City and Bexley regarding waste management matters. The City's municipal waste will soon be transported sustainably from Walbrook Wharf in the City by Thames river barge to the new energy-from-waste riverside facility at Belvedere in Bexley. This helps provide a base load to ensure that Belvedere operates at optimal efficiency and contributes to the Mayor of London's objectives that more of London's waste should be transported sustainably and should be managed within London.
- As part of the closer working on waste management matters Bexley and the City will cooperate to identify sufficient waste management facilities to meet their combined London Plan waste management apportionments. The Mayor's revised waste apportionments (Dec 2009), if adopted, will result in surplus waste management facilities and capacity in Bexley, and it is proposed that part of the surplus should be identified to provide the capacity to manage the City's total 'waste management apportionment' as set out in the London Plan; i.e. 100,000 tonnes per annum throughout the plan period as detailed in table 5.3 of the draft replacement London Plan minor alterations (Dec 2009). The agreement would allow the City to identify Bexley as partner borough for waste apportionment purposes in its LDF Core Strategy, thereby satisfying policy 5.17 of the draft replacement London Plan. Bexley would explore whether Bexley's draft Core Strategy Policy CS10 should be updated for consistency to allow for collaboration beyond the South East London Joint Waste Group. Bexley and the City will also liaise to update in a complementary way the supporting evidence base for our respective LDF Core Strategies.
- The City Corporation currently manages London's hazardous waste service on behalf of all London Boroughs including Bexley. The next five year management contract is just being

finalised and it is expected that the revised annual fee will be £3,300 pa. In recognition of the closer working referred to above, and subject to Member approval, the City Corporation intends granting Bexley £16,500 as a commuted sum equivalent to the annual fee for a 5 year period. Bexley will still need to pay the actual fee as that is part of a London-wide agreement, however the commuted sum will offset this fee.

- Our shared aspiration is to work more closely together not only on waste management issues but also on other issues of economic, social and environmental benefit to our areas. The City Corporation is mindful that both the City and Bexley have a strong mutual interest in the timely regeneration of the Thames Gateway area for the benefit of London as a whole. In this context the City is willing to cooperate further with Bexley regarding economic development initiatives to encourage higher skilled businesses and workforce within the Bexley Thameside section of the Gateway. Practical measures could be investigated and progressed through meetings between officers of the two authorities aiming to promote a broad based awareness of how we look after the needs of business and promote partnership working through various initiatives.
- In parallel with the above developments, I also understand that the Grants Committee of the City Bridges Trust (CBT) has awarded a grant of £10,000 to the Bexley Heritage Trust for a feasibility study on refurbishment at Lesnes Abbey. Subject to the outcome of this feasibility study CBT may also be able to consider a capital grant of up to £100,000 for refurbishment at Lesnes Abbey. CBT's usual policy is up to £50,000 for capital grants. However, in this case, because of its potential to support environmental education and its historical and heritage interests it may merit a larger grant than is CBT's usual practice, subject to the relevant criteria being satisfied and the decision of the Grants Committee.

I trust that the above elements reflect our joint commitment to closer cooperation on waste management and other matters to the mutual benefit of both the City and Bexley, and I look forward to receiving your confirmation of this proposed way forward.

With kind regards,
Chris

Appendix F – Duty to Co-operate responses from non-London Local authorities on strategic waste management

Authority	1 – Is this a matter of strategic importance ?	2 – Confirm whether you have capacity to take Westminster’s apportioned waste	3 – Confirm whether you can continue to receive waste at comparable levels
Bedford Borough Council	No	No comment	Only for two more years maximum due to lack of space and sites. Unless new sites become available although it is unlikely.
Buckinghamshire County Council	No	No comment	Yes, Buckinghamshire are able to continue receiving waste until 2021 at least.
Essex County Council	Yes	No comment	Yes, but not to the same scale as in 2017. Due to site capacities.
Hertfordshire County Council	No	No comment	Yes, Hertfordshire are able to continue receiving waste at comparable levels.
Kent County Council	No	No comment	Yes, as long as levels similar to 2015-2017 are maintained rather than the hundreds of thousands in 2013/14 (As long as we do not ramp up significantly).
Milton Keynes Council	Yes	No comment	Awaiting information from sites. The only landfill site is due to close in 2022 but may apply to extend its planning permission. Cannot guarantee at this time that they can take waste after 2022.
Sandwell Council	No	No comment	Yes, Sandwell are able to continue receiving waste at comparable levels.
Surrey County Council	Yes	No comment	Yes, Surrey are able to continue receiving waste at comparable levels.
Wokingham Borough Council	No	No comment	Wokingham along with three other Central and Eastern Berkshire Authorities are currently working in collaboration with Hampshire County Council to provide a Joint Minerals and Waste Plan. Regulation 18 draft consultation was only just completed and therefore a final decision on all site allocations is yet to be made.

Appendix G – Waste Data Flow data for WCC LACW

Disposal Routes FY 2001-16 Simplified									
	2001/02	2002/03	2003/04	2004/05	2005/06	2006/07	2007/08	2008/09	2009/10
Recycling	10,809	10,584	12,613	14,421	17,116	19,410	21,528	21,900	23,040
EFW & treatment	125,907	131,766	130,987	146,821	137,215	144,837	144,638	137,993	134,224
Landfill	90,231	76,796	69,394	46,099	34,435	26,863	27,293	27,016	30,657
Residual Waste	216,138	208,562	200,381	192,920	171,650	171,700	171,931	165,009	164,880
Total LACW	226,947	219,146	212,994	207,342	188,766	191,110	193,459	186,909	187,920

	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
Recycling	23,220	23,263	24,344	25,974	29,536	30,074	30,915	31,525	34,944
EFW & treatment	133,430	138,021	146,209	150,321	155,220	160,488	158,608	155,174	156,812
Landfill	23,728	14,073	7,801	5,303	3,772	3,976	3,637	1,515	0
Residual Waste	157,158	152,094	154,010	155,624	158,992	164,464	162,245	156,689	156,812
Total LACW	180,378	175,358	178,354	181,598	188,528	194,538	193,160	188,214	194,277

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