**Aims**
The aim of this report is to provide the evidence base for identifying a site allocation(s) for waste management and the development of the ‘Managing Waste’ development management policy within the Managing Development DPD.

**Background**
European, national and regional guidance on waste emphasise that as much of their waste as practicable should be managed locally at the nearest appropriate stations. This limits the harmful impact of carbon emissions and wasteful use of natural resources of transporting the waste to far away destinations.

PPS 10: Planning for Sustainable Waste Management requires Regional Planning Authorities (including the Greater London Authority) to identify the amount of waste that is required to be managed and apportion this by waste authority area. This is aimed at ensuring that sufficient capacity is identified in each region so that waste can be managed as close to the place where it is produced as possible.

The London Plan 2011 identifies a hierarchy of steps that the Council must take to manage its waste. In the first instance, the Council must reduce the waste, then consider reuse or reduction in the use of materials, and finally consider recycling and composting, before energy recovery and disposal. It requires that “boroughs must allocate sufficient land and identify waste management facilities to manage the tonnages of waste apportioned in this Plan”. It adds that boroughs may like to pool their apportionment requirements. Subsequently, it provides projections for each borough for the apportionment of municipal and commercial and industrial waste that it has to manage up to 2031.

Tower Hamlets is a Unitary Waste Planning Authority. It is not part of a joint waste authority unlike Newham, Barking and Dagenham, Redbridge, Havering (neighbouring boroughs) who are part of East London Waste Authority. Therefore, Tower Hamlets has been apportioned its own waste apportionment target by the London Plan for processing domestic and commercial & industrial waste. It needs to identify sufficient land to meet its waste apportionment targets.

**Meeting the London Plan waste apportionment target**
Spatial Policy 05 of the TH Core Strategy 2010 acknowledges the previous London Plan target for Tower Hamlets to identify sites to process a total of 484,000 tonnes of domestic and commercial waste per annum by 2020. It estimated that between 5 and 10 hectares of land would be need to be allocated to ensure there is sufficient capacity to meet this target (not including demolition or construction waste). This is based on the detailed technical evidence set out in the ‘Waste Evidence Base Report’ 2009, prepared to inform the Core Strategy.

Subsequently, the borough’s waste apportionment target has been revised in the London Plan (2011), which now requires Tower Hamlets to identify sites to process a total of 351,000 tonnes of waste per annum by 2021, and 394, 000 tonnes by 2026. This is estimated to require between 3.6 and 7.3 hectares of land to be allocated over the Core Strategy period to 2025. This is based on a proportionate decrease of the previous land requirement of between 5 and 10 hectares.

The London Plan requires that sites allocated for managing waste apportionment should be suitable in terms of capacity, proximity to source, environmental impact on surrounding areas (noise, smell, visual) and transport movement (this criteria is expanded upon in the Core Strategy Spatial Policy 05).
To help meet the waste apportionment targets, the Managing Development DPD provides development management policies and a site allocation for the management of waste in the borough.

**Using existing sites**
The LBTH Waste Evidence Base Report (2009) identified six licensed waste management facilities within the borough which are required to be safeguarded in accordance with the London Plan and Core Strategy:

**Table 1: Availability of sites within Tower Hamlets (shown in appendix 1)**

<table>
<thead>
<tr>
<th>S.No.</th>
<th>Licensed Waste Facility</th>
<th>Size (ha)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Clifford Devlin Ltd (80616)</td>
<td>0.37</td>
</tr>
<tr>
<td>2</td>
<td>Fish Island Mid (80134)</td>
<td>0.025</td>
</tr>
<tr>
<td>3</td>
<td>Ailsa Street (part of larger site)(80132)</td>
<td>0.89</td>
</tr>
<tr>
<td>4</td>
<td>Northumberland Wharf (80133)</td>
<td>0.62</td>
</tr>
<tr>
<td>5</td>
<td>Fish Island South (part of larger site) (80137)</td>
<td>0.41</td>
</tr>
<tr>
<td>6</td>
<td>McGrath (80614)</td>
<td>2.68</td>
</tr>
<tr>
<td></td>
<td><strong>Total</strong></td>
<td><strong>4.99</strong></td>
</tr>
</tbody>
</table>

Source: LBTH Waste Evidence Base Report, 2009

These sites provide 4.99 hectares of safeguarded land which is the mid point between the 3.6 and 7.3 hectares of land required to meet the borough’s waste apportionment target. This means that even though none of the sites currently process waste, they have the potential to meet the Council’s waste apportionment target depending on the technology used.

The Council does not consider that all of the existing sites provide the best long term solution for the sustainable management of waste in terms of sufficient recycling, composting or treatment capacity given their size, location and accessibility. For example, the McGrath site has been identified as being more appropriate for mixed use redevelopment providing new homes, jobs and open space as part of the wider regeneration proposals set out in the Fish Island Area Action Plan. The Council is therefore required to allocate potential new site(s) for waste management, or agree with the GLA for part or its entire waste apportionment target to be dealt with by another Borough, to provide a long term solution for managing waste apportionment and for any of the existing waste sites to be released.

**Finding additional land**
The Managing Development DPD needs to allocate suitable sites to manage waste with a total land area of between approximately 3.6 and 7.3 hectares (see above). The Waste Evidence Base Report (2009) provided a starting point for the additional land by identifying a short list of six sites:

- Fish Island South (TH-17) – 12.63 ha
- Empson Street (TH-09) – 10.16 ha
- Council Transport Depot (TH-03) – 1.87 ha
- Northumberland Wharf (Yabsley Street)(TH-20) – 0.85 ha
- Ailsa Street (TH-07) – 3.61 ha
- The Highway Local Industrial Location (TH-50) – 0.65 ha
These were then used to inform the location of the ‘areas of search’ within the Core Strategy (2010):

- Fish Island South
- Bromley-by-Bow
- Blackwall
- Poplar Riverside

The Highway Local Industrial Location was not identified as an area of search due to its close proximity to residential properties and restricted size.

**Site selection process**

The process of identifying suitable sites for a waste management facility was initially undertaken for the Site and Placemaking DPD which has now been merged with the Development Management DPD to form the Managing Development DPD (MD DPD). The site selection process took the Core Strategy areas of search (including the remaining Waste Evidence Base Report (2009) short-list of sites) and applied a set of criteria to them (also defined within the LBTH Site Selection Methodology Note (2011)):

- Aligned to a Core Strategy ‘area of search’;
- Good access (road/rail/water) for waste vehicles;
- Level of complexity of land ownership;
- Environmental considerations;
- Site preparation;
- Potential for local heat network distribution; and
- Potential for co-location / consolidation of waste facilities.

Further criteria were developed from the work of the Council’s Waste Management Team in seeking to identify a site for a potential Council waste management facility, (although it should be noted that these criteria were not applied in absolute terms given they were based on a particular technology and a private waste operator will have greater flexibility):

- A site of between 3 – 3.5 hectares;
- Connection to the Olympic Kings Yard Energy Centre

This criteria further filtered the short-list of sites:

**Fish Island South (Bow Midland Rail Yard)** – This site in south Fish Island was the largest site in single ownership. However, the site was identified to be undeliverable following confirmation by Network Rail of its statutory safeguarding for an essential railhead. In addition to this a number of objections were received from a range of existing businesses and residents during the LDF consultation and engagement period.

The remaining area within Fish Island South is in within multiple ownerships and it would be extremely challenging for the Council to able to demonstrate deliverability for comprehensive redevelopment for a waste facility. Nevertheless, the majority of Fish Island South is within the Strategic Industrial Location (SIL) designation (approximately 9.2ha) and therefore sites within it remain suitable in principle for a waste facility if brought forward by a private developer.
Bromley-by-Bow (Empson Street Strategic Industrial Location) – Following analysis of this site’s land ownership, waste vehicle (HGV) accessibility and likely negative impact on surrounding residential uses, this site was considered to be difficult to deliver in terms of a comprehensive redevelopment for a waste facility. Nevertheless, the area remains SIL (approximately 10.1ha) and therefore sites within it remain suitable in principle for a waste facility if brought forward by a private developer.

Blackwall (Council’s transport depot) – This site is required for the Council’s essential transport services and its size at at 1.87 ha which would prevent the effective delivery of a Council waste facility. As it will remain an operational Council transport depot it cannot come forward as a potential waste site.

Blackwall (Northumberland Wharf) – This site is already safeguarded for waste management as it is currently a licensed waste facility.

Poplar Riverside (Ailsa Street (north)) – this site’s size of 3.2 ha meets the minimum requirement of 3 – 3.5 hectares for a Council waste management facility and has good transport links by road and from the River Lea. Waste management facilities are already operating on the site (including one operated by the Council’s waste management partner, Veolia) and there is a Local Industrial Location directly adjacent to the north. It is not safeguarded for other uses and has the capacity to help provide local heat and power to housing to the west while being separated by the A12. The Council owns a proportion of the land and the remainder of the land is under a limited number of ownerships.

The characteristics of the site identify that, so far, only Ailsa Street has been identified as having the genuine potential to accommodate a waste facility.

Development Management policy
Following the approach of the London Plan (2011), development management policy DM14 within the MD DPD provides guidance to manage the waste apportionment by:

- safeguarding the capacity of existing waste sites, identified on the proposals map, unless it can be demonstrated this capacity can be more efficiently reprovided elsewhere in the borough by supporting development which seeks to maximise their operational efficiency;
- recognising that waste management activities would be a use that is consistent with SIL designation in Fish Island South and Empson Street Strategic Industrial Location
- safeguarding the potential for a future waste management facility at Ailsa Street in accordance with the site allocation. This site will only be able to come forward for alternative uses if it can be demonstrated this will not compromise the ability of the Council to meet its waste apportionment targets;
- supporting other waste management facilities within Strategic Industrial Locations and Local Industrial Locations; and
- working with partners outside of the borough.

The policy provides a ‘plan, monitor and manage’ approach to dealing with the Council’s London Plan waste apportionment target over the Core Strategy Plan Period. It ensures there will always be sufficient land safeguarded for waste to meet the waste apportionment target, whilst providing the potential for the Council and the private sector to provide a more sustainable long term solution to managing the waste produced in the Borough.
Working with partners
A collaborative approach to waste management exists in several other London boroughs and is an approach Tower Hamlets would welcome. In identifying a partner to help manage its waste, Tower Hamlets could more effectively meet its apportionment target and do so through sustainable means.