

WANDSWORTH LOCAL PLAN HEARING STATEMENT

INTRODUCTION

This statement has been prepared on behalf of our client, the Western Riverside Waste Authority (WRWA).

The WRWA was established in 1986 as an autonomous statutory local government body to undertake the waste disposal functions prescribed by the Local Government Act 1985 and the Waste Regulations and Disposal (Authorities) Order 1985. The WRWA is responsible for managing the waste collected in the London Boroughs of Hammersmith and Fulham, Lambeth, Wandsworth and the Royal Borough of Kensington and Chelsea.

The WRWA is responsible for the reuse, recycling and recovery of energy from around 400,000 tonnes per annum of municipal waste collected by its constituent councils. The WRWA minimises the impact of this essential public service by utilising its riparian transfer stations to transport the residual waste (that which cannot be reused or recycled) by river for treatment which removes around 100,000 HGV movements a year from London's congested roads.

The WRWA own two waste transfer stations, one at Cringle Dock, Battersea and the other at Smugglers Way, Wandsworth. The Smugglers Way site also incorporates an 84,000 tonne per year Materials Recycling Facility and a 20,000 tonne per year Household Waste and Recycling Centre (HWRC). Both sites are currently operated by Cory Environmental Ltd trading as Cory. Both of the sites are 'safeguarded wharves' within the current Wandsworth Development Plan. Cringle Dock is allocated for residential-led mixed use development above, within the Wandsworth Site Specific Allocations Document (adopted March 2016).

Representations have been submitted to Wandsworth Borough Council (the 'Council') by Carter Jonas, on behalf of the WRWA, at every consultation opportunity associated with the Local Plan. Since the submission of representations at Regulation 19 stage, the WRWA has been in discussions with the Council's planning policy team in relation to Policy LP13 'Circular Economy, Recycling and Waste Management', Site Allocation WT9 (Feather's Wharf), Site Allocation WT11 (Western Riverside Waste Transfer Station) (WRWTS), Site Allocation NE9 (Kirtling Wharf), Site Allocation NE11 (Cringle Dock) and Policy PM9 (Nine Elms).

A Statement of Common Ground (Examination Document Reference: WBC-004) has been agreed between the WRWA and the Council and this seeks to establish areas of agreement and also proposes minor changes to the Submission Local Plan prior to the public examination.

The WRWA will be attending hearing sessions in relation to the following matters:

- Main Matter 3 (Wandsworth Town)
- Main Matter 4 (Nine Elms)
- Main Matter 14 (Tackling Climate Change)

This statement outlines the WRWA comments in respect of Main Matter 14.

MAIN MATTER 14 – TACKLING CLIMATE CHANGE (POLICIES LP10- LP14)

Policy LP13 (Circular Economy, Recycling and Waste Management) – Does the policy provide certainty regarding committing to future capacity?

The WRWA supports Policy LP13 which seeks to safeguard existing waste sites and identify new sites in the borough which contribute to London's recycling and waste capacity, in particular the potential given to the consolidation of waste sites.

Part F of the draft policy highlights the Council's intention to increase waste capacity within the borough, although it is acknowledged in Appendix 5 of its Consultation Statement that no sites were put forward to meet the identified need.

The WRWA has two points to make on this. First, it is not clear in the Submission Local Plan that the supporting evidence base has given sufficient consideration to the requirements of the Environment Act 2021, with the inevitable consequence that the quantitative and qualitative shortfall in current facilities to meet the identified need is under-estimated, let alone the ability of these facilities to meet future needs.

Second, there are clear opportunities to improve and enhance existing facilities within the borough that can help meet this need, however this is going to require changes to draft allocations WT9, NE9 and NE11, and the Council will have to play a lead role in facilitating the delivery of the facilities through the plan-making and decision-making process on applications. The WRWA's specific comments on the draft allocations is set out in the Hearing Statements prepared by Carter Jonas for Matters 3 and 4.

Discussions have taken place with the Council's planning policy team, and the future implications of the Environment Act 2021 were acknowledged by officers as part of those discussions. Within the Statement of Common Ground, revised wording of Paragraph 4.89 has been agreed between the WRWA and the Council in relation to Feather's Wharf to include the following wording to reflect those discussions: *"Due to the new requirements for waste management set out in the Environment Act 2021, the Council will work with the WRWA and consider any potential opportunity to plan for waste management on WT9 Feather's Wharf in accordance with any future plan for the WRWA"*.

In summary, the WRWA supports Policy LP13 but considers that further certainty regarding committing to future capacity could be provided if the WRWA's suggested changes to WT9, NE9 and NE11 are agreed to, and consequently implemented.