OPDC
OLD OAK AND
PARK ROYAL
DEVELOPMENT
CORPORATION

Waste Apportionment Study

LOCAL PLAN SUPPORTING STUDY

2017

MAYOR OF LONDON

47. Waste Apportionment Study

Document Title	Waste Apportionment Study
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
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 Old Oak Sidings (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 support the delivery of OPDC's strategic district heating network. • OPDC should support the relocation of waste management operators on sites not being safeguarded for apportionment in Old Oak.
Relations to other studies	Informed by outputs from the Waste Technical Paper. Interfaces with the Waste Management Strategy and Utility Study
Relevant Local Plan Policies and Chapters	• Place Policy P2 (Old Oak North) • Environment and Utility policy EU6 (waste

Old Oak and Park Royal Development Corporation (OPDC) Waste Apportionment Study

1. Purpose of this strategy

1.1 The OPDC Waste Apportionment Study 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 Strategy should be read in conjunction with policies in OPDC's Local Plan, particularly Policy EU6.

2. Context

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), Elizabeth Line and National rail. Old Oak Common station will provide the area with unrivalled public transport accessibility, with access to Birmingham (38 minutes) and London Euston (5 minutes) via HS2 and Heathrow (10 minutes) and Central London (10 minutes) via the Elizabeth Line. OPDC's purpose is to use the once-in-a-lifetime opportunity of investment in HS2 and the Elizabeth Line 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.

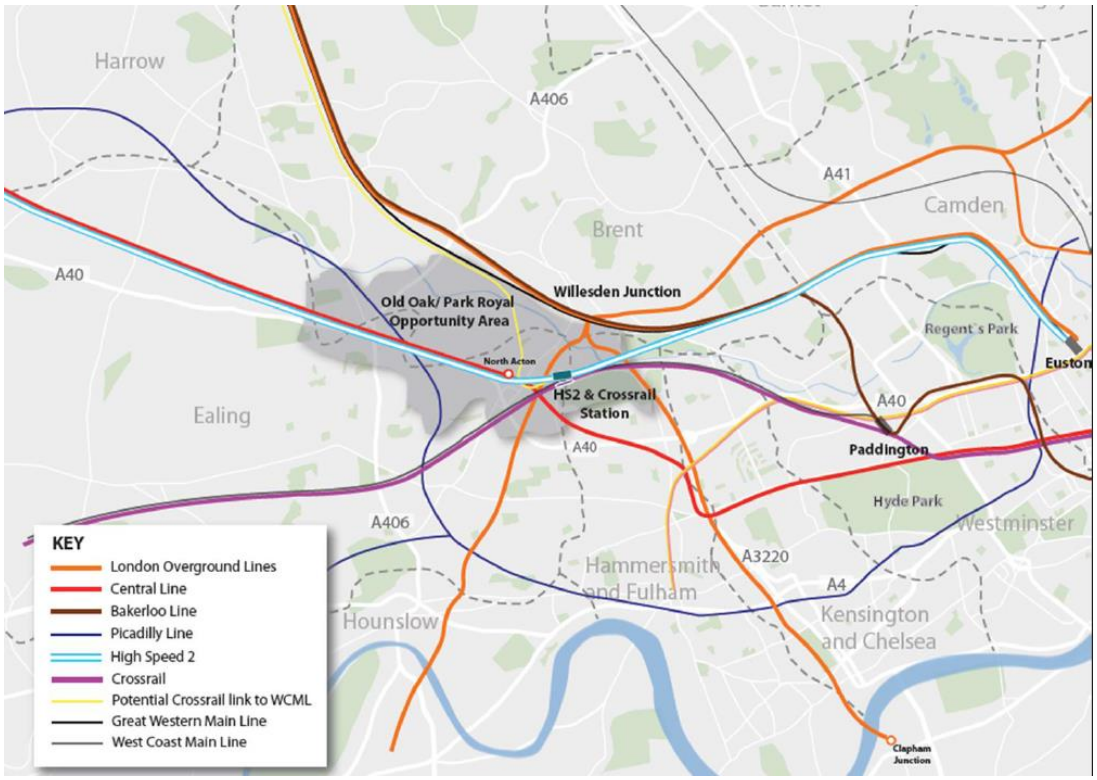

Figure 2: OPDC context

Waste site and capacity context

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.

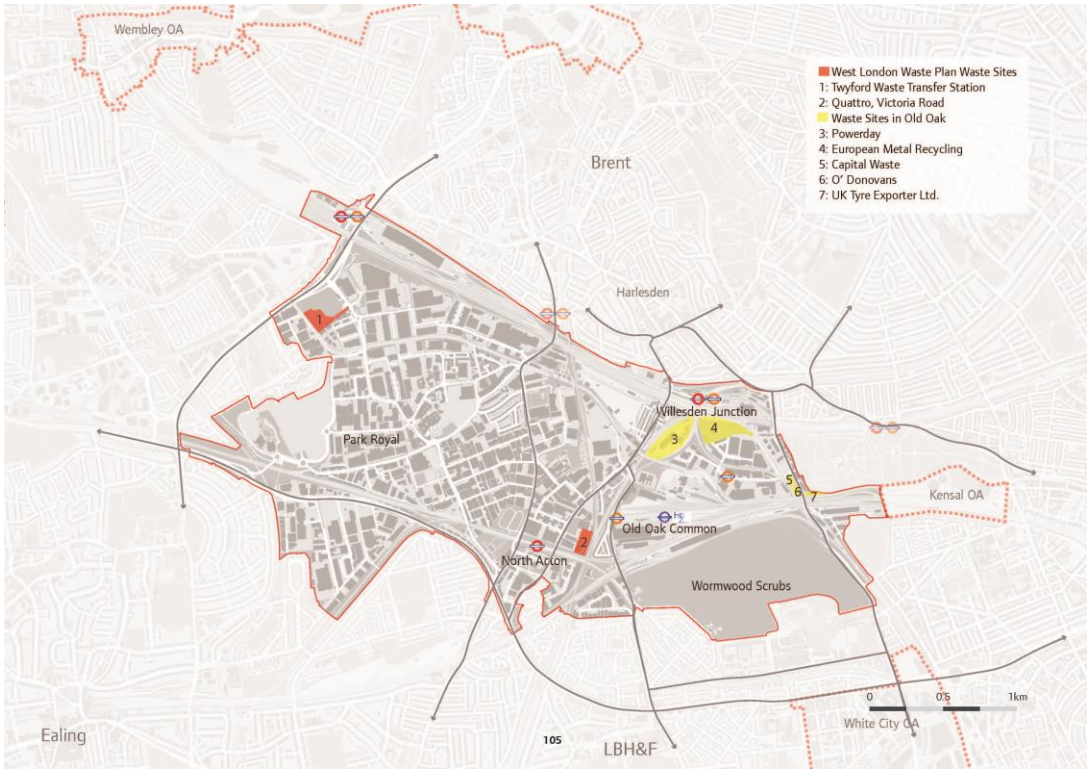

Figure 3: Waste sites within OPDC

Site no.	Name	Site Address	Borough	Hectares	Notes
1	Twyford Waste Transfer Station	Twyford Waste & Recycling Centre, Abbey Road, Brent, NW10 7TJ	Brent	1.24	Waste transfer station
2	Quattro, Victoria Road	Quattro, Victoria Road, Park Royal, Ealing	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 (Old Oak Sidings)	Old Oak Sidings, Off Scrubs Lane, Willesden, London, NW10 6RJ	Hammersmith and Fulham	3.9	Predominantly deals with construction and demolition waste but also some municipal, commercial and industrial waste
4	European Metal Recycling (EMR)	106 Scrubs Lane, Willesden, London, NW10 6QY	Hammersmith and Fulham	4.4	Metals reclamation, primarily scrap cars and fridges
5	Capital Waste Ltd	104, Scrubs Lane, Willesden,	Hammersmith and Fulham	0.26	Scrap metal storage and transfer station

		London			
6	O'Donovan Waste Disposal Ltd	Scrubs Lane	Hammersmith and Fulham	0.27	Waste storage and transfer station
7	UK Tyre Exporters Ltd	108 Scrubs Lane, Willesden, London, NW10 6QY	Hammersmith and Fulham	0.32	Tyre storage and transfer station

Waste policy context

European

2.5 The Waste Framework Directive (2008/98/EC) provides the 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 (2016) provides the relevant policy context for how OPDC must deal with waste within its area.

2.10 The London Plan (2016) sets out projections of how much municipal waste (MSW) and commercial and industrial waste (C&I) 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. As outlined in the Plan, waste is deemed to be managed in London if:

- it is used in London for energy recovery
- it relates to materials sorted or bulked in London facilities for reuse, reprocessing or recycling
- it is materials reused, recycled or reprocessed in London

- it is a 'biomass fuel' as defined in the Renewable Obligation Order.

2.11 In terms of plan preparation, policy 5.17 requires the following:

F Boroughs must allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in this Plan. Boroughs may wish to collaborate by pooling their apportionment requirements.

G Land to manage borough waste apportionments should be brought forward through:

a protecting and facilitating the maximum use of existing waste sites, particularly waste transfer facilities and landfill sites
b identifying sites in strategic industrial locations (see Policy 2.17)
c identifying sites in locally significant employment areas (see Policy 4.4)
d safeguarding wharves (in accordance with policy 7.26) with an existing or future potential for waste management.

H If, for any reason, an existing waste management site is lost to non-waste use, an additional compensatory site provision will be required that normally meets the maximum throughput that the site could have achieved.

2.12 OPDC has not been allocated a waste apportionment target in the London Plan (2016) 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'.*

2.13 The London Plan (2016) revised the waste apportionment 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 reduced in the London Plan (2016) and apportionment targets in the three local authorities are substantially lower in 2036 in the London Plan (2016) compared to in 2031 in the London Plan (2011).

	Apportionment Target	Brent (tonnes)	Ealing (tonnes)	Hammersmith and Fulham (tonnes)
London Plan (2011)	2011	249,000	315,000	216,000
	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	2016	195,000	252,000	172,000
	2021	225,000	291,000	199,000
	2026	270,000	349,000	238,000

(2016)	2031	275,000	355,000	242,000
	2036	280,000	362,000	247,000

2.14 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. Waste Apportionment 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. This paper 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 Local 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.

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

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 (2016) 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 (2016) 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 (2016) paragraph 5.80 to

ensure that the apportionment requirements are met in respect of the London Boroughs of Brent and Ealing.

Approach in London Borough of Hammersmith and Fulham

3.10 Within the OPDC area there are currently five waste sites within Hammersmith and Fulham. These are:

Name	Site Address	Hectares
Powerday	Old Oak Sidings, Off Scrubs Lane, Willesden, London, NW10 6RJ	3.9
European Metal Recycling (EMR)	106 Scrubs Lane, Willesden, London, NW10 6QY	4.4
Capital Waste Ltd	104, Scrubs Lane, Willesden, London	0.26
O'Donovan Waste Disposal Ltd	Scrubs Lane	0.27
UK Tyre Exporters Ltd	108 Scrubs Lane, Willesden, London, NW10 6QY	0.32

3.11 The London Borough of Hammersmith and Fulham is not part of a joint Waste Plan grouping. Instead, its Submission Core Strategy provides the strategic waste policy. The Submission Core Strategy confirms that the Council consider that the Old Oak Sidings (Powerday) site could meet the borough's waste apportionment target set out in the London Plan (2016). On this basis the Council encourages OPDC to safeguard the Powerday.

3.12 The OPDC/LBHF area also sits within the Western Riverside Waste Authority (WRWA) (see Figure 4). OPDC has been working in partnership on a joint Waste Technical Paper with the following WRWA waste planning authorities (WPAs):

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

3.13 OPDC has discharged its duty under Section s33a of the Planning and Compulsory Purchase Act 2004 to co-operate the WRWA boroughs by engaging constructively, actively and on an ongoing basis in the preparation of the Local Plan. OPDC has been involved in the Waste Apportionments Engagement Statement (December 2015), working closely with these WPAs to develop an up-to-date waste evidence base - the WRWA Waste Technical Paper - so each borough can plan for its waste apportionments and arisings. The WRWA Waste Technical Paper is available on OPDC's website but key findings are updated, where relevant, in this report. OPDC and the WRWA boroughs have also recently undertaken a joint waste engagement exercise (May 2017). OPDC will continue to work with the WRWA to consider relevant waste matters, including waste apportionment.

3.14 In line with London Plan policy (5.17F) the proceeding paragraphs set out justifications based on capacity in identified waste management facilities and on land availability.

Capacity in identified waste management facilities

3.15 The Powerday facility at Old Oak Sidings (Figure 5) covers 3.9 hectares and provides the highest amount of capacity within the OPDC/LBHF area. This facility predominantly deals with construction waste, however it has been accepting a proportion of other (i.e. non-construction) C&I wastes. Processes on the site produce a range of recyclates and a Refuse Derived Fuel (RDF).

Figure 15: Photo of Powerday waste site

3.16 The table below shows throughput data from the Environment Agency (EA) for the Powerday waste site over the past 4 years. The Powerday site has a licensed capacity to treat up to 1.6m tonnes of waste per annum; however, the operator has confirmed that the site would be unlikely to be capable of supporting this throughput with could feasibly manage up to 1m tonnes per annum.

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

3.17 Powerday has explained that the variance between the current operational and licensed capacity is not due to operational restrictions on the site. OPDC understands through discussions with Powerday that this is partially a result of restrictions 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. The planning consent

for the site includes a specific condition to restrict the amount of waste imported onto the site by road (546,000 tonnes) which means that any additional waste and other materials would have to be imported by rail or canal.

3.18 The site has an operational rail head and wharf and the current site operator has confirmed that if supply-side and demand-side contracts to deliver and/or remove waste via canal or rail existed, then they would be able to use the canal/rail infrastructure and increase the throughput capacity on the site. With regards to this, it is understood that the operator is actively pursuing commercial opportunities. To support the site to achieve a higher throughput (up to 1 mill tonnes), OPDC will work closely with the site operator to explore ways it can be assisted to expand its markets and optimise the use of the site in order to help meet LBHF's apportionment target. OPDC's Local Plan policies will create and increase the range of opportunities as they support development proposals which maximise the use of rail and water transport (P3, T7, T8) during the construction and operation of development.

3.19 Over the last four years, the proportion of MSW/C&I has averaged 36% of the total throughput of the site, and reached up to 42.6% in 2014. Assuming that 42.6% of waste throughput would continue to be MSW and/or C&I, and the site reaching an operating capacity of 1 million tonnes per annum, which would mean that the site could handle 426,000 tonnes of MSW/C&I waste per annum. The table below sets out the apportionment targets for Hammersmith and Fulham in the Mayor's London Plan 2016 and the throughput capacity of the Powerday waste site would be capable of fully meeting (and exceeding) this apportionment and generates surplus capacity of up to 179,000 in 2036.

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

OPDC has produced a Waste Management Strategy for the whole of its area, looking at how to increase reuse and recycling and support on-site energy generation. The National Planning Policy for Waste (NPPW) requires waste planning authorities (WPAs) to consider opportunities for on-site management of waste where it arises. In line with this, policies EU6 and EU10 of OPDC's Local Plan support on-site waste management and the delivery of infrastructure for on-site energy generation and distribution, in accordance with Policy 5.16 of the Mayor's London Plan. These policies require energy generating opportunities are future proofed to enable connection into area-wide district heating networks. As the site already produces an RDF, there is potential for Powerday to provide heat/fuel as part of a wider energy network. The Local Plan policy position demonstrates this clear commitment to working with the operator to optimise the use of the site in order to contribute towards meeting LBHF's waste apportionment, including make use of any fuels on site and as part of contributing towards a wider energy strategy. OPDC will be undertaking further work to explore the feasibility of on-site energy generation.

3.20 The only other relevant site is the European Metal Recycling (EMR) waste site. 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	Municipal and commercial and industrial (C+I) waste (tonnes)	Other waste (tonnes)	Total (tonnes)	Municipal and C+I (%)
2011	231,985	18,407	250,985	92.4
2012	169,318	25,074	194,393	87.1
2013	92,573	30,629	123,393	75.0
2014	86,712	27,837	114,549	75.7

3.21 As noted in paragraph 2.13, the Mayor of London's 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' 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 having the potential 1200 homes and 500 jobs; 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'. 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.

3.22 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 for apportionment purposes. However, in line with the London Plan Policy 5.16H, Policy EU6 seeks compensatory provision for the loss of other waste management sites and sets out the sequential approach to finding an alternative site.

Sufficient land allocated

3.23 As an alternative assessment, OPDC has calculated potential land requirements using the Babtie formula which assumes 1 hectare of land can deliver 80,000tpa of waste management capacity. This figure was applied in the "London Waste Apportionment Part A" (Jacobs Babtie 2006), as an

approximate measure of the potential waste management capacity deliverable per hectare of development land and formed part of the London Plan evidence base. Therefore, this was identified as an appropriate for measuring the amount of land that should be allocated. The adopted West London Waste Plan, which covers Brent and Ealing parts of the OPDC area, assumed 65,000 tonnes per hectare, so for completeness, both measures have been assessed.

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

	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

3.25 At 3.9 hectares, the Powerday waste site exceeds the required land allocation in both instances. The EMR site is not considered for the reasons set out in paragraph 3.22 above.

4. Other considerations

Waste self-sufficiency

4.1 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).

4.2 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. Similarly, for the part of the OPDC area within the London Borough of Hammersmith and Fulham (LBHF), this Study demonstrates how the OPDC can contribute toward net self-sufficiency in waste across London. The WRWA Waste Technical Paper identifies where waste has been imported from and exported to, so further engagement has been undertaken with these waste planning authorities.

5. Conclusion

5.1 The Powerday waste site meets the London Borough of Hammersmith and Fulham's apportionment target in terms of available/future capacity on the site to manage the required amount of waste and in terms of sufficient land being available for waste purposes. As such, and in accordance with Policy 5.17

and Table 5.4 of the London Plan (2016), OPDC's Local Plan Policy EU6 is safeguarding this waste site for the lifetime of the Local Plan.