

# Wandsworth Local Plan Review: Waste Evidence Base

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## Contents

<b>Executive Summary</b> .....	3
<b>1. Introduction</b> .....	5
<b>Previous waste evidence base work</b> .....	6
<b>Public consultation on Wandsworth’s Local Plan</b> .....	7
<b>Policy context</b> .....	10
<b>2. Waste management in Wandsworth</b> .....	25
<b>Waste arisings</b> .....	25
<b>3. Waste imports and exports</b> .....	27
<b>Summary of waste exports</b> .....	27
<b>Inert (CD&amp;E) waste exports</b> .....	31
<b>Hazardous waste exports</b> .....	32
<b>Waste Imports</b> .....	35
<b>Duty to Co-operate</b> .....	36
<b>4. Identifying waste need</b> .....	39
<b>LACW and C&amp;I waste need</b> .....	40
<b>CD&amp;E waste need</b> .....	40
<b>Hazardous waste</b> .....	41
<b>Other waste streams</b> .....	41
<b>Summary of waste need</b> .....	41
<b>Existing sites and capacity</b> .....	42
<b>Capacity Gap</b> .....	48
<b>Land required to meet capacity gaps</b> .....	49
<b>5. Land search</b> .....	50
<b>6. Wandsworth’s Waste Planning Strategy</b> .....	55
<b>Amount and location of new land</b> .....	55
<b>Policy Recommendations</b> .....	55
<b>Monitoring</b> .....	56
<b>Ongoing duty to co-operate on cross-boundary waste matters</b> .....	57
<b>Appendix A: Site Profiles</b> .....	58
<b>Appendix B: Exports Tables</b> .....	74
<b>Appendix C: Duty to Co-operate Responses June 2017</b> .....	82
<b>Appendix D: Review of Industrial Land for Waste Use</b> .....	91

## Executive Summary

- I. This Waste Evidence Base has been prepared to support Wandsworth's Local Plan review.
- II. Wandsworth is required to plan for seven waste streams. The largest of these are Local Authority Collected Waste (LACW), Commercial & Industrial Waste (C&I) and Construction, Demolition and Excavation Waste (CD&E). The London Plan apportions an amount of LACW and C&I waste to each borough and Wandsworth is required to have regard to these apportionment targets.
- III. The London Plan also aims for net self-sufficiency for all waste streams, except excavation waste, by 2026. For Wandsworth, net self-sufficiency means providing enough waste capacity to manage the equivalent amount of Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste apportioned by the London Plan, the equivalent amount of Construction and Demolition (C&D) waste generated in Wandsworth, and as much Excavation waste as practicable.
- IV. Net self-sufficiency takes account of the fact that some imports and exports will continue. Imports and exports will always happen because of contracts for waste management and because it is not possible for Wandsworth to accommodate the full range of facilities required to manage all of the waste generated in the Borough (that would be self-sufficiency, not net self-sufficiency).
- V. Waste projections over the Local Plan period are set out in the table below.

Table ES1: Wandsworth waste need 2021-2036

	2021	2026	2031	2036
LACW/C&I waste apportioned to Wandsworth in the London Plan <sup>1</sup>	264,000	266,000	268,000	274,000
C&D waste	85,000	85,000	85,000	85,000
Excavation waste	250,000	250,000	250,000	250,000
All other waste streams	0	0	0	0

- VI. There is existing waste management capacity at the 14 existing licenced waste sites in Wandsworth as well as exempt facilities, and potential capacity from non-operational waste sites. However, the Borough's existing capacity is not enough to meet its need.

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<sup>1</sup> Apportionment targets in the London Plan are provided for 2021 and 2041 only. The figures for years 2026, 2031 and 2036 have been estimated using Wandsworth's apportionment share of 3.2% of the overall waste arisings in London.

- VII. The difference between waste need and waste capacity (the capacity gap) is shown in Tables E4 and E5 below. Capacity gaps are shown separately for LACW/C&I (apportioned) waste streams and CD&E waste streams. Construction and Demolition waste is separated out from Excavation waste (soils and stones) because of the different management routes for each.

Table ES2: LACW and C&I (apportioned) waste capacity gap

LACW and C&I	2021	2026	2031	2036
Apportionment target	264,000	266,000	268,000	274,000
Existing known capacity	147,544	147,544	147,544	147,544
<b>Capacity gap for LACW and C&amp;I</b>	<b>116,456</b>	<b>118,456</b>	<b>120,456</b>	<b>126,456</b>

Table ES3: CD&E waste capacity gap

C&D + as much E as possible	2021	2026	2031	2036
Projected C&D waste arisings	85,000	85,000	85,000	85,000
Existing waste management capacity <sup>2</sup>	87,258	87,258	87,258	87,258
<b>Capacity Gap for C&amp;D</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Projected E waste arisings	250,000	250,000	250,000	250,000
Capacity towards off-setting E waste	2,258	2,258	2,258	2,258

- VIII. Indicative land requirements to meet the capacity gap for LACW and C&I waste over the Plan period shows that up to 2.1ha of land will be required by 2026.
- IX. In order to achieve net self-sufficiency, Wandsworth will need to safeguard all its existing waste sites and the Local Plan will need to identify locations suitable for new waste facilities. No individual sites for new waste facilities have come forward, so the most suitable locations are existing waste sites and designated industrial land (SILs and LSIAs). Some new recycling capacity could come forward at a waste transfer facility with planning permission which has not yet been built, but the amount is not yet known.
- X. Opportunities for new waste facilities to come forward to meet the capacity gap will be focused in existing Strategic Industrial Land and Locally Significant Industrial Areas. Not all types of waste facilities are suitable for the urban environment of Wandsworth and where a site is likely to produce significant air quality, dust or noise impacts, it should be fully enclosed. In order to meet the high recycling targets set by the Mayor, Wandsworth should particularly encourage additional recycling capacity.

<sup>2</sup> Existing licensed and exempt waste management capacity

# 1. Introduction

## Wandsworth's Local Plan Review

- 1.1 Wandsworth is conducting a full review of its Local Plan 2016, including waste policies. Wandsworth has a responsibility to plan for seven waste streams, including household, business and construction waste. It has a further duty to have regard to the apportionments set out in the London Plan.
- 1.2 This Waste Evidence Base has been prepared to support Wandsworth's Local Plan review. In line with national policy, this evidence base looks at Wandsworth's need for all seven waste streams, including waste apportioned by the London Plan. It looks at the current waste management picture in the borough, where and how Wandsworth's waste is being managed (sections 2 and 3).
- 1.3 Importantly, this evidence base identifies Wandsworth's waste need by identifying how much waste will need to be managed over the plan period, existing capacity and the capacity gap, and how much land is needed to meet the capacity gap (section 4). It also identifies where Wandsworth's waste is exported to, summarises engagement with recipient waste planning authorities to date, and suggests next stages in the 'duty to co-operate' process (section 3).
- 1.4 A key policy requirement for waste in Wandsworth is contributing towards London's net self-sufficiency target, as set out in the London Plan. Net self-sufficiency means providing enough waste capacity to manage the equivalent of the waste need in Wandsworth, while recognising that some imports and exports will continue. Wandsworth's waste need is summarised in Table 4.2 of this Waste Evidence Base.
- 1.5 Net self-sufficiency takes account of the fact that some imports and exports will continue. Imports and exports will always happen because of contracts for waste management and because it is not possible for Wandsworth to accommodate the full range of facilities required to manage all of the waste generated in the Borough (that would be self-sufficiency, not net self-sufficiency). For example, the contract that the Western Riverside Waste Authority has with Cory means that some of Wandsworth's household waste is managed in the Borough (at Cory's Materials Recycling Facility at Smugglers Way) and some is managed in Bexley (at Cory's Energy from Waste Facility). In order to achieve net self-sufficiency for household waste, Wandsworth would need enough capacity to manage an equivalent amount of all household waste generated in the Borough, regardless of where it is actually managed.
- 1.6 Safeguarding existing waste management capacity is an important part of the strategy to meet Wandsworth's waste needs. All waste sites in Wandsworth are safeguarded in line with London Plan policy. However, existing waste facilities do not provide enough

capacity to meet Wandsworth's waste need and therefore land suitable for new facilities needs to be identified.

- 1.7 This Waste Evidence Base identifies the most appropriate locations for new waste facilities and the types of waste facilities suitable within the borough. This evidence base also identifies a waste planning strategy for Wandsworth and makes recommendations for the Local Plan waste policy.
- 1.8 The current Local Plan was adopted in March 2016, with an additional Employment and Industry Document (December 2018) which replaced employment and industrial land policies, area spatial strategies and site allocations in the existing Local Plan.
- 1.9 In December 2018, the Council produced the Local Plan Review Issues Document, which sets out the high-level issues that the Council has identified following a review of the existing Local Plan and National and Regional policy. The Council held a public consultation on this document from December 2018 to February 2019.
- 1.10 The Local Plan Review Issues Document included a section on waste planning and asked three questions on the topic area. Nine representations were received, and these are set out below along with how these comments will be taken account of in Wandsworth's new Local Plan waste policies.
- 1.11 As part of the preparation for the Local Plan, the Council held a Call for Sites: an invitation to all individuals, developers, landowners, agents and other interested parties to submit details of sites within the borough that may be available for redevelopment over the lifetime of the Plan. This consultation ran from December 2018 to March 2019. No waste sites were put forward during this Call for Sites.

#### Previous waste evidence base work

- 1.12 Wandsworth lies with the 'Western Riverside' area of London and is one of four boroughs that make up the Western Riverside Waste Authority (WRWA) responsible for disposal of household waste.
- 1.13 Wandsworth forms part of the Western Riverside waste planning authorities of Wandsworth, Kensington & Chelsea, Hammersmith & Fulham, Lambeth and the Old Oak and Park Royal Development Corporation (OPDC). The OPDC is a Mayoral Development Corporation with planning powers for part of the borough of Hammersmith & Fulham (also Ealing and Brent). Wandsworth, Kensington & Chelsea, Hammersmith & Fulham and Lambeth make up the boroughs forming the Western Riverside Waste Authority, which has the responsibility of disposing of the boroughs' local authority collected waste.

- 1.14 In July 2016 a joint waste technical paper (WTP) was prepared by the Western Riverside authorities of Wandsworth, Lambeth, Kensington & Chelsea, Hammersmith & Fulham and Old Oak and Park Royal Development Corporation (OPDC). The purpose of the WTP was to provide an up-to-date evidence base to support waste planning. The waste technical paper is superseded by this Waste Evidence Base.
- 1.15 Once the WTP was completed, the Western Riverside authorities drafted a Memorandum of Understanding (MoU) to set out a joint working framework for waste planning. However there was no agreement on the pooling of existing capacity and apportionment targets as the basis for this joint working. Wandsworth, along with Kensington & Chelsea and Lambeth, aimed to plan for waste jointly across the Western Riverside area by pooling capacity and apportionment targets. National and regional policy both encourage joint working on waste. However, OPDC / Hammersmith & Fulham wanted to wait until further work on the capacity of the Powerday facility was completed before making a decision on pooling, but this work has not happened.
- 1.16 OPDC submitted their Local Plan to the Secretary of State in October 2018 and it is currently going through the examination in public process. Hammersmith & Fulham adopted their Local Plan in February 2018 and Kensington & Chelsea adopted their Local Plan in September 2019. Lambeth will submit their Local Plan in summer 2020.
- 1.17 Without participation from all the Western Riverside authorities, joint waste planning, including the pooling of apportionment and capacity, is not currently an option. Therefore, in order to progress waste policies in the Local Plan review, it is recommended that Wandsworth plans for waste independently.

#### Public consultation on Wandsworth's Local Plan

- In December 2018 the Local Plan Review Issues Document consultation included a section on waste planning and asked three questions on the topic area. These were:
  - Do you have any suggestions on how the Local Plan could help reduce levels of waste and contribute to meeting the recycling targets set by the draft London Plan?
  - Are there any sites or locations that should be considered as a site allocation as part of the Local Plan review for waste management?
  - Should the Council continue to protect its existing safeguarded waste management sites and if not/so why?
- 1.18 Nine responses about waste planning were received. These are set out in the table below alongside responses to the comments.

Table 1.1: Local Plan Review Issues Document (December 2018) consultation comments and responses

Name & Company	Comment	Wandsworth Response
<b>Q84: Are there any sites or locations that should be considered as a site allocation as part of the Local Plan Review for waste management?</b>		
Mr Peter Carpenter, Labour Party	Given that the level of waste is not forecast to increase, the existing facilities at WWRA should be sufficient for Wandsworth's medium term needs.	London Plan Table 9.1 shows LACW and C&I waste is forecast to increase over the plan period. This projected increase is reflected in Wandsworth's waste apportionment targets which also increases over the plan period (see section 4). The draft waste policy will need to be clear about this.
Catherine Carpenter, Lambeth Council	The NPPW and Draft London Plan direct new waste facilities to industrial land.	Noted. Wandsworth's policy approach is to intensify existing waste sites where possible and direct any new waste facilities towards industrial land. The draft waste policy will need to be clear about this.
Michael Atkins, Port of London	Yes, these sites must continue to be safeguarded in line with relevant London Plan policy, including policy 5.17 (Waste Capacity) of the current London Plan and SI 9 (Safeguarded Waste Sites) of the emerging London Plan.	Noted. Wandsworth has a capacity gap for its waste management needs over the plan period (see section 4) therefore will need to safeguard its existing capacity as well as identify areas for new waste facilities. A safeguarded waste site will only be released for other uses if replacement capacity is provided. The draft waste policy will need to be clear about this.
<b>Q85: Should the Council continue to protect its existing safeguarded waste management sites if no/so why?</b>		
Labour Group	No, all waste requirements should be fulfilled by current sites thru greater efficiencies and/or greater waste efficiency.	Wandsworth has a capacity gap for its waste management needs over the plan period (see section 4) therefore will need to safeguard its existing capacity as well as identify areas for new waste facilities. A safeguarded waste site will only be released for other uses if replacement capacity is provided.

Name & Company	Comment	Wandsworth Response
		The draft waste policy will need to be clear about this.
Mr Peter Carpenter, Labour Party	Yes, they are required for the efficient disposal of Wandsworth's waste.	Wandsworth has a capacity gap for its waste management needs over the plan period (see section 4) therefore will need to safeguard its existing capacity as well as identify areas for new waste facilities. A safeguarded waste site will only be released for other uses if replacement capacity is provided. The draft waste policy will need to be clear about this.
Catherine Carpenter, Lambeth Council	Both the current London Plan and the Draft London Plan require boroughs to safeguard waste sites for waste uses. A waste site can only be redeveloped for other uses if equivalent compensatory capacity is re-provided.	Wandsworth has a capacity gap for its waste management needs over the plan period (see section 4) therefore will need to safeguard its existing capacity as well as identify areas for new waste facilities. A safeguarded waste site will only be released for other uses if replacement capacity is provided. The draft waste policy will need to be clear about this.
Ms Susan Jones, Individual	Yes. I'm referring to the Waste Management site at Smugglers Way which allows for waste to be carried away on the river which is a great asset.	Wandsworth has a capacity gap for its waste management needs over the plan period (see section 4) therefore will need to safeguard its existing capacity as well as identify areas for new waste facilities. A safeguarded waste site will only be released for other uses if replacement capacity is provided. The draft waste policy will need to be clear about this.
Greater London Authority (GLA)	Wandsworth's waste apportionment target has been reduced in the new draft London Plan. It will be expected to manage 264,000 tonnes of household and commercial & industrial waste by 2021 and 280,000 tonnes by 2041.	Noted. Wandsworth has a capacity gap for its waste management needs over the plan period (see section 4) therefore will need to safeguard its existing capacity as well as identify areas for new waste facilities. A safeguarded waste site

Name & Company	Comment	Wandsworth Response
	Wandsworth should ensure it has enough safeguarded sites to meet its apportionment target in accordance with draft new London Plan Policy SI8 Waste capacity and net waste self-sufficiency.	will only be released for other uses if replacement capacity is provided. The draft waste policy will need to be clear about this.
Simon Ingyon, Enable Leisure and Culture	There may be implications for the financial viability of the grounds maintenance and tree management contracts if the site allocations for waste management are altered or reduced (as travel time to a waste facility out of the borough will increase costs and reduce efficiencies).	Noted. There are no plans to change allocated waste sites.

#### WANDSWORTH WASTE POLICY RECOMMENDATION:

Ensure that Wandsworth's plan for waste, and the justification for the approach, is explained clearly in the supporting text.

Be clear that waste apportionment targets for LACW and C&I waste streams increase over the plan period.

Include benchmark data so that Wandsworth's waste management capacity can be monitored.

## Policy context

1.19 The waste evidence base for Wandsworth and waste policies in Wandsworth Local Plan need to comply with EU (at the time of writing), national, regional and local policies. These are set out below.

### Revised European Waste Framework Directive

1.20 Many of the policies and targets for waste originate from the European Commission (EC), in particular the Revised European Waste Framework Directive (rWFD) and the Circular Economy Package. The Government's Brexit White Paper (February 2017) confirmed that the current framework of environmental regulation set out in EU

Directives will be transposed into UK law. This provides a degree of certainty in terms of policy direction for the immediate future, although monitoring will be essential after leaving the EU.

1.21 Article 28 of the Waste Framework Directive 2008 sets out the requirement for each Member State to produce a Waste Management Plan. This plan must set out an analysis of the current waste management situation and sufficient information on the locational criteria for site identification and on the capacity of future disposal or major recovery installations. These locational criteria are deferred to the Local Plans or Waste Plans of local authorities in the UK.

1.22 A published “Review of Waste Policy and Legislation” by the EC in 2015 resulted in a Circular Economy Package which introduced a range of higher targets for recycling and the phasing out of landfilling organic and recyclable materials. The London Environment Strategy has similar targets, such as recycling 65% of municipal waste by 2030, and these have been incorporated into the draft new London Plan.

### **Localism Act**

1.23 The Localism Act 2011 gave the responsibility for strategic planning back to local authorities acting individually. London is an exception to this and the Mayor has a responsibility for strategic planning through the London Plan, however waste planning is still the responsibility of individual Boroughs.

1.24 Section 110 of the Localism Act prescribes the “Duty to Co-operate” between local authorities in order to ensure that they work together on strategic issues such as waste planning. The duty is “to engage constructively, actively and on an on-going basis” and must “maximise the effectiveness” of all authorities concerned with plan-making. For matters such as waste planning, it is therefore important that local authorities can show that they have worked together in exchanging information and reaching agreement on their approach to waste planning.

1.25 Waste is a strategic cross-boundary issue and is subject to the duty to co-operate. This waste evidence base includes data on information on imports and exports of waste from Wandsworth to assist the borough with duty to co-operate engagement.

### **Resources and Waste Strategy**

1.26 The Government’s “Resources and Waste Strategy for England<sup>3</sup>” was published in December 2018, building on the recent “A Green Future: Our 25 Year Plan to Improve the Environment<sup>4</sup>” (January 2018). The overall strategy is to reduce the amount of waste produced, promote resource efficiency and move towards a circular economy.

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<sup>3</sup> <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>

<sup>4</sup> <https://www.gov.uk/government/publications/25-year-environment-plan>

- 1.27 There are a number of policy areas that could affect the amount and type of waste that local authorities have to plan for in the future. For example, producers paying for the disposal of their own packaging, a tax on plastic packaging which does not include 30% recycled content, deposit return schemes, streamlined recycling and food waste collection services, and greater efficiency of energy recovery facilities. The strategy is a 25 year plan and it remains to be seen how it will impact on how waste planning authorities plan for waste.
- 1.28 The Resources and Waste Strategy commits to reviewing the Waste Management Plan for England, National Planning Policy for Waste and the accompanying Planning Practice Guidance in 2019 to align national policies with the Resources and Waste Strategy. However, it seems likely that this timetable will slip and the review may influence the next iteration of Wandsworth's waste evidence base.
- 1.29 The Resources and Waste Strategy acknowledges the deficiency in data on waste and commits to develop a new approach to collecting waste data, including a move away from weight-based targets towards impact-based targets. The timetable for this review is not yet known and it is unlikely to affect this waste evidence base.

### **Waste Management Plan for England**

- 1.30 The Waste Management Plan for England (2013) reflects the requirements of article 28 of the Revised European Waste Framework Directive (rWFD). It sets out how much waste is generated in England and how that waste is managed. It also includes an assessment of waste infrastructure needs in the future and measures to meet the obligations of the rWFD.
- 1.31 It states that waste planning authorities are responsible for producing waste plans to support the objectives of the Waste Management Plan for England. As noted above, the Resources and Waste Strategy commits to reviewing the Waste Management Plan for England in 2019 but this timetable may slip.

### **National Planning Policy Framework**

- 1.32 The National Planning Policy Framework (NPPF) was published in February 2019. An update to the plan-making section of the Planning Practice Guidance (PPG) was published in September 2018.
- 1.33 National planning policy for waste is dealt with in a separate document, but the NPPF sets out policies for plan-making which will influence the development of waste policies in Wandsworth's Local Plan. Paragraph 31 states that "the preparation and review of all policies should be underpinned by relevant and up-to-date evidence" which should be "adequate and proportionate, focused tightly on supporting and justifying the

policies concerned, and take into account relevant market signals.” Paragraph 35 sets out the criteria against which Local Plans will be examined. These include:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.34 This waste evidence base focuses on meeting these requirements, including identifying Wandsworth’s objectively assessed waste management needs (positively prepared), identifying an appropriate strategy for Wandsworth’s waste (justified), identifying strategic waste exports from Wandsworth (effective) and ensuring conformity with waste policies (consistent with national policy).

1.35 The main policy requirement affecting waste in the NPPF and PPG is the requirement for planning authorities to produce statements of common ground to provide evidence of progress made through the duty to co-operate. Waste is a cross-border strategic issue that will need to be addressed in statements of common ground with relevant waste planning authorities. When assessing if the Local Plan is sound, the Inspector will look to statements of common ground (SCG) for evidence that cross boundary strategic matters have been “dealt with rather than deferred” (NPPF 35) and that Wandsworth has complied with the duty to co-operate (DtC).

### **National Planning Policy for waste**

1.36 The National Planning Policy for Waste<sup>5</sup> (NPPW), published in 2014, sets out the Government's waste planning policies which all local planning authorities must have regard to when developing local waste plans. The NPPW is supplemented by the Planning Practice Guidance<sup>6</sup> (PPG) section on waste which provides further detail on how to implement the policies.

1.37 The NPPW requires planning authorities to prepare Local Plans which drive waste management up the waste hierarchy (see Figure 1 below).

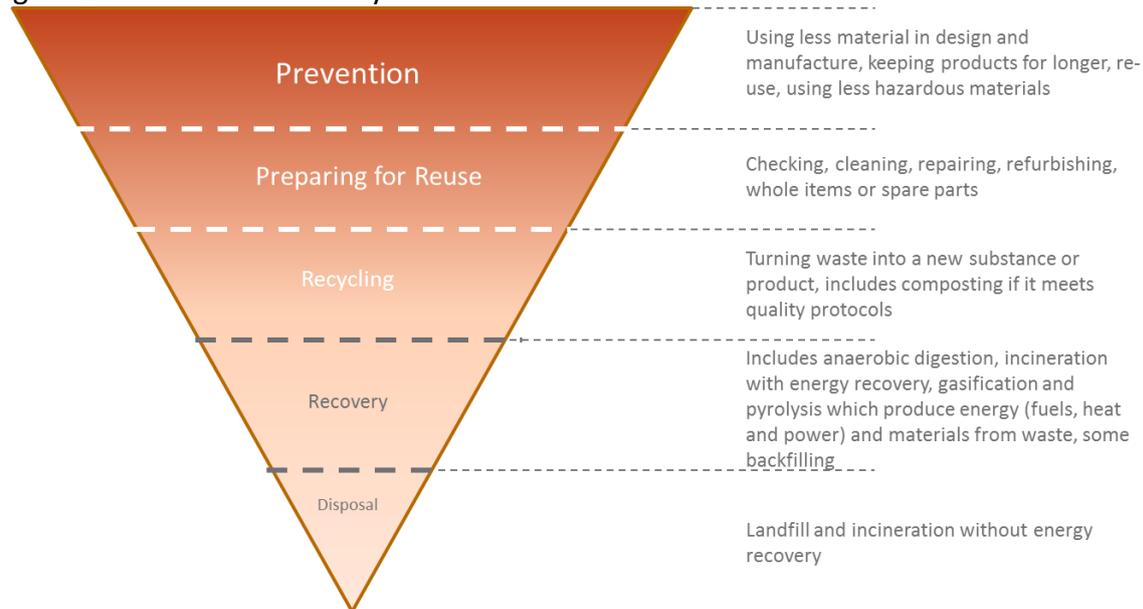
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<sup>5</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/364759/141015\\_National\\_Planning\\_Policy\\_for\\_Waste.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

<sup>6</sup> <https://www.gov.uk/guidance/waste>

Figure 1: The Waste Hierarchy



1.38 Importantly for this waste plan evidence base, the NPPW sets out policies on data and analysis to underpin a proportionate evidence base, establishing the need for waste management facilities, and identifying suitable sites and areas to meet the need in local plans.

1.39 The NPPW states that waste planning authorities should have regard to their apportionments set out in the London Plan when preparing their plans. The NPPW requires that the waste evidence base for Local Plans should include:

- existing waste management capacity;
- waste arisings from within the planning authority area, including imports and exports;
- waste management capacity gaps in total and by particular waste streams;
- forecasts of waste arisings throughout the plan period; and
- waste management capacity required to deal with forecast arisings throughout the plan period.

1.40 This waste plan evidence base includes all these elements.

1.41 The NPPW requires information on existing waste management facilities to include:

- site location details – name of site and operator, address, postcode, local authority, grid reference etc.;
- type of facility – what process or processes are occurring on the site and which waste streams they manage;
- licence/permit details – reference number, tonnage restrictions, waste type restrictions, dates of renewal, etc and status if not yet licensed and permitted;

- capacity information – licensed and permitted throughput by waste type;
- site lifetime or maximum capacity – it is important to record the expected lifetime of facilities and, where appropriate, their total remaining capacity;
- waste sources – origin of wastes managed, broken down by type and location;
- outputs from facility – recovery of material and energy, production and export of residues and the destination of these, where appropriate; and
- additional information – potential of site for increasing throughput, adding further capacity, other waste management uses, etc.

1.42 The site profiles and capacity information provided in this study includes this information.

1.43 NPPW and PPG require waste planning authorities to plan for seven waste streams. These waste streams are:

- Local Authority Collected Waste (LACW)<sup>7</sup> (apportioned by the London Plan)
- Commercial & Industrial waste (C&I)<sup>8</sup> (apportioned by the London Plan)
- Construction, Demolition & Excavation (CD&E)
- Low Level Radioactive waste (LLRW)
- Agricultural waste
- Hazardous waste
- Waste water

1.44 This report sets out existing capacity and identifies capacity gaps for all these waste streams.

1.45 The NPPW requires Local Plans to identify sufficient opportunities to meet the identified needs of their area for the management of waste streams. The London Plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the Plan. The London Plan requires boroughs to provide capacity through facilitating the maximum use of existing facilities. Both the NPPW and London Plan direct new waste facilities towards industrial locations. Paragraph 4 of the NPPW under Identifying Suitable Sites and Areas makes clear that Local Plans can identify suitable areas as well as sites for new or enhanced waste management facilities. The draft new London Plan (July 2019) is aligned with this approach to identifying land. It will therefore be important for Wandsworth to continue to protect industrial land through Strategic Industrial Location (SIL) and Locally Significant Industrial Area (LSIA) designations.

1.46 Waste planning authorities should also identify the broad type or types of waste management facility that would be appropriately located on the allocated site or

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<sup>7</sup> Local Authority Collected Waste (LACW) comprises household waste and other waste collected by the council, such as street sweepings and municipal bins. This waste stream has historically been called 'Municipal' waste.

<sup>8</sup> Also known as business waste

identified area in line with the waste hierarchy and seek opportunities to co-locate waste management facilities together with complementary activities.

- 1.47 The opportunities to meet the identified waste management need, including locations for new facilities, and appropriate types of facilities, is set out in the Land Search section of this report.

### **National Planning Policy Statements**

- 1.48 National Planning Policy Statements (NPS) comprise the Government's objectives for the development of nationally significant infrastructure in a particular sector and include any other policies or circumstances that ministers consider should be taken into account in decisions on infrastructure development. There are three relevant NPSs for waste: NPS for Renewable Energy (2011), NPS for Hazardous Waste (2013) and NPS for Waste Water (2012). There are no known plans to deliver a nationally significant facility for hazardous waste, however the Thames Tideway Tunnel is a Nationally Significant Infrastructure Project (NSIP) for waste water which crosses London, including six shaft sites in Wandsworth. These sites are at Putney Embankment Foreshore, King George's Park, Dormay Street, Falconbrook Pumping Station, Kirtling Street and Heathwall Pumping Station. As part of their Development Consent Order, Tideway have committed to diverting excavated materials away from landfill and reusing, recycling or otherwise putting this waste to beneficial use. Waste water is one of the seven waste streams that Wandsworth needs to plan for and this is discussed at paragraph 4.13.

### **London Environment Strategy**

- 1.49 The Mayor's Environment Strategy was published in May 2018. It contains ambitious targets for waste, including a new London-wide recycling target of 65% municipal (household and business) waste by 2030. This is an ambitious target for Wandsworth and the barriers to increasing household recycling rates in inner London boroughs are well known, for example the high proportion of flatted developments and low number of gardens. Household waste recycling is the responsibility of the Western Riverside Waste Authority (WRWA) and Wandsworth will continue to work with the WRWA to increase recycling. It is more difficult for Wandsworth to directly influence business recycling rates and therefore partnership working with the London Waste and Recycling Board will be key to increasing business waste recycling. A key element of increasing municipal waste recycling is to ensure there is sufficient space for the separation and storage of recyclables for collection and Wandsworth's waste policy and design policy on refuse/recycling storage should include this requirement for new developments.
- 1.50 The Mayor wants London to be a "zero waste city" which means no biodegradable or recyclable waste to landfill by 2026. A negligible amount of Wandsworth's LACW and C&I waste goes to landfill so the focus will be on diverting more recyclable CD&E waste away from landfill.

1.51 The Environment Strategy states that the Mayor does not want any new Energy from Waste plants in London and that modelling suggests that existing and pipeline capacity will be sufficient to manage London's non-recyclable waste. However, Cory's Development Consent Order for new energy from waste facility in Bexley was granted in April 2020 and will add an additional 800,000 tonnes to EfW capacity in London.

## **London Plan**

1.52 Wandsworth's Local Plan and waste policies will need to be in general conformity with the London Plan. At the time of writing, the London Plan is the version published in March 2016.

1.53 A draft new London Plan was published for consultation in November 2017. Wandsworth made comments on the draft, including on the waste policies. The Mayor published early suggested changes to the Draft London Plan in August 2018. Further suggested changes to waste policies were published in March 2019 ahead of the oral examination hearings in front of a panel of Inspectors on waste held on 30<sup>th</sup> April 2019. Consolidated changes to the London Plan were published in July 2019 and included all previously suggested changes and any subsequent alterations as a result of the public hearings. The Panel of Inspectors' report was published in October 2019, with publication of the final plan in early 2020.

1.54 The Panel Report does not recommend any further changes to waste policies beyond those already proposed in the 'consolidated changes' version of the draft new London Plan published in July 2019. Some of the waste recycling targets in the London Plan 2016 have already been superseded by those in the Mayor's Environment Strategy. Given the advanced stage of the new London Plan, this waste evidence base is aligned to the policies and targets contained in the 'Intend to Publish' draft London Plan (December 2019) rather than the London Plan (March 2016).

1.55 The draft London Plan (December 2019) states that London should manage as much of its waste within its boundaries as practicable, aiming to achieve waste net self-sufficiency by 2026 in all waste streams except for excavation waste. To meet this aim, the plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the plan and to plan for those waste streams not apportioned by the London Plan. Wandsworth's waste policy will need to identify existing capacity and sufficient land to meet the London Plan apportionment targets. Wandsworth's apportionment target is 274,000 tonnes by 2036.

1.56 The draft London Plan incorporates targets set out in the Mayor's Environment Strategy, including London-wide target of 65% municipal (household and business) waste by 2030. This breaks down as 50% of LACW by 2025 and 75% of C&I by 2030. It also has targets of 95% reuse/recycling/recovery of construction and demolition waste (C&D) and 95% of excavation waste should be used for beneficial use.

1.57 The draft London Plan introduces a new requirement for referable applications<sup>9</sup> to include a “Circular Economy Statement” to set out how much waste the proposed development is expected to generate and where it will be managed. This will assist Wandsworth in monitoring these targets. Further guidance on the Circular Economy Statement is currently being developed. The London Plan supports boroughs who adopt lower thresholds for Circular Economy Statements in their Local Plans. However, The GLA has not yet issued any guidance on Circular Economy Statements. Further information, training and guidance will be available once the London Plan is published in 2020 and the policy is tested. Additional training and resources would be needed by Wandsworth’s case officers to assess planning applications between the thresholds of ‘major’ and ‘referable’. It is therefore recommended that this option is revisited after the policy on Circular Economy Statements has been put into practice by the GLA.

1.58 The requirement for boroughs to identify specific sites for new waste facilities has been replaced with “allocate sufficient sites, identify suitable areas, and identify waste management facilities” which updates the London Plan to be in accordance with National Planning Policy for Waste. There is a focus on SIL and LSIS for new sites which will provide the boroughs with an initial search criteria when identifying land, if required, to meet any identified capacity gap.

1.59 The draft London Plan makes clear that all existing waste sites should be safeguarded and retained in waste use. Existing waste sites are defined as those with planning permission for waste use or those with an Environment Agency permit. A full list of safeguarded waste sites in Wandsworth is shown in Table 2.2 below. Policy S18 states that the waste management capacity of existing sites should be optimised.

1.60 The London Plan requires compensatory capacity elsewhere in London if a waste site is redeveloped for another use. Some boroughs are extending this policy to require replacement waste capacity within their area to ensure that existing capacity is retained. Wandsworth could also consider this policy approach. Compensatory capacity must be at or above the same level of the waste hierarchy of that which is lost, and that any loss of hazardous waste capacity must be replaced with hazardous waste capacity. Waste sites can only be released without re-providing capacity if it can be demonstrated that there is sufficient capacity elsewhere in London and the target of achieving net self-sufficiency is not compromised.

1.61 The London Plan requires boroughs with surplus capacity to share this with boroughs facing a shortfall in capacity before considering site release. The draft also acknowledges that it may not always be possible for boroughs to meet their apportionment within their boundaries and in these circumstances boroughs will need

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<sup>9</sup> Referable applications include those for developments providing 150 residential units, other types of development of 20,000sq.m in central London or 15,000sq.m outside Central London, developments 25m high adjacent to the Thames or 30m high elsewhere in London.

to agree the ‘transfer of apportioned waste’. However, no further detail is provided on this.

1.62 The London Plan provides a methodology to calculate compensatory capacity which is “the maximum throughput achieved over the last five years should be used”. This Waste Evidence Base uses this methodology to estimate Wandsworth’s existing capacity (see section 2).

1.63 Only capacity which “manages” waste can be counted towards Wandsworth’s existing capacity. This means transfer stations which store waste for onward journey cannot be counted. The London Plan states that waste is deemed to be managed if the following activities take place

- waste is used for energy recovery
- the production of solid recovered fuel (SRF), or it is high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition as a minimum<sup>131</sup> which is destined for energy recovery
- it is sorted or bulked for re-use (including repair and re-manufacture) or for recycling (including anaerobic digestion)
- It is reused, or recycled (including anaerobic digestion)

1.64 This Waste Evidence Base uses this definition to assess the existing capacity in Wandsworth.

1.65 The London Plan includes the Agent of Change principle (Policy D12) and makes clear that developments adjacent to waste management sites should be designed to minimise the potential for disturbance and conflicts of use.

1.66 Wandsworth is identified as a ‘Provide Capacity’ borough for industrial floorspace capacity. The ‘Provide Capacity’ category are those where strategic demand for industrial, logistics and related uses is anticipated to be the strongest. They should seek to deliver intensified floorspace capacity in either existing and/or new locations accessible to the strategic road network and in locations with potential for transport of goods by rail and/or water.

1.67 Part G of London Plan Policy D4 Housing quality and standards requires housing to be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) food waste as well as residual waste.

**WANDSWORTH WASTE POLICY RECOMMENDATION:**

Reflect the London Plan waste policies and targets into the approach to waste for Wandsworth, including circular economy principles.

Identify existing waste sites, and the amount and type of waste managed. Ensure this capacity is protected through safeguarding in the Policies Map and that the ability of the site to operate is protected through the agent of change principle.

Consider extending the policy for compensatory capacity to require waste capacity re-provision within Wandsworth.

Include the requirement for compensatory capacity to be at or above the same level of the waste hierarchy of that which is lost.

Update the policies map to identify and safeguard all existing waste sites and identify locations which are suitable for new waste facilities to provide additional capacity to meet apportionment targets.

Include cross-reference to design policies for sufficient space for the separation and storage of recyclables, food waste and residual waste for collection to help increase recycling in the Borough.

### **The London Industrial Land Supply and Economy Study 2015**

1.68 The London Industrial Land Supply and Economy Study 2015 (March 2016) was prepared by AECOM for the Greater London Authority (GLA). It includes information about industrial land in Wandsworth, vacancy rates and business churn. Wandsworth falls in the Wandle Valley property market area. Appendix C of the Study sets out industrial land in Wandsworth for each broad type of use in 2015.

1.69 Since this report was written, a more up to date Employment Land and Premises Study (2020) has been prepared for Wandsworth. Comparing the two reports shows that between 2015 and 2020 the amount of industrial land has reduced in Wandsworth, from a total 157.6ha to 133.6ha, and for core industrial uses it has reduced from 85.7ha of land to 68.9ha.

1.70 The Study estimates that 3.8ha of land is in waste management and recycling use which is well below the 6.85ha of land identified as being in waste use in this report (see Table 4.3 below). The Study also estimates there is 0.3ha of vacant industrial land and 0.4ha of land with vacant buildings, totalling 0.7ha. This is also well below the 1.4ha of vacant land identified by Wandsworth's ELPS (2020).

### **Local Policies**

1.71 Wandsworth's Local Plan and supporting evidence base documents are discussed below.

## **Core Strategy**

1.72 Wandsworth's Core Strategy was adopted in March 2016. Policy PL7 deals with Land for Industry and Waste. However, the Local Plan Employment and Industry Document was adopted in December 2018 and updates those parts of the adopted Local Plan (2016) which cover employment and industry policy.

## **Development Management Policies Document**

1.73 Wandsworth's Development Management Policies document (DMPD) was adopted in March 2016. This document is under review as part of the Local Plan Review. The DMPD includes three waste policies which were incorporated into the Local Plan Employment and Industry Document in December 2018. Waste policy EI8 in the Local Plan Employment and Industry Document (discussed below) supersedes policies DMI5, DMI6 and DMI7 in the Development Management Policies document..

## **Local Plan Employment and Industry Document**

1.74 Wandsworth's Local Plan Employment and Industry Document (LPEID) was adopted in December 2018 and updates those parts of the adopted Local Plan (2016) which cover employment and industry policy, including waste.

1.75 The analysis of the amount of industrial land in the Borough has now been superseded by the Employment Land and Premises Study (ELPS) prepared in 2020 (see below). For example, the amount of land in industrial use the borough has reduced from 141.9 hectares in the LPEID to 133.6ha in the ELPS, and land in core industrial uses has reduced from 78.9ha to 68.9ha.

1.76 Policy EI3 identifies Wandsworth's strategic reservoir of industrial land, and safeguards this land for industrial uses. The safeguarded industrial areas comprise:

- Queenstown Road, Battersea Strategic Industrial Location
- Old Sergeant Locally Significant Industrial Area
- Kimber Road Locally Significant Industrial Area
- Lydden Road Locally Significant Industrial Area
- Thornsett Road Locally Significant Industrial Area
- Summerstown Locally Significant Industrial Area

1.77 Policy EI3 states "The SIL and LSIA's will be the main focus of land for industry, logistics, storage, warehousing, and waste management".

1.78 Policy EI6 identifies uses appropriate in Strategic Industrial Locations (SIL) and Significant Industrial Areas (LSIA). These include:

- Light industry (B1c)

- General industry (B2)
- Storage and distribution (B8)
- Appropriate sui generis uses that relate to the industrial nature of the area

1.79 Generally, waste uses fall under the B use class category or sui generis, the SIL and LSIAs are appropriate, in principle, for waste uses.

1.80 The London Plan identifies Wandsworth as needing to provide industrial floorspace capacity in the borough because strategic demand for industrial, logistics and related uses is anticipated to be the strongest. This could be achieved by intensification of some industrial sites and LPEID policy EI2 identifies Economic Use Intensification Areas.

1.81 Policy EI8 deals specifically with waste. The focus of the policy is to meet the Borough's apportionment target, to protect the operational ability and capacity of existing facilities and direct new facilities to the sites identified for waste management in the Site Specific Allocations Document (SSAD) (see below). This policy will need to be updated in light of more recent policy and the Waste Evidence Base, for example planning for seven waste streams not just apportionment and directing new facilities to designated industrial areas.

1.82 Policy EI8 also provide criteria to assess planning applications for new waste facilities. These criteria are all covered in the NPPW and the London Plan. When reviewing policy EI8, Wandsworth should consider either referring to these criteria for assessing planning applications for new waste facilities, or amending the wording in Wandsworth's policy to better reflect that in national and regional policy.

### **Wandsworth's Site Specific Allocations Document**

1.83 Wandsworth's Site Specific Allocations Document (SSAD) was adopted in March 2016. This document is under review as part of the Local Plan Review. The SSAD identifies six site allocations for waste uses. These are:

- 6. Cringle Dock, Nine Elms, SW8
- 33. Pensbury Place Waste Management Site, SW8
  - European Waste Recycling
  - Biffa Waste Services
  - Cory Environmental Waste Transfer Site
- 50. Cory Environmental Materials Recycling Facility, Smugglers Way, SW18
- 51. Western Riverside Waste Transfer Station, SW18
- 96. Cappagh waste recycling facility, The Willows, Riverside Way, SW17
- 99. D. Goldsmith Ltd Waste Transfer Station, 2 Bendon Valley, SW18

1.84 Appendix 2 of the SSAD includes a map of waste management sites in Wandsworth and the capacity they contribute towards managing apportioned waste and CD&E waste. It concludes that the identified waste sites will provide sufficient capacity to meet

Wandsworth's apportionment targets over the plan period. This information will need to be updated as part of the Local Plan Review.

**WANDSWORTH WASTE POLICY RECOMMENDATION:**

Update waste site safeguarding allocations and information in light of new policies and data.

Review existing policy EI 8 in light of more recent policies in the NPPW, London Plan and findings in this Evidence Base, including planning for seven waste streams, identifying locations suitable for new waste facilities and assessment criteria for new waste facilities.

### **Employment Land and Premises Study**

- 1.85 The Employment Land and Premises Study (ELPS) 2020 was prepared for Wandsworth by AECOM to support the Local plan review and analyses supply and demand for industrial land in Wandsworth. The ELPS finds there is a total of 133.6ha of land currently in industrial use in Wandsworth, of which 68.9ha of land is occupied by core industrial and warehousing uses and 1.4ha is vacant.
- 1.86 The ELPS considers demand for waste management as part of the calculation of net requirement for land and floorspace. Waste management falls within the 'wider industrial uses' category as defined in the London Plan. Table 7.2 Supply/Demand Balance for Industrial Land 2019 to 2034 identifies an additional demand for 2.1ha for waste facilities, reflecting the findings of this Waste Evidence Base.
- 1.87 The ELPS finds that between 2019 and 2034, the analysis predicts a net requirement for 8.6 hectares of industrial land. This is due to forecast demand being positive and the vacancy rate for industrial land which is currently very low in the Borough. To meet forecast demand of core industrial uses, supply would need to increase by 5.5 hectares. This is due to increases in demand for B1b/c and B8 space as well as 2.1ha of land to meet its waste requirements and 1ha of land to meet the additional surplus land required (5% of the Borough's stock) to enable the efficient churn of occupiers in the industrial land market.
- 1.88 The Study recommends Wandsworth's Local Plan ensures the retention of existing industrial land, including maintaining the protection of SIL and LSIA's against conversion to other uses.

## **Policies Map**

1.89 Wandsworth's Policies Map does not current identify safeguarded waste sites and it is recommended this is done as part of the Local Plan Review.

## **Refuse and Recyclables in Developments SPD**

1.90 The Refuse and Recyclables in Developments SPD was adopted in February 2014. It provides detailed guidance for developers on Wandsworth Council's local requirements for the provision of space and related facilities for the storage and collection of waste in developments. It adds further definition to the Council's Development Management Policies Document (DMPD) and Site Specific Allocations Document (SSAD). The Document relates to Wandsworth's role as a waste collection authority and the focus is on household and commercial waste. The references to the existing policy framework and targets is somewhat out of date, but this should not affect the overall purpose of the document to improve Wandsworth's waste collection service.

## **Wandsworth Environment and Sustainability Strategy**

1.91 In 2019 Wandsworth published an Environmental Ambition Statement which was followed in January 2020 by the Wandsworth Environment and Sustainability Strategy (WESS) Action Plan. The Action Plan includes measures and targets for reducing waste, increasing recycling and reducing emissions from waste collection processes. There is a commitment to review the Council's SPD relating to refuse to ensure maximisation of provision for greater capture of recycling materials.

1.92 The Action Plan seeks to "Develop a programme to review refuse and recycling provision within recent housing developments, to work with agents and residents to encourage greater capacity for recycling and replacement of residual bins." There is an opportunity for the Local Plan to provide policy support for this, in particular requiring sufficient space within residential units for the separate storage of recyclables, food waste and residual waste before disposal in communal refuse bins.

## **Western Riverside Waste Technical Paper**

1.93 In 2016 the Western Riverside authorities of Lambeth, Kensington & Chelsea, Hammersmith & Fulham, Wandsworth and the Old Oak and Park Royal Development Corporation (OPDC) agreed to work together to prepare a joint waste technical paper (WTP). The purpose of this was to provide an up to date evidence base to support waste planning.

1.94 The Western Riverside Waste Technical Paper was published in January 2017. The WTP identified existing waste capacity for meeting apportioned waste and other types of waste, forecasts waste needs to 2036 and identified the capacity gap for all waste streams. It identified capacity gaps for individual boroughs and also for the combined

Western Riverside area. It used data from 2015 which was the most up-to-date available at the time the study was started.

1.95 Since the WTP was published, there have been policy changes and three years of new data (2016-2018) has become available. This affects the figures for waste arisings, existing capacity, imports/exports and the capacity gap. This waste evidence base updates the majority of information contained in the WTP with the exception of estimates for the throughput of exempt facilities which are not included in the WDI and so the capacity estimates in the WTP have not changed. The information provided for the future needs for agricultural waste, Low Level Radioactive Waste and waste water are also still valid.

1.96 Given the changes to policies and data since the WTP was prepared, it no longer includes the “best available data and information” required by the NPPW and should not be used to support Wandsworth’s Local Plan.

## 2. Waste management in Wandsworth

### Waste arisings

2.1 The main types of waste arising in Wandsworth are household, business and construction waste. Waste arisings vary from year to year. Wandsworth produces around 100,000 tonnes of local authority collected waste<sup>10</sup> a year and around 150,000 tonnes of business waste<sup>11</sup>.

2.2 Wandsworth is one of four London boroughs (along with Wandsworth, Hammersmith & Fulham and Kensington & Chelsea) for which the Western Riverside Waste Authority (WRWA) is the statutory waste disposal authority for household waste. A thirty year Waste Management Service Agreement (WMSA) was established between WRWA and Cory Environmental Ltd to dispose of WRWA waste, commencing in October 2002 and ending in 2032. Some of Wandsworth’s household waste is managed within the borough, with recyclables going to a Materials Recovery Facility (MRF) at Smugglers’ Wharf. Only around 22% of Wandsworth’s Local Authority Collected Waste is recycled. Residual (“black bag”) waste is taken to Cringle Dock Transfer Station in the borough and then transported down river to the Belvedere energy recovery facility in the London Borough of Bexley.

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<sup>10</sup> Source: [Local authority collected waste generation from April 2000 to March 2019 \(England and regions\) and local authority data](#) (Defra, 2019)

<sup>11</sup> Estimates taken from GLA Excel spreadsheet file ‘lprwasteproject.xlsx’ referred to in *Waste Forecasts & Apportionments – Task 1* (SLR, March 2017)

2.3 The amount of Wandsworth’s CD&E waste managed at waste facilities varies from year to year<sup>12</sup> (not including material recycled on site before it becomes waste). In 2018 Wandsworth’s C&D waste was around 85,000 tonnes, down from 92,000 in the previous two years while E waste was just under 140,000 tonnes<sup>13</sup> in 2018 and over 400,00 tonnes at a peak in 2016. This reflects development taking place in the Vauxhall/ Nine Elms/ Battersea Opportunity Area which is creating a substantial amount of new development, including the Northern Line extension, and with it a substantial amount of CD&E waste.

2.4 The table below shows that in recent years Wandsworth has met the London Plan target of 95% recycling of C&D waste. The table also shows that a significant amount of excavation waste is going to landfill, although it is not clear if this waste is being put to beneficial use such as restoration as this is difficult to measure.

Table 2.1: Management routes for C&D and E waste

Waste type	Management	2014	2015	2016	2017	2018
C&D	Treatment / Recycling	41,059 (87%)	49,371 (80%)	81,853 (89%)	89,731 (97%)	84,122 (99%)
	Transfer	3,906	3,985	2,187	1,125	830
	Landfill	2,303	8,231	636	1,188	143
	On/In Land	0	0	7,559	0	18
	<b>Total</b>	<b>47,267</b>	<b>61,586</b>	<b>92,234</b>	<b>92,043</b>	<b>85,112</b>
Excavation	Treatment / Recycling	35,200	19,121	26,504	10,059	4,994
	Transfer	35,036	101,874	108,802	22,950	29,318
	Landfill	152,581 (64%)	137,789 (51%)	265,405 (66%)	182,406 (83%)	72,170 (52%)
	On/In Land	16,160	12,265	111	5,339	33,105
	<b>Total</b>	<b>238,977</b>	<b>271,049</b>	<b>400,822</b>	<b>220,754</b>	<b>139,587</b>

Source: WDI 2014-2018. Chapter 17 170504 for Excavation Waste the remainder for C&D waste

2.5 Hazardous waste is a component part of the other waste streams. Arisings vary each year but have been between 13,500 tonnes and 35,000 tonnes over the last five years<sup>14</sup>. The majority of hazardous waste arising in Wandsworth is exported to specialist facilities outside London.

2.6 A small amount of low level radioactive waste (around 520,000 MBq) arises in Wandsworth and is disposed of through waste water and air. There is no agricultural

<sup>12</sup> Source: Waste Data Interrogator

<sup>13</sup> The European Waste Category (EWC) Chapter 17 has been used as a proxy for CD&E waste arisings in Wandsworth, with 170504 representing the E component and the remainder representing the C&D component.

<sup>14</sup> Source: Hazardous Waste Data Interrogator 2014-2018 (hazardous waste recorded as arising in Wandsworth)

waste arising in Wandsworth. Wandsworth’s wastewater and sewage sludge is treated at the sewage treatment works in Beckton, LB Newham.

### 3. Waste imports and exports

3.1 Local planning authorities have a duty to cooperate with each other on strategic matters that cross administrative boundaries. Exports of waste from one waste planning authority to another is a strategic cross-boundary matter and is an important consideration in assessing the effectiveness of the Local Plan. An Inspector will test Wandsworth’s Local Plan against the criteria in paragraph 35 of the National Planning Policy Framework, and criteria c) is particularly relevant to waste planning because it requires the plan to be “based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground”. It is therefore important to understand the destination of Wandsworth’s waste exports and to understand any issues which could prevent similar amounts of waste being exported in the future.

#### Summary of waste exports

3.2 The primary source of data on waste exports is the Environment Agency’s Waste Data Interrogators (WDIs). The WDIs hold information including the amount of waste received at a particular site and the origin of that waste. However, the accuracy of this data is not perfect and the limitations are well known, for example it doesn’t include waste received at energy from waste facilities. Notwithstanding this, it is the best available data source for movements of waste and is used as the starting point for co-operation with other waste planning authorities receiving Wandsworth’s waste.

3.3 Table 3.1 summarises the type of waste recorded by the Waste Data Interrogator (WDI) and Hazardous Waste Data Interrogator (HWDI) as being exported from Wandsworth over the last five years. The vast majority of waste recorded as being exported is CD&E waste. Significant amounts of hazardous waste are also exported.

Table 3.1: Exports from Wandsworth by waste type 2014-2018 (all waste streams)

Waste type	2014	2015	2016	2017	2018
LACW/C&I	16,470	39,389	9,663	7,690	9,459
CDE	289,409	329,536	477,023	292,586	226,473
Hazardous (WDI)	802	2,637	2,190	8,128	4,892
<b>Total exports</b>	<b>306,682</b>	<b>371,562</b>	<b>488,876</b>	<b>308,404</b>	<b>240,824</b>
Hazardous (HWDI)	28,045	13,674	27,981	34,851	15,260

Source: Hazardous Waste Data Interrogator and Waste Data Interrogator 2014-2018

3.4 A specific example of the limitations of the WDI pertinent to Wandsworth is that the WDI data for 2018 shows Cringle Dock waste transfer station in Wandsworth received 289,565 tonnes of waste but the origin is recorded as “South London”. As mentioned above, all Wandsworth’s residual (“black bag”) waste goes to Cringle Dock before its onward journey down the river to the Belvedere energy recovery facility in Bexley, so some of this waste must have come from Wandsworth. However, as the WDI doesn’t record the origin of waste received at Cringle Dock by local authority, it is not possible to accurately say how much of Wandsworth’s waste is transferred through Cringle Dock and eventually on to Bexley using the WDI. Similarly, Environment Agency incinerator returns show the origin of waste received at the Belvedere energy recovery facility in Bexley as “London” or “Greater London” so no additional details are available through this data source.

3.5 Data for local authority collected waste (LACW) are also collected by local authorities and collated by Defra so it is possible to gather more information on this waste stream and combine this with knowledge about where it is managed to support duty to co-operate discussions. However, information on movements of C&I and CD&E waste relies on the WDI and it is acknowledged that not all waste exported from Wandsworth (and shown in the tables below) is captured by this data source.

3.6 As mentioned above, neither the WDI nor the incinerator returns record how much of Wandsworth’s local authority collected waste exports are transferred through Cringle Dock to Belvedere energy recovery facility. However, the government publishes annual reports on local authority collected waste<sup>15</sup> (LACW) and it is possible to make assumptions based on this data. Table 3.2 shows how much LACW is recycled and how much is not recycled.

Table 3.2: LACW management 2014/15-2018/19 (tonnes)

	2014/15	2015/16	2016/17	2017/18	2018/19
LACW recycled	20,364	21,212	21,822	21,509	22,309
LACW not recycled	82,157	83,111	82,638	80,915	79,854
Total	102,521	104,324	104,460	102,424	102,163

Source: statistical data set ENV18 - Local authority collected waste: annual results tables

3.7 Wandsworth’s recyclables are managed at the Materials Recovery Facility (MRF) at Smugglers’ Wharf in Wandsworth and residual (“black bag”) waste is transferred through Cringle Dock and transported down river to the Belvedere energy recovery facility in the London Borough of Bexley. It can therefore be assumed that the ‘recycled’ and ‘non-recycled’ figures in Table 3.2 are approximately the amount of waste managed at each of these facilities.

<sup>15</sup> [Statistical data set ENV18 - Local authority collected waste: annual results tables](#)

3.8 Table 3.3 uses WDI data and shows how much of Wandsworth’s waste exports were managed within and outside of London. It should be noted that where waste is taken to a transfer station, it is not always possible to identify its onward destination due to the limitations of the WDI. While export figures to landfill seem relatively small, it is possible that CD&E waste which travels through transfer stations in London is finally disposed of to landfill outside of London.

3.9 Table 3.3 shows that over the last five years waste exports have risen to a peak in 2016 and have been decreasing since this time. More waste exports were managed elsewhere in London up to 2016 and since that year a higher proportion of Wandsworth’s waste exports are managed outside London. However, these figures do not include residual waste exports to Belvedere EfW in Bexley which would substantially raise the proportion of waste exports managed within London.

Table 3.3: Exports by facility type and destination 2014-2018 (all waste streams)

Destination facility type		2014	2015	2016	2017	2018
Treatment / Recycling	<b>Total</b>	<b>67,062</b>	<b>67,301</b>	<b>98,480</b>	<b>91,325</b>	<b>102,642</b>
	In London	62,898	52,321	61,834	73,027	55,150
	Outside London	4,164	14,979	36,646	18,297	47,492
Transfer	<b>Total</b>	<b>40,152</b>	<b>108,398</b>	<b>116,055</b>	<b>26,867</b>	<b>32,464</b>
	In London	15,376	103,704	69,739	15,193	2,497
	Outside London	24,776	4,695	46,316	11,674	29,967
Landfill	<b>Total</b>	<b>157,195</b>	<b>146,097</b>	<b>266,255</b>	<b>184,873</b>	<b>72,596</b>
	In London	79,264	36,182	192,047	37,104	22,941
	Outside London	77,931	109,915	74,208	147,769	49,654
On/In Land Use of Waste	<b>Total</b>	<b>20,124</b>	<b>12,265</b>	<b>8,087</b>	<b>5,339</b>	<b>33,122</b>
	In London	3,964	0	7,640	0	9,252
	Outside London	16,160	12,265	447	5,339	23,870
<b>Total exports</b>		<b>284,533</b>	<b>334,061</b>	<b>488,876</b>	<b>308,404</b>	<b>240,824</b>
% managed elsewhere in London		57%	58%	68%	41%	37%
% managed outside London		43%	42%	32%	59%	63%

Source: Waste Data Interrogator 2014-2018

3.10 Table 3.4 uses HWDI data and shows the amount of hazardous waste exported from Wandsworth over the last five years, and how much of this waste was managed in and outside of London. The majority of hazardous waste is exported outside of London to specialist facilities to be managed.

Table 3.4: Exports by facility type and destination 2014-2018 (hazardous waste only)

Destination facility type		2014	2015	2016	2017	2018
Treatment / Recovery	<b>Total</b>	10,772	5,360	16,295	28,158	12,773
	In London	929	3,746	10,079	22,908	1,260
	Outside London	9,843	1,614	6,216	5,250	11,513
Transfer	<b>Total</b>	4,726	6,727	6,157	3,155	986
	In London	751	707	602	430	331
	Outside London	3,975	6,020	5,555	2,722	655
Incineration	<b>Total</b>	173	356	11	13	9
	In London	36	22	11	13	8
	Outside London	137	334	6	0	1
Landfill	<b>Total</b>	12,372	1,230	5,512	3,514	1,492
	In London	0	0	0	0	0
	Outside London	12,372	1,230	5,512	3,514	1,492
Other	<b>Total</b>	0	0	0	17	1
	In London	0	0	0	0	0
	Outside London	0	0	0	17	1
<b>Total exports</b>		<b>28,045</b>	<b>13,674</b>	<b>27,981</b>	<b>34,851</b>	<b>15,260</b>
% managed elsewhere in London		6%	33%	38%	67%	10%
% managed outside London		94%	67%	62%	33%	90%

Source: Waste Data Interrogator 2014-2018

3.11 For the duty to co-operate it is important to establish the destination of ‘significant’ movements of waste exports from Wandsworth. Wandsworth’s waste exports which leave London are received in the wider south east (WSE) region. It is therefore appropriate to use the wider south east (WSE) thresholds to indicate ‘significant’ waste movements. These thresholds were agreed at the South East Waste Planning Advisory Group (SEWPAG) meeting of 10<sup>th</sup> April 2014 and the East of England Waste Technical Advisory Board (EoEWTAB) meeting of meeting of 3<sup>rd</sup> April 2014. The thresholds are:

- 2,500 tpa non-hazardous waste (LACW and C&I)
- 5,000 tpa inert waste (CD&E)
- 100 tpa hazardous waste

3.12 It is important to be clear that some of Wandsworth’s waste will continue to be exported throughout the plan period due to existing contracts (for example for household waste) or because Wandsworth does not have a full range of facilities (for example hazardous, energy from waste or landfill). However, in order that Wandsworth contributes to London’s target for net self-sufficiency the Local Plan still needs to plan for capacity to meet the equivalent of Wandsworth’s waste management needs (see section 4).

3.13 It is therefore important to demonstrate that Wandsworth’s waste exports can continue. Waste Planning Authorities (WPAs) who have received Wandsworth’s waste over the past five years are set out below. Data on waste exports has been separated by type of waste: LACW and C&I (apportioned) waste, CD&E waste and hazardous waste.

3.14 Table 3.5 shows ‘significant’ LACW and Commercial & Industrial waste exports over 2,500tpa over the last five years sourced from the Environment Agency’s Waste Data Interrogator (WDI). The WDI groups these two waste streams together as “HIC” (household, industrial and commercial) and it is therefore not possible to say what proportion of the waste is LACW or C&I. However, the WDI does not include information for energy from waste facilities and it is clear that the WDI figures for Wandsworth do not include the residual waste which is exported to Belvedere EfW in Bexley. For completeness, Table 3.5 includes an additional row showing the amount of LACW not recycled and assumed to be exported to the Belvedere EfW in Bexley (see Table 3.2). Further details about which sites these exports are received at is set out in Appendix B.

Table 3.5: LACW and C&I waste exports over 2,500tpa from Wandsworth 2014-2018 (tonnes)

WPA	2014	2015	2016	2017	2018
East London (Havering)	4,294	6,855	210	21	0
West Sussex	0	3,957	4,332	3,608	5,047
<b>Total LACW/C&amp;I exports</b>	<b>9,614</b>	<b>14,477</b>	<b>9,663</b>	<b>7,690</b>	<b>9,459</b>
Wandsworth’s LACW/C&I managed in Wandsworth	6,924	25,039	22,988	23,627	27,325
Wandsworth’s LACW managed in Bexley	82,157	83,111	82,638	80,915	79,854

Source: Waste Data Interrogator 2014-2018 and Defra

### Inert (CD&E) waste exports

3.15 Table 3.6 shows significant Inert (CD&E) waste exports over 5,000tpa over the last five years. The spike in inert waste exports in 2016 is probably due to the current construction of the Northern Line extension and Thames Tideway Tunnel and this waste is transferred on elsewhere. Further details about which sites these exports are received at is set out in Appendix B.

Table 3.6: Inert (CD&E) waste exports over 5,000tpa from Wandsworth 2014-2018 (tonnes)

WPA	2014	2015	2016	2017	2018
East London (Havering)	100,791	38,448	201,473	44,207	34,590
South London (Merton)	10,187	5,136	6,577	10,526	10,386
Bucks	5,585	3,914	2,381	1,846	1,381
Essex	33	5,697	2,480	6,559	3,647
Greenwich	29,058	31,480	48,685	56,617	38,344
Hampshire	244	42	5,893	634	387
OPDC (Ealing)	3,083	100,663	63,400	1,172	102

WPA	2014	2015	2016	2017	2018
Oxon	0	0	1,651	3,496	879
Slough	848	4,635	3,802	9,657	42
Surrey	62,655	72,657	82,896	60,602	44,092
Thurrock	44,879	40,595	46,383	52,017	82,415
West London (Hillingdon)	3,882	5,685	7,761	11,295	2,400
Windsor & Maidenhead	0	0	0	30,960	4,410
<b>Total CD&amp;E exports</b>	<b>274,124</b>	<b>316,372</b>	<b>477,023</b>	<b>292,586</b>	<b>226,473</b>
Wandsworth's CDE managed in Wandsworth	16,028	14,620	15,561	13,761	11,792

Source: Waste Data Interrogator 2014-2018

## Hazardous waste exports

3.16 There are two sources of data for hazardous waste exports. The Hazardous Waste Data Interrogator, which provides more accurate information on the amounts and type of waste but not the destination, and the Waste Data Interrogator which includes the destination facility, but is less accurate about the quantities of waste. Table 3.7 provides information from both data sources.

3.17 The main types of hazardous waste arising is in the 'C&D Waste and Asbestos', 'Oil and Oil/Water Mixtures' and 'Healthcare' categories. Table 3.7 shows the main recipients of Wandsworth's hazardous waste are in London and the wider south east.

Table 3.7: Hazardous waste exports over 100tpa from Wandsworth 2014-2018 (tonnes)

Source: HWDI

WPA	Description	Source	2014	2015	2016	2017	2018
(Cambridgeshire &) Peterborough	Mainly C&D Waste and Asbestos	HWDI	217	912	834	1,424	2,538
	Thornhaugh Landfill Site	WDI	0	18	0	24	31
Derbyshire	Mainly Not Otherwise Specified	HWDI	251	200	375	244	103
	Norwood Recycling Centre	WDI	4	0	0	0	-
Dudley	N/A	HWDI	0	0	2,280	0	0
	N/A	WDI	-	-	-	-	-
East London (Havering and Newham)	Mainly C&D Waste and Asbestos	HWDI	379	3,237	10,017	22,500	811

WPA	Description	Source	2014	2015	2016	2017	2018
	Waste Transfer Station, Silvertown	WDI	0	0	0	24	39
	Williams Environmental Management	WDI	44	11	32	-	-
Greenwich	Mainly Oil and Oil/Water Mixtures	HWDI	81	83	109	125	126
	N/A	WDI	-	-	-	-	-
Hammersmith and Fulham	Mainly Municipal and Similar Commercial Wastes	HWDI	452	469	399	479	473
	N/A	WDI	-	-	-	-	-
Hertfordshire	Mainly Oil and Oil/Water Mixtures	HWDI	31	41	226	74	37
	Redbournbury Treatment Plant	WDI	35	16	15	41	8
Kent	Mix of different waste types	HWDI	1,143	895	1,147	1,042	1,201
	Larkfield Clinical Waste Facility	WDI	30	126	140	60	81
	Safetykleen U K	WDI	0	0	20	80	6
	Sweeep Kuusakoski Ltd	WDI	0	0	16	16	525
	Unit D2 Springhead Enterprise Park	WDI	0	0	1	4	4
Medway	Mainly Healthcare	HWDI	928	859	1,524	1,495	1,363
	Rochester Clinical Waste	WDI	352	772	1,435	1,417	1,429

WPA	Description	Source	2014	2015	2016	2017	2018
	Treatment Facility						
	Eco-oil Ltd	WDI	1	1	0	0	-
	Kingsnorth Oil	WDI	8	25	0	0	-
North London (Enfield)	Mainly Healthcare	HWDI	512	513	7	6	8
	Chase Farm Clinical Waste Treatment Facility	WDI	0	579	0	0	-
Northamptonshire	Mainly C&D Waste and Asbestos	HWDI	7,269	5,018	6,892	2,238	74
	East Northants RM Facility	WDI	236	1,554	397	1,972	-
Nottinghamshire	Mainly Oil and Oil/Water Mixtures	HWDI	41	66	98	105	101
	N/A	WDI	-	-	-	-	-
Sandwell	Mix of different waste types	HWDI	28	5	12	2	2,616
	Edwin Richards Quarry - Soil Treatment Centre	WDI	0	0	0	4,431	1,429
	Wednesbury WM Resource Centre	WDI	0	0	0	1	-
	MTB (Midlands) Ltd	WDI	21	0	0	0	-
Staffordshire	Mainly C&D Waste and Asbestos	HWDI	5	8	198	12	7
	P R M Green Technologies Ltd	WDI	0	1	9	4	2
	Stone Computers Limited	WDI	4	4	9	2	4

WPA	Description	Source	2014	2015	2016	2017	2018
Surrey	Mainly C&D Waste and Asbestos	HWDI	15,585	303	2,422	4,557	60
	Infinet House	WDI	0	0	9	1	0
	Redhill Landfill (North East Quadrant)	WDI	7	0	0	0	-
Wiltshire	Mainly C&D Waste and Asbestos	HWDI	95	17	681	9	2
	N/A	WDI	-	-	-	-	-

Source: Hazardous Waste Data Interrogator and Waste Data Interrogator 2014-2018

## Waste Imports

3.18 The table below is a summary of all waste imports over the last four years. The majority of Wandsworth's imported waste originates in London, although the borough origin of most is not recorded. There are no significant imports of hazardous waste to Wandsworth.

Table 3.8: Waste imports to Wandsworth 2014-2018 (all waste streams)

WPA	Waste	2014	2015	2016	2017	2018
South London (Croydon, Kingston, Merton, Sutton)	CDE	16,803	18,121	25,888	40,105	38,508
WPA not codeable (South London)	HIC	535,139	508,215	523,855	524,392	507,741
WPA not codeable (South London)	CDE	1,509	1,296	2,119	2,576	2,315
Wandsworth	HIC	4,695	17,740	17,178	18,583	19,594
Wandsworth	CDE	6,155	5,766	72,367	56,670	9,819
WPA not codeable (South East)	HIC	54,462	54,186	65,181	65,848	51,125
WPA not codeable (South East)	CDE	2,704	3,144	3,954	1,448	824
WPA not codeable (London)	CDE	21,032	22,709	22,026	21,477	28,905
Kensington & Chelsea	HIC	3,437	12,600	12,017	11,800	12,271
Hammersmith & Fulham	HIC	2,944	10,513	10,307	10,415	10,107
Surrey	CDE	9,027	4,603	8,093	9,995	6,479
City of Westminster	HIC	1,499	5,810	3,587	0	0
<b>Total Imports</b>	<b>All</b>	<b>691,112</b>	<b>675,419</b>	<b>770,920</b>	<b>767,764</b>	<b>693,014</b>

Source: Waste Data Interrogator 2014-2018

3.19 It is not possible to make a direct comparison between waste exports and waste imports because of the inconsistencies in recorded waste movements.

### Duty to Co-operate

3.20 The Duty to Co-operate requires Wandsworth “to engage, constructively, actively and on an on-going basis” with prescribed public bodies in the preparation of development plan documents “so far as relating to a strategic matter”. The National Planning Policy Framework (NPPF) includes infrastructure for waste management as one of the strategic policy areas.

3.21 The National Planning Practice Guidance (NPPG) notes that “Waste is a strategic issue which can be addressed effectively through close co-operation between waste planning authorities and other local planning authorities and public bodies to ensure a suitable and sustainable network of waste management facilities is in place.” (Para 15)

3.22 It goes on to say that “there is no definitive list of actions that constitute effective cooperation under the duty. However, it may include:

- gathering, evaluating and ensuring consistency of data and information required to prepare Local Plans. This may include joint commissioning of studies or the joint preparation of an evidence base
- engaging actively in dialogue, particularly on those types of wastes or waste facilities that will impact most on neighbouring authorities
- active engagement, where necessary, with planning authorities wider than just those who are their more immediate neighbours, particularly if dealing with waste streams for which there is a need for few facilities
- jointly monitoring waste arisings and capacity.

3.23 The NPPG acknowledges the unique waste needs of London, and advises that “there is likely to be a need for waste planning authorities surrounding London to take some of London’s waste. The Mayor and waste planning authorities in London should engage constructively, actively and on an ongoing basis with other authorities, under the duty to cooperate, to help manage London’s waste.”

3.24 In May 2017 the Western Riverside WPAs, including Wandsworth, wrote to 38 authorities who receive significant waste exports from the area asking a number of questions to agree data and determine if waste exports could continue.

3.25 A separate letter was sent to Bexley who receive Wandsworth’s residual household waste as part of the Western Riverside waste Authority’s contract with Cory. In this respect Bexley are an important stakeholder in planning for Wandsworth’s waste. Bexley have confirmed that there is no planning reason why these waste movements cannot continue.

3.26 A summary of the responses of the waste planning authorities which receive waste from Wandsworth is set out in the table below. Full details of the responses can be found in Appendix C.

Table 3.9: Duty to co-operate responses May 2017

Waste Planning Authority	Type of waste	Response Summary
Bexley	HIC	No planning reasons why similar waste movements cannot continue in the future
Buckinghamshire	CDE	Not identified in WTP
East London (Havering, Newham)	HIC CD&E	No response
Essex	CDE	Not identified in WTP
RB Greenwich	CD&E	No response
Hampshire	CDE	Not identified in WTP
Oxfordshire	CDE	Not identified in WTP
Slough	CDE	No response
South London (Merton)	CD&E	No planning reasons why similar waste movements cannot continue in the future
Surrey	CD&E	Patteson Court (Redhill Landfill) will be fully restored by 2030 and cease to accept waste as early as 2027.
Thurrock	CD&E	Most landfill sites operating and receiving CD&E waste in Thurrock are planned to close by 2020 with only one operational site at present planned to continue during the plan period to 2026.
West Sussex	HIC	No response
West London (Ealing, Hillingdon)	HIC CD&E	Sipson North East Inert Landfill is a quarry that uses inert landfill waste as part of the restoration. The planning permission ends August 2017.

3.27 Since February 2019, a new National Planning Policy Framework was published by the government. It requires local planning authorities to prepare statements of common ground to demonstrate effective joint working on cross-boundary strategic matters. A key issue for cross-boundary movements of waste is the declining landfill void space.

- 3.28 Some of Wandsworth’s CD&E exports are received at East Tilbury Quarry in Thurrock and Rainham Landfill in Havering, both of which are due to close during the plan period (in 2021 and 2024 respectively). The market will need to find alternative destinations for Wandsworth’s CD&E waste currently deposited at these sites. In line with the new London Plan requirement for Circular Economy Statements, the target of 95% beneficial use for excavation waste and 95% reuse/recycling/recovery of C&D waste, developers will need to manage CD&E waste as high up the waste hierarchy as possible, diverting it away from landfill where possible.
- 3.29 Waste exported for disposal in landfill tends to be the focus for duty to co-operate engagement because they have finite capacity, unlike facilities that manage waste further up the waste hierarchy. There is approximately 65 million m<sup>3</sup> of inert landfill voidspace in the wider south east region<sup>16</sup>. In terms of future landfill capacity, it is not possible to know how quickly void space in London, South East and East of England will be used up. This will depend on the type and amount of waste produced in the surrounding area, for example from major infrastructure projects such as the Northern Line extension, High Speed 2 and CrossRail 2. However, it is acknowledged that landfill capacity in the wider south east is declining and few new landfill sites are currently being put forward by waste operators. While new landfill sites could come forward during the plan period, declining landfill capacity in the wider south east is an issue for all waste planning authorities preparing plans. It is also recognised that Wandsworth’s waste will have to compete against waste from large-scale infrastructure projects and other authorities for landfill void space.
- 3.30 Wandsworth will need to demonstrate to an Inspector that cross boundary strategic matters on waste have been “dealt with rather than deferred”. As highlighted by the NPPG, engagement on movements of waste is important for waste planning authorities, particularly those outside London, on “those types of wastes that will impact most”, for example those in large quantities, and “waste streams for which there is a need for few facilities”, for example those going to landfill and hazardous waste facilities.
- 3.31 London’s LACW and C&I apportionment and net self-sufficiency targets mean London is planning to provide enough capacity to manage the equivalent of 100% of this waste by 2026. Exports of LACW and C&I have already reduced and much less will be exported from London in the future. London’s net self-sufficiency target also applies to C&D waste. Although C&D waste is not apportioned, boroughs are expected to plan for it in line with policies in the NPPW and the London Plan so exports of this waste stream are also expected to decrease. Excavation waste has a London Plan target of 95% beneficial use which will help divert this waste stream away from landfill sites. Landfill capacity is a particular area of scrutiny for Inspectors and agreement will be sought through statements of common ground that there is available void space to meet Wandsworth’s identified needs.

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<sup>16</sup> [Remaining Landfill capacity dataset](#), Environment Agency (November 2017)

3.32 As part of the Local Plan consultation in 2020, it is recommended that Wandsworth write again to the main recipients of the borough's waste exports to invite comments on the Plan and to work towards agreeing statements of common ground on cross-boundary movements of waste. Appendix B contains up-to-date tables for each waste planning authority which received significant waste exports from Wandsworth over the last five years. These tables can be used for the duty to co-operate engagement.

3.33 Wandsworth will also need to monitor waste exports in the future to identify any deviation from agreements made in statements of common ground. For example, if there are significant changes to the amounts or destinations of Wandsworth's waste exports, the borough will need to engage on this matter with the recipient waste planning authority through the duty to co-operate to ensure that waste exports can continue as planned. This approach will need to be agreed through statements of common ground with recipient WPAs.

**WANDSWORTH WASTE POLICY RECOMMENDATION:**

Include a commitment to ongoing co-operation with other waste planning authorities on imports and exports and to monitor any significant changes to waste movements. Agree this approach through statements of common ground with authorities who receive significant amounts of Wandsworth's waste.

## 4. Identifying waste need

4.1 Wandsworth is required to plan for the management needs of waste generated in the borough, contributing towards the target of net self-sufficiency in London by 2026. There are seven waste streams, including household waste, business waste and construction waste<sup>17</sup>. The London Plan apportions an amount of household and business waste that Wandsworth needs to manage and the Waste Technical Paper (WTP) (2017) estimates how much waste will be generated from the other waste streams.

4.2 In addition, the London Plan requires boroughs to contribute towards minimising waste and achieving recycling and landfill diversion targets. Wandsworth's Local Plan will contribute by safeguarding existing capacity and identifying land for new waste facilities, as well as ensuring there is sufficient space in new development for segregated storage and collection of waste.

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<sup>17</sup> Household waste is also known as "Local Authority Collected Waste" (LACW), business waste is also known as "Commercial and Industrial waste" (C&I) and construction waste is also known as "Construction, Demolition and Excavation waste" (CD&E).

## LACW and C&I waste need

4.3 The London Plan sets out anticipated household and business waste arisings in each London borough (Table 9.1). The London Plan apportions an amount of this waste arising across London to each borough based on a methodology set out in an [evidence base report](#) by SLR/LUC. The draft apportionment targets for Wandsworth are higher than the waste expected to be generated by the borough. The figures for 2026-2036 are not provided in the draft new London Plan or evidence base documents and have been estimated based on proportions of waste arisings.

4.4 The NPPW states that “In London, waste planning authorities should have regard to their apportionments set out in the London Plan when preparing their plans”. Therefore Wandsworth needs to plan to meet the London Plan waste apportionment targets rather than waste arisings.

## CD&E waste need

4.5 The methodology for calculating C&D waste arisings is set out in paragraph 33 of the Planning Practice Guidance. It states “Waste planning authorities should start from the basis that net arisings of construction and demolition waste will remain constant over time” and goes on to say that any significant planned regeneration or major infrastructure projects over the timescale of the Plan may be relevant.

4.6 Wandsworth includes the Vauxhall/ Nine Elms/ Battersea Opportunity Area which is creating a substantial amount of new development, including the Northern Line extension, and with it a substantial amount of CD&E waste. However, this development has been underway for many years and therefore will be reflected in the WDI data available for CD&E waste.

4.7 CD&E waste generation in Wandsworth is highly influenced by commercial, residential and infrastructure development. This means that peaks and troughs are often seen, and it does not necessarily follow a steady linear pattern. Using the Waste Data Interrogator Chapter 17 as a proxy for CD&E, waste arisings over the past five years are as follows.

Table 4.1: CD&E waste arisings 2014-2018

	2014	2015	2016	2017	2018
C&D waste	47,267	61,586	92,234	92,043	85,112
Excavation waste	242,941	271,048	400,823	220,754	139,587

4.8 The average waste arising across the five year period is 75,000 for C&D and 255,000 for E waste, however, it appears that CD&E waste generation is falling after a peak in 2016. To ensure sufficient capacity for C&D waste within Wandsworth, this evidence base projects forward the 85,000 tonnes of C&D waste arising in 2018. While this is higher than the average, it takes into account the potential for peaks and troughs.

4.9 Excavation waste arisings have fallen by 65% since 2016. While excavation waste does not form part of the net self-sufficiency target for London or Wandsworth, it is important to understand how much of this waste stream is being generated and where it is being managed. The variation from year to year in excavation waste arisings means it is difficult to project waste arisings in the future. Exports of this waste stream generally follow the same trend as arisings. For monitoring purposes the average figure of 250,000 tonnes will be used.

## Hazardous waste

4.10 All the waste streams include some hazardous waste. There is a small clinical waste transfer facility in Wandsworth for hospital waste. However, most hazardous waste arising in Wandsworth is exported to be treated at specialist facilities which have a wide catchment area. Recent hazardous waste arisings are small and a dedicated facility for Wandsworth's hazardous waste is unlikely to be viable. Due to their specialist nature, planning for hazardous waste facilities is a strategic (regional) issue and Wandsworth will co-operate with the Greater London Authority on this.

## Other waste streams

4.11 A small amount of low level radioactive waste (2.9 million MBq) arises in Wandsworth and is disposed of through waste water and air. There is no identified need for new capacity for this waste stream.

4.12 There is no agricultural waste arising in Wandsworth and therefore no identified need for new capacity for this waste stream.

4.13 Wandsworth's wastewater and sewage sludge is treated at the sewage treatment works in Beckton, LB Newham. Thames Water is undertaking an upgrade and expansion of this facility which also treats the waste of a number of London boroughs. This will build sufficient sludge processing plant to account for population growth in the catchment area up to 2035, and therefore no additional facilities are required.

## Summary of waste need

4.14 A summary of the amount of waste Wandsworth needs to plan for is set out in Table 4.2.

Table 4.2: Identified waste management need (tonnes)

	2021	2026	2031	2036
LACW/C&I waste apportioned to Wandsworth in the London Plan <sup>18</sup>	264,000	266,000	268,000	274,000
C&D waste	85,000	85,000	85,000	85,000
Excavation waste	250,000	250,000	250,000	250,000
All other waste streams	0	0	0	0

Source:

## Existing sites and capacity

4.15 Waste capacity in Wandsworth comes from a number of sources, in particular existing capacity from operational licenced and exempt waste facilities. There are also non-operational or vacant safeguarded waste sites in Wandsworth that can be brought back into waste use and contribute towards future need. Pipeline capacity is another source; sites with planning permission for a new waste facility or intensification of an existing facility. Lastly, new waste sites can be submitted by operators or developers during the Local Plan preparation and can be identified and safeguarded for future waste use. These waste capacity sources are set out below.

### Existing licenced waste sites

4.16 Draft London Plan 2017 policy SI9 requires all existing waste sites to be safeguarded and retained in waste use. Existing waste sites are defined in the London Plan (July 2019) as land with planning permission for a waste use or a permit from the Environment Agency for a waste use. There are 14 existing waste sites in Wandsworth and these should be identified and safeguarded in Wandsworth’s Policies Map.

4.17 Existing waste facilities in Wandsworth are listed in Table 4.3. The table also includes the type of waste managed at each facility and the capacity which is the maximum throughput each site has achieved over the last five years. If a site manages more than one waste stream, the proportions of each type of waste will vary from year to year, so for the purposes of this data study, the proportions for each waste stream are an average over five years. More details on these sites are provided in the Site Profiles in Appendix A.

4.18 Recycling and treatment facilities contribute towards “managing” waste. Although transfer (storage) capacity does not contribute towards ‘managing waste’, many facilities categorised as Waste Transfer Station (WTS) undertake some recycling. Suez WTS is known to recycle around 45% of its throughput and this has been included in the

<sup>18</sup> Apportionment targets in the London Plan are provided for 2021 and 2041 only. The figures for years 2026, 2031 and 2036 have been estimated using Wandsworth’s apportionment share of 3.2% of the overall waste arisings in London.

‘existing capacity’ total. WRWA have confirmed that their WTS do not undertake any recycling. None of the smaller WTS undertake any recycling. The new Cory facility at Pensbury Place is likely to undertake some recycling, but it is not yet operational. This facility is discussed under ‘pipeline capacity’ below.

4.19 The London Plan (July 2019) makes it clear that waste management capacity of existing sites should be optimised. The Site Profiles assess if there is opportunity to upgrade or intensify existing facilities. The potential to intensify existing facilities was assessed by three methods:

- Engagement with the operator to ascertain if there are any plans to upgrade the facility or increase throughput;
- Opportunity to extend operational hours in accordance with planning permission; and
- Assessment of each facility against the average throughputs for the type of facility and waste stream.

4.20 No operator contacted had plans to upgrade the facility or increase throughput at this time. All the operating facilities which ‘manage’ waste have an average or above-average throughput. There may be an opportunity for the Suez WTS to increase its throughput by extending its operational hours to 24/7, which is allowed by the extant planning permission. However, Suez do not currently have any plans to do so.

**WANDSWORTH POLICY RECOMMENDATION:**

Require operators to optimise the capacity at new facilities, including replacement or expanding of existing sites.

Table 4.3: Operational waste sites in Wandsworth with maximum throughput capacity

Site Name	Address	Size (ha)	Facility Type	Input Waste type(s)	2014	2015	2016	2017	2018	Maximum capacity (tonnes)
Cringle Dock WTS (Cory)	Cringle Dock SWTS, Cringle Street, Battersea, London, SW11 8BX	1.13	Transfer	HIC	263,675	288,555	307,049	308,077	289,565	308,077
EMR	Private Sidings, Pensbury Place, Wandsworth, London, SW8 4TP	0.79	Recycling	Total	57,170	57,331	69,244	67,576	52,255	69,244
				HIC (av96%)	54,462	54,186	65,181	65,848	51,125	(66,474)
				CDE (av4%)	2,704	3,144	3,954	1,448	824	(2,770)
Pensbury Place Transfer Station (Cory)	Pensbury Place Transfer Station 661-679 Pensbury Place Battersea SW8 4TP	0.79	Transfer	HIC CDE	-	-	-	-	-	175,000 (new permission)
Smugglers Way waste facilities (WRWA/Cory)	Smugglers Way, Wandsworth, London SW18 1EG	3.4	Recycling	HIC	72,683	71,570	66,237	64,672	69,809	72,683
			Transfer		219,683	221,523	219,846	220,095	221,633	221,633
Wandsworth Transfer Station (Suez)	British Rail Goods Yard, Pensbury Place, Wandsworth, London SW8 4TR	0.17	Transfer with 45% recycling	Total	20,529	21,391	20,731	21,559	29,738	29,738 (45% = 13,382)
				HIC (av15%)	13,936	1,233	465	82	833	(4,460) (45% = 2,007)

Site Name	Address	Size (ha)	Facility Type	Input Waste type(s)	2014	2015	2016	2017	2018	Maximum capacity (tonnes)
				CDE (av85%)	6,593	20,158	20,266	21,477	28,905	(25,277) (45% = 11,374)
The Willows MRF	Cappagh Public Works Ltd, The Willows Materials Recycling Facility, Riverside Road, London SW17 0BA	0.57	Recycling	CDE	67,778	52,721	58,790	73,114	68,820	73,114

Source: Waste Data Interrogator 2014-2018

4.21 Table 4.4 sets out how much waste management capacity Wandsworth’s operational licenced waste sites contribute.

Table 4.4: Waste management capacity at Wandsworth’s operational licenced waste sites (tonnes)

LACW/C&I recycling capacity	C&D recycling capacity
141,164	87,258

#### Non-operational waste sites

4.22 New waste facilities could come forward on non-operational waste sites. Table 4.5 summarises the potential for these sites to deliver additional waste management capacity if brought back into waste use, based on an average throughput of 60,000 tonnes throughput per hectare. This totals 2,400 tonnes which equates to 1,200 tonnes for each waste stream if divided equally between LACW/C&I (apportioned) and C&D. More details on these sites are provided in the Site Profiles in Appendix A.

Table 4.5: Non-operational waste sites in Wandsworth with maximum throughput capacity

Site	Size	Status	Potential capacity <sup>19</sup>
Biffa Waste Services, 45 Pensbury Place, London SW8 4TR	0.18ha	Safeguarded waste site (Pensbury Place Waste Management Site)	None in the short term. Used as a depot for waste collection vehicle parking and bin storage. There are no plans to change the use of this site.
D Goldsmith	0.04ha	Safeguarded waste site	2,400 tonnes

#### Exempt sites

4.23 Capacity assumptions for exempt sites (waste sites not requiring Environment Agency permits to operate) to manage apportioned waste remain the same as in the Western Riverside Waste Technical Paper (Table 30) and have been brought forward into this paper. Capacity from exempt sites is 6,380 tonnes throughput and can contribute towards capacity for the LACW/C&I (apportioned) waste streams.

#### Pipeline capacity

4.24 The Cory waste transfer station (WTS) at Pensbury Place has planning permission for 175,000 tonnes of capacity, but the facility has not yet been built. The waste streams managed at this facility will be LACW, C&I and C&D. The facility is categorised as a transfer station but the operator has confirmed that some recycling will be undertaken at this facility, however the proportion is not yet known and it will depend on the type of feedstock. WTS are known to recycle anywhere between 0% and 96% of throughput but

<sup>19</sup> Based on a throughput of 60,000 tonnes per hectare.

it is not possible to provide an exact figure for the Pensbury Place facility which is not yet operational.

4.25 To provide an idea of the potential recycling capacity at Cory’s new facility at Pensbury Place which could contribute towards managing waste Table 4.6 considers a range of recycling proportion scenarios. The scenarios also assume that recycling capacity is divided equally between the LACW/C&I waste stream and C&D waste stream. It is also assumed that throughput will be in line with the planning permission of 175,000 tonnes per annum. Under these circumstances,

Table 4.6: Potential recycling capacity at Cory’s new facility at Pensbury Place

Proportion of waste recycled	LACW/C&I recycling capacity	C&D recycling capacity
20%	17,500	17,500
35%	30,600	30,600
50%	43,750	43,750
75%	65,625	65,625
90%	78,750	78,750

#### New waste sites

4.26 No new waste sites have been put forward by operators during the call for sites.

#### Summary of existing capacity and potential capacity

4.27 A summary of capacity from existing licenced and exempt facilities, and potential capacity from non-operational waste sites and pipeline facilities is set out in Table 4.7.

Table 4.7: Existing and potential waste management capacity in Wandsworth (000 tonnes)

Capacity source	LACW/C&I recycling capacity	C&D recycling capacity
Existing licenced waste sites	141,164	87,258
Exempt waste sites	6,380	0
<b>Total existing capacity</b>	<b>147,544</b>	<b>87,258</b>
Intensification of existing facilities	0	0
Non-operational waste sites	1,200	1,200
Pipeline capacity	17,500 - 78,750	17,500 - 78,750
New sites	0	0
<b>Total potential capacity</b>	<b>18,700-79,950</b>	<b>18,700-79,950</b>

## Capacity Gap

4.28 The difference between waste capacity (table 4.7) and waste need (Table 4.2) is the capacity gap. The capacity gap for Wandsworth is show in Table 4.8 below. Capacity gaps are shown separately for LACW/C&I (apportioned) waste streams and CD&E waste streams.

Table 4.8: Waste need, capacity and capacity gap for LACW and C&I 2021-2036

LACW and C&I	2021	2026	2031	2036
Apportioned target	264,000	266,000	268,000	274,000
Existing waste management capacity <sup>20</sup>	147,544	147,544	147,544	147,544
<b>Capacity gap</b>	<b>116,456</b>	<b>118,456</b>	<b>120,456</b>	<b>126,456</b>

4.29 Table 4.8 shows there is a capacity gap for LACW and C&I (apportioned) waste rising from around 116,450 tonnes in 2021 to 126,450 tonnes in 2036. The capacity gap could be reduced by bringing the vacant waste site back into waste use and through recycling in Cory's new waste transfer facility at Pensbury Place. The amount of waste which will be recycled at the Pensbury Place facility is not yet known, but Table 4.6 shows a range of scenarios to show how much capacity this facility could contribute.

Table 4.9: Waste need, capacity and capacity gap for CD&E waste 2021-2036

C&D + as much E as possible	2021	2026	2031	2036
Projected C&D waste arisings	85,000	85,000	85,000	85,000
Existing waste management capacity <sup>21</sup>	87,258	87,258	87,258	87,258
Capacity Gap for C&D	0	0	0	0
Projected E waste arisings	250,000	250,000	250,000	250,000
Capacity towards off-setting E waste	2,258	2,258	2,258	2,258

4.30 Table 4.9 shows there is no capacity gap for C&D waste management in Wandsworth and that there is around 2,258 tonnes of additional capacity which can contribute towards off-setting excavation waste exports. Additional CD&E management capacity gap could also come forward through bringing the vacant waste site back into waste use and through recycling in Cory's new waste transfer facility at Pensbury Place.

4.31 Excavation waste (soils and stones) is very difficult to 'recover' or 'recycle' and built facilities are not generally used to manage this waste stream. The exception to this would include facilities for soil decontamination. In order to limit the amount of excavation waste going to landfill, the London Plan has a target of 95% excavation waste to be used for 'beneficial use'. Beneficial use includes restoration of landfill sites or priority habitat and flood alleviation. Excavation waste is not included in the net self-sufficiency target for managing within Wandsworth, however the borough is committed

<sup>20</sup> Existing licenced and exempt waste management capacity

<sup>21</sup> Existing licenced and exempt waste management capacity

to managing as much of this waste as practicable and therefore the remaining CD&E capacity is allocated towards this endeavour.

### Land required to meet capacity gaps

4.32 Boroughs must allocate sufficient land and identify waste management facilities to provide the capacity to manage their apportioned tonnages of waste. Different types of waste facilities need different size sites; as a general rule, the higher up the waste hierarchy the more land is needed.

4.33 Given the challenging recycling targets set out in the London Plan, new recycling capacity should be welcomed. However, it is very difficult for a Local Plan to influence the type of capacity coming forward.

#### WANDSWORTH POLICY RECOMMENDATION

Encourage additional recycling capacity in the borough.

4.34 The WTP used 80,000 tonnes per hectare, a figure that has also been used by the GLA as well as others. However, 80ktph is an average of all types of waste facilities including transfer stations which do not ‘manage’ waste and have a much higher throughput than other types of facility. The Environment Agency have suggested that 60kt per hectare is more realistic. However, WRWA’s materials recycling facility at Smuggler’s Way manages the equivalent of around 128,000 tonnes per hectare and demonstrates a higher throughput per hectare can be achieved for the LACW/C&I waste streams.

4.35 Table 4.10 sets out how much land will be required using both 60ktph and 128ktph to calculate how much land is needed to meet the capacity in Wandsworth. This is indicative only as technologies will change and improve over the plan period and the identified waste management need against capacity will be the monitoring measure.

Table 4.10: Indicative land required to meet Wandsworth’s capacity gap 2021-2036

	2021	2026	2031	2036
LACW and C&I (60ktph)	1.9ha	2.0 ha	2.0 ha	2.1 ha
LACW and C&I (128ktph)	0.9ha	0.9ha	0.9ha	0.9ha
C&D	0	0	0	0

4.36 As stated above the capacity gap will reduce once Cory’s new waste transfer facility at Pensbury Place is operational, but the amount of waste which will be recycled is as yet unknown. Monitoring will be required and any additional recycling capacity used to off-set the capacity gap.

#### WANDSWORTH WASTE POLICY RECOMMENDATION:

Be clear that Wandsworth has a capacity gap for its waste management needs for LACW, C&I and C&D waste streams, including hazardous waste, over the plan period.

Be clear that, in order to meet the capacity gap, waste sites in Wandsworth are safeguarded and will only be released for other uses if replacement capacity is provided.

Include monitoring indicators for new waste management capacity in Wandsworth against the waste need.

## 5. Land search

5.1 At the core of waste planning is the requirement for waste planning authorities to “prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams.” Wandsworth’s identified waste needs are set out in section 4 above. This need equates to approximately 2.1ha of land, depending on the type of technology used.

5.2 The London Plan identifies the following types of locations as a focus for new waste capacity and facilities:

- a) Existing waste and secondary material sites/land, particularly waste transfer facilities, with a view to maximising their capacity
- b) Strategic Industrial Locations and Locally Significant Industrial Sites
- c) Safeguarded wharves with an existing or future potential for waste and secondary material management.

Each type of location is examined in further detail below.

5.3 Profiles for each existing waste facility can be found in Appendix A. The profiles include information about the facility type, size and waste managed. The throughput is assessed to see if the facility is performing within the expected range and if there are any opportunities for intensification. None of the existing operational waste sites in Wandsworth currently have the potential for additional capacity. As well as pipeline capacity at the Pensbury Place Transfer Station (see Table 4.6), there is an opportunity to bring a vacant site (D Goldsmith) back into waste use.

5.4 The Local Plan Employment and Industrial document identifies two safeguarded wharves; Cringle Dock and Kirtling Wharf. Cringle Dock is an existing waste facility but there are no known plans to expand existing capacity on the site. Kirtling Wharf is identified in the Site Specific Allocations Document as a Safeguarded Wharf with

potential for residential led mixed use development above. The allocation stipulates that the site must remain a safeguarded wharf and the design principles state: ‘Any proposals for mixed use development will need to ensure that they did not have a negative impact on the operation of the safeguarded wharf including appropriate access arrangements and that the operational capacity of the wharf is retained’. The site is currently subject to a Thames Tideway Tunnel Safeguarding Direction which will remain in force until 30 April 2022. Kirtling Wharf has the potential in the longer term to be utilised for waste uses, although this is likely to be in the transfer of waste rather than recycling or recovery.

5.5 Waste Planning authorities are required to “identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations.” Strategic Industrial Land (SIL) and Locally Significant Industrial Areas (LSIAs) represent Wandsworth’s main stock of safeguarded industrial land and, as such are the most appropriate locations for waste facilities which are classified as industrial use.

5.6 The benefits of directing new waste facilities towards SIL and LSIAs includes co-location with other industrial uses. This helps to reduce the risk of waste facilities being located next to more sensitive development, such as residential. SIL and LSIAs have already been assessed for their suitability for industrial uses and are safeguarded for these uses. SIL and LSIAs also tend to have access which is wide enough for larger vehicles and are well-connected to main road networks.

5.7 Policy EI3 identifies Wandsworth’s strategic reservoir of industrial land, and safeguards this land for industrial uses. The safeguarded industrial areas comprise:

Name	Designation	Size (ha)
Queenstown Road, Battersea	Strategic Industrial Location	42.9
Old Sergeant	Locally Significant Industrial Area	3.5
Kimber Road	Locally Significant Industrial Area	7.2
Lydden Road	Locally Significant Industrial Area	2.7
Thornsett Road	Locally Significant Industrial Area	1.1
Summerstown	Locally Significant Industrial Area	10.1
<b>Total</b>		<b>67.5</b>

5.8 National Planning Policy for Waste (NPPW) requires waste planning authorities to “identify the broad type or types of waste management facility that would be appropriately located on the allocated site or in the allocated area in line with the waste hierarchy, taking care to avoid stifling innovation” (part 4).

5.9 Some types of waste facilities are not appropriate in Wandsworth due to their impact on the dense urban environment, including the visual impact from large scale facilities, noise, dust, and odour. Facilities not considered appropriate include landfill, energy

from waste facilities, and open windrow composting. Some facilities will only be appropriate where they are located away from residential development and other sensitive receptors. These include Mechanical biological treatment (MBT) and Anaerobic Digestion due to potential issues with odour, construction/demolition waste and metal recycling which can be noisy and/or dusty. Any new facility in Wandsworth will need to be enclosed to reduce noise, dust odour, litter and vermin.

5.10 The broad types of waste facility suitable for the SIL and LSIA in Wandsworth are set out in Table 5.1, along with their level in the waste hierarchy, an estimated average throughput per hectare, and a summary of the potential issues and mitigation measures to consider.

Table 5.1: Broad types of waste facilities suitable in Wandsworth

	Type of Facility			
	Repair and Reuse	Recycling and Reprocessors	Treatment	Collection and handling
Level in the waste hierarchy	“Preparing for Re-use”	“Recycling”	“Other recovery”	Sorting for onward journey to other facility
Example facility	Small-scale repair and refurbishment workshop	Materials recovery facility, turning waste material into new products)	Mechanical biological treatment (MBT), Anaerobic Digestion	Transfer station
Potential issues	Safe access for residents	Vehicle movements	Odour, vehicle movements	Noise, dust, litter, vehicle movements
Mitigation measures	<ul style="list-style-type: none"> <li>• Enclosed facility</li> <li>• Appropriate and well-maintained and managed equipment and vehicles</li> <li>• Smaller scale</li> <li>• Restrictions to operating hours</li> </ul>	<ul style="list-style-type: none"> <li>• Enclosed facility</li> <li>• Suitable road access</li> <li>• Appropriate and well-maintained and managed equipment and vehicles.</li> <li>• No putrescible waste</li> <li>• Smaller scale</li> <li>• Restrictions to operating hours</li> </ul>	<ul style="list-style-type: none"> <li>• Enclosed facility</li> <li>• Locate away from sensitive receptors</li> <li>• Suitable road access</li> <li>• Appropriate and well-maintained and managed equipment and vehicles</li> <li>• Smaller scale</li> </ul>	<ul style="list-style-type: none"> <li>• Enclosed facility</li> <li>• Locate away from sensitive receptors</li> <li>• Suitable road access</li> <li>• Appropriate and well-maintained and managed equipment and vehicles.</li> <li>• No putrescible waste</li> </ul>

	Type of Facility			
	Repair and Reuse	Recycling and Reprocessors	Treatment	Collection and handling
			<ul style="list-style-type: none"> <li>Restrictions to operating hours</li> </ul>	<ul style="list-style-type: none"> <li>Smaller scale</li> <li>Restrictions to operating hours</li> </ul>

5.11 The SIL and SLIAs have been assessed for their suitability for each broad type of waste facility and the full assessments can be found in Appendix D. A summary of the results is set out in Table 5.2.

Table 5.2: Results of the SIL and SLIAs assessments for each type of facility

Area	Size (ha)	Repair and Reuse	Recycling and Reprocessors	Treatment	Collection and handling
Queenstown Road, Battersea	42.9	✓	✓	✓	✓
Kimber Road	7.2	X	✓	✓	✓
Lydden Road	2.7	✓	✓	X	✓
Old Sergeant	3.5	X	✓	✓	✓
Summerstown	10.1	X	✓	✓	✓
Thornsett Road	1.1	✓	✓	X	✓
Total	67.5				

**WANDSWORTH WASTE POLICY RECOMMENDATION:**

Identify existing facilities, safeguarded wharves and SIL /LSIA as locations suitable for new waste capacity in Wandsworth.

5.12 To meet the capacity gap, Wandsworth's Local Plan will identify and continue to safeguard existing waste sites and identify sufficient opportunities to meet the identified needs of the Borough to meet its capacity gap. If new sites come forward for waste use as part of the Plan preparation they will need to be identified and safeguarded in the Local Plan. However, no new sites for waste came forward through the call for sites process carried out by Wandsworth in December 2018. It is therefore anticipated that the capacity gap will be met through land within the SIL and LSIA's.

- 5.13 Some types of waste facilities are not appropriate in Wandsworth due to their impact on the dense urban environment, including the visual impact from large scale facilities, noise, dust, and odour. Some facilities will only be appropriate where they are located away from residential development and other sensitive receptors. Any new facility in Wandsworth will need to be enclosed to reduce noise, dust odour, litter and vermin. The broad types of waste facility suitable for Wandsworth are set out in Table 5.1.
- 5.14 Table 5.2 above identifies a total of 67.5 hectares is designated as Strategic Industrial Land (SIL) or Locally Significant Industrial Areas (LSIA) which could be suitable for a range of waste uses.
- 5.15 It is not possible or desirable to safeguard an entire SIL or LSIA for waste use but individual plots could come forward for development over the plan period and this will need to be monitored to ensure that provision of capacity is in line with need. Wandsworth cannot itself deliver new waste capacity, but can create opportunity through its Local Plan policies for the market to bring forward new waste capacity. Wandsworth's Employment Land and Premises Study (ELPS) takes account of the demand for waste management as part of the calculation of net requirement for land and floorspace. Table 7.2 Supply/Demand Balance for Industrial Land 2019 to 2034 identifies an additional demand for 2.1ha for waste facilities, reflecting the findings of this Waste Evidence Base.
- 5.16 There are a number of examples elsewhere in London which provide evidence of waste operators upgrading and expanding their waste facilities. In South London, Suez has recently gained planning permission for a new Resource Recovery Facility which will manage up to 350,000 tonnes per annum. This new facility not only provides compensatory capacity for another Suez facility which can be released for other uses, but provides an additional 200,000 net increase of capacity to manage waste in South London. In Lambeth, a planning application has been submitted for a new metal recycling facility which could manage around 38,000 tonnes of waste a year. In North London, Powerday gained permission to upgrade from a transfer station with a throughput of around 50,000tpa to a Materials Recovery Facility managing up to 330,000tpa. In Southwark, a new Integrated Waste Management Facility off Old Kent Road opened in 2012 and includes a Materials Recovery Facility, a Mechanical Biological Treatment facility, as well as a public Reuse and Recycling Centre. The combined permitted throughput is around 200,000tpa.

## 6. Wandsworth's Waste Planning Strategy

6.1 This section takes the findings of the waste evidence base work and proposes a waste planning strategy for Wandsworth.

### Amount and location of new land

6.2 It is estimated that up to 2.1ha of land will be needed in Wandsworth over the Local Plan period to 2036 to deliver the capacity gap for all waste streams identified (see section 4).

6.3 New waste facilities should be directed to SIL and LSIA's. Not all types of waste facilities are suitable for the urban environment of Wandsworth. The broad types of waste facilities which are suitable in principle in each SIL and LSIA have been identified in table 5.2; although in each case development proposals would be subject to planning permission taking account of all relevant planning considerations. The Local Plan will need to signpost this information.

#### WANDSWORTH WASTE POLICY RECOMMENDATION:

Be clear that Wandsworth's policy approach to meeting its waste need is to optimise waste management throughput on existing waste sites where possible and direct any new waste facilities towards industrial land.

### Policy Recommendations

6.4 A number of policy recommendations have been identified from consultation responses, policy context and waste need. Wandsworth's Local Plan Review should include a waste policy and supporting text which takes account of these. The recommendations are set out below.

- A. Review existing policy EI 8 in light of more recent policies in the NPPW, London Plan and findings in this Evidence Base, including planning for seven waste streams, identifying locations suitable for new waste facilities and assessment criteria for new waste facilities.
- B. Ensure that Wandsworth's plan for waste, and the justification for the approach, is explained clearly in the supporting text.
- C. Be clear that Wandsworth's policy approach to meeting its waste need is to optimise waste management throughput on existing waste sites where possible and direct any new waste facilities towards industrial land.

- D. Identify existing waste sites, and the amount and type of waste managed. Ensure this capacity is protected through safeguarding in the Policies Map and that the ability of the site to operate is protected through the agent of change principle.
- E. Update the policies map to identify safeguarded wharves and designated industrial land (SIL and LSIAs) as locations suitable for new waste capacity.
- F. Require operators to optimise the capacity at new facilities, including replacement or expanding of existing sites. Encourage additional recycling capacity in the borough.
- G. Reflect the London Plan waste policies and targets into the approach to waste for Wandsworth, including circular economy principles. Be clear that waste apportionment targets for LACW and C&I waste streams increase over the plan period, and that Wandsworth has a capacity gap for its waste management needs for LACW, C&I and C&D waste streams, including hazardous waste, over the plan period.
- H. Be clear that, in order to meet the capacity gap, waste sites in Wandsworth are safeguarded and will only be released for other uses if replacement capacity is provided. Consider extending the policy for compensatory capacity to require waste capacity re-provision within Wandsworth. Include the requirement for compensatory capacity to be at or above the same level of the waste hierarchy of that which is lost.
- I. Include cross-reference to design policies for sufficient space for the separation and storage of recyclables, food waste and residual waste for collection to help increase recycling in the Borough.
- J. Include a commitment to ongoing co-operation with other waste planning authorities on imports and exports and to monitor any significant changes to waste movements. Agree this approach through statements of common ground with authorities who receive significant amounts of Wandsworth's waste.
- K. Include benchmark data so that Wandsworth's waste management capacity can be monitored. Include monitoring indicators for new waste management capacity in Wandsworth against the waste need.

## Monitoring

6.5 In order to monitor the new waste policy the following indicators are recommended.

Table 6.1: Recommended monitoring indicators

Suggested indicator	Source of data	Target
Existing waste management capacity for LACW/C&I and C&D waste streams	WDI	To meet waste management capacity needs set out in Table W.1 against baseline figures in W.3 and W.4.
Waste exports	WDI	A reduction in exports from a baseline set out in Table W.4.
Recycling targets for LACW/C&I and C&D	WDI, Defra	To meet London Plan targets of: 65% municipal waste by 2030 95% C&D

### Ongoing duty to co-operate on cross-boundary waste matters

6.6 As part of the Local Plan review Wandsworth will need to write again to the main recipients of Wandsworth’s waste exports to tell them how the authority is planning for waste and to ask if there any planning reasons why the current pattern of waste flows cannot continue. As part of the Regulation 18 consultation, Wandsworth will write to west London, east London, Southwark and Wandsworth about LACW and C&I waste exports and to the west London boroughs, the east London boroughs, the south London boroughs, Greenwich, Wandsworth, Surrey and Thurrock about inert waste exports. Wandsworth will seek to agree statements of common ground on the approach to waste exports with recipients of significant exports from the borough (see section 3 above).

6.7 In addition, Wandsworth will need to engage with the other Western Riverside waste planning authorities. The London Borough of Hammersmith & Fulham (LBH&F) and the Old Oak and Park Royal Development Corporation (OPDC) have said they are unable to commit to pooling with the Western Riverside WPAs until further work has been completed. It will be important to stay up to date on this further work and keep informed of any changes to LBH&F’s and OPDC’s view on joint working.

6.8 Wandsworth will also need to prepare a statement of common ground with Bexley and Wandsworth to show that there are no planning reasons why the export of household waste to facilities in these areas cannot continue.

## Appendix A: Site Profiles

[Biffa Waste Services](#)

[Cringle Dock WTS \(Cory\)](#)

[D Goldsmith](#)

[European Metal Recycling \(EMR\)](#)

[Pensbury Place Transfer Station \(Cory\)](#)

[Smugglers Way waste facilities \(WRWA/Cory\)](#)

[Wandsworth Transfer Station \(Suez\)](#)

[The Willows MRF](#)

<b>Site Name:</b>	<b>Biffa Waste Services (Central London Depot)</b>	
<b>Site address</b>	45 Pensbury Place, London SW8 4TR	
<b>OS grid reference</b>	529378 (Easting), 176475 (Northing)	
<b>Site size (ha)</b>	0.18	
<b>Location map</b>		
<b>Site operator</b>	Biffa Waste Services	
<b>Site owner</b>	Biffa Waste Services	
<b>Type of facility</b>	Vehicle depot	
<b>Max throughput</b>	N/A	
<b>Licensed capacity</b>	N/A	
<b>Permit number</b>	N/A	
<b>Type of waste accepted</b>	N/A	
<b>Management type</b>	N/A	
<b>Location and surrounding land uses (existing and proposed)</b>	This site is located in part of the wider 'Pensbury Place Waste Management Site' which covers a cluster of waste sites. The site lies in the Queenstown Strategic Industrial Location (SIL) and surrounding uses are of a similar industrial nature.	
<b>Nature and scale of the facility</b>	The site is in use as a depot for waste collection vehicle parking and bin storage. The site is mostly open standing for vehicles with two single storey portacabin offices near the entrance at the south of the site.	
<b>Access, congestion and road capacity</b>	Access from Pensbury Place.	
<b>Opportunity to use rail or water to transport waste</b>	There are two railheads nearby, including one used by Day Aggregates. There is an opportunity to discuss use of these railheads for transporting waste.	
<b>Planning policy designation</b>	<b>SIL/LSIA</b>	Queenstown SIL
	<b>Safeguarded</b>	Yes, part of the Pensbury Place Waste Management Site
	<b>Opportunity area</b>	Nine Elms Vauxhall OA
	<b>Other designations</b>	None
	<b>Air Quality Focus Area</b>	No
	<b>Environmental designations</b>	The site is partially located within an area of deficiency in access to nature. The site is partially located within an Open Space Deficiency Area.
	<b>Flood Affected</b>	3a

<b>Site Name:</b>	<b>Biffa Waste Services (Central London Depot)</b>	
		Areas benefiting from flood defences
	<b>Heritage assets</b>	The site is partially located within an archaeological priority area and is in close proximity to Heathbrook Park, which is of local historic significance
	<b>B1a – C3 Article 4 Area</b>	Yes
<b>Planning history</b>	<p><a href="#">2019/2925</a> Planning permission for demolition of existing single storey offices space and erection of new two storey offices. REGISTERED 22/07/2019</p> <p><a href="#">2017/1219</a> Extension to existing single-storey portacabin located in the south of the site to create a second storey. Approve with Conditions 17/05/2017</p> <p><a href="#">2012/0935</a> Variation of condition 3 of planning permission dated 30/03/99 (ref: N/97/0825), to allow the site to operate between 0100 Monday mornings through to 1500 on Saturday afternoons. Approve with Conditions 19/04/2012</p> <p><a href="#">2011/2778</a> Variation of condition 3 of planning permission dated 30/03/99 (ref: N/97/0825), to allow the site to operate between 0100 Monday mornings through to 1500 on Saturday afternoons. Approve with Conditions 23/08/2011</p> <p><a href="#">2010/4718</a> Variation of condition 3 of planning permission granted on appeal by the Inspector appointed by the Secretary of State on 30/03/99 (ref: N/97/0825), to allow the site to operate between 0100 Monday mornings through to 1500 on Saturday afternoons. Approve with Conditions 23/12/2010</p>	
<b>Contact with operator</b>	Yes	
<b>Opportunity to intensify or upgrade operation</b>	There are currently no plans to change the use of the site.	

<b>Site Name:</b>	<b>Cringle Dock WTS (Cory)</b>	
<b>Site address</b>	Cringle Dock SWTS, Cringle Street, Battersea, London, SW11 8BX	
<b>OS grid reference</b>	TQ2915577558	
<b>Site size (ha)</b>	1.13 ha.	
<b>Location map</b>		
<b>Site operator</b>	Cory Environmental Ltd	
<b>Site owner</b>	Western Riverside Waste Authority	
<b>Type of facility</b>	A11 : Household, Commercial & Industrial Waste T Stn	
<b>Max throughput</b>	308,077	
<b>Licensed capacity</b>	300,000	
<b>Permit number</b>	GP3790EN (83275)	
<b>Type of waste accepted</b>	HIC	
<b>Management type</b>	Transfer	
<b>Location and surrounding land uses (existing and proposed)</b>	The site is located on the Thames riverside, north of Cringle Street adjacent to Kirtling Wharf safeguarded wharf, and is within the Nine Elms Riverside district of Nine Elms.	
<b>Nature and scale of the facility</b>	The waste transfer station was constructed in the 1970s and includes a dock that extends into the site from the river. The existing buildings on site comprise approx. 8,799 sq.m (GEA). The five main structures include weighbridges near the entrance to the site, a three-storey tipping hall, a loading shed that covers the dock which can accommodate four barges, a metal-framed tipping shed for bulk waste in the north-west corner of the site, and outdoor storage bays in the south-west corner of the site.	
<b>Access, congestion and road capacity</b>	The site is accessed by road from Cringle Street off Nine Elms Lane, or via Kirtling Street off Battersea Park Road, and currently has a PTAL rating of 3. Cringle Dock currently operates 24 hours a day, 364 days of the year. Waste is removed by barge along the Thames River	
<b>Opportunity to use rail or water to transport waste</b>	Yes, waste is transferred on barges along the Thames River to an energy from waste facility at Belvedere in the London Borough of Bexley.	
<b>Planning policy designation</b>	<b>SIL/LSIA</b>	No
	<b>Safeguarded</b>	Yes
	<b>Opportunity area</b>	Nin Elms Opportunity Area
	<b>Other designations</b>	Wandsworth Thames Policy Area

<b>Site Name:</b>	<b>Cringle Dock WTS (Cory)</b>	
		CAZ Safeguarded Wharf Decentralised Energy Opportunity Area
	<b>Air Quality Focus Area</b>	No
	<b>Environmental designations</b>	The site is located within an Open Space Deficiency Area.
	<b>Flood Affected</b>	The site is located within flood zone 3a. A site specific Flood Risk Assessment including a flood warning and evacuation plan is required. Sites with a tidal Thames frontage should address the requirements of the Environment Agency's Thames Estuary 2100 (TE2100) Plan to ensure that these sites are protected for their lifetime and ensure the necessary level of protection is provided to London as a whole.  Area Benefiting from flood defences
	<b>Heritage assets</b>	The site lies within an archaeological priority area, adjacent to Battersea Power Station (Grade II* listed building). To the north across the River Thames are the Churchill Gardens, Pimlico and Dolphin Square Conservation Areas and beyond is the Palace of Westminster World Heritage site, all of which lie within the City of Westminster.
	<b>B1a – C3 Article 4 Area</b>	Yes
<b>Planning history</b>	<a href="#">2015/6359</a> Battersea Power Station Kirtling Street and Cringle Dock Waste Transfer Station Cringle Street SW8 Application for Amendments to the outline planning permission dated 5th December 2014 (ref; 2014/2837) for the restoration, extension, alterations and conversion of the Power Station building to provide retail, residential flats, business, cultural, hotel and conference facilities, event space and incidental accommodation; the demolition of other buildings and development of the land surrounding the Power Station and adjacent/nearby sites to provide retail, restaurants bars and cafes, offices, hotel, residential, community and cultural space, assembly and leisure space, student housing, serviced apartments, an energy centre and basement plant; parking for cars, coaches, motorcycles and bicycles; new access and internal road system and servicing; 'off-site' highway works; works to the jetty and riverwall to facilitate river transport and fuel delivery; provision of open space and landscaping. (The Amendments include changes to the massing and distribution of land uses in Development Zone RS2 and other consequential changes to facilitate the redevelopment of the adjoining Cringle Dock site). An Environmental Statement has been submitted with the application under the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015. Approve Subject to Legal Agreement CIL 11/11/2015	

<b>Site Name:</b>	<b>Cringle Dock WTS (Cory)</b>
	<p><a href="#">2015/6358</a> Cringle Dock Waste Transfer Station Cringle Street and Battersea Power Station Kirtling Street SW8 Demolition and/or relocation of all buildings and structures on site and the construction of a temporary waste transfer station comprising: a single-storey (double-height) structure to accommodate the waste unloading and compaction facilities; an office building; the provision of a riverside crane; construction of an associated campshed within the River Thames; provision of hard standing areas for waste handling and container storage; provision of new boundary treatments; the creation of vehicular access from Cringle Street and other associated works in connection with the use of the site for a waste transfer station during the associated redevelopment of the Cringle Dock waste transfer station; and the subsequent demolition of the temporary waste transfer station and all associated works. (An Environmental Statement has been submitted with the application under the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015). Approve for a Temporary Period 11/11/2015</p> <p><a href="#">2015/2818</a> Cringle Dock Waste Transfer Station Cringle Street SW8 and Battersea Power Station Kirtling Street SW8 Scoping Opinion for redevelopment of the Cringle Dock Waste Transfer Station in conjunction with the Battersea Power Station Masterplan. The redevelopment would include the enclosure of the redeveloped waste transfer station with a concrete deck, and construction of residential buildings above (up to 17-storeys high), providing approx. 350 residential units and associated parking and open space. The proposals include the construction of temporary waste transfer station, and associated alterations to the massing and locations of the adjacent BPS Masterplan buildings. Scoping Opinion response given 28/07/2015</p> <p><a href="#">2013/3189</a> Cringle Dock Cringle Street SW8 Scoping Opinion for the redevelopment of the Cringle Dock site, including the enclosure of the redeveloped waste transfer station with a concrete deck, and construction of two buildings above (9-storeys and 15-storeys high), providing 515 residential units and associated parking and open space. Scoping Opinion response given 04/07/2013</p> <p><a href="#">2011/3922</a> Land adj Battersea Power Station Kirtling Street SW8 Construction of a single-storey utilities control cabin to provide replacement accommodation for electricity undertaking purposes, on eastern boundary of site adjacent to the Cringle Dock Waste Transfer Station. Approve with Conditions 13/09/2011</p>
<b>Contact with operator</b>	Yes
<b>Opportunity to intensify or upgrade operation</b>	This site is the subject of an outline planning permission to upgrade and modernise the facility. There is no timetable for the redevelopment project. There are no proposals to increase capacity as part of the upgrade.

<b>Site Name:</b>	<b>D Goldsmith</b>	
<b>Site address</b>	D Goldsmith Ltd, 2 Bendon Valley, Tooting, London, SW18 4LZ	
<b>OS grid reference</b>	TQ2588973520	
<b>Site size (ha)</b>	0.04	
<b>Location map</b>		
<b>Site operator</b>	D Goldsmith Ltd (company dissolved)	
<b>Site owner</b>	Not known	
<b>Type of facility</b>	A14 : Transfer Station taking Non-Biodegradable Wastes	
<b>Max throughput</b>	989	
<b>Licensed capacity</b>	2,828	
<b>Permit number</b>	KP3390EH/A001	
<b>Type of waste accepted</b>	Last use: Scrap metal (motor vehicles)	
<b>Management type</b>	Transfer	
<b>Location and surrounding land uses (existing and proposed)</b>	The site is surrounded by a mix of two and three storey office buildings ranging from modern to mid-century. Opposite is a self-storage facility. On the opposite side of Brandon Valley is an Economic Use Intensification Area. The wider area along Garrett Lane includes small-scale town centre uses with residential units above.	
<b>Nature and scale of the facility</b>	This small site is mostly open standing with a small single-storey brick office at the entrance to the site. The site has most recently been used for vehicle parking.	
<b>Access, congestion and road capacity</b>	Access via Bendon Valley which is narrow and unsuitable for large vehicles.	
<b>Opportunity to use rail or waster to transport waste</b>	The River Wandle runs towards the west of the site, but there is not currently infrastructure to support transportation of waste to this site by water.	
<b>Planning policy designation</b>	<b>SIL/LSIA</b>	Lydden Road LSIA
	<b>Safeguarded</b>	Yes
	<b>Opportunity area</b>	No
	<b>Other designations</b>	No

<b>Site Name:</b>	<b>D Goldsmith</b>	
	<b>Air Quality Focus Area</b>	No
	<b>Environmental designations</b>	None
	<b>Flood Affected</b>	Flood Zone 2
	<b>Heritage assets</b>	Archaeological Priority Area
	<b>B1a – C3 Article 4 Area</b>	Yes
<b>Planning history</b>	None	
<b>Contact with operator</b>	No	
<b>Opportunity to intensify or upgrade operation</b>	The site is no longer operating as a waste site.	

<b>Site Name:</b>	<b>European Metal Recycling Ltd</b>	
<b>Site address</b>	Private Sidings, Pensbury Place, Wandsworth, London, SW8 4TP	
<b>OS grid reference</b>	TQ2937876475	
<b>Site size (ha)</b>	0.79	
<b>Location map</b>		
<b>Site operator</b>	European Metal Recycling Ltd	
<b>Site owner</b>		
<b>Type of facility</b>	A19 : Metal Recycling Site (Vehicle Dismantler)	
<b>Max throughput</b>	69,244	
<b>Licensed capacity</b>	81,000	
<b>Permit number</b>	RP3890EL (83490)	
<b>Type of waste accepted</b>	HIC, CDE, Hazardous	
<b>Management type</b>	Recycling	
<b>Location and surrounding land uses (existing and proposed)</b>	This site is located in part of the wider 'Pensbury Place Waste Management Site' which covers a cluster of three waste sites. The site lies in the Queenstown Strategic Industrial Location (SIL) and surrounding uses are of a similar industrial nature.	
<b>Nature and scale of the facility</b>	The site is mostly open standing for storage and sorting of scrap metal, with a weighbridge and reception office, and modern double-storey enclosed shed.	
<b>Access, congestion and road capacity</b>	Access via Pensbury Place.	

<b>Site Name:</b>	<b>European Metal Recycling Ltd</b>	
<b>Opportunity to use rail or waster to transport waste</b>	There are two railheads nearby, including one used by Day Aggregates. There is an opportunity to discuss use of these railheads for transporting waste.	
<b>Planning policy designation</b>	<b>SIL/LSIA</b>	Queenstown Road SIL
	<b>Safeguarded</b>	Yes, part of Pensbury Place Waste Management Site
	<b>Opportunity area</b>	Nine Elms Vauxhall OA
	<b>Other designations</b>	None
	<b>Air Quality Focus Area</b>	No
	<b>Environmental designations</b>	The site is partially located within an area of deficiency in access to nature. The site is partially located within an Open Space Deficiency Area.
	<b>Flood Affected</b>	3a Area benefiting from flood defences
	<b>Heritage assets</b>	The site is partially located within an archaeological priority area and is in close proximity to Heathbrook Park, which is of local historic significance.
<b>B1a – C3 Article 4 Area</b>	Yes	
<b>Planning history</b>	None	
<b>Contact with operator</b>	No	
<b>Opportunity to intensify or upgrade operation</b>	This site has a good throughput for a metal recycling facility of this size, so there are unlikely to be opportunities to intensify operations.	

<b>Site Name:</b>	<b>Pensbury Place Transfer Station (Cory)</b>	
<b>Site address</b>	Pensbury Place Transfer Station 661-679 Pensbury Place Battersea SW8 4TP	
<b>OS grid reference</b>	TQ2930076500	
<b>Site size (ha)</b>	1.1ha	
<b>Location map</b>		
<b>Site operator</b>	Cory Environmental Ltd	
<b>Site owner</b>	Network Rail Property Commercial Estate and Day Group Limited	

<b>Site Name:</b>	<b>Pensbury Place Transfer Station (Cory)</b>	
<b>Type of facility</b>	A11 : Household, Commercial & Industrial Waste T Stn	
<b>Max throughput</b>	175,000 (new permission)	
<b>Licensed capacity</b>	182,000	
<b>Permit number</b>	BP3799EL/A001	
<b>Type of waste accepted</b>	HIC, C&I, C&D	
<b>Management type</b>	Transfer with some bulking of waste for recycling	
<b>Location and surrounding land uses (existing and proposed)</b>	This site is located in part of the wider 'Pensbury Place Waste Management Site' which covers a cluster of three waste sites. The site lies in the Queenstown Strategic Industrial Location (SIL) and surrounding uses are of a similar industrial nature.	
<b>Nature and scale of the facility</b>	The site is currently hardstanding with cabins, gatehouse, weighbridge and enclosed waste transfer station. The proposed replacement WTS building has a larger footprint.	
<b>Access, congestion and road capacity</b>	Access is via Pensbury Place.	
<b>Opportunity to use rail or waster to transport waste</b>	There are two railheads nearby, including one used by Day Aggregates. There is an opportunity to discuss use of these railheads for transporting waste.	
<b>Planning policy designation</b>	<b>SIL/LSIA</b>	Queenstown SIL
	<b>Safeguarded</b>	Yes, part of the Pensbury Place Waste Management Site
	<b>Opportunity area</b>	Nine Elms Vauxhall OA
	<b>Other designations</b>	None
	<b>Air Quality Focus Area</b>	No
	<b>Environmental designations</b>	The site is partially located within an area of deficiency in access to nature. The site is partially located within an Open Space Deficiency Area.
	<b>Flood Affected</b>	3a Area benefiting from flood defences
	<b>Heritage assets</b>	The site is partially located within an archaeological priority area and is in close proximity to Heathbrook Park, which is of local historic significance
	<b>B1a – C3 Article 4 Area</b>	Yes
<b>Planning history</b>	<p><a href="#">2018/1959</a> Pensbury Place Transfer Station 661-679 Pensbury Place Battersea SW8 4TP The construction and operation of a replacement waste transfer building, a mess room, office/welfare facility, a weighbridge and office building, water tank and pump house including the extension of the permitted use to allow for 24-hour operation. An Environmental Statement has been submitted under The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Approve with Conditions CIL Liable 18/07/2019</p> <p><a href="#">2017/1219</a> Wandsworth Solid Transfer Station Pensbury Place SW8 4TR Extension to existing single-storey portacabin located in the south of the site to create a second storey. Approve with Conditions 17/05/2017</p>	

<b>Site Name:</b>	<b>Pensbury Place Transfer Station (Cory)</b>
	<p><a href="#">2012/1019</a> Wandsworth Solid Waste Transfer Station, Pensbury Place SW8 Erection of 3 metre high dust suppression sheeting above the existing palisade fencing to an overall height of 5.4 metres. Approve with Conditions 11/05/2012</p> <p><a href="#">2006/1554</a> Worlds End Waste Arches 661 679 Pensbury Place SW8 Use of land to east and south-east of the authorised waste transfer station to provide an enlarged transfer station, together with the retention of four existing ancillary portakabin-type buildings and weighbridge, with access from Pensbury Place. Approve with Conditions 27/06/2006</p>
<b>Contact with operator</b>	No
<b>Opportunity to intensify or upgrade operation</b>	Yes, the site is being upgraded and intensified through planning permission 2017/1219 and this has been taken into account when considering Wandsworth's existing capacity.

<b>Site Name:</b>	<b>Smugglers Way facilities (WRWA / Cory)</b>
<b>Site address</b>	Smugglers Way, Wandsworth, London SW18 1EG
<b>OS grid reference</b>	TQ256754 TQ256752
<b>Site size (ha)</b>	3.4ha
<b>Location map</b>	
<b>Site operator</b>	Cory Environmental Ltd
<b>Site owner</b>	Western Riverside Waste Authority
<b>Type of facility</b>	A15 : Material Recycling Treatment Facility A9 : Haz Waste Transfer Station
<b>Max throughput</b>	MRF: 72,683 SWTS: 221,633
<b>Licensed capacity</b>	MRF: 84,000 SWTS: 893,637
<b>Permit number</b>	MRF: FP3598VA (101352) SWTS: KP3690EV (83283)

<b>Site Name:</b>	<b>Smugglers Way facilities (WRWA / Cory)</b>	
<b>Type of waste accepted</b>	HIC	
<b>Management type</b>	Treatment/Recycling and Transfer	
<b>Location and surrounding land uses (existing and proposed)</b>	The site is located on the north side of Smugglers Way. To the east is Waterside Path pedestrian walkway and residential development. To the south on the opposite side of smugglers way is the one way arm of smugglers way, and warehouse/industrial premises.	
<b>Nature and scale of the facility</b>	The WRWA / Cory Smugglers Way facilities comprise a Materials Recycling Facility (MRF), Solid Waste Transfer Station (SWTS) and Household Waste Recycling Centre (HWRC). The facility includes large triple-storey enclosed units, covered areas, offices and hardstanding.	
<b>Access, congestion and road capacity</b>	Access is via Smugglers Way and suitable for large vehicles.	
<b>Opportunity to use rail or waster to transport waste</b>	Yes, the site lies adjacent to Feathers Wharf and the Thames.	
<b>Planning policy designation</b>	<b>SIL/LSIA</b>	No
	<b>Safeguarded</b>	Yes
	<b>Opportunity area</b>	Wandle Delta Area Spatial Strategy
	<b>Other designations</b>	Thames Policy Area Safeguarded Wharves Decentralised Energy Opportunities Employment Protection Area
	<b>Air Quality Focus Area</b>	No
	<b>Environmental designations</b>	None
	<b>Flood Affected</b>	Flood Zone 3 Area benefiting from flood defences
	<b>Heritage assets</b>	Archaeological Priority Area
	<b>B1a – C3 Article 4 Area</b>	No
<b>Planning history</b>	<p><a href="#">2018/5569</a> Waste Disposal Site, Western Riverside Waste Authority Civic Amenity Site Smugglers Way SW18 1JS Alterations to office building including installation of replacement windows, infilling of porch to provide additional wc and wheelchair access. Approve with Conditions 07/03/2019</p> <p><a href="#">2017/4291</a> Western Riverside Waste Authority Transfer Station Waste Disposal Site Smugglers Way SW18 1EG Installation of a replacement fire suppression water tank (6.1m diameter by 9.67m high). Approve with Conditions 13/09/2017</p> <p><a href="#">2012/1019</a> Wandsworth Solid Waste Transfer Station, Pensbury Place SW8 Erection of 3 metre high dust suppression sheeting above the existing palisade fencing to an overall height of 5.4 metres. Approve with Conditions 11/05/2012</p> <p><a href="#">2010/0066</a> Waste Disposal Site Smugglers Way SW18 1EG</p>	

<b>Site Name:</b>	<b>Smugglers Way facilities (WRWA / Cory)</b>
	<p>Use of redundant eastern dust plant room at the north-east corner of the main waste transfer building and use of the existing rooms underneath the existing eastern pedestrian walkway ramp as workshop facilities to provide a re-use area to recycle up to approximately 5000 tonnes per annum of material that is already currently handled by WRWA. Approve No Conditions 23/02/2010</p> <p><a href="#">2009/1239</a> Civic Amenity Site Smugglers Way SW18 Replacement of existing Civic Amenity facility with a building with open sides to south and west elevations for use as a Civic Amenity facility including revised public access/queuing arrangements to the east of the proposed building. Revised staff car parking layout for Waste Transfer Station/Materials Recycling Facility. Use of Feathers Wharf as a temporary Civic Amenity facility, for up to 12 months from commencement of construction. Approve with Conditions 09/07/2009</p> <p><a href="#">2006/4988</a> Waste Transfer Station Smugglers Way SW18 Replacement of 14.6m high crane no. 2 at the Smugglers Way Wharf, with new 23m high crane. Approve with Conditions 12/01/2007</p> <p><a href="#">2003/2993</a> Western Riverside Transfer Station Smugglers Way SW18 Erection of an extension (up to 25m high x 112m long x 55m wide) to the southern side of the existing Waste Transfer Station (WTS) to provide a new Materials Recycling Facility (MRF). Provision of a new exit ramp from the WTS and MRF and associated car parking. The use of the Feathers Wharf site to the west of the WTS as a constructors laydown area and for bulk recycling activities for a two-year period from the commencement of construction of the MRF. Approve with Conditions 31/08/2006</p>
<b>Contact with operator</b>	Yes
<b>Opportunity to intensify or upgrade operation</b>	There are currently no plans to intensify operations or upgrade the facility.

<b>Site Name:</b>	<b>Wandsworth Transfer Station (Suez)</b>
<b>Site address</b>	British Rail Goods Yard, Pensbury Place, Wandsworth, London SW8 4TR
<b>OS grid reference</b>	TQ2930076400
<b>Site size (ha)</b>	0.17

<b>Site Name:</b>	<b>Wandsworth Transfer Station (Suez)</b>	
<b>Location map</b>		
<b>Site operator</b>	Suez Recycling & Recovery South East Ltd	
<b>Site owner</b>	Suez Recycling & Recovery South East Ltd	
<b>Type of facility</b>	A11 : Household, Commercial & Industrial Waste T Stn	
<b>Max throughput</b>	29,738	
<b>Licensed capacity</b>	237,250	
<b>Permit number</b>	AB3700GY (83393)	
<b>Type of waste accepted</b>	HIC, CDE	
<b>Management type</b>	Transfer with some recycling	
<b>Location and surrounding land uses (existing and proposed)</b>	This site is located in part of the wider 'Pensbury Place Waste Management Site' which covers a cluster of three waste sites. The site lies in the Queenstown Strategic Industrial Location (SIL) and surrounding uses are of a similar industrial nature.	
<b>Nature and scale of the facility</b>	The majority of the site is hard standing with open storage of waste.	
<b>Access, congestion and road capacity</b>	Access via Pensbury Place	
<b>Opportunity to use rail or waster to transport waste</b>	There are two railheads nearby, including one used by Day Aggregates. There is an opportunity to discuss use of these railheads for transporting waste.	
<b>Planning policy designation</b>	<b>SIL/LSIA</b>	Queenstown SIL
	<b>Safeguarded</b>	Yes, part of the Pensbury Place Waste Management Site
	<b>Opportunity area</b>	Nine Elms Vauxhall OA
	<b>Other designations</b>	None
	<b>Air Quality Focus Area</b>	No
	<b>Environmental designations</b>	The site is partially located within an area of deficiency in access to nature. The site is partially located within an Open Space Deficiency Area.
	<b>Flood Affected</b>	3a Area benefiting from flood defences
	<b>Heritage assets</b>	The site is partially located within an archaeological priority area and is in close proximity to Heathbrook Park, which is of local historic significance
	<b>B1a – C3 Article 4 Area</b>	Yes

<b>Site Name:</b>	<b>Wandsworth Transfer Station (Suez)</b>
<b>Planning history</b>	<p><a href="#">2017/1219</a> Wandsworth Solid Transfer Station Pensbury Place SW8 4TR Extension to existing single-storey portacabin located in the south of the site to create a second storey. Approve with Conditions 17/05/2017</p> <p><a href="#">2012/1019</a> Wandsworth Solid Waste Transfer Station, Pensbury Place SW8 Erection of 3 metre high dust suppression sheeting above the existing palisade fencing to an overall height of 5.4 metres. Approve with Conditions 04/05/2012</p>
<b>Contact with operator</b>	Yes
<b>Opportunity to intensify or upgrade operation</b>	There may be an opportunity for the Suez WTS to increase its throughput by extending its operational hours to 24/7, which is allowed by the extant planning permission. However, Suez do not currently have any plans to do so.

<b>Site Name:</b>	<b>The Willows MRF</b>
<b>Site address</b>	Cappagh Public Works Ltd, The Willows Materials Recycling Facility, Riverside Road, London SW17 0BA
<b>OS grid reference</b>	TQ259719
<b>Site size (ha)</b>	0.57 ha
<b>Location map</b>	
<b>Site operator</b>	Cappagh Public Works Ltd
<b>Site owner</b>	
<b>Type of facility</b>	A15 : Material Recycling Treatment Facility
<b>Max throughput</b>	73,114
<b>Licensed capacity</b>	499,999
<b>Permit number</b>	AP3495VU (100829)
<b>Type of waste accepted</b>	CDE
<b>Management type</b>	Treatment / Recycling

<b>Site Name:</b>	<b>The Willows MRF</b>	
<b>Location and surrounding land uses (existing and proposed)</b>	The site is bounded by industrial sites typical of an area of industrial importance. All immediate surrounding uses are non-residential. The River Wandle runs to the west of the site.	
<b>Nature and scale of the facility</b>	The site is mostly hardstanding with open storage of waste.	
<b>Access, congestion and road capacity</b>	Access via Riverside Road	
<b>Opportunity to use rail or waster to transport waste</b>	The River Wandle runs to the west of the site, but there is not currently infrastructure to support transportation of waste to this site by water.	
<b>Planning policy designation</b>	<b>SIL/LSIA</b>	Summerstown LSIA
	<b>Safeguarded</b>	Yes
	<b>Opportunity area</b>	No
	<b>Other designations</b>	No
	<b>Air Quality Focus Area</b>	No
	<b>Environmental designations</b>	The site is partially located within an Open Space Deficiency Area. The site is located adjacent to the Wandle Valley Regional Park.
	<b>Flood Affected</b>	Flood Zone 2
	<b>Heritage assets</b>	No
	<b>B1a – C3 Article 4 Area</b>	Yes
<b>Planning history</b>	<a href="#">2009/3889</a> The Willows Riverside Road SW17 Certificate of Lawfulness - Existing Use of land for the importing, sorting, picking, crushing and trommel screening of between 380,000 tonnes and 500,000 tonnes per annum of mixed construction demolition and excavation waste; the storage processing and distribution of materials for recycling contained within such mixed construction demolition and excavation waste and the storage, processing and distribution of the residual materials contained within such mixed construction demolition and excavation waste. Approve No Conditions 26/11/2009	
<b>Contact with operator</b>	Email sent	
<b>Opportunity to intensify or upgrade operation</b>		

## Appendix B: Exports Tables

The following are up-to-date tables for each waste planning authority which received significant waste exports from Wandsworth over the last five years. These tables can be used for the duty to co-operate engagement.

### Wandsworth exports to Buckinghamshire

Site name	Site type	Waste	2014	2015	2016	2017	2018
Gerrards Cross Landfill	Landfill	CDE	5,420	642	2,380	1,822	0
Park Lodge Landfill Site	Landfill	CDE	165	3,272	0	0	0
Total	All	CDE	5,585	3,914	2,381	1,846	1,381
Total	All	HIC	0	0	1	37	89

Source: Waste Data Interrogator 2014-2018

### Hazardous waste exports from Wandsworth to Cambridgeshire & Peterborough

WPA	Description	Source	2014	2015	2016	2017	2018
Cambridgeshire & Peterborough	Mainly C&D Waste and Asbestos	HWDI	217	912	834	1,424	2,538
	Thornhaugh Landfill Site	WDI	0	18	0	24	31

Source: Hazardous Waste Data Interrogator 2014-2018

### Hazardous waste exports from Wandsworth to Derbyshire

WPA	Description	Source	2014	2015	2016	2017	2018
Derbyshire	Mainly Not Otherwise Specified	HWDI	251	200	375	244	103
	Norwood Recycling Centre	WDI	4	0	0	0	-

Source: Hazardous Waste Data Interrogator 2014-2018

### Hazardous waste exports from Wandsworth to Dudley

WPA	Description	Source	2014	2015	2016	2017	2018
Dudley	N/A	HWDI	0	0	2,280	0	0
	N/A	WDI	-	-	-	-	-

Source: Hazardous Waste Data Interrogator 2014-2018

### Wandsworth exports to East London (Havering)

Site name	Site type	Waste	2014	2015	2016	2017	2018
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Frog Island	Treatment	CDE	0	0	4,366	5,384	4,607
PLA Silt Lagoons	On/In Land	CDE	0	0	7,559	0	9,252
Rainham Jetty WTS	Transfer	CDE	8,637	0	3,918	12,794	0
Rainham Landfill	Landfill	CDE	73,351	30,465	184,158	25,788	20,348
Rainham MRF	Treatment	HIC	1,968	6,513	0	0	0
Veolia Inert Soils	Treatment	CDE	16,208	6,448	1,292	0	0
Total	All	CDE	100,791	38,448	201,473	44,207	34,590
Total	All	HIC	4,294	6,855	210	21	194

Source: Waste Data Interrogator 2014-2018

#### Hazardous waste exports from Wandsworth to East London (Havering and Newham)

WPA	Description	Source	2014	2015	2016	2017	2018
East London (Havering and Newham)	Mainly C&D Waste and Asbestos	HWDI	379	3,237	10,017	22,500	811
	Waste Transfer Station, Silvertown	WDI	0	0	0	24	39
	Williams Environmental Management	WDI	44	11	32	-	-

Source: Hazardous Waste Data Interrogator 2014-2018

#### Wandsworth exports to Essex

Site name	Site type	Waste	2014	2015	2016	2017	2018
Highwood Quarry Inert Landfill	Landfill	CDE	0	3,879	0	1,917	2,396
Pitsea Landfill	Landfill	CDE	21	1,819	2,480	4,574	1,251
Total	All	CDE	33	5,697	2,480	6,559	3,656
Total	All	HIC	0	46	0	0	0

Source: Waste Data Interrogator 2014-2018

#### Wandsworth exports to Greenwich

Site name	Site type	Waste	2014	2015	2016	2017	2018
Charlton Recycling Facility	Treatment	CDE	0	0	0	4,156	29,722
Victoria Deep Water Terminal	Treatment	CDE	29,058	31,480	48,685	52,462	0
Victoria Deep Water Terminal	Treatment	HIC	1,949	1,341	523	0	0
Tunnel Wharf	Treatment	CDE					8,312
Total	All	CDE	29,058	31,480	48,685	56,617	38,34

Total	All	HIC	1,949	1,341	523	0	2
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Source: Waste Data Interrogator 2014-2018

#### Hazardous waste exports from Wandsworth to Greenwich

WPA	Description	Source	2014	2015	2016	2017	2018
Greenwich	Mainly Oil and Oil/Water Mixtures	HWDI	81	83	109	125	126
	N/A	WDI	-	-	-	-	-

Source: Hazardous Waste Data Interrogator 2014-2018

#### Hazardous waste exports from Wandsworth to Hammersmith and Fulham

WPA	Description	Source	2014	2015	2016	2017	2018
Hammersmith and Fulham	Mainly Municipal and Similar Commercial Wastes	HWDI	452	469	399	479	473
	N/A	WDI	-	-	-	-	-

Source: Hazardous Waste Data Interrogator 2014-2018

#### Wandsworth exports to Hampshire

Site name	Site type	Waste	2014	2015	2016	2017	2018
Warren Heath Recycling Facility	Treatment	CDE	0	36	5,890	634	384
Total	All	CDE	244	42	5,893	634	387
Total	All	HIC	0	11	9	94	299

Source: Waste Data Interrogator 2014-2018

#### Hazardous waste exports from Wandsworth to Hertfordshire

WPA	Description	Source	2014	2015	2016	2017	2018
Hertfordshire	Mainly Oil and Oil/Water Mixtures	HWDI	31	41	226	74	37
	Redbournbury Treatment Plant	WDI	35	16	15	41	8

Source: Hazardous Waste Data Interrogator 2014-2018

#### Wandsworth exports to Hillingdon (West London)

Site name	Site type	Waste	2014	2015	2016	2017	2018
Sipson North East Inert Landfil	Landfill	CDE	3,882	5,685	7,761	11,295	2,400

Total	All	CDE	3,882	5,685	7,761	11,295	2,400
Total	All	HIC	1,689	0	0	0	0

Source: Waste Data Interrogator 2014-2018

#### Hazardous waste exports from Wandsworth to Kent

WPA	Description	Source	2014	2015	2016	2017	2018
Kent	Mix of different waste types	HWDI	1,143	895	1,147	1,042	1,201
	Larkfield Clinical Waste Facility	WDI	30	126	140	60	81
	Safetykleen U K	WDI	0	0	20	80	6
	Sweep Kuusakoski Ltd	WDI	0	0	16	16	525
	Unit D2 Springhead Enterprise Park	WDI	0	0	1	4	4

Source: Hazardous Waste Data Interrogator 2014-2018

#### Hazardous waste exports from Wandsworth to Medway

WPA	Description	Source	2014	2015	2016	2017	2018
Medway	Mainly Healthcare	HWDI	928	859	1,524	1,495	1,363
	Rochester Clinical Waste Treatment Facility	WDI	352	772	1,435	1,417	1,429
	Eco-oil Ltd	WDI	1	1	0	0	-
	Kingsnorth Oil	WDI	8	25	0	0	-

Source: Hazardous Waste Data Interrogator 2014-2018

#### Wandsworth exports to Merton (South London)

Site name	Site type	Waste	2014	2015	2016	2017	2018
Waste Transfer And Recovery Facility	Treatment	CDE	10,187	5,136	6,577	10,526	10,386
Total	All	CDE	10,187	5,136	6,577	10,526	10,386
Total	All	HIC	0	0	0	0	0

Source: Waste Data Interrogator 2014-2018

#### Hazardous waste exports from Wandsworth to North London (Enfield)

WPA	Description	Source	2014	2015	2016	2017	2018
North London (Enfield)	Mainly Healthcare	HWDI	512	513	7	6	8
	Chase Farm Clinical Waste	WDI	0	579	0	0	-

	Treatment Facility						
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Source: Hazardous Waste Data Interrogator 2014-2018

#### Hazardous waste exports from Wandsworth to Northamptonshire

WPA	Description	Source	2014	2015	2016	2017	2018
Northamptonshire	Mainly C&D Waste and Asbestos	HWDI	7,269	5,018	6,892	2,238	74
	East Northants RM Facility	WDI	236	1,554	397	1,972	-

Source: Hazardous Waste Data Interrogator 2014-2018

#### Hazardous waste exports from Wandsworth to Nottinghamshire

WPA	Description	Source	2014	2015	2016	2017	2018
Nottinghamshire	Mainly Oil and Oil/Water Mixtures	HWDI	41	66	98	105	101
	N/A	WDI	-	-	-	-	-

Source: Hazardous Waste Data Interrogator 2014-2018

#### Wandsworth exports to OPDC (Ealing)

Site name	Site type	Waste	2014	2015	2016	2017	2018
Willesden Freight Terminal	Transfer	CDE	3,083	100,663	63,400	1,172	102
Total	All	CDE	3,083	100,663	63,400	1,172	102
Total	All	HIC	0	0	0	0	0

Source: Waste Data Interrogator 2014-2018

#### Hazardous waste exports from Wandsworth to Sandwell

WPA	Description	Source	2014	2015	2016	2017	2018
Sandwell	Mix of different waste types	HWDI	28	5	12	2	2,616
	Edwin Richards Quarry - Soil Treatment Centre	WDI	0	0	0	4,431	1,429
	Wednesbury WM Resource Centre	WDI	0	0	0	1	-

	MTB (Midlands) Ltd	WDI	21	0	0	0	-
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Source: Hazardous Waste Data Interrogator 2014-2018

#### Wandsworth exports to Slough

Site name	Site type	Waste	2014	2015	2016	2017	2018
Horton Brook Quarry	Landfill	CDE	750	4,485	3,480	9,585	15
Total	All	CDE	848	4,635	3,802	9,657	42
Total	All	HIC	259	510	579	521	410

Source: Waste Data Interrogator 2014-2018

#### Hazardous waste exports from Wandsworth to Staffordshire

WPA	Description	Source	2014	2015	2016	2017	2018
Staffordshire	Mainly C&D Waste and Asbestos	HWDI	5	8	198	12	7
	P R M Green Technologies Ltd	WDI	0	1	9	4	2
	Stone Computers Limited	WDI	4	4	9	2	4

Source: Hazardous Waste Data Interrogator 2014-2018

#### Wandsworth exports to Surrey

Site name	Site type	Waste	2014	2015	2016	2017	2018
Addlestone Quarry	Landfill	CDE	0	4,618	30,866	12,528	0
Hithermoor Recycling and Recovery Facility	Treatment	CDE	0	0	3,722	0	0
Home Farm Extension Landfill Site	Landfill	CDE	4,183	25,856	5,899	0	0
Land At Cranleigh Brick & Tile Co Ltd	On/In Land	CDE	0	0	0	4,533	23,870
Redhill Landfill (NEQ)	Landfill	CDE	52,274	31,926	20,992	35,666	879
Stanwell 111 Aggregate Recycling Facility	Treatment	CDE	3,130	8,250	20,318	4,572	18,950
Stanwell III Landfill	Landfill	CDE	2,200	1,128	0	1,476	0
All other facilities							1
Total	All	CDE	62,655	72,657	82,896	60,602	44,092
Total	All	HIC					1

Source: Waste Data Interrogator 2014-2018

#### Hazardous waste exports from Wandsworth to Surrey

WPA	Description	Source	2014	2015	2016	2017	2018
Surrey	Mainly C&D Waste and Asbestos	HWDI	15,585	303	2,422	4,557	60
	Infinet House	WDI	0	0	9	1	0
	Redhill Landfill (North East Quadrant)	WDI	7	0	0	0	-

Source: Hazardous Waste Data Interrogator 2014-2018

#### Wandsworth exports to Thurrock

Site name	Site type	Waste	2014	2015	2016	2017	2018
East Tilbury Quarry	Landfill	CDE	9,270	28,117	1,561	42,300	38,202
East Tilbury Quarry	Transfer	CDE	22,769	1,458	19,473	8,219	27,263
Berth 5, Port Of Tilbury London	Transfer	CDE	0	0	22,000	0	
Ockendon Area II & III Landfill	Landfill	CDE	0	0	3,348	1,407	41
Land At North Tilbury	On/In Land	CDE	12,840	11,020	0	0	0
Total	All	CDE	44,879	40,595	46,383	52,017	82,415
Total	All	HIC	63	36	79	313	1,198

Source: Waste Data Interrogator 2014-2018

#### Wandsworth exports to West Sussex

Site name	Site type	Waste	2014	2015	2016	2017	2018
Sweeptech Recycling Park	Treatment	HIC	0	3,956	4,331	3,608	5,045
Park Farm Cottage	Use of Waste	CDE	3,964	0	0	0	0
Total	All	CDE	4,156	0	658	16	0
Total	All	HIC	0	3,957	4,332	3,608	5,046

Source: Waste Data Interrogator 2014-2018

#### Hazardous waste exports from Wandsworth to Wiltshire

WPA	Description	Source	2014	2015	2016	2017	2018
Wiltshire	Mainly C&D Waste and Asbestos	HWDI	95	17	681	9	2
	N/A	WDI	-	-	-	-	-

Source: Hazardous Waste Data Interrogator 2014-2018

#### Wandsworth exports to Windsor and Maidenhead

Site name	Site type	Waste	2014	2015	2016	2017	2018
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Kingsmead Landfill	Landfill	CDE	0	0	0	30,960	4,410
Total	All	CDE	0	0	0	30,960	4,410
Total	All	HIC	2	25	0	0	0

Source: Waste Data Interrogator 2014-2018

## Appendix C: Duty to Co-operate Responses June 2017

Waste Planning Authority	Type of waste	Response
Bexley	HIC	<p>Thank you for your letter regarding the duty to co-operate with regards to the importing and exporting of waste. Appendix 1 to your letter sets out these movements between Bexley and the WRWA area.</p> <p>Whilst no comment is made as to the waste imported into the area from Bexley, your letter notes, “The movement of this residual waste to Bexley is subject to a 25 year WRWA contract with Cory Environmental. It is therefore important that the WRWA boroughs understand if there are any planning reasons why these waste movements cannot continue over this period.”</p> <p>However, the 25 year period has not been specified. Nonetheless, the two waste management facilities identified in Appendix 1 have both been safeguarded as sites that are of strategic importance to Bexley meeting its waste apportionment requirements. As such, there are no planning reasons why the waste movements from the WRWA area cannot continue into the future.</p>
East London (Havering, Newham)	HIC CD&E	No response
RB Greenwich	CD&E	No response
South London (Merton)	CD&E	<p>Thank you for your letter of 10 May. I am replying on behalf of the London Borough of Sutton, which is one of the boroughs of the South London Waste Plan. In answer to your specific questions:</p> <p><b>Do you agree with the thresholds used for identifying “significant” quantities of waste?</b> Yes.</p>

Waste Planning Authority	Type of waste	Response
		<p><b>Do you consider the total waste movements between your authority area and the WPAs in the WRWA area set out in appendix 1 of this letter to be accurate for all waste streams identified? If not, please provide alternative figures or sources?</b>  Yes. The Environment Agency’s Waste Data Interrogator is the only source for waste movement data.</p> <p><b>Any there any planning reasons as to why these waste movements cannot continue in the future? Eg site closures, limited capacity etc</b>  I would assume that:  ☒☒The compost export from Lambeth to Sutton would continue as I am not aware of any plans for the Cic composting facility to close or relocate  ☒☒The H, C&amp;I export from Lambeth to Sutton is likely to be to a dry recyclables transfer station for bulking up prior to movement to Kent. This may continue.  ☒☒The C, D and E import from Sutton to Wandsworth may continue. However, C, D and E waste movements are often subject to short-term contractual arrangements</p> <p><b>Is there any new waste treatment capacity being created/allocated in your planning area, please provide details of the treatment facility, type and overall capacity and the stage of plan preparation you are at?</b>  The boroughs of the South London Waste Plan (Croydon, Kingston, Merton and Sutton) adopted the South London Waste Plan in March 2012. It safeguards existing sites and identifies areas suitable for waste management (as very few potential sites could be identified). The plan can be found at: <a href="https://www.sutton.gov.uk/downloads/file/1416/south_london_waste_plan">https://www.sutton.gov.uk/downloads/file/1416/south_london_waste_plan</a>.  The boroughs also periodically produce a monitoring report. This sets out new waste applications and permissions across the four boroughs. This can be found at: <a href="https://drive.google.com/drive/u/0/folders/0B5I397zoXtVQNXNTWIBkLXpWM3M">https://drive.google.com/drive/u/0/folders/0B5I397zoXtVQNXNTWIBkLXpWM3M</a> - Document L4.O.  The document should be read carefully for while the record for permitting waste management</p>

Waste Planning Authority	Type of waste	Response																																																														
		<p>development is good, the actual performance of waste capacity build out is poor and actual waste management tonnage, according to the EA Waste Data Interrogator, is in decline. Therefore, the four boroughs may struggle to meet their 2021 throughput target with only four years of the plan period to go.</p> <p><b>Do you have any general comments on the waste movements identified in the WRWA WPAs?</b></p> <p>No.</p>																																																														
Southwark	HIC	No response																																																														
Surrey	CD&E	<p>Thank you for the opportunity to comment on waste movements between Surrey and the Western Riverside Waste Planning Authorities. Apologies for the delay our response is outlined below:</p> <ul style="list-style-type: none"> <li>The data provided was only for Reigate and Banstead which is not actually a WPA. This is an error in the WDI and we have tried to address this issue with the EA. Please find the amended figures below:</li> </ul> <p>2014</p> <table border="1"> <thead> <tr> <th rowspan="2">WPA</th> <th colspan="4">Exports from Surrey</th> <th colspan="4">Imports to Surrey</th> </tr> <tr> <th>Inert</th> <th>HIC</th> <th>Haz</th> <th>HAZ WDI</th> <th>Inert</th> <th>HIC</th> <th>Haz</th> <th>HAZ WDI</th> </tr> </thead> <tbody> <tr> <td>Hammersmith and Fulham</td> <td>0</td> <td>0</td> <td>0</td> <td>843.095</td> <td>5029.92</td> <td>4.14</td> <td>3.79</td> <td>3705.305</td> </tr> <tr> <td>Kensington and Chelsea</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>28207.48</td> <td>0</td> <td>2.285</td> <td>227.5681</td> </tr> <tr> <td>Lambeth</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>28207.48</td> <td>0</td> <td>3.275</td> <td>812.4914</td> </tr> <tr> <td>Wandsworth</td> <td>10570</td> <td>0</td> <td>0</td> <td>0</td> <td>62654.66</td> <td>281.55</td> <td>7.055</td> <td>15584.93</td> </tr> <tr> <td>Totals</td> <td>10570</td> <td>0</td> <td>0</td> <td>843.095</td> <td>124099.5</td> <td>285.69</td> <td>16.405</td> <td>20330.29</td> </tr> </tbody> </table>	WPA	Exports from Surrey				Imports to Surrey				Inert	HIC	Haz	HAZ WDI	Inert	HIC	Haz	HAZ WDI	Hammersmith and Fulham	0	0	0	843.095	5029.92	4.14	3.79	3705.305	Kensington and Chelsea	0	0	0	0	28207.48	0	2.285	227.5681	Lambeth	0	0	0	0	28207.48	0	3.275	812.4914	Wandsworth	10570	0	0	0	62654.66	281.55	7.055	15584.93	Totals	10570	0	0	843.095	124099.5	285.69	16.405	20330.29
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Wandsworth	5984	0	0	0	72656.56	0	0.15	302.7545																																															
Thurrock	CD&E	Thurrock Council welcomes the opportunity to engage actively and on an ongoing basis on the matter of waste movements which remains a planning issue of cross boundary significance for Thurrock and in particular with adjoining waste authorities and those in London. Thurrock Council																																																					

Waste Planning Authority	Type of waste	Response
		<p>requests to be consulted and engaged on any other matters relating to cross boundary waste flows which should be considered under the Duty to Cooperate.</p> <p>I refer to your specific issues raised regarding waste movements and make the following comments. Thurrock Council has also made similar comments as part of representations on recent consultations stages on the Hammersmith and Fulham, Kensington and Chelsea and Lambeth local plans.</p> <p><b>Do you agree with the thresholds used for identifying ‘Significant’ quantities of waste?</b></p> <p>Thurrock has no specific comment on the thresholds identified as ‘significant’ for each of the waste streams.</p> <p><b>Do you consider the total waste movements between your authority area and the WPA’s in the WRWA area set out in appendix 1 of this letter to be accurate for all waste streams identified? If not please provide alternative figures or sources.</b></p> <p>At this stage Thurrock Council is not able to verify the tonnages set out by the WRWA in Appendix 1 as an accurate assessment of waste movements between Thurrock and the WPA’s in the WRWA. However Thurrock Council has no reason not to assume that some quantities of C,D&amp;E waste were imported into Thurrock from the WPA’s in the WRWA area.</p> <p>In the latter half of 2017 Thurrock Council will be undertaking a detailed assessment of waste movements and capacity and will be in a better position to confirm the accuracy of waste imports to and exports from the Borough. Thurrock Council will carry out further consultation on this matter with the London Borough’s and Waste authorities under the Duty to Cooperate.</p> <p><b>Are there any planning reasons as to why these waste movements cannot continue in the future? E.g. site closures, limited capacity etc.</b></p> <p>Yes.</p> <p>The following comments have also been sent to individual London Boroughs across London in respect to consultations on their local plans and also to the NLWP waste planning authorities.</p> <p>It is recognised that C,D&amp;E wastes have been a significant amount of waste exported from London boroughs and other authorities in recent years to Thurrock.</p>

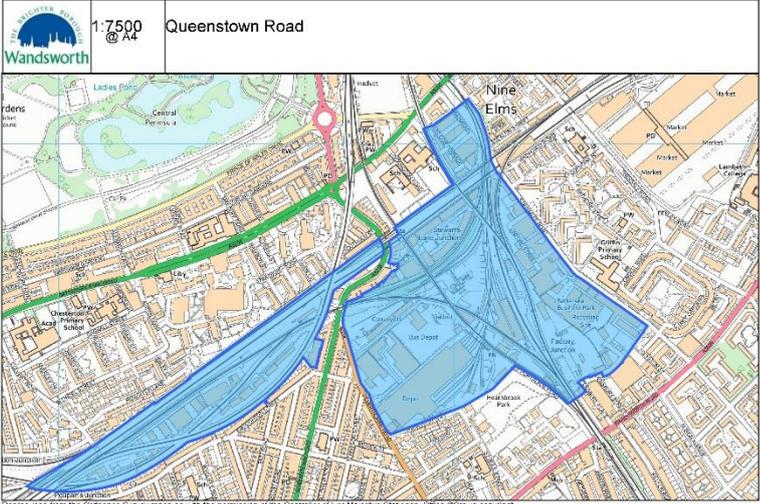
Waste Planning Authority	Type of waste	Response
		<p>However it cannot be assumed that current or previous tonnage quantities of C,D&amp;E waste can continue to be received from the London Boroughs/Waste Authority areas or any other waste authorities to Thurrock during the remainder of the current plan period or beyond (in any proposed local plans) for the following reasons:</p> <ol style="list-style-type: none"> <li>1. Unless subject to contract the existing inert landfill capacity identified in the Thurrock plan is not specifically apportioned for London authorities.</li> <li>2. The Thurrock adopted Core Strategy identifies specific Inert landfill capacity for meeting equivalent to local requirements and does not plan for additional capacity or apportionment of London C,D&amp;E waste during the plan period to 2026 or beyond.</li> <li>3. Most landfill sites operating and receiving C,D&amp;E waste in Thurrock are planned to close by 2020 with only one operational site at present planned to continue during the plan period to 2026.</li> <li>4. There remains uncertainty over two mothballed mineral sites and the future availability of consented and potential void capacity at these sites.</li> <li>5. Uncertainty regarding the levels of capacity or confirmation regarding data.</li> <li>6. Unless contracted any waste export from the WRWA will be potentially competing for sites to receive such waste within the wider south east; from major construction and excavation projects in London and wider south east areas; waste arisings for export in other waste plans in London as well as other waste requirements of the authorities in Thurrock and the East of England themselves.</li> </ol> <p><b>Is there any new waste treatment capacity being created/allocated in your planning area, please provide details of the treatment facility type and overall capacity and the stage of plan preparation you are at?</b></p> <p>Thurrock Borough Council - Waste Planning context  Thurrock Council is a unitary authority and the waste planning policies are included in the adopted Core Strategy of 2011. These policies are relevant for Thurrock until the Core Strategy is replaced.  Thurrock Council is beginning to prepare a new Local Plan that will include a waste planning strategy and policies that will have a period up to 2037-40.</p>

Waste Planning Authority	Type of waste	Response
		<p>The preparation of the new Thurrock Local Plan is at an early stage with a second Issues and options stage anticipated for consultation in autumn 2017. Thurrock will be undertaking a new waste arising and capacity study to inform the new local plan. Under duty to cooperate arrangements Thurrock Council will wish to discuss with authorities any waste planning matters and new technical evidence base for Thurrock as it emerges.</p> <p>LACW and C&amp;I waste.</p> <p>In respect of Thurrock Council the adopted waste planning policy CSTP30 has only made provision for London imports of LACW and C&amp;I waste equivalent to a cumulative tonnage across the plan period and in line with apportionment set out the former RSS and with no provision beyond the Core Strategy period (2026). It is also noted that the adopted Further Alterations to the London Plan (FALP) provides for no apportionment of London LACW or C&amp;I waste for export after 2026. No provision for London waste is therefore made for after 2026.</p> <p>C, D and E Waste streams</p> <p>The adopted Thurrock Core Strategy in common with other waste plans in the East of England has not planned for an apportionment of C,D&amp;E waste from London. There is no such apportionment in the former RSS for the East of England or the adopted London Plan and its alterations.</p> <p><b>Do you have any general comments on the waste movements identified by the WRWA WPA's?</b></p> <p>Waste Movements and in particular Construction, Demolition and Excavation (C, D&amp;E) waste</p> <p>The Further Alterations to the London Plan contains no specific apportionment of C,D&amp;E waste to the London Boroughs or to the waste planning authorities outside of London. However the FALP does contain specific overall recycling targets for London for construction and demolition waste of 95% by 2020 and 85% of that waste as aggregate by 2020.</p> <p>It is recognised that high levels of recycling of C and D waste have been achieved across London. However evidence from the London Boroughs and Waste Planning authorities indicates that significant levels of Inert waste including C,D&amp;E waste could continue to be exported from London to</p>

Waste Planning Authority	Type of waste	Response
		<p>landfill facilities outside of London. This is particularly the case with Excavation waste which is identified as becoming a significant proportion of the Inert Waste exported from some London boroughs.</p> <p>There is no agreed apportionment of C,D&amp;E waste from London to landfill (or other facilities) in the Wider South East or therefore, any distribution of such waste from London between the WSE authorities.</p> <p>It is acknowledged that data on C,D&amp;E waste flows is limited. In addition in assessing flows and exports to other areas the use of short term trends identified in the EA Waste Interrogator data are of limited use as they only indicate very recent flows and this waste stream is subject to significant fluctuations in quantity and over time and also in respect to location.</p> <p>It is also noted that the timetable for the preparation of the Local Plan coincides in part with the Full Review of the London Plan and there will be further opportunity to work with the Mayor and London authorities on new evidence base and policy approach including updates on Household, C&amp;I, and C,D&amp;E waste projections together with any GLA waste arising reports.</p> <p>The adopted Thurrock Core Strategy in common with other waste plans in the East of England has not planned for an apportionment of C,D&amp;E waste from London. There is no such apportionment in the former RSS for the East of England or the adopted London Plan and its alterations.</p> <p>For the above reasons Thurrock would wish to continue in discussion via the Duty to Cooperate process regarding any assumptions about the role and capacity of Thurrock landfill sites to receive C,D&amp;E waste in particular from London Boroughs.</p>
West London (Ealing, Hillingdon)	HIC CD&E	<p>Ealing – no response.</p> <p>Hillingdon: In regards to the thresholds used for identifying 'significant' quantities of waste, the minimum thresholds seem slightly smaller than the most recent DtCs we have been asked to respond to. They</p>

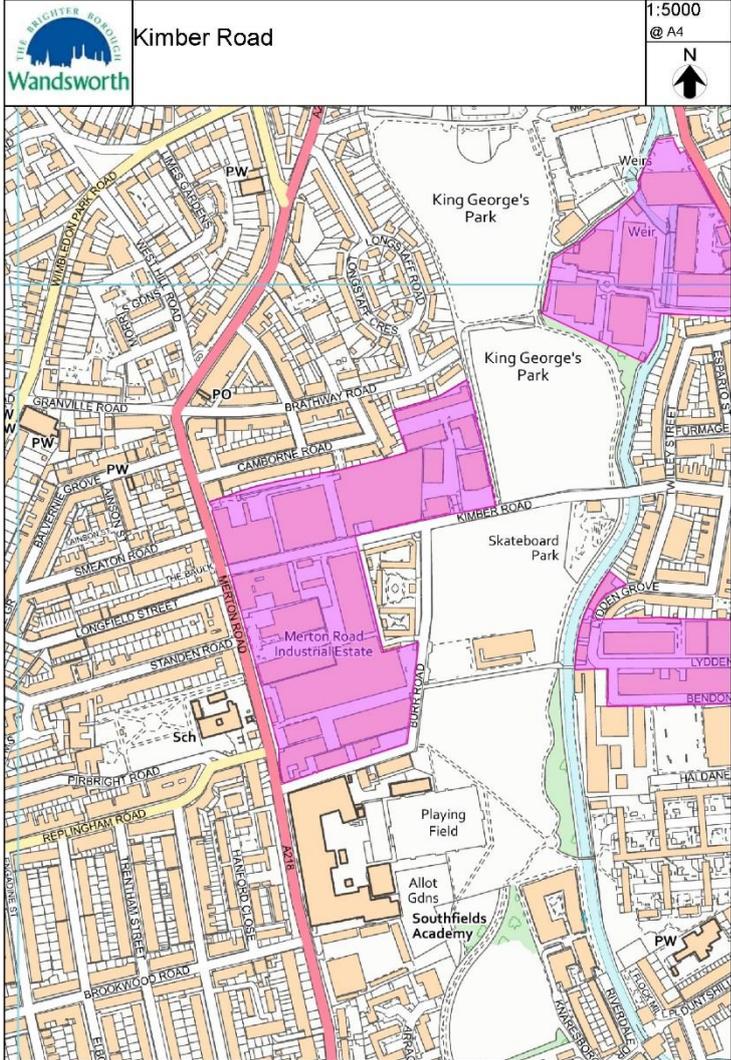
Waste Planning Authority	Type of waste	Response
		<p>tend to use 500 and 10,000 tpa. I note that your technical paper also used a threshold of &gt;500 tpa at some point. Due to the lack of a standardised definition of what is significant however, I am not too concerned about this and would not know which is the most appropriate.</p> <p>In terms of the figures themselves, I note you have highlighted that there are no significant hazardous waste movements. Presumably this was identified by adjusting the WDI waste category to 'Haz'. Running the search on the separate Hazardous Waste Data Interrogator 2015 however highlights some significant movements of hazardous waste. Looking at the latest advice provided on the NLWP, the Environment Agency advise that the HWDI should be used to source data on hazardous waste as it is more accurate than the main Waste Data Interrogator for this waste stream, although won't include the final destinations.</p> <p>In terms of the rest of the figures, they appear to align with the searches I ran as well. I would just highlight that the "Sipson North East Inert Landfill" is a quarry that uses inert landfill waste as part of the restoration. The planning application was originally granted in 2010 and received an extension until August 2017 (45408/APP/2014/1678), indicating that the landfill may be drawing to a close. The reduction in the figures between 2014 to 2015 may be an indication of this as well. I would therefore advise contacting the contractor to see if these movements are likely to continue in the future.</p>

## Appendix D: Review of Industrial Land for Waste Use

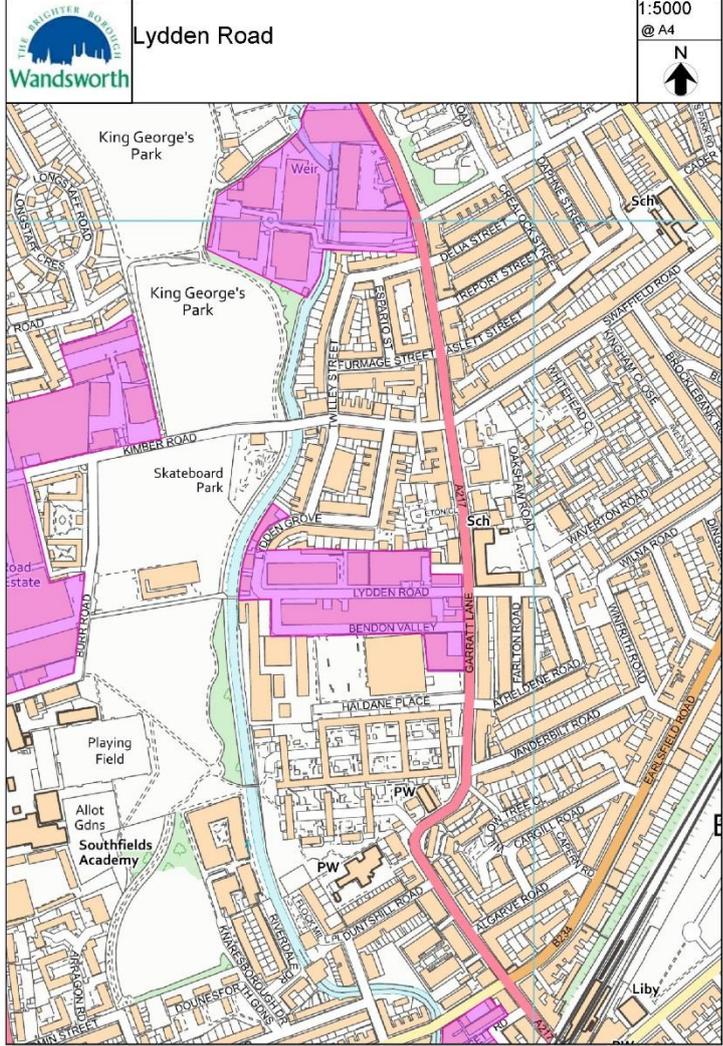
<b>Name</b>	Queenstown Road, Battersea
<b>Map</b>	 <p>The map shows the Queenstown Road area in Battersea, London. A large area of land is highlighted in blue, representing the industrial land for waste use. The map includes labels for 'Queenstown Road', 'Nine Elms', 'Ladies Park', 'Central Park', 'Wandsworth', and 'Havelock Terrace'. A scale of 1:7500 @ A4 is indicated.</p>
<b>Size in hectares</b>	42.9
<b>Nature and scale of the Area</b>	<p>Queenstown Road SIL is in the north-east of the borough. The Area's prime central Location ensures that it has excellent access to the CAZ market to supply its goods and services. It therefore has a range of active employment uses within this area including large scale distribution / logistics, warehousing and manufacturing, and a few small and medium sized office buildings. Smaller warehouse and industrial units are situated in the northeast corner of the cluster on Havelock Terrace, including some premises within railway arches.</p>
<b>Access, congestion and road capacity</b>	<p>The Queenstown Road SIL, comprises of two areas either side of Queenstown Road. The area of the cluster to the east of Queenstown Road is approximately 30.5ha and has good levels of accessibility, adjoining the strategic road network via Battersea Park Road to the north and Wandsworth Road to the south, and with public transport connections via Queenstown Road Station. Parking and servicing is adequate though there are some issues with permeability and traffic flow restrictions. The area to the west of Queenstown Road is approximately 10.8ha and situated between two connecting railway lines. The only access to the strategic road network (the A3216 Queenstown Road) is via two residential streets: Culvert Road and Broughton Street. The subsequent HGV movements on these roads impact nearby residential properties due to dust and noise emissions.</p>
<b>Opportunity to use rail or water to transport waste</b>	<p>There are two railheads in the area, including one used by Day Aggregates. There is an opportunity to discuss use of these railheads for transporting waste.</p>

<b>Name</b>	Queenstown Road, Battersea	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	<p>Queenstown Road SIL currently includes the 'Pensbury Place Waste Management Site' comprising four individual waste sites:</p> <ul style="list-style-type: none"> <li>• Biffa Waste Services (Central London Depot)</li> <li>• European Metal Recycling</li> <li>• Pensbury Place Transfer Station (Cory)</li> <li>• Wandsworth Transfer Station (Suez)</li> </ul>	
<b>Planning policy designation</b>	Air Quality Focus Area	No
	Heritage assets	<p>Archaeological Priority Area Listed Building:</p> <ul style="list-style-type: none"> <li>• Queenstown Road Station</li> </ul> <p>Locally Listed Buildings:</p> <ul style="list-style-type: none"> <li>• Ingate Place, Former Hamptons Depository</li> <li>• 220-220a Queenstown Road</li> </ul> <p>Adjacent to Parktown Estate Conservation Area</p>
	Tree Protection Orders	No
	Flood Affected	Flood Zone 3 Area benefiting from flood defences
	Land instability	No known issues
	Protected Vistas	Local View 5: From Queenstown Road to Battersea Power Station
	Site allocations	Pensbury Place Waste Management Site National Express Bus Depot Silverthorne Road (Network rail site)
	Opportunity area	Nine Elms Vauxhall Opportunity Area
	Central Activities Zone	Adjacent to CAZ
	Thames Policy Area	No
	SINC	No
	Metropolitan Open Land	No
	Other landscape/visual impacts	None
	Wandsworth Employment Land and Premises Study	Cluster C1
B1a – C3 Article 4 Area	Yes	
<b>Potential opportunities, constraints and mitigation</b>	<p>The Council has intentions to redevelop part of the northern part of Queenstown Road SIL as part of plans to create a hub for SMEs in the creative and technology industries known as the Battersea Design and Technology Quarter (BDTQ). The BDTQ will be less suitable for large-scale waste facilities although there may be opportunities for small-scale reuse and repair workshops and for innovative technologies to be explored.</p> <p>The remainder of the SIL is suitable for larger-scale facilities which can be located away from sensitive receptors such as housing.</p>	

<b>Name</b>	Queenstown Road, Battersea
	The SIL's only access to the strategic road network (the A3216 Queenstown Road) is via two residential streets: Culvert Road and Broughton Street. The subsequent HGV movements on these roads impact nearby residential properties due to dust and noise emissions. This will be a consideration for developers of any new waste facilities in the SIL.
<b>Types of suitable facility</b>	<ul style="list-style-type: none"> <li>Repair and Reuse</li> <li>Recycling and Reprocessors</li> <li>Treatment</li> <li>Collection and handling</li> </ul>

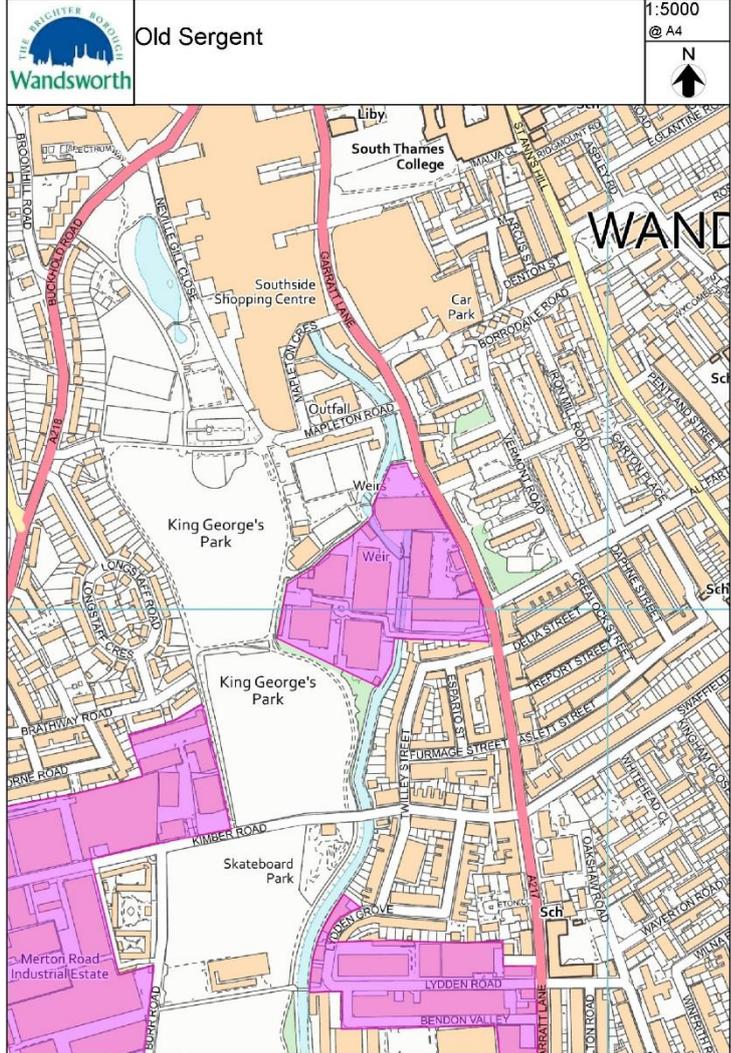
Name	Kimber Road
Map	 <p>The map shows Kimber Road running vertically through the center. To the west are residential streets like Granville Road and Standen Road. To the east are King George's Park and Skateboard Park. Further east is the Merton Road Industrial Estate. Other landmarks include Southfields Academy and a playing field. The map includes a scale of 1:5000 and a north arrow.</p> <p>Reproduced from the Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationery Office ©Crown copyright. Unauthorised reproduction infringes ©Crown copyright and may lead to prosecution or civil proceedings. Wandsworth Borough Council Licence No. LA 100019270 (2020)</p>
Size in hectares	7.2
Nature and scale of the Area	<p>Kimber Road LSIA occupied by predominantly medium sized premises including warehousing, several car dealerships and service centres, trade counter premises and a factory shop on Merton Road. Space for SMEs is primarily within the Glenville Mews estate towards the east of the cluster, which comprises of single storey warehousing units. This area is generally well occupied with limited evidence of vacancy. The west of the cluster is predominantly occupied by self-storage units and retail. Building quality is generally adequate for the uses within the cluster.</p>
Access, congestion and road capacity	<p>The LSIA has good access to the strategic road network via Kimber Road and Garratt Lane.</p>

<b>Name</b>	Kimber Road	
<b>Opportunity to use rail or waster to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There are no waste facilities in Kimber Road LSIA.	
<b>Planning policy designation</b>	Air Quality Focus Area	No
	Heritage assets	Archaeological Priority Area Listed Building: • 265 Merton Road
	Tree Protection Orders	No
	Flood Affected	No
	Land instability	No known issues
	Protected Vistas	No
	Site allocations	No
	Opportunity area	No
	Central Activities Zone	No
	Thames Policy Area	No
	SINC	King George's Park adjacent
	Metropolitan Open Land	King George's Park adjacent
	Other landscape/visual impacts	Coronation Gardens adjacent
	Wandsworth Employment Land and Premises Study	Cluster C4
B1a – C3 Article 4 Area	Yes	
<b>Potential opportunities, constraints and mitigation</b>	<p>The ELPS identifies Kimber Road LSIA as having potential to be intensified to provide additional industrial floorspace. Within the LSIA there are older buildings in poor quality which are vacant or underused.</p> <p>The LSIA has good access to the strategic road network and is suitable for new waste facilities.</p> <p>The main constraint is the proximity of residential housing and the school to the LSIA. Considerations will include the extent to which adverse emissions, odours, noise and vibration can be controlled through the use of appropriate and well-maintained and managed equipment and vehicles. Mitigation measures include ensuring facilities are enclosed to reduce noise, dust odour, litter and vermin.</p>	
<b>Types of suitable facility</b>	Recycling and Reprocessors Treatment Collection and handling	

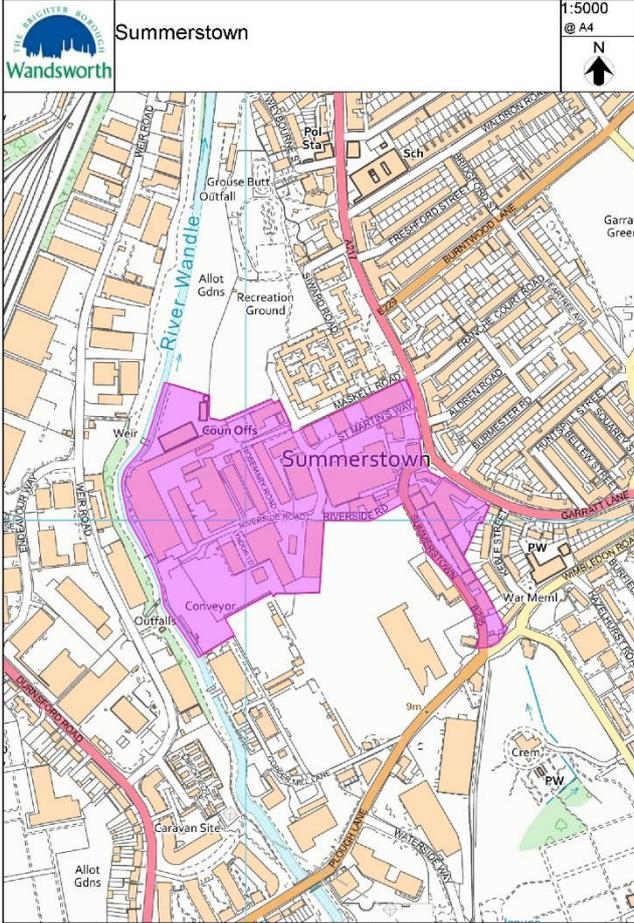
Name	Lydden Road
Map	 <p>Reproduced from the Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationery Office ©Crown copyright. Unauthorised reproduction infringes ©Crown copyright and may lead to prosecution or civil proceedings. Wandsworth Borough Council Licence No. LA 100019270 (2020)</p>
Size in hectares	2.7
Nature and scale of the Area	<p>LSIA comprising warehousing and office space along Lydden Road and Lydden Grove. The east of the cluster comprises of medium and large size warehousing and office units. Building quality is generally good although there is limited parking space. These buildings are occupied by a mix of tenants, including record and rehearsal studios, photographers and trade consultants. However, there is vacancy and advertised space within these buildings. Warehousing space within the CREW Clothing Site is currently vacant and office space within the Earlsfield Business Centre is currently being advertised. The west of the cluster comprises of small to medium sized single storey warehousing units. Parking is adequate here though the building quality and quality of the surrounding environment is generally poor. There is no vacancy being advertised in this part of the cluster.</p>

<b>Name</b>	Lydden Road	
<b>Access, congestion and road capacity</b>	The cluster has good access to the strategic road network via Garratt Lane. This area of the cluster is located close to residential properties on Lydden Grove. However, there is no evidence that the uses onsite currently impact on residents of these properties.	
<b>Opportunity to use rail or water to transport waste</b>	The River Wandle runs to the west of the LSIA, but there is not currently infrastructure to support transportation of waste to this site by water.	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There is one small vacant waste site in Lydden Road LSIA (D Goldsmith).	
<b>Planning policy designation</b>	Air Quality Focus Area	No
	Heritage assets	Archaeological Priority Area Locally Listed Building: • The Jolly Gardeners
	Tree Protection Orders	209/1996
	Flood Affected	Flood Zone 2
	Land instability	No known issues
	Protected Vistas	No
	Site allocations	No
	Opportunity area	Economic Use Intensification Area (EUIA) adjacent
	Central Activities Zone	No
	Thames Policy Area	No
	SINC	King George's Park adjacent
	Metropolitan Open Land	King George's Park adjacent
	Other landscape/visual impacts	River Wandle
	Wandsworth Employment Land and Premises Study	Cluster C5
B1a – C3 Article 4 Area	Yes	
<b>Potential opportunities, constraints and mitigation</b>	<p>The ELPS identifies Lydden Road LSIA as having potential to be intensified to provide additional industrial floorspace. Within the LSIA there are older buildings in poor quality which are vacant or underused.</p> <p>There may be an opportunity for smaller-scale waste facilities in the LSIA.</p> <p>The main constraint is the proximity of residential housing and the school to the LSIA. Mitigation measures include ensuring facilities are enclosed to reduce noise, dust odour, litter and vermin.</p> <p>The type of waste managed on site is important, and ensuring no putrescible waste would mitigate odours, vermin and birds. Therefore a treatment facility such as MBT or AD are unlikely to be suitable in the area.</p>	

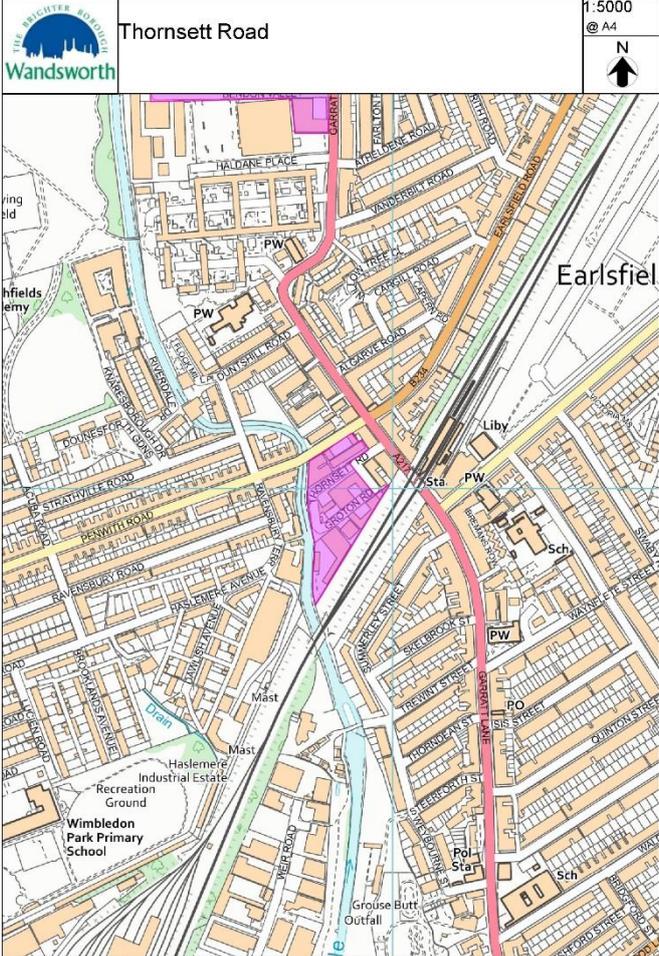
<b>Name</b>	Lydden Road
	<p>The scale and operation of the facility will be important. Ensuring a small-scale facility will help mitigate noise. Ensuring day-time operational hours will help mitigate noise and light pollution. Therefore large-scale recycling, reprocessing or treatment facilities are unlikely to be suitable for this site.</p> <p>Noise and vibration from goods vehicle traffic movements to and from a site is a key consideration, particularly as vehicles would rely on local roads for access. The scale and operating hours of the facility will affect the number and times of vehicle movements and this will need to be a condition of any new proposal.</p>
<b>Types of suitable facility</b>	<p>Repair and Reuse facilities  Small-scale recycling and reprocessing  Small-scale Collection and handling</p>

Name	Old Sergeant
Map	 <p>Reproduced from the Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationery Office © Crown copyright. Unauthorised reproduction infringes © Crown copyright and may lead to prosecution or civil proceedings. Wandsworth Borough Council Licence No. LA 100019270 (2020).</p>
Size in hectares	3.5
Nature and scale of the Area	Old Sergeant LSIA is occupied by predominantly medium sized industrial/warehousing premises, a trade counter and retail area, and two large self-storage facilities within an industrial estate. Building quality is generally good, and the condition of the public realm and surrounding environment is deemed adequate for its current use.
Access, congestion and road capacity	The LSIA has good access to the strategic road network via Garratt Lane. Accessibility within the cluster is good and there is adequate parking space for the uses on site. The cluster appears to function well as an LSIA.
Opportunity to use rail or waster to transport waste	The River Wandle runs through the industrial estate, but there is not currently infrastructure to support transportation of waste to this site by water.

<b>Name</b>	Old Sergeant	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There are no waste facilities in Old Sergeant LSIA.	
<b>Planning policy designation</b>	Air Quality Focus Area	No
	Heritage assets	Archaeological Priority Area Locally Listed Building: • The Old Sergeant PH
	Tree Protection Orders	No
	Flood Affected	Flood Zone 2 with Flood Zone 3a near River Wandle
	Land instability	No known issues
	Protected Vistas	No
	Site allocations	No
	Opportunity area	No
	Central Activities Zone	No
	Thames Policy Area	No
	SINC	King George's Park adjacent River Wandle adjacent
	Metropolitan Open Land	King George's Park adjacent
	Other landscape/visual impacts	River Wandle
	Wandsworth Employment Land and Premises Study	Cluster C3
B1a – C3 Article 4 Area	No	
<b>Potential opportunities, constraints and mitigation</b>	<p>The ELPS identifies Old Sergeant LSIA as having potential to be intensified to provide additional industrial floorspace. Within the LSIA there are older buildings in poor quality which are vacant or underused.</p> <p>The LSIA has good access to the strategic road network and is suitable for new waste facilities.</p> <p>The main constraint is the proximity of residential housing to the LSIA. Considerations will include the extent to which adverse emissions, odours, noise and vibration can be controlled through the use of appropriate and well-maintained and managed equipment and vehicles. Mitigation measures include ensuring facilities are enclosed to reduce noise, dust odour, litter and vermin.</p>	
<b>Types of suitable facility</b>	<p>Recycling and Reprocessors Treatment Collection and handling</p>	

Name	Summerstown
Map	 <p>Reproduced from the Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationery Office © Crown copyright. Unauthorised reproduction infringes © Crown copyright and may lead to prosecution or civil proceedings. Wandsworth Borough Council Licence No. LA 100019270 (2020)</p>
Size in hectares	10.1
Nature and scale of the Area	<p>Summerstown LSIA, is situated to the north of Wimbledon Stadium and comprises several business estates with medium and large warehouses, industrial, a trade counter, and some retail accommodation, and several artists' studios. Building quality within the cluster is mixed, with adequate parking and servicing, and a poor surrounding environment.</p>
Access, congestion and road capacity	<p>The cluster has excellent access to the strategic road network via Garratt Lane and is located close to Earlsfield rail station which provides access to the public transport network. While there are places of worship at the fringes of the cluster on Summerstown within industrial premises, there do not appear to be obvious 'bad neighbour' issues, and there is the potential for intensification of uses within some areas of older warehousing and possibly 24-hour working in the Wimbledon Stadium Business Centre. Overall, Cluster C2 appears to function well as an LSIA, is efficiently used, and is a key business and industrial area which supports and appears to be a hub for SMEs, creative industries and artists' studios.</p>

<b>Name</b>	Summerstown	
<b>Opportunity to use rail or waster to transport waste</b>	The River Wandle runs to the west of the LSIA, but there is not currently infrastructure to support transportation of waste to this site by water.	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There is one existing waste facility in Summerstown LSIA (Willows MRF).	
<b>Planning policy designation</b>	Air Quality Focus Area	No
	Heritage assets	Archaeological Priority Area Locally Listed Building: • 6 and 8 Summerstown
	Tree Protection Orders	No
	Flood Affected	Flood Zone 3a, Flood Zone 2
	Land instability	No known issues
	Protected Vistas	No
	Site allocations	No
	Opportunity area	No
	Central Activities Zone	No
	Thames Policy Area	No
	SINC	Lambeth Cemetery adjacent River Wandle adjacent
	Metropolitan Open Land	Lambeth Cemetery adjacent
	Other landscape/visual impacts	Garratt Park adjacent River Wandle adjacent
	Wandsworth Employment Land and Premises Study	Cluster C2
B1a – C3 Article 4 Area	Yes	
<b>Potential opportunities, constraints and mitigation</b>	<p>The draft New London Plan has proposed that the Summerstown LSIA become a Strategic Industrial Location. The ELPS recommends that this proposition is taken forward. The site does not appear to have any ‘bad neighbour’ issues and there is possibility for 24-hour operations.</p> <p>The LSIA has good access to the strategic road network and is suitable for new waste facilities.</p>	
<b>Types of suitable facility</b>	<p>Recycling and Reprocessors Treatment Collection and handling</p>	

Name	Thornsett Road
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Size in hectares	1.1
Nature and scale of the Area	<p>LSIA located to the west of Earlsfield Station. The cluster comprises small, predominantly industrial premises for SMEs, including one new, medium sized light-industrial and warehouse building, with ancillary offices. There is one large office building within the cluster. Building quality is generally good though there are some buildings of poorer quality towards the north of the cluster. The employment space is well occupied, primarily by SMEs, and there is no evidence of vacancy.</p>
Access, congestion and road capacity	<p>Access to the strategic road network and public transport network with a PTAL score of 5, with both Garratt Lane and Earlsfield station located nearby. Parking is perhaps not enough to serve the number of businesses, and likely exacerbated by the number of vehicle repair and servicing businesses in this location.</p>

<b>Name</b>	Thornsett Road	
<b>Opportunity to use rail or water to transport waste</b>	The River Wandle runs to the west of the LSIA, but there is not currently infrastructure to support transportation of waste to this site by water.	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There are no waste sites in Thornsett Road LSIA.	
<b>Planning policy designation</b>	Air Quality Focus Area	No
	Heritage assets	Archaeological Priority Area Locally Listed Building: • The Country House PH
	Tree Protection Orders	No
	Flood Affected	Flood Zone 3a, Flood Zone 2
	Land instability	No known issues
	Protected Vistas	No
	Site allocations	No
	Opportunity area	No
	Central Activities Zone	No
	Thames Policy Area	No
	SINC	River Wandle adjacent
	Metropolitan Open Land	No
	Other landscape/visual impacts	River Wandle
	Wandsworth Employment Land and Premises Study	Cluster C6
B1a – C3 Article 4 Area	No	
<b>Potential opportunities, constraints and mitigation</b>	<p>The ELPS identifies Thornsett Road LSIA as having potential to be intensified to provide additional industrial floorspace. Within the LSIA there are older buildings in poor quality which are vacant or underused.</p> <p>The LSIA has good access to the strategic road network and is suitable for new waste facilities.</p> <p>The main constraint is the proximity of residential housing to the LSIA. Mitigation measures include ensuring facilities are enclosed to reduce noise, dust odour, litter and vermin.</p> <p>The type of waste managed on site is important, and ensuring no putrescible waste would mitigate odours, vermin and birds. Therefore a treatment facility such as MBT or AD are unlikely to be suitable in the area.</p> <p>The scale and operation of the facility will be important. Ensuring day-time operational hours will help mitigate noise.</p>	

<b>Name</b>	Thornsett Road
	Noise and vibration from goods vehicle traffic movements to and from a site is a key consideration, particularly as vehicles would rely on local roads for access. The scale and operating hours of the facility will affect the number and times of vehicle movements and this will need to be a condition of any new proposal.
<b>Types of suitable facility</b>	Repair and Reuse facilities Recycling and reprocessing Collection and handling