OPDC
OLD OAK AND
PARK ROYAL
DEVELOPMENT
CORPORATION

Waste Apportionment Study

LOCAL PLAN SUPPORTING STUDY

June 2018

MAYOR OF LONDON

57. 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.
Key changes made since Reg 19 (1)	Includes additional information with reference to the draft new London Plan apportionment targets. The study also updates assumptions for the Old Oak Sidings (Powerday) site.
Relations to other studies	Informed by outputs from the Waste Technical Paper. Interfaces with the Waste Management Strategy and Utilities 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 Statement

1. Purpose of this strategy

1.1 The OPDC Waste Apportionment Statement has been produced to summarise the approach taken in OPDC's Local Plan. The Statement 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 (2016). This Statement should be read in conjunction with policies in OPDC's Local Plan, particularly Policy EU6.

2. Context

Background to OPDC

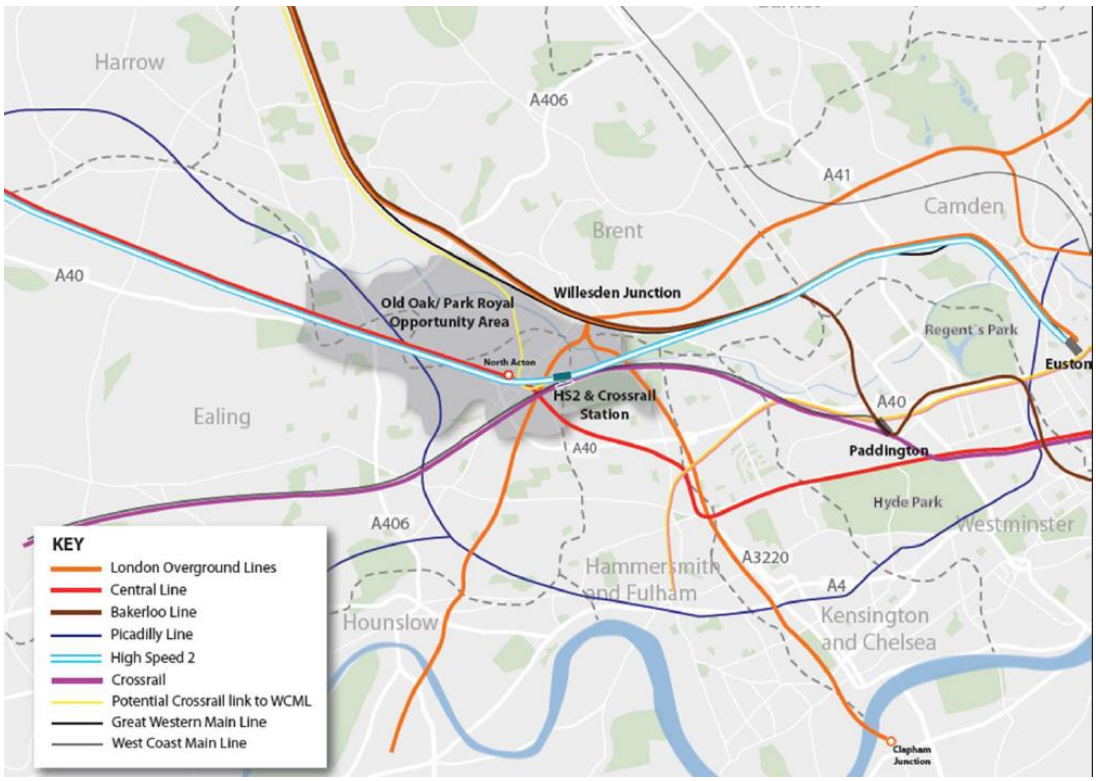
2.1 On April 1st 2015, the Mayor of London established OPDC. On this date, OPDC became the local planning authority for the area, taking on planning functions normally available to a London borough, including plan making powers and the determination of planning applications. OPDC also has powers to be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

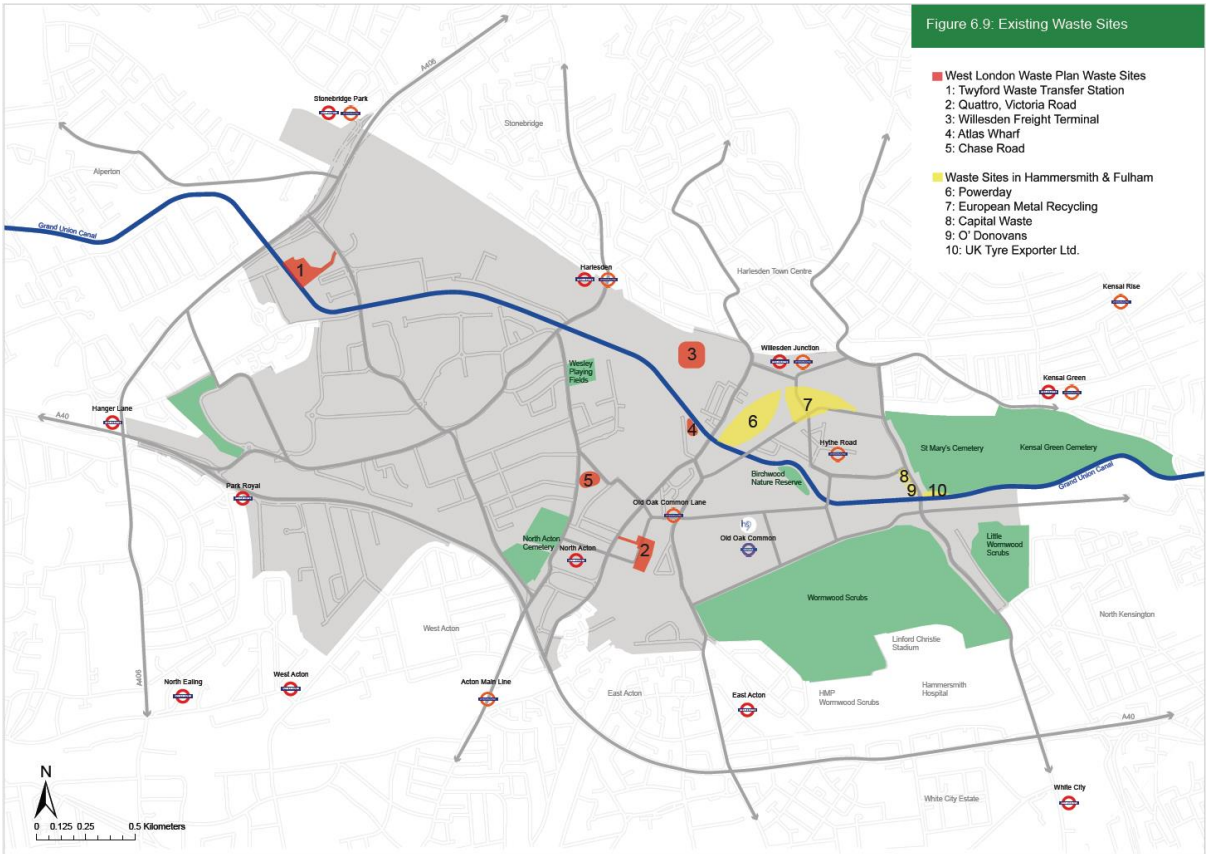
Figure 2: OPDC context



Waste site and capacity context

Figure 3 identifies the existing waste sites which now fall within the remit of OPDC's Local Plan. Five of the waste sites are within the London Boroughs of Ealing and Brent and are covered by the West London Waste Plan. The other five waste sites are within the London Borough of Hammersmith and Fulham. The table below provides further details on each of the sites including the borough 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	See details in West London Waste Plan	
2	Quattro, Victoria Road	Quattro, Victoria Road, Park Royal, Ealing	Ealing	See details in West London Waste Plan	
3	Willesden Freight Terminal	See details in West London Waste Plan	Ealing	See details in West London Waste Plan	
4	Atlas Wharf	See details in West London Waste Plan	Ealing	See details in West London Waste Plan	
5	Chase Road	See details in West London Waste Plan	Ealing	See details in West London Waste Plan	
6	Powerday (Old Oak Sidings)	Old Oak Sidings, Off Scrubs Lane, Willesden, London, NW10 6RJ	Hammersmith and Fulham	3.9	Deals with construction and demolition waste but also some municipal, commercial and industrial waste

7	European Metal Recycling (EMR)	106 Scrubs Lane, Willesden, London, NW10 6QY	Hammersmith and Fulham	4.4	Metals reclamation, primarily scrap cars and fridges
8	Capital Waste Ltd	104, Scrubs Lane, Willesden, London	Hammersmith and Fulham	0.26	Scrap metal storage and transfer station
9	O'Donovan Waste Disposal Ltd	Scrubs Lane	Hammersmith and Fulham	0.27	Waste storage and transfer station
10	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

2.4 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

2.5 The Waste Management Plan for England provides an analysis of the current waste management situation in England and a framework to support further implementation of the objectives and provisions of the European Waste Framework Directive.

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 more detailed policy guidance on waste. It sets out the criteria for waste planning authorities as follows:

- Use of a proportionate evidence base on which to set waste planning policies;
- Identification of the need for waste management facilities;
- Identification of suitable sites and areas for waste management infrastructure;
- Determination of planning applications for new waste management

infrastructure; and

- Monitoring and reporting of allocated sites and areas, changes in the type and capacity of waste management facilities, changes in waste arisings, and quantities of waste recycled, recovered and disposed.

2.9 The National Planning Practice Guidance (NPPG) states that waste planning authorities (WPAs) should have regard to the apportionments set out in the London Plan when developing their policies.

Regional

2.10 The Mayor's London Plan (2016) provides the relevant policy context for how OPDC must deal with waste within its area.

2.11 The London Plan (2016) sets out projections of how much Household (HH) and Commercial & Industrial (C&I) 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.

2.12 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.

2.13 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'. The table below shows the apportionment targets for the three local authorities in the OPDC area established through the current London Plan (2016).

Figure 4: Host boroughs' waste apportionment target

	Apportionment Target	Brent (tonnes)	Ealing (tonnes)	Hammersmith and Fulham (tonnes)
London Plan (2016)	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

2.14 The current London Plan has significant weight as part of OPDC's Development Plan. However, it is noted that a new Draft London Plan was published in December 2017. The new draft London Plan proposes to update the apportionment targets, with targets reduced for Hammersmith and Fulham, but increased for Brent and Ealing. The new draft London Plan does not propose a separate apportionment target for OPDC and OPDC is supportive of this approach.

2.15 OPDC's Local Plan is supporting host boroughs to meet the targets in the 2016 London Plan or in their adopted Local Plans. However, the potential need for a future review of waste policy, if changes are required in order to help host boroughs to meet higher waste apportionment targets, is identified in OPDC's Local Plan.

2.16 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. OPDC's approach to planning for waste

3.1 This Paper outlines the approach taken by OPDC to meet the requirements of paragraph 5.80.

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 5). 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 3.9 onwards.

Figure 5: Waste authority areas in London (OPDC area in red)

<u>Approach in London Boroughs of Brent and Ealing</u>

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 as well as other waste streams not apportioned in the 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). The London Plan (2016) significantly reduced the waste apportionment for the London Boroughs of Brent and Ealing relative to 2011 London Plan targets. Therefore, the WLWP comfortably deals with the 2016 waste apportionment targets. The WLWP also includes policies for other non apportioned waste, addressing national planning policy requirements.

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), alongside the six other local authorities involved. This committed OPDC to safeguard the waste sites identified in the WLWP that fall within the Brent and Ealing parts of the OPDC area listed in Figure 3. To ensure consistency with this, OPDC's emerging Local Plan (policy EU6) requires proposals to comply with, and safeguards sites identified in, the WLWP.

3.8 In light of the above, through the adoption of the WLWP, OPDC considers that it has satisfied the requirements of paragraph 5.80 to ensure that the apportionment requirements in the 2016 London Plan are met in respect of the London Boroughs of Brent and Ealing. However, it is noted that further work will be required to understand the implications of the proposed waste apportionment targets in the new draft London Plan.

Approach in London Borough of Hammersmith and Fulham

3.9 The London Borough of Hammersmith and Fulham sits within the Western Riverside Waste Authority (WRWA). The WRWA covers four local authorities:

- 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)

3.10 The WPAs within the WRWA have elected to deal with waste planning matters through their respective Local Plans. For Hammersmith and Fulham, the recently adopted Local Plan (2018) sets out their strategic waste policy.

3.11 OPDC has been working with the WRWA boroughs constructively, actively and on an ongoing basis in the preparation of the Local Plan. The outputs of this include the WRWA Waste Technical Paper (WTP). The WRWA WTP provides evidence for the Western Riverside WPAs on:

- waste arisings and forecasts
- waste capacity available in the WRWA area, taking into account site closures, and an assessment of capacity gaps
- the management of other waste streams not apportioned in the London Plan.

3.12 A note has been prepared to update the assumptions for the Old Oak Sidinigs (Powerday) site and is appended to this Statement. The findings in this report related to Powerday reflect the note.

Capacity in identified waste management facilities

3.13 The WTP assessed the whole LBHF borough, including the OPDC area. It took into account site closures in the OPDC area and assessed capacity for other waste streams in the LBHF (and OPDC area). The LBHF Waste Background Paper underpinning LBHF's Core Strategy demonstrates capacity for different types of waste arising within the whole LBHF area, again this will include waste arising in the OPDC area, based on the WTP. The WTP and LBHF Waste Background Paper confirm that LBHF's waste apportionment targets can be met if the Powerday site is safeguarded.

3.14 There have been updates to the assumptions for the Powerday site since the publication of the WTP (see Note appended to this Statement). Through further engagement with the operator of the site, it is now understood that the Powerday site could manage up to 1 million tonnes of waste rather than 1.6 million tonnes used in the WTP.

3.15 The WTP used the licensed capacity (1.6 million tonnes) as the total throughput for the Old Oak Sidings (Powerday) site but the total throughput of other facilities in the WTP was based on the maximum recent throughput. The higher capacity used for Powerday in the WTP is justified due to the unique circumstances of the site. OPDC understands through discussions with Powerday that the variance between the current operational capacity and the licensed capacity 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.

3.16 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, the operator has confirmed that it is actively pursuing commercial opportunities. The site operator has confirmed that subject to securing these commercial opportunities, the site would have the capacity to manage up to 1 million tonnes of waste.

3.17 To support the site to achieve a higher throughput, 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.

3.18 Over the last five years, the maximum proportion of MSW/C&I being managed was 42.6%. Assuming that 42.6% of waste throughput would most likely continue to be C&I, taking into account waste going to landfill and the site reaching an operating capacity of 1 million tonnes per annum, 411,171 tonnes could be available. The remaining amount capacity could still be available for other types of waste.

3.19 Table 3 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 in 2036.

3.20 Table 2 below also sets out how much construction and commercial/ industrial waste the site could manage if it reached an operating capacity of 1 million tonnes per annum (optimising the use of water and rail) and based on the maximum proportions of each type of waste currently managed.

Figure 6: Potential operational capacity in 2036

Construction waste (tonnes)	Commercial and industrial (C&I) waste (tonnes)	Total (tonnes)	% of C&I of the total potential throughput	Total applicable to meeting apportionment targets
574,000	426,000	1,000,000	42.6%	411,171

3.21 Achieving 1 million tonnes instead of 1.6 million tonnes would still enable LBHF to meet its apportionment target, both the 2016 and proposed new 2017 apportionment targets.

Figure 7: LBHF Apportionment Targets

	Target date	Apportionment Target
London Plan (2016)	2016	172,000
	2021	199,000
	2026	238,000
	2031	242,000
	2036	247,000
Draft London Plan (2017)	2021	210,000
	2041	222,000

3.22 The European Metal Recycling (EMR) waste site 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 between 2011-2014).

Figure 8: Throughput figures for EMR

Year	Municipal and commercial and	Other waste	Total (tonnes)	Municipal and C+I

	industrial (C+I) waste (tonnes)	(tonnes)		(%)
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

3.23 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 the EMR 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 1100 homes and 1500 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.

3.24 In light of the Powerday site meeting the London Borough of Hammersmith and Fulham's apportionment needs, OPDC does not propose to safeguard the EMR waste site for apportionment purposes. While it is likely the site will remain in waste use for the short to medium term, it is not proposed to count this capacity towards helping to meet the borough's waste apportionment. The closure of this site was taken into account in the WTP.

3.25 When the site is redeveloped, in line with the London Plan Policy 5.16H, Policy EU6 seeks compensatory provision for the loss of waste management sites and sets out the sequential approach to finding an alternative site.

Sufficient land allocated

3.26 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.

3.27 Figure 9 below sets out the required land to meet the London Borough of Hammersmith and Fulham's apportionment in 2036 applying both assumptions.

Figure 9: Land take 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

3.28 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 Hammersmith and Fulham's apportionment target in terms of available/future capacity on the site to manage the required amount of waste. The sites identified in the WLWP help meet Brent and Ealing waste apportionment targets. OPDC considers that the approach in the Local Plan, including safeguarding these waste sites, is in accordance with Policy 5.17 and Table 5.4 of the London Plan (2016).

Old Oak Sidings (Powerday) – Updated Assumptions
May 2018

Background

The Waste Planning Authorities (WPAs) within the Western Riverside area are working together on evidence to enable each borough to plan for waste in their Local Plans. The WPAs are:

- The Royal Borough of Kensington and Chelsea (RBKC);
- The London Borough of Hammersmith and Fulham (LBHF);
- The London Borough of Wandsworth (LBW);
- The London Borough of Lambeth (LBL); and
- The Old Oak and Park Royal Development Corporation (OPDC)[1]

The Mayor's London Plan sets out projections of how much household, commercial & industrial waste likely to be generated in the capital over the next 20 years. Each London Borough has been apportioned an amount of Household (HH) and Commercial & Industrial (C&I) waste that it is required to positively plan for and manage (known as an apportionment target).

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'.* However, OPDC has been working in partnership with the Western Riverside WPAs to understand waste capacity in the wider area which will help to ensure that, where appropriate, as much apportioned waste as possible is managed within the WRWA area.

Western Riverside Waste Technical Paper

The WPAs prepared a joint study– Waste Technical Paper – to provide an up-to-date waste evidence base on waste arisings and capacity for all seven waste streams. The Waste Technical Paper (WTP) forms part of the evidence base supporting the WPA's Local Plans and has been published as part of individual WPA's Local Plan consultations.

The WTP used the licensed capacity (1.6 million tonnes) as the total throughput for the Old Oak Sidings (Powerday) site but the total throughput of other facilities in the WTP was based on the maximum recent throughput. Powerday is a unique site, the operators have explained that the variance between the current operational capacity and the licensed capacity is partially as a result of a planning condition which restricts the amount of waste to be imported by road. Therefore, there is potential to optimise the throughput of the site by maximising the use of rail and water transport

[1] For OPDC, the joint evidence base only includes the land within the OPDC boundary which falls within LBHF. The remainder of the OPDC's land falls within the London Boroughs of Brent and Ealing which are part of the West London Waste Authority (WLWA) and Waste Plan (WLWP), therefore these parts of the OPDC are not part of the WRWA and not within the scope of any joint work.

The facilities on the Old Oak Sidings site use commercial & industrial and construction wastes as input to produce a range of recyclates and a quality Refuse Derived Fuel (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 that can be resold to recycling facilities (e.g. wood products, hard plastics, metals and cardboard). Residual materials from this process (which include small wood chips and unrecoverable paper and cardboard) are processed into Refuse Derived Fuels (RDF) or Solid Recovered Fuel (SRF) products.

The WPAs met with the GLA on 3rd February 2017 to discuss the findings of the Waste Technical Paper, they requested additional verification of the figures/assumptions used for the Powerday site in OPDC. Specifically, they asked for verification on the following points:

- Whether it is possible for the site to treat the assumed 1.6 million tonnes.
- What proportion of the waste could be counted towards apportionment
- The potential for energy recovery at Powerday (as this would meet the criteria of 'managed waste' set out in para 5.79 of the London Plan)

Since this time, additional information and verification has been sought from the operators of the Powerday site. The EA has confirmed the licenced capacity and referred us to the operator (Powerday) to provide a suitable tonnage that can be achieved within the limits of the licenced capacity. Through discussions with Powerday, they have confirmed that they could process 1 million tonnes (further information is provided below) if waste was transported by rail and water. The maximum proportion of C&I treated on the site over the last 5 years is 42.6%. 42.6% has been used to calculate the proportion of waste throughput that could count towards apportionment. The amount of C&I waste that is not 'managed' has also been discounted.

The table below provides a summary of the updated working assumptions related to the Old Oak sidings (Powerday) site.

Old Oak Sidings (Powerday) – working assumptions

Site area	3.9ha
Waste Source	This facility deals with construction waste, however it has also been accepting a significant 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).
Current permitted capacity[2]	The EA Licence permits 1.6 million tonnes and the planning permission does not restrict this capacity, except to restrict the amount of waste imported onto the site by road (546,000 tonnes).

[2] Source: EA Licence information and Planning Decision Notice

	The Environment Agency issues the licences and advises permitted capacity can be deceptive. Permits may be based on a standardised tonnage associated with the permit and may bear no relation to the actual throughput. Therefore, they have advised the WRWA WPAs to verify the future potential throughput with the site operator (see Future Capacity below).
Current operational capacity[3]	Table 1: Recent operational capacity Over the last five years, the maximum proportion of C&I of the total throughput of the site reached up to 42.6%.
Future Capacity	The operator has confirmed that the site could be capable of handling 1 million tonnes per annum if waste was able to be brought in by rail and canal. The tables below sets out how much construction and commercial/ industrial waste the site could manage if reached an operating capacity of 1 million tonnes per annum (optimising the use of water and rail) and the maximum proportions of each type of waste currently managed. Table 2: Potential operational capacity in 2036

Table 1: Recent operational capacity

Year	Construction waste (tonnes)	Commercial and industrial (C&I) waste (tonnes)	Total (tonnes)	Construction (%)	C+I (%)
2012	210,593	145,338	355,931	59.2	40.8
2013	268,288	91,355	359,643	74.6	25.4
2014	198,894	147,428	346,322	57.4	42.6
2015	231,949	115,329	347,448	66.8	33.2
2016	240,847	90,281	331,347	73	27

Table 2: Potential operational capacity in 2036

Construction waste (tonnes)	Commercial and industrial (C&I) waste (tonnes)	Total (tonnes)	Municipal and C+I (%)	Total applicable to meeting apportionment targets**
574,000	426,000	1,000,000	42.6%*	411,171

* Based on the maximum proportion achieved over the last 5 years (see Table 1)
** Only takes into account waste that is deemed to be managed. Assumes delivery of new modes so that by 2036, 300,000 tonnes per annum transported by water and 240,000 tonnes per annum transported by rail. Indicative amounts transported by water and rail based on engagement with operator.

[3] Source: Waste Data Interrogator

Evidence of achievability	Engagement with the operator has confirmed that the site could be optimised and can deliver the future capacity set out below based on the following: • They have an operational rail head and wharf so it is operationally feasible for them to transport waste via these modes. • They are in commercial negotiations to enter into contract to import/export waste by water and rail so they will be able to increase the amount of waste they manage. • Powerday have confirmed that they produce a combustible RDF. It is currently exported overseas but could be used to produce local energy in the future to help serve the Old Oak development. In line with GLA advice, this approach would meet the definition of managed waste in the London Plan. • OPDC Utilities Study (April 2017) identified local low carbon heat sources that could meet the expected baseload heat demands of Old Oak for at least the first twenty years of development. These include the potential for heat offtake from the Powerday plant, which is one of the largest local low carbon heat sources in the area. Meetings were held with Powerday and the GLA, between September 2016 and March 2017, to inform this Study. OPDC will be undertaking further work to explore the feasibility and impacts of on-site energy generation.