

London Plan Examination in Public – Written Statement

Respondent Number	2536
Organisation	London Assembly Planning Committee
Contact name	Paul Watling
Email	Paul.watling@london.gov.uk
Telephone	020 7983 4893
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M69. Would Policy S18 and S19 provide a justified and effective approach to providing for London’s waste and promoting net waste self-sufficiency? In particular:

- a) Is the target of net self-sufficiency by 2026 as set out in Policy S18A1 realistic? What is the justification for excluding excavation waste within the net self-sufficiency target? In light of this would it be justified?**

It is important to reduce waste arising, increase recycling rates, and reduce the size of the residual waste stream. These goals are already achieved elsewhere in the world. Seoul has a 65 per cent municipal recycling rate, and other cities such as Adelaide, Melbourne, Los Angeles and San Francisco also achieve rates substantially higher than London. The Mayor has shown how meeting these sustainable waste management goals will reduce residual waste for incineration to within London’s existing or consented waste to energy capacity, and minimise landfill demand. The Committee has previously supported London aiming to become a zero-waste export city, as Londoners both gain the benefits (such as recycled materials, electricity, heat, employment) and take responsibility for their own environmental impacts and other costs. The need for more capacity will be in recycling, and the Environment Committee endorses additional recycling capacity within London as a sustainable way for London to manage its own waste.

- d) Would they provide an effective framework for development management? In particular, would the criteria in Policy S18C accord with national policy? Would Policy S18D provide an effective and justified framework for the evaluation of proposals for new waste sites or to increase capacity of existing waste sites?**

The Assembly, drawing on work by the Environment Committee on decentralised energy and waste to energy, recommended in response to the original draft of this London Plan, that In Policy S18 C4 references to combined heat and power and combined cooling heat and power should be deleted. In Policy S18 C3 the words ‘renewable energy generation, especially’ should be deleted to restrict its application to lower-carbon technologies such as anaerobic digestion. Anaerobic digestion should be actively promoted. Waste to energy incineration is below recycling and composting in the waste hierarchy, and less carbon-efficient and less circular than anaerobic digestion, and so should not be encouraged over these forms of waste management. ‘Organic waste’ in a municipal context typically refers to paper, card, food waste and garden waste, which can be dealt with by these more sustainable methods. A CHP carbon floor of 400g/kWh does not compare well with other heat sources such as waste heat, fuel cells, nor with grid electricity.

Environment Committee has previously recommended that the Mayor should limit waste to incineration, as follows: The Mayor's commitment to stop sending any waste to landfill is welcome. But he also needs to limit the amount of waste sent unnecessarily to incineration. Putting waste into landfill has been steadily declining and landfills will close within the next decade. It will not be good enough if waste that was previously sent to landfill is simply sent to incineration instead. The residual waste stream must shrink in size, through waste reduction, reuse and recycling, and not just be redirected.

e) Would they be effective in safeguarding existing waste sites particularly in relation to Policy SI9C?

The Environment Committee has not examined safeguarding waste sites, but has previously recommended that The Mayor should set targets to reduce the total amount of biodegradable and recyclable waste sent to landfill and incineration by 2026 — and set targets to further reduce the amount by later dates.