THE LONDON PLAN: The Spatial Development Strategy for Greater London
Draft for Public Consultation

Response from Veolia

About Us

Veolia is the UK leader in environmental solutions, providing a comprehensive range of waste, water and energy management services designed to build the circular economy and preserve scarce raw materials. Our business strategy is focussed on manufacturing green products and generating low-carbon energy, helping our customers and suppliers reduce their carbon impact.

Veolia London has activities in over half of London's Boroughs. These activities range from household recycling and waste collection services, street cleansing, landscaping and maintenance of parks and open spaces, to the operation of modern waste recycling, treatment and disposal facilities.

Veolia therefore welcomes the opportunity to input to the Mayor's consultation on the London Plan and we hope that our contribution adds to the overall debate on this issue.

Comments

Veolia supports the aspirations set out in the London Plan but notes that there will be challenges to overcome if these aspirations are to become a reality. We also recognise that there are areas where we believe the Plan could go further to achieve the desired aims.

Policy SI3 Energy Infrastructure

Veolia supports this policy. Increasing the amount of renewable energy sources in London will be important to meet the Mayor's zero-carbon target. A key part of this will be maximising the utilisation of energy from waste and developing new and existing district heating networks.

District heating solutions are designed to deliver the best energy efficiency for the communities they serve, which range from private developments, social housing, community, education and commercial buildings, to campuses or even whole cities. Supplying centralised heat and potentially electricity and cooling, they can be fed by Energy from Waste facilities, local Combined Heat and Power (CHP) or biomass. Major benefits include cost savings, greatly reduced emissions and carbon footprint, independent electricity supply and less exposure to electricity price fluctuations.

In London, Veolia operates the district heating network in Southwark from South East London Combined Heat and Power plant (SELCHP) which provides circa 3,000 local properties with heat and hot water. This scheme has proven very valuable in assisting the council's fight against fuel poverty by producing heat cheaper than gas and providing low

carbon heat, as the waste that SELCHP burns is approximately 60% renewable carbon. The system saves an estimated 8,000 tonnes of CO_2 per year.

There is the potential to significantly increase the district heating network from SELCHP, which has been designed to allow for additional connections to be made in the future. We are also exploring the possibility to install private wires for electricity connections with private developers and/or businesses. The benefits of private wire networks include localised energy security and more certainty over the costs for use of the network in the longer term.

The Mayor could support such projects by making it easier to develop heat networks in London and linking new developments to local generators.

Policy SI7 Reducing waste and supporting the circular economy

Veolia supports the promotion of a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible. Veolia also supports the encouragement of waste minimisation and waste avoidance through reuse of materials and using fewer resources in the production and distribution of products.

We believe that central to achieving these two ambitions will be to:

- Make recycling opportunities available to more people and make recycling easy to do (including more consistent collection systems)
- Ensure products and packaging are designed with waste reduction and recyclability in mind (producer responsibility)
- Stimulate demand for recycled materials through stronger commitments to utilise these materials in the manufacture of new products or packaging. This will have a pull effect on front end recycling and develop more resilient end markets for recycled materials.

Ensuring that there is zero biodegradable or recyclable waste to landfill by 2026 will be a challenge and will be reliant on a combination of measures that boost recycling and measures that divert residual waste from landfill. For example, increasing the number of properties that receive a separate food waste collection service will be important in boosting London's recycling rate and diverting waste from landfill.

Opportunities should also be maximised to generate low-carbon energy in London from residual waste. In London, approximately 750,000 tonnes of household waste still goes to landfill every year. The majority of this waste is suitable for energy from waste, which has been proven to be a more sustainable treatment option than landfill as these EfW facilities produce energy and potentially heat for residential and commercial use. Furthermore, metals can be extracted for recycling during post-treatment processing and incinerator bottom ash can be recycled into aggregate for use in construction materials.

We recognise that achieving a 65 per cent recycling target for municipal waste in London by 2030 will be challenging. Inner London boroughs tend to have lower recycling rates than

Outer London boroughs, for a number of reasons including Outer London boroughs having more green waste (which is dense) and Inner London boroughs typically being made up of a high proportion of high rise/multi-occupancy accommodation. With that in mind, the Outer London boroughs will inevitably need to achieve recycling rates beyond 65% to achieve an average of 65% across London.

We believe more could be done to ensure developments have adequate and easily accessible storage space that supports the separate collection of dry recyclables and food. Additionally, clear signage to identify which bins are for recycling and which are for residual is crucial. It should always be borne in mind that the easier it is for residents to recycle, the more likely it is that they will recycle. This should be considered at the building design stage as it is more difficult to retrofit buildings to add this in at a later date. It is therefore vital to think ahead and involve the waste management sector when considering the design of waste collection systems and bin storage areas.

Developers could consider the use of Envac technology to suck the waste out, or bin chutes that facilitate both residual and recycling collection. Consideration should also be given to how the bins will be collected in practice, often vehicles cannot access the bin store because of height restrictions or other such constraints and this adds to the difficulties of waste management.

Each new development should be required to meet a set of minimum sustainability standards. We believe the concept of a ‘Circular Economy Statement’, as proposed in the Plan, would go some way to achieving this. Perhaps there should also be some form of sounding board made up of experts across the varying sectors (such as waste, water and energy) to ensure any new developments meet the needs of all these essential services.

In addition to the capacity and segregation issues mentioned above, we believe more needs to be done to promote behaviour change so that recycling becomes the norm. Ongoing education and a recycling campaigns could form part of this to help increase participation levels and reduce contamination.

Policy SI8 Waste capacity and net waste self-sufficiency

We agree with the ambition that London should be working towards managing most of its waste within its boundaries; however we recognise that in practice this may not be fully achievable, or indeed desirable, in such a dense urban environment. There will be occasions when the best environmental option will be to manage some waste outside of the capital, for instance hazardous wastes (e.g. asbestos) and the treatment of organic waste due to odour issues. In such instances, it may be best to manage these via small strategically placed waste management centres in order to consolidate transport for treatment outside London.

The provision of the right type of infrastructure in the right places will be central to the delivery of this ambition. We recognise that there is currently a shortfall of both recycling and thermal treatment capacity in the London area, with London exporting 6 million tonnes of

waste to other parts of the UK and 1.3 million tonnes of waste outside of the UK[1]. If London is to be self-sufficient, this will require additional transfer stations for the consolidation of materials for onward movement, household waste recycling centres and repair workshops as well as the larger facilities such as Materials Recovery Facilities or Energy from Waste plants.

However, land in London of sufficient area to accept waste facilities is relatively scarce as well as being expensive. It is also difficult to find sufficient space to park refuse collection vehicles (some contracts in London operate up to 200 refuse collection vehicles). Moreover, we have found that obtaining planning permission for waste facilities is one of the biggest challenges to the development of waste infrastructure in the capital and can be a significant blocker to the timely delivery of key infrastructure projects.

We would suggest that there needs to be a strategic look at where would be best to site new waste infrastructure, set this land aside and explore the possibility to ease the planning process to ensure a project goes ahead when considered to be of economic and social importance. This could be facilitated by the Mayor in cooperation with the London Boroughs.

Policy SI9 Safeguarded waste sites

As suggested above, land upon which to build waste sites in London is extremely difficult to come by. In order to prevent waste travelling long distances (with the associated GHG emissions) there will always be a need for local waste infrastructure. Veolia, providing waste services to 40 percent of Londoners, are in a relatively unique position operating a number of waste facilities in London - Southwark Integrated Waste Management facility, SELCHP, Brent RDF plant and Greenwich Bulky MRF. Many of our competitors that are not big players in London will therefore not have the same incentives to locate within London as land and labour costs are higher.

Protecting existing waste sites/ land currently designated for waste management activities is therefore important. However, there will also need to be some flexibility when selling a waste site, because limiting the number of potential buyers can make it difficult to sell or effectively reduce the price you'd get for the sale due to reduced demand/competition.

In any case, local plans must consider the need for waste sites as part of a holistic approach to land use.

Further comments

Future Planning - Whilst in the Plan there are forecasted arisings of household and C&I waste, it would be useful to break this down by type (i.e. recycling or residual). This would help identify where the capacity gaps are and allow the waste sector to invest in the right infrastructure/ technologies to treat these different types of waste. It would also be useful to discuss how the composition of waste may change over time e.g. paper on the decrease

[1] London Assembly Environment Committee report on Waste: Energy from waste https://www.london.gov.uk/sites/default/files/waste-energy_from_waste_feb15.pdf

through more online reading, and whether any new materials are on the horizon that could pose new challenges for waste management in the future.

Affordable Housing - It should be kept in mind that waste facilities employ a high number of low skilled and/or low paid jobs, such as pickers at Material Recovery Facilities, street sweepers and refuse collectors. Even with the London Living Wage, employees often struggle to afford accommodation in London. The provision of affordable housing in London for key workers is therefore necessary to ensure these jobs can be filled.

Building costs - Within London any measure to reduce noise etc on a waste site will add to the cost of delivering a project. This all needs to be taken into consideration as there will become a point when adding these additional features will result in the project becoming non-financially viable.

Collection times - As we will likely see the introduction of electric refuse collection vehicles in the near future in London, making significantly less noise, we believe this provides an opportunity to explore night-time working so as to reduce congestion on the roads during peak times. Night-time working was adopted during the 2012 Olympics and was deemed successful, having received very few complaints from local residents. During this period of night-time working Veolia also recorded efficiency improvements in terms of shift productivity and fuel consumption.

Waste consolidation - Business Improvement Districts (BIDs) such as in the West End could be a good option for SMEs that aren't tied into national waste management contracts (as would be the case for many large chains). This would reduce the number of refuse collection vehicles on the road at any one time, helping to ease congestion and improving air quality. However we have found with the existing BID there is little enforcement over waste carriers working during times they shouldn't be.

Digital solutions - Smart technology including bin sensors can help to improve the efficiency of waste management. We have deployed bin sensors onto some of our large commercial bins, so we collect them only when they are full. However this technology will not be suitable for all bin types; and refuse collection vehicles need to be able to collect enough bins on a round to make the journey economically and environmentally worthwhile. Nevertheless, data can be very useful to inform decisions, such as route optimisation. In the future it may even be possible to share some of this data with consumers to help drive behaviour change, such as London has recycled X tonnes of waste on that day.

Case Studies - We could also look to other cities around the world who are adopting innovative ideas to boost recycling and examine whether they could be replicated in London.