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Matter 68: Waste and Circular Economy

Would Policy SI7 provide a justified and effective approach to reducing waste and supporting the circular economy? Would it further the aims of Good Growth policies GG1-GG6? 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?

We welcome Policy SI7’s aims, and Paragraph 9.7.1’s references to the need to retain materials in use at their highest value for as long as possible, and to minimise residual waste. This will support the Mayor’s London Environment Strategy targets to reduce per capita waste.

Paragraph 9.7.1 is consistent with the principles as outlined in the Resources and Waste Strategy for England (December 2018)¹ and the EU Circular Economy Package. The Plan’s definition of ‘circular economy’- which we support - is consistent with that accepted by the waste industry and other stakeholders including the Ellen McArthur Foundation.

We welcome the Mayor’s suggested revisions to the draft Plan at paragraph 9.7.4 A, in regards to the expectation that circular economy statements will be submitted to support development applications.

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?

We would like to understand the evidence base underpinning the justification for the recycling targets in Policy SI7, and we will continue to work with the

¹ <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>

Mayor's officers to understand this further. The targets around waste reduction and net self-sufficiency, embedded in SI7A4 (and SI8A1) remain ambitious, considering the low recycling rates and rates of contamination of recycling collections by inner London Boroughs, and other factors such as, the higher overall waste arising.

The evidence base for the Further Alterations to the London Plan (FALP) in 2015, identified a gap of between 1.8 and 4.1 million tonnes of treatment capacity over the period of the plan to 2041, in order to meet the current targets. The tonnage of materials recovered for recycling in London has dropped in recent years and there is little evidence of major increases in recycling capacity being delivered in the short or medium term.

The targets in SI7 that the Mayor has set, bring forward the EU Circular Economy Package (CEP) targets by 5 years. These EU targets are challenging, and require significant behaviour change to meet these. We have reservations because we are unclear that there is sufficient capture of recyclables, from the overall amount of waste generated in the municipal waste stream. We consider that it will be very challenging to meet policy targets in the timescales given, without a detailed programme of targeted investment in facilities.

Monitoring is essential in the delivery of London Plan targets. There is sufficient data (made available by the Environment Agency and Defra), which, together with studies by bodies such as the Waste and Resources Action Programme, can provide an evidence base for the performance of the waste management industry. This should be carried out by the GLA via an annual monitoring report. The report should be based on relevant key performance indicators (KPI's), and could be done in collaboration with Regional Technical Advice Boards and other key stakeholders.

London's performance against the Mayor's targets for waste, (particularly commercial, industrial and inert), can be monitored through the data returns from permitted facilities which we hold and share with the Mayor's officers. Knowledge gaps, such as the amount of materials handled at 'exempt'² facilities, can be estimated using a standard methodology, developed for Defra. Please also refer to our statement on Matter 94. Monitoring in regards to recommended KPI's.

The new approach to collating data, as outlined in the Resources and Waste Plan for England (2018), means that there may be more data collected during the life-span of the Plan which will allow better monitoring of the Plan.

² Some waste operations that are considered to be low risk are exempt from needing a permit and can operate under a type of waste registration called an 'exemption' instead.
<https://www.gov.uk/guidance/register-your-waste-exemptions-environmental-permits>

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?

The policy approach to the adoption of Circular Economy Statements, in regards referable developments, is consistent with the overall aims to move waste up the waste management hierarchy, and to reduce the waste arising by extracting maximum value from resources.

It means that developers must look in detail at the materials inputs and outputs, and materials management of their proposals throughout the lifespan of projects. Circular Economy Statements for referable developments would be an important driver in adopting greater 'circularity' in a way that is appropriate for the particular needs of London, and would lead by example.

Excavated materials have been removed from the overall targets, and the need for a separate approach to this waste stream has been identified, through the GLA's ongoing engagement with the Regional Technical Advisory Boards (RTAB's) for waste in the wider South East. We have been a party to these discussions. Notwithstanding, the significant quantity of excavated materials produced by major infrastructure projects, particularly nationally significant infrastructure projects (NSIP's), remains an issue that we would welcome further discussion on. An approach to overcoming the logistical and other challenges associated with this waste stream from these projects should be identified by the Mayor, based on GLA-led engagement with the industry and other key stakeholders.