

# Environmental Services Association comments

Page: [Policy D1 London's form and characteristics](#)

Section: [3.1.8](#)

ESA suggests a minor amendment to section 3.1.8 (in italic and bold) as follows:

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

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Section: [3.1.10](#)

ESA suggests a re-wording of section 3.1.10 (in bold and italics) as follows:

To minimise the use of new materials ***and promote the circular economy*** the following principles (see also Figure 3.1) should be taken into account at the start of the design process ***and in line with a submitted Circular Economy Statement.***

- building in layers - ensuring that different parts of the building are accessible and can be maintained and replaced where necessary
- designing out waste - ensuring that waste reduction is planned in from project inception to completion, including consideration of standardised components, modular build and re-use of secondary products and materials
- designing for adaptability

- designing for disassembly
- using materials that can be re-used and recycled.

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Section: [3.1.11](#)

Section 3.1.11 should be amended to require large scale development projects to submit a Circular Economy Statement

Page: [Policy D4 Housing quality and standards](#)

Section: [D4](#)

For consistency with earlier policy (D1) ESA suggests that policy D4 (G) is amended to require that new dwellings make adequate space for recyclables and "other wastes" (ie provision for residual wastes).

We therefore recommend a minor amendment (in bold and italics) to policy D4(G) as follows:

Dwellings should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass), food ***waste and other wastes***.

ESA recommends a change to policy A3 (waste management) in bold and italics as follows:

(3) ***deliverable*** secondary materials and waste management **sites and allowing the management of wastes at the appropriate stage on the waste hierarchy (see policy SI8 'waste capacity and net self sufficiency')**

The justification for the suggested change is twofold.

When planning for waste management, local authorities often make provision in their development plan for a bank of industrial sites. However, not all of these sites may be suited for waste management use: low internal clearance within an industrial unit, for example, may not allow for movements of mobile plant or installation of equipment used for waste management activities. Thus our suggested emphasis on "deliverable" waste management sites. When relying on industrial sites for waste management local authorities should ensure there is a robust framework in place to ensure such prove deliverable for waste management use.

Planning authorities need to make provision for a range of waste management sites, which are capable of treating different wastes *throughout* the waste hierarchy. While ESA supports the Mayor's efforts to drive waste up the hierarchy, treatment options beyond recycling will also be needed to deliver sustainable waste management infrastructure. Each activity is merely designed to treat different waste types at the most appropriate place on the waste hierarchy.

ESA supports policy G (of E4).

The Plan correctly notes that sufficient industrial capacity should not be undermined by permitted development rights, which could potentially allow for the conversion of industrial land and sites into residential use. Such an approach would likely increase the value of that land, effectively pricing-out proponents of waste management development, and other industrial users, in seeking to develop that land.

Without moves to counter means of simplifying the conversion of industrial land to residential use the availability of potential land for waste management development is not only reduced, but could also render surrounding land around a residential conversion (as a sensitive receptor) potentially unsuitable for waste management development (and other industrial development).

Page: [Policy E4 Land for industry, logistics and services to support London's economic function](#)

Section: [6.4.1](#)

Section 6.4.1 includes "waste recycling" within a list of industrial logistics and related uses that are essential to the functioning of London's economy. While this is supported, ESA nonetheless recommends that "waste recycling" is deleted and instead replaced with *"additional waste management capacity to handle an expected increase in waste arisings as a result of London's projected population and economic growth"*.

This amendment includes a stronger recognition that planning for waste management and housing are linked and that a greater range of waste management infrastructure (beyond simply waste recycling) is needed to meet London's expected population growth.

Page: [Policy S13 Energy Infrastructure](#)

Section: [S13](#)

ESA recommends deletion of “possible”, with policy B4 therefore amended as:  
(B4) opportunities to utilise energy from waste

ESA welcomes acknowledgement (in Policy B4 and section 9.3.7) of the positive role Energy from Waste (EfW) has to play in meeting London's energy needs, but we note a disconnect with the recent consultation on London's Environment Strategy, which was altogether less positive towards the role of EfW. For consistency we suggest that the Environment Strategy should adopt a similar approach as the London Plan.

London needs a joined up and integrated approach between planning and energy policy to ensure London fully realises the benefits of EfW CHP. Unless the Plan can provide the planning policy framework to help deliver the associated heat network infrastructure and heat customers in the right place most EfW plants will likely remain “CHP ready” but nonetheless operate in electricity-only mode.

The London Plan should also provide a delivery framework against which the success of developing heat network infrastructure can be judged.

Page: [Policy S13 Energy Infrastructure](#)

Section: [9.3.7](#)

Please refer to our response to S13 B4 above, which note that London needs a joined up and integrated approach to planning and energy policy to ensure London fully realises the benefits of EfW CHP.

Page: [Policy SI7 Reducing waste and supporting the circular economy](#)

Section: [SI7](#)

For consistency with policy D1 above, we recommend the following amendment to policy A5 (in bold and italics) to include reference to “other wastes” when making provision for waste collection in new developments.

(A5) developments with adequate and easily accessible storage space that supports the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) food ***and other wastes***.

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ESA recommends the insertion of a new policy within existing Policy A to encourage more innovative approaches to eco-design in helping to achieve the reductions of waste for disposal.

[NEW POINT]: Encouraging better material selection and secondary material use in new products

A raft of complementary policy measures (products designed for better recyclability and measures to stimulate demand for recycled materials) is likely to be required to make a success of this policy.

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While we welcome efforts to require development to promote circular economy outcomes, clarification would nonetheless be welcome (in SI7(B)) on what is meant by “referable applications” (those that are expected to promote circular economy outcomes and aim to be net zero-waste).

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Section: [SI7](#)

ESA recommends an amendment to policy SI7(A) as follows (proposed changes in bold and italics):

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:***

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ESA recommends an amendment to policy A3 as follows (proposed changes in bold and italics):

***working towards*** zero biodegradable or recyclable waste to landfill by 2026 ***while ensuring continued provision for unavoidable landfill wastes***

While supporting efforts to drive waste up the waste hierarchy ESA nonetheless urges caution at the proposed 2026 landfill ban.

Some wastes are simply unavoidable and with no other option than disposal to landfill. Furthermore, the majority of landfilled waste is in fact not biodegradable and so will need planned for, and capacity made available, beyond 2026

Any such ban would of course require relevant input from Defra and the Environment Agency.

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We note that the recycling targets of policy A4 have been derived from the Mayor's draft Environment Strategy, with ESA commenting at the time that targets need to be challenging, yet achievable. Unrealistic targets may lead to perverse outcomes in the London Plan (a statutory, planning document is of course entirely different to a high level, Environment Strategy). With London setting a 65% municipal waste recycling target, for example, there is an implicit assumption that as much as 84% of non-household waste in London can be recycled. This fails to recognise existing contamination rates experienced at recycling facilities.



The London Plan is a statutory, land use plan and while important to include positive policies, the setting of wholly aspirational targets (and with little to justify how these targets would be met by the Plan) is unlikely to deliver the desired outcomes.

ESA therefore suggests that London's recycling targets (and the supporting evidence base) are reviewed more thoroughly against Defra's 25 year Environment Plan to ensure greater consistency. We further note that the draft Plan's assumptions around recycling rates are inconsistent with a raft of other recently published reports (see links below) which generally place expected recycling rates by 2030 in the 50-55% range. This range is also consistent with the recycling levels currently experienced in those EU countries where recycling is more 'mature' and established, while 60% is also likely to be the EU's revised recycling target, when announced as part of its Circular Economy package.

[http://www.esauk.org/esa\\_reports/UK\\_Residual\\_Waste\\_Capacity\\_Gap\\_Analysis.pdf](http://www.esauk.org/esa_reports/UK_Residual_Waste_Capacity_Gap_Analysis.pdf)

[https://www.biffa.co.uk/wp-content/uploads/2015/11/048944\\_BIFFA\\_Reality-Gap\\_2017Single-150817-2.pdf](https://www.biffa.co.uk/wp-content/uploads/2015/11/048944_BIFFA_Reality-Gap_2017Single-150817-2.pdf)

<http://www.sita.co.uk/wp-content/uploads/2017/09/MindTheGap20172030-1709-web.pdf>

Page: [Policy SI7 Reducing waste and supporting the circular economy](#)

Section: [9.7.3](#)

Please refer to previous comments made under Policy SI7(A4) on the proposed municipal recycling targets.

We note that the Mayor has equally ambitious targets for C&D wastes, and yet there is no provision (in the apportionment targets or elsewhere) to ensure that the planning process in London supports delivery of this target.

Page: [Policy SI8 Waste capacity and net waste self sufficiency](#)

Section: [SI8](#)

ESA recommends the insertion of a new policy within existing Policy B to ensure that an element of contingency is factored into Borough level apportionments when allocating sufficient land for waste management facilities.

Such a measure would be prudent: there is of course an element of uncertainty associated with (any) projected waste arisings, while plant down-time or maintenance will require capacity elsewhere to help take up the slack.

***[NEW POINT]: identify additional land for waste treatment facilities and which enables contingency to be factored into the stated apportionment figures.***

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Section 4 of the National Planning Policy for Waste is quite clear: in encouraging appropriate waste management development in the right place, development plans should remain technology neutral. Within existing policy C3, the Mayor clearly states a preference for the type of waste management facilities which should be brought forward to help contribute towards renewable energy generation.

ESA therefore recommends the deletion of existing policy C3, and replaced with the following:

***utilise waste as a resource to generate renewable, baseload energy through a range of appropriate energy from waste technologies***

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We note that the Plan states a carbon intensity floor for energy from waste (EfW) facilities. However, with the majority of (the UK's) EfW facilities currently operating in electricity-only mode the onus is clearly on the Mayor to put a framework in place within the Plan to encourage and increase the levels of heat uptake. This could be achieved through the funding of district heating; encouraging appropriate siting of new plants within close proximity to reliable heat customers; heat mapping to help match up heat customers with suppliers; and require developers to meet CO2 reduction targets (perhaps through greater use of the Community Infrastructure Levy CIL/s106 to help fund the relevant infrastructure).

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ESA recommends the following amendment to policy A1 (in bold and italics):

...***as close as possible to*** the equivalent of 100 per cent of London's waste should be managed within London (ie ***aim towards*** net self sufficiency) by 2026 ***through the delivery of additional recycling and residual waste treatment capacity.***

While ESA support's the policy intent to achieve net self-sufficiency this policy is unlikely to be achievable. Land values and constraints are likely to mean that London will continue to be reliant upon export of waste to neighbouring authorities (outside London) beyond 2026.

We reiterate here concerns expressed elsewhere, that the draft London Plan currently fails to make clear the additional capacity required to achieved SI8 policy aims (including the necessity of EfW facilities beyond 2026).

ESA recommends the following amendment to policy A2 (in bold and italics):

existing waste management sites should be safeguarded ***unless a site is already compromised through previous encroachment by sensitive receptors.***

ESA supports a more flexible policy approach to that espoused within the Plan whereby existing waste management sites which are not viable for long term future waste management needs of London can be released, where it can be demonstrated that such release has no detrimental loss to overall capacity and capability for waste management and recycling in London. These sites could be released in circumstances where previous residential encroachment has compromised the continuing viability of such sites, inhibiting their ability to operate at optimum efficiency or allow for investment in future expansion.

For those sites that are viable for long term waste management and recycling use those sites should be protected under planning policy to prevent encroachment and restriction from non-compatible uses (such as housing). This should help ensure that waste management facilities remain viable to manage and recycle London's waste throughout the plan period with no detrimental impact on capacity or operating hours.

ESA recommends the following amendment to policy A4 (in bold and italics):

new waste management sites should be provided where required ***to help contribute to the alleviation of London's waste capacity shortfall.***

This amendment would ensure that the London Plan is consistent with other local development plans across the country, whereby local authorities tend to explicitly state the waste capacity gap that needs to be addressed over the plan period.

Page: [Policy S18 Waste capacity and net waste self sufficiency](#)

Section: [Table 9.1](#)

The London Plan limits predicted waste arisings to tonnages of household and commercial and industrial (C&I) wastes only (and at the exclusion of all other waste streams). The data in Table 9.1 is therefore based on a small fraction of the total wastes arisings that will be produced by London over the plan period. From a waste planning perspective, this in turn underestimates the amount of land, premises and capacity needed to be made available by London's Boroughs to support policy E4(A)(3) (provision for secondary materials and waste management).

National Planning Practice Guidance is quite clear and lists the wastes that should be considered and planned for within local plans (paragraph: 013 Reference ID: 28-013-20141016). We note that construction and demolition; low level radioactive; and hazardous wastes are among notable omissions from the data presented in Table 9.1 (and Table 9.2).

Table 9.1 fails to account for London's total waste arisings, and we therefore recommend that a new and updated waste arisings review should be undertaken, which utilises the most recent planning guidance on waste; is fully transparent over all data input assumptions used; and makes use of the most up to date data available. Furthermore, we believe it would also be prudent to factor in 'contingency planning' within predicted waste arisings. This would not only help ensure sufficient waste management 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 London Plan, which we consider highly likely.

Similar to our response to Table 9.1, ESA has considerable concern around the assumptions used to support the Borough level apportionment figures. By limiting apportionment to predicted tonnages of household and commercial and industrial (C&I) wastes only the Borough level apportionment figures are based on a small fraction of the total wastes arising produced by London over the plan period. This in turn underestimates the amount of land, premises and capacity needed to be made available by London's Boroughs to support policy E4(A)(3) (provision for secondary materials and waste management).

National Planning Practice Guidance is quite clear and lists the wastes that planning authorities should plan for. We note that construction and demolition; low level radioactive; and hazardous wastes are notable omissions from Table 9.2. Somewhat surprisingly, the evidence base used to support the apportionment figures (Task 4 background paper) refers to PPS10 to justify the approach taken, a document which was of course withdrawn as the Government's national planning policy guidance for waste in 2014.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/364759/141015\\_National\\_Planning\\_Policy\\_for\\_Waste.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

Notwithstanding the fact that the proposed apportionment figures fail to account for London's total waste arisings, it would also be prudent to factor in 'contingency planning' to the apportionment figures. This would not only help ensure sufficient waste management 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 Plan, which is considered highly likely.

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Section: [Table 9.3](#)

We suggest that the assumption that the export of waste out of London is predicted to drop to zero by 2026 is fundamentally flawed. We expect that London will inevitably continue producing non-recyclable, non-combustible residual waste (which would simply not meet the tight input specifications of energy from waste plants within London – or elsewhere for that matter) for which there is no other option but to dispose of in landfill sites outside London.

Table 3 is also somewhat at odds with the principle of net-self sufficiency, which allows for the flow of material across administrative boundaries (ie into and out of London).

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Section: [9.8.1](#)

For consistency with the approach taken in other development plans across the country, the London Plan should make reference to the quantity of waste arisings that should be accommodated for over the plan period. Section 9.7.2 suggests that that figure is approximately 18million tonnes.

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Section: [9.8.2](#)

We note the commitment for zero biodegradable waste to landfill by 2026. As above, it is likely that there will be a fraction of waste for which there is no viable alternative than disposal in landfill (including non-combustible biodegradable wastes) and for which the London Plan should make continuing provision for.

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Section: [9.8.3](#)

ESA welcomes the Mayor's commitment to address cross-boundary flow issues but suggests 9.8.3 could be further improved with the following amendment (in bold and italics):

The Mayor will work with boroughs, the London Waste and Recycling Board and the London and neighbouring Regional Technical Advisory Bodies (***or neighbouring local authorities where such bodies do not exist***) to agree an approach to addressing cross-boundary waste flow issues, ***which enables local authorities to meet their obligations under the duty to co-operate***



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Section: [9.8.4](#)

While the Plan correctly recognises the supporting role that RDF/SRF export is currently playing to help compensate for the shortfall of EfW capacity in the UK, ESA nonetheless urges caution at bullet point two of section 9.8.4 which could be taken to infer that the production of RDF/SRF in London is capable of counting towards Boroughs' apportionment targets. This should not be the case.

The production of RDF/SRF should be considered an intermediate step in the waste treatment process and therefore not capable of contributing towards Borough-level apportionment targets. As drafted, the Plan appears to be confusing RDF/SRF *production* with RDF/SRF *deployment*.

Unless the Plan actively delivers the development of additional energy from waste capacity within London then the production of RDF/SRF in London is likely to continue to be destined for export and the benefits of energy recovery realised elsewhere.

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Section: [9.8.5](#)

Section 9.8.5 is misleading: given the lack of domestic demand, most RDF and SRF produced in London (and the UK) will be exported to facilities overseas and thus contribute less to London's energy security than otherwise suggested in the Plan.

Therefore, we suggest an amendment to section 9.8.5 to remove reference to 'local' as follows:

***Supporting the production of SRF and high quality RDF feedstock will help promote energy generation*** [also delete remainder of draft section 9.8.5]

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Section: [9.8.6](#)

Given previous comments above (that the Borough level apportionment figures fall well 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 required to be made in line with the apportioned tonnages within table 9.2.

ESA strongly recommends that the Plan accounts for London's total waste arisings over the plan period and makes relevant provision accordingly through land allocations.

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Section: [9.8.9](#)

Subject to the caveats above (Policy SI8 (A1)), ESA supports the principle of net self-sufficiency and the policies designed to assist London towards this aim. Net-self sufficiency of course recognises the flow of waste across administrative boundaries as a two way process, and we therefore question the assertion that exports need to be reduced to zero by 2026.

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Section: [9.8.11](#)

As per our previous response (policy SI8(D3)), with the majority of (the UK's) EfW facilities currently operating in electricity-only mode the onus is clearly on the Mayor to put a framework in place within the Plan to encourage and increase the levels of heat uptake. This could be achieved through the funding of district heating; encouraging appropriate siting of new plants within close proximity to reliable heat customers; heat mapping to help match up heat customers with suppliers; and require developers to meet CO2 reduction targets (perhaps through greater use of the Community Infrastructure Levy CIL/s106 to help fund the relevant infrastructure).

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Section: [9.8.12](#)

Please refer to our previous response (SI3 policy B4) on recommendations on how the Plan might further bolster demand for heat off take.

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Section: [9.8.13](#)

This section advises that s106 contributions should be used to ensure the necessary (CHP) infrastructure is put in place to the (EfW) site boundary. As above, this is already common practice and most EfW facilities are designed to be “CHP-ready”. However, the Plan is largely silent on ensuring a system is in place to encourage demand and use of heat beyond the EfW site boundary. As noted above unless the Plan can provide the planning policy framework to help deliver the associated heat network infrastructure and heat customers in the right place most EfW plants will likely remain “CHP ready” but nonetheless operate in electricity-only mode.

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Section: [9.8.15](#)

We welcome acknowledgement in section 9.8.15 that there are other wastes (beyond household and commercial and industrial wastes) that Boroughs should seek to manage and plan for accordingly. However, it is unclear if the 324k tonnes of hazardous waste noted as being produced in London (in 2015) has been included within the apportionment figures of table 9.2 (although we suspect this has been omitted).

The need for planning and provision towards hazardous waste appears somewhat of an afterthought, but in reality the hazardous waste market is highly specialised differing markedly from the general commercial, industrial and domestic waste markets. The Government’s Hazardous Waste Strategy and Hazardous Waste National Policy Statement have helped create a broad policy framework for the planning of new hazardous waste facilities, and reference to such in the Plan would be welcome first step in assisting Boroughs to make adequate provision in planning for this waste stream.

This section contains a number of broad, sweeping statements – not all of which are entirely accurate. We address each in turn as follows:

Good design: while ESA Members strive to adopt good design into new waste development projects, waste management facilities - by their very nature - will need to carefully balance functionality and architecture.

Circular economy: we welcome the Plan's positive approach to encouraging development which support the circular economy, but note that a wider scope of activities than those cited in 9.8.16 could well be brought forward by the industry and should be equally encouraged and supported.

Transport by water and rail: sustainable modes of transporting waste (by river or rail) should of course be considered, however, the Mayor might address the significant commercial constraints which can limit the use of these modes of transport to substantial flows of waste.

Landfill: if there are no further landfill opportunities in London then the Mayor should seek to ensure sites are sourced elsewhere for London's non-recyclable and non-combustible residual waste.

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Section: [9.8.17](#)

Encroachment on existing (and allocated) waste management sites by residential development is a key concern for the waste management industry and which can significantly undermine the performance and economic viability of such sites. This is an issue that is likely to threaten more waste sites as pressure for housing in London increases.

We therefore suggest that section 9.8.17 (Agent of Change principle) is important enough to merit inclusion as a new policy in Policy S19(A).

NEW POLICY (S19(A)) ***Following the Agent of Change principle, developments adjacent to waste management sites should be designed to minimise the potential for disturbance and conflicts of use.***

Page: [Policy S19 Safeguarded waste sites](#)

Section: [S19](#)

We welcome the Plan's positive approach to safeguarding of waste sites but as noted above (please see response to policy S18(A2)) a degree of flexibility should be included.

ESA therefore recommends the following amendment to policy S19(A) (in bold and italics)

existing waste sites should be safeguarded and retained in waste management use ***unless a site is already compromised through previous encroachment by sensitive receptors.***

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As currently drafted Policy SI9(B) would benefit from revision and clarification, as we are unclear as to the policy intent.

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We support policy SI9(C) whereby existing waste management sites which are not viable for long term future waste management needs of London can be released, but where it can be demonstrated that such release has no detrimental loss to overall capacity and capability for waste management and recycling within London.

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Section: [9.9.1](#)

It should be noted that not all of the 500 identified waste sites would be able to make a meaningful contribution to the London Plan (e.g. a proportion of such will be small-scale exempt sites; or sites with planning consent but no environmental permit and therefore non-operational).

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Section: [9.9.2](#)

Please see our response to policy S19 C above.

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Section: [9.9.3](#)

This section would benefit from additional clarity that the release of wastes sites should only be permitted where no overall net loss of capacity can be demonstrated.

Page: [Policy S110 Aggregates](#)

Section: [S110](#)

ESA recommends the following amendment (in bold and italics to policy S10(A1):



An adequate supply of aggregates to support construction in London will be achieved by:

1) encouraging re-use and recycling of:

- **secondary aggregates,**
- construction, demolition and excavation waste
- **Incinerator Bottom Ash (IBA) from energy from waste treatment**
- **aggregates from street sweeping residues**

This proposed 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.

In support of this suggestion it is perhaps worth noting that this proposed change would allow for greater consistency with national policy. Latest Defra recycling statistics have been amended to include for the first time the recovery of metals from IBA, which has served to help increase the overall UK recycling rate. The importance of IBA as a resource is now increasingly being recognised.

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Section: [11.1.42](#)

While we 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 energy from waste facilities to provide relevant infrastructure up to the site boundary but little provision in the Plan to develop the associated infrastructure beyond that.

As above, there is much more that the Plan could do to facilitate uptake of this wider district heating network, such as: exploring options to fund district heating; encourage the appropriate siting of new plants within close proximity to reliable heat demand; a heat mapping exercise to help match up heat customers with suppliers; use of CIL/s106 to require developers to meet CO2 reduction targets – thereby incentivising investment in development of district heating.

The London Plan should therefore 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's performance should be measured against. Such measures are essential to deliver the heat networks needed to supply London homes.