

M68 Written Statement from Just Space 2718

Waste and Circular Economy

The Mayor responded to the Panel's Preliminary Question PQ14 relating to waste management on Friday 7 September 2018.

M68. Would Policy SI7 provide a justified and effective approach to reducing waste and supporting the circular economy? Would it further the aims of Good Growth policies GG1-GG6? Would it focus on planning matters of London wide importance?

The Mayor has advanced a policy of high aspirations and challenging targets without a commensurate elaboration of the meaning and consequences of the terms and objectives used. As set out in Just Space's March 2018 response to the public consultation, a wider understanding of the circular economy needs to be further developed and integrated into policy and practice. Generally, it fails to operationalise its requirements in a manner that furthers the plan's vision, 'A London for All Londoners', and the objectives, the Good Growth policies.

In particular:

a) Would the definition of 'circular economy' as set out in paragraph 9.7.1 be justified and would it be effective in reducing waste, increasing material reuse and recycling and reductions in waste going for disposal?

It is presently pitched and defined as an economic model, but whilst this may offer attractions to businesses and those promoting economic growth, this will not achieve its full potential. Broadening its scope of application, easing the transition, and understanding and communicating the practicalities were all the subject of a route map to a more sharing, diversified, lower carbon intensity lifestyle and economy - 'A Green and Localised Economy' as set out in the Just Space March 2018 response.

To make the policy more effective, the plan needs to explain and illustrate the principles and mechanisms of a 'circular economy', together with quantitative and qualitative targets and measures that go beyond crude volume or percentages. Such targets should be realistic and time based. How materials are being retained and reused, what constitutes minimal residual waste and how these can be monitored should be presented.

There are other ingredients to a Circular Economy. "Practices in many countries indicate that public participation is indispensable to development of a Circular Economy¹." "Profitability is often not the key barrier to implement or scale-up a circular economy business opportunity. Rather it is unintended consequences of existing regulations, social factors such as a lack of experience among companies and policymakers to detect and capture circular economy opportunities, and market failures such as imperfect information and unaccounted externalities that need to be addressed²". These considerations are not apparently recognised by the simplicity enshrined in Policy SI7. Perhaps, this is not possible given that a transition to a Circular economy should involve many aspects of an urban strategy as illustrated in

¹ [Putting a circular economy into practice in China Feng Zhijun & Yan Nailing 2007](#)

² [Ellen Macarthur Foundation case-study on Netherlands Government Green Deal](#)

‘A Green and Localised Economy’. A better plan for ‘All Londoners’ would have embedded, among many other enlightened and progressive ideas, a broader conception of a Circular Economy throughout.

b) Would Policy SI7 provide an effective and justified strategic framework for the preparation of local plans and neighbourhood plans in relation to this matter? In particular what is the justification for the waste to landfill and recycling targets set out in Policy SI7A4? Could these be effectively monitored? Bearing in mind the timescales involved would these be effective?

Policy SI 7 does not provide a strategic framework for local and neighbourhood plans. Plan-makers would have to refer to Policies SI8 and SI9 for some indications of what would be required in land use and site allocations.

As for the targets, these are very challenging and the municipal waste recycling target of 65% by 2030 is higher than the EU’s proposed 2030 target of 60%. This is “against London’s current [household] performance of 33%, albeit with some three-quarters of boroughs showing improvements in recycling performance over the previous year. Is the London Plan’s 2030 target realistic? The International Recycling Rate Comparison Project commissioned by LWARB and the GLA in 2016³ suggests that of the 35 cities studied, one (Melbourne) achieves a household waste recycling rate of over 50%, and a bare handful hit municipal waste recycling rates of over 50%. The London Assembly Environment Committee’s report Household Recycling (December 2017)⁴ presents Milan as an exemplar for London, but this comparison is hardly fair – London’s population of 8.7 million dwarfs that of Milan which has a population of 1.4 million (roughly the size of Birmingham). And, London’s citizenry is much more diverse and lives in a denser housing stock than Milan”⁵.

Nevertheless, there is a pressing need to recycle more and the London Environmental Strategy sets out some changes to existing delivery mechanisms, such as a greater focus on collection from flats, more food waste collections, increased consistency and systematic collection of the main recycling streams, and the Mayor’s power of direction. The challenge here is for behaviour change with people changing their attitudes and recycling more. This lies beyond the bounds of plan-making. However, the requiring of appropriate space and other facilities in developments is something that Local Plans and Neighbourhood Plans can attend to. The Mayoral Old Oak & Park Royal Development Corporation (OPDC) has recently consulted on a draft Supplementary Planning Document ‘Waste

³ <https://www.lwarb.gov.uk/wp-content/uploads/2016/09/LWARB-International-recycling-rate-comparison.pdf>

⁴ [The London Assembly Environment Committee’s report Household Recycling \(December 2017\)](#)

⁵ [The challenge of improving recycling in London, 13 March 2018 by Gev Eduljee, Resource Futures](#)

Management in High Density Development⁶, and this sets out how waste management should be considered in the design and management of high density developments to ensure proposals support recycling targets. It is supported by a technical study. Whilst there may be concerns around the cost and effectiveness of the solutions posed, they are instructive on how plan-makers should go about ensuring that development facilitates the achievement of recycling targets.

As the 65%/95% targets require a collaborative effort by boroughs, waste authorities and the Mayor with all Londoners, as well as efficient waste management infrastructure and Policy SI7 has no reference to the current state of operational facilities and their monitoring, plan-makers must look elsewhere. Efficient and cost-effective facilities that maximise the meeting of targets must be balanced against wider community needs on amenity and environmental protection. Often it is those most disadvantaged who live in proximity to such facilities. The availability of suitable sites and facilities has a determining bearing up on the achievement of targets. And more can be said on this under Matter M69 for Policies SI 8 & SI 9.

c) Would it provide an effective framework for development management? In particular, would the requirement for a Circular Economy Statement in relation to referable applications be effective and justified?

Policy SI 7 does not provide an effective framework for development management. There needs to be available guidance on several of the aspects of this Policy, of which only one is promised in para 9.7.6. And Just Space has only come across the draft SPD by the OPDC as a possible model for another aspect.

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