

London Plan topic paper: Waste

January 2018

1. This report outlines the key issues of relevance to the policies for waste in the new draft London Plan and summarises some key external research reports which were commissioned by the GLA as part of the development of these policies.
2. Research in four keys areas:
 - a. Forecasts to 2041 of Household and Commercial & Industrial Waste;
 - b. Forecasts to 2041 of Construction, Demolition & Excavation and Hazardous Waste;
 - c. Data on waste imports into/exports out of London, treatment methods;
 - d. Updating the 2006 apportionment methodology to distribute the total amount of waste London is forecast to produce between the boroughs.

Context

3. Waste is currently defined as anything that is discarded. In 2015 London produced just under 18 million tonnes of waste. This was split between;
3.1mt of Household Waste produced by London's households, dealt with by, or on behalf of, the boroughs;
5.0mt of Commercial & Industrial waste produced by London's businesses, dealt with largely by the private sector;
9.7mt of Construction, Demolition and Excavation Waste produced by development activity, dealt with by the private sector.
4. Like both of his predecessors, the Mayor is committed to London becoming net self-sufficient for waste management. This means that capacity to deal with waste is equal to the amount of waste created. However, waste activities, including contracts, do not recognise administrative boundaries and waste flows between London, other parts of the UK (principally the Wider South East) and Europe. As such it does not automatically follow that a waste site in London deals with London's waste. In 2015, London managed 7.5mt of its own waste, imported 3.6mt and exported 11.4mt of its waste. This gives London a net self-sufficiency figure of approximately 60%. There is an element of double counting in waste that accounts for the difference between the numbers given in paragraphs 3 and 4.
5. The Mayor views waste as a resource to be exploited, not a problem for disposal. Waste is a valuable source of materials, energy and jobs that the Mayor wants to see developed for the benefit of London and Londoners. His actual powers to influence where waste is managed are limited, not being a waste planning authority. However the Mayor does influence waste by requiring boroughs to safeguard sufficient waste sites to achieve net self-sufficiency and set performance criteria for waste facilities to maximise recycling and efficient low carbon waste to energy generation. In addition, through the London Waste and Recycling Board (LWaRB), the Mayor can influence waste by helping to fund new facilities in London, supporting borough recycling initiatives and sharing best practice. Waste Authorities (boroughs and statutory waste disposal authorities) need to be in general conformity with the waste elements of the Mayor's Environment Strategy when undertaking their functions. This is ensured through the waste contracts (for Local Authority Collected Waste) and strategies and the Mayor has the power to direct a waste authority if required. The London Plan provides the framework to help deliver on the Mayor's ambitions for waste policy.

6. The Mayor wants to see waste being used, not merely being sent to landfill. Landfilling is expensive (£100 per tonne, £84 of which is the landfill tax), unpopular with those receiving it and increasingly a short-medium term solution. Landfills receiving London's waste are expected to close by 2025 and they are not being replaced.
7. Under the 2007 amendments to the Greater London Authority Act 1999, the Mayor has a duty to contribute towards the mitigation of, or adaptation to, climate change in the United Kingdom. Through the London Plan, the Mayor is able to ensure that his suite of policies, including waste, are designed to help mitigate against and adapt to climate change.

London Plan Policies

8. Policy SI 7 sets out the Mayor's approach to waste reduction through promotion of the circular economy and improved recycling performance. Policy SI 8 sets out locations and types of waste facilities the Mayor would like to see and criteria against which applications will be judged. It also gives each borough an amount of waste to plan for to 2041. Policy SI 9 seeks the safeguarding of sites in waste use, setting out criteria covering their loss to other land uses. These policies are underpinned by updated evidence, provided by SLR Consulting Ltd.
9. As noted above, London is dominated by three waste streams, Household waste (HH), Commercial waste (C&I) and Construction, Demolition and Excavation waste (CD&E). SLR consulting were appointed to produce waste forecasts up to 2041 for these waste streams (as well as Hazardous waste). The task report 1¹ sets out the methodology they followed and the numbers produced for Household and Commercial & Industrial waste streams. Task report 2² sets out a methodology and the numbers produced for CD&E and Hazardous waste streams. These reports set out total amounts of waste that can then be apportioned. The task 2 report explains the problems of estimating CD&E waste and why the Plan does not apportion CD&E waste, focussing on HH and C&I waste instead. This gave a London total (of HH and C&I) that could then be apportioned to each borough.
10. London exports over 7 million tonnes of waste, with the vast majority going to the East of England and South East. Under the duty to cooperate officers have attended meetings with the EE and SE to discuss waste exports. Task report 3³ sets out data on waste exports to help the neighbouring regions plan for London's waste exports. It helps meet paragraph 44 of the National Planning Policy Guidance on Waste (NPPGW) (October 2015) that notes *"Given the unique waste needs of London, there is likely to be a need for waste planning authorities surrounding London to take some of London's waste. The Mayor and waste planning authorities in London should engage constructively, actively and on an ongoing basis with other authorities, under the duty to cooperate, to help manage London's waste."*
11. SLR and LUC consultants were also appointed to update the apportionment methodology⁴. The apportionment methodology gives each borough its own

¹https://www.london.gov.uk/sites/default/files/forecasts_for_household_and_commercial_industrial_waste_report_1_-_gla_waste_arisings_model.pdf

² https://www.london.gov.uk/sites/default/files/task_2_-_cdew_and_haz_waste_forecasts.pdf

³ https://www.london.gov.uk/sites/default/files/task_3_-_strategic_waste_data.pdf

⁴https://www.london.gov.uk/sites/default/files/updating_the_apportionment_method_methodology_report_low_res.pdf

apportionment that it needs to plan for to comply with Policy SI 8. This is discussed in further detail below (see paragraphs 18-23).

Forecasts of Household (H/H) and Commercial & Industrial (C&I) Waste to 2041

12. Table 9.1 of the consultation draft of the London Plan sets out forecast arisings by borough to 2041. These forecasts were derived using the same methodology used for the 2015 London Plan, found sound by that Inspector. For household waste the amount of waste generated per household is held constant and multiplied by GLA Demographic forecasts for households in each borough at 5 year intervals 2021,2026,2031,2036 and 2041. For commercial and industrial waste the amount of waste per employee by sector is held constant, based on the findings of the 2009 Defra waste survey. This is then multiplied by the GLA Economic employment projections by sector for the same time periods to give a total amount of C&I waste. It is then further assumed that if a borough had 3% of London's employment in 2009 that it will continue to have 3% of the employment and thus the C&I waste over the Plan period.
13. These forecasts will be helpful to boroughs to meet their waste requirements. In paragraph 42 the NPPGW it advises that *"Apportionments of waste to London boroughs set out in the London Plan provide a benchmark for the preparation of Local Plans and a basis for Annual Monitoring Reports. Waste planning authorities should have regard to the apportionments set out in the London Plan when developing their policies. The Local Waste Plan will need to be in general conformity with the London Plan."*
14. This approach of 'having regard to' waste numbers is different from, and less prescriptive than, the earlier guidance set out in PPS10 (March 2011, para 9) that *"the tonnages of waste requiring treatment should be apportioned by waste planning authority area."* Despite this change, the Mayor still believes it is important to set out apportionments in the Plan. As noted above, there is a need to provide land for waste uses so that London can derive the benefits waste offers and the need to find alternative ways of managing waste other than via rapidly dwindling landfill sites.

Forecasts of Construction, Demolition and Excavation Waste (CDE) and Hazardous Waste to 2041

15. This work has been carried out to help the boroughs plan for waste. The task 2 report sets out the difficulties of estimating CDE waste. Given the very clear advice set out in this report the Mayor has chosen not to apportion this large waste stream. Hazardous waste, is a small component of London's waste total and is a sub-set of household, commercial and construction waste.
16. This report also contains estimates of how long landfill capacity, for all waste streams, will last in each of the three areas, London, East of England and the South East. Data from the Environment Agency provides information on the remaining void space at existing landfill sites. Taking current rates of landfilling provides an estimate of remaining capacity, the picture reinforces the Mayor's aims of moving away from landfill to make better use of waste. The data shows that, at current rates, London has 3 years capacity remaining, the East of England has 9 years capacity remaining and the South East 14 years.

Strategic Waste Data

17. This report sets out data on the amounts of waste imported into and exported out of London, how and where it is managed. It shows that when London exports its waste, 91% of it goes to the East of England (49%) and the South East (42%). Approximately 5.4mt of London's waste goes to landfill with c.5.1mt going to the Wider South East with the East of England (2.9mt) taking slightly more than the South East (2.2mt).

Apportionment Study

18. SLR Consulting Ltd were appointed to produce forecasts of waste arisings to 2041. SLR and Land Use Consultants (LUC) were appointed to update the waste apportionment methodology. Since early alterations to the London Plan in 2006, the Plan has had the same apportionment methodology. It was considered that the review of the Plan represented the ideal opportunity to update this methodology. Apportionment is the percentage of London's total waste each borough must plan for in their local plan. Apportionments and arisings can be very different things, Westminster generates a high volume of arisings but has little land to deal with them, leading to it having a very low apportionment. Conversely, Bexley generates little waste itself (arisings) but has a lot of waste capacity so has a much higher apportionment.
19. The apportionment methodology takes a number of different criteria, eg amount of land for waste, capacity of the transport network to move waste around, designations that prevent development, converts them into a percentage and then gives each borough a total percentage summed from each of the criteria. The detail is set out in the task report 4. This total percentage is then applied to the London total, giving each borough its own apportionment that it needs to plan for, to comply with Policy SI 8 and these are the numbers set out in Table 9.2.
20. The approach in the adopted plan dates from 2006 that methodology had 9 criteria giving different weightings to different criteria. It paired two criteria together and gave them a double weighting. This meant that patterns of historic waste movements and capacity were given primacy in determining apportionment scoring. For the Plan review seven criteria have been modelled;
 - capacity – ability of a borough to handle waste,
 - arisings – amount of H/H and C&I waste forecast to be produced by 2021,
 - sustainable transport modes - ability to move waste by rail and/or water,
 - road network capacity – capacity of the road network to move waste,
 - Land Use/Environmental factors – designations that reduce a borough's ability to host waste sites (SINCs, Listed Buildings etc),
 - Flood risk – likelihood of a borough having a flooding issue, and
 - Socio-economic factors – levels of deprivation in a borough.
21. In March 2017 a workshop took place at which LUC discussed their proposed approach with boroughs. LUC modelled each of these seven criteria giving each criterion in turn a weighting of 40% and all other criteria a weighting of 10%. This produced borough level apportionments showing the impact of these weightings on borough level numbers. The eighth testing scenario gave all seven criteria an equal weighting (14.3%) and again produced borough level apportionments based on this equal weighting.

22. For the consultation draft of the London Plan the Mayor has chosen to go with the eighth option, of equal weighting for all criteria. The previous methodology was criticised for giving a higher weighting to certain criteria, which had the impact of moving waste towards boroughs that had historically always dealt with waste. The Mayor believes that if all these criteria are worthy of including in the modelling they are worthy of equal weighting. The Mayor recognises there may be boroughs or groups of boroughs that favour one approach over another but believes this to be a reasonable approach to waste apportionment.
23. Apportionment moves waste around London. This approach of moving waste around London via an apportionment methodology is supported by the NPPGW in paragraph 7 which deals with the need for each waste planning authority to manage all its own waste – it advises *“Though this should be the aim, there is no expectation that each waste planning authority should deal solely with its own waste to meet the requirements of the self-sufficiency and proximity principles. Nor does the proximity principle require using the absolute closest facility to the exclusion of all other considerations. There are clearly some wastes which are produced in small quantities for which it would be uneconomic to have a facility in each local authority. Furthermore, there could be significant economies of scale for local authorities working together to assist with the development of a network of waste management facilities to enable waste to be handled effectively.”*
24. Using local waste sites is in line with the Mayor’s draft Environment Strategy (August 2017)⁵ Objective 7.4 which seeks to *“maximise local waste sites and ensure London has sufficient infrastructure to manage all the waste it produces”*.

Conclusion

25. Taking into account the evidence outlined in this report and the wider context of waste policy, the proposed policies presented in the draft London Plan are considered to be an appropriate approach to addressing the Mayor’s responsibilities and ambitions in respect of waste. It is considered that these policies requirements strike a reasonable and appropriate balance between driving up standards for waste in London and taking into account technical feasibility and financial viability.

⁵ https://www.london.gov.uk/sites/default/files/london_environment_strategy-draft_for_public_consultation.pdf