Note to examination of ELJWP regarding London self-sufficiency status

Purpose

During the hearings associated with the examination of the ELJWP, the GLA representative stated that London was 60% net self sufficient. The East London Boroughs' (ELBs) representative stated they believed that London was close to, if not already achieving net self sufficiency, in HIC waste management capacity. Given the state of net self sufficiency is important to whether/when the provisions of Paragraph 9.9.3 of the London Plan might take effect and this in turn the effectiveness of JWP2B2, this note has been produced to clarify the position for the Inspectors.

Context

The proposed inclusion of clause B2 in Policy JWP2 has been the focus of representations from the GLA. This reads as follows:

B. Development that would lead to the loss of capacity and/or constrain current operations of a safeguarded waste site or future committed operations subject to an active planning permission[52] will not be permitted unless:

...

2. it has been demonstrated that the capacity of the facility to be lost would not compromise the ability of London to meet the London Plan objective of net self sufficiency for London as a whole.

The London Plan 2021

JWP B2. drew upon Paragraph 9.9.3 of the London Plan as follows:

"*9.9.3 Policy SI 8 Waste capacity and net waste self-sufficiency promotes* ***capacity increases at waste sites*** *where appropriate to maximise their use. If such increases are implemented over the Plan period, it may be possible to justify the release of waste sites if it can be demonstrated that there is sufficient capacity available elsewhere in London at appropriate sites over the Plan period to meet apportionment and that the target of achieving net self-sufficiency is not compromised. In such cases, sites could be released for other land uses. (emphasis added)* "

This seeks to support Policy SI8 of the London Plan 2021 which states:

A In order to manage London's waste sustainably:

1) the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026

Paragraph 9.8.1 of the London Plan states that: "*In 2015, London managed 7.5mt of its own waste and exported 11.4mt of waste. London also imported 3.6mt of waste. This gives London a current waste* ***net self-sufficiency figure*** *of approximately 60 per cent*." Hence the value cited by the GLA at the hearing must have been based on the 2015 value that appeared in the London Plan (2021) and not an up to date value.

A review of WDI 2024 data shows the following position wrt net self sufficiency for waste management capacity for London as a whole. It has been conducted by principal waste stream and management route to bring a greater degree of granularity that offers more insight as to how waste is being managed.

HIC Waste

Table 1: HIC Waste Managed in London vs London HIC Waste
Source: Environment Agency WDI 2024

	Final fate facilities			Intermediate facilities				
	Incineration	Landfill	On/In Land	MRS	Transfer	Treatment	Use of Waste	Totals
London HIC managed in London	2,021,188	499,255	0	406,163	2,890,712	1,697,379	0	**7,514,697**
London HIC managed outside London	747,704[1]	742,276	160	90,597	387,127	1,397,903	3,503	**3,369,271**
HIC from elsewhere managed in London	228,557	171,597	0	173,082	872,990	1,036,386	0	**2,482,612**

To calculate net self sufficiency

1. Add 'London HIC managed in London' and 'London HIC managed outside London' values to give total amount of HIC waste from London managed at permitted facilities (noting that there will be significant degree of double counting between the tonnages managed at the intermediate facilities and the final fate facilities meaning the quantities of waste attributed to London will be artificially inflated) =**10,883,967t total HIC waste from London**
2. Add 'London HIC managed in London' to 'HIC from elsewhere managed in London' values to give a total of **9,997,309 tonnes of HIC waste managed in London.**
3. Divide 'total HIC waste managed in London' by 'total HIC waste from London' to give **HIC waste % net self sufficiency = 92%.**

Note that the extension to Belvedere Incinerator in LB Bexley granted a DCO (Riverside 2) is undergoing construction at the time of writing. This will add a further c.650,000tpa of incineration capacity (plus 40,000tpa of anaerobic digestion capacity) virtually cancelling out the export to incineration shown in Table above. It is notable that the GLA objected to the DCO at the time, partly on the basis that it considered there to be no need for the proposed ERF to manage London's residual waste[2], so the fact that the facility now actually exists, may be taken to show there is more than enough residual waste management capacity in London which in this case contributes both towards the apportionment as qualifying capacity, and net self sufficiency.

[1] Including 230,000t LACW to S Gloucs from west London under contract. Note the draft WLWP has established west London has sufficient capacity to manage its apportionment, hence compensating for the export from its area.

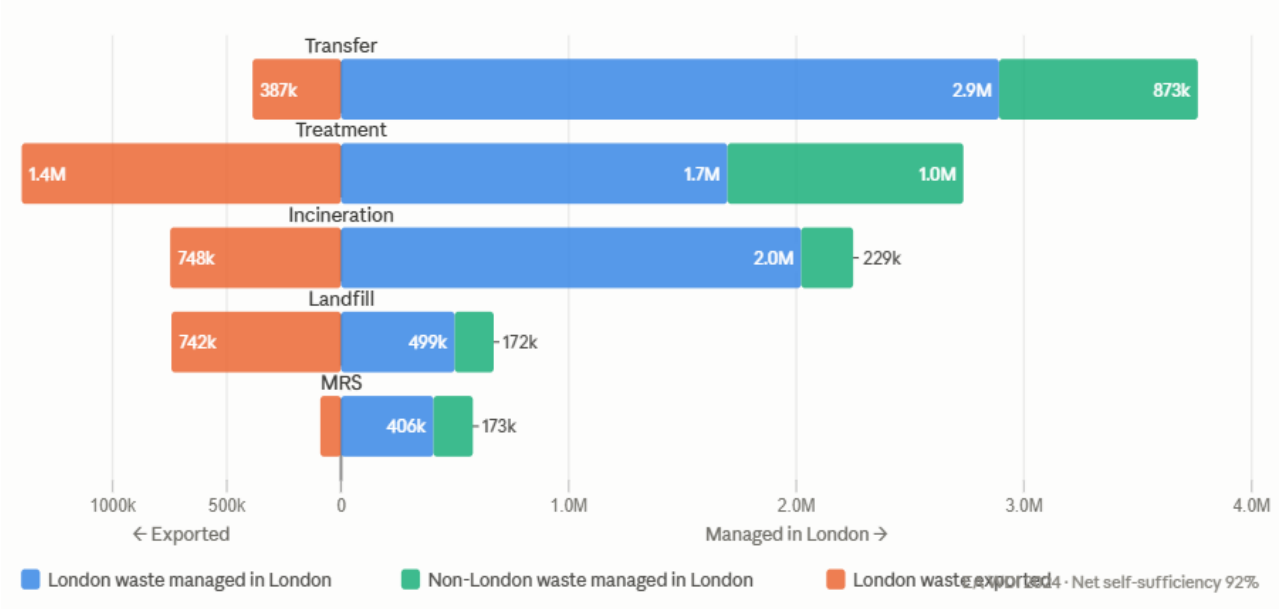
[2] See https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010093

The London HIC Waste net self sufficiency balance for 2024 is illustrated in Figure 1 below:

Figure 1: London HIC waste management balance 2024

Source Table 1

London waste exported to left (amber) and managed in London to right



C&D Waste[3]

	Final fate facilities			Intermediate facilities			
	Incineration	Landfill	On/In Land	MRS	Transfer	Treatment	Totals
London C&D waste managed in London	3,117	813	0	145,047	1,623,788	2,566,207	**4,338,972**
London C&D waste managed outside London	53,178	140,670	1,944	22,594	221,552	685,301	**1,125,239**
C&D waste from elsewhere managed in London	8	203,782	99,759	44,189	615,661	560,857	**1,524,257**

To calculate net self sufficiency

1. Add ‘London C&D waste managed in London’ and ‘London C&D waste managed outside London’ values to give total amount of C&D waste from London managed at permitted facilities (noting that there will be significant degree of double counting between the tonnages managed at the intermediate facilities and the final fate facilities meaning the quantities of waste attributed to London will be artificially inflated) =**5,863,228t total C&D waste from London**

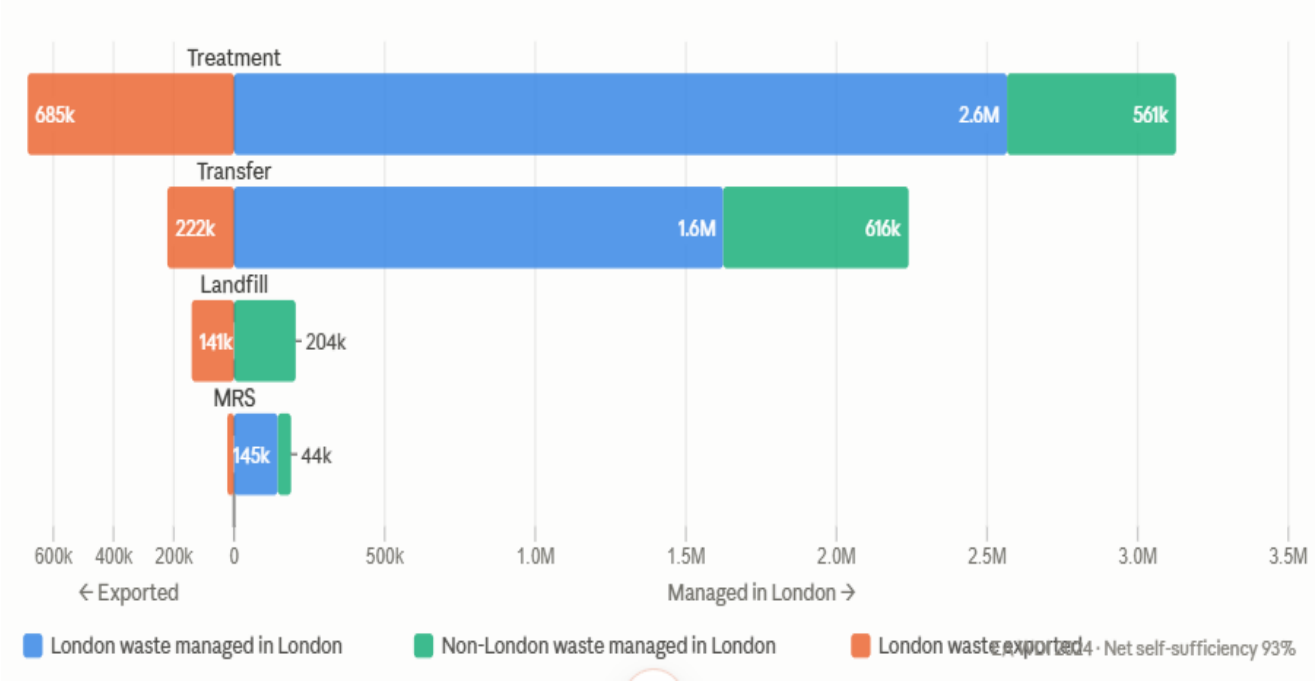
2. Add ‘London HIC managed in London’ to ‘HIC from elsewhere managed in London’ values to give a total of **5,464,210 tonnes of C&D waste managed in London.**

3. Divide 'total C&D waste managed in London' by 'total C&D waste from London' to give **C&D waste % net self sufficiency = 93%.**

[3] Excavation waste from London excluded as that is not subject to net self sufficiency target as stated at Para 9.8.1 London Plan (2021)

The London C&D Waste net self sufficiency balance for 2024 is illustrated in Figure 2 below:

Figure 2: London C&D waste management balance 2024
Source Table 2
London waste exported to left (amber) and managed in London to right



Conclusion

A review of the best available data in the Environment Agency WDI on actual inputs of HIC waste and C&D waste from London managed at permitted waste facilities within and outside London, plus tonnages of these wastes from outside London managed at facilities in London indicates that **London is close to achieving net self sufficiency in both HIC waste management capacity and C&D waste management capacity.**

It should be noted that net self sufficiency would normally be measured by comparing the tonnage of waste produced in a Plan area against the notional capacity of facilities within a Plan area. To be net self sufficient, the notional capacity of facilities would be expected to be equal to or greater than the actual tonnage of waste reported as managed in a particular year. Hence it is highly likely that net self sufficiency had already been achieved across London as a whole, some two years in advance of the London Plan target. Therefore there is a reasonable expectation that the release clause of Para 9.9.3 may be engaged without the need for capacity at the existing waste site estate actually having to increase.