

The London Plan:

Response to the consultation



Who we are

Cory Riverside Energy's (hereafter Cory) business has been serving London through the generations for more than a hundred years, doing its part in solving the city's waste and energy challenges. Today, working closely with local authorities, Cory manage over 1 million tonnes of London's waste and aggregates. Our use of the river Thames to carry residual waste and aggregates avoids some 100,000 truck movements a year on London roads – with commensurate secondary benefits in congestion relief, less road maintenance and improved safety, as well as more obvious primary savings in reducing exposure to air pollutants and lower carbon footprint^{1,2}.

Our Riverside facility in Belvedere, exports enough baseload electricity to power the equivalent of 160,000 homes per year (equivalent to the Borough of Croydon). Up to 250,000 tonnes per year of our bottom ash is recycled into construction material, thus avoiding the need for mining virgin aggregates. Cory's mission is to generate an energy efficient economy for London from London's waste: providing safe, secure, affordable and sustainable supplies of energy and construction materials from renewable sources.

To learn more about our business please see the link to the videos on our website [here](#)

Our commitment to help deliver the London Plan

For our part, Cory would like to reiterate our long-term commitment to work alongside the London authorities, in implementing the ambitious aims of the new draft London Plan. We wish to commend The Mayor's office on the depth and breadth of the London Plan, which addresses a range of issues across housing, waste, air quality, sustainable infrastructure, climate change mitigation and the circular economy in a holistic way.

Nevertheless, to achieve success and to be resilient in the face of future risks and challenges, we believe the wide-ranging plans on waste in particular, need strengthening. We invite you to read our response in detail and would welcome the opportunity to give verbal evidence in support of our submission. Please feel free to pass this message on to the wider GLA team.

¹ Department for Transport. 2017. *Freight carbon review: Moving Britain ahead*. See [here](#)

² The Port of London Authority. 2016. *Vision for the Thames 2035*. See [here](#)

Summary of response

We focus our response on the most important policies for the waste management sector in the London Plan (hereafter LP). Our response is structured as follows:

- a statement of either support urging caution or objection to specific policies;
- an explanation of Cory’s position including relevant evidence; and
- recommended wording changes to ensure policy effectiveness.

The summary table below is included for the ease of your reference, with detailed evidence starting on page 7.

Wording convention applied throughout response:

~~Strikethrough~~ = wording deletion

Bold = additional wording proposed to existing policy

Bold and underline = new point to include in policy

Policy	Support/urge caution/object	Explanation and recommendation	Section	Recommended amendments
Policy SI3 Energy Infrastructure	Support	The onus is on the Mayor to include a positive policy framework within the LP to encourage heat uptake from EfW facilities. Additionally, funding for district heating networks will be required. Consultation with industry on the GLA’s Energy Planning Guidance ³ is recommended.	B4	“possible opportunities for energy from waste”
Policy SI7 Reducing waste and supporting the circular economy	Urge caution	Cory recommend that the GLA should repeat the entire waste arisings forecast review, conducted by SLR. As currently presented it is not sound. This matter is expanded on in our response.	SI7 A SI7 A	“Waste reduction, increases in material re-use and recycling; and reductions in waste going for disposal will be achieved by the Mayor, Boroughs and industry working in collaboration to: ” Insert additional point: <u>“Encouraging better material selection and secondary material use in new products”</u>

³ GLA. Energy Planning Guidance. See [here](#)

<p>Policy SI8 Waste capacity and net waste self-sufficiency</p>	<p>Urge caution</p>	<p>National planning policy guidance is clear that development plans such as the LP should remain technology neutral. The current wording is implicitly biased toward anaerobic digestion, and fails to consider that conventional EfW, alongside other technologies is a key element of the Circular Economy, contributing towards renewable energy generation.</p> <p>Unless the Plan actively delivers additional EfW capacity within London, then the production of RDF/SRF in London is likely be destined for export, with the benefits of energy and materials recovery realised elsewhere, directly contradicting the stated aim of Policy SI8 (i.e. net self-sufficiency).</p>	<p>SI8 A</p> <p>SI8 A</p> <p>SI8 B</p> <p>SI8 C3</p> <p>SI8 C3</p> <p>Section 9.8.5.</p>	<p><i>“the equivalent of 100 per cent of London’s waste should be managed within London (i.e. net self-sufficiency) by 2026, through the delivery of additional recycling and residual waste treatment capacity”</i></p> <p><i>“new waste management sites should be provided where required to help address London’s waste capacity shortfall”</i></p> <p>Insert additional point: <u>“identify additional land for waste treatment facilities and which enables contingency to be factored into the stated apportionment figures”</u></p> <p>Contribute towards renewable energy generation, especially renewable gas technologies from organic/biomass waste</p> <p>Replace with: Utilise waste as a resource to generate renewable, baseload energy, through a range of appropriate energy from waste technologies</p> <p>Supporting the production of SRF and high quality RDF feedstock will promote local energy generation and benefit Londoners, improving London’s energy security, helping to achieve regional self-sufficiency and possibly reducing leakage of SRF and RDF overseas. London facilities should produce high-quality waste feedstock with very little recyclable content (i.e. plastics), supporting renewable energy generation.</p>
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<p>Policy SI15 Water transport</p>	<p>Support</p>	<p>We commend the approach taken in the LP to safeguard and expand the use of waterborne freight. The challenge in achieving that modal shift of freight onto the river predominantly rests in the very limited number of operating wharves in central London. We look forward to working closely with TfL on the new steering group for water freight, and aim to willingly and energetically contribute to the knowledge base and growth potential of the use of the River Thames.</p>	<p>SI15 E</p> <p>Safeguarded wharves should only be used 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, demonstrably no longer viable or capable of being made viable for waterborne freight-handling (see viability testing criteria). Temporary uses should only be allowed where they do not preclude the wharf being reused for waterborne freight-handling uses.</p> <p>SI15 I</p> <p>Development proposals close to navigable waterways should maximise water transport for bulk materials during demolition and construction phases, and ensure long-term opportunities for growth and expansion of river freight are considered.</p>
<p>Policy SI9 Safeguarded waste sites</p>	<p>Support</p>		<p>SI9 A</p> <p><i>“existing waste sites should be safeguarded and retained in waste management use, unless a site is already compromised through previous encroachment by sensitive receptors”</i></p>
<p>Policy SI10 Aggregates</p>	<p>Support</p>		<p>SI10 A</p> <p>Insert additional points: <i>“An adequate supply of aggregates to support construction in London will be achieved by:</i></p> <p><i>1) encouraging re-use and recycling of:</i></p> <p><i>- secondary aggregates,</i> <i>- construction, demolition and excavation waste</i> <i>- Incinerator Bottom Ash (IBA) from energy from waste treatment</i></p>

				<u>- aggregates from street sweeping residues</u>
Policy D1 London's form and characteristics	Support		D4 G	<i>"Dwellings should be designed with adequate and easily accessible storage space, both inside and outside the development, that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food and other waste should be considered in the early design stages, to help improve recycling rates, reduce smell, odour and vehicle movements, and improve street scene and community safety".</i>
Chapter 11: Enabling infrastructure, Section 11.1.42	Urge caution	Cory welcome the Mayor's commitment to increase the development of heat network infrastructure in London. We note that policy and actions in the LP are somewhat lacking in this regard. There are duties placed on developers of EfW facilities to provide relevant infrastructure up to the site boundary but little provision in the LP to develop the associated infrastructure beyond that. The onus is on the Mayor to put a positive policy framework in place within the LP to encourage heat uptake from EfW facilities.		

Policy SI3 Energy Infrastructure (Page 329)

Support.

Policy SI3 is positively worded and appears sufficiently robust to achieve the Mayor's ambitious vision on decentralised energy infrastructure development across London.

Policy SI3 is consistent with national policy⁴ in that it recognises the role of waste management infrastructure within communities, providing a potential heat source. Cory welcome explicit acknowledgement – in Policy B4 and Section 9.3.7 – of the positive role energy from waste (EfW) has to play in meeting London's waste management and energy needs. Energy generated from waste will typically be between 40% and 100% renewable and will therefore provide reliable, low carbon base-load power to the UK market⁵. EfW also delivers secondary materials through the recovered metals and aggregates, thus avoiding use of virgin materials and sustaining new markets for secondary materials.

For Policy SI3 to be a success, and enable EfW with combined heat and power (CHP), a joined up and integrated approach to planning, energy and housing policy is required. Only this can realise the great potential to utilise the heat generated at EfW plants, creating a more productive energy system for Londoners, that is lower cost and lower carbon⁶.

Though Policy SI3 outlines a positive policy framework, unless the GLA can help deliver the associated heat network infrastructure and bring the heat to customers in the right place, most EfW plants will remain "CHP ready", but nonetheless operate in electricity-only mode. The Mayor, in conjunction with local authorities needs to be more active in developing and funding opportunities for district heat networks through: co-ordination of opportunities in local planning processes; funding heat mapping projects to aid local planning processes; and if the Mayor is truly serious about connecting EfW plants to heat users, funding for district heating schemes will be required. We suggest that stakeholder consultation on the GLA's Energy Planning Guidance⁷ is sought, to allow industry to share views on how best to ensure that EfW retains an appropriate and equally ambitious role in sustainable infrastructure development throughout London.

Recommended amendments:

The inclusion of the word "possible" in Policy B4 creates unnecessary ambiguity and weakens the policy. Policy B4 should remove the word "possible" and be read as:

"possible opportunities for energy from waste"

⁴ Defra. Energy from waste: a guide to the debate. See [here](#)

⁵ Suez. Mind the gap 2017 – 2030. 2017. See [here](#)

⁶ Association for Decentralised Energy (ADE). Shared Warmth. February 2018. See [here](#)

⁷ GLA. Energy Planning Guidance. See [here](#)

Policy SI7 Reducing waste and supporting the circular economy (Page 344)

Urge caution

Cory consider Policy S17 does not provide a comprehensive approach to waste reduction and therefore is unlikely to succeed.

Policy SI7 sets out the Mayor's approach to waste reduction through promotion of the circular economy and improved recycling performance across London. Policy SI7 is underpinned by evidence on waste arisings forecasts, provided by SLR Consulting Ltd (SLR)⁸. Cory consider Policy SI7 aspirational, and although we are very supportive of aspirations to increase recycling rates, we believe based on the market data we have available to us, that setting a recycling target of 65% across London may be difficult to achieve.

Evidence presented in the North London Heat Power Project (NLHPP) Need Assessment⁹, that was accepted by the Secretary of State, demonstrated that London, along with many other capital cities with dense urban conurbations and transient populations, struggle to meet 50% recycling across municipal waste. Based on this evidence, we believe the proposed rate of 65% recycling – a more than doubling of existing rates – is unrealistic and will lead to unintended consequences for London, by worsening the waste treatment capacity gap. The ability to achieve 65% recycling is not borne out by the reality of London's recycling infrastructure – both existing and planned – and will be extremely challenging without significant new investment in recycling infrastructure (best estimates of £100 – 300 million¹⁰). We further outline our critique of the policy considering both the national and local settings:

National setting

In November 2017, Cory welcomed the publication of the 'UK Residual Waste Market Review 2030', produced by Tolvik Consulting on behalf of the Environmental Services Association (ESA), which called for long-term policy direction from government on the future treatment of residual waste¹¹. The report independently assessed recycling levels, and the potential residual waste 'capacity gap', through analysis of six other industry reports on the topic. Specifically, the ESA study has projected that if recycling trends follow those of the more mature (higher) recycling countries and cities in other parts of Europe, the industry expects the UK will achieve municipal waste recycling rates of around 55% by 2030.

The levels of recycling proposed in the LP exceeds what the waste industry believes possible to deliver for London; exceeds the European Commission circular economy package 2030 targets¹²; and exceeds a raft of other recently published reports, which generally place expected UK recycling rates by 2030 in the 50-55% range^{13, 14}.

Underestimating London's waste volumes

We have real concerns about the soundness of data used to derive London's waste arisings, as presented in Section 9.7.2 of the LP: we consider London's waste arisings are underestimated at 18 million tonnes (Mt). Cory understands that the waste arisings estimates are informed by the SLR London Plan Waste Forecasts and Apportionments background paper (GLA - Task 4). Cory have reviewed the paper and note that only household waste, and commercial and industrial (C&I) waste was included in the assessment and Construction, Demolition & Excavation Waste (CDEW) was excluded (Page 2). The report states that "this approach is in-keeping with the requirements of Planning Policy Statement 10 (PPS10)"¹⁵. It is Cory's

⁸ London Plan. Evidence Base – Waste arisings. See [here](#)

⁹ <http://www.northlondonheatandpower.london/media/1108/interim-need-assessment-phase-2-consultation-issue.pdf>

¹⁰ London Environment Strategy. See [here](#)

¹¹ Environmental Services Association (ESA). UK Residual Waste: 2030 Market Review. See [here](#)

¹² EU Circular Economy Package. See [here](#)

¹³ Biffa. The Reality Gap. 2017. See [here](#)

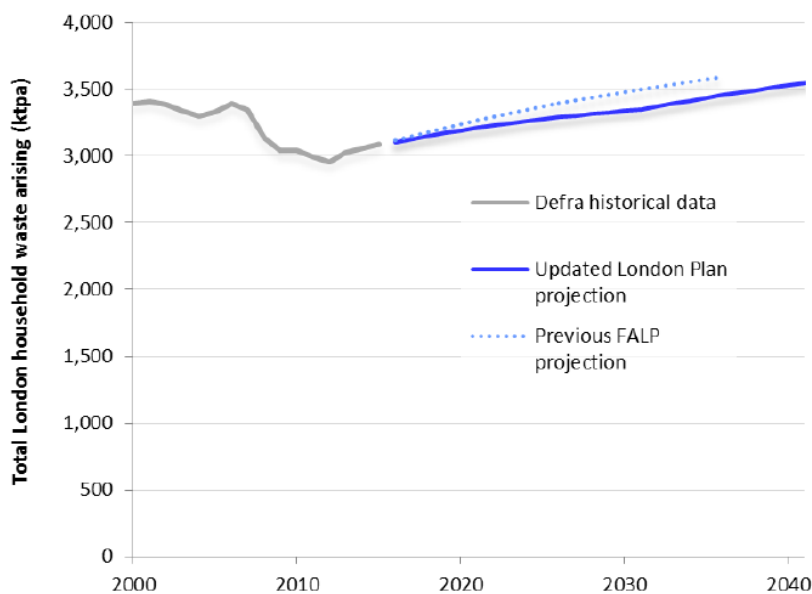
¹⁴ Suez. Mind the gap 2017 – 2030. See [here](#)

¹⁵ SLR Consulting. GLA Task 4 – Updating the apportionment method. See [here](#)

understanding that in 2014, PPS10 was withdrawn as the Government’s national planning policy guidance for waste¹⁶. Therefore, Cory consider the guidance is no longer applicable and was not suitable for use in the SLR assessment. Current national planning practice guidance on waste (ID 28-013-20141016 in the on-line National Planning Practice Guidance¹⁷) makes it clear that waste planning authorities should plan for the sustainable waste management of all relevant waste streams including: municipal and household; commercial and industrial; construction and demolition; low level radioactive; agricultural; hazardous waste; and waste water. In simple terms, current national planning practice guidance on waste requires that statutory land use planning documents – in this case the LP – should take account of all waste streams. The current iteration of the LP does not do this.

Additionally, the document ‘GLA Waste Arisings Review’¹⁸, forming a key part of the LP evidence base, determines baseline waste arisings which are much lower than those previously relied upon by both Defra and previous iterations of the LP. Figure 2 below from the document, outlines the predicted future reduction in waste arisings:

Figure 2 – London’s household waste arisings projections (ktpa)



Source: Task 1 GLA Waste Arisings Model Critical Friend

Under the approach proposed in the ‘GLA Waste Arisings Review’, it is estimated that potential exists to reduce household waste arisings per capita by 6% in 2036. This translates into a 6.2% reduction in household waste arisings in tonnes per annum. These arisings forecasts are substantially lower than those projected in the previous alterations to the LP. The ‘GLA Waste Arisings Review’ refers to ‘Defra outturn data’ whilst not explaining what this is, and where this data has come from. The appropriate reference, and one that would give credible, up to date data, would be ‘WasteDataFlow’¹⁹. Overall, we believe the evidence base used to calculate household waste arisings in the LP is not sound, specifically because:

¹⁶ <https://www.gov.uk/guidance/waste>

¹⁷ Ibid

¹⁸ SLR. Task 1 – GLA Waste Arisings Review. See [here](#)

¹⁹ <http://www.wastedataflow.org/>

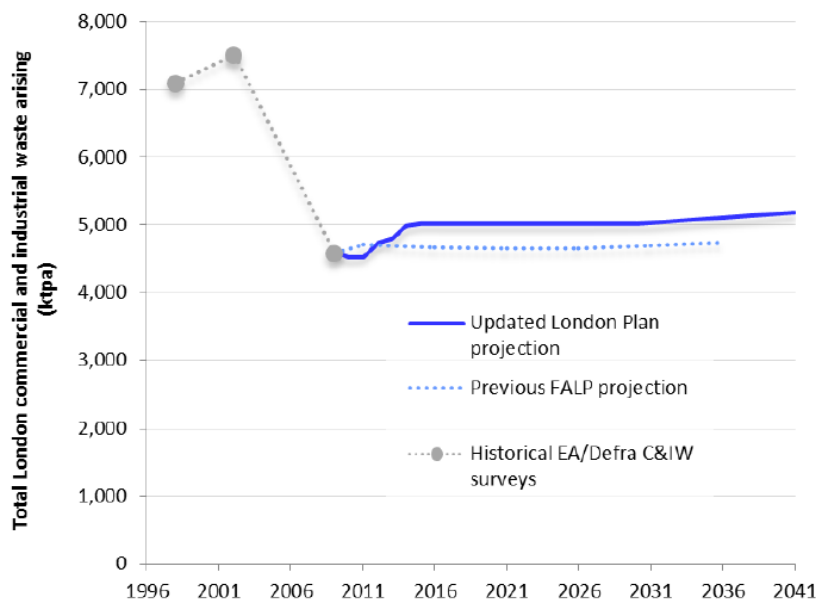
- Out to 2036, a 5% reduction is factored in, to waste generation per person (household waste)²⁰. This 5% reduction is an optimistic waste/head reduction factor for household waste; and
- There is a lack of transparency over the source of data used.

A clear illustration of the problematic nature of the approach used in the ‘GLA Waste Arisings Review’ can be found in the London Assembly (2017) - ‘Circular Economy in London Report’²¹. This report identified that in 2016, local authorities collected 3.7 million tonnes of waste. This includes an additional 600,000 tonnes of local authority collected waste (LACW) over and above that forecast in the ‘GLA Waste Arising Review’.

Commercial and industrial (C&I) waste arisings

Updated forecasts for C&I waste arisings from the ‘GLA Waste Arisings Review’ are 6.5% lower than the GLA’s existing sectoral approach. In similar fashion to household waste, a 5% reduction is factored in, for waste generation per employee (C&I waste)²².

Figure 3 – London’s industrial waste arisings projections (ktpa)



Source: Task 1 GLA Waste Arisings Model Critical Friend

In the ‘GLA Waste Arisings Review’, C&I tonnages remain based on the 2009 C&I waste survey. A new methodology to estimate C&I waste generation in England, issued in August 2014 is not used. This methodology is seen as the best practice method across waste plan making²³. We believe the use of 2009 C&I waste survey to forecast arisings, which was withdrawn by Defra in 2015, and is now eight years out of date, is not sound.

The reduction in projected C&I waste arisings as identified in the LP, is largely due to the use of Defra’s 2009 survey to characterise baseline waste production. Previous C&I waste forecasts in previous iterations of the London Plan used the Environment Agency’s 2002/3 C&I waste survey as a basis. The EA 2002/3 survey

²⁰ SLR. Task 1 – GLA Waste Arisings Model Critical Friend. See [here](#)

²¹ London Assembly Environment Committee Report: *Waste -The Circular Economy*, September 2017 <https://www.london.gov.uk/about-us/london-assembly/london-assembly-committees/environment-committee>

²² Ibid

²³ Defra. 2014. New generation to estimate waste generation by the Commercial & Industrial sector. [See here](#)

estimated a London’s total C&IW arising of 7.5 Mt, while the more recent Defra 2009 survey found a substantially reduced arising 4.6 Mt (39% lower). The use of Defra 2009 survey to forecast C&I waste generation could (we believe does) result in a significant under representation of the wastes likely to be produced within London. Relevant and consistent with our position on this matter, on 22nd February 2018, Defra produced its latest iteration of waste statistics for the UK, including revisions to the methodology for calculating C&I waste arisings in England²⁴. In it, Defra state that the *“latest methodology has been developed with considerable input from industry experts and sense-checked against alternative data sources. Defra believe the latest estimates to be the most reliable figures that can be reasonably produced with the currently available data”*. This is a formal acknowledgement from Defra that previous C&I arisings forecasts have underestimated the amount of waste out there in England.

Cory believe the waste arisings forecasts underpinning the LP are not fit for purpose. Forecasting less waste in the LP, will not mean that less waste will be produced in reality; it simply means that the Plan does not contain enough provision for the waste infrastructure that is required, will exacerbate the existing capacity gap, and increase dependency on exporting waste outside of London.

Policy SI7: Key recommendation

In order for Policy SI7 to be effective and sufficiently robust, our overall recommendation is that the GLA should repeat the waste arisings forecast review conducted by SLR. A new, updated and fully comprehensive waste arisings review for London should be undertaken that:

- utilises the most recent planning guidance on waste;
- includes full transparency over all data input assumptions used; and
- uses the most up to date C&I data that is available from Defra, in light of revisions to C&I waste arisings in England published in February 2018.

Furthermore, Cory consider it prudent to factor in ‘contingency planning’ within predicted waste arisings. This would not only help ensure sufficient waste treatment capacity is maintained during periods of plant down-time or maintenance, but would also help “future proof” the Borough level apportionments should waste arisings turn out higher than predicted by the LP - which we consider highly likely.

Recommended amendments:

SI7 A	<p><i>“Waste reduction, increases in material re-use and recycling; and reductions in waste going for disposal will be achieved by the Mayor, Boroughs and industry working in collaboration to:”</i></p> <p>Insert additional point: <u>“Encouraging better material selection and secondary material use in new products”</u></p>
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²⁴ Defra. February 2018. Updated UK Waste Statistics. See [here](#)

Policy S18 Waste capacity and net waste self-sufficiency (Page 347)

Urge caution

Policy S18 is positively worded, and sets out the aspiration that London should achieve net self-sufficiency in waste treatment by 2026. Paragraph 9.8.1 gives London a current self-sufficiency ratio of approximately 60 per cent. We wholeheartedly agree with these aspirations but urge caution on certain aspects of Policy S18. Specifically, we have four main concerns:

- net waste self-sufficiency needs complimentary policies across different policy platforms;
- net waste self-sufficiency is not helped by use of apportionment forecasts for London (and the Boroughs') that do not plan for all of London's waste streams;
- policy wording is not technology neutral; and
- the production of RDF/SRF should not count towards net self-sufficiency, if this waste is then treated in EfW facilities abroad.

Net self-sufficiency needs complimentary policies

Policy S18 does not include an overarching strategy that ensures the delivery level of residual waste treatment and recycling infrastructure will be adequate for London to reach net self-sufficiency in waste. Without a raft of complimentary policy measures – such as increased producer responsibility through designing for better recyclability; measures to stimulate demand for recycled materials; and central government funding to support harmonised collection systems – recycling rates are unlikely to rise above current rates. If recycling rates fail to rise (to 65%) as predicted by the LP, there is a substantive risk that Policy S18 will exacerbate problems for London, by increasing the residual waste treatment capacity gap, rather than increasing net self-sufficiency. Cory has submitted evidence to the GLA Environment Committee predicting an EfW capacity gap of 0.9 – 1.7 million tonnes by 2030, assuming a lower (54–60 per cent) recycling rate²⁵.

Borough apportionment forecasts are flawed

The waste apportionment forecast for each Borough in the LP (page 349), gives each Borough an amount of waste to plan for out to 2041. We have previously outlined in our response to Policy S17 that this apportionment method is based on a misinterpretation of planning guidelines, and should be repeated. We believe current forecasts underestimate the volume of London waste that needs to be managed and planned for.

Remaining technology neutral

National planning policy²⁶ is quite clear: in encouraging appropriate waste management development in the right place, development plans should remain technology neutral. Within Policy S18 C3, the Mayor clearly states a preference for the type of waste management facilities desired. The current wording is implicitly biased toward anaerobic digestion and fails to consider that conventional EfW, alongside other technologies is a key element of the Circular Economy, providing an appropriate treatment route for wastes diverted from landfill, and contributing towards renewable energy generation. Anaerobic digestion of food waste is not recycling and should be recognised as generating energy from waste, in exactly the same way that other technologies that process waste into energy are, such as incineration, pyrolysis or gasification.

SRF and RDF

We urge caution on bullet point number two of section 9.8.4 which could be interpreted to infer that the production of RDF/SRF in London is capable of contributing towards net self-sufficiency / Boroughs' apportionment targets. This should not be the case. The production of RDF/SRF for export outside London

²⁵ https://www.london.gov.uk/sites/default/files/waste-energy_from_waste_feb15.pdf

²⁶ <https://www.gov.uk/guidance/waste>

should be considered an intermediate step in the waste treatment process, not contributing to self-sufficiency. Unless the LP actively delivers the development of additional EfW capacity within London, then the production of RDF/SRF is likely be destined for export, with the benefits of energy and materials recovery realised elsewhere on the continent. This contradicts the overarching aim of Policy SI8.

Policy SI8 Section 9.8.5

Given the lack of domestic demand, most RDF and SRF produced in London (and the UK) will be exported to facilities overseas and thus not contribute to London's energy security, as implied in this section.

Policy SI8 Section 9.8.6

In light of our comments above (that the Borough level apportionment figures fall short of the total amount of waste actually produced by London) a shortfall in waste treatment capacity in London can be expected if capacity and land allocations are made in line with the apportioned tonnages within Table 9.2.

Policy SI8: Key recommendation

We wholeheartedly agree with the sentiments that London should achieve net waste self-sufficiency. However, if a target of 65% recycling is not met, Policy SI8 will not prove robust to deal with the increased volumes of residual waste. Far from increasing net self-sufficiency, Policy SI8 may further exacerbate the waste treatment capacity gap London is currently facing, and lock it in for the long-term.

We recommend Policy SI8 goes further than positive aspirations, and explicitly commits to the additional delivery of recycling and residual waste treatment capacity, to address London’s waste capacity shortfall. Furthermore, the production of SRF and RDF should be considered an intermediate step in the waste treatment process, not contributing to London’s self-sufficiency.

Recommended amendments:

SI8 A	<i>“the equivalent of 100 per cent of London’s waste should be managed within London (i.e. net self-sufficiency) by 2026, through the delivery of additional recycling and residual waste treatment capacity”</i>
SI8B	<i>“new waste management sites should be provided where required to help address London's waste capacity shortfall”</i> <i>Insert additional point: <u>“identify additional land for waste treatment facilities and which enables contingency to be factored into the stated apportionment figures”</u></i>
SI8 C3	<i>Contribute towards renewable energy generation, especially renewable gas technologies from organic/biomass waste.</i> <i>Utilise waste as a resource to generate renewable, baseload energy, through a range of appropriate energy from waste technologies</i>

<p>Section 9.8.5.</p>	<p>Supporting the production of SRF and high quality RDF feedstock will promote local energy generation and benefit Londoners, improving London's energy security, helping to achieve regional self-sufficiency and possibly reducing leakage of SRF and RDF overseas. London facilities should produce high-quality waste feedstock with very little recyclable content (i.e. plastics), supporting renewable energy generation.</p>
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Policy SI15 Water transport (Page 368)

Support

Proposing minor amendments

Policy SI15 seeks to ensure and enhance the recognition of water transport as one of the most sustainable modes of freight available to London. We commend and passionately support this policy. The challenge in achieving that modal shift of freight onto the river predominantly rests in the very limited number of operating wharves in central London. We consider existing wharves need to be protected, and those wharves under threat from development should always require the wharf use to be retained, with the developer required/ encouraged/ incentivised to utilise only the air rights.

Recommended amendments:

<p>SI15 E</p>	<p>Safeguarded wharves should only be used 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, demonstrably no longer viable or capable of being made viable for waterborne freight-handling (see viability testing criteria). Temporary uses should only be allowed where they do not preclude the wharf being reused for waterborne freight-handling uses.</p>
<p>SI15 I</p>	<p>Development proposals close to navigable waterways should maximise water transport for bulk materials during demolition and construction phases, and ensure long-term opportunities for growth and expansion of river freight are considered.</p>

Policy SI9 Safeguarded waste sites (Page 355)

Support

Proposing minor amendments

Policy SI9 seeks to safeguard waste sites, setting out criteria covering their loss to other land uses. Policy SI9 is positively worded and Cory support the sentiments expressed within it. Any loss of overall capacity and capability for waste management and recycling within London, should be offset by increases in capacity elsewhere. We propose minor amendments to the policy wording.

Recommended amendments:

SI9 A	<i>“existing waste sites should be safeguarded and retained in waste management use, unless a site is already compromised through previous encroachment by sensitive receptors”</i>
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Policy SI10 Aggregates (Page 356)

Support

Proposing minor amendments

We recommend the LP should explicitly acknowledge the additional benefits of local solutions that can deliver a circular economy. To help support the Mayor’s ambitions for London to have a low carbon, circular economy we recommend more prominence be given to the contribution of local waste-derived products, including incinerator bottom ash (IBA). This change allows the policy to better recognise (and encourage) a broader range of waste types that can be recycled to produce aggregates for the construction industry, and thus capable of helping to meet the Plan’s aggregates recycling target. The recently published UK recycling rates from Defra now include metals IBA, which has resulted in recycling rates in England rising by 0.7%²⁷

Recommended amendments:

SI10 A	<p><i><u>New point: “An adequate supply of aggregates to support construction in London will be achieved by encouraging re-use and recycling of:</u></i></p> <ul style="list-style-type: none"> <i><u>- secondary aggregates,</u></i> <i><u>- construction, demolition and excavation waste</u></i> <i><u>- Incinerator Bottom Ash (IBA) from energy from waste treatment</u></i> <i><u>- aggregates from street sweeping residues”</u></i>
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²⁷ Recycling Waste World article. February 2018. See [here](#)

Policy D1 London’s form and characteristics (Page 98)

Support

Proposing minor amendments

This policy is key to ensure recycling rates in London are facilitated to improve. We welcome the inclusion of consideration of adequate and easily accessible space for separation and storage of recyclables, food, and residual waste, for new flatted properties. Flatted properties have historically only achieved low rates and across London which is potentially problematic given that an estimated 88% of new builds to 2030 will be flats. Significant efforts and investment will therefore be required in order to substantially increase recycling rates in this dwelling type.

Recommended amendments:

D1	<p><i>“Shared and easily accessible storage space, both inside and outside the development, supporting separate collection of dry recyclables, food waste and other waste should be considered in the early design stages to help improve recycling rates, reduce smell, odour and vehicle movements, and improve street scene and community safety”.</i></p>
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Chapter 11: Enabling infrastructure, Section 11.1.42

Support

Cory welcome the Mayor’s commitment to increase the development of heat network infrastructure in London. We note that policy and actions in the Plan are somewhat lacking in this regard. There are duties placed on developers of EfW facilities to provide relevant infrastructure up to the site boundary but little provision in the Plan to develop the associated infrastructure beyond that. The onus is on the Mayor to put a positive policy framework in place within the London Plan to encourage heat uptake from EfW facilities. Additionally, funding for district heating networks will be required.

Key recommendation

The London Plan should include a clear infrastructure delivery plan for the development of district heating networks, including recommendations for a stable policy framework; and support measures with clear trajectories against a timetable, which The Mayor can be held accountable to deliver.

