

BPP Consulting for Richmond Council

Arlington Works Appeal

Impact of Loss of Appeal site capacity on achievement of net self sufficiency for management of waste received.

Context

The London Plan identifies safeguarding of capacity dealing with hazardous waste as a priority matter, giving policy protection to such sites by way of Policy 5.19 clause B (mirrored in Policy SI 9 clause D in the Publication draft). Moreover given the policy objective of achieving net self sufficiency by 2026¹, the adopted London Plan states at Para 5.89 (mirrored in para 9.8.18 of the Publication draft) that: *"..there remains the risk of a major shortfall in our capacity to treat and dispose of hazardous waste safely... There is therefore a need to continue to identify hazardous waste capacity for London. "*

Hence a shortfall of capacity to deal with hazardous waste in London exists even with the safeguarding of current sites, making protection of existing capacity all the more crucial if the objective of net self sufficiency is to be met.

Objective

The objective of this exercise is to establish whether the loss of capacity will adversely impact on achievement of this goal.

Method

Comparison of data for 2017 and 2019 from the Agency Hazardous Waste Interrogator (HWI) for arising of the following waste types, being the principal types managed at the appeal site. Principal has been taken to be 100 tonnes or more received from a single district.

Table 1: Principal hazardous waste types managed at appeal site in 2017

Source: EA HWI 2017

EWC Code	Description
120106	mineral-based machining oils containing halogens
120109	machining emulsions & solutions free of halogens
120110	synthetic machining oils
130205	mineral-based non-chlorinated engine, gear & lubricating oils
130208	other engine, gear & lubricating oils
130507	oily water from oil/water separators
130703	other fuels (including mixtures)
130802	other emulsions
160708	wastes containing oil
161001	aqueous liquid wastes containing dangerous substances
190207	oil & concentrates from separation

The assessment is aided by the fact that the site ceased receiving waste in 2018, and hence data for 2019 on movement of the target hazardous waste reveals how the market responded in the absence of the site.

¹ It should be noted that para 9.8.1 of the publication draft makes clear that "The term net self sufficiency is meant to apply to all waste streams".

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Findings

Comparison of data reveals the following in relation to the waste types formerly managed at the appeal site. (referred to as 'target hazardous waste').

48,148 tonnes of target hazardous waste was produced in London in 2017. Of this only 9,471 tonnes was managed within London. In addition to London's arising of this waste, a further 19,795 tonnes was received for management from outside London. This gives net self sufficiency for the target hazardous waste of 61% - 48,148 tonnes arising vs 29,266 tonnes managed in London.

42,580 tonnes of target hazardous waste was produced in London in 2019. Of this only 8,064 tonnes was managed within London. In addition to London's arising of this target waste, a further 13,490 tonnes was received for management from outside London. This gives net self sufficiency for the target streams of 51% - 42,580 tonnes arising vs 21,554 tonnes managed in London.

The data is set out in Table 2 below:

Table 2: Quantities of target hazardous waste types produced & managed within London

Source: EA HWI 2017 & 2019

	2017	2019
Produced in London (tonnes)	48,148	42,580
Managed in London (tonnes)	29,266	21,554
Net Self Sufficiency Achieved	61%	51%
Difference	61-51= 10% loss	

Conclusion

Since the closure of the appeal site to waste inputs, the level of net self sufficiency achieved for the waste types managed has fallen by ten percentage points, to only just above 50%. This indicates that the loss of capacity has a significant adverse impact on achievement of net self sufficiency for the target hazardous waste within London as a whole, of which the Plan area forms part.