OPDC
OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION

Waste Strategy

LOCAL PLAN SUPPORTING STUDY

Draft for Regulation 18 Consultation
4 February 2016

Role of this study

This study has been produced to inform the draft Local Plan and should be read alongside other relevant studies, the draft Local Plan and the London Plan.

Study overview

Document title	**Waste Strategy**
Lead author	OPDC
Purpose of the study	To demonstrate how OPDC can help the three host local authorities meet their waste apportionment targets, in accordance with paragraph 5.80 of the Mayor's London Plan
Stage of production	Draft completed to inform Regulation 18 version of the Local Plan
Key outputs	■ Identifies existing waste sites in the OPDC area. ■ Identifies OPDC's adoption of the West London Waste Plan, which deals with apportionment targets for the London Boroughs of Brent and Ealing. ■ Identifies ability of sites in the Old Oak to meet the London Borough of Hammersmith and Fulham's apportionment
Key recommendations	■ The Powerday waste site should be safeguarded to meet the London borough of Hammersmith and Fulham's waste apportionment. ■ The Local Plan should promote energy from waste to ensure that waste treated in the OPDC area is recycled within the area ■ OPDC should support the relocation of waste operators on sites not being safeguarded.
Relations to other studies	Outputs cross-relate to the Decentralised energy strategy and will inform OPDC's Utilities and Infrastructure Strategy
Next steps	The Strategy is in draft and is available for comment. Necessary revisions will be made following public consultation before the document is finalised to sit alongside the Regulation 19 consultation on the Local Plan

Consultation questions

1. Do you agree with the recommendations of this supporting study? If not, please explain why.

2. Do you agree with the methods used in delivering the recommendations? If not, please set out alternative approaches and why these should be used.

3. Are there any other elements which the supporting study should address? If yes, please define these.

You can provide comments directly through:

opdc.commonplace.is

Old Oak and Park Royal Development Corporation (OPDC) Waste Strategy

1. Purpose of this strategy

1.1 The OPDC Waste Strategy has been produced to sit as an evidence paper behind OPDC's Local Plan. The paper sets out OPDC's approach to supporting boroughs to meet their waste apportionment targets, as required in paragraph 5.80 of the Mayor's London Plan (2015). This Waste Strategy should be read in conjunction with Policy EU4 of the draft Local Plan.

2. Context

a) Background to OPDC

2.1 On April 1st 2015, the Mayor of London established OPDC. On this date, OPDC became the local planning authority for the area, taking on planning functions normally available to a London borough, including plan making powers and determination of planning applications. OPDC also has powers to be the Community Infrastructure Levy (CIL) setting and charging authority.

2.2 In becoming a local planning authority, OPDC has subsumed the planning functions of the London Boroughs of Brent, Ealing and Hammersmith and Fulham for the land within its area (figure 1).

Figure 1: Old Oak and Park Royal Development Corporation (OPDC) Boundary

2.3 OPDC has been established to realise the substantial potential for redevelopment and regeneration resulting from the planned Old Oak Common station, which provides interchange between High Speed 2 (HS2) and Crossrail – the UK's largest transport infrastructure projects. Old Oak Common station will provide the area with unrivalled public transport accessibility, with access to Birmingham (35 minutes) and London Euston (5 minutes) via HS2 and Heathrow (10 minutes) and Central London (10 minutes) via Crossrail. OPDC's purpose is to use the once-in-a-lifetime opportunity of investment in HS2 and Crossrail to develop an exemplar community and new centre in north-west London, delivering over 24,000 homes and 55,000 jobs in the vicinity of the Old Oak Common station, creating opportunities for local people and driving innovation and growth in London and the UK.

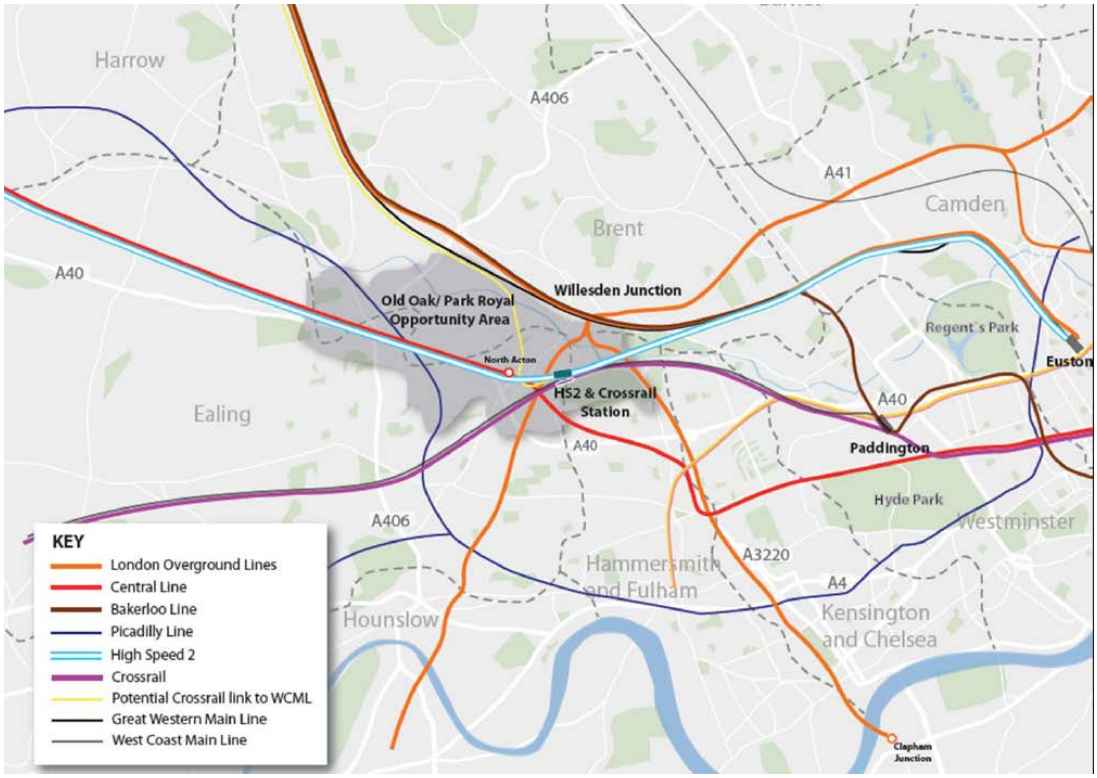

Figure 2: OPDC context

b) <u>Waste site and capacity context</u>

2.4 Figure 3 identifies the existing waste sites within the OPDC area. Two of the waste sites are within the London Boroughs of Ealing and Brent. These sites fall within the coverage of the West London Waste Plan (WLWP), which is a Joint Waste Plan for the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames. The WLWP was adopted by OPDC in July 2015. The other five waste sites are within the London Borough of Hammersmith and Fulham, who are part of the Western Riverside Waste Authority (WRWA) which covers the London Boroughs of Hammersmith and Fulham, Wandsworth and Lambeth and the Royal Borough of Kensington and Chelsea. The table below provides further details on each of the sites including the local authority they are within, the size of the site and details regarding its use.

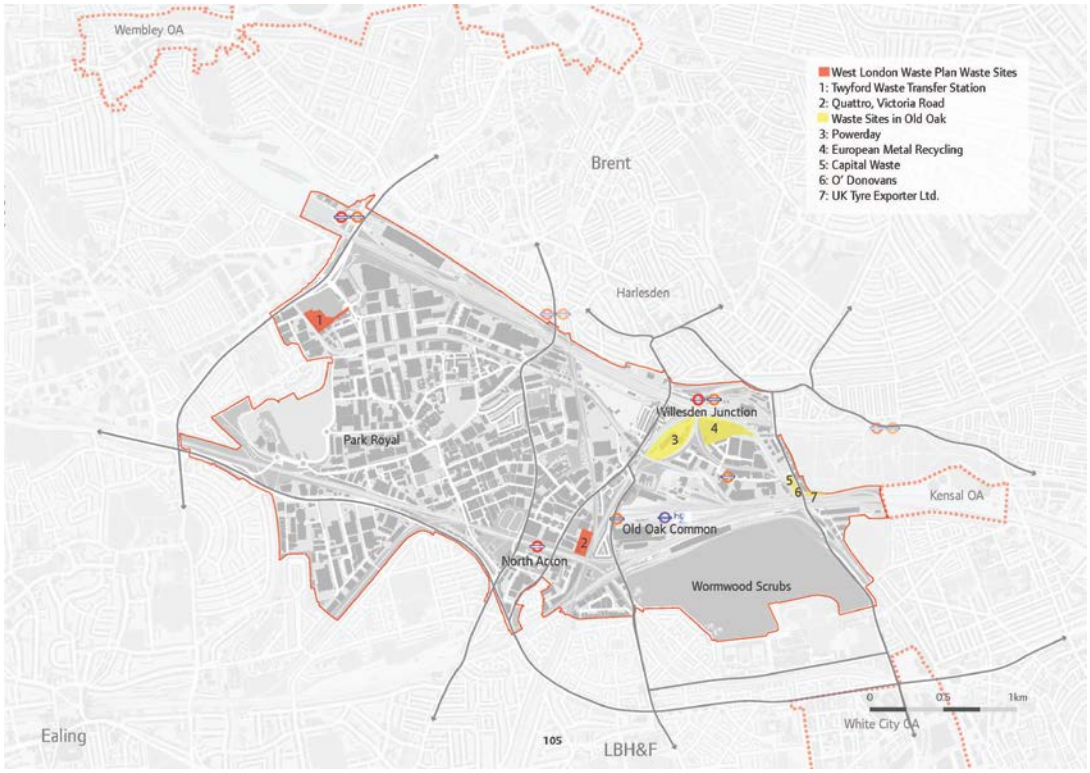

Figure 3: Waste sites within OPDC

Site no.	Name	Borough	Hectares	Notes
1	Twyford Waste Transfer Station	Brent	1.24	Waste transfer station
2	Quattro, Victoria Road	Ealing	0.7	Waste transfer station. Safeguarded under the HS2 Safeguarding Direction. If HS2 proceeds it will only become available from 2024 for waste management uses
3	Powerday	Hammersmith and Fulham	3.9	Predominantly deals with construction and demolition waste. Some municipal, commercial and industrial waste
4	European Metal Recycling	Hammersmith and Fulham	4.4	Metals reclamation, primarily scrap cars and fridges
5	Capital Waste Ltd	Hammersmith and Fulham	0.26	Scrap metal storage and transfer station
6	O'Donovan Waste Disposal Ltd	Hammersmith and Fulham	0.27	Waste storage and transfer station
7	UK Tyre Exporters Ltd	Hammersmith and Fulham	0.32	Tyre storage and transfer station

c) Waste policy context

European

2.5 The Waste Framework Directive (2008/98/EC) provides an overarching legislative framework for the management of waste across Europe. Its transposition in England is now largely through the Waste (England and Wales) Regulations 2011.

National

2.6 The National Planning Policy Framework (NPPF) does not contain specific policies on waste, but Councils "preparing waste plans and taking decisions on waste applications should have regard to policies in [the] Framework so far as relevant" (paragraph 5).

2.7 Paragraph 156 of the NPPF states that Councils should set out the "strategic priorities" for their area in the Local Plan, which includes delivering "waste management" infrastructure (see also paragraph 162).

2.8 The National Planning Policy for Waste (NPPW) provides further detailed policy on waste and the National Planning Practice Guidance (NPPG) on Waste states that "WPAs should have regard to the apportionments set out in the London Plan when developing their policies. The Local Waste Plan will need to be in general conformity with the London Plan"

Regional

2.9 The Mayor's London Plan (2015) provides the relevant policy context for how OPDC must deal with waste within its area.

2.10 The London Plan (2015) sets out projections of how much municipal waste and commercial and industrial waste is likely to be generated in the capital over the next 20 years. Each local authority has been apportioned an amount of London's waste that it is required to positively plan for and manage. Local Plans should identify land and waste management facilities for the management of this apportioned waste (Policy 5.17 and Table 5.3).

2.11 OPDC has not been allocated a waste apportionment target in the London Plan (2015) but paragraph 5.80 states '*where a Mayoral Development Corporation (MDC) exists or is established in a borough the MDC will cooperate with the Borough to ensure that the Borough's apportionment requirements are met*'.

2.12 The London Plan (2015) revised waste allocation figures that had been included in the London Plan (2011). The table below outlines these revisions in relation to the three London Boroughs of Brent, Ealing and Hammersmith, in which OPDC sits. The table shows that the apportionment figures have been substantially revised in the new London Plan (2015) and apportionment targets in the three local authorities are substantially lower in 2036 in the London Plan (2015) compared to in 2031 in the London Plan (2011).

	Apportionment Target	Brent (tonnes)	Ealing (tonnes)	Hammersmith and Fulham (tonnes)
	2011	249,000	315,000	216,000

London Plan (2011)	2016	284,000	359,000	246,000
	2021	320,000	405,000	278,000
	2026	359,000	455,000	312,000
	2031	400,000	507,000	348,000
London Plan (2015)	2016	195,000	252,000	172,000
	2021	225,000	291,000	199,000
	2026	270,000	349,000	238,000
	2031	275,000	355,000	242,000
	2036	280,000	362,000	247,000

3. Waste Strategy

3.1 The policy context above notes that the London Plan requires OPDC to work collaboratively to ensure that boroughs' apportionment requirements are met. The below strategy outlines how OPDC propose to ensure that the apportionment targets for the London Boroughs of Brent, Ealing and Hammersmith and Fulham are adequately planned for through OPDC's Development Plan.

3.2 The OPDC area sits partly within the West London Waste Authority (WLWA) and partially within the Western Riverside Waste Authority (WRWA) (see Figure 4). OPDC's approach to waste apportionment within the WLWA is set out from para 3.3 below. OPDC's approach to working with Hammersmith and Fulham and the wider WRWA area is set out from para 3.10 onwards. Para 3.29 onwards also sets out the joint working that OPDC has been undertaking with the WRWA waste planning authorities (WPAs), in accordance with the duty to cooperate.

Figure 4: Waste authority areas in London (OPDC area in red)

a) Approach in London Boroughs of Brent and Ealing

3.3 The London Boroughs of Brent and Ealing fall within the West London Waste Authority (WLWA). The WLWA covers six local authorities in West London:

- Brent;

- Ealing;
- Harrow
- Hillingdon;
- Hounslow; and
- Richmond.

3.4 These six local authorities agreed to work together to produce a waste plan, known as the West London Waste Plan (WLWP) to show how they will meet their waste apportionment allocated through the Mayor's London Plan. The WLWP was produced in advance of the production of the London Plan (2015) and it therefore sets out how the local authorities will deal with the waste apportionment set out in the London Plan (2011). The WLWP:

- details the estimated amounts for the different types of waste that will be produced in West London up to 2031;

- identifies and protects the current sites to help deal with that waste;

- identifies the shortfall of capacity needed over the life of the WLWP (to 2031); and

- proposes a set of sites to meet the shortfall which are preferred for waste related development.

3.5 The WLWP was produced and went through examination prior to the establishment of OPDC in April 2015. The WLWP was considered by the Planning Inspectorate to adequately set out how the West London Waste Authority (WLWA) would deal with its waste requirements for the plan period up to 2031, in accordance with the London Plan (2011). As identified above, the new London Plan (2015) reduces the waste apportionment for the London Boroughs of Brent and Ealing and the WLWP comfortably deals with the waste apportionment needs for these revised figures.

3.6 Upon the establishment of OPDC, amendments were made to the plan, in agreement with the Planning Inspectorate, to make reference to OPDC and to make reference to OPDC being party to the WLWP.

3.7 In July 2015, OPDC adopted the WLWP as a Development Plan Document (DPD). This commits OPDC to safeguard the waste sites identified in the WLWP that fall within the OPDC area, which are set out in figure 3 as being:
- Twyford Waste Transfer Station; and
- Quattro, Victoria Road.

3.8 In addition to OPDC, the six local authorities have also adopted the WLWP as part of their Development Plan.

3.9 In light of the above, through the adoption of the WLWP, OPDC considers that it has satisfied the requirements of London Plan (2015) paragraph 5.80 to ensure that the apportionment requirements are met in respect of the London Boroughs of Brent and Ealing.

b) Approach in London Borough of Hammersmith and Fulham

3.10 As set out in section 2b above, there are 5 waste sites within the London Borough of Hammersmith and Fulham that fall within the OPDC area. Officers from OPDC have held discussions with officers from the London Borough of Hammersmith and Fulham and understand that there are not considered to be any other sites within the borough that can be considered to help deal with the borough's apportionment targets at this stage. Para 5.80 of the Mayor's London Plan sets out the requirement for OPDC to cooperate with Hammersmith and Fulham, to ensure that the Borough's apportionment requirements are met. Within the OPDC area there are currently five waste sites within Hammersmith and Fulham. These are:

Hammersmith and Fulham Waste sites	**Hectares**
Powerday	3.9
European Metal Recycling	4.4
Capital Waste Ltd	0.26
O'Donovan Waste Disposal Ltd	0.27
UK Tyre Exporters Ltd	0.32

3.11 The London Borough of Hammersmith and Fulham is not part of a joint Waste Plan grouping. Instead, its Core Strategy (2011) provide the strategic waste policy and safeguards both the Powerday and EMR waste sites in order to meet the borough's waste apportionment target in the Mayor's London Plan (2011). The Further Alterations to the London Plan (FALP) reviewed these figures down and consequently, the London Borough of Hammersmith and Fulham's Local Plan (2015) (Regulation 18 consultation) identifies that the London Borough of Hammersmith and Fulham's waste apportionment can be met entirely by the Powerday (Old Oak Sidings) waste site. This argument is explored further in the proceeding paragraphs.

3.12 The GLA has produced an Opportunity Area Planning Framework (OAPF) for Old Oak and Park Royal, which was published by the Mayor of London in November 2015. The OAPF covers a 30 year period, extending beyond OPDC's Local Plan period. In the Environment Chapter, the OAPF explains that for development to proceed within the Old Oak Common Opportunity Area, it will be necessary to relocate one or more of the waste sites and that in particular, the early relocation of the European Metal Recycling (EMR) waste site is considered necessary to facilitate the early regeneration of the north part of the Opportunity Area. The OAPF also notes that the Powerday waste site, a relatively new facility built in 2006 which predominantly deals with construction waste, could act the on-site construction waste management centre for the redevelopment of the Old Oak Common Opportunity Area and could be refurbished over the lifetime of the development so that its focus could switch to municipal waste management and district-scale energy generation.

3.13 The Powerday waste site (Figure 5) covers 3.9 hectares and has a licensed capacity to manage 1.6m tonnes per annum. The table below shows throughput data from the Environment Agency (EA) for the Powerday waste site over the past 4 years.

Year	Construction waste (tonnes)	Municipal solid waste (MSW) and commercial and industrial (C+I) waste (tonnes)	Total (tonnes)	Municipal and C+I (%)
2011	266,103	139,102	405,205	34.3
2012	210,593	145,338	355,931	40.8
2013	268,288	91,355	359,643	25.4
2014	198,894	147,428	346,322	42.6
Total	943,878	523,223	1,467,101	35.7

Figure 5: Photo of Powerday waste site

3.14 Over the past four years, an average of 35.7% of waste throughput at the Powerday waste site was for municipal or commercial and industrial waste, which can count towards meeting the London Borough of Hammersmith and Fulham's apportionment target. As noted, the Powerday waste site has a licensed capacity to treat up to 1.6m tonnes of waste per annum and its MSW/CI throughput is current operating at approximately 1/3 of the facility's total licensed capacity.

3.15 OPDC understands through meetings with Powerday that this is partially a result of the market and partly a result of conditions on the planning applications, which require 1/3 (533,000 tonnes) of the licensed waste capacity to be transferred to and from the site by rail and 1/3 of the licensed waste capacity to be transferred to and from the site by canal. Powerday has a rail head and canal dock but does not currently utilise these. Powerday have confirmed that were supply-side markets and demand-side markets to propose to deliver and/or remove waste via canal or rail, Powerday would be able to use these and could potentially increase the throughput capacity on the site. Assuming that approximately 35.7% of waste were to be municipal or commercial and industrial waste, this would mean that Powerday's throughput of municipal or commercial and industrial waste would be approximately 571,200 tonnes per annum. To support Powerday in achieving its full licensed capacity and ensure LBHF's apportionment is met, OPDC will work closely with

Powerday to explore ways it can be assisted to expand its markets. This includes the potential to reuse and recycle more waste and generate energy from waste (see paragraph 3.21 below).

3.16 The table below sets out the apportionment targets for Hammersmith and Fulham in the Mayor's London Plan 2015 and the throughput capacity of the Powerday waste site would be capable of fully meeting (and exceeding) this apportionment.

	2016	**2021**	**2026**	**2031**	**2036**
Hammersmith and Fulham apportionment target in the London Plan (2015) (tonnes)	172,000	199,000	238,000	242,000	247,000

3.17 London Plan policy 5.17 requires local authorities to also allocate land to meeting the tonnage of waste apportioned. In discussions with the London Plan team, a figure of 80,000 tonnes per hectare was identified as an appropriate measure for the amount of land that should be allocated. The West London Waste Plan assumed 65,000 tonnes per hectare, so for completeness, both measures have been assessed.

3.18 The table below sets out the required land to meet the London Borough of Hammersmith and Fulham's apportionment in 2036.

	80,000 tonnes per annum (Greater London Authority recommendation)	65,000 tonnes per annum (figure in the WLWP)
Required land in 2036	3.1 hectares	3.8

3.19 At 3.9 hectares, the Powerday waste site exceeds the required land allocation in both instances.

3.20 The Powerday waste site meets the London Borough of Hammersmith and Fulham's apportionment requirements and land requirements; and has locational advantages in terms of its access to sustainable transport modes (a railhead and the canal). As such, and in accordance with Policy 5.17 and Table 5.4 of the London Plan (2015), OPDC's draft Local Plan Policy EU4 therefore proposes to safeguard this waste site for the lifetime of the Local Plan.

c) <u>Other considerations</u>

Waste self-sufficiency

3.21 London Plan policy 5.16 seeks to manage as much of London's waste within London as practicable, working towards managing the equivalent of 100% of London's waste within London by 2026. Part (f) of the policy expands on this by stating that this will in part be achieved by improving London's net self-sufficiency through reducing the proportion of waste exported from the capital over time. This approach accords with Article 16 of the EU Waste Framework Directive (2008/98/EC).

3.22 OPDC has adopted the West London Waste Plan, which for the OPDC area within the London Boroughs of Brent and Ealing, sets out a strategy for contributing towards net self-sufficiency in waste in London by 2026. For the part of the OPDC area within the London Borough of Hammersmith and Fulham (LBHF), the table below provides details from the Environment Agency showing where Powerday's waste has been exported to over the last four years. The Powerday waste site currently exports a significant proportion of its materials outside of London. However, it should be noted that year on year, there has been a significant increase in the proportion of Powerday's waste being exported to elsewhere in London. Further work is required with the Environment Agency to identify which of these materials are being recycled and which are going to landfill or incineration.

Table: Powerday waste destinations by year and tonnage

Destination	**Tonnage**			
	2011/12	**2012/13**	**2013/14**	**2014/15**
Bedfordshire	59	59	0	0
Berkshire	78787	42695	45347	43399
Buckinghamshire	13392	13392	0	0
Cambridgeshire	890	890	0	0
Dartford	6.9	6.9	0	0
Greater London	4966	48331	111008	180178
Hertfordshire	5427	5401	0	0
Lincolnshire	463	329	0	0
South East	279158	449147	169976	25.8
Wiltshire	792	790	0	0
Worcestershire	48	48	0	0

3.23 The National Planning Policy for Waste (NPPW) requires waste planning authorities (WPAs) to consider opportunities for on-site management of waste where it arises. Policy EU5 (Circular economy and resource efficiency) of the draft Local Plan promotes the circular economy and on-site waste management and Policy EU6 (decentralised energy) supports the delivery of infrastructure for on-site energy generation and distribution. Together, these policies would support the use of waste from the Powerday site to generate energy within the OPDC area, in accordance with Policy 5.16 of the Mayor's London Plan. OPDC has been in discussions with Powerday, who have confirmed interest in the potential for generating energy from waste on their site.

Approach to other waste sites in Old Oak Common

3.24 As identified in paragraphs 3.19-3.20, the Powerday waste site meets LBHF's apportionment requirements and is proposed to be safeguarded for the Local Plan period to 2037. There are four other waste sites in the OPDC area and the approach to each is outlined below.

3.25 The European Metal Recycling (EMR) waste site is the largest waste site in the OPDC area. It covers approximately 4.4 hectares and manages a significant quantum of waste, of which a large proportion is municipal and commercial and

industrial, as set out in the table below. Although the site is larger by area than the Powerday site (4.4ha compared to 3.9), it had a lower total throughput of waste (over same time period) than the Powerday site (683,320 tonnes compared to 943,878 tonnes).

Year	Total (tonnes)	Municipal and commercial and industrial (C+I) waste (tonnes)	Other waste (tonnes)	Municipal and C+I (%)
2011	250,985	231,985	18,407	92.4
2012	194,393	169,318	25,074	87.1
2013	123,393	92,573	30,629	75.0
2014	114,549	86,712	27,837	75.7
Total	683,320	580,588	101,947	85.0

3.26 As noted in paragraph 3.11, the Old Oak and Park Royal OAPF identifies the need for the early relocation of this site to facilitate the regeneration of the area. There are three key reasons for this:

i. The site currently generates significant amounts of dust and noise and would not be an appropriate neighbour for developments to the south. The presence of the site therefore sterilises a significant proportion of the Old Oak North 'place' (see chapter 4 of the draft Local Plan) from coming forward for development, if it remains;
ii. The site is close to Willesden Junction station and there are therefore opportunities for significant densities to be realised on the site to deliver new homes and jobs. The Development Capacity Study (DCS), which sits as an additional supporting study to the draft Local Plan, identifies the EMR site as being appropriate for 'high' densities of approximately 550 units per hectare; and
iii. The EMR site, by virtue of its proximity to Willesden Junction, is important for realising the development potential of the Old Oak North 'place' (see chapter 4 of the draft Local Plan). The site is required to deliver a new bridge into Old Oak North from Willesden Junction station, which is required to improve access into the area, increase public transport access and as a consequence, optimise the area's development potential.

3.27 In light of the above and in light of the Powerday site satisfying the London Borough of Hammersmith and Fulham's apportionment needs, OPDC does not propose to safeguard the EMR waste site. Policy EU4 of the draft Local Plan states that OPDC will work with operators in Old Oak to coordinate their relocation to other suitable and accessible sites. Paragraph 5.20 of the Old Oak and Park Royal OAPF states that in considering the relocation of businesses from Old Oak, a sequential process should be applied. This approach should be taken with any relocation of the EMR waste site and paragraph 5.20 of the OAPF identifies the following as the sequential order for finding suitable alternative sites:

1. the OAPF area (OPDC area);
2. West London sub-region;
3. Greater London; and
4. South East of England.

3.28 There are three other waste sites in the Old Oak Common area, which are all situated on Scrubs Lane. These are:

- Capital Waste Ltd: 0.26ha site located to the west of Scrubs Lane, north of the entrance to the EMR and Powerday waste sites. The site operates as a metal recycling centre;
- O'Donovan Waste Disposal Ltd: 0.27ha site located to the west of Scrubs Lane, south of the entrance to the EMR and Powerday waste sites. The site operates as a material recycling facility; and
- UK Tyre Exporters Ltd: 0.32ha site located to the east of Scrubs Lane adjacent to the Grand Union Canal. The site is used for the storage and transfer of tyres.

3.29 OPDC has been unable to source data on the waste material movements into and out of these three sites. Given each of the sites' size, it is anticipated that any waste imports and exports would be significantly smaller than those associated with the Powerday and EMR waste sites. These sites, both individually and collectively, would not fulfil the land required to meet Hammersmith and Fulham's apportionment. As with the EMR site, the sites generate significant amounts of dust and noise and would not be appropriate neighbours for more mixed use or residential-led developments. Similarly to the EMR sites, these three waste sites can make a valued contribution to the OPDC area's homes and jobs targets and the draft Local Plan does not therefore propose to safeguard these sites for waste. As with EMR and in accordance with Policy EU4, OPDC proposes to work with these waste providers to determine the sites' waste throughout and find suitable alternative relocation sites and a sequential approach will be applied to this, in accordance with paragraph 5.20 of the Old Oak and Park Royal OAPF.

Joint working with the Western Riverside Waste Authority (WRWA)

3.30 As noted in 3.2 above, the OPDC area within LBHF falls within the Western Riverside Waste Authority (WRWA) area. Along with OPDC and LBHF, the WRWA area covers the following waste planning authorities (WPAs):

- The Royal Borough of Kensington and Chelsea (RBKC);
- The London Borough of Wandsworth (LBW); and
- The London Borough of Lambeth (LBL)

3.31 In accordance with the duty to cooperate, OPDC has been working closely with these WPAs to provide evidence of the WRWA's capacity to manage joint waste apportionments arising from the revised waste apportionments in the London Plan 2015.