

Mayor's Municipal and Business Waste Management Strategies: Integrated Impact Assessment Post Adoption Statement

This document comprises the Post Adoption Statement (PAS) required by Regulations 16 (1) and (2) of the Environmental Assessment of Plans and Programmes Regulations 2004, otherwise known as the "SEA Regulations". Regulation 16 sets out the requirements for the 'Post Adoption Procedures' to be undertaken following the adoption of the revised Mayor's Municipal Waste Management Strategy (MWMS). They include the publication of the revised MWMS and its accompanying Integrated Impact Assessment (IIA) Report, including the Environmental Report and this PAS.

The Mayor has also produced a strategy for London's business waste (BWS) in parallel to his MWMS. The BWS is a non-statutory strategy and provides a framework for how the Mayor will work with business to manage its waste more effectively and efficiently. The SEA Regulations do not apply to the BWS, however for good practice and due to municipal and business waste having similar environmental impacts, a joint municipal and business waste strategy Integrated Impact Assessment report was undertaken. For consistency in completing the IIA process, a joint municipal and business waste strategy post adoption statement has been produced.

INTRODUCTION

The Mayor's Municipal and Business Waste Management Strategies (MWMS and BWS)

In accordance with his statutory duty under the Greater London Authority (GLA) Act 1999, the Mayor of London has prepared a revised Municipal Waste Management Strategy for Greater London called "**the Mayor's Municipal Waste Management Strategy**" (MWMS) that sets out his policies and proposals for municipal waste management in Greater London in the period to 2031. The MWMS was approved and formally adopted by the Mayor on 18 November 2011.

The MWMS sets out the Mayor's vision for London's municipal waste management to 2031 and describes how the GLA and its partners, including the Government and London waste authorities, will deliver that vision. The MWMS describes how the Mayor will develop and implement policies and proposals that reduce the amount of municipal waste produced, increase waste reuse and recycling levels, and generate low carbon energy from waste remaining. Implementing these policies and proposals will put London on the path to becoming a zero waste to landfill city and it ensure it plays an important part in helping the UK meet its landfill diversion requirements set by the 1999 European Landfill Directive.

The BWS is the first Mayoral strategy for London's business waste. It sets out initiatives to help all kinds of London's businesses, from shops, restaurants, office buildings, manufacturers to construction companies to save money and reduce harm to the environment through better waste management.

The MWMS and BWS are consistent with other Mayoral strategies, including the London Plan 2011, the Mayor's Transport Strategy (MTS), the Mayor's Air Quality Strategy, and the Mayor's Climate Change Mitigation and Energy Strategy.

The MWMS and BWS are available at: www.london.gov.uk

The Integrated Impact Assessment (IIA) of the MWMS and BWS

The preparation of the revisions to the MWMS and BWS has been subject to procedural and legal requirements¹, including the SEA Regulations, necessitating assessment of how the MWMS and BWS will affect people, places and environmental conditions in Greater London. To fulfil these requirements, the GLA undertook the IIA. The IIA Report on the MWMS conformed with the requirements of an Environmental Report under the SEA Regulations. The IIA Report comprises an integrated assessment of the likely significant effects of the revised MWMS and the BWS, incorporating the following assessments:

- Strategic Environmental Assessment (SEA);
- Health Impact Assessment (HIA);
- Equality Impact Assessment (EIA); and
- Economic Impact Assessment.

The IIA Report also includes an assessment of the likely significant effects of the MWMS and BWS on community safety (as required under s17 of the Crime and Disorder Act 1998, as amended).

In undertaking the IIA, the intention was to ensure that commonalities, inter-related issues and synergies between the above assessments and their outputs were identified in a systematic manner and used to inform the revised MWMS and BWS development process.

The IIA process and methodology are described in the IIA Report which accompanied the publication of the draft MWMS and BWS for public and stakeholder consultation. The report was made available for consultation between October 2010 and January 2011. The IIA Report is available at <http://www.london.gov.uk/consultation/waste-strategy>

The purpose of the Post Adoption Statement (PAS)

The preparation of a PAS is a requirement of the SEA Regulations. Regulation 16(1) and (2) requires that a statement is prepared and published following the adoption of the MWMS and the publication of the IIA Report, containing the following particulars set out in Regulation 16 (4):

- How environmental considerations have been integrated into the MWMS;
- How the environmental report has been taken into account;
- How opinions expressed by consultees in response to the invitation referred to in Regulation 13(2)(d) have been taken into account;
- Action taken by the responsible authority in accordance with Regulation 13(4) has been taken into account and how the results of any consultations entered under Regulation 14(4) have been taken into account;
- The measures that are to be taken to monitor the significant environmental impacts of the implementation of the MWMS.

¹ There are no legal requirements for producing the Mayor's BWS

The particulars set out in the bullet points above have also been applied to developing the BWS following the publication of the IIA report. Consistent with the approach of the IIA, this PAS addresses not only environmental matters in accordance with the SEA Regulations, but all aspects of sustainability (including environmental, social and economic matters) covered by the IIA.

The PAS is structured in accordance with the requirements of the SEA Regulations.

HOW ENVIRONMENTAL AND WIDER SUSTAINABILITY CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE REVISED MWMS AND BWS; HOW THE IIA REPORT HAS BEEN TAKEN INTO ACCOUNT

In accordance with the requirements of Regulation 16.4(a) and (b), this section sets out how environmental considerations and wider considerations of sustainability have been integrated into the development of the MWMS and also for the BWS. This section also sets out how the principal output of the IIA, the IIA Report (incorporating the SEA Environmental Report) has been taken into account in determining the content of the MWMS and BWS.

The IIA process

The IIA process began in early 2009 with the development of a Scoping Report which set out the scope and nature of the process and its role in the development of the revisions of the MWMS and development of the BWS. The Scoping Report contained a draft assessment framework for evaluating the impacts of the draft revisions and their potential to achieve the following objectives:

- To maximise the mental and physical health and well-being of the population and reduce inequalities in health.
- To enhance community safety by reducing crime and the fear of crime, anti-social behaviour and misuse of drugs, alcohol and other substances.
- To ensure equitable outcomes for all communities, particularly those most at risk to experience discrimination, poverty and social exclusion, and celebrate the unique ethnic and cultural diversity of London's citizens.
- To create and sustain liveable environments that promote social cohesion, sustainable lifestyles and a sense of place.
- To enhance and protect the built, historic and cultural environment.
- To ensure that Londoners are respected as citizens, that their voices are heard, and that they are supported, engaged with and allowed to actively participate in changing their lives to be sustainable and low carbon.
- To maximise accessibility for all in London to housing, key services and amenities and increase the proportion of journeys made by public transport, by bicycle and by foot.
- To encourage a strong, diverse, low carbon and prosperous economy, with resilient businesses and organisations, so that all Londoner's can enjoy a good quality of life, with rewarding and satisfying employment and the opportunity to develop and improve their skills.
- To conserve and enhance local and global natural habitats and wildlife and bring nature closer to people.

- To conserve and enhance the supply and quality of water resources and prevent flooding.
- To improve local, national and international air quality.
- To address the causes of climate change through minimising the emissions of greenhouse gases by reducing consumption of energy at source, achieving greater energy efficiency, supplying renewable and efficient energy and reducing reliance on fossil fuels.
- To ensure that London is prepared for the impacts of climate change and is taking steps to reduce flood risk.
- To use resources efficiently, minimise the production of waste across all sectors, and maximise useful recovery of materials and energy.
- To provide educational opportunities so that new generations can understand environmental, social and economic issues and take their learning into decision making as adults.

The Scoping Report was published in June 2009 and disseminated to the three SEA statutory consultees (English Heritage, the Environment Agency and Natural England) for consultation. No changes to the objectives were made as a result of that consultation process. A copy of the Scoping Report is available at: http://www.london.gov.uk/sites/default/files/IIA_Scoping_report.pdf

The assessment of the possible strategic waste management policy options to be considered in developing the MWMS and BWS was an iterative process carried out in cooperation with independent consultants Levett Therivel from summer 2009.

How environmental and wider sustainability considerations have been integrated into the MWMS and BWS

From the outset of the IIA process there was a clear focus on environmental and wider sustainability considerations in the drafting of the MWMS and BWS. The IIA framework was used to test the environmental and wider sustainability of emerging policies and proposals. To facilitate this exercise, there was close and ongoing communications between the GLA MWMS and BWS drafting teams and the IIA consultancy team on sustainability matters. This was facilitated by means of:

- Meetings between policy teams and the IIA consultancy team.
- Provision of written feedback by the IIA team on iterations of the draft revised MWMS and BWS², including the draft published for consultation with the London Assembly and functional bodies.
- Ongoing review of iterations of proposed sections of the draft revised MWMS and BWS.

Through preliminary assessment, constructive challenge and ongoing review of the iterations of the emerging policies and proposals of the draft revised MWMS and BWS, environmental and wider sustainability policy considerations were identified and integrated into the draft revised MWMS and BWS as a result of the IIA process.

² A draft BWS was not prepared for consultation with the London Assembly.

How the IIA report has been taken into account

The IIA process described above provided the means by which the drafting of the MWMS and BWS was positively influenced and shaped by considerations of environmental and wider sustainability. Overall, the IIA report predicted that implementation of the Public Draft MWMS and BWS will:

- Be highly beneficial for encouraging efficient use resources, minimising the production of waste, and maximising useful recovery of materials and energy.
- Be highly beneficial for climate change mitigation and energy, by virtue of the emphasis it gives to maximising energy recovery from waste.
- Contribute to climate change adaptation, both by developing waste as an alternative to fossil fuel energy and by reducing transport of waste and its impacts.
- Be good for the economy, by seeking to develop jobs and business opportunities within the waste sector and by reducing waste and therefore the costs of dealing with it.

The IIA Report concluded that the MWMS and BWS would have a positive impact on all the objectives of the framework included in the Scoping Report, and would have few, small, but generally positive effects on other IIA objectives. No changes were considered necessary to this overall statement as a result of changes made to the MWMS and BWS following consultation on the draft revised MWMS and BWS.

The IIA Report also made recommendation that were taken into account in developing the MWMS and BWS for final adoption. The recommendations are summarised below along with how they have been incorporated into the MWMS and BWS:

Municipal Waste Management Strategy

	<i>IIA recommendation</i>	<i>MWMS response</i>
1	Give the greatest possible support to reducing and avoiding waste	As the boroughs and not the Mayor deliver local waste services, the Mayor's policies for waste prevention will mostly be delivered through the Recycle for London behaviour change programme funded by the London Waste and Recycling Board (£5m 2009-2013). The Mayor has also set out policies in his Business Waste Strategy to work with manufacturers to reduce waste at source, in particular to reduce packaging.
2	Advance MWS objectives by prioritising projects as far up the waste hierarchy as possible, such as anaerobic digestion.	The MWMS uses an outcome based approach focusing on waste activities achieving the greatest environmental benefits as opposed to specifying particular technologies. This approach supports prioritising projects up the waste hierarchy.
3	Further support home composting, for instance through an explicit policy and by supporting Master Composter scheme.	Support for home composting made more explicit in Policy 1 of the MWMS. Home composting initiatives are supported through the local authority support service as part of the Recycle for London programme
4	Clarify how the CO ₂ equivalent emissions performance standard (EPS) would be applied to waste management decisions, and ensure the carbon intensity floor for energy generated from London's municipal waste is not set too low.	Clarity provided that the EPS is an advisory carbon metric for London's waste management to work towards. The carbon intensity floor set within the EPS is a mandatory standard for waste authorities to achieve in undertaking their waste management functions. The EPS will be reviewed at least every three years to ensure the EPS level developed can achieve the greatest CO ₂ equivalent emission savings as practicable from London's municipal waste management activities.

Business Waste Management Strategy

	<i>IIA recommendation</i>	<i>BWS response</i>
1	Provide more emphasis on the behavioural, perceptual, institutional factors hampering uptake, e.g. the scarcity of management time.	A section summarising various research studies on factors hampering uptake has been included.
2	Are there any further practical actions the Mayor could take: it is recognised	As recognised by the IIA, the lack of statutory powers makes 'hard'

	that lack of statutory powers means the policy must rely largely on persuasion and encouragement, but hard measures where possible will increase its effectiveness.	measures difficult. However, a series of measures have been detailed in the BWS which should give businesses strong incentives to manage waste better – this includes making businesses aware of the commercial opportunities from better waste management, and strong Mayoral recognition for doing so.
3	Consider targeting minority owned businesses through their networks and targeting particular sectors known to have a high proportion of minority owned businesses.	The BWS has a special focus on providing support to SMEs through programmes like the Mayor's Green Procurement Code, which organises sector-specific support events. The majority of minority owned businesses are SMEs.
4	Consider being ready for possible changes in the composition of waste resulting for changes in London's economy (for example a possible resurgence in manufacturing).	Mayoral projects use the best available data and projections on material streams coming from London's businesses and will continue to do so.

OPINIONS EXPRESSED IN RESPONSE TO PUBLIC CONSULTATION AND HOW THESE HAVE BEEN TAKEN INTO ACCOUNT

In accordance with Regulation 16.4 (c) this section summarises the opinions received through consultation on the IIA and draft revised MWMS and BWS and explains how these opinions were taken into account in determining the content of the MWMS and BWS.

The SEA Regulations required that the 'consultation bodies' for SEA (the Environment Agency, Natural England and English Heritage) were consulted along with public and other stakeholder consultees on the draft revised MWMS and the IIA Report, incorporating the Environmental Report. None of these organisations nor the public and or other stakeholders (including London boroughs) included specific reference to the IIA Report in their responses to either the MWMS or BWS.

During the MWMS and BWS public consultation phase, the GLA hosted a workshop with people from organisations (including the Metropolitan Police, and the Church of England) representing the IIA assessment areas including community safety, health and inequalities, social inclusion, and governance. There was agreement amongst the workshop attendees that the MWMS and BWS supported the achievement of the IIA objectives, and that the successful implementation of the MWMS and BWS would:

- Reduce litter related crime
- Help create a cleaner and greener London, making it safer and more enjoyable place to live in and work.
- Improve accessibility to a full range of waste and recycling collection services across London, regardless of the housing type or housing demographic people lived in.

- Reduce the cost of local waste management services on Londoners by diverting more waste from landfill towards reuse, recycling and energy generation processes.
- Help generate local jobs in the reuse, recycling and other waste management sectors from managing more of London's municipal waste within the capital

The GLA produced a report on the public and stakeholder consultation on the draft revised MWMS which was published on its website alongside the MWMS (www.london.gov.uk).

REASONS FOR CHOOSING THE MWMS AS ADOPTED IN THE LIGHT OF OTHER REASONABLE ALTERNATIVES DEALT WITH

In accordance with Regulation 16.4 (e), this section summarises the alternatives considered in developing the MWMS and the reasons for choosing the MWMS in its adopted form in light of these alternatives.

Table 5 of the IIA Report set out a range of alternative policies and proposals that were considered during the development of the MWS. The main alternatives considered in developing the MWMS; their significant impacts; and the reasons given by plan authors for choosing the preferred alternative are set out in more detail in Annex 1 of the IIA report, and are set out in the table below.

Preferred alternative (policy/proposal)	Alternative considered	Significant impacts of the alternative	Reason for choosing the preferred alternative
Aim towards waste management self-sufficiency for London	Status quo – continue allowing more of London's waste to be managed outside London	Transport of wastes to other locations with associated CO ₂ and air pollution emissions; impacts of waste management facilities are felt outside rather than inside London; jobs and economic benefits of waste management are not retained in London	Managing more of London's waste within London implements self-sufficiency requirements under PPS10 and allows London to recover value from its waste for London
Municipal recycling targets set at 45% by 2015 and 50% by 2020, aspiring to achieve 60% by 2031	Set targets in terms of reducing waste going to landfill	Recycling is a means, not an end in itself. This alternative would explicitly help to achieve the requirements of the Landfill Directive	The Mayor has limited influence on reducing the amount of waste produced, and to set realistic and measurable reduction targets
Include waste reduction target	Set overall waste reduction targets	This alternative would focus on the highest level of the waste hierarchy.	

Preferred alternative (policy/proposal)	Alternative considered	Significant impacts of the alternative	Reason for choosing the preferred alternative
	Set higher or lower recycling targets		West London Waste Authority and the South London Partnership, making up a third of London boroughs, have set 50% MSW recycling targets by 2020. WRAP estimate at least 60% of MSW is recyclable ³ .
Split the “energy recovery” step in the waste hierarchy to give preference to technologies that use both heat and electricity generated (CHP) ahead of technologies that use either heat or electricity generated	Maintain a generic energy recovery step in the waste hierarchy.	Technologies operating in CHP mode achieve greater energy efficiency levels and CO2 savings ⁴ , and CHP facilities can provide cheaper heat than through conventional methods.	
Promote waste activities and technologies based on their greenhouse gas performance, and set minimum greenhouse gas performance levels	Specify waste services and technologies for example anaerobic digestion and gasification	Simpler for developers and local authorities to implement; does not account for emerging technologies and variations in technology	The efficiency and environmental performance of waste technologies depend on how they are configured; allows greater flexibility ⁵ .
Provide funding to support regional campaigns such as Recycle for London to raise awareness	Support borough-specific awareness campaigns only	Could improve effectiveness by taking into account unique aspects of each borough, e.g. proportion of flats, existing recycling rates	Economy of scale and consistent message benefits with regional campaigns, supporting local initiatives.
	Support awareness campaigns focused on equality and other deprived groups	Equality and deprived groups overall have lower recycling rates, so a focused campaign could improve the campaign's effectiveness, as well as supporting equality/diversity	
Work with boroughs, Third Sector and businesses to promote and deliver waste reduction and reuse, and recycling programmes	Work only with boroughs and Third Sector, not businesses	Would support the voluntary and not-for-profit sector. These often employ people who might otherwise remain jobless, with associated social benefits. However it could disregard key players in waste management	Waste from businesses makes up a high proportion of London's waste
<i>Promote recycling collection services achieving the greatest possible climate change</i>	Prescribe minimum levels of waste and recycling collection services	Prescribing minimum levels of service could increase recycling performance and achieve consistency of	Allows greater flexibility for boroughs, recognising local circumstances e.g.

³ WRAP recycling study, 2007

⁴ Greenhouse gas balance of waste management scenarios, GLA, January 2008.

⁵ Greenhouse gas balance of waste management scenarios, GLA, January 2008.

Preferred alternative (policy/proposal)	Alternative considered	Significant impacts of the alternative	Reason for choosing the preferred alternative
<i>mitigation benefits and cost savings.</i>		services across London	difficulties with providing cost-effective recycling services in areas of high density housing.
Encourage boroughs to provide more “on the go” recycling services including ‘bring’ sites for separated recyclables	Prescribe source-separated recycling collection services	Could lead to delivery of higher quality materials. Could impact positively on equality groups and people living in social housing and thus encourage more recycling amongst those groups. Clearly compliant with the revised Waste Framework Directive	A mix of co-mingled and source separated collections maybe necessary given the different housing stock across London, each with various access implications.
Promote incentive schemes such as Recyclebank to reward people for recycling	Require boroughs to impose compulsory recycling schemes or alternate weekly refuse collections.	Fortnightly collection can be problematic, especially for poorer households and flat dwellers short of space to store different kinds of waste. It could also raise issues of enforcement and penalties for non-compliance. Fly tipping already costs London authorities approximately £13m each year ⁶ .	There are already inconsistent levels of service across London, making it difficult to enforce minimum levels of service. Compulsory measures may also increase fly-tipping. Introduction of powers to introduce compulsory recycling measures have also been ruled out by Government, whose preferred approach is use of incentives.
Local authorities should offer waste and recycling collection services to small enterprises, on par with households	No specific provision for small enterprises	Small enterprises have many of the characteristics of households (e.g. limited space and resources for waste management).	The Government is changing the definition of municipal waste to include more commercial waste. Boroughs will need to have services in place to manage more commercial waste
Undertake a Best Practice Review of revenue-sharing opportunities in waste management contracts	Maintain status quo of supporting different waste contracts across London boroughs	The status quo has led to varied and inconsistent levels of service and revenue sharing opportunities;	Standardised waste contracts with revenue sharing arrangements will help achieve consistent waste and recycling services across London, further incentives boroughs to improve recycling and landfill diversion rates,

⁶ http://www.croydonguardian.co.uk/news/1348737.flytipping_costs_london_13million_a_year/

Preferred alternative (policy/proposal)	Alternative considered	Significant impacts of the alternative	Reason for choosing the preferred alternative
			and provide the waste industry with consistent waste service specifications

The GLA considers that the reasons for not adopting these alternatives in the MWMS are still justified.

REASONS FOR CHOOSING THE BWS AS ADOPTED IN THE LIGHT OF OTHER REASONABLE ALTERNATIVES DEALT WITH

This section summarises the alternatives considered in developing the BWS and the reasons for choosing the BWS in its adopted form in light of these alternatives.

Table 6 of the IIA Report set out a range of alternative policies and proposals that were considered during the development of the BWS. The main alternatives considered in developing the BWS; their significant impacts; and the reasons given by plan authors for choosing the preferred alternative are set out in more detail in Annex 2 of the IIA report, and are set out in the table below.

Preferred alternative (policy/proposal)	Alternative considered	Significant impacts of the alternative	Reason for choosing the preferred alternative
95% re-use, recycling and composting target for CDE waste by 2020, maintaining performance to 2031	No targets or set higher or lower recycling targets	Realistically, unlikely to achieve greater than 95% re-use, recycling and composting; this is already considered best practice level anyway. Lower targets may encourage management of CDE waste at lower levels of the waste hierarchy.	Performance levels already demonstrated on major infrastructure projects in London (e.g. Heathrow T5 and Olympic Park development). WRAP best practice examples up to 95%.
70% re-use, recycling and composting target for C&I waste by 2020, maintaining performance to 2031	No targets or set higher or lower recycling targets	Lower targets may encourage management of C&I waste at lower levels of the waste hierarchy.	GLA Group members individually achieving performance levels of around 70% and upwards. Study for Westminster Council showed that 70% of waste from each of retail, hospitality and office sectors is potentially recyclable. ⁷

⁷ WAP (2005) Waste Analysis Project: Final Report [Online] available at http://www3.westminster.gov.uk/docstores/publications_store/WCCWasteAnalysisFinalReport.pdf (accessed 18 June 2010).

The GLA considers that the reasons for not adopting these alternatives in the BWS are still justified.

THE MEASURES THAT ARE TO BE TAKEN TO MONITOR THE SIGNIFICANT ENVIRONMENTAL AND WIDER SUSTAINABILITY EFFECTS OF THE IMPLEMENTATION OF THE MWMS and BWS

In accordance with Regulation 16.4 (f) and Regulation 17, this section summarises the monitoring measures that will be undertaken by the GLA to monitor the significant environmental and wider sustainability effects of the implementation of the MWMS. This section also summarises the monitoring measures that will be undertaken by the GLA to monitor the significant environmental and wider sustainability effects of the implementation of the BWS.

The primary responsibility for undertaking monitoring of the delivery of the MWMS resides with the Mayor. The MWMS monitoring process is set out in the Implementation Plan of the revised MWMS. Data from wastedataflow, the government's tool for UK waste authorities to report their municipal waste management performance, will be analysed and reported annually to review progress towards meeting the recycling targets and greenhouse gas emissions performance standard set out in the MWMS. In addition, the GLA will provide London municipal waste management performance data to the publicly accessible London datastore, which will allow anyone to analyse London's municipal waste management performance and suggest how improvements to performance can be made. For those policies where the impact is not readily quantified, for example waste reduction, professional judgement of the impact of the policies will be provided alongside indicators of the implementation of these policies.

The BWS monitoring process is set out in the Implementation Plan of the BWS.

The GLA will take into account the recommendations of the IIA Report when reporting on progress implementing the MWMS and BWS.