

Local Plan Independent Examination

OPDC Response to Hearing Actions (Matter 2h – waste facilities)

OPDC to provide paper on whether the Plan has taken into account the latest information on waste arisings (provided in the Draft new London Plan)?

- 1.1. Updated projected arisings for Household (HH) and Commercial & Industrial (C&I) waste for each borough have been identified in Table 9.1 of the draft new London Plan (2017) and are shown in table 1. These are calculated by borough, therefore data on the OPDC area will be subsumed within the overall borough projections for Brent (LBB), Ealing (LBE) and Hammersmith and Fulham (LBHF).

Table 1 – Draft new London Plan (2017) arisings (tonnes per annum)

	2011	2016	2021	2026	2031	2036	2041
LBB HH C&I arisings			260,000				274,000
LBE HH C&I arisings			291,000				306,000
LBHF HH C&I arisings			183,000				190,000

- 1.2. The waste arising projections establish data benchmarks. In accordance with current London Plan policy (5.17) and draft new London Plan policy (SI8), each borough should plan for the waste apportionment. However, analysis on how the updated waste arisings have been accounted for is set out below and can be summarised as follows:
- For Brent and Ealing, the updated 2017 arisings are lower than those referred to in the adopted West London Waste Plan (WLWP). Therefore, there is no material impact on the WLWP and policy EU6 in the OPDC draft Local Plan with respect to waste arisings.
 - For Hammersmith and Fulham, the updated 2017 arisings are higher in 2021 than was projected in the 2016 London Plan. However, the draft OPDC Local Plan is based on LBHF meeting their 2016 waste apportionment target, which is higher than the updated 2017 waste arisings.

Approach taken in OPDC area

- 1.3. Waste policies for the OPDC area are contained in the adopted WLWP and the draft OPDC Local Plan.
- 1.4. The WLWP covers 6 London Boroughs, comprising Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond upon Thames, and also part of the OPDC area (for areas within Brent and Ealing).

West London Waste Plan boroughs

- 1.5. The HH and C&I waste arisings used to inform the WLWP are set out in table 2. It should be noted that, compared to the 2017 draft new London Plan (shown in table 1), the arisings set out in the WLWP are significantly lower. Notwithstanding the fact that waste arisings are not set as targets in the London Plan, as the updated arisings are lower there is no material impact on the WLWP in this respect and therefore policy EU6 in the OPDC draft Local Plan.

Table 2 – Previous London Plan (2011) arisings (tonnes per annum)

	2011	2016	2021	2026	2031
LBB HH C&I arisings	338,000	343,000	348,000	352,000	355,000
LBE HH C&I arisings	390,000	383,000	381,000	385,000	388,000
LBHF HH C&I arisings	275,000	281,000	288,000	298,000	311,000

Hammersmith and Fulham / Western Riverside Waste Authority boroughs

- 1.6. OPDC has also worked with Hammersmith and Fulham and the other WRWA boroughs on the WRWA Waste Technical Paper (WTP).
- 1.7. The HH and C&I waste arisings used for LBHF (and others) in the WTP report were based on the 2016 London Plan, as set out in table 3. The 2017 LBHF waste arisings (183,000 in 2021 and 190,000 in 2041) are higher in 2021 than was projected in the 2016 London Plan (176,000 in 2021) and there is no comparison for the 2041 date as no targets were set for this in 2016.

Table 3 – Current London Plan (2016) arisings (tonnes per annum)

	2011	2016	2021	2026	2031	2036
LBB HH C&I arisings		245,000	250,000	255,000	260,000	264,000
LBE HH C&I arisings		281,000	286,000	289,000	293,000	298,000
LBHF HH C&I arisings		175,000	176,000	176,000	178,000	180,000

- 1.8. The higher 2017 waste arisings figure is accounted for as the draft OPDC Local Plan is based on LBHF meeting their 2016 waste apportionment target (as shown in Table 4), which is higher than the waste arisings. As can be seen from the figures, the 2016 LBHF waste apportionment target is set for 199,000 tonnes in 2021, compared to the updated draft new London Plan waste arisings of 183,000 in 2021.

Table 4 – Draft new London Plan (2017) apportionment targets (tonnes per annum)

	2011	2016	2021	2026	2031	2036	2041
LBHF apportionment target		172,000	199,000	238,000	242,000	247,000	

- 1.9. OPDC has identified sites which demonstrate that there is sufficient capacity to meet LBHF's 2016 waste apportionment target. It is worth noting that the Powerday site is capable of achieving a higher total throughput, giving it capacity to manage over 400,000 tonnes of HH/CI waste so there is headroom in any case.
- 1.10. In conclusion, notwithstanding the fact that waste arisings are not targets in the London Plan, the updated arisings for LBHF have no material impact on draft policy EU6.

Updated waste apportionment targets

- 1.11. OPDC acknowledge that the draft new London Plan includes revised waste apportionment targets and that these targets are significantly higher for Brent and Ealing than the 2016 London Plan targets.

- 1.12. Paragraph 6.73 of the draft OPDC Local Plan recognises that an early review of EU6 may be necessary. Given the stage that the draft new London Plan has reached and the range of partners who were previously involved in the WLWP, OPDC consider that an early review is the most pragmatic approach to addressing this matter given these circumstances. We want to continue to work positively and constructively with the host boroughs, as we have done to date when adopting the WLWP and working with LBHF, in accordance with the current London Plan, the new draft London Plan, as well as the duty to cooperate requirements.