

City of London Local Plan  
**City Plan 2036**  
Proposed Submission Draft  
Topic Paper 5 – WASTE AND  
CIRCULAR ECONOMY

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# 1. Policy Context

## National Planning Policy for Waste

1.1 A resources and waste strategy for England was published in December 2018, “Our Waste, Our Resources: A Strategy for England”. The strategy is the first comprehensive update of the Waste Management Plan (WMP) for England 2013 and 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 states 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 Mayor of London has prepared a revised London Plan which was published on 2nd March 2021. The London Plan is the spatial development strategy for Greater London including City of London. The purpose of this plan is to establish strategic development policies for London, clarifying the extent and location of development and providing a framework for public and private agencies in their investment decisions relating to land use.

1.5 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

1.6 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. Policy SI 7 requires referable applications to submit a Circular Economy Statement showing how they will promote circular economy outcomes and aim to be net zero-waste.

1.7 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.

1.8 Policy SI 9 ‘Safeguarded waste sites’ safeguards existing waste sites and requires them to be retained in waste management use unless appropriate compensatory capacity is made within London.

1.9 Policy SI 15 ‘Water transport’ safeguards a network of wharves for waterborne freight-handling use, including consolidation centres. The redevelopment of safeguarded wharves for other land uses should only be accepted if the wharf is no longer viable or capable of being made viable for waterborne freight-handling.

### **City of London Corporate Policy**

1.10 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;
- Waste management capacity in the City; and
- Analysis of options for compliance with the EU Waste Framework Directive.

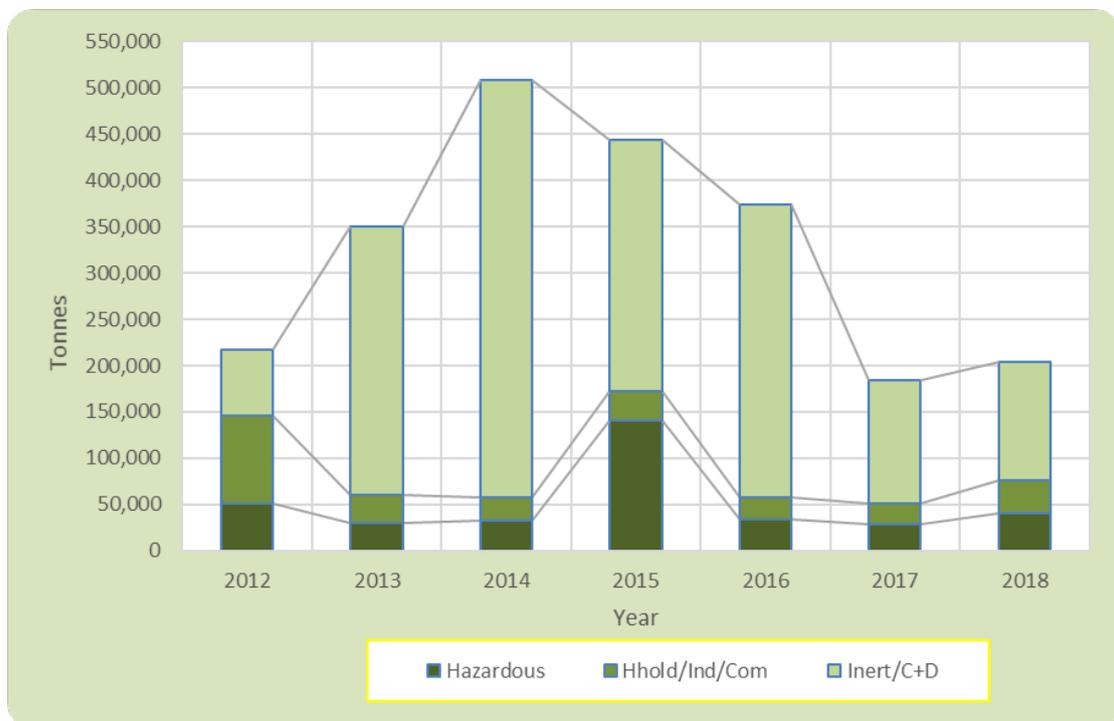
1.11 The study reviewed how the City Corporation manages its waste through co-operation with other authorities and concluded that this was a successful approach which will support policies on waste in future Local Plan documents. The study recommended that the City Corporation continues to consult with the relevant authorities on an ongoing basis which 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. This report will be reviewed every five years.

1.12 The City of London Waste Strategy (2013-2020) was published in 2014 and is currently under review. 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 character 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 (WPAs). The level of waste deposits from the City has varied over the period 2012 to 2018, rising to a peak of 500,000 tonnes in 2014 but declining in more recent years.



**Figure 2: Waste originating in the City of London analysed by type of waste 2012-2018**  
*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 2018 is the latest available.

2.3 The three categories of waste are outlined in greater detail below:

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

2.4 This type of waste stream is dictated by development activity and was the prime contributor to waste deposits from the City of London over the period 2012 to 2018. Levels of C,D&E waste can fluctuate significantly on an annual basis and there have been variances between 71,000 tonnes in 2012 and 450,000 tonnes in 2014. In total 128,000 tonnes of C,D&E waste was exported from the City in 2018.

2.5 Between 2012 and 2018 the highest level of C,D&E waste deposits went to Newham, with significant deposits also made in Thurrock and Barking and Dagenham. For the year 2018 significant deposits were made in Surrey with lower levels of deposits in Brent, Merton, Havering and Thurrock.

2.6 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 City Corporation has actively engaged with WPAs that receive strategic amounts of the City of London’s C,D&E waste (defined as 10,000 tonnes or more per annum by the South East Waste Planning Advisory Group) to confirm that the authorities are willing to continue to receive such waste from the City of London. Statements of Common Ground have been agreed with Surrey, Brent and Merton, while Havering has indicated that they will agree a Statement of Common Ground with the City Corporation.

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

2.7 There was a significant decrease in levels of H,C&I waste generated by the City between 2012 and 2013, with levels relatively low and consistent since 2013. However, the 2018 reporting year saw a slight increase to 35,000 tonnes, which is similar to 2013 levels and may reflect an increase in the City’s office stock.

2.8 Strategic amounts of H,C&I waste are defined as 5,000 or more tonnes per annum by the South East Waste Planning Advisory Group. The only WPA that received H,C&I waste above this threshold from the City of London in 2018 was Surrey. The City Corporation has agreed a Statement of Common Ground with Surrey County Council to continue receiving the City's H,C&I waste.

### **Hazardous Waste (HW)**

2.9 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 waste figures but is referenced in Local Plan monitoring reports. The hazardous waste referenced in this paper refers to the more hazardous waste only, which explains why Figure 3 shows Northamptonshire as the largest recipient of waste from the City, as it includes both types of hazardous waste.

2.10 Hazardous waste generated by the City of London has been at a relatively consistent low level over the period 2012 to 2018, except for a significant peak in 2015. However, the reporting year figure for 2018 saw a slight increase from 2017 to 40,000 tonnes. Hazardous waste is exported from the City to a wide range of WPAs in generally small total amounts. Strategic amounts of hazardous waste are considered to be 100 tonnes or more per annum by the South East Waste Planning Advisory Group.

2.11 Essex, Havering and Bexley have stated they will agree a Statement of Common Ground with the City Corporation. Newham, Walsall and Kent have indicated that they do not feel the need to agree a Statement of Common Ground with the City Corporation as the hazardous waste exports involved are relatively minor. The Waste Statement of Common Ground report will be included in the evidence base for the Proposed Submission Draft Plan 2036.

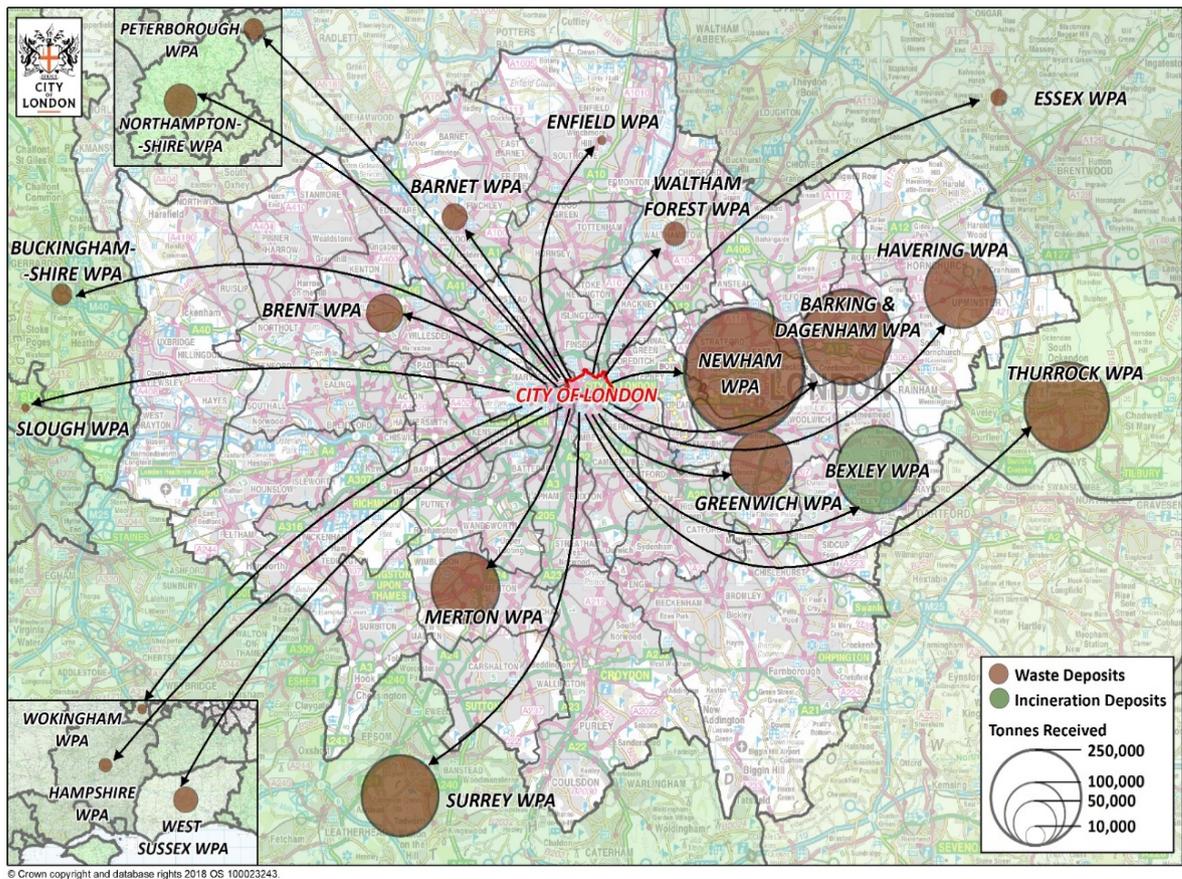


Figure 3: City of London total waste deposits received by WPAs 2012-2018  
 Data Source: Environment Agency Waste Data Interrogator

## Waste reduction and recycling

2.12 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 such as 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.

2.13 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

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Strategy 2013-2020. Walbrook Wharf also processes waste that originates outside the City.

2.14 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 a waste collection contractor, currently operated by Veolia. 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 City's 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.

2.15 The City Corporation operates 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.

2.16 The Clean City Awards Scheme was established in 1994 and since then the City Corporation has engaged with approximately 1,600 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 Awards Scheme has supported its members in their efforts to reduce waste and increase the amount of material recycled within the City.

## 3. Implementation

### Waste management capacity

3.1 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 2026 (net self-sufficiency). As a Waste Planning Authority, the City Corporation is also responsible for co-operating under the duty to co-operate with other WPAs 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 84,000 tonnes (H,C&I waste) for the City of London in 2021, rising to 90,000 tonnes in 2041. This represents a 1.0% share of London's total waste and is higher than the amount of H,C&I waste generated in the City of London in recent years. The City Corporation is therefore required to demonstrate that there is sufficient capacity in waste sites outside of the City to accommodate 84,000 tonnes per annum of waste.

3.3 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 relies entirely on cooperation with other WPAs.

3.4 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:** Proposed Submission Draft City Plan 2036 Policy VT4: River Transport, Policy CE3: New Waste Management Sites and Strategic Policy S17: Thames Policy Area.

## **Partnership working**

3.5 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. As outlined above, this entails co-operation with WPAs elsewhere since there are no waste treatment plants in the City.

3.6 The City of London is a member of the London Waste Planning Forum, which provides a forum for co-operation between WPAs in London and contact with WPA representatives beyond London where data is shared and policies discussed. It is a key element of delivering the duty to cooperate and active participation by City Corporation officers shows a commitment to joint working.

3.7 In addition, the City Corporation is a member of the South-East London Joint Waste Planning Group, 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.

3.8 The London Borough of Bexley has therefore 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 builds on the sustainable transport links between the two WPAs 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. A Statement of Common Ground is being prepared between Bexley and the City Corporation regarding this waste stream.

3.9 London Plan Policy SI 8 encourages boroughs to collaborate by pooling their waste apportionment targets. The South-East London Joint Waste Planning Group has therefore produced a technical paper which demonstrates that through the Group's individual DPDs, 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 Southwark in December 2019 to support the submission of the New Southwark Plan. An updated version will be published later this year to support the Proposed Submission Draft City Plan 2036 and included in the evidence base.

**Policy references:** Proposed Submission Draft City Plan 2036 Strategic Policy S16: Circular Economy and Waste.

### **Safeguarded wharf**

3.10 The City Corporation maintains a Waste Transfer Station at Walbrook Wharf operated by Cory Environmental Ltd which only processes household and commercial waste and street cleansing waste. Walbrook Wharf is permitted to transfer 110,000 tonnes per annum, but is limited to 85,000 tonnes per annum for safety reasons. It occupies a footprint of 0.66 ha.

3.11 The City's policy is to safeguard Walbrook Wharf as a waste handling site and river wharf alongside the Waste Transfer Station, in accordance with London Plan Policies SI 9 and SI 15 and the Safeguarded Wharves Directions issued by the Secretary of State for Housing, Communities and Local Government. 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 WPAs is essential.

3.12 A 2009 report 'Waste Management Capacity in the City of London' examined the provision of waste treatment capacity within the City of London, and the options for developing new capacity. The study concluded that to deal with ca. 100,000 tonnes of waste per year, using technologies such as sorting, composting or energy recovery, a land use of 2ha would be required. In an area with limited development land and very high land prices, the availability of such a site is highly unlikely.

3.13 The conclusions of the 2009 report were reviewed in the 'City of London Waste Arisings and Waste Management Capacity Study Review' in 2016. This report confirmed that it is likely that the space and infrastructure available at Walbrook Wharf is insufficient to accommodate a suitably sized residual waste treatment facility, and engineering modification required for such a facility would be substantial. While smaller scale anaerobic digestion or MRF

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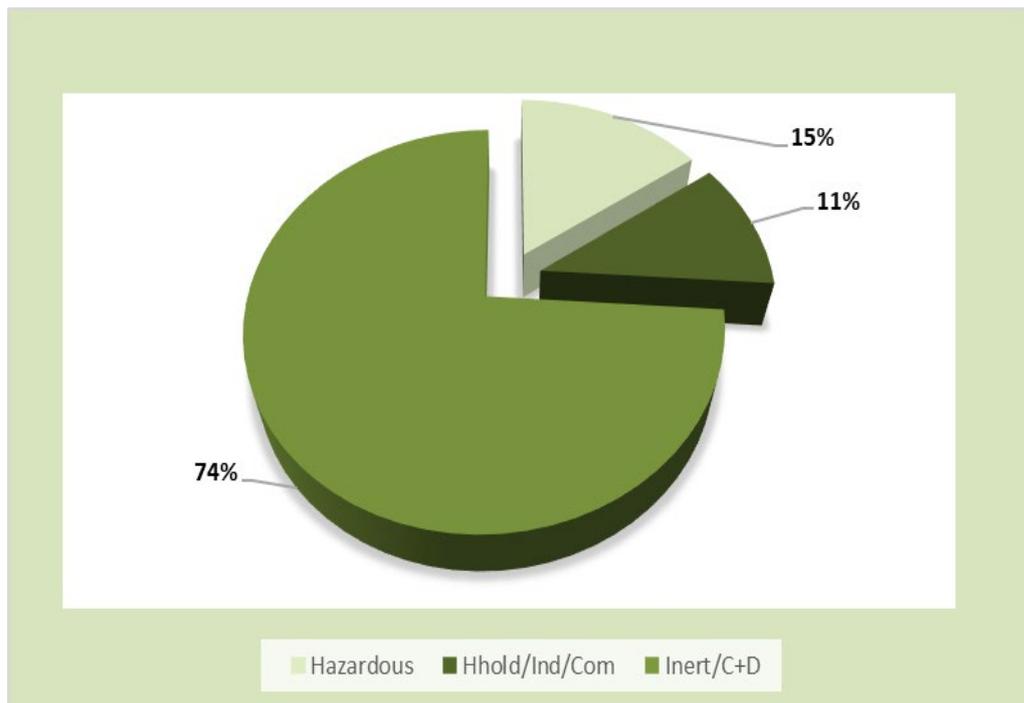
may be feasible, in light of the capacity already operational within London such smaller scale facilities are unlikely to be financially viable from an operational cost and gate fee viewpoint.

**Policy references:** Proposed Submission Draft City Plan 2036 Policy VT4: River Transport, Strategic Policy S16: Circular Economy and Waste, Policy CE3: New Waste Management Sites and Strategic Policy S17: Thames Policy Area.

## 4. Circular Economy

### Transition to a Zero Waste City

4.1 The Local Plan Monitoring Reports on Waste show that almost three-quarters of the waste generated in the City of London between 2012 and 2018 originated from demolition, construction and excavation works.



**Figure 4: Average percentage for each type of waste for the period 2012-2018**  
*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 such as designing for longevity, adaptability and flexibility, minimise 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 Development proposals that are referable to the Mayor will be required to submit a Circular Economy Statement. However, for the City of London this is a high threshold, therefore to be effective in reducing the amount of C,D&E waste generated in the City the Proposed Submission Draft City Plan has extended this requirement to apply to all major development (defined as

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residential development of 10 or more dwellings and other development of 1,000 m<sup>2</sup> gross or more floorspace). Applicants will therefore be required to submit Circular Economy Statements following the London Plan guidance for all major development. The Integrated Impact Assessment found this policy would be positive on social, environmental and economic grounds.

**Policy references:** Proposed Submission Draft City Plan 2036 Strategic Policy S16: Circular Economy and Waste, Policy CE1: Zero Waste City and Strategic Policy S8: Design.