



London Borough of Hammersmith and Fulham
Proposed Submission Local Plan

Background Paper: Waste

February 2017

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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 proposed submission Hammersmith and Fulham Local Plan. In particular, it addresses the National Planning Policy for Waste (and associated guidance), and the London Plan 2016, including waste apportionments.

The document also demonstrates how the council is fulfilling its Duty to Co-operate obligations in relation to waste planning. Please see the council's Duty to Co-operate statement for further details.

Demonstration of how the proposed waste policies within the Proposed Submission Hammersmith and Fulham Local Plan support relevant national policy requirements is provided through the evidence presented in this background report. This includes demonstration of how 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. London Plan

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 London Plan 2016 has been considered in the formulation of the Borough's waste planning policies. 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 2026.

The London Plan sets out the spatial policies to support the Mayor's municipal and business waste strategies. The Plan includes projections of household (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 with the London Plan 2016 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 2016 waste projections (thousands of tonnes/annum): Hammersmith and Fulham

| Plan | 2016 | | 2021 | | 2026 | | 2031 | | 2036 | |
|------------------|------|-----|------|-----|------|-----|------|-----|------|-----|
| | HH | C&I | HH | C&I | HH | C&I | HH | C&I | HH | C&I |
| London Plan 2016 | 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 apportionment's allocated to Hammersmith and Fulham up to 2036 are included in the table below. The total apportionment allocated for 2036 is 247,000 tonnes.

Table 2: London Plan 2016– Hammersmith and Fulham waste apportionment

| Year | Household | Commercial and industrial waste | Total |
|------|-----------|---------------------------------|---------|
| 2016 | 69,000 | 103,000 | 172,000 |
| 2021 | 82,000 | 117,000 | 199,000 |
| 2026 | 100,000 | 138,000 | 238,000 |
| 2031 | 103,000 | 139,000 | 242,000 |
| 2036 | 106,000 | 141,000 | 247,000 |

The London Plan requires boroughs (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 council 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.

The council continues to work with the Waste Planning Authorities (WPAs) within the Western Riverside Waste Authority's (WRWA) area to identify sufficient space to provide facilities for managing their waste apportionments. A Waste Apportionments Engagement Statement was published by the four boroughs in December 2015.

In April 2015, the Old Oak and Park Royal Development Corporation (OPDC) was established to spearhead the comprehensive development of the Old Oak and Park Royal Opportunity Areas in West London, where there is potential to create 65,000 new jobs and 25,500 new homes over the next 30 years. OPDC became the local planning authority for part of the Hammersmith and Fulham area, which means that most of LBHF's existing waste sites now fall within OPDC's boundary. Some of these waste sites are being considered for redevelopment as part of plans to develop new homes and jobs in OPDC area. For the purposes of joint working, OPDC is included within the WRWA grouping of authorities.

4.1 Local Authority Collected Municipal Waste

Hammersmith and Fulham waste collection authority collected 75,395 tonnes of municipal waste in 2015/16. This consisted of household waste and any commercial waste that the council collects under contract.

Waste generated by commercial and industrial uses is generally collected by private waste operators or the council under contract arrangements. In 2015/16 LBHF collected 23,598 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 75,395 in 2015/16, the council's percentage of household waste sent for reuse, recycling or composting has also fallen. In 2015/16, 22% 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 may prove difficult to achieve the London Plan 2016's targets for at least 45% cent of waste to be recycled/composted by 2020. The London Waste Planning Forum Monitoring Report 2015 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 3 highlights some key waste collection figures for the Borough, taken from the Environment Agency's November 2015/16 reporting.

**Table 3: Key waste measures–
London Borough of Hammersmith and Fulham Waste Collection Authority 2015/16**

| | |
|---|--------------------|
| Total LBHF collected waste (tonnes) | 75,395 |
| Residual household waste per household (kg/household) | 475.0 kg/household |
| Percentage of household waste sent for reuse, recycling or composting | 22% |
| Collected household waste per person (kg) | 288.3 kg |

Source: Environment Authority, ENV18 - Local authority collected waste: annual results tables April 2016/16

Waste collected by the council is managed for disposal by the WRWA along with waste collected from Kensington and Chelsea, Wandsworth and Lambeth. The council is therefore statutorily required to deliver its local authority collected waste to places as directed by the WRWA. 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 2014-15 this was reduced to 365,662 tonnes (total locally collected waste). The WRWA suggests that this reduction has been brought 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.

A thirty year waste management services agreement is in place between WRWA and Cory Environmental Ltd to dispose of the 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 goes to the WRWA facilities in the London Borough of Wandsworth for transfer and treatment (Western Riverside Transfer Station near Wandsworth Bridge and Cringle Dock Transfer Station next to Battersea Power Station. Since 2011, recyclables go to the Material Recycling Facility at Smugglers Way close to Wandsworth bridge.

Residual waste (non-recyclable) 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.

5. WRWA WPA's Joint Waste Technical Paper (2017)

While it is possible for the authorities to develop a jointly prepared waste plan, the WPA's within the WRWA area have elected to deal with waste planning matters through their respective Local Plans, while continuing to work closely together, for example through joint evidence base work to underpin Local Plan policies and joint engagement work.

LBHF have jointly prepared a Waste Technical Paper with the WPA's within the WRWA area including OPDC (for land within LBHF). The study provides up to date evidence for the Western Riverside Waste Planning Authorities to support meeting their waste apportionments as required by the London Plan (2016). The Waste Technical Paper takes into account site closures and also includes details on the management of other waste streams not apportioned in the London Plan (construction, demolition & excavation, low level radioactive, agricultural, hazardous and waste water). This evidence base work will underpin Local Plan policies on waste being developed by the WPA's within the WRWA area.

As shown in Table 4, two large waste sites (Powerday & EMR) and some other smaller sites exist within LBHF. Since April 2015, the Old Oak area and the five waste sites within the north of the borough, now fall within the boundary of the OPDC.

Table 4 permitted waste sites in LBHF

| Operator (WPA) | Address | Facility type | Input Waste type(s) | Site area (ha) | Waste Source | Permitted capacity (tpa) | Actual input (tpa) 2015 | Actual input (tpa) 2014 | Actual input (tpa) 2013 | Actual input (tpa) 2012 | Capacity applicable to London Plan Apportionment |
|---|---|---|----------------------------|-----------------------|---------------------|---------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|---|
| United Kingdom Tyre Exporters Ltd (OPDC) | 108 Scrubs Lane, Willesden, London, NW10 6QY | Non-Haz Waste Transfer | CD&E waste | 0.32 | CD&E | 244,305 | 33,513 | 48,805 | 46,405 | 23,036 | 0 |
| EMR (Mayer Parry Recycling Ltd) (OPDC) | 106 Scrubs Lane, Willesden, London, NW10 6QY | Metal Recycling, vehicle depollution , end of Life fridge treatment | Vehicles, Metals, Fridges | 4.4 | HH, C&I | 419,000 | 150,132 | 114,549 | 123,393 | 194,393 | 0 (assumes site used for re-development) |
| Orpin Jane (LBHF) | 145 Goldhawk Road, Shepherds Bush, London W12 8EN | Car breaker/ vehicle end of life | Vehicles | - | Vehicles | 5 | 2 | 4 | 3 | 3 | 0 |
| Powerday P L C (OPDC) | Old Oak Sidings, Off Scrubs Lane, Willesden, London, NW10 6RJ | Material Recycling Facility | Residual and recycling | 3.9 | C&I, CD&E | 1,600,000 | 347,448 | 346,323 | 359,643 | 355,931 | 681,000 |
| O'Donovan Waste Disposal | Scrubs Lane, Willesden | Material Recycling | - | 0.27 | | | No data available | | | | 0 |

| Operator (OPDC) | Address | Facility type | Input Waste type(s) | Site area (ha) | Waste Source | Permitted capacity (tpa) | Actual input (tpa) 2015 | Actual input (tpa) 2014 | Actual input (tpa) 2013 | Actual input (tpa) 2012 | Capacity applicable to London Apportionment |
|---------------------------------|----------------------------------|------------------------------------|----------------------------|-----------------------|---------------------|---------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|--|
| | London | Facility, waste storage & transfer | | | | | | | | | |
| Capital Waste Ltd (OPDC) | 104 Scrubs Lane Willesden London | Metals Recycling Facility | Metals | 0.26 | | | No data available | | | | 0 |

LBHF London Plan Apportionment

In each WPA and the WRWA as a whole, current and future waste management capacity was identified. This was reviewed using a number of data sources, including the EA “active sites” data, permitting data and direct discussions with operators. For each waste site, its assumed operational capacity was assessed against the criteria in the London Plan¹. By comparing apportionment targets per WPA, with available capacity that meets the London Plan criteria, capacity surpluses or shortfalls were identified per WPA.

Part of the OPDC falls within LBHF, and therefore a certain proportion of LBHF’s waste arisings and capacity will be derived from the OPDC area. AS OPDC does not have a waste apportionment target in the current London Plan, the London Plan requires Mayoral Development Corporations to co-operate with boroughs to ensure that their waste apportionments are met.

Table 4 (above) shows the permitted waste sites in LBHF and identifies the capacity that is applicable to meeting the London Plan apportionments. For each site, this is explained in more detail below.

The Powerday (Old Oak Sidings) site is approximately 3.9 hectares and was opened in 2006 under a wide ranging licence to manage up to 1.6 million tonnes of waste per annum. The Powerday site takes commercial & industrial and construction wastes as input to produce a range of recyclates and a quality RDF for export outside of the UK. The input material, being from commercial rather than municipal sources, contains a high level of biogenic materials such as wood, paper and cardboard, and relatively low moisture levels. A front end separation removes up to 15% of the input waste as recyclable materials such as metals, with shredders, air knife sorters, screens and manual picking stations able to produce a final fuel which meets their customers’ specification. To meet the requirements of the London Apportionment, the RDF needs to be “produced as a “biomass fuel” as defined in the Renewable Obligation Order” i.e. at least 90% of its energy content needs to be derived from biogenic material. Powerday produce for their current market RDF with biogenic *by weight content* of >50%, but do not have the data to relate this to *energy content* as this is not a requirement of their current customers. However, with the range of separation and processing techniques available at the Powerday facility, with manual picking able to “fine tune” final product quality, it has been assumed that the facility is likely to be capable of meeting the London Plan requirements by producing a “biomass fuel” as defined in the Renewable Obligation Order from input commercial and industrial waste.

The site manages both household/commercial/industrial waste and construction/demolition waste. Currently, the Powerday facility predominantly deals with construction waste, however over the past few years it has been accepting a proportion of other non-construction wastes (household/commercial/industrial). Over the last four years, this has averaged at 36% of the throughput of the site, maximising at 42.6% in 2014. The Powerday site has a licensed capacity to treat up to 1.6m tonnes of waste per annum, however as Table 4 shows, it has not been operating at its full capacity. The operators have explained that this is not due to operational restrictions on the site, but partly due to the market and conditions on the planning application, which require one third of the licensed capacity to be transported to and from the site by rail, and another third to be transported to and from by canal.

In 2014, the site received 147,428 tonnes of household/commercial/industrial waste out of a total of 346,322 tonnes of waste received. This represented approximately 42.6% of waste received at the site. Based on this proportion and the licence capacity for 1.6 million tonnes, it is estimated that the site has the capacity to manage a maximum of 681,000 tonnes of household and commercial and industrial waste (subject to market variation and realising the potential of rail and canal for waste transport). The operators of the Powerday site have confirmed that this throughput is achievable if the market demands it and therefore all of this capacity (681,000) has been included to meet the London Plan apportionments.

The EMR (Mayer Parry Recycling) site is approximately 4.4 hectares and received 96,276 tonnes of household/commercial/industrial waste in 2014. 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

¹ London Plan Policy 5.17 para 5.79

the short to medium term, it is not proposed to count this capacity towards meeting the borough's waste apportionment as the EMR site is proposed for redevelopment in order to facilitate regeneration of the Old Oak area, within the boundary of OPDC.

For the three other smaller waste sites within the OPDC area (Capital, O'Donovan & UK Tyre Exports) data has been unable to be sourced on the waste movements of these sites. Given their size, it is anticipated that any waste imports and exports would be significantly smaller than those associated at Powerday and EMR. Alongside, the EMR site these waste sites are proposed for redevelopment by the OPDC in order to facilitate regeneration of Old Oak area, meaning capacity has not been counted towards meeting the London Plan apportionments. The Orpin Jane waste site identified in LBHF, specialises in vehicle dismantling and is of a considerably small size. Given its permitted capacity and the specialist waste it receives; this capacity is not considered appropriate to count towards meeting the London Plan apportionments.

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 (0.49h) is being used for the construction of the Thames Tideway Tunnel and will not be available for approximately 10 years and that Comleys (0.44h) and Swedish (0.55h) wharves are both in use and also subject to a planning application for mixed use, including concrete batching and residential. Therefore, in the Waste Technical Paper none of this capacity has been considered to be applicable to meeting the London Plan apportionments.

Overall, the Waste Technical Paper concludes that LBHF, including OPDC have surplus capacity against its London Plan apportionment of 537ktpa in 2016, reducing to 462ktpa in 2036. This demonstrates there is sufficient capacity at the Powerday site to meet LBHF's apportionments.

OPDC prepared a draft Local Plan which was published for consultation in February 2016 and was accompanied by a draft Waste Strategy. The draft waste strategy demonstrates how OPDC could help constituent boroughs, including LBHF, meet the apportionment targets in the London Plan. The strategy demonstrates that there would be sufficient capacity at the Powerday site to meet LBHF's London Plan apportionment targets and on, this basis, OPDC's Draft Local Plan identifies and is seeking to safeguard the Powerday site. OPDC is not proposing to safeguard the remaining waste sites (including the EMR), which will be redeveloped to facilitate regeneration of the Old Oak area. For LBHF, the strategy shows that there would be sufficient capacity at the Powerday site to meet LBHF's London Plan apportionment targets.

Based on both of these evidence base studies, the council therefore considers that the Powerday site has sufficient capacity to meet LBHF's apportionment targets. The council will therefore continue to work with OPDC and encourage them to safeguard the Powerday site in their emerging Local Plan.

WRWA WPA's London Plan Apportionments

Totalling all available capacity within the WPA's within the WRWA area, collectively there is surplus capacity against the London Plan apportionments of 346ktpa in 2016, reducing to 48ktpa in 2036. In light of this, the council is also looking at the potential for pooling apportionment requirements with the other WPA's within the WRWA area. Discussions on this are still ongoing.

Construction, demolition & excavation waste (CD&E)

CD&E waste comprises of waste arising from the construction and demolition industries, including excavation during construction, and is made up of mainly inert materials such as stone, soil, concrete, brick and tile. However, there are also non-inert elements such as wood, plastic and cardboard.

Although not apportioned in the current London Plan (2016), national planning policy guidance requires WPA's to consider of the management of CD&E waste. In the Waste Technical Paper, the overall waste arisings for CD&E waste have been based on a baseline year of 2015 and forecast using anticipated

commercial and housing development for each borough up to 2036. However, this does not include CD&E waste from London wide strategic infrastructure, which the GLA is currently investigating.

The joint Waste Technical Paper forecasts arisings of 158,921tpa of construction, demolition, and excavation (CD&E) waste in LBHF by 2036, with a total of 507,626tpa forecast for the WRWA area up to 2036. The study demonstrates that there is surplus capacity for the sorting, transfer and treatment of CD&E waste within the WRWA, with a surplus of 317,000 tonnes in 2016, increasing to approximately 627,000 tonnes in 2036.

Low Level Radioactive Waste

Low Level radioactive waste consists largely of paper, plastics and scrap metal items that have been used in hospitals, research establishments and the nuclear industry. There are no facilities within the WRWA area for the processing of such material. Some activities which involve radioactive substances require a permit from the EA. These are recorded on the EA's Home of Public Registers. A search for Hammersmith and Fulham reveals 11 environmental permit holders for radioactive substances. The majority of these are health care, hospitals, medical research organisations and universities. These operations are required to make arrangements for the management and disposal of radioactive substances in accordance with the Environmental permitting (England and Wales) Regulations SI 2010.

The latest available data for this type of waste is the Pollution Inventory Dataset from 2013. However, this type of waste is reported in Becquerel's. Over 8.6 million MBq was identified to be disposed of by the WPA's within the WRWA area. All of the waste identified as being generated within the WPA's within the WRWA was reported to be disposed of either to air or to waste water and therefore places no requirement on waste management infrastructure.

Hazardous Waste

Hazardous waste is categorised as that which is harmful to human health, or the environment either immediately or over time. Examples of hazardous waste includes, asbestos, chemicals, batteries, oils, solvents as well as electrical goods and certain types of healthcare waste.

Hazardous waste is difficult to quantify as not all hazardous waste is recorded in the same way. Hazardous waste also requires a range of specialist facilities for treatment and disposal and so often this waste travels further than types of non-hazardous waste.

This waste stream forecast is based on the GLA's waste arisings figures. Estimates of hazardous waste were collated from the EA WDI (2015). Currently, in the WRWA area, 6.6ktpa of hazardous waste is being produced, with 6.7ktpa expected in 2036. The EA's Active Sites listing for 2015 identifies around 90ktpa of permitted hazardous waste capacity within the WRWA area, consisting of clinical waste transfer, vehicle depollution sites and car breakers. This total capacity is in excess of the waste arisings forecast for hazardous waste in the WRWA area and therefore no provision needs to be made for additional capacity.

Agricultural Waste

In 2006, Waste Management Regulations for agricultural waste was defined as waste from premises used for agriculture within the meaning of the Agriculture Act 1947. The Chartered Institute of Waste Management refers to it as waste which has been produced on a farm in the course of 'farming'. Due to the urban nature of the boroughs within the WRWA area, no waste from agricultural sources has been reported. Therefore, there are no requirements for agricultural waste facilities.

Wastewater

Thames Water is responsible for wastewater and sewage sludge treatment in London and manages sewerage infrastructure as well as sewage treatment works.. 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: Minimising Flood Risk and Reducing Water Use).

Other Waste

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.

6. Waste imports to Hammersmith and Fulham:

The Environment Agency's Waste Data Interrogator (WDI) 2014 and 2015 has been used to identify waste imports and exports to/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 data reveals that in 2014 509,679 tonnes of waste was imported to LBHF, with 531,095 imported to LBHF in 2015. This was primarily handled by the Powerday and EMR site. The data recorded in the WDI 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 346,323 tonnes of waste in 2014 and 347,447 tonnes of waste in 2015, with the majority being from within London. Waste received at the EMR site was recorded as being from the South East region. Further details of waste imports are recorded in Table 5.

The data within Table 5 reveals the significance of the two 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 the South East. 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 being managed (as opposed to produced) within Hammersmith and Fulham.

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.

Table 5 - Waste imported to Hammersmith and Fulham (over 1 tonne) (WDI 2014 and 2015)

| Year | Waste Site Operator | Waste Category | Origin Waste Planning Authority (WPA) | Origin Region | Tonnes Received |
|-------------|-----------------------------------|-----------------------------------|--|----------------------|------------------------|
| 2014 | Powerday P L C | Inert/Construction and Demolition | WPA not codeable (London) | London | 198,894 |
| 2015 | Powerday PLC | Inert/Construction and Demolition | WPA not codeable (London) | London | 231,949 |
| 2014 | Powerday P L C | Household/Industrial/Commercial | WPA not codeable (London) | London | 147,428 |
| 2015 | Powerday PLC | Household/Industrial/Commercial | WPA not codeable (London) | London | 115,329 |
| 2014 | Powerday P L C | Hazardous | WPA not codeable (London) | London | 186.651 |
| 2015 | Powerday PLC | Hazardous | WPA not codeable (London) | London | 169.3 |
| 2014 | United Kingdom Tyre Exporters Ltd | Inert/Construction and Demolition | WPA not codeable (South London) | South London | 48,804 |
| 2015 | United Kingdom Tyre Exporters Ltd | Inert/Construction and Demolition | WPA not codeable (South London) | South London | 31,051 |
| 2014 | Mayer Parry Recycling Ltd (EMR) | Household/Industrial/Commercial | WPA Not codeable (South East) | South East | 96,276.21 |
| 2015 | Mayer Parry Recycling Ltd (EMR) | Household/Industrial/Commercial | WPA not codeable (South East) | South East | 133,232 |
| 2014 | Mayer Parry Recycling Ltd (EMR) | Hazardous | WPA Not codeable (South East) | South East | 18,273. |

| Year | Waste Site Operator | Waste Category | Origin Waste Planning Authority (WPA) | Origin Region | Tonnes Received |
|------|---------------------------------|----------------|---------------------------------------|---------------|-----------------|
| 2015 | Mayer Parry Recycling Ltd (EMR) | Hazardous | WPA Not codeable (South East) | South East | 16,899 |

Source: Environment Agency, Waste Data Interrogator, 2014 and 2015

7. Waste exports from Hammersmith and Fulham

Overall, the WDI data reveals that approximately 479,469.133 tonnes of waste was exported from Hammersmith and Fulham to other Waste Planning Authorities in 2014 and 519,980 tonnes exported in 2015. This 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 the purposes of waste planning, the duty to cooperate is considered to be most relevant to local planning authorities that receive waste from LBHF. Although, the movement of waste between authority areas is inevitable given the operation of the market, issues between local planning authorities may arise where exported waste is disposed of through landfill. Particularly, where landfill sites are proposed to close and where local authorities are seeking to restrict the disposal of imported waste to landfill in that area.

For waste movements where a receiving waste planning authority is recorded, Tables 6 and 7 provide details of waste exported to landfill for years 2014 and 2015. The WDI data reveals waste from Hammersmith and Fulham was distributed to a range of waste facilities both within and outside of London. This was primarily inert construction and demolition waste.

In addition to the waste identified in tables 6 and 7, 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 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 6 - Waste exported to landfill from Hammersmith and Fulham (2014 Waste Data Interrogator)

| Receiving Authority | Waste Site Name | Operator | Basic Waste Category | Tonnes exported |
|---------------------------------|------------------------------|---------------------------------------|-----------------------------------|-----------------|
| Buckinghamshire Country Council | Park Lodge Landfill Site | Brett Aggregates Limited | Inert/construction and demolition | 540 |
| Buckinghamshire County Council | Gerrards Cross Landfill Site | Veolia ES Landfill Limited | Inert/construction and demolition | 3,16.5 |
| Dorset County Council | Hengrove Farm Landfill | Henry Streeter (Sand & Ballast) Ltd | Inert/construction and demolition | 504 |
| Essex County Council | Pitsea Landfill | Veolia ES Landfill Limited | Inert/construction and demolition | 3,910.7 |
| London Borough of Havering | Rainham Landfill | Veolia ES Landfill Limited | Inert/construction and demolition | 19,103.128 |
| Hertfordshire County Council | Great Westwood Landfill | Cemex U K Materials Ltd | Inert/construction and demolition | 663 |

| Receiving Authority | Waste Site Name | Operator | Basic Waste Category | Tonnes exported |
|--------------------------------|--|-------------------------------------|-------------------------------------|-----------------|
| London Borough of Hillingdon | Sipson North East Inert Landfill | Henry Streeter (Sand & Ballast) Ltd | Inert Landfill | 3,8428 |
| Milton Keynes Council | Bletchley Landfill Site | FCC Waste Services (UK) Limited | Inert/construction and demolition-n | 657.14 |
| Slough Borough Council | Horton Brook Quarry | Jayflex (Aggregates) Ltd | Inert/construction and demolition | 105 |
| Surrey County Council | Redhill Landfill (North East Quadrant) | Biffa Waste Services Ltd | Household/Industrial/Commercial | 4.14 |
| Surrey County Council | Redhill Landfill (North East Quadrant) | Biffa Waste Services Ltd | Inert/construction and demolition | 100 |
| Thurrock Council | East Tilbury Quarry | S Walsh And Son Limited | Inert/construction and demolition | 3,082.54 |
| Oxfordshire County Council | Sutton Courtenay | Waste Recycling Group (Central Ltd) | Inert/construction and demolition | 190.98 |
| Essex County Council | Highwood Quarry Landfill | Sewells Reservoir | Inert/construction and demolition | 340 |
| Surrey County Council | Home Farm Extension | Shepperton Aggregates | Inert/construction and demolition | 4,073 |
| Buckinghamshire County Council | Calvert Landfill | FCC Waste Services | Inert/construction and demolition | 4,345.8 |

Source: Environment Agency, Waste Data Interrogator, 2014

Table 7 - Waste exported to landfill from Hammersmith and Fulham (2015 Waste Data Interrogator)

| Receiving Authority | Waste Site Name | Operator | Basic Waste Category | Tonnes exported |
|---------------------------------|------------------------------|----------------------------|-----------------------------------|-----------------|
| Buckinghamshire Country Council | Park Lodge Landfill Site | Brett Aggregates Limited | Inert/construction and demolition | 2,682 |
| Buckinghamshire County Council | Gerrards Cross Landfill Site | Veolia ES Landfill Limited | Inert/construction and demolition | 2,250 |
| Essex County Council | Pitsea Landfill | Veolia ES Landfill Limited | Inert/construction and demolition | 3,910.7 |
| London Borough of Havering | Rainham Landfill | Veolia ES Landfill Limited | Inert/construction and demolition | 15,556 |
| Hertfordshire County Council | Great Westwood Landfill | Cemex U K Materials Ltd | Inert/construction and demolition | 2,414 |

| Receiving Authority | Waste Site Name | Operator | Basic Waste Category | Tonnes exported |
|---------------------------------------|----------------------------------|-------------------------------------|-----------------------------------|------------------------|
| London Borough of Hillingdon | Sipson North East Inert Landfill | Henry Streeter (Sand & Ballast) Ltd | Inert/construction and demolition | 34,950 |
| Milton Keynes Council | Bletchley Landfill Site | FCC Waste Services (UK) Limited | Inert/construction and demolition | 23,304 |
| Slough Borough Council | Horton Brook Quarry | Jayflex (Aggregates) Ltd | Inert/construction and demolition | 570 |
| Surrey County Council | Redhill Landfill | Biffa Waste Services Ltd | Inert/construction and demolition | 102.28 |
| Essex County Council | Highwood Quarry | Sewells Reservoir | Inert/construction and demolition | 505 |
| Buckinghamshire County Council | Calvert Landfill | FCC Waste Services | Inert/construction and demolition | 1,180 |
| Surrey County Council | Home Farm Extension | Shepperton Aggregates | Inert/construction and demolition | 30,314 |

Source: Environment Agency, Waste Data Interrogator, 2015

The WRWA WPA's Waste Technical Paper provides further details on waste movements (exports and imports) between the WRWA area and other authorities for non-hazardous waste, hazardous waste and inert waste including excavation waste. As part of the duty to cooperate further engagement work is due to take place on the findings of the Waste Technical Paper as well as the waste movements identified within it. This engagement work will be undertaken jointly with the other WPA's within the WRWA.

8. Proposed Submission Local Plan Policy Approach

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 London Plan does 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.

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)

The council's spatial planning policy in relation to strategic waste management is outlined in Borough-wide Policy CC6: 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 8: Proposed Submission Local plan waste policy approach

| Policy | Implementation |
|--|--|
| <ul style="list-style-type: none"> Planning to manage 247,000 tonnes per annum of waste in LBHF by 2036; | <ul style="list-style-type: none"> Since April 2015 Old Oak Sidings (Powerday) and EMR waste sites fall within the boundary of the Old Oak and Park Royal Development Corporation. The council notes that the London Plan (2016) states in paragraph 5.80 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”. The OPDC draft Waste Strategy and the WRWA WPA’s Waste Technical Paper demonstrates that there is sufficient capacity at the Powerday site to meet LBHF’s apportionment targets. On this basis, OPDC’s draft Local Plan identifies and is seeking to safeguard the Powerday site. OPDC have confirmed that they will continue to work with the council to ensure our apportionments are met. As well as working with OPDC, the council is also looking at the potential for pooling apportionments with the other waste planning authorities within the WRWA area. 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 Boroughwide Policy CC7: On-site Waste Management 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 the 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. | <ul style="list-style-type: none"> Maximising the use of the River Thames where possible Powerday has a rail head and canal dock but does not currently utilise these, LBHF & OPDC will work with waste operators and statutory bodies to maximise the use of rail and canal for waste movements. This could also increase the throughput at the Powerday site, helping it to achieve its full licensed capacity. |

9. 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. 'ENV18 - Local authority collected waste: annual results tables 2015/16'. <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 Planning Forum Monitoring Report 2015. London Waste Planning Forum Annual Monitoring Report 2015
<https://khub.net/documents/6784472/0/London+Waste+Monitoring+Report+2015/73ce57c3-5579-4b4a-b04e-c0b78bcd5>
- Wastedataflow database 2015/16, 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>
- Western Riverside Waste Authority Waste Planning Authorities Waste Apportionments Engagement Statement, December 2015.
- Western Riverside Waste Planning Authorities Waste Technical Paper 2017