

## 15. Waste



### 15.1 Introduction

- 15.1.1 This section considers both strategic waste management 'apportionment' (i.e. land allocation for waste management facilities) and bin storage and management in new development.
- 15.1.2 The Council, as well as being a Local Planning Authority (LPA), is a Waste Planning Authority (WPA). WPAs are responsible for determining all waste development planning applications and have a statutory duty to prepare a local waste plan, either individually or as part of a wider Local Plan.

### 15.2 Existing Local Plan policy

- 15.2.1 The existing Local Plan policy relating to waste is set out below.
- 15.2.2 Subsection 'a' deals with the issue of strategic waste management 'apportionment'. The Council's commitment in this subsection to prepare a specific waste 'Development Plan Document' (DPD) is now being followed up as part of this Local Plan Partial Review consultation: rather than have a separate waste 'DPD', the Council currently intends to update the waste apportionment evidence base and policy as part of the wider Local Plan Partial Review.
- 15.2.3 Subsections 'b' to 'e' largely deal with site-specific issues regarding on-site waste storage and management as part of new development proposals. This Local Plan Partial Review consultation considers the issues regarding this too to inform revised draft policy.

### **Policy CE3 Waste**

The Council will meet the waste apportionment figure as set out in the London Plan and will ensure that waste is managed in accordance with the waste hierarchy, which is to reduce, reuse or recycle waste as close as possible to where it is produced.

To deliver this the Council will:

- a. Prepare a specific waste DPD to show how the waste apportionment figure of 309,000 tonnes per annum by 2010 required by the London Plan will be met. This will include:
  - identifying suitable sites for the purpose of managing the waste;
  - identifying which boroughs the Council will be working with and how much the pooled apportionment of those boroughs will be so that the apportionment figure can be met;
  - working in partnership with the GLA and neighbouring boroughs to meet the apportionment figure;
  - safeguarding the existing waste management sites along with Cremorne Wharf, maximising its use for waste management, water transport and cargo-handling purposes;
- b. require on-site waste management facilities as part of development at Kensal and Earl's Court to handle waste arising from the new uses on the site (this could include facilities such as recycling facilities and anaerobic digestion);
- c. require provision of adequate refuse and recycling storage space which allows for ease of collection in all developments;
- d. require that development proposals make use of the rail and the waterway network for the transportation of construction waste and other waste;
- b. require applicants for major developments to prepare and implement Site Waste Management Plans for demolition and construction waste.

### **London Borough of Hammersmith and Fulham (LBHF)**

- 15.2.4 It is also appropriate to reference LBHF's existing Core Strategy (October 2011)<sup>276</sup> policy on waste which states:

### **Borough Wide Strategic Policy CC3 Waste Management**

To pursue sustainable waste management, including... planning to manage 348,000 tonnes per annum of waste in H&F by 2031...

- 15.2.5 The supporting text for Policy CC3 of LBHF's Core Strategy states:

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<sup>276</sup>

[www.lbhf.gov.uk/Directory/Environment\\_and\\_Planning/Planning/Planning\\_policy/164525\\_Core\\_Strategy.asp](http://www.lbhf.gov.uk/Directory/Environment_and_Planning/Planning/Planning_policy/164525_Core_Strategy.asp)

8.102 Neighbouring boroughs have indicated a desire to work in partnership with Hammersmith and Fulham to assist in meeting their waste apportionment targets. The Royal Borough of Kensington and Chelsea has an anticipated capacity shortfall of 200,000 tonnes of waste to 2031. Spare waste management capacity of up to 220,000 tonnes has been identified within Hammersmith & Fulham. This spare capacity could accommodate the needs of the Royal Borough of Kensington and Chelsea and be utilised for that purpose.

- 15.2.6 LBHF published a revised Draft Local Plan<sup>277</sup> for consultation in January 2015 to ultimately supersede its existing Core Strategy. In the Draft Local Plan, LBHF proposed to replace Strategic Policy CC3 (above) with a new Policy CC6 as well as deletion of the above paragraph 8.102. The Royal Borough responded to the Draft Local Plan consultation, objecting to the deletion of the paragraph.

## 15.3 Legislation, policy and guidance context

### European

#### Waste Framework Directive (2008/98/EC)

- 15.3.1 The Waste Framework Directive (2008/98/EC) (“the Directive”) provides an overarching legislative framework for the management of waste across Europe. Its transposition in England is now largely through the Waste (England and Wales) Regulations 2011, which came into force on 29 March 2011.
- 15.3.2 Article 16 of the Directive is particularly relevant to the issue of apportionments because it covers ‘Principles of Self Sufficiency and Proximity’. In meeting the requirement of the proximity principle, there is no expectation that each WPA will deal solely with its own waste. For instance, there are clearly some waste streams which are produced in small quantities for which it would be uneconomic to have a facility in each local authority. There could also be significant economies of scale for local authorities working together to assist with the development of a network of waste management facilities to enable waste to be handled effectively.

### National

#### Waste (England and Wales) Regulations 2011

- 15.3.3 Part 6 of the Regulations is relevant to planning authorities. Within this Part, Regulation 18 particularly requires the Council to have regard to specific articles of the European Waste Framework Directive (including Article 16) in exercising its planning functions, which includes Local Plan making.

#### National Planning Policy Framework (NPPF)

- 15.3.4 The National Planning Policy Framework (NPPF) does not contain specific policies on waste, but Councils “preparing waste plans and taking decisions on

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<sup>277</sup>

[www.lbhf.gov.uk/Directory/Environment\\_and\\_Planning/Planning/Planning\\_policy/181500\\_Local\\_Plan\\_Review.asp](http://www.lbhf.gov.uk/Directory/Environment_and_Planning/Planning/Planning_policy/181500_Local_Plan_Review.asp)

waste applications should have regard to policies in [the] Framework so far as relevant” (paragraph 5).

- 15.3.5 Paragraph 156 of the NPPF states that Councils should set out the “strategic priorities” for their area in the Local Plan, which includes delivering “waste management” infrastructure (see also paragraph 162).

#### [National Planning Policy for Waste \(NPPW\)](#)

- 15.3.6 The National Planning Policy for Waste (NPPW) contains the latest Government planning policy on waste. The NPPW states that WPAs should (paragraphs 2-3):

work jointly and collaboratively with other planning authorities to collect and share data on waste arisings...

...

identify the tonnages and percentage of municipal, and commercial and industrial, waste requiring different types of management in their area over the period of the plan (In London, WPAs should have regard to their apportionments set out in the London Plan when preparing their plans)

...

work collaboratively in groups with other WPAs... through the statutory duty to cooperate, to provide a suitable network of facilities to deliver sustainable waste management

#### [National Planning Practice Guidance \(NPPG\): Waste](#)

- 15.3.7 The National Planning Practice Guidance (NPPG) on Waste provides guidance to complement the NPPW. In particular, the NPPG advises that in London, “WPAs should have regard to the apportionments set out in the London Plan when developing their policies. The Local Waste Plan will need to be in general conformity with the London Plan” (paragraph 42).

#### [Waste Management Plan for England](#)

- 15.3.8 The Waste Management Plan for England, states that “All local planning authorities should have regard to both the waste management plan for England and the national waste planning policy when discharging their responsibilities to the extent that they are appropriate to waste management. WPAs remain responsible for developing local authority waste plans as part of their wider strategic planning responsibilities, in support of the Waste Management Plan for England” (page 30).

- 15.3.9 The Waste Management Plan for England satisfies the Government’s requirement to produce a waste management plan covering all of its territory (page 2). The Plan also reiterates the ‘waste hierarchy’ prioritising different waste stream cycles: prevention, preparing for re-use, recycling, other recovery and disposal (page 11).

- 15.3.10 Regulation 10 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires Local Plans to have regard to the national waste management plan – i.e. the Waste Management Plan for England.

Building Regulations 2010 Part H Drainage and Waste Disposal Approved Document

- 15.3.11 Regarding the issue of on-site waste management as part of new developments (i.e. bin storage), it should be noted that the provision of “storage of solid waste” and “adequate means of access” is a standard Building Regulations requirement.

**Regional**

The London Plan

- 15.3.12 The London Plan apportions waste arisings to each London Borough for them each to allocate sufficient land to deal with the apportioned amount of waste per year. This is to work towards net self sufficiency of waste management in London by 2026. The London Plan states:

The Mayor will work with London boroughs and waste authorities... to... manage as much of London’s waste within London as practicable, working towards managing the equivalent of 100 per cent of London’s waste within London by 2026

(Policy 5.16 Waste Net Self-Sufficiency – subsection A)

Boroughs must allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in this Plan. Boroughs may wish to collaborate by pooling their apportionment requirements

(Policy 5.17 Waste Capacity – subsection F)

Land to manage borough waste apportionments should be brought forward through... safeguarding wharves... with an existing or future potential for waste management

(Policy 5.17 Waste Capacity – subsection G)

If, for any reason, an existing waste management site is lost to non-waste use, an additional compensatory site provision will be required that normally meets the maximum throughput that the site could have achieved

(Policy 5.17 Waste Capacity – subsection H)

Waste is deemed to be managed in London if: it is used in London for energy recovery; it related to materials sorted or bulked in London facilities for reuse, reprocessing or recycling; [or] it is materials reused, recycled or reprocessed in London...

(paragraph 5.79)

Boroughs may collaborate by pooling their apportionment requirements. Provided the aggregated total apportionment figure is met, it is not necessary for boroughs to meet both the municipal and commercial/industrial waste apportionment figures individually

(paragraph 5.80)

- 15.3.13 Table 5.3 of the London Plan sets out each London Borough’s apportionment of waste to be managed. For this Council, the apportionment is 194,000 tonnes per

annum to 2031.

### Land for Industry and Transport Supplementary Planning Guidance (SPG)

- 15.3.14 Chapter 6 of the Land for Industry and Transport Supplementary Planning Guidance (SPG) covers waste management and recycling. Paragraph 6.5 suggests that “waste transfer” operations “are not accounted for in the London Plan apportionment”. Paragraph 6.7 states that “Boroughs should assess how they will accommodate new waste management facilities. These assessments should cover local quantitative and qualitative appraisals of vacant and occupied industrial land”.
- 15.3.15 Implementation point 6 of the SPG states that Boroughs should “have regard to the indicative land requirements for additional waste management and recycling facilities 2011-2031 set out in Annex 2”. Annex 2 of the SPG sets out the Council’s previous London Plan waste apportionment to 2031 of 284,000 tonnes per annum (since revised down in 2015 to 194,000) and suggest this equates to a Net Additional Indicative Land Requirement for Waste of 3.6 hectares (so roughly equivalent to 80,000 tonnes per annum per hectare).

### Safeguarded Wharves

- 15.3.16 The Safeguarded Wharves Review provides evidence supporting a number of wharves which the Mayor recommends are ‘safeguarded’ for wharf uses. The only wharf which lies in the Borough, Cremorne Wharf, is recommended to be retained for safeguarding. The Review states that Cremorne Wharf “may be required... for the Thames Tideway Tunnel for the medium term, following that it should be able to contribute to the shortfall in wharf capacity in West London” (Table 7.1).

### London’s Wasted Resource: The Mayor’s Municipal Waste Management Strategy

- 15.3.17 The Mayor’s Municipal Waste Management Strategy is not a planning document but sets out an overarching strategy for the Mayor to manage London’s municipal waste more effectively and efficiently. Of particular relevance, Policy 2 seeks to reduce the climate change impact of London’s municipal waste management and Policy 5 seeks to stimulate the development of new municipal waste management infrastructure.

### London Infrastructure Plan 2050 Update

- 15.3.18 The London Infrastructure Plan sets out the overall infrastructure needs of the capital up to 2050 regarding transport, green infrastructure, digital connectivity, energy, ‘a circular economy’, water, housing and social infrastructure. Chapter 16 sets out an infrastructure requirement of “Around 40 facilities for reuse, remanufacturing, recycling and waste management” in London.

### Summary

- 15.3.19 Figure 15.1 summarises the main legislation, policy and guidance of particular relevance to this section:

Date	Document	Organisation
Nov 2008	Waste Framework Directive (2008/98/EC) <sup>278</sup>	EU
Mar 2011	The Waste (England and Wales) Regulations 2011 <sup>279</sup>	HM Government
May 2015	Building Regulations 2010 Part H Drainage and Waste Disposal Approved Document <sup>280</sup>	HM Government
Mar 2012	National Planning Policy Framework (NPPF) <sup>281</sup>	DCLG
Oct 2014	National Planning Policy for Waste (NPPW) <sup>282</sup>	DCLG
Oct 2014	National Planning Practice Guidance (NPPG): Waste <sup>283</sup>	DCLG
Dec 2013	Waste Management Plan for England <sup>284</sup>	DEFRA
Jun 2000	Cremorne Safeguarded Wharf Direction <sup>285</sup>	DETR / Mayor of London
Nov 2011	London's Wasted Resource: The Mayor's Municipal Waste Management Strategy <sup>286</sup>	Mayor of London
Sep 2012	Land for Industry and Transport Supplementary Planning Guidance (SPG) <sup>287</sup>	Mayor of London
Mar 2013	Safeguarded Wharves Review – Final Recommendation <sup>288</sup>	Mayor of London
Mar 2015	London Plan <sup>289</sup>	Mayor of London
Mar 2015	London Infrastructure Plan 2050 Update <sup>290</sup>	Mayor of London

Figure 15.1: Summary of legislation, policy and guidance

## 15.4 Evidence base

### Waste apportionment

#### The Borough and Cremorne Wharf

15.4.1 The Council collects over 60,000 tonnes of municipal waste every year<sup>291</sup>. As set out in section 3, the London Plan's apportionment figure for the Borough is 194,000 tonnes per annum by 2031 which, assuming approximately 80,000 tonnes per annum capacity per hectare, requires 2.4 hectares of land to manage this waste.

15.4.2 The Council's existing Local Plan Policy CE3(a) safeguards Cremorne Wharf for

<sup>278</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:312:0003:0030:en:PDF>

<sup>279</sup> [www.legislation.gov.uk/ukdsi/2011/9780111506462/contents](http://www.legislation.gov.uk/ukdsi/2011/9780111506462/contents)

<sup>280</sup> [www.planningportal.gov.uk/buildingregulations/approveddocuments/parth/approved](http://www.planningportal.gov.uk/buildingregulations/approveddocuments/parth/approved)

<sup>281</sup> <http://planningguidance.planningportal.gov.uk/blog/policy/>

<sup>282</sup> [www.gov.uk/government/publications/national-planning-policy-for-waste](http://www.gov.uk/government/publications/national-planning-policy-for-waste)

<sup>283</sup> <http://planningguidance.communities.gov.uk/blog/guidance/waste/>

<sup>284</sup> [www.gov.uk/government/publications/waste-management-plan-for-england](http://www.gov.uk/government/publications/waste-management-plan-for-england)

<sup>285</sup> [www.london.gov.uk/priorities/planning/strategic-planning-applications/safeguarded-wharves-direction](http://www.london.gov.uk/priorities/planning/strategic-planning-applications/safeguarded-wharves-direction)

<sup>286</sup> [www.london.gov.uk/priorities/environment/publications/the-mayors-waste-management-strategies](http://www.london.gov.uk/priorities/environment/publications/the-mayors-waste-management-strategies)

<sup>287</sup> [www.london.gov.uk/priorities/planning/publications/land-for-industry-and-transport-spg](http://www.london.gov.uk/priorities/planning/publications/land-for-industry-and-transport-spg)

<sup>288</sup> [www.london.gov.uk/priorities/planning/publications/safeguarded-wharves-review-2011-2012](http://www.london.gov.uk/priorities/planning/publications/safeguarded-wharves-review-2011-2012)

<sup>289</sup> [www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan](http://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan)

<sup>290</sup> [www.london.gov.uk/priorities/business-economy/vision-and-strategy/infrastructure-plan-2050](http://www.london.gov.uk/priorities/business-economy/vision-and-strategy/infrastructure-plan-2050)

<sup>291</sup> RBKC 2015

waste management purposes. However, Cremorne Wharf is not currently operational as a waste management facility and is 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. Because of the definitions in London Plan paragraph 5.79 and the Land for Industry and Transport SPG paragraph 6.5 (see above section 3), it is not currently considered that Cremorne Wharf is able to contribute towards the Borough's apportionment. Even if it was capable, it would be unlikely to have such a capacity to fully address the Borough's apportionment.

15.4.3 Therefore, the Council needs to identify suitable land elsewhere to assist with its apportionment shortfall.

**Western Riverside Waste Authority (WRWA) WPAs**

15.4.4 The Western Riverside Waste Authority (WRWA)<sup>292</sup> is the statutory body, or local authority, responsible for the management of the waste delivered to it by the Royal Borough of Kensington and Chelsea (RBKC), the London Borough of Hammersmith and Fulham (LBHF), the London Borough of Wandsworth (LBW) and the London Borough of Lambeth (LBL).

15.4.5 These Councils are also WPAs in their own right and the Council has been working closely with these 'WRWA WPAs' to prepare a joint evidence base regarding waste apportionments.



Figure 15.2: London's unitary waste authorities<sup>293</sup>

<sup>292</sup> [www.wrwa.gov.uk](http://www.wrwa.gov.uk)

<sup>293</sup> From Figure 3 of the Mayor's Municipal Waste management Strategy (Nov 2011)

15.4.6 More recently, the Old Oak Park Royal Development Corporation (OPDC) has been established (April 2015) within parts of the jurisdiction of LBHF, and the London Boroughs of Brent and Ealing (LBB and LBE). The OPDC is a WPA in its own right. Whilst the OPDC's waste apportionment and sites within the jurisdictions of LBB and LBE fall within the recently-adopted (2015) West London Waste Plan's remit, the OPDC's waste apportionment and sites within the jurisdiction of LBHF currently only fall within the remit of LBHF's existing Core Strategy (2011) in terms of a 'waste plan'. Because this latter part of the OPDC's jurisdiction falls within the area covered by the WRWA, the OPDC has more recently been included in the joint waste evidence base work with the other WRWA WPAs – but only concerning its land within LBHF.

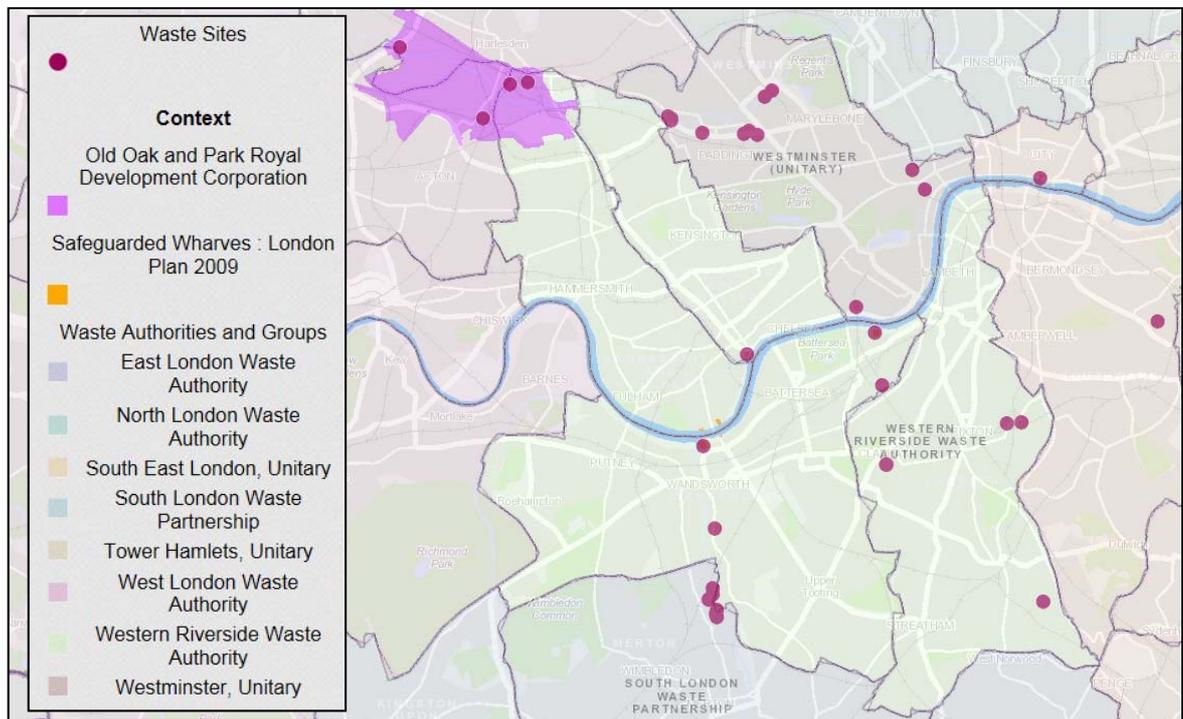


Figure 15.3: WRWA WPAs, the OPDC, waste sites and safeguarded wharves<sup>294</sup>  
 NB: not all waste sites contribute to waste apportionment capacities

15.4.7 The emerging joint waste evidence base work has so far determined that, even when pooling apportionments and capacity, the WRWA WPAs are not able to jointly meet their London Plan waste apportionment capacities as a single entity, with a shortfall of approximately 504,433 tonnes of waste per annum.

15.4.8 In April 2015, the WRWA WPAs (excluding OPDC which had only just been established at the time) sent a letter to other London WPAs (i.e. Boroughs) setting out the emerging joint evidence base work and asking whether or not they could share any 'spare' waste capacity. An 'Engagement Statement' which includes the letter, the evidence base tables, the key issues raised by London WPAs in their responses and the WRWA WPAs' joint responses has been published at [www.rbkc.gov.uk/planningpolicy](http://www.rbkc.gov.uk/planningpolicy).

<sup>294</sup> GLA Waste Map <https://maps.london.gov.uk/webmaps/waste/>

## Actual WRWA waste management arrangements

- 15.4.9 The Council is statutorily required to deliver its municipal waste to places as directed by WRWA. Currently all of the municipal waste goes to WRWA facilities in Wandsworth for transfer and treatment (Western Riverside Transfer Station near Wandsworth Bridge and Cringle Dock Transfer Station next to Battersea Power Station). Since 2011, recyclables go to a Materials Recycling Facility at Smugglers Way in Wandsworth and residuals are barged down river to the Riverside Resource Recovery Limited (RRRL)'s facility at Belvedere, in the London Borough of Bexley where the waste is incinerated to generate electricity. It is the largest Energy from Waste (EfW) facility in the UK and one of the largest in Europe, which will eventually generate up to 72MW of power. This is confirmed by the WRWA's Waste Policy Statement (July 2013)<sup>295</sup> which also states that the facility can handle 670,000 tonnes of waste per year although the WRWA supplies around 300,000 tonnes of residual waste to it (paragraphs 11-12).
- 15.4.10 This contract is understood to run until 2031 meaning that, in reality, waste arisings from the Borough and the other WRWA WPAs are dealt with in Bexley.

### Duty to Cooperate

- 15.4.11 The joint working of the WRWA WPAs on the waste evidence base and the dialogue with other London WPAs is a reflection of the duty to cooperate.
- 15.4.12 Section 110 of the Localism Act 2011 inserted section 33A into the Planning and Compulsory Purchase Act 2004 which requires Councils to cooperate with other prescribed bodies. The duty requires, in particular, a duty to “engage constructively, actively and on an ongoing basis” in relation to “maximising the effectiveness” of, and having “regard to”, activities concerned with supporting or preparing planning policies “so far as relating to a strategic matter”.
- 15.4.13 A strategic matter is defined as “sustainable development or use of land that has or would have a significant impact on at least two planning areas including... in connection with infrastructure that is strategic” (section 33A(4)). Clearly, waste management is a strategic matter for the purposes of the duty.

### Summary

- 15.4.14 A summary of waste evidence base documents is provided in Figure 15.4.

Date	Document	Organisation
Jul 2013	Waste Policy Statement <sup>296</sup>	WRWA
Mar 2014	Local Infrastructure Delivery Plan (IDP)	RBKC
Apr 2015	Duty to Cooperate Letter / Joint Evidence Base <sup>297</sup>	WRWA WPAs
Sep 2015	Engagement Statement <sup>298</sup>	WRWA WPAs

*Figure 15.4 Summary of principal sources of evidence*

<sup>295</sup> [www.wrwa.gov.uk/media/44808/waste-policy-statement-july-2013.pdf](http://www.wrwa.gov.uk/media/44808/waste-policy-statement-july-2013.pdf)

<sup>296</sup> [www.wrwa.gov.uk/media/44808/waste-policy-statement-july-2013.pdf](http://www.wrwa.gov.uk/media/44808/waste-policy-statement-july-2013.pdf)

<sup>297</sup> Within the WRWA WPAs Waste Apportionments Engagement Statement [www.rbkc.gov.uk/planningpolicy](http://www.rbkc.gov.uk/planningpolicy)

<sup>298</sup> [www.rbkc.gov.uk/planningpolicy](http://www.rbkc.gov.uk/planningpolicy)

## Bin storage and management in new development

- 15.4.15 Existing Local Plan Policy CE3(c) requires provision of adequate refuse and recycling storage space which allows for ease of collection in all developments. When a proposal is considered likely to give rise to additional waste management demand the Council requires it be demonstrated that this be planned for and designed into the scheme. This is normally secured by a pre-commencement condition requiring details of the refuse storage areas be submitted for approval.
- 15.4.16 Bin blight<sup>299</sup> continues to be an issue across the country, and is particularly visible in the dense urban context of Kensington and Chelsea. When a development involves conversions of older properties into multiple units, their very nature can lead to difficulties with provision of waste storage space and can give rise to significant issues relating to waste storage and management. The London Environment Director's Network (LEDNET) and London Waste and Recycling Board (LWARB) have published a template planning policy for recycling and waste in flatted developments<sup>300</sup> to help address these issues.
- 15.4.17 Tonnages for recycling and residual waste in the Borough have recently been heading in the wrong direction and have been lower than forecast, in common with some other local authorities. Between 2013/14 and 2014/15 overall waste (municipal waste) tonnages rose by 0.29%. General waste (municipal residual waste) increased by 0.72% and recycling tonnages decreased by 1.37%. Given that residual waste treatment is more expensive than recycling, shifting waste from the residual waste stream to the recycling stream will not only save money, it will also improve recycling rates<sup>301</sup>.

## 15.5 Issues and options

### Issue 1: Waste apportionment

#### Option 1

The Council should identify a site or sites within the Borough to address its apportionment shortfall entirely within the Borough.

#### Option 2

The Council should continue to work with the other WRWA WPAs to jointly identify a site or sites within the WRWA area to address their collective apportionment shortfall entirely within the WRWA area.

#### Option 3

The Council should continue to work with the other WRWA WPAs and collectively secure spare apportionment capacity outside of the WRWA area, but within London, to address the WRWA WPAs' collective apportionment shortfall.

<sup>299</sup> [www.gov.uk/government/news/government-action-to-take-on-town-hall-bin-blight](http://www.gov.uk/government/news/government-action-to-take-on-town-hall-bin-blight)

<sup>300</sup> London Environment Directors' Network (LEDNET) and the London Waste and Recycling Board (LWARB) Template Planning Policy for recycling and waste in flatted developments: For new build flats in London (January 2015) [www.lwarb.gov.uk/what-we-do/london-waste-authority-support/successes-to-date/efficiencies-programme-outputs/](http://www.lwarb.gov.uk/what-we-do/london-waste-authority-support/successes-to-date/efficiencies-programme-outputs/)

<sup>301</sup> RBKC 2015

**Question 1**

Are there any sites (or areas) that should be considered as a site (or area) allocation as part of the Local Plan Partial Review for waste management? If so, please complete the Call for Sites section of the Consultation Response Form (Appendix C).

**Question 2**

Should the Council continue to safeguard Cremorne Wharf for waste management, water transport and cargo handling purposes?

**Do you have any other comments, issues or options (reasonable alternatives) you would like to raise regarding this section?**

**Issue 2: Bin storage and management in new development****Option 1**

Keep existing Local Plan Policy CE3 (b), (c) and (e) structured and worded as it is.

**Option 2**

Amend existing Local Plan Policy CE3 (b), (c) and (e) to consider issues such as:

- Temporary storage space within each flat/apartment allowing for the separate storage of recyclable materials
- Communal storage for waste, including separate recyclables, pending its collection
- Design, quality and access of storage and collection systems (e.g. dedicated rooms, storage areas and chutes or underground waste collection systems)
- Managing, to acceptable levels, impacts on amenity including those that may be caused by odour, noise, and dust
- On-site treatment of waste
- Adequate contingency measures to manage any mechanical breakdowns<sup>302</sup>

**Do you have any other comments, issues or options (reasonable alternatives) you would like to raise regarding this section?**

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<sup>302</sup> List adapted from the London Environment Directors' Network (LEDNET) and the London Waste and Recycling Board (LWARB) Template Planning Policy for recycling and waste in flatted developments: For new build flats in London (January 2015) [www.lwarb.gov.uk/what-we-do/london-waste-authority-support/successes-to-date/efficiencies-programme-outputs/](http://www.lwarb.gov.uk/what-we-do/london-waste-authority-support/successes-to-date/efficiencies-programme-outputs/)