

Bethany Lester
Planning Policy
Regeneration, Planning & Housing
London Borough of Hammersmith and Fulham
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Date: 20st June 2017

To Bethany,

Hammersmith and Fulham Proposed Submission Local Plan – Thurrock Borough Council Representations

Thank you for your letter of 2nd June 2017 and your further email correspondence on this matter.

I refer to the specific issues raised regarding Thurrock Council's representations made on the Hammersmith and Fulham Proposed Submission Local Plan and in particular waste matters with regard to the Local Plan Strategic objectives and Policy CC6.

In order to further clarify and update matters since Thurrock Council submitted its representations the following comments are made.

Thurrock Council supports the Schedule of Suggested Minor Changes (as of 28th February 2017) with regards to waste matters and in particular the suggested changes MC29 to Strategic Objective 12 and the suggested changes to Policy CC6 and specifically MC184.

C, D and E Waste streams

Thurrock Council's primary objection to the proposed submission plan had been due to the failure to take account of inert waste and in particular C, D&E waste both in policy and in the lack of supporting evidence. Since Thurrock Council representations had been submitted:

The London Borough of Hammersmith and Fulham (LBHF) has produced a Schedule of Suggested changes (28th February 2017) which includes a proposed minor change (MC184) that provides additional text relating to C, D&E waste.

A Waste Technical paper (January 2017) was published by the Waste Planning Authorities in the Western Riverside Waste Authority Area (WRWA) that includes the London Borough of Hammersmith and Fulham (LBHF) and provides further evidence on waste arisings and capacity for waste streams including C, D& E waste.

There has been correspondence from the London Borough of Hammersmith and Fulham on the preparation of the local plan prior to and post submission. Furthermore there has been consultation and the opportunity in May 2017 for Thurrock to comment on the waste movements data as part of further engagement with the WRWA.

Thurrock Council are satisfied there has been continuous and ongoing engagement on waste matters under the Duty to Cooperate with the London Borough of Hammersmith and Fulham and the waste planning authorities of the Western Riverside Waste Authority.

It is also noted that the preparation of the Full Review of the London Plan will provide further opportunity to work with the Mayor and London authorities on new evidence base and policy approach including updates on Household, C&I, and C,D&E waste projections together with any GLA waste arisings reports.

For the above reasons Thurrock would wish to continue in discussion via the Duty to Cooperate process with the London Borough of Hammersmith and Fulham and WRWA regarding cross boundary movements of waste and in particular any assumptions about the role and capacity of Thurrock landfill sites to receive C,D&E waste in particular from London Boroughs.

It is noted from the current evidence on waste flows that in recent years the amount of waste import from the London Borough of Hammersmith and Fulham (LBHF) including C,D&E waste to Thurrock have been small to negligible. It is also noted that the LBHF acknowledges that most of the landfill capacity in Thurrock will have closed by 2021 and that Thurrock does not specifically plan for C,D&E waste from London.

For the record Thurrock Council reiterates the key issues with regard to Landfill for C,D&E waste in Thurrock:

It is recognised that C,D&E wastes have been a significant amount of waste exported in recent years from other London boroughs (including others in the WRWA area) and other authorities to Thurrock.

The adopted Thurrock Core Strategy in common with other waste plans in the East of England has not planned for an apportionment of C,D&E waste from London.

There is no such apportionment in the former RSS for the East of England or the adopted London Plan and its alterations.

There is no agreed apportionment of C,D&E waste from London to landfill (or other facilities) in the Wider South East or therefore, any distribution of such waste from London between the WSE authorities.

It cannot be assumed that current or previous tonnage quantities of C,D&E waste can continue to be received from the London Boroughs/Waste Authority areas or any other waste authorities to Thurrock during the remainder of the current plan period or beyond (in any proposed local plans) for the following reasons:

1. Unless subject to contract the existing inert landfill capacity identified in the Thurrock plan is not specifically apportioned for London authorities.
2. The Thurrock adopted Core Strategy identifies specific Inert landfill capacity for meeting equivalent to local requirements and does not plan for additional capacity or apportionment of London C,D&E waste during the plan period to 2026 or beyond.
3. Most landfill sites operating and receiving C,D&E waste in Thurrock are planned to close by 2020 with only one operational site at present planned to continue during the plan period to 2026.
4. There remains uncertainty over two mothballed mineral sites and the future availability of consented and potential void capacity at these sites.
5. Uncertainty regarding the levels of capacity or confirmation regarding data.
6. Unless contracted any waste export will be potentially competing for sites in Thurrock to receive such waste from within the wider south east; from major construction and excavation projects in London and wider south east areas; waste arisings for export in other waste plans in London as well as other waste requirements of the authorities in Thurrock and the East of England themselves.

Thurrock Council cannot provide detailed capacity assessment of waste sites in the borough at this stage and this information will be provided later in the year as part of the technical waste arisings and capacity report and as part of the Duty to Cooperate process for preparation of the new Thurrock Local Plan.

If you have any further queries on waste matters in Thurrock in advance of the update on capacity or wish to be updated on the sites in the future then please do not hesitate in contacting me.

Yours sincerely

A handwritten signature in black ink that reads "Richard Hatter". The signature is written in a cursive style with a large initial 'R' and a distinct 'H'.

Richard Hatter
Team Manager
Strategic Planning Policy
Thurrock Council