

London Borough of Hammersmith and Fulham
Local Development framework

Background paper: Waste

**September 2010
(with amendments January 2011)**

For further information please contact:

Development Plans Team
Planning Division
Environment Services Department
London Borough of Hammersmith and Fulham
Town Hall Extension
King Street
London
W6 9JU

Telephone 020 8753 3044
Email ldf@lbhf.gov.uk
Website www.lbhf.gov.uk

Introduction

1. Background

1.1 The Hammersmith and Fulham Community Strategy 2007-2014 sets out the vision and key priorities for the borough. These include the key objective of creating a cleaner and greener borough. In delivering this objective the council is committed to achieving significant increases in the recycling and re-use of waste and to deal with locally produced waste in a sustainable manner.

1.2 The council with its partner waste disposal boroughs (Kensington and Chelsea, Lambeth and Wandsworth) and the Western Riverside Waste Authority have produced a Joint Municipal Waste Management Strategy and action plan for the six years 2006-2011. This sets out a strategy and action plan on how it is proposed to deal with the disposal of municipal waste within the period. This includes household waste and any commercial and industrial waste that is collected by the constituent councils under contract. The Strategy sets out the following key objectives to be incorporated into the management of locally produced waste:

- embrace the concepts of waste prevention;
- seek to achieve a sustained reduction in the amount of waste arising;
- minimise the use of landfill;
- increase, as far as is practicably possible, the amount of waste that is re-used, recycled and composted;
- recover energy from waste that cannot be recycled or composted;
- maximise the use of sustainable river transport;
- assist in achieving regional self-sufficiency for the London area;
- minimise disruption to others and implement a “good neighbour” approach to the management of waste facilities; and
- represent all round Best Value for the local community without excessive cost.

1.3 The four constituent boroughs of the Western Riverside Waste Authority considered the production of a joint waste DPD, but decided that these matters could be dealt with adequately through individual borough DPDs, as part of the Core Strategy and other Documents. More recently we have been approached by the Royal Borough of Kensington and Chelsea and City of Westminster to assist them in meeting their apportionment which is set by the GLA in the London Plan. They have indicated that they would have a shortfall of sites and are unable to meet the apportionment set out in the London Plan. The apportionment figures are subject to review as part of the preparation of the replacement London Plan.

2. Key facts

2.1 Hammersmith and Fulham currently collects about 79,407 tonnes of municipal waste annually (2009/10). This comprises all household waste and a proportion of commercial waste collected under contract. The amount of commercial and industrial waste collected is likely to continue to decline as a

proportion of the total because of the additional waste disposal costs that apply to municipal waste through the Landfill Allowance Trading Scheme (LATS). This scheme has introduced financial penalties on Local Authorities that exceed their allocated allowance to landfill biodegradable municipal waste. The scheme does not apply to waste collected and disposed of by the private sector. Overall the level of waste is expected to increase due to the council's regeneration objectives which will increase the population and the number of households in the borough. The council will however continue to work to minimize the amount of waste generated per household and to increase the re-use, recycling and composting of waste.

2.2 The council's 2009/10 recycling and composting rate was 20.9% for municipal waste and 27.2% for household waste. These rates are higher than for many other London boroughs. Action is being taken to increase this rate. In 2009 the council introduced same day waste and recycling collections. This enables households to put out orange smart sacks with their residual waste. Smart sacks can include paper and card, glass, cans, tins and aerosols, plastic bottles and paper based drinks cartons. Other schemes include improvements to the collection of recycling from non-kerbside households which are a significant obstacle to improving household recycling in inner London boroughs. The council is currently reviewing reuse and organic waste streams. Greater levels of recycling are anticipated in the medium and long term although the London Plan target of in excess of 45% for municipal waste by 2015 is considered optimistic for this borough.

2.3 Residual municipal waste is currently transported downriver via the two Western Riverside Waste Authority (WRWA) transfer stations (both in Wandsworth) to a landfill site, adjacent to the Thames in Thurrock, Essex. This saves substantial lorry movements each year (estimated at 100,000 HGV trips per annum for the whole of the WRWA). When a new incinerator is completed, anticipated to be 2011/12, at Belvedere in the London borough of Bexley (also adjacent to the Thames), all of this council's residual municipal waste will be dealt with within London and will no longer be landfilled.

2.4 Co-mingled dry recyclables collected via the council's kerbside, bring bank and commercial waste recycling services were previously sent by road to the Viridor Waste Management material reclamation facility in Crayford, Kent to be sorted. However, this is being diverted to a new materials reclamation facility in Wandsworth from 2010/11, eliminating the need to transport this material by road for initial sorting. This facility is now complete and will have a capacity of 85,000 tonnes per annum when fully operational.

2.5 There are two WRWA owned Civic Amenity Sites situated within the four WRWA boroughs situated at Smugglers Way in Wandsworth and Cringle Street, Battersea, both of which are operated on the Waste Authority's behalf by Cory Environmental Ltd. Both take a range of household waste free of charge from residents within the four boroughs including a range of recyclables. A third CA site is located at Vale Street in Lambeth. However this is operated under contract by Veolia solely on behalf of Lambeth Council and is not a WRWA site. Additional Civic Amenity sites located elsewhere

within the WRWA area would be desirable, reducing the travel distances for some residents, who at present live the furthest away from the existing WRWA facilities. Hammersmith & Fulham would benefit from having such a site located in the north of the borough.

2.6 There are two large waste management sites situated in the north of the borough in the Hythe Road industrial area. These sites deal primarily with the processing of construction waste and scrap metal, end of life cars and white goods. Both sites are key strategic facilities within this part of London. In addition both are well located to use sustainable means of transport including both rail and canal. There are two other smaller waste handling and storage sites within this area situated off Scrubs Lane.

3. National Policy and Context (PPS10)

3.1 Government policy with regard to waste management is set out in Planning Policy Statement 10 (PPS10) Planning for Sustainable waste management and the associated companion guide. It sets out the new agenda for the management and treatment of waste within planning documents, where it is seen as an integral part of the planning process and regarded as a resource. Waste should be disposed of only as a last resort and the principle of moving waste up the 'waste hierarchy' of reduction, reuse, recycling and composting, and using waste as a source of energy is set out as the principle objective.

3.2 The key objectives of PPS10 can be summarised as

- Deliver sustainable development through driving waste up the waste management hierarchy as discussed above
- Communities should take responsibility for their own waste
- Assist in the implementation of the national waste strategy and our obligations under European legislation
- Secure the recovery and disposal of waste safely and without harm to the environment in a nearby appropriate facility
- Reflect the needs of all interested parties and encourage competitiveness
- Protect green belts but recognise the locational needs of some types of waste management facilities in determining planning applications
- The design and layout of new development should support sustainable waste management

4. Regional Policy (London Plan Consolidated with Alterations since 2004)

4.1 The London Plan provides the regional policy framework with which the Hammersmith and Fulham waste planning policies must be in general conformity.

4.2 The London Plan Consolidated with Alterations since 2004, takes forward PPS10 at the regional level and seeks to provide the framework whereby

communities take responsibility for their own waste. In order to achieve this, policy 4A.21 sets out four key policy objectives/targets:

- To ensure the provision of sufficient facilities to manage 85% of waste arising in London by 2020
- To minimise the level of waste generated
- To increase re-use and recycling and composting of waste and reduce landfill disposal
- To exceed recycling and composting levels of 45% in municipal waste by 2015

4.3 Policy 4A.22 sets out the spatial framework that boroughs' development plan documents should observe:

- Safeguard all existing waste management sites unless appropriate compensatory provision is made;
- Require, wherever feasible, the re-use of surplus waste transfer sites for other waste uses;
- Identify new sites in suitable locations for new facilities;
- Require the provision of suitable waste and recycling storage facilities in all new developments;
- Support appropriate developments for manufacturing related to recycled waste;
- Support treatment facilities to recover value from residual waste;
- Where waste cannot be dealt with locally, promote waste facilities that have good access to rail transport or the Blue Ribbon network;
- Safeguard waste sites, including wharves, with an existing or future potential for waste management and ensure that adjacent development is designed accordingly to minimise the potential for conflicts of use and disturbance;

4.4 Policy 4A.23 sets out the criteria that should be used to select sufficient sites for waste management and disposal within a borough. These include having regard to proximity to the source of waste and the nature and scale of the proposal and its environmental and transport impact. Sites should primarily be located in Preferred Industrial Locations or existing waste management locations.

4.5 Four waste policies in the London Plan provide more detailed policy guidance on the protection and intensification of existing waste sites; the provision of new sites to meet the level of waste apportioned at borough level; provision of a range of facilities; broad locations considered suitable for new facilities. The two existing strategic employment locations of Wood Lane and Park Royal (Hythe Road) located within Hammersmith and Fulham are identified as possible broad locations for recycling and waste treatment facilities (Table 4A.8). New policies provide support for new excavation and demolition waste management sites in London, including on-site facilities and the safeguarding of existing sites. Provision should also be made for necessary provision for hazardous waste treatment plants.

4.6 Table 4A.6 shows the amount of waste to be managed by each London borough. This has been worked out using a complex model developed to allocate waste management responsibility on the basis of the amount of waste arising in an area and the estimated capacity to provide facilities to manage locally produced waste. The table is broken down by Municipal Solid Waste and Commercial and Industrial waste. These represent total figures rather than additional tonnages and follow detailed survey work and discussion regarding the merits or otherwise of the waste apportionment model. This borough had concerns regarding the reliability of the data that was included in the exercise and the lack of adequate sensitivity testing of available land, as well as concerns with the weighting given to actual capacity to provide facilities in the current apportionment.

4.7 The following is an extract from Table 4A.6 for Hammersmith and Fulham. No borough figures are included in the table for construction or for hazardous waste.

	2010			2015			2020		
	MSW	C & I	Total	MSW	C & I	Total	MSW	C & I	Total
Hammersmith and Fulham	71	176	247	116	211	327	135	250	385

(thousand tonnes per annum)

4.8 The GLA published in October 2009 the consultation draft replacement London Plan. A subsequent minor alteration gives revised figures for waste arisings and borough level apportionment. In addition as part of the Examination in Public the GLA have published revised tables for waste arisings and apportionment. The latest figures included in the Early Suggested changes to maps, figures and tables (May 2010) show that this borough would be expected to process 348,000 tonnes in total by 2031. This is a reduction from that previously shown for 2020 and reflects a reduction in the expected waste arisings within London.

Waste Policies

Waste Apportionment

5.1 The GLA's latest estimate of total waste arisings to 2031 by borough estimates that this borough will give rise to 107,000 tonnes of MSW and 204,000 tonnes of C & I waste. (This is a significant reduction from previous figures to 2020) However, it is recognised that it may not be possible for all boroughs to deal with their own waste and that some boroughs may need to "export" waste to the nearest borough where there is capacity to accommodate waste management facilities. To this end, the total amount of waste predicted to arise in London has been apportioned to each borough on the basis of a model developed to identify the appropriate amount of waste that each borough can manage. Therefore, the London Plan requires

boroughs to safeguard all existing waste management sites and sites with future potential for waste management to meet the tonnages apportioned through the borough apportionment exercise. The current apportionment figure (May 2010) for this borough is 348,000 tonnes per annum of combined MSW and C & I by 2031. This figure means that the borough will be a net importer of waste and will be required to deal with additional projected waste arisings from elsewhere in London. The apportionment exercise does not take account of land required for more specialist waste streams like construction and demolition waste and hazardous waste.

5.2 This borough had considerable reservations about the adequacy of the waste apportionment exercise primarily concerning the lack of realism in the model because of the low weighting given to actual capacity within a borough to provide facilities. There was also substantial concern with regard to the lack of adequate sensitivity given to industrial sites within inner London that are often too small for a waste management facility and in an inappropriate location. The resulting model was considered to be disproportionately onerous on central and inner London boroughs, but the GLA has stated that it does not intend to reopen this debate through the examination in public on the consultation draft replacement plan.

Waste management capacity required

5.3 The GLA consultants assumed the figure of 1 hectare for 80,000 tonnes of waste when undertaking the waste apportionment exercise, which equates to about 4.35 hectares of land within this borough. London Plan policies specify that where waste cannot be dealt with locally, suitable provision should be made that makes good use of the blue ribbon network (Policy 4A.22).

5.4 This council together with the other boroughs within the Western Riverside Waste Authority are actively seeking to divert the transshipment of residual municipal waste from the current landfill arrangements, outside London, to a new riverside Energy from Waste incinerator, currently under construction at Belvedere, within the London Borough of Bexley. This facility is programmed to be operational in 2012, at which time all of this borough's residual municipal waste will be dealt with within the region and will no longer be transported outside of London to landfill. No further site provision will be required to deal with this part of the borough's waste, and in line with London Plan policy it will be transported sustainably along the river, thus avoiding unnecessary road based trips.

5.5 The borough's co-mingled dry recycling is currently transported to the Viridor material reclamation facility in Crayford, Kent. However, a new facility now complete at Smugglers Way in the adjoining borough of Wandsworth will mean that this material will be processed within the boundary of one of the WRWA member boroughs and in accordance with the proximity principle when fully commissioned. This facility has the capacity to manage 85,000 tonnes of recyclables per annum. However, if recycling targets are met, further facilities will be required beyond 2011/12 to accommodate the growth

in volume of this waste stream or alternative facilities available in the area utilised.

5.6 Following extensive public consultation separate regular garden waste collections will be stopped in the borough in favour of promoting home composting. This is considered to be the most sustainable option for dealing with this waste stream and will reduce the number of collection lorries that are used. However, some garden waste will be collected alongside ordinary household refuse and there is the facility to arrange for collection by the council for larger volumes of garden waste. These will be transported via Smugglers Way transfer station to be composted outside London. This is a space extensive activity and it is unlikely that suitable sites would exist within the borough boundary and the preference is to encourage home composting.

5.7 As stated above, most of this borough's municipal waste is managed in the adjoining borough of Wandsworth and this arrangement will continue until the current contract ends in 2032. However waste management facilities in the north of the borough mean that the borough has capacity for the management of municipal and commercial and industrial waste (see para. 5.8) and can meet its current waste apportionment targets. The borough also makes significant provision for the management of construction and demolition waste which contributes to the management of its own and London's construction waste and considerable regard should be taken of this factor, especially in view of the substantial area of land that this takes up.

Waste management sites in the borough

5.8 There are currently two strategically important sites in the Hythe Road area where mainly non-municipal waste is managed. The Old Oak Sidings site is 3.9 hectares and was opened in 2006. Powerday currently operates on the site and has a wide ranging licence to deal with up to 1.6 million tonnes per annum when fully operational. The company primarily deal with construction and demolition waste but also a smaller proportion of municipal solid waste and commercial and industrial waste. The site has the benefit of canal access and a rail head and a planning condition restricts vehicle movements to about one third of the annual maximum licensed capacity. This condition may ultimately restrict the ability of the facility to achieve its full potential capacity. Waste can be received from building sites along the canal and recycled material can be transported out via the railhead to destinations across the country. Development of these modes of transporting waste could significantly reduce lorry movements within London and improve the take-up of capacity at this site. The site provides a state of the art strategic waste management facility within Hammersmith and Fulham.

5.9 However, the site deals primarily with construction waste streams which do not fall within the waste apportionment exercise. We have been advised by the GLA that the part of the facility that deals with non-construction waste streams could be counted towards waste apportionment.. The MRF has the capability to recover from black sacks which assists Local Authorities to improve recycling. The company also has contracts with local businesses but

this is not their primary focus. The GLA have informed us that the site has the potential to process up to 200,000 tonnes of MSW and C & I. However, the achievement of this will be dependent on meeting the planning condition that a maximum of one third of the licensed capacity of 1.6million tonnes can be transported by road.

5.10 The EMR site adjoining Hythe Road is 4.4 hectares and has been in long standing use for metals reclamation, primarily scrap cars and fridges. It has recently extended its facilities so that it can accommodate the requirements of European Union legislation for decontamination and receives waste white goods from within Hammersmith and Fulham and elsewhere in the south east. It is one of a number of strategically important sites in London. This site provides for the processing of metals and can be included towards our borough apportionment tonnage. The majority of processed metals are transported out of the site sustainably via a rail head (currently about 70%). Greater use of this mode of transport is envisaged and the site may have the potential for further intensification.

5.11 The above two sites provide important strategic waste management facilities within the London area. They provide primarily specialist waste management facilities EMR processes about 370,000 tonnes of metal per annum which is regarded as an industrial waste stream under a licence that permits up to 419,000 tonnes.

5.12 The combined site area of these two sites is in excess of 7 hectares and together they provide a substantial contribution towards the treatment of London's waste within the region having a total licensed capacity in excess of 2 million tonnes per annum. In terms of meeting our apportionment figure, the sites exceed the latest GLA apportionment of 348,000 tonnes per annum for Hammersmith and Fulham by 2031. The estimated tonnage (excluding construction) that can be processed on these two sites is 570,000 tonnes per annum an excess capacity of up to 222,000 tonnes..

5.13 There are currently two small sites in Scrubs Lane (Appendix1)that mainly store and transfer waste. They may have the potential to extend their current handling and storage waste activities to provide future waste management facilities.

5.14 The borough is in inner London where few industrial areas remain for the location of further substantial waste management facilities. There are currently two strategic industrial locations identified within the London Plan although the Wood Lane IBP is proposed to be deleted in the draft replacement London Plan. The council has supported the deletion of this SIL as part of the process of replacing the London Plan. The remaining employment areas are now mixed in nature or are primarily office areas and are no longer designated in the Hammersmith and Fulham UDP.

5.15 Current large waste management sites (at EMR and Powerday) provide sufficient capacity within the borough in terms of the requirements of the London Plan and will provide excess capacity to assist neighbouring

boroughs. At this stage there is no need to find additional sites other than for managing locally produced waste streams (see below). It is considered that the most appropriate way for any additional capacity to be provided is as part of major development proposals. This could take the form of waste sorting on site and the use of small scale energy from waste schemes, where this is appropriate. Should further significant capacity be required then in accordance with the London Plan development sites within the Strategic Industrial Location including current waste handling and storage sites at Scrubs Lane should be assessed to provide this capability in the first instance.

5.16 Further waste management facilities may be required to deal with locally produced waste streams through to 2031 and beyond and to provide for a greater range of waste processing facilities within the borough, including further capacity for recycling and composting and dealing with food waste. The reworking of waste arisings by the GLA and extending the period to 2031 as part of the development of the replacement London Plan has not given rise to the need for extra capacity within Hammersmith and Fulham. The sites currently in waste management use provide sufficient capacity at the present time.

5.17 There are currently 3 wharves in the borough that are safeguarded in the London Plan for the transshipment of freight, including waste and aggregates and freight related activities. None of these currently are used for waste management. Two are currently occupied, but only one is involved with the transshipment of river borne freight. None of these sites are considered suitable for the management or for the transshipment of waste because of their poor road access and proximity to residential areas. Also there is already a significant investment in river based waste transfer facilities immediately across the river in Wandsworth, at the WRWA facility at Smugglers Wharf.

Sustainable disposal of commercial and industrial waste streams

5.18 The collection of commercial and industrial waste streams can be either through contracts with the council or with private companies. It is anticipated that a declining proportion of municipal waste will be from the commercial sector as greater use is made of private collection companies. The waste companies situated in the north of this borough receive primarily C&I waste streams.

5.19 This council is engaged with the GLA, TFL, LDA and the adjoining boroughs of Ealing and Brent in the production of an Opportunity Area Planning Framework for the Park Royal Opportunity area, part of which falls within the northern part of this borough and is principally industrial in nature. The draft framework, issued by the Mayor of London in February 2008, identifies the potential for a waste management facility to be provided within the boundary of Park Royal, most likely on a site within the adjoining London Borough of Brent to provide a significant part of the waste management processing needs of London's largest industrial area within its area. The development of this project is ongoing.

5.20 Further initiatives are being explored as part of the development of both the White City Opportunity Area and the Earl's Court/West Kensington Opportunity Area.

Appendix One: Waste Sites within LBH&F (January 2011)

Business	Address	Waste Streams	Comment
Powerday	Old Oak Sidings	Construction, MSW and C & I	New State of the Art facility opened in 2006. Has extensive waste processing facilities. Utilises rail and canal
EMR	Scrubs lane	C & I (mainly)	Established business processing scrap metal and more recently white goods. Uses a railhead for outgoing processed materials
United Kingdom Tyre Exporters	108 Scrubs lane	MSW & C & I	Mainly transfer but with the potential for sorting waste
United Kingdom Tyre Exporters	131 Scrubs lane	MSW & C & I	Storage of Tyres for recycling

¹Baseline Information

6.1 The following references are the main sources of information that have been used in compiling this background document.

1. Hammersmith and Fulham Community Strategy, 2007 – 2014
Hammersmith and Fulham Council, September 2007

2. Joint Municipal Waste Management Strategy and Action Plan, Western Riverside Waste Authority, June 2006

¹ Additional changes have been made to this document to take account of changes in the handling of this council's own waste; recent information on capacity of Old Oak Sidings (Powerday) site; and to make specific mention to smaller waste sites.

3. Planning Policy Statement 10 Planning for Sustainable Waste Management, ODPM (now Communities and Local Government) July 2005
4. Companion Guide to Planning Policy Statement 10, Communities and Local Government June 2006
5. The London Plan, Spatial Development Strategy for Greater London, Consolidated with Alterations since 2004, Mayor of London, February 2008
6. London Waste Apportionment Study; Part B, Mayor of London, December, 2006
7. London Waste Apportionment Study, Update and Further Sensitivity Testing PN216, Jacobs UK Ltd, April 2007
8. Unitary Development Plan as amended in September 2007, Hammersmith and Fulham, September, 2007
9. Local Development Framework Core Strategy Options, Hammersmith and Fulham Council, June 2009
10. The London Plan, Spatial Development Strategy for Greater London, Consultation draft replacement plan, Mayor of London, October 2009.
11. Mayor of London, Consultation draft replacement London Plan, Schedule of early suggested changes to Maps, Figures and Tables, May 2010.