

Drowning in Rubbish

A London Assembly response to the Mayor's consultation on draft alterations to the London Plan policies on waste and minerals November 2005



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Chair's Foreword



Waste is a product of every day life, we all produce it. In London we generate around 17 million tonnes of waste a year and four million of that mostly comes from our households.

London already struggles to manage the waste it creates, which is set to rise significantly in the future. Our current methods for managing household waste are not good enough. We mostly rely on landfill sites outside of London and incinerators. We need to do better at recycling. London has the second worst regional recycling rate for household waste in the country. At 17 per cent we are a third below the 25 per cent national target set for 2005.

We cannot continue in this way! We desperately need to cut back on the waste we produce, recycle more, and look to other innovative ways to convert our waste into the valuable resource that it is. Not only will we see the environmental benefits, but also financial ones. The European Union is set to levy colossal fines on London in 2010 if it fails to meet the objectives it set for waste disposal back in 1999.

The Mayor's draft alterations to the London Plan policies on waste and minerals are to be welcomed. They provide a much-needed steer on how to plan for and manage our waste. However fundamental questions remain to be answered about the practical measures that will need to be taken to get us to the Mayor's vision for future waste planning and management in London.

Darren Johnson AM

Chair, Environment Committee

Javes Johns

The London Assembly Environment Committee

Terms of Reference

The Environment Committee is a cross-party committee of London Assembly Members, with the following terms of reference.

To examine and report from time to time on -

- the strategies, policies and actions of the Mayor and the Functional Bodies
- matters of importance to Greater London

To examine and report to the Assembly from time to time on the Mayor's Air Quality, Biodiversity, Energy, Noise and Waste Strategies, in particular their implementation and revision.

To consider environmental matters on request from another standing committee and report its opinion to that standing committee.

To take into account in its deliberations the cross cutting themes of: the health of persons in Greater London; and the promotion of opportunity.

To respond on behalf of the Assembly to consultations and similar processes when within its terms of reference.

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Executive Summary

London currently produces an estimated 17 million tonnes of waste every year, but only has the capacity to manage just 10 million tonnes or 60 per cent of the waste produced. Experts estimate that the amount of waste we produce will rise to 25.8 million tonnes by 2020.

The Mayor has published draft alterations to policies on planning for waste and minerals set out in his Spatial Development Strategy more commonly known as the 'London Plan'. The London Plan, focuses on how London can plan for and manage its municipal solid waste, waste mostly made up of what we as Londoners produce in our households each day.

The challenge London faces to manage its municipal solid waste is enormous. We produce four million tonnes a year, and recycle just 17 per cent, a third below the 25 per cent national target set for 2005. Recycling rates will need to be improved if we are to reduce the amount of waste we produce and avoid the huge landfill fines that I ondon is set to fall victim to.

When the Mayor published the London Plan in February 2004, one of the main concerns raised by stakeholders then, was that the proposals and strategies for waste management were not supported by detailed evidence on the capacity to develop waste management facilities in London. The publication of the draft alterations to London Plan policies on waste and minerals and supporting technical report *Recycling and recovery facilities sites investigation in London* address this concern and are to be welcomed.

The London Assembly's Environment Committee commends the efforts of the draft alterations to provide a much-needed steer on how capacity for sustainable waste management might be addressed. However the Committee remains concerned that fundamental aspects of waste planning and management, such as the mismatch between the proposed sub-regional boundaries for planning and the existing ones, and the likely shortfall in the skills and knowledge required to take the waste planning agenda forward could undermine the proposals.

In September 2005, the Mayor published a proposal paper on how London's waste might be managed in the future. The paper suggests that managing the disposal of London's waste through a single body with a London-wide remit will be more effective than the current fragmented arrangements.

The Committee is concerned to see a joined-up approach to planning for waste and minerals that will take us into an era of reduced waste, and one in which the potential value of waste is fully realised. The draft alterations must provide the starting point for such future planning.

Chapter 1 Introduction

- 1.1 On 25 July 2005 the Mayor published draft alterations to the London Plan policies on waste and minerals and housing provision targets for consultation with the London Assembly and Greater London Authority (GLA) Group¹. A revised version of the draft alterations was published on 20 October and is currently subject to public consultation². This report sets out the Environment Committee's response to the draft alterations on waste and minerals.
- 1.2 To assist us in coming to our views and recommendations we:
 - Questioned officers from the GLA's planning, waste and environment teams³.
 - Commissioned technical expertise from consultants Brook Lyndhurst.
 - Consulted with key external stakeholders⁴.
 - Drew on findings published earlier this year by the Commission on London Governance⁵.
- 1.3 Our response focuses on issues relating to the draft alterations on waste planning. The alterations to the minerals targets were put together by the London Aggregates Working Party, which includes representatives from the London boroughs, the minerals industry, regional government and the neighbouring regions. The alterations appear to reflect the views held by the range of stakeholders we consulted.
- 1.4 It should be pointed out that this phase of consultation is one of a number of steps leading up to the adoption of the proposed revisions. The full process with the timeline for completion is noted in Chapter 2.
- 1.5 The remaining sections of this report outline European, national and regional planning and waste management policy (Chapter 2), our concerns and comments on how the proposed alterations are to be delivered, including

http://www.london.gov.uk/assembly/envmtgs/index.jsp or on request from the London Assembly Secretariat

¹ The GLA Group is made up of the Greater London Authority, Transport for London, the Metropolitan Police Authority, the London Development Agency and the London Fire Brigade. More information is available at http://www.london.gov.uk/london_group.isp

² Copies of the draft alterations are available at http://www.london.gov.uk/mayor/planning/strategy.jsp

³ Public sessions were held on 26 July 2005 and 11 October 2005. Minutes and transcripts of Environment Committee meetings are available at

⁴ The consultation exercise was conducted as part of the work undertaken by Brook Lyndhurst consultants. See Appendix 1 for a list of the participants.

⁵ Making London work better, Submission to the Office of the Deputy Prime Minister on the review of powers and responsibilities of the Mayor and the Greater London Assembly, London Assembly/Association of London Government, October 2005. Copies are available at http://www.london.gov.uk/assembly/index.jsp or on request from the London Assembly Secretariat.

reference to the Mayor's recently published proposals for managing the disposal of London's waste in the future, (Chapter 3), what we consider to be the main risks to delivery of the proposed alterations (Chapter 4) and finally a summary of the main points and recommendations that came out of the inquiry (Chapter 5).

1.6 We appreciate the participation of the GLA officers and external stakeholders, and the technical support ably provided by Brook Lyndhurst consultants; we would like to thank them all for their assistance in this inquiry.

Chapter 2 Planning and waste management policy

European policy

- 2.1 The objectives of the European Community (EC) Framework Directive on Waste⁶ and the EC Landfill Directive⁷ are incorporated in the Waste Strategy 2000⁸ which sets out Central Government policy on waste management. Fundamental to the Strategy is the need to curb growth in the amounts of waste we produce. Where waste is created it must be recognised as a resource and value should be recovered from it.
- 2.2 The land-use planning system has an important role to play in achieving sustainable waste management and the Government has provided a national planning framework for waste management to support policies set out in the Waste Strategy.

The national planning framework

- 2.3 The Government's Planning Policy Guidance 10 (PPG10), published in 1999, provides advice on how the land-use planning system can contribute to sustainable waste management through the provision of the required waste management facilities in England. It explains how this provision is regulated under the statutory planning and waste management systems.
- 2.4 In 2002, the Government's Cabinet Office Strategy Unit published a report, which looked at how we manage waste in the UK⁹. One of its main findings was that the planning process needed to be more responsive to ensure improved delivery of waste management facilities on the ground. The report recommended that PPG10 be revised to make the planning process faster and more consistent.
- 2.5 In July 2005, the Government published Planning Policy Statement 10 (PPS10)¹⁰. PPS10 replaces PPG10 and is part of a package of measures announced by Government intended to help councils deliver the waste management facilities needed to manage the country's waste more effectively.
- 2.6 The main changes made by PPS10 to PPG10, were to remove the Best Practice Environmental Option (BPEO)¹¹ and the proximity principle¹², from waste

⁶ Available at http://europa.eu.int/comm/environment/waste/strategy.htm

⁷ Council Directive 1999/31/EC, EU of 26 April 1999 on the landfill of waste. More details available at http://europa.eu.int/ and http://europa.eu.int/ and http://www.defra.gov.uk/

⁸ Available at http://www.defra.gov.uk/environment/waste/strategy/cm4693/

⁹ Waste Not, Want Not, Cabinet Office Strategy Unit, Nov 2002. Available at http://www.strategy.gov.uk/

¹⁰Planning Policy Statement 10: Planning for Sustainable Waste Management, Office of the Deputy Prime Minister, July 2005

¹¹ The BPEO procedure establishes, for a given set of objectives, the option that provides the most benefits or the least damage to the environment as a whole, at acceptable cost, in the long term as well as in the short term. *The London Plan, glossary, page A60*

¹² The proximity principle states that resources and wastes should be collected, re-used or disposed of as close as possible to their source. *The London Plan, paragraph 4.1, page 155*

decision-making; these were fundamental tenets of the PPG10. Planning strategies will be subject to sustainability appraisals, which will deliver the process previously subsumed in BPEO. Other main features of PPS10 are listed in Appendix 3.

Waste management in London

- 2.7 The London Plan was published in February 2004; it sets out three policies for waste management in London, and another two for minerals¹³. All five policies are subject to alteration.¹⁴
- 2.8 The London Plan was published in draft in 2002 and was subject to extensive consultation, including an Examination in Public (EiP), leading up to publication of the final version in 2004. Details on the process, findings and recommendations of the EiP are available at the Greater London Authority website www.london.gov.uk.
- 2.9 The London Plan notes the Mayor 's intention to publish alterations to provide estimates of the adequacy of existing strategically important waste management and disposal facilities to meet London's future needs. It was also intended that the alterations identify both the number of facilities required and the broad location of such facilities.
- 2.10 The draft alterations will be subject to the same process as was used for the draft London Plan. The timetable leading up to adoption of the draft alterations, is as follows:

25 July – 9 September 2005	Pre-consultation with the Assembly and GLA Group
20 October 2005 – 20 January 2006	Public consultation on the proposed alterations
Week commencing 6 March 2006	Preliminary EiP meeting
12 June – 3 July 2006	EiP
October 2006	Receipt of the EiP Panel's report by the Mayor
November 2006	Publication of the EiP Panel's report
November 2006	Intended draft alterations notified to Government Office for London

2.11 The policies in the London Plan are to be read in conjunction with the Mayor's Municipal Waste Management Strategy (the Mayor's Waste Strategy) which sets

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¹³ See Appendix 3.

¹⁴ Copies of the alterations are available at

- out the overarching framework for waste policy in London up to 2020. The Mayor's Waste Strategy was published in September 2003.
- 2.12 The Mayor's Waste Strategy aims to reduce the amount of waste produced, whilst massively increasing the amount that is recycled or composted. The Strategy also advocates the use of new and emerging technologies where practicable to manage residual wastes that cannot be recycled or composted to reduce London's reliance on landfill¹⁵. The 44 policies contained in the Strategy elaborate on how London can improve and manage its municipal solid waste (hereafter referred to as 'municipal waste'); these are complemented by 101 proposals setting out how they might be achieved.

¹⁵ Progress report on the Mayor's environmental strategies, Report of the Executive Director of Policy and Partnerships, Greater London Authority, 29 April 2004, paragraph 6.1

Chapter 3 Delivery of the proposed alterations

- 3.1 The challenge London faces to manage its municipal waste is enormous. London currently produces an estimated 17 million tonnes of waste every year, ¹⁶ but only has the capacity to manage just 10 million tonnes or 60 per cent of waste produced ¹⁷. The amount of waste we produce is forecast to rise to 25. 8 million tonnes by 2020. ¹⁸
- 3.2 The draft alterations focus on planning for and managing municipal waste produced in London, which accounts for four million tonnes or 23 per cent of the total amount of London's waste.
- 3.3 Only 17 per cent of municipal waste is recycled; this is significantly below the current targets the Mayor has set for London 25 per cent by 2005, 30 per cent by 2010 and 33 per cent by 2015¹⁹. By contrast 70 per cent of municipal waste is exported to landfill sites largely outside London. European and government policy and directives require both substantial reductions in landfill use and increased recycling and composting.
- 3.4 By 2020 London will need an additional 2.9 million tonnes of recycling and composting capacity and 1.9 million tonnes of new technology capacity in order to achieve the requirements of the Landfill Directive and make London self-sufficient in managing its waste. The Landfill Directive sets demanding targets to reduce the amount of biodegradable municipal landfilled. These targets are:
 - By 2010 to reduce biodegradable municipal waste landfilled to 75 per cent of that produced in 1995.
 - By 2013 to reduce biodegradable municipal waste landfilled to 50 per cent of that produced in 1995.
 - By 2020 to reduce biodegradable municipal waste landfilled to 35 per cent of that produced in 1995.
- 3.5 The draft alterations estimate that London will need between 151 699 additional strategic recycling and waste treatment facilities to cope with the increased waste. The additional land needed to deliver these facilities is estimated at 244 hectares or 16.2 hectares per annum between 2005 2020.

¹⁶ Enviros Technical Assessment for Waste management in London 2003

¹⁷ Making London work better, Submission to the Office of the Deputy Prime Minister on the review of powers and responsibilities of the Mayor and the Greater London Assembly, London Assembly/Association of London Government, October 2005, pp 19

¹⁸ Waste Forecast Modelling Technical report, Greater London Authority, February 2004

¹⁹ The London Plan: Spatial Development for Greater London, Greater London Authority, February 2004 pp156

This is equivalent to a total area the size of two Kensington Parks, or an area the size of Green Park being put aside each year.

3.6 We recognise that decisive action is needed, if London is to sustainably manage the waste it produces and avoid the colossal fines²⁰ that will be imposed on London by the European Union if recycling rates are not substantially improved. We commend the efforts of the draft alterations to provide a much-needed steer on how capacity for sustainable waste management might be addressed. However we remain concerned that fundamental aspects of waste planning and management, such as the mismatch between the proposed sub-regional boundaries for planning and the existing ones, and the likely shortfall in the skills and knowledge required to take the waste planning agenda forward could undermine the practical application of the proposals; we consider these in more detail in Chapter 4.

London Single Waste Authority

- 3.7 In September 2005 the Mayor published a proposal paper on how London's waste might be managed in the future²¹. The paper suggests that managing the disposal of London's waste through a single body with a London-wide remit will be more effective than the current fragmented arrangements. The Mayor has submitted his proposals to the Office of the Deputy Prime Minister, to be considered as part of the review of powers and responsibilities of the Mayor and the London Assembly.
- 3.8 Currently, responsibility for disposal of London's municipal waste lies with a combination of four federal groupings of boroughs (funded by levy on constituent boroughs) referred to as Waste Disposal Authorities (WDAs)²² and twelve individual boroughs. The 33 London boroughs act as Waste Collection Authorities and are responsible for collecting waste in their local areas²³.
- 3.9 London's current waste management is fragmented and has been in place for nearly 20 years. As acknowledged in the report by the Commission on London Governance, the challenges waste disposal authorities will face in the future are of a different order to what they have faced in the past, and it timely to

²⁰ Estimated landfill tax fines are calculated at two billion accumulative up to 2020 – Transcript of Environment Committee meeting, 11 October 2005, page 13

²¹ London Single Waste Authority Proposal, Greater London Authority, September 2005. Available at http://www.london.gov.uk/mayor/environment/waste/lswa/index.jsp

²² East London Waste Authority – Barking & Dagenham, Havering, Newham and Redbridge; North London Waste Authority – Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest; Western Riverside Waste Authority – Hammersmith & Fulham, Lambeth, Wandsworth and Kensington and Chelsea; West London Waste Authority – Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond

²³ Making London work better, Submission to the Office of the Deputy Prime Minister on the review of powers and responsibilities of the Mayor and the Greater London Assembly, London Assembly/Association of London Government, October 2005 pp19

- consider whether more strategic arrangements may make these challenges easier to resolve²⁴. We agree that a review of the current arrangements is timely.
- 3.10 We are keen that any future arrangements for managing London's waste allows for greater cohesion between the two key areas of responsibility collection and disposal of waste. Careful consideration will need to be given to how the required synergy and coordination is achieved to realise the overall aim of reducing the amount of waste we produce in London.

²⁴ Making London work better, Submission to the Office of the Deputy Prime Minister on the review of powers and responsibilities of the Mayor and the Greater London Assembly, London Assembly/Association of London Government, October 2005 pp19

Chapter 4 Risks to delivery of the proposed alterations

- 4.1 The draft alterations set out an imposing strategy for waste management that will require leadership, significant investment, and a step change in approaches to waste planning and management in London.
 - Achieving the step change
- 4.2 The Mayor's proposal for a London Single Waste Authority (LSWA) outlines a medium to long-term vision for managing London's waste. The proposal, if accepted, will mean that the earliest the LSWA can become operational is late 2007. In the meantime considerable changes will need to be made at the local level towards achieving improved recycling targets, new and improved waste management facilities and increased efficiency. The changes needed, will have resource and financial implications.
- 4.3 London is some way off from achieving the 25 per cent recycling target set for 2005 and London's municipal waste is set to increase by half as much again. The potential shortfall in meeting the recycling targets coupled with the increase in residual waste is worrying. We appreciate that much work is being done by GLA officers in partnership with the boroughs to increase recycling rates, and recognise the efforts of individual boroughs to increase performance. But we remain a long way off the targets.
- 4.4 Creative solutions will need to be sought to address the poor recycling rates for municipal waste. We believe that there are lessons to be learned from the construction and industrial waste industry, which currently recycles 80 per cent of its waste²⁵.

Recommendation 1

We recommend that the Mayor review approaches taken to recycling in the construction and industrial waste industry with a view to identifying how these might be adapted and applied to municipal waste recycling.

4.5 The draft alterations advocate making full use of new waste management technologies, and the Mayor's willingness to promote technologies such as pyrolysis, gasification and anaerobic digestion was largely embraced by the stakeholders we consulted²⁶. The move towards the use of new technologies is to be commended but will need to be balanced against external influencing factors such as commercial viability.

²⁵ Transcript of Environment Committee meeting, 11 October 2005, page 22

²⁶ Analysis of Draft Alterations to London Plan Policies on Waste and Minerals, Brook Lyndhurst, September 2005 pp15. Copies available at

4.6 The underlying analysis completed by Brook Lyndhurst²⁷ draws attention to the possible 'knowledge gap' within planning authorities. Officers in planning departments may not necessarily know about waste-specific planning issues, whilst officers in environment departments may not have the necessary knowledge about planning issues to deal effectively with planning issues for potential waste treatment facilities. We previously drew attention to our concerns on this issue. (See paragraph 3.6).

The planning framework

4.7 We also raised concerns about the planning framework. (See paragraph 3.6). The draft alterations allocate land requirements by sub-region, to fit in with boundaries defined for the sub-regional frameworks²⁸. However, the geography of waste authorities dealing with disposal contracts in London differs in some locations from the geography of sub-regional spatial planning. As a result, there may be a risk that waste authorities do not take appropriate action if there is no clear leadership in terms of implementation.

Land and facility requirements

- 4.8 There are competing priorities for land use in London. Land is needed for new houses, schools, places of work and other infrastructure. The consideration of where to place the additional waste treatment facilities that will be needed is another to add to the list.
- 4.9 New waste policy 3 states that London requires between 151-699 additional strategic facilities to deal with London's waste. This range illustrates the choice faced by London in terms of the size of its future waste treatment facilities. In order to maximise land use, we would recommend that the London Plan provide a greater steer on what the desired locations for large strategic facilities should be.

Recommendation 2

We recommend that the London Plan provide a greater steer on what the desired locations for large strategic facilities should be.

- 4.10 The preferred option for waste treatment in the Mayor's waste strategy specifies that a mix of smaller and larger units will be required. It would be useful for the London Plan to provide general advice on the *optimum mix* of smaller and larger units.
- 4.11 The draft alterations concentrate on recycling and waste treatment facilities. No consideration is given to reprocessing activities, despite their economic potential and the need to identify suitable markets for recyclable materials such as paper and woodwaste. In the interests of adopting a more integrated approach to

²⁷ Analysis of Draft Alterations to London Plan Policies on Waste and Minerals, Brook Lyndhurst, September 2005 pp16. Available at

http://www.london.gov.uk/assembly/envmtgs/2005/envoct11/envoct11item05a.pdf

²⁸ There are five sub-regional groupings for the development of the sub-regional frameworks – Central, North, South, West and East London. More information is available at http://www.london.gov.uk/mayor/planning/srdf/index.jsp

waste planning, provision needs to be made in the London Plan for large-scale plants and for smaller-scale clusters that could include reprocessing activities.

Recommendation 3

We recommend that the London Plan provide some assessment on the optimum mix of smaller and larger units that will be required for waste treatment. This advice should be based on an assessment of:

- The industry's investment capacity,
- The willingness of the industry and of local authorities via contracts - to bear the proportionately higher costs of smaller facilities,
- Cost-benefit of small versus large scale facilities,
- Potential knock-on effects for other strategies including the Transport Strategy.

Recommendation 4

In the interests of adopting a more integrated approach to waste planning, we recommend that the London Plan make provision for large-scale plants and for smaller-scale clusters that could include reprocessing activities.

Sub-regional self-sufficiency

4.12 The accompanying technical report to the draft alterations - Recycling and Recovery Facilities – Site Investigation in London' recommends that:

The overall strategy should be for a mix of strategic and local facilities across London, with the greatest concentration of strategic capacity provided in the East, as well as West and North London. The development of local capacity should be encouraged, particularly in South London, to encourage local access to facilities and reduce transport by road across the capital²⁹.

- 4.13 In addition, the report states that there is a potential shortfall of available sites in South London. Therefore, one option is for the sub-region to look to the West and East London sub-regions to provide additional capacity, whilst the other is to seek additional opportunities in areas not previously considered, including sensitive land uses³⁰. This does not appear to have been reflected in the sub-regional allocations set out in the draft alterations.
- 4.14 Land requirement per annum in South London is similar to that in North London. Unlike for Central London, no portion of South London land requirement has been re-distributed to other sub-regions with more potential capacity despite the fact that no one borough in South London has been identified as having the greatest site opportunity within the sub-region.

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²⁹ Recycling and Recovery Facilities – Site Investigation in London, Land Use Consultants and SLR Consulting, 2005, p. 105

³⁰ Ibid, p.97

- 4.15 Incorporating new planning guidance into the alterations could help solve potential difficulties to deal with waste from South London. For example, identifying locations in close proximity to South London, but not necessarily within London, could be part of a cross-regional plan to deal with some of London's waste.
- 4.16 Although the South East plans to accept a declining amount of London waste, the South East Waste Management Strategy clearly states that there are occasions when it would be appropriate for some of London's waste to be treated in the South East. For example, the South East would be ready to take some of London's waste if waste is generated in London but close to a treatment facility located in the South East, and vice-versa.

Chapter 5 Conclusions and recommendations

5.1 Below we list the main points and recommendations of our response. Some time has elapsed since the waste management system has been subject to review. We believe that the review is timely, and that significant planning is required to take us into an era of reduced waste, and one in which the potential value of waste is fully realised.

Delivery of the proposed alterations

5.2 We remain concerned that fundamental aspects of waste planning and management, such as the mismatch between the proposed sub-regional boundaries for planning and the existing ones, and the likely shortfall in the skills and knowledge required to take the waste planning agenda forward could undermine the practical application of the proposals. (Paragraph 3.6)

Risks to delivery – achieving the step change

- 5.3 We are keen that any future arrangements for managing London's waste allows for greater cohesion between the two key areas of responsibility collection and disposal of waste. Careful consideration will need to be given to how the required synergy and coordination is achieved to realise the overall aim of reducing the amount of waste we produce in London. (Paragraph 3.10)
- 5.4 Considerable changes will need to be made at the local level towards achieving improved recycling targets, new and improved waste management facilities and increased efficiency. The changes needed, will have resource and financial implications. (Paragraph 4.2)
- 5.5 Creative solutions will need to be sought to address the poor recycling rates for municipal waste. We believe that there are lessons to be learned from the construction and industrial waste industry, which currently recycles 80 per cent of its waste³¹. We recommend that the Mayor review approaches taken to recycling in the construction and industrial waste industry with a view to identifying how these might be adapted and applied to municipal waste recycling. (Paragraph 4.4/Recommendation 1)
- 5.6 The move towards the use of new technologies is to be commended but will need to be balanced against external influencing factors such as commercial viability. (Paragraph 4.5)

Land and facility requirements

5.7 In order to maximise land use, we would recommend that the London Plan provide a greater steer on what the desired locations for large strategic facilities should be. (Paragraph 4.9/Recommendation 2)

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³¹ Transcript of Environment Committee meeting, 11 October 2005, page 22

- 5.8 We recommend that the London Plan provide some assessment on what the optimum mix of smaller and larger units will be required for waste treatment. This advice should be based on an assessment of:
 - The industry's investment capacity;
 - The willingness of the industry and of local authorities via contracts to bear the proportionately higher costs of smaller facilities;
 - Cost-benefit of small versus large scale facilities;
 - Potential knock-on effects for other strategies including the Transport Strategy. (Recommendation 3)
- 5.9 In the interests of adopting a more integrated approach to waste planning, we recommend that the London Plan make provision for large-scale plants and for smaller-scale clusters that could include reprocessing activities. (Recommendation 4)

Sub-regional self-sufficiency

5.10 Incorporating new planning guidance into the alterations could help solve potential difficulties to deal with waste from South London. For example, identifying locations in close proximity to South London, but not necessarily within London, could be part of a cross-regional plan to deal with some of London's waste. (Paragraph 4.15)

Appendix 1 Recommendations

Recommendation 1

We recommend that the Mayor review approaches taken to recycling in the construction and industrial waste industry with a view to identifying how these might be adapted and applied to municipal waste recycling.

Recommendation 2

We recommend that the London Plan provide a greater steer on what the desired locations for large strategic facilities should be.

Recommendation 3

We recommend that the London Plan provide some assessment on what the optimum mix of smaller and larger units will be required for waste treatment. This advice should be based on an assessment of:

- The industry's investment capacity;
- The willingness of the industry and of local authorities via contracts to bear the proportionately higher costs of smaller facilities;
- Cost-benefit of small versus large scale facilities;
- Potential knock-on effects for other strategies including the Transport Strategy.

Recommendation 4

In the interests of adopting a more integrated approach to waste planning, we recommend that the London Plan make provision for large-scale plants and for smaller-scale clusters that could include reprocessing activities.

Appendix 2 List of consultees

Association of London Government
Cory Environmental
Greater London Authority
London Borough of Bromley
London Borough of Newham
London Borough of Southwark
London Development Agency
London Remade
Mouchel Parkman Ltd

Appendix 3 Main features of the Government's Planning Policy Statement 10

Major features of the new PPS10 are:

- A 'plan-led' approach to planning for sustainable waste management. PPS10 requires regional planning bodies to prepare regional spatial strategies (RSS) which provide 'sufficient opportunities to meet the identified needs of their area for waste management for all waste streams. In turn, planning authorities should prepare local development documents that reflect their contribution to delivering the RSS'.
- Regional and local planning strategies are to be considered alongside other spatial planning concerns. They have to integrate effectively with other strategies, including municipal waste management strategies.
- RSS are required to look forward to a fifteen to twenty year period and to include a
 distribution of waste tonnage requiring management by waste planning authority
 area for the waste sectors identified.
- RSS are also expected to include a pattern of waste facilities of national, regional or sub-regional significance. PPS10 states that 'regional planning bodies should identify in the RSS the broad locations where the pattern of waste management facilities should be accommodated'.
- PPS10 states that it is the responsibility of waste planning authorities to identify in development plan documents suitable sites and locations for new waste management capacity.

Appendix 4 London Plan policies on waste and minerals

Section 4A of the London Plan sets out the policies on planning for waste, outlining strategic policy and targets (Policy 4A.1), spatial policies for waste management (Policy 4A.2), and the criteria for selecting waste management and disposal sites (Policy 4A.3). Section 4A also sets out two policies on planning for minerals focusing on better use of aggregates and spatial policies to support it.

Policy 4A1 focuses on increasing the capacity of facilities to manage waste, encouraging increase in waste minimisation, recycling, composting and new technologies and orienting current incinerator capacity towards non-recyclable residual waste.

Policy 4A2, in support of the proximity principle and the need to plan for all waste streams, requires London boroughs in their local development documents to protect and develop existing waste management sites, identify locations for new ones, maximise use of surplus waste transfer sites for other waste uses and promote waste facilities with good access to water or rail transport.

Policy 4A3 requires boroughs to primarily use sites located on Preferred Industrial Locations or existing waste management locations, and consider the environmental and transport impacts of the sites, as well as the proposed nature and scale of activity and the proximity to the source of the waste.

Policy 4A4 states that the Mayor will work with strategic partners to achieve targets for re-use of construction and demolition waste (80 per cent) and re-use of that waste as aggregates (60 per cent) in London by 2011.

Policy 4A5 requires local development plans to outline policies which:

- Identify and safeguard aggregate resources suitable for extraction
- Adopt the highest environmental standards for aggregates extraction in line with National Minerals Policy Guidance
- Support the development of aggregate recycling facilities in appropriate and environmentally acceptable locations, with measures to reduce noise, dust and visual intrusion to a practical minimum
- Safeguard wharves with an existing or future potential for aggregates handling and ensure adjacent development is designed accordingly to minimise the potential for conflicts of use and disturbance
- Protect existing railhead capacity to handle and process aggregates
- Minimise the movement of aggregates by road.

Appendix 5 Orders and translations

How to order

For further information on this report or to order a copy, please contact Carmen Musonda, Scrutiny Manager, on 020 7983 6542 or email to carmen.musonda@london.qov.uk

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Appendix 6 Principles of Scrutiny

The powers of the London Assembly include power to investigate and report on decisions and actions of the Mayor, or on matters relating to the principal purposes of the Greater London Authority, and on any other matters which the Assembly considers to be of importance to Londoners. In the conduct of scrutiny and investigation the Assembly abides by a number of principles.

Scrutinies:

- aim to recommend action to achieve improvements;
- are conducted with objectivity and independence;
- examine all aspects of the Mayor's strategies;
- · consult widely, having regard to issues of timeliness and cost;
- are conducted in a constructive and positive manner; and
- are conducted with an awareness of the need to spend taxpayers money wisely and well.

More information about scrutiny work of the London Assembly, including published reports, details of committee meetings and contact information, can be found on the London Assembly web page at www.london.gov.uk/assembly.

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