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**Place and Economy
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Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
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BY EMAIL ONLY

Dear Sir,

THE LONDON PLAN 2019 – 2041

Cambridgeshire County Council wishes to make the following representation to the draft London Plan (December 2017):

Historically Cambridgeshire has received waste from London to be sent to landfill. The currently adopted London Plan assumes that household and commercial & industrial waste exports to the East of England will continue but reduce over the period to 2026, after which such exports will cease.

This strategy is carried forward in the draft London Plan which contains ambitious waste management targets. In particular Policy S18 includes: net self sufficiency in all waste streams and zero biodegradable waste to landfill by 2026, and recycling of 95% of construction, demolition and excavation waste by 2020. It also promotes the values of the circular economy. This policy and the targets within it are strongly supported; but it is vital that the London Plan should also set out a clear approach to the implementation and monitoring of these targets, and this is currently lacking. This needs to be addressed as a priority, as without such a framework Policy S18 will remain an aspiration.

Also, whilst the emerging Plan reflects the reduction and cessation of the export of household & industrial waste; it is not as clear about the export of Construction, Demolition and Excavation (CD&E) waste. Given the large number of construction and infrastructure projects which are ongoing and planned in London, the Plan needs to be explicit about how such waste will be managed over the Plan period. Equally, whilst Policy S18 includes a challenging target to recycle such material (which is supported), how the remaining CD&E will be managed needs to be specifically addressed. The Plan should ensure that sufficient sites to deliver this level of recycling are secured, if

necessary through allocations and also through the safeguarding of existing inert recycling facilities.

Notwithstanding the above, Paragraph 9.7.5 does acknowledge that where waste is to be exported to landfill outside of London that it will be important to show that the receiving authority has the capacity to deal with waste over the lifetime of the development. This is essential in light of the limited landfill capacity surrounding London; and should include consideration of both inert and non-hazardous landfill capacity.

The safeguarding of existing waste management facilities as described in Policy S19 is supported. However, it is evident that such sites are susceptible to being redeveloped to more valuable uses. A more robust delivery of this policy in the future is required; and monitoring of this policy should be undertaken.

Yours sincerely

Sass Pledger
Assistant Director Environment & Commercial
Cambridgeshire County Council