Tower Hamlets Waste Data Study

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Contents

Executive Summary

I. This Waste Data Study has been prepared to support Tower Hamlets' new Local Plan.

II. Tower Hamlets is required to plan for seven waste streams. The largest of these are Local Authority Collected Waste (LACW), Commercial & Industrial Waste (C&I) and Construction, Demolition and Excavation Waste (CD&E). The London Plan apportions an amount of LACW and C&I waste to each borough and Tower Hamlets is required to have regard to these apportionment targets.

III. Tower Hamlets' waste capacity need over the Local Plan period is set out in Table E1.

Table E1: Tower Hamlets' waste capacity need 2026-2041 (tonnes)

Waste stream	2026	2031	2036	2041
Apportionment (LACW and C&I)	197,000	199,000	203,000	207,000
CD&E waste	281,000-455,800	281,000-455,800	281,000-455,800	281,000-455,800
Hazardous waste included in LACW, C&I and CD&E waste streams				
All other waste streams	0	0	0	0

IV. Waste facilities contribute towards meeting the borough's need if they treat, reuse/ recycle or bulk ready for reuse/recycling. Tower Hamlets has three existing waste sites which are safeguarded for waste use, however only one of the sites is currently operational and this is a transfer station which contributes up to 2,000 tonnes a year towards the borough's waste management need. There are also a number of exempt facilities which contributes a small amount to the borough's existing capacity. A summary of Tower Hamlets' existing waste management capacity is set out below.

Table E2: Existing waste management capacity in Tower Hamlets (tonnes)

Source	LACW/C&I capacity	C&D capacity
Existing licenced waste sites	2,000	0
Exempt waste sites	12,630	600
Total	**14,630**	**600**

V. To meet the shortfall in the borough's waste need, the Local Plan will need to identify sites and/or areas for new waste management facilities. Indicative land requirements to meet the capacity gap by 2026 is up to 3.2ha for LACW/C&I (apportioned waste) and up to 4.6ha for C&D waste.

VI. A site search carried out in 2023 identified no sites in Tower Hamlets for new waste facilities which are suitable or deliverable. No new waste facilities are known to be coming forward in Tower Hamlets. Tower Hamlets has two Strategic Industrial Locations and one Local Industrial Location, with a combined area of 21.7ha, which are considered suitable for new waste facilities, in principle. Waste sites could come forward within these industrial areas to meet waste capacity need.

VII. In order to be in general conformity with the London Plan, Tower Hamlets' Local Plan will need to identify how capacity for its apportionment targets will be met. Alongside identifying locations suitable for new waste facilities, it is recommended that Tower Hamlets approach other London Boroughs for help to meet its apportionment targets.

VIII. Tower Hamlets will continue to rely on waste facilities outside its administrative boundaries and will need to engage with authorities who receive strategic amounts of waste from Tower Hamlets to ensure that this can continue.

1. Introduction

1.1 Tower Hamlets is reviewing the Local Plan adopted in January 2020. From January to March 2023 the Council undertook early engagement to gather feedback from stakeholders and local communities in order to capture views across a broad range of themes. The council has also updated key parts of the evidence base which will support a new Local Plan. This Waste Data Study forms part of that work.

1.2 Tower Hamlets has a number of different roles and responsibilities related to waste. This Data Study relates to Tower Hamlets' role as a Waste Planning Authority. It calculates how much waste will be generated in the borough over the next fifteen years and identifies existing waste sites and capacity within the borough. In addition to its planning role, Tower Hamlets has separate responsibilities for preventing, collecting and managing Local Authority Collected Waste (LACW) which is the waste collected from households, streets and Reuse and Recycling Centres. Further information on waste prevention, collection and management in Tower Hamlets can be found on the borough's website .

1.3 As part of its planning role, Tower Hamlets is required to plan for seven waste streams. The largest of these are Local Authority Collected Waste (LACW), Commercial & Industrial Waste (C&I) and Construction, Demolition and Excavation Waste (CD&E). The London Plan apportions an amount of LACW and C&I waste to each borough and Tower Hamlets is required to have regard to these apportionment targets.

1.4 In line with national policy, this evidence base looks at Tower Hamlets' need for all seven waste streams, including waste apportioned by the London Plan. It looks at the current waste management picture in the borough, where and how Tower Hamlets' waste is being managed.

1.5 This evidence base also identifies Tower Hamlets' waste need by identifying how much waste will need to be managed over the plan period, existing capacity and how waste will be managed in the future. It also identifies where Tower Hamlets' waste is exported to.

2. Policy Context

2.1 This Waste Evidence Base and waste policies in Tower Hamlets' Local Plan need to comply with national, regional and local policies. These are set out below.

Localism Act

2.2 The Localism Act 2011 gave the responsibility for strategic planning back to local authorities acting individually. London is an exception to this and the Mayor has a responsibility for strategic planning through the London Plan, however waste planning is still the responsibility of individual Boroughs.

2.3 Section 110 of the Localism Act prescribes the "Duty to Co-operate" between local authorities in order to ensure that they work together on strategic issues such as waste planning. The duty is "to engage constructively, actively and on an on-going basis" and must "maximise the effectiveness" of all authorities concerned with plan-making. For matters such as waste planning, it is therefore important that local authorities can show that they have worked together in exchanging information and reaching agreement on where waste management facilities will be built.

2.4 Waste is a strategic cross-boundary issue and is subject to the duty to co-operate. It should be noted that the government intends to repeal the duty to co-operate in its current form, but it is likely that waste planning authorities will continue to engage with each other on issues of strategic importance. This waste evidence base includes data on information on imports and exports of waste from Tower Hamlets to assist the borough with duty to co-operate engagement.

Resources and Waste Strategy

2.5 The Government's "Resources and Waste Strategy for England[1]" was published in December 2018, building on the recent "A Green Future: Our 25 Year Plan to Improve the Environment[2]" (January 2018). The overall strategy is to reduce the amount of waste produced, promote resource efficiency and move towards a circular economy.

2.6 There are a number of policy areas that could affect the amount and type of waste that local authorities have to plan for in the future. For example, producers paying for the disposal of their own packaging, a tax on plastic packaging which does not include 30% recycled content, deposit return schemes, streamlined recycling and food waste collection services, and greater efficiency of energy recovery facilities. The strategy takes a 25 year view and it remains to be seen how it will impact on how waste planning authorities plan for waste.

2.7 The Resources and Waste Strategy committed to reviewing the Waste Management Plan for England, National Planning Policy for Waste and the accompanying Planning Practice

[1] https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england
[2] https://www.gov.uk/government/publications/25-year-environment-plan

Guidance in 2019 to align national policies with the Resources and Waste Strategy. However, this timetable has slipped and the review will influence the next iteration of Tower Hamlets' waste evidence base rather than this one.

2.8 The Resources and Waste Strategy acknowledges the deficiency in data on waste and commits to develop a new approach to collecting waste data, including a move away from weight-based targets towards impact-based targets. The timetable for this review is not yet known and it is unlikely to affect this waste evidence base.

Waste Management Plan for England

2.9 The Waste Management Plan for England (2021) Provides an overview of waste management in order to fulfil the requirements of the Waste (England and Wales) Regulations 2011. It sets out how much waste is generated in England and how that waste is managed. It also includes an assessment of waste infrastructure needs in the future.

2.10 It states that waste planning authorities are responsible for producing waste plans to support the objectives of the Waste Management Plan for England. As noted above, the Resources and Waste Strategy commits to reviewing the Waste Management Plan for England in 2019 but this timetable may slip.

National Planning Policy Framework

2.11 The National Planning Policy Framework (NPPF) was last revised in July 2021. An update to the plan-making section of the Planning Practice Guidance (PPG) was published in October 2021.

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

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

2.13 This waste evidence base focuses on meeting these requirements, including identifying Tower Hamlets' objectively assessed waste management needs (positively prepared), identifying an appropriate strategy for Tower Hamlets' waste (justified), identifying strategic waste exports from Tower Hamlets (effective) and ensuring conformity with waste policies (consistent with national policy).

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

2.15 It should be noted that a review of the NPPF by the government is underway and that the test of soundness is under review as well as other aspects that may affect plan-making.

National Planning Policy for waste

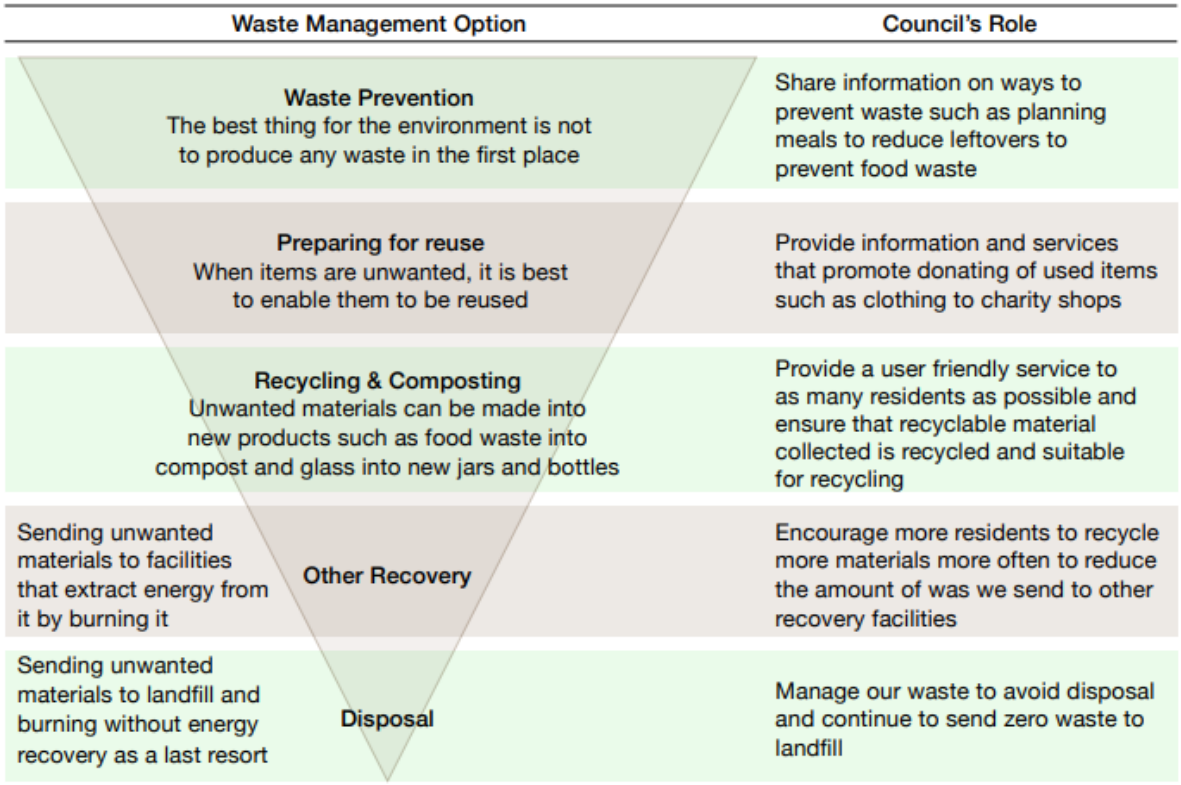
2.16 The National Planning Policy for Waste[3] (NPPW), published in 2014, sets out the Government's waste planning policies which all local planning authorities must have regard to when developing local waste plans. The NPPW is supplemented by the Planning Practice Guidance[4] (PPG) section on waste which provides further detail on how to implement the policies.

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

[3] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

[4] https://www.gov.uk/guidance/waste

Figure 1: The Waste Hierarchy



Source: London Borough of Tower Hamlets Waste Management Strategy

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

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

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

2.20 This evidence base includes all these elements.

2.21 The NPPW requires information on existing waste management facilities to include:

- site location details – name of site and operator, address, postcode, local authority, grid reference etc.;
- type of facility – what process or processes are occurring on the site and which waste streams they manage;

- licence/permit details – reference number, tonnage restrictions, waste type restrictions, dates of renewal, etc and status if not yet licensed and permitted;
- capacity information – licensed and permitted throughput by waste type;
- site lifetime or maximum capacity – it is important to record the expected lifetime of facilities and, where appropriate, their total remaining capacity;
- waste sources – origin of wastes managed, broken down by type and location;
- outputs from facility – recovery of material and energy, production and export of residues and the destination of these, where appropriate; and
- additional information – potential of site for increasing throughput, adding further capacity, other waste management uses, etc.

2.22 Appendix A in this study includes this information.

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

- Local Authority Collected Waste (LACW)[5] (apportioned by the London Plan)
- Commercial & Industrial waste (C&I)[6] (apportioned by the London Plan)
- Construction, Demolition & Excavation (CD&E)
- Low Level Radioactive waste (LLRW)
- Agricultural waste
- Hazardous waste
- Waste water

2.24 This report sets out existing capacity and discusses the plan for each waste stream.

2.25 The NPPW requires Local Plans to identify sufficient opportunities to meet the identified needs of their area for the management of waste streams. The London Plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the Plan. The London Plan requires boroughs to provide capacity through facilitating the maximum use of existing facilities. Both the NPPW and London Plan direct new waste facilities towards industrial locations. Section 6 of this report looks at land for new waste facilities in Tower Hamlets.

National Planning Policy Statements

2.26 National Planning Policy Statements (NPS) comprise the Government's objectives for the development of nationally significant infrastructure in a particular sector and include any other policies or circumstances that ministers consider should be taken into account in decisions on infrastructure development. There are three relevant NPSs for waste: NPS for Renewable Energy (2011), NPS for Hazardous Waste (2013) and NPS for Waste

[5] Local Authority Collected Waste (LACW) comprises household waste and other waste collected by the council, such as street sweepings and municipal bins. This waste stream has historically been called 'Municipal' waste.
[6] Also known as business waste

Water (2012). There are no known plans to deliver a nationally significant facility for hazardous waste or waste water in Tower Hamlets.

London Environment Strategy

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

2.28 It is more difficult for Tower Hamlets to directly influence business recycling rates and therefore partnership working with the London Waste and Recycling Board will be key to increasing business waste recycling. A key element of increasing municipal waste recycling is to ensure there is sufficient space for the separation and storage of recyclables for collection and Tower Hamlets' Reuse, Recycle and Waste SPD will be an important tool.

2.29 The Mayor wants London to be a "zero waste city" which means no biodegradable or recyclable waste to landfill by 2026. A negligible amount of Tower Hamlets' LACW and C&I waste goes to landfill so the focus will be on diverting more recyclable CD&E waste away from landfill.

London Plan

2.30 Tower Hamlets' Local Plan and waste policy will need to be in general conformity with the London Plan (March 2021).

2.31 The London Plan states that London should manage as much of its waste within its boundaries as practicable, aiming to achieve waste net self-sufficiency by 2026 in all waste streams except for excavation waste. To meet this aim, the plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the plan and to plan for those waste streams not apportioned by the London Plan. Details of Tower Hamlets apportionment targets are set out in Section 4 of this report.

2.32 The London Plan incorporates targets set out in the Mayor's Environment Strategy, including London-wide target of 65% municipal (household and business) waste by 2030. This breaks down as 50% of LACW by 2025 and 75% of C&I by 2030. It also has targets of 95% reuse/recycling/recovery of construction and demolition waste (C&D) and 95% of excavation waste should be used for beneficial use.

2.33 The London Plan introduces a new requirement for referable applications[7] to include a "Circular Economy Statement" to set out how much waste the proposed development is expected to generate and where it will be managed. This will assist Tower Hamlets in monitoring these targets. Further guidance on Circular Economy Statements has been published by the Mayor of London. The London Plan supports boroughs who adopt lower thresholds for Circular Economy Statements in their Local Plans. However, additional training and resources would be needed by case officers to assess planning applications between the thresholds of 'major' and 'referable' and many Boroughs have decided to consider this option after the policy on Circular Economy Statements has been put into practice by the GLA.

2.34 The Circular Economy is another key tool for tackling the climate emergency. When applied to the built environment, circular economy principles significantly reduce greenhouse gas emissions by avoiding extraction of raw materials, reducing production of construction materials, retaining embodied carbon and eliminating waste.

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

2.36 The London Plan makes clear that all existing waste sites should be safeguarded and retained in waste use. Existing waste sites are defined as those with planning permission for waste use or those with an Environment Agency permit. Site profiles for existing waste sites in Tower Hamlets is in Appendix A.

2.37 The London Plan requires compensatory capacity elsewhere in London if a waste site is redeveloped for another use. Compensatory capacity must be at or above the same level of the waste hierarchy of that which is lost, and that any loss of hazardous waste capacity must be replaced with hazardous waste capacity. Waste sites can only be released without re-providing capacity if it can be demonstrated that there is sufficient capacity elsewhere in London and the target of achieving net self-sufficiency is not compromised.

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

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

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

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

2.40 This Waste Evidence Base uses this definition to assess the existing capacity in Tower Hamlets.

2.41 Part G of London Plan Policy D4 Housing quality and standards requires housing to be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) food waste as well as residual waste.

Local Policies and Supporting Documents

2.42 The Tower Hamlets Local Plan 2031: Managing Growth and Sharing Benefits was adopted by Full Council in January 2020. The Plan provides spatial policies, development management policies and site allocations to guide and manage development in the borough. The council sought early engagement on the preparation of a new Local Plan in January – March 2023. This was to gather feedback from the local community and capture views across a broad range of themes.

2.43 Local Plan Policy S.MW1 Managing our waste safeguards existing waste sites in Tower Hamlets and the London Legacy Development Corporation (LLDC) area (parts 1 and 2) and supports maximising the efficiency and/or capacity of waste facilities in the borough (part 3). Existing waste sites are listed as:

- Clifford House, Towcester Road
- Northumberland Wharf, Yabsley
- Ailsa Street
- McGrath House, Hepscott Road (LLDC)
- 455 Wick Lane (LLDC)

2.44 Part 4 of the policy states "*Applications for non-waste uses on safeguarded sites will only be permitted where it is clearly demonstrated that compensatory capacity will be delivered on a suitable replacement site within the borough in the first instance or another part of London which provides equivalent to, or greater than the maximum annual throughput that the existing site can achieve*." Part 5 states "*Development that prevents or prejudices the safeguarding of these sites will only be supported where alternative waste capacity provision is made*."

2.45 Part 6 of the policy identifies locations in the Borough considered suitable for new waste facilities. These are:

- The Highway, Local Industrial Location
- Empson Street, Strategic Industrial Location
- Fish Island, Strategic Industrial Location (LLDC)

2.46 Part 7 of the policy allows small-scale integrated waste facilities outside of areas of search where they contribute to managing apportioned waste and are of a scale and nature that does not compromise adjacent existing and proposed land uses.

2.47 Part 8 of the policy requires new development to reuse and recycle construction, demolition and excavation waste on or close to the site where it arises.

2.48 Tower Hamlets adopted a Reuse Recycle Waste Supplementary Planning Document (SPD) in 2021. The SPD provides guidance with regard to the storage and management of recyclables and waste, and the implementation of high-quality on-site waste management systems. The SPD sets out guidance for developers on how reuse, recycling and waste management should be addressed in proposals for new residential and mixed-use development.

3. Waste Arisings and Management in Tower Hamlets

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

Local Authority Collected Waste

3.2 In 2021 Tower Hamlets produced just under 108,400 tonnes of Local Authority Collected Waste (LACW)[8]. This was made up of around 89,400 tonnes from households and 19,000 tonnes of 'trade' waste collected by Tower Hamlets from locations such as household recycling centres, street sweepings, gully emptyings, public bins, and civic buildings. Table 3.1 shows how the borough's LACW was managed.

Table 3.1: Tower Hamlets' LACW management routes 2020/21

	Tonnes of waste
Total LACW	108,454
Household waste	89,377
Non-household 'trade' waste	19,077
LACW sent for recycling-composting-reuse	20,970 (19%)
LACW not sent for recycling	87,484

Source: ENV18 - Local authority collected waste: annual results tables

3.3 Tower Hamlets exports all of its LACW. Mixed recyclables are taken to a Materials Recovery Facility (MRF) in Newham to be sorted before their onward journey to be reprocessed into new products. 19% of Tower Hamlets' Local Authority Collected Waste was recycled in 2021. Residual ("black bag") waste is taken by barge to Cory's Riverside Energy Recovery Facility in Bexley to be turned into energy.

Commercial and Industrial Waste

3.4 Commercial and Industrial (C&I) waste arisings are notoriously difficult to calculate. However, London boroughs benefit from the London Plan waste evidence base which provides an estimate of waste arisings for each London Borough.

3.5 The London Plan waste evidence base[9] uses the 2009 Survey methodology. The Report states:

> *Defra 2009 survey was co-funded by the London Waste and Recycling Board (LWaRB). The Defra 2009 survey quantifies C&IW arisings for each of London's commercial and industrial sectors, as well as providing estimates of the borough level contribution to the C&IW total. As per findings of the previous review of C&IW data*

[8] Source: WasteDataFlow

[9] London Plan Waste Forecasts and Apportionments: Task 1 – GLA Waste Arisings Model Critical Friend Review (SLR, March 2017)

undertaken for the FALP, it is concluded that Defra's 2009 C&IW survey remains the most robust and fit for purpose source of baseline waste data for London Plan forecasts.

3.6 The London Plan waste evidence base is therefore considered the most appropriate source for C&I arisings. The report estimates that Tower Hamlets generates around 182,000 tonnes of C&I waste per annum.

3.7 However, for the purposes of waste planning in Tower Hamlets, it is not crucial to know how much C&I waste is generated because the London Plan apportionment target replaces 'need' for both C&I and LACW waste streams. The London Plan apportions an amount of London's LACW and C&I waste arisings to each borough based on the ability of each borough to provide waste capacity. If every borough provides capacity to meet their apportionment targets then London will be net self-sufficient for managing C&I and LACW. Tower Hamlets' apportionment target is 195,000 tonnes by 2021 and 207,000 tonnes by 2041. This is well below the estimated arisings for both waste streams but this is what Tower Hamlets is required to plan for.

Construction, Demolition and Excavation Waste

3.8 The amount of Tower Hamlets' Construction, Demolition and Excavation (CD&E) waste varies from year to year[10] reflecting development taking place across the Borough. As with C&I waste, estimating the amount of CD&E waste is difficult because it relies on waste carriers accurately recording the origin of the waste. The main source of waste data is the Waste Data Interrogator.

3.9 In order to estimate the amount of CD&E waste generated in Tower Hamlets, the Waste Data Interrogator was used to gather inputs[11] to permitted facilities. Usually, this methodology makes an adjustment to waste inputs to intermediate sites (eg transfer) within the same administrative area, but as the vast majority of Tower Hamlets' arisings are exported, this is not considered necessary. CD&E waste with the origin of Tower Hamlets and managed at licenced facilities is set out in Table 3.2. Hazardous waste has not been removed from the total as the proportion is very small.

Table 3.2: CD&E waste managed through licenced facilities (tonnes)

Management Route	2017	2018	2019	2020	2021
All C&D	**54,252**	**62,209**	**105,080**	**98,290**	**91,989**
Landfill	1,591	347	1,201	5,536	1,073
Transfer	23,842	27,556	57,667	35,113	26,881
Treatment	23,833	34,006	43,679	56,148	62,906
Metal Recycling Sites	4,986	300	2,533	1,493	1,130
All Excavation	**388,107**	**549,042**	**496,012**	**232,693**	**201,638**
Landfill	284,347	467,914	345,192	182,394	151,123

[10] Source: Waste Data Interrogator

[11] This data includes EWC Chapter 17 (Construction & Demolition Waste), and EWC codes 19 12 09 (minerals such as sand, stones) and 20 02 02 (soil and stones). Excavation waste is EWC code 17 05 04 and C&D waste is the remainder.

Management Route	2017	2018	2019	2020	2021
Recovery to Land	87,241	23,793	102,286	3,773	17
Transfer	10,806	51,082	39,598	17,169	15,346
Treatment	5,712	6,252	8,936	29,357	35,153
Total CD&E Waste	**442,359**	**611,251**	**601,092**	**330,983**	**293,627**

Source: Waste Data Interrogator 2017-2021

3.10 Table 3.2 shows that Tower Hamlets is meeting the London Plan target of 95% reuse/recycling/recovery of C&D waste. The London Plan also has a target of 95% beneficial use of excavation waste. The table shows some beneficial use (recovery to land) but a significant amount of excavation waste is going to landfill, and it is not clear if this waste is also being put to beneficial use such as restoration as this is not possible to measure using publicly available data.

3.11 In addition to licenced facilities, CD&E waste is managed at exempt facilities. Exempt facilities still need to register their operations with the Environment Agency but are not required to report their throughput, so assumptions are required to estimate their capacity. Tower Hamlets has one exemption for C&D waste which manages an assumed total of 600 tonnes of waste annually. Further details of assumptions made are set out in Table 5.2.

3.12 With the exception of CD&E material which is recycled and reused on site, and the very small amount managed at exempt facilities, all of Tower Hamlets' CD&E waste is exported.

Hazardous waste

3.13 Hazardous waste is a component part of the other waste streams. Arisings vary each year but have been between 12,939 tonnes and 31,097 tonnes over the last five years[12]. Hazardous waste arising in Tower Hamlets is exported to specialist facilities outside London.

Other waste streams

3.14 A small amount of low level radioactive waste arises in Tower Hamlets, mainly from institutions like hospitals and research and development facilities. No additional capacity is needed to manage this waste stream.

3.15 There is no agricultural waste arising in Tower Hamlets. No additional capacity is needed to manage this waste stream.

3.16 Tower Hamlets' wastewater and sewage sludge is treated at the sewage treatment works in Beckton, in the London Borough of Newham. A major upgrade is underway so it can receive wastewater from the new Thames Tideway Tunnel and provide for a growing population until 2036.

[12] Source: Hazardous Waste Data Interrogator 2017-2021 (hazardous waste recorded as arising in Tower Hamlets)

4. Tower Hamlets' Waste Need

4.1 The London Plan aims for net self-sufficiency for all waste streams, except excavation waste, by 2026. For Tower Hamlets, net self-sufficiency means providing enough waste capacity to manage the equivalent amount of Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste apportioned by the London Plan, the equivalent amount of Construction and Demolition (C&D) waste generated in Tower Hamlets, and as much Excavation waste as practicable.

LACW and C&I waste need

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

4.3 Tower Hamlets' apportionment targets are:

Table 4.1: Tower Hamlets' Apportionment Targets

Waste stream	2021	2026	2031	2036	2041
Apportionment (LACW and C&I)	195,000	197,000	199,000	203,000	207,000

Source: London Plan (March 2021) and supporting waste evidence base reports (2017) [13]

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

CD&E waste need

4.5 The methodology for calculating C&D waste arisings is set out in paragraph 33 of the Planning Practice Guidance: Waste. It states "Waste planning authorities should start from the basis that net arisings of construction and demolition waste will remain constant over time" and goes on to say that any significant planned regeneration or major infrastructure projects over the timescale of the Plan may be relevant.

[13] Apportionment targets in the London Plan are provided for 2021 and 2041 only. The figures for years 2026, 2031 and 2036 have been estimated using Tower Hamlets' apportionment share of 2.4% of the overall waste arisings in London set out in Tables 2-2 and 3-3 of the London Plan Waste Forecasts and Apportionments Task 1 – GLA Waste Arisings Model Critical Friend Review, SLR (March 2017)

4.6 Tower Hamlets has no significant planned increase in development over the plan period; the current level of development currently taking place in the borough will continue. The Tower Hamlets Local Plan 2031 includes a target of 3,931 new homes per year between 2016 and 2031. The London Plan housing targets fall within a similar range (3,473 per annum (2019/20 -2028/29)).

4.7 Recent housing completions for Tower Hamlets are set out in the government's Housing Delivery Test reports. These are set out in Table 4.2.

Table 4.2: Tower Hamlets' Net Residential Unit Completions 2016/17-2019/20

Tower Hamlets	2016/17	2017/18	2018/19	2019/20
Housing completions	4,823	2,010	1,526	4,570

Source: Housing Delivery Test 2019 and 2020 measurement

4.8 CD&E arisings have not been 'constant' over recent years (see Table 3.2), and the arisings do not correspond with housing completions of the same year. An appropriate methodology for CD&E waste, therefore, is to calculate an average across the last five years which provides an approximation of "constant over time" in line with the suggested methodology of the PPG. Table 4.3 below shows the average across 2017-2021 projected over the Local Plan period.

Table 4.3: Average Tower Hamlets CD&E arisings from 2017-2021 projected over the Local Plan period

Waste stream	2026	2031	2036	2041
C&D	82,364	82,364	82,364	82,364
Excavation	373,498	373,498	373,498	373,498
Total CD&E	**455,862**	**455,862**	**455,862**	**455,862**

4.9 Another source for CD&E waste projections is the Local Aggregate Assessment (LAA) for London[14]. The most recent LAA is 2018. Figure 2 of the LAA sets out Forecasts of CD&E Waste in London. The figure for Tower Hamlets is shown in Table 4.4 below.

Table 4.4: LAA Forecasts of CD&E Waste in London

	2026	2031	2036	2041
Tower Hamlets	281,000	293,000	303,000	Not Provided

Source: Local Aggregate Assessment for London (July 2018)

4.10 The LAA CD&E projections are below the average CD&E projections based on the WDI methodology. As CD&E waste arisings differ from year to year, sometimes significantly, the projection for waste arisings originating in Tower Hamlets can reasonably be presented as a range between 281,000 and 455,800 tonnes per annum.

[14] At the time of writing, the most up to date Local Aggregate Assessment for London is from July 2018.

4.11 Buildings, both new and existing, should be thought of as 'material banks'. They encompass large quantities of embodied carbon that if carefully designed or deconstructed can be harnessed for future use. In recognition of the continuing real estate development across both new build and refurbishment there is an opportunity for Tower Hamlets to capitalise on these resources by supporting a Circular Construction Economy (CCE) through establishment of a Circular Economy Material Hub (CEMH).

Hazardous waste

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

Other waste streams

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

Summary of Waste Need

4.14 A summary of the amount of waste Tower Hamlet's needs to plan for is set out in Table 4.5.

Table 4.5: Tower Hamlets' waste capacity need 2026-2041 (tonnes)

Waste stream	2026	2031	2036	2041
Apportionment (LACW and C&I)	197,000	199,000	203,000	207,000
CD&E waste	281,000-455,800	281,000-455,800	281,000-455,800	281,000-455,800
Hazardous waste included in LACW, C&I and CD&E waste streams				
All other waste streams	0	0	0	0

5. Existing Sites and Capacity

5.1 Waste capacity in Tower Hamlets is limited and currently only includes capacity at exempt waste facilities. No new waste facilities are currently planned in Tower Hamlets.

Safeguarded Waste Sites

5.2 There are three safeguarded waste sites in Tower Hamlets; one operational facility and two non-operational facilities. These sites are listed in Table 5.1. Where relevant, the table also includes the type of waste managed at each facility and the maximum throughput each site has achieved over the last five years. More details on these sites are provided in the Site Profiles in Appendix A. Only capacity which 'manages' waste in line with the London Plan definition (para 9.8.4) can contribute to meeting waste management need in the Borough. Table 5.1 also shows how much waste management capacity each facility contributes to meeting waste need.

Table 5.1: Safeguarded waste sites in Tower Hamlets with maximum throughput capacity

Site Name	Address	Facility Type	Input Waste type(s)	Maximum Throughput (tonnes)	Waste Management Capacity
Northumberland Wharf Transfer Station (Cory)	Yabsley Street, Poplar, London, E14 9RG	Reuse and Recycling Centre (RRC) and Transfer Station	LACW/C&I	158,181	2,000
Towcester Road (Clifford Devlin)	Clifford House, Towcester Road, Bow, London, E3 3ND	Hazardous Waste Transfer Station	Hazardous	263	0
J B Riney & Co Ltd	455 Wick Lane, Bow, London, E3 2TB	Transfer Station	CDE	64,610	0

Source: Waste Data Interrogator 2017-2021

5.3 Further details of these sites, including throughput for the past five years, can be found in the Site Profiles in Appendix A.

5.4 Northumberland Wharf is predominantly a transfer station but bulks up to 2,000 tonnes of material per annum (for example garden waste and electricals) ready for

composting/recycling. This is the only capacity which contributes to "managing" waste in the borough.

5.5 Towcester Road (Clifford Devlin) and J B Riney & Co Ltd retain a licence, but are non-operational. Both operators were contacted for further information on their plans for their respective sites. J B Riney confirmed they are retaining the licence in case they wish to start transferring waste from the site as previously. No response was received from Clifford Devlin. These sites will remain safeguarded for waste use in line with London Plan policy SI9.

5.6 It should be noted that two sites - Quick Skips and Blackwall Marine Diesel – appear in the Waste Data Interrogator but are no longer waste sites. Tower Hamlets' previous Waste Data Study (2017) identified these sites as forming part of a planning application for housing. If planning permission was granted they were to be removed from the list of safeguarded sites. Planning permission was granted in 2018 (PA/16/02692) and the sites are no longer safeguarded waste sites.

McGrath House, Hepscott Road

5.7 A hybrid planning application was submitted for a comprehensive mixed use redevelopment on the McGrath House, Hepscott Road site in the LLDC / Tower Hamlets area in 2016. The application was considered by the LLDC Planning Decisions Committee in February 2018 and Members deferred the application in order to receive additional information on the potential harm from the loss of waste capacity for Tower Hamlets' waste apportionment. At the time of the application the amount of waste capacity at the McGrath House, Hepscott Road site was identified in Tower Hamlets' 2017 Waste Data Study as 26,353 tonnes, of which 10,539 tonnes contributed towards meeting the borough's apportionment target[15].

5.8 The report of the subsequent meeting of the LLDC Planning Decisions Committee in May 2018 states "*Officers have further considered the impacts from the loss of the waste capacity and have concluded that this would not result in unacceptable environmental impacts because it has been demonstrated that the waste capacity is being satisfactorily re-provided elsewhere within Greater London. Whilst this would not count towards LB Tower Hamlets (LBTH) waste apportionment target as allocated by the GLA, the GLA confirm that they are satisfied that the waste capacity is being re-provided. It is considered that the appropriate course of action is for LBTH to lobby GLA to take account of this loss of waste capacity either through a reduction in apportionment or brokering a deal with LBTH and another London borough*."

[15] The amount of capacity contributing to capacity for apportioned waste and CD&E waste was calculated by the proportions of each waste stream being managed at the facility (source Waste Data Interrogator 2016). In 2016 McGrath's Hepscott Road site managed 26,353 tonnes of apportioned waste which represents 31% of total throughput. LBTHs 'Waste Management Evidence Base Review 2017' states that the site's current contribution towards the borough's apportionment target has further reduced to 10,539 tonnes. This figure was used in the application as the amount of replacement capacity required. .

5.9 It is recommended that the council write to East London as part of the duty to co-operate to request that the compensatory capacity provided in the London Borough of Barking & Dagenham (at total of 26,353 tonnes) be protected and 'transferred' back to Tower Hamlets (see section 8).

Exempt Sites

5.10 Exempt sites are waste facilities not requiring Environment Agency permits to operate. Exempt waste facilities are ancillary to the main business operation, for example the urban farms and National Trust properties in Tower Hamlets are permitted to compost small volumes of vegetation, cardboard and food wastes to produce compost.

5.11 There is no requirement to report the amount of waste being managed at an exempt facility so an estimate needs to be made using the register of exempt facilities. The methodology for doing this is set out in Defra's "New Methodology to Estimate Waste Generation by the Commercial and Industrial Sector in England" published in 2014. In particular Appendix E of the methodology states which type of exemption should be included when calculating C&I and CD&E capacity.

5.12 Exemptions are classified under a range of 57 paragraph descriptions categorised as U (use of waste), T (treatment of waste), D (disposal of waste) and S (storage of waste). For the purposes of this study, only exempt facilities which 'manage' waste rather than store it are of interest.

5.13 A full list of exempt waste facilities in Tower Hamlets is set out in Appendix B. A summary of Tower Hamlets' assumed exemptions capacity for C&I and C&D waste is provided in Table 5.2 below.

Table 5.2: Assumed capacity at Tower Hamlets' exempt sites

Paragraph No.	Description	Number of exemptions	Assumed capacity for each exemption
D7	Burning plant tissue and untreated wood wastes in the open	3	10 tpa
T1	Cleaning, washing, spraying or coating relevant waste	2	1,200 tpa
T2	Recovery of textiles	4	2,000 tpa
T4	Preparatory treatments (baling, sorting, shredding etc	10	5,000 tpa
T6	Treatment of waste wood and waste plant matter by chipping, shredding, cutting or pulverising	7	2,000 tpa
T8	Mechanical treatment of end-of-life tyres	0	60 tpa
T9	Recovery of scrap metal	7	2,500 tpa
T11	Repair or refurbishment of WEEE	0	500 tpa

Paragraph No.	Description	Number of exemptions	Assumed capacity for each exemption
T12	Manual treatment of waste	1	60 tpa
T16	Treatment of waste toner cartridges and waste ink cartridges by sorting, dismantling, cleaning or refilling	1	50 tpa
T18	Dewatering using flocculants	1	150 tpa
T19	Physical and chemical treatment of waste edible oil and fat to produce biodiesel	1	100 tpa
T23	Aerobic composting and associated prior treatment	8	400 tpa
T25	Anaerobic digestion at premises not used for agriculture and burning of resultant biogas	2	1000 tpa
U2	Use of baled end-of-life tyres in construction	1	50 tpa
U4	Burning of waste as a fuel in a small appliance	3	10 tpa
U8	Use of waste for a specified purpose	3	250 tpa
U9	Use of waste to manufacture finished goods	1	2,500 tpa
U10	Spreading waste on agricultural land to confer benefit	3	200 tpa
U11	Spreading waste on non-agricultural land to confer benefit	4	200 tpa
U12	Use of mulch	4	600 tpa
Total assumed C&I waste capacity at exempt facilities			**12,630 tpa**
U1	Use of Waste in Construction	1	600 tpa[16]
Total assumed C&D waste capacity at exempt facilities			**600 tpa**

Summary of Existing Waste Management Capacity

5.14 Tower Hamlets' existing waste management capacity is summarised in the table below.

Table 5.3: Existing waste management capacity in Tower Hamlets (tonnes)

Source	LACW/C&I capacity	C&D capacity
Existing licenced waste sites	2,000	0
Exempt waste sites	12,630	600
Total	**14,630**	**600**

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

6. New Waste Management Capacity

6.1 There is a significant gap between existing waste management capacity in Tower Hamlets and the Borough's need for capacity to manage waste generated in its area.

6.2 New waste capacity can come from a number of sources including the upgrading existing facilities. There are also non-operational or vacant safeguarded waste sites that can be brought back into waste use and contribute towards future need. Pipeline capacity is another source; sites with planning permission for a new waste facility or intensification of an existing facility. Lastly, new waste sites can be submitted by operators or developers during the Local Plan preparation and can be identified and safeguarded for future waste use. London Plan Policy SI8 requires boroughs to provide capacity to meet apportionment targets and other waste needs by maximising existing waste sites, identifying Strategic Industrial Locations and Locally Significant Industrial Sites as suitable locations for new facilities, and safeguarded wharves with an existing or future potential for waste. These waste capacity sources for Tower Hamlets are set out below.

Existing licenced waste sites

6.3 London Plan policy SI9 requires all existing waste sites to be safeguarded and retained in waste use. Existing waste sites are defined in the London Plan as land with planning permission for a waste use or a permit from the Environment Agency for a waste use. There are three existing waste sites in Tower Hamlets (see Table 6.1 and Appendix A) and these should be identified and safeguarded in the Borough's Policies Map.

6.4 Tower Hamlets does not have any recycling or treatment facilities which contribute towards "managing" waste. Although transfer capacity does not contribute towards 'managing waste', many facilities categorised as Waste Transfer Station (WTS) undertake some bulking ready for reuse/recycling. Northumberland Wharf facility in Tower Hamlets undertakes a small amount of bulking (up to 2,000 tonnes per annum) ready for reuse/recycling.

6.5 The London Plan makes it clear that waste management capacity of existing sites should be optimised. The three current operators - Cory (Northumberland Wharf), Clifford Devlin (Towcester Road) and J B Riney (455 Wick Lane) - were all contacted for comment on plans for their facilities. There is currently only one operational facility in Tower Hamlets, Northumberland Wharf and this is primarily a waste transfer station so any increase in throughput would not contribute to capacity for waste management. J B Riney (455 Wick Lane) have confirmed that they are no longer operating the inert waste transfer station but that they still retain the permit and option to transfer waste at the site in the future. However, as already noted, a waste transfer station would not contribute to waste 'management' capacity in Tower Hamlets. No reply was received from Clifford Devlin.

Pipeline capacity

6.6 There are no known plans for any new waste facilities in Tower Hamlets and no new waste sites have been put forward by operators during the Call for Sites.

Summary of existing capacity and potential capacity

6.7 A summary of capacity from existing licenced and exempt facilities, and potential capacity from non-operational waste sites and pipeline facilities is set out in Table 6.1.

Table 6.1: Existing and potential waste management capacity in Tower Hamlets (tonnes)

Capacity source	LACW/C&I recycling capacity	C&D recycling capacity
Existing licenced waste sites	2,000	0
Exempt waste sites	12,630	600
Total existing capacity	**14,630**	**600**
Intensification of existing facilities	0	0
Non-operational waste sites	0	0
Pipeline capacity	0	0
New sites	0	0
Total potential capacity	**0**	**0**

Identification of Land to Meet Capacity Gaps

6.8 Boroughs must allocate sufficient land and identify waste management facilities to provide the capacity to manage their apportioned tonnages of waste. Different types of waste facilities need different size sites; as a general rule, the higher up the waste hierarchy the more land is needed.

6.9 Given the challenging recycling targets set out in the London Plan, new recycling capacity should be welcomed. However, Tower Hamlets has considerable constraints for waste operators including limited industrial land, high land values, sensitive neighbouring uses, ULEZ and air quality, likely limits on vehicle movements and operating hours, and poor access to major road networks. It is therefore difficult for a Local Plan to persuade operators to locate in the Borough or to influence the type of capacity coming forward.

6.10 Tower Hamlets commissioned an Employment Land Review (ELR) which was finalised in March 2023. The purpose of the ELR is to provide a robust evidence base and associated policy recommendations to assist the Borough in the development of policies and strategic designations in the new Local Plan.

6.11 The ELR notes that the stock of industrial space in Tower Hamlets has halved since the millennium. The loss of industrial stock has mirrored a London-wide trend; but the local picture is exacerbated by losses of capacity from land designated for its employment use, principally to high density residential development. While the ELR

recommends that Tower Hamlets' Local Plan must provide strong, unequivocal policies to safeguard industrial land and premises, in order to ensure that adequate space is available to meet need, the loss of industrial land and the encroachment of sensitive neighbouring uses has a big impact on the ability of the council to identify sites and areas suitable for new waste uses.

6.12 Generally, waste uses fall under the B use class category or sui generis and industrial locations are appropriate, in principle, for waste uses.

6.13 The Borough has two Strategic Industrial Locations: Empson Street SIL (10.07ha) and Fish Island (South) SIL (8.91ha) which is currently within the LLDC area.

6.14 The Employment Land Review notes that Empson Street SIL has low vacancy and supports industrial uses and warehousing as intended by the site's SIL designation. Overall the site is struggling to conform to the London Plan's vision of Strategic Industrial land. It has witnessed conversion of space for creative sector uses which, although technically B1c under the former Use Classes Order the erosion of nearby industrial uses in favour of higher density housing, means that the core of the SIL is losing its critical mass. It is questionable whether, over the life of the emerging Local Plan, the area can retain its SIL designation. It is also debatable whether retaining a SIL designation makes best use of the site or possibly hinders regeneration. That said it remains a busy area, and SIL designation offers strong protection. If the SIL designation were to be reconsidered, then there is a strong case for ensuring that parts of the site are designated for more intensive light industrial and service uses within a mixed use approach and which can protect opportunities for local employment.

6.15 The Employment Land Review notes that Fish Island SIL comprises a range of significant B2 and B8 activities, including industrial, warehousing, transport, waste management and distribution; as well as a safeguarded rail head and associated bulk freight distribution use. Uses should make effective use of the railhead, including potential for aggregate distribution and for concrete batching, the manufacture of coated materials, other concrete products and handling, processing and distribution of or aggregate material. There is a potential for intensification through modernisation of facilities, development of multi-storey schemes and more efficient use of land through increased plot ratios.

6.16 Both SILs are identified in Tower Hamlets' Local Plan as being suitable locations for new waste facilities and it is recommended that this designation is taken forward into the next Local Plan.

6.17 Tower Hamlets has a number of Locally Significant Industrial Sites, known in Tower Hamlets as Local Industrial Locations (LIL). One of these, The Highway LIL (2.71ha), is identified in Tower Hamlets' Local Plan as being a suitable location for new waste facilities. The five other LILs are not considered suitable for new waste uses due to their poor connectivity and constrained access for large vehicles, and the proximity to sensitive uses such as residential dwellings.

6.18 Tower Hamlets has two safeguarded wharves: Orchard Wharf and Northumberland Wharf. Northumberland Wharf includes waste transfer station run by Cory and is therefore considered suitable for waste uses. The land near Orchard Wharf has been redeveloped for residential-led mixed use but the wharf itself is still intact and there is an extant permission[17] for the site for a concrete batching plant, cement storage terminal and aggregate storage facilities, together with associated, jetty and ship to shore conveyor. There is the potential for this site to recycle C&D waste to produce aggregates.

Amount of Land Required to Meet Capacity Gaps

6.19 In order to calculate the amount of land required to meet the Borough's waste needs, an appropriate 'throughput per hectare' methodology can be applied. For the LACW/C&I waste streams, the GLA used 80,000 tonnes per hectare which is an average of all types of waste facilities including transfer stations which do not 'manage' waste and have a much higher throughput than other types of facility. The Environment Agency have suggested that 60kt per hectare is more realistic. However, a typical materials recycling facility in London can manage the equivalent of around 128,000 tonnes per hectare and demonstrates a higher throughput per hectare can be achieved for the LACW/C&I waste streams. For CD&E waste a typical throughput per hectare is 100,000 although, again, it depends on the technology used.

6.20 Table 6.2 sets out how much land will be required using both 60ktph and 128ktph to calculate how much land is needed to meet the capacity in Tower Hamlets. This is indicative only as technologies will change and improve over the plan period. Capacity rather than land-take should be the measure for monitoring purposes.

Table 6.2: Indicative land required to meet Tower Hamlets' waste management need (hectares)

	2026	2031	2036	2041
LACW and C&I (60ktph)	3.1	3.1	3.2	3.2
LACW and C&I (128ktph)	1.4	1.5	1.5	1.5
C&D (100ktpa)	2.8-4.6	2.8-4.6	2.8-4.6	2.8-4.6

6.21 Tower Hamlets cannot itself deliver new waste capacity, but can create opportunity through its Local Plan policies for the market to bring forward new waste capacity. It can do this by identifying the most suitable locations for new waste management capacity. The three industrial locations identified as being suitable locations for new waste facilities have a combined area of 21.7ha which could accommodate a waste facility or facilities to meet the borough's identified need. Individual sites are expected to become available within these areas through business churn. It should be noted that for most waste streams, market demands dictate where the waste is managed.

[17] PA/11/03824/R

Suitable Types of New Waste Facilities

6.22 National Planning Policy for Waste (NPPW) requires waste planning authorities to "identify the broad type or types of waste management facility that would be appropriately located on the allocated site or in the allocated area in line with the waste hierarchy, taking care to avoid stifling innovation" (part 4).

6.23 Some types of waste facilities are not appropriate in Tower Hamlets due to their impact on the dense urban environment, including the visual impact from large scale facilities, noise, dust, and odour. Facilities not considered appropriate include landfill, energy from waste facilities, and open windrow composting. Some facilities will only be appropriate where they are located away from residential development and other sensitive receptors. These include Mechanical biological treatment (MBT) and Anaerobic Digestion due to potential issues with odour, construction/demolition waste and metal recycling which can be noisy and/or dusty. Any new facility in Tower Hamlets which has the potential to impact on amenity through noise, dust, odour, litter and vermin will need to be enclosed. Policies in both the NPPW and the London Plan require developers of new waste sites to address these issues as part of any application.

6.24 The broad types of waste facility suitable for Tower Hamlets are set out in Table 6.3, along with their level in the waste hierarchy, an estimated average throughput per hectare, and a summary of the potential issues and mitigation measures to consider.

Table 6.3: Broad types of waste facilities suitable in Tower Hamlets

	Type of Facility			
	Repair and Reuse	**Recycling and Reprocessors**	**Treatment**	**Collection and handling**
Estimated throughput per hectare	200 tonnes	60,000 tonnes	60,000 tonnes	60,000 tonnes
Level in the waste hierarchy	"Preparing for Re-use"	"Recycling"	"Other recovery"	Sorting for onward journey to other facility
Example facility	Small-scale repair and refurbishment workshop	Materials recovery facility, metal recycling, vehicle depollution	Mechanical biological treatment (MBT	Transfer station
Potential issues	Safe access for residents	Vehicle movements	Odour, vehicle movements	Noise, dust, litter, vehicle movements
Mitigation measures	• Enclosed facility • Appropriate and well-maintained and managed equipment and vehicles • Smaller scale • Restrictions to operating hours	• Enclosed facility • Suitable road access • Appropriate and well-maintained and managed equipment and vehicles. • No putrescible waste • Smaller scale • Restrictions to operating hours	• Enclosed facility • Locate away from sensitive receptors • Suitable road access • Appropriate and well-maintained and managed equipment and vehicles • Smaller scale • Restrictions to operating hours	• Enclosed facility • Locate away from sensitive receptors • Suitable road access • Appropriate and well-maintained and managed equipment and vehicles. • No putrescible waste • Smaller scale • Restrictions to operating hours

7. Waste Exports and Imports

7.1 Tower Hamlets exports almost all its waste to be managed because its waste capacity needs cannot be met within the authority area. Local planning authorities have a duty to cooperate with each other on strategic matters that cross administrative boundaries. Exports of waste from one waste planning authority to another is a strategic cross-boundary matter and is an important consideration in assessing the effectiveness of the Local Plan. It is therefore important to understand the destination of Tower Hamlets' waste exports.

Summary of waste exports

7.2 The primary source of data on waste exports is the Environment Agency's Waste Data Interrogators (WDIs). The data sources include information about the amount of waste received at a particular site and the origin of that waste. However, the accuracy of this data is not perfect and the limitations are well known, as mentioned above. Notwithstanding this, these are the best available data sources for movements of waste and are used as the starting point for co-operation with other waste planning authorities receiving Tower Hamlets' waste.

7.3 Table 7.1 summarises the type of waste recorded by the Waste Data Interrogator (WDI) and Hazardous Waste Data Interrogator (HWDI) as being exported from Tower Hamlets over the last five years.

Table 7.1: Recorded exports from Tower Hamlets by waste type 2017-2021 (tonnes)

Waste type	2017	2018	2019	2020	2021
LACW/C&I (WDI)	16,829	7,608	26,611	39,768	20,135
CDE (WDI)	442,159	631,107	624,638	346,566	311,026
Hazardous (WDI)	670	1,845	4,230	3,057	1,285
Hazardous (HWDI)	16,795	12,939	31,097	14,138	15,360

Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2017-2021

7.4 Information on movements of C&I and CD&E waste relies on the WDI and it is acknowledged that not all waste exported from Tower Hamlets is captured by this data source. However, data for local authority collected waste (LACW) are also collected by local authorities and collated by Defra so it is possible to gather more information on this waste stream and combine this with knowledge about where it is managed to support duty to co-operate discussions.

7.5 The government publishes annual reports on LACW[18] and this data can be used to understand more about where this waste stream is managed. Table 7.2 shows how much LACW is recycled and how much is not recycled.

[18] Statistical data set ENV18 - Local authority collected waste: annual results tables

Table 7.2: LACW management 2016/17-2020/21 (tonnes)

	2016/17	2017/18	2018/19	2019/20	2020/21
LACW sent for recycling-composting-reuse	25,306	23,123	21,238	20,094	20,970
LACW not sent for recycling	91,398	89,936	89,252	88,387	87,484
Total	116,704	113,059	110,490	108,481	108,454

Source: ENV18: Local authority collected waste: annual results tables - Local authority collected waste generation from April 2000 to March 2021 (England and regions) and local authority data (Table 1)

7.6 A specific example of the limitations of the WDI pertinent to Tower Hamlets is that Defra data for 2020/21 (Table 7.2) shows a total of 108,454 tonnes of LACW arising in Tower Hamlets'. However, this amount of waste originating in Tower Hamlets is not accounted for in the WDI (Table 7.1). This might be because it has been recorded as originating in 'London' or a similar category which doesn't attribute waste to a particular waste planning authority.

7.7 Tower Hamlets' residual LACW is managed at Cory's Riverside Energy Recovery Facility (ERF) in Bexley and recyclables are sorted at Bywaters Materials Recovery Facility (MRF) in Newham. It can therefore be assumed that the 'non-recycled' figures in Table 7.2 are approximately the amount of waste managed at the ERF and the 'recycled' figure is the amount send to the MRF.

7.8 For the duty to co-operate it is important to establish the destination of 'strategic' movements of waste exports from Tower Hamlets. Tower Hamlets' waste exports which leave London are mostly received in the wider south east (WSE) region. It is therefore appropriate to use the guideline thresholds to indicate 'strategic' waste movements which have been agreed by the WSE waste planning authorities, including the London Boroughs. The guideline thresholds are:

- Non-hazardous waste (LACW/C&I) – more than 5,000 tonnes per annum
- Hazardous waste - more than 100t per annum
- Inert waste (CD&E) - more than 10,000t inert per annum

7.9 It is important to demonstrate that Tower Hamlets' waste can continue to be exported throughout the plan period. Waste Planning Authorities (WPAs) who have received strategic amounts of Tower Hamlets' waste over the past five years are set out below. Data on waste exports has been separated by type of waste: LACW and C&I (apportioned) waste, CD&E waste and hazardous waste.

7.10 Table 7.3 shows 'strategic' LACW and Commercial & Industrial waste exports over 2,500tpa over the last five years. The source of this data is the Environment Agency's Waste Data Interrogator (Set out in Table 7.1)) supplemented by data from Defra's annual results table (set out in Table 7.2). The WDI groups these two waste streams together as "HIC" (household, industrial and commercial) and it is therefore not possible to say what proportion of the waste is LACW or C&I. Further details about which sites these exports are received at is set out in Appendix C.

Table 7.3: Tower Hamlets' recorded LACW and C&I waste exports over 2,500tpa 2017-2021 (tonnes)

WPA	2017	2018	2019	2020	2021
Bexley	91,398	89,936	89,252	88,387	87,484
Newham (WDI)	1,445	1,319	10,870	14,301	15,133
Newham (ENV18)	25,306	23,123	21,238	20,094	20,970
Buckinghamshire	0	0	0	4,584	0
Waltham Forest	1,391	1,151	3,906	586	386

Source: Waste Data Interrogator and ENV18 Tables 2017-2021

Inert (CD&E) waste exports

7.11 Table 7.4 shows strategic Inert (CD&E) waste exports over 5,000tpa over the last five years. Further details about which sites these exports are received at is set out in Appendix C.

Table 7.4: Tower Hamlets' recorded Inert (CD&E) waste exports over 5,000tpa 2017-2021 (tonnes)

WPA	2017	2018	2019	2020	2021
East London (Havering)	54,378	45,772	41,797	12,133	75,248
East London (Newham)	7,622	10,031	59,587	39,648	38,436
East London (Barking and Dagenham)	4,536	2,898	0	31,249	4,706
Buckinghamshire	140,927	393,195	268,945	114,071	27,623
Essex	100,957	23,348	17,758	25,864	22,679
Greenwich	16,781	23,564	18,195	29,229	41,858
North London (Enfield)	4,470	8,268	9,474	5,645	10,019
Thurrock	108,990	114,195	190,871	75,983	80,505

Source: Waste Data Interrogator 2017-2021

Hazardous waste exports

7.12 There are two sources of data for hazardous waste exports. The Hazardous Waste Data Interrogator (HWDI), which provides more accurate information on the amounts of waste but not the destination, and the Waste Data Interrogator which includes the destination facility, but is less accurate about the quantities of waste. Table 7.5 provides figures from the HWDI only but information from both data sources can be found in Appendix C.

Table 7.5: Hazardous waste exports over 100tpa from Tower Hamlets 2017-2021 (tonnes)

WPA	2017	2018	2019	2020	2021
Bexley	690	539	488	357	324
Cambridgeshire	2,886	1,269	1,991	203	72
Essex	175	209	220	181	300
Hammersmith and Fulham	39	143	143	144	143
Havering	176	122	71	178	21

WPA	2017	2018	2019	2020	2021
Kent	923	545	803	873	676
Newham	2,973	3,915	10,045	734	2,797
Northamptonshire	3,644	43	1,744	1,328	1,827
Peterborough	22	96	121	77	167
Sandwell	10	992	2,490	1,570	129
Surrey	1,090	216	428	354	83
Thurrock	59	55	11,633	7,472	7,906
Bexley	690	539	488	357	324

Source: Hazardous Waste Data Interrogator 2017-2021

Waste Imports

7.13 Table 7.6 is a summary of all waste imports over the last five years. A significant amount of waste is imported from elsewhere in London to the Borough's transfer stations before its onward journey to be managed at other facilities.

Table 7.6: Waste imports to Tower Hamlets 2017-2021

Origin	Site	Waste Type	2017	2018	2019	2020	2021
East London Waste Authority	Northumberland Wharf Transfer Station	HIC	-	-	-	109,017	142,940
WPA not codeable (London, South London)	Northumberland Wharf Transfer Station	HIC	148,215	153,766	158,181	-	-
WPA not codeable (London, South London)	J B Riney & Co Ltd	CDE	64,610	3,849	1,705	-	-
Various	Towcester Road	Hazardous	259	163	110	107	0
Total			**220,868**	**161,350**	**159,996**	**109,125**	**142,940**

Source: Waste Data Interrogator 2017-2018

Duty to Co-operate

7.14 The Duty to Co-operate requires Tower Hamlets "to engage, constructively, actively and on an on-going basis" with prescribed public bodies in the preparation of development plan documents "so far as relating to a strategic matter". The National Planning Policy Framework (NPPF) includes infrastructure for waste management as one of the strategic policy areas.

7.15 Waste is a strategic cross-boundary issue and is currently subject to the duty to co-operate. In order for the Local Plan to be found sound, statements of common ground will be needed to demonstrate effective and on-going joint working with recipient authorities on waste exports from Tower Hamlets.

7.16 It should be noted that the government intends to repeal the duty to co-operate in its current form, but it is likely that waste planning authorities will continue to engage with each other on issues of strategic importance. It is recommended that Tower Hamlets attends the London Waste Planning Forum and keep up to date on changes to the duty to co-operate and how this impacts waste planning.

7.17 A key issue for cross-boundary movements of waste is the declining landfill void space. Some of Tower Hamlet's CD&E exports are received at East Tilbury Quarry in Thurrock and Rainham Landfill in Havering, both of which are due to close during the plan period (in 2021 and 2024 respectively). The market is already finding an alternative destination for Tower Hamlets' CD&E waste currently deposited at Rainham Landfill and will need to do the same for East Tilbury Quarry. In line with the new London Plan requirement for Circular Economy Statements, the target of 95% beneficial use for excavation waste and 95% reuse/recycling/recovery of C&D waste, developers will need to manage CD&E waste as high up the waste hierarchy as possible, diverting it away from landfill where possible.

7.18 There is approximately 46 million m^3 of inert landfill voidspace in the wider south east region[19]. In terms of future landfill capacity, it is not possible to know how quickly void space in London, South East and East of England will be used up. This will depend on the type and amount of waste produced in the surrounding area, for example from major infrastructure projects such as the Northern Line extension, High Speed 2 and Thames Tideway Tunnel. However, it is acknowledged that landfill capacity in the wider south east is declining and few new landfill sites are currently being put forward by waste operators. While new landfill sites could come forward during the plan period, declining landfill capacity in the wider south east is an issue for all waste planning authorities preparing plans. It is also recognised that Tower Hamlets' waste will have to compete against waste from large-scale infrastructure projects and other authorities for landfill void space. Generally, WPAs agree that landfill void space in the wider south east represents sufficient opportunity for the market to find an alternative destinations in the short term but that an inter-regional or national study is required to assess landfill need in the longer term.

7.19 Until the duty to co-operate is repealed, Tower Hamlets will need to demonstrate to an Inspector that cross boundary strategic matters on waste have been "dealt with rather than deferred". Landfill capacity is a particular area of scrutiny for Inspectors and evidence will be sought that there is available void space to meet Tower Hamlets' identified needs. Landfill void space capacity can be identified through the Environment Agency dataset and any supplementary information from waste planning authorities.

[19] Remaining Landfill capacity dataset, Environment Agency (January 2023)

7.20 Tower Hamlets will need to engage on this matter with the recipient waste planning authorities through the duty to co-operate and monitor waste exports in the future to see if there are significant changes to the amounts or destinations.

8. Options and Recommendations

8.1 This section takes the findings of the waste evidence base work and proposes a number of options to meet the requirements of the NPPW and the London Plan.

Meeting Apportionment Targets

8.2 While this Study identifies industrial areas suitable for new waste facilities, Tower Hamlets has a number of constraints for waste operators and meeting the borough's apportionment targets will be a challenge.

8.3 It is recommended that Tower Hamlets continue dialogue with the GLA on how the borough can meet its apportionment targets.

8.4 Several groups of Boroughs work together on waste planning in London and there may be an opportunity for Tower Hamlets to join one of these groups, or to make an arrangement with one of these groups, to help meet its waste capacity needs, including the apportionment target. These opportunities are set out below.

East London Boroughs

8.5 The East London Boroughs of Barking & Dagenham, Havering, Newham and Redbridge, work collectively to plan for waste and prepared the East London Waste Plan which was adopted in 2012. The East London Waste Plan (ELWP) is due to be updated and an East London Waste Plan Evidence Base (December 2022) has been prepared to support a new ELWP.

8.6 The East London Waste Evidence Base shows that collectively the Boroughs have surplus capacity for LACW/C&I (apportioned waste) of 332,685 tonnes in 2021 and 262,430 tonnes by 2041. This is sufficient to meet Tower Hamlets' apportionment target of 207,000 by 2041.

8.7 In the first half of 2023, Tower Hamlets met with the East London Boroughs to request that Tower Hamlets join the East London Boroughs in preparing the ELWP and/or that the East London Boroughs allow Tower Hamlets to use the surplus capacity to meet their apportionment targets.

8.8 The East London Boroughs have considered Tower Hamlets' proposal to join the grouping but have concluded that this approach would cause delays to the progress of the ELWP. This decision was based on the established nature of the East London group of authorities, which has political agreement from each of the boroughs.

8.9 It is therefore recommended that Tower Hamlets write to the East London Boroughs and the GLA as part of the Duty to Co-operate to request that that the compensatory capacity provided in the London Borough of Barking & Dagenham (at total of 26,353 tonnes) be protected and 'transferred' back to Tower Hamlets, in line with paragraph

9.8.7 of the London Plan[20]. This could be achieved through a Statement of Common Ground.

North London Boroughs

8.10 The North London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest work collectively to plan for waste and have prepared the North London Waste Plan (NLWP) which was adopted by all North London Boroughs in 2022.

8.11 The North London Waste Plan (NLWP) aims to meet net self-sufficiency which is above the amount of capacity required to meet the London Plan's apportionment targets. The NLWP Annual Monitoring Report (AMR) shows that North London has around 1,651,700 tonnes of LACW/C&I waste management capacity and is therefore able to meet the London Plan 2021 apportionment target of 1,307,000 tonnes and the 2041 target of 1,389,000 tonnes. There is 344,700 tonnes of waste management capacity in 2021 and 262,700 by 2041 above that required to meet the collective London Plan apportionment targets for the North London Boroughs. This is sufficient to meet Tower Hamlets' apportionment target of 207,000 by 2041.

8.12 Tower Hamlets could approach the North London Boroughs for Tower Hamlets to use some of North London's waste management capacity to meet Tower Hamlets' apportionment targets. An arrangement with the North London Boroughs would enable that Tower Hamlets to demonstrate that its waste apportionment targets are being met and that the new Local Plan is in conformity with the London Plan.

South East London Boroughs

8.13 The South East London Boroughs of Bexley, Bromley, Lewisham, Greenwich, Southwark and the City of London plan for waste together. Collectively they prepare a Joint Waste Technical Paper for each Boroughs to support the Local Plan submission. Bexley's draft Local Plan is supported by a Waste Technical Paper (April 2022) which identifies a surplus capacity of 275,186 tonnes in 2021 and 244,382 tonnes by 2041 from existing facilities. There is also an additional 745,000 tonnes of pipeline capacity which may be developed as part of Cory's granted CDO application for a new EfW facility in Bexley.

8.14 Tower Hamlets could approach the London Borough of Bexley for Tower Hamlets to use some of its waste management capacity to meet Tower Hamlets' apportionment targets. Bexley has formally accepted responsibility for meeting the waste management capacity for London Plan waste apportionment requirements identified for the City of London and City of Westminster. All the SE London Boroughs in the group, not just Bexley, would need to agree a similar approach to Tower Hamlets' apportionment capacity gap. An arrangement with the South East London Boroughs would enable that

[20] Paragraph 9.8.7 states "It may not always be possible for boroughs to meet their apportionment within their boundaries and in such circumstances boroughs will need to agree the transfer of apportioned waste."

Tower Hamlets to demonstrate that its waste apportionment targets are being met and the new Local Plan is in conformity with the London Plan.

Construction, Demolition & Excavation Waste

8.15 While this Study identifies industrial areas suitable for new waste facilities, Tower Hamlets has a number of constraints for waste operators and meeting the borough's CD&E waste needs will be a challenge. It is therefore recommended that the borough engage on this matter with the recipient waste planning authorities through the duty to co-operate to ensure that exports of CD&E waste can continue in the short to medium term while Circular Economy Material Hubs are established.

Local Plan Policy Recommendations

8.16 It is recommended that the new Local Plan retains and strengthens Policy S.MW1 Managing our waste. The list of existing waste sites will need to be updated to remove McGrath. Existing waste sites are safeguarded and should continue to be identified in the Policies Map. Locations suitable for new waste facilities should also be identified in the Local Plan.

8.17 Part 4 of Policy S.MW1 requires developers to deliver compensatory capacity on a suitable replacement site within the borough in the first instance or another part of London. The McGrath example above shows that this policy is not sufficient to retain existing capacity within the borough. It is recommended that the council consider strengthening this part of the policy and supporting text in the new Local Plan. One option would be to require developers to provide compensatory waste capacity within the borough. This is an approach taken by many other London Boroughs to retain waste capacity within their administrative area, in particular those boroughs who have a capacity gap to meet their need. A second option would be to ensure that developers demonstrate that they have sought a replacement site within the borough before a site outside Tower Hamlets is accepted for replacement capacity.

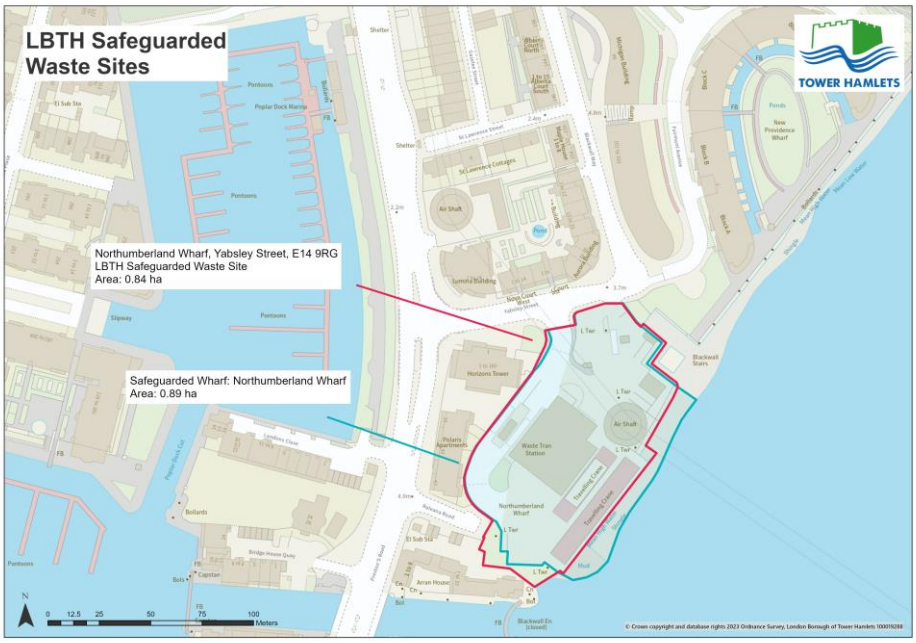
Monitoring and Duty to Co-operate

8.18 Tower Hamlets will continue to rely on waste facilities outside its administrative boundaries and will need to engage with authorities who receive strategic amounts of waste from Tower Hamlets to ensure that this can continue. As part of the new Local Plan it is recommended that Tower Hamlets write to the recipients of Tower Hamlets' 'strategic' waste exports to tell them how the authority is planning for waste and to ask if there any planning reasons why the current pattern of waste flows cannot continue.

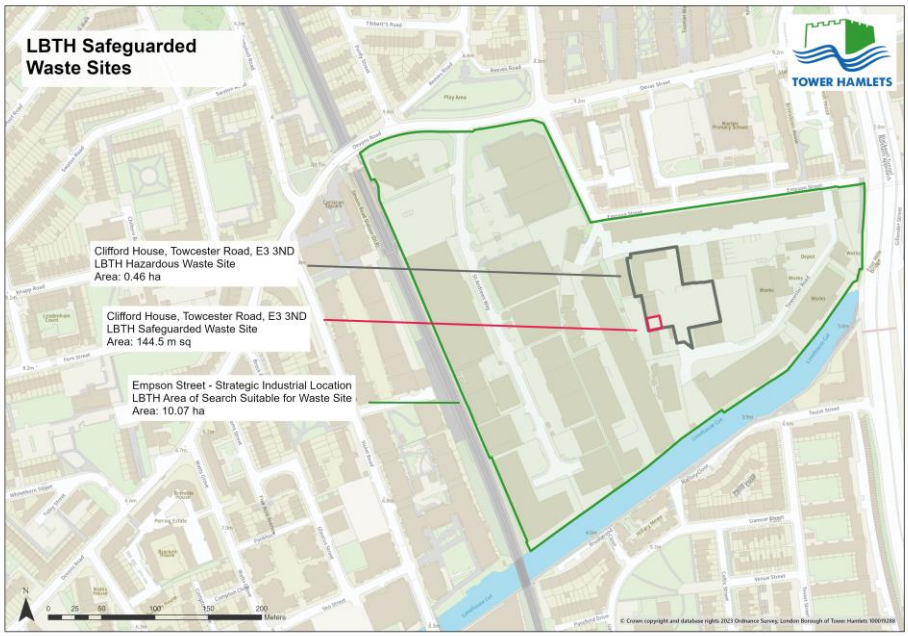
8.19 It is recommended that monitoring of waste exports is undertaken regularly and if there are significant changes to the amounts or destinations of Tower Hamlets' waste exports, the borough will need to engage on this matter with the recipient waste planning authority through the duty to co-operate to ensure that waste exports can continue as planned.

8.20 It is also recommended that the Local Plan include monitoring indicators for new waste management capacity and the loss of waste management capacity.

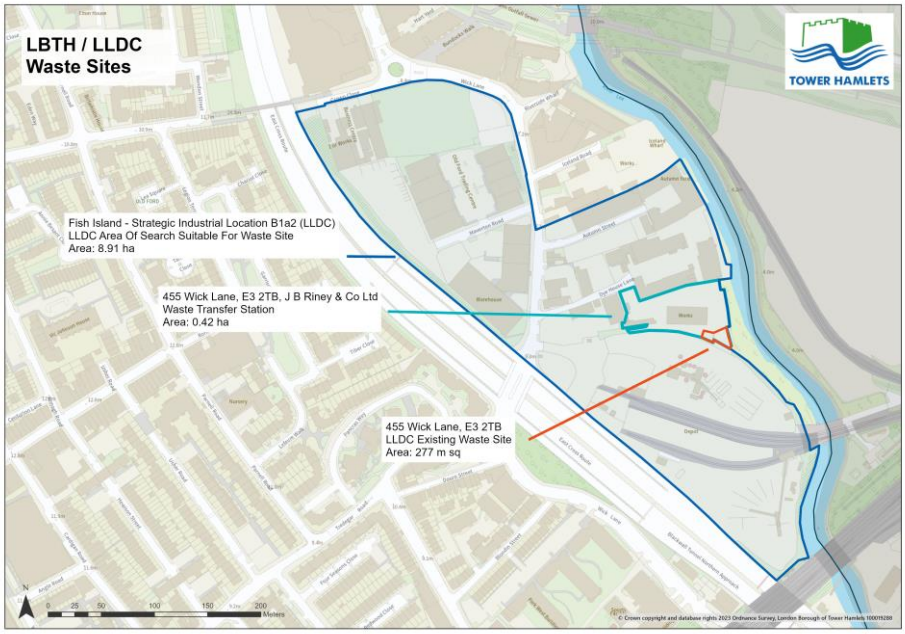
Appendix A: Site Profiles

Site Name:	Northumberland Wharf Transfer Station
Map	
Site address	Northumberland Wharf T S, Yabsley Street, Poplar, London, E14 9RG,
Site Size	0.84ha
OS grid reference	TQ 38488 80341 TQ 38459 80294
Site operator	Cory Environmental Limited
Type of facility	A13 : Household Waste Amenity Site A11 : Household, Commercial & Industrial Waste T Stn
Max throughput	2021 - 142,940 2020 - 108,892 2019 - 158,181 2018 - 153,766 2017 - 151,136
Licensed capacity	24999 19500
Permit number	80133 104101

Site Name:	Northumberland Wharf Transfer Station
Type of waste accepted	LACW/C&I
Management type	Transfer with a small amount of bulking ready for recycling/recovery

Site Name:	Towcester Road
Map	
Site address	Clifford House, Towcester Road, Bow, London, E3 3ND
Site Size	0.01ha
OS grid reference	TQ3794982142
Site operator	Clifford Devlin Ltd
Type of facility	A9 : Hazardous Waste Transfer Station
Max throughput	2021 - 0 2020 - 108 2019 - 112 2018 - 169 2017 - 263
Licensed capacity	1,785

Site Name:	Towcester Road
Permit number	80134
Type of waste accepted	Hazardous
Management type	Transfer

Site Name:	J B Riney & Co Ltd
Map	
Site address	455 Wick Lane, Bow, London, E3 2TB,
Site Size	0.03
OS grid reference	TQ 37425 83573
Site operator	J B Riney & Co Ltd
Type of facility	A14 : Transfer Station taking Non-Biodegradable Wastes
Max throughput	2021 - 0 2020 - 0 2019 - 1,705 2018 - 3,849 2017 - 64,610

Site Name:	J B Riney & Co Ltd
Licensed capacity	49999
Permit number	80137
Type of waste accepted	CDE
Management type	Transfer

Appendix B: Exempt Waste Facilities in Tower Hamlets

Name	Address	Registration Type	Registration Number
Aggregate Industries UK Limited	No address information available	S2	WEX278654
Arcola Theatre Production Company	24, Ashwin Street, London, E8 3DL	U4	WEX287810
AV (Bees) Ltd	261, Wick Road, London, E9 5DG	T28	WEX314779
Balfour Beatty PLC	Duke Shore Wharf, 106 Narrow Street, Limehouse, E14 8BU	U1	WEX256156
Baroness Christianah	52-53 Gillender Street, London, E14 6RN	U16	WEX238248
Baroness Christianah	52-53 Gillender Street, London, E14 6RN	U16	WEX364907
Best Friends Group Limited	43, Amsterdam Road, London, E14 3UU	T28	WEX309051
Borno Chemists Ltd	204, Cambridge Heath Road, London, E2 9NQ	T28	WEX285589
Bow Metals Recycling Ltd	Unit 404-405, St. Pauls Way, London, E3 4AG	S2	WEX363549
Bow Metals Recycling Ltd	No address information available	T9	WEX363534
British American Tobacco UK Ltd	The Ace Corner Shop, 149 - 150 Shoreditch High Street, London, E1 6JN	S2	WEX284032
British American Tobacco UK Ltd	The Ace Corner Shop, 149 - 150 Shoreditch High Street, London, E1 6JN	U9	WEX284029
Brookfield Properties (Uk Pm) Limited	2, Leman Street, London, E1 8FA	T4	WEX343497
Brookfield Properties (Uk Pm) Limited	2, Leman Street, London, E1 8FA	T4	WEX343497

Name	Address	Registration Type	Registration Number
Brookfield Properties (UK PM) Limited	99, Bishopsgate, London, EC2M 3XD	T4	WEX326234
Burdett Metals Ltd	Arch 55, Vallance Road, London, E1 5BW	D6, S2	WEX262512
Burdett Metals Ltd	Arch 55, Vallance Road, London, E1 5BW	T9	WEX288537
Bywaters (Leyton) Limited	No address information available	S1	WEX362000
Clarks Healthcare Ltd	68, Broadway Market, London, E8 4QJ	T28	WEX289117
Clarks Healthcare Ltd	68, Broadway Market, London, E8 4QJ	T28	WEX289117
Clockwork Pharmacy Ltd	No address information available	D6, S1, T28	WEX256725
Clockwork Retail Ltd	No address information available	T28	WEX302622
Cognition Land And Water Limited	No address information available	D1	WEX358789
Cordeve Ltd	361, Commercial Road, London, E1 2PS	T28	WEX311542
Costain Ltd	No address information available	S1, S2, T5, T6, U1	WEX317700
Costain Ltd	No address information available	S1, S2, T5, T6, U1	WEX317706
Damira Dental Studios Limited	No address information available	T28	WEX357206
Damira Dental Studios Limited	No address information available	T28	WEX357204
Date Palm Limited	93, Watney Street, London, E1 2QE	T28	WEX343137
David Barbanel Ltd	4, Watney Market, London, E1 2PR	T28	WEX324974

Name	Address	Registration Type	Registration Number
David Barbanel Ltd	50, Wapping Lane, London, E1W 2RL	T28	WEX255165
David Barbanel Ltd	50, Wapping Lane, London, E1W 2RL	T28	WEX325771
David Barbanel Ltd T/A Dmb Chemist	4, Watney Market, London, E1 2PR	T28	WEX255167
East London NHS Foundation Trust	275, Bancroft Road, London, E1 4DG	T28	WEX259560
Everlasting Pharm Ltd	520, Roman Road, London, E3 5ES	T28	WEX357844
Focus Group Logistics Ltd	Berkeley Homes, South Quay Plaza Project, 183 - 185 Marsh Wall, London, E14 9SH	T4	WEX324030
Focus Group Logistics Ltd	Berkeley Homes, South Quay Plaza Project, 183 - 185 Marsh Wall, London, E14 9SH	T4	WEX324030
Forest Veterinary Centre Ltd	43, Amsterdam Road, London, E14 3UU	T28	WEX327704
G4S Health Services Ltd	Police Station, 182, Bishopsgate, London, EC2M 4NP	T28	WEX260275
Galldris Services Ltd	No address information available	U1	WEX277406
Gheorghe Florin Ion	No address information available	T9	WEX359783
Global Switch Estates 2 Limited	3, Nutmeg Lane, London, E14 2AX	S2, T4	WEX244350
Global Switch Estates 2 Limited	3, Nutmeg Lane, London, E14 2AX	S2, T4	WEX244350
Green Light Pharmacy (Stepney)	Unit 2, Harford Street Multicentre, 115, Harford Street, London, E1 4FG	T28	WEX287216
Greenlight Healthcare Ltd	Green Light Pharmacy, 115 Harford St, London, E1 4FG	T28	WEX271519

Name	Address	Registration Type	Registration Number
Greenlight Healthcare Ltd	Green Light Pharmacy, 2 Hannaford Walk, London, E3 3FF	T28	WEX271527
Greenlight Healthcare Ltd	2, Hannaford Walk, London, E3 3FF	T28	WEX281111
Ground Control Ltd.	The Tower Of London, Tower Hill, London, EC3N 4AB	S1, T23, U11	WEX286909
Hamberley Care 1 Limited	Rosewood House Care home, 82, Redmans Road, London, E1 3DB	T28	WEX337420
HC-One Ltd	17, Dod Street, London, E14 7EG	T28	WEX301341
Hosier Haulage and Waste Disposal Ltd	Unit J, Twelvetrees Crescent, London, E3 3JG	D6, S2	WEX261630
Howden Joinery Limited	3-37, Autumn Street, London, E3 2TT	S2	WEX274821
Hydro Traders Limited	4, Parnham Street, London, E14 7TX	T9	WEX295350
J.B. Riney & Co. Limited	No address information available	S2	WEX295597
J.B. Riney & Co. Limited	No address information available	S2	WEX356273
Jasmi limited	406, Kingsland Road, London, E8 4AA	T28	WEX324655
Keltbray Ltd	The Land Bound by Watts Grove & Gale St, Gale St, Bow, London, E3 3RE	U1	WEX256927
Kent Community Health Foundation Trust	121, WESTFERRY ROAD, LONDON, E14 8JH	T28	WEX264020
Kent Community Healthcare Foundation Trust (KCHFT)	No address information available	T28	WEX272495
KKPR Limited	201, Haggerston Road, London, E8 4HU	T28	WEX319424

Name	Address	Registration Type	Registration Number
KKPR Limited	201, Haggerston Road, London, E8 4HU	T28	WEX363583
Laville Ltd	121, Westferry Road, London, E14 8JH	S1, S2	WEX318632
Laville Ltd T/A Britannia Pharmacy	80, Roman Road, London, E2 0PG	S1, S2	WEX318616
Laville Ltd T/A Britannia Pharmacy	257-259, Poplar High Street, London, E14 0BE	S1, S2, T28	WEX243415
Laville Ltd T/A Britannia Pharmacy	35, Aberfeldy Street, London, E14 0NU	S1, S2, T28	WEX311027
Laville Ltd T/A Britannia Pharmacy	80, Roman Road, London, E2 0PG	T28	WEX243403
Laville Ltd T/A Britannia Pharmacy	Britannia Pharmacy, 257 - 259 Poplar High Street, Poplar, London, E14 0BE	T28	WEX311025
Laville Ltd T/A Britannia Pharmacy	121, WESTFERRY ROAD, LONDON, E14 8JH	T28	WEX243406
LMB Textiles Limited	LMB Textiles Ltd, Unit 5 Maskall Trading Estate, 29 Bidder Street, London, E16 4ST	S1, S2, T2, T4	WEX352104
Lyngold Ltd	557, Roman Road, London, E3 5EL	T28	WEX295432
Marijak Limited	317-319, Mare Street, London, E8 1EJ	T28	WEX255188
Marijak Limited	317-319, Mare Street, London, E8 1EJ	T28	WEX283142
Marijak Ltd	317-319, Mare Street, London, E8 1EJ	T28	WEX290983
Marlborough Highways Ltd	Marlborough Highways Ltd, Hare Row, London, E2 9BY	S1, S2, T5, U1	WEX261330
Medinapharm Limited	104, COLUMBIA ROAD, LONDON, E2 7QB	T28	WEX360387

Name	Address	Registration Type	Registration Number
Medinapharm Limited	104, Columbia Road, London, E2 7QB	T28	WEX360387
Medino Online Limited	Unit C19, Poplar Business Park, Prestons Road, London, E14 9RL	T28	WEX284890
Milestar Limited	141, Homerton High Street, London, E9 6AS	T28	WEX289858
Miraj Pharma Ltd	625-627, Roman Road, London, E3 2RN	T28	WEX262573
Mudchute Park And Farm	Pier Street, London, E14 3HP	D7, S1, S2, T26, T6	WEX264333
Mudchute Park and Farm	No address information available	D7, T23, T6, U1, U10, U11, U12, U13, U8	WEX239925
Mudchute Park and Farm	No address information available	D7, T23, T6, U10, U11, U12, U13	WEX347553
Mymeds Healthcare Ltd	138, Salmon Lane, London, E14 7PQ	T28	WEX352773
National Trust, Sutton House	Sutton House 2-4, Homerton High Street, London, E9 6JQ	T23, U12, U3	WEX271071
Peoples Dispensary for Sick Animals	Veterinary Surgery, 171, Malmesbury Road, London, E3 2DT	T28	WEX361070
Perimart Ltd t/a Britannia Pharmacy	151, East Ferry Road, London, E14 3BT	S1, S2, T28	WEX243401
Pharmaethical Ltd	No address information available	T28	WEX292958
Public Works Limited	No address information available	T13, T23, T25, T26, T6	WEX274894
Queen Mary, University of London	No address information available	T23	WEX267153
Regionchoice Limited	No address information available	T28	WEX348422

Name	Address	Registration Type	Registration Number
Regionchoice Ltd	68, Cambridge Heath Road, London, E1 5QJ	S1, T28	WEX278129
Richard Ehrnreich	122-126, Westferry Road, London, E14 3SG	S2	WEX315431
Rico Logistics	Unit E-F, Twelvetrees Crescent, London, E3 3JG	S2	WEX247208
RW Refrigeration Wholesale	Unit 2, Primrose Works, Stour Road, LONDON, E3 2NT	S2	WEX246102
Sewells Reservoir Construction Limited	No address information available	T5, U1	WEX323570
Siemens Plc Limited	103, Cannon Workshops, 3, Cannon Drive, London, E14 4AS	S1	WEX300918
Sportrack Surfaces Ltd	No address information available	S1, S2, T1, T10, T2, T4	WEX315444
St Joseph Hospice Hackney London	Mare Street, London, E8 4SA	D1, D2, D3, D5, D6, S1, S2, S3, T1, T10, T12, T13, T14, T15, T16, T17, T18, T19, T2, T20, T21, T23, T24, T25, T26, T27, T28, T29, T31, T32, T33, T4, T5, T6, T9, U1, U11, U2, U3, U4, U5, U6, U8	WEX324330
Stepney City Farm	Stepney High Street, London, E1 3DG	T23, T26, U10, U12, U13, U4	WEX323188
Strandhaven Limited	42, Liberty Bridge Road, London, E20 1AS	T28	WEX311835

Name	Address	Registration Type	Registration Number
Tasha Healthcare Ltd	Mayors Pharmacy, 51-53 Bow Road, London, E3 2AD, E3 2AD	T28	WEX285092
Telford Homes Ltd	No address information available	U1	WEX296644
The Children's Scrap Project	137, Homerton High Street, London, E9 6AS	S2, T2, U8	WEX362192
TWO Services Ltd	Unit 2, Poplar Business Park, 10 Prestons Road, Poplar, E14 9RL	S1, S2	WEX298059
Unipharm Limited	Unipharm Pharmacy, 253 Kingsland Road, London, E2 8AN	T28	WEX351012
Unipharm Limited	253, Kingsland Road, London, E2 8AN	T28	WEX360386
Vodafone	32-40, DOCK STREET, LONDON, E1 8NA	S1, S2	WEX245240
Westmidian Limited	47, Kingsland High Street, London, E8 2JS	T28	WEX330746
York Metals Limited	No address information available	T9	WEX238363
York Metals Limited	No address information available	T9	WEX365984

Appendix C: Exports Tables

The following are up-to-date tables for each waste planning authority which received waste exports from Tower Hamlets over the thresholds to indicate 'strategic' waste movements over the last five years. These tables can be used for duty to co-operate engagement.

Tower Hamlets' waste exports to Barking & Dagenham (East London) 2017-2021

Site name	Site type	Waste	2017	2018	2019	2020	2021
Barking Riverside Recycling Centre	Treatment	CDE	0	2,624	0	28,824	4,403
Other	All	All	4,554	278	734	3,248	861
All			4,554	2,902	734	32,072	5,264

Source: Waste Data Interrogator 2017-2021

Tower Hamlets' waste exports to Bexley 2017-2021 (tonnes)

Facility	Type of Waste	2017	2018	2019	2020	2021
Riverside Energy Recovery Facility	LACW/C&I	91,398	89,936	89,252	88,387	87,484

Source: ENV18 - Local authority collected waste: annual results tables 2017-2021

Hazardous waste exports to Bexley (tonnes) 2017-2021

Site	Source	2017	2018	2019	2020	2021
Incineration without energy recovery	HWDI	120	183	0	185	185
Recovery	HWDI	559	338	233	134	111
Other	HWDI	12	18	0	38	28
9 Optima Park	WDI	0	0	0	6	20

Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2017-2021

Tower Hamlets' waste exports to Buckinghamshire (tonnes) 2017-2021

Site name	Site type	Waste	2017	2018	2019	2020	2021
Calvert Landfill Site - Pit 6 -	Landfill	CDE	140,916	319,424	260,632	114,071	27,613
Calvert Landfill (Pits 4&5)	Landfill	CDE	3	73,771	0	0	0
Other	All	All	8	0	8,313	4,584	10
All			140,927	393,195	268,945	118,655	27,623

Source: Waste Data Interrogator 2017-2021

Hazardous waste exports to Cambridgeshire & Peterborough (tonnes) 2017-2021

Site	Source	2017	2018	2019	2020	2021
Landfill	HWDI	570	815	1,150	139	167

		22	96	121	77	39
Recovery	HWDI	2,311	447	818	56	2
Other	HWDI	5	8	9	8	30
Thornhaugh Landfill Site	WDI	0	18	0	0	0

Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2017-2021

Tower Hamlets' Waste exports to Enfield (North London) 2017-2021 (tonnes)

Site name	Site type	Waste	2017	2018	2019	2020	2021
Pegamoid Site	Transfer	CDE	4,429	8,120	9,250	5,308	7,060
Other	All	All	42	148	224	343	3,059
All			4,471	8,268	9,474	5,651	10,119

Source: Waste Data Interrogator 2017-2021

Tower Hamlets' Waste exports to Essex 2017-2021 (tonnes)

Site name	Site type	Waste	2017	2018	2019	2020	2021
Highwood Quarry Inert Landfill	Landfill	CDE	3,381	4,519	12,300	13,486	20,377
Pitsea Landfill	Landfill	HIC CDE	101,683	0	0	0	0
Dollymans Farm	Landfill	CDE	0	0	0	10,770	0
Other			79	18,896	5,519	1,634	2,351
All			105,143	23,415	17,819	25,890	22,728

Source: Waste Data Interrogator 2017-2021

Hazardous waste exports to Essex (tonnes) 2017-2021

Site	Source	2017	2018	2019	2020	2021
Transfer (D)	HWDI	144	122	0	130	262
Other	HWDI	31	87	45	51	38
Asbestos Collection Services	WDI	0	0	0	4	10
E O L I T Services	WDI	0	0	0	0	0
Nirro Limited	WDI	3	5	0	1	0
Safetykleen Uk	WDI	10	5	5	7	8
Windsor Waste Management Limited	WDI	40	48	46	8	29

Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2017-2021

Tower Hamlets' waste exports to Greenwich (tonnes) 2017-2021

Site name	Site type	Waste	2017	2018	2019	2020	2021
Tunnel Wharf	Treatment	CDE	0	5,795	9,383	21,842	36,968
Maybank Wharf	Treatment	HIC CDE	0	3,212	8,773	7,812	5,493
Victoria Deep Water Terminal	Treatment	HIC CDE	15,725	0	0	0	0
Other	All	All	1,786	14,594	234	44	0
All			17,511	23,601	18,390	29,698	42,461

Source: Waste Data Interrogator 2017-2021

Hazardous waste exports to Hammersmith and Fulham (tonnes) 2017-2021

Site	Source	2017	2018	2019	2020	2021
Recovery	HWDI	5	135	137	142	140
Other	HWDI	34	8	0	2	3
-	WDI	-	-	-	-	-

Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2017-2021

Tower Hamlets' waste exports to Havering (East London) (tonnes) 2017-2021

Site name	Site type	Waste	2017	2018	2019	2020	2021
Silt Lagoons, Rainham and Wennington Marshes	Landfill	CDE	0	0	0	0	45,679
Frog Island	Treatment	CDE	11,267	13,579	24,319	10,566	28,167
Rainham Landfill	Landfill	HIC CDE	35,119	26,924	15,432	705	619
Kilnbridge Construction Services	Transfer	CDE	11,112	7,358	3,864	1,618	1,482
Other	All	All	727	206	0	0	6
All			58,225	48,067	43,614	12,889	75,953

Source: Waste Data Interrogator 2017-2021

Hazardous waste exports to Havering (tonnes) 2017-2021

Site	Source	2017	2018	2019	2020	2021
Transfer (D)	HWDI	20	4	0	11	6
Transfer (R)	HWDI	4	6	0	90	12
Treatment	HWDI	152	112	62	77	3
Other	HWDI	0	0	0	0	0
-	WDI	-	-	-	-	-

Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2017-2021

Hazardous waste exports to Kent (tonnes) 2017-2021

Site	Source	2017	2018	2019	2020	2021
Incineration without energy recovery	HWDI	100	67	0	70	99
Landfill	HWDI	195	68	462	72	56
Recovery	HWDI	234	202	198	578	422
Transfer (D)	HWDI	74	39	0	73	57
Transfer (R)	HWDI	15	24	0	17	10
Treatment	HWDI	305	145	58	63	33
Sweeep Kuusakoski Ltd	WDI	69	100	98	96	74
Unit D2 Springhead Enterprise Park	WDI	10	7	8	3	0
Ace Car Breakers	WDI	0	0	1	0	2

Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2017-2021

Tower Hamlets' waste exports to Newham (East London) 2017-2021

Site name	Site type	Waste	2017	2018	2019	2020	2021
Marshgate Sidings	Transfer	CDE	0	49	52,012	24,041	16,789
Bywaters Recycling And Recovery Centre (WDI)	Recycling/ Transfer	HIC	0	0	9,745	12,489	14,028
Bywaters Recycling And Recovery Centre (ENV18)			25,306	23,123	21,238	20,094	20,970
JRL Environmental	Treatment	CDE	0	0	0	8,089	11,502
G B N Services Ltd, Canning Town Depot	Treatment	HIC CDE	0	0	0	3,656	7,635
Other	All	All	9,139	11,350	8,732	5,711	3,642
All			9,139	11,399	70,489	53,986	53,596

Source: Waste Data Interrogator 2017-2021 and ENV18 - Local authority collected waste: annual results tables 2017-2021

Hazardous waste exports to Newham (tonnes) 2017-2021

Site	Source	2017	2018	2019	2020	2021
Recovery	HWDI	2,904	3,862	10,010	699	2,773
Other	HWDI	69	53	0	35	25
I O D Skip Hire Ltd	WDI	0	0	0	4	0
Waste Transfer Station, Silvertown	WDI	73	49	31	33	25
Towcester Road	WDI	0	0	0	0	2

Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2017-2021

Hazardous waste exports to Northamptonshire (tonnes) 2017-2021

Site	Source	2017	2018	2019	2020	2021
Landfill	HWDI	3	0	0	0	141
Transfer (D)	HWDI	666	13	0	548	1,464
Transfer (R)	HWDI	2,968	26	0	779	213
Other	HWDI	6	4	1	2	8
Pro - Active Asbestos Control Ltd	WDI	0	0	0	0	0

Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2017-2021

Hazardous waste exports to Sandwell (tonnes) 2017-2021

Site	Source	2017	2018	2019	2020	2021
Treatment	HWDI	0	978	2,485	1,552	11
Other	HWDI	10	14	0	18	117
ERQ - STC	WDI	0	16	2,484	1,538	30
Bullock Street	WDI	0	0	0	0	15

Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2017-2021

Hazardous waste exports to Surrey (tonnes) 2017-2021

Site	Source	2017	2018	2019	2020	2021
Landfill	HWDI	596	198	427	41	82
Treatment	HWDI	494	18	0	312	0
Other	HWDI	0	56	0	0	2
Mercury Recovery Redhill Surrey	WDI	0	0	0	0	1

Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2017-2021

Tower Hamlets' waste exports to Thurrock 2017-2021 (tonnes)

Site name	Site type	Waste	2017	2018	2019	2020	2021
Bluelands Quarry	On/In Land	CDE	87,241	23,793	102,269	3,773	0
East Tilbury Quarry	Landfill	CDE	11,739	26,986	70,900	49,591	56,277
East Tilbury Quarry	Transfer	CDE	9,450	50,320	0	12,625	7,397
U R M (U K) Limited	Treatment	CDE	0	13,091	17,703	9,993	16,831
Other	All	All	3,707	1,886	1,213	353	231
All			112,137	116,076	192,085	76,335	80,736

Source: Waste Data Interrogator 2017-2021

Hazardous waste exports to Thurrock (tonnes) 2017-2021

Site	Source	2017	2018	2019	2020	2021
Treatment	HWDI	0	0	11,566	7,451	7,885
Other	HWDI	59	55	0	20	21
Fairlight Vehicles Ltd	WDI	0	0	0	0	4
Juliette Way Materials Recycling & WEEE ATF	WDI	0	0	0	0	1

Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2017-2021