

# Westminster City Plan 2019-2040: Waste Data Study

Update October  
2020



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## Executive Summary

- I. This Waste Data Study has been prepared to support Westminster's City Plan 2019-2040.
- II. Westminster City Council (WCC) is required to plan for seven waste streams. The largest of these are Local Authority Collected Waste (LACW), Commercial & Industrial Waste (C&I) and Construction, Demolition and Excavation Waste (CD&E). The London Plan apportions an amount of LACW and C&I waste to each borough and Westminster is required to have regard to these apportionment targets.
- III. Westminster's waste capacity need over the City Plan period is set out in Table E1.

Table E1: Westminster's waste capacity need 2021-2041

Waste stream	2021	2026	2031	2036	2041
Apportionment (LACW and C&I)	188,000	190,000	192,000	196,000	200,000
CD&E waste	290,000	290,000	290,000	290,000	290,000
Hazardous waste included in LACW, C&I and CD&E waste streams					
All other waste streams	0	0	0	0	0

- IV. Westminster has three small-scale composting facilities for the Royal Parks and a number of exempt facilities which contribute to the city's existing capacity. A summary of Westminster's waste management capacity is set out below.

Table E3: Existing waste management capacity in Westminster

Source	LACW/C&I capacity	C&D capacity
Existing licenced waste sites	3,934	0
Exempt waste sites	41,330	1,200
<b>Total</b>	<b>45,264</b>	<b>1,200</b>

- V. Westminster does not have any Strategic Industrial Locations, Locally Significant Industrial Sites or wharves for new facilities. A site search carried out in 2019 identified no sites in Westminster for new waste facilities which are suitable or deliverable. No new waste facilities are known to be coming forward in Westminster.
- VI. Westminster's apportionment target is 200,000 tonnes by 2041. WCC have reached an agreement with the London Borough of Bexley 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.
- VII. Westminster will continue to rely on waste facilities outside its administrative boundaries and have prepared statements of common ground with authorities which receive significant amounts of waste from Westminster.

## 1. Introduction

- 1.1 Westminster is updating the City Plan adopted in November 2016. The council submitted the City Plan 2019-2040 to the Secretary of State in November 2019. The 'Examination in Public' has now started, which is the last stage of the plan-making process.
- 1.2 Westminster City Council (WCC) is required to plan for seven waste streams. The largest of these are Local Authority Collected Waste (LACW), Commercial & Industrial Waste (C&I) and Construction, Demolition and Excavation Waste (CD&E). The London Plan apportions an amount of LACW and C&I waste to each borough and Westminster is required to have regard to these apportionment targets.
- 1.3 This Waste Data Study has been prepared to support Westminster's City Plan 2019-2040. In line with national policy, this evidence base looks at Westminster's need for all seven waste streams, including waste apportioned by the London Plan. It looks at the current waste management picture in the borough, where and how Westminster's waste is being managed.
- 1.4 This evidence base also identifies Westminster's waste need by identifying how much waste will need to be managed over the plan period, existing capacity and how waste will be managed in the future. It also identifies where Westminster's waste is exported to, and demonstrates agreement on the continued movements of waste through Statements of Common Ground.

## 2. Policy Context

- 2.1 This Waste Evidence Base and waste policies in The City Plan 2019-2040 need to comply with EU (at the time of writing), national, regional and local policies. These are set out below.

### Revised European Waste Framework Directive

- 2.2 Many of the policies and targets for waste originate from the European Commission (EC), in particular the Revised European Waste Framework Directive (rWFD) and the Circular Economy Package. The Government's Brexit White Paper (February 2017) confirmed that the current framework of environmental regulation set out in EU Directives will be transposed into UK law, although this position may change with the new administration.
- 2.3 Article 28 of the Waste Framework Directive 2008 sets out the requirement for each Member State to produce a Waste Management Plan. This plan must set out an analysis of the current waste management situation and sufficient information on the locational criteria for site identification and on the capacity of future disposal or major recovery

installations. These locational criteria are deferred to the Local Plans or Waste Plans of local authorities in the UK.

2.4 A published “Review of Waste Policy and Legislation” by the EC in 2015 resulted in a Circular Economy Package which introduced a range of higher targets for recycling and the phasing out of landfilling organic and recyclable materials. This review means that facilities for the management of waste in accordance with these new targets will be required and should be planned for as part of a Local Plan or waste plan. The London Environment Strategy has similar targets, such as recycling 65% of municipal waste by 2030, and these have been incorporated into the draft new London Plan.

### Localism Act

2.5 The Localism Act 2011 gave the responsibility for strategic planning back to local authorities acting individually. London is an exception to this and the Mayor has a responsibility for strategic planning through the London Plan, however waste planning is still the responsibility of individual Boroughs.

2.6 Section 110 of the Localism Act prescribes the “Duty to Co-operate” between local authorities in order to ensure that they work together on strategic issues such as waste planning. The duty is “to engage constructively, actively and on an on-going basis” and must “maximise the effectiveness” of all authorities concerned with plan-making. For matters such as waste planning, it is therefore important that local authorities can show that they have worked together in exchanging information and reaching agreement on where waste management facilities will be built.

2.7 Waste is a strategic cross-boundary issue and is subject to the duty to co-operate. This waste evidence base includes data on information on imports and exports of waste from Westminster to assist the borough with duty to co-operate engagement.

### Resources and Waste Strategy

2.8 The Government’s “Resources and Waste Strategy for England<sup>1</sup>” was published in December 2018, building on the recent “A Green Future: Our 25 Year Plan to Improve the Environment<sup>2</sup>” (January 2018). The overall strategy is to reduce the amount of waste produced, promote resource efficiency and move towards a circular economy.

2.9 There are a number of policy areas that could affect the amount and type of waste that local authorities have to plan for in the future. For example, producers paying for the disposal of their own packaging, a tax on plastic packaging which does not include 30% recycled content, deposit return schemes, streamlined recycling and food waste collection services, and greater efficiency of energy recovery facilities. The strategy is a 25 year plan and it remains to be seen how it will impact on how waste planning authorities plan for waste.

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<sup>1</sup> <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>

<sup>2</sup> <https://www.gov.uk/government/publications/25-year-environment-plan>

2.10 The Resources and Waste Strategy commits to reviewing the Waste Management Plan for England, National Planning Policy for Waste and the accompanying Planning Practice Guidance in 2019 to align national policies with the Resources and Waste Strategy. However, this timetable has slipped and the review will influence the next iteration of Westminster’s waste evidence base rather than this one.

2.11 The Resources and Waste Strategy acknowledges the deficiency in data on waste and commits to develop a new approach to collecting waste data, including a move away from weight-based targets towards impact-based targets. The timetable for this review is not yet known and it is unlikely to affect this waste evidence base.

### Waste Management Plan for England

2.12 The Waste Management Plan for England (2013) reflects the requirements of article 28 of the Revised European Waste Framework Directive (rWFD). It sets out how much waste is generated in England and how that waste is managed. It also includes an assessment of waste infrastructure needs in the future and measures to meet the obligations of the rWFD.

2.13 It states that waste planning authorities are responsible for producing waste plans to support the objectives of the Waste Management Plan for England. As noted above, the Resources and Waste Strategy commits to reviewing the Waste Management Plan for England in 2019 but this timetable may slip.

### National Planning Policy Framework

2.14 The National Planning Policy Framework (NPPF) was published in February 2019. An update to the plan-making section of the Planning Practice Guidance (PPG) was published in September 2018.

2.15 National planning policy for waste is dealt with in a separate document, but the NPPF sets out policies for plan-making which will influence the development of waste policies in Westminster’s Local Plan. Paragraph 31 states that “the preparation and review of all policies should be underpinned by relevant and up-to-date evidence” which should be “adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.” Paragraph 35 sets out the criteria against which Local Plans will be examined. These include:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

2.16 This waste evidence base focuses on meeting these requirements, including identifying Westminster’s objectively assessed waste management needs (positively prepared), identifying an appropriate strategy for Westminster’s waste (justified), identifying strategic waste exports from Westminster (effective) and ensuring conformity with waste policies (consistent with national policy).

2.17 The main policy requirement affecting waste in the NPPF and PPG is the requirement for planning authorities to produce statements of common ground to provide evidence of progress made through the duty to co-operate. Waste is a cross-border strategic issue that will need to be addressed in statements of common ground with relevant waste planning authorities. When assessing if the Local Plan is sound, the Inspector will look to statements of common ground (SoCG) for evidence that cross boundary strategic matters have been “dealt with rather than deferred” (NPPF 35) and that Westminster has complied with the duty to co-operate (DtC).

#### National Planning Policy for waste

2.18 The National Planning Policy for Waste<sup>3</sup> (NPPW), published in 2014, sets out the Government’s waste planning policies which all local planning authorities must have regard to when developing local waste plans. The NPPW is supplemented by the Planning Practice Guidance<sup>4</sup> (PPG) section on waste which provides further detail on how to implement the policies.

2.19 The NPPW requires planning authorities to prepare Local Plans which drive waste management up the waste hierarchy (see Figure 1 below).

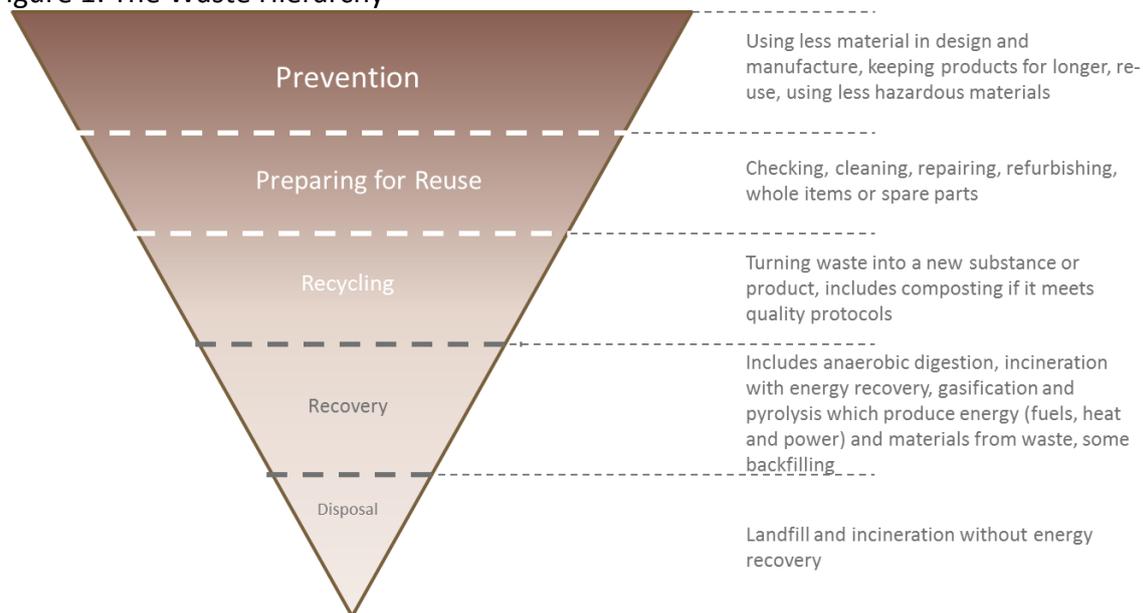
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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/364759/141015\\_National\\_Planning\\_Policy\\_for\\_Waste.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

<sup>4</sup> <https://www.gov.uk/guidance/waste>

Figure 1: The Waste Hierarchy



2.20 The NPPW sets out policies on data and analysis to underpin a proportionate evidence base, establishing the need for waste management facilities, and identifying suitable sites and areas to meet the need in local plans.

2.21 The NPPW states that waste planning authorities should have regard to their apportionments set out in the London Plan when preparing their plans. The NPPW requires that the waste evidence base for Local Plans should include:

- existing waste management capacity;
- waste arisings from within the planning authority area, including imports and exports;
- waste management capacity gaps in total and by particular waste streams;
- forecasts of waste arisings throughout the plan period; and
- waste management capacity required to deal with forecast arisings throughout the plan period.

2.22 This evidence base includes all these elements.

2.23 The NPPW requires information on existing waste management facilities to include:

- site location details – name of site and operator, address, postcode, local authority, grid reference etc.;
- type of facility – what process or processes are occurring on the site and which waste streams they manage;
- licence/permit details – reference number, tonnage restrictions, waste type restrictions, dates of renewal, etc and status if not yet licensed and permitted;
- capacity information – licensed and permitted throughput by waste type;

- site lifetime or maximum capacity – it is important to record the expected lifetime of facilities and, where appropriate, their total remaining capacity;
- waste sources – origin of wastes managed, broken down by type and location;
- outputs from facility – recovery of material and energy, production and export of residues and the destination of these, where appropriate; and
- additional information – potential of site for increasing throughput, adding further capacity, other waste management uses, etc.

2.24 Appendix D in this study includes this information.

2.25 NPPW and PPG require waste planning authorities to plan for seven waste streams. These waste streams are:

- Local Authority Collected Waste (LACW)<sup>5</sup> (apportioned by the London Plan)
- Commercial & Industrial waste (C&I)<sup>6</sup> (apportioned by the London Plan)
- Construction, Demolition & Excavation (CD&E)
- Low Level Radioactive waste (LLRW)
- Agricultural waste
- Hazardous waste
- Waste water

2.26 This report sets out existing capacity and discusses the plan for each waste stream.

2.27 The NPPW requires Local Plans to identify sufficient opportunities to meet the identified needs of their area for the management of waste streams. The London Plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the Plan. The London Plan requires boroughs to provide capacity through facilitating the maximum use of existing facilities. Both the NPPW and London Plan direct new waste facilities towards industrial locations. Section 7 of this report looks at land for new waste facilities in Westminster.

### National Planning Policy Statements

2.28 National Planning Policy Statements (NPS) comprise the Government's objectives for the development of nationally significant infrastructure in a particular sector and include any other policies or circumstances that ministers consider should be taken into account in decisions on infrastructure development. There are three relevant NPSs for waste: NPS for Renewable Energy (2011), NPS for Hazardous Waste (2013) and NPS for Waste Water (2012). There are no known plans to deliver a nationally significant facility for hazardous waste or waste water in Westminster.

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<sup>5</sup> Local Authority Collected Waste (LACW) comprises household waste and other waste collected by the council, such as street sweepings and municipal bins. This waste stream has historically been called 'Municipal' waste.

<sup>6</sup> Also known as business waste

## London Environment Strategy

- 2.29 The Mayor's Environment Strategy was published in May 2018. It contains ambitious targets for waste, including a new London-wide recycling target of 65% municipal (household and business) waste by 2030. This is an ambitious target for Westminster and the barriers to increasing household recycling rates in inner London boroughs are well known, for example the high proportion of flatted developments and low number of gardens. There is an expectation on Westminster, in its role as a waste collection and disposal authority, to produce a waste strategy setting out how it will make a meaningful contribution to meeting the Mayor's municipal waste targets set out in the Environment Strategy.
- 2.30 It is more difficult for Westminster to directly influence business recycling rates and therefore partnership working with the London Waste and Recycling Board will be key to increasing business waste recycling. A key element of increasing municipal waste recycling is to ensure there is sufficient space for the separation and storage of recyclables for collection and Westminster's [Recycling and Waste Storage Requirements](#) guidance will be an important tool.
- 2.31 The Mayor wants London to be a "zero waste city" which means no biodegradable or recyclable waste to landfill by 2026. A negligible amount of Westminster's LACW and C&I waste goes to landfill so the focus will be on diverting more recyclable CD&E waste away from landfill.

## London Plan

- 2.32 Westminster's City Plan and waste policy will need to be in general conformity with the London Plan. At the time of writing, the London Plan is the version published in March 2016.
- 2.33 However, a draft new London Plan was published for consultation in November 2017. The Mayor published early suggested changes to the Draft London Plan in August 2018. Further suggested changes to waste policies were published in March 2019 ahead of the oral examination hearings in front of a panel of Inspectors on waste held on 30<sup>th</sup> April 2019. Consolidated changes to the London Plan were published in July 2019 and included all previously suggested changes and any subsequent alterations as a result of the public hearings. The Panel of Inspectors' report was published in October 2019, and an 'Intend to Publish' London Plan was issued in December 2019.
- 2.34 The Panel Report does not recommend any further changes to waste policies beyond those already proposed in the 'consolidated changes' version of the draft new London Plan published in July 2019 and indeed no further changes are proposed in the 'Intend to Publish' version. The Secretary of State did not direct any changes to the waste policies in his letter to the Mayor of London of 13<sup>th</sup> March 2020. Some of the waste recycling targets in the London Plan 2016 have already been superseded by those in the Mayor's Environment Strategy. Given the advanced stage of the new London Plan, this waste

evidence base is aligned to the policies and targets contained in the 'Intend to Publish' London Plan (December 2019) rather than the London Plan (March 2016).

- 2.35 The London Plan (December 2019) states that London should manage as much of its waste within its boundaries as practicable, aiming to achieve waste net self-sufficiency by 2026 in all waste streams except for excavation waste. To meet this aim, the plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the plan and to plan for those waste streams not apportioned by the London Plan.
- 2.36 The London Plan incorporates targets set out in the Mayor's Environment Strategy, including London-wide target of 65% municipal (household and business) waste by 2030. This breaks down as 50% of LACW by 2025 and 75% of C&I by 2030. It also has targets of 95% reuse/recycling/recovery of construction and demolition waste (C&D) and 95% of excavation waste should be used for beneficial use.
- 2.37 The London Plan introduces a new requirement for referable applications<sup>7</sup> to include a "Circular Economy Statement" to set out how much waste the proposed development is expected to generate and where it will be managed. This will assist Westminster in monitoring these targets. Further guidance on the Circular Economy Statement is currently being developed. The London Plan supports boroughs who adopt lower thresholds for Circular Economy Statements in their Local Plans. However, The GLA has not yet issued any guidance on Circular Economy Statements. Further information, training and guidance will be available once the London Plan is published in 2020 and the policy is tested. Additional training and resources would be needed by Westminster's case officers to assess planning applications between the thresholds of 'major' and 'referable'. It is therefore recommended that this option is revisited after the policy on Circular Economy Statements has been put into practice by the GLA.
- 2.38 The requirement for boroughs to identify specific sites for new waste facilities has been replaced with "allocate sufficient sites, identify suitable areas, and identify waste management facilities" which updates the London Plan to be in accordance with National Planning Policy for Waste. There is a focus on Strategic Industrial Locations and Locally Significant Industrial Sites for new sites, but Westminster does not have any of this designated industrial land.
- 2.39 The London Plan makes clear that all existing waste sites should be safeguarded and retained in waste use. Existing waste sites are defined as those with planning permission for waste use or those with an Environment Agency permit. Site profiles for existing waste sites in Westminster is in Appendix D.
- 2.40 The London Plan requires compensatory capacity elsewhere in London if a waste site is redeveloped for another use. Compensatory capacity must be at or above the same level of the waste hierarchy of that which is lost, and that any loss of hazardous waste

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<sup>7</sup> Referable applications include those for developments providing 150 residential units, other types of development of 20,000sq.m in central London or 15,000sq.m outside Central London, developments 25m high adjacent to the Thames or 30m high elsewhere in London.

capacity must be replaced with hazardous waste capacity. Waste sites can only be released without re-providing capacity if it can be demonstrated that there is sufficient capacity elsewhere in London and the target of achieving net self-sufficiency is not compromised.

2.41 The London Plan requires boroughs with surplus capacity to share this with boroughs facing a shortfall in capacity before considering site release. The London Plan also acknowledges that it may not always be possible for boroughs to meet their apportionment within their boundaries and in these circumstances boroughs will need to agree the 'transfer of apportioned waste'. However, no further detail is provided on this.

2.42 Only capacity which "manages" waste can be counted towards Westminster's existing capacity. The London Plan states that waste is deemed to be managed if the following activities take place

- waste is used for energy recovery
- the production of solid recovered fuel (SRF), or it is high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition as a minimum<sup>131</sup> which is destined for energy recovery
- it is sorted or bulked for re-use (including repair and re-manufacture) or for recycling (including anaerobic digestion)
- It is reused, or recycled (including anaerobic digestion)

2.43 This Waste Evidence Base uses this definition to assess the existing capacity in Westminster.

2.44 Westminster is identified as a 'Retain Capacity' borough for industrial floorspace capacity. The 'Retain Capacity' boroughs should seek to intensify industrial floorspace capacity following the general principle of no net loss across designated SIL and LSIS. All boroughs in the Central Services Area fall within this category in recognition of the need to provide essential services to the CAZ and in particular sustainable 'last mile' distribution/logistics, 'just-in-time' servicing (such as food service activities, printing, administrative and support services, office supplies, repair and maintenance), waste management and recycling, and land to support transport functions.

2.45 Part G of London Plan Policy D4 Housing quality and standards requires housing to be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) food waste as well as residual waste.

#### Local Policies and Supporting Documents

2.46 Westminster's [City Plan: consolidated with changes since November 2013](#) was adopted in November 2016. Policy S44 deals with Sustainable Waste Management. The focus of the policy is waste minimisation and managing waste further up the waste hierarchy. In terms of sites, the policy identifies and protects existing waste and recycling facilities. These comprise street cleansing depots, micro-recycling centres and

in-vessel composters. The policy requires major new developments to provide recycling and composting waste management facilities. Policy S44 commits the council to identifying potential new locations suitable for waste management facilities during the lifetime of the City Plan and working in partnership with other London Boroughs to pool waste apportionment. The [Authority Monitoring Report 2017-2018](#) (June 2019) does not comment on the progress of this policy, but Defra figures show LACW recycling has increased from 14% in 2014 to 18.5% in 2018.

- 2.47 In 2017 Westminster decided to undertake a full review of the City Plan. The [City Plan 2019-2040](#) was prepared between 2017 and 2019. It contains Policy 38 on Waste Management which focuses on storage space for segregated waste in new developments, on-site waste management for developments that produce hazardous, medical and / or commercial catering waste, and protecting existing micro-recycling centres and cleansing depots.
- 2.48 The [Waste Evidence](#) paper (June 2019, updated November 2019) sets out the recent picture of waste generation in Westminster but does not identify future waste need over the plan period, nor does it identify how the London Plan's waste apportionment targets will be met. The paper provides a site search to identify land suitable for waste facilities, and concludes that no such land is available and deliverable.
- 2.49 The [Waste Topic Paper](#) (November 2019) covers similar content to the Waste Evidence paper. In addition it summarises Regulation 19 consultation responses on waste, in particular that of the Mayor who considers the draft City Plan waste policy to not be in general conformity with the London Plan because no formal agreement has been made with the relevant London waste planning authorities for Westminster (or the boroughs it is currently exporting to) to plan for its waste needs and allocate sufficient land to meet its apportionment requirements. While the Waste Topic Paper concludes that Westminster has addressed objections and general conformity issues through proposed modifications to Policy 38 and partnership working, it goes on to say that the council will prepare additional studies and continue to collaborate with partners to meet its strategic waste planning duties. This Waste Evidence Base is the culmination of that work.
- 2.50 Westminster have published [Recycling and Waste Storage Requirements](#) guidance for developers and architects which details the minimum physical space required for waste storage in the main types of development in Westminster. Storage for three types of waste are required: recyclables, organic waste and residual (black bag) waste.

### 3. Public Consultation on the City Plan 2019-2040 Waste Policy

- 3.1 Three public consultations took place on the City Plan 2019-2040. In June 2017 the council consulted on the scope of the City Plan full revision. Following this the council informally consulted on a full draft of a new City Plan (under Regulation 18) in November and December 2018. Then, Prior to submission to the Secretary of State, the council consulted on a Full Regulation 19 publication draft City Plan 2019 - 2040 in June and July 2019.

3.2 The City Plan 2019-2040 includes Policy 38 on waste management. Nine comments were received on the waste policy 38 at the Regulation 19 stage. Full representations can be found in [Regulation 19 Full Representations \(November 2019\)](#). The representors include the Mayor of London, the North London Boroughs, Environment Agency, Thames Water, neighbourhood fora and business organisations.

3.3 In addition to comments on the waste policy, there was support from a number of representors for reducing road freight by using sustainable transport methods of rail and water to move waste (Policies 32) and for consolidated on-site servicing, including waste (Policy 30).

3.4 The Table below summarises the representations made at the Regulation 19 consultation on Policy 38: Waste Management and sets out how Westminster are proposing to take them into account through modifications to the draft City Plan 2019-2040. Full details of the Minor Modifications proposed as a result of the Regulation 19 consultation can be found in [Schedule Of Proposed Minor Modifications To The Regulation 19 Publication Draft City Plan](#) (November 2019).

Table 3.1: Regulation 19 Representations on Policy 38: Waste Management

Representor	Comments	Proposed Modification
Mayor of London	<p>As stated previously, the Mayor welcomes Westminster’s focus on waste reduction and recycling, however, as acknowledged by the draft Plan, activities in Westminster generate significant amounts of waste. Table 9.1 of the draft new London Plan, forecasts that Westminster will generate more than twice the amount of household and commercial &amp; industrial waste than any other authority in London. However, the borough’s apportionment set out in Table 9.2 is relatively low, reflecting the local circumstance in Westminster.</p> <p>Westminster’s Waste Evidence Base June 2019 paper sets out that 67.2% of its waste is treated in London. However no formal agreement has been made with the relevant London waste planning authorities. To ensure London is net self-sufficient for waste management by 2026, Westminster</p>	<p>Modifications proposed to Policy 38 and supporting text as follows:</p> <p><u><a href="#">38D Developers are required to demonstrate through the Site Environment Management Plan and associated Site Waste Management Plan, the recycling, re-use, and responsible disposal of Construction, Demolition and Excavation waste in adherence with the council’s Code of Construction Practice.</a></u></p> <p><u><a href="#">38E The council will continue to collaborate with other London Local Authorities in the management of its waste apportionment target and monitor its arisings and capacity requirements.</a></u></p> <p>Para 38.2 <del>Our strategic focus is on waste reduction and recycling in the city.</del><u>In</u></p>

Representor	Comments	Proposed Modification
	<p>must plan for its apportionment through the measures set out in draft new London Plan Policy SI8. The draft Plan states that Westminster will work with local partners and other London boroughs to make arrangements to pool the waste apportionments set by the London Plan and to meet strategic waste planning duties. However, at the time of consultation no formal arrangements had been made for Westminster (or the boroughs it is currently exporting to) to plan for its waste needs and allocate sufficient land to meet its apportionment requirements, therefore Westminster's Plan cannot be in conformity with the current and draft London Plans.</p>	<p><u>accordance with the Government's emerging Resource and Waste Strategy and the Mayor's draft London Plan, these policies and strategies along with the NPPW, associated planning guidance and the Waste Management Plan for England</u> <del>commit the council to move waste up the waste hierarchy. We are committed to ensuring that waste is managed appropriately and efficiently in the city</del> Recent evidence has shown that Westminster has no capacity for new strategic waste management facilities and we will therefore protect existing waste management facilities and we will continue to monitor and research opportunities for new sites in Westminster. <del>We will work with local partners and other London boroughs to make arrangements to pool the waste apportionments set by the London Plan to meet our strategic waste planning duties.</del></p> <p>(Part of para 38.2 renumbered) <u>38.5</u> We will <u>continue to</u> work with <del>local partners and</del> other London boroughs <u>and the GLA</u> to <del>make formalise current</del> arrangements to pool the council's waste apportionment set by the London Plan <del>to meet our strategic waste planning duties.</del> <u>The council will shortly be carrying out a Waste Data Study to provide an understanding of the profile of the borough's waste arisings and capacity required to inform</u></p>

Representor	Comments	Proposed Modification
		<p><u>apportionment pooling. To date, the council has been managing the majority of its waste via facilities in Southwark, Lewisham and Greenwich - rolling tonnage of 160ktps, already 84% of the Draft London Plan's apportionment. The council also uses facilities within Hammersmith and Fulham/OPDC area and understands that this site will be redeveloped for residential and commercial at some point in the future. Along with other London boroughs using this facility, the council will collaborate to address the resultant capacity shortfall.</u></p>
North London Boroughs	<p>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</p> <p>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.</p> <p>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.</p> <p>4. The policy does not show how Westminster is planning to meet its</p>	<p>Modifications proposed to Policy 38 supporting text as follows:</p> <p>Para 38.3 Developments should provide adequate waste management facilities that are fully integrated into the design of the scheme. <u>The council's Recycle and Waste Storage Requirements guide – Apr 2019, provides applicants with guidance on how it expects this to be done including the installation of balers and compactors within the development as required. This also supports the requirements for</u> the amalgamation of facilities <del>in an area may be required</del> in locations that demand an area specific approach to waste management. cont...</p>

Representor	Comments	Proposed Modification
	<p>apportionment under the London Plan.</p> <p>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.</p> <p>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.</p> <p>7. What is an “easy to use waste streaming facility” and where can these be found in Westminster?</p> <p>8. What are the means by which waste will be reduced in Westminster (as in para 34.10)?</p>	<p><u>38.4 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 for 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.</u></p> <p>(Part of para 38.2 renumbered)</p> <p><u>38.5 We will continue to work with local partners and other London boroughs and the GLA to make formalise current arrangements to pool the council’s waste apportionment set by the London Plan to meet our strategic waste planning duties. The council will shortly be carrying out a Waste Data Study to provide an understanding of the profile of the borough’s waste arisings and capacity required to inform apportionment pooling. To date, the council has been managing the majority of its waste via facilities in Southwark, Lewisham and Greenwich - rolling tonnage of 160ktps, already 84% of the Draft London Plan’s apportionment. The council</u></p>

Representor	Comments	Proposed Modification
		<p><u>also uses facilities within Hammersmith and Fulham/OPDC area and understands that this site will be redeveloped for residential and commercial at some point in the future. Along with other London boroughs using this facility, the council will collaborate to address the resultant capacity shortfall.</u></p> <p><u>38.6 Agricultural waste is composted in the City's Royal Parks together with agricultural waste imports from other boroughs and no additional capacity is required for such waste. The City of London Corporation provides a Hazardous Waste Collection and Disposal Service, HWCDS, to London residents in all London Boroughs (except of Hillingdon). Waste water treatment is addressed by Thames Water through the upgrade and expansion of the Beckton Sewage Treatment Works as part of the Thames Tideway Tunnel scheme and there is little or no waste arising from low level radioactive so no additional facilities are required for these waste streams.</u></p>
Heart of London Business Alliance	<p>38. We welcome the need for developments to take account of their waste management requirements. However, as above, the development of an area-wide plan would better reflect the objectives of the environmental quality policy.</p> <p>We welcome policies to support and encourage responsible</p>	Comments passed to the Waste and Cleansing Team.

Representor	Comments	Proposed Modification
	<p>deliveries, waste management and recycling. While the City Plan has specific policies on freight, we suggest these can be enhanced by adding a provision stating that major developments are required to participate in a waste, recycling, business deliveries and personal deliveries, consolidation or preferred supplier scheme, where one exists in the area.</p>	
<p>Environment Agency</p>	<p>It is concerning to see that the growth policies set out in the City Plan are not supported by evidence to suggest that enough wastewater infrastructure would be provided in time to accommodate the growth proposed.</p>	<p>A new paragraph has been proposed as follows:</p> <p><u><a href="#">Agricultural waste is composted in the City's Royal Parks together with agricultural waste imports from other boroughs and no additional capacity is required for such waste. The City of London Corporation provides a Hazardous Waste Collection and Disposal Service, HWCDS, to London residents in all London Boroughs (except of Hillingdon). Waste water treatment is addressed by Thames Water through the upgrade and expansion of the Beckton Sewage Treatment Works as part of the Thames Tideway Tunnel scheme and there is little or no waste arising from low level radioactive so no additional facilities are required for these waste streams.</a></u></p>
<p>New West End Company</p>	<p>We welcome the principle of Policy 38 on waste management but would welcome more detail and guidance on the scale of facilities and whether composting can be provided at the neighbourhood or District level.</p>	<p>Recommendation in section 9 of this report for policy to include guidance on new facilities.</p>

Representor	Comments	Proposed Modification
Knightsbridge Neighbourhood Forum	The Forum supports WCP Policy 38 ('Waste management') but considers it important that clause A makes reference to 'recycling' as well as waste storage. Recycling material is collected and managed by the waste authority and in this regard, it is important that it is identified as a particular stream of waste management. This should be complemented by reference to 'recycling' in clause G of WCP Policy 7 ('Managing development for Westminster's people').	Further modification suggested to 38.3:  Developments should provide adequate waste management facilities that are fully integrated into the design of the scheme. <a href="#">The council's Recycle and Waste Storage Requirements guide – Apr 2019, provides applicants with guidance on how it expects this to be done including the installation of balers and compactors within the development as required. This also supports the requirements for</a> the amalgamation of facilities <del>in an area may be required</del> in locations that demand an area specific approach to waste management. cont...
Church Street Ward Neighbourhood Forum + an individual	The 'in-vessel-composter' in Church Street (p.143), still marked with a blue dot, is long defunct and should serve as a reminder to refocus policy on waste-to-energy schemes.	Figure 33 to be updated
Thames Water	There is no policy within the City Plan in relation to water and wastewater infrastructure. As set out in our response to the draft City Plan, in order to ensure that any water and wastewater infrastructure is delivered ahead of the occupation of development it is considered that policy support should be provided. If development is delivered ahead of the delivery of any necessary water or wastewater network upgrades necessary to provide capacity within the networks there could be adverse impacts such as sewer flooding, pollution of land or watercourses	A new paragraph has been proposed as follows:  <a href="#">Agricultural waste is composted in the City's Royal Parks together with agricultural waste imports from other boroughs and no additional capacity is required for such waste. The City of London Corporation provides a Hazardous Waste Collection and Disposal Service, HWCDS, to London residents in all London Boroughs (except of Hillingdon). Waste water treatment is addressed by Thames Water through the</a>

Representor	Comments	Proposed Modification
	<p>and problems of low/no water pressure.</p> <p>It is therefore suggested that the following policy and supporting text is included in the City Plan.</p> <p>Policy: “Where appropriate, planning permission for developments which result in the need for off-site upgrades to the water or sewerage network, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</p> <p>Supporting Text: “The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</p> <p>This could be included in a standalone policy on water and wastewater infrastructure or incorporated into existing policies such as Policy 32 (in relation to avoiding the risk of sewer flooding). The inclusion of the policy would ensure that the City Plan is consistent with the NPPF 2019</p>	<p><u>upgrade and expansion of the Beckton Sewage Treatment Works as part of the Thames Tideway Tunnel scheme and there is little or no waste arising from low level radioactive so no additional facilities are required for these waste streams.</u></p>

Representor	Comments	Proposed Modification
	<p>which states in paragraph 122 that: “Planning policies and decisions should support development that makes efficient use of land, taking into account:...c) the availability and capacity of infrastructure and services – both existing and proposed...”</p> <p>It is acknowledged that paragraph 7.6 of the City Plan relates to infrastructure and states that the Council will work with applicants and infrastructure providers. In order to assist with ensuring that development is aligned with any necessary upgrades to the water and wastewater networks it would be beneficial for the text to also advise developers/applicants to engage at an early stage with Thames Water to discuss the infrastructure requirements of their development. This approach can help to reduce the need for phasing conditions to be sought and can help ensure that development is aligned with any necessary supporting water and wastewater infrastructure upgrades,</p> <p>In addition to the above policy wording it would also be beneficial for a policy to be provided supporting the delivery of new infrastructure development. Such wording could be along the lines of: “The development or expansion of water and wastewater facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and wastewater management, provided that the need for such facilities outweighs any adverse</p>	

Representor	Comments	Proposed Modification
	land use or environmental impact and that any such adverse impact is minimised.”	
Northbank BID	38. Waste: The BID recognises the need for waste management facilities but would like to request a review of the micro recycling centres in the Northbank area as they attract anti social behaviour, are on busy pedestrian routes and are frequently reported to Westminster’s ‘Report It’ for issues.	Comments passed to the Waste and Cleansing Team.
West End Partnership	<b>Policy 38. Waste</b> is supported but should set out more explicitly a commitment to working towards a circular economy.	Recommendation in section 9 of this report for policy to include reference to circular economy and London Plan targets.

3.5 In their [Note No 1 From The Appointed Inspectors To Westminster City Council](#) (December 2019), the Inspectors appointed to examine the City Plan 2019-2040 state that the changes to the waste policy appear to constitute Main Modifications (MM) rather than minor modifications (mm) because they address issues of soundness and general conformity.

3.6 This Waste Evidence Base also recommends a number of additional changes to Policy 38: Waste Management in light of its findings and progress on meeting apportionment targets and the duty to co-operate on waste exports. These recommendations are set out in section 9. Therefore, Policy 38 and the proposed modifications set out in Table 3.1 will be subject to further change.

3.7 In addition to proposed changes to Policy 38 and the supporting text, statements of common ground have been agreed with both the Mayor of London and the North London Boroughs to agree that the approach recommended in this Waste Evidence Base satisfies the objections to the City Plan waste policy. These statements of common ground are set out in Appendix A.

## 4. Waste Arisings in Westminster

4.1 Westminster is required to plan for the management needs of the borough, contributing towards the target of net self-sufficiency in London by 2026. There are seven waste streams, which includes waste from households, businesses and construction. Waste arisings vary from year to year.

## Local Authority Collected Waste

4.2 In 2018 Westminster produced just over 110,000 tonnes of local authority collected waste (LACW)<sup>8</sup>. This was made up of around 91,000 from households and 19,000 tonnes of ‘trade’ waste collected by Westminster from locations such as household recycling centres, street sweepings, gully emptyings, public bins, and civic buildings. Westminster also collects waste from businesses (around 84,000 tonnes in 2018). This is reported in LACW figures but has been excluded here because for the purposes of this data study it has been included in the Commercial and Industrial (C&I) waste arisings figures (see Appendix B). Table 4.1 includes all reported figures for completeness.

Table 4.1: Westminster’s LACW management routes 2014/15-2018/19

	2018/19
Total LACW	110,233
Household waste	91,076
Non-household ‘trade’ waste	19,157
Total Reported Non-household Waste	103,193
Total Reported LACW	194,269
LACW sent for recycling-composting-reuse	36,204 (18.5%)
LACW not sent for recycling	158,065

Source: WasteDataFlow

4.3 Westminster exports all of its LACW. Mixed recyclables are taken to the Integrated Waste Management Facility in Southwark to be sorted before their onward journey to be reprocessed into new products. Segregated recyclate, including food waste, goes to facilities in London, Kent, Essex and Northamptonshire. 18.5% of Westminster’s Local Authority Collected Waste was recycled in 2018. Residual (“black bag”) waste is taken to the South East London Combined Heat & Power facility in Lewisham to be turned into energy.

## Commercial and Industrial Waste

4.4 Commercial and Industrial (C&I) waste arisings is notoriously difficult to calculate. There are two main methodologies to estimate C&I waste arisings and the results of both are set out below.

4.5 The London Plan waste evidence base<sup>9</sup> uses the 2009 Survey methodology. The Report states:

*Defra 2009 survey was co-funded by the London Waste and Recycling Board (LWaRB). The Defra 2009 survey quantifies C&IW arisings for each of London’s commercial and industrial sectors, as well as providing estimates of the borough level contribution to the C&IW total. As per findings of the previous review of C&IW data undertaken for the FALP, it is concluded that Defra’s 2009 C&IW survey remains the*

<sup>8</sup> Source: WasteDataFlow

<sup>9</sup> [London Plan Waste Forecasts and Apportionments: Task 1 – GLA Waste Arisings Model Critical Friend Review](#) (SLR, March 2017)

*most robust and fit for purpose source of baseline waste data for London Plan forecasts.*

- 4.6 This report estimates that Westminster generates around 620,000 tonnes of C&I waste per annum.
- 4.7 The second methodology<sup>10</sup> is based on the methodology originally developed in 2014 by Jacobs for Defra but extensively modified following consultations with the industry. It uses publicly available data including the WDI, HWDI, Incinerator Returns and list of exempt sites. While this methodology is to enable Defra to complete EU returns, the methodology can be adapted and used in the preparation of local plans. The assumptions and figures are set out in full in Appendix B.
- 4.8 The amount of C&I waste arising in Westminster in 2018 using the WDI methodology is 153,860 tonnes.
- 4.9 There is a big difference in the results of the two different methodologies for calculating C&I waste arising in Westminster. The problems with estimating C&I arisings is an issue for all waste planning authorities, not just Westminster.
- 4.10 However, for the purposes of waste planning in Westminster, it is not crucial to know how much C&I waste is generated because the London Plan apportionment target replaces 'need' for both C&I and LACW waste streams. The London Plan apportions 100% of London's LACW and C&I waste arisings to each borough based on the ability of each borough to provide waste capacity. If every borough provides capacity to meet their apportionment targets then London will be net self-sufficient for managing C&I and LACW. Westminster's apportionment target (200,000 tonnes by 2041) is well below the estimated arisings but this is what Westminster is required to plan for, rather than the arisings.

### **Construction, Demolition and Excavation Waste**

- 4.11 The amount of Westminster's Construction, Demolition and Excavation (CD&E) waste varies from year to year<sup>11</sup> reflecting development taking place across the City. As with C&I waste, estimating the amount of CD&E waste is difficult because it relies on waste carriers accurately recording the origin of the waste. The main source of waste data is the Waste Data Interrogator and, as well as data for waste originating in Westminster, very large amounts of waste are recorded as coming from 'Central London'. Although it is not possible to say how much 'Central London' waste arises in Westminster, it seems likely that at least some of it should be attributed to Westminster.

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<sup>10</sup> [Commercial and Industrial waste Arisings Methodology Revisions for England](#), October 2018, Defra/ Government Statistical Service

<sup>11</sup> Source: Waste Data Interrogator

4.12 In order to estimate the amount of CD&E waste generated in Westminster, the Waste Data Interrogator was used to gather inputs<sup>12</sup> to permitted facilities. Usually, this methodology makes an adjustment to waste inputs to intermediate sites (eg transfer) within the same administrative area, but as all of Westminster’s arisings are exported, this is not considered necessary. CD&E waste with the origin of Westminster and ‘Central London’ and managed at licenced facilities is set out in Table 4.2. Hazardous waste has not been removed from the total as the proportion is very small.

Table 4.2: CD&E waste managed through licenced facilities

Management Route	2014	2015	2016	2017	2018
<b>All C&amp;D (origin Westminster)</b>	<b>67,812</b>	<b>79,297</b>	<b>100,788</b>	<b>54,861</b>	<b>49,197</b>
Landfill	5,518	590	4,405	10,692	7,931
Recovery to Land	0	0	0	2,119	0
Transfer	48,141	39,130	28,304	22,354	25,134
Treatment	14,162	39,567	68,052	19,694	16,052
Metal Recycling Sites	0	10	27	2	79
<b>All C&amp;D (‘Central London’)</b>	<b>28,239</b>	<b>35,227</b>	<b>92,485</b>	<b>72,503</b>	<b>23,510</b>
Landfill	9,905	9,913	107	462	47
Recovery to Land	2,083	10,238	13,624	1,821	825
Transfer	10,974	24,698	79,876	13,687	13,145
Treatment	5,192	263	1,223	1,567	9,493
Metal Recycling Sites	107	406	3	123	0
<b>All Excavation (origin Westminster)</b>	<b>240,968</b>	<b>149,035</b>	<b>277,764</b>	<b>285,813</b>	<b>139,540</b>
Landfill	21,216	13,745	33,136	81,176	84,801
Recovery to Land	65,800	27,906	0	21,511	20,067
Transfer	152,319	103,147	237,362	179,485	28,397
Treatment	1,634	4,238	7,266	3,640	6,274
Metal Recycling Sites	0	0	0	0	0
<b>All Excavation (‘Central London’)</b>	<b>836,576</b>	<b>485,356</b>	<b>811,334</b>	<b>1,542,793</b>	<b>954,564</b>
Landfill	62,602	172,696	218,264	111,715	168,966
Recovery to Land	773,293	307,400	500,996	1,178,570	603,326
Transfer	444	5,260	92,007	252,381	181,755
Treatment	237	0	66	127	517
Metal Recycling Sites	0	0	0	0	0

Source: Waste Data Interrogator 2014-2018

4.13 Table 4.2 shows that Westminster is not yet meeting the London Plan target of 95% recycling of C&D waste. The London Plan also has a target of 95% beneficial use if excavation waste. The table shows some beneficial use (recovery to land) but a significant amount of excavation waste is going to landfill, and it is not clear if this waste is also being put to beneficial use such as restoration as this is difficult to measure.

4.14 It is likely that much of the excavation waste identified as arising in and categorised as ‘Central London’ is from the major infrastructure projects such as Crossrail. Table 4.2

<sup>12</sup> This data includes EWC Chapter 17 (Construction & Demolition Waste), and EWC codes 19 12 09 (minerals such as sand, stones) and 20 02 02 (soil and stones). Excavation waste is EWC code 17 05 04 and C&D waste is the remainder.

shows that a substantial proportion of this waste is put to beneficial use (recovery to land) which supports this hypothesis as each major infrastructure project has a management strategy in place to re-use a very high proportion of excavated materials.

4.15 In addition to licenced facilities, CD&E waste is managed at exempt facilities. Exempt facilities still need to register their operations with the Environment Agency but are not required to report their throughput, so assumptions are required to estimate their capacity. Westminster has two exemptions which manage a total of 1,200 tonnes of waste annually. Further details of assumptions made are set out in Table 6.2.

4.16 With the exception of CD&E material which is recycled and reused on site, and the very small amount managed at exempt facilities, all of Westminster's CD&E waste is exported.

### **Hazardous waste**

4.17 Hazardous waste is a component part of the other waste streams. Arisings vary each year but have been between 7,800 tonnes and 26,500 tonnes over the last five years<sup>13</sup>. Hazardous waste arising in Westminster is exported to specialist facilities outside London.

### **Other waste streams**

4.18 A small amount of low level radioactive waste arises in Westminster, mainly from institutions like hospitals and research and development facilities. No additional capacity is needed to manage this waste stream.

4.19 There is no agricultural waste arising in Westminster, except that which arises and is managed within the Royal Parks. No additional capacity is needed to manage this waste stream.

4.20 Westminster's wastewater and sewage sludge is treated at the sewage treatment works in Beckton, in the London Borough of Newham. Thames Water are planning to upgrade Beckton Sewage Treatment Works from spring 2020 to increase capacity to provide wastewater management for an increasing population.

## **5. Westminster's waste need**

### **LACW and C&I waste need**

5.1 The London Plan sets out anticipated household and business waste arisings in each London borough (Table 9.1). The London Plan apportions an amount of this waste arising across London to each borough based on a methodology set out in an [evidence base report](#) by SLR/LUC. The draft apportionment targets for Westminster are lower

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<sup>13</sup> Source: Hazardous Waste Data Interrogator 2014-2018 (hazardous waste recorded as arising in Westminster)

than the waste expected to be generated by the borough. The figures for 2026-2036 are not provided in the draft new London Plan or evidence base documents and have been estimated based on proportions of waste arisings.

5.2 The NPPW states that “In London, waste planning authorities should have regard to their apportionments set out in the London Plan when preparing their plans”. The London Plan requires boroughs to “allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste”. Therefore Westminster needs to plan to meet the London Plan waste apportionment targets rather than waste arisings.

5.3 Westminster’s apportionment targets are:

Table 5.1: Westminster’s Apportionment Targets

Waste stream	2021	2026	2031	2036	2041
Apportionment (LACW and C&I) <sup>14</sup>	188,000	190,000	192,000	196,000	200,000

Source: London Plan (December 2019)

5.4 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). 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.

5.5 The London boroughs of Bexley, Bromley, Lewisham, Greenwich and Southwark and the City of London work collectively to prepare a Joint Waste Planning Technical Paper to demonstrate how waste apportionment targets set by the London Plan will be met. Bexley has agreed to Westminster joining the Southeast London waste planning group to pool apportionment targets and plan for waste collectively in the future, subject to formal agreement from the group.

5.6 This arrangement with Bexley means that Westminster can demonstrate that its waste apportionment targets are being met and the City Plan is therefore in conformity with the London Plan. Policy 38 and the supporting text should be amended to reflect this arrangement.

## CD&E waste need

<sup>14</sup> Apportionment targets in the London Plan are provided for 2021 and 2041 only. The figures for years 2026, 2031 and 2036 have been estimated using Westminster’s apportionment share of 2.3% of the overall waste arisings in London set out in Tables 2-2 and 3-3 of the [London Plan Waste Forecasts and Apportionments Task 1 – GLA Waste Arisings Model Critical Friend Review](#), SLR (March 2017)

5.7 The methodology for calculating C&D waste arisings is set out in paragraph 33 of the Planning Practice Guidance. It states “Waste planning authorities should start from the basis that net arisings of construction and demolition waste will remain constant over time” and goes on to say that any significant planned regeneration or major infrastructure projects over the timescale of the Plan may be relevant.

5.8 Westminster has no significant planned increase in development over the plan period; the level of development currently taking place in the City will continue. The draft City Plan includes a target of 1,495 new homes each year over ten years. This is more than the London Plan new home target for Westminster of 985 new homes each year over ten years in the ‘Intend to Publish’ London Plan (December 2019). This target has been revised down from the target of 1,010 in the Draft London Plan (consolidated with changes July 2019) in light of recommendations in the Inspectors’ Report.

5.9 Recent housing completions are set out in Westminster’s Authority Monitoring Report. These are set out in Table 5.2.

Table 5.2: Westminster’s Net Residential Unit Completions 2014/15 - 2017/18

Westminster	2014/15	2015/16	2016/17	2017/18
Housing completions	925	1,035	1,519	1,163

Source: Westminster’s Authority Monitoring Report 2018

5.10 The London Plan housing targets fall within a similar range with recent completions if net completions are in line with London Plan targets, it is likely that C&D waste arisings will also remain within a similar range. If the higher City Plan targets are achieved, C&D arisings may increase. CD&E arisings have not been ‘constant’ over recent years, so Table 5.3 below shows an average across 2014-2018 and projects these over the City Plan period.

Table 5.3: Average Westminster CD&E arisings from 2014-2018 projected over the City Plan period

Waste stream	2021	2026	2031	2036	2041
C&D (origin Westminster)	70,391	70,391	70,391	70,391	70,391
Excavation (origin Westminster)	218,624	218,624	218,624	218,624	218,624
<b>Total (origin Westminster)</b>	<b>289,015</b>	<b>289,015</b>	<b>289,015</b>	<b>289,015</b>	<b>289,015</b>

5.11 Another source for CD&E waste projections in the Local Aggregate Assessment (LAA) for London<sup>15</sup>. Figure 2 of the LAA sets out Forecasts of CD&E Waste in London. The figure for Westminster is shown in Table 5.4 below.

Table 5.4: LAA Forecasts of CD&E Waste in London

	2021	2026	2031	2036
Westminster	205,000	210,000	214,000	219,000

<sup>15</sup> At the time of writing, the most up to date [Local Aggregate Assessment for London](#) is from July 2018.

5.12 The LAA CD&E projections are below the average CD&E projections based on the WDI methodology, but above the 2018 CD&E waste arisings figure of 188,737. As CD&E waste arisings differ from year to year, sometimes significantly, the projection for waste arisings originating in Westminster is between 190,000 and 290,000 tonnes per annum. However, this doesn't take account of waste originating in 'Central London', some of which probably arose in Westminster. Therefore the top end of this range (290,000 tonnes per annum) is the most appropriate option.

## Hazardous waste

5.13 All the waste streams include some hazardous waste. All hazardous waste arising in Westminster is exported to be treated at specialist facilities which have a wide catchment area. Due to their specialist nature, planning for hazardous waste facilities is a strategic (regional) issue and Westminster will co-operate with the Greater London Authority on this.

## Other waste streams

5.14 There is no identified need for new capacity for agricultural or low-level radioactive waste. Thames Water are planning to upgrade Beckton Sewage Treatment Works to increase waste water capacity.

# 6. Existing Sites and Capacity

6.1 Waste capacity in Westminster is very small. It comes from two main sources; existing capacity from operational licenced and exempt waste facilities. No new waste facilities are currently planned in Westminster.

6.2 There are three existing licenced waste sites in Westminster and these sites are listed in Table 6.1. The table also includes the type of waste managed at each facility and the capacity which is the maximum throughput each site has achieved over the last five years. More details on these sites are provided in the Site Profiles in Appendix D.

Table 6.1: Operational waste sites in Westminster with maximum throughput capacity

Site Name	Address	Facility Type	Input Waste type(s)	Capacity (tonnes)
Buckingham Palace	London SW1A 1AA	Composting	HIC	648
Kensington Gardens Leaf Pen	The Magazine Store Yard, Kensington Gardens, London W2 2UH	Composting	HIC	2,657

Site Name	Address	Facility Type	Input Waste type(s)	Capacity (tonnes)
Regents Park Leaf Yard	The Store Yard, Inner Circle, Regents Park, London NW1 4NR	Composting	HIC	629
<b>Total</b>				<b>3,286</b>

6.3 Exempt sites are waste facilities not requiring Environment Agency permits to operate. Exempt waste facilities are ancillary to the main business operation, for example London Zoo undertakes sorting and baling of material before transporting it to another site for recycling.

6.4 There is no requirement to report the amount of waste being managed at an exempt facility so an estimate needs to be made using the register of exempt facilities. The methodology for doing this is set out in Defra's "[New Methodology to Estimate Waste Generation by the Commercial and Industrial Sector in England](#)" published in 2014.

6.5 Exemptions are classified under a range of 57 paragraph descriptions categorised as U (use of waste), T (treatment of waste), D (disposal of waste) and S (storage of waste). For the purposes of this study, only exempt facilities which 'manage' waste rather than store it are of interest.

6.6 A full list of exempt waste facilities in Westminster is set out in Appendix E. The list does not include storage facilities which do not manage any waste. A summary of Westminster's assumed exemptions capacity for C&I and C&D waste is provided in Table 6.2 below.

Table 6.2: Assumed capacity at Westminster's exempt sites

Paragraph No.	Description	Number of exemptions	Assumed capacity for each exemption
D7	Burning plant tissue and untreated wood wastes in the open	3	10 tpa
T4	Preparatory treatments (baling, sorting, shredding etc	4	5,000 tpa
T6	Treatment of waste wood and waste plant matter by chipping, shredding, cutting or pulverising	7	2,000 tpa
T9	Recovery of scrap metal	1	2,500 tpa
T23	Aerobic composting and associated prior treatment	2	400 tpa
U11	Spreading waste on non-agricultural land to confer benefit	2	200 tpa
U12	Use of mulch	6	600 tpa

Paragraph No.	Description	Number of exemptions	Assumed capacity for each exemption
<b>Total assumed C&amp;I waste capacity at exempt facilities</b>			<b>41,330</b>
U1	Use of Waste in Construction	2	600tpa <sup>16</sup>
<b>Total assumed C&amp;D waste capacity at exempt facilities</b>			<b>1,200</b>

6.7 Westminster's existing waste management capacity is summarised in the table below.

Table 6.3: Existing waste management capacity in Westminster

Source	LACW/C&I capacity	C&D capacity
Existing licenced waste sites	3,934	0
Exempt waste sites	41,330	1,200
<b>Total</b>	<b>45,264</b>	<b>1,200</b>

## 7. Land for New Waste Management Capacity

7.1 There is a significant gap between existing waste management capacity in Westminster and the City's need for capacity to manage waste generated in its area.

7.2 London Plan Policy S18 requires boroughs to provide capacity by maximise existing waste sites, identifying Strategic Industrial Locations and Locally Significant Industrial Sites as suitable locations for new facilities, and safeguarding wharves with an existing or future potential for waste.

7.3 Westminster has no existing waste sites suitable for intensification and does not have any Strategic Industrial Locations, Locally Significant Industrial Sites or wharves for new facilities. A site search<sup>17</sup> carried out in 2019 identified no sites in Westminster for new waste facilities which are suitable or deliverable. No new waste facilities are known to be coming forward in Westminster. This means that Westminster has to plan on the basis that, unless a waste facility comes forward on a windfall site, the City's will continue to rely on waste facilities outside its administrative boundaries. Waste exports are examined in detail in section 8.

## 8. Waste Exports and Imports

8.1 Westminster exports almost all its waste to be managed because its waste capacity needs cannot be met within the authority area. Local planning authorities have a duty

<sup>16</sup> Estimate based on analysis in Table 2.4 of [Review of the Factors Causing Waste Soil To Be Sent To Landfill; 2007 to 2011](#) (WRAP, 2013)

<sup>17</sup> Details on the site search are set out in the [Waste Evidence](#) document (November 2019)

to cooperate with each other on strategic matters that cross administrative boundaries. Exports of waste from one waste planning authority to another is a strategic cross-boundary matter and is an important consideration in assessing the effectiveness of the City Plan. It is therefore important to understand the destination of Westminster’s waste exports.

## Summary of waste exports

8.2 The primary sources of data on waste exports is the Environment Agency’s Waste Data Interrogators (WDIs) and Incinerator Returns. The data sources include information about the amount of waste received at a particular site and the origin of that waste. However, the accuracy of this data is not perfect and the limitations are well known, as mentioned above. Notwithstanding this, these are the best available data sources for movements of waste and are used as the starting point for co-operation with other waste planning authorities receiving Westminster’s waste.

8.3 Table 8.1 summarises the type of waste recorded by the Waste Data Interrogator (WDI), the Hazardous Waste Data Interrogator (HWDI) and the Incinerator Returns as being exported from Westminster over the last five years.

Table 8.1: Recorded exports from Westminster by waste type 2014-2018 (all waste streams)

Waste type	2014	2015	2016	2017	2018
LACW/C&I (WDI and IR)	174,328	169,648	169,780	160,352	166,482
CDE (WDI)	240,968	149,035	277,764	285,813	139,540
Hazardous (WDI)	412	346	506	6,520	896
Hazardous (HWDI)	26,506	8,676	9,552	9,797	7,880

Source: Waste Data Interrogator, Hazardous Waste Data Interrogator and Incinerator Returns 2014-2018

8.4 Data for local authority collected waste (LACW) are also collected by local authorities and collated by Defra so it is possible to gather more information on this waste stream and combine this with knowledge about where it is managed to support duty to co-operate discussions. However, information on movements of C&I and CD&E waste relies on the WDI and Incinerator Returns and it is acknowledged that not all waste exported from Westminster (and shown in the tables below) is captured by this data source.

8.5 The government publishes annual reports on local authority collected waste<sup>18</sup> (LACW) and this data can be used to understand more about where this waste stream is managed. Table 8.2 shows how much LACW is recycled and how much is not recycled.

Table 8.2: LACW management 2014/15-2018/19 (tonnes)

	2014/15	2015/16	2016/17	2017/18	2018/19
LACW sent for recycling-composting-reuse	26,763 (14%)	30,232 (15.5%)	31,029 (16%)	31,899 (17%)	36,204 (18.5%)

<sup>18</sup> [Statistical data set ENV18 - Local authority collected waste: annual results tables](#)

LACW not sent for recycling	161,879	164,635	162,071	154,933	158,065
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Source: [ENV18: Local authority collected waste: annual results tables](#) - Local authority collected waste generation from April 2000 to March 2019 (England and regions) and local authority data April 2018 to March 2019 (Table 1)

8.6 A specific example of the limitations of the WDI pertinent to Westminster is that Defra data for 2018 (Table 8.2) shows 36,000 tonnes of Westminster's LACW was recycled. However, this amount of waste originating in Westminster and going to recycling facilities is not accounted for in the WDI. This might be because it has been recorded as originating in 'Central London' or a similar category which doesn't attribute waste to a particular waste planning authority.

8.7 Westminster's residual LACW is managed at SELCHP Energy from Waste facility in Lewisham and recyclables are sorted at the Integrated Waste Management Facility in Southwark. It can therefore be assumed that the 'non-recycled' figures in Table 8.2 are approximately the amount of waste managed at SELCHP and the 'recycled' figure is the amount sent to the Integrated Waste Management Facility.

8.8 London Plan policy SI8 requires the equivalent of 100% of London's waste to be managed within London (i.e. net self-sufficiency) by 2026. This target for London's net self-sufficiency does not include excavation waste.

8.9 Table 8.3 uses WDI and Incinerator data to show how much of Westminster's LACW/C&I and C&D waste exports were managed within and outside of London. It should be noted that where waste is taken to a transfer station, it is not always possible to identify its onward destination due to the limitations of the WDI.

8.10 Table 8.3 shows that while the majority of LACW and C&I waste is being exported from Westminster to be managed within London, the picture for C&D waste is less clear. The majority of C&D waste goes to transfer facilities within London in the first instance, and it is likely that these facilities will recycle some of this C&D waste. However, some C&D waste may be sent on to destinations outside London.

Table 8.3: Exports by waste stream and destination 2014-2018

Destination facility type		2014	2015	2016	2017	2018
LACW/C&I	<b>Total</b>	<b>178,693</b>	<b>170,208</b>	<b>171,025</b>	<b>169,433</b>	<b>175,873</b>
	Total in London	172,444	163,984	162,137	162,723	168,474
	Transfer in London	166	49	101	92	98
	Outside London	6,249	6,224	8,888	6,710	7,399
C&D	<b>Total</b>	<b>67,812</b>	<b>79,297</b>	<b>100,788</b>	<b>54,861</b>	<b>49,197</b>
	Total in London	61,737	76,208	92,782	34,668	39,945
	Transfer in London	47,584	38,084	27,701	21,905	24,885
	Outside London	6,075	3,089	8,006	20,193	9,252

Source: Waste Data Interrogator and Incinerator Returns 2014-2018

8.11 For the duty to co-operate it is important to establish the destination of ‘significant’ movements of waste exports from Westminster. Westminster’s waste exports which leave London are mostly received in the wider south east (WSE) region. It is therefore appropriate to use the wider south east (WSE) thresholds to indicate ‘significant’ waste movements. These thresholds were agreed at the South East Waste Planning Advisory Group (SEWPAG) meeting of 10<sup>th</sup> April 2014 and the East of England Waste Technical Advisory Board (EoEWTAB) meeting of meeting of 3<sup>rd</sup> April 2014. The thresholds are:

- 2,500 tpa non-hazardous waste (LACW and C&I)
- 5,000 tpa inert waste (CD&E)
- 100 tpa hazardous waste

8.12 These thresholds are currently under review in London, the South East and the East of England. They may rise to the following amounts of waste to indicate ‘strategic’ waste movements:

- 5,000 tpa non-hazardous waste (LACW and C&I)
- 10,000 tpa inert waste (CD&E)
- 100 tpa hazardous waste

However, for the purposes of duty to co-operate engagement the agreed thresholds have been used.

8.13 It is important to demonstrate that Westminster’s waste can continue to be exported throughout the plan period. Waste Planning Authorities (WPAs) who have received strategic amounts of Westminster’s waste over the past five years are set out below. Data on waste exports has been separated by type of waste: LACW and C&I (apportioned) waste, CD&E waste and hazardous waste.

8.14 Table 8.4 shows ‘significant’ LACW and Commercial & Industrial waste exports over 2,500tpa over the last five years sourced from the Environment Agency’s Waste Data Interrogator (WDI). The WDI groups these two waste streams together as “HIC” (household, industrial and commercial) and it is therefore not possible to say what proportion of the waste is LACW or C&I. However, the WDI does not include information for energy from waste facilities and so these have been included. Further details about which sites these exports are received at is set out in Appendix F.

Table 8.4: Westminster’s recorded LACW and C&I waste exports over 2,500tpa 2014-2018 (tonnes)

WPA	2014	2015	2016	2017	2018
Lewisham	144,012	148,775	146,721	143,742	144,340
Newham	18,114	40	21	23	11
Slough	2,767	2,293	3,268	1,116	1,537
Southwark	1,866	8,009	10,348	9,772	14,132
Thurrock	3,179	3,613	4,476	4,893	4,769
Wandsworth	1,499	5,810	3,587	0	0
All others	1,025	1,108	1,359	596	446

Source: Waste Data Interrogator and Incinerator Returns 2014-2018

## Inert (CD&E) waste exports

8.15 Table 8.5 shows significant Inert (CD&E) waste exports over 5,000tpa over the last five years. Further details about which sites these exports are received at is set out in Appendix F.

Table 8.5: Westminster's recorded Inert (CD&E) waste exports over 5,000tpa 2014-2018 (tonnes)

WPA	2014	2015	2016	2017	2018
East London (Havering, Barking & Dagenham, Newham)	17,939	32,517	61,357	27,117	15,571
Essex	6,922	2,319	16,519	17,393	14,458
Greenwich	5,548	11,909	16,405	6,258	8,325
Hertfordshire	1,104	35,950	10,489	263	0
Kent (temporary facility)	129,545	13	2	0	2
North London (Barnet)	20,052	13,838	9,403	10,079	17,203
South London (Merton)	5,911	7,925	4,730	3,860	4,079
Surrey	5	382	4,521	3,026	385
Thurrock	72,111	6,942	3,563	63,677	91,066
West London (Ealing (OPDC), Brent, Hillingdon)	48,179	115,238	247,922	197,551	25,655
Windsor and Maidenhead	0	0	0	0	8,172
All others	1,153	1,013	3,170	4,914	3,268

Source: Waste Data Interrogator 2014-2018

## Hazardous waste exports

8.16 There are two sources of data for hazardous waste exports. The Hazardous Waste Data Interrogator, which provides more accurate information on the amounts and type of waste but not the destination, and the Waste Data Interrogator which includes the destination facility, but is less accurate about the quantities of waste. Table 8.6 provides figures from the HWDI only but information from both data sources can be found in Appendix F.

8.17 The main types of hazardous waste arising is in the 'C&D Waste and Asbestos', 'Oil and Oil/Water Mixtures' and 'Healthcare' categories.

Table 8.6: Hazardous waste exports over 100tpa from Westminster 2014-2018 (tonnes)

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
Bexley	Healthcare	Incineration	401	257	333	295	401
		Transfer	134	144	162	190	180
	All other	All other	63	123	64	37	75

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
Cambridgeshire	C&D Waste and Asbestos	Landfill	0	19	321	810	541
		Recovery	0	0	31	230	36
	Healthcare	Treatment	45	63	4	25	124
	All other	All other	24	125	16	35	19
Dudley	C&D Waste and Asbestos	Landfill	0	0	0	0	52
	Municipal and Similar Commercial Wastes	Recovery	0	0	2	0	95
	All other	All other	78	103	0	0	0
Essex	C&D Waste and Asbestos	Transfer	532	527	441	527	601
	All other	All other	38	41	54	69	58
Havering	Oil and Oil/Water Mixtures	Treatment	278	145	24	63	236
	Not Otherwise Specified	Treatment	21	378	39	17	109
	All other	All other	62	63	22	43	42
Hertfordshire	Oil and Oil/Water Mixtures	Treatment	110	85	96	159	144
	All other	All other	98	93	41	22	42
Kent	Oil and Oil/Water Mixtures	Treatment	71	35	86	69	74
	C&D Waste and Asbestos	Landfill	515	336	58	125	121
	Healthcare	Recovery	15	9	634	378	146
		Transfer	182	39	236	122	45
All other	All other	592	202	120	160	123	
Newham	C&D Waste and Asbestos	Recovery	18,919	3,779	4,427	3,337	1,223
	All other	All other	62	47	159	141	60
Northamptonshire	C&D Waste and Asbestos	Transfer	77	0	6	204	918

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
	All other	All other	24	41	7	53	14
Sandwell	C&D Waste and Asbestos	Treatment	0	0	0	0	156
	All other	All other	65	32	25	28	7
Surrey	C&D Waste and Asbestos	Landfill	1,149	159	59	648	137
		Recovery	0	0	0	0	120
		Treatment	3	0	0	0	63
	All other	All other	44	71	74	57	61
Thurrock	C&D Waste and Asbestos	Transfer	56	177	129	198	197
	All other	All other	2	1	2	2	4
Windsor & Maidenhead	Healthcare	Transfer	91	91	96	91	91
		Treatment	399	425	455	446	482
	All other	All other	0	0	0	0	0
<b>All Hazardous waste exports</b>	<b>All</b>	<b>All</b>	<b>26,506</b>	<b>8,676</b>	<b>9,552</b>	<b>9,797</b>	<b>7,880</b>

Source: Hazardous Waste Data Interrogator 2014-2018

## Waste Imports

8.18 Table 8.7 is a summary of all waste imports over the last five years. Only a very small amount of waste is imported to Westminster to be managed at Buckingham Palace or Regents Park Leaf Yard facilities, and these are not considered strategically significant.

Table 8.7: Waste imports to Westminster 2014-2018

Origin	Waste	2014	2015	2016	2017	2018
WPA not codeable (London)	HIC	648	333	442	206	0
Camden	HIC	0	397	430	629	214
Kensington & Chelsea	HIC	0	0	0	10	12
<b>Total</b>		<b>648</b>	<b>730</b>	<b>872</b>	<b>845</b>	<b>226</b>

Source: Waste Data Interrogator 2014-2018

## Duty to Co-operate

8.19 The Duty to Co-operate requires Westminster “to engage, constructively, actively and on an on-going basis” with prescribed public bodies in the preparation of development plan documents “so far as relating to a strategic matter”. The National Planning Policy Framework (NPPF) includes infrastructure for waste management as one of the strategic policy areas.

- 8.20 In order for the City Plan to be found sound, statements of common ground will be needed to demonstrate effective and on-going joint working with recipient authorities on waste exports from Westminster.
- 8.21 In March 2019 Westminster contacted 22 local authorities who receive over 1,000 tonnes of waste annually from Westminster. These authorities were contacted as part of the duty to co-operate to establish if waste management facilities would remain available over the plan period to continue to receive waste from Westminster.
- 8.22 When writing to the London Boroughs, Westminster also sought confirmation on whether the authority had capacity to take any of the waste apportioned to Westminster in the London Plan.
- 8.23 The results of this stage of the duty to co-operate engagement on waste movements and capacity are available in the [Duty to Co-operate Statement](#) (November 2019).
- 8.24 As part of preparing this Waste Evidence Base, Westminster wrote to 23 waste planning authorities who receive 'significant' amounts of waste exports from the city, defined by the thresholds set out above. A draft statement of common ground (SoCG) was attached for comment. The draft SoCG set out the strategic matters on waste movements identified through previous engagement and suggested
- 8.25 The wider south east and London waste planning authorities are currently reviewing these thresholds which may rise. If the thresholds are raised it would reduce the number of WPAs by three.
- 8.26 A key issue for cross-boundary movements of waste is the declining landfill void space. Some of Westminster's CD&E exports are received at East Tilbury Quarry in Thurrock and Rainham Landfill in Havering, both of which are due to close during the plan period (in 2021 and 2024 respectively). The market will need to find alternative destinations for Westminster's CD&E waste currently deposited at these sites. In line with the new London Plan requirement for Circular Economy Statements, the target of 95% beneficial use for excavation waste and 95% reuse/recycling/recovery of C&D waste, developers will need to manage CD&E waste as high up the waste hierarchy as possible, diverting it away from landfill where possible.
- 8.27 There is approximately 65 million m<sup>3</sup> of inert landfill voidspace in the wider south east region<sup>19</sup>. In terms of future landfill capacity, it is not possible to know how quickly void space in London, South East and East of England will be used up. This will depend on the type and amount of waste produced in the surrounding area, for example from major infrastructure projects such as the Northern Line extension, High Speed 2 and CrossRail 2. However, it is acknowledged that landfill capacity in the wider south east is declining and few new landfill sites are currently being put forward by waste operators. While new landfill sites could come forward during the plan period, declining landfill capacity in the wider south east is an issue for all waste planning authorities preparing

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<sup>19</sup> [Remaining Landfill capacity dataset](#), Environment Agency (November 2917)

plans. It is also recognised that Westminster’s waste will have to compete against waste from large-scale infrastructure projects and other authorities for landfill void space.

8.28 Westminster will need to demonstrate to an Inspector that cross boundary strategic matters on waste have been “dealt with rather than deferred”. Landfill capacity is a particular area of scrutiny for Inspectors and evidence will be sought that there is available void space to meet Westminster’s identified needs. Landfill void space capacity will be identified through the Environment Agency dataset and any supplementary information from waste planning authorities.

8.29 Table 8.8 sets out progress on agreeing statements of common ground (SoCG). The table shows that all SoCG have been agreed and signed. 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.

8.30 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.

8.31 The full text of agreed and draft SoCG can be found in Appendix G.

Table 8.8: Duty to co-operate audit October 2020

Authority	SoCG agreed	SoCG signed
Barking & Dagenham	✓	✓
Brent	✓	✓
Cambridgeshire	✓	✓
Dudley	Does not consider waste movements strategic, no SoCG necessary.	N/A
Essex	✓	✓
Greenwich	Does not consider waste movements strategic, no SoCG necessary.	N/A
Havering	✓	✓
Hertfordshire	✓	✓
Hillingdon	✓	✓
Kent	✓	✓
Merton	✓	✓
Newham	✓	✓

Authority	SoCG agreed	SoCG signed
North London (Barnet)	✓	✓
Northamptonshire	✓	✓
OPDC (Ealing)	✓	✓
Sandwell	Does not consider waste movements strategic, no SoCG necessary.	N/A
Slough	Does not consider waste movements strategic, no SoCG necessary.	N/A
Southeast London Boroughs group (Bexley, Lewisham, Southwark)	✓	✓
Surrey	✓	✓
Thurrock	✓	✓
Wandsworth	Does not consider waste movements strategic, no SoCG necessary.	N/A
Windsor & Maidenhead and Wokingham (joint)	✓	✓

8.32 Westminster will also need to monitor waste exports in the future. If there are significant changes to the amounts or destinations, Westminster will need to engage on this matter with the recipient waste planning authority through the duty to co-operate. This approach has been agreed through statements of common ground with recipient WPAs.

## 9. Recommendations

9.1 This section takes the findings of the waste evidence base work and proposes additions to Policy 38: Waste Management and supporting text.

- Include a reference to all seven waste streams and the plan to manage them
- Include a reference to the Circular Economy and Circular Economy Statements
- Include a reference to the agreement with Bexley to provide capacity to meet Westminster's apportionment targets
- Include reference to the aspiration for Westminster to joining the Southeast group of boroughs to plan for waste collectively
- Include a reference to the national and regional criteria to assess applications for waste facilities coming forward on windfall sites, including scale of facilities
- Include a reference to increasing recycling and contributing to target of 65% for 'municipal' waste by 2030
- Include a reference to exports of CD&E and hazardous waste outside London and targets for recycling of C&D and beneficial use of E waste

- Include a reference to the SoCG with WPAs who receive waste from Westminster, and the agreement that it can continue
- Include a commitment to ongoing engagement with authorities who receive strategic amounts of waste exports from Westminster through the duty to co-operate
- Include a reference to [Recycling and Waste Storage Requirements](#)
- Include monitoring indicators for the waste policy

## Appendix A: Statements of Common Ground with GLA and North London Boroughs

### Introduction

This Statement of Common Ground (SCG) addendum on Waste has been prepared between Westminster City Council and the Mayor of London in response to Q8 of Note 1 from the Appointed Inspectors (document reference INSP1). It seeks to provide clarification of the extent to which matters raised in the Mayor’s letter of general conformity on waste have been addressed.

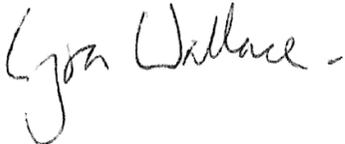
Issue raised	General conformity or comment	WCC response (including relevant modification reference number where necessary)	Status of issue
<p>As stated previously, the Mayor welcomes Westminster’s focus on waste reduction and recycling, however, as acknowledged by the draft Plan, activities in Westminster generate significant amounts of waste. Table 9.1 of the draft new London Plan, forecasts that Westminster will generate more than twice the amount of household and commercial &amp; industrial waste than any other authority in London. However, the borough’s apportionment set out in Table 9.2 is relatively low, reflecting the local circumstance in Westminster.</p> <p>Westminster’s Waste Evidence Base June 2019 paper sets out that 67.2% of its waste is treated in London. However no formal agreement has been made with the relevant London waste planning authorities. To ensure London is net self-sufficient for waste management by 2026, Westminster must plan for its apportionment through the measures set out in draft new London Plan Policy SI8. The draft Plan states that Westminster will work with local partners and other London boroughs to make arrangements to pool the waste apportionments set by the London Plan and to meet strategic waste planning duties. However, at the time of consultation no formal arrangements had been made for Westminster (or the boroughs it is currently exporting to) to plan for its waste needs and allocate sufficient land to meet its apportionment</p>	<p>General Conformity</p>	<p>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.</p> <p>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.</p>	<p>Resolved.</p> <p>Modifications to policy 38 (see Appendix A) drafted in line with the recommendations of the Waste Data Study and agreed in consultation with the GLA.</p>

<p>requirements, therefore Westminster's Plan cannot be in conformity with the current and draft London Plans.</p>		<p>Table 6.10 of the Waste Evidence Base sets out progress on agreeing statements of common ground. 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. Parties have agreed it will be important to monitor waste movements and engage again if these change significantly from the current trend. Parties also noted that developers in London are required to recycle 95% of C&amp;D waste and put 95% of excavation waste to beneficial use to divert this waste stream from landfill.</p> <p>The full text of agreed and draft SoCG can be found in Appendix G of Westminster's Waste Evidence Base (March 2020).</p>	
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		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. Changes to the policy and supporting text will then be made in consultation with the GLA before being consulted on as main modifications.	
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### Signed confirmation

The Council and the Mayor of London agree that this SCG represents an accurate record of their respective positions on the Westminster City Plan and issues raised through the Mayor's letter of general conformity.

Signed on behalf of Westminster City Council		
Name and position	Signature	Date
Ezra Wallace Director of Policy & Projects		19/06/2020

Signed on behalf of the Mayor of London		
Name and position	Signature	Date
Philip Graham Executive Director – Good Growth		26/06/20

## Appendix A: Modifications to Policy 38: Waste Management

Modifications in red were made at submission of the Plan in November 2019

Modifications in blue are proposed in May 2020

### 38. Waste management

**A. The council will promote the Circular Economy and contribute to the London Plan targets for recycling and for London's net self-sufficiency by 2026.**

**B. Developers are required to demonstrate through a Circular Economy Statement, Site Environment Management Plan and/or associated Site Waste Management Plan, the recycling, re-use, and responsible disposal of Construction, Demolition and Excavation waste in adherence with London Plan targets and the council's Code of Construction Practice.**

**C. Existing waste management facilities shown on Figure 33 will be protected. Any proposals for new waste management facilities will be assessed against the criteria set out in the London Plan and national policy.**

**D. All new developments (including extensions and change of use) must provide appropriate facilities for the storage of separate waste streams which are safe and convenient to access for deposit and collection, with sufficient capacity for current and projected future use.**

~~**E. Major developments and developments that produce hazardous, medical and/or commercial catering waste are required to provide appropriate waste management facilities on-site.**~~

**F. The council will continue to collaborate with other Waste Planning Authorities in the management of its waste and monitor its waste exports.**

38.1 / Waste management is one of the greatest challenges for a growing city, which is also transitioning to a circular economy. Households, businesses, institutions and building projects all generate waste in Westminster and the council has a duty to plan for the management of seven waste streams and to drive waste up the waste hierarchy. The seven waste streams include Local Authority Collected Waste (LACW), Commercial & Industrial (C&I) waste, Construction, Demolition and Excavation (CD&E) waste, hazardous, agricultural, low level radioactive waste and waste water.

38.2 / The council will contribute to the London Plan target of net self-sufficiency by 2026 by planning for Westminster's apportionment targets. The council has reached an agreement with the London Borough of Bexley to use part of its surplus capacity to meet Westminster's 2.3% waste apportionment targets (LACW and C&I waste streams) as set out in the draft London Plan<sup>20</sup>. This arrangement has been informed by a Waste Data Study (2020) which

<sup>20</sup> Table 9.2 in Policy S18 of the draft London Plan

provides an understanding of the borough's waste need, and has been formalised in a Statement of Common Ground which are included in an Appendix to the study. The council has the aspiration to join the Southeast London Joint Waste Planning Group, of which the London Borough of Bexley is also part, to plan for waste collectively.

38.3 The council will contribute towards meeting London Plan recycling targets. These include 65% for 'municipal' waste by 2030, 95% for reuse/recycling/recovery for Construction and Demolition waste and 95% beneficial use for excavation waste. These are London-wide targets and Westminster will contribute in its capacity as a waste authority by implementing the municipal waste strategy and in its capacity as a planning authority by requiring developers to meet the recycling and beneficial use targets for construction, demolition and excavation (CD&E) waste in the London Plan and provide sufficient space for segregating waste in new developments. Circular Economy Statements should be submitted for referable applications in line with draft London Plan policy SI7 to demonstrate how CD&E recycling and beneficial use targets will be met. 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 CD&E waste generated in the borough, the council continues to require production of an SWMP for such projects and for all basement developments as specified in its CoCP which includes management of CD&E waste, both through on-site recycling and re-use and on-site waste processing prior to disposal.

38.4 Agricultural waste is composted in the City's Royal Parks together with agricultural waste imports from other boroughs and no additional capacity is required for such waste. The City of London Corporation provides a Hazardous Waste Collection and Disposal Service, HWCDS, to London residents in all London Boroughs (except Hillingdon). Waste water treatment is addressed by Thames Water through the upgrade and expansion of the Beckton Sewage Treatment Works as part of the Thames Tideway Tunnel scheme and only a very small amount of low level radioactive waste is generated in Westminster so no additional facilities are required for these waste streams.

38.5 Westminster has no industrial land suitable for new strategic waste management facilities and we will therefore protect existing waste management facilities and we will continue to monitor and research opportunities for new sites in Westminster. Any proposals for waste management facilities will be assessed against the criteria set out in the London Plan SI8 and National Planning Policy for Waste Appendix B.

38.6 / Developments should provide adequate segregated waste storage facilities that are fully integrated into the design of the scheme, both for individual units and communal storage areas ready for collection. The council's Recycle and Waste Storage Requirements guide (April 2019<sup>21</sup>), provides applicants with guidance on how it expects this to be done including the installation of balers and compactors within the development as required. This also supports the requirements for the amalgamation of facilities in locations that demand an area specific approach to waste collection management.

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<sup>21</sup> [www.westminster.gov.uk/waste-storage-planning-advice](http://www.westminster.gov.uk/waste-storage-planning-advice)

38.7 [The Waste Data Study \(2020\)](#) provides detail on waste imports and exports. It explains that Westminster is a net exporter of waste, with all of the local authority collected and commercial and industrial waste going to facilities in London including Southwark and Lewisham. Part of Westminster's Construction, Demolition and Excavation waste and Hazardous waste is managed in facilities outside of London. We have agreed Statements of Common Ground with the Waste Planning Authorities whom receive a strategic amount of Westminster's waste to agree this can continue or highlight any issues where waste exports may not be able to continue, and agree that alternative destinations for CD&E waste are available. We will continue to monitor waste exports and engage with these authorities under the duty to co-operate. Monitoring indicators include the amount, type and destination of Westminster's waste exports.

## Monitoring Framework

Key Performance Indicators		City Plan objectives	Data source	Trigger for review / review mechanism
38	<a href="#">Amount, type and destination of waste exported from Westminster.</a>	<a href="#">In line with tables in Appendix F of the Waste Data Study (2020) and thresholds agreed by the London Waste Planning Forum.</a>	<a href="#">Waste Data Interrogator</a>	<a href="#">An increase in waste exports by the following amounts will trigger engagement with recipient waste planning authority:</a> <ul style="list-style-type: none"> <li>• <a href="#">5,000 tpa non-hazardous waste (LACW and C&amp;I)</a></li> <li>• <a href="#">10,000 tpa inert waste (CD&amp;E)</a></li> <li>• <a href="#">100 tpa hazardous waste</a></li> </ul>

## STATEMENT OF COMMON GROUND

BETWEEN

WESTMINSTER CITY COUNCIL

AND

THE NORTH LONDON BOROUGHES

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 of the Waste Evidence Base (March 2020).

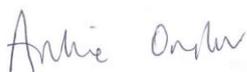
The Waste Evidence Base recommends additions to Policy 38: Waste Management and supporting text (section 9). These will be considered along with any questions and recommendations from the Inspector during the Examination in Public. Changes to the policy and supporting text will then be made and consulted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

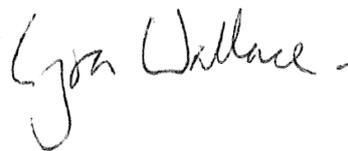
Both parties agree that the proposed additions to Policy 38: Waste Management set out in section 9 of the Waste Evidence Base should be recommended to the Inspector as a viable way for Westminster to fulfil its responsibilities for planning for waste under the National Planning Policy for Waste and the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

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



Archie Onslow  
Programme Manager, North London Waste  
Plan  
Date: 31<sup>st</sup> March 2020

**Signed on behalf of Westminster City  
Council**



Name: Ezra Wallace  
Position: Director of Policy & Projects  
City of Westminster  
Date: 31<sup>st</sup> March 2020

## 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)?

## Appendix B: C&I Waste Arisings Calculations

Data	Source	Details and assumptions	Westminster 2018
Waste originating in Westminster	Waste Data Interrogator (EA)	Tonnes received at facilities with origin Westminster, excluding EWC Chapters 01, 02 01*, 17 and 19.	23,161
Waste originating in 'Central London'	Waste Data Interrogator (EA)		5,304
Incineration	EA Incineration data	Total incinerated with origin Westminster, excluding EWC Chapters 01 (Mining), 02 01* (Agriculture/Forestry/Fishing), 17 (Construction), 19 (Secondary Waste) and 200301 (Mixed Municipal Waste which is captured in WasteDataFlow figures below).	29
Collected non-household waste: Commercial & Industrial	WasteDataFlow	NotQ100 - Collected non-household waste: Commercial & Industrial Q100 – Tonnes From Commercial Sources, Tonnes From Industrial Sources	84,036
Exempt facilities	Waste Exemptions in England: End of December 2019	Inclusions and assumptions set out in Appendix E of New Methodology to Estimate Waste Generation by the Commercial and Industrial Sector in England (2014)	41,330
<b>Total</b>			<b>153,860</b>

## Appendix C: Statement of Common Ground with Bexley on Apportionment Targets

## **Statement of Common Ground on Westminster's Apportionment Targets**

### **1. Parties involved**

- Westminster City Council
- London Borough of Bexley

### **2. Strategic geography**

#### **Westminster City Council**

The City of Westminster is in Central London and covers over eight square miles and is home to many of the landmarks synonymous with 'tourist London'. Much of Westminster is within the Central Activities Zone (CAZ) which is a designation set by the Mayor of London to guide planning policies. The City of Westminster has some of the most affluent residential areas in the country, but a diverse demographic means also some of the most deprived. It is a densely populated borough which continues to grow, and space is at a premium.

#### **London Borough of Bexley**

Bexley is an outer London Borough located in the east of London on the edge of Kent. Bexley's neighbours are the London boroughs of Barking and Dagenham, Bromley and Havering and the Royal Borough of Greenwich; and, outside of London, the district councils of Dartford and Sevenoaks in Kent and the unitary authority of Thurrock in Essex. Some of the borough's characteristics are shared with one or more of its neighbours, such as its industrial legacy, suburban character, metropolitan green belt and water courses, including the River Thames. Bexley is one of the six South East London authorities who work together to plan for waste in the area.

### **3. Strategic waste issue**

The London Plan apportions an amount of household and business waste to each borough to plan for through their Local Plan. Boroughs are required to allocate sufficient land and identify waste management facilities to provide the capacity to manage their apportioned tonnages of waste. Westminster City Council (WCC) has been given an apportionment target of 200,000 tonnes by 2041, but has no existing waste facilities to manage this amount of waste and no designated industrial land to accommodate new waste facilities.

The London boroughs of Bexley, Bromley, Lewisham, Greenwich and Southwark work collectively to prepare a Joint Waste Technical Paper to demonstrate how waste apportionment targets set by the London Plan will be met. The City of London subsequently joined the group, with Bexley taking responsibility for their apportionment. The Joint Waste Technical Paper (2017) shows that the Southeast London Boroughs have a surplus of capacity within the existing waste facilities after meeting the collective apportioned waste targets.

The Joint Waste Technical Paper (2017) sets out the amount of waste management capacity in the area. Table 1 of the Paper shows that the Southeast London Boroughs have a surplus of capacity within the existing waste facilities after meeting the collective apportioned waste targets. The figures show that there is sufficient surplus capacity within the Southeast Boroughs to accommodate Westminster's apportionment, while still retaining a substantial surplus. This is set out in the table below.

Comparison of WCC apportionment targets and Southeast Borough capacity (tonnes of waste)

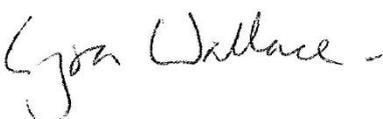
	2021	2031	2041
Westminster apportionment targets	188,000	194,000	200,000
Southeast Boroughs' surplus capacity (Dec 2017)	735,182	500,780	
Surplus capacity after accommodating WCC apportionment	547,182	306,780	

Both parties agree that Bexley will take 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.

Both parties agree to Westminster joining the Southeast waste planning group to pool apportionment targets and plan for waste collectively, subject to formal agreement from the group.

Both parties agree that Westminster will make a payment of £60,000 to the London Borough of Bexley to help off-set the additional work required to incorporate Westminster into the Southeast waste planning group and to support Bexley in its Local Plan preparation.

#### 4. Signatories

Signed: 

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

Signed: 

Name: Jane Richardson  
Position: Assistant Chief Executive Growth and Regeneration  
**London Borough of Bexley**

## Appendix D: Site Profiles

<b>Site Name:</b>	<b>Buckingham Palace</b>
<b>Site address</b>	Buckingham Palace, London SW1A 1AA
<b>OS grid reference</b>	TQ2845379718
<b>Site operator</b>	Royal Household Property Section
<b>Site owner</b>	The Crown Estate
<b>Type of facility</b>	A22 : Composting Facility
<b>Max throughput</b>	648 tonnes per annum
<b>Licensed capacity</b>	1000
<b>Permit number</b>	GB3236AS (104088)
<b>Type of waste accepted</b>	HIC
<b>Management type</b>	Composting

<b>Site Name:</b>	<b>Kensington Gardens Leaf Pen</b>
<b>Site address</b>	The Magazine Store Yard, Kensington Gardens, London W2 2UH
<b>OS grid reference</b>	TQ2663780417
<b>Site operator</b>	The Royal Parks - Kensington Park
<b>Site owner</b>	The Crown Estate
<b>Type of facility</b>	A22 : Composting Facility
<b>Max throughput</b>	2,657 tonnes per annum
<b>Licensed capacity</b>	949
<b>Permit number</b>	CB3106TC (401852)
<b>Type of waste accepted</b>	HIC
<b>Management type</b>	Composting

<b>Site Name:</b>	<b>Regents Park Leaf Yard</b>
<b>Site address</b>	The Store Yard, Inner Circle, Regents Park, London NW1 4NR
<b>OS grid reference</b>	TQ2753883124
<b>Site operator</b>	The Royal Parks

<b>Site Name:</b>	<b>Regents Park Leaf Yard</b>
<b>Site owner</b>	The Crown Estate
<b>Type of facility</b>	A22 : Composting Facility
<b>Max throughput</b>	629 tonnes per annum
<b>Licensed capacity</b>	575
<b>Permit number</b>	CB3106XV (401853)
<b>Type of waste accepted</b>	HIC
<b>Management type</b>	Composting

## Appendix E: Exempt Waste Facilities in Westminster

Issue Date	Permission Ref	Paragraph No	Permit Holder	Grid Ref	Site Address
03/01/2019	WEX154375	D7	Zoological Society of London	TQ2801183480	Regents Park, London, NW1 4RY
17/01/2018	WEX119371	D7	The Royal Parks		The Regents Park, Winter Garden, , London, NW1 4RT
18/05/2018	WEX132077	D7	Zoological Society of London	TQ2801183480	Regents Park, London, NW1 4RY
31/05/2017	WEX097127	T10	Land Securities Properties Ltd	SU6310000050	100, Victoria Street, , London, SW1E 5JL
21/12/2018	WEX153506	T23	Regent's University London	TQ2804482371	Inner Circle, Regents Park, London, NW1 4NS
08/03/2019	WEX162630	T23	Continental Landscapes Ltd		Victoria Embankment Gardens, Off Villiers Street, , London, WC2N 6PB
09/03/2017	WEX088714	T28	Sanctuary Care Limited		Garside House Nursing Home, 131 - 151 Regency Street, , Westminster, SW1P 4AH
07/09/2017	WEX106575	T28	Rodericks Dental Limited		11 - 13, Horseferry Road, Westminster, London, SW1P 2AH
27/02/2019	WEX161227	T28	Central London Community Healthcare NHS Trust		Soho Dental Care, 1 Frith Street, Soho Square, LONDON, W1D 3HZ

Issue Date	Permission Ref	Paragraph No	Permit Holder	Grid Ref	Site Address
27/02/2019	WEX161228	T28	Central London Community Healthcare NHS Trust		Dental Clinic - South Westminster Health Centre , 82 Vincent Square, , LONDON, SW1P 2PF
29/05/2018	WEX133112	T28	OMNIYA	TQ2741579367	3A, Montpelier Street, , London, SW7 1EX
29/11/2018	WEX151872	T28	dilria ltd	TQ2521982516	195, Shirland Road, London, W9 2EU
27/02/2019	WEX161211	T28	Central London Community Healthcare NHS Trust		Athlone House Rehabilitation Unit, 7a Woodfield Road, , LONDON, W9 2BA
22/08/2019	WEX206602	T28	London Claremont Clinic Limited		London Claremont Clinic Pharmacy, 50-52 New Cavendish Street, , London, W1G 8TL
12/09/2018	WEX143686	T28	Queen Anne Street Medical Centre LTD	TQ2866381547	18-22, Queen Anne Street, , London, W1G 8HU
23/01/2019	WEX156833	T28	HCA International Ltd	TQ2857781785	35, Weymouth Street, London, W1G 8BJ
26/06/2018	WEX136013	T28	University College London Hospitals NHS Foundation Trust	TQ2847081696	16-18,, W1G 8PH
15/10/2018	WEX147122	T28	Dr Kokila Mehta	TQ2451486225	145, Cricklewood Lane, London, NW2 1HS
29/10/2018	WEX148718	T28	Way Step Ltd	TQ2688781376	107, Praed Street, London, W2 1NT
18/03/2019	WEX163658	T28	Napclan Retail Ltd		416, Edgware Road, , London, W2 1ED

Issue Date	Permission Ref	Paragraph No	Permit Holder	Grid Ref	Site Address
31/01/2017	WEX084363	T28	curiechem ltd	TQ2658782166	445, Edgware Road, , London, W2 1TH
30/03/2017	WEX091308	T28	Imperial College Healthcare NHS Trust	TQ2682681364	Praed Street, London, W2 1NY
12/07/2017	WEX101567	T28	Mayflower Healthcare Ltd	TQ2712181600	215, Edgware Road, London, W2 1ES
05/07/2019	WEX189970	T28	Benjamin Cory Ltd	TQ2600483642	79, Abbey Road, London, NW8 0AE
17/10/2019	WEX221509	T28	MMCG(2)limited	TQ 26266 83880	48, Boundary Road, London, NW8 0HJ
14/06/2017	WEX098644	T32	Royal Horticultural Society	TQ7832599449	80, Vincent Square, , London, SW1P 2PE
21/03/2017	WEX089950	T4	Not Just Cleaning Limited		No. 1 St James's Market, St James's Market, , London, SW1Y 4AH
31/05/2017	WEX097127	T4	LAND SECURITIES PROPERTIES LTD	SU6310000050	100, Victoria Street, London, SW1E 5JL
03/01/2019	WEX154375	T4	Zoological Society of London	TQ2801183480	Regents Park, London, NW1 4RY
18/05/2018	WEX132077	T4	Zoological Society of London	TQ2801183480	Regents Park, London, NW1 4RY
26/05/2017	WEX096673	T6	EDF ENERGY PLC	SX4825457680	40, Grosvenor Place, London, SW1X 7EN
26/05/2017	WEX096677	T6	EDF ENERGY PLC	SX4825457680	40, Grosvenor Place, London, SW1X 7EN
26/05/2017	WEX096680	T6	EDF ENERGY PLC	SX9662193172	40, Grosvenor Place, London, SW1X 7EN
26/05/2017	WEX096685	T6	EDF ENERGY PLC		40, Grosvenor Place, London, SW1X 7EN

Issue Date	Permission Ref	Paragraph No	Permit Holder	Grid Ref	Site Address
03/01/2019	WEX154375	T6	Zoological Society of London	TQ2801183480	Regents Park, London, NW1 4RY
27/09/2017	WEX108476	T6	Regent's University London	TQ2804482371	Inner Circle, Regents Park, London, NW1 4NS
18/05/2018	WEX132077	T6	Zoological Society of London	TQ2801183480	Regents Park, London, NW1 4RY
13/09/2018	WEX143818	T9	Acre Metals Ltd	TQ2323787145	UNIT 6, Claremont Way Industrial Estate, Claremont Way, London, NW2 1BG
27/11/2018	WEX151625	U1	Coinford Limited		The Old Dick Collins Hall , Redhill Street, London, NW1 4BG
21/09/2018	WEX144784	U1	Galliford Try Partnerships		Galliford Try, Lyons Place, 466-490 Edgware Road, London, W2 1EL
04/01/2017	WEX080983	U1	Willmott Partnership Homes Limited	TQ2657081631	141, Harrow Road, London, W2 1JP
14/06/2017	WEX098644	U11	Royal Horticultural Society	TQ7832599449	80, Vincent Square, London, SW1P 2PE
19/01/2018	WEX119593	U11	Crown Estate Paving Commission	TQ2871082303	12, Park Square East, London, NW1 4LH
26/05/2017	WEX096673	U12	EDF ENERGY PLC	SX4825457680	40, Grosvenor Place, London, SW1X 7EN
26/05/2017	WEX096677	U12	EDF ENERGY PLC	SX4825457680	40, Grosvenor Place, London, SW1X 7EN
26/05/2017	WEX096680	U12	EDF ENERGY PLC	SX9662193172	40, Grosvenor Place, London, SW1X 7EN
26/05/2017	WEX096685	U12	EDF ENERGY PLC		40, Grosvenor Place, London, SW1X 7EN

Issue Date	Permission Ref	Paragraph No	Permit Holder	Grid Ref	Site Address
27/09/2017	WEX108476	U12	Regent's University London	TQ2804482371	Inner Circle, Regents Park, London, NW1 4NS
19/01/2018	WEX119593	U12	Crown Estate Paving Commission	TQ2871082303	12, Park Square East, London, NW1 4LH
27/09/2017	WEX108476	U13	Regent's University London	TQ2804482371	Inner Circle, Regents Park, London, NW1 4NS
10/04/2017	WEX092459	U8	Waitrose Limited		171, Victoria Street, London, SW1E 5NN

## Appendix F: Exports Tables

The following are up-to-date tables for each waste planning authority which received waste exports from Westminster over the thresholds to indicate 'strategic' waste movements over the last five years. These tables have been used for the duty to co-operate engagement.

### Westminster's waste exports to Barking & Dagenham (East London) 2014-2018

Site name	Site type	Waste	2014	2015	2016	2017	2018
Clearun Recycling, 80 River Road	Transfer	CDE	4,798	5,543	4,752	1,750	0
Barking Riverside Development Park	Treatment	CDE	0	0	0	0	6,062
Other	All	All	1,466	39	40	2	78

Source: Waste Data Interrogator 2014-2018

### Hazardous waste exports to Bexley (tonnes) 2014-2018

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
Bexley	Healthcare	Incineration	401	257	333	295	401
		Transfer	134	144	162	190	180
	All other	All other	63	123	64	37	75

Source: Hazardous Waste Data Interrogator 2014-2018

### Westminster's waste exports to Brent (West London) (tonnes) 2014-2018

Site name	Site type	Waste	2014	2015	2016	2017	2018
X - Bert Haulage	Transfer	CDE	17,868	15,326	13,018	9,600	7,065
Other	All	All	0	0	0	0	132

Source: Waste Data Interrogator 2014-2018

### Hazardous waste exports to Cambridgeshire 2014-2018 (tonnes)

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
Cambridgeshire	C&D Waste and Asbestos	Landfill	0	19	321	810	541
		Recovery	0	0	31	230	36
	Healthcare	Treatment	45	63	4	25	124
	All other	All other	24	125	16	35	19

Source: Hazardous Waste Data Interrogator 2014-2018

### Hazardous waste exports to Dudley 2014-2018 (tonnes)

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
Dudley	C&D Waste and Asbestos	Landfill	0	0	0	0	52

	Municipal and Similar Commercial Wastes	Recovery	0	0	2	0	95
	All other	All other	78	103	0	0	0

Source: Hazardous Waste Data Interrogator 2014-2018

#### Waste exports to Essex 2014-2018 (tonnes)

Destination	Type of waste	Site	2014	2015	2016	2017	2018
Essex	CDE	Highwood Quarry Landfill	6,922	2,089	14,152	17,393	14,045
	CDE	Pitsea Landfill	0	230	2,339	68	376
	CDE	All others	0	0	28	0	37
	Hazardous	Windsor Waste Management (Transfer)	0	0	0	104	131
	Hazardous	S M H Products Ltd (London Branch) (Transfer)	97	110	142	28	0
	Hazardous	All others	0	0	3	22	15
	HIC	All	0	0	235	86	9

Source: Waste Data Interrogator 2014-2018

#### Hazardous waste exports to Essex 2014-2018 (tonnes)

Destination	Type of waste	Fate	2014	2015	2016	2017	2018
Essex	C&D Waste and Asbestos	Transfer	532	527	441	527	601
	All other	All other	38	41	54	69	58

Source: Hazardous Waste Data Interrogator 2014-2018

#### Westminster's waste exports to Havering (East London) (tonnes) 2014-2018

Site name	Site type	Waste	2014	2015	2016	2017	2018
Rainham Landfill	Landfill	CDE	2,715	682	3,187	20,182	955
Kilnbridge Construction Services	Transfer	CDE	4,733	3,876	3,065	1,881	7,411
Other	All	All	31	89	26	3,391	1,157

Source: Waste Data Interrogator 2014-2018

#### Hazardous waste exports to Havering 2014-2018 (tonnes)

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
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Havering	Oil and Oil/Water Mixtures	Treatment	278	145	24	63	236
	Not Otherwise Specified	Treatment	21	378	39	17	109
	All other	All other	62	63	22	43	42

Source: Hazardous Waste Data Interrogator 2014-2018

#### Westminster's waste exports to Hertfordshire 2014-2018 (tonnes)

Site name	Site type	Waste	2014	2015	2016	2017	2018
Great Westwood Landfill	Landfill	CDE	714	8,075	10,489	0	0
Radlett Golf Centre	On/In Land	CDE	0	27,506	0	0	0
Other	All	All	564	457	126	408	102

Source: Waste Data Interrogator 2014-2018

#### Hazardous waste exports to Hertfordshire 2014-2018 (tonnes)

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
Hertfordshire	Oil and Oil/Water Mixtures	Treatment	110	85	96	159	144
	All other	All other	98	93	41	22	42

Source: Hazardous Waste Data Interrogator 2014-2018

#### Westminster's waste exports to Hillingdon (West London) (tonnes) 2014-2018

Site name	Site type	Waste	2014	2015	2016	2017	2018
Sipson North East Inert Landfill	Landfill	CDE	14,156	510	2,925	11,850	1,725
Other	All	All	0	0	0	12	4

Source: Waste Data Interrogator 2014-2018

#### Westminster's hazardous waste exports to Kent 2014-2018 (tonnes)

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
Kent	Oil and Oil/Water Mixtures	Treatment	71	35	86	69	74
		Landfill	515	336	58	125	121
	Healthcare	Recovery	15	9	634	378	146
		Transfer	182	39	236	122	45

	All other	All other	592	202	120	160	123
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Source: Hazardous Waste Data Interrogator 2014-2018

#### Westminster's waste exports to Lewisham 2014-2018 (tonnes)

Facility	Type of Waste	2014	2015	2016	2017	2018
SELCHP Energy Recovery Facility (Lewisham)	LACW/C&I	144,012	148,775	146,721	143,742	144,340

Source: Environment Agency Incinerator Returns

#### Westminster's recorded waste exports to Merton 2014-2018

Site name	Site type	Waste	2014	2015	2016	2017	2018
Waste Transfer And Recovery Facility (Reston)	Treatment	CDE	5,911	7,925	4,730	3,860	4,079
Other	All	All	0	0	0	0	0

Source: Waste Data Interrogator 2014-2018

#### Westminster's waste exports to Newham (East London) 2014-2018

Site name	Site type	Waste	2014	2015	2016	2017	2018
Dock Road Recycling Facility	Treatment	CDE	0	22,290	50,325	0	0
Bywaters Recycling And Recovery Centre	Treatment	HIC	17,941	0	0	0	0
Orion Support Services	Treatment	CDE	4,281	0	0	0	0
Waste Transfer Station, Silvertown	Transfer	Haz	0	0	0	127	58
Williams Environmental Management Ltd	Transfer	Haz	77	69	129	0	0
Mc Gee Asbestos Removal	Transfer	Haz	4	8	17	0	0
Other	All	All	192	73	22	23	21

Source: Waste Data Interrogator 2014-2018

#### Westminster's hazardous waste exports to Newham (East London) 2014-2018

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
Newham	C&D Waste and Asbestos	Recovery	18,919	3,779	4,427	3,337	1,223

Source: Hazardous Waste Data Interrogator 2014-2018

#### Westminster's hazardous waste exports to Northamptonshire 2014-2018

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
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Northamptonshire	C&D Waste and Asbestos	Transfer	77	0	6	204	918
	All other	All other	24	41	7	53	14

Source: Hazardous Waste Data Interrogator 2014-2018

#### Westminster's waste exports to OPDC (Ealing) 2014-2018

Site name	Site type	Waste	2014	2015	2016	2017	2018
Willesden Freight Terminal	Transfer	CDE	16,155	99,402	231,979	176,101	16,729
Other	All	All	0	0	0	0	0

Source: Waste Data Interrogator 2014-2018

#### Westminster's Hazardous Exports to Sandwell 2014-2018 (tonnes)

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
Sandwell	C&D Waste and Asbestos	Treatment	0	0	0	0	156
	All other	All other	65	32	25	28	7

Source: Hazardous Waste Data Interrogator 2014-2018

#### Westminster's exports to Slough 2014-2018 (tonnes)

Site name	Site type	Waste	2014	2015	2016	2017	2018
Tanhouse Farm MRF (Source: WDI)	Transfer	HIC	2,749	2,270	3,257	1,112	1,091
Other WDI	All	All	4	698	324	164	64
Lakeside EfW Facility	EfW	Clinical	18	23	11	4	445

Source: Waste Data Interrogator and Incinerator returns 2014-2018

#### Westminster's waste exports to Southwark 2014-2018 (tonnes)

Site name	Site type	Waste	2014	2015	2016	2017	2018
Southwark Integrated Waste Management Facility (Source: WDI)	Treatment	HIC	1,866	0	0	9,772	14,132
Other WDI	All	All	0	0	0	0	0
Southwark Integrated Waste Management Facility (Source: Incinerator Returns)	EfW	HIC	1,866	8,009	10,348	0	0

Source: Waste Data Interrogator and Incinerator Returns 2014-2018

#### Westminster's waste exports to Surrey 2014-2018 (tonnes)

Site name	Site type	Waste	2014	2015	2016	2017	2018
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Redhill Landfill (NEQ)	Landfill	HIC	0	0	0	210	1,247
Redhill Landfill (NEQ)	Landfill	CDE	0	4	1,681	0	0
Queen Mary Reservoir Recycling Facility	Treatment	CDE	0	378	2,840	0	0
Stanwell 111 Aggregate Recycling Facility	Treatment	CDE	0	0	0	2,448	0
Other	All	All	20	7	13	579	386

Source: Waste Data Interrogator 2014-2018

#### Westminster's hazardous waste exports to Surrey 2014-2018 (tonnes)

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
Surrey	C&D Waste and Asbestos	Landfill	1,149	159	59	648	137
		Recovery	0	0	0	0	120
		Treatment	3	0	0	0	63
	All other	All other	44	71	74	57	61

Source: Hazardous Waste Data Interrogator 2014-2018

#### Westminster's waste exports to Thurrock 2014-2018 (tonnes)

Site name	Site type	Waste	2014	2015	2016	2017	2018
Bluelands Quarry	On/In Land	CDE	0	0	0	20,934	19,682
East Tilbury Quarry	Landfill	CDE	758	2,517	83	15,204	15,683
East Tilbury Quarry	Transfer	CDE	5,553	2,972	2,502	1,573	10,661
Land At North Tilbury	On/In Land	CDE	65,800	400	0	0	0
Ockendon Area II & III Landfill	Landfill	CDE	0	0	0	22,561	45,040
Brocks Haulage	Treatment	CDE	0	1,053	978	3,405	0
Juliette Way Materials Recycling & WEEE ATF	Treatment	HIC	3,179	3,613	4,476	4,893	4,769
Other	All	All	0	0	0	0	0

Source: Waste Data Interrogator 2014-2018

#### Hazardous waste exports to Thurrock 2014-2018 (tonnes)

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
Thurrock	C&D Waste and Asbestos	Transfer	56	177	129	198	197

	All other	All other	2	1	2	2	4
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Source: Hazardous Waste Data Interrogator 2014-2018

#### Waste exports to Windsor & Maidenhead 2014-2018 (tonnes)

Site name	Site type	Waste	2014	2015	2016	2017	2018
Kingsmead Landfill	Landfill	CDE	0	0	0	0	8,172
Other	All	All	0	0	0	0	0

Source: Waste Data Interrogator 2014-2018

#### Hazardous waste exports to Windsor & Maidenhead 2014-2018 (tonnes)

Destination	Type of waste	Fate	2014	2015	2016	2017	2018
Windsor & Maidenhead	Healthcare	Transfer	91	91	96	91	91
		Treatment	399	425	455	446	482
	All other	All other	0	0	0	0	0

Source: Hazardous Waste Data Interrogator 2014-2018

#### Westminster's exports to Wandsworth 2014-2018 (tonnes)

Site name	Site type	Waste	2014	2015	2016	2017	2018
Smugglers Way MRF	Treatment	HIC	1,499	5,810	3,587	0	0
Other	All	All	0	0	0	0	0

Source: Waste Data Interrogator 2014-2018

## Appendix G: Statements of Common Ground with Recipients of Westminster's Strategic Waste Exports

[Barking & Dagenham](#)

[Brent](#)

[Cambridgeshire](#)

[Essex](#)

[Havering](#)

[Hertfordshire](#)

[Hillingdon](#)

[Kent](#)

[Merton](#)

[Newham](#)

[North London](#) (Barnet)

[Northamptonshire](#)

[OPDC](#) (Ealing)

[Southeast London Boroughs group](#) (Bexley, Lewisham, Southwark)

[Surrey](#)

[Thurrock](#)

[Royal Borough of Windsor and Maidenhead and Wokingham Borough Council](#)

# Statement of Common Ground on strategic waste matters between Westminster City Council and London Borough of Barking & Dagenham

## 1. Parties involved

- Westminster City Council
- London Borough of Barking & Dagenham

## 2. Strategic geography

### **Westminster City Council**

The City of Westminster is in Central London and covers over eight square miles and is home to many of the landmarks synonymous with ‘tourist London’. Much of Westminster is within the Central Activities Zone (CAZ) which is a designation set by the Mayor of London to guide planning policies. The City of Westminster has some of the most affluent residential areas in the country, but a diverse demographic means also some of the most deprived. It is a densely populated borough which continues to grow, and space is at a premium.

### **London Borough of Barking & Dagenham**

The London Borough of Barking and Dagenham is situated on the north-eastern fringe of London and is at the heart of the Thames Gateway area. It is a relatively small outer London Borough and is predominately residential in character but also has significant areas of employment land. Barking and Dagenham is one of four London Boroughs who typically work together to plan for waste in the East London. The constituent ELWA boroughs are working together to commission a new Joint Waste Plan alongside their respective Local Plan work. The programme for this is still to be finalised but it is envisaged that a new Waste Plan can be prepared and adopted within the extended period for operations continuing at the existing waste sites.

## 3. Strategic waste issues

The City of Westminster has no waste facilities within its borders and no designated industrial land in which to locate new facilities. Westminster exports all of its waste with the exception of a small amount of composting in the Royal Parks. Westminster is contributing towards London’s net self-sufficiency target for Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste by meeting its London Plan apportionment targets. This will be achieved through an arrangement with one of the London Boroughs with

sufficient spare capacity to take on Westminster’s apportionment targets. Construction, demolition and excavation waste will continue to be exported, but developers are required to recycle 95% of C&D waste and put 95% of excavation waste to beneficial use to divert this waste stream from landfill. Hazardous waste, which forms part of these waste streams, will also continue to be exported to specialist facilities.

Both parties agree the following thresholds to indicate ‘strategic’ waste movements:

- CD&E: 5,000 tonnes per annum
- LACW/C&I: 2,500 tonnes per annum
- Hazardous: 100 tonnes per annum

Barking & Dagenham receives strategic amounts of CD&E waste exports from Westminster.

Both parties agree the following figures from the Waste Data Interrogator.

Westminster’s waste exports to Barking & Dagenham (East London) 2014-2018

Site name	Site type	Waste	2014	2015	2016	2017	2018
Clearun Recycling, 80 River Road	Transfer	CDE	4,798	5,543	4,752	1,750	0
Barking Riverside Development Park	Treatment	CDE	0	0	0	0	6,062
Other	All	All	1,466	39	40	2	78

Source: Waste Data Interrogator 2014-2018

Both parties agree that exports to Clearun Recycling has reduced to zero in 2018.

Both parties note that Clearun Recycling is situated within a Strategic Industrial Location, in an area known as Creekmouth. LB Barking and Dagenham intend designating the Creekmouth area to become an attractive riverfront location, which is accessible to residents and workers and supported by a thriving residential community and complementary amenity and workspace. This riverside location has the potential to deliver a stable and balanced population who live and work in the regenerated stretch of riverbank. This is likely to have implications to the existing waste sites and the waste facilities within these sites.

Both parties agree that compensatory waste management capacity is required if a waste site is redevelopment for other uses.

Both parties agree that the Waste and Recycling Centre at Barking Riverside Development Park is a temporary facility to recycle waste from the Barking Riverside redevelopment area, as well as London more widely. The temporary nature of the facility means that Westminster’s waste cannot be managed at the facility over the plan period.

LB Barking and Dagenham will ensure Westminster City Council is consulted on both the Local Plan and the Joint Waste Plan as they progress.

#### 4. Governance arrangements

Both parties agree to monitor waste movements through Authority Monitoring Reports and engage again if these change significantly from the current trend.

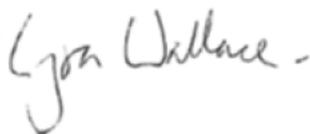
Both parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Westminster.

Both parties agree to review this statement should any changing circumstances occur.

#### 5. Signatories

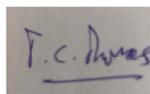
Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed:



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

Signed:



Name: Tim Thomas  
Position: Head of Policy, Transport and  
Infrastructure Planning.  
**Be-First** working on behalf of  
**London Borough of Barking & Dagenham**

# Statement of Common Ground on strategic waste matters between Westminster City Council and London Borough of Brent

## 1. Parties involved

- Westminster City Council
- London Borough of Brent

## 2. Strategic geography

### **Westminster City Council**

The City of Westminster is in Central London and covers over eight square miles and is home to many of the landmarks synonymous with ‘tourist London’. Much of Westminster is within the Central Activities Zone (CAZ) which is a designation set by the Mayor of London to guide planning policies. The City of Westminster has some of the most affluent residential areas in the country, but a diverse demographic means also some of the most deprived. It is a densely populated borough which continues to grow, and space is at a premium.

### **London Borough of Brent**

Brent is an outer London Borough in North West London. Brent is bordered by the London Borough of Barnet to the east, Harrow to the north and Ealing to the west. It has small boundaries with the inner London boroughs of Hammersmith and Fulham, Kensington and Chelsea, Westminster and Camden in the south.

A portion of the south of the borough is within the Old Oak and Park Royal Opportunity Area. The Old Oak and Park Royal Development Corporation (OPDC), a Mayoral Development Corporation (MDC), has been the local planning authority in this part of the borough since 1<sup>st</sup> April 2015.

Brent is one of five West London Boroughs who plan for waste jointly in their area.

## 3. Strategic waste issues

The City of Westminster has no waste facilities within its borders and no designated industrial land in which to locate new facilities. Westminster exports all of its waste with the exception of a small amount of composting in the Royal Parks. Westminster is contributing towards London’s net self-sufficiency target for Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste by meeting its London Plan apportionment targets.

This will be achieved through an arrangement with one of the London Boroughs with sufficient spare capacity to take on Westminster’s apportionment targets. Construction, demolition and excavation waste will continue to be exported, but developers are required to recycle 95% of C&D waste and put 95% of excavation waste to beneficial use to divert this waste stream from landfill. Hazardous waste, which forms part of these waste streams, will also continue to be exported to specialist facilities.

Both parties agree the following thresholds to indicate ‘strategic’ waste movements:

- CD&E: 5,000 tonnes per annum
- LACW/C&I: 2,500 tonnes per annum
- Hazardous: 100 tonnes per annum

Brent receives strategic amounts of CD&E waste exports from Westminster.

Both parties agree the following figures from the Waste Data Interrogator.

Westminster’s waste exports to Brent (West London) (tonnes) 2014-2018

Site name	Site type	Waste	2014	2015	2016	2017	2018
X - Bert Haulage	Transfer	CDE	17,868	15,326	13,018	9,600	7,065
Other	All	All	0	0	0	0	132

Source: Waste Data Interrogator 2014-2018

Both parties agree there are no known planning reasons why exports of similar amounts of waste exports cannot continue.

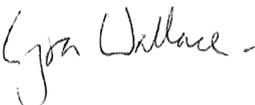
#### 4. Governance arrangements

Both parties agree to monitor waste movements and engage again if these change significantly from the current trend.

Both parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Westminster.

#### 5. Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed:   
 Name: Ezra Wallace  
 Position: Director of Policy & Projects  
**Westminster City Council**

Signed:   
 Name: Paul Lewin  
 Position: Team Leader Planning Policy  
**London Borough of Brent**

# Statement of Common Ground on strategic waste matters between Westminster City Council and Cambridgeshire County Council

## 1. Parties involved

- Westminster City Council
- Cambridgeshire County Council

## 2. Strategic geography

### **Westminster City Council**

The City of Westminster is in Central London and covers over eight square miles and is home to many of the landmarks synonymous with 'tourist London'. Much of Westminster is within the Central Activities Zone (CAZ) which is a designation set by the Mayor of London to guide planning policies. The City of Westminster has some of the most affluent residential areas in the country, but a diverse demographic means also some of the most deprived. It is a densely populated borough which continues to grow, and space is at a premium.

### **Cambridgeshire County Council**

Cambridgeshire County Council and Peterborough City Council are working together to plan for waste in their area. The Plan area includes the cities of Cambridge and Peterborough. Cambridge has an important regional role and is renowned as a centre of learning, research and high technology development. Peterborough plays an equally important role in the north of the Plan area and is a focus of growth within the East of England. There are also a number of market towns, which are a focus for economic and social activity throughout much of the area. The area contains a wide diversity of landscapes and habitats, including some of national and international importance.

## 3. Strategic waste issues

The City of Westminster has no waste facilities within its borders and no designated industrial land in which to locate new facilities. Westminster exports all of its waste with the exception of a small amount of composting in the Royal Parks. Westminster is contributing towards London's net self-sufficiency target for Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste by meeting its London Plan apportionment targets. This will be achieved through an arrangement with one of the London Boroughs with sufficient spare capacity to take on Westminster's apportionment targets. Construction, demolition and excavation waste will continue to be exported, but developers are required

to recycle 95% of C&D waste and put 95% of excavation waste to beneficial use to divert this waste stream from landfill. Hazardous waste, which forms part of these waste streams, will also continue to be exported to specialist facilities.

Planning Practice Guidance for Waste states “Given the unique waste needs of London, there is likely to be a need for waste planning authorities surrounding London to take some of London’s waste. The Mayor and waste planning authorities in London should engage constructively, actively and on an ongoing basis with other authorities, under the duty to cooperate, to help manage London’s waste.”

Westminster needs help to manage CD&E and hazardous waste.

Both parties agree the following thresholds to indicate ‘strategic’ waste movements:

- CD&E: 5,000 tonnes per annum
- LACW/C&I: 2,500 tonnes per annum
- Hazardous: 100 tonnes per annum

Cambridgeshire receives strategic amounts of hazardous waste exports from Westminster.

Both parties agree the following figures from the Hazardous Waste Data Interrogator.

Hazardous waste exports from Westminster 2014-2018 (tonnes)

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
Cambridgeshire	C&D Waste and Asbestos	Landfill	0	19	321	810	541
		Recovery	0	0	31	230	36
	Healthcare	Treatment	45	63	4	25	124
	All other	All other	24	125	16	35	19

Source: Hazardous Waste Data Interrogator 2014-2018

Witcham Meadlands landfill site in Mepal, which receives Westminster’s C&D Waste and Asbestos, is due to close by 2031.

Both parties agree that the destination of waste is largely dependent on market forces and it is not possible to identify a specific alternative landfill site or sites where Westminster’s waste will go after the closure of Witcham Meadlands landfill site. 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 Witcham Meadlands landfill.

Both parties agree there are no known planning reasons why exports of similar amounts of hazardous waste exports to other facilities cannot continue.

#### 4. Governance arrangements

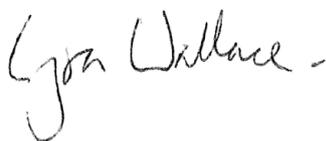
Both parties agree to monitor waste movements through Authority Monitoring Reports and engage again if these change significantly from the current trend.

Both parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Westminster.

## 5. Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed:



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

Signed:



Name: Emma Fitch  
Position: Joint Interim Assistant Director  
Environment and Commercial  
**Cambridgeshire County Council**

# Statement of Common Ground on strategic waste matters between Westminster City Council and Essex County Council

## 1. Parties involved

- Westminster City Council
- Essex County Council

## 2. Strategic geography

### **Westminster City Council**

The City of Westminster is in Central London and covers over eight square miles and is home to many of the landmarks synonymous with 'tourist London'. Much of Westminster is within the Central Activities Zone (CAZ) which is a designation set by the Mayor of London to guide planning policies. The City of Westminster has some of the most affluent residential areas in the country, but a diverse demographic means also some of the most deprived. It is a densely populated borough which continues to grow, and space is at a premium.

### **Essex County Council**

Essex is located to the northeast of London, within the East of England region, and borders the counties of Hertfordshire, Suffolk and Cambridgeshire. Within the County of Essex, the two-tier administrative system includes 12 District, Borough and City Councils. Essex and Southend-on-Sea are working together to plan for the waste in the area.

## 3. Strategic waste issues

The City of Westminster has no waste facilities within its borders and no designated industrial land in which to locate new facilities. Westminster exports all of its waste with the exception of a small amount of composting in the Royal Parks. Westminster is contributing towards London's net self-sufficiency target for Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste by meeting its London Plan apportionment targets. This will be achieved through an arrangement with one of the London Boroughs with sufficient spare capacity to take on Westminster's apportionment targets. Construction, demolition and excavation waste will continue to be exported, but developers are required to recycle 95% of C&D waste and put 95% of excavation waste to beneficial use to divert this waste stream from landfill. Hazardous waste, which forms part of these waste streams, will also continue to be exported to specialist facilities.

Planning Practice Guidance for Waste states “Given the unique waste needs of London, there is likely to be a need for waste planning authorities surrounding London to take some of London’s waste. The Mayor and waste planning authorities in London should engage constructively, actively and on an ongoing basis with other authorities, under the duty to cooperate, to help manage London’s waste.”

Westminster needs help to manage CD&E and hazardous waste.

Both parties agree the following thresholds to indicate ‘strategic’ waste movements:

- CD&E: 5,000 tonnes per annum
- LACW/C&I: 2,500 tonnes per annum
- Hazardous: 100 tonnes per annum

Essex receives strategic amounts of CD&E and hazardous waste exports from Westminster.

Both parties agree the following figures from the Waste Data Interrogator.

Waste exports from Westminster 2014-2018 (tonnes)

Destination	Type of waste	Site	2014	2015	2016	2017	2018
Essex	CDE	Highwood Quarry Landfill	6,922	2,089	14,152	17,393	14,045
	CDE	Pitsea Landfill	0	230	2,339	68	376
	CDE	All others (non landfill)	0	0	28	0	37
	Hazardous	Windsor Waste Management (Transfer)	0	0	0	104	131
	Hazardous	S M H Products Ltd (London Branch) (Transfer)	97	110	142	28	0
	Hazardous	All others	0	0	3	22	15
	HIC	All	0	0	235	86	9

Source: Waste Data Interrogator 2014-2018

Both parties agree the following figures from the Hazardous Waste Data Interrogator.

Hazardous waste exports from Westminster 2014-2018 (tonnes)

Destination	Type of waste	Fate	2014	2015	2016	2017	2018
Essex	C&D Waste and Asbestos	Transfer	532	527	441	527	601
	All other	All other	38	40	54	69	58

Source: Hazardous Waste Data Interrogator 2014-2018

Highwood Quarry landfill site in Essex receives significant amounts of Westminster's CD&E waste. Highwood Quarry has planning permission until 2027. Pitsea Landfill site, has received some CD&E from the City of Westminster between 2015 and 2018. This latter site is a non-hazardous landfill, which is no longer accepting non-hazardous waste for disposal, but may still receive CD&E waste for the purposes of restoring the landfill site for the next two to three years (or until the time that this site is suitably restored).

Both parties agree that CD&E waste movements to facilities for disposal in Essex will not be able to continue after the closure of Highwood Quarry in 2027 unless additional capacity is permitted. Essex Council will maintain a list of all permitted landfill sites in its Authority Monitoring Report, which is updated broadly on an annual basis.

Both parties acknowledge that landfill capacity in the wider south east is declining and limited new landfill sites are being put forward by waste operators. While new landfill sites could come forward during the Westminster's plan period, declining landfill capacity in the wider south east is an issue for all waste planning authorities preparing plans.

Both parties agree that there is a continuing need to plan to manage waste further up the waste hierarchy to help reduce the need for landfill capacity.

Both parties agree that, in the short term, the remaining landfill void space currently available in the wider south east<sup>22</sup> represents opportunity for the market to find an alternative destination for Westminster's waste after the closure of Elsenham landfill site.

Both parties agree 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 landfill site or sites in the wider south east where Westminster's waste will go over the next 15 years.

Both parties agree there are no known planning reasons why exports of similar amounts of hazardous waste exports cannot continue, with the exception of the amount of waste that has been accommodated at Pitsea landfill between 2015 and 2018 .

#### 4. Governance arrangements

Both parties agree to monitor waste movements through Authority Monitoring Reports and engage again if these change significantly from the current trend.

Both parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Westminster.

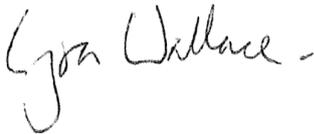
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<sup>22</sup> 'Wider South East' incorporates all the waste planning authorities surrounding and proximate to London. Up to date landfill void space is available on [Defra's website](#).

## 5. Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed:



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

Signed:



Name: Philip Dash  
Position: Principal Minerals and Waste  
Policy Officer  
**Essex County Council**

# Statement of Common Ground on strategic waste matters between Westminster City Council and London Borough of Havering

## 1. Parties involved

- Westminster City Council
- London Borough of Havering

## 2. Strategic geography

### **Westminster City Council**

The City of Westminster is in Central London and covers over eight square miles and is home to many of the landmarks synonymous with 'tourist London'. Much of Westminster is within the Central Activities Zone (CAZ) which is a designation set by the Mayor of London to guide planning policies. The City of Westminster has some of the most affluent residential areas in the country, but a diverse demographic means also some of the most deprived. It is a densely populated borough which continues to grow, and space is at a premium.

### **London Borough of Havering**

The London Borough of Havering is an outer London Borough, bordered to the west and south by the London Boroughs of Redbridge, Barking & Dagenham and Bexley, and by Essex to the east and north. The London Borough of Havering is one of four East London Boroughs who are working together to plan for waste in the area.

## 3. Strategic waste issues

The City of Westminster has no waste facilities within its borders and no designated industrial land in which to locate new facilities. Westminster exports all of its waste with the exception of a small amount of composting in the Royal Parks. Westminster is contributing towards London's net self-sufficiency target for Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste by meeting its London Plan apportionment targets. This will be achieved through an arrangement with one of the London Boroughs with sufficient spare capacity to take on Westminster's apportionment targets. Construction, demolition and excavation waste will continue to be exported, but developers are required to recycle 95% of C&D waste and put 95% of excavation waste to beneficial use to divert this waste stream from landfill. Hazardous waste, which forms part of these waste streams, will also continue to be exported to specialist facilities.

Both parties agree the following thresholds to indicate ‘strategic’ waste movements:

- CD&E: 5,000 tonnes per annum
- LACW/C&I: 2,500 tonnes per annum
- Hazardous: 100 tonnes per annum

Havering receives strategic amounts of CD&E and hazardous waste exports from Westminster.

Both parties agree the following figures from the Waste Data Interrogator.

Westminster’s waste exports to Havering (East London) (tonnes) 2014-2018

Site name	Site type	Waste	2014	2015	2016	2017	2018
Rainham Landfill	Landfill	CDE	2,715	682	3,187	20,182	7,411
Kilnbridge Construction Services	Transfer	CDE	4,733	3,876	3,065	1,881	955
Other	All	All	31	89	26	3,391	1,157

Source: Waste Data Interrogator 2014-2018

Both parties agree the following figures from the Hazardous Waste Data Interrogator.

Hazardous waste exports from Westminster 2014-2018 (tonnes)

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
Havering	Oil and Oil/Water Mixtures	Treatment	278	145	24	63	236
	Not Otherwise Specified	Treatment	21	378	39	17	109
	All other	All other	62	63	22	43	42

Source: Hazardous Waste Data Interrogator 2014-2018

Both parties agree there are no known planning reasons why exports of similar amounts of waste exports cannot continue to Havering’s facilities, with the exception of Rainham landfill site.

Both parties agree that Rainham landfill site is due to close in 2024 and as no new or replacement landfill is proposed, it is unlikely that Westminster’s CD&E waste exports will be received at this site after this date.

Both parties agree 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 Rainham landfill site. Inert 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 Rainham landfill (see Appendix A).

#### 4. Governance arrangements

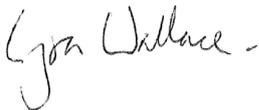
Both parties agree to monitor waste movements through Authority Monitoring Reports and engage again if these change significantly from the current trend.

Both parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Westminster.

#### 5. Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed:



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

Signed:



Name: Helen Oakerbee  
Position: Assistant Director of Planning  
**London Borough of Havering**

## Appendix A: Landfill Capacity in the Wider South East

The following table includes landfill sites in 2018 (the most recent data) with void space over 1m m<sup>3</sup> in the wider south east.

WPA	Landfill site	Type of site	Remaining void space 2018
Berkshire	Kingsmead Landfill	Inert LF	2,731,685
Buckinghamshire	Denham Park Farm	Inert LF	1,610,779
Essex	Highwood Quarry Inert Landfill	Inert LF	1,609,745
Hampshire	Bleak Hill 1 Landfill	Inert LF	1,419,387
Hertfordshire	Hatfield Aerodrome		1,559,250
Hertfordshire	Tyttenhanger Landfill Site	Inert LF	5,957,385
Kent	Borough Green Landfill	Inert LF	1,876,700
Oxfordshire	Shipton Quarry	Inert LF	1,520,000
Oxfordshire	Shellingford Quarry Landfill	Inert LF	1,480,000
Suffolk	Lawn Farm Quarry	Inert LF	1,330,000
Surrey	Oxted Quarry Landfill	Inert LF	2,106,277
Surrey	Homefield Landfill Site	Inert LF	1,027,320
Surrey	Alton Road Sand Pit	Inert LF	2,430,000
<b>Total</b>			<b>26,658,528</b>

# Statement of Common Ground on strategic waste matters between Westminster City Council and Hertfordshire County Council

## 1. Parties involved

- Westminster City Council
- Hertfordshire County Council

## 2. Strategic geography

### **Westminster City Council**

The City of Westminster is in Central London and covers over eight square miles and is home to many of the landmarks synonymous with ‘tourist London’. Much of Westminster is within the Central Activities Zone (CAZ) which is a designation set by the Mayor of London to guide planning policies. The City of Westminster has some of the most affluent residential areas in the country, but a diverse demographic means also some of the most deprived. It is a densely populated borough which continues to grow, and space is at a premium.

### **Hertfordshire County Council**

The county of Hertfordshire lies to the north of London and shares its border with several London boroughs. Hertfordshire’s close proximity to London, strong communication links, highly skilled workforce and good quality of life have attracted a wide range of businesses to the county. This proximity also leads to the cross-boundary movement of differing waste types. Hertfordshire comprises eleven planning authorities: the county council and ten district and borough councils. As a Waste Planning Authority, Hertfordshire County Council, engages with its own district and borough councils, London boroughs, the GLA and Waste Planning Authorities further afield.

## 3. Strategic waste issues

The City of Westminster has no waste facilities within its borders and no designated industrial land in which to locate new facilities. Westminster exports all of its waste with the exception of a small amount of composting in the Royal Parks. Westminster is contributing towards London’s net self-sufficiency target for Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste by meeting its London Plan apportionment targets. This will be achieved through an arrangement with one of the London Boroughs with sufficient spare capacity to take on Westminster’s apportionment targets. Construction, demolition and excavation waste will continue to be exported, but developers are required

to recycle 95% of C&D waste and put 95% of excavation waste to beneficial use to divert this waste stream from landfill. Hazardous waste, which forms part of these waste streams, will also continue to be exported to specialist facilities.

Planning Practice Guidance for Waste states “Given the unique waste needs of London, there is likely to be a need for waste planning authorities surrounding London to take some of London’s waste. The Mayor and waste planning authorities in London should engage constructively, actively and on an ongoing basis with other authorities, under the duty to cooperate, to help manage London’s waste.”

Westminster needs help to manage CD&E and hazardous waste.

Both parties agree the following thresholds to indicate ‘strategic’ waste movements:

- CD&E: 5,000 tonnes per annum
- LACW/C&I: 2,500 tonnes per annum
- Hazardous: 100 tonnes per annum

Historically, Hertfordshire has received strategic amounts of CD&E and hazardous waste exports from Westminster.

Both parties agree the following figures from the Waste Data Interrogator.

Westminster’s waste exports to Hertfordshire 2014-2018 (tonnes)

Site name	Site type	Waste	2014	2015	2016	2017	2018
Great Westwood Landfill	Landfill	CDE	714	8,075	10,489	0	0
Radlett Golf Centre	On/In Land	CDE	0	27,506	0	0	0
Other	All	All	564	457	126	408	102

Source: Waste Data Interrogator 2014-2018

Both parties agree the following figures from the Hazardous Waste Data Interrogator.

Hazardous waste exports from Westminster 2014-2018 (tonnes)

WPA	Type of waste	2014	2015	2016	2017	2018
Hertfordshire	Oil and Oil/Water Mixtures	140	115	123	162	157
	All other	68	63	14	20	27

Source: Hazardous Waste Data Interrogator 2014-2018

Both parties note that there has been no significant CD&E waste exports from Westminster to Hertfordshire in recent years. Westmill landfill site is no longer accepting residual non-hazardous waste and the facility cannot be relied on to accept waste from March 2020. The exports to Radlett Gold Centre in 2015 were a one-off deposit and exports to this site are unlikely to continue as the facility does not have permanent planning permission.

Both parties agree there are no known planning reasons why exports of similar amounts of hazardous waste exports cannot continue.

#### 4. Governance arrangements

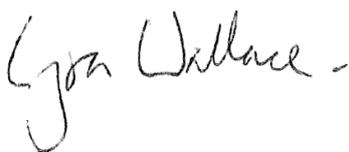
Both parties agree to monitor waste movements through Authority Monitoring Reports and engage again if these change significantly from the current trend.

Both parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Westminster.

#### 5. Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed:



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

Signed:



Name: Julie Greaves  
Position: Minerals and Waste Policy  
Manager  
**Hertfordshire County Council**

# Statement of Common Ground on strategic waste matters between Westminster City Council and London Borough of Hillingdon

## 1. Parties involved

- Westminster City Council
- London Borough of Hillingdon

## 2. Strategic geography

### **Westminster City Council**

The City of Westminster is in Central London and covers over eight square miles and is home to many of the landmarks synonymous with ‘tourist London’. Much of Westminster is within the Central Activities Zone (CAZ) which is a designation set by the Mayor of London to guide planning policies. The City of Westminster has some of the most affluent residential areas in the country, but a diverse demographic means also some of the most deprived. It is a densely populated borough which continues to grow, and space is at a premium.

### **London Borough of Hillingdon**

Hillingdon is one of the West London Boroughs planning for waste collectively through the West London Waste Plan. The borough has a strong economy and excellent transport links to/ from London, the west of England and the world. The area to the north of the A40 is semi-rural, with Ruislip as its main district centre. The south of the borough is more densely populated, urban in character and contains the metropolitan centre of Uxbridge and the district centres of Hayes and West Drayton.

## 3. Strategic waste issues

The City of Westminster has no waste facilities within its borders and no designated industrial land in which to locate new facilities. Westminster exports all of its waste with the exception of a small amount of composting in the Royal Parks. Westminster is contributing towards London’s net self-sufficiency target for Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste by meeting its London Plan apportionment targets. This will be achieved through an arrangement with one of the London Boroughs with sufficient spare capacity to take on Westminster’s apportionment targets. Construction, demolition and excavation waste will continue to be exported, but developers are required to recycle 95% of C&D waste and put 95% of excavation waste to beneficial use to divert

this waste stream from landfill. Hazardous waste, which forms part of these waste streams, will also continue to be exported to specialist facilities.

Both parties agree the following thresholds to indicate 'strategic' waste movements:

- CD&E: 5,000 tonnes per annum
- LACW/C&I: 2,500 tonnes per annum
- Hazardous: 100 tonnes per annum

Hillingdon receives strategic amounts of CD&E and hazardous waste exports from Westminster.

Both parties agree the following figures from the Waste Data Interrogator.

Westminster's waste exports to Hillingdon (West London) (tonnes) 2014-2018

Site name	Site type	Waste	2014	2015	2016	2017	2018
Sipson North East Inert Landfill	Landfill	CDE	14,156	510	2,925	11,850	1,725

Source: Waste Data Interrogator 2014-2018

Both parties agree that capacity at Sipson North East Inert Landfill is finite and the site is coming to the end of its operational life. The waste received at Sipson North East Inert Landfill from Westminster is likely to be part of the restoration works and is therefore of beneficial use.

#### 4. Governance arrangements

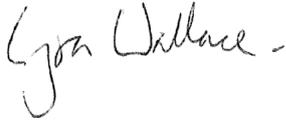
Both parties agree to monitor waste movements through Authority Monitoring Reports and engage again if these change significantly from the current trend.

Both parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Westminster.

#### 5. Signatories

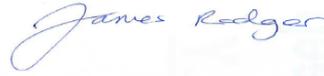
Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed:



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

Signed:



Name: James Rodger  
Position: Head of Planning, Transportation  
and Regeneration  
**London Borough of Hillingdon**

Statement of Common Ground on strategic waste matters  
between  
Westminster City Council  
and  
Kent County Council

1. Parties involved

- Westminster City Council
- Kent County Council

2. Strategic geography

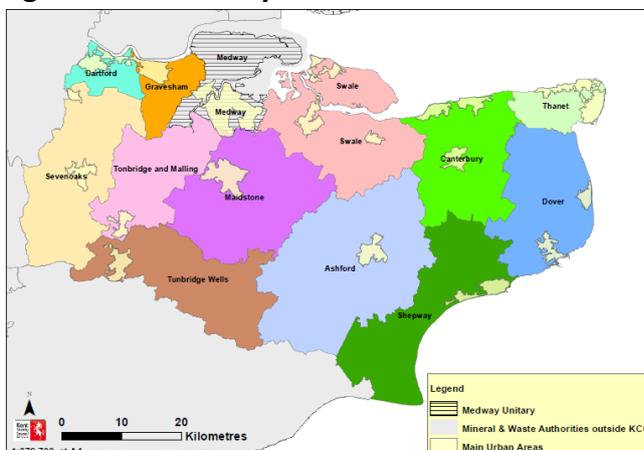
**Westminster City Council**

The City of Westminster is in Central London and covers over eight square miles and is home to many of the landmarks synonymous with ‘tourist London’. Much of Westminster is within the Central Activities Zone (CAZ) which is a designation set by the Mayor of London to guide planning policies. The City of Westminster has some of the most affluent residential areas in the country, but a diverse demographic means also some of the most deprived. It is a densely populated borough which continues to grow, and space is at a premium.

**Kent County Council**

Kent is located in the south east corner of the United Kingdom (UK). The county consists of 12 districts, as shown in Figure 1. It is surrounded on two sides by water. The River Thames to the north and the English Channel to the south-east. It also neighbours London on its north-west perimeter. It has excellent transportation links by road, rail and water with northern France, London, Essex and the South East of England. Kent is the largest non-metropolitan local authority area in England and 85% of the county is defined as rural. The Ebbsfleet Development Corporation lies in the north west of the County.

**Figure 1. The County of Kent with Local Authorities**



### 3. Strategic waste issues

The City of Westminster has no waste facilities within its borders and no designated industrial land in which to locate new facilities. Westminster exports all of its waste with the exception of a small amount of composting in the Royal Parks. Westminster is contributing towards London’s net self-sufficiency target for Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste by meeting its London Plan apportionment targets. This will be achieved through an arrangement with one of the London Boroughs with sufficient spare capacity to take on Westminster’s apportionment targets. Construction, demolition and excavation waste will continue to be exported, but developers are required to recycle 95% of C&D waste and put 95% of excavation waste to beneficial use to divert this waste stream from landfill. Hazardous waste, which forms part of these waste streams, will also continue to be exported to specialist facilities.

Planning Practice Guidance for Waste states *“Given the unique waste needs of London, there is likely to be a need for waste planning authorities surrounding London to take some of London’s waste. The Mayor and waste planning authorities in London should engage constructively, actively and on an ongoing basis with other authorities, under the duty to cooperate, to help manage London’s waste.”*

Westminster needs help to manage CD&E and hazardous waste.

Both parties agree the following thresholds to indicate ‘strategic’ waste movements:

- CD&E: 5,000 tonnes per annum
- LACW/C&I: 2,500 tonnes per annum
- Hazardous: 100 tonnes per annum

Kent receives strategic amounts of hazardous waste exports from Westminster.

Both parties agree the following figures from the Hazardous Waste Data Interrogator.

#### **Westminster’s hazardous waste exports to Kent 2014-2018 (tonnes)**

Type of waste	2014	2015	2016	2017	2018
Petrol, Gas and Coal Refining/Treatment	6	3	1	0	1
Organic Chemical Processes	0	2	0	0	0
MFSU Paints, Varnish, Adhesive and Inks	1	4	3	1	2
Photographic Industry	3	2	3	0	0
Metal Treatment and Coating Processes	0	0	1	0	0
Oil and Oil/Water Mixtures	91	55	150	144	113
Packaging, Cloths, Filter Materials	4	6	6	9	8
Not Otherwise Specified	13	12	1	47	15
C&D Waste and Asbestos	518	347	79	136	168
Healthcare	685	123	891	507	191
Municipal and Similar Commercial Wastes	54	23	2	7	9
Waste/Water Treatment and Water Industry	0	0	0	0	2

Source: Hazardous Waste Data Interrogator 2014-02018

Both parties agree there are no known planning reasons why exports of similar amounts of waste exports cannot continue for the current adopted Minerals and waste Local Plan period of 2013-30. For the avoidance of doubt, there are no strategic quantities of CD&E, C&I and LACW imported into Kent from Westminster and this is not anticipated to change.

#### 4. Governance arrangements

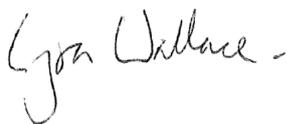
Both parties agree to monitor waste movements through Authority Monitoring Reports and engage again if these change significantly from the current trend.

Both parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Westminster.

#### 5. Signatories

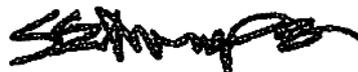
Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed:



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

Signed:



Name: Sharon Thompson  
Position: Head of Planning Applications  
**Kent County Council**

# Statement of Common Ground on strategic waste matters between Westminster City Council and London Borough of Merton

## 1. Parties involved

- Westminster City Council
- London Borough of Merton

## 2. Strategic geography

### **Westminster City Council**

The City of Westminster is in Central London and covers over eight square miles and is home to many of the landmarks synonymous with 'tourist London'. Much of Westminster is within the Central Activities Zone (CAZ) which is a designation set by the Mayor of London to guide planning policies. The City of Westminster has some of the most affluent residential areas in the country, but a diverse demographic means also some of the most deprived. It is a densely populated borough which continues to grow, and space is at a premium.

### **London Borough of Merton**

Merton is an outer London borough, situated in south west London, in the heart of the Wandle Valley. Merton is predominantly residential in character (42% of the area) but with great variations in social mix and density of development from east to west and north to south. Merton is working with the South London Boroughs of Croydon, Kingston and Sutton to plan for waste across the area.

## 3. Strategic waste issues

The City of Westminster has no waste facilities within its borders and no designated industrial land in which to locate new facilities. Westminster exports all of its waste with the exception of a small amount of composting in the Royal Parks. Westminster is contributing towards London's net self-sufficiency target for Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste by meeting its London Plan apportionment targets. This will be achieved through an arrangement with one of the London Boroughs with sufficient spare capacity to take on Westminster's apportionment targets. Construction, demolition and excavation waste will continue to be exported, but developers are required to recycle 95% of C&D waste and put 95% of excavation waste to beneficial use to divert

this waste stream from landfill. Hazardous waste, which forms part of these waste streams, will also continue to be exported to specialist facilities.

Both parties agree the following thresholds to indicate 'strategic' waste movements:

- CD&E: 5,000 tonnes per annum
- LACW/C&I: 2,500 tonnes per annum
- Hazardous: 100 tonnes per annum

Merton receives strategic amounts of CD&E waste exports from Westminster.

Both parties agree the following figures from the Waste Data Interrogator.

Westminster's recorded waste exports to Merton 2014-2018

Site name	Site type	Waste	2014	2015	2016	2017	2018
Waste Transfer And Recovery Facility (Reston)	Treatment	CDE	5,911	7,925	4,730	3,860	4,079
Other	All	All	0	0	0	0	0

Source: Waste Data Interrogator 2014-2018

Both parties agree there are no known planning reasons why exports of similar amounts of waste exports cannot continue.

#### 4. Governance arrangements

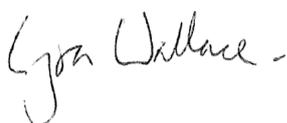
Both parties agree to monitor waste movements through Authority Monitoring Reports and engage again if these change significantly from the current trend.

All parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Westminster.

#### 5. Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed:



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

Signed:



Name: Tara Butler  
Position: Future Merton Deputy Manager  
**London Borough of Merton**

# Statement of Common Ground on strategic waste matters between Westminster City Council and London Borough of Newham

## 1. Parties involved

- Westminster City Council
- London Borough of Newham

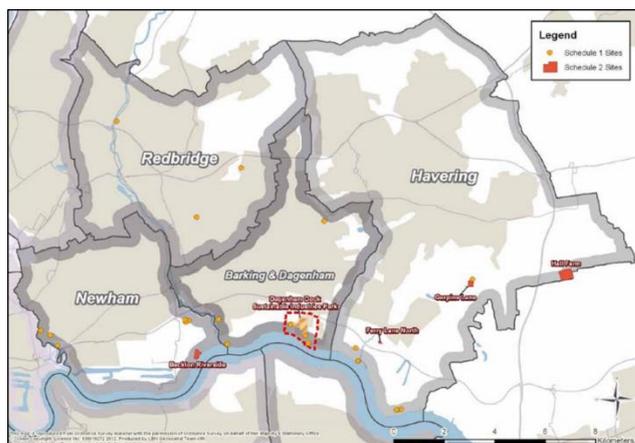
## 2. Strategic geography

### Westminster City Council

The City of Westminster is in Central London and covers over eight square miles and is home to many of the landmarks synonymous with 'tourist London'. Much of Westminster is within the Central Activities Zone (CAZ) which is a designation set by the Mayor of London to guide planning policies. The City of Westminster has some of the most affluent residential areas in the country, but a diverse demographic means also some of the most deprived. It is a densely populated borough which continues to grow, and space is at a premium.

### London Borough of Newham

Newham is an inner London Borough in the east of London with a southern boundary on the River Thames; it borders Tower Hamlets to the west (across the River Lea), Barking and Dagenham to the east (largely across the River Roding), and Waltham Forest / Redbridge (primarily) to the north. LB Newham is one of four London Boroughs who typically work together to plan for waste in the East London.



### 3. Strategic waste issues

The City of Westminster has no waste facilities within its borders and no designated industrial land in which to locate new facilities. Westminster exports all of its waste with the exception of a small amount of composting in the Royal Parks. Westminster is contributing towards London's net self-sufficiency target for Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste by meeting its London Plan apportionment targets. This will be achieved through an arrangement with one of the London Boroughs with sufficient spare capacity to take on Westminster's apportionment targets. Construction, demolition and excavation waste will continue to be exported, but developers are required to recycle 95% of C&D waste and put 95% of excavation waste to beneficial use to divert this waste stream from landfill. Hazardous waste, which forms part of these waste streams, will also continue to be exported to specialist facilities.

Both parties agree the following thresholds to indicate 'strategic' waste movements:

- CD&E: 5,000 tonnes per annum
- LACW/C&I: 2,500 tonnes per annum
- Hazardous: 100 tonnes per annum

Newham receives strategic amounts of CD&E and hazardous waste exports from Westminster.

Both parties agree the following figures from the Waste Data Interrogator.

Westminster's waste exports to Newham (East London) 2014-2018

Site name	Site type	Waste	2014	2015	2016	2017	2018
Dock Road Recycling Facility	Treatment	CDE	0	22,290	50,325	0	0
Bywaters Recycling And Recovery Centre	Treatment	HIC	17,941	0	0	0	0
Orion Support Services	Treatment	CDE	4,281	0	0	0	0
Williams Environmental Management, Silvertown	Transfer	Haz	0	0	0	127	58
Williams Environmental Management Ltd	Transfer	Haz	77	69	129	0	0
Mc Gee Asbestos Removal	Transfer	Haz	4	8	17	0	0
Other	All	All	192	73	22	23	21

Source: Waste Data Interrogator 2014-2018

Both parties agree the following figures from the Hazardous Waste Data Interrogator.

#### Westminster's hazardous waste exports to Newham (East London) 2014-2018

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
Newham	C&D Waste and Asbestos	Recovery	18,919	3,779	4,427	3,337	1,223

Source: Hazardous Waste Data Interrogator 2014-2018

Both parties note that CD&E exports from Westminster to Newham have declined to zero in recent years.

Both parties acknowledge that the Dock Road Recycling facility and the Williams Environmental Management facility identified as receiving exports from Westminster may be subject to change over Westminster's Local Plan period. Dock Road Recycling facility (Thames Wharf, E16 1AF) falls within the S08 Strategic Site under the Newham Local Plan 2018 and also within the Silvertown Tunnel Safeguarding area. Williams Environmental Management (Unit 3, Charles Street, Silvertown E16 2BY) falls within the S21 Strategic Site under the Newham Local Plan 2018. Neither facility is within a Strategic Industrial Location.

Both parties agree there are no known planning reasons why exports of similar amounts of hazardous waste cannot continue.

## 4. Waste Hierarchy and the Climate Emergency

Both parties have declared a climate emergency and acknowledge the bearing the generation and handling of waste have on this important issue (through, e.g., the emissions impacts of waste transporting and processing, including via incineration). Both parties have Local Plans (draft in Westminster's case) that work within the strategic context set by the London Plan, following the waste hierarchy and other environmental objectives that seek to (amongst other things): minimise the creation of waste; minimise CO2 emissions; improve air quality; and support the circular economy.

## 5. Governance arrangements

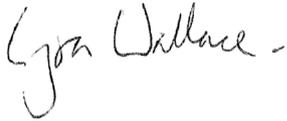
Both parties agree to monitor waste movements through Authority Monitoring Reports and engage again if these change significantly from the current trend.

Both parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Westminster.

## 6. Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed:



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

Signed:



Name: Nick Fenwick  
Position: Director of Planning &  
Development  
**London Borough of Newham**

Statement of Common Ground on strategic waste matters  
between  
Westminster City Council  
and  
The North London Boroughs

## 1. Parties involved

- Westminster City Council
- London Borough of Barnet
- London Borough of Camden
- London Borough of Enfield
- London Borough of Hackney
- London Borough of Haringey
- London Borough of Islington
- London Borough of Waltham Forest

## 2. Strategic geography

### **Westminster City Council**

The City of Westminster is in Central London and covers over eight square miles and is home to many of the landmarks synonymous with ‘tourist London’. Much of Westminster is within the Central Activities Zone (CAZ) which is a designation set by the Mayor of London to guide planning policies. The City of Westminster has some of the most affluent residential areas in the country, but a diverse demographic means also some of the most deprived. It is a densely populated borough which continues to grow, and space is at a premium.

**The North London Boroughs** The North London Boroughs cover a diverse area of London from the inner city into the Green Belt of outer London. The geographical extent takes in both the inner London Boroughs of Camden, Hackney and Islington, and the outer London Boroughs of Barnet, Enfield, Haringey and Waltham Forest. The land within the North London Boroughs spans an area of 293 square kilometres. The North London Boroughs are working together to prepare the North London Waste Plan (NLWP).

## 3. Strategic waste issues

The City of Westminster has no waste facilities within its borders and no designated industrial land in which to locate new facilities. Westminster exports all of its waste with the exception of a small amount of composting in the Royal Parks. Westminster is contributing towards London’s net self-sufficiency target for Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste by meeting its London Plan apportionment targets.

This will be achieved through an arrangement with one of the London Boroughs with sufficient spare capacity to take on Westminster’s apportionment targets. Construction, demolition and excavation waste will continue to be exported, but developers are required to recycle 95% of C&D waste and put 95% of excavation waste to beneficial use to divert this waste stream from landfill. Hazardous waste, which forms part of these waste streams, will also continue to be exported to specialist facilities.

All parties agree the following thresholds to indicate ‘strategic’ waste movements:

- CD&E: 5,000 tonnes per annum
- LACW/C&I: 2,500 tonnes per annum
- Hazardous: 100 tonnes per annum

The London Borough of Barnet receives strategic amounts of CD&E waste exports from Westminster. None of the other North London Boroughs receive strategic amounts of waste from Westminster.

All parties agree the following figures from the Waste Data Interrogator.

Westminster’s exports to Barnet (North London) 2014-2018

Site name	Site type	Waste	2014	2015	2016	2017	2018
Donoghue, Claremont Rd	Transfer (recycling)	CDE	19,917	13,838	9,403	10,079	13,725
Cricklewood North Waste Transfer Station	Transfer	CDE	0	0	0	0	3,478
Other	All	All	157	0	0	5	0

Source: Waste Data Interrogator 2014-2018

All parties acknowledge that Donoghue’s site is due to be relocated by 2025 as part of the Brent Cross Cricklewood regeneration and this could disrupt waste movements to the facility.

All parties agree there are no known planning reasons why exports of similar amounts of waste exports cannot continue to Cricklewood North Transfer Station.

#### 4. Governance arrangements

All parties agree to monitor waste movements through Authority Monitoring Reports and engage again if these change significantly from the current trend.

#### 5. Signatories

All parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed:



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

Signed:



Name: Archie Onslow  
Position: Programme Manager  
**North London Waste Plan**

Statement of Common Ground on strategic waste matters  
between  
Westminster City Council  
and  
Northamptonshire County Council

## 1. Parties involved

- Westminster City Council
- Northamptonshire County Council

## 2. Strategic geography

### **Westminster City Council**

The City of Westminster is in Central London and covers over eight square miles and is home to many of the landmarks synonymous with ‘tourist London’. Much of Westminster is within the Central Activities Zone (CAZ) which is a designation set by the Mayor of London to guide planning policies. The City of Westminster has some of the most affluent residential areas in the country, but a diverse demographic means also some of the most deprived. It is a densely populated borough which continues to grow, and space is at a premium.

### **Northamptonshire County Council**

Northamptonshire is a county at the heart of England, but has no particular alignment to any region. It has traditionally been ‘officially’ part of the East Midlands region, which includes Leicestershire and Nottinghamshire, yet Birmingham is the nearest major regional city to the county. There is also a strong affinity with the South East and East of England. Although east-west road links are good the key transport communication links, and therefore other links, are with the world city of London. Taken together the closeness of the relationships with the east, south-east and London make Northamptonshire effectively a part of the wider south-east functional area.

## 3. Strategic waste issues

The City of Westminster has no waste facilities within its borders and no designated industrial land in which to locate new facilities. Westminster exports all of its waste with the exception of a small amount of composting in the Royal Parks. Westminster is contributing towards London’s net self-sufficiency target for Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste by meeting its London Plan apportionment targets. This will be achieved through an arrangement with one of the London Boroughs with sufficient spare capacity to take on Westminster’s apportionment targets. Construction, demolition and excavation waste will continue to be exported, but developers are required

to recycle 95% of C&D waste and put 95% of excavation waste to beneficial use to divert this waste stream from landfill. Hazardous waste, which forms part of these waste streams, will also continue to be exported to specialist facilities.

Planning Practice Guidance for Waste states “Given the unique waste needs of London, there is likely to be a need for waste planning authorities surrounding London to take some of London’s waste. The Mayor and waste planning authorities in London should engage constructively, actively and on an ongoing basis with other authorities, under the duty to cooperate, to help manage London’s waste.”

Westminster needs help to manage CD&E and hazardous waste.

Both parties agree the following figures from the Hazardous Waste Data Interrogator.

#### Westminster’s hazardous waste exports to Northamptonshire 2014-2018

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
Northamptonshire	C&D Waste and Asbestos	Transfer	77	0	6	204	918
	All other	All other	24	41	7	53	14

Source: Hazardous Waste Data Interrogator 2014-2018

Northamptonshire uses a threshold of 500 tonnes per annum to indicate ‘strategic’ hazardous waste movements and the table above shows that the County receives strategic amounts of hazardous waste exports from Westminster.

Both parties agree there are no known planning reasons why exports of similar amounts of hazardous waste exports cannot continue.

#### 4. Governance arrangements

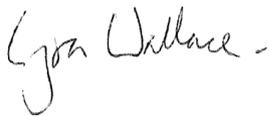
Both parties agree to monitor waste movements through Authority Monitoring Reports and engage again if these change significantly from the current trend.

Both parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Westminster.

## 5. Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed:



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

Signed:



Name: Laura Burton  
Position: Principal Planner  
**Northamptonshire County Council**

# Statement of Common Ground on strategic waste matters between Westminster City Council and Old Oak and Park Royal Development Corporation (OPDC)

## 1. Parties involved

- Westminster City Council
- Old Oak and Park Royal Development Corporation (OPDC)

## 2. Strategic geography

### **Westminster City Council**

The City of Westminster is in Central London and covers over eight square miles and is home to many of the landmarks synonymous with 'tourist London'. Much of Westminster is within the Central Activities Zone (CAZ) which is a designation set by the Mayor of London to guide planning policies. The City of Westminster has some of the most affluent residential areas in the country, but a diverse demographic means also some of the most deprived. It is a densely populated borough which continues to grow, and space is at a premium.

### **Old Oak and Park Royal Development Corporation (OPDC)**

The Old Oak and Park Royal Development Corporation (OPDC) is a Mayoral Development Corporation and local waste planning authority for parts of the Boroughs of Brent, Ealing and Hammersmith & Fulham.

## 3. Strategic waste issues

The City of Westminster has no waste facilities within its borders and no designated industrial land in which to locate new facilities. Westminster exports all of its waste with the exception of a small amount of composting in the Royal Parks. Westminster is contributing towards London's net self-sufficiency target for Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste by meeting its London Plan apportionment targets. This will be achieved through an arrangement with one of the London Boroughs with sufficient spare capacity to take on Westminster's apportionment targets. Construction, demolition and excavation waste will continue to be exported, but developers are required to recycle 95% of C&D waste and put 95% of excavation waste to beneficial use to divert this waste stream from landfill. Hazardous waste, which forms part of these waste streams, will also continue to be exported to specialist facilities.

Both parties agree the following thresholds to indicate ‘strategic’ waste movements:

- CD&E: 5,000 tonnes per annum
- LACW/C&I: 2,500 tonnes per annum
- Hazardous: 100 tonnes per annum

Applying these thresholds, the OPDC area received a strategic amount of construction demolition and excavation (CD&E) waste exports from Westminster 2014-2018.

Both parties agree the following figures from the Waste Data Interrogator.

Westminster’s waste exports to OPDC (Ealing) 2014-2018

Site name	Site type	Waste	2014	2015	2016	2017	2018
Willesden Freight Terminal	Transfer	CDE	16,155	99,402	231,979	176,101	16,729
Other	All	All	0	0	0	0	0

Source: Waste Data Interrogator 2014-2018

OPDC has confirmed that the Willesden Freight Terminal (also known as the Willesden Euroterminal) site is part of the land subject to the High Speed Two (HS2) Phase One Safeguarding Directions (plan SG-01-006), which are part of the High Speed Rail (London - West Midlands) Act 2017. HS2 have leased Willesden Euroterminal for the removal of construction spoil by rail. As such, the exports of similar amounts of waste exports is not expected to continue to be managed through the Willesden Freight Terminal for the duration of the scheduled works.

Both parties agree that the destination of waste is largely dependent on market forces and exports will continue to go the most suitable facility. Therefore it is not possible to identify a specific alternative destination for the waste currently being managed at Willesden Freight Terminal.

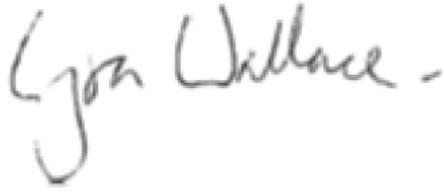
#### 4. Governance arrangements

Both parties agree to monitor waste movements through Authority Monitoring Reports and engage again, through the Duty to Co-operate if there are any significant changes to the above.

#### 5. Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed:



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

Signed:



Name: Tom Cardis  
Position: Interim Assistant Director of  
Planning  
**OPDC**

Statement of Common Ground on strategic waste matters  
between  
Westminster City Council  
and  
Southeast London Joint Waste Planning Group

## 1. Parties involved

- Westminster City Council
- London Borough of Bexley
- London Borough of Bromley
- London Borough of Lewisham
- Royal Borough of Greenwich
- London Borough of Southwark
- City of London

## 2. Strategic geography

### **Westminster City Council**

The City of Westminster is in Central London and covers over eight square miles and is home to many of the landmarks synonymous with ‘tourist London’. Much of Westminster is within the Central Activities Zone (CAZ) which is a designation set by the Mayor of London to guide planning policies. The City of Westminster has some of the most affluent residential areas in the country, but a diverse demographic means also some of the most deprived. It is a densely populated borough which continues to grow, and space is at a premium.

### **Southeast London Joint Waste Planning Group (SELJWPG)**

The Southeast London Boroughs of Bexley, Bromley, Lewisham, Greenwich and Southwark work collectively to prepare a Joint Waste Technical Paper to demonstrate how waste apportionment targets set by the London Plan will be met. The City of London subsequently joined the group, with Bexley taking responsibility for their apportionment. The Southeast London Boroughs cover a diverse area from the Central Activities Zone in the heart of London through inner London Boroughs to outer London Boroughs bordering Essex, Kent and Surrey. All boroughs but one border the River Thames and utilise safeguarded wharves for the movement of waste.

## 3. Strategic waste issues

The City of Westminster has no waste facilities within its borders and no designated industrial land in which to locate new facilities. Westminster exports all of its waste with the

exception of a small amount of composting in the Royal Parks. Westminster is contributing towards London's net self-sufficiency target for Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste by meeting its London Plan apportionment targets. This will be achieved through an arrangement with one of the London Boroughs with sufficient spare capacity to take on Westminster's apportionment targets. Construction, demolition and excavation waste will continue to be exported, but developers are required to recycle 95% of C&D waste and put 95% of excavation waste to beneficial use to divert this waste stream from landfill. Hazardous waste, which forms part of these waste streams, will also continue to be exported to specialist facilities.

All parties agree the following thresholds to indicate 'strategic' waste movements:

- LACW/C&I: 2,500 tonnes per annum
- Hazardous: 100 tonnes per annum

The Southeast London Boroughs of Bexley, Lewisham and Southwark receive strategic amounts of LACW, C&I and hazardous waste exports from Westminster.

All parties agree the following figures from the Waste Data Interrogators and Incinerator Returns.

#### Westminster's waste exports to Bexley (tonnes) 2014-2018

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
Bexley	Healthcare	Incineration	401	257	333	295	401
		Transfer	134	144	162	190	180

Source: Hazardous Waste Data Interrogator 2014-2018

All parties note that the Hazardous Waste Data Interrogator does not identify which sites receive waste and it is therefore not possible to identify which sites in Bexley receive Westminster's hazardous waste.

All parties agree that Westminster's healthcare waste is probably received at Queen Mary's in Bexley and there are no known planning reasons why movements of a similar nature cannot continue.

#### Westminster's waste exports to Lewisham 2014-2018 (tonnes)

Facility	Type of Waste	2014	2015	2016	2017	2018
SELCHP Energy Recovery Facility (Lewisham)	LACW/C&I	144,012	148,775	146,721	143,742	144,340

Source: Environment Agency Incinerator Returns

#### Westminster's waste exports to Southwark 2014-2018 (tonnes)

Site name	Site type	Waste	2014	2015	2016	2017	2018
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Southwark Integrated Waste Management Facility (Source: WDI)	Treatment	LACW/C&I	1,866	0	0	9,772	14,132
Southwark Integrated Waste Management Facility (Source: Incinerator Returns)	EfW	LACW/C&I	1,866	8,009	10,348	0	0

Source: Waste Data Interrogator and Incinerator Returns 2014-2018

All parties agree that the two waste facilities listed above are strategic and safeguarded and that there are no known planning reasons why exports of similar amounts of waste exports to these facilities in the London boroughs of Lewisham and Southwark cannot continue.

#### 4. Governance arrangements

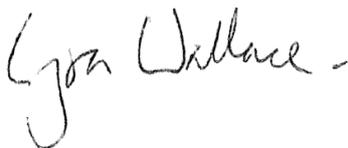
All parties agree to monitor waste movements through Authority Monitoring Reports and engage again if these change significantly from the current trend.

All parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Westminster.

#### 5. Signatories

All parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed:



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

Signed:



Name: Clare Loops  
Position: Chair  
**Southeast London Joint Waste Planning Group (SELJWPG)**

# Statement of Common Ground on strategic waste matters between Westminster City Council and Surrey County Council

## 1. Parties involved

- Westminster City Council
- Surrey County Council

## 2. Strategic geography

### **Westminster City Council**

The City of Westminster is in Central London and covers over eight square miles and is home to many of the landmarks synonymous with 'tourist London'. Much of Westminster is within the Central Activities Zone (CAZ) which is a designation set by the Mayor of London to guide planning policies. The City of Westminster has some of the most affluent residential areas in the country, but a diverse demographic means also some of the most deprived. It is a densely populated borough which continues to grow, and space is at a premium.

### **Surrey County Council**

The county of Surrey is located immediately to the south and west of Greater London. Major A roads and motorways run between the two areas. 73% of Surrey is included within the metropolitan Green Belt.

## 3. Strategic waste issues

The City of Westminster has no waste facilities within its borders and no designated industrial land in which to locate new facilities. Westminster exports all of its waste with the exception of a small amount of composting in the Royal Parks. Westminster is contributing towards London's net self-sufficiency target for Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste by meeting its London Plan apportionment targets. This will be achieved through an arrangement with one of the London Boroughs with sufficient spare capacity to take on Westminster's apportionment targets. Construction, demolition and excavation waste will continue to be exported, but developers are required to recycle 95% of C&D waste and put 95% of excavation waste to beneficial use to divert this waste stream from landfill. Hazardous waste, which forms part of these waste streams, will also continue to be exported to specialist facilities.

Planning Practice Guidance for Waste states “Given the unique waste needs of London, there is likely to be a need for waste planning authorities surrounding London to take some of London’s waste. The Mayor and waste planning authorities in London should engage constructively, actively and on an ongoing basis with other authorities, under the duty to cooperate, to help manage London’s waste.”

Westminster needs help to manage CD&E and hazardous waste.

Both parties agree the following thresholds to indicate ‘strategic’ waste movements:

- CD&E: 5,000 tonnes per annum
- LACW/C&I: 2,500 tonnes per annum
- Hazardous: 100 tonnes per annum

Surrey receives strategic amounts of CD&E and hazardous waste exports from Westminster.

Both parties agree the following figures from the Waste Data Interrogator.

Westminster’s waste exports to Surrey 2014-2018 (tonnes)

Site name	Site type	Waste	2014	2015	2016	2017	2018
Redhill Landfill (NEQ)	Landfill	HIC	0	0	0	210	1,247
Redhill Landfill (NEQ)	Landfill	CDE	0	4	1,681	0	0
Queen Mary Reservoir Recycling Facility	Treatment	CDE	0	378	2,840	0	0
Stanwell 111 Aggregate Recycling Facility	Treatment	CDE	0	0	0	2,448	0
Other	All	All	20	7	13	579	386

Source: Waste Data Interrogator 2014-2018

Both parties agree the following figures from the Hazardous Waste Data Interrogator.

Westminster’s hazardous waste exports to Surrey 2014-2018 (tonnes)

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
Surrey	C&D Waste and Asbestos	Landfill	1,149	159	59	648	137
		Recovery	0	0	0	0	120
		Treatment	3	0	0	0	63
	All other	All other	44	71	74	57	61

Source: Hazardous Waste Data Interrogator 2014-2018

Both parties agree that CD&E exports will not be able to continue to be exported to Redhill Landfill in the long-term. Redhill Landfill (also known as Patteson Court) is due to be fully

restored by 2030 and cease to accept waste as early as 2027, and it is unlikely that Westminster's waste exports will be received at this site after this date.

Stanwell 111 Aggregate Recycling Facility currently has permission until 2027. However, there is the potential for this capacity to be maintained beyond this date subject to an extension to the time limited planning permission.

Both parties agree 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 Redhill Landfill. However, there is alternative available inert void space within Surrey which can accept similar levels of inert material as 'beneficial use' to help restore mineral sites in Surrey which can be relied upon in the short to medium term.

#### 4. Governance arrangements

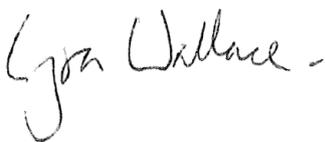
Both parties agree to monitor waste movements through Authority Monitoring Reports and engage again if these change significantly from the current trend.

Both parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Westminster.

#### 5. Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed:



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

Signed:



Name: Paul Sanderson  
Position: Minerals & Waste Policy Manager  
**Surrey County Council**

# Statement of Common Ground on strategic waste matters between Westminster City Council and Thurrock Council

## 1. Parties involved

- Westminster City Council
- Thurrock Council

## 2. Strategic geography

### **Westminster City Council**

The City of Westminster is in Central London and covers over eight square miles and is home to many of the landmarks synonymous with 'tourist London'. Much of Westminster is within the Central Activities Zone (CAZ) which is a designation set by the Mayor of London to guide planning policies. The City of Westminster has some of the most affluent residential areas in the country, but a diverse demographic means also some of the most deprived. It is a densely populated borough which continues to grow, and space is at a premium.

### **Thurrock Council**

Thurrock is situated north of the Thames, twenty miles east of central London, in South Essex, and has a population of approximately 157,000. The Borough covers 165 sq km and has a diverse range of land uses and associated environmental issues. More than half of the land in Thurrock is designated Green Belt and it has over 18 miles of riverfront.

## 3. Strategic waste issues

The City of Westminster has no waste facilities within its borders and no designated industrial land in which to locate new facilities. Westminster exports all of its waste with the exception of a small amount of composting in the Royal Parks. Westminster is contributing towards London's net self-sufficiency target for Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste by meeting its London Plan apportionment targets. This will be achieved through an arrangement with one of the London Boroughs with sufficient spare capacity to take on Westminster's apportionment targets. Construction, demolition and excavation waste will continue to be exported, but developers are required to recycle 95% of C&D waste and put 95% of excavation waste to beneficial use to divert this waste stream from landfill. Hazardous waste, which forms part of these waste streams, will also continue to be exported to specialist facilities.

Planning Practice Guidance for Waste states “Given the unique waste needs of London, there is likely to be a need for waste planning authorities surrounding London to take some of London’s waste. The Mayor and waste planning authorities in London should engage constructively, actively and on an ongoing basis with other authorities, under the duty to cooperate, to help manage London’s waste.”

Westminster needs help to manage CD&E and hazardous waste.

Both parties agree the following thresholds to indicate ‘strategic’ waste movements:

- CD&E: 5,000 tonnes per annum
- LACW/C&I: 2,500 tonnes per annum
- Hazardous: 100 tonnes per annum

Thurrock receives strategic amounts of HIC, CD&E and hazardous waste exports from Westminster.

Both parties agree the following figures from the Waste Data Interrogator.

Westminster’s waste exports to Thurrock 2014-2018 (tonnes)

Site name	Site type	Waste	2014	2015	2016	2017	2018
Bluelands Quarry	On/In Land	CDE	0	0	0	20,934	19,682
East Tilbury Quarry	Landfill	CDE	758	2,517	83	15,204	15,683
East Tilbury Quarry	Transfer	CDE	5,553	2,972	2,502	1,573	10,661
Land At North Tilbury	On/In Land	CDE	65,800	400	0	0	0
Ockendon Area II & III Landfill	Landfill	CDE	0	0	0	22,561	45,040
Brocks Haulage	Treatment	CDE	0	1,053	978	3,405	0
Juliette Way Materials Recycling & WEEE ATF	Treatment	HIC	3,179	3,613	4,476	4,893	4,769
Other	All	All	0	0	0	0	0

Source: Waste Data Interrogator 2014-2018

Both parties agree the following figures from the Hazardous Waste Data Interrogator.

Westminster’s hazardous waste exports to Thurrock 2014-2018 (tonnes)

WPA	Type of waste	Management route	2014	2015	2016	2017	2018
Thurrock	C&D Waste and Asbestos	Transfer	56	177	129	198	197

	All other	All other	2	1	2	2	4
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Source: Hazardous Waste Data Interrogator 2014-2018

Both parties agree that the site known as Land at North Tilbury no longer receives waste. Bluelands Quarry is unlikely to receive waste beyond 2020 as the quarry has been filled to a level that development for employment purposes can commence and East Tilbury Quarry is likely to close by end 2020. Therefore it is unlikely that Westminster’s CD&E waste exports will be received at East Tilbury Quarry after that time.

Both parties agree 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 Thurrock’s landfill sites. 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 landfill in Thurrock.

Both parties agree there are no known planning reasons why exports of a similar amount cannot continue to be received at the other sites receiving CD&E waste from Westminster.

Both parties agree there are no known planning reasons why exports of similar amounts of hazardous waste exports cannot continue.

#### 4. Governance arrangements

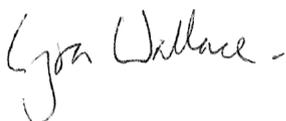
Both parties agree to monitor waste movements through Authority Monitoring Reports and engage again if these change significantly from the current trend.

Both parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Westminster.

#### 5. Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed:



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

Signed:



Name: Richard Hatter  
 Position: Strategic Planning Manager  
**Thurrock Council**

Statement of Common Ground  
on strategic waste matters between  
Westminster City Council,  
Royal Borough of Windsor and Maidenhead  
and Wokingham Borough Council

## 1. Parties involved

### 1.1 The parties involved are

- Westminster City Council
- Royal Borough of Windsor and Maidenhead
- Wokingham Borough Council

## 2. Strategic geography

### **Westminster City Council**

2.1 The City of Westminster is in Central London and covers over eight square miles and is home to many of the landmarks synonymous with 'tourist London'. Much of Westminster is within the Central Activities Zone (CAZ) which is a designation set by the Mayor of London to guide planning policies. The City of Westminster has some of the most affluent residential areas in the country, but a diverse demographic means also some of the most deprived. It is a densely populated borough which continues to grow, and space is at a premium.

### **Wokingham Borough Council**

2.2 Wokingham Borough Council lies to the west of London in the county of Berkshire. Wokingham is working with Bracknell Forest Council, Reading Borough Council and the Royal Borough of Windsor and Maidenhead (collectively referred to as 'Central and Eastern Berkshire Authorities') to produce a Joint Minerals and Waste Plan which will guide minerals and waste decision-making in the area.

### **Royal Borough of Windsor and Maidenhead**

2.3 The Borough lies to the west of London providing a predominantly countryside setting for the three main settlements of Maidenhead, Windsor and Ascot, and a number of neighbouring villages. Pressure for development comes from a number of sources including a changing and growing population with a shifting demand for different types of housing and infrastructure.

### 3 Strategic waste issues

3.1 The City of Westminster has no waste facilities within its borders and no designated industrial land in which to locate new facilities. Westminster exports all of its waste with the exception of a small amount of composting in the Royal Parks. Westminster is contributing towards London's net self-sufficiency target for Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste by meeting its London Plan apportionment targets. This will be achieved through an arrangement with one of the London Boroughs with sufficient spare capacity to take on Westminster's apportionment targets. Construction, demolition and excavation waste will continue to be exported, but developers are required to recycle 95% of C&D waste and put 95% of excavation waste to beneficial use to divert this waste stream from landfill. Hazardous waste, which forms part of these waste streams, will also continue to be exported to specialist facilities.

3.2 Planning Practice Guidance for Waste states "Given the unique waste needs of London, there is likely to be a need for waste planning authorities surrounding London to take some of London's waste. The Mayor and waste planning authorities in London should engage constructively, actively and on an ongoing basis with other authorities, under the duty to cooperate, to help manage London's waste."

3.3 Westminster needs help to manage CD&E and hazardous waste.

3.4 All parties agree the following thresholds to indicate 'strategic' waste movements:

- CD&E: 5,000 tonnes per annum
- LACW/C&I: 2,500 tonnes per annum
- Hazardous: 100 tonnes per annum

3.5 Both Windsor & Maidenhead and Wokingham receive strategic amounts of hazardous waste exports from Westminster.

3.6 All parties agree the following figures from the Waste Data Interrogator.

Table 1: Waste exports from Westminster 2014-2018 (tonnes)

Destination	Site name	Site type	Waste	2014	2015	2016	2017	2018
Windsor & Maidenhead	Kingsmead Landfill	Landfill	CDE	0	0	0	0	8,172
Windsor & Maidenhead	Other	All	All	0	0	0	0	0

Source: Waste Data Interrogator 2014-2018

3.7 All parties agree there are no known planning reasons why exports of similar amounts of CD&E waste exports cannot continue to Kingsmead landfill site in Horton until this site is fully restored.

3.8 All parties agree the following figures from the Hazardous Waste Data Interrogator.

Table 2: Hazardous waste exports from Westminster 2014-2018 (tonnes)

Destination	Type of waste	Fate	2014	2015	2016	2017	2018
Windsor & Maidenhead (Wokingham)	Healthcare	Transfer	91	91	96	91	91
		Treatment	399	425	455	446	482
	All other	All other	0	0	0	0	0

Source: Hazardous Waste Data Interrogator 2014-2018

3.9 All parties agree that the clinical waste facility (Star Works treatment facility) which receives Westminster's healthcare waste is located in Wokingham, but the site entrance is within Windsor & Maidenhead and the Hazardous Waste Data Interrogator therefore records the waste as being received in Windsor & Maidenhead.

3.10 The Star Works site includes landfill and waste treatment operations.

3.11 The landfill operation has planning permission until 2020 with restoration completed in 2021. The operator has submitted an application to extend the operational time period to January 2022 with restoration to January 2023. The application is currently pending, and has attracted significant levels of objection. All parties agree that the landfill operation will cease in the near future and cannot be relied on to receive future waste exports.

3.12 'A separate part of the site has a B2 use classification and this part of the site has been in use for the treatment of clinical waste by steam since 2004. No party is aware of any reason why the site cannot be relied on to continue to receive waste for treatment.'

## 4 Governance arrangements

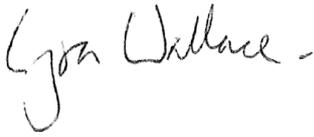
4.1 All parties agree to monitor waste movements through Authority Monitoring Reports and engage again if these change significantly from the current trend.

4.2 All parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Westminster.

## 5 Signatories

5.1 All parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed:



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

Signed:



Name: Chris Traill  
Position: Director Place and Growth  
**Wokingham Borough Council**

Signed:



Name: Councillor David Coppinger  
Position: Lead Member for Planning and Maidenhead  
**Royal Borough of Windsor & Maidenhead**