

► Waste management

► London Councils response to Environment Committee Investigation

London Councils represents London's 32 borough councils and the City of London. It is a cross-party organisation that works on behalf of all of its member authorities regardless of political persuasion.

Introduction

In London, 12 boroughs both collect and dispose of waste. Four of these boroughs have formed a voluntary waste partnership, the South London Waste Partnership. The remaining 21 boroughs only collect waste and then have four, sub-regional statutory joint waste disposal authorities (SJWDAs), which are responsible for disposing of this waste. These joint waste disposal authorities are East London Waste Authority (ELWA), North London Waste Authority (NLWA), West London Waste Authority (WLWA), and Western Riverside Waste Authority (WRWA). Arrangements for reuse and recycling vary. Disposal is generally either to waste facilities that directly or indirectly generate electricity and/or supply heat energy and landfill sites that may capture methane to generate electricity. The London Waste and Recycling Board brings together borough and Mayoral representatives. London Councils nominates borough representatives to the Board, Resource London and the Investment Committee and is involved in LWARB's Circular Economy work.

Consultation response

1. **As the Mayoral administration reviews the GLA's policies and programmes, what are the issues and challenges in seeking to reduce the costs and environmental impacts of London's waste and how it is handled? You may wish to consider:**
 - a. Reducing the materials content of goods and packaging;
 - b. Re-use, repair, sharing and other 'circular economy' methods for keeping used goods out of the waste stream;
 - c. How to increase recycling rates and improve household recycling collection systems and Londoners' use of them;
 - d. How to increase anaerobic digestion and the segregation of volatile waste matter from residual dry waste;
 - e. Disposal of waste that is not recycled, and the role and environmental implications of energy from waste by incineration or other methods.

The costs of waste management are significant for boroughs, and rank highly in borough expenditure by service. Waste is a council service that affects every Londoner, and is given high member priority. Population growth means the demands on waste services will continue to grow. Waste management is an area where London, the Mayor, the boroughs and the joint waste disposal authorities cannot work in isolation; much of the approach to waste management is governed by national and European policy. The Mayor can therefore work to champion the issue of waste and the circular economy and continue to apply pressure on the government to look at creating a waste system that incentivises the waste hierarchy.

We support efforts to introduce greater producer responsibility, both in the design of packaging and the disposal of this packaging. These measures are currently voluntary and need to become mandatory. The government's implementation of its Litter Strategy is looking at voluntary measures but these need to go further and faster.

Boroughs are already active with the support of a series of initiatives such as Love Your Clothes to help residents make smart choices when purchasing clothes, how to care, repair and upcycle them and avoid them going to landfill when they do dispose of them. This sort of activity will only remain niche unless more work is undertaken by the major fashion retailers to adopt more responsible approaches.

We welcome LWARB's work to identify a routemap to the circular economy in London. The Mayor needs to continue to work with boroughs and joint waste disposal authorities to implement this approach in a holistic way. Investing in circular economy businesses is a good way for the Mayor and LWARB to demonstrate how to achieve these goals and we support the approach being taken on this. Nevertheless, achieving a circular economy transition will require a supportive national and international framework.

LWARB has undertaken considerable work on ways to increase recycling rates. England's recycling rates are stagnating nationally, but the challenge in London will always be more complex than other parts of the UK, due to the transience of population within and into / out of London; the high density of flatted properties, and the sheer variety of flatted properties (converted houses, purpose built, high-rise, above shops) all with potentially different arrangements and space provided for waste and recycling depending on when they were built; and the lower proportion of homes in London with a garden, not only in inner London but where people live in flats in outer London as well, reducing the amount of garden waste it is possible to collect. Boroughs are alive to this challenge and many are introducing new services with some impressive improvements in recycling rates.

Harmonisation is a much mooted solution to improving recycling rates. We support all efforts by boroughs to make recycling easier for their residents, but wholesale changes to waste collection arrangements are costly and collections of certain waste types (for example food) may be logistically complex. If the Mayor and government want to see harmonisation of waste collection arrangements in London, significant funding will have to be available to boroughs to achieve this. Without any funding, we believe harmonisation may occur over time, as contracts end, but this could take decades.

We also want to see the Mayor targets concerning household waste changed to municipal waste to encompass a broader definition that enables boroughs to include collections made by commercial collection teams as part of services paid for by businesses. We continue to support the work being done by LWARB and London Business Waste and Recycling to support boroughs develop their commercial waste services if they want to. This can help

achieve the aims in the draft Mayor's Transport Strategy to consolidate the number of waste collection vehicles on London's streets.

Energy from waste services have a role to play in the management of London's waste and the resulting energy source can and should have an important role to play in the Mayor's plans for an increase in district heat networks and energy from renewable sources. We want to see construction consolidation centres and a circular economy approach that enables the reuse of as much construction and demolition waste as possible.

The GLA has already identified that many of London's waste sites lie in Opportunity Areas or Growth Zones. For London to support the circular economy, adequate industrial land will need to be allocated in the London Plan. As employment sites support the Mayor's 'mixed use development' approach, consideration needs to be given to making existing sites 'good neighbours'. If sites need to be reallocated, given the pressures on land, the Mayor will need to identify how much of a priority net waste self-sufficiency is to ensure it is not 'crowded out' for example by regeneration. In doing so, the Mayor would need to refresh the London Plan indicators for the amount of land that is needed on average for the treatment of different types of waste, as it appears that moving towards a more circular economy may require more space (for example greater levels of repair and refurbishment taking over from recycling and disposal).

2. How, and how well, do the Mayor's current policies and programmes promote the sustainable management of London's waste?

The waste hierarchy forms a clear part of the Mayor's policies and LWARB's and Resource London's policies and programmes reflect this hierarchy well. Any future iteration needs to have circular economy principles at its core to push the hierarchy towards the most sustainable options.

3. What new or different ideas and approaches could improve the Mayor's policies? Are there examples from other parts of the country or the world? If you could provide or point to specific documents setting out these ideas or approaches this would again be very helpful.

We want to see waste management considered in the design and build of new properties, especially flats. LWARB's guidance on flatted properties should become part of the London Plan Supplementary Planning Guidance. We know that borough officers often spend considerable time negotiating adequate waste solutions for new-build properties during the planning process. More robust minimum standards and future-proofing of waste requirements in new developments in the London Plan would help. There is also scope for the GLA and boroughs to work more closely with business and business improvement districts to encourage the consolidation of waste collection arrangements from multiple businesses in an area, as is already happening in some parts of London. For example, the West End Buyers Club has a 'preferred supplier' list for waste collection, as well as a series of other business supplies.¹ Local authorities may be best placed to win these tenders or join frameworks given their existing services. This would also help achieve economies of scale and support a circular economy.

¹ <https://www.westendbuyersclub.london/>

4. How should the Mayor change policies or programmes? Consideration could be given to the Environment Strategy, the Resource London project, the London Energy Plan, the London Plan and other relevant policies and programmes.

We want to see waste considered more holistically in the development of policies in planning, transport, housing and energy. We also feel that whilst LWARB and Resource London undertake excellent work on behalf of the GLA and boroughs, there is already a huge variety of programmes and the priority should be identifying those that are delivering the best results, and identify how these can be developed further and applied locally, rather than the commencement of further new ones.

We remain concerned about discussion of targets relating to waste management. This runs counter to the Mayor's approach of flexibility towards boroughs in other policy areas and is something we will monitor carefully. If the Mayor feels targets are the only appropriate approach to waste management, we want to see targets to reduce landfill and reduce waste arisings overall, which is more in line with the waste hierarchy, rather than solely targeting increases in recycling. Using tonnages for targets doesn't necessarily incentivise the most sustainable approach to waste management. For example, food waste is very heavy, increasing tonnages, but the focus should really be on reducing the amount of food people throw away, and this needs involvement from supermarkets.

We would support the Mayor undertaking some feasibility work on introducing a producer responsibility scheme in London. Whilst this would put London at odds with the rest of the country, it would demonstrate commitment to reducing waste in London and provide a pilot for government to consider roll-out to the rest of the UK. Similar action on single-use products that are easily replaced by reusable alternatives, such as plastic bottles, could be considered and the Mayor may be able to provide the necessary infrastructure on GLA land, for example drinking fountains. This work between local government and producers does need to be joined up to make sure that manufacturers do not focus only on high value materials such as waste electrical and electronic equipment (WEEE), leaving local authorities to manage low value items.

We want to see the Mayor use the GLA Group procurement powers to drive a shift in the circular economy, for example by purchasing reuse materials first, and then recycled.

We want to see the London Plan set out tougher conditions for developers in managing their construction waste. Site waste management plans should require reuse first, then recycling, and then energy recovery from materials.