

# **The London Plan: Matter 68**

## **Waste and circular economy**

### **Examination in Public (EiP)**



**London Plan EiP  
Matters 68  
Cory written submission**

**Would Policy SI7 provide a justified and effective approach to reducing waste and supporting the circular economy?**

Cory welcomes and supports the London Plan's efforts to integrate the circular economy into the planning regime. In order to make more substantial progress towards increased material reuse and recycling and reduced disposal, the Plan would benefit from explicit recognition of the role waste management development (including energy recovery from residual waste) has in enabling and facilitating circular economy objectives. This would better enable the waste management industry to bring forward a range of waste treatment facilities on suitable locations capable of treating different waste types at the upper levels of the waste hierarchy. Cory welcomes guidance on this to be set out in the proposed Circular Economy Statements.

**Would it further the aims of Good Growth policies GG1-GG6?**

SI7 and the circular economy objectives are consistent with the aims of the good growth policies GG1 to GG4. For example, timely delivery of sustainable waste management development in the right location is needed for the delivery of the new homes for London's growing population (GG4). There are clear synergies with policies GG5 and GG6. By providing a policy push to the circular economy, the London Plan can help promote innovative approaches to reusing waste at its highest value and be a model of good practice for other world cities (policy GG5E). If fully realised, the circular economy will generate new jobs in the capital and attract investment into new waste management infrastructure, supporting the objectives of policy GG5. The waste management industry has a central role to play in improving energy efficiency and transitioning towards a zero-carbon city (policy GG6A). By promoting the circular economy policy SI7 gives further support to the objectives of policy GG6A.

**Would it focus on planning matters of London wide importance? In particular:**

**a) Would the definition of 'circular economy' as set out in paragraph 9.7.1 be justified and would it be effective in reducing waste, increasing material reuse and recycling and reductions in waste going for disposal?**

The definition of the circular economy in policy SI7 is broadly correct, but there is no mention of the importance of recovering value (i.e. energy) from waste that is not recyclable. Policy SI7A(4) recognises there is an important role for the waste sector in generating low carbon energy from residual waste. The supporting text at paragraph 9.7.3 recognises the benefits of low carbon energy generation from waste.

We recommend two additions to paragraph 9.7.1 (in bold italics):

*"A circular economy is one where materials are retained in use at their highest value for as long as possible and are then re-used, recycled **or used to recover energy**, leaving a minimum of residual waste **requiring disposal**."*

Energy from waste is currently the most sustainable option for dealing with London's combustible residual waste, after recyclable materials have been collected. It helps to reduce London's carbon footprint and contributes to the energy mix and energy security, providing reliable, decentralised, low-carbon electricity and heat to businesses and homes. There is no inherent conflict with the waste hierarchy. Separating materials for recycling and reprocessing should be prioritised over energy recovery where there are markets for those materials, but energy recovery is clearly preferred over landfill for non-recyclable, combustible material. To manage London's waste effectively, all levels in the waste hierarchy need to be addressed and the London Plan must provide clear policy support for management of waste at the energy recovery level of the hierarchy.

**b) Would Policy SI7 provide an effective and justified strategic framework for the preparation of local plans and neighbourhood plans in relation to this matter? In particular what is the justification for the waste to landfill and recycling targets set out in Policy SI7A4? Could these be effectively monitored? Bearing in mind the timescales involved would these be effective?**

The London Plan should give direction to Boroughs on how the circular economy should be applied in practice through the planning processes. This is currently lacking, and Policy SI7 A would benefit from recognition that:

- modern recycling facilities are akin to mainstream industrial operations, handling, processing and transporting materials to commodity markets just like any other logistical operation and should not face additional operational restrictions through planning consent than other, similar industries;
- Boroughs should help facilitate greater diversification of the waste management industry through spatial planning that supports the circular economy. Policies should be designed to enable the movement of waste materials to areas where they can cost effectively input into the manufacturing process;
- waste materials are increasingly destined for international commodity markets and it is therefore entirely acceptable to expect waste materials to flow across local authority boundaries (including in and out of London). More flexible planning consents are needed to facilitate this change, thereby allowing the industry to respond to customer and market requirements and evolving circular economy business models

Policy SI7 would benefit from review and improvement to ensure it is capable of providing an effective strategic framework for the preparation of local plans. Suggestions are presented below.

**SI7A (3)**

Cory supports the ambition of ensuring zero biodegradable or recyclable waste to landfill by 2026. This will help to preserve the remaining landfill capacity for wastes that cannot be re-used, recycled or used to recover energy. Policy SI7A should be amended to include reference to energy recovery - these technologies have an important role in both achieving the circular economy and minimising landfill.

The Mayor should consider more positive proposals to help Boroughs to achieve his aims. These could include reforming Extended Producer Responsibility, encouraging improved product design and utilising green public procurement to stimulate demand for recyclable materials. This will help the drive for landfill diversion from the front end of the waste supply chain, where the circular economy will be operating.

We recommend an additional item in policy SI7A:

***“6) encouraging better material selection and secondary material use in new products”***

#### **SI7A(4)**

While the ambition of the stated recycling targets is laudable, Cory is deeply concerned that London’s future waste infrastructure requirements have been underestimated as a result of scenario modelling based on overly ambitious recycling targets, particularly in relation to municipal waste.

It is important to note that the London Plan differs from the LES (from which the recycling targets were derived) and is a statutory, land use plan. It is important to include positive policies, but with little to demonstrate how these targets would be met, the Plan is unlikely to deliver the desired planning outcomes. We note that the draft Plan’s assumptions around recycling rates are inconsistent with a raft of other recently published reports (see links below) which generally place expected recycling rates by 2030 in the 50-55% range. Additionally, the GLAs target exceeds the targets established through the EU Circular Economy Package (CEP).

Defra’s Resources and Waste Strategy sets a target of 65% recycling by 2035. The recycling rate for the UK as a whole is 45% currently, but London’s recycling rate is substantially lower than this at 33%, primarily because urban environments present much greater recycling challenges and their corresponding recycling rates remain consistently lower than the national average. The International Recycling Rate Comparison Project commissioned by LWARB and the GLA in 2016<sup>1</sup> suggests that of the 35 cities studied, only one (Melbourne) achieves a municipal waste recycling rate of over 50%.

Whilst we commend the Mayor’s ambitions for recycling, based on our industry experience, including working in seven London Boroughs, Cory considers that it is unrealistic to expect London to achieve this target by 2030. Not least, there is a failure in the draft London Plan to provide any substance in terms of the implementation of measures to achieve this level of recycling. The LES identifies a 7.8% gap in meeting the LACW recycling target (see Figure 69, also represented in Cory submission to M69) which would place even greater reliance on achieving over 70% recycling in the C&I waste stream. To base requirements for waste management infrastructure capacity on unrealistic recycling targets fails to properly assess and plan for London’s likely future needs. Cory believes the CEP targets, and those set out in the Resources and Waste Strategy, will be distributed differently across England; not every authority will be expected to achieve those targets as this is recognised to be an unrealistic achievement.

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<sup>1</sup> <https://www.lwarb.gov.uk/wp-content/uploads/2016/09/LWARB-International-recycling-rate-comparison.pdf>

**SI7A(5)**

We welcome measures to ensure the design of developments support separate collection of wastes but note the specified range of materials is limited. CEP extends the separate collection requirements to include textiles and household hazardous waste (by 2025).

We propose an amendment to A(5) (set out in bold italics) which would ensure that new developments in London are consistent with legislative requirements and evolving good practice:

*“design developments with adequate and easily accessible storage space that supports the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) food **and other wastes.**”*

**9.7.3A**

Newly inserted text notes that no new energy from waste capacity is needed (beyond two additional plants in construction) if the recycling targets in 9.7.3 are met. We object to the inclusion of paragraph 9.7.3 and request it to be removed:

The statement is prejudicial to EfW technology. This is inappropriate for a land use policy document, which, in line with national policy, should remain technology neutral.

Further, it conflicts with the Waste and Resources Strategy, in which Defra welcomes market investment in new residual waste treatment infrastructure<sup>2</sup>, including modern, efficient, EfW facilities.

Tolvik Consulting’s October 2018<sup>3</sup> report presents a more detailed picture for London and the south east, and notes a 2.6 million tonne EfW capacity shortfall by 2025 under a zero waste to landfill scenario.

Without providing a proper framework within which to address the waste infrastructure capacity gap that exists both today and into the future as a problem in London, there is little hope of the London Plan delivering its stated aims of reducing the export and landfilling of waste.

Cory has consistently challenged the credibility of the evidence base supporting the London Plan and the resultant underestimation of residual waste that will require treatment over the plan period. This approach will result in higher costs (as waste travels further) and poorer environmental outcomes as London fails to reduce its reliance on landfill and fails to benefit from the advantages of residual waste treatment, including supply of renewable/lower carbon energy.

The NLHPP will simply replace existing capacity at Edmonton, which means that the only source of new capacity comes from the Beddington ERF, which is contracted to the South London Waste Partnership with little or no surplus capacity for other wastes. The draft London Plan states that in 2015 London exported 11.4 million tonnes of waste and that over 5 million tonnes went to landfill. Even with the desired increase in recycling, there is little doubt that London will need more residual waste treatment capacity, not least to reduce London’s reliance on landfill.

<sup>2</sup> <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england/resources-and-waste-strategy-at-a-glance>

<sup>3</sup> <http://www.tolvik.com/wp-content/uploads/Tolvik-Full-Report-2018-Residual-Waste-in-London-and-the-South-East.pdf>

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*RDF export*

Tolvik Consulting's report estimated 1.72 million tonnes of RDF exported overseas from London and the South East. This is substantial missed opportunity for London (and the South East) to benefit from a renewable/low carbon fuel to meet energy demands, and to provide associated social, environmental and economic benefits.

**c) Would it provide an effective framework for development management? In particular, would the requirement for a Circular Economy Statement in relation to referable applications be effective and justified?**

Cory supports the requirement for a Circular Economy Statement and sees this as a useful measure to replace Site Waste Management Plans. Such statements should help developers to consider resource efficiency and the waste hierarchy when managing waste from construction projects. However, there is no reference to the recovery of energy from waste as a useful component of the circular economy.

We recommend an addition to policy B(1) (in bold italics):

***“how all materials arising from demolition and remediation works will be re-used, recycled and/or used to recover energy”.***

