ITEM 4

Paper No. WRWA 22-02

WESTERN RIVERSIDE WASTE AUTHORITY

MEETING	25th January 2022
REPORT AUTHOR/DATE	General Manager *(Contact Mark Broxup - Tel. 020 8871 2788)* 17th January 2022
SUBJECT	A Report outlining progress with operations and other matters since the previous meeting of the Authority.
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STATUS	Open
BACKGROUND PAPERS	None

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EXECUTIVE SUMMARY

1. This paper brings Members up to date on operational and other matters, which, in themselves, do not warrant the production of a separate paper. The majority of these matters are for Members' information, but where approval is sought this is referred to in the report and summarised at the end. The specific matters covered in this report are:-

    a) Operations
    b) Performance Monitoring
    c) Education Programme
    d) Plastics
    e) Environment Act 2021
    f) DEFRA Waste Statistics
    g) Constituent Council New Recycling Initiatives
    h) Recruitment of the Deputy General Manager and Assistant General Manager
    i) Role of Treasurer
    j) Planning
    k) Items costing between £5,000 and £30,000
    l) Comments of the Treasurer

OPERATIONS

2. There has been no major disruption in service to the main Transfer Station operations since the last Authority meeting. Cory, and its contractors, have experienced some problems deploying full staff complements due to a variety of issues including: the shortage of lorry drivers and non-skilled staff across the economy as a whole and the impact of the Omicron variant of Covid-19. However, the Services have been maintained and it is hoped that these matters will ease during the course of 2022.

PERFORMANCE MONITORING

Introduction

3. Detailed tonnage tables are attached as Appendix A to this report. The modelling to forecast the outturn figures for 2020/21 compares performance against the corresponding period in the previous year. Due to the disruption caused by the impact of Covid-19 in 2020/21, the forecasts should be treated with caution. This particularly applies to the “WRWA” tonnage which is principally waste from the

Household Waste and Recycling Centre that was closed for six weeks at the beginning of the 2020/21 financial year. The tables shown set out:

a) the tonnages of each waste type (including co-mingled recycling contamination) delivered by each constituent council in the current financial year up to 30th November 2021, together with projected outturn tonnages, compared against those budgeted for and the previous financial year's outturn; and

b) comparisons of the tonnage of each major waste type handled by each constituent council on an annual basis.

Points to Highlight

4. From tonnage data up to 30th November 2021, officers are predicting a 0.98% increase in total waste handled by the Authority in 2021/22 compared to 2020/21. Kensington and Chelsea are predicted to have the biggest increase in total waste at 13.56%, due to the large drop it experienced in 2020/21 as a result of the impact of Covid-19 but its tonnages are still well below those in the years prior to 2020/21.

5. The predictions for General Waste delivered, when compared to 2020/21, vary across the constituent councils; small increases are predicted for Wandsworth at 0.04% and Hammersmith & Fulham at 0.83% whilst a substantial increase of 15.08% is predicted for Kensington and Chelsea with a decrease of -0.67% for Lambeth. The tonnages for Hammersmith & Fulham and Lambeth are broadly comparable with the years prior to 2020/21 whilst Kensington and Chelsea's are significantly down and Wandsworth's significantly up.

6. The forecast tonnages of Co-Mingled recycling delivered, compared to 2020/21, also vary across the four boroughs, with decreases for Hammersmith & Fulham at -1.43%, Lambeth at -3.24% and Wandsworth at -4.07% whilst an increase is forecast for Kensington and Chelsea at 12.14%.

PLASTICS

7. Officers have been having discussions with Cory on the carbon impact of plastic at the Belvedere Energy from Waste (**"EfW"**) Facility where plastics represent 67% of the fossil carbon emissions from the Facility whilst only representing 15% of the waste processed by weight.

8. There is a common misconception that EfW Operators, like Cory, want plastic in their facilities due to its high calorific value (it represents around 30% of the calorific value of the residual municipal waste) but this is not true. Burning plastic creates several corrosive gases that significantly increase EfW maintenance and operational costs including the cleansing of exhaust gases. The introduction of greater volumes of a less damaging lower calorific waste stream, with lower associated costs and increased gate fee income will outweigh any displaced energy revenue.

9. The best way to reduce the plastic content in waste is to reduce the amount of plastic produced and consumed, and to ensure plastic waste does not enter the residual waste stream in the first place. The Environment Act 2021 (see paragraphs 20 to 28 below) and the Plastics Packaging Tax being introduced in April 2022 should lead to less plastics being produced, more plastics being recycled and, ultimately, less plastic ending up in residual waste. Cory is closely tracking progress on technology to pre-sort waste before it is processed in an EfW facility although to date these have not proven to be successful, due to the poor quality of materials separated for potential recycling and they will never be as desirable as reducing plastic waste in the first place or separating it before it reaches the residual waste stream.

10. Attached at Appendix B is a draft plan of how Cory and the Authority might jointly approach a communications campaign on plastics and the Authority is asked to endorse this plan and instruct officers to work with Cory to refine and begin to deliver it with progress being reported to a future Authority meeting.

EDUCATION PROGRAMME

11. The Education Team are currently running with two staff vacancies. The two vacant positions will be filled during the course of 2022.

12. The on-site school visits at Smugglers Way recommenced in September 2021 and continued until 8th December 2022, when Authority officers were notified by Cory that, due to the rapidly increasing cases of the Omicron variant, non-essential visitors to the site, will no longer be permitted.

13. Prior to the cessation of visits, the two Education Officers undertook 27 on-site school tours and 10 business or community group on-site tours. The Team also undertook 23 online workshops for schools.

14. The Education Team are now focussing on online work and will continue to do so until the end of January 2022, when Cory will be reviewing their policy on visitors to the site. In the interim, the Education Room is being used to assist Cory with the social distancing of MRF workers during their breaks.

WRWA COMMUNICATIONS

15. At the Authority meeting on 23rd January 2020 (Paper WRWA 20-05), it was agreed that, from 1st April 2020, the Authority should run its own communications campaigns on areas directly affecting the Authority's business via social media and at the Household Waste and Recycling Centre (HWRC).

16. In 2021/22 so far, the Authority's website and social media platforms have largely been used to highlight the introduction of the Booking System, promote the Education Programme, continue to support the 'Take Charge +' battery fire awareness campaign and provide appropriate Covid messaging.

Communication plan – Financial year 2022/2023

17. It is proposed to continue with "What Happens to my Recycling" campaign in Financial Year 2022/23, using social media, and to focus attention on increasing Reuse and Recycling at the HWRC. If Members approve the draft Plastics Plan, detailed in paragraphs 7-10 above, it is proposed that this will be a new campaign for 2022/23.

18. It is also proposed to keep in place a £25,000 budget for any campaigns that may be appropriate to the Government's plans to introduce new waste management legislation covering matters such as compulsory food and garden waste collections, a deposit return scheme and extended producer responsibility for packaging. This budget, if required, will be funded from the Recycling Reserve which currently has a balance of £250,000.

Work Stream	Annual Budget	New Waste Management Requirements Budget, if required	Total
Social Media advertising – using paid-for targeted posts (by location) on Facebook, Nextdoor and Twitter	£5,000		
A design budget for all electronic adverts, posts and communications material at the HWRC	£10,000		
Communications relating to increasing Reuse and Recycling at the HWRC.	£5,000		

Social media advertising and communication materials – Cory/WRWA joint Plastics campaign	£5,000		
A budget for any new Waste Management requirements, if required for innovation, special projects or new engagement methods.		£20,000	
Total	£25,000	£20,000	£45,000

19. Members are requested to approve the proposed communications budget of £45,000 for Financial year 2022/23, which remains at the same level compared to the Financial year 2021/22 budget.

ENVIRONMENT ACT 2021

20. The Environment Act 2021 (**the "Act"**) received Royal Assent on 9th November 2021. It is a far-reaching piece of legislation covering much of today's green agenda and Part 3 of the Act introduces a number of important changes including measures to reduce packaging waste, to encourage re-use and recycling and change to the way waste is collected.

Extended Producer Responsibility

21. Extended Producer Responsibility (**"EPR"**) aims to incentivise producers (the brand, packer filler or importer) through the fees they will be required to pay to ensure that packaging products placed on the market are recyclable and that any unnecessary packaging material is reduced (this includes minimising packaging and using refillable or reusable packaging).

22. A new organisation will operate and manage the EPR scheme with fees collected from producers being passed onto local authorities to reimburse their full net cost of end of life collection of packaging and its treatment (i.e. recycling, recovery or disposal). The EPR is expected to be implemented in 2023/2024.

Deposit Return Scheme

23. The Act provides a framework in Schedule 8 for what a Deposit Return Scheme (**"DRS"**) will look like, and further details are to be introduced in due course by Regulations. Currently it would appear that a DRS is unlikely to be in force in England before 2024.

24. If a DRS is introduced and is successful, then it may help reduce littering by introducing a financial incentive for drinks containers to be returned for recycling at retail outlets. It is hoped that it will lead to greater public awareness on waste matters generally and other positive waste management behaviour change.

25. A DRS would also reduce the amount of recyclable material collected at the kerbside by local authorities and this could have positive or negative effect in terms of cost and income for different local authorities and might potentially trigger contractual change in law provisions.

Consistent Collections

26. The Environmental Protection Act 1990 contains the basic duties of waste collection authorities to collect household waste and over time this has been amended to require separate collections of recyclable waste. The Act allows for these provisions to be further amended by Regulation to provide more detailed requirements of what recyclables must be collected separately and which recyclables can be collected co-mingled. For these purposes the relevant recyclable waste streams are:

    - glass;
    - metal;
    - plastic;
    - paper and card;
    - food waste; and
    - garden waste.

27. The main difference is the introduction of a new duty to carry out a separate weekly collection of food waste not only separately from general waste, but also from dry recyclables. All these new duties remain suspended until the introduction of new Regulations.

New Burdens

28. In September 2021, in "Policy paper: Waste and resource efficiency factsheet (part 3)" in relation to the Act, whilst it was nearing the end of its stage as a Bill in Parliament, the Government stated that:

    "We will fully fund all new burdens on local authorities arising from the Bill.

    The government recognises the financial pressures local authorities face and will ensure that costs arising from new statutory duties such as those proposed in the Bill are covered.

The changes will mean that local authorities will be collecting more materials for recycling which may mean additional equipment – such as food waste bins for householders. We will allow local authorities sufficient time to adapt to their new duties and to communicate changes with householders."

DEFRA WASTE STATISTICS

29. On 15th December 2021, the Department for Environment, Food and Rural Affairs published its annual league tables of the total household waste recycling, composting and reuses rate for English local authorities for 2020/21.

30. The headline figure that tends to get reported in the press is the overall recycling rate which was headed this year by St Albans City and District council at 64.2%, made up of Green Waste at 35.7% and Dry Recycling at 28.5% with Barrow-in-Furness Borough Council at the bottom with an overall recycling rate of 17.9% made up of Green Waste at 8.4% and Dry Recycling at 9.4%. For comparison the rates achieved by the Authority and its constituent councils are shown in Table 1 below. The Authority and its constituent councils will never do well in this comparison due to the dense urban nature of our area meaning that there is simply very little garden waste available to recycle but, as Table 1 shows, Lambeth's Dry Recycling performance (despite its large proportion of high rise properties) is only 1.9 % lower than that of St. Albans, and Lambeth also recorded the fourth highest increase in recycling of 4.7 percentage points from 2019/20. Indeed, if we rank performance by the Dry Recycling rate, we can see from Table 2 overleaf that the Authority and the constituent councils perform much better in comparison with other local authorities.

Table 1

Local Authority	Overall Recycling Rate	Rank out of 338 local authorities	Green Waste Recycling Rate	Dry Recycling Rate
St Albans City and District Council	64.2%	1	35.7%	28.5%
Lambeth	36.4%	236	9.8%	26.6%
Hammersmith & Fulham	27.5%	315	2.4%	25.1%
WRWA	26.8%	320	4.4%	22.4%
Wandsworth	24.2%	330	2.3%	21.9%
Kensington and Chelsea	24.2%	329	3.7%	20.5%
Barrow-in-Furness	17.9%	338	8.4%	9.4%

Table 2

Local Authority	Dry Recycling Rate	Rank out of 338 local authorities	Green Waste Recycling Rate	Overall Recycling Rate
South Gloucestershire Council	34.6%	1	24.0%	58.5%
Lambeth	26.6%	74	9.8%	36.4%
Hammersmith & Fulham	25.1%	113	2.4%	27.5%
WRWA	22.4%	197	4.4%	26.8%
Wandsworth	21.9%	215	2.3%	24.2%
Kensington and Chelsea	20.5%	257	3.7%	24.2%
Chelmsford Borough Council	9.2%	338	31.9%	41.1%

31. Also Table 3 below ranks each of the thirty three London collection authorities on their Dry Recycling Rate percentage and again it can be seen that the Authority's constituent councils all generally perform well given their central location.

Table 3

London Collection Authority	Dry Recycling Rate	Rank out of 33 London local authorities	Green Waste Recycling Rate	Overall Recycling Rate
Ealing	34.3%	1	14.6%	49.0%
Bexley	30.9%	2	19.1%	50.0%
Royal Borough of Kingston upon Thames	28.0%	3	19.5%	47.6%
Richmond upon Thames	26.8%	4	13.6%	40.4%
Lambeth	26.6%	5	9.8%	36.4%
Merton	25.7%	6	15.2%	40.8%
Hammersmith and Fulham	25.1%	7	2.4%	27.5%
Croydon	25.1%	8	16.2%	41.3%
Southwark	24.8%	9	7.6%	32.5%
City of London	24.8%	10	5.5%	30.3%
Sutton	24.7%	11	21.4%	46.1%
Islington	23.6%	12	7.7%	31.3%
Westminster City Council	23.1%	13	0.8%	23.9%
Bromley	22.7%	14	22.1%	44.8%
Haringey	22.5%	15	8.6%	31.0%
Wandsworth	21.9%	16	2.3%	24.2%
Hounslow	21.5%	17	13.9%	35.4%

Brent	21.2%	18	12.2%	33.4%
Barnet	20.8%	19	8.2%	28.9%
Hackney	20.6%	20	7.5%	28.1%
Royal Borough of Kensington and Chelsea	20.5%	21	3.7%	24.2%
Camden	20.5%	22	8.1%	28.6%
Havering	20.0%	23	14.7%	34.7%
Waltham Forest	19.7%	24	12.2%	31.9%
Harrow	18.9%	25	16.9%	35.8%
Hillingdon	18.7%	26	18.6%	37.3%
Greenwich	17.9%	27	13.6%	31.5%
Newham	17.5%	28	3.4%	20.9%
Barking and Dagenham	17.3%	29	9.6%	26.9%
Tower Hamlets	17.0%	30	2.3%	19.3%
Enfield	16.6%	31	16.6%	33.2%
Redbridge	16.4%	32	9.0%	25.4%
Lewisham	16.3%	33	12.1%	28.3%

32. Whilst recycling performance is important it is not the only measure of performance and, given that waste minimisation is at the top of the waste hierarchy, an interesting comparison is the average weight of household waste generated per person in each local authority, see Table 4 below. London authorities, including the Authority and its constituent councils, tend to do well against this measure, in part, due to their lack of Garden Waste, but as Table 5 overleaf shows, the boroughs also do well in terms of the amount of residual waste collected per household for disposal.

Table 4

Local Authority	Collected household waste per person (kg) (Ex BVPI 84a)	Rank out of 338 local authorities	Dry Recycling Rate	Green Waste Recycling Rate	Overall Recycling Rate
LB Camden	186.0	1	34.6%	24.0%	58.5%
Lambeth	237.9	4	26.6%	9.8%	36.4%
Hammersmith & Fulham	247.4	5	25.1%	2.4%	27.5%
WRWA	289.3	9	22.4%	4.4%	26.8%
Kensington and Chelsea	306.2	13	20.5%	3.7%	24.2%
Wandsworth	312.9	16	21.9%	2.3%	24.2%
Council of the Isles of Scilly	589.7	338	26.5%	9.3%	35.9%

Table 5

Local Authority	Residual household waste per household (kg/hh) (Ex NI191)	Rank out of 338 local authorities	Dry Recycling Rate	Green Waste Recycling Rate	Overall Recycling Rate
East Devon District Council	269.4	1	31.4%	28.7%	60.0%
Lambeth	333.2	9	26.6%	9.8%	36.4%
Hammersmith & Fulham	359.9	19	25.1%	2.4%	27.5%
Kensington and Chelsea	407.4	44	20.5%	3.7%	24.2%
WRWA	441.7	77	22.4%	4.4%	26.8%
Wandsworth	525.4	186	21.9%	2.3%	24.2%
Barking and Dagenham	850.0	338	17.3%	9.6%	26.9%

CONSTITUENT COUNCIL NEW RECYCLING INITIATIVES

33. At the meeting of the Authority on 22nd September 2010 (Paper No. WRWA 669A) Members instructed the Clerk to write to each of the constituent councils to inform them that, in future, should they wish to make arrangements themselves to recycle any significant tonnage of waste then, in accordance with Section 48 of the Environment Protection Act 1990, they must, as soon as reasonably practicable, notify the Authority in writing. The Authority will then approve or object to any such proposal at its next available meeting. The Clerk wrote to the constituent councils, as instructed, on 27th October 2010.

34. The constituent councils have not notified the Authority of any new initiatives since the previous Authority meeting.

RECRUITMENT OF DEPUTY GENERAL MANAGER AND ASSISTANT GENERAL MANAGER

35. As reported to the previous meeting of the Authority (Paper No. WRWA 21-25) six candidates were invited to a first technical interview for the DGM position on 15th November 2021. Two candidates withdrew and, from the four interviewed, two were taken through to a second interview on 6th December 2021.

36. The successful candidate was Ms Andrea Keys who is currently the Interim Strategic Manager at the South London Waste Partnership (the **"SLWP"**) and will be joining the Authority on 28th March 2022 following her notice period.

37. Ms Keys has worked for the SLWP since 2014 overseeing a portfolio of contracts worth in excess of £60m per annum. Prior to that she worked with Suez Recycling and Recovery Limited for seven years as a commercial bid manager, so she is extremely experienced in contract procurement from both a public and a private sector perspective. She has extensive strategic planning experience and a proven ability to translate those strategies into deliverable plans and is also a Prince2 Practitioner in project management.

38. As reported to the previous meeting, it was not felt that any of the applicants for the role of Assistant General Manager (**"AGM"**) were suitable and it was decided to pause and reassess the AGM recruitment process and to provide an update to this meeting.

39. Whilst the new DGM will need to become familiar with the day-to-day workings of the Authority and how the service requirements within the current contract arrangements are monitored, her priorities are to be very much focussed on the Authority's future arrangements. Following discussions with the Clerk and Treasurer, it is now recommended that the Authority look instead to promote from within its existing ranks and to recruit at a more junior level to provide a staffing structure that provides greater resilience and flexibility.

40. The Authority is therefore recommended to approve the proposed structure shown in Appendix C to this report which also shows the current structure for reference.

41. It is proposed that Ms Frances Devane who has a wide-ranging knowledge of the Authority's operations be promoted to the role of AGM, with her current post of Executive Officer being deleted. It is anticipated that Operation Manager's position will be regraded upwards to a PO4/PO5 position following a formal job evaluation. The new assistant roles will also need to be formally job evaluated but it is expected that they will be around Scale 5.

42. In essence the proposed structure replaces an existing PO4 post with two Scale 5 posts and increases an existing PO3 post to PO4/PO5 which would represent an overall salary increase of around £15,000 per annum compared to the current approved structure.

ROLE OF TREASURER

43. The Authority resolved at its meeting in September 2020 (Paper No. WRWA 20-23) to approve that the employment of the Treasurer (Mr Buss) be extended until 30th September 2022 by which time the 2021/22 accounts and audit ought to have been concluded.

44. Mr Buss has expressed his willingness for this arrangement to be extended by just over a year until 30th November 2023 if the Authority is agreeable. It is recommended that the Authority accept Mr Buss's proposal and that it also agrees to the commencement of a recruitment exercise for a replacement Treasurer in early 2023 so that Mr Buss may help advise the Authority on the appointment of his successor and any changes to the Authority's existing financial arrangements that might be necessary as a consequence.

45. A full paper will be presented to the January 2023 meeting of the Authority, but it is envisaged that the recruitment process would first ask if any of the constituent councils wished to propose one of their own officers for the post and for the related finance functions currently carried out by Wandsworth Council under a Service Level Agreement. As previously explained to the Authority in Paper No. WRWA 20-23, the role of the Treasurer is closely linked to the provision of a wider suite of financial services. If this process should fail to identify a suitable candidate for Treasurer, then the Authority would advertise the role externally.

PLANNING MATTERS

Former B&Q Retail Site

46. Legal and General has submitted an amendment (Wandsworth Council planning reference 2021/5004) to its current planning permission for the redevelopment of the former B&Q Retail Warehouse site. The amendment comprises of an increase of 78 homes from 335 to 413 homes delivered through an increase of two storeys to Buildings A3, A4, C1, C2 and C3 and an increase in 4 storeys to building A1 and A2.

47. Carter Jonas has submitted the response, attached as Appendix D to this report objecting to the additional height of Buildings A1-A4 which lie adjacent to the Transfer Station as the proposed massing could prejudice the future redevelopment of the Authority's site, as well as the neighbouring allocated Feathers/institute Wharf sites, for residential or mixed-use development by means of overshadowing, and daylight and sunlight issues. The response, which the Authority is asked to endorse, proposes that the massing should be reduced

at this point, subject to further consideration of daylight and sunlight, to safeguard the development potential of its own site.

Wandle Delta Masterplan

48. Following a public consultation on 28th September 2021 Wandsworth Council adopted its Wandle Delta Masterplan (the **"Masterplan"**) as a Supplementary Planning Document (**"SPD"**) for the area. SPDs are non-statutory documents but they provide guidance on how policies or proposals set out in the adopted Local Plan Documents will be implemented and are a material consideration in decision-making on planning applications.

49. The Masterplan has identified all the Council owned land at Feathers Wharf and over half of the Authority owned land at Institute Wharf as being a proposed major green space, please see Figure 2 below.

Figure 2



50. The Masterplan has therefore ignored the representation made by the Authority, which is reproduced below:

"Figures 24 and 25 of the draft SPD identify proposed new green space on the Feathers Wharf site and public realm running through the WRWTS site (sites 9 and 10). Whilst the importance of the vision of high-quality public realm and landscaping in the SPD area is recognised and supported, WRWA considers that the full, potential and quality of the public realm and landscaping in the SPD area cannot be realised without considering the full WRWA land ownership in the area. As discussed above, the full WRWA land ownership should be allocated within the Local Plan and accordingly identified within the draft SPD. This will

provide the greatest opportunity and flexibility for the comprehensive mixed-use regeneration of the masterplan area and in turn allow for a high-quality public realm and landscaping strategy to be developed. The proposed new green space that is identified on the Feathers Wharf site and public realm running through the WRWTS site (sites 7, 9 and 10), will only be possible if the full extent of the WRWA land ownership is taken into consideration in the wider masterplan proposals, therefore, this should be reiterated in the SPD".

51. In response to this unhelpful development, it is recommended that the Authority instruct its officers to:

    a. arrange discussions with the Council to ensure that all its departments are "joined up" in respect of the opportunities that Feathers and Institute Wharves provide; and

    b. submit further detailed representations on the draft Local Plan (see paragraph 51 below) to emphasise that the redevelopment of the combined Feathers/Institute Wharf sites needs to be clearly focussed on mixed-use development albeit with some open space by the mouth of the Wandle.

Wandsworth Local Plan

52. Whilst the SPD is an illustrative/schematic document the Local Plan is more detailed in nature and on 10th January 2022, Wandsworth Council announced that it is consulting on the 'Publication' version of its Local Plan which sets out the Council's vision and spatial strategy to guide the development of the borough from 2023, when the Plan is anticipated to be adopted, to 2038.

53. The Local Plan is supported by key objectives for the borough, planning policies, area strategies and – at the smallest scale – guidance for the development of specific sites. Collectively, these identify where development should be targeted and set out how the borough's neighbourhoods and places will change over the next fifteen years.

54. Officers, with the assistance of Carter Jonas, will submit representations on the Local Plan in line with those approved previously by the Authority and incorporating the point highlighted in paragraph 9b above.

ITEMS COSTING BETWEEN £5,000 AND £30,000

55. There have been no items of expenditure that have been authorised by officers under delegated powers which fall within the band range of £5,000 to £30,000 since the last Authority meeting.

COMMENTS OF THE TREASURER

56. The Treasurer advises that as outlined in the Budget paper (Paper No. WRWA 22-03) elsewhere on this agenda, constituent councils are advised to make their own assumptions regarding tonnage levels when setting their budgets. The budget paper incorporates the latest information and estimates where possible. The Budget also incorporates the costs of the plastics campaign and the revised staffing structure as referred to in paragraphs 7 to 10 and 38 to 41 above respectively.

57. With regard to the Environment Act 2021, no provision has been made within the budget for any immediate costs arising from its implementation or any income assumed from Government support for new initiatives and any costs arising will, in the first case, be met from the general fund reserve.

RECOMMENDATIONS

58. It is recommended that the Authority:

    a. endorse the draft plan, attached as Appendix B to this report, of how Cory and the Authority might approach a joint communications campaign on plastics and instruct officers to work with Cory to refine and begin to deliver it with progress being reported to a future Authority meeting;

    b. approve the new staffing plan as described in paragraphs 39 to 42 above;

    c. agree an extension to Mr Buss's employment as Treasurer until 30th November 2023 and the process to appoint his replacement as described in paragraphs 43 to 45 above;

    d. instruct officers to action the points outlined in paragraph 50 above with respect to the Wandle Delta Masterplan; and

    e. otherwise receive this report as information.

M. Broxup
GENERAL MANAGER

Western Riverside Administration Office
Smugglers Way
Wandsworth
SW18 1JS

17th January 2022

After 8 months of 2021/2022

General Waste Delivered (Tonnes)

	2017/2018	2018/2019	2019/2020	2020/2021	TO DATE 2021/2022	FORECAST 2021/2022	Annual Change Tonnes	Annual Change Percent	2021/2022 Budget Tonnes	Budget Change Tonnes	Budget Change Percent
HF	58,478	57,772	56,021	55,590	37,915	56,074	485	0.87%	55,614	460	0.83%
KC	59,730	59,581	58,209	46,755	36,284	53,537	6,782	14.50%	46,521	7,016	15.08%
LA	89,451	89,226	86,536	88,694	59,488	88,125	-569	-0.64%	88,722	-597	-0.67%
WA	77,251	76,028	75,666	80,509	53,671	80,119	-390	-0.48%	80,090	29	0.04%
WRWA	10,749	9,713	8,865	9,504	5,735	8,517	-987	-10.38%	8,831	-314	-3.55%
Total	295,660	292,321	285,298	281,052	193,094	286,372	5,321	1.89%	279,778	6,594	2.36%
Change		-3,339	-7,023	-4,247		5,321					
Percentage Change		-1.13%	-2.40%	-1.49%		1.89%					

Co-Mingled Waste Delivered (Tonnes)

	2017/2018	2018/2019	2019/2020	2020/2021	TO DATE 2021/2022	FORECAST 2021/2022	Annual Change Tonnes	Annual Change Percent	2021/2022 Budget Tonnes	Budget Change Tonnes	Budget Change Percent
HF	11,305	11,146	11,703	12,573	8,123	12,394	-179	-1.43%	12,469	-74	-0.60%
KC	15,889	16,087	15,961	12,528	9,399	14,049	1,521	12.14%	12,464	1,585	12.72%
LA	19,902	19,858	19,543	22,317	13,960	21,588	-729	-3.27%	22,135	-547	-2.47%
WA	19,900	20,173	20,355	23,577	14,546	22,618	-958	-4.07%	23,437	-819	-3.50%
WRWA	437	601	538	373	296	529	156	41.75%	296	233	78.66%
Total	67,433	67,864	68,099	71,368	46,323	71,178	-190	-0.27%	70,800	378	0.53%
Change		431	235	3,269		-190					
Percentage Change		0.64%	0.35%	4.80%		-0.27%					

Co-Mingled Contamination (Percentage)

	2017/2018	2018/2019	2019/2020	2020/2021	TO DATE 2021/2022	FORECAST 2021/2022	Change in Percentage Point
HF	14.09%	15.19%	13.62%	13.93%	16.12%	16.12%	2.19%
KC	12.23%	11.66%	10.64%	11.03%	10.82%	10.82%	-0.21%
LA	16.46%	16.40%	14.31%	14.49%	16.30%	16.30%	1.81%
WA	14.80%	14.14%	12.78%	13.49%	14.16%	14.16%	0.66%
WRWA	14.59%	14.57%	12.84%	13.90%	14.45%	14.45%	0.54%

Co-Mingled Contamination (Tonnes)

	2017/2018	2018/2019	2019/2020	2020/2021	TO DATE 2021/2022	FORECAST 2021/2022	Annual Change Tonnes	Annual Change Percent	2017/2018 Budget Percentage	2021/2022 Budget Tonnes	Budget Change Tonnes	Budget Change Percent
HF	1,593	1,693	1,594	1,752	1,310	1,998	246	14.06%	13.1%	1,632	366	22.45%
KC	1,943	1,875	1,699	1,382	1,017	1,521	139	10.05%	11.2%	1,390	131	9.41%
LA	3,276	3,257	2,796	3,233	2,275	3,518	286	8.84%	14.3%	3,163	356	11.25%
WA	2,946	2,852	2,602	3,181	2,059	3,202	21	0.65%	12.9%	3,012	190	6.29%
WRWA	64	88	69	52	43	76	25	47.30%	13.6%	40	36	89.13%
Total	9,821	9,764	8,760	9,600	6,704	10,316	716	7.46%	13.0%	9,237	1,079	11.68%
Change		-57	-1,005	840		716						
Percentage Change		-0.58%	-10.29%	9.59%		7.46%						

Green Waste Delivered (Tonnes)

	2017/2018	2018/2019	2019/2020	2020/2021	TO DATE 2021/2022	FORECAST 2021/2022	Annual Change Tonnes	Annual Change Percent	2021/2022 Budget Tonnes	Budget Change Tonnes	Budget Change Percent
HF	115	121	83	98	-	-	-98	-100.00%	267	-267	-100.00%
KC	387	429	475	495	307	499	4	0.77%	510	-12	-2.26%
LA	298	546	733	608	276	399	-209	-34.41%	690	-292	-42.26%
WA	503	340	449	365	94	257	-109	-29.78%	451	-194	-43.07%
WRWA	3,065	3,190	3,171	3,099	2,127	2,822	-277	-8.94%	2,891	-69	-2.39%
Total	4,368	4,626	4,911	4,665	2,805	3,976	-689	-14.78%	4,809	-833	-17.33%
Change		257	285	-245		-689					
Percentage Change		5.89%	6.16%	-5.00%		-14.78%					

Clinical Waste Delivered (Tonnes)

	2017/2018	2018/2019	2019/2020	2020/2021	TO DATE 2021/2022	FORECAST 2021/2022	Annual Change Tonnes	Annual Change Percent	2021/2022 Budget Tonnes	Budget Change Tonnes	Budget Change Percent
HF	27	23	18	16	10	14	- 2	-10.65%	15	- 1	-7.13%
KC	2	2	1	1	1	1	0	5.21%	1	0	25.44%
LA	1	3	3	4	4	6	2	53.34%	4	3	76.80%
WA	65	64	66	65	49	79	13	20.36%	61	18	29.64%
WRWA	-	-	-	-	-	-	-	0.00%	-	-	0.00%
Total	96	92	88	87	64	101	14	15.94%	81	20	24.60%
Change		- 4	- 3	- 2		14					
Percentage Change		-4.14%	-3.51%	-1.85%		15.94%					

Detritus Waste Delivered (Tonnes)

	2017/2018	2018/2019	2019/2020	2020/2021	TO DATE 2021/2022	FORECAST 2021/2022	Annual Change Tonnes	Annual Change Percent	2021/2022 Budget Tonnes	Budget Change Tonnes	Budget Change Percent
HF	733	611	449	463	334	502	39	8.44%	446	56	12.61%
KC	499	623	1,021	806	509	731	- 75	-9.25%	775	- 44	-5.63%
LA	610	760	518	542	381	519	- 23	-4.33%	576	- 57	-9.86%
WA	2,539	2,992	2,841	2,861	1,798	2,539	- 322	-11.25%	2,905	- 367	-12.62%
WRWA	-	-	-	-	-	-	-	0.00%	-	-	0.00%
Total	4,380	4,986	4,829	4,672	3,022	4,291	- 381	-8.15%	4,702	- 411	-8.74%
Change		606	- 157	- 157		- 381					
Percentage Change		13.82%	-3.15%	-3.24%		-8.15%					

Battery Waste Delivered (Tonnes)

	2017/2018	2018/2019	2019/2020	2020/2021	TO DATE 2021/2022	FORECAST 2021/2022	Annual Change Tonnes	Annual Change Percent	2021/2022 Budget Tonnes	Budget Change Tonnes	Budget Change Percent
HF	1	1	1	0	-	-	- 0	-100.00%	0	- 0	-100.00%
KC	-	-	-	-	-	-	-	0.00%	-	-	0.00%
LA	-	-	-	-	-	-	-	0.00%	-	-	0.00%
WA	-	-	-	-	-	-	-	0.00%	-	-	0.00%
WRWA	22	15	24	32	18	29	- 3	-9.91%	34	- 6	-16.54%
Total	23	15	25	32	18	29	- 3	-10.36%	35	- 6	-17.36%
Change		- 8	10	7		- 3					
Percentage Change		-33.48%	63.14%	28.69%		-10.36%					

Electrical Waste Delivered (Tonnes)

	2017/2018	2018/2019	2019/2020	2020/2021	TO DATE 2021/2022	FORECAST 2021/2022	Annual Change Tonnes	Annual Change Percent	2021/2022 Budget Tonnes	Budget Change Tonnes	Budget Change Percent
HF	15	9	20	10	9	11	1	5.26%	23	- 12	-52.07%
KC	27	33	26	32	10	15	- 17	-54.36%	39	- 24	-62.02%
LA	172	122	113	106	50	69	- 37	-34.83%	62	7	12.04%
WA	10	3	2	4	1	1	- 2	-71.00%	4	- 3	-73.27%
WRWA	738	751	726	792	474	715	- 77	-9.77%	729	- 14	-1.91%
Total	964	917	888	944	543	811	- 134	-14.16%	856	- 45	-5.28%
Change		- 47	- 29	56		- 134					
Percentage Change		-4.83%	-3.19%	6.36%		-14.16%					

Fridge Waste Delivered (Tonnes)

	2017/2018	2018/2019	2019/2020	2020/2021	TO DATE 2021/2022	FORECAST 2021/2022	Annual Change Tonnes	Annual Change Percent	2021/2022 Budget Tonnes	Budget Change Tonnes	Budget Change Percent
HF	94	91	89	81	63	89	9	10.54%	84	5	6.36%
KC	61	64	51	39	36	48	9	23.94%	42	7	16.23%
LA	182	179	174	172	107	151	- 20	-11.93%	151	- 0	-0.26%
WA	100	96	153	75	42	59	- 16	-20.78%	67	- 8	-11.53%
WRWA	65	78	79	74	39	56	- 18	-24.53%	77	- 21	-27.73%
Total	503	507	546	440	287	404	- 36	-8.24%	422	- 17	-4.14%
Change		4	39	- 105		- 36					
Percentage Change		0.76%	7.60%	-19.30%		-8.24%					

Gas Bottle Waste Delivered (Tonnes)

							Annual		2021/2022 Budget		
	2017/2018	2018/2019	2019/2020	2020/2021	TO DATE 2021/2022	FORECAST 2021/2022	Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	2	1	1	1	1	3	2	241.55%	1	2	215.55%
KC	1	1	1	1	1	1	0	8.87%	1	0	1.52%
LA	4	3	4	1	2	3	1	102.89%	1	2	180.46%
WA	2	1	1	1	0	1	-0	-31.37%	3	-2	-73.75%
WRWA	19	15	-	16	6	11	-5	-30.50%	8	3	31.75%
Total	27	21	6	20	10	18	-2	-9.56%	14	4	26.84%
Change		-6	-15	14		-2					
Percentage Change		-21.99%	-70.03%	218.55%		-9.56%					

Carpet Waste Delivered (Tonnes)

							Annual		2021/2022 Budget		
	2017/2018	2018/2019	2019/2020	2020/2021	TO DATE 2021/2022	FORECAST 2021/2022	Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	-	-	-	-	-	-	-	0.00%	-	-	0.00%
KC	-	-	-	-	-	-	-	0.00%	-	-	0.00%
LA	-	-	-	-	-	-	-	0.00%	-	-	0.00%
WA	-	-	-	-	-	-	-	0.00%	-	-	0.00%
WRWA	-	269	375	365	267	396	30	8.33%	359	36	10.10%
Total	-	269	375	365	267	396	30	8.33%	359	36	10.10%
Change		269	106	-10		30					
Percentage Change			39.28%	-2.66%		8.33%					

Inert Waste Delivered (Tonnes)

							Annual		2021/2022 Budget		
	2017/2018	2018/2019	2019/2020	2020/2021	TO DATE 2021/2022	FORECAST 2021/2022	Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	-	-	5	-	-	-	-	0.00%	5	-5	-100.00%
KC	-	-	-	2	-	-	-2	-100.00%	2	-2	-100.00%
LA	-	1	2	-	5	5	5	0.00%	-	5	0.00%
WA	23	0	15	4	-	-	-4	-100.00%	1	-1	-100.00%
WRWA	1,212	1,624	1,677	1,891	1,192	1,765	-126	-6.67%	1,710	55	3.19%
Total	1,235	1,625	1,700	1,897	1,197	1,770	-127	-6.72%	1,719	51	2.97%
Change		390	75	197		-127					
Percentage Change		31.62%	4.61%	11.58%		-6.72%					

Oil/Paint Waste Delivered (Tonnes)

							Annual		2021/2022 Budget		
	2017/2018	2018/2019	2019/2020	2020/2021	TO DATE 2021/2022	FORECAST 2021/2022	Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	-	0	-	-	0	0	0	0.00%	-	0	0.00%
KC	-	-	-	0	-	0	0	0.20%	-	0	0.00%
LA	-	-	-	-	1	1	1	0.00%	-	1	0.00%
WA	0	-	-	-	-	-	-	0.00%	-	-	0.00%
WRWA	15	17	17	16	9	16	-0	-1.01%	11	5	46.68%
Total	15	17	17	16	10	17	0	2.77%	11	6	52.66%
Change		1	0	-1		0					
Percentage Change		9.04%	2.73%	-5.31%		2.77%					

Paper/Cardboard Waste Delivered (Tonnes)

							Annual		2021/2022 Budget		
	2017/2018	2018/2019	2019/2020	2020/2021	TO DATE 2021/2022	FORECAST 2021/2022	Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	-	-	-	-	-	-	-	0.00%	-	-	0.00%
KC	-	-	-	-	-	-	-	0.00%	-	-	0.00%
LA	484	439	423	423	232	344	-79	-18.62%	434	-90	-20.79%
WA	-	-	-	2	-	-	-2	-100.00%	2	-2	-100.00%
WRWA	827	793	962	1,171	726	1,209	38	3.25%	1,065	144	13.56%
Total	1,311	1,232	1,385	1,595	958	1,553	-42	-2.64%	1,500	53	3.51%
Change		-79	152	211		-42					
Percentage Change		-6.02%	12.35%	15.21%		-2.64%					

Scrap Metal Waste Delivered (Tonnes)

							Annual		2021/2022 Budget		
	2017/2018	2018/2019	2019/2020	2020/2021	TO DATE 2021/2022	FORECAST 2021/2022	Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	13	4	19	10	10	14	4	43.20%	29	-15	-50.56%
KC	1	1	0	-	4	4	4	0.00%	0	3	962.63%
LA	115	112	114	62	46	72	9	15.15%	56	16	28.18%
WA	2	0	4	7	-	-	-7	-100.00%	10	-10	-100.00%
WRWA	687	721	666	699	514	789	90	12.84%	641	148	23.09%
Total	818	837	803	779	574	879	100	12.85%	737	142	19.27%
Change		20	-34	-25		100					
Percentage Change		2.42%	-4.08%	-3.06%		12.85%					

Textile Waste Delivered (Tonnes)

							Annual		2021/2022 Budget		
	2017/2018	2018/2019	2019/2020	2020/2021	TO DATE 2021/2022	FORECAST 2021/2022	Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	-	-	-	-	-	-	-	0.00%	-	-	0.00%
KC	-	-	-	-	-	-	-	0.00%	-	-	0.00%
LA	-	-	-	-	-	-	-	0.00%	-	-	0.00%
WA	-	-	-	-	-	-	-	0.00%	-	-	0.00%
WRWA	205	234	254	287	184	287	0	0.08%	265	23	8.62%
Total	205	234	254	287	184	287	0	0.08%	265	23	8.62%
Change		30	20	33		0					
Percentage Change		14.42%	8.46%	13.12%		0.08%					

Tyre Waste Delivered (Tonnes)

							Annual		2021/2022 Budget		
	2017/2018	2018/2019	2019/2020	2020/2021	TO DATE 2021/2022	FORECAST 2021/2022	Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	0	0	1	0	2	2	2	877.78%	1	1	144.09%
KC	0	-	-	0	-	0	0	0.20%	-	0	0.00%
LA	12	12	8	5	6	8	2	45.15%	6	1	22.80%
WA	1	1	1	1	0	0	-1	-85.24%	1	-1	-83.06%
WRWA	-	0	-	-	0	0	0	0.00%	-	0	0.00%
Total	13	13	9	7	8	10	3	38.98%	8	2	24.09%
Change		1	-5	-2		3					
Percentage Change		4.52%	-34.03%	-18.55%		38.98%					

Wood Waste Delivered (Tonnes)

							Annual		2021/2022 Budget		
	2017/2018	2018/2019	2019/2020	2020/2021	TO DATE 2021/2022	FORECAST 2021/2022	Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	-	-	-	-	-	-	-	0.00%	-	-	0.00%
KC	1	1	1	-	-	-	-	0.00%	-	-	0.00%
LA	245	251	140	-	-	-	-	0.00%	-	-	0.00%
WA	-	-	-	-	-	-	-	0.00%	-	-	0.00%
WRWA	3,165	3,474	3,773	3,808	2,355	3,597	-212	-5.56%	3,507	90	2.57%
Total	3,411	3,726	3,913	3,808	2,355	3,597	-212	-5.56%	3,507	90	2.57%
Change		315	187	-104		-212					
Percentage Change		9.24%	5.02%	-2.67%		-5.56%					

Total Waste Delivered (Tonnes)

							Annual		2021/2022 Budget		
	2017/2018	2018/2019	2019/2020	2020/2021	TO DATE 2021/2022	FORECAST 2021/2022	Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	70,785	69,779	68,410	68,843	46,467	69,104	261	0.38%	68,955	149	0.22%
KC	76,597	76,822	75,746	60,660	46,550	68,885	8,225	13.56%	60,354	8,531	14.13%
LA	111,477	111,510	108,311	112,934	74,556	111,288	-1,646	-1.46%	112,837	-1,548	-1.37%
WA	100,395	99,698	99,551	107,470	70,202	105,672	-1,798	-1.67%	107,032	-1,360	-1.27%
WRWA	21,208	21,494	21,128	22,129	13,943	20,737	-1,391	-6.29%	20,424	313	1.53%
Total	380,462	379,303	373,146	372,036	251,717	375,687	3,651	0.98%	369,602	6,085	1.65%
Change		-1,159	-6,157	-1,110		3,651					
Percentage Change		-0.30%	-1.62%	-0.30%		0.98%					

plastics campaign

Positioning Cory and WRWA in the plastics debate

- Cory and WRWA believe that producers and businesses are key to driving down plastic waste, by reducing the production and consumption of plastics that often end up in residual waste.
- Cory and WRWA believe that while resident behavioural change is important, e.g., in relation to encouraging responsible recycling, it is often limited in its effectiveness. The issue must be addressed further upstream, at or before the point of purchase, rather than post consumption e.g. through better product design or by incentivising the consumer to adopt a desired behaviour.
- While measures under the new Environment Act address the plastics issue upstream, it is essential that these are targeted and effective.
- Cory has commissioned an in-depth composition analysis to assess the plastic breakdown in the residual waste entering our EfW facility from households and businesses in London. This will include a specific focus on plastics that fall outside kerbside recycling schemes, as well as their sources and uses.
- This plastics research will be used to inform messaging that will highlight the types, sources and uses of plastics that Cory and WRWA believe should be limited in production / consumption or new recycling services be provided, perhaps by way of reverse logistics for business waste.
- This messaging will form the basis of materials that will be used as tactics in a communications campaign, which will be directed at defined audiences.

audiences

Who do we want to encourage to support our position?

Our messages should be targeted at a range of stakeholders who can use their influence and voices to support our position. This should include:

- Businesses, i.e., plastics producers and consumers, e.g., supermarkets.
- Government, e.g., George Eustice (Defra Secretary), Jo Churchill (waste minister), Defra officials.
- Parliamentarians, e.g., Jim McMahon (shadow Defra secretary), All-Party

Parliamentary Sustainable Resource Group.

- Local government, e.g., relevant councillors in Cory's local authority areas, including WRWA members.
- Industry, i.e., other members of the waste sector including competitors, waste authorities, supply chain.
- Regulators, e.g., Environment Agency.
- Planning Authorities
- Consumers, i.e., members of the public who can personally campaign on the issue (even with friends and family).
- Cory employees and those of the councils it serves.

Tactics

How will we communicate our messages?

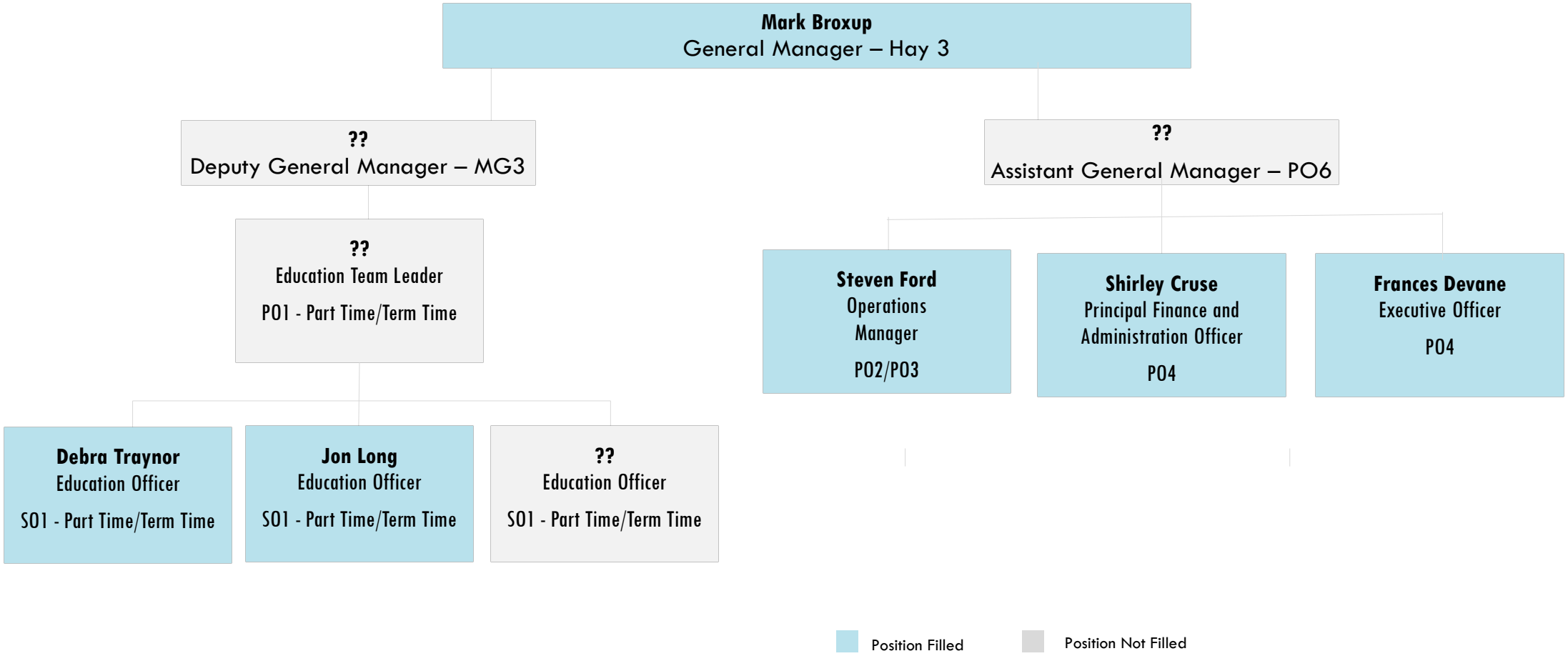
- Cory to draft press release to share with relevant media. Ideally, this should contain a strong quote from a WRWA councillor.
- Cory to draft op-ed by-lined by Dougie or WRWA representative for trade publication, e.g., *Circular Online*
- Cory to prepare content for infographic (cost c.£1-2k).
- Cory to draft social media content for Cory (and potentially WRWA) channels, e.g., posts with (a) infographic attached and (b) employee interview (filmed on phone).
- Cory and WRWA to consider paid editorial content,
- Cory and WRWA to consider advertisement in relevant media, e.g., trade publications or titles with broader focus.
- Cory to draft correspondence to political stakeholders.
- WRWA to advise on how it can leverage its stakeholders to amplify messages.

next steps

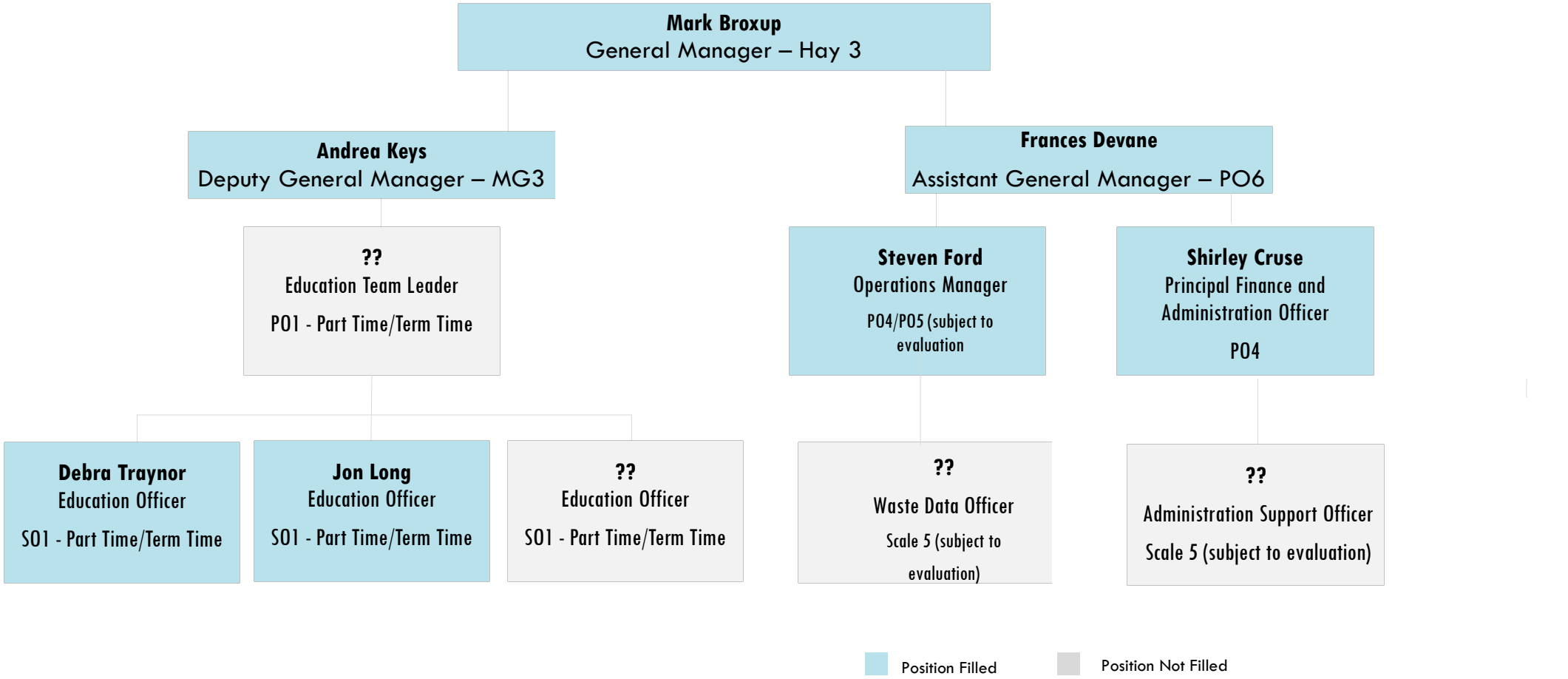
Actions

- WRWA to discuss campaign with members at January meeting.
- Cory to progress in-depth composition analysis.
- Cory to prepare initial draft messaging.

WRWA – Current Structure – June 2021



WRWA - Proposed Structure – January 2022



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Cathy Molloy
Wandsworth Council,
Environment and Community Services Directorate,
The Town Hall,
London,
SW18 2PU

By email: planning@wandsworth.gov.uk

10th January 2022

Dear Cathy,

CONSULTATION RESPONSE ON BEHALF OF WESTERN RIVERSIDE WASTE AUTHORITY TO APPLICATION NUMBER: 2021/5004 – B&Q SMUGGLERS WAY, SW18 1EG

We write on behalf of our client, the 'Western Riverside Waste Authority' (WRWA), with comments on the submitted Full Planning application (App Ref: 2021/5004) (the 'application'), which seeks amendments to the approved proposals for the redevelopment of the B&Q Depot site.

By way of reference to this submission, on behalf of the WRWA, we submitted comments to the previous Full Planning application relating to the redevelopment of the site (ref: 2017/0580). The WRWA's original comments addressed the following topics: design and layout; transport; noise; air quality and odour; lighting; and daylight/sunlight. The WRWA did not object to the principle of the proposals. The response focussed on technical flaws in the submission and specifically those which would compromise the operation of the WRWA's facility at Smuggler's Way and undermine the long-term development potential of the site and its neighbours. A number of revisions were made to the scheme and the WRWA commented on these also.

The case officer's report to Committee concludes at paragraph 3.24 that:

Overall, it is considered that the suitably conditioned or secured via the S106, appropriate mitigation is proposed in order for the development to not result in a significant, detrimental harm upon the continued operation of the WTS, HWRC and Feathers Wharf and accordingly complies with the 7.26 of the London Plan.

In respect of this submission and the changes sought, the WRWA's comments relate to:

- Overshadowing / Daylight / Sunlight;
- Noise; and
- Transport.

It is important to continue to set the WRWA's response in the context of understanding its statutory duties and the policy status of its facility at Smugglers Way, and we do this first before outlining the WRWA's comments on the proposed changes.

Carter Jonas LLP is a limited liability partnership registered in England and Wales, OC304417. Reg office One Chapel Place, London W1G 0BG. Regulated by RICS.

Classification L2 - Business Data

Western Riverside Waste Authority (WRWA)

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.

WRWA is responsible for the reuse, recycling, and recovery of energy from around 400,000 tonnes per annum of municipal waste collected by its constituent councils. WRWA minimises the impact of this essential public service by utilising its riparian transfer stations to transport the residual waste (that which cannot be reused or recycled) by river for treatment which removes around 100,000 HGV movements a year from London's congested roads.

WRWA own two waste transfer stations, one at Cringle Dock, Battersea and the other at Smugglers Way, Wandsworth. The Smugglers Way site (the 'Site') is located adjacent to the northern boundary of the B&Q Depot site is currently operated by Cory Environmental Ltd. The Site is identified as a Safeguarded Wharf' Western Riverside Waste Transfer Station (WRWTS) by the Mayor of London and is protected through the relevant policies within the London Plan. The Site is also protected by adopted Policy PL9 within LB Wandsworth's Core Strategy and Policy EI9 of the Employment and Industry Document. These policies collectively protect the site and ensure that development adjacent to the site should incorporate adequate mitigation measures, so as to not constrain the wharf's operations or allow it to become a nuisance to neighbouring commercial or residential occupiers.

The WRWTS on the Site is identified as site allocation WT11 in the emerging LB Wandsworth Local Plan. The draft allocation states:

There is potential for the redevelopment of the Western Riverside Waste Authority facility which is arranged perpendicular to the River Thames. The facility could be reprovided in a similar location with potential addition of residential uses above a waste facility. This would offer an opportunity to better address Waterside Path and the Riverside West development to the east. Any proposal would need to demonstrate that the addition of residential dwellings would not compromise the operation of the adjacent wharf uses. Proposals would need to consider how edge conditions and access to adjacent waste facilities are managed.

The WRWA submitted representations to the Draft Local Plan Regulation 18 consultation supporting the principle of mixed-use development on the site.

It is clear that the Site plays an important role serving the wider community and is also recognised as an important development site in its own right.

It is also relevant to note that Feathers Wharf which adjoins the WRWA's facility at Smuggler's Wharf is identified for residential/open space development in the Wandle Delta SPD. There is potential for Feathers Wharf and Smuggler's Wharf to form part of a wider regeneration area in the emerging full review of Wandsworth's Local Plan, and therefore it is important that the revised proposals for the B&Q site do not undermine this.

The Revised Proposals

The application relates to Buildings A and C only and excludes Building B which sits on the eastern part of the site. It comprises an increase of 78 homes from 335 to 413 homes and this involves an increase of two storeys to Buildings A3, A4, C1, C2 and C3 and an increase in 4 storeys to building A1 and A2. The layout of the blocks remains as approved.

An extract of the proposed layout is shown below:



Block A directly overlooks the WRWA's facility at Smuggler's Wharf and this response focuses on the proposed increase in height of Buildings A1, A2, A3 and A4.

WRWA's Response to Revised Proposals

Overshadowing / Daylight / Sunlight - Objection

The B&Q Depot site is situated immediately to the south of the Site. Whilst we appreciate that the principle of height in this location has been accepted by the Council through previous planning approvals, the increased scale and massing of the proposed development (up to 19 storeys, previously up to 15 storeys) would further overshadow parts of the Site (albeit we note that the BRE Guidance does not apply to this land use). The WRWA is concerned that the proposed massing could prejudice the future redevelopment of the Site, as well as the neighbouring allocated Feather's Wharf site, for residential or mixed-use development.

The Site is allocated for mixed-use development as site allocation WT11 in the emerging Wandsworth Local Plan and it is important for the WRWA that it is able to maximise the value of its estate through re-investment and ensure its operational efficiency.

The WRWA wishes to ensure that the development potential of the facility at Smugglers Way is not prejudiced by these proposals. The WRWA proposes that the massing should be reduced at this point, subject to further consideration of daylight and sunlight, in order to safeguard the development potential of its site.

The WRWA has no objection to additional height on Block C.

Noise - General Comment

For amenity areas of the new upper floor apartments, the ES Addendum confirms that noise levels will be equal to, or lower than, those associated with the amenity areas in the approved scheme. The WRWA continues to support the inclusion of enclosed amenity space / winter gardens in Buildings A1-A3 as this will provide the appropriate level of acoustic protection to residents of these blocks given the proximity to the Site which will be a source of considerable noise.

We understand that the application does not include any revisions to the existing external amenity spaces and that these will be provided in the same locations. The WRWA has no comment on this aspect of the application given that the principle of amenity spaces in these locations has already been accepted by the Council.

Transport - General Comment

We understand that the application includes no revisions to the car parking provision as approved and are therefore supportive of this aspect of the application. We would however like to reiterate that special consideration should be given to the operational needs of the WRWA's facility throughout the demolition/construction phases of the development. These works should not exacerbate the existing traffic

congestion within the immediate area which could undermine the day-to-day operational efficiency of the facility.

Conclusion

The WRWA does not object to the principle of a denser redevelopment on the B&Q Depot site, however, is concerned with the additional height of Buildings A1-A4 which lie adjacent to the Site. The WRWA considers that this element of the proposal is likely to constraint its future operation of the Site for potential residential or commercial uses by means of overshadowing, and daylight and sunlight issues.

The WRWA proposes that the massing should be reduced at this point, subject to further consideration of daylight and sunlight, in order to safeguard the development potential of its site.

For this reason, the WRWA must register an objection to this planning application.

Please do not hesitate to contact me should you require any additional information.

Yours sincerely



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