

# CITY PLAN 2019 – 2040

**WASTE**

EVIDENCE

JUNE 2019



## Executive summary

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

Like all local authorities Westminster's waste management is governed by European, national and local policy. However, unlike other local authorities we have no waste management facilities of our own which presents a further challenge in managing our different waste streams. The overarching policy ambition is clear: To work towards more sustainable and effective waste management. Waste prevention sits at the top of our Waste Hierarchy; at the bottom is disposal which should be a last resort.

Currently, household waste represents 47% of the council's collected waste. Figures show collected household waste per person has dropped from 402 kg in 2012-13 to 367 kg in 2016-17. Residual household waste has been reasonably stable over recent years averaging around 600 kg per household.

The London Plan's objective that 100% of waste will be managed within London by 2026 has seen us working towards zero biodegradable or recycle bale waste to landfill. Although, reuse, recycling and composting rates for household waste saw a slight drop to 17.4% in 2016-17, there have been significant improvements in waste sent to landfill. In 2016-17 less than 2% of municipal waste was sent to landfill compared to that of 13.5% in 2010-11. There has been a significant reduction in municipal solid waste being sent to landfill from 33% to 3% in 2012/13. The majority of Westminster's waste (82%) is dealt with via 'Energy from Waste'. These reductions show that the council is achieving the objectives set out in the waste hierarchy in this stream.

In terms of commercial waste, the most recent survey in 2009 estimated that of the 527 tonnes produced in Westminster, half was recycled or composted, whilst around a third was sent to landfill. However, it projected that by 2020, a 70% increase in

recycling and composting would see commercial waste sent to landfill drop to around 327 tonnes.

Whilst these figures are positive, the London Plan has set an Apportionment Figure target for household, commercial and industrial waste to each borough in order that land is identified and allocated accordingly to manage London's waste. Projections show that a significant amount of London's commercial and industrial waste will continue to be generated in Westminster, giving rise to higher figures in 2036. This coupled the Mayor's self-sufficiency objective gives Westminster a higher apportionment figure of 2.3%.

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

As per The National Planning Policy for Waste (2014) local authorities must work jointly in managing waste with each borough preparing their own Local Plan to identify waste management opportunities. As Westminster is a net exporter of waste, 60 waste planning authorities have imported waste from us over the period 2013/2014 to 2015/2016. In addition to the 2716 tonnes of waste being produced and treated here, an additional 872 tonnes of waste were imported from other London Boroughs (primarily treated via composting on the Royal Parks). Taking this into account along with the draft London Plan forecasting a rise in household, commercial and industrial waste, an even more robust approach to identifying waste management opportunities is required.

Although evidence for the Westminster Core Strategy (2009) concluded that there were no suitable sites available for waste facilities in Westminster, policy for waste planning has seen major changes on both European, national and regional levels. New criteria for assessing site suitability set out in The National Planning Policy for Waste (2014) advocates that a broad range of locations be considered with priority given to previously developed land, redundant agricultural and forestry buildings and sites identified for employment uses. The London Plan builds on this and looks to

identify sites in strategic industrial locations and locally significant employment areas. A sieve analysis was carried out to consider the provision of waste facilities amongst other land uses. This identified that there is no capacity for waste management facilities in Westminster.

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

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# 1 Introduction and context

## 1.1 Purpose of this document

This is an evidence base document supporting Westminster's City Plan that demonstrates how waste has been considered alongside other land use priorities. It analyses trends and issues regarding different waste streams and seeks to identify future opportunities to manage waste in the city.

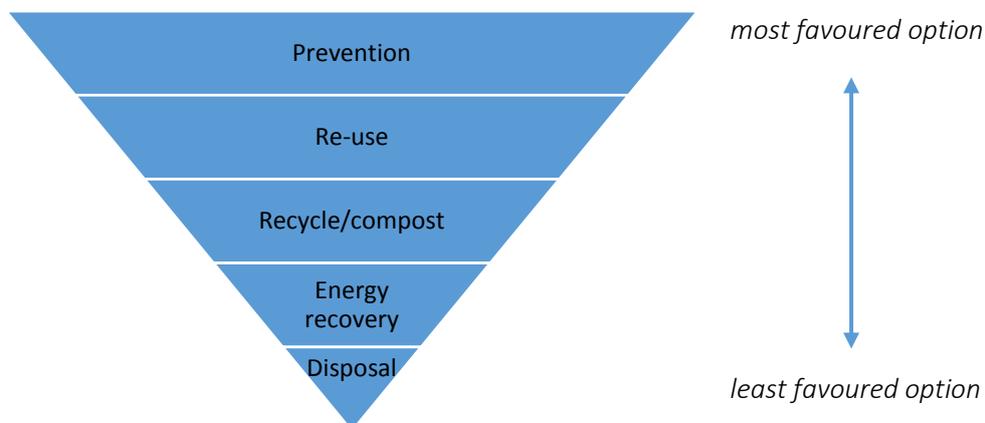
This section will further explore the relevant policy context for waste planning. Section 2 will present the performance across different waste streams. Section 3 considers future waste management needs including the consideration of potential sites. The next steps will be presented in section 4.

## 1.2 EU Policy

### 1.2.1 European Revised Waste Framework Directive

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

Figure 1 Waste hierarchy



## 1.3 National policy

### 1.3.1 Waste Management Plan for England

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

### 1.3.2 National Planning Policy for Waste

The National Planning Policy for Waste (NPPW) was established in 2014 and sets out detailed waste planning policies. This includes requirements for the evidence base of Local Plans and for the identification of suitable sites and areas.

The NPPW states that Waste Planning Authorities should prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams. Waste Planning Authorities in London should have regard to their apportionments set out in the London Plan when preparing their Local Plans. The NPPW also sets out the requirement to work jointly with other planning authorities.

## 1.4 Regional policy

### 1.4.1 The London Plan

The London Plan is the Spatial Strategy for London. It contains planning policies that boroughs should have regard to when making planning decisions and when preparing Local Plans. The Mayor of London is currently preparing a new London Plan.

The London Plan sets out that boroughs should provide sufficient capacity to manage the tonnages of waste apportioned in the plan. The tables below show the apportionments for Westminster in the current London Plan (March 2016) as well as the Draft London Plan (November 2017).

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

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

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

	2021	2041
<b>HH &amp; CI</b>	188	199

The London Plan also contains targets for recycling/composting of different waste streams. The Mayor aims to manage the equivalent of 100% of London's waste within London by 2026.

## 1.5 Local policy and strategies

### 1.5.1 Westminster Municipal Waste Management Strategy

The Municipal Waste Strategy (2014) sets out how municipal waste will be managed between 2016-2031. It does not cover commercial or industrial waste collected by other organisations within Westminster.

### 1.5.2 Westminster City Plan

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

In accordance with the Local Development Scheme and the Regulation 18 notice published in March 2015, a separate waste review to the City Plan will be prepared following the adoption of the full City Plan review.

## 2 Existing waste management

### 2.1 Introduction

There are no strategic waste management facilities in the city. Westminster is a net exporter of waste, with contracts in place to manage different waste streams.

Analysis of National Waste Indicators<sup>1</sup> in Westminster from 2010/11 to 2016/17 shows that residual household waste per household has been reasonably stable over recent years around 600 kg per household. However, collected household waste per person has come down to 367 kg in 2016/17 from 402 kg in 2012-13. Reuse, recycling and composting rates for household waste have slightly declined to 17.4% in 2016/17. Albeit overall municipal waste recycling rates have increased. Positive is that under 2% of municipal waste is sent to landfill compared to 13.5% in 2010/11.

The following sections will describe how different waste streams are currently being managed in Westminster.

### 2.2 Municipal Solid Waste

Municipal Solid Waste (MSW) is managed by Westminster City Council as the local waste authority. The majority of waste collected is from commercial and street cleansing sources, which is unlike other local authorities in the UK. Household waste currently represents 47% of the council's collected waste<sup>2</sup>.

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

Table 3 Municipal Solid Waste by tonnes and percentages

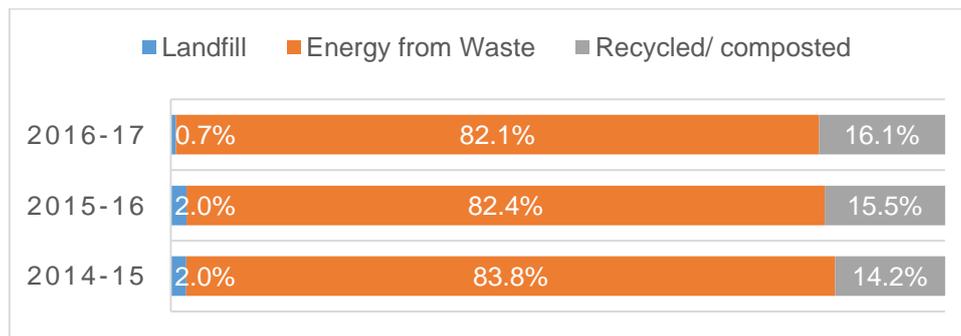
	2014-15		2015-16		2016-17	
	tonnes	%	Tonnes	%	tonnes	%
<b>Landfill</b>	3772	2.0%	3976	2.0%	1303	0.7%
<b>Energy from Waste</b>	158087	83.8%	160638	82.4%	158451	82.1%
<b>Recycled/ composted</b>	26763	14.2%	30232	15.5%	31029	16.1%
<b>Other</b>	20	0.0%	21	0.0%	17	0.0%
<b>Total</b>	188643	100%	194867	100%	193100	100%

There has been a decline in MSW sent to landfill, which accounts for less than 1% of the total MSW in 2016-17. Recycling and composting has steadily increased, accounting for 16%. The majority of MSW remains being sent to Energy from Waste at 82%. The total tonnes collected have slightly decreased over 2016-17 following a strong increase the year before.

<sup>1</sup> Department for Environment, Food & Rural Affairs 2016-17

<sup>2</sup> Department for Environment, Food & Rural Affairs 2016-17

Figure 2 Municipal Solid Waste trends (WDI, 2016)



### 2.3 Commercial and industrial waste

The most recent survey of commercial and industrial (C&I) waste arising took place in 2009<sup>3</sup>. This survey estimated that a total of 527,000 tonnes of C&I waste was produced in Westminster. Half of this was recycled or composted, whilst around a third was sent to landfill.

Table 4 Commercial and Industrial Waste in 2009 (Defra, 2011)

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

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

Table 5 Projected Commercial and Industrial Waste 2020 (Defra, 2011)

	Tonnage	Percentage
<b>Recycled / composted</b>	139,000	70%
<b>Incineration / other treatment</b>	118,000	19%
<b>Landfill</b>	70,000	11%
<b>Total</b>	327,000	100%

### 2.4 Construction, demolition and excavation waste

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

The Waste Data Interrogator shows that over 2015/16, 378.303 tonnes of CD&E waste was produced in Westminster. The London Borough of Ealing (West London

<sup>3</sup> DEFRA: Commercial and Industrial Waste Survey 2009 Final Report, 2011

Waste Authority) is with 61% the major receiver of CD&E waste from Westminster, from where it is transferred to other locations.

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

## 2.5 Hazardous wastes

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

Table 6 Hazardous waste (WDI, 2014/15/16)

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

## 2.6 Wastewater and sewage sludge

Thames Water manages sewerage infrastructure in London and is responsible for wastewater and sewage sludge treatment. In 2010, Thames Water estimated that 1000 tonnes of fat and oil were disposed illegally through the London sewer network<sup>4</sup>.

Westminster's wastewater is treated at Beckton Waste Water Treatment Plant (WWTP) in the London Borough of Newham (East London Waste Authority). This facility also serves other London Boroughs north of the Thames, serving an estimated 3.6 million customers. Sewage sludge from the treatment process, around 120,000 tonnes per annum is treated on-site in an EFW facility which converts it into power which is used to run the WWTP. Large waste items such as plastic bags, newspapers, disposable single use items, wood, leaves etc are screened from the incoming flow and sent to landfill, presumed at Rainham or Pitsea.

A combined sewer system exists dating to the Victoria era. It carries both waste water from homes and businesses and rainfall. It was designed for a city of 4 million but now carries the waste water of a city of over 8M. Waste water from Westminster flows via the local sewer network into one of 3 major tunnels that convey it to Beckton for treatment. The system has dedicated combined sewer overflow (CSO) points into the River Thames that become active when rainfall overwhelms the conveyance capacity of the sewer system. There are 6 such CSOs along the Thames in Westminster. It carries both waste water from homes and businesses and rainfall. The Thames Tideway Tunnel is currently under construction and has the aim

<sup>4</sup> Municipal Waste Management Strategy 2016-2031

to reduce CSO spills into the river by capturing them and storing them until they can be treated at Beckton. Thames Water is not envisaging any further investment to accommodate for new development.

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

## 2.7 Low level radioactive waste

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

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

## 2.8 Agricultural waste

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

## 2.9 Cross boundary movement of waste

The Environment Agency's Waste Data Interrogator (WDI) provides data on the movements of waste between waste planning authority areas. The WDI is based upon information supplied by returns for sites operating under waste management licenses. As not all movements to those facilities exempt from waste management licencing are reported, the picture provided by the WDI may be partial in some cases.

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

A total of 60 waste planning authorities have imported waste from Westminster over the period 2013/2014 to 2015/2016. Appendix 1 provides a detailed overview of waste planning authorities that received waste from Westminster over this period. As the amount of waste fluctuates each year, data is show for the last three monitoring periods to provide a comprehensive and robust picture of cross boundary movements of waste.

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

In terms of hazardous waste, Essex County Council (28%), the London Borough of Newham (24%) and Hertfordshire County Council (20%) receive a significant proportion of waste. A complete overview is provided in Appendix 2.

### 3 Future waste management

#### 3.1 Future needs for the management of waste

##### 3.1.1 The London Plan

The London Plan (2016) sets out the ambition to be self-sufficient with regards to the management of waste by 2026. This includes working towards zero biodegradable or recyclable bale waste to landfill by 2026. To help achieve this, the London Plan has given a target (called the 'apportionment' figure) to manage a share of the household and commercial & industrial waste to each borough. Boroughs must allocate sufficient land and identify waste management facilities to provide capacity to manage their waste apportionment.

The London Plan also sets out household and commercial & industrial waste projections at borough level through to 2036 (see Table 3). These waste projections do not include construction, demolition and excavation waste. However, hazardous wastes from household and commercial & industrial sources are included.

Table 7 London Plan (2016) waste projections (thousand tonnes pa)

	2016	2021	2026	2031	2036
<b>Household</b>	93	95	97	100	102
<b>Commercial &amp; Industrial</b>	582	580	581	586	593
<b>Total</b>	675	675	678	686	695

The projections show that a significant amount of London's commercial and industrial waste will continue to be generated in Westminster, and exceeding household waste. It projects that the waste arising in Westminster will slightly rise up to 2036.

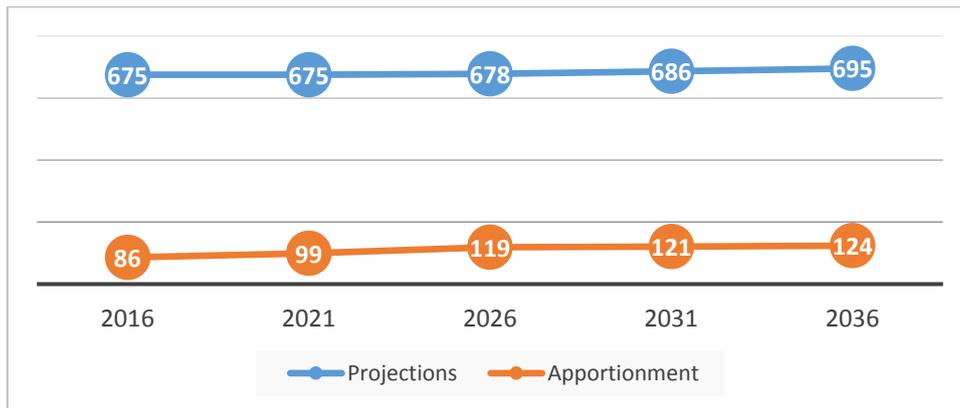
The apportionment figures for Westminster are set out below. It is not necessary to meet the waste apportionment figures for household and commercial & industrial waste individually, but as an aggregate figure.

Table 8 London Plan (March 2016) waste apportionment for Westminster (thousand tonnes per annum)

	2016	2021	2026	2031	2036
<b>Household</b>	34	41	50	52	53
<b>Commercial &amp; Industrial</b>	52	58	69	70	70
<b>Total</b>	86	99	119	121	124

Westminster has been apportioned to manage 1.5% of the total amount of waste generated in London. The apportionment figures are set to increase significantly over the next decades.

Figure 3 Apportionment in relation to forecasted waste arisings (thousand tonnes)



### 3.1.2 The Draft London Plan (2017)

The draft London Plan also forecasts the arisings of household and commercial & industrial waste, based on up-to-date evidence (see Table 4). No longer is separate projections are made for household and commercial & industrial waste – instead they are combined into a single figure.

Table 9 Draft London Plan (2017) waste projections (thousand tonnes pa)

	2021	2041
<b>Household and Commercial &amp; Industrial</b>	722	750

The projected figures for 2021 are an increase with respect to the current London Plan forecasts, which will further increase up to 2041.

The apportionment figures in the draft London Plan are set out below.

Table 10 Draft London Plan (2017) waste apportionment for Westminster (thousand tonnes per annum)

	2021	2041
<b>Household and Commercial &amp; Industrial</b>	188	199

The draft London Plan sets out a significantly higher apportionment figure for Westminster. This is not only the result of a greater amount of waste to be managed in London as a result of revised projections and self-sufficiency ambitions, but also as the apportionment for Westminster has increased to 2.3%.

## 3.2 Consideration of sites and areas

### 3.2.1 Introduction

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

Since the preparation of the Core Strategy, the policy context for waste planning has seen major changes on both European, national and regional levels. This includes

the detailed criteria for site selection in the National Planning Policy for Waste. In this light, it is important to re-evaluate potential sites to determine if there is any capacity in Westminster to locate waste management facilities.

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

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

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

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

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

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

### 3.2.2 Identification of all potential sites and areas

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

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

The potential typologies of land set out in national and London policy mentioned above are to be considered below. It must be noted that it is by no means suggested that any of these sites are suitable for waste management facilities at this stage of the process.

### 3.2.2.1 Strategic Industrial Locations

There are no Strategic Industrial Locations in Westminster.

### 3.2.2.2 Locally Significant Employment Areas

There are no Locally Significant Employment Areas in Westminster.

### 3.2.2.3 Existing waste sites

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

### 3.2.2.4 Other industrial land

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

### 3.2.2.5 Wharves

There are no wharves in Westminster.

### 3.2.2.6 Previously developed land

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

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

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

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

Table 114 Waste potential sites considered by type

Waste potential sites identified by type		Number of facilities / sites
<b>Existing waste facilities</b>		158
<b>Of which:</b>	In Vessel Composter (decommissioned)	1
	Street Cleansing Depot	12
	Micro Recycling Centre	145
<b>Previously developed land</b>		1,405
<b>Of which:</b>	Key development sites (New City Plan)	47
	Sites with “unimplemented planning permission”	756

	Sites that are under construction	501
	Sites in the “Brownfield Register” (2017)	101

### 3.2.3 Waste site sieve analysis

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

For the purpose of the site sieve analysis, the site selection criteria from the National Planning Policy for Waste and the London Plan have been refined in line with best practice and made locally applicable and measurable. Particular regard has been given to the locational criteria in Appendix 2 of the National Planning Policy for Waste.

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

Table 12 Site sieve criteria

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

The results of the site sieve analysis can be found Appendix 3. A total number of 52 sites were carried forward to the following stage, some of them only falling partially within the areas with potential and are classified as follows:

Table 135 Waste potential sites considered by type (post sieve analysis)

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

### 3.2.4 Detailed site analysis

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

#### 3.2.4.1 Technical feasibility

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

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

#### 3.2.4.2 Availability and planning issues

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

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

These criteria are set out below:

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

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

The results of the detailed planning issues analysis can be found in Appendix 3. No sites were considered suitable as a result of this assessment.

### 3.2.5 Results

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

## 4 Next steps

This evidence base study for the Westminster City Plan has identified how is planned across different waste streams, and has sought to identify any capacity for waste facilities in Westminster to take account of future needs and requirements.

Westminster is generally performing well across waste streams, with a reduction of waste going to landfill and increased recycling and re-use. Waste is increasingly being driven up the waste hierarchy.

It is concluded that there is limited capacity for waste facilities of a strategic nature in Westminster. The council therefore must continue to rely on waste management capacity beyond its boundaries.

The council is committed to working with all waste planning authorities that manage a strategic amount of Westminster's waste, to make sure arrangements are made to manage waste produced in Westminster in the future. The council will also work with other London Boroughs and the Mayor of London regarding the potential pooling of the London Plan waste apportionment. This continuous and effective engagement will inform the next stages of preparation of Westminster's City Plan.

## Appendix 1 Waste destinations

Table 14 Destinations of Westminster's waste (WDI 2014/15/16)

Destination	2013/14	2014/15	2015/16	Total 3 year period	%
Ealing WPA	16154.58	99401.562	231978.557	347534.699	35.6%
Kent WPA	129556.399	37.719	31.335	129625.453	13.3%
Newham WPA	22494.926	22440.273	50492.869	95428.068	9.8%
Thurrock WPA	75289.408	10555.743	8038.616	93883.767	9.6%
Hertfordshire WPA	1277.679	36038.213	10614.88	47930.772	4.9%
Brent WPA	17868	15326	13018	46212	4.7%
Barnet WPA	20073.68	13838.18	9402.605	43314.465	4.4%
Greenwich WPA	6157.78	12641.42	16570.16	35369.36	3.6%
Essex WPA	7019.485	2428.585	16898.961	26347.031	2.7%
Merton WPA	5910.584	7925.377	4729.547	18565.508	1.9%
Havering WPA	7479.08	4646.64	6277.7	18403.42	1.9%
Hillingdon WPA	14156	510	2925	17591	1.8%
Barking and Dagenham WPA	6264.105	5581.707	4791.972	16637.784	1.7%
Wandsworth WPA	1498.74	5809.82	3586.86	10895.42	1.1%
Slough WPA	2752.91	2968.15	3581.06	9302.12	1.0%
Westminster City WPA		2368.12	2715.988	5084.108	0.5%
Surrey WPA	19.735	388.946	4534.205	4942.886	0.5%
Southwark WPA	1865.75			1865.75	0.2%
Buckinghamshire WPA		190.14	1593.35	1783.49	0.2%
Milton Keynes WPA	584.98	18.06	1072.4	1675.44	0.2%
Wiltshire WPA		85.12	390.82	475.94	0.0%
Dorset WPA	450			450	0.0%
Enfield WPA	91.76	58.28	221.74	371.78	0.0%
Waltham Forest WPA	120.076	119.599	51.9	291.575	0.0%
Warrington WPA	106.51	135.689		242.199	0.0%
Lewisham WPA	96.2		123.1	219.3	0.0%
Wokingham WPA	60.845	65.578	50.316	176.739	0.0%
Warwickshire WPA	4.81	28.233	106.226	139.269	0.0%
Northamptonshire WPA	0.15	0.015	132.46	132.625	0.0%
West Sussex WPA		65.6	32	97.6	0.0%
Halton WPA			97.208	97.208	0.0%
Bolton WPA	50.82	3.277	2.64	56.737	0.0%
Birmingham City WPA		2.647	40.437	43.084	0.0%
Staffordshire WPA	0.44	21.385	21.201	43.026	0.0%
Manchester WPA			41.555	41.555	0.0%
Bedford WPA	15.727	13.464	11.242	40.433	0.0%
Central Bedfordshire WPA	20	20		40	0.0%
Cambridgeshire WPA			36.117	36.117	0.0%
Hampshire WPA	6.84	1.585	24.068	32.493	0.0%
Sandwell WPA	13.18	4.905	9.708	27.793	0.0%

<b>Tower Hamlets WPA</b>	2.74	16.851	5.234	24.825	0.0%
<b>Bristol City WPA</b>	20.164	0.04	2.873	23.077	0.0%
<b>Nottingham City WPA</b>	22.042			22.042	0.0%
<b>West Berkshire WPA</b>	6.4	15.28	0.2	21.88	0.0%
<b>Medway WPA</b>	7.66	2.149		9.809	0.0%
<b>Norfolk WPA</b>		0.1	8.066	8.166	0.0%
<b>Oxfordshire WPA</b>	7.145	0.72		7.865	0.0%
<b>Sheffield WPA</b>	6.07		0.49	6.56	0.0%
<b>Knowsley WPA</b>	0.988	3.433	1.681	6.102	0.0%
<b>Croydon WPA</b>			4.529	4.529	0.0%
<b>Gloucestershire WPA</b>		0.12	3.34	3.46	0.0%
<b>Salford WPA</b>			3	3	0.0%
<b>Stockton-on-Tees WPA</b>	2.67			2.67	0.0%
<b>Cheshire West and Chester WPA</b>	1.82			1.82	0.0%
<b>Reading WPA</b>	1.695			1.695	0.0%
<b>Suffolk WPA</b>	1.602			1.602	0.0%
<b>Leicestershire WPA</b>	0.234	0.029	0.482	0.745	0.0%
<b>Lincolnshire WPA</b>	0.24	0.2		0.44	0.0%
<b>Coventry WPA</b>		0.1	0.1	0.2	0.0%
<b>Trafford WPA</b>	0.014			0.014	0.0%
<b>Peterborough WPA</b>	0.011			0.011	0.0%

## Appendix 2 Hazardous waste destinations

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

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

## Appendix 3 Site analysis

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

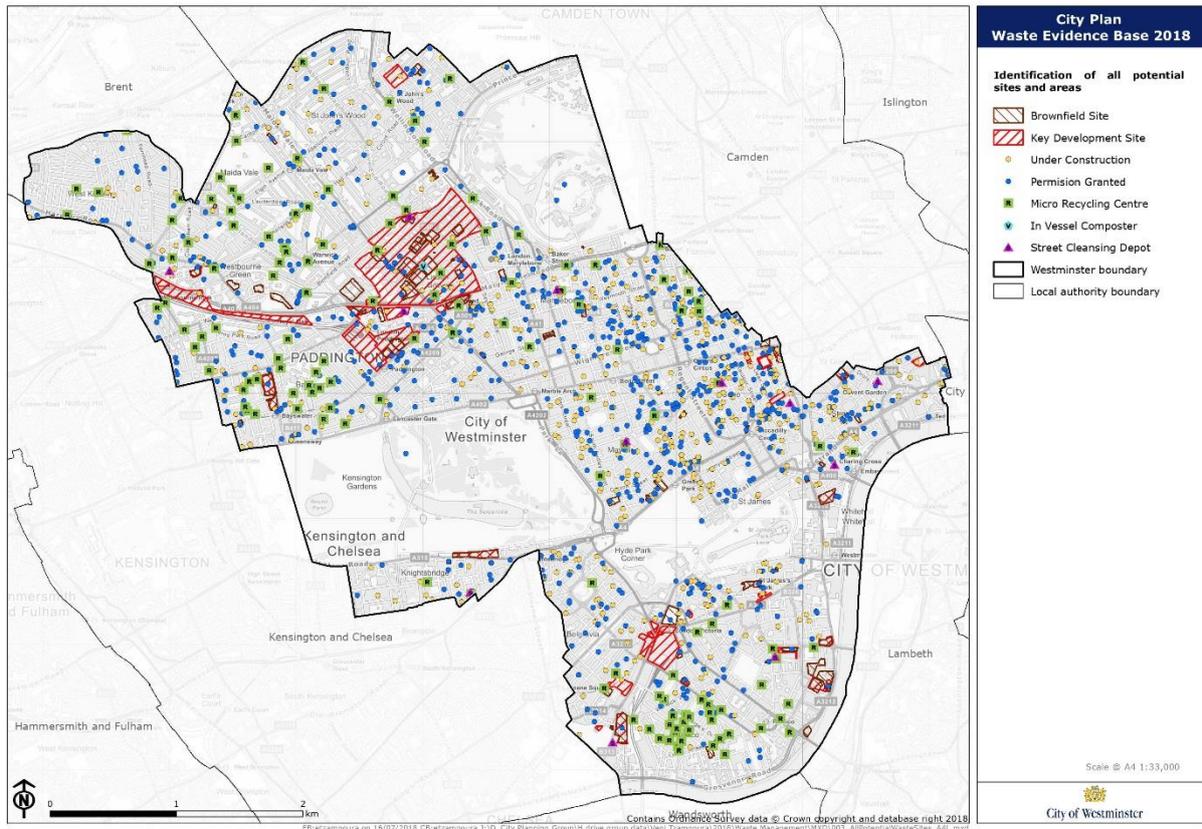


Figure 5 Constraints for sieve analysis (stage 2)

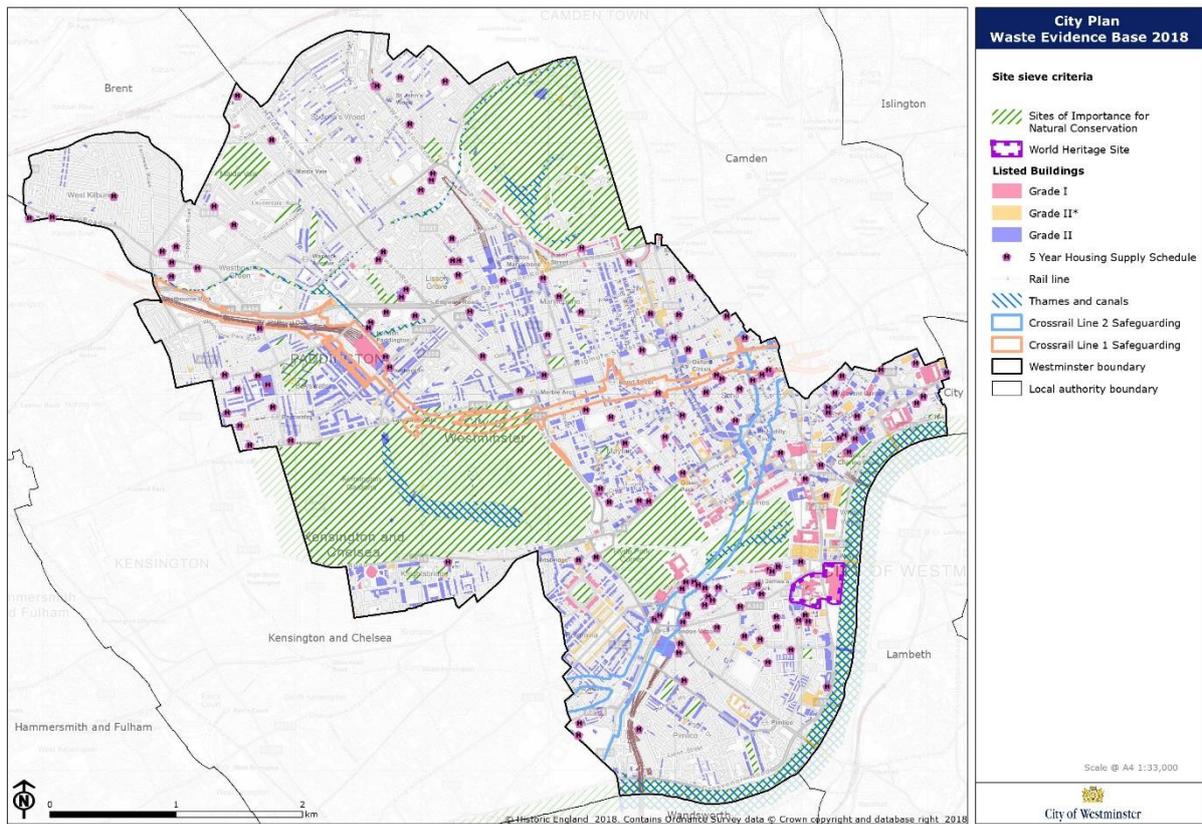


Figure 6 Waste site sieve analysis results (stage 2)

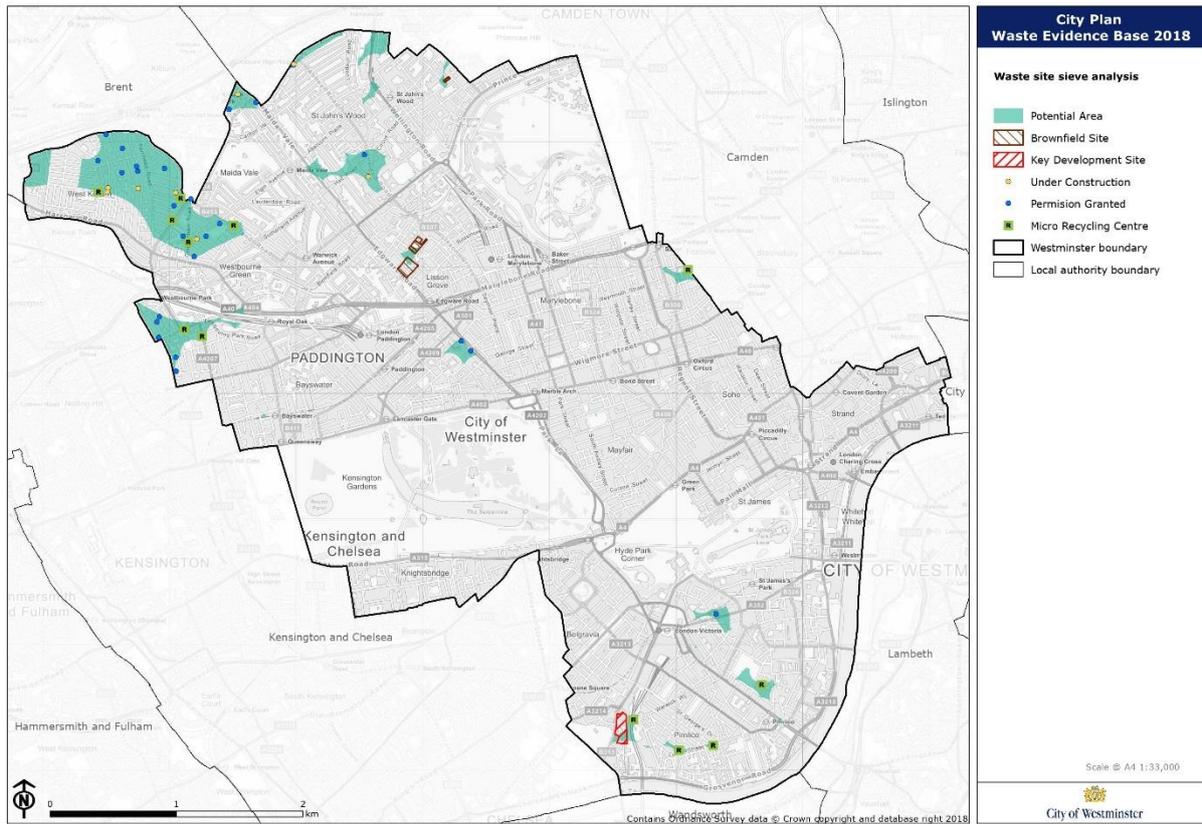


Table 16 Waste site technical feasibility analysis (stage 3)

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

Table 17 Waste site technical feasibility and availability analysis (stage 3)

Address	Planning issues and availability
<b>Tollgate Gardens Estate</b>	The Tollgate Gardens Estate site only partially complies with the criteria set out at stage 2 (see map 3). Accordingly, only part of the site can be considered as potential land. The area is currently under development as planning permission was granted in November 2013 for the regeneration of the whole estate. New terraces will accommodate new homes and a new community centre will be provided. The project has come forward for development very recently and, accordingly, the site cannot be considered as available and cannot host a new waste facility.

<p><b>Church Street Site C</b></p>	<p>The Tollgate Gardens Estate site only partially complies with the criteria set out at stage 2 (see map 3). Accordingly, only part of the site can be considered as potential land. The area is currently under development as planning permission was granted in November 2013 for the regeneration of the whole estate. New terraces will accommodate new homes and a new community centre will be provided. The project has come forward for development very recently and, accordingly, the site cannot be considered as available and cannot host a new waste facility.</p>
<p><b>Ebury Bridge Estate</b></p>	<p>The Ebury Bridge Estate site only partially complies with the criteria set out at stage 2 (see map 3). Accordingly, only part of the site can be considered as potential land. The area is currently built and is home to tens of residents that occupy council owned homes. The estate also accommodates a children’s playground and a multi-use games area. The whole area is affected by the Ebury Bridge Renewal project that will provide the area with new homes, new retail floor space and new public spaces. Although the area has not been developed yet, the project will very likely come forward for development over the Plan period. Accordingly, the site cannot be considered as available and cannot host a new waste facility.</p>

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