

# Royal Borough of Kensington and Chelsea: Waste Data Study

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## Contents

<b>Executive Summary</b> .....	2
<b>1. Introduction</b> .....	4
<b>2. Policy Context</b> .....	4
<b>3. Public Consultation on the New Local Plan Review (NLPR)</b> .....	13
<b>4. Waste Arisings in Kensington and Chelsea</b> .....	16
<b>Local Authority Collected Waste</b> .....	16
<b>Commercial and Industrial Waste</b> .....	17
<b>Construction, Demolition and Excavation Waste</b> .....	17
<b>Hazardous waste</b> .....	19
<b>Other waste streams</b> .....	19
<b>5. Kensington and Chelsea’s waste need</b> .....	20
<b>LACW and C&amp;I waste need</b> .....	20
<b>CD&amp;E waste need</b> .....	20
<b>Hazardous waste</b> .....	22
<b>Other waste streams</b> .....	22
<b>6. Existing Sites and Capacity</b> .....	22
<b>7. Meeting Kensington and Chelsea’s Waste Management Need</b> .....	24
<b>8. Waste Exports</b> .....	26
<b>9. Conclusions and Recommendations</b> .....	31
<b>Appendix A: Exempt Waste Facilities in Kensington and Chelsea</b> .....	32
<b>Appendix B: Waste Exports Data</b> .....	36
<b>Appendix C: Glossary</b> .....	42

## Executive Summary

- I. This Waste Data Study has been prepared to support the Royal Borough of Kensington and Chelsea's New Local Plan Review.
- II. Kensington and Chelsea is required to plan for seven waste streams. The largest of these are Local Authority Collected Waste (LACW), Commercial & Industrial Waste (C&I) and Construction, Demolition and Excavation Waste (CD&E). The London Plan apportions an amount of LACW and C&I waste to each borough and Kensington and Chelsea is required to have regard to these apportionment targets when preparing its Local Plan. The London Plan does not apportion CD&E waste or any other waste streams.
- III. Kensington and Chelsea's waste management need over the plan period is set out in Table E1.

Table E1: Kensington and Chelsea's waste management needs 2021-2041

Waste stream	2021	2026	2031	2036	2041
Apportionment (LACW and C&I)	116,000	116,000	117,000	120,000	123,000
Construction & Demolition waste	49,108	49,108	49,108	49,108	49,108
Hazardous waste included in LACW, C&I and CD&E waste streams					
All other waste streams	0	0	0	0	0

- IV. Kensington and Chelsea has no operating licenced waste facilities and no new waste facilities are currently planned in the Borough. However, Cremorne Wharf is safeguarded for waste use and could deliver new waste management capacity within the Borough. Kensington and Chelsea also has a number of exempt sites which contribute to the management of waste. A summary of Kensington and Chelsea's existing waste management capacity and the gap between existing capacity and need is set out below.

Table E2: Existing and potential waste management capacity in Kensington and Chelsea

Source	LACW/C&I capacity	C&D capacity
Cremorne Wharf	23,400	-
Exempt waste sites	67,200	4,700
<b>Total Capacity</b>	<b>90,600</b>	<b>4,700</b>
Capacity Need by 2041	123,000	49,108
<b>Capacity Gap</b>	<b>32,400</b>	<b>44,408</b>

- V. Kensington and Chelsea does not have any Strategic Industrial Locations or Locally Significant Industrial Sites for new waste facilities. A call for sites was carried out in September 2020 as part of the Issues Consultation and in July 2021 as part of the Issues and Options consultation. The two call for sites identified no sites in the Borough for new waste facilities which are suitable or deliverable.

- VI. In order to meet its waste need and meet London Plan requirements, Kensington and Chelsea will need to reach an agreement with another London Borough(s) to assist meeting its apportionment target.
  
- VII. It is important to demonstrate that Kensington and Chelsea's waste can continue to be exported throughout the plan period and this will be done through the Duty to Co-operate and Statements of Common Ground, where required.

## 1. Introduction

- 1.1 The Royal Borough of Kensington and Chelsea (RBKC) is updating the Local Plan adopted in September 2019. In 2020, the Council started a New Local Plan Review (NLPR) and consulted on an Issues document September-November 2020 and an Issues and Options document July-October 2021.
- 1.2 Kensington and Chelsea is required to plan for seven waste streams<sup>1</sup>. The largest of these are Local Authority Collected Waste (LACW), Commercial & Industrial Waste (C&I) and Construction, Demolition and Excavation Waste (CD&E). The London Plan apportions an amount of LACW and C&I waste to each borough and Kensington and Chelsea is required to have regard to these apportionment targets when preparing Local Plans. The London Plan does not apportion CD&E waste or any other waste streams.
- 1.3 This Waste Data Study has been prepared to inform Kensington and Chelsea's NLPR. In line with national policy, this evidence base looks at Kensington and Chelsea's need for all seven waste streams, including waste apportioned by the London Plan. It looks at the current waste management picture in the Borough, where and how Kensington and Chelsea's waste is being managed.
- 1.4 This evidence base identifies Kensington and Chelsea's waste need by identifying how much waste is expected to be generated over the plan period and the amount of existing capacity within the Borough. It also identifies where the Borough's waste is exported to.

## 2. Policy Context

- 2.1 This Waste Evidence Base and waste policies in the New Local Plan Review (NLPR) need to comply with national, regional and local policies. These are set out below.

### Localism Act

- 2.2 The Localism Act 2011<sup>2</sup> gave the responsibility for strategic planning back to local authorities acting individually. London is an exception to this and the Mayor has a responsibility for strategic planning through the London Plan, however waste planning is still the responsibility of individual Boroughs and Mayoral Development Corporations.
- 2.3 Section 110 of the Localism Act prescribes the "Duty to Co-operate" between local authorities in order to ensure that they work together on strategic issues such as waste planning. The duty is "to engage constructively, actively and on an on-going basis" and must "maximise the effectiveness" of all authorities concerned with plan-making. For matters such as waste planning, it is therefore important that local authorities can show

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<sup>1</sup> The seven waste streams are set out in the [Planning Practice Guidance - Waste](#) paragraph 013

<sup>2</sup> <https://www.legislation.gov.uk/ukpga/2011/20/contents/enacted>

that they have worked together in exchanging information and reaching agreement on where waste management facilities will be built.

2.4 Waste is a strategic cross-boundary issue and is subject to the duty to co-operate. RBKC will therefore need to engage with waste planning authorities who receive strategic amounts of waste exported from the Borough to establish if there are any planning reasons why this cannot continue.

### Environment Act

2.5 The Environment Act 2021<sup>3</sup> aims to enable transition to a more circular economy, incentivise greater recycling, encourage businesses to create sustainable packaging and mandate the collection and recycling of certain materials including food and garden waste. Most of the details will come forward through secondary legislation expected in 2022.

### Resources and Waste Strategy

2.6 The Government's "Resources and Waste Strategy for England"<sup>4</sup> was published in December 2018, building on the recent "A Green Future: Our 25 Year Plan to Improve the Environment"<sup>5</sup> (January 2018). The overall strategy is to reduce the amount of waste produced, promote resource efficiency and move towards a circular economy.

2.7 There are a number of policy areas that could affect the amount and type of waste that local authorities have to plan for in the future. For example, producers paying for the disposal of their own packaging, a tax on plastic packaging which does not include recycled content, deposit return schemes, streamlined recycling and food waste collection services, and greater efficiency of energy recovery facilities. The strategy is a 25 year plan and the government has started consulting on some of these measures. However, it remains to be seen how these measures will impact on waste planning authorities.

2.8 The Resources and Waste Strategy commits to reviewing the Waste Management Plan for England, National Planning Policy for Waste<sup>6</sup> (NPPW) and the accompanying Planning Practice Guidance<sup>7</sup> (PPG) in 2019 to align national policies with the Resources and Waste Strategy. However, this work has not yet started and no new timetable has been published.

2.9 The Resources and Waste Strategy acknowledges the deficiency in data on waste and commits to develop a new approach to collecting waste data, including a move away

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<sup>3</sup> <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

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

<sup>5</sup> <https://www.gov.uk/government/publications/25-year-environment-plan>

<sup>6</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/364759/141015\\_National\\_Planning\\_Policy\\_for\\_Waste.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

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

from weight-based targets towards impact-based targets. The timetable for this review is not yet known.

### Waste Management Plan for England

2.10 The Waste Management Plan for England (2021)<sup>8</sup> (WMPE) is an analysis of the current waste management situation in England. The plan does not introduce new policies but brings current waste management policies together under one national plan.

2.11 The WMPE includes a section on waste planning. It states that waste planning authorities are responsible for producing waste plans to support the objectives of the Waste Management Plan for England. It notes the government's recent consultation on major reforms to the planning system and, if taken forward, resultant changes to the National Planning Policy Framework (NPPF) and National Planning Policy for Waste (NPPW).

### National Planning Policy Framework

2.12 The National Planning Policy Framework (NPPF) was revised in 2021 and an update to the plan-making section of the Planning Practice Guidance (PPG) was made at the same time.

2.13 National planning policy for waste is dealt with in a separate document, but the NPPF sets out policies for plan-making which will influence the development of waste policies in the Local Plan. Paragraph 31 states that "the preparation and review of all policies should be underpinned by relevant and up-to-date evidence" which should be "adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals." Paragraph 35 sets out the criteria against which Local Plans will be examined. These include:

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

2.14 This waste evidence base focuses on meeting these requirements, including identifying RBKC's objectively assessed waste management needs (positively prepared), identifying an appropriate strategy for RBKC's waste (justified), identifying strategic waste exports

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<sup>8</sup> <https://www.gov.uk/government/publications/waste-management-plan-for-england-2021>

from RBKC's (effective) and ensuring conformity with waste policies (consistent with national policy).

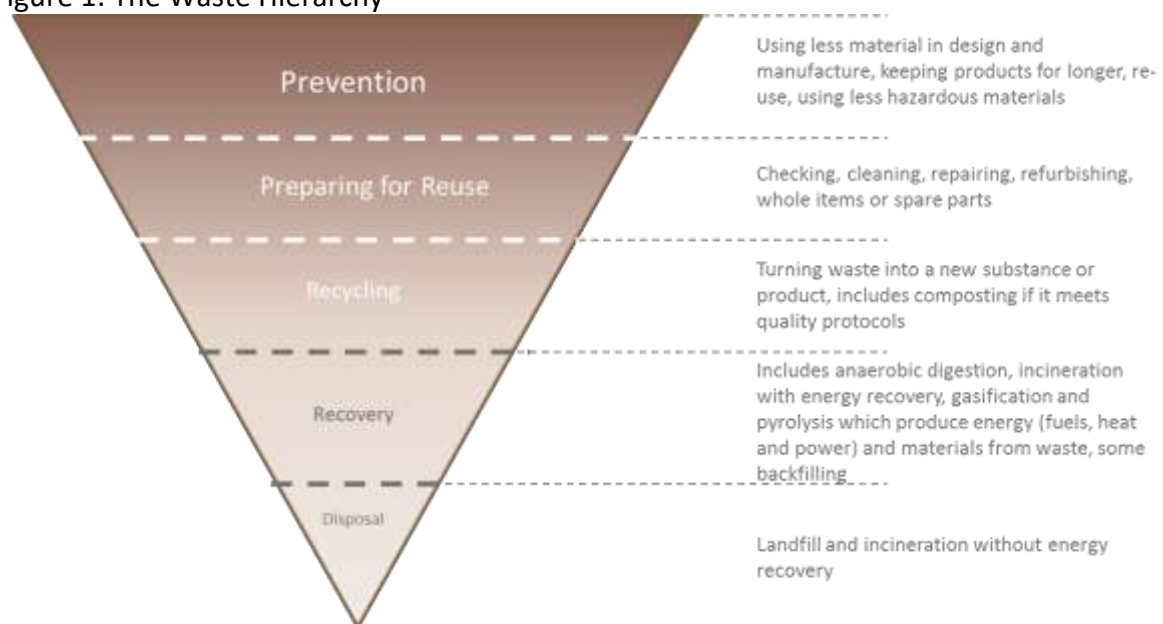
2.15 The main policy requirement affecting waste in the NPPF and PPG is the requirement for planning authorities to produce statements of common ground to provide evidence of progress made through the duty to co-operate. Waste is a cross-border strategic issue that will need to be addressed in statements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

### National Planning Policy for waste

2.16 The National Planning Policy for Waste<sup>9</sup> (NPPW), published in 2014, sets out the Government's waste planning policies which all local planning authorities must have regard to when developing local waste plans. The NPPW is supplemented by the Planning Practice Guidance<sup>10</sup> (PPG) section on waste which provides further detail on how to implement the policies.

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

Figure 1: The Waste Hierarchy



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

<sup>10</sup> <https://www.gov.uk/guidance/waste>



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

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

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

2.20 This data study includes all these elements.

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

- Local Authority Collected Waste (LACW)<sup>11</sup> (apportioned by the London Plan)
- Commercial & Industrial waste (C&I)<sup>12</sup> (apportioned by the London Plan)
- Construction, Demolition & Excavation (CD&E)
- Low Level Radioactive waste (LLRW)
- Agricultural waste
- Hazardous waste
- Waste water

2.22 This report sets out existing capacity and discusses the requirements for each waste stream.

2.23 The NPPW requires Local Plans to identify sufficient opportunities to meet the identified needs of their area for the management of waste streams. The London Plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the Plan. The London Plan requires boroughs to provide capacity through facilitating the maximum use of existing facilities. Both the NPPW and London Plan direct new waste facilities towards industrial locations. Section 7 of this report looks at land for new waste facilities in Kensington and Chelsea.

### National Planning Policy Statements

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<sup>11</sup> Local Authority Collected Waste (LACW) comprises household waste and other waste collected by the council, such as street sweepings and municipal bins. This waste stream has historically been called 'Municipal' waste.

<sup>12</sup> Also known as business waste

2.24 National Planning Policy Statements (NPS) comprise the Government’s objectives for the development of nationally significant infrastructure in a particular sector and include any other policies or circumstances that ministers consider should be taken into account in decisions on infrastructure development. There are three relevant NPSs for waste: NPS for Renewable Energy (2011)<sup>13</sup>, NPS for Hazardous Waste (2013)<sup>14</sup> and NPS for Waste Water (2012)<sup>15</sup>. The government are currently consulting on a new NPS for Energy (2021)<sup>16</sup>. There are no known plans to deliver a nationally significant facility for waste to energy, hazardous waste or waste water in RBKC.

### London Environment Strategy

2.25 The Mayor’s Environment Strategy<sup>17</sup> was published in May 2018. It contains ambitious targets for waste, including a new London-wide recycling target of 65% municipal (household and business) waste by 2030. This is an ambitious target for RBKC and the barriers to increasing household recycling rates in inner London Boroughs are well known, for example the high proportion of flatted developments and low number of gardens. There is an expectation on RBKC, in its role as a waste collection and disposal authority, to produce a waste strategy setting out how it will make a meaningful contribution to meeting the Mayor’s municipal waste targets set out in the Environment Strategy.

2.26 It is more difficult for RBKC to directly influence business recycling rates and therefore partnership working with ReLondon (previously known as London Waste and Recycling Board) will be key to increasing business waste recycling. ReLondon is a partnership of the Mayor of London and the London Boroughs to improve waste and resource management. While most of this work is with boroughs in their capacity as waste collection authorities, and therefore outside the remit of the Local Plan, a key element of increasing municipal waste recycling is to ensure there is sufficient space for the separation and storage of recyclables for collection which is a planning issue.

2.27 The Mayor wants London to be a “zero waste city” which means no biodegradable or recyclable waste to landfill by 2026. The WDI does not report any of RBKC’s LACW/C&I waste going direct to landfill. It is possible that some of the waste exported to transfer stations is then removed to a landfill site, but it is not possible to say for certain.

### London Plan

2.28 RBKC’s New Local Plan Review and waste policy will need to be in general conformity with the London Plan (March 2021).

2.29 The London Plan states that London should manage as much of its waste within its boundaries as practicable, aiming to achieve waste net self-sufficiency by 2026 in all

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<sup>13</sup> [1940-nps-renewable-energy-en3.pdf \(publishing.service.gov.uk\)](#)

<sup>14</sup> [Hazardous waste national policy statement - GOV.UK \(www.gov.uk\)](#)

<sup>15</sup> [National policy statement for waste water - GOV.UK \(www.gov.uk\)](#)

<sup>16</sup> [Planning for new energy infrastructure: review of energy National Policy Statements - GOV.UK \(www.gov.uk\)](#)

<sup>17</sup> [London Environment Strategy | London City Hall](#)

waste streams except for excavation waste. To meet this aim, the plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the plan and to plan for those waste streams not apportioned by the London Plan.

2.30 The London Plan sets out both waste arising forecasts and apportionment targets for each London Borough. The apportionment targets for RBKC are lower than the borough’s projected arisings, reflecting the lack of existing waste management capacity and suitable land for new facilities. London Plan arisings and forecasts for RBKC is set out below in Table 2.1.

Table 2.1: Kensington and Chelsea LACW/C&I arisings and apportionment targets (tonnes)

	2021	2041
Arisings	201,000	210,000
Apportionment target	116,000	123,000

Source: London Plan (March 2021)

2.31 The London Plan incorporates targets set out in the Mayor’s Environment Strategy, including London-wide target of 65% municipal (household and business) waste by 2030. It also has targets of 95% reuse/recycling/recovery of construction and demolition waste (C&D) and 95% of excavation waste should be used for beneficial use.

2.32 The London Plan introduces a new requirement for referable applications<sup>18</sup> to include a “Circular Economy Statement” to set out how much waste the proposed development is expected to generate and where it will be managed. This will assist Kensington and Chelsea in monitoring these targets. Circular Economy Statement Guidance has been subject to consultation and is due to be published in 2022. The London Plan supports boroughs who adopt lower thresholds for Circular Economy Statements in their Local Plans.

2.33 Boroughs are required to “allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste”. This is in line with the NPPW which requires waste planning authorities to “identify sites and/or areas for new or enhanced waste management facilities”. The London Plan identifies existing facilities, Strategic Industrial Locations, Locally Significant Industrial Sites and safeguarded wharves as suitable for new waste facilities.

2.34 The London Plan makes clear that all existing waste sites should be safeguarded and retained in waste use. Existing waste sites are defined as those with planning permission for waste use or those with an Environment Agency permit.

2.35 The London Plan requires compensatory capacity elsewhere in London if a waste site is redeveloped for another use. Compensatory capacity must be at or above the same

<sup>18</sup> Referable applications include those for developments providing 150 residential units, other types of development of 20,000sq.m in central London or 15,000sq.m outside Central London, developments 25m high adjacent to the Thames or 30m high elsewhere in London.

level of the waste hierarchy of that which is lost, and that any loss of hazardous waste capacity must be replaced with hazardous waste capacity. Waste sites can only be released without re-providing capacity if it can be demonstrated that there is sufficient capacity elsewhere in London and the target of achieving net self-sufficiency is not compromised.

2.36 The London Plan supporting text suggests that boroughs with surplus capacity to share this with boroughs facing a shortfall in capacity before considering site release. The London Plan also acknowledges that it may not always be possible for boroughs to meet their apportionment within their boundaries and in these circumstances boroughs will need to agree the 'transfer of apportioned waste'. However, no further detail is provided on this.

2.37 Only capacity which "manages" waste can be counted towards RBKC's existing capacity. The London Plan states that waste is deemed to be managed if the following activities take place

- waste is used for energy recovery
- the production of solid recovered fuel (SRF), or it is high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition<sup>19</sup> as a minimum which is destined for energy recovery
- it is sorted or bulked for re-use (including repair and re-manufacture) or for recycling (including anaerobic digestion)
- It is reused, or recycled (including anaerobic digestion)

2.38 This Waste Data Study uses this definition to assess the existing capacity in RBKC.

2.39 London Plan Policy D6 'Housing quality and standards' part E and Policy S17 'Reducing waste and supporting the circular economy' part A6 requires housing to be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) food waste as well as residual waste.

#### Local Policies and Supporting Documents

2.40 Kensington and Chelsea adopted its Local Plan Partial Review (LPPR) Publication Policies in September 2019. The LPPR includes Policy CE3 on waste which commits the council to working with the GLA and other London Boroughs to meet its waste need. The policy safeguards Cremorne Wharf for waste use and encourages small-scale waste management facilities as part of developments, where practicable. The policy also requires Site Waste Management Plans for CD&E waste and all new developments to include well-designed refuse and recycling storage space.

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<sup>19</sup> The full Defra definition is: Refuse derived fuel (RDF) consists of residual waste that is subject to a contract with an end-user for use as a fuel in an energy from waste facility. The contract must include the end-user's technical specifications relating as a minimum to the calorific value, the moisture content, the form and quantity of the RDF.

- 2.41 Kensington and Chelsea began a review of the Local Plan in 2020 and published an Issues document for consultation in September 2020. The Issues documents includes waste at Issue 7 with a focus on requiring circular economy statements for major developments. Respondents to the Issues paper said that bin storage and recycling space in development is important and that Cremorne Wharf should continue to be safeguarded.
- 2.42 An Issues and Options document was subsequently prepared for consultation in July-October 2021. Waste policy options included continuing to safeguard Cremorne Wharf for waste uses, provide a meanwhile open space use at Cremorne Wharf and engaging with other London Boroughs to secure spare apportionment capacity. Representations on the Issues and Options document related to strategic waste issues are set out in section 3 of this Report.
- 2.43 A call for sites was undertaken during both the Issues consultation and Issues and Options consultation but no sites came forward for waste management use.

### 3. Public Consultation on the New Local Plan Review (NLPR)

3.1 Table 3.1 sets out representations on the NLPR Issues and Options document related to strategic waste issues. The comments will be taken into account when developing the NLPR waste policy.

Table 3.1: Representations on Strategic Waste Issues

Representor	Comments
GLA	The draft Plan reflects the boroughs waste apportionment target to manage 123,000 tonnes of waste in the borough by 2041 and this is welcome.
GLA	The intention to continue to safeguard Cremorne Wharf for waste use is welcomed and is consistent with Part B4C of Policy SI 8 of the LP2021. In addition, it is clear in Table 3.1 of the Mayor’s Safeguarded Wharves Review 2018-2019 that Cremorne Wharf is to be retained. It is noted that paragraph 12.7 of the draft Plan also sets out RBKC’s ambition to provide an open space at Cremorne Wharf, but as the borough is not able to demonstrate that it can meet its waste apportionment targets, or that it can manage its waste within the borough, waste uses should be prioritised on this site above others. It is noted that the site is currently vacant and RBKC should be actively promoting the site to deliver waste uses so that it is able to contribute towards meeting the borough’s waste apportionment target in accordance with Policy SI 8 of the LP2021.
GLA	If RBKC is not able to meet its waste needs, it should be made clear how the issue is being dealt with now and what plans there are for dealing with it in the future.
GLA	It is understood that RBKC is part of the Western Riverside Waste Authority (WRWA), and more detail regarding how the borough’s waste arisings are being managed by the WRWA would be useful and what the nature of that agreement is.
GLA	It would also be useful to learn how RBKC are working/collaborating with other London boroughs and waste planning sub-regional groups to find ways of dealing with borough waste arisings. Some London joint waste plans are being reviewed at this time and that may provide an opportunity for RBKC to investigate if any have surplus capacity to help meet the borough’s apportionment targets. The current draft Plan contains very little detail on this matter and there appears to be little in the way of evidence. We would therefore expect future drafts of the Plan to provide much greater detail and supported by evidence. The Mayor has set a target that London is to be self-sufficient in the management of its waste by 2026 as set out in

Representor	Comments
	<p>Policy SI 8 and RBKC are advised to do as much as it can to ensure that London is able to meet this target.</p> <p>It is not clear how RBKC would deal with future proposals for waste uses in the borough over the Plan period and this should also be addressed. In doing so, RBKC should follow the guidance set out in Policy SI 8 of the LP2021.</p>
Port of London Authority	<p>As part of the whole life cycle of development, the PLA considers that the promotion and use of the boroughs only Safeguarded Wharf at Cremorne Wharf for waterborne freight must continue to be supported, particularly with regard to promoting the use of the river for freight transport and this must be highlighted as part of the new Local Plan.</p> <p>As highlighted in the PLA's response provided as part of the November 2020 Issues consultation, Cremorne Wharf is safeguarded by 2021 Ministerial Safeguarding Directions for water-borne freight cargo handling and is supported by London Plan (2021) policy SI15 (Water Transport) which states that safeguarded wharves should only be used for waterborne freight-handling use. Therefore it must be made clear in the Local Plan including the waste policy and within an amended waterways policy that the borough will continue to safeguard Cremorne Wharf and actively promote its reactivation and use for water-borne freight transport, in line with the Safeguarding Directions and London Plan. Therefore the PLA would support option 1 of issue 7 for the borough to continue to safeguard Cremorne Wharf for waste management, water transport and cargo handling purposes.</p> <p>With regard to option 2 to provide a meanwhile open space (park with ancillary sporting use) at Cremorne Wharf. Policy SI15 and supporting paragraph 9.15.9 of the London Plan does state that appropriate temporary uses on vacant safeguarded wharves may be acceptable, but these must maintain the existing freight-handling infrastructure to a specified standard and be limited by a temporary permission with a specific end date, and should not be permitted where a permanent water borne freight-handling use is available. The PLA therefore does not object in principle to a meanwhile use at Cremorne Wharf, but consider that this must be supported by a commitment to ensure that the reactivation of the wharf for water-freight cargo handling uses is actively pursued and that the meanwhile use has a specific end date to make clear that such a use would be temporary. With regard to waste apportionment and the current designation of Cremorne Wharf as a waste site within the borough, to confirm the removal of the site as a safeguarded waste site would not affect its status as a safeguarded wharf.</p>

Representor	Comments
Thames Water (Savills)	<p>Option 1 Option 1 states: Continue to safeguard Cremorne Wharf for waste management, water transport and cargo handling purposes. Cremorne wharf is the only future opportunity for additional waste management capacity to contribute to meeting the London Plan waste apportionment target. The wharf is safeguarded and protected by the Safeguarded Wharves Direction (March 2021). This approach is in accordance with London Plan and Safeguarded Wharves Direction. The site will contribute to help reduce the Borough's waste apportionment gap. Areas within the site will be retained by Thames Water as operational land for access and operation and maintenance throughout the lifetime of the infrastructure. This land will continue to be subject to the safeguarding included in the Article 52 of the DCO. Whilst we recognise this future aspiration for the site, it should not jeopardise the operation and maintenance of the Thames Tideway Tunnel infrastructure on-site as approved by the Thames Tideway Tunnel DCO in 2014. Nor should it impact the sites designation as a safeguarded wharf, as protected by London Plan Policy SI15 and the Safeguarded Wharves Direction (March 2021).</p> <p>Option 2 Option 2 states: Provide a meanwhile open space (park with ancillary sporting use) at Cremorne Wharf This would enable the site to be used for much needed open space but released for waste if needed in the future. The site would be put to good use rather than lying vacant Areas within the site will be retained by Thames Water as operational land for access and operation and maintenance throughout the lifetime of the infrastructure. This land will continue to be subject to the safeguarding included in the Article 52 of the DCO. Whilst we recognise this temporary aspiration for the site, it should not jeopardise the operation and maintenance of the Thames Tideway Tunnel infrastructure on-site as approved by the Thames Tideway Tunnel DCO in 2014. Nor should it impact the sites designation as a safeguarded wharf, as protected by London Plan Policy SI15 and the Safeguarded Wharves Direction (March 2021).</p>
LB Hammersmith and Fulham	The Hammersmith and Fulham waste apportionment has been protected through sites in the OPDC area. There is therefore a surplus in capacity in the borough going forward. The Council



Representor	Comments
	welcomes further discussions on this issue through the Duty to Cooperate process alongside the OPDC. LBHF will continue to work together with authorities within the Western Riverside Waste Authority (WRWA) area, manage waste sustainably and effectively.
Environment Agency	London Plan (2021) aims for net waste self-sufficiency for waste in London. If applicable, we suggest the inclusion of the London Plan Policy S18 Waste Capacity and Net Waste Self- sufficiency, in reference to enclosure of waste sites. Point E, criteria 4) the impact on amenity in surrounding areas (including but not limited to noise, odours, air quality and visual impact) – where a (waste) site is likely to produce significant air quality, dust or noise impacts, it should be fully enclosed.

## 4. Waste Arisings in Kensington and Chelsea

4.1 Kensington and Chelsea is required to plan for the waste management needs of the Borough, contributing towards the target of net self-sufficiency in London by 2026. There are seven waste streams, which includes waste from households, businesses and construction. Waste arisings vary from year to year.

### Local Authority Collected Waste

4.2 Kensington and Chelsea is one of four London Boroughs (along with Wandsworth, Hammersmith & Fulham and Lambeth) for which the Western Riverside Waste Authority (WRWA) is the statutory waste disposal authority for household waste. A thirty year Waste Management Service Agreement (WMSA) was established between WRWA and Cory Environmental Ltd to dispose of WRWA waste, commencing in October 2002 and ending in 2032.

4.3 In 2020/21 Kensington and Chelsea produced 62,550 tonnes of local authority collected waste (LACW)<sup>20</sup>. This continues a decline in LACW arisings over the previous six years, although the amount of waste generated may have been affected by Covid-19. The total was made up of around 48,000 tonnes from households and 14,500 tonnes of ‘trade’ waste collected by the council from locations such as household recycling centres, street sweepings, gully emptyings, public bins, and civic buildings.

4.4 Kensington and Chelsea exports all of its LACW. Mixed recyclables are taken to the Materials Recycling Facility in Wandsworth to be sorted before their onward journey to be reprocessed into new products. Segregated recyclate goes on to facilities in Barking & Dagenham, Norfolk, Lincolnshire, Yorkshire and Europe. 22.7% of RBKC’s Local

<sup>20</sup> Source: [ENV18 - Local authority collected waste generation from April 2000 to March 2021 \(England and regions\) and local authority data April 2020 to March 2021](#)

Authority Collected Waste was recycled in 2020/21. Kensington and Chelsea have agreed a [Reduction and Recycling Plan](#) to increase the amount of LACW recycling in the Borough and help to achieve the Mayor's London-wide targets of 50% recycling of LACW by 2025<sup>21</sup>.

4.5 Residual ("black bag") waste is taken to Cringle Dock and Smuggler's Way Transfer Stations in Wandsworth and then transported down river to the Belvedere energy recovery facility in the London Borough of Bexley.

## Commercial and Industrial Waste

4.6 Commercial and Industrial (C&I) waste arisings is notoriously difficult to calculate. The best available data for C&I waste arisings in Kensington and Chelsea is from the Waste Evidence Base prepared by SLR in 2017 for the London Plan<sup>22</sup>.

4.7 The London Plan waste evidence base uses the 2009 Survey methodology. The Report states:

*Defra 2009 survey was co-funded by the London Waste and Recycling Board (LWaRB). The Defra 2009 survey quantifies C&I arisings for each of London's commercial and industrial sectors, as well as providing estimates of the borough level contribution to the C&I total. As per findings of the previous review of C&I data undertaken for the [previous London Plan], it is concluded that Defra's 2009 C&I survey remains the most robust and fit for purpose source of baseline waste data for London Plan forecasts.*

4.8 This report estimates that Kensington and Chelsea generates around 143,000 tonnes of C&I waste per annum. It does not calculate how much of this is currently recycled.

4.9 For the purposes of waste planning in Kensington and Chelsea, it is not crucial to know how much C&I waste is generated because the London Plan apportionment target replaces 'need' for both C&I and LACW waste streams. The London Plan apportions London's LACW and C&I waste arisings to each London Borough based on the ability of each borough to provide waste management capacity. If every borough identifies enough capacity to meet their apportionment targets then London will be net self-sufficient for managing C&I and LACW. Kensington and Chelsea's apportionment target (123,000 tonnes by 2041) is below the estimated arisings but this is what Kensington and Chelsea is required to plan for, rather than the arisings.

## Construction, Demolition and Excavation Waste

4.10 The amount of Kensington and Chelsea's Construction, Demolition and Excavation (CD&E) waste varies from year to year<sup>23</sup> reflecting levels of development taking place

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<sup>21</sup> [London Environment Strategy](#) (May 2018)

<sup>22</sup> [London Plan Waste Forecasts and Apportionments: Task 1 – GLA Waste Arisings Model Critical Friend Review](#) (SLR, March 2017)

<sup>23</sup> Source: Waste Data Interrogator

across the Borough. As with C&I waste, estimating the amount of CD&E waste is difficult because it relies on waste carriers accurately recording the origin of the waste.

- 4.11 In order to estimate the amount of CD&E waste generated in RBKC, the Waste Data Interrogator was used to gather waste inputs<sup>24</sup> to permitted facilities. Usually, this methodology makes an adjustment to waste inputs to intermediate sites (eg transfer) within the same administrative area, but as all of RBKC's arisings are exported, this is not considered necessary.
- 4.12 As well as data for waste originating in RBKC, very large amounts of waste are recorded in the WDI as coming from 'Central London'. Although it is not possible to say how much 'Central London' waste arises in RBKC, it seems likely that at least some of it could be attributed to the Borough. Due to this difficulty with waste data CD&E waste arisings should be treated as a minimum.
- 4.13 CD&E waste with the origin of Kensington and Chelsea and managed at licenced facilities is set out in Table 4.1. Hazardous waste has not been separated from the total as the proportion is very small. The amount attributed to 'Central London' has also been included in Table 4.1 for information.

Table 4.1: CD&E waste managed through licenced facilities

Management Route	2016	2017	2018	2019	2020
<b>All C&amp;D (origin RBKC)</b>	<b>49,800</b>	<b>62,225</b>	<b>36,868</b>	<b>47,537</b>	<b>33,856</b>
Landfill	19	464	795	4,161	19
Metal Recycling	10	27	2	56	51
Transfer	18,231	19,474	15,000	12,554	7,618
Treatment	31,539	42,260	21,071	30,766	24,057
Mobile Plant	-	-	-	-	2,092
<b>All C&amp;D ('Central London')</b>	<b>94,832</b>	<b>17,660</b>	<b>23,510</b>	<b>45,018</b>	<b>4,242</b>
<b>All Excavation (origin RBKC)</b>	<b>64,063</b>	<b>116,420</b>	<b>126,659</b>	<b>108,662</b>	<b>34,241</b>
Landfill	34,833	98,680	94,070	75,698	28,734
Transfer	27,164	14,503	24,856	12,358	42
Treatment	2,066	1,509	6,628	20,606	5,465
On/In Land	-	-	1,105	-	-
<b>All Excavation ('Central London')</b>	<b>811,334</b>	<b>1,542,794</b>	<b>954,564</b>	<b>1,648,554</b>	<b>553,932</b>

Source: Waste Data Interrogator 2016-2020

- 4.14 Table 4.1 shows that CD&E waste arisings vary from year to year in line with how much construction is taking place. The drop off in 2020 probably represents the impact of Covid safety measures. It is not clear if RBKC is meeting the London Plan target of 95% recycling of C&D waste because a significant proportion is going to transfer stations outside the Borough before its onward journey and the evidence trail is subsequently lost. However, only a small proportion of C&D waste goes direct to landfill and around

<sup>24</sup> This data includes EWC Chapter 17 (Construction and Demolition Waste - EWC code 17 05 04 and C&D waste is the remainder). C&D waste also includes EWC codes 19 12 09 (minerals such as sand, stones) and 20 02 02 (soil and stones) but this proportion is very small.

60-70% is sent directly to recycling/recovery facilities each year. The London Plan also has a target of 95% beneficial use of excavation waste. The table shows a significant amount of excavation waste is going to landfill, and it is not clear if this waste is also being put to beneficial use such as restoration as this is difficult to measure.

- 4.15 It should be noted that, due to WDI origin categories like 'Central London', 'South London' and 'London', it is only possible to report and monitor information such as waste management routes, recycling rates and imports/exports on a London-wide basis. This is because a majority of waste is not recorded as originating from a particular Borough and therefore will not get included in Local Plan monitoring or Waste Data Studies.
- 4.16 In addition to licenced facilities, CD&E waste is managed at exempt facilities. Exempt facilities still need to register their operations with the Environment Agency but are not required to report their throughput, so assumptions are required to estimate their capacity. Kensington and Chelsea two exempt facilities which manage around 4,700 tonnes of CD&E waste annually. Further details of assumptions made are set out in Table 6.2.
- 4.17 With the exception of CD&E material which is recycled and reused on site, and the amount managed at exempt facilities, all of Kensington and Chelsea's CD&E waste is exported.

### Hazardous waste

- 4.18 Hazardous waste is a component part of the other waste streams. Arisings vary each year but a small amount of hazardous waste (2,800 tonnes) from Kensington and Chelsea was recorded as being managed at licenced facilities in 2019<sup>25</sup>. Hazardous waste arising in Kensington and Chelsea is exported to specialist facilities outside the Borough.

### Other waste streams

- 4.19 The latest data available for Low Level Radioactive Waste is the Pollution Inventory Dataset from 2013. A small amount of this waste arises in Kensington and Chelsea (around 2,826,700 MBq), mainly from institutions like hospitals and research and development facilities. All the waste identified as being generated in RBKC was reported as disposed of either to air or to waste water and therefore no additional capacity is needed to manage this waste stream.
- 4.20 There is no agricultural waste arising in Kensington and Chelsea, except that which arises and is managed within the Royal Parks estate. No additional capacity is needed to manage this waste stream.

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<sup>25</sup> Source: Hazardous Waste Data Interrogator 2014-2018 (hazardous waste recorded as arising in Kensington and Chelsea)

4.21 Kensington and Chelsea wastewater and sewage sludge is treated at the sewage treatment works in Beckton, in the London Borough of Newham. Thames Water are upgrading Beckton Sewage Treatment Works from spring 2020 to increase capacity to provide wastewater management for an increasing population. The upgrade is due to be completed in 2023/24 and will be sufficient to handle the expected increase in London’s population.

## 5. Kensington and Chelsea’s waste need

### LACW and C&I waste need

5.1 The London Plan sets out anticipated household and business waste arisings in each London Borough (Table 9.1). The London Plan apportions an amount of this waste arising across London to each borough based on a methodology set out in an evidence base report by SLR/LUC<sup>26</sup>. The draft apportionment targets for Kensington and Chelsea are lower than the waste expected to be generated by the Borough. The figures for 2026-2036 are not provided in the draft new London Plan or evidence base documents and have been estimated based on proportions of waste arisings<sup>27</sup>.

5.2 The NPPW states that “In London, waste planning authorities should have regard to their apportionments set out in the London Plan when preparing their plans”. The London Plan requires boroughs to “allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste”. Therefore Kensington and Chelsea needs to plan to meet the London Plan waste apportionment targets rather than waste arisings.

5.3 Kensington and Chelsea’s apportionment targets are:

Table 5.1: Kensington and Chelsea’s Apportionment Targets

Waste stream	Apportionment	2021	2026	2031	2036	2041
LACW and C&I	1.4%	116,000	116,000	117,000	120,000	123,000

Source: London Plan (December 2019)

### CD&E waste need

5.4 The London Plan seeks net self-sufficiency by 2026. Net self-sufficiency means managing the equivalent of 100% of London’s waste, and applies to all waste streams, with the exception of excavation waste. Excavation waste is excluded from London’s net self-sufficiency target because the particular characteristics of excavation waste make it difficult to recover. Therefore Kensington and Chelsea is seeking capacity to meet its

<sup>26</sup> [https://www.london.gov.uk/sites/default/files/Updating\\_the\\_apportionment\\_method\\_methodology\\_report\\_lowres.pdf](https://www.london.gov.uk/sites/default/files/Updating_the_apportionment_method_methodology_report_lowres.pdf)

<sup>27</sup> Apportionment targets in the London Plan are provided for 2021 and 2041 only. The figures for years 2026, 2031 and 2036 have been estimated using Kensington and Chelsea’s apportionment share of 1.4% of the overall waste arisings in London set out in Tables 2-2 and 3-3 of the [London Plan Waste Forecasts and Apportionments Task 1 – GLA Waste Arisings Model Critical Friend Review](#), SLR (March 2017)

C&D needs but not excavation waste arisings; however excavation waste arisings have been projected over the plan period to assist duty to co-operate discussions.

- 5.5 Kensington and Chelsea has two Opportunity Areas; Earls Court and Kensal Canalside. These are expected to deliver a combined total of around 4,450 new homes in years 6-15 of the NLPR.
- 5.6 The Earls Court development site straddles two boroughs; Kensington and Chelsea, and Hammersmith and Fulham, with 7.43ha within Kensington and Chelsea. The scheme is expected to deliver a minimum of 1,050 new homes and a minimum of 40,000 non-residential floorspace, of which a minimum 20,000 sq m is for offices or research and development as per Class E(g). The site has already been cleared and therefore no substantial new demolition waste arising is anticipated. Some construction and excavation waste is likely and the developer will be required to submit a Circular Economy Statement and Site Waste Management Plan as part of a full application to ensure that construction and excavation waste is managed in accordance with circular economy principles, recycling and beneficial use targets.
- 5.7 The Kensal Canalside site is the subject of a Supplementary Planning Document (SPD) which was adopted by the council in July 2021. The SPD requires a waste strategy for the construction phase of development. The site is 15.4ha and is expected to deliver a minimum of 3,500 new homes and A minimum of 10,000sq.m of commercial (Class E(g)) floor space. The developer will be required to submit a Circular Economy Statement and Site Waste Management Plan as part of a full application to ensure that CD&E waste is managed in accordance with circular economy principles, recycling and beneficial use targets.
- 5.8 The methodology for calculating C&D waste arisings is set out in paragraph 33 of the Planning Practice Guidance. It states that “Waste planning authorities should start from the basis that net arisings of construction and demolition waste will remain constant over time” and goes on to say that any significant planned regeneration or major infrastructure projects over the timescale of the Plan may be relevant.
- 5.9 Given that the Earl’s Court site has already been cleared and the CD&E waste resulting from this has already been counted in the previous years’ data, and the introduction of Circular Economy Statements which will help minimise the amount of CD&E waste arisings, it seems appropriate to start from the basis that net arisings of construction and demolition waste will remain of a similar nature over the plan period, in line with the NPPG guidance. Monitoring will help establish if actual CD&E arisings are in line with projections and a review of the approach to waste should take place if the forecasts significantly exceed the expected arisings.
- 5.10 CD&E arisings have not been ‘constant’ over recent years (see Table 4.1), so the baseline for projections is the average across 2016-2019, avoiding the lower than usual arisings in 2020.

Table 5.2: Average Kensington and Chelsea CD&E arisings from 2016-2019 projected over the Plan period

Waste stream	Baseline	2021	2026	2031	2036	2041
C&D	49,108	49,108	49,108	49,108	49,108	49,108
Excavation	103,951	103,951	103,951	103,951	103,951	103,951
<b>Total</b>	<b>153,059</b>	<b>153,059</b>	<b>153,059</b>	<b>153,059</b>	<b>153,059</b>	<b>153,059</b>

## Hazardous waste

5.11 All the waste streams include some hazardous waste. All hazardous waste arising in Kensington and Chelsea is exported to be treated at specialist facilities which have a wide catchment area. Due to their specialist nature, planning for hazardous waste facilities is a strategic (regional) issue and Kensington and Chelsea will co-operate with the Greater London Authority on this.

## Other waste streams

5.12 There is no identified need for new capacity for agricultural or low-level radioactive waste. Thames Water are planning to upgrade Beckton Sewage Treatment Works to increase waste water capacity.

## 6. Existing Sites and Capacity

6.1 Kensington and Chelsea has no operating licenced waste facilities. No new waste facilities are currently planned in the Borough. The Borough is extremely constrained with competition for existing sites, and resulting high land values, and with no designated industrial land. This limits the ability of the Borough to identify land suitable for new waste sites.

6.2 Cremorne Wharf is safeguarded for waste use, and as a wharf, and could deliver waste management capacity within the Borough. The site is currently being utilised on a temporary basis for development of the Thames Tideway Tunnel and part of the site will need to be permanently retained for ongoing maintenance access to the tunnel. The Secretary of State granted the Thames Tideway Tunnel Development Consent Order (DCO) in September 2014 which is programmed for completion in 2022. The DCO includes the construction and replacement of buildings and structures at Cremorne Wharf to replace those which have been demolished. The Counters Creek Project is also taking place on the Cremorne Wharf site and is expected to be completed by 2022.

6.3 When the Thames Tideway Tunnel and the Counters Creek projects are complete Cremorne Wharf will be brought back into waste use. The exact type of facility or waste streams are not known, but the site is 0.39ha which could provide around 23,400

tonnes of throughput per annum<sup>28</sup> to contribute towards meeting the Borough’s capacity gap. It should be noted that a temporary meanwhile use may be brought forward on the site but this will not prevent a waste use being developed at Cremorne Wharf in the future.

6.4 Kensington and Chelsea has a number of exempt sites which contribute to the management of waste in the Borough. Exempt sites are waste facilities not requiring Environment Agency permits to operate. Exempt waste facilities are ancillary to the main business operation. There is no requirement to report the amount of waste being managed at an exempt facility so an estimate needs to be made using the register of exempt facilities. The methodology for doing this is set out in Defra’s “New Methodology to Estimate Waste Generation by the Commercial and Industrial Sector in England”<sup>29</sup> published in 2014.

6.5 Exemptions are classified under a range of 57 descriptions categorised as U (use of waste), T (treatment of waste), D (disposal of waste) and S (storage of waste). For the purposes of this study, only exempt facilities which ‘manage’ waste rather than store it or dispose of it are of interest. It also excludes waste which is likely to be captured at a licensed facility once moved on.

6.6 A full list of exempt waste facilities in Kensington and Chelsea is set out in Appendix A. The list does not include storage or other facilities which do not manage any waste. A summary of Kensington and Chelsea’s assumed exemptions capacity for C&I and C&D waste is provided in Table 6.2 below.

Table 6.2: Assumed capacity at Kensington and Chelsea’s exempt sites

Exemption Code	Description	Number of exemptions	Assumed capacity for each exemption
T4	Preparatory treatments (baling, sorting, shredding etc	2	5,000 tpa
T6	Treatment of waste wood and waste plant matter by chipping, shredding, cutting or pulverising	19	2,000 tpa
T23	Aerobic composting and associated prior treatment	7	400 tpa
U11	Spreading waste on nonagricultural land to confer benefit	19	200 tpa
U12	Use of Mulch	21	600 tpa
<b>Total assumed C&amp;I waste capacity at exempt facilities</b>			<b>67,200</b>
U1	Use of Waste in Construction	2	600 tpa <sup>30</sup>
T5	Screening and blending of waste to produce an aggregate or a soil	2	1,750 tpa

<sup>28</sup> Based on an average throughput of 60,000 tonnes per hectare

<sup>29</sup> [http://randd.defra.gov.uk/Document.aspx?Document=12262\\_FinalProjectReport120814.pdf](http://randd.defra.gov.uk/Document.aspx?Document=12262_FinalProjectReport120814.pdf)

<sup>30</sup> Estimate based on analysis in Table 2.4 of [Review of the Factors Causing Waste Soil To Be Sent To Landfill; 2007 to 2011](#) (WRAP, 2013)



Exemption Code	Description	Number of exemptions	Assumed capacity for each exemption
<b>Total assumed C&amp;D waste capacity at exempt facilities</b>			<b>4,700</b>

6.7 Kensington and Chelsea’s total potential and exempt waste management capacity is summarised in the table below.

Table 6.3: Existing and potential waste management capacity in Kensington and Chelsea

Source	LACW/C&I capacity	C&D capacity
Cremorne Wharf	23,400	-
Exempt waste sites	67,200	4,700
<b>Total Capacity</b>	<b>90,600</b>	<b>4,700</b>
Capacity Need by 2041	123,000	49,108
<b>Capacity Gap</b>	<b>32,400</b>	<b>44,408</b>

## 7. Meeting Kensington and Chelsea’s Waste Management Need

7.1 There is a significant gap between existing waste management capacity in Kensington and Chelsea and the Borough’s need for capacity to manage waste generated in its area.

7.2 London Plan Policy SI8 requires boroughs to provide capacity by maximising existing waste sites, identifying Strategic Industrial Locations and Locally Significant Industrial Sites as suitable locations for new facilities, and safeguarding wharves with an existing or future potential for waste.

7.3 Kensington and Chelsea has no existing waste sites, one location suitable for a new waste facility, Cremorne Wharf, but no Strategic Industrial Locations or Locally Significant Industrial Sites for new facilities. A call for sites was carried out in 2020 and again in 2021 but no sites came forward for new waste facilities. No new waste facilities are known to be coming forward in Kensington and Chelsea. This means that Kensington and Chelsea has to plan on the basis that, unless a waste facility comes forward on a windfall site, the Borough will need to rely on waste facilities outside its administrative boundaries. Waste exports are examined in detail in section 8.

7.4 Kensington and Chelsea will also need to rely on other Boroughs to help meet its waste apportionment targets. Paragraph 9.8.7 of the London Plan acknowledges that “it may not always be possible for boroughs to meet their apportionment within their boundaries and in such circumstances boroughs will need to agree the transfer of apportioned waste”. Kensington and Chelsea will therefore need to work with the GLA and other London Boroughs to agree the transfer of apportioned waste.

- 7.5 Kensington and Chelsea form part of the Western Riverside Authority grouping which includes Hammersmith and Fulham, Lambeth and Wandsworth. The Old Oak Common and Park Royal Development Corporation (OPDC) covers part of Hammersmith and Fulham. Although OPDC does not have an apportionment target, it is a waste planning authority and is required by the London Plan to cooperate with its host Boroughs to meet identified waste needs. The five Western Riverside authorities prepared a joint waste technical paper in 2017 which looked at waste need collectively and for individual Boroughs. Given this waste planning relationship, it seems appropriate to seek spare capacity from the other Western Riverside Authorities in the first instance.
- 7.6 Lambeth and Wandsworth have recently published updated Waste Data Studies which shows both Boroughs have a capacity gap and therefore have no spare capacity to offer.
- 7.7 Hammersmith and Fulham’s adopted Local Plan refers to the joint Western Riverside Waste Technical Paper (WTP) and concludes that the Borough, including the area covered by OPDC, has a surplus capacity for LACW/C&I (apportioned) waste streams. Hammersmith and Fulham’s key waste management facilities lie within the OPDC area; Old Oak Sidings (Powerday) and European Metal Recycling (EMR).
- 7.8 OPDC’s Draft Local Plan is supported by a number of waste documents including the Western Riverside Waste Technical Paper (January 2017)<sup>31</sup> and a Waste Apportionment Study (June 2018)<sup>32</sup>. At the time of writing the most recent draft Local Plan is Post Submission Modified Draft Local Plan (May 2021)<sup>33</sup>. The Draft Local Plan states that the Powerday site (also called Old Oak Sidings site) is capable of meeting Hammersmith and Fulham’s waste apportionment targets for the London Plan period up to 2036, and if it was fully optimised this could generate surplus capacity.
- 7.9 OPDC’s Post Submission Modified Draft Local Plan also states (paragraph 4.38) *“There is potential for the Old Oak Sidings waste site to significantly increase its waste throughput capacity. The site is capable of meeting Hammersmith and Fulham’s waste apportionment targets for the London Plan period up to 2036, and if it was fully optimised this could generate surplus capacity. To help LBHF meet their waste apportionment targets, the Local Plan safeguards this site and OPDC will work closely with the site operator to explore ways it can be assisted to expand its markets in order to increase its use. The infrastructure improvements that may be required to support the wider industrial intensification of Old Oak North will help to support the ongoing and enhanced operation of the Old Oak Sidings site.”*
- 7.10 OPDC’s Waste Apportionment Study (2018) provides more detail about maximising the capacity of the Powerday site, stating at paragraph 3.17 *“OPDC’s Local Plan policies will create and increase the range of opportunities as they support development proposals which maximise the use of rail and water transport (P3, T7, T8) during the construction and operation of development.”*

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<sup>31</sup> [https://www.london.gov.uk/sites/default/files/59.waste\\_technical\\_paper\\_2018.pdf](https://www.london.gov.uk/sites/default/files/59.waste_technical_paper_2018.pdf)

<sup>32</sup> [https://www.london.gov.uk/sites/default/files/56.waste\\_apportionment\\_study\\_2018.pdf](https://www.london.gov.uk/sites/default/files/56.waste_apportionment_study_2018.pdf)

<sup>33</sup> [opdc-40a\\_opdc\\_post\\_submission\\_modified\\_draft\\_local\\_plan\\_may\\_2021\\_0.pdf](https://www.london.gov.uk/sites/default/files/opdc-40a_opdc_post_submission_modified_draft_local_plan_may_2021_0.pdf) (london.gov.uk)

7.11 Table 7.1 summarises the potential capacity available at Powerday as set out in OPDC’s Waste Apportionment Study and shows that it is sufficient to meet the capacity gap for Kensington and Chelsea’s LACW/C&I (apportioned) waste as well as Hammersmith and Fulham’s waste need. There is also surplus C&D capacity at Powerday to meet Kensington and Chelsea’s C&D waste need. Hammersmith and Fulham’s waste management need for LACW/C&I is taken from the London Plan apportionment target for 2041 and need for C&D has been projected forward from the 2036 CD&E figure in the Western Riverside Waste Technical Paper, although it is likely to be lower than this as excavation waste is not included in the calculation of ‘need’.

Table 7.1: LBHF capacity and need 2041

	LACW/C&I capacity	C&D capacity
LBHF Capacity at Powerday (Source: Waste Apportionment Study)	411,171	574,000
LBHF Need (Source: London Plan and Waste Technical Paper)	223,000	158,921
Spare capacity in LBHF (all sites)	188,171	415,079
RBKC Capacity Gap	32,400	44,408

## 8. Waste Exports

8.1 Kensington and Chelsea exports its waste to be managed because it has no licenced waste management facilities within the authority area. Local planning authorities have a duty to cooperate with each other on strategic matters that cross administrative boundaries. Exports of waste from one waste planning authority to another is a strategic cross-boundary matter and is an important consideration in assessing the effectiveness of the Local Plan. It is therefore important to understand the destination of Kensington and Chelsea’s waste exports.

8.2 This section looks at destinations of waste exports for a typical recent year (2019)<sup>34</sup> as well as strategic exports trends over the last five years. What constitutes a ‘strategic’ level of waste movement will vary between waste planning authorities, however the guideline levels set out below have been agreed in London, south east and east of England as a starting point for considering whether dialogue is required. These levels are for the total quantum of movement to an area rather than to a single site.

- Non-hazardous waste – more than **5,000 tonnes** per annum
- Hazardous waste - more than **100t** per annum
- Inert waste - more than **10,000t** inert per annum

8.3 The primary sources of data on waste exports is the Environment Agency’s Waste Data Interrogators (WDIs). The data sources include information about the amount of waste received at a particular site and the origin of that waste. The accuracy of this data is not

<sup>34</sup> 2019 is preferred to 2020 as waste arisings and patterns of exports in 2020 would have been affected by Covid and may be anomalous.

perfect and the limitations are well known, however these are the best available data sources for movements of waste and are used as the starting point for co-operation with other waste planning authorities receiving Kensington and Chelsea’s waste.

8.4 A specific example of the limitations of the WDI pertinent to Kensington and Chelsea is that the data for 2019 shows Cringle Dock waste transfer station in Wandsworth received 311,500 tonnes of waste but the origin is recorded as “London”. As mentioned above, all Kensington and Chelsea’s residual (“black bag”) waste goes to Cringle Dock and Smuggler’s Way transfer stations before its onward journey down the river to the Belvedere energy recovery facility in Bexley, so some of this waste must have come from Kensington and Chelsea. However, as the WDI doesn’t record the origin of waste received at Cringle Dock by local authority, it is not possible to accurately say how much Kensington and Chelsea exports to Wandsworth and eventually to Bexley using the WDI.

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

8.6 Table 8.1 summarises the type of waste recorded by the Waste Data Interrogator (WDI) and the Hazardous Waste Data Interrogator (HWDI) as being exported from Kensington and Chelsea in 2016-2020. 2020 can be seen to be an anomalous year for CD&E waste arisings due to Covid.

Table 8.1: Recorded exports from Kensington and Chelsea by waste type 2016-2020

Waste type	2016	2017	2018	2019	2020
LACW/C&I (WDI)	12,017	11,800	12,271	12,480	11,310
CDE (WDI)	113,863	178,645	163,527	156,199	68,097
Hazardous (WDI)	217	468	776	1,880	378
Hazardous (HWDI)	14,262	3,208	1,722	2,826	Not available

Source: Waste Data Interrogator 2016-2020 and Hazardous Waste Data Interrogator 2016-2019

8.7 It is clear from Table 8.1 that the LACW/C&I waste figures in the WDI are not an accurate account of the amount of waste generated in and exported from Kensington and Chelsea. As mentioned above, the WDI does not record how much of Kensington and Chelsea’s local authority collected waste exports go to Cringle Dock or Belvedere energy recovery facility. However, the government annual reports on local authority collected waste<sup>35</sup> (LACW) can be used to understand more about where this waste stream is managed. Table 8.2 shows how much LACW is recycled and how much is not recycled

<sup>35</sup> [Statistical data set ENV18 - Local authority collected waste: annual results tables](#)

over the past five years. 2020 can be seen to be an anomalous year for LACW waste arisings due to Covid.

Table 8.2: Kensington and Chelsea’s LACW management 2016/17-2020/21 (tonnes)

	2016/17	2017/18	2018/19	2019/20	2020/21
Recycling-composting-reuse	16,975	16,496	17,187	17,495	14,220
Not sent for recycling	62,282	61,717	61,593	60,206	48,327
Total	79,257	78,213	78,780	77,701	62,547

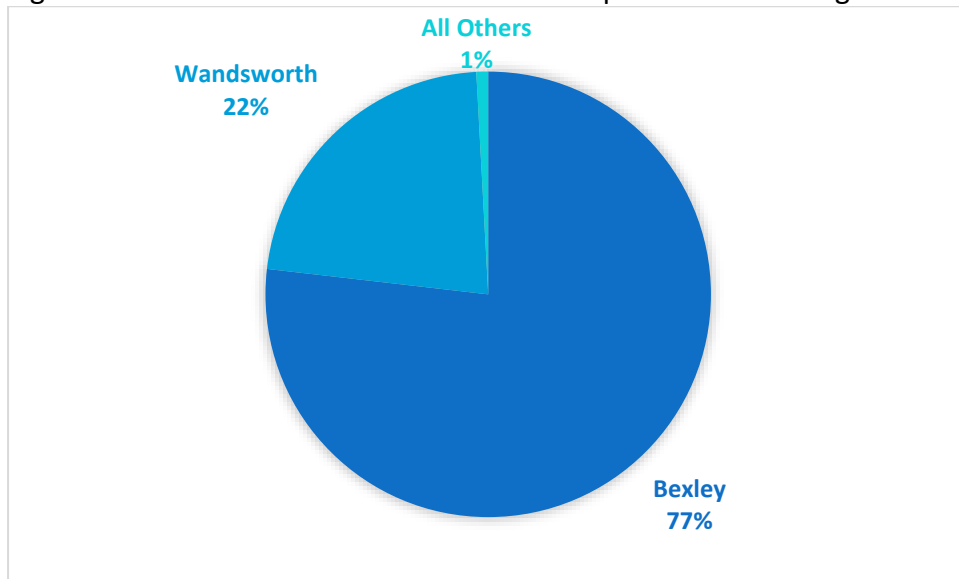
Source: [ENV18 - Local authority collected waste generation from April 2000 to March 2021 \(England and regions\) and local authority data April 2020 to March 2021](#) (Table 1)

8.8 As mentioned above, Kensington and Chelsea’s household waste is managed outside the Borough, with recyclables going to a Materials Recovery Facility (MRF) at Smugglers’ Wharf in Wandsworth and residual (“black bag”) waste transported down river to the Belvedere energy recovery facility in the London Borough of Bexley. It can therefore be assumed that the figures in Table 8.2 are approximately the amount of waste managed at each of these facilities. Therefore the tonnes of waste exported to Bexley (via Wandsworth can be added to the known information. The WDI already records the amount of Kensington and Chelsea’s LACW recyclable waste received at Smuggler’s Way MRF in Wandsworth.

8.9 However, Kensington and Chelsea’s commercial and industrial (C&I) waste is not reported in the WDI as originating in the Borough and is not recorded elsewhere. Kensington and Chelsea’s C&I waste may be captured in the WDI as originating in “London” or “Central London” but it is not possible to say how much of this waste arose in RBKC. Therefore, it is not possible to say where of Kensington and Chelsea’s commercial and industrial waste is exported to.

8.10 The Figure 2 shows the main destinations of Kensington and Chelsea’s LACW waste exports in 2019. See Appendix B for the data behind the graph.

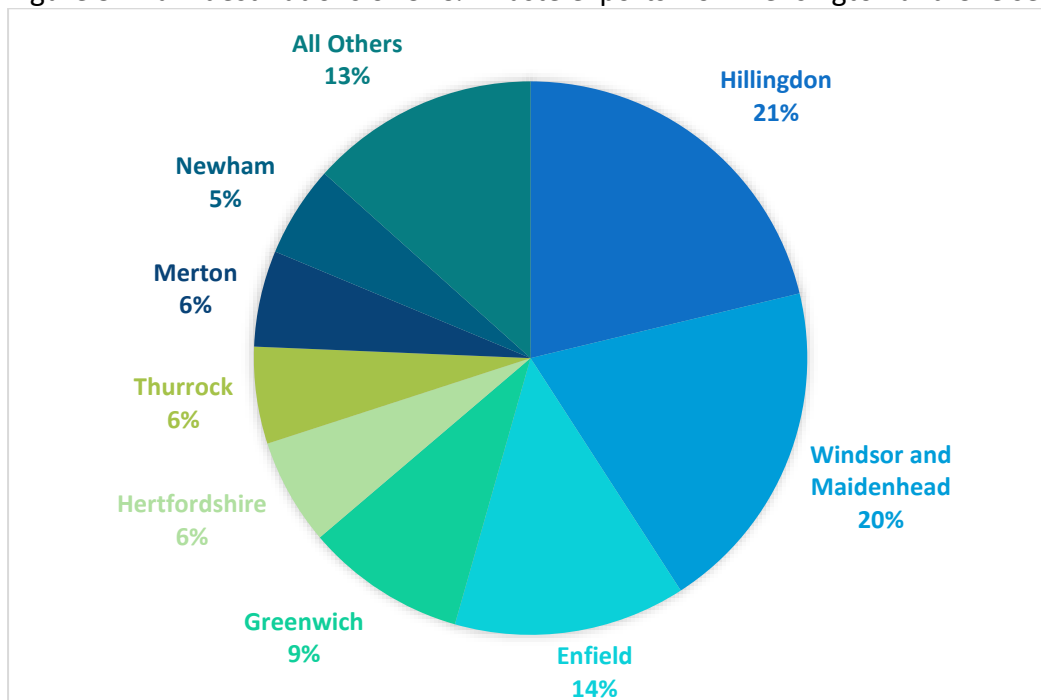
Figure 2: Main destinations of LACW waste exports from Kensington and Chelsea in 2019



Source: Waste Data Interrogator and Defra local authority data 2019

8.11 The main destinations for CD&E waste exports in 2019 is shown in Figure 3 below. About two-thirds of CD&E waste is managed within London, and one third outside of London. The majority of the CD&E waste exported outside of London is excavation waste going to landfill. See Appendix B for the data behind the graph.

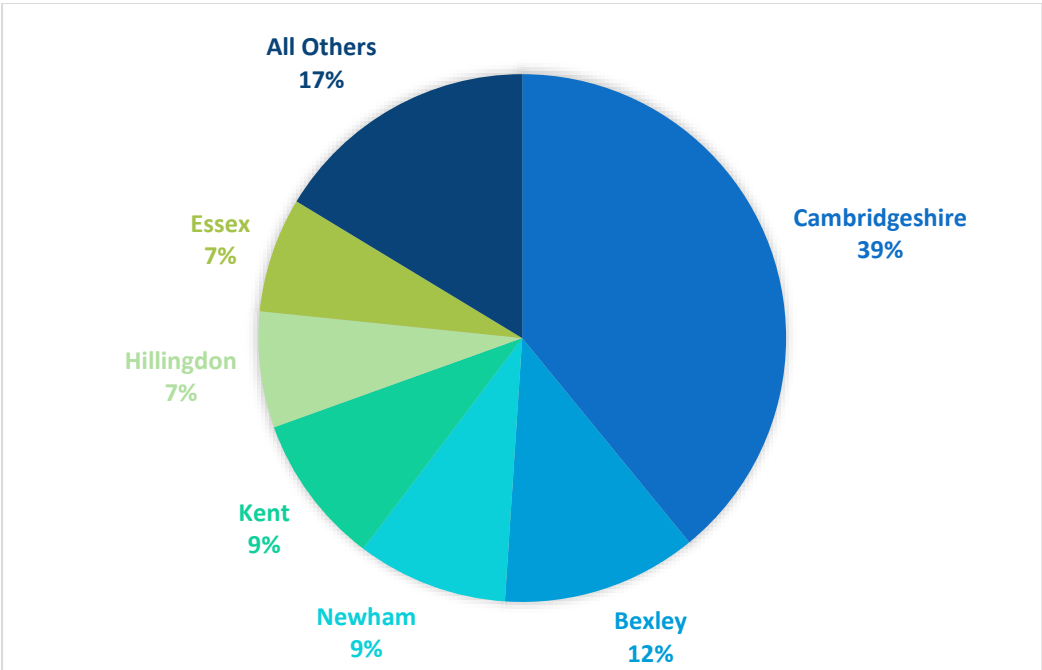
Figure 3: Main destinations of CD&E waste exports from Kensington and Chelsea in 2019



Source: Waste Data Interrogator 2019

8.12 There are two sources of data for hazardous waste exports. The Hazardous Waste Data Interrogator, which provides more accurate information on the amounts and type of waste but not the destination, and the Waste Data Interrogator which includes the destination facility, but is less accurate about the quantities of waste. About one third of hazardous waste is exported to facilities in London and two thirds to destinations outside London. Figure 4 below presents data from the HWDI but should be supplemented by information from the WDI for duty to co-operate engagement. See Appendix B for the data behind the graph.

Figure 4: Main destinations of hazardous waste exports from Kensington and Chelsea 2019



Source: Hazardous Waste Data Interrogator 2019

8.13 Full information on waste exports from Kensington and Chelsea over the last five years is set out in Appendix B. It should be noted that the 2020 Hazardous Waste Data Interrogator has not been published at the time of writing and the data for hazardous waste is therefore from 2015-2019.

**Waste Imports**

8.14 There are no waste imports to Kensington and Chelsea.

**Duty to Co-operate**

8.15 It is important to demonstrate that Kensington and Chelsea’s waste can continue to be exported throughout the plan period and this will be done through the Duty to Co-operate using the waste exports data in Appendix B as the basis for discussions.

- 8.16 The Duty to Co-operate requires Kensington and Chelsea “to engage, constructively, actively and on an on-going basis” with prescribed public bodies in the preparation of development plan documents “so far as relating to a strategic matter”. The National Planning Policy Framework (NPPF) includes infrastructure for waste management as one of the strategic policy areas.
- 8.17 Engagement with waste planning authorities who receive strategic amounts of waste from Kensington and Chelsea should begin as part of the Reg 18 consultation on the NLPR. Where recipient authorities raise issues related to the continuing export of waste from Kensington and Chelsea to their area, a statements of common ground may be needed to agree the position and demonstrate effective and on-going joint working on these matters.

## 9. Conclusions and Recommendations

- 9.1 Kensington and Chelsea is required to plan for seven waste streams. The largest of these are Local Authority Collected Waste (LACW), Commercial & Industrial Waste (C&I) and Construction, Demolition and Excavation Waste (CD&E). The London Plan apportions an amount of LACW and C&I waste to each borough and Kensington and Chelsea is required to have regard to these apportionment targets.
- 9.2 The NLPR should include a policy on waste which demonstrates how the Borough plans to meet its waste needs, including the waste apportionment target, and recycling/reuse targets.
- 9.3 The NLPR should continue to safeguarded Cremorne Wharf for waste use. The Local Plan should make clear that if Cremorne Wharf is developed for uses other than waste management on a permanent basis, this will only be supported where appropriate compensatory capacity is made, in line with London Plan policy SI9.
- 9.4 In order to demonstrate that it can meet its London Plan waste apportionment targets, Kensington and Chelsea will need to reach an agreement with another London Borough(s) to assist with its apportionment target. Kensington and Chelsea should work with the GLA to ensure that surplus capacity elsewhere in London, and in particular Hammersmith and Fulham / OPDC, is shared with Kensington and Chelsea to help meet its waste needs before considering site release.
- 9.5 It is important to demonstrate that Kensington and Chelsea’s waste can continue to be exported throughout the plan period and this will be done through the Duty to Co-operate and Statements of Common Ground, where required.
- 9.6 The NLPR policy should include a requirement for adequate and easily accessible storage space that supports the separate collection of dry recyclables, food waste and residual waste.



## Appendix A: Exempt Waste Facilities in Kensington and Chelsea

Registration number	Organisation name	Site Easting	Site Northing	Exemption code
WEX103455	Chelsea Physic Garden	527700	177781	T23
WEX103455	Chelsea Physic Garden	527700	177781	T6
WEX103455	Chelsea Physic Garden	527700	177781	U11
WEX103455	Chelsea Physic Garden	527700	177781	U12
WEX103796	idverde Ltd	524782	179594	T23
WEX103796	idverde Ltd	524782	179594	T6
WEX103796	idverde Ltd	524782	179594	U11
WEX103796	idverde Ltd	524782	179594	U12
WEX227205	JOHN F HUNT LIMITED	525137	179293	U1
WEX102112	Keltbray Ltd	528086	178622	T5
WEX125231	Keltbray Ltd	527781	179634	T5
WEX151607	Soils an Stone Ltd	528066	177823	U1
WEX142585	SUEZ Recycling and Recovery Uk Ltd	524547	181470	T4
WEX142581	SUEZ Recycling and Recovery UK Ltd	524983	178790	T4
WEX146235	The National Trust	527184	177719	T23
WEX146235	The National Trust	527184	177719	U12
WEX232519	The Royal Household	525824	180003	U12
WEX101700	The Wellcome Trust Ltd	526520	178182	T23
WEX101702	The Wellcome Trust Ltd	527606	179003	T23
WEX101703	The Wellcome Trust Ltd	526765	178478	T23

Registration number	Organisation name	Site Easting	Site Northing	Exemption code
WEX116137	Wellcome Trust	526856	178569	T23
WEX120165	Wellcome Trust	527009	178656	T6
WEX120158	Wellcome Trust	526580	178507	T6
WEX120159	Wellcome Trust	526619	178435	T6
WEX120162	Wellcome Trust	526689	178473	T6
WEX120163	Wellcome Trust	526771	178541	T6
WEX120164	Wellcome Trust	526889	178640	T6
WEX120166	Wellcome Trust	526923	178569	T6
WEX120167	Wellcome Trust	526985	178686	T6
WEX120168	Wellcome Trust	526876	178710	T6
WEX120169	Wellcome Trust	527254	179065	T6
WEX120170	Wellcome Trust	527372	179132	T6
WEX120172	Wellcome Trust	527340	179109	T6
WEX120174	Wellcome Trust	527614	178998	T6
WEX120166	Wellcome Trust	526923	178569	U11
WEX120158	Wellcome Trust	526580	178507	U11
WEX120159	Wellcome Trust	526619	178435	U11
WEX120162	Wellcome Trust	526689	178473	U11
WEX120163	Wellcome Trust	526771	178541	U11
WEX120164	Wellcome Trust	526889	178640	U11
WEX120165	Wellcome Trust	527009	178656	U11
WEX120167	Wellcome Trust	526985	178686	U11
WEX120168	Wellcome Trust	526876	178710	U11
WEX120169	Wellcome Trust	527254	179065	U11

Registration number	Organisation name	Site Easting	Site Northing	Exemption code
WEX120170	Wellcome Trust	527372	179132	U11
WEX120172	Wellcome Trust	527340	179109	U11
WEX120174	Wellcome Trust	527614	178998	U11
WEX120165	Wellcome Trust	527009	178656	U12
WEX120166	Wellcome Trust	526923	178569	U12
WEX120158	Wellcome Trust	526580	178507	U12
WEX120159	Wellcome Trust	526619	178435	U12
WEX120162	Wellcome Trust	526689	178473	U12
WEX120163	Wellcome Trust	526771	178541	U12
WEX120164	Wellcome Trust	526889	178640	U12
WEX120167	Wellcome Trust	526985	178686	U12
WEX120168	Wellcome Trust	526876	178710	U12
WEX120169	Wellcome Trust	527254	179065	U12
WEX120170	Wellcome Trust	527372	179132	U12
WEX120172	Wellcome Trust	527340	179109	U12
WEX120174	Wellcome Trust	527614	178998	U12
WEX120108	Wellcome Trust Ltd	526481	178232	T6
WEX120109	Wellcome Trust Ltd	526502	178435	T6
WEX120104	Wellcome Trust Ltd	526618	178165	T6
WEX120106	Wellcome Trust Ltd	526519	178190	T6
WEX120109	Wellcome Trust Ltd	526502	178435	U11
WEX120104	Wellcome Trust Ltd	526618	178165	U11
WEX120106	Wellcome Trust Ltd	526519	178190	U11
WEX120108	Wellcome Trust Ltd	526481	178232	U11

Registration number	Organisation name	Site Easting	Site Northing	Exemption code
WEX120109	Wellcome Trust Ltd	526502	178435	U12
WEX120108	Wellcome Trust Ltd	526481	178232	U12
WEX120104	Wellcome Trust Ltd	526618	178165	U12
WEX120106	Wellcome Trust Ltd	526519	178190	U12

## Appendix B: Waste Exports Data

### Data behind Figures 2-4

The following three tables provide the data behind Figures 2-4 which show the destinations of waste exports from Kensington and Chelsea for a typical recent year (2019). 2019 is preferred to 2020 as waste arisings and patterns of exports in 2020 would have been affected by Covid and may be anomalous.

Figure 2: LACW Waste Exports 2019

Destination	Tonnes of waste
Bexley	60,206
Wandsworth	17,495
All Others	671

Source: Waste Data Interrogator 2019

Figure 3: CD&E Waste Exports 2019

Destination	Tonnes of waste
Hillingdon	32,865
Windsor and Maidenhead	30,366
Enfield	20,949
Greenwich	14,497
Hertfordshire	9,625
Thurrock	8,762
Merton	8,702
Newham	8,257
All Others	20,694

Source: Waste Data Interrogator 2019

Figure 4: Hazardous Waste Exports 2019

Destination	Tonnes of waste
Cambridgeshire	1,103
Bexley	337
Newham	261
Kent	260
Hillingdon	201
Essex	199
All Others	461

Source: Hazardous Waste Data Interrogator 2019

## Waste Exports for the Duty to Co-operate

The following tables include data for each destination of strategic waste exports from Kensington and Chelsea over the last five years. This information is to facilitate duty to co-operate discussions with each waste planning authority which receives a strategic amount of waste from the borough.

What constitutes a 'strategic' level of waste movement will vary between waste planning authorities, however the guideline levels set out below have been agreed in London, south east and east of England as a starting point for considering whether dialogue is required. These levels are for the total quantum of movement to an area rather than to a single site.

- Non-hazardous waste – more than **5,000 tonnes** per annum
- Hazardous waste - more than **100t** per annum
- Inert waste - more than **10,000t** inert per annum

Note the 2020 Hazardous Waste Data Interrogator has not been published at the time of writing. The data for hazardous waste is therefore from 2015-2019 while data for LACW/C&I and CD&E is from 2016-2020.

### RBKC exports to Bexley via Wandsworth (tonnes)

Main recipient sites	Waste	2020	2019	2018	2017	2016
Belvedere energy recovery facility	LACW	60,206	61,593	61,717	62,282	63,542

Source: ENV18 - Local authority collected waste: annual results tables: Table 1: Local authority collected waste - not sent for recycling (tonnes)

### Hazardous waste exports to Bexley (tonnes)

Site	Source	2019	2018	2017	2016	2015
Incineration without energy recovery	HWDI	306	304	29	93	10
Other	HWDI	32	45	40	57	121
-	WDI	-	-	-	-	-

Source: Hazardous Waste Data Interrogator 2015-2019

### RBKC exports to Brent (tonnes)

Main recipient sites	Waste	2020	2019	2018	2017	2016
X - Bert Haulage	CDE	4,129	3,859	9,990	15,010	9,695
Total	CDE	4,129	3,859	9,990	15,010	9,695

Source: Waste Data Interrogator 2016-2020

### RBKC exports to Buckinghamshire (tonnes)

Main recipient sites	Waste	2020	2019	2018	2017	2016
Calvert Landfill Site	CDE	97	28	13	0	1,446
Gerrards Cross Landfill	CDE	0	0	0	0	13,988

Park Lodge Landfill Site	CDE	6,390	0	0	68,978	0
Hollybush Lane Aggregate Recycling Facility	CDE	693	46	4,516	207	-
Total	CDE	9,977	702	4,620	69,185	15,434

Source: Waste Data Interrogator 2016-2020

#### Hazardous waste exports to Cambridgeshire (tonnes)

Site	Source	2019	2018	2017	2016	2015
Landfill	HWDI	1,081	270	92	155	0
Recovery	HWDI	21	0	342	4	1
Other	HWDI	1	7	9	0	425
-	WDI	-	-	-	-	-

Source: Hazardous Waste Data Interrogator 2015-2019

#### RBKC exports to Ealing (tonnes)

Main recipient sites	Waste	2020	2019	2018	2017	2016
Willesden Freight Terminal	CDE	0	0	2,632	13,249	25,272
Total	CDE	0	0	2,632	13,249	25,272

Source: Waste Data Interrogator 2016-2020

#### RBKC exports to Enfield (tonnes)

Main recipient sites	Waste	2020	2019	2018	2017	2016
Enfield Bund Soil Management Area	CDE	3,227	15,030	1,350	-	-
Total	CDE	4,114	20,949	3,907	928	45

Source: Waste Data Interrogator 2016-2020

#### Hazardous waste exports to Essex (tonnes)

Site	Source	2019	2018	2017	2016	2015
Transfer (D)	HWDI	194	133	90	128	134
Other	HWDI	4	7	8	11	11
Windsor Waste Management Limited	WDI	93	60	17	-	-
Other	WDI	-	-	6	46	-

Source: Hazardous Waste Data Interrogator 2015-2019

#### RBKC exports to Greenwich (tonnes)

Main recipient sites	Waste	2020	2019	2018	2017	2016
Tunnel Wharf	CDE	13,761	13,596	2,593	-	-
Total	CDE	15,823	14,497	5,357	7,281	3,140

Source: Waste Data Interrogator 2016-2020

RBKC exports to Hillingdon (tonnes)

Main recipient sites	Waste	2020	2019	2018	2017	2016
Sipson North East Inert Landfill	CDE	7,740	32,865	46,950	3,690	4,860
Total	CDE	8,609	32,865	46,971	3,690	4,860

Source: Waste Data Interrogator 2016-2020

Hazardous waste exports to Hillingdon (tonnes)

Site	Source	2019	2018	2017	2016	2015
Incineration without energy recovery	HWDI	177	272	273	301	213
Other	HWDI	24	12	10	4	5
-	WDI	-	-	-	-	-

Source: Hazardous Waste Data Interrogator 2015-2019

Hazardous waste exports to Kent (tonnes)

Site	Source	2019	2018	2017	2016	2015
Incineration without energy recovery	HWDI	72	7	26	43	4
Recovery	HWDI	104	52	68	61	12
Other	HWDI	84	61	147	80	420
Larkfield Clinical Waste Facility	WDI	59	119	22	7	4
Other	WDI	0	0	1	0	0

Source: Hazardous Waste Data Interrogator 2015-2019

Hazardous waste exports to Medway (tonnes)

Site	Source	2019	2018	2017	2016	2015
Transfer (D)	HWDI	7	12	100	126	121
Treatment	HWDI	1	11	260	284	274
Other	HWDI	7	7	15	13	23
Kingsnorth Oil TP	WDI	62	-	-	-	6
Rochester Clinical Waste Treatment Facility	WDI	5	3	247	3	3

Source: Hazardous Waste Data Interrogator 2015-2019

RBKC exports to Merton (tonnes)

Main recipient sites	Waste	2020	2019	2018	2017	2016
Waste Transfer And Recovery Facility	CDE	6,009	8,702	12,972	11,551	6,855
Total	CDE	6,009	8,702	12,972	11,551	6,855

Source: Waste Data Interrogator 2016-2020

Hazardous waste exports to Newham (tonnes)

Site	Source	2019	2018	2017	2016	2015
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Recovery	HWDI	248	0	0	316	0
Other	HWDI	13	16	14	21	20
Waste Transfer Station, Silvertown	WDI	13	14	12	-	-

Source: Hazardous Waste Data Interrogator 2015-2019

#### Hazardous waste exports to Northamptonshire (tonnes)

Site	Source	2019	2018	2017	2016	2015
Landfill	HWDI	0	0	0	1,136	0
Transfer (R)	HWDI	0	0	0	10,265	0
Other	HWDI	7	2	2	1	0
East Northants RM Facility	WDI	-	22	-	-	-

Source: Hazardous Waste Data Interrogator 2015-2019

#### Hazardous waste exports to Slough (tonnes)

Site	Source	2019	2018	2017	2016	2015
Incineration without energy recovery	HWDI	1	1	55	103	104
Other	HWDI	1	1	0	0	0
Lakeside Clinical Waste Incinerator	WDI	1	-	-	-	-
Safetykleen West London	WDI	1	2	-	-	-

Source: Hazardous Waste Data Interrogator 2015-2019

#### Hazardous waste exports to Suffolk (tonnes)

Site	Source	2019	2018	2017	2016	2015
Recovery	HWDI	0	28	927	0	0
Other	HWDI	1	2	0	0	32
-	WDI	-	-	-	-	-

Source: Hazardous Waste Data Interrogator 2015-2019

#### RBKC exports to Surrey (tonnes)

Main recipient sites	Waste	2020	2019	2018	2017	2016
Hithermoor Recycling and Recovery Facility	CDE	0	0	0	20,828	10,592
Queen Mary Reservoir Recycling Facility	CDE	0	0	0	1,746	12,354
Total	CDE	0	397	1,506	24,334	27,971

Source: Waste Data Interrogator 2016-2020

#### Hazardous waste exports to Surrey (tonnes)

Site	Source	2019	2018	2017	2016	2015
Landfill	HWDI	0	0	175	18	49

Treatment	HWDI	0	19	117	502	759
Other	HWDI	1	5	5	31	0
Infinet House	WDI	-	3	2	18	3

Source: Hazardous Waste Data Interrogator 2015-2019

#### RBKC exports to Thurrock (tonnes)

Main recipient sites	Waste	2020	2019	2018	2017	2016
East Tilbury Quarry	CDE	1,755	3,297	28,867	1,577	229
Total	CDE	1,755	8,762	33,123	2,370	229

Source: Waste Data Interrogator 2016-2020

#### RBKC exports to Wandsworth (tonnes)

Main recipient sites	Waste	2020	2019	2018	2017	2016
Smugglers Way Transfer Station/MRF (WDI)	HIC	11,310	12,480	12,271	11,800	12,017
Smugglers Way Transfer Station/MRF (ENV18)	LACW	17,495	17,187	16,496	16,975	16,932
Cringle Dock (ENV18)	LACW	60,206	61,593	61,717	62,282	63,542

Source: Waste Data Interrogator 2016-2020 and ENV18 - Local authority collected waste: annual results tables: Table 1: Local authority collected waste

#### RBKC exports to Windsor and Maidenhead (tonnes)

Main recipient sites	Waste	2020	2019	2018	2017	2016
Kingsmead Landfill	CDE	-	30,366	24,120	19,098	-
Total	CDE	-	30,366	24,120	19,098	-

Source: Waste Data Interrogator 2016-2020

## Appendix C: Glossary

Term	Definition
<b>Agricultural Waste</b>	Waste from a farm or market garden, consisting of matter such as manure, slurry and crop residues.
<b>Biodegradable Waste</b>	Organic waste from gardening and landscaping activities, as well as food preparation and catering activities. Biodegradable waste produces greenhouse gases including methane if it is landfilled.
<b>Circular Economy</b>	Looking beyond the current take-make-waste extractive industrial model, a circular economy aims to redefine growth, focusing on positive society-wide benefits. It entails gradually decoupling economic activity from the consumption of finite resources and designing waste out of the system. Underpinned by a transition to renewable energy sources, the circular model builds economic, natural, and social capital. It is based on three principles: Design out waste and pollution; Keep products and materials in use; Regenerate natural systems (Ellen MacArthur Foundation)
<b>Commercial and Industrial Waste (C&amp;I)</b>	Controlled waste arising from commercial premises and industrial processes.
<b>Construction, Demolition and Excavation Waste (CD&amp;E)</b>	Controlled waste arising from the construction, repair, maintenance and demolition of buildings and structures.
<b>Energy from Waste (EfW)</b>	The conversion of waste into a useable form of energy, often heat or electricity.
<b>Exemption</b>	A waste exemption is a waste operation that is exempt from needing an environmental permit. Each exemption has specific limits and conditions operators need to work within.
<b>Hazardous Waste</b>	Waste that poses substantial or potential threats to public health or the environment (when improperly treated, stored, transported or disposed). This can be due to the quantity, concentration, or characteristics of the waste.
<b>HIC</b>	Household, Industrial and Commercial waste. This term is used in waste data sources. These waste streams are also known as Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste. The term HIC is used to describe the throughput where a facility manages both waste streams.
<b>Household Waste</b>	Refuse from household collection rounds, waste from street sweepings, public litter bins, bulky items collected from

Term	Definition
	households and wastes which householders themselves take to household waste recovery centres and "bring sites".
<b>Inert waste</b>	Waste not undergoing significant physical, chemical or biological changes following disposal, as it does not adversely affect other matter that it may come into contact with, and does not endanger surface or groundwater.
<b>Local Authority Collected Waste (LACW)</b>	Household waste and any other waste collected by a waste collection authority such as municipal parks and gardens waste, beach cleansing waste and waste resulting from the clearance of fly-tipped materials.
<b>Landfill</b>	The permanent disposal of waste into the ground, by the filling of man-made voids or similar features.
<b>LLW – low level radioactive waste</b>	Lightly contaminated miscellaneous scrap, including metals, soil, building rubble, paper towels, clothing and laboratory equipment.
<b>Materials Recycling Facility (MRF)</b>	A facility for sorting and packing recyclable waste.
<b>Recovery</b>	Value can be recovered from waste by recovering materials through recycling, composting or recovery of energy.
<b>Recyclate</b>	Raw material sent to, and processed in, a waste recycling plant or materials recovery facility (e.g. plastics, metals, glass, paper/card).
<b>Recycling</b>	The reprocessing of waste either into the same product or a different one.
<b>Residual Waste</b>	Waste remaining after materials for re-use, recycling and composting have been removed.
<b>Waste Hierarchy</b>	A framework for securing a sustainable approach to waste management. Waste should be minimised wherever possible. If waste cannot be avoided, then it should be re-used; after this it should be prepared for recycling, value recovered by recycling or composting or waste to energy; and finally, disposal.
<b>Waste Local Plan</b>	A statutory development plan prepared (or saved by the waste planning authority, under transitional arrangements), setting out policies in relation to waste management and related developments.

Term	Definition
<b>Waste Minimisation / Reduction</b>	The most desirable way of managing waste, by avoiding the production of waste in the first place.
<b>Waste Planning Authority (WPA)</b>	The local authority responsible for waste development planning and control. They are unitary authorities, including London Boroughs and the City of London, National Park Authorities, and county councils in two-tier areas.
<b>Waste Disposal Authority</b>	Waste disposal authorities have a statutory responsibility to manage waste which is collected by local councils (Local Authority Collected Waste)
<b>Waste Transfer Station</b>	A site to which waste is delivered for sorting or baling prior to transfer to another place for recycling, treatment or disposal.