

Comments on the Mayor's Draft Municipal Waste Management Strategy

1. Introduction

The London Sustainable Development Commission was set by the Mayor in 2002 to advise him on sustainability issues in London. Further details on the Commission can be found on the GLA website www.london.gov.uk

2. Methodology

In keeping with other English regions the Commission is developing a London Sustainable Development Framework. A draft Framework has been developed that contains a vision and set of high level objectives aimed at moving London towards a more sustainable future (attached as appendix 1). It is hoped that the Framework will be agreed by Summer 2003 following consultation early in Spring.

The Commission has used this draft Framework as a means of commenting on the draft Waste strategy -see Section 4, below. Section 3 sets out a summary of the Commission's main comments drawn from the Framework appraisal.

3. Summary of Commission comments

Aims and general comments

1. The Mayor's Waste Strategy demonstrates the kind of virtuous cycle required by the new sustainable development agenda. It should score strongly on economic, social and environmental issues and produce across-the-board benefits (e.g. new jobs, reduction in imports, creation of new raw materials, reduction in use of natural resources, cleaner environment and so on). Whilst the policies and proposals contained in the draft Strategy will no doubt contribute to this sustainability agenda, particularly on the environmental side, it could go further in relation to social and economic aspects.

2. We strongly welcome the long-term aspirations of the Strategy in seeking a 'waste minimisation and recycling-led' future. But in concentrating more on an operational plan up to 2005, the document becomes less of a strategic plan. The draft Strategy fails to confidently identify a best practice environmental solution to London's waste problems that will meet EU and national targets (none of the four scenarios considered in section 2 are designed to meet the EU Landfill Directive¹).

¹ Only scenario 3 meets the EU Landfill target on the assumption of 1% growth in waste – it is currently rising by 5% per year in London and 3% nationally.

3. The Strategy justifies the Mayor's policy on 'no new mass-burn incineration in the short term'. However, there is the possibility that incineration may be required to play an increased role in a Best Practice Environmental Option for London – this is not fully explored in the draft Strategy and we recommend that the role of incineration is at least kept under review.

4. The strategy could go much further in emphasising waste minimisation as the primary goal (the first choice in the waste management hierarchy). Currently the main message focuses more on recycling (overcoming barriers, creating new markets, meeting targets). London needs a more robust approach to minimisation – for example setting minimisation targets to sit alongside recycling targets, as well as supporting the shift from *goods* to *services* that would potentially underpin minimisation. Minimisation is fundamental in London – whilst we may be able to significantly increase our recycling rates, increases in waste produced (e.g. through population growth) would still mean that landfill pressures remain as high as ever. Therefore, the Strategy should be clear in targeting waste minimisation first and foremost. Currently it appears to group minimisation and recycling together as its aim, with much more policy and action targeted at recycling initiatives.

5. The overriding push for recycling and the scale of the challenge to be overcome in seeking to meet national and EU targets raises some concerns.

- The scale of the required changes needed to meet the higher recycling and composting targets will mean that substantial extra resources will be needed. Boroughs will bear the brunt of expectation and policy instruction – they are understandably concerned about their ability to meet the new targets. The Strategy needs to include an assessment of how much it will cost the boroughs in terms of implementation of its policies and proposals. Clearly the GLA needs to develop a high profile role in waste education and promotion in London with all sectors – this is crucial to delivering change and implementing the Strategy. Such campaigns will require a considerable proportion of any extra funding;
- Whether the Strategy really does provide the robust, strategic framework for addressing these challenges – in terms of the options, facilities, programming and funding required – and if it fails to deliver on its challenging recycling targets will London still be reliant on landfill?
- In the short term, the recycling priority may limit the choices available to local communities to become more self sufficient, e.g. the promotion of a small-scale waste incineration plant linked to a local heat distribution network. Whilst the Strategy is clear on its policies relating to mass burn incineration, it is less clear on smaller schemes, with policy 19 presumably allowing for new incineration technology, providing that it meets various requirements (including provision of Combined Heat and Power). The Strategy needs to be clearer on local incineration schemes and how these relate to the promotion of Combined Heat and Power schemes in London;

6. The Strategy is very public sector led: it is comparatively weak on engaging all of London's waste actors beyond the public sector and waste authorities. The GLA has a crucial *catalytic* role to play in ensuring that the full range of actors provides waste education and promotion rather than emphasising its own public sector focussed promotional role.

Strategic Waste Planning in London

7. There is some debate over the idea of a single Waste Disposal Authority (WDA) for London, with concerns about the time-scales for legislative change that this might entail and the transference of responsibilities away from the boroughs/ existing arrangements. However, we strongly support a more strategic approach to managing London's waste and see a single WDA as a possible mechanism to achieve this objective. We fully appreciate that some boroughs have concerns about a single WDA and welcome the proposal for further consultation on this issue.

8. It is essential that the strategy considers all options for future waste management *within the imperative of meeting national and international targets*. The section on 'guessing the future' (pages 46 to 57) attempts to do this, but would have been more helpful in setting a clear strategy for London *if the majority of scenarios actually met the EU Landfill targets*. Adopting this approach would have provided combinations of waste management options, which meet the targets – leading to a clear strategy defining which was the most appropriate for London. Instead, we are left with rather less helpful combinations that don't meet the targets. This is in contrast with neighbouring regions (EERA and SEERA) whose strategies look at scenarios that meet targets, with SEERA identifying a preferred option (BPEO) based on a mixture of scenarios.

9. The Strategy needs to take due account of the development of the East of England (EERA) and South East (SEERA) waste strategies and their policies. Proposal 84 states that the Mayor will work with neighbouring Regional Assemblies to co-ordinate strategic waste management. Whilst the three strategies are mutually reinforcing to some degree, there are some differences in policy and approach. For example, neither EERA nor SEERA limit future scenarios by discriminating against options such as large-scale incineration.

10. Guidance to London boroughs over Unitary Development Plan (UDP) preparation is vague on the issue of the location or possible clustering of *strategic* waste facilities. Para 4S.10 of the Strategy states that the London Plan is required to evaluate the adequacy of existing strategically important waste management and disposal facilities to meet London's needs and to identify opportunities to locate these facilities: however no such analysis or locational opportunities appears in the draft London Plan. With an increasing population, a restricted land area and an identified need for more waste management facilities, there will undoubtedly be competing pressures over land use – which could threaten green spaces and leisure/sporting/cultural resources. Boroughs are asked to make land available – and perhaps more guidance will be forthcoming in the proposed Supplementary Planning Guidance on waste.

Equalities and participation

11. The Strategy is strong on the economic and environmental aspects of sustainability, but weaker on social issues. Aspects of equalities and tackling social exclusion are minimal and 'people-focussed' issues are lost in the overbearing wealth of technical data. For example, the Strategy is comparatively weak on civic participation. Policy 48 refers to involving local communities in waste planning, yet the supporting proposals (81 to 84) fail to address this issue. Although there is a section on equalities beginning 3.68, none of the actual proposals refer specifically to equalities or taking the needs of

specific groups into account. Without the necessary proposals to sufficiently involve local communities, the assumption would remain that it will be the existing poor and disenfranchised who will be most adversely affected by proposals for waste management facilities.

New recycling industries and jobs

12. There is very little on the skills needs of the wider waste sector: proposals on skills relate only to the expected needs of the future reprocessing sector. See also point 16 on professional development.

13. Creating markets for recycled products is key to deliver on recycling. We need to overcome the barriers to consumer and private sector involvement in this process (e.g. high entry costs and modest returns): public sector intervention is necessary - the Mayor's Green Procurement Code and the work of London ReMade are welcome beginnings in this respect and these two initiatives need to be promoted vigorously and the scope of operations widened (see 20, below). We need to convince all consumers that products made from recycled materials are as good as those made from raw materials and that costs can be comparable.

14. Section 4Q, 'Developing market demand and economic solutions', rightly addresses the market aspects of the waste sector but misses an opportunity to look at how the new waste management agenda may be best harnessed to tackle social exclusion problems. An analysis of the types of jobs that may be created in the new recycling-led waste sector would be useful, together with an indication of where these may be located. Whether justified or not, there is a view that East London could become the focus of London's recycling/reprocessing industry (possibly due to the relative amount of brownfield and 'cheaper' land available). This is alluded to in para. 4S.6, yet the Strategy appears to leave these matters for the proposed 'markets taskforce' (proposal 76). Again, with its market focus, is this the right mechanism to promote social inclusion through the waste sector?

Promotion, education and encouragement of waste minimisation and recycling

15. As stated above, the GLA clearly needs to develop a high profile role in waste education and promotion in London - this is crucial to delivering change and implementing the Strategy. However, this should be broader than the public sector-led approach currently proposed. The Strategy needs to reach all the players and ensure that they all play their full part in promotional and educational campaigns. For instance, the voluntary and community sector are already major facilitators of the second-hand market and there is potential for this to grow. Businesses should be a major source of information for customers and employees. A more ambitious, radical educational/promotional campaign that engaged the breadth of London's economy (e.g. petrol stations, supermarkets and charity shops) as equal partners could well be more effective than a purely public sector-led campaign.

16. There is a need for the whole range of professionals involved in shaping the urban environment to understand their responsibilities in relation to waste minimisation, recycling, resource efficiency, the inclusion of these criteria in designs, plans, procurement policies and so on. The Strategy should recommend that all professionals should develop an understanding of sustainable development principles and current thinking relating to sustainable development solutions in their field during their initial

professional education. This should be mandatory and a requirement of professional status and should be progressed and updated through continuing professional development. With the majority of professional bodies residing in London, this is an area where the Mayor could be of influence.

17. One area where the GLA needs to act as a catalyst for action is in relation to waste minimisation. Proposal 13 is welcomed in this respect – a high profile campaign with manufacturers, retailers and consumers will be essential if the Waste Strategy aims are to be met.

18. We welcome recognition in the Strategy that fiscal instruments of some sort will be needed to raise recycling rates in the future. Such incentives (such as local authority charging schemes for domestic waste) should include appropriate rebates and deposit-refund schemes and should be assessed for their impact on all social groups and on the achievement of social inclusion objectives. However, we need to be sure that the introduction of any charging scheme would not jeopardise other waste objectives (e.g. result in increased fly-tipping).

19. London may wish to follow the South East Region, where a SE Waste Best Value Network brings together Local Authorities to share best practice and promote key regional messages.

20. We particularly welcome policy 47 and proposal 79 which instruct functional bodies, London boroughs and waste authorities to develop an appropriate environmental policy to embrace green procurement. However, it is crucial that such policies go wider than the issues dealt with by the Mayor's Green Procurement Code. Environment policy and *sustainable* procurement must address issues beyond developing markets for recycled products – and embrace issues like the promotion of use of renewable energy, obtaining of products from sustainable sources (e.g. timber) and so on. It is important that the GLA group (GLA, LDA, TfL, MPA, LFEPA) standardises its approach to sustainable procurement in this way and maximises its purchasing powers to achieve sustainable development. It is not clear how proposal 79 will be implemented. One option would be to expand the Mayor's Green Procurement Code.

Waste management options

21. The Strategy relies on data from the national Waste Strategy 2000 (Appendix B, reproduced as table 26 on page 120 of the strategy) on the external environmental costs and benefits of different waste options. Whilst this is useful as a general indicative guide, the study it is based upon (Coopers and Lybrand 1997) has its limitations (e.g. estimates omit some of the environmental costs of processing for recycling). It would be preferable if the Strategy could commission new research specifically looking at the costs of different waste management options for London, looking at different parts of London, and looking at environmental, social (e.g. health) and economic costs. We recommend such an approach.

22. We particularly support the strategy's examination of new technologies beyond high temperature techniques like gasification and pyrolysis, such as mechanical-biological treatment.

Good practice

23. We welcome the examples of good practice highlighted at various points throughout the strategy – many drawn from innovative schemes in London boroughs. One omission is the work of the ECT Group – the UK's largest community recycling organisation that started life as a small voluntary body in Ealing. This is a good example for sustainable development – creating local employment, offering local services and delivering environmental improvement – all based on community needs. This example could provide a useful addition to the strategy. Perhaps the diversity of good practice in London could be drawn together in a single place (if this has not already happened).

Monitoring

24. In terms of monitoring the strategy, the City Limits style mass balance/ecological footprint approach could have benefits in terms of education and awareness raising. The strategy would benefit from a summary table of indicators or key performance measures it will be monitored against.

4. Framework appraisal

The following section uses the Commission's draft London Sustainable Development Framework to appraise the draft Strategy.

Overall objective: We will achieve environmental, social and economic development simultaneously. The improvement of one will not be at the detriment of another. Where trade offs between competing objectives are unavoidable, these will be transparent and minimised.

Effective waste management policy has the potential to demonstrate the kind of virtuous cycle required by sustainable development. It should score strongly on economic, social and environmental criteria and produce across the board benefits (new jobs, reduction in imports, creation of new raw materials, reduction in use of natural resources, cleaner environment and so on).

The Strategy is particularly strong on the environmental aspects of sustainability, but weaker on economic and social issues. Aspects of equalities and tackling social exclusion are minimal and 'people-focussed' issues are lost in the overbearing wealth of technical data.

A useful tool to attempt to move forward on all three fronts is presented in proposal 96 – where waste authorities are requested to “*fully consider the social, environmental and economic benefits when undertaking Best Value reviews of waste management services*”. The Best Practicable Environmental Option (BPEO) is advocated but could be developed to link in with social impact testing and economic modelling.

In general, the Strategy is very open in terms of waste management options and admits that the benefits of pursuing an aspirational waste minimisation and recycling-led approach substantially outweigh any short-term benefits of alternative options. However, this results in a less clear long-term strategy for London.

Taking responsibility

1. As citizens of a world city, we will be aware of the impact of our actions on the rest of the UK and beyond, and will take a responsible world leadership role which contributes to the planet's sustainability.

The thrust of the Strategy is to move towards a responsible 21st century approach to waste management, by changing lifestyles so that not only do we produce the minimum amount of waste, but our chosen waste management options reduce our impact on the local and global environment.

The Strategy is built around the problem of tackling London's export of waste outside its boundaries: although it directs London to become more self-sufficient in dealing with its waste, it recognises that this may be difficult in the short term due to the time needed to raise recycling rates (the priority management option) and develop the necessary mechanisms.

The strategy should take account of the development of East of England (EERA) and South East (SEERA) waste strategies and their policies. Proposal 84 states that the Mayor will work with neighbouring Regional Assemblies to co-ordinate strategic waste

management – whilst these may be mutually dependent in some respects, there are differences in approach. For example, SEERA discusses 6 main waste management scenarios, all of which meet national targets. For each scenario, the implications of capacity being provided by only small-scale or large-scale facilities was appraised (giving 12 options). All waste management options were considered and there was no presumption against large incinerators. In identifying a preferred option, it was concluded that a mixture of 3 of the 12 options was the BPEO, mainly drawn from options that involved large facilities. The London approach appears far less helpful – our scenarios are not geared to meeting EU Landfill targets for instance.

In terms of monitoring the strategy, the City Limits style mass balance/ecological footprint approach could have benefits in terms of education and awareness raising. The strategy would benefit from a summary table of indicators or key performance measures it will be monitored against.

Various policies and proposals are aimed at London leading by example – e.g. green procurement and developing markets for recycled products (46 and 47)

The introduction of the Capital Standard for London's streets (prop 43) will have an influence on London's image as an exemplar sustainable city.

2.All of us - individuals, households, businesses, local and regional government, voluntary groups — will have the information, knowledge, motivation and support to help us to take both short and longer-term decisions that will make us and our city more sustainable.

The Strategy contains a variety of policies and proposals concerned with the provision of information on waste issues, or educational and promotional initiatives. These include:

- A London campaign as part of National Waste Awareness Initiative, particularly aimed at young people (policy 44, proposal 66)
- Commitment to develop a waste minimisation programme – create an environment for change through communication/campaigning (proposal 13) awareness raising with public (proposal 14)
- Promote a programme aimed at enhancing Civic Amenity sites and rebranding as Reuse and Recycling centres (policy 27), including the development of a best practice design brief
- Commitment to lobby Government for legislative and other changes to achieve even higher rates of recycling and composting
- Introduces waste data base – capitalwastefacts web site
- Committing waste authorities to action on education and promotion

Clearly the GLA needs to develop a high profile role in waste education and promotion in London – this is crucial to delivering change and implementing the Strategy.

Policy 70 specifically seeks to address the business support needs of the waste reprocessing sector, including skills requirements. The markets task force (proposal 76) will also consider the requirements in terms of current and future reprocessing. Both these are focussed on the skills needs of reprocessing – there is nothing on the skills needs of the wider waste sector, nor on professional development of non-waste professionals who shape the urban environment.

The Strategy also addresses issues around barriers and constraints (see objective 3, below) and contains numerous content on fiscal instruments (Section 4X, e.g. policies 55 and 56), including the new London Recycling Fund (proposal 90). The Strategy recognises the need to incentivise increases in waste minimisation and recycling: this should include further investigation of local authority charging schemes (including rebates, deposit-refund schemes). Lobbying for new legislation and clarification on existing legislation is also addressed.

In addition, London may wish to follow the South East Region, where a SE Waste Best Value Network brings together Local Authorities to share best practice and promote key regional messages.

The Strategy concentrates primarily on educating/influencing the public sector, the waste industry, and (to a lesser extent) citizens. However, it could do far more in relation to the provision of support for individuals and households to move up the waste hierarchy. But the Strategy needs to do more on educating other sectors, in particular, the business sector and professional bodies.

There is a need for the whole range of professionals involved in shaping the urban environment to understand their responsibilities in relation to waste minimisation, recycling, resource efficiency, the inclusion of these criteria in designs, plans, procurement policies and so on. The Strategy should recommend that all professionals should develop an understanding of sustainable development principles and current thinking relating to sustainable development solutions in their field during their initial professional education. This should be mandatory and a requirement of professional status and should be progressed and updated through continuing professional development. With the majority of professional bodies residing in London, this is an area where the Mayor could be of influence.

3. We will seek new and creative ways to overcome the constraints of time and money that prevent us from taking effective decisions. We will ensure that these decisions are informed by a long-term perspective.

The Strategy pays attention to the funding aspects of delivery as well as fiscal instruments required to achieve change. It also contains numerous policies aimed at making sustainable waste management options more convenient for people (e.g. making recycling centres available free of charge to all Londoners (policy 27). Specific proposals concern new studies looking at the barriers to sustainable waste management (policy 56). The long-term perspective is key to the strategy, both in terms of future scenarios and targets, and also seeking to ensure better spatial planning for waste (e.g. boroughs asked to ensure adequate land for waste facilities in forward plans).

The Strategy is founded on fundamental changes to the way we live and deal with waste. It admits that extra resources are required and goes some way to addressing this shortfall, whether through new initiatives (exploring fiscal measures or the creation of the London Recycling Fund), targeting how boroughs spend their own funding (proposal 91) or lobbying government (proposal 92). However, the scale of the required changes will mean that substantial extra resources are made available if the aspirational aims of the Strategy are to be delivered. Boroughs will bear the brunt of expectation and policy instruction – they are understandably concerned about their ability to meet the new targets. There is no assessment of how much it will cost the boroughs in terms

of implementation of its policies and proposals. Educational and promotional campaigns will require a considerable proportion of any extra funding.

There is some debate over the idea of a single Waste Disposal Authority (WDA) for London, with concerns about the time-scales for legislative change that this might entail. However, a single WDA is a possible mechanism for achieving a strategic approach to waste management in London. The Strategy proposes further consultation on a single WDA - this should enable boroughs and others to voice their concerns.

4. We will build and sustain a powerful sense of ownership and responsibility for our city, with civic participation as the norm.

The Strategy is comparatively weak on civic participation. Policy 48 refers to involving local communities in waste planning, yet the supporting proposals (81 to 84) fail to address this issue. Participation is seen to be more important in terms of people taking part in recycling schemes, rather than promoting the concept of participatory decision-making. This may lead to the poorer and most disenfranchised being most adversely affected by proposals for new waste management facilities.

Developing respect

5. Our city will have a culture of tolerance, fairness and respect, not only recognising London's diversity as its key strength, but also embracing nature. The right of all London's citizens and communities to pursue fulfilment will be assured, so long as this does not infringe the rights of others.

Although there is a section on equalities beginning 3.68, none of the actual proposals refer specifically to equalities or taking the needs of specific groups into account. For instance, the first bullet point in para. 3.70 refers to the need to make waste and recycling services accessible to all ("*they must take account of people who are unable to carry waste or recycling to a specified collection point, including older people and disabled people*") this important theme is not picked up as a proposal. Many of the bullet points in para. 3.70 are not reflected in later policies or proposals. Similarly, the points flagged on ethnicity in paras. 3.73 and 3.74 don't appear to find any outlet in the proposals.

Similarly, the text on equalities on page 252, primarily about environmental justice issues regarding the location of facilities is not dealt with by the associated policies and proposals on page 253.

Again, the end result may be that the poorer and most disenfranchised are most adversely affected by proposals for new waste management facilities.

6. Our city will be a place where everyone feels at ease and is able to enjoy life. All who work, live and play in the city will be able to pursue their objectives in peace, free from the threat of crime, violence or intrusion.

The Strategy aims to create convenient and safe access to waste management facilities, for example convenient and safe pedestrian access to Recycling Centres, policy 28. In addition, the major initiative on London's litter, Capital Standard (policy 32) will contribute to the feeling of increased security (stemming from a more cared-for urban

environment) and will tackle specific environmental crime in terms of illegal dumping of waste.

The Strategy also contains policies aimed at dealing with various dangerous wastes, particularly hazardous waste (policy 39), PHBs (policy 42) and clinical waste (policy 43).

7. Our communities will be dynamic, stable, adaptable, innovative, progressive – creating a city in which conflicts will be resolved as part of a transparent and participatory process.

In theory, the Strategy should offer communities greater choice in terms of waste management options, with the emphasis on Best Practicable Environmental Option and the potential for greater self-sufficiency for communities.

The overriding push for recycling may curtail the choices available to local communities and lead to them becoming less self-sufficient, at least in the short term. An example would be of a local community who wish to develop a small-scale waste incineration plant linked to a local heat distribution network. Not only would this provide heat to the area, it would also reduce the transport of waste and energy costs associated with transport and reprocessing. Whilst the Strategy is clear on its policies relating to mass burn incineration (presume against any increase in capacity), it is less clear on smaller schemes, with policy 19 presumably allowing for new incineration technology, providing that it meets various requirements (including provision of Combined Heat and Power).

The Strategy is comparatively weak on participatory processes and the degree to which local communities will be involved in local waste management decisions and how they may influence decisions – see comments on objective 4.

Conserving resources

8. We will protect and improve the city's natural ecosystems, its biodiversity, its open spaces and its built environment. We will help to protect the wider regional, national and international environments with which London has links.

The Strategy has little specific to say on biodiversity, open spaces and the built environment. However, in promoting the Best Practicable Environmental Option (policy 5) and seeking to minimise the environmental impacts from waste transportation (policies 49 and 50), the Strategy will help to protect not only London's environment, but also that of adjacent regions. The environment in neighbouring regions should benefit from London's greater self-sufficiency in waste management. The promotion of waste wood for fuel (proposal 34) will contribute to the sustainable management of London's trees and woodlands.

However, in increasing waste management options and instructing boroughs to allocate land for new waste management facilities, the Strategy may create conflict between land uses and pressure for development on open spaces and wildlife habitats.

9. We will limit and deal with our pollution, and use energy and material resources prudently, efficiently and effectively, including re-using and recycling our residual waste.

The Strategy evidently scores highly in addressing this objective, but could be improved.

The scenario testing work in the Strategy demonstrates the extent of the problem in dealing with London's waste and putting in place policies, which will meet national (National Waste Strategy) and European (EU Landfill Directive) targets. To meet both sets of targets, the draft Strategy requires recycling and composting rates much higher than recommended by government – and appropriate legislative changes in order to do so. Increased capacity in mass-burn incineration is ruled out at least in the short term. This constrains London's options more so than adjacent regions and the option for increased incineration should at least be kept under review. The Strategy could be clearer in setting a best practice option for London's future. It is not clear if scenarios 2,3 and 4 are based on the London Plan's increased population projections – we suspect they are not – which would make matters worse.

Policy 2 states that *“the Mayor believes that higher targets could be achieved in the longer term ... to achieve rates of recycling and composting of municipal waste of 50% by 2010 and 60% by 2015”*. This is commendable, given nature of the situation, but the Strategy needs to do more to convince others, particularly London boroughs, how such high rates could be achieved, including more detail on delivery and funding.

The Strategy relies on data from the national Waste Strategy 2000 (Appendix B, reproduced as table 26 on page 120 of the strategy) on the external environmental costs and benefits of different waste options. Whilst this is useful as a general indicative guide, the study it is based upon (Coopers and Lybrand 1997) has its limitations (e.g. estimates omit some of the environmental costs of processing for recycling). It would be preferable if the Strategy could commission new research specifically looking at the costs of different waste management options for London, looking at different parts of London, and looking at environmental, social (e.g. health) and economic costs. We recommend such an approach.

Getting results

10. We will make consistent economic progress – not necessarily always growth – to enable wider economic, social and environmental objectives to be pursued both in London and beyond. Business transactions in London will be conducted to high ethical standards.

The waste sector is an important element in London's developing environmental or green business sector and various policies in the Strategy relate to joint working with the London Development Agency (LDA) to make the most of new business opportunities and job creation (policy 45), further support for London ReMade (proposal 71), stimulate greater demand for recycled products and related industries (proposal 74) and the creation of a market task force (proposal 76).

The waste sector is often touted as a good example of the kind of virtuous cycle demanded by sustainable development. Bolstering the waste sector, say in terms of greater recycling and reprocessing facilities in London, will create jobs and business opportunities, tackle social exclusion in targeted areas and help improve the environment.

Section 4Q, 'Developing market demand and economic solutions', in concentrating more on the market aspects of the waste sector misses an opportunity to look at how the new waste management agenda may be best harnessed to tackle social exclusion

problems. An analysis of the types of jobs that may be created in the new recycling-led waste sector would be useful, together with an indication of where these may be located. Whether justified or not, there is a view that East London could become the focus of London's recycling/reprocessing industry (possibly due to the relative amount of brownfield and 'cheaper' land available). This is alluded to in para. 45.6, yet the Strategy appears to leave these matters for the proposed 'markets taskforce' (proposal 76). Again, with its market focus, is this the right mechanism to promote social inclusion through the waste sector?

Similarly, guidance to London boroughs over Unitary Development Plan (UDP) preparation is vague on the issue of the location or possible clustering of *strategic* waste facilities. Para 45.10 of the Strategy states that the London Plan is required to evaluate the adequacy of existing strategically important waste management and disposal facilities to meet London's needs and to identify opportunities to locate these facilities: however no such analysis or locational opportunities appears in the draft London Plan.

The Strategy does contribute to the promotion of higher ethical standards within the business sector. The significant emphasis on developing markets for recycled products in London and in particular the promotion of the Mayor's Green Procurement Code will make an important contribution: policies 46 and 47 and proposals 77 to 80 will improve procurement and environmental policy within London's businesses. However, there is scope for the Mayor's Green Procurement Code to be expanded to include more aspects of sustainable procurement.

11.All the different parts of our economy will consistently invest in new technologies, new solutions, new plans and new ideas that contribute to achieving social, economic and environmental objectives simultaneously.

The Strategy is strong on promotion of new technologies and solutions, most of which will deliver benefits across the three aspects of sustainability. We particularly support the strategy's examination of new technologies beyond high temperature techniques like gasification and pyrolysis, such as mechanical-biological treatment. The business sector and waste authorities are particularly targeted, together with commitments to lead by example within the GLA group.

We particularly welcome policy 47 and proposal 79 which instruct functional bodies, London boroughs and waste authorities to develop an appropriate environmental policy to embrace green procurement. However, it is crucial that such policies go wider than the issues currently dealt with by the Mayor's Green Procurement Code. Environment policy and *sustainable* procurement must address issues beyond developing markets for recycled products – and embrace issues like the promotion of use of renewable energy, obtaining of products from sustainable sources (e.g. timber) and so on. It is important that the GLA group (GLA, LDA, TfL, MPA, LFEPA) standardises its approach to sustainable procurement in this way and maximises its purchasing powers to achieve sustainable development. As stated in 10 above, one option of achieving proposal 79 would be to expand the current remit of the Mayor's Green Procurement Code.

12.All forms of work will be recognised and valued. Paid employment will be plentiful.

The development of the waste management sector as described in the Strategy would no doubt contribute to the provision of employment in London. However, as stated in

our response on objective 10, above, the Strategy is rather weak on looking in more detail at the nature of 'jobs from waste' and how they can be best harnessed to tackle social exclusion and strengthen communities.

The time and effort needed for households to sort their waste for recycling, so vital for the success of the Strategy, can be viewed as additional unpaid work. This should be valued – for instance in promotional campaigns – and by consideration of possible incentives (e.g. council tax or charging rebates).

13. We will be healthy and fulfilled – through living in good housing, with wide opportunities to develop as individuals and communities, through access to services, good quality food, green space and cultural, sporting and leisure activities.

This objective covers a number of issues, but relates essentially to health and easy access to a range of basic needs and services, e.g. recycling centres available free of charge to all Londoners (policy 27), with convenient and safe pedestrian access (policy 28). In general, the Strategy scores well on this objective as it seeks to promote a range of waste management options and make these convenient and easy to access. There is a degree of promotion of mixed-use development and more self-sufficient communities. The development of the 'capital standard' for cleaner streets will also make a positive contribution.

Also, the emphasis on waste minimisation, recycling and reuse will create a healthier and improved environment for Londoners and others. Policies on specific dangerous wastes will make London a healthier place. Mass public involvement in recycling is also likely to engender fulfilment – as we feel we are making an increasing contribution to saving the planet.

Although waste facilities are an essential part of community infrastructure, they can bring 'bad neighbour' problems or perceptions and the Strategy contains policies and proposals to minimise any problems. Moreover, innovative state-of-the-art waste management facilities can be a source of pride to local communities and the Strategy and any subsequent promotional material should play on this aspect. The Strategy could do more to change the image of waste management into a more attractive, dynamic sector.

Nevertheless, with an increasing population, a restricted land area and an identified need for more waste management facilities, there will undoubtedly be competing pressures over land use – which could threaten green spaces and leisure/sporting/cultural resources. Boroughs are asked to make land available – and perhaps more guidance will be forthcoming in the proposed Supplementary Planning Guidance on waste.

To maximise the contribution of waste facilities to local communities and individuals, it is important that the true environmental and social (particularly health) costs of different management options are identified. We identify the need for such a study in our response on objective 9, above.

Similarly, the importance of adequate spatial planning for new plant, collection, separation and re-processing sites in London must be adequately addressed through the proposed supplementary planning guidance (SPG), especially as the draft London Plan will also defer waste spatial planning to the SPG.

Appendix 1

London Sustainable Development Commission Draft London Sustainable Development Framework October 2002

Vision for London

London has retained its position as one of the World's great cities over many centuries because of the quantity, quality and diversity of its people, businesses, infrastructure and natural resources. However, the downside of this pre-eminence has been the associated social division, pollution and increasingly wasteful use of resources.

Our vision for the 'World Class' London of the future is a place where all Londoners and visitors feel the greatest possible sense of physical, emotional, intellectual and spiritual well-being. Our thinking and decision-making will be long-term, meeting the needs of the present without compromising the ability of future generations to meet their own needs. This means ensuring that the ways in which we live, work and play will not interfere with nature's inherent ability to sustain life.

We will achieve this by taking responsibility for the regional and global impacts of city life. With our commitment to inclusion and cooperation, we will build upon and celebrate London's diversity, in all its forms. Resources will be used efficiently and fairly and the natural and built environment protected. Our reward will be a prosperous, vibrant and healthy city, one in which we all make the most of opportunities for fulfillment.

All of us have a part to play in achieving this vision. Each step will be supported by clear objectives and targets and will be sustained by learning from success.

Objectives

Overall objective:

We will achieve environmental, social and economic development simultaneously; the improvement of one will not be to the detriment of another. Where trade offs between competing objectives are unavoidable, these will be transparent and minimised.

Taking responsibility

1. As citizens of a world city, we will be aware of the impact of our actions on the rest of the UK and beyond, and will take a responsible world leadership role which contributes to the planet's sustainability.
2. All of us - individuals, households, businesses, local and regional government, voluntary groups — will have the information, knowledge, motivation and support to help us to take both short and longer-term decisions that will make us and our city more sustainable.

3. We will seek new and creative ways to overcome the constraints of time and money that prevent us from taking effective decisions. We will ensure that these decisions are informed by a long-term perspective.

4. We will build and sustain a powerful sense of ownership and responsibility for our city, with civic participation as the norm.

Developing respect

5. Our city will have a culture of tolerance, fairness and respect, not only recognising London's diversity as its key strength, but also embracing nature. The right of all London's citizens and communities to pursue fulfilment will be assured, so long as this does not infringe the rights of others.

6. Our city will be a place where everyone feels at ease and is able to enjoy life. All who work, live and play in the city will be able to pursue their objectives in peace, free from the threat of crime, violence or intrusion.

7. Our communities will be dynamic, stable, adaptable, innovative, progressive – creating a city in which conflicts will be resolved as part of a transparent and participatory process.

Conserving resources

8. We will protect and improve the city's natural ecosystems, its biodiversity, its open spaces and its built environment. We will help to protect the wider regional, national and international environments with which London has links.

9. We will limit and deal with our pollution, and use energy and material resources prudently, efficiently and effectively, including re-using and recycling our residual waste.

Getting results

10. We will make consistent economic progress – not necessarily always growth – to enable wider economic, social and environmental objectives to be pursued both in London and beyond. Business transactions in London will be conducted to high ethical standards.

11. All the different parts of our economy will consistently invest in new technologies, new solutions, new plans and new ideas that contribute to achieving social, economic and environmental objectives simultaneously.

12. All forms of work will be recognised and valued. Paid employment will be plentiful.

13. We will be healthy and fulfilled – through living in good housing, with wide opportunities to develop as individuals and communities, through access to services, good quality food, green space and cultural, sporting and leisure activities.