

ORGANISATION	LONDON FIRST
ID	1588
MATTER	M69 WASTE AND CIRCULAR ECONOMY

M69. Would Policy SI8 and SI9 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 SI8A1 realistic? What is the justification for excluding excavation waste within the net self-sufficiency target? In light of this would it be justified?

1. London First considers that a target of net self-sufficiency by 2026 is not realistic under the current policy framework presented within the draft London Plan, particularly in view of the lack of provision for residual waste treatment capacity. National policy is clear that development plans such as the London Plan should remain technology neutral. The current wording of Policy SI8C (3) is explicitly biased toward anaerobic digestion and fails to consider that conventional Energy from Waste (EfW), alongside other technologies, is a key element of the Circular Economy, contributing towards renewable energy generation.
2. London First therefore recommends that the wording of Policy SI8C (3) should be amended to delete reference to organic/biomass waste:

*3) contribute towards renewable energy generation, **especially** ~~renewable gas technologies from organic/biomass waste~~*
3. In London First's written statement pursuant to Matter 68, evidence is set out that demonstrates that the draft Plan has underestimated the required waste management capacity for energy recovery. Unless the Plan actively delivers additional EfW capacity within London to meet its realistic future needs, then it will struggle to meet the net self-sufficiency target. The production of Refuse-derived Fuel (RDF) and Solid Recovered Fuel (SRF) in London is likely to continue to be destined for export, with the benefits of energy and materials recovery realised elsewhere. This directly contradicts the stated aim of policy SI8 (i.e. net self-sufficiency). Continuing the export of RDF/SRF to *mainland*

Europe means that London misses out on the benefits of a renewable/low-carbon fuel to meet its energy demands.

4. London First submits that the draft Plan should commit to the delivery of additional waste management capacity, including residual waste treatment capacity, to address the likely shortfall. In order to facilitate the development of needed waste management infrastructure, London First recommends the following additions to Policy SI8A (1) and (4):

- A 1) *the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026, **through the delivery of additional recycling and residual waste treatment capacity***
- 4) *new waste management sites should be provided where required **to help address London's waste recycling and residual waste treatment capacity shortfall***

b) Are the Borough forecast arisings of household and commercial and industrial waste as set out in table 9.1 based on robust evidence? What waste streams are excluded and what is the justification for excluding them? In light of this are they realistic and justified?

1. London First shares the concerns raised by experts within the waste management sector regarding the robustness of the figures in Table 9.1, and believes that they represent an underestimate of the total waste required to be managed by London over the Plan period. The evidence base fails to properly consider future arisings, fails to apply robust assumptions to waste growth forecasts, and – as stated in London First's statement on Matter 68 – is reliant on overly ambitious recycling targets.
2. London First therefore recommends that a new and updated waste arisings review should be undertaken, which utilises the most recent planning guidance on waste, is fully transparent over all data input assumptions, and makes use of the most up-to-date data available. It would also be prudent to factor in 'contingency planning' within the predicted waste arisings. This would help ensure sufficient waste management capacity is maintained during periods of plant downtime or maintenance, and would also help future-proof the borough-level apportionments should waste arisings turn out higher than predicted by the London Plan, which London First considers highly likely.

3. In this context, London First recommends a new point (4) is inserted into the list at Policy SI8B:

B (4) identify additional land for waste treatment facilities and which enables contingency to be factored into the stated apportionment figures.

c) Is the apportionment of waste to be managed in Boroughs, as set out in table 9.2, justified? What waste streams are excluded from the apportionments and what are the provisions to deal with those waste streams? As some waste streams are not included would the apportionments be effective in ensuring that the waste targets in Policies SI7 and SI8, the Borough apportionments in table 9.2 and the aspirations for net self-sufficiency and shifting towards a low carbon circular economy would be met?

1. As noted above, waste arisings forecasts are based on incomplete data and are an underestimate of London's total waste arisings. The same data is used in Table 9.2 to calculate borough-level apportionments, which therefore replicates the error, and risks the likely prospect of the Plan's waste management targets not being met.
2. The waste management infrastructure requirements for London and at the individual borough level are likely to have been significantly underestimated if apportionment figures do not take full account of all the waste streams which make up London's total waste arisings.
3. Paragraph 9.8.9 of the draft Plan notes the need for a reduction in exports in order to achieve net self-sufficiency. London First believes that additional waste management capacity is required within London, for both recycling and treatment of residual waste, in order for the Mayor to meet net self-sufficiency targets.

d) Would they provide an effective framework for development management? In particular, would the criteria in Policy SI8C accord with national policy? Would Policy SI8D provide an effective and justified framework for the evaluation of proposals for new waste sites or to increase capacity of existing waste sites?

1. National Planning Policy for Waste (section 4) is clear that development plans should remain technology neutral. Within draft Policy SI8C (3) there is currently a strong bias towards anaerobic digestion, and against other energy recovery technologies. There is a range of EfW technology capable of generating renewable and low-carbon energy, which should also be explicitly

recognised. The draft Plan also removes the flexibility to respond to future technological developments.

2. Accordingly, London First recommends the wording of Policy SI8C (3) should be amended to delete the reference to organic/biomass waste:

C (3) *contribute towards renewable energy generation, **especially***
~~**renewable gas technologies from organic/biomass waste**~~"

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

1. No comment.