

London Borough of Southwark

# Southeast London joint waste planning technical paper

Submission Draft

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# 1. Joint waste technical paper summary

## Introduction and background

- 1.1. This technical paper has been prepared by the southeast London boroughs joint waste planning group (hereon referred to in this technical paper as the 'Waste Planning Group') in order to demonstrate how Borough-level apportionments of waste, set out in the current London Plan (2016)<sup>1</sup> and the draft new London Plan<sup>2</sup>, will be met.
- 1.2. Information provided in this technical paper is up-to-date as of December 2019, with capacity figures provided by fiscal year (up through 31 March 2019).
- 1.3. The Waste Planning Group was originally formed by five London unitary waste planning authorities working together to identify and meet sub-regional requirements for waste management facilities. The initial group consisted of the London boroughs of Bexley, Bromley, Lewisham, Greenwich and Southwark. The City of London subsequently joined the group, with Bexley taking responsibility for their apportionment.
- 1.4. The Waste Planning Group is committed to addressing the requirements of London Plan policies 5.16 and 5.17 in line with national policy for waste management (set out in the National Planning Policy for Waste, October 2014) and National Planning Policy Guidance set out online. Each local planning authority within the Waste Planning Group is responsible for including local waste management policies, and necessary site allocations, in their Local Plan (or equivalent development plan document).
- 1.5. This technical paper presents a snapshot of the sites and capacities at the time of writing but is regularly updated to ensure any changes are taken into account when boroughs review their policies and allocations. This latest revision of the technical paper supports in particular Southwark's New Southwark Plan, due to be submitted to the Secretary of State for public examination in December 2019.
- 1.6. Southwark is producing a single-document local plan under the 2012 Town and Country Planning Regulations. It is a development plan document (DPD) that will include strategic and detailed policies, site allocations (including strategic waste management sites) and designations. When adopted, the New Southwark Plan (NSP) will sit alongside several adopted Area Action Plans (AAP) and the emerging Old Kent Road AAP, currently at the preferred option stage.

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<sup>1</sup> <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan>

<sup>2</sup> <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-london-plan-consolidated-suggested-changes-version-july-2019>

- 1.7. Through the Waste Planning Group's individual DPDs, sufficient sites have been identified, which, when pooled, collectively meet the London Plan waste capacity apportionment requirements for the sub-region. In addition to this, surplus capacity exists to allow the sub-region to respond to any uplift in give additional security in the future.

## **The European Union Directive**

- 1.8. The EU Waste Framework Directive (2018/851)<sup>3</sup> provides the legislative framework for the collection, transport, recovery and disposal of waste, and includes a common definition of waste. The Directive requires all member states to take the necessary measures to ensure waste is recovered or disposed of without endangering human health or causing harm to the environment and includes permitting, registration and inspection requirements. Waste management is to be improved and transformed into sustainable material management, to improve the quality of the environment, protect human health, and promote principles of the circular economy. This is further identified in EU Directive 2018/851 amending Directive 2008/98/EC.
- 1.9. The EU Circular Economy Action Plan (2015) describes the central role of waste management in enabling the circular economy through the EU waste hierarchy. This encourages higher rates of valuable materials finding their way back into the economy through higher levels of material recovery. Increased recycling targets and improved management of municipal waste are established in this Action Plan. Improved methods of waste collection and sorting are also prioritised. This includes sufficient investment in separating collection and recycling infrastructure.
- 1.10. Waste planning authorities play a role in implementing several Articles of the Directive including the waste hierarchy and the principles of proximity and self-sufficiency. Article 28 of the Directive requires that Member States ensure that their competent authorities establish one or more waste management plans covering all of their territory.

## **National waste policy and guidance**

### The Resources and Waste Strategy

- 1.11. A resources and waste strategy for England was published in December 2018<sup>4</sup>. The strategy is the first comprehensive update of the Waste Management Plan (WMP) for England 2013 and sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

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<sup>3</sup> <https://ec.europa.eu/environment/waste/framework/>

<sup>4</sup> <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>

- 1.12. The strategy, combined with equivalent plans prepared by the devolved administrations together with local authorities' local waste management plans, fulfils the requirements in Article 28 of the Waste Framework Directive.
- 1.13. The strategy provides an analysis of the waste management situation in England (at time of publication) and evaluates how it will support implementation of the objectives and provision of the Waste Framework Directive.
- 1.14. All local planning authorities should have regard to the Strategy and the national planning policy for waste when discharging their responsibilities for waste management.

#### National Planning Policy for Waste

- 1.15. The National Planning Policy for Waste (NPPW)<sup>5</sup> was published in October 2014, superseding PPS10. It should be read in conjunction with the Resources and Waste Strategy, the National Planning Policy Framework (NPPF)<sup>6</sup> and national policies on wastewater and hazardous waste. The NPPW sets out policies on:
  - the use of best available data and robust analysis to underpin a proportionate evidence base;
  - the requirement to establish the need for waste management facilities;
  - the requirement to identify suitable sites and areas to meet the need in local plans;
  - the determination of waste planning applications; and
  - monitoring and reporting.
- 1.16. Of particular relevance to the Waste Planning Group's approach is that the NPPW states that waste planning authorities should:
  - (in London) have regard to their apportionments set out in the London Plan when preparing their plans;
  - take into account any need for waste management arising in more than one waste planning authority area but where only a limited network of facilities would be required; and,
  - work collaboratively in groups with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management.

#### National Planning Policy Guidance

- 1.17. Guidance on waste planning was first published as part of the Government's National Planning Policy Guidance (NPPG)<sup>7</sup> in October 2014 alongside the

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<sup>5</sup> <https://www.gov.uk/government/publications/national-planning-policy-for-waste>

<sup>6</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>7</sup> <https://www.gov.uk/guidance/waste>

NPPW. It serves to add clarity to the policy framework set out in the NPPW and includes practical advice on implementation.

- 1.18. The guidance expands on the principles of self-sufficiency and proximity set out in the WFD, acknowledging that although the aim should be for a waste planning authority to manage all of its own waste, there is no expectation that each local planning authority should deal solely with its own waste. It also recognises that there could be significant economies of scale for local authorities working together to assist with the development of a network of waste management facilities to enable waste to be handled effectively.
- 1.19. The guidance states that waste is a strategic issue and therefore may be a matter for consideration under the 'Duty to Cooperate,' placing a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plans on strategic cross boundary matters.
- 1.20. The collaborative nature of the Waste Planning Group's work, its communication with other waste planning authorities and individual Local Plan preparation is considered to address the relevant aspects of compliance with the duty. This is demonstrated both in this technical paper and individually through borough's 'duty to cooperate' and consultation statements that support local plans at examination.
- 1.21. A specific section on planning for London's waste refers to the need to have regard to the apportionments set out in the London Plan and the likely need for waste planning authorities *outside* London to take some of London's waste.
- 1.22. The Government published A Green Future: 25 Year Environmental Plan (2018) which sets out the Government's actions to help the natural world regain and retain good health. It aims to deliver cleaner air and water, protect threatened species and habitats and enable an approach that puts the environment first in agriculture, forestry, land use and fishing. There is no specific section related to London.

## **The London Plan**

- 1.23. The Mayor, through the London Plan, consolidated with alterations since 2011 (March 2016) (hereon in referred to as the London Plan 2016) sets out a framework for waste management in the Capital which starts from the position that the best approach is to reduce the amount of waste that arises in the first place. Where this is not possible, he supports an approach based on the waste hierarchy, the last and least desirable option being disposal.
- 1.24. Policy 5.16 addresses London's aspiration for waste net self-sufficiency by setting the expectation that the Mayor and the London boroughs will manage as much waste within London as practicable, working towards the equivalent of managing 100% of London's waste within London by 2026. This will be

achieved by minimising waste, encouraging reuse of and reduction in use of materials, increasing recycling rates, reducing the amount of waste exported and by working with neighbouring districts to coordinate strategic waste management across the wider southeast region.

- 1.25. Policy 5.17 considers waste capacity and sets the policy framework for London boroughs to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the Plan. London boroughs can collaborate by pooling their apportionment requirements, and, if they choose to do so, must demonstrate that their joint apportionment targets will be met, for example, through the preparation of joint waste DPDs, joint evidence papers or bilateral agreements.

## **Draft New London Plan**

- 1.26. In December 2017 the Mayor of London launched consultation on a draft new London Plan. The draft Plan was submitted to the Secretary of State and an examination in public (EiP) was held from January to May 2019. The Report from the Panel of Inspectors was received by the Mayor on 7 October 2019, and a statement by the Mayor in response to the Panel Report, along with his Intent to Publish version of the new London Plan, should be published before the end of the year.
- 1.27. The draft Plan includes a new policy 'S18 Waste capacity and net waste self-sufficiency.' The policy includes revised apportionment targets for each borough. The new London Plan policy sets apportionment targets across 2021 and 2041. The current London Plan 2016 policy sets targets across 2016, 2021, 2026, 2031 and 2036. Therefore, comparison between the two sets of apportionment targets is not directly comparable, save for those prescribed for 2021.
- 1.28. Preliminary testing against capacity already modelled for 2036 prepared for this paper has been compared against the 2041 apportionment requirements to provide an indication of the likely impact of the new apportionment targets if they remain the same in the final published Plan. Owing to the fact that these targets are not yet adopted, they have not formed the basis of the study but have been included for completeness. See **Appendix C** for details.

## **Summary of findings and conclusions**

- 1.29. In accordance with London Plan Policy 5.17, the Waste Planning Group presents evidence in this technical paper to demonstrate that land has been allocated for strategic waste management facilities within each member's respective DPDs that will, when the capacity is pooled, meet the combined waste apportionment identified for the London boroughs within the Waste Planning Group sub-region.
- 1.30. The spread sheet setting out individual sites capacities is shown in **Appendix A**. Totals are set out for each borough and compared to the combined waste

apportionment figures for the five southeast London boroughs and the City set out in Table 5.3 of The London Plan 2016 and Table 9.2 of The Draft New London Plan July 2019.

- 1.31. Capacity figures are up-to-date as of the end of the fiscal year 31 March 2019. Table 1 sets out a summary of the Waste Planning Group's position when measured against the apportionment targets set out in the current London Plan (Table 5.3) and in the Draft London Plan (Table 9.2).
- 1.32. The figures demonstrate that the Waste Planning Group can expect a surplus over the apportionment targets set in both the current London Plan, and the Draft New London Plan should they remain as they are currently in the draft, when the New London Plan is published.
- 1.33. Comparison between the current London Plan and the new draft London Plan apportionment targets have been set out in **Appendix C** for completeness.

Local planning authority	2021	2026	2031	2036	2041
Southwark	106,950	109,050	111,150	111,150	111,150
Bexley	1,224,297	1,224,297	1,224,297	1,224,297	1,224,297
Bromley	95,240	102,264	109,288	109,288	109,288
City of London	0	0	0	0	0
Lewisham	502,623	502,888	503,152	503,152	503,152
Royal Greenwich	99,072	102,482	105,893	105,893	105,893
<b>total capacity (tonnes)</b>	<b>2,028,182</b>	<b>2,040,981</b>	<b>2,053,780</b>	<b>2,053,780</b>	<b>2,053,780</b>
<b>projected total surplus</b>	<b>735,182</b>	<b>510,981</b>	<b>500,780</b>	<b>471,780</b>	<b>471,780</b>
<b>projected actual surplus capacity</b>	<b>529,582</b>	<b>305,381</b>	<b>295,180</b>	<b>266,180</b>	<b>266,180</b>

**Table 1: Actual capacity (tonnes per annum) from safeguarded strategic operational waste management facilities**

- 1.34. The pooled figures set out above exceed the amount needed for the London Plan 2016 pooled waste apportionment requirement for the southeast London boroughs (including the City of London). For all safeguarded sites, including non-operational potential waste sites, the total projected surplus capacity is 471,780 tonnes per annum by 2036.
- 1.35. However, when considering only operational waste management facilities, a more accurate representation of actual surplus capacity can be provided, which is 266,179 tonnes per annum by 2036. This capacity recognises the reality of how the southeast London sub-region manages both its own waste arisings and that of other areas both within and outside of London and provides a robust buffer against future changes to the sub-region's apportionment capacity requirements.
- 1.36. A specification sheet for each identified strategic waste site is set out in **Appendix B** (a separate document). This review includes a map and details



such as the size of the site, the types of waste and the type of facility, the licensed and/or actual annual throughput of waste, as well as any future plans for the site.

- 1.37. **Appendix A** gives detailed calculations on how the waste apportionment requirements are met and shows some different capacities over the course of the monitoring years (2016, 2021, 2026, 2031, 2036), reflecting the uplift from Council owned civic amenity sites in recycling rates over each five year phase (as per the requirements of London Plan Policy 5.16).
- 1.38. The waste capacities for each site are determined using a methodology agreed between the boroughs and the GLA, and includes:
  - the identification, if possible, of actual waste throughputs for each operating facility, in order to determine a capacity that contributes to meeting the waste apportionment requirements;
  - the use of a percentage of the facility's licensed capacity in determining the facility's contribution to meeting the waste apportionment requirements; and,
  - for the council-owned household waste recycling centres and waste transfer sites, the use of actual annual recycling amounts averaged over three years, with an uplift in recycling rates over each five-year phase to 60% by 2031.
- 1.39. Each revision of a borough's Local Plan (or equivalent DPD containing waste allocations) may result in additional strategic waste management sites being identified, and there are a number of "non-strategic" sites in each borough that are currently operating as licenced waste facilities. These sites have not been identified in this joint waste technical paper as they are not considered *strategic* and are not required to meet the waste capacity apportionment targets during the London Plan period.
- 1.40. The southeast London boroughs are committed to the requirements of London Plan Policies 5.16 and 5.17, in line with the National Planning Policy for Waste, and undertake to continue to work together to identify sub-regional requirements for waste management facilities and to safeguard sites for those facilities in their DPDs.

## 2. National policy context

### Waste Management Plan for England

2.1 The Government states that the key aim of the Waste Management Plan for England (WMP) is:

*“to set out our work towards a zero waste economy as part of the transition to a sustainable economy”. In particular, this means using the “waste hierarchy” (waste prevention, re-use, recycling, recovery and finally disposal as a last option) as a guide to sustainable waste management.”*

2.2 Published in 2013, the WMP supersedes the Waste Strategy 2007. It is the result of the Waste Review 2011, which evaluated waste management policies for England and their delivery to ensure they were fit for purpose. Combined with the equivalent plans being produced for the devolved administrations and local authorities' local waste management plans, the WMP fulfils the requirements of Article 28 of the revised EU Waste Framework Directive.

2.3 The WMP does not introduce new waste management policies but rather brings together current policies under the umbrella of one national plan. It therefore refers to the following documents:

- Anaerobic Digestion Strategy and Action Plan 2011;
- The UK Plan for Shipments of Wastes;
- The Government's Strategy for improved hazardous waste treatment in England;
- The National Policy Statements for hazardous waste and renewable energy infrastructure;
- The Quality Action Plan for recyclates; and,
- Waste planning policy (National Planning Policy for Waste has replaced PPS10).

2.4 The plan recognises that Government cannot deliver the objectives of the Directive without action from businesses, consumers, householders and local authorities. Waste planning authorities (county and unitary authorities in England) are responsible for producing local waste management plans that cover the land use aspect of waste management for their areas. Waste planning authorities should have regard to the WMP alongside national planning policy for waste and the NPPF.

#### Trends in waste arisings in England

2.5 The WMP outlines the trends and developments in waste management, including the rapid increase in recycling of household waste, and a reduction in arisings from the industrial and commercial sectors. The reasons, it states, are

a combination of regulatory, policy and financial measures such as recycling targets, landfill tax and financial support. The trends are set out as follows<sup>8</sup>:

- household waste production has slightly increased since 2012/13 when 21.6 million tonnes of household waste was produced, of which 43.9% was recycled, re-used or composted, while in 2015/16 the quantity of waste produced was 22.5 million tonnes of which 43.9% was recycled, re-used or composted;
- the established EU Waste Framework Directive minimum target is for 55% of municipal waste to be recycled by 2025, 60% by 2030 and 65% by 2035;
- construction and demolition waste is the largest contributor to total waste generation with 55 million tonnes being generated in 2014;
- the EU target of 70% recovery by weight by 2020 was met during this period with 89.9% of the material being recovered;
- commercial and industrial waste has declined since 2010 when an estimated 33.9 million tonnes was produced as compared to 27.7 million tonnes in 2014 (C&I waste defined using NACE); and,
- hazardous waste arisings have decreased marginally between 2012 and 2014 with 4.7 million tonnes and 4.3 million tonnes being processed respectively across all sectors (materials being processed include chemicals, oils, construction and demolition, wastewater treatment and from general industry).

- 2.6 The UK imported 1.4 million tonnes of waste in 2014 and exported approximately 14.8 million tonnes of materials during this period. Metals are a large component, followed by paper and cardboard, plastic and glass. The EU controls prohibit any waste exports from the EU for disposal such as landfill or incineration and no hazardous waste may be exported.
- 2.7 The UK Plan for Shipments of Waste implements our obligations under the Waste Framework Directive for Member States to move towards a position of self-sufficiency in waste disposal. However, the UK exports a substantial tonnage of waste in the form of Refuse Derived Fuel.
- 2.8 Waste collection schemes and major disposal and recovery for municipal waste are a matter for local authorities to develop fit for purpose local solutions. The Government supports local authorities in improving the quality and quantity of recycling. In 2012, the Waste (England and Wales) Regulations require the separate collection of waste paper, metal, plastic and glass from 2015 onwards wherever separate collection is necessary to improve quality and practicable. Local Councils are not required to offer a separate collection for bio-waste, although anaerobic digestion, identified by the Government as the best technology currently available for treating food waste, is incentivised through renewable energy subsidies.

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<sup>8</sup> Source: <https://www.gov.uk/government/statistical-data-sets/env23-uk-waste-data-and-management>

- 2.9 The WMP explains that the Waste Framework Directive sets out the principles of “proximity.” This requires Member States to establish an integrated and adequate network of waste disposal installations for recovery of mixed municipal waste collected from private households. The network must enable waste to be disposed of or be recovered in one of the nearest appropriate installations, by means of the most appropriate methods and technologies to ensure a high level of protection for the environment and public health – and it should enable Member States to move towards self-sufficiency. The proximity principle must be applied when decisions are taken on the location of appropriate waste facilities.
- 2.10 The WMP refers to the Government consulting on a replacement to PPS10 (National Planning Policy for Waste, published in 2014), which maintains the same principles but “recognises the importance of close collaboration between waste planning authorities, emphasising the requirements of the duty to cooperate... increasingly local authorities are working together in partnerships to deliver full and efficient waste services.”

## **National Planning Policy for Waste**

- 2.11 The National Planning Policy for Waste (NPPW) sets out the role of planning in delivering the Government’s ambitions for waste management through:
- delivery of sustainable development and resource efficiency;
  - ensuring that waste management is considered alongside other spatial planning concerns such as housing and transport;
  - providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste;
  - helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment; and,
  - ensuring the design and layout of new residential and commercial development and other infrastructure complements sustainable waste management.
- 2.12 When preparing Local Plans, waste planning authorities should, to the extent appropriate to their responsibilities:
- ensure that the planned provision of new capacity and its spatial distribution is based on robust analysis of best available data and information, and an appraisal of options;
  - work jointly and collaboratively with other planning authorities to collect and share data and information on waste arisings, and take account of waste arisings across neighbouring waste planning authority areas; and,
  - ensure that the need for waste management facilities is considered alongside other spatial planning concerns.

- 2.13 Waste planning authorities should prepare Local Plans that identify sufficient opportunities to meet the identified needs of their area for the management of waste. In preparing Local Plans, waste planning authorities should:
- engage with local communities to establish an agreed vision and priorities;
  - drive waste management up the waste hierarchy;
  - identify tonnages and percentages of municipal and commercial and industrial waste requiring management over the period of the plan (in London, having regard to London Plan apportionment requirements);
  - consider the need for additional capacity or more than local significance;
  - take into account need from more than one waste planning authority;
  - work collaboratively in groups with other waste planning authorities through the duty to cooperate to provide a suitable network of facilities; and,
  - consider the extent to which the capacity of existing facilities satisfies need.
- 2.14 Waste planning authorities should identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities. They should:
- identify the broad type of facility that would be appropriate;
  - plan for the disposal of waste and recovery of mixed municipal waste in line with the proximity principle;
  - consider opportunities for on-site waste management;
  - consider a broad range of locations including industrial sites; and,
  - give priority to previously developed land and sites identified for employment uses.
- 2.15 The suitability of sites for waste management should be assessed against the following criteria:
- the extent to which the site or area will support the other policies set out in the National Planning Policy for Waste;
  - the physical and environmental constraints on development;
  - the capacity of existing and potential transport infrastructure; and,
  - the cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community, including impacts on environmental quality, social cohesion and inclusion or economic potential.
- 2.16 Waste planning authorities should, including by working collaboratively, first look to suitable sites and areas outside the Green Belt for waste management facilities that would constitute inappropriate development.

## **National Planning Policy Guidance**

- 2.17 First published online in October 2014, Planning Policy Guidance on Waste complements the National Planning Policy for Waste. It sets out the role that local planning authorities have in meeting the requirements of the Waste Framework Directive through application of the waste hierarchy, protection of

human health and the environment, principles of proximity and self-sufficiency, waste management plans and monitoring.

- 2.18 The guidance reiterates that the self-sufficiency and proximity principles do not mean that each local authority should deal solely with its own waste, nor does it require use of the absolute closest facility to the exclusion of all other considerations. It acknowledges economies of scale for local authorities working together and the need to ensure existing capacity is used effectively and efficiently without resulting in local over-capacity.
- 2.19 The Guidance sets out what Local Plans on waste must include to meet the requirements of the Directive:
- details of existing major disposal and recovery installations;
  - an assessment of the need for the closure of existing waste management facilities and need for additional facilities; and,
  - sufficient information on the location criteria for site identification and on the capacity of future disposal or major recovery installations.
- 2.20 As a strategic issue, waste is one of the matters on which local planning authorities need to demonstrate effective action under the Duty to Cooperate. This may include collective gathering of information and data, preparation of a joint evidence base, consultation with other planning authorities and joint monitoring.
- 2.21 Of particular relevance to the southeast London boroughs is the Guidance's advice on cooperation where waste planning authorities are unable to identify sufficient suitable opportunities for waste management. It states that this may occur where there is a lack of physical capacity or where it would cause harm to the policies and principles in the NPPF, including for the Green Belt. In these circumstances, it suggests that joint working can ensure sufficient opportunities outside the Green Belt for waste management facilities. Effective cooperation, it states, will also be important in ensuring the planned provision of new capacity and its spatial distribution is based on a robust analysis of waste management needs.
- 2.22 In preparing Local Plans, local planning authorities should consider opportunities for land to be utilised for waste management, for example by:
- an assessment of suitable previously-developed land, including industrial land which may be reused for waste management;
  - integration of local waste management opportunities in new development; and,
  - facilitation of the co-location of waste sites with end users of waste outputs such as users of fuel, low carbon energy or heat.
- 2.23 Local plans should not generally prescribe the waste management techniques or technologies that will be used to deal with specific waste streams in the

area, but they should identify the type or types of facility that would be appropriately located on allocated sites or areas.

2.24 Information on the current waste management capacity and forecast of future requirements is needed to inform planning for future waste infrastructure. Guidance suggests that assessing waste management needs is likely to involve:

- an understanding of waste arisings within the area including imports and exports;
- identification of waste management capacity gaps;
- forecasting arisings, and assessing capacity for the forecast over the plan period;
- information on existing waste management capacity;
- assessing capacity of sites;
- assessing closure of existing facilities and need for additional infrastructure;
- forecasting;
- identifying sites and areas; and
- allocating sites in Local Plans.

2.25 The Guidance notes the unique situation in London and the apportionment targets in the London Plan, which it states provide “high level benchmarks for local planning.” It also acknowledges that it is likely that waste planning authorities outside London will need to take some of the Capital’s waste.

### **3. Regional policy context**

#### **The London Plan**

- 3.1. The London Plan consolidated with alterations since 2011 was published in March 2016 following public consultations to four sets of alterations and two Examinations in Public. The waste section has been updated but the general strategy is fundamentally the same – the Mayor supports the continuing move towards greater self-sufficiency in waste management, setting targets for managing the equivalent of 100% of London’s waste within London.
- 3.2. The Mayor believes that making better use of waste has a major role to play in tackling climate change and that it is a valuable resource that should be exploited for London’s benefit. He recognises that waste may still be exported out of London in the short term whilst markets are still developing but this should only be considered as an interim option. Equally, the Mayor encourages the flow of appropriate materials into London where economically beneficial.
- 3.3. Under the Planning and Compulsory Purchase Act 2004, development plan documents (also known as ‘local plans,’ which include Core Strategies) are required to be in general conformity with the London Plan. The London Plan sets out strategic policies that the London boroughs are expected to take into account when preparing their Local Plans and in taking decisions on planning applications.

#### London Plan Policy 5.16

- 3.4. Policy 5.16 (waste net self-sufficiency) sets the strategic aims:
  - to manage as much of London’s waste within London as practicable, working towards managing the equivalent of 100% of London’s waste by 2026;
  - to create positive environmental and economic impacts from waste processing; and,
  - to work towards zero biodegradable or recyclable waste to landfill by 2026.
- 3.5. This will be achieved by:
  - minimising waste;
  - encouraging the reuse of and reduction in the use of materials;
  - exceeding recycling/ composting levels in local authority collected waste of 50% by 2020 and aspiring to achieve 60% by 2031;
  - exceeding recycling/ composting levels in commercial and industrial waste of 70% by 2020;
  - exceeding recycling and reuse levels in construction, excavation and demolition waste of 95% by 2020;
  - improving London’s net self-sufficiency through reducing the proportion of waste exported from the capital over time; and,



- working with neighbouring regional and district authorities to co-ordinate strategic waste management across the greater southeast of England.

#### London Plan Policy 5.17

- 3.6. Policy 5.17 (waste capacity) provides the policy framework for decision making on waste management proposals including opportunities for CHP, sets requirements for developments adjacent to waste management sites and for waste facilities in new development, and sets the requirement, and the criteria, for London boroughs in allocating land for waste capacity in their Local Plans.
- 3.7. London boroughs must allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the London Plan. London boroughs may collaborate by pooling their apportionment requirements. Boroughs need to consider capacity through site allocations in Local Plans to meet their apportionments. Boroughs should aim to meet their apportionment as a minimum and should identify suitable additional sites for waste including waste transfer sites where practicable. Boroughs working collaboratively must demonstrate that their joint apportionment targets will be met, for example through the preparation of joint waste DPDs, joint evidence papers or bilateral agreements.
- 3.8. Land to manage borough waste apportionments should be brought forward through:
- protecting and facilitating the maximum use of existing waste sites;
  - identifying sites in strategic industrial locations;
  - identifying sites in locally significant employment areas; and,
  - safeguarding wharves.
- 3.9. If, for any reason, an existing waste management site is lost to non-waste use, an additional compensatory site provision will be required that normally meets the maximum throughput that the site could have achieved.
- 3.10. The methodology for calculating the London borough apportionments (from 2007) remains the same, but the borough projections have been reviewed, as have the apportionments themselves. The revised figures based on 2009/10 data show a 40% drop in commercial and industrial waste arisings apportioned compared with the 2011 London Plan figures. The Mayor acknowledges that the new figure may represent an underestimate of London's waste arisings due to the economic downturn. Nonetheless, it is considered the most current and best available.
- 3.11. Waste is considered to be managed in London if:
- it is used in London for energy recovery;
  - it relates to materials sorted and bulked in London facilities for reuse, reprocessing or recycling;
  - it is materials reused, recycled or reprocessed in London; and,

- it is a biomass fuel.

3.12. There remains a difference between the waste projected to be generated within London and waste to be managed in London, and it is expected that non-apportioned waste will be exported.

3.13. The table below is extracted from London Plan 2016 table 5.3, setting out waste apportionments per southeast London borough and the City in tonnes per annum in five-year tranches (HH = household waste and C&I = commercial and industrial waste). The percentage share refers to the apportionment percent share of waste to be managed by each London borough (the London total being 100%, although the City has no percentage share and therefore its waste apportionment share is over and above the 100% for London).

3.14. London boroughs may collaborate by pooling their apportionment requirements, and as such, totals for the southeast London boroughs' (including the City) combined apportionment requirements are included. It is these totals that this joint waste technical paper establishes can be met within the sub-region. Provided that the aggregated total is met, the London Plan does not require boroughs to meet both the municipal and commercial/ industrial apportionment figures individually

	Southwark	Bexley	Bromley	City	Lewisham	Royal Greenwich	southeast totals
<b>HH</b>	69,000	126,000	69,000	50,000	57,000	92,000	
<b>C&amp;I</b>	103,000	189,000	103,000	50,000	86,000	138,000	
<b>2016</b>	172,000	315,000	172,000	100,000	143,000	229,000	1,131,000
<b>HH</b>	82,000	150,000	82,000	50,000	68,000	109,000	
<b>C&amp;I</b>	117,000	214,000	117,000	50,000	97,000	156,000	
<b>2021</b>	199,000	364,000	199,000	100,000	166,000	265,000	1,293,000
<b>HH</b>	100,000	184,000	100,000	50,000	84,000	134,000	
<b>C&amp;I</b>	138,000	253,000	138,000	50,000	115,000	184,000	
<b>2026</b>	238,000	437,000	238,000	100,000	199,000	318,000	1,530,000
<b>HH</b>	103,000	189,000	103,000	50,000	86,000	138,000	
<b>C&amp;I</b>	139,000	255,000	139,000	50,000	116,000	185,000	
<b>2031</b>	242,000	444,000	242,000	100,000	202,000	323,000	1,553,000
<b>HH</b>	106,000	195,000	106,000	50,000	89,000	142,000	
<b>C&amp;I</b>	141,000	258,000	141,000	50,000	117,000	187,000	
<b>2036</b>	247,000	453,000	247,000	100,000	206,000	329,000	1,582,000
<b>% share</b>	3%	5.5%	3%	n/a	2.5%	4%	

Table 2: London Plan 2016 waste apportionment requirements for the sub-region (from table 5.3)

## The Mayor's Municipal Waste Management Strategy

- 3.15. The Mayor's waste plans for London were previously set out in two strategies from 2011: *London's Wasted Resource*, on the management of municipal waste, and *Making Business Sense of Waste*. These two documents have been combined and updated in the London Environment Strategy (2018) where the London Waste and Recycling Board, local authorities and businesses work together to deliver cost effective waste and recycling services in London.
- 3.16. The London Plan sets the waste policies (as summarised above) and the strategy sets out the Mayor's preferred approach for managing London's municipal waste to 2050 through these policies along with proposals for:
- Setting minimum recycling standards including for separate food waste collection;
  - Establishing stronger rules to cut pollution from managing and disposing of waste;
  - Reducing food and packaging waste by 50% by 2030;
  - Promoting shared waste collection services;
  - Ensuring enough sites to manage waste through the Mayor's planning powers; and
  - Lobbying government to provide additional funds.
- 3.17. The Strategy aims to make London a zero-waste city by 2050. By 2026 no biodegradable or recyclable waste will be sent to landfill, and by 2030, 65% of London's municipal waste will be recycled.
- 3.18. The reduction of waste and the recycling targets have a direct impact on London's waste self-sufficiency. The strategy also sets out how, through the London Waste and Recycling Board, the Mayor will help develop more waste management infrastructure in London.
- 3.19. With the Mayor's focus on making better use of waste in order to tackle climate change, a greenhouse gas emissions performance standard (EPS) has been developed for all of London's municipal waste management activities, supporting waste and recycling services, technologies and techniques delivering the greatest carbon dioxide and cost saving benefits.
- 3.20. The Mayor of London has not set local targets within the Environment Strategy but instead included a proposal which expects each local authority to develop a Reduction and Recycling Plan (RRP) and set its own reduction and recycling targets that contribute to the Mayor's London-wide targets. Those local targets should be stretching and recognise local circumstances. The Mayor has asked Resource London to help local authorities develop their RRP's.

## 4. Local policy context

### London Borough of Southwark

#### New Southwark Plan: Proposed Submission Version

- 4.1. This paper has been prepared to support the examination of the New Southwark Plan (NSP). The proposed submission version of the plan was published on the 25 October 2017 and the Council concluded consultation on 12 February 2018. The proposed submission version (amended policies January 2019) was published for consultation until 21 May 2019.
- 4.2. The NSP will replace the Council's currently-adopted local plan, comprised of the saved Southwark Plan policies (2007) and the Core Strategy (2011). The plan will be submitted in December 2019 with examination anticipated for early 2020.
- 4.3. The NSP contains both strategic and detailed development management policies, site allocations and spatial policy designations on the proposed policies map. Strategic policy 6: 'Cleaner, greener, safer' sets out how the council will commit to increasing recycling and reducing landfill waste and minimising the impact of the built environment on the natural environment through sustainable development.
- 4.4. The plan has two relevant detailed policies to waste management: P61: 'Reducing waste' and P62: 'Land for waste management.' P61 relates to the requirement for waste to be minimised in the design and construction of development and provide adequate recycling, composting and waste disposal arrangements. P62 relates to the safeguarding of land for waste management purposes in the borough. The policy also sets out the criteria that any new waste management facilities proposed in the borough must meet, including being located on a suitable site which does not cause unacceptable harm to residential amenity, the environment or transport network and that any facility is designed according to the principles of sustainable waste management.
- 4.5. The plan identifies the Integrated Waste Management Facility (IWMF) as the safeguarded waste site for the borough in order to contribute to meeting the borough's apportionment targets. This paper, including the figures presented in the tables, has been prepared on this basis. The NSP designates the land on which the IWMF is located has been designated as Strategic Protected Industrial Land (SPIL).
- 4.6. The IWMF is of major strategic importance for Southwark. It provides the capacity to enable Southwark to manage its municipal waste arisings and enable the recycling and composting targets for the borough to be met in accordance with Southwark's Waste Management Strategy (see below). The facility incorporates mechanical biological treatment plant, a waste transfer station, a materials recovery facility and a household waste re-use and

recycling centre. It has a current actual throughput of 173,000 tonnes per annum (excluding the waste transfer and household waste reuse and recycling functions).

- 4.7. The proportion of the WWMF's waste processing capacity which contributes to the borough's apportionment target is, at 2016, 104,850 tonnes per annum (tpa). The borough's prescribed apportionment target is 172,000tpa, representing a shortfall of 67,150tpa in throughput capacity. According to the London Plan 2016, in 2036 the borough is required to have the capacity to meet an apportionment target of 247,000tpa. However, as per the methodology set out in para 1.29, the modelled capacity of the WWMF at 2036 is 111,150tpa. Therefore, there is anticipated to be a shortfall 135,850tpa.
- 4.8. In developing the approach set out in the NSP the Council and the Waste Planning Group members undertook capacity/apportionment testing to understand the impact on the borough's and the Waste Planning Group's ability to meet the prescribed apportionment targets individually and collectively. Following demonstration of a collective surplus with the proposed NSP scenario, the Council secured provisional agreement to the proposed approach with Waste Planning Group members. The approach necessitated the other Waste Planning Group members meeting the Council's apportionment target shortfall through their combined extra capacity (as allowed for in London Plan policy 5.17 clause F). The agreement was provisional owing to the uncertainty of the apportionment targets proposed in the new draft London Plan. Shortly prior to the publication of this paper the draft new London Plan was published for consultation. In response to this, the draft revised apportionment targets proposed in the plan have been addressed in Appendix C, demonstrating that the Waste Planning Group retains the collective surplus it currently has against the London Plan 2016 targets.
- 4.9. Alongside the New Southwark Plan, the Council is also preparing the Old Kent Road Area Action Plan (OKR AAP) following the designation of the Old Kent Road Opportunity Area in the London Plan 2015. The AAP will set out the strategy for meeting the anticipated growth and demand for housing, jobs and associated infrastructure, including the Bakerloo Line Extension (BLE). The WWMF, which comprises the proposed safeguarded waste site being taken forward in the NSP, is located within proposed Strategic Protected Industrial Land (SPIL) within the Old Kent Road Opportunity Area. Policy P28 in the NSP provides the opportunity for this area of SPIL to be released from this designation, and therefore provide for the opportunity for comprehensive, high density mixed use redevelopment of the site "providing the criteria of policy P62 are fulfilled."
- 4.10. Further information justifying the Council's approach will be set out in the Waste & Environment background paper.

## Municipal waste management strategy

4.11. Southwark's Waste Management Strategy (2003-2021) sets out the council's proposals for moving Southwark towards more sustainable waste management. The Executive approved the Waste Management Strategy on 2 December 2003, the key features, as set out in the executive summary are:

- a reduction in the amount of municipal solid waste generated in Southwark to below 2% by 2010. In real terms, due to population growth (estimated at a further 27,000 residents by 2021) the absolute amount of waste will rise but the strategy aims to deliver a decrease in the actual rate of growth;
- achievement of 30% recycling and composting standards for household waste by 2010-11 and 40% by 2015-16 and 50% standards by 2020-21; and
- recovery of value from 45% of municipal solid waste by 2010-11, 67% by 2015-16 and 75% by 2020-21.

4.12. The Waste Management Strategy included a two-stage options appraisal analysis to identify a 'best technical and best value option' for improving waste management in Southwark. The options appraisal process included a financial, environmental and best practicable environmental option analysis. Fourteen options were considered at the first stage and four options plus a 'do-nothing' option at the second stage.

4.13. The Executive approved the recommended 'best technical and best value option' on 18 May 2004 and initiated an application for Private Finance Initiative (PFI) credits to the Government through development of an outline business case. This resulted in the PFI partnership between Southwark and waste management service provider Veolia being established to manage waste in Southwark up to 2033, including the IWMF and implementing the key features of the best technical and best value option.

4.14. The key features of the Council's best technical and best value option were:

- an intensive education and waste minimisation programme introduced, and education facility constructed;
- kerbside dry recyclable (paper, glass, cans etc.) collections expanded to include all recyclables from street (non-high rise) properties;
- medium and high-rise properties issued with survival bags for the collection of dry recyclables;
- an increase in the number of 'bring' recycling sites (e.g. bottle and paper banks) to 350 sites;
- organic kitchen and garden waste collected from street properties composted in an in-vessel compost (IVC) facility;
- dry recyclable material collected at the kerbside separated at a materials recycling facility (MRF);
- recyclable waste from medium and high-rise properties separated at a materials separation plant (MSP);

- Recovery and recycling of bulky and fly-tipped waste maximised; and
- All residual (non-recycled) waste sent to a mechanical and biological treatment (MBT) plant for further recycling and to generate a fuel used to generate power at an existing energy recovery facility.

### Waste Minimisation Strategy

4.15. Prior to Southwark Council's contract with Veolia, Southwark's Waste Minimisation Strategy (2007 – 2010) set out the proposals for addressing waste growth by minimising household waste. Veolia Environmental Services have assumed responsibility for the implementation and monitoring of the Strategy in the medium and longer term.

## **London Borough of Bexley**

### Relevant local plan policies

- 4.16. Bexley has a Core Strategy that sets out specific policies proposals for waste management, including safeguarding the strategic waste sites identified within this joint waste technical paper, along with specific policy criteria to assess applications for new waste management facilities. The Core Strategy was adopted in February 2012.
- 4.17. Core Strategy policy CS20 ensures that land resource is available to implement government policy and EU Directives on waste. Bexley has the second highest London Plan waste apportionment requirements, has enough existing operational waste facilities to meet its requirements, and works with the City and the other southeast London boroughs to make the most efficient use of its surplus capacity.
- 4.18. Under the provisions of the Planning and Compulsory Purchase Act 2004, the Bexley Unitary Development Plan (UDP), adopted July 2004, was saved for a period of three years, which expired in September 2007. After this time, many Bexley's UDP policies continue to direct local planning policy in the borough, having been saved until their replacement by policies set out in Local Development Framework (LDF) development plan documents (DPDs), through a Direction by the Secretary of State.
- 4.19. However, many UDP policies relating to waste have been allowed to expire by the Direction. Saved UDP policies that pertain to development of waste facilities, can be found within Part 2 policies (E1 and ENV39 – ENV41) relating to employment and the environment. The detail of these saved policies are as follows:
- Policy E1 sets out criteria for proposals for development for industrial and commercial uses, including waste;
  - Policy E3 sets out the borough's Primary Employment Areas in accordance with Policy G14; and,

- Policies ENV39 – ENV41 provide additional environmental criteria to ensure that proposals for new development will not have any adverse effects on the surrounding built and natural environment.

#### Other relevant policy and guidance

4.20. The Council is committed to the requirements of the London Plan Policies 5.16 and 5.17, in line with the guidance set out in the National Planning Policy for Waste, dated October 2014, and undertakes to work with other waste planning authorities to identify sub-regional requirements for waste management facilities and promote sites to manage the non-municipal controlled waste arising within Bexley.

#### Future local plan policies<sup>9</sup>

4.21. Bexley has begun work on the production of a new Local Plan to replace the existing Core Strategy and Saved UDP Policies documents, including the existing waste management policies.

4.22. Bexley endorsed its Local Development Scheme on 28 October 2019, which sets out a timetable for production of a local plan. Bexley's Local Plan is timetabled for adoption by the end of 2021.

4.23. The Council undertook a seven week public consultation on the 'Bexley Local Plan: Preferred approaches to planning policies and land use designations (Regulation 18)', between 15 February and 7 April 2019. This is the first stage in the Local Plan review process

#### Municipal waste management strategy

4.24. Bexley is a Waste Disposal Authority and has responsibilities for its own contracts in the collection and disposal of waste. Bexley has an adopted Municipal Waste Management Strategy that is currently under review.

4.25. Bexley has an even bigger challenge with this next generation waste strategy as it seeks to tackle the more difficult materials remaining in the waste stream within a demanding financial landscape. The Council must further develop the future of waste management in its area to comply with new European obligations and national targets.

4.26. Long term strategic planning is vital to all authorities in securing both the infrastructure and service developments necessary to deliver more sustainable waste management. It is of vital importance that the management of waste is driven up the waste hierarchy with prevention being at the top and disposal being at the bottom.

4.27. In order to meet declared policies and objectives and to address the demands made by statutory and other drivers, the Council is committed to:

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<sup>9</sup> <https://www.bexley.gov.uk/services/planning-and-building-control/planning-policy/local-plan-review>



- reduce waste growth: raise awareness of waste issues and the importance of waste reduction in order to slow the future growth in waste arisings;
- sustainable waste management: by using the waste hierarchy as a sensible framework ensure that all waste arisings in Bexley's area are dealt with in the best practicable and environmentally friendly way to continue Bexley's reputation for being a green borough;
- meet recycling targets: increase as far as is practicably possible and economically viable the amount of waste that is recycled and composted in Bexley to maintain our historical high level of recycling;
- deliver best value: develop integrated and complementary collection methods so as to maximise the economies of scale and maintain a high service standard to the public;
- be flexible: Bexley will make sure that it is ready to respond to change in regulatory and relevant market conditions and emerging technologies; and,
- improve inclusion: engaging with the public, local businesses and community organisations to ensure that objectives described above can be achieved.

4.28. The overall themes of the strategy are:

- preventing waste at source;
- enhancing recycling services to maximise recycling as close to source as possible and achieve a 60% recycling rate by 2020;
- maximising the value of the remaining waste;
- driving efficiencies across the service; and,
- engaging communities.

4.29. The activities outlined will be subject to ongoing and regular review to ensure they achieve their sustainability objectives and continue to demonstrate best value.

#### Future growth

4.30. Bexley's Growth Strategy proposes a coordinated approach to growth across the whole borough, focussing on the areas that are likely to accommodate most growth. These are, predominantly in the north of the borough, within areas designated by the Mayor of London as Opportunity Areas. Subject to the provision of the right levels of infrastructure, in the right locations, the document sets out how up to 31,500 new homes and 17,500 new jobs can be delivered across the borough.

## **London Borough of Bromley**

#### Waste strategy

4.31. The Council's draft Waste Management Strategy and Waste Minimisation Plan has underpinned the directional change and improvements to the performance of services to both the benefit of service users and the overall performance of

the waste management service. The objectives of this approach enable Bromley to:

- achieve a reduction in waste arisings to consistently below the London average;
- maintain its recycling rate at above the London average;
- meet and exceed its landfill diversion targets;
- minimise costs to council tax payers; and,
- provide residents with clear information by which services can be evaluated.

4.32. The Council's aim is to run the best value waste and recycling service in London. Bromley's recycling performance is already excellent compared with many other London boroughs and the latest annual data shows Bromley has London's second highest recycling rate (2015/16).

4.33. With recent increases in overall waste production by households, there appears to be a 50% ceiling for waste that can be recycled, and this is difficult to break through without significant changes being made to the waste collection service design. Immediately, the Council will be focusing on both improving the quality of the recyclate collected and the proportion of food waste recycled.

4.34. The longer term aim is to utilise future commissioning programmes to provide further service innovations in order to;

- reduce waste production;
- increase recycling participation;
- increase recyclate capture rates of card, paper and food waste;
- improve the overall quality of recyclates; and,
- minimise and eliminate our reliance on landfill as a disposal option.

4.35. Bromley's recycling rate is excellent, but the amount of waste produced per household is still not favourable. While the figure is no longer among the highest (478kg 2015/16) in London, high waste arisings continue to impose cost pressures on the on the service and suppresses the borough's recycling rate.

4.36. Landfill Tax also imposes cost pressure on the Council but in making landfill less attractive it achieves its secondary purpose of increasing the financial viability of recycling. There are also environmental benefits associated with reducing waste and increasing recycling, which is important given that natural resources are limited.

4.37. The Council is developing further solutions using alternative disposal options to make much better use of the materials and energy contained in the waste stream from materials that have yet to be diverted to recycling processes.

- 4.38. Producing less waste in the first place is key to reducing costs and environmental impacts. The Council will therefore work with residents to encourage less waste and greater recycling through the 'Recycling for All' and 'Composting for All' schemes. Through the operation of reliable and accessible recycling services, objectives are to:
- derive improved financial value of the materials recycled;
  - meet the requirements of the end-user for the material collected;
  - ensure that sufficient market capacity is available for materials; and,
  - maintain performance and endeavour to reduce waste production.
- 4.39. The Council has planned improvements in the provision of further kerbside collections services to maximise captures rates, divert and reduce car reliance by service users in accessing services by providing these at the home. For example, a highly green waste collection service and waste electrical and electronic equipment service has been delivered to customers, as this is preferential to residents using cars to take their green waste or WEEE to the reuse and recycling centres.
- 4.40. The current strategy and future development of services through the commissioning strategy will provide more opportunities to recycle an even wider range of materials at the borough's two reuse and recycling centres, which will improve the service sustainability and increase customer satisfaction. The Council is committed to:
- delivering value for money in waste management services;
  - planning services to take account of potential increases in cost;
  - minimising risk by avoiding over-reliance on a single waste management option;
  - taking account of what other authorities are doing and build on best practice;
  - managing waste in ways that protect human health and the environment, both for the short term and in the longer term to seek to meet the needs of future generations;
  - meeting and exceeding customer expectations, for all service users; and,
  - working towards delivering 'excellent' services, including achieving and even exceeding our statutory targets.
- 4.41. The overarching objective is to manage waste in accordance with the waste hierarchy, seeking to reduce the amount of waste produced first and breaking the link between economic growth and the amount of waste produced. The Council views waste as a resource to be put to good use with disposal being the last option for management.

#### Bromley Local Plan Policies

- 4.42. Bromley adopted its Local Plan in January 2019. It includes two waste management policies and allocates three strategic waste sites.

**Policy 112: Planning for sustainable waste management**

The Council will support sustainable waste management by:

- i. implementing the waste hierarchy in its approach to future waste management;
- ii. allocating the strategic waste management sites of Waldo Road, Churchfields and Cookham Road and safeguarding them for waste uses only;
- iii. working in collaboration with the London boroughs of Bexley, Greenwich, Southwark, Lewisham and the City of London to make optimum use of waste management capacity in the southeast London sub region; and,
- iv. meeting the London Plan waste apportionment targets.

**Policy 114: new waste management facilities, and extensions and alterations to existing sites**

New waste management facilities and extensions and/ or alterations to existing waste management facilities must demonstrate that they will not undermine the local waste planning strategy and help the Borough move up the waste hierarchy.

The likely impact of the proposal on the local environment and on amenity will be considered against the development plan as a whole and the specific criteria for waste management facilities set out in the London Plan and national policy. New facilities, extensions and alterations should be well designed and contribute positively to local character as far as possible.

Prospective developers of new waste management facilities will be expected to look to the Strategic Industrial Location in the Cray Business Corridor and then other industrial areas before other previously developed land. New waste facilities in industrial areas will only be acceptable where the proposed use does not impede effective operation of other nearby businesses nor undermine the primary function of the designation.

- 4.43. Bromley is safeguarding three strategic waste sites, the details of which are set out in the appendices to this joint waste technical paper.
- 4.44. Waldo Road (see map in Appendix B) is a Council run reuse and recycling facility, incorporating a household waste recycling centre, a waste transfer station, vehicle repair facilities and a depot area providing a base for the operation of municipal waste collection and disposal activities.
- 4.45. Churchfields Road (see map in Appendix B) is a Council run reuse and recycling facility, incorporating a household waste recycling centre, a waste transfer station and a depot area providing a base for the operation of municipal waste collection and disposal activities.
- 4.46. The Swanley recycling centre at Cookham Rd (see map in Appendix B) is an open composing facility, currently run by Tamar Organics.

4.47. In order to give some guidance to prospective applicants for any new waste management facilities, the Council has set out the expectation that a sequential approach should be taken when looking for sites.

## **City of London**

### New City Plan 2036: Proposed Submission Version

4.48. The City Corporation is currently reviewing the 2015 City of London Local Plan for which this paper has been prepared to support. The CityPlan 2036 submission version will be published for a six-week consultation period in early 2020 and will replace the City Corporation's currently adopted local plan (2015). The draft plan has been through committee and Members had no concerns about the new section on waste.

4.49. The draft plan encompasses the relevant policies contained in the 2015 Local Plan. Additionally, policy wording has been added which emphasises the importance of and promotes circular economy principles. Circular economy principles are relevant to the design of buildings, waste prevention and minimisation and waste treatment, storage and collection facilities.

The draft plan contains both strategic and detailed development management policies and a spatial policy designation on the proposed policy map.

Strategic Policy S16: Circular Economy and Waste is set out below:

1. The City Corporation will support businesses and residents in moving towards a Zero Waste City but applying circular economy principles, the waste hierarchy and the proximity principle at all stages of the development cycle.
2. The City Corporation will actively co-operate with other Waste Planning Authorities in planning for capacity to manage the City's residual waste through:
  - Identifying waste management capacity in the City, or elsewhere in London, to meet the City's London Plan waste apportionment target, including through partnership working with other Waste Planning Authorities in London.
  - Co-operating with Waste Planning Authorities within and beyond London to plan for suitable facilities for the City's waste.
  - Safeguarding Walbrook Wharf as a waste site and wharf suitable for the river transport of waste;
  - Monitoring waste movements to and from the City and reviewing its waste arising and capacity study at least every five years.

4.50. The draft plan contains three detailed policies relevant to waste management:

- CEW1: Zero Waste City – Encouraging development to be designed to promote circular economy principles throughout the life cycle of the building;

- CEW2: Sustainable Waste Transport – Seeking to minimise the environmental impact of waste transport;
- CEW3: New Waste Management Sites – Requiring proposals for new waste management facilities to minimise adverse impacts.

#### Future plans for waste

- 4.51. The City of London Local Plan Core Strategic Policy CS17.2(i) identifies London Borough of Bexley as the City's partner borough for waste planning to meet the London Plan waste apportionment. The Bexley Core Strategy includes provision for working with other London boroughs to make the most efficient use of any surplus capacity after the London Plan apportionments have been applied.
- 4.52. The London Plan sets a waste apportionment of 100,000 tonnes for the City of London. Evidence shows that, with current technology and economic considerations, there is no viable waste management capacity within the City's boundary.
- 4.53. London Borough of Bexley has therefore entered into an agreement with the City of London Corporation to use a proportion of Bexley's surplus waste management capacity to ensure that the City of London's waste apportionment requirements can be met. This builds on the sustainable transport links via the River Thames from the City's waste transfer station at Walbrook Wharf to the Riverside Resource Recovery energy from waste facility in Belvedere.
- 4.54. For commercial reasons, a proportion of the City's waste is likely to continue to be transported to sites outside London. This includes construction, demolition and excavation waste which is not subject to apportionment targets in the London Plan. Annual monitoring of such waste exports using the Environment Agency's Waste Data Interrogator will inform Duty to Cooperate discussions within and outside London to identify and resolve waste management capacity issues for the City's waste.

#### Municipal waste management strategy

- 4.55. The City of London is a Waste Disposal Authority and has responsibilities for the collection and management of municipal waste arising in the City.
- 4.56. The City of London Waste Strategy 2013-2020 was adopted in January 2014. This strategy promotes nine objectives supporting the circular economy and the movement of waste up the waste hierarchy taking account of the cost and carbon implications of alternative options. The strategy commits the City to:
- Reducing waste arisings – aiming to reduce the rate of growth in waste generated per household through publicity/education campaigns and promotion of the City's recycling services with the objective of achieving a 20% reduction in waste arisings per household by 2031.

- Increasing waste recycling – Aiming to increase recycling rates for household waste to 50% by 2020 and 60% by 2031 in line with the national waste strategy
- Recovering energy from residual waste - Riverside energy from waste plant is the preferred option for management of the City's residual waste. This makes use of the sustainable river-based transport route from the City's waste transfer station at Walbrook Wharf.
- The City of London plans to produce a new strategy which will cover the period from 2021 to 2027.

## **London Borough of Lewisham**

### Relevant local plan policies

- 4.57. Lewisham has an adopted Core Strategy (June 2011) that contains a strategic objective to deliver sustainable waste management. The corresponding policy CS13 states that the Council will take a partnership approach to sustainable waste management, which will enable it to exceed targets for municipal, industrial and construction waste, and recycling.
- 4.58. In addition, the policy requires all new major developments to submit and implement a site waste management plan, designed to address existing and long-term waste management and disposal needs incorporating recycling facilities in all new development.
- 4.59. Core Strategy Policy 13 outlines the Council's objective to meet the London Plan annual apportionment figures via the waste facilities at Landmann Way (SELCHP, Hinkcroft (now referred to as SSSI Limited) and LBL Recycling Centre), all of which are contained within the London Plan Surrey Canal Strategic Industrial Location designation. This designation is protected by Core Strategy Policy 3, which undertakes to maintain these areas for uses within the B Use Class (B1c, B8 and where appropriate B2 industry) as well as appropriate Sui Generis uses, to provide land for activities such as waste management that support the continuing functioning of London. These three waste management sites are also safeguarded in the Site Allocations Local Plan (May 2013).
- 4.60. Lewisham is currently in the process of undertaking a Local Plan review to inform the preparation of a new Local Plan. A Regulation 18 'Consultation on Main Issues' document was published in October 2015. The consultation document outlined Lewisham Council's proposal to continue to protect its employment land stock and to safeguard the three strategic waste management sites in the Local Plan. It also set out policy objectives to continue to seek a decrease in the amount of waste generated by new development, including on-site construction and demolition waste, along with increasing recycling and composting. The consultation document provided an indication of some of the considerations that may need to be addressed in

greater detail by the new Local Plan to support strategic waste management and recycling objectives.

- 4.61. The Council's latest Local Development Scheme (January 2018) is currently being reviewed to take account of the current stage of plan preparation, taking into consideration the programme for future public consultations and the expected timescales for the outcomes of the London Plan examination process.

#### Waste Strategy

- 4.62. Lewisham Council has a clear vision for the sustainable management of its waste and pursues an efficient, high quality, cost-effective and sustainable approach to the collection and management of waste, through its commitment to the principles of the waste hierarchy, sustainable development and best value. The Council is actively responding to the environmental, financial and legislative imperatives (including the Government target to recycle and compost 50% by 2020) in addition to the practical constraints and issues within the borough
- 4.63. Lewisham is working to improve environmental performance through raising the recycling rate, altering the way services are offered to reduce the generation of waste, and ensuring that all fleet vehicles are ULEZ compliant to minimise our carbon footprint.
- 4.64. The Council undertook a public consultation in 2015 on the future of household waste services within the borough. The aim of the consultation was to gather residents' views about how the Council might change the way in which waste and recycling services are collected from houses and flats in houses (dwellings that typically have collections from a wheelie bin) to improve the borough's environmental and financial performance. Following this consultation, the council implemented a garden waste subscription service and began the roll out of a food waste collection service. Initially the food waste service was introduced to approximately 80,000 kerbside properties, the Council is working to expand the service across the borough.
- 4.65. In addition, an assessment was carried out to evaluate the local authority's performance against the Waste Regulations 2012 and the Regulation 13 requirement to collect waste paper, metal, plastic and glass separately, unless not technically, environmentally or economically possible to do so. In absence of access to a waste transfer station, the Council is pursuing a comingled recycling strategy, whilst taking forward reforms in the collection of food and garden waste.
- 4.66. The council is in the process of developing a new waste management strategy and is currently working to produce its Reduction and Recycling Plan (RRP) in line with the Mayor of London's Environment Strategy. The Council is in the third and final phase of the RRP preparation process.



## Royal Borough of Greenwich

### Royal Greenwich Local Plan: Core Strategy with Detailed Policies

- 4.67. Policy IM2 Waste Apportionment sets out that the Royal Borough will contribute to the sustainable management of waste in Royal Greenwich by working with the other southeast London boroughs by pooling the boroughs' waste allocations and identifying sites within the sub-region that will meet the combined London Plan waste apportionment figure. The supporting text for this policy identifies the four safeguarded sites in Royal Greenwich and notes that this does not preclude other sites coming forward for waste uses in the future, with development proposals to be evaluated against the criteria in London Plan policy 5.17B. Appropriate areas of search for new waste management facilities are the areas of designated strategic industrial land as identified on the Core Strategy Policies Map.
- 4.68. In addition, the Core Strategy states that the Royal Borough will continue to seek to reduce waste arisings. Where this is not possible, the Royal Borough will follow an approach based on the waste hierarchy; encouraging re-use, then recycling and composting before energy recovery and disposal; providing support with appropriate infrastructure. Core Strategy policy DH1 Design provides guidance regarding provision for waste within developments.

### Royal Borough of Greenwich Waste Strategy 2016-2025

- 4.69. RBG's Waste Strategy (2016-2025) was developed to enable the Royal Borough to achieve a more sustainable approach to municipal waste management. The document explains the current practices, the key pieces of legislation that impact how waste is managed, the opinions of residents, businesses and collection staff, and highlights future drivers for change in Royal Greenwich.
- 4.70. The Waste Strategy will guide future municipal waste policy within RBG for the period up to the year 2025, helping Greenwich move towards a more sustainable society.
- 4.71. The Strategy aims to:
- Address reducing recycling rates
  - Use data to gain a greater understanding of performance and identify opportunities for improvement
  - Improve and expand the range of services offered to residents
  - Manage the challenges presented by the growing population whilst ensuring efficient, safe waste collections which maximise recycling.
  - London Environment Strategy: Royal Borough of Greenwich Reuse and Recycling Plan (RRP)

- 4.72. As part of the Mayor's London Environment Strategy, boroughs are required to submit an RRP to demonstrate how it is acting in conformity with the Strategy, unless there is excessive cost in achieving compliance.
- 4.73. RBG is currently in consultation with the GLA on the content of its draft and will be entering an internal and mayoral approval process following initial agreement.

## Appendix A: London Plan borough level projections, apportionment requirements and capacity figures

Local Planning Authority/Year	2016	2021	2026	2031	2036
Bexley	216,000	219,000	222,000	226,000	230,000
Bromley	239,000	243,000	248,000	251,000	256,000
City of London	214,000	213,000	213,000	215,000	217,000
Lewisham	192,000	198,000	203,000	208,000	212,000
Royal Greenwich	192,000	196,000	201,000	204,000	208,000
Southwark	274,000	278,000	283,000	287,000	292,000
<b>total</b>	<b>1,327,000</b>	<b>1,347,000</b>	<b>1,370,000</b>	<b>1,391,000</b>	<b>1,415,000</b>

Table 3: London Plan borough level projections (Table 5.2) (tonnes per annum)

Local Planning Authority/Year	2016	2021	2026	2031	2036
BEXLEY	315,000	364,000	437,000	444,000	453,000
BROMLEY	172,000	199,000	238,000	242,000	247,000
CITY OF LONDON	100,000	100,000	100,000	100,000	100,000
LEWISHAM	143,000	166,000	199,000	202,000	206,000
ROYAL GREENWICH	229,000	265,000	318,000	323,000	329,000
SOUTHWARK	172,000	199,000	238,000	242,000	247,000
<b>TOTAL</b>	<b>1,131,000</b>	<b>1,293,000</b>	<b>1,530,000</b>	<b>1,553,000</b>	<b>1,582,000</b>

Table 4: London Plan apportionment requirements (Table 5.3) (tonnes per annum)

Southeast London boroughs' capacity from safeguarded operational strategic waste management facilities and potential waste sites (details in tables 3 and 4 on following pages)

Local Planning Authority/Year	2016	2021	2026	2031	2036
Bexley	1,051,789	1,051,789	1,051,789	1,051,789	1,051,789
Bromley	95,240	95,240	95,240	109,288	109,288
City of London	0	0	0	0	0
Lewisham	513,366	513,366	513,366	513,895	513,895
Royal Greenwich	124,916	124,916	124,916	131,737	131,737
Southwark	110,050	110,050	110,050	115,050	115,050
<b>total capacity (tonnes)</b>	<b>1,895,361</b>	<b>1,895,361</b>	<b>1,895,361</b>	<b>1,921,759</b>	<b>1,921,759</b>
<b>projected total surplus</b>					
<b>projected actual surplus capacity</b>	<b>602,361</b>	<b>602,361</b>	<b>365,361</b>	<b>368,759</b>	<b>339,759</b>

Table 5: Capacity from safeguarded sites (detailed breakdown in tables 6 and 7)



Appendix A (continued)

Waste apportionment detailed figures for strategic waste sites for the Southeast London boroughs – reviewed and updated to 31 March 2019

Facility name and address:	Clinical waste incinerator, SRCL Ltd Queen Mary's Hospital, Frogna Avenue, Sidcup, Kent, DA14 6LT	Energy from waste facility, RRRL Land adjacent River Thames, Norman Road, Belvedere, Kent, DA17	Materials recovery facility, Viridor Waste Management Century Wharf, Crayford Creek, Crayford, DA1 4QG	Windrow composting facility, Tamar Cookham Road, Swanley, Kent, BR8 7QP	Walbrook Wharf waste transfer station, City of London Corporation	Energy recovery facility, SELCHP Landmann Way, New Cross, Lewisham, SE14 5RS	Recycling centre, HTL Waste Management Services (Hinkcroft) Landmann Way, London SE14 5RS	Integrated waste management facility Peter Norris (Haulage) Ltd, Norriskips, Greenwich Transfer Station, Horn Link Way, Greenwich, London SE10 0RT	Recycling centre, Day Aggregates (Day Group Ltd) Murphy's Wharf, Lombard Wall, Charlton, London, SE7 7SH	Materials recovery facility and mechanical biological treatment plant, LB Southwark Integrated Waste Management Facility, 43 Devon Street, London SE15 1PD
Facility notes:	Final residual waste disposal facility. The amount listed is the actual throughput, which for this incineration facility is 94% of the permitted capacity shown on the Environment Agency's list of operational incineration facilities (2014). Currently operational.	Final residual waste disposal facility. In March 2015, the Electricity Act consent was increased to 785,000 tonnes per year. The amount listed is the actual throughput, which for this incineration facility is 94% of the permitted capacity. Currently operational.	This facility separates waste and recycling and has a current licensed capacity of 350,000 tonnes per annum. The apportionment capacity is 75% of the permitted capacity. Currently operational.	This is a windrow composting site, accepting green garden waste only for composting. Actual annual throughput is 25,000, with 100% of the treated waste counting towards the apportionment figure. Currently operational.	Waste transfer site, with an annual throughput of 85,000 tonnes. None of the throughput can be counted towards the apportionment capacity. Currently operational	Final residual waste disposal facility. The amount listed is the actual throughput, which for this incineration facility is 92% of the licensed capacity of 464,000 tonnes per annum. Currently operational.	Recycling facility, with a licensed annual throughput of 130,000 tonnes. Capacity shown is the actual recycling tonnage, which is 40% of the permitted capacity. Currently operational.	Materials recycling facility. Pro-rated annual throughput: 35,898 tonnes. Capacity shown is based on pro-rated recycling component of two quarters of 2015. Currently operational.	Materials recycling facility. The site processes 30,000 tonnes of glass waste per annum with an average annual 95% recycling rate, and 250,000 tonnes of C&D waste, with an average annual 99% recycling rate. The amount shown does not include C&D. Currently operational.	Materials recycling facility. Apportionment capacity shown is based on the agreed percentage of the current throughputs for the MRF of 110,000 tonnes per annum (75%) and the MBT plant of 85,000 tonnes per annum (3%). Currently operational.
<b>Operational safeguarded strategic waste management facilities (see Appendix B for detailed site information)</b>										
<b>BEXLEY</b>	<b>7,514</b>	<b>737,900</b>	<b>262,500</b>							
<b>BROMLEY</b>				<b>25,000</b>						
<b>CITY OF LONDON</b>					<b>0</b>					
<b>LEWISHAM</b>						<b>458,720</b>	<b>52,000</b>			
<b>ROYAL GREENWICH</b>								<b>75,660</b>	<b>15,150</b>	
<b>SOUTHWARK</b>										<b>85,050</b>

Table 6: Strategic operational waste management facilities (commercial)

<b>Facility name and address:</b>	<b>Churchfields Road reuse &amp; recycle centre, LB Bromley</b> Churchfields Road, Beckenham, BR3 4QY	<b>Foots Cray reuse &amp; recycle centre, LB Bexley</b> Maidstone Road, Sidcup, DA14 5HS	<b>Landmann Way reuse &amp; recycle centre and waste transfer station, LB Lewisham</b> Landmann Way, New Cross, Lewisham, SE14 5RS	<b>Nathan Way reuse &amp; recycle centre and waste transfer station, RB Greenwich</b> Nathan Way, Thamesmead, London, SE28 0AN	<b>Old Kent Road reuse &amp; recycle centre and waste transfer station, LB Southwark</b> Integrated Waste Management Facility, 43 Devon Street, London SE15 1PD	<b>Thames Road reuse &amp; recycle centre and waste transfer station, LB Bexley</b> Thames Rd, Crayford, DA1 5QJ	<b>Waldo Road reuse &amp; recycle centre and waste transfer station, LB Bromley</b> Waldo Road, Bromley, BR2 9RB	<b>Thames Road Waste &amp; Street Services Vehicle Depot, LB Bexley</b> Thames Rd, Crayford, DA1 5QJ	<b>Old Integrated Waste Management &amp; Recycling Facility, RB Greenwich</b> Nathan Way, Thamesmead, London, SE28 0AN
<b>Facility notes:</b>	Council facility. Average annual throughput: 20,926 tonnes. Capacity shown is actual recycling tonnage (33%) averaged over the last three years. Currently operational.	Council facility. Average annual throughput: 11,465. Capacity shown is actual recycling tonnage (63%) averaged over three years. As part of the new contract, a 70% recycling rate will be expected by 2019/20. Currently operational.	Council facility. Average annual throughput: 5,660 tonnes. Capacity identified is the actual recycling tonnage (41%) averaged over the last three years. Currently operational.	Council facility. Average annual throughput: 93,853 tonnes. Capacity shown is actual recycling tonnage (55%) averaged over three years.	Average annual throughput: 50,000 tonnes. Capacity shown is a 15% recycling rate for general waste - most waste is transferred for sorting/treatment	Council facility. Average annual throughput: 43,446. Capacity shown is actual recycling tonnage (71%) averaged over three years. As part of the new contract, an 80% recycling rate will be expected by 2019/20. Currently operational.	Council facility. Average annual throughput is 128,532 tonnes. Capacity shown is actual recycling tonnage (43%) averaged over the last three years. Currently operational.	Part of the LB Bexley Thames Road R&RC and WTS site, the Council Depot (approx. 2.17 hectares in area) has been safeguarded as a waste site. The capacity is estimated, based on the Jacob Babbie formula of 80,000 tonnes per hectare.	This is a safeguarded site identified in Greenwich's Core Strategy. The capacity is estimated, based on the Jacob Babbie formula of 80,000 tonnes per hectare (site area 0.40ha). Not currently operational.

**Local authority operational safeguarded reuse and recycle centres and waste transfer stations (see Appendix B for detailed site information)**

<b>BROMLEY</b>	<b>6,654</b>						<b>50,278</b>		
<b>BEXLEY</b>		<b>7,451</b>				<b>31,260</b>		<b>173,600</b>	
<b>CITY OF LONDON</b>									
<b>LEWISHAM</b>			<b>2,610</b>						
<b>ROYAL GREENWICH</b>				<b>51,856</b>					<b>32,000</b>
<b>SOUTHWARK</b>					<b>7,500</b>				

**London Plan requirement for an uplift in recycling rate to a minimum of 50% of current average throughputs by 2020**

<b>2021 uplift</b>	<b>7,393</b>	<b>8,149</b>	<b>2,646</b>	<b>34,106</b>	<b>25,000</b>	<b>35,726</b>	<b>62,847</b>		
<b>2026 uplift</b>	<b>8,872</b>	<b>8,149</b>	<b>3,175</b>	<b>40,927</b>	<b>30,000</b>	<b>35,726</b>	<b>75,416</b>		

**London Plan requirement for an uplift in recycling rate to a minimum of 60% of current average throughputs by 2030**

<b>2031 uplift</b>	<b>9,611</b>	<b>8,149</b>	<b>3,440</b>	<b>44,337</b>	<b>32,500</b>	<b>35,726</b>	<b>81,701</b>		
<b>2036 uplift</b>	<b>9,611</b>	<b>8,149</b>	<b>3,440</b>	<b>44,337</b>	<b>32,500</b>	<b>35,726</b>	<b>81,701</b>		

Table 7: Strategic waste management facilities (Council civic amenity sites) and safeguarded potential waste sites

## **Appendix B: Details of individual safeguarded waste sites**

See separate Appendix B document

## Appendix C: Draft new London Plan apportionment requirements

The new draft London Plan was published in early December 2017. There some minor differences in both the presentation and the apportionment targets themselves. This appendix presents an overview of the changes and demonstrates that, according to the modelled capacity for 2036, the Waste Planning Group is still able to meet the total combined apportionment target set in the new draft London Plan and is left with a surplus.

The key changes to the apportionment targets are:

- Presenting the targets at 2021 and 2041, rather than at five year intervals from 2016 – 2036;
- Combining ‘household’ (HH) and ‘commercial and industrial’ (C&I) waste into a single apportionment figure for each borough from the outset, rather than prescribing a target for each HH and C&I as well as the combined total;
- The combined total of the apportionment targets of the Waste Planning Group members at 2021 in the draft new London Plan is higher than the combined 2021 total in the London Plan 2016 – however the group is still left with a surplus; and,
- The combined total of the apportionment targets of the Waste Planning Group members at 2041 in the draft new London Plan is lower than the combined 2036 total in the London Plan 2016 – therefore the group is still left with a surplus when the 2041 target is measured against the 2036 modelled capacity, by virtue of having a surplus against the larger combined apportionment target in the London Plan 2016 for 2036.

Tables 5 and 6 below present a comparison between The London Plan 2016 apportionment targets at 2021 and 2036 against the Draft London Plan apportionment targets at 2021 and 2041. This comparison provides an indication as to whether the apportionment target has increased or decreased, by borough (the current London Plan apportionment target for 2036 has been compared against the Draft London Plan apportionment target for 2041).

current LP	Bromley	Bexley	City	Lewisham	Royal Greenwich	Southwark	southeast totals
<b>2021</b>	199,000	364,000	100,000	166,000	265,000	199,000	1,293,000
<b>2036</b>	247,000	453,000	100,000	206,000	329,000	247,000	1,582,000

Table 8: Apportionment targets for the Waste Planning Group members as per London Plan 2016

draft LP	Bromley	Bexley	City	Lewisham	Royal Greenwich	Southwark	southeast totals
<b>2021</b>	192,000	457,000	84,000	184,000	338,000	150,000	1,405,000
	↓	↑	↓	↑	↑	↓	↑
<b>2041</b>	204,000	485,000	90,000	195,000	359,000	159,000	1,492,000
	↓	↑	↓	↓	↑	↓	↓



**Table 9: Apportionment targets for the Waste Planning Group members as per draft new London Plan**

The following table presents the modelled capacity of each Waste Planning Group member (as per the methodology set out in para 1.29 and which forms the basis of this waste technical paper) against the 2021 and 2041 apportionment targets set out in the draft new London Plan.

draft new London Plan	2021	2036	2041
Bromley	95,240	109,288	Assumed as per capacity at 2036
Bexley	1,224,297	1,224,297	
City of London	0	0	
Lewisham	502,623	503,152	
Royal Greenwich	99,072	105,893	
Southwark	106,950	111,150	
<b>Total</b>	<b>2,028,182</b>	<b>2,053,780</b>	
<b>Combined draft new London Plan apportionment target</b>	<b>1,405,000</b>	<b>N/A</b>	<b>1,492,000</b>
<b>Collective projected total surplus</b>	623,182	N/A	561,780
<b>Projected surplus capacity from operational sites</b>	417,582	<b>N/A</b>	<b>365,180</b>

**Table 10: Modelled capacity of each Waste Planning Group member**

