

London Borough of Hammersmith and Fulham
Draft Local Plan

Background paper: Waste

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1. INTRODUCTION AND SUMMARY

This document summarises the current position with regard to waste collection and disposal in Hammersmith and Fulham, and provides background evidence to support the approach to waste management set out in the council's draft Hammersmith and Fulham Local Plan 2015. In particular, it addresses the recently released National Planning Policy for Waste (and associated guidance), the London Plan 2011 and draft Further Alterations to the London Plan 2014 , including waste apportionments.

The document also demonstrates how Council is fulfilling its Duty to Co-operate obligations in relation to waste planning.

Demonstration of how the proposed waste policies within the emerging Hammersmith and Fulham Local Plan support relevant national policy requirements is provided through the evidence presented in this background report. This includes demonstration the waste planning policies have been developed using a proportionate evidence base, have identified sufficient opportunity to meet identified waste management needs; have identified suitable sites and areas for waste management facilities and included reference to the determination of waste planning applications.

2. NATIONAL POLICY CONTEXT

At the national level, the Waste Management Plan for England provides the high level expression of how the Government intends to work towards a more sustainable and efficient approach to resource use and management. This plan provides an analysis of the current waste management situation in England, and evaluates how it will support implementation of the objectives and provisions of the revised European Union Waste Framework Directive (2008/98/EC).

Detailed waste planning policies for England are set out in the National Planning Policy for Waste (October 2014) which replaced the former PPS 10: Planning for Sustainable Waste Management. It provides the planning framework to enable local authorities to put forward, through local waste management plans, strategies that identify sites and areas suitable for new or enhanced facilities to meet the waste management needs of their areas. Implementation of the National Policy for Waste is supported through Waste Planning Practice Guidance which provides further detailed guidance about implementing national waste policy through local plans relating to waste and the assessment of planning applications.

The National Planning Policy for Waste requires that positive planning support national waste management ambitions through:

- Driving waste management up the hierarchy of waste management;
- Ensuring waste management is considered alongside other spatial planning concerns, such as housing and transport, recognising the contribution waste management can make to the development of sustainable communities;
- Providing a framework for communities and business to be engaged with and take more responsibility for their own waste to be managed in line with the proximity principle;
- Helping to ensure waste management does not harm human health or the environment;
- Ensuring the design and layout of new development and infrastructure complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste

3. REGIONAL POLICY CONTEXT

The London Plan is the strategic planning document for London setting out an integrated social, economic and environmental framework for the future development of London. It provides the regional planning framework for Greater London and includes policy positions on waste which are required to be implemented by London boroughs. Waste planning policies in Hammersmith and Fulham are required to be in general conformity with those policies in the London Plan.

The current London Plan was released in 2011, however draft Further Alterations to the London Plan (FALP) were released for consultation in January 2014 and underwent Examination in Public in September 2014. The FALP includes proposed amendments to waste policy. As such, both the London Plan 2011 and draft FALP 2014 have been considered in the formulation of the Borough's waste planning policies. Council have taken this position, given the advanced stage of preparation of the FALP 2014, and given the apportionment methodology in the FALP was generally found to be sound in the Planning Inspectorates' report published in December 2014.

The London Plan establishes policies which require relevant bodies to work collaboratively to manage as much of London's waste within London as practicable, working towards managing the equivalent of 100 per cent of London's waste within London by 2031 (the draft FALP proposes to bring this target forward to 2026).

The London Plan sets out the spatial policies to support the Mayor's municipal and business waste strategies. The Plan includes projections of municipal and commercial/industrial waste production (broken down per borough). These projections for Hammersmith and Fulham are included in Table 1 which illustrates that the revised waste projection figures contained within the draft FALP are significantly lower than those contained within the London Plan 2011 and suggest waste arising in the Borough will remain broadly similar over the life of the plan (despite the increases in housing and employment planned for over the same period).

Table 1: London Plan 2011 and draft FALP 2014 waste projections (thousands of tonnes/annum): Hammersmith and Fulham

Plan	2011		2016		2021		2026		2031		2036	
	MS W	C&I	MS W	C&I	MS W	C&I	MS W	C&I	MS W	C&I	MS W	C&I
London Plan 2011	91	184	95	186	99	189	103	195	107	204	N/A	N/A
Draft FALP 2014	N/A	N/A	58	117	59	117	59	117	60	118	61	119

The London Plan requires local plans to plan for the provision of sufficient land and waste management facilities required to manage the tonnages of waste apportioned to each individual borough. The waste apportionments allocated to Hammersmith and Fulham up to 2031 (London Plan 2011) and 2036 (draft FALP 2014) are included at tables 2 and 3. The total ultimate apportionment allocated is 348,000 tonnes in the London Plan 2011, with this reduced to 247,000 tonnes in the draft FALP.

Table 2: London Plan 2011 – Hammersmith and Fulham waste apportionment

Year	Municipal solid waste	Commercial and industrial waste	Total
2011	78,000	139,000	216,000
2016	95,000	152,000	246,000
2021	113,000	165,000	278,000
2026	132,000	180,000	312,000
2031	152,000	196,000	348,000

Table 3: Draft FALP 2014 – Hammersmith and Fulham waste apportionment

Year	Municipal solid waste	Commercial and industrial waste	Total
2016	69,000	103,000	172,000
2021	81,000	117,000	198,000
2026	100,000	138,000	238,000
2031	103,000	139,000	242,000
2036	106,000	141,000	247,000

Both the current London Plan 2011 and the draft FALP require borough's (in accordance with London Plan policy 5.17: Waste Capacity) to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the London Plan (noting that Borough's may collaborate and pool their apportionment requirement).

Policy 5.17G states that LDF's should bring forward land to manage borough waste apportionments through:

- protecting and facilitating the maximum use of existing waste sites particularly waste transfer facilities and landfill sites;
- identifying sites in strategic industrial locations;
- identifying sites in locally significant employment areas;
- safeguarding wharves with existing or future potential for waste management

4. HOW WASTE IS MANAGED IN HAMMERSMITH AND FULHAM

Hammersmith and Fulham is a member of the Western Riverside Waste Authority (WRWA) along with the boroughs of Lambeth, Wandsworth and Kensington and Chelsea. As set out in the *Environment Protection Act 1990*, the Boroughs are waste collection authorities and the WRWA is a waste disposal authority. Councillors from each of the member Boroughs jointly govern the WRWA.

The WRWA and its constituent authorities operate in accordance with the WRWA's adopted Waste Policy (July 2013). This document sets out their agreed waste policy and defines the parameters within which waste will be managed within the Authorities' area in a manner that will contribute to the following aims:

- embrace the concepts of waste prevention;
- seek to achieve a continued reduction in the amount of waste produced;
- increase the amount of waste that is re-used;
- recycle, compost or recover energy from the waste that is collected;
- minimise the environmental impact of transporting the waste;
- encourage the creation of new, meaningful, job opportunities;
- minimise disruption to others; and
- reduce costs of operations to provide the best possible deal for Council Tax payers.

The Borough actively participates in regular engagement with other member authorities of the WRWA. This includes regular planning policy meetings; sharing of evidence base and other relevant data; and the coordination of representations made to other waste planning authorities.

4.1 Local Authority Collected Municipal Waste

Hammersmith and Fulham waste collection authority collected 73,518 tonnes of municipal waste in 2013/14. This consisted of household waste and any commercial waste that the council collects under contract. It is notable that in 2013-14, Hammersmith and Fulham collected the eighth lowest amount of household waste generated per person in England, with 291.67 kilograms per head of population. This compares with an average of 333 kilograms for the WRWA area and 358 kilograms for London as a whole.

Waste generated by commercial and industrial uses is generally collected by private waste operators or the council under contract arrangements. In 2013/14 LBHF collected 20,919 tonnes of non-household waste. Commercial and industrial waste collected under contract by the council is managed as part of the local authority collected municipal waste stream. There is no comprehensive information about which companies collect the rest of the commercial and industrial waste or the final treatment or destination of this waste.

Although the total amount of local authority collected waste has fallen from 79,407 tonnes in 2009-10 to 73,158 in 2013-14 the council's percentage of household waste sent for reuse, recycling or composting has also fallen. In 2013/14, 20.53% was sent for re-use, recycling or composting compared to 30.1% in 2011-12 and 23% in 2012-13. It is considered that this reduction in domestic recycling performance is largely based on the behaviour of individual households and can therefore be difficult to understand and predict. However, some of this reduction can be attributed to broader

packaging and consumer trends, such as increased use of lighter-weight materials, or the reductions in newspaper circulation. It is also possible that waste authorities are having difficulty in communicating waste and recycling messages to transient populations and that changes to materials accepted as recycling (such as street sweepings) have also contributed.

The figures and trends suggest that it will prove difficult to achieve the London Plan 2011's targets for at least 45% cent of waste to be recycled/composted by 2015. The RTAB¹ Annual Monitoring Report 2014 highlights that this trend is being experienced in a varied manner across London, with the overall recycling/composting performance featuring declines in the WRWA, East London Waste Authority, Greenwich and Sutton being offset by sharp rises in other areas such as Southwark and the City of London. Table 4 highlights some key waste collection figures for the Borough, taken from the Environment Agency's November 2014 reporting.

**Table 4: Key waste measures–
London Borough of Hammersmith and Fulham Waste Collection Authority**

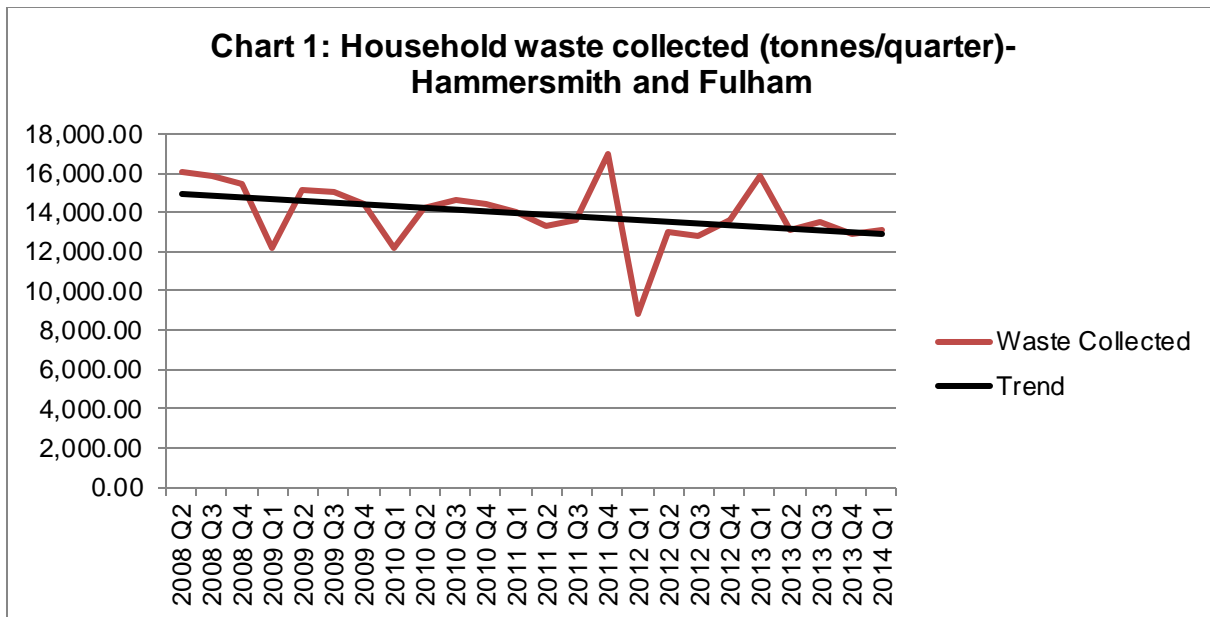
Residual household waste per household (kg/household) (Ex NI191)	497.71 kg/household
Percentage of household waste sent for reuse, recycling or composting (Ex NI192)	20.53%
Collected household waste per person (kg) (Ex BVPI 84a)	291.67
Volume of green waste collected for composting (2013-14) (eg. parks waste/trees)	180.1 tonnes

Source: Environment Authority, ENV18 - Local authority collected waste: annual results tables April 2013-March 2014 /Council internal statistics 2013.14

Waste collected by council is managed for disposal by the WRWA along with waste collected from Kensington and Chelsea, Wandsworth and Lambeth. In recent years the total amount of waste collected by the WRWA as a whole has reduced substantially. For example in 2006-07 the four WRWA authorities collected approximately 485,000 tonnes of waste. In 2013-14 this was reduced to 397,000 tonnes. The WRWA suggests that this reduction has been bought about by a number of factors, including reduced economic activity as a result of the recession; use of lighter weight packaging materials; and a higher public awareness on waste and environmental matters more generally.

As with the broader WRWA area, the Council's overall volume of waste collected has also declined in recent years despite increases in population. (see Chart 1: Household waste collected (tonnes/quarter) – Hammersmith and Fulham). Notwithstanding, continued declines in overall waste tonnages collected by LBHF are not anticipated to continue in light of the high levels of regeneration and population growth planned for the borough over the life of the emerging plan (however the per person rate may continue to decrease).

¹ The London Regional Technical Advisory Board (RTAB) is now known as the London Waste Planning Forum.



Source: WasteDataFlow.org

A thirty year waste management services agreement is in place between WRWA and Cory Environmental Ltd to dispose of WRWA waste, commencing in October 2002 and ending in 2032. Under this contract waste collected by the council, together with the other three borough's in the WRWA area is processed at the WRWA's riverside processing site (Smuggler's Way), close to Wandsworth Bridge within the London Borough of Wandsworth.

Residual waste is transported to an Energy from Waste (EfW) incineration facility at Belvedere within the London Borough of Bexley which was opened in 2012. This facility can handle 670,000 tonnes of waste per year and export up to 66MW of electricity to the National Grid. WRWA supply around 300,000 tonnes of residual waste to the EfW Facility each year, with the waste being transported from Smuggler's Wharf via the River Thames using a specialised fleet of containers, barges and tugs. WRWA estimate the transport of waste by river removes the need for around 100,000 heavy goods vehicle journeys each year.

Under its contractual arrangements, WRWA has a guaranteed right to capacity at the EfW Facility but it does not guarantee to supply any minimum tonnage level or make any minimum payment. Consequently the council has a financial incentive to reduce, reuse or recycle as much waste as possible as the contract does not penalise Council for delivering a reduced amount of waste.

The principal residue from the EfW incineration process is Incinerator Bottom Ash, which amounts to approximately 28 per cent by weight of all the waste processed through the Belvedere facility. This equates to approximately 180,000 tonnes of bottom ash, including metals, being produced each year. This by-product is transported by river to a purpose-built processing facility at Tilbury docks, operated by Ballast Phoenix, where metals are recovered for recycling and the ash is processed into various grades of aggregate. Less than 2% of the WRWA waste now goes to landfill being the light fly ash material produced during the EfW combustion process.

The hazardous air pollution control residues from the Belvedere facility are stored underground within disused chambers of the Winsford Rock Salt Mine in Cheshire (within the administrative boundary of Cheshire West and Chester Council), in the 'Minosus' facility operated by Veolia Environmental Services.

4.1 Waste imports to Hammersmith and Fulham

The Environment Agency's Waste Data Interrogator 2013 (WDI 2013) has been used to identify waste imports and exports from LBHF². The waste interrogator is a database tool which enables local authorities and other bodies to share data gathered by the Environment Agency on waste activities at permitted waste management sites.

The WDI 2013 data reveals that 529,000 tonnes of waste was imported to Hammersmith and Fulham in 2013. This was primarily handled by , the Powerday Waste Recycling and Recovery Centre and Mayer Parry Recycling Ltd/European Metals Recycling (EMR) operations, two waste sites of metropolitan significance, at Old Oak in the north of the borough. The data recorded in the WDI 2013 system does not allow the origins of this waste to be sourced back to individual waste planning authorities – only to broader regions. The Powerday site was recorded as receiving approximately 360,000 tonnes of waste, with 264,000 tonnes being from within Greater London, and 95,000 tonnes being estimated to be sourced from South East England. Waste received at the EMR site was recorded as being from a non codeable source (meaning it could have come from within or outside of Greater London). Further detail of waste imports and recorded regional origins is outlined in Table 4.

The data within Table 4 reveals the significance of the large waste sites in Hammersmith and Fulham for the management of both household/industrial and commercial waste and construction and demolition waste for Greater London and other areas. These sites receive significant tonnages of waste from a broad area, and the nature of waste data reporting by the Environment Agency means that when waste is treated/processed at these sites and exported elsewhere it is recorded as being a waste export from Hammersmith and Fulham. However, in reality the waste could have come from anywhere in Greater London or beyond and is consequently been managed (as opposed to produced) within Hammersmith and Fulham.

Table 4 - Waste imported to Hammersmith and Fulham (over 1 tonne) (WDI 2013)

Waste Site Operator	Waste Category	Origin Waste Planning Authority (WPA)	Origin Region	Tonnes Received
Powerday PLC	Inert/Construction and Demolition	WPA not codeable (London)	London	140,410
Powerday PLC	Household/Industrial/Commercial	WPA not codeable (London)	London	123,968
Powerday PLC	Household/Industrial/Commercial	WPA Not codeable (South East)	South East (Est'd)	95,123

² It is noted that there are some limitations to the Environment Agency data, particularly in relation to the significant proportion of waste sources being listed as Greater London by waste site operators, this does not allow the source of waste to be related to a particular waste planning authority (the Environment Agency has advised that this is currently around 22% of waste reported as being sourced from London cannot be attributed back to an individual waste authority). Nevertheless this is best source of information currently available.

Waste Site Operator	Waste Category	Origin Waste Planning Authority (WPA)	Origin Region	Tonnes Received
Powerday P L C	Hazardous	WPA not codeable (London)	London	141
United Kingdom Tyre Exporters Ltd	Inert/Construction and Demolition	WPA not codeable (South London)	London	46,405
Mayer Parry Recycling Ltd (EMR)	Household/Industrial/Commercial	WPA Not codeable	Not Codeable	122,214
Mayer Parry Recycling Ltd (EMR)	Hazardous	WPA Not codeable	Not Codeable	988

Source: Environment Agency, Waste Data Interrogator, 2013

4.2 Waste exports from Hammersmith and Fulham

Overall, the WDI 2013 data reveals that approximately 501,000 tonnes of waste was exported from Hammersmith and Fulham to other Waste Planning Authorities. This figure includes all waste types (municipal, commercial/industrial and construction/demolition) (including local authority collected waste) and waste movements where the receiving destination is unknown (recorded as non-codeable in information provided to the Environment Agency).

For waste movements where a receiving waste planning authority is recorded, Table 5 provides details of waste exported to landfill. Table 6 provides details of waste exported for use on or in land.³

The WDI 2013 data reveals waste from Hammersmith and Fulham was distributed to a range of waste facilities both in and outside of London. For example, 5.86 tonnes of Household/Industrial/Commercial waste was exported to landfill in Buckinghamshire County Council (Gerrards Cross Landfill), 10.48 tonnes was exported to landfill in Surrey County Council (Redhill Landfill (North East Quadrant)) and 192.72 tonnes was exported to landfill in Wiltshire Council (Pound Bottom landfill). In addition 2423 tonnes of waste (likely excavation stones/soils) was exported for use in restoration/filling works at Hithermoor Quarry in Surrey County Council and 150 tonnes was exported to Horsham Golf Park in West Sussex.

In addition to the waste identified in tables 5 and 6, there are significant tonnages of waste exported to transfer sites, metal recycling sites and treatment facilities (such as a waste electronics treatment facility). These sites are not recorded below as these sites/waste planning authorities are generally

³ Use of waste on or in land, refers to the use of waste (typically excavation waste) for purposes such as landscaping, flood mitigation, or site remediation (for example disused quarries).

not the final export destination of the waste and the inclusion of transfer facilities can result in significant double counting of waste through the Waste Data Interrogator.

Table 5 - Waste exported to landfill from Hammersmith and Fulham (2013 Waste Data Interrogator)

Receiving Authority	Waste Site Name	Operator	Basic Waste Category	Tonnes exported
Buckinghamshire County Council	Park Lodge Landfill Site	Brett Aggregates Limited	Inert/construction and demolition	35459
Buckinghamshire County Council	Gerrards Cross Landfill Site	Veolia ES Landfill Limited	Household/Industrial/Commercial (5.86 tonnes) and Inert/construction and demolition (12.9 tonnes)	18.76
Dorset County Council	Hengrove Farm Landfill	Henry Streeter (Sand & Ballast) Ltd	Inert/construction and demolition	2112
Essex County Council	Pitsea Landfill	Veolia ES Landfill Limited	Inert/construction and demolition	5249.38
London Borough of Havering	Rainham Landfill	Veolia ES Landfill Limited	Inert/construction and demolition	5361.34
Hertfordshire County Council	Westmill II Waste Management Facility	Biffa Waste Services Ltd	Inert/construction and demolition	446.76
Hertfordshire County Council	Great Westwood Landfill	Cemex U K Materials Ltd	Inert/construction and demolition	3247
London Borough of Hillingdon	Sipson North East Inert Landfill	Henry Streeter (Sand & Ballast) Ltd	Inert/construction and demolition	2448
Milton Keynes Council	Bletchley Landfill Site	FCC Waste Services (UK) Limited	Inert/construction and demolition	43.6
Slough Borough Council	Horton Brook Quarry	Jayflex (Aggregates) Ltd	Inert/construction and demolition	270
Surrey County Council	Redhill Landfill (North East Quadrant)	Biffa Waste Services Ltd	Household/Industrial/Commercial (10.48 tonnes) and Inert/construction and demolition (1789.14 tonnes)	1799.62
Thurrock Council	East Tilbury Quarry	S Walsh And Son Limited	Inert/construction and demolition	11243.266
Wiltshire Council	Pound Bottom Landfill Site	Cleansing Service Group Limited	Household/Industrial/Commercial	192.72

Source: Environment Agency, Waste Data Interrogator, 2013

Table 6 - Waste exported and used on or in land from Hammersmith and Fulham (2013 Waste Data Interrogator)

Receiving Authority	Waste Site Name	Operator	Basic Waste Category	Tonnes exported
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Receiving Authority	Waste Site Name	Operator	Basic Waste Category	Tonnes exported
Surrey County Council	Hithermoor Quarry	Brett Aggregates Limited	Inert/construction and demolition (Deposit of waste to land as a recovery operation)	2423
West Sussex County Council	Horsham Golf Park	Pepperacre Limited	Inert/construction and demolition (Deposit of waste to land as a recovery operation)	150

Source: Environment Agency, Waste Data Interrogator, 2013

4.3 Hazardous waste

Certain types of waste can be harmful to human health and the environment and require specialist management. Examples of hazardous waste include:

- asbestos
- chemicals
- batteries
- solvents
- pesticides
- oils
- equipment containing ozone depleting substances
- hazardous waste containers

The Environment Agency's Hazardous Waste Data Interrogator 2013 (HWDI 2013) has been used to identify hazardous waste exports from LBHF.

As with non-hazardous waste data, waste recorded as being exported for treatment or transfer has been excluded as these sites/waste planning authorities are generally not the final destination of the waste.

In addition, export volumes of less than one tonne over the course of the year have been excluded. Total hazardous waste exports of less than one tonne accounted for less than 0.4% of all hazardous waste exports (by volume) recorded from Hammersmith and Fulham and are considered unlikely to constitute a significant impact in terms of volume, vehicle movements or waste facility capacity and are of less relevance in the context of a borough waste planning exercise.

Hazardous waste arisings from Hammersmith and Fulham were primarily made up of insulation materials (potentially containing asbestos), clinical/health care waste, and soil/dredging spoil. Table 7 details the receiving authorities, tonnages and fate of these wastes. Given hazardous wastes can often require more specialist treatment and management, they often draw smaller volumes from a larger market area, meaning it can sometimes be necessary to be managed some distance from its source to ensure it is appropriately and safely managed.

Table 7 – Hazardous waste exported for incineration or landfill from Hammersmith and Fulham

Receiving Authority	Waste Type	Waste Fate	Tonnes exported
Royal Borough of Greenwich	waste engine, gear and lubricating oils	Incineration with energy recovery	19.95
North Yorkshire County Council	waste from natal care, diagnosis, treatment or prevention of disease in humans	Incineration with energy recovery	2.26

Receiving Authority	Waste Type	Waste Fate	Tonnes exported
London Borough of Hillingdon	waste from natal care, diagnosis, treatment or prevention of disease in humans	Incineration without energy recovery	9.47
Royal Borough of Greenwich	absorbents, filter materials, wiping cloths and protective clothing	Incineration without energy recovery	1.78
Surrey County Council	soil and dredging spoil	Landfill	633.5
Kent County Council	insulation materials	Landfill	161.87
Peterborough City Council	soil and dredging spoil	Landfill	80.72
Surrey County Council	insulation materials	Landfill	68.7
Wiltshire Council	insulation materials	Landfill	20.43
Oxfordshire County Council	insulation materials	Landfill	10.82
Northamptonshire County Council	concrete, bricks, tiles, ceramics and gypsum based materials	Landfill	9.14
Bury Council	insulation materials	Landfill	3.54

Source: Environment Agency, Hazardous Waste Data Interrogator, 2013

4.4 Other waste streams

Hammersmith and Fulham Council provides a limited household collection service for clinical or incontinence waste. This service does not extend to businesses or health facilities whose waste is the responsibility of the customer via contracts with authorised and legally approved waste disposal contractors.

The council also offer residents a bulky waste collection service. The Council encourages the reuse of white goods and furniture via the London Re-use collection scheme which runs alongside the Council's bulky waste collection service. In 2013-14 Council collected 78 tonnes of bulky waste and waste electronic equipment which was either sent for re-use or recycled in accordance with the waste management hierarchy.

In addition to those waste streams detailed above in Section 5, the National Planning Practice Guidance on Waste suggests that waste planning authorities should plan for the sustainable management of some other types of waste including low-level radioactive waste, agricultural waste and waste water.

Low level waste (LLW) is radioactive waste having a low radioactive content. Radioactive substances are widely used by hospitals, universities and industry to diagnose and treat patients, in manufacturing processes and to test the safety and quality of pipes, boilers and vessels.

All operators with a permit to dispose of radioactive substances are recorded on the Environment Agency's Home of Public Registers. A search for the Hammersmith and Fulham Borough reveals 91 permit holders. The majority of these uses are health care, hospitals and medical research organisations. These operators are required to make arrangements for the management and disposal of radioactive substances in accordance with Environmental Permitting (England and Wales) Regulations SI 2010. Given this requirement the Borough' waste planning policies do not include specific policies on the management of low-level radioactive waste.

There are no agricultural uses in the borough and agricultural waste is considered to be a negligible issue in the borough.

Waste water is managed by Thames Water. The Local Plan includes policies to ensure that waste water is managed in an appropriate manner. In consultation with Thames Water, developers are required to demonstrate that there is adequate capacity in the sewer system both on and off site to serve proposed development. The Local Plan also includes provision to encourage the reduced production of waste water (refer proposed Borough-wide Policy CC3: Reducing Water Use and the Risk of Flooding).

5. CURRENT WASTE MANAGEMENT CAPACITY IN HAMMERSMITH AND FULHAM

Analysis of the Environment Agency's Waste Data Interrogator has identified four waste sites in the borough which are outlined in table 8. Two of these sites are recorded as handling both household/commercial and industrial waste.

Table 8: Waste operations – Hammersmith and Fulham

Site Operator	Permit type	Location	Total tonnes of waste received (WDI 2013)	Household/ Commercial Industrial Waste received (WDI 2013)	Permitted capacity
Powerday PLC (Old Oak Sidings site)	A15 : Material Recycling Treatment Facility	Easting 521740 Northing 182658	359,643 tonnes	219,000 tonnes	1,600,000 tonnes
Mayer Parry Recycling Ltd (EMR)	A20 : Metal Recycling Site (mixed MRS's)	Easting 522520 Northing 182345	123,203 tonnes	122,214 tonnes	419,000 tonnes
United Kingdom Tyre Exporters Ltd	A11 : Household, Commercial & Industrial Waste Transfer Station	Easting 522496 Northing 182329	46,405 tonnes	Nil	244,305 tonnes
Reg Orpin Motorcycles	A19 : Metal Recycling Site (Vehicle Dismantle)	Easting 522843 Northing 179520	3 tonnes	Nil	5 tonnes

The north of the borough is home to two strategically important waste management sites, located in the Hythe Road area. The Old Oak Sidings (Powerday) site is approximately 3.5 hectares and was opened in 2006 under a wide ranging licence to manage up to 1.6 million tonnes of waste per annum. The site manages both municipal waste/commercial/industrial waste and construction/demolition waste. In 2013, the site received 219,000 tonnes of household/commercial/industrial waste out of a total of 359,643 tonnes of waste received. This represented approximately 60% of waste received at the site.

Based on this proportion and the licence for 1.6 million tonnes, it is estimated that the site has the capacity to manage a maximum of 960,000 tonnes of household and commercial and industrial waste (subject to market variation and realising the potential of rail and canal for waste transport). The council considers that whilst current tonnages may be significantly lower than this maximum figure, there is sufficient capacity available at this site to meet both the current London Plan and draft FALP waste apportionments (being 348,000 and 242,000 tonnes per annum respectively). Given this capacity, the council will continue to safeguard the use of the site for waste management purposes in the emerging Local Plan.

The Mayer Parry Recycling (EMR) site is approximately 3.3 hectares and received 122,000 tonnes of household/commercial/industrial waste in 2013. This site has been in long standing use for metals reclamation, primarily scrap cars and whitegoods which are classed as an industrial waste stream. It is understood the site has capacity to process up to 370,000 tonnes of scrap metal per annum and is licenced to receive up to 419,000 tonnes of waste. While it is likely the site will remain in waste use for the short to medium term, it is not proposed to count this capacity towards the borough's waste apportionment as Council's policy position for the Old Oak Regeneration area is that the EMR site is critical to the comprehensive regeneration of the strategic site.

The two other sites receive smaller amounts of construction and demolition waste which is not part of the apportionment exercise. The suitability of other locations in the borough for waste management facilities has been considered as part of the local plan process, however no suitable locations have been identified. The borough is in inner London where few industrial areas remain for the location of future substantial waste management facilities (particularly given the planned regeneration of Old Oak and White City areas). The Further Alterations to the London Plan do not identify any strategic industrial locations in the borough and remaining employment areas are designated for mixed use (for example as opportunity areas in the London Plan and as Regeneration Areas in the Local Plan). The Local Plan will seek to ensure the development of these areas contributes to good waste management and recycling practice through the provision of appropriate on-site waste management.

Although there are currently three wharves in the borough which are safeguarded in the London Plan for the transport of freight by river, none of these wharves are currently being used for waste shipment, and they are considered unsuitable for this purpose given poor road access and proximity to residential uses. It should be noted that Hurlingham Wharf is being used for the construction of the Thames Tideway Tunnel and will not be available for approximately 10 years and that Comleys and Swedish wharves are both in use and also subject to a planning application for mixed use, including concrete batching and residential. The significant WRWA Smugglers Way waste management and transfer facilities are located immediately across the river in Wandsworth. The Council's policy position is to maximise the use of this facility for the management of municipal waste (given the significant investment undertaken at the site by the WRWA).

6. PROPOSED LOCAL PLAN POLICY APPROACH

The council's spatial planning policy in relation to strategic waste management is outlined in Borough-wide Policy CC5: Strategic Waste Management. This policy states that the council will pursue sustainable waste management, including planning to manage the waste apportionments set out in the London Plan. These borough wide policies are proposed to be achieved through the following:

Table 9: Local plan waste policy approach

Policy	Implementation
<ul style="list-style-type: none"> Planning to manage 348,000 tonnes per annum of waste in H&F by 2031 (or 242,000 tonnes if the revised figure in the Further Alterations to the London Plan are approved); 	<ul style="list-style-type: none"> Continue to safeguard the Old Oak Sidings (Powerday) waste site for waste management activities to ensure the Council meets its waste apportionment targets. It is acknowledged that this position is likely to have to be reviewed subject to the position taken by the Greater London Authority in relation to waste apportionment in any possible Mayoral Development Corporation being established at Old Oak and in the longer term, in relation to the progress of regeneration of the Old Oak

	<p>site.</p> <ul style="list-style-type: none"> - To meet longer term waste apportionment figures, investigate alternative approaches to meeting waste apportionment and allowing longer term redevelopment of the Old Oak Sidings. This could include business relocation and pooling waste apportionment requirements with other London boroughs. - - Conditioning major developments to sort, process and recover materials on site, increasing capacity to manage waste in the Borough.
<ul style="list-style-type: none"> • Promoting sustainable waste behaviour and maximum use of the WRWA Smuggler's Way facility; 	<ul style="list-style-type: none"> - Ensure provision is in place to require major new developments to make provision for sorting and managing waste and recyclables on site. - Implementing proposed Borough wide Policy CC6 which requires developments to include suitable facilities for the management of waste generated by the development, including the collection and storage of separated waste and where feasible on-site energy recovery. - Continued provision of Council's bulky goods and clinical waste collection services
<ul style="list-style-type: none"> • Seeking, where possible, the movement of waste and recyclable materials by sustainable means of transport, including the Grand Union Canal. 	<ul style="list-style-type: none"> - Maintain conditions which require a maximum of 1/3 of the licenced capacity of the Powerday waste facility to be transported by road (maximising use of site's rail and canal access). - Proposed Borough wide policy RTC5 encourages the use of the canal for appropriate freight movement (for example construction and waste materials for HS2 and leisure passenger boats).

7. DUTY TO CO-OPERATE

The Localism Act 2011 introduced the 'Duty to Co-operate' requiring local planning authorities (and other public bodies) to co-operate in relation to the planning of sustainable development. All public bodies have a duty to co-operate on planning issues that have cross administrative boundary impacts, particularly those relating to the strategic priorities set out in the NPPF, such as the provision of infrastructure for waste management and wastewater. In carrying out their duty, the Act expects bodies to "engage constructively, actively and on an ongoing basis". In the case of Hammersmith and Fulham there are several cross boundary movements of waste which need to be considered.

National Planning Practice Guidance provides further advice as to how the Duty to Co-operate is required to be applied to waste planning issues. The guidance notes the strategic nature of waste planning issues which can be addressed through close co-operation between waste planning authorities and other local planning authorities and public bodies to ensure a suitable and sustainable network of waste management facilities is in place. The guidance states that effectively meeting this duty *could* include joint gathering and evaluation of waste data, engaging actively in dialogue on waste matters that will impact most on neighbouring authorities and more widely when dealing with waste streams where there is a need for relatively few facilities (i.e. certain types of low volume hazardous wastes which require specialist management). It is also suggested this could include jointly monitoring waste arisings and capacity. The guidance goes on to state that the duty to co-operate will be particularly important where waste planning authorities are unable to identify sufficient, suitable, opportunities for waste management facilities.

LBHF is a member of the Western Riverside Waste Authority (WRWA). It is managed by a Committee made up of two elected Councillors from each of these four borough councils and Council officers actively participate in regular engagement with other member authorities of the WRWA. This includes regular planning policy meetings; sharing of evidence base and other relevant data; and the coordination of representations made to other waste planning authorities. Where practical and appropriate representations on waste planning issues are made on behalf of the WRWA as a whole, particularly in regard to representations to the Mayor of London and other Waste Planning Authorities and engagement around satisfying London Plan waste apportionment targets. While it is possible for the constituent councils of the WRWA to develop a jointly prepared waste plan, councils within the area have elected to deal with waste planning matters through their respective local plans while working closely with WRWA authorities and other significantly affected parties (such as waste collection authorities which receive waste from LBHF). Close working relationships are maintained through the ensuring that affected local planning authorities are written to regarding all potentially relevant planning consultation, briefings through the regular WRWA planning officer meetings, and through active involvement in the London Waste Planning Forum (formerly London RTAB).

Council's membership of the Waste Planning Forum provides a mechanism to liaise with other London waste planning authorities, the Greater London Authority (GLA), the Environment Agency, and other regional Technical Advisory Boards on waste planning matters. The council also works with the London Waste and Recycling Board (LWARB), a statutory board whose members are appointed by the Mayor of London and London Councils established by the GLA Act 2007. Participation provides opportunities to work strategically with the GLA and other boroughs on waste matters including opportunities for gaining funding for waste management projects.

As part of the development of the Local Plan, letters will be sent to all authorities to which LBHF exports a significant quantity of waste for disposal in landfill or on or in land (identified using the Environment Agency Waste Data Interrogator and Hazardous Waste Data Interrogator 2013). The waste planning authorities will be invited to comment on information on waste exports and will have the opportunity to comment on the accuracy and significance of these recordings. The correspondence will provide a foundation for ongoing engagement with relevant authorities who consider the impact of waste exports from LBHF are of significance. Where required, follow up correspondence and meetings will be arranged to ensure issues raised are duly considered in the finalisation of the waste planning policies. The council will also write to the WRWA and its member local authorities as well as neighbouring local planning authorities. The London Borough of Bexley will be written to, as this is the where WRWA non-recyclable waste is incinerated in the Belvedere EfW facility.

The council recognises that the future development of the Old Oak Common site will potentially have significant impact on the council's ability to meet its London Plan waste apportionments in the longer term. The council will continue to actively engage with the Greater London Authority, any potential Mayoral Development Corporation⁴ for the Old Oak site and the West London Waste Plan authorities (particularly Ealing and Brent) regarding the impacts of this process on waste planning.

⁴ Council notes that the Further Alterations to the London Plan, Inspector's Report November 2014 recommended that amendments (reference IRC4) be made to the London Plan, clarifying that where a Mayoral Development Corporation (MDC) exists or is established within a Borough the MDC will co-operate with the Borough to ensure that the Borough's apportionment requirements are met.

8. REFERENCES/INFORMATION BASELINE

The following references record the primary sources of information that have been used to compile this background paper:

- Department for Environment, Food & Rural Affairs. November 2014. 'ENV18 - Local authority collected waste: annual results tables'. <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables>
- Environment Agency. 2014. Waste Data Interrogator. Accessible via http://www.geostore.com/environment-agency/WebStore?xml=staticweb/xml/dataLayers_WDI.xml
- Environment Agency. 2014. Hazardous Waste Data Interrogator. Accessible via <http://data.gov.uk/dataset/hazardous-waste-interrogator>
- London Waste Monitoring Report 2014. London RTAB Annual Monitoring Report 2014 <https://knowledgehub.local.gov.uk/documents/6784472/0/London+Waste+Monitoring+Report+2014/5a569e5c-8aa9-437b-a422-383e8d88abec>
- Wastedataflow database 2013, available to access at wastedataflow.org
- Western Riverside Waste Authority. 'Waste Policy July 2013'. <http://www.wrwa.gov.uk/media/44808/waste-policy-statement-july-2013.pdf>