

WANDSWORTH LOCAL PLAN

EMPLOYMENT AND INDUSTRY REVIEW – POLICY OPTIONS DOCUMENT (OCTOBER 2016)

REPRESENTATIONS ON BEHALF OF THE WESTERN RIVERSIDE WASTE AUTHORITY

Introduction

1. These representations are submitted on behalf of the Western Waste Riverside Authority (WRWA) to the consultation by the London Borough of Wandsworth (LBW) to the Employment and Industry Review – Policy Options Document (October 2016).
2. We introduce the WRWA and provide important background before setting out the WRWA's response to each relevant question.
3. The role of the WRWA, the changes to existing facilities and future operations provide the evidence base and justification to these representations.

WRWA and background information

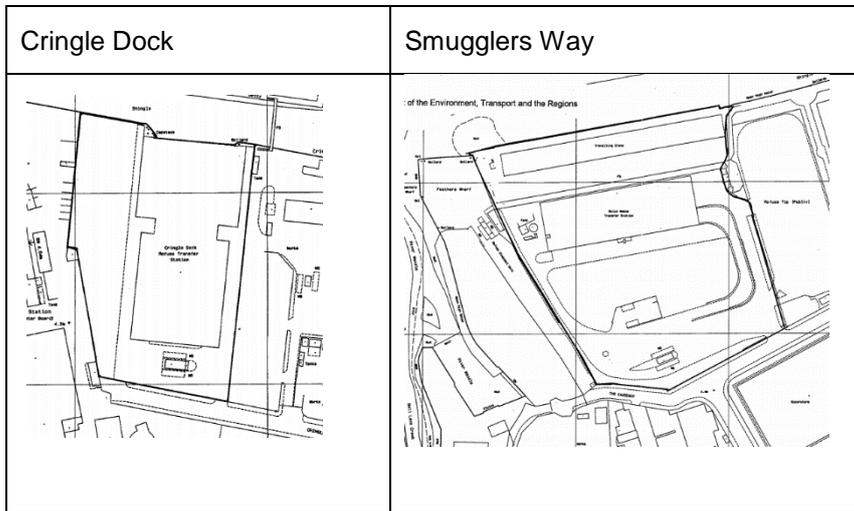
4. The WRWA was established in 1986 as an autonomous statutory local government body to undertake the waste disposal functions prescribed by the Local Government Act 1985 and the Waste Regulations and Disposal (Authorities) Order 1985. WRWA is responsible for managing the waste collected in the London Boroughs of Hammersmith and Fulham, Lambeth, Wandsworth and the Royal Borough of Kensington and Chelsea.
5. WRWA and its constituent councils are responsible for the collection, recycling, composting and treatment of some 391,000 tonnes per annum of household and commercial waste generated within their boundaries. The provision of this service involves a number of different activities that make up the provision of a waste management service.
6. The Authority has pursued a progressive and innovative approach to waste management that is waste minimisation and recycling-led, whilst utilising the River Thames for bulk transportation. Working in cooperation with each other and the private and not-for-profit sectors, the Authority and its constituent councils have focussed on the needs of residents to provide a sustainable waste management service that should set a precedent for future waste management developments in London.
7. In May 2002 WRWA entered into a long-term contract, known as the Waste Management Services Agreement (WMSA), with Cory Environmental Limited (hereafter referred to as Cory). This contract is helping WRWA to realise its aim of maximising reuse and recycling and providing a greener future for management of its waste. The waste management services provided by WRWA and Cory involve waste and recyclable material being delivered to the Authority's two transfer stations, at Smugglers Way in Wandsworth and Cringle Dock in Battersea, for either reuse, recycling or treatment. These are the two main facilities within LBW.
8. Western Riverside Transfer Station at Smugglers Way can handle over 6,500 tonnes of waste and recyclables per week. WRWA's second transfer station, Cringle Dock, is located next to Battersea Power Station and can handle over 6,000 tonnes of waste and recyclables every week. Whereas Smugglers Way uses state-of-the art technology in waste containerisation and operates efficiently and to the highest environmental standards, Cringle Dock is a dated facility which is why its redevelopment has been pursued by the WRWA and we explain more of this later. Cory takes advantage of spare capacity at the transfer stations for the receipt of local trade and commercial waste. WRWA also currently provides an integral Household Waste and Recycling Centre at the Smugglers Way site.

9. WRWA receives co-mingled and separated recyclables at its transfer stations and a Materials Recycling Facility (MRF) was constructed at Smugglers Way in 2010/11, so that most of the separation and baling process is now carried out on site and the baled materials are then transported on to their various market outlets elsewhere in the UK or abroad. Green Waste collected kerbside by the constituent councils and at WRWA's Household Waste and Recycling Centres is bulked at the transfer stations for onward transportation to a number of centralised composting facilities within, or just outside, the London area. All of the waste that cannot be reused or recycled is compacted into containers before being loaded onto barges for their onward river journey.
10. Historically, this was to Cory's landfill site located on the Thames Estuary at Mucking, Essex, but since the completion of the Riverside Resource Recovery Limited's (RRRL) Energy from Waste Facility at Belvedere, in the London Borough of Bexley, the waste has been used for energy recovery and the Authority is now sending "zero waste" direct to landfill and is generating enough electricity to power over 100,000 homes. This Facility will, for decades to come, ensure a secure and environmentally sound treatment method for that portion of waste which cannot be reused or recycled.
11. Cringle Dock and Smugglers Way are one a number of Safeguarded Wharves located on the River Thames allocated for the handling of cargo by barge. Cringle Dock is one of London's key waste infrastructure sites and now transfers around 260,000 tonnes a year, or 5,000 tonnes each week, of 'black bag' waste – an amount equivalent to one quarter of that produced in the whole of Wales – which demonstrates Cringle Dock's importance as a strategic public asset.
12. Cringle Dock has operated as a waste transfer station since 1972 and is protected by planning policies contained in the London Plan 2011 and Wandsworth Council's Core Strategy. These policies require that any development adjacent to a safeguarded wharf must minimise the potential for conflicts of use and disturbance.
13. Recent planning decisions have released industrial sites, such as Battersea Power Station in the Vauxhall Nine Elms Battersea area of London where Cringle Dock is situated, to be redeveloped for mixed residential, commercial, retail and leisure complex uses. The existing waste transfer station at Cringle Dock does not sit comfortably with the new surrounding land uses. The transfer station is over 40 years old and architecturally very much out of keeping with the proposed new developments. Furthermore, the current operational design of the waste transfer station is based around waste storage bunkers; whilst functional, the open air system can, on occasion, emit odour nuisances.
14. Despite its Safeguarded Wharf status, without redevelopment, the arrival of a large number of residents, workers and visitors to the area would undoubtedly have caused issues that could seriously impinge on the operations at Cringle Dock.
15. As a result, since 2012, the Authority had discussed with the owners of Battersea Power Station what could be done to safeguard the long-term operation of Cringle Dock, by improving it operationally and visually and thereby reducing the potential for conflict with its new neighbours and contributing towards the strategic regeneration of the area generally. The outcome of a joint design exercise was a proposal to redevelop Cringle Dock that met future operational waste needs with a design that is both safer and operationally very much more resilient than the current operation. It included the building of residential accommodation facing the Thames with the new Cringle Dock facility below it, which will use modern equipment and processes to continue operations with much greater control over environmental issues.
16. The planning application for the proposed new facility was submitted to LBW in November 2015 and, in February 2016, planning permission was granted.

17. It is anticipated that Cringle Dock will now blend seamlessly into the masterplan for the whole Vauxhall Nine Elms Battersea area whilst continuing to provide a safe and secure waste management solution for the foreseeable future.
18. As part of the changes proposed at Cringle Dock, it is important to understand that WRWA currently operates from the site a bulk waste transfer station (BWTS) which receives and bulks up green waste and recyclables. The facility comprises a combination of open bays and an ageing temporary transfer building. The materials brought to the BWTS are generated by the public delivering bulky waste and recyclables to the Household Waste Recycling Centre at Smugglers Way and by local businesses.
19. However, as a result of the proposed redevelopment of Cringle Dock detailed above, plans for the relocation of the BWTS have now been developed. These proposals involve replacing the Cringle Dock facility with a new modern BTWS at Feathers Wharf, Smugglers Way. This will assist in the logistics of any upgrade or redevelopment of Cringle Dock, by vacating land that could accommodate a temporary waste transfer facility to allow uninterrupted operation of the facility during any works to the existing wharf.
20. Much of the material currently managed at the Cringle Dock BWTS originates from the WRWA Smugglers Way facilities. Moving the facility to Feathers Wharf, Smugglers Way will remove another 2,200 HGV vehicles journeys each year from London's roads. The scheme makes beneficial use of an operational site at Feathers Wharf and provides for effective integration of related operations which have previously been carried out on different sites. The proposed operation will therefore complement the existing waste management functions at the Smugglers Way site, with beneficial utilisation of existing site access and on-site infrastructure (weighbridges, internal roads and traffic control system).
21. In September 2015 a planning application was submitted to LBW to construct a new Bulk Waste Transfer station, to handle up to 25,000 tonnes of recyclable materials, on the southern part of the Feathers Wharf. In February 2016 planning permission was received for an eight year period, commencing on operation.
22. The proposals provide a comprehensive scheme which combines the proposed BTWS with a current temporary permission for plant storage; with each having an independent access and haul road. The whole Feathers Wharf site will be upgraded by providing a new good quality BWTS building together with substantial new landscaping and biodiversity measures as well as a new public riverside walkway.
23. The proposed walkway is an exciting scheme to open up the river easement zone along the River Wandle and the River Thames, as a public walkway. This also involves a significant refurbishment of the existing unused high level walkway which runs along the northern side of the existing Smugglers Way facility. This will connect up the existing riverside walkways to the east and west which will allow the public to walk along the riverside.
24. The waste management contract awarded to Cory runs until 2032 and there is a shortfall between the end of the contract and the end of the temporary planning permission (2024). Although temporary consent was granted, it is likely that the WRWA will continue to have an operational need for this land beyond 2024 as part of its statutory duty to provide waste management services across the four boroughs.

Safeguarded Wharves

25. As noted, both Cringle Dock and Smugglers Way are Protected Wharves. The boundaries of each are identified on the plans below:



26. Safeguarding policy transferred to the Mayor of London from the Secretary of State in 2000. The Mayor reviewed the original 1997 list of wharves in conjunction with the Port of London Authority (PLA) and concluded that Cringle Dock and Smugglers Way should retain their protected status. No changes were made to the boundary of either.
27. The requirement is to refer any proposed planning approval within the defined boundary to the Mayor.
28. The Mayor undertook a review of protected wharves in 2011/2013. In respect of Smugglers Wharf, the recommendation was that:
- “Retain – Site is in active use, with dedicated infrastructure to serve the current user. GLA and PLA consider working with relevant stakeholders, including the waste authority and operator, to explore options for increasing the use of river transport for materials, including recyclates, through this site.”*
29. In respect of Cringle Dock, the recommendation was that:
- “Retain – Site is in active use, within specialist infrastructure, which enables the waste transfer activities to take place in a covered dock. GLA and PLA are working with relevant stakeholders, including the Council and local developers, to ensure that the redevelopment of the wider Battersea/Nine Elms areas provides a suitable road network to service this wharf and does not reduce the viability of the site as a river freight wharf. In February 2013 Thames Water submitted a Decision Consent Order to the Planning Inspectorate which included an application for the neighbouring Kirtling Wharf site as a construction site for the Thames Tideway Tunnel. Navigational access will need to be maintained during the construction period.”*

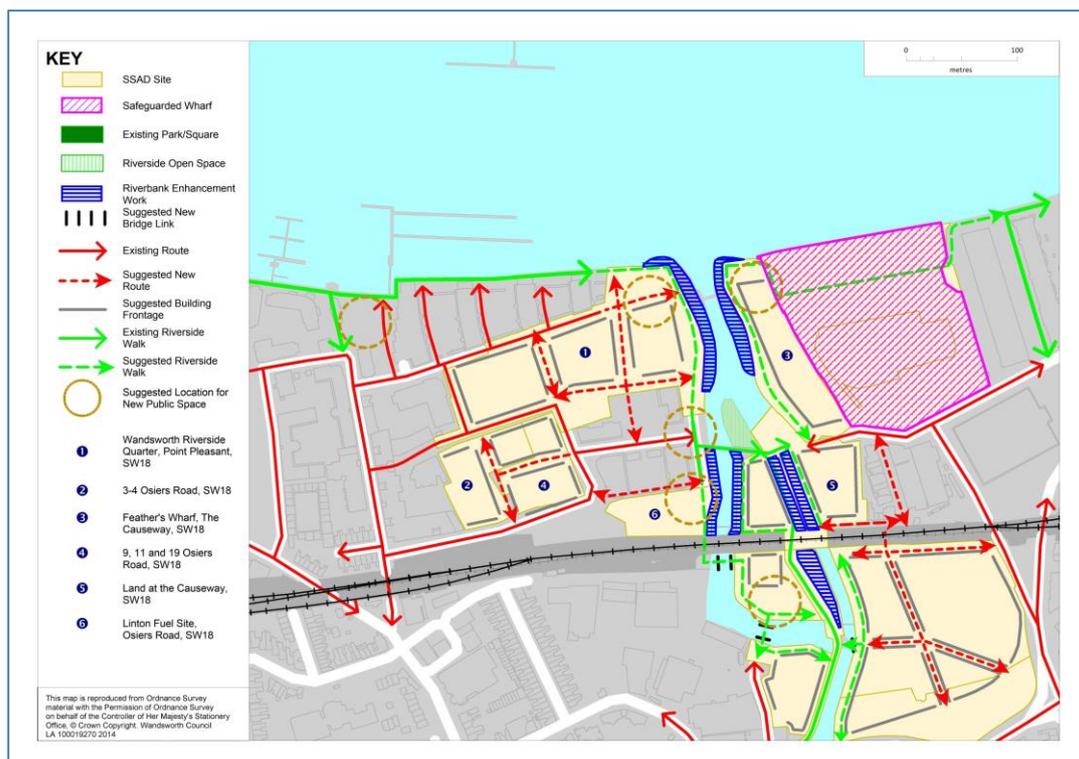
WRWA Waste Management Policy

30. The WRWA's Waste Management Policy objectives are to:
- embrace the concepts of waste prevention;
 - seek to achieve a sustained reduction in the amount of waste arising;
 - minimise the use of landfill;
 - increase, as far as is practicably possible, the amount of waste that is reused, recycled and composted;
 - recover energy from waste that cannot be recycled or composted;
 - maximise the use of sustainable river transport;
 - assist in achieving regional self sufficiency for the London area;
 - minimise disruption to others and involve a “good neighbour” approach to the management of waste facilities; and
 - represent all round Best Value for the local community without excessive cost.
31. In pursuit of these objectives, as noted, Cory's contract runs to 2032.

Response to 8.4.4 Area Spatial Strategies and Site Allocations

32. The WRWA questions whether a public space (see Map 8.8 reproduced below) on Feathers Wharf, immediately adjacent to a waste transfer station and Safeguarded Wharf, is appropriate. A river walk, where people pass through, is a very different environment to a public space which might lead to unreasonable expectations for peace and quiet which are most unlikely to be met on land next to an operational facility.
33. Therefore, for these reasons, the WRWA would respond No and Yes to Question 33 “Do the proposed routes and spaces set out in the adopted Area Spatial Strategy give the optimal arrangement for the area? Are there alternative approaches that should be explored?”

Map 8.8 Adopted Area Spatial Strategy for Wandle Delta, Land North of the Railway



Response to 8.9 E19 (Waste and Wharves)

34. The draft notes that waste apportionments are likely to be revised in the forthcoming review of the London Plan, as is the safeguarding of wharves, and it is therefore suggested by LBW that it is considered appropriate to review the Local Plan approach to waste and wharves as part of the forthcoming full Local Plan review rather than this partial review (para 8.97).
35. WRWA notes that part of the justification for this is a reference to the ongoing consultation exercise to the London Plan (A City for All Londoners, October 2016). However the GLA do not reference a review of protected wharves within the consultation document and there is no commitment to this, and therefore it would be a missed opportunity if LBW does not take the opportunity now to review the extent, role and function of waste management facilities within the borough linked to the ongoing wider regeneration of the Vauxhall Nine Elms Battersea and Wandle Delta areas.
36. As we have explained, there have been important changes to facilities and operations at Smugglers Way and Cringle Dock, and with the WRWA's ongoing commitment to waste management across all 4 boroughs, it is appropriate to run the reviews concurrently. It must be the case that the opportunity is taken to review planning policy and allocations in LBW that could impact on the WRWA's ability to perform its statutory duty.
37. In response to the questions set out in the document, the WRWA responds as follows:
Question 63 – should policies DMI5, DMI6 and DMI7 retain the current wording and be reviewed as part of the full Local Plan review rather than this partial review
38. The WRWA proposes that the review should happen now. Whilst Core Strategy Policy PL 10 sets out the need for land to be reserved for the Borough's future waste management needs, the WRWA is concerned that other planning decisions relating to development plan documents and individual planning applications would appear to be undermining Policy PL 10, and therefore the WRWA considers there to be a need for the review to be completed now.
39. As indicated, the WRWA is committed to serving the needs of the borough and has placed a contract for waste management until 2032. Given the pressures for housing development and the implications for future operations, in particular at Smugglers Way, the WRWA considers it essential that there is a review of policy and that it happens in full and now.
Question 64 – should the sites allocated for waste management be retained, as set out in the adopted SSAD?
40. The WRWA proposed that the sites should be retained, but there should be a review of the boundary of the extent of the facilities. It is acknowledged that this is a matter for the GLA to lead on, however given the changes around Cringle Dock and Smugglers Way arising from decisions being made on planning applications and development plan documents, it is right that LBW considers this now.
Question 65 – should the policy approach to wharves and the existing safeguarding allocations of the borough's wharves be retained in line with the existing policy approach, and reviewed as part of the full Local Plan review
41. In light of the WRWA's response to Questions 63 & 64, the WRWA proposes that the review should take place now.
42. Finally, the WRWA confirms its availability to meet the policy team to discuss further these representations.