

ED-CRE1

City Plan 2040 Topic Paper – WASTE AND CIRCULAR ECONOMY

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1. Policy Context

National Planning Policy for Waste

1.1 A waste strategy for England was published in December 2021, “Waste Management Plan for England”. The strategy sets out the Government’s ambition to work towards a more sustainable and efficient approach to resource use and management. The strategy provides an analysis of the waste management situation in England. All local planning authorities should have regard to the strategy and the national planning policy for waste when discharging their responsibilities for waste management.

1.2 The National Planning Policy for Waste (NPPW) was published in October 2014, superseding PPS10 and sets out policies on:

- the use of best available data and robust analysis to underpin a proportionate evidence base;
- the requirement to establish the need for waste management facilities;
- the requirement to identify suitable sites and areas to meet the need in local plans;
- the determination of waste planning applications; and
- monitoring and reporting.

National Planning Policy Framework

1.3 Achieving sustainable development is at the core of the National Planning Policy Framework (NPPF) which includes an environmental objective which (amongst others) seeks to use natural resources prudently and minimise waste and pollution. The NPPF also sets out that Plans should set out strategic policies for waste management infrastructure. Further, the NPPF makes provisions with regards to secondary and recycled materials and minerals waste, as well as promoting resource efficiency.

London Plan

1.4 The London Plan sets out a framework for waste management in London which starts from the position that the best approach is to reduce the amount of waste that arises in the first place. Where this is not possible, the Plan supports an approach based on the waste hierarchy, the last and least desirable option being disposal.



Figure 1: Waste Hierachy

1.5 Policy S1 7 of the London Plan ‘Reducing waste and supporting the circular economy’ seeks to conserve resources, increase the reuse and recycling of materials and reduce waste being sent for disposal through collaborative working between the Mayor, waste planning authorities and industry.

1.6 Policy S1 8 ‘Waste capacity and net waste self-sufficiency’ seeks to manage London’s waste sustainably so that the equivalent of 100% of London’s waste is managed within London (net self-sufficiency) by 2026. This policy only applies to London’s ‘household, commercial and industrial waste’ and includes revised waste apportionment targets for each borough for 2021 and 2041. The City of London is forecast to produce 238,000 tonnes of household, commercial and industrial waste by 2041.

1.7 Policy SI 9 ‘Safeguarded Waste Sites’ safeguards existing waste sites and encourages them to be retained in waste management use.

City of London Corporate Policy

1.8 The City Corporation commissioned the Waste Arisings and Waste Management Capacity Study Review 2016 to inform and support the preparation of the City's Local Plan documents. The study examined the following topics;

- Existing waste arisings;
- Future waste projections;
- Routes and destinations for waste management; and
- Waste management capacity in the City.

1.9 The study reviewed how the City Corporation manages its waste through co-operation with other authorities and concluded that this was a successful approach which will support policies on waste in future Local Plan documents. The study recommended that the City Corporation continues to consult with the relevant authorities on an ongoing basis who receive strategic amounts of the City's waste and identify any challenges or barriers to continuing with this waste movement and processing in the future.

Policy references: Draft City Plan 2040; VT4 River Transport, CE2 New Waste Management Sites, S17 Thames Policy Area.

1.10 The City of London Waste Strategy (2013-2020) was published in 2014 and is currently under review and due to be completed in 2025. It examines how the City Corporation manages its waste, aims to increase recycling and adopt the waste hierarchy of 'prevention, preparing for re-use, recycling, other recovery and final disposal'. This is in line with the Government's 'zero-waste economy' policy and takes account of recent changes in UK legislation.

2. Background

Waste data

2.1 There are three main categories of waste; 1) Construction, demolition and excavation waste 2) Household, commercial and industrial waste and 3) Hazardous waste. The City Corporation is responsible for collecting, recycling and disposing of 'household, commercial and industrial waste' from households and those businesses which choose to use the City Corporation's services. The other two waste streams are collected and managed by private contractors. In contrast to many local authorities, construction, demolition and excavation waste makes up a large part of the City's waste stream due to the high levels of construction and demolition involved in the commercial property sector. Due to the history and location of the City of London all waste generated within the City is received for treatment or disposal at locations within other Waste Planning Authorities. The level of waste deposits from the City has varied over the period 2015 to 2022 with a peak of 440,000 tonnes in 2015.

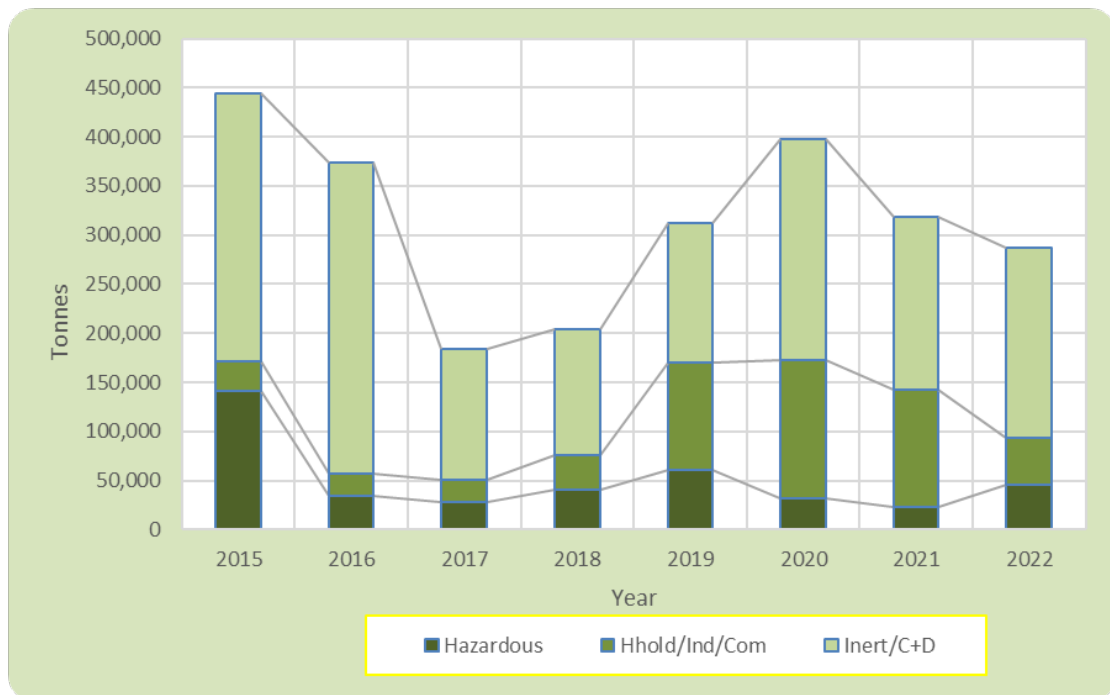


Figure 2: Waste originating in the City of London analysed by type of waste 2015-2022 *Data Source: Environment Agency Waste Data Interrogator*

2.2 Data on waste is extracted from the Environment Agency's 'Waste Data Interrogator'. The Environment Agency provides a range of statistical information annually on the different types and quantities of waste produced for England. Operators of regulated waste management facilities are required to provide the Environment Agency with details of the amount and type of waste they manage. Data from 2022 is the latest available.

2.3 The data during the period 2015-2022 shows slight increases in hazardous and household, commercial and industrial waste generated by the City of London since 2018. However, there is a significant time lag between the publication of data from the Waste Interrogator and the formulation of Local Plan policies on waste. The 2022 Interrogator figures show that construction, demolition and excavation waste and household, commercial and industrial waste have reduced since 2020, due to the implementation of circular economy policies in the Plan which encourage the reuse and recycling of materials. The amount of hazardous waste has increased slightly.

2.4 The three categories of waste are outlined in greater detail below;

Construction, demolition and excavation waste (C,D&E)

This is overall the largest category of waste generated in the City, with the highest level of deposits over the 2015-2022 period going to Merton, with significant deposits made in Surrey and Havering. For the year 2022 significant deposits were made in Havering, Enfield and Essex. These deposits totalled approximately 93,600 tonnes.

The City Corporation has a duty to liaise with the authorities that receive strategic amounts of the City's C,D & E waste (10,000 tonnes or more per annum) to confirm that the authorities are willing to continue to receive such waste from the City of London, as part of the Local Plan review process.

Household, commercial and industrial waste (H,C&I)

Household, commercial and industrial waste generated by the City fell significantly from 2015, before increasing in 2018 which could be due to an increase in commercial waste from increased office development. Since 2020 levels of H,C & I waste have been falling, which may reflect greater levels of recycling in the City. Strategic amounts of H,C&I waste are considered to be 5,000 tonnes per annum and over. All strategic amounts of this waste stream

are sent to Surrey. The City Corporation has agreed a Statement of Common Ground with Surrey to continue receiving the City's H,C& I waste.

Hazardous Waste (HW)

There are two types of hazardous waste recorded nationally, toxic waste such as asbestos and paint, and less toxic waste such as car parts. The less hazardous waste is not included in the Waste Interrogator hazardous figures but is referenced in Local Plan monitoring reports.

Hazardous waste is a much smaller element of the City's waste stream and is sent to six different waste authorities. The vast majority of the City's hazardous waste is sent to Northamptonshire. A strategic amount of hazardous waste is considered to be 100 tonnes or over.

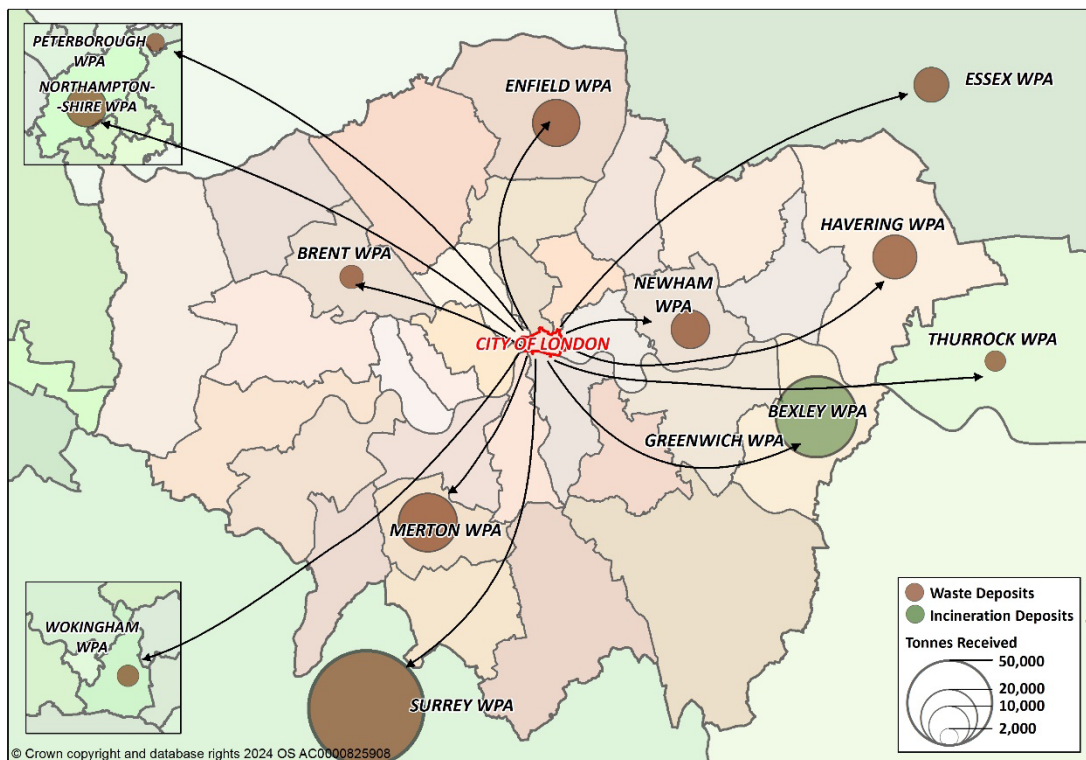


Figure 3: City of London total waste deposits received by Waste Planning Authority 2015-2022 Data Source: Environment Agency Waste Data Interrogator

Waste reduction and recycling

2.5 With no waste treatment plants in the City, the City Corporation relies on Waste Planning Authorities elsewhere to provide such facilities, and therefore it is important for as much waste as possible to be recycled to minimise waste being sent outside the City. By applying circular economy and waste hierarchy principles: designing for durability and modularity, making better use of under-used assets through sharing, reusing products and materials and recycling as much as possible, waste can be designed out and embodied carbon retained. This approach will reduce waste exports from the City.

2.6 All waste generated in the City from households and street cleansing is taken to Walbrook Wharf transfer station and then by barge to the Belvedere incinerator plant in Bexley. The recycling rate of this waste is just below 30% (2019). This is below the target of 45% set by the City of London Waste Strategy 2020. Walbrook Wharf also processes waste that originates outside the City.

2.7 The City Corporation is only directly responsible for a small portion of the waste generated within its boundaries; it is not directly responsible for the waste and recycling generated by the City's businesses. The City Corporation transferred the commercial/business waste and recycling services previously provided directly to our waste collection contractor. They provide a refuse and commingled recycling service to a range of commercial premises in the City via a range of container sizes and single use sacks. These waste streams are currently managed in the same ways as the household waste. The contractor is one of many private waste collection contractors that operate in the City. Engagement with City businesses on waste related issues is therefore key to reducing the overall impact of the waste generated in the City.

2.8 Since the City consists of predominantly businesses, the City Corporation operate a range of initiatives and award schemes that engage with City businesses to encourage and reward excellence in specific areas. Initiatives include the Clean City Awards Scheme, the Sustainable City Awards and the Considerate Contractor Scheme.

2.9 Since 1994 The City Corporation has run the Clean City Award Scheme. During this time, it has engaged with over 1600 City businesses to encourage the responsible management of waste i.e. adherence to waste legislation as well as the encouragement of more sustainable waste management practises such as waste prevention, reuse, recycling and composting. The scheme has an annual awards ceremony where the companies demonstrating the biggest improvements and most innovative methods in reducing their waste are

rewarded. Along with regular best practice meetings, the Clean City Award Scheme has supported its members in their efforts to reduce waste and increase the amount of material recycled within the City.

Policy references: Draft City Plan 2040; S16 Circular Economy and Waste, CE1 Sustainable Waste Facilities and Transport.



Walbrook Wharf Waste Transfer Station

3. Implementation

Waste management capacity

3.1 The Localism Act 2011 places a legal “duty to cooperate” on local planning authorities, county councils in England and public bodies regarding strategic cross boundary matters, such as waste. The London Plan requires the City Corporation, along with London’s boroughs, to contribute towards meeting the Mayor’s target of managing the equivalent of 100% of London’s household and commercial and industrial waste within London by 2041 (net self-sufficiency). As a Waste Planning Authority, the City Corporation is also responsible for co-operating under the duty to co-operate regulations with other waste planning authorities to ensure that there is enough capacity on sites outside the City to manage construction, demolition and excavation waste and hazardous waste originating in the City.

3.2 The London Plan sets a waste apportionment target of 90,000 tonnes for the City of London by 2041, meaning the City Corporation must demonstrate there is sufficient capacity in waste sites outside of the City to accommodate 90,000 tonnes per annum of waste. Evidence shows that, with current technology and economic considerations, there is no viable waste management capacity within the City’s boundary. Walbrook Wharf is the City’s only waste site and is used primarily as a waste transfer facility transporting waste by river to other river served waste management facilities. In an area such as the City, with limited available development land and very high land prices, the availability of a site for additional waste management capacity is highly unlikely, and operation of such a facility likely to be economically unviable. Therefore, the City itself has no actual large-scale waste treatment capacity and therefore relies entirely on cooperation from other waste planning authorities.

3.3 For commercial reasons, a proportion of the City’s waste is likely to continue to be transported to sites outside London. This includes construction, demolition and excavation waste which is not subject to apportionment targets in the London Plan. Annual monitoring of such waste exports using the Environment Agency’s Waste Data Interrogator will inform Duty to Cooperate discussions within and outside London to identify and resolve waste management capacity issues for the City’s waste.

Policy references: Draft City Plan 2040; VT4 River Transport, CE2 New Waste Management Sites, S17 Thames Policy Area.

Partnership working

3.4 The City Corporation is the Waste Planning Authority for the administrative area of the City of London, responsible for planning for all waste originating in the City. This entails co-operation with Waste Planning Authorities elsewhere, since there are no waste treatment plants in the City.

3.5 The City Corporation is a member of, and active participant of, the London Waste Planning Forum which provides a forum for co-operation between waste planning authorities in London and contact with authority representatives beyond London.

3.6 The City Corporation is a member of the South-East London Joint Waste Planning Group (SELJWP) which was originally formed by five London unitary waste planning authorities working together to identify and meet sub-regional requirements for waste management facilities. The initial group consisted of the London boroughs of Bexley, Bromley, Lewisham, Greenwich and Southwark. The City Corporation subsequently joined the group, with Bexley taking responsibility for the City's apportionment.

3.7 London Plan Policy S1 8 encourages boroughs to collaborate by pooling their waste apportionment targets. The SELJWP group has therefore produced a technical paper which demonstrates that through the Group's individual Local Plans, and guidance, sufficient sites have been identified, which, when pooled, collectively meet the London Plan Waste capacity apportionment requirements for the sub-region. The technical paper is regularly updated and the latest version was published by the London Borough of Bexley in 2022 to support the submission of the Bexley Local Plan.

3.8 The London Borough of Bexley has agreed a memorandum of understanding with the City Corporation to use a proportion of Bexley's surplus waste management capacity to ensure that the City of London's waste apportionment requirements can be met. This agreement is monitored on a regular basis. This builds on the sustainable transport links via the River Thames from the City's waste transfer station at Walbrook Wharf to the Riverside Resource Recovery energy from waste facility in Belvedere. The South-East London Joint Waste Planning Group's technical paper includes details of this arrangement.

Policy references: Draft City Plan 2040; S16 Circular Economy and Waste.

Safeguarded Wharf

3.9 The City of London maintains a Waste Transfer Station at Walbrook Wharf operated by Cory Environmental Ltd which only processes household and commercial waste and street cleansing waste.

3.10 The City's policy is to safeguard Walbrook Wharf as a waste handling site and river wharf alongside the Waste Transfer Station. Walbrook Wharf is the only waste transfer station in the City of London and has no capacity for waste management. Therefore, waste management capacity in the City remains at zero tonnes per annum.

3.11 The City of London Waste Arising and Waste Management Capacity Study Review 2016 concluded that new waste management facilities are unlikely to be commercially viable in the City. The City of London is required by the London Plan to allocate enough land and identify waste management facilities to provide capacity to manage 84,000 tonnes of waste annually until 2021 and 90,000 tonnes per annum in 2041. Walbrook Wharf is permitted to transfer 110,000 tpa, but is limited to 85,000 tpa for safety reasons. It occupies a footprint of 0.66ha As a waste transfer station Walbrook Wharf does not count towards the City's waste apportionment under the London Plan definition, as it does not manage waste, therefore co-operation with other Waste Planning Authorities is essential.

Policy references: Draft City Plan 2040; VT4 River Transport, CE2 New Waste Management Sites, S17 Thames Policy Area.

4. Circular Economy

Transition to a Zero Waste City

4.1 The City of London Waste Arisings and Waste Management Capacity Study Report 2016 and the Local Plan Monitoring Report on Waste show that a high proportion of waste generated in the City originates from demolition and construction works.

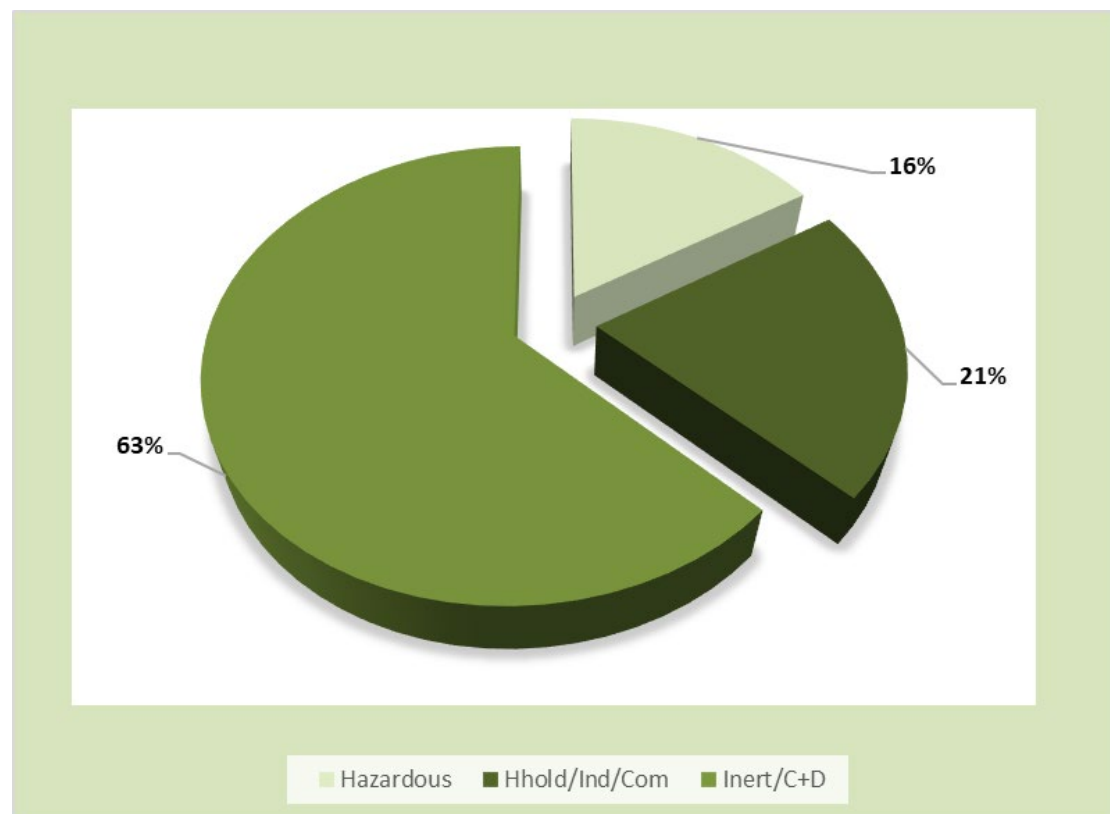


Figure 4: **Seven-year average percentage for each type of waste for the period 2015-2022** Data Source: Environment Agency Waste Data Interrogator

4.2 This finding, coupled with the fact that all waste generated in the City is managed at facilities elsewhere, emphasises the need for measures to reduce this waste. Circular economy principles: designing for longevity, adaptability and flexibility, minimising resource use, avoiding waste and designing for disassembly, will assist in achieving an overall reduction in waste throughout the life cycle of each building.

4.3 Schemes that are referable to the Mayor will be required to submit a circular economy statement. However, for the City this is a high threshold, therefore it is important to extend this to cover all major development (10,000 m²) in the City for it to be effective. There is support for this approach in the Draft City Plan 2040.

Policy references: Draft City Plan 2040; S16 Circular Economy and Waste, CE1 Sustainable Waste Facilities and Transport, S8 Design.

4.4 The City Corporation approved Sustainability Supplementary Planning Guidance in 2023 which aims to transition the City of London to a truly circular organisation that can influence its residents and businesses to adopt circular practices and reduce the amount of waste generated.