



City of London Corporation
City Plan 2040 — Examination in Public
Matters Statement

Main Matter 14 – Circular Economy and Waste

Are the requirements for Circular Economy and Waste justified by appropriate available evidence, having regard to national policy and guidance, local context, and are they in ‘general conformity’ with the London Plan?

The requirements of the policies in the CP relating to circular economy and waste are justified by appropriate available evidence and have regard to national policy and guidance, local context and the London Plan. The relevant evidence documents for waste and the circular economy are the Waste Topic Paper 2024 (ED-CRE1), the SELJWPG Technical Report 2022 (ED-CRE3) and the Waste Arising Capacity Study 2016 (ED-CRE2). These documents provide a robust evidence base which provide explanations of how the City Corporation plans for, and manages, its waste.

Achieving sustainable development is at the core of the NPPF, which includes an environmental objective which seeks to use natural resources prudently and minimise waste (paragraph (8c)). The NPPF para 20 (b) states that strategic policies in Plans should make sufficient provision for waste management.

Paragraph 4 of the NPPF explains that the policy on waste should be read in conjunction with the National Planning Policy for Waste (NPPW 2014) which sets out policies to establish the need for waste management and the requirement to identify suitable waste sites to meet local demand.

Paragraph 4 of the NPPW states authorities should identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations. Given the highly built up nature of the Square Mile, CP paragraph (13.6.3) explains that there is no viable waste management capacity in the City. Therefore, the City Corporation manages its waste in cooperation with the South-East London Joint Waste Planning Group and member authority Bexley who take the City’s waste apportionment, as set out in CP paragraph (13.6.4).

Paragraph 5 of the NPPW encourages the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport. CP policy (CE1) aligns with the NPPW and seeks to minimise the environmental impact of waste by encouraging the use of rail and waterways for the transportation of waste, including deconstruction waste and delivery of construction materials. CP paragraph (13.7.7) explains that the City Corporation will continue to work with the Port of London Authority, Marine Management Organisation and the Environment Agency to enable sustainable use of the River Thames for the movement of freight and waste. CP policy (S16c) aims to safeguard Walbrook Wharf as a waste site and wharf suitable for the river transport of waste.

Paragraph 8 of the NPPW states that when determining planning applications for non-waste development, local planning authorities should ensure that new, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development.

The CP aligns with this aim through policy (CE1) which states that all development proposals should incorporate waste facilities, which must be integrated into the design of buildings and allow for separate treatment, storage and off-road collection of waste and recyclable materials, where feasible. Major developments should provide a single waste collection point to facilitate efficient waste management from multi-tenanted buildings.

NPPW paragraph 1 outlines circular economy principles as an aim for waste management in the form of securing the re-use, recovery or disposal of waste without endangering human health and without harming the environment. The CP responds in policy (S16) by seeking to support businesses and residents in moving towards a Zero Waste City, by applying circular economy principles, the waste hierarchy and the proximity principle at all stages of the development cycle. CP paragraph (13.6.7) recognises the importance of the City adopting circular economy and waste hierarchy principles, to cut down on the quantity of useable materials that are discarded and to eliminate reliance on disposable items, including single use plastics, in the City. Those materials that are discarded should be managed as close as possible to the City and transported by modes that are least damaging to the environment. Design policies in the CP (particularly DE1 part 7) seek to promote circular economy design approaches; (see Matter Statement 8 for more details).

LP policy S17 (part A) states that *“Resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration...”*. (part B) states *“Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted...”*.

CP strategic policy S16 aligns with the LP by stating that the City Corporation will actively cooperate with other Waste Planning Authorities (WPA’s) in planning for capacity to manage the City’s residual waste through contributing to the Mayor of London’s aim to manage as much of London’s waste within London as practicable.

The City Corporation is a member of the South-East London Joint Waste Planning Group (SELJWP) which was originally formed by five London unitary waste planning authorities working together to identify and meet subregional requirements for waste management facilities. The initial group consisted of the London boroughs of Bexley, Bromley, Lewisham, Greenwich and Southwark. The City Corporation subsequently joined the group, with Bexley taking responsibility for the City’s apportionment, paragraph (13.6.4).

CP policy S16(1) aligns with LP policy SI7 by seeking to apply circular economy principles to support businesses and residents in moving towards a Zero Waste City. CP paragraph (13.6.8) states the City Corporation will apply circular economy principles to design out waste and pollution and keep products and materials in use.

LP policy SI8 (Part B.3) requires development plans to “... *provide the capacity to manage the apportioned tonnages of waste, as set out in Table 9.2.*” The policy seeks to manage London’s waste sustainably so that the equivalent of 100% of London’s waste is managed within London (net self-sufficiency) by 2026.

CP paragraph (13.6.2) acknowledges that the LP has set a waste apportionment figure requiring the City to identify sites with capacity to manage 90,000 tonnes of waste annually by 2041, with an apportionment in 2021 of 84,000 tonnes. This figure represents the City’s contribution to meeting the Mayor’s target of 100% net self-sufficiency in the management of London’s household and commercial and industrial waste from 2026.

LP policy SI9 safeguards existing waste sites and encourages them to be retained in waste management use. CP policy (S16c) is in alignment by aiming to safeguard Walbrook Wharf as a waste site and wharf suitable for the river transport of waste. The City Corporation will continue to safeguard Walbrook Wharf as a waste site and river wharf in line with the London Plan and the Safeguarded Wharves Direction. Any proposed development which would prejudice the operation of the existing safeguarded waste site at Walbrook Wharf will be refused, paragraph (3.6.11).

Based on the responses received under the Regulation 19 Consultation there were no significant modifications considered necessary for policy wording related to waste. The Mayor of London stated that minor changes to policy should be made so that it is clear that waste movements from the City to locations outside London will be monitored and regular communication with the GLA will occur. These suggestions, which have been proposed, would ensure there is no non-conformity issue on this point.

Are the policies relating to Circular Economy and Waste positively prepared ‘in a way that is aspirational but deliverable’?

Yes, the policies in the CP relating to circular economy and waste are positively prepared in a way that is aspirational and deliverable. Strategic waste policy (S16) sets out a high-level vision for dealing with the City’s waste in terms of waste facilities in the City and accessing capacity for waste in other boroughs. The City Corporation has successfully worked with members of SELJWPG and secured confirmation, through the SELJWPG Technical Report 2022 (ED-CRE3), that there is sufficient capacity for the City’s waste to be accommodated over the life of the Plan.

It is considered that the policies on waste are deliverable. CP paragraph (13.6.7) recognises that the City must adopt circular economy and waste hierarchy principles, to cut down on the quantity of useable materials that are discarded and to eliminate reliance on disposable items. Data on waste is collected nationally and stored in the Environment’s Agency Waste Interrogator database. The 2022 Interrogator figures show that waste produced in the City from construction, demolition and excavation and waste from household, commercial and industrial sources has reduced since 2020, due to the implementation of current 2015 Local Plan circular economy policies. It is anticipated that CP policies, which take a similar approach to the 2015 LP policies on waste and the circular economy, will continue to reduce the overall amount of waste generated in the City going forward.

Do the policies give clear direction as to how a decision maker should react to a development proposal?

The City Corporation considers that CP policies (S16) and (CE1 and CE2) are, in accordance with Paragraph 16 of the NPPF, which requires that they are ‘clearly written and unambiguous’ and drafted in such a manner that it is ‘evident how a decision maker should react to development proposals’.

The circular economy and waste policies are positively worded, are clear where thresholds apply, and clearly separate the policy from the supporting text which is divided into ‘Reason for the policy’ and ‘How the policy works’, for maximum clarity.

CP paragraph (13.6.2) acknowledges the threshold amount of waste that the London Plan expects the City to provide sufficient capacity for (i.e 90,000 tonnes of waste annually by 2041) . This figure represents the City’s contribution to meeting the Mayor’s target of 100% net self-sufficiency in the management of London’s household and commercial and industrial waste from 2026.

CP paragraph (13.6.11) states that the City Corporation will continue to safeguard Walbrook Wharf as a waste site and river wharf in line with the London Plan and the safeguarded wharves direction. Any proposed development that would prejudice the operation of the existing safeguarded waste site at Walbrook Wharf will be refused.

Pre-application consultation on suitable waste treatment, storage and collection facilities is encouraged and the level of detail required at the planning application stage will be proportionate to the scale of development, paragraph (13.6.12).

CP paragraph (13.6.13) advises that the environmental statement (for EIA applications) or sustainability statement should provide an assessment of on-site waste treatment options and quantities of residual waste likely to arise from the site.

The City Corporation recognises the importance of continuing to monitor the quantities and types of waste originating in the City and working with the City’s communities to minimise this waste, applying circular economy principles to design out waste and pollution and keeping products and materials in use, paragraph (13.6.8).