

Wandsworth Local Plan Review: Waste Evidence Base Addendum Meeting London Plan Apportionment Targets

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Executive Summary

- I. The London Borough of Wandsworth is preparing a new Local Plan and held a public consultation on the Publication Draft Local Plan (Reg 19 stage) from 10 January to 28 February 2022. As part of the consultation the Greater London Authority (GLA) submitted a Statement of General Conformity on the Reg 19 Local Plan.
- II. Although no issues of non-conformity were raised with regards to draft Local Plan waste policy LP13, the GLA believe that Wandsworth should take a more proactive approach to delivering additional waste management capacity in the Borough to meet their apportionment targets. The GLA suggest this could be achieved by:
 - Allocating more waste sites within the borough or outside
 - Intensification of existing waste management sites
 - Entering into joint arrangements with other boroughs for them to take on Wandsworth's apportionment targets
- III. Wandsworth's approach to waste planning meets all the London Plan policy requirements. New waste capacity to close Wandsworth's capacity gap is directed towards existing facilities, safeguarded wharves, Strategic Industrial Land (SIL) and Locally Significant Industrial Areas (LSIAs).
- IV. Following a review of sites, no individual sites suitable for allocation for waste uses in the Local Plan have been identified, other than existing waste sites. Sites outside Wandsworth cannot be allocated through its Local Plan.
- V. There is likely to be an upgrade to the existing Waste Authority facilities but the timescales and capacity increase are as yet unknown. There are no known plans to increase the throughput of any merchant facilities, which are all operating at optimal capacity, and there are no current plans to bring the non-operational site back into waste use.
- VI. There is no opportunity to work collectively with the Western Riverside authorities to pool apportionment targets and plan for waste collectively because OPDC do not agree to do so.
- VII. No other London Boroughs are currently in a position where they have surplus capacity and are at a stage in their Plan-making process to offer surplus capacity to Wandsworth. This position may change after Bexley's Local Plan examination and as the East London Boroughs begin the process of reviewing the East London Waste Plan.

1. Introduction

1.1 The London Borough of Wandsworth is preparing a new Local Plan and held a public consultation on the Publication Draft Local Plan (Reg 19 stage) from 10 January to 28 February 2022.

1.2 As part of Wandsworth's duty to co-operate, a meeting was held with the Greater London Authority (GLA) to discuss any issues of conformity with the London Plan. In their subsequent Statement of General Conformity on the Reg 19 Local Plan, no issues of general conformity were raised by the GLA on draft Local Plan waste policy LP13.

1.3 Although no issues of non-conformity were raised with regards to the draft Local Plan waste policy, the GLA believe that Wandsworth should take a more proactive approach to delivering additional waste management capacity in the Borough to meet their apportionment targets. The GLA suggest this could be achieved by:

- Allocating more waste sites within the borough or outside
- Intensification of existing waste management sites
- Entering into joint arrangements with other boroughs for them to take on Wandsworth's apportionment targets

1.4 This Addendum to the Waste Evidence Base sets out Wandsworth's approach to meeting its waste apportionment targets and provides evidence that this approach is in line with London Plan policy requirements. The Addendum considers the barriers to allocating specific sites for waste use and the opportunities to intensify existing waste sites, summarises Wandsworth's efforts to work jointly with the Western Riverside authorities and assesses each London Borough's ability to help Wandsworth meet its capacity gap.

2. Wandsworth's approach to meeting apportionment targets

2.1 The London Plan (March 2021) states that London should manage as much of its waste within its boundaries as practicable, aiming to achieve waste net self-sufficiency by 2026 in all waste streams except for excavation waste. To help meet this aim, Policy SI8.B.3) requires development plans to *"allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste, as set out in Table 9.2"*.

2.2 Wandsworth's apportionment targets set out in Table 9.2 are set out below. Note the London Plan only includes apportionment targets for 2021 and 2041 and the figures for the intervening years are calculated from Wandsworth's proportion of the total.

Table 1: Wandsworth’s apportionment targets (tonnes)

	2021	2026	2031	2036	2041
LACW/C&I waste apportioned to Wandsworth in the London Plan ¹	264,000	266,000	268,000	274,000	280,000

Source: London Plan (March 2021)

2.3 In planning for waste, Wandsworth have prepared a Waste Evidence Base which assesses existing capacity and identifies a shortfall in capacity to meet the London Plan apportionment targets. The amount of new capacity required is set out in the table below and this equates to up to 2.1ha of land depending on the type of facility. Note that the measure for monitoring is new capacity and not land take.

Table 2: Wandsworth's waste management capacity gap (tonnes)

Waste Stream	2021	2026	2031	2036
LACW and C&I	116,456	118,456	120,456	126,456

Source: Wandsworth’s Waste Evidence Base (July 2020)

2.4 While there is currently a capacity gap for apportioned waste, it should be noted that the need is not “immediate” as the target of net self-sufficiency for waste management is not until 2026.

2.5 Wandsworth’s draft Local Plan Policy LP13 meets the requirements of Policy SI8.B.3) by safeguarding existing waste sites, and identifying suitable designated industrial areas for new waste facilities to make up the shortfall in capacity for managing apportioned waste. New waste capacity to close Wandsworth’s capacity gap is directed towards existing facilities, safeguarded wharves, Strategic Industrial Land (SIL) and Locally Significant Industrial Areas (LSIAs). Existing waste sites are identified and safeguarded through policy LP13 clause D, Safeguarded Wharves are identified under Policy LP40 and SIL and LSIA are identified under Policy LP34.

2.6 Although the London Plan also identifies the allocation of sites as an appropriate way to meet apportionment targets, no individual sites have come forward for allocation (see section 3 below).

2.7 It is noted that the GLA’s Statement of General Conformity states that Wandsworth’s draft Local Plan “does not identify any specific additional sites or areas for waste.” However, the draft Local Plan does identify areas suitable for new waste facilities, as set out above.

2.8 In summary, Wandsworth’s approach to waste planning meets all the London Plan policy requirements.

¹ Apportionment targets in the London Plan are provided for 2021 and 2041 only. The figures for years 2026, 2031 and 2036 have been estimated using Wandsworth’s apportionment share of 3.2% of the overall waste arisings in London.

3. Allocating Waste Sites

- 3.1 Allocating sites for waste uses requires the identification of individual sites which can be safeguarded and delivered for waste uses. This is achieved through a ‘call for sites’ to encourage developers to submit their sites to be included in the Local Plan and/or through a site search undertaken by the local authority. Wandsworth’s [Site Allocations Methodology Paper](#) (January 2022) sets out how sites were assessed for inclusion in the Local Plan site allocations. No additional waste sites were identified through this exercise.
- 3.2 A call for sites was undertaken during the preparation of Wandsworth’s Local Plan and no waste sites were submitted by operators during this time. This is not unusual as waste operators rarely put forward sites to be included in a Local Plan or Waste Plan. This is because operators work to shorter timescales than Local Plans, and operators prefer the flexibility of an ‘area of search’, usually an industrial estate, which offer a number of options for potential sites. In addition, operators do not always own the land on which they operate.
- 3.3 Wandsworth is reliant on the market to deliver capacity to meet C&I and C&D waste management facilities (see section 4 for further information on the intensification of the Disposal Authority’s facilities for LACW). Wandsworth is not required to build the waste capacity itself, but is required, by the NPPW and London Plan, to create the opportunities for the market to deliver new waste facilities. The London Plan does not require Boroughs to deliver waste capacity themselves, but to “allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste, as set out in Table 9.2.” Wandsworth’s draft Local Plan does this through Policy LP13 clause F which states:
- “New waste capacity to close Wandsworth’s capacity gap is directed towards existing facilities, safeguarded wharves, and SIL and LSIA’s. Applications for waste facilities outside of these areas will need to demonstrate that it is not feasible to develop the proposed facility in one of these preferred locations.”*
- 3.4 There is no guarantee that the market will deliver new waste management capacity and therefore Wandsworth’s cannot commit to close the gap, only seek to do so. Unlike housing which offers a profitable return for developers when they sell the units, waste facilities are essential infrastructure and operators need to have a sound strategy and business case, such as long-term contracts, to build a new facility. A new waste facility needs to be viable and with as few constraints as possible. Constraints include high land values, poor road networks for large vehicles, sensitive neighbouring uses and local objections. It is therefore difficult for new operators to establish themselves in a borough like Wandsworth which has any number of the constraints outlined above.
- 3.5 It should also be noted that allocating a site for waste uses does not mean that the site will be developed for a waste use. In previous years, a number of boroughs have allocated sites for waste uses, for example the West London and East London Boroughs

in their respective waste plans. No site allocated for waste use in the West London Waste Plan or East London Waste Plan has come forward for waste uses since they were adopted. In these cases the allocation simply prevented other development from being brought forward on the site. Allocating a site for waste use with no operator committed to developing the site could be seen as contrary to the NPPF test of soundness c) which requires that a Local Plan is deliverable (see also NPPF paragraph 16b).

3.6 It is not clear what is meant by the GLA's suggestion in their Statement of General Conformity to 'allocate more waste sites outside the Borough'. Sites outside Wandsworth cannot be allocated through its Local Plan.

3.7 In conclusion, following a review of sites, no individual sites suitable for allocation for waste uses in the Local Plan have been identified, other than existing waste sites.

4. Intensification of Existing Sites

4.1 The London Plan makes it clear that waste management capacity of existing sites should be optimised and encouragement for this is included in the supporting text of Wandsworth's Local Plan policy LP13. It should be noted that Wandsworth does not have the powers to demand the intensification of existing waste sites where there is no plan to do so by the operator and/or if no planning application comes forward for an existing waste site. Where a new facility comes forward through the planning process, these will be required to demonstrate that the site capacity has been optimised (London Plan policy D3).

4.2 Wandsworth's Waste Evidence Base (July 2020) contains Site Profiles which assess if there is opportunity to upgrade or intensify existing facilities. The potential to intensify existing facilities was assessed by three methods:

- Engagement with the operator to ascertain if there are any plans to upgrade the facility or increase throughput;
- Opportunity to extend operational hours in accordance with planning permission; and
- Assessment of each facility against the average throughputs for the type of facility and waste stream.

4.3 The Waste Evidence Base notes that no operator contacted at the time had plans to upgrade the facility or increase throughput. All the operating facilities which 'manage' waste have an average or above-average throughput which suggests they are operating at optimal capacity. The Waste Evidence Base also noted a possible opportunity for the Suez waste transfer station (WTS) to increase its 'management' throughput by extending its operational hours to 24/7, which is allowed by the extant planning permission. However, Suez do not currently have any plans to do so.

4.4 There is one non-operational safeguarded waste sites in the Borough which is used by Biffa as a depot for waste collection vehicle parking and bin storage. Biffa has no plans

to change the use of this site and so there is currently no opportunity for new waste management capacity.

4.5 As part of the Regulation 19 Local Plan consultation in January 2022, the Western Riverside Waste Authority (WRWA) have notified the council of the future need to upgrade their facilities in light of the collection and recycling requirements set out in the Environment Act 2021. While the details of the upgrades, including any additional waste management capacity, and timescales are not yet known this will be monitored.

4.6 In summary, there is likely to be an upgrade to the existing WRWA facilities but the timescales and capacity increase are as yet unknown. There are no known plans to increase the throughput of any merchant facilities, which are all operating at optimal capacity, and there are no current plans to bring the non-operational site back into waste use.

5. Opportunities to pool apportionment requirements

5.1 Policy SI8.B.3) also encourages boroughs to collaborate by pooling their apportionment requirements.

5.2 Wandsworth is one of four London Boroughs, along with Kensington & Chelsea, Hammersmith & Fulham and Lambeth, for which the Western Riverside Waste Authority (WRWA) is the statutory waste disposal authority for household waste.

5.3 In light of this existing waste relationship, the Western Riverside Boroughs, along with the Old Oak Common and Park Royal Development Corporation (OPDC), which covers part of Hammersmith and Fulham, agreed in 2016 to work together to prepare a joint waste technical paper. Although OPDC does not have an apportionment target, it is a waste planning authority and is required by the London Plan to cooperate with its host Boroughs to meet identified waste needs.

5.4 The purpose of the Western Riverside Waste Technical Paper (WTP) was to provide an up-to-date evidence base to support waste planning. The WTP was published in January 2017 and showed there was sufficient waste management capacity across the Western Riverside authorities to meet the collective apportionment targets.

5.5 Once the WTP was completed, the Western Riverside authorities drafted a Memorandum of Understanding (MoU) to set out a joint working framework for waste planning. However there was no agreement on the pooling of existing capacity and apportionment targets as the basis for this joint working. Wandsworth, along with Kensington & Chelsea and Lambeth, aimed to plan for waste jointly across the Western Riverside area by pooling capacity and apportionment targets. However, the London Borough of Hammersmith & Fulham (LBHF) and the Old Oak and Park Royal Development Corporation (OPDC) said they are unable to commit to pooling with the Western Riverside WPAs.

5.6 OPDC's stated reason for being unable to commit to pooling apportionment targets was initially the need to wait until further work on the capacity of the Powerday facility was completed before making a decision on pooling. Subsequently the justification was a need to understand the implications of the revised borough apportionments targets in the new draft London Plan. Wandsworth has not been provided with an update on either of these pieces of work and is not aware of any change in LBHF's or OPDC's position on pooling.

5.7 The London Boroughs of Wandsworth and Lambeth and the Royal Borough of Kensington & Chelsea were keen to working jointly with the Western Riverside authorities to plan for waste and indeed asked for the GLA's help in brokering a deal, but no assistance was forthcoming. Wandsworth cannot force LBHF or OPDC to co-operate on joint waste planning. Therefore Wandsworth, as well as Lambeth and Kensington & Chelsea, are obliged to plan for waste independently of the other Western Riverside authorities.

5.8 It should be noted that the London Plan states that "*Existing waste sites should be safeguarded and retained in waste management use*" (policy SI9) and that "*Boroughs with a surplus of waste sites should offer to share these sites with those boroughs facing a shortfall in capacity before considering site release*" (9.8.6). However, it is not clear how this has been applied to the ODPC's Local Plan which is not safeguarding the EMR site within the LBHF boundary. If it was safeguarded, EMR's capacity could be used to meet Wandsworth's capacity gap.

5.9 In summary, there is no opportunity to work collectively with the Western Riverside authorities to pool apportionment targets and plan for waste collectively because OPDC do not agree to do so.

6. Opportunities to use surplus capacity elsewhere in London

6.1 The supporting text of London Plan Policy SI8 states that "*Boroughs with a surplus of waste sites should offer to share these sites with those boroughs facing a shortfall in capacity before considering site release*" (9.8.6).

6.2 Boroughs, or groups of boroughs planning collectively for waste, are able to identify a surplus of capacity through an up-to-date waste data study which supports a new Waste Plan or the review of a Local Plan containing a strategic waste policy. The stage of plan preparation for each Borough, or group of Boroughs, is summarised in Table 3 below.

6.3 Most Boroughs, or groups of Boroughs, already have adopted waste plans/policies or are at an advanced stage (examination or preparing for adoption) of their Waste Plan/Local Plan development process. These Boroughs are therefore not in a position to consider a request from Wandsworth to help with the shortfall of capacity for apportioned waste.

- 6.4 Where Boroughs, or groups of Boroughs, are preparing or about to prepare a new Waste Plan or Local Plan waste policies, Wandsworth has looked in detail at whether there is an opportunity to request help with meeting its apportionment targets using surplus capacity.
- 6.5 The East London Boroughs have prepared a joint Waste Data Study but this is not yet published. The East London Boroughs do not yet have an agreement / MoU in place to work jointly on a new East London Waste Plan and will consider this after the elections in May 2022. The East London Boroughs are therefore not currently in a position to consider a request from Wandsworth to help meet the borough's apportionment target. This position is reflected in a Statements of Common Ground between Wandsworth and Havering.
- 6.6 Bexley submitted its draft Local Plan to the Secretary of State in November 2021 for independent examination. The draft Local Plan is supported by a Waste Technical Paper which identifies a surplus capacity of 257,625 tonnes by 2041 from existing facilities. There is also an additional 745,000 tonnes of pipeline capacity which may be developed as part of Cory's granted CDO application for a new EfW facility in Bexley.
- 6.7 Bexley plans for waste as part of the South East London Joint Waste Planning Group (SELJWPG) along with London boroughs of Bromley, Lewisham, Greenwich, Southwark and the City of London. Bexley has formally accepted responsibility for meeting the waste management capacity for London Plan waste apportionment requirements identified for the City of London and City of Westminster. All the SE London Boroughs in the group, not just Bexley, would need to agree a similar approach to Wandsworth's apportionment capacity gap.
- 6.8 However, due to the timing of Bexley's Local Plan examination, SELJWPG is not currently in a position to consider a request from Wandsworth to help meet the Borough's apportionment target. This position is reflected in a Statement of Common Ground (SoCG) between Wandsworth and Bexley. The SoCG goes on to say that where monitoring demonstrates that waste management capacity to meet Wandsworth's apportionment target is unlikely to be achieved by 2026, Wandsworth may seek help from SELJWPG to meet the apportionment target.
- 6.9 Finally, the West London Boroughs have not yet prepared a Waste Data Study and so are not in a position to identify if there is any surplus capacity in the area.
- 6.10 In summary, no Boroughs are currently in a position where they have surplus capacity and are at a stage in their Plan-making process to offer surplus capacity to Wandsworth. This position may change after Bexley's Local Plan examination and as the East London Boroughs begin the process of reviewing the East London Waste Plan.

Appendix A: Waste Plan / Local Plan stage for each London Borough

Waste Plan	Borough	Stage of Waste Plan / waste policies
East London Waste Plan	Barking & Dagenham	Waste Data Study completed but not published. Review of the East London Waste Plan (ELWP) to be considered after the May 2022 elections.
	Havering	
	Newham	
	Redbridge	
LBH&F / WLWP	Old Oak Common & Park Royal Development Corporation (OPDC)	Surplus capacity not safeguarded
North London Waste Plan	Barnet	Adoption by boroughs
	Camden	
	Enfield	
	Hackney	
	Haringey	
	Islington	
	Waltham Forest	
NLWP / Tower Hamlets	London Legacy Development Corporation (LLDC)	See NLWP and Tower Hamlets
South London Waste Plan	Croydon	Main Modifications
	Kingston	
	Merton	
	Sutton	
Unitary	Hammersmith & Fulham	Local Plan adopted
Unitary	Kensington & Chelsea	Consultation on Reg 18 Local Plan
Unitary	Lambeth	Local Plan adopted
Unitary	Tower Hamlets	Local Plan adopted
Unitary	Westminster	Local Plan adopted
Unitary (SELJWPG)	Bexley	Local Plan examination
Unitary (SELJWPG)	Bromley	Local Plan adopted (SELJWPG Waste Data Study shows surplus capacity in Bexley)
Unitary (SELJWPG)	City of London	City Plan Review underway (SELJWPG Waste Data Study shows surplus capacity in Bexley)
Unitary (SELJWPG)	Greenwich	Local Plan Review underway (SELJWPG Waste Data Study shows surplus capacity in Bexley)
Unitary (SELJWPG)	Lewisham	New Local Plan underway (SELJWPG Waste Data Study shows surplus capacity in Bexley)
Unitary (SELJWPG)	Southwark	Adoption

Waste Plan	Borough	Stage of Waste Plan / waste policies
		(SELJWPG Waste Data Study shows surplus capacity in Bexley)
West London Waste Plan	Brent	Update of WLWP due, no Waste Data Study prepared
	Ealing	
	Harrow	
	Hillingdon	
	Hounslow	
	Richmond	