

**HEARING STATEMENT – DB CARGO UK LTD**

**Respondent Number: 2232**

**M68 and 69: Waste and Circular Economy**



## 1. Introduction

- 1.1 This Hearing Statement is submitted by DB Cargo UK Ltd in relation to M68 and 69 Waste and Circular Economy. It focuses in particular on the following questions:

*Matter 69: Would Policy SI8 and SI9 provide a justified and effective approach to providing for London's waste and promoting self-sufficiency? In particular:*

*Part a) is the target of self-sufficiency by 2026 as set out in SI8A1 realistic?*

*Part d) do the policies provide an effective and justified framework for development management, including would Policy SI8D provide an effective and justified framework for the evaluation of proposals for new waste sites or to increase the capacity of existing waste sites?*

*Part e) would the policies be effective in safeguarding existing waste sites particularly in relation to SI19C?*

## 2. The Role of Rail in Supporting Construction and Transportation of Waste

- 2.1 The London Plan sets the policy framework for ambitious levels of growth in the form of new homes and jobs and outlines the significant investment in supporting infrastructure required to support this, including projects such as Bakerloo Line extension, HS2, Crossrail 2, Lower Thames Crossing and Thames Tideway. These levels of construction activity will create unprecedented additional demands for the inward movement of construction materials and for the sorting and processing and onward transport of construction waste.
- 2.2 As outlined in our representations on the Draft New London Plan and Statements in relation to Matters 62 and 63, the efficient movement of freight is critical to support these growth ambitions and the environmental and economic benefits of rail over road are clear and compelling.
- 2.3 London's reliance on rail will increase significantly with the need to deliver against growth targets in the context of significant concerns over congestion and air quality. The London Plan acknowledges the challenges in delivering the anticipated levels of growth in a way which is environmentally sustainable. The Plan sets ambitious targets for London as a zero-carbon city by 2050, ambitious targets for improving air quality, particularly in areas where large scale development is taking place, as well as objectives for London to be a healthier city with less congested streets.
- 2.4 Planned levels of growth and ambitions over waste minimisation and recycling also necessitate greater efficiencies and integration of systems for processing, recycling and transport of waste. This requires a strategic policy framework which recognises and promotes the need for large, efficient facilities with rail access which enable these activities be integrated on one site. An example of this is the DB Cargo UK Ltd Eurohub facility at Barking where there is considerable scope for vertical integration with complementary industrial uses including processing and recycling of construction waste. This leads to greater efficiencies and further reduction in HGV trips.
- 2.5 Policy SI8 and SI9 recognise the need to protect existing waste sites as well as the need to plan of the provision of new facilities and additional capacity. However, the policy as drafted does not do enough to articulate the role of rail in sustainable transportation of both municipal and construction waste and does not sufficiently articulate the benefits of flexible facilities with potential to integrate waste sorting, processing and recycling activities efficiently on one site. Also, the policy should recognise that greater efficiencies and reconfiguration of activities could lead to opportunities for more effective use of land including development for other uses. DG

Cargo UK Ltd is also concerned that the current definition of self-sufficiency does not recognise the role of sites, in close proximity to London and linked by rail, in recycling London's waste sustainably and supplying useable materials to London as part of moving to a circular economy.

2.6 DB Cargo UK Ltd considers that policies across the Plan on industrial land, transport, waste and aggregates need to be amended to recognise the important interrelationships between these activities. For the reasons set out in this document, and our previous statements on Matters 62 and 63, DB Cargo UK Ltd consider that this lack of integration across the policies of the plan undermines the effectiveness of the Plan and represents a missed opportunity to plan strategically for the necessary infrastructure to support growth in a sustainable manner.

### **3. Additional Policy on Rail Freight**

3.1 As outlined in our previous statements, DB Cargo UK Ltd considers that an additional policy on rail freight should be included in the Plan and that policies on waste should be cross referenced to this policy to underline the role of rail and rail linked facilities in sorting, processing, recycling and transportation of waste. The proposed wording is re-produced below.

*Development Plans should safeguard and promote the development of new rail-linked sites for freight handling and related activities including processing, recycling and transportation of waste. These sites and facilities should be safeguarded unless it can be demonstrated that they are no longer viable or capable of being viable for rail-based freight handling and related uses. The factors to be considered in assessing the viability of rail-linked freight handling sites include:*

- *Ability to support a range of related activities including transport, handling and processing of aggregates, storage, sorting and processing and onward transport of waste*
- *Long term market demand and strategic function within the wider logistics chain to support London's growth*
- *Potential to perform last mile consolidation function*
- *Location and proximity to the strategic rail and road network and existing and potential markets*
- *Existing and potential contribution towards catering for freight movements by non-road modes*
- *Potential to re-configure and/ or consolidate to operate more efficiently.*
- *The location and availability of capacity at alternative rail-linked facilities in the light of current and projected market demands.*

### **4. Comments and Suggested Amendments to Policies SI8 and SI9**

4.1 DB Cargo UK Ltd supports Part A, sub-section 4 of Policy SI8 which states that new waste management sites should be provided where required

4.2 Part B of the Policy which requires Development Plans to allocate sufficient land for waste management facilities and identify suitable locations for such facilities. However, sub-section c should be amended to include rail linked sites with an existing or future potential for waste and secondary material management. Currently the policy only refers to wharves and so fails to recognise the important role of rail.

4.3 DB Cargo UK Ltd particularly supports Part C, which states that development proposals which deliver a range of complementary waste management and secondary material processing facilities on a single site will be particularly encouraged.

- 4.4 Part D of the policy deals with criteria for assessing development proposals for new waste sites or to increase the capacity of existing sites. DB Cargo UK Ltd support sub-section 5 which expresses support for the use of rail to transport waste.
- 4.5 DB Cargo UK Ltd supports the approach to excavation waste and the deletion of the reference to excavation waste from the waste recycling targets set out in Part A of Policy SI7. This approach recognises the particular characteristics of excavation.
- 4.6 However, DB Cargo UK Ltd considers that the policy and supporting text do not recognise the important role that specialist recycling facilities, in close proximity to London which can be sustainably served by rail, can play in recycling London's waste and contribute to meeting recycling targets. The recycled product can then be transported back to London by rail for effective use in the London economy. The current definition of self-sufficiency in Policy SI8A (1) and the criteria in 9.8.4 do not recognise the important role of these facilities in recycling London's waste. This lack of support for sustainable cross boundary movements could undermine these activities.
- 4.7 It is suggested that an additional paragraph of supporting text should be added after Section 9.8.3 as set out below:
- “It is recognised that certain specialist recycling facilities, which are in close proximity to London and are served by sustainable modes including rail can play an important role in recycling London's waste and facilitating the move towards a more circular economy”*
- 4.8 Paragraph 9.8.4 should also be amended to recognise activities which take place in close proximity to London and linked by sustainable modes as well as activities within London. Paragraph 9.7.5 should recognise and support the role of rail in transporting both municipal and construction waste.
- 4.9 DB Cargo UK Ltd supports the general approach to safeguarding waste sites in SI9 but consider that the Policy should recognise that reconfiguration of sites and more effective use of land can also justify release or partial release of sites.