

Meeting:	Strategic Planning Advisory Panel
Date:	Wednesday 4 th January 2006
Subject:	Draft London Plan Alterations – Planning for Waste; Planning for Minerals – Public Consultation
Responsible Officer:	Group Manager-Planning and Development
Contact Officer:	Dennis Varcoe – Group Planner
Portfolio Holder:	Planning, Development and Housing
Key Decision:	No
Status:	Public

Section 1: Summary

Decision Required

The Panel is requested to recommend to Cabinet that the specific issues for Harrow contained within the covering report, together with the joint response prepared on behalf of the West London boroughs (attached as Appendix 1), be forwarded to the Mayor in reply to the Draft London Plan Alterations – Planning for Waste; Planning for Minerals – Public Consultation.

Reason for report

The Mayor has prepared draft Alterations to London Plan policies on Planning for Waste and Planning for Minerals. The draft Alterations are the subject of a 3-month public consultation, which started on 17th October. The policies and associated targets, which are eventually included in the London Plan, will provide the strategic guidance for the development of policies in the Core Strategy of the Local Development Framework. The Council would wish to respond at this stage. In addition, the boroughs within the West London Waste Authority (WLWA), who have agreed in principle to prepare a joint Waste Development Plan Document (DPD), have prepared a joint response to the Mayor's consultation. (This response, however, was not prepared through WLWA).

Benefits

The opportunity for the Council to comment will enable the Mayor the opportunity to feed these into the Examination In Public to be held on the draft Alterations. Targets determined through this process will be statutory, and the Council will need to consider these in the preparation of the Local Development Framework.

Cost of Proposals

Costs of preparing this response are within the approved Departmental budget.

Risks

Failure to comment would expose the Council to implications that it was entirely in agreement to the methodology for determining borough allocations of waste, and all other aspects of the draft London Plan Alterations in relation to waste and minerals. It would also undermine the joint working which is also essential to development of a joint Waste DPD.

Implications if recommendations rejected

Consideration would need to be given to any further action needing to be taken, including if this involved representations that would need to be pursued at the Examination In Public into the Draft London Plan Alterations.

Section 2: Report

2.1 Brief History

When the Mayor published the London Plan in February 2004, he also indicated that further research would be undertaken on sites for waste recycling and waste treatment, with a view to bringing forward updated waste planning policies. These have now been published.

Context in the draft Alterations – the Mayor views the challenge of managing London's waste as immense, and that although London re-cycles half its waste, it is the second worst performing English region for recycling municipal waste. The Mayor also takes the view that dependence on using landfill sites is not a sustainable solution (and in future will attract financial penalties). London must deal with its own waste here, in London. The Mayor considers that London must move progressively towards high rates of recycling and recovery. The adequacy of London's existing waste management and disposal facilities has been evaluated.

Policies in the draft Alterations

Minor additions have been made to the current policies 4A.1 – 4A.2 in the London Plan, and the supporting justification. The supporting text to policy 4A.3 (criteria for selecting sites for waste management and disposal) has been supplemented by new paragraphs 4.10a – 4.10d which set out the requirements of PPS10 (paragraph 4.10a); show the different waste stream totals to 2020 in respect of improving self sufficiency in waste to be managed in London and waste to be exported from London. Para 4.10d refers to a new Annex 10 which present municipal and commercial/industrial waste projections at borough level for key milestones through to 2020. The projections (in thousand tonnes per annum) for Harrow are:-

	2010	2013	2015	2020
Municipal	137	145	151	166
Commercial/Industrial	146	156	164	182

Six new waste policies have been added, covering the following issues:-

- Policy 1 – Existing provision-capacity, intensification, re-use and protection
- Policy 2 – Additional land requirement for recycling and waste treatment facilities
- Policy 3 – Numbers and types of recycling and waste treatment facilities
- Policy 4 – Broad locations suitable for recycling and waste treatment facilities
- Policy 5 – Construction and demolition waste
- Policy 6 – Hazardous waste.

The development of a Harrow response has been informed by work undertaken by the joint West London waste (land use) planners' group (West London boroughs' joint response at Appendix 1), and the submission of the Association of London Cleansing Officers (ALCO) (Appendix 2). Accordingly, it is suggested that the Harrow response purely focuses on the main areas of concern.

1. Harrow Response

Context

The Council collects municipal waste in the borough, which accounts for approximately 25% of the total waste arising (the rest comprising commercial and industrial; construction and demolition; and hazardous waste). The removal and disposal of this waste is undertaken by WestWaste (WLWA), which is developing a joint Municipal Waste Management Strategy within it's constituent boroughs. This strategy should be adopted by April 2006. The consideration of planning applications for waste processing facilities put forward by WLWA or its partners will be a matter for the relevant Borough local planning authority in which the proposal is located to determine. This Council would use the Harrow Unitary Development Plan (HUDP) and the London Plan in assessing proposals, whilst the draft London Plan Alterations would also be a material consideration.

Particular concerns issues for Harrow

There are three general concerns:-

- a). As a fundamental issue, it is not clear what is meant by self-sufficiency for waste management in London, and clarification is needed.
- b). The Mayor is not clear about the number of sites likely to be required. In reality, the numbers and types of sites required may not be as high as is indicated. This would have fundamental implications on the search for sites, and the resultant landtake required.
- c). The Mayor effectively does not countenance incineration as being an acceptable technology, even for treatment of residual waste. Clearly any sustainability appraisal would have to include evaluation of this option.

2. The joint response on behalf of WLWA

The suggested response to the draft Alterations is set out in detail as Appendix 1 to the report.

3. The comments of the Association of London Cleansing Officers (ALCO)

The ALCO response to the draft Alterations is set out in detail as Appendix 2 to the report, for information.

2.2 Options considered

The preparation of a separate Council response has been pursued, together with a joint West London response. The comments of the Association of London Cleansing Officers (ALCO) have valuably informed this process.

2.3 Consultation

Undertaken with other West London boroughs.

2.4 Financial Implications

Costs are contained within the approved Departmental budget.

2.5 Legal Implications

The Council is, by virtue of the Greater London Authority Act 1999, a statutory consultee in the process of the alteration or replacement of the spatial development strategy (the London Plan).

The Council's response to the draft joint Municipal Waste Management Strategy will be reported to the WLWA board in January/February when all the responses will be considered. The final version of the strategy will be subsequently circulated to all the constituent authorities for approval. Once approved by WLWA and the six constituent authorities, the strategy will be submitted to the Mayor for London and DEFRA for final approval.

2.6 Equalities Impact

The Draft London Plan Alterations, by providing strategic guidelines on waste facility types, numbers and suggested broad locations promotes equality of opportunity to access local facilities.

2.7 Section 17 Crime and Disorder Act 1998 Considerations

Any design constraints on proposed waste management sites relating to crime will be addressed at either the pre-application stage or in the production of development briefs.

Section 3: Supporting Information/Background Documents

Background Documents:

Background Documents: Draft Alterations to the London Plan – Housing Provision Targets, Waste and Minerals – public consultation (July 2005, and October 2005).

**DRAFT ALTERATIONS TO THE LONDON PLAN POLICIES ON
WASTE**

**JOINT RESPONSE FROM WEST LONDON BOROUGHES OF
BRENT, EALING, HARROW, HILLINGDON, HOUSLOW AND
RICHMOND.**

DRAFT ALTERATIONS TO THE LONDON PLAN POLICIES ON WASTE JOINT RESPONSE FROM WEST LONDON BOROUGHES

1. The Draft Alterations to London Plan were published for public consultation in October 2005 and include six new waste policies. The following comments represent a response from the 6 West London Boroughs (Brent, Ealing, Harrow, Hounslow, Hillingdon and Richmond) who are proposing to work jointly on the production of a joint Waste Development Plan Document. (More borough-specific comments are also being submitted by individual Boroughs). Whilst the Draft Alterations have been informed by a strategic London-wide assessment of the adequacy of existing sites to meet the 85% target for London self-sufficiency by 2020, this response has been informed by further research undertaken for the West London boroughs on commercial/industrial waste and site availability.
2. Policies 4A.2 and 4A.3 – General comment - Table 4A.2 and 4A.3 effectively show the same info, only they represent the opposite extremes of this information. Suggest deleting Table 4A.3.

3. **Policy 4A.3 – Criteria for the Selection of Sites for Waste Management and Disposal**

The following addition has been included to this policy – ‘**The Mayor will work with the South East England and East of England regional authorities to co-ordinate strategic waste management across the three regions**’. Whilst this addition is supported, appropriate acknowledgement should also be given to the necessity for boroughs to similarly engage with local authorities outside the capital. The following addition is therefore suggested – ‘**London Boroughs should work with appropriate local authorities adjoining or close to London in developing their joint Waste development plan documents.**’

4. ***New Waste Policy 1: Existing provision- capacity, intensification, re-use and protection***

Boroughs should protect existing waste sites and facilitate the maximum use of existing waste sites, particularly waste transfer facilities and existing landfill sites. If for any reason an existing waste management site is lost to non-waste use, an additional compensatory site provision will be required that normally meets at least the maximum throughput that the site could have achieved.

This policy will be particularly important in this sub-region, and West London boroughs should support it and ensure it is implemented at the local level. The GLA Waste Sites Investigation estimated there to be a shortfall in non-transfer capacity in the West London Sub-Region of over four million tonnes by 2020. This means that existing waste sites in West London are a precious resource that should be safeguarded to avoid the capacity gap increasing further still.

5. Furthermore, West London has a large number of waste transfer facilities in comparison to the other London sub-regions. As the sub-region becomes increasingly self-sufficient, there is likely to be less of a requirement for transferring waste to landfill sites outside of London, which potentially frees up this existing resource for a change of operation to non-transfer processes e.g. recycling, composting. Up to half (45.4ha) of the additional provision required for West London (as defined by London Plan sub-regional boundaries) might be provided through change of use of transfer stations. Safeguarding and making the most of existing waste facilities, including transfer stations, should be a priority in

developing policies for West London to meet future capacity needs, assuming that Boroughs consider that such sites are suitable for continued use. It should, however, be acknowledged that there may be exceptional situations where it is not possible to provide the required compensatory site provision.

7. It might be helpful for a general comment to be included on the approach to maintaining existing sites in the Green Belt (see also general comment (paragraph 28 below) on Green Belt/MOL).
8. It is self-evident also, that the more existing sites can be protected, there will be less of a requirement to secure sites through the planning system for the construction of new facilities, which is likely to be challenging and take time.
9. ***New Waste Policy 2: Additional land requirement for recycling and waste treatment facilities***

The overall additional requirements for waste management sites managing municipal and commercial and industrial waste (over and above the re-use/intensification of existing sites) in London to 2020 is forecast to be 244 hectares (16.2 hectares per annum, 2005-2020).

At the strategic level, sufficient potential capacity has been identified as capable of implementation in local and strategic employment locations to meet the sub-regional requirement.

In order to ensure sufficient land capacity to meet the indicative sub-regional provision in the period 2005-2020 shown in Table 4A.4, London boroughs in their development plan documents should:

- **Identify enough addition land capacity to contribute sufficiently and appropriately to the achievement of sub-regional provision.**
- **Collaborate at the sub-regional level in order to ensure that each borough allocation is sufficient to meet cumulatively the sub-regional apportionment.**
- **With the Mayor, keeping the indicative sub-regional apportionments under review and monitor progress towards their achievement.**

For the West London Sub-Region the indicative provision for additional land is 53.6ha or 3.6ha per annum. This includes a re-allocated amount from Central London. Details of this re-allocation are set out in table 4A.4. Further explanation would be useful in the alterations regarding the re-apportionment of Central London's waste. It is still unclear why the South Sub Region did not get any of this re-allocation.

10. The Draft Alterations refer to sub-regional boundaries defined by the London Plan, which for West London includes the boroughs of Brent, Harrow, Ealing, Hillingdon, Hounslow and Hammersmith and Fulham. In practice, the joint Waste Development Plan Document will cover a slightly different geographical area, which is based on the West London Waste Authority area, and includes Richmond but excludes Hammersmith and Fulham.
11. It will be important for West London Boroughs to discuss with both the GLA and neighbouring authorities and sub-regions how sub-regional apportionments will be met, whilst avoiding undue delays in delivering increased capacity for waste management. Planning Policy Statement 10 states that planning authorities should provide a framework in which communities take more responsibility for their own waste. Developing a future

planning strategy for West London that reflects this principle may be more relevant than the imposition of administrative boundaries, which can sometimes appear artificial. It will be necessary, however, for West London to manage a proportion of central London's waste, due to a lack of suitable and available land in the Central Sub Region.

12. Work carried out on behalf of the West London Boroughs suggest that allocating an additional 53.6 ha within the sub-region by 2020 is not wholly unrealistic. However, achieving a figure of 3.6ha additional capacity per annum from this year is likely to be challenging, and a flexible approach is likely to be needed to allow a phased delivery of new land, whilst ensuring targets, particularly in relation to municipal waste, are met. Factors such as land values and competing land use e.g. housing, employment, land ownership constraints and public perception are likely to reduce the potential area of opportunity in West London considerably. The significance of each of the planning constraints affecting sites will need to be considered in more depth before any additional waste allocations can be made in a DPD.
13. Table 4A.4 sets out indicative sub-regional provision of additional land requirement for strategic recycling and waste treatment facilities. Paragraph 4.10i sets out assumptions made in respect of the allocation of sites/land for potential waste use within the overall assessment of industrial land demand, and the need for other land not also required for housing use (see London Housing Capacity Study, July 2005), to be identified by West London boroughs. This of course assumes that waste facilities included within industrial land demand can acceptably be accommodated within available industrial/employment areas.
14. Paragraph 4.10j then adds that at a strategic level, sufficient potential capacity has been identified to suggest that the sub-regional apportionment in Table 4A.4 can be met. Notwithstanding this, in view of the greater environmental constraints usually associated with locating waste management facilities outside industrial locations, the West London boroughs have reservations about the relative amount of additional provision expected in such locations. Consequently, it may be necessary to increase the amount of land for waste management facilities included within industrial land demand, whilst acknowledging the possible knock-on effects on housing capacity.
15. Clarification is sought from the GLA as to how the alteration relates to the sub regional areas and how this is reflected in the apportionment is given. Figures relating to the additional land requirement for recycling and waste treatment facilities, sub-regional distribution of facilitates and waste projections for municipal and commercial industrial should relate to the West London waste authority sub region and not the London Plan sub-regional development framework boundaries.
16. The need for co-ordinated action to address negative public perceptions and raise awareness of the need to manage waste in a more sustainable way would be greatly assisted through London-wide initiatives through the GLA, Boroughs, and other partners as well as with residents at a local level. Of equal importance will be a need to engage effectively with the waste management industry, particularly in realising the full potential for change of use of transfer stations.
17. Amendments to the wording of the policy - The first two paragraphs of the policy should be deleted and placed in the supporting formation – it is contextual information, not policy. Consideration should be given to boroughs providing sufficient land capacity to meet the borough waste projections set out in Annex 10, as opposed to the indicative sub-regional provision shown in Table 4A.4. it would helpful to include reference to the number and extent of existing waste management sites in the reasoned justification.

18. ***New Waste Policy 3: Numbers and types of recycling and waste treatment facilities***

Boroughs in their development plan documents should identify a range of waste management facilities to manage a capacity of 13.5 mt municipal and commercial/ industrial waste, to be provided 2005-2020 in accordance with the locational criteria set out in Policies 4A2 and 4A3.

The mix of facility types set out in the Draft Alterations is based on recycling facilities, which if well planned and designed will be suited to industrial locations, and potentially a wider range of locations through more sensitive design. Energy from Waste has not been included within the mix of technologies. Although this type of facility may have negative impacts such as the visual intrusion of a chimney stack and the effect of emissions on air quality, the land take requirement is likely to be lower.

19. Para 4.10k states that London requires between 151-699 additional strategic facilities to deliver the 13.5 mt additional capacity required. In practice, the numbers of facilities to be provided will be determined by the type of planning strategy West London boroughs wish to implement, including the extent to which larger strategic facilities are concentrated in industrial areas. The policy provides a good degree of flexibility to determine a mix of sizes of facility. Size and type of facility will also be highly dependent on what the waste management industry perceives to be cost effective and deliverable. In cost effectiveness terms, however, it would appear to be likely that the industry would usually prefer larger (strategic) facilities, rather than smaller, local facilities.

20. Para 4.10k – A comment should be added at the end of the paragraph to acknowledge the true situation in London, whereby for some boroughs neither the option to provide a large number of small facilities (i.e. the sustainability ideal) nor the provision of a smaller number of large scale facilities, simply does not exist.

21. West London Boroughs support the inclusion of a new criterion in Policy 4A.2 for the re-use of surplus waste transfer sites for other waste uses, given the extent of the waste transfer resource in the sub-region.

22. ***New Waste Policy 4: Broad locations suitable for recycling and waste treatment facilities***

Boroughs in their development plan documents should identify adequate provision for the scale of the waste use identified. The broad locations for these facilities are:

- **Strategic Employment Locations (Preferred Industrial Locations and Industrial Business Parks-see Map4A.1 and Table 4A.7);**
- **Local Employment Areas; and**
- **Existing Waste Management Sites.**

The Draft Alterations highlight eight areas in West London within which recycling and waste facilities could be located (see extract from Table 4A.7 below). The draft Alterations have referred to the Great Western Road PIL in Ealing. This is incorrectly named. It should be renamed the Great Western Industrial Park. Should the reference to Brent/Barnet Staples Corner PIL in the table not be amended to indicate that it is in the North sub-region?.

Table 4A.7 (extract) - Suggested strategic employment locations within which recycling and waste treatment facilities could be located (Source GLA)

Sub-Region	Borough	Broad Location/location type
West	Brent/Barnet	Staples Corner PIL
West	Brent	Wembley & Neasden PIL
West	Brent/Ealing/Hammersmith & Fulham	Park Royal IBP/PIL
West	Ealing	Northolt, Greenford, Perivale PIL (parts)
West	Ealing	Great Western Road PIL (part)
West	Hillingdon	Hayes Industrial Area PIL
West	Hillingdon	North Uxbridge Industrial Estate IBP

PIL = Preferred Industrial Location

IBP = Industrial Business Park

23. New waste policy 4 indicates the broad locations suitable for recycling and waste treatment facilities. These include Strategic Employment Locations, which comprise Preferred Industrial Business Parks and Industrial Business Parks. It is generally understood that Industrial Business Parks are designed for businesses requiring a high quality environment. Would waste facilities be suitable in such areas? Presumably this would depend on the nature and compatibility of the waste facility proposed. Similarly there could be conflict with Local Employment Areas.
24. Many of the potential waste sites identified in research undertaken for the West London boroughs fall within one of the Strategic Employment Locations listed above. Whilst these sites are likely to be the primary locations for waste sites within West London, the West London boroughs suggest that the Alterations are more explicit about the degree of flexibility for seeking opportunities outside Strategic and Local Employment Sites and existing waste facilities.
25. The degree to which West London Boroughs pursue this will depend on the type of waste planning strategy that is considered most appropriate for the sub-region as whole. Map 3.4 also illustrates that large areas of West London appear to have little or no opportunity for siting new waste management facilities based on the sources of sites investigated. Areas such as the London Boroughs of Harrow and Richmond and north Hillingdon will therefore be highly reliant on waste management facilities on large industrial estates such as Hayes and Park Royal. This may be a less sustainable planning strategy in terms of factors such as volumes of traffic and emissions, than one, which promotes a waste management infrastructure which is more integrated with local communities.
26. West London boroughs will need to consider the distribution of potential sites across West London which takes into account the siting criteria found in Policies 4A.2 and 4A.3 of the London Plan. Of particular relevance will be the criterion 'proximity to source', suggesting a need to locate facilities near to the businesses and residential areas. This may require more flexibility in relation to Green Belt policy in particular. In this respect, paragraph 3 of PPS 10 states that:

'Regional planning bodies and all planning authorities should, to the extent appropriate to their responsibilities, prepare and deliver planning strategies that: protect green belts but recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications, that these locational needs, together with the wider environmental and economic benefits of sustainable waste management, are material considerations that should be given significant weight in determining whether proposals should be given planning permission.'

27. PPS 10's assertion above, and existing London Plan Policy for waste facilities to be located near to the source of the waste arising, mean that a flexible yet cautious approach will need to be taken to siting of new waste facilities in areas of Green Belt. This is particularly relevant when Green Belt sites already accommodate compatible land uses including existing waste facilities.
28. Just as it is agreed that it would be helpful if additional guidance/advice was provided in respect of existing sites, which are located in the Green Belt, similar guidance should be provided in respect of sites located in Metropolitan Open Land ((MOL).

29. ***New Waste Policy 5: Construction and demolition waste***

The Mayor will and boroughs should support new construction and demolition waste management facilities in London by encouraging recycling at existing sites, using mineral extraction sites for recycling and ensuring that major development sites are required to recycle by using mobile facilities on site wherever practicable. The Mayor, the Environment Agency and other regional partners will work together to minimise construction and demolition waste and associated environmental impacts. Development Plan Documents should require developers to produce site waste management plans to arrange for efficient materials and waste handling.

Construction and Demolition waste facilities are not considered in the Draft Alterations' capacity forecasts because London already recycles around 90% of this waste stream. West London boroughs support this policy and will seek to ensure it is reflected in the development of a Joint Waste Development Plan Document. Whilst there are particular opportunities to pursue this policy in relation to minerals extraction sites and existing recycling facilities in the sub-region, it remains the responsibility of individual boroughs in the sub-region to decide the appropriate location of these.

New Waste Policy 6: Hazardous waste

The Mayor will work in partnership with the Boroughs, the Environment Agency and industry to provide and maintain direction on the need for hazardous waste management capacity.

Development Plan Documents should:

- **Make provision for hazardous waste treatment plants to achieve, at regional level, the necessary waste management requirements.**
- **Identify suitable sites for the storage, treatment and re-processing certain hazardous waste streams.**
- **Identify sites for the temporary storage, treatment and remediation of contaminated soils and demolition waste during major developments.**

19. No comments.

20. Additional general comments.

a) The draft Alterations now refer to the Mayor working with the two bordering regional authorities to co-ordinate strategic waste management across the three regions (Policy 4A.3). However, they do not contain any significant acknowledgement to the implications of the nature, volume and movement of waste coming into the region. This also applies to future projections.

b) The importance of the need for many existing transfer stations to become recycling and waste treatment facilities is acknowledged. It appears, however, that insignificant thought has yet been given to the transitional waste-handling arrangements that will need to be in place whilst such sites are converted, adapted or redeveloped.

**DRAFT ALTERATIONS TO THE LONDON PLAN POLICIES ON
WASTE**

**COMMENTS OF THE ASSOCIATION OF LONDON CLEANSING
OFFICERS (ALCO)**

Policy 4A.1	<p>The policy sets out the capacity requirements necessary to achieve 85% regional self-sufficiency by 2020. Clarification as to what is meant by self-sufficiency for waste management in London is needed. Does self-sufficiency include the export of -</p> <ul style="list-style-type: none"> Separated recyclable materials to processors? Mixed recyclables for sorting/ reprocessing? Organic waste for composting/anaerobic digestion? MBT flock/RDF for energy recovery? Residual waste for energy recovery? <p>The retention of waste in London provides economic and employment opportunities but land in London is both limited and expensive. Reprocessing capacity for some waste streams (i.e. paper, glass and cans) is well established elsewhere in the UK and it seems unlikely that such facilities would be moved to London - because of the restrictions on land availability and high land costs.</p> <p>The policy also needs to recognise that the proximity principle is as valid as regional self-sufficiency. It would not be sensible if an outer London borough were to be prevented from using a processing facility that was located just across the border with an adjacent county.</p> <p>The policy also needs to consider the possibility that waste will be imported into London for processing. There are already examples of this occurring and, as the need to meet the Landfill Directive increases, waste will inevitably move across the boundary between London and its neighbours in both directions.</p> <p>Boroughs are also required to ensure that land resources are available to implement the Mayor's Municipal Waste Management Strategy, Waste Strategy 2000, the Landfill Directive and other EU directives on waste. If the proximity principle and some or all of the above exports were viewed as acceptable, the land requirements indicated in the draft alteration could be significantly different.</p> <p>The Mayor's preference for other forms of energy recovery such as new and emerging advanced conversion technologies over conventional incineration should be reviewed to ensure that it is in compliance with "Changes to Waste Management Decision Making Principles in Waste Strategy 2000" – published by DEFRA in July 2005.</p> <p>Maximising opportunities for recycling and composting is fully supported but any decision on subsequent options for recovery should depend on a thorough examination of all the alternatives. As currently set out, the Mayor's preference appears to effectively exclude incineration without reference to environmental impact, deliverability, costs or community engagement.</p>
Policy 4A.2	<p>Provided self-sufficiency is carefully defined in relation to Policy 4A.1, Policy A4.2 answers many of the questions raised concerning self -sufficiency, the proximity principle and import and export of waste and is therefore supported.</p>
Policy 4A.3	<p>The suggested criteria for identifying sites in boroughs' development plan documents are supported.</p>

Para 4.5	<p>The Alteration should take the opportunity to use the 2004/5 figures for the percentage of municipal waste that is recycled. This will allow the document to reflect the significant increases in recycling that have occurred over the last few years. Outer London Boroughs in particular have made significant progress. Five Boroughs and one disposal authority exceeded their 2005/06 targets a year early in 2004/05 and the picture has further improved in 2005/6. Of the 18 authorities in England short-listed for Beacon status for “Waste & Recycling” for 2006 three are London Boroughs.</p>
Table 4A.1	<p>Similarly, the opportunity to use updated figures should be taken.</p>
Para 4.6	<p>The high levels of recycling and composting, indicated, should be reviewed to ensure that they are compatible with best environmental practice. Whilst it may be desirable to set high targets, the use of 50% and 60% should be avoided until the legislative changes and other measures (hinted at in the document) are in place. The existing statement, in Policy 4A.1, of exceeding 30% by 2010 and 33% by 2015 is sufficient. Achieving higher levels will require significant changes in public attitude and acceptance. The difficulty of achieving this change should not be underestimated.</p>
Para 4.7	<p>Maximising opportunities for recycling and composting is fully supported .</p> <p>The Mayor’s preference for other forms of energy recovery such as new and emerging advanced conversion technologies over conventional incineration should be reviewed to ensure that it is in compliance with “Changes to Waste Management Decision Making Principles in Waste Strategy 2000” – published by DEFRA in July 2005.</p> <p>Any decision on subsequent options for recovery should depend on a thorough examination of all the alternatives. As currently set out, the Mayor’s preference appears to effectively exclude incineration without reference to environmental impact, deliverability, costs or community engagement. The proposals do not show why emerging advanced conversion technologies should be considered in preference to conventional incineration when dealing with residual waste</p>
Para 4.8	<p>See comments in 4.7 above.</p> <p>This paragraph explicitly excludes incineration as a waste recovery option. This appears to contravene both DEFRA guidance and the Mayors strategy that states that waste management options should be subject to BPEO (or its equivalent).</p>

Para 4.9	<p>See comments in 4.7 and 4.8 above.</p> <p>Both national waste policy (Waste Strategy 2000) and the Mayor's Municipal Waste Management Strategy envisage significant increases in recycling and composting. This will inevitably lead to current incinerator capacity becoming reoriented towards non-recyclable residual waste. However this should not lead to this type of waste being transported across London to feed existing incinerators. Non-recyclable residual waste should be treated, as far as possible, in accordance with the Proximity Principle and sub-regional self-sufficiency.</p> <p>The Mayor does not explain why mass burn incineration (i.e. EfW) would crowd out the development of recycling and composting or why emerging technologies would not do so. Providing that waste authorities set out, in their waste strategies, to comply with the waste hierarchy, recycling and composting levels will be determined before the question of how to deal with residual waste arises. Residual waste treatments should be designed for the anticipated tonnage of residual waste. The choice of technology should depend on a full assessment of all the options in accordance with DEFRA guidance and local circumstances.</p> <p>The proposed alteration to the London Plan should not preclude the possibility that some additional incinerator capacity might be needed to treat residual waste in parts of London.</p> <p>It would be helpful if the Mayor's preference for "other new and emerging technology including mechanical and biological treatment before new mass burn capacity" could be more fully explained.</p>
Table 4A2 and Table 4A3	<p>As above, clarification is sought as to what is meant by self-sufficiency for waste management in London. Does this include export of -</p> <ul style="list-style-type: none"> Separated recyclable materials to processors? Mixed recyclables for sorting/ reprocessing? Organic waste for composting/anaerobic digestion? MBT flock/RDF for energy recovery? Residual waste for energy recovery? <p>The retention of waste in London provides economic and employment opportunities but land in London is both limited and expensive. Reprocessing capacity for some waste streams (i.e. paper, glass and cans) is well established elsewhere in the UK and it seems unlikely that such facilities would be moved to London - because of the restrictions on land availability and high land costs.</p> <p>If some or all of the above exports were viewed as acceptable, the land requirements indicated in the draft alteration could be significantly changed.</p> <p>The Mayor also needs to consider the possibility that waste will be imported into London for processing. There are already examples of this occurring and as the need to meet the Landfill Directive increases waste will inevitably move across the boundary between London and its neighbours</p>
Para 4.10c	<p>It would be useful if the sub-regional groupings of waste planning authorities were aligned more closely to the existing groupings for waste disposal authorities. The existing mis-match is confusing</p>

<p>New Waste Policy 1</p>	<p>Supported in principle. However maximising use of facilities would need to be within the 75% licence capacity used in the report to ensure that sites do not breach planning and waste management licence conditions Making additional compensatory provision needs to be clearly defined and the process for acceptable replacement made clear to avoid this slowing down the development of new facilities or improvement of areas where waste facilities are inappropriately located. Defining all sites in the central region as "key" whilst sensible in principle may not be sensible in practice. The definition of sites should be linked to waste management licensing requirements, with facilities not requiring exemptions from WML not needing protecting in the same way. Conversion of existing transfer capacity into treatment capacity underwrites a significant amount of the shortfall. Whilst this will happen to an extent and should be pursued in policy terms the expected capacity will not necessarily be straight line as is assumed in the accompanying report. A transfer station shipping 100,000 tpa is not going to occupy the same space as a pyrolysis plant / RDF etc.</p>
<p>Para 4.10e</p>	<p>The strategic London-wide assessment needs to be viewed with care. As above, it needs to be made clear what is meant by regional self-sufficiency. To what extent does the export of waste to reprocessing plants meet this target. This has to be clearly set out as it could have significant impact on the eventual capacity required in London. Municipal waste comprises approx. 25% of the total amount of waste generated in London. This waste is to some extent directly under the control of waste authorities in London. Other wastes are dealt with, almost exclusively, by the private sector. Market forces will be a big factor in the development of waste processing plants. This will inevitably mean that there will be pressure to locate facilities where land is readily available and of lower cost. (i.e. outside London).</p>
<p>New Waste Policy 2</p>	<p>See above comments on self-sufficiency and land-take. A confusing picture about sub-regional self-sufficiency exists. All Boroughs are tasked to be as self sufficient as possible but there is a recognition that the central region can never be self sufficient and that JWDAs may tie up shortfalls from central SR boroughs. This indicates a need for a timetable and scheduling of sub-regional site specific work and the provisional nature of allocations. The allocation of sites that results from the process undertaken in the accompanying SLR report does not appear to provide a sufficient and well spaced network. The methodology chosen to make the allocations does not take into account a sustainability assessment. This, combined with the potential level of inaccuracy of the data and the poor return of Borough information means that the likelihood of a sustainable network of waste management facilities being developed is diminished. Good policy requires good information. It is suggested that any waste facility in excess of 10 ktpa is a significant site in planning terms (neighbours would say so perhaps) and so the 50 ktpa distinction is perhaps too high given the level of facilities now on the ground and the wish to leave open the possibility of smaller facilities delivering the strategy. There remains the possibility that a Borough outside the central area could do little to identify new sites, and thereby claim a low contribution to the sub-regional allocation possibly even allowing development on "non-key" facilities and thereby lowering their overall number of waste facilities. The process should be robust enough to eliminate this possibility.</p>

Para 4.10g Table 4A4	<p>There is some concern at the sub-regional reallocation of additional land, which appears to be strongly biased towards East London. It is recognised that there appear to be more development opportunities in this area, but this does raise concerns about adverse effects on the Proximity Principle and transport impacts.</p> <p>See above comments on the definition of self-sufficiency and balancing this with the proximity principle.</p>
New Waste Policy 3	<p>Supported. However see comments above on self-sufficiency and land-take.</p> <p>The mix of facilities identified in this section includes some regionally essential facilities for which there are limited opportunities to develop in London.</p>
Para 4.10h Table 4A5	<p>The omission of any data for incineration plants in Table 4A5 and the exclusion of incineration in Para 4.10h should be reviewed in respect of residual waste treatment options.</p> <p>Table 3.1, in the strategic London-wide assessment of recycling and recovery facilities*, gives a fuller picture both in terms of processes and range of capacities. I.e.</p> <p>MBT – small (60,000 tonnes), large (250,000)</p> <p>Gasification – small (50,000), large (240,000)</p> <p>EfW – small (50,000), large (400,000)</p> <p>Thus at the lower end of the scale, any of these technologies could be applicable for dealing with residual waste. The proposed alteration should not seek to differentiate between different recovery options. Decisions on which option to use should be made in accordance with DEFRA criteria and local circumstances. See comments on Paras. 4.7 to 4.9.</p> <p>Planning guidance should not be used to exclude legitimate and proven technical solutions.</p> <p><i>*Recycling and recovery facilities, Sites investigation in London. Mayor of London , July 2005.</i></p>
Para 4.10l	<p>The Proximity Principle is supported, as is the need to balance the benefits of smaller, local sites against the overall demand for land for waste. Local decisions need to reflect local constraints.</p>
New Waste Policy 4	<p>Supported.</p> <p>However there was some concern that the policy may lead to some areas of London being asked to provide waste management facilities substantially in excess of their own requirements – because they contain more of the potential strategic locations. Perhaps these concerns would be addressed by referencing back to Policy 4A.3 and criteria such as proximity, scale, emissions and transport impact</p>
Para 4.10n Table 4A6	<p>See comments on Para 4.10h and Table 4A5</p>
New Waste Policy 5	<p>Supported</p>
New Waste Policy 6	<p>The treatment of hazardous waste is a specialist activity and it may not be appropriate for this type of facility to be located in London. Suitable facilities may need to be located to serve several regions.</p> <p>Whilst boroughs should be reminded that they should seek to identify such sites, it may well be that suitable sites are difficult to locate within London.</p>

