

## Heathrow Expansion DCO Consultation Response Waste

September 2019

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### 1. Overview

- 1.1 This paper sets out the Mayor's response on waste to the statutory consultation by Heathrow Airport Limited (HAL) on its expansion proposals.
- 1.2 The work undertaken for the Preliminary Environmental Information Report (PEIR), while rigorous within its scope, represents a narrow and limited view of waste management and hence what appropriate design principles, waste management techniques, and mitigation measures should be employed in planning and construction.
- 1.3 In accordance with circular economy principles, the approach should seek to be much more expansive and integrated on how design can reduce material use during construction and, by ensuring building materials, components and products can be disassembled and reused at the end of their useful life, over the lifetime of the development.
- 1.4 The plan/strategy/application should also address how the development will manage waste on-site and support reuse and recycling through the provision of adequate and accessible storage spaces and collection systems. The importance of circular economy principles is also highlighted in Airports National Policy Statement (NPS) (Ref: 5.137)
- 1.5 The proposed loss of any safeguarded waste sites within the London boundary of the project will also need to be replaced with appropriate compensatory capacity within London, at or above the same level of the waste hierarchy.
- 1.6 The London Plan will be in important and relevant consideration for the scheme and the relevant waste (and directly related) policies that would apply under the current London Plan (2016) are:
  - Policy 5.3 – Sustainable design and construction
  - Policy 5.15 – Waste net self sufficiency
  - Policy 5.17 – Waste Capacity
  - Policy 5.18 – Construction, demolition and excavation wastes
- 1.7 Relevant and directly related policies that would apply under the draft new London Plan (July 2019) are:

- Draft London Plan (July 2019)
- Policy SI7 – Reducing Waste and supporting the circular economy
- Policy SI8 - Waste Capacity and net self sufficiency
- Policy SI9 – Safeguarded waste sites

## **2. General approach and strategy**

- 2.1 It is appreciated that significant work has gone into the sourcing and creation of data sets to establish waste capacity baselines, with a particular focus on drive time capacity (in this case, appropriate waste capacity within a half hour radial journey from the site) for waste facilities for processing/accepting construction and demolition wastes incapable of being reused/recycled on site. There is a major focus on landfill capacity as against arisings for waste not managed in situ.
- 2.2 However, data sets and mitigations seem less in depth and less thought through for both more operational type wastes during construction phases (e.g. more household type wastes generated by work operatives etc) and also waste arisings and waste management issues into actual project operational phases of the built project. A more project-focused cradle to grave approach would be preferable given the scale and profile of the project and its anticipated environmental impacts.
- 2.3 Waste approaches for major projects like Heathrow expansion can suffer due to the creation of thematic silos that puts waste in a distinct category without fully understanding interactions with other critical themes such as energy use, air quality and design. This tends to favour end of pipe solutions such as recycling and recovery (which are important) but misses out the opportunity to cut waste in the first place and at the end of the life of construction by designing out waste, and designing for reuse and recyclability, particularly through design specifications and procurement etc. In other words, as currently constituted, it very much represents the principles of linear use of materials, rather than circular use of resources. While the waste documentation puts a place-holder for circular economy, it doesn't identify it as a unifying principle of design and seek to locate it within project and design structures.
- 2.4 There is a lack of clarity at this stage on the issue of like for like (or greater) replacement for lost waste sites and processing/management capacity. The proposed loss of any safeguarded waste sites within the London boundary of the project will need to be replaced with appropriate compensatory capacity within London, at or above the same level of the waste hierarchy, as per current London Plan policy 5.17 – Waste capacity, and draft new London Plan policy SI9 Safeguarded waste sites.
- 2.5 The draft new London Plan seeks net self-sufficiency in the management of all waste streams with the exception of excavation waste, by 2026, and major projects need to contribute to this target.
- 2.6 The development should be required to prepare a Circular Economy Statement that

addresses the whole life cycle of development, as per policy S17 of the draft London Plan. This would look to identify opportunities for designing out waste, and maximising resource efficiency across the entire project lifecycle, from design to operation. Certainly, a major construction project such as Heathrow should be aiming to be net zero waste in line with draft new London Plan and circular economy design principles.

### **3. CDE Wastes**

- 3.1 The PEIR has a focus on and models for significant volumes of in situ recycling of construction, demolition and excavation (CDE) wastes. London already performs well for on site recycling/reuse of CDE materials ranging from 80 to 95% on major projects. The draft new London Plan expects projects to achieve 95% recycling of construction and demolition waste and 95% beneficial use of excavation waste (Policy S17). The draft new London Plan also emphasises the importance of keeping products at higher value end use (e.g. reusing or recycling wood rather than using as fuel for burning) where possible, with a focus on the waste hierarchy and implementing circular economy principles, prioritising reduction and then reuse (even if off site) over recycling.
- 3.2 There should be a prioritisation of non-road-based transport modes, in this case rail, for material import and export. In addition, utilisation of demonstrable freight logistics approaches (software that optimises vehicle movements within a project) to maximise both project value and reduced CO2 emissions via road-based transport should be incorporated. A Site Waste Management Plan should also be produced.

### **4. Operational wastes**

- 4.1 Operational, household type wastes from CDE phases (e.g. site estate wastes etc) of the project should also be managed in line with the waste hierarchy. Maximum opportunities and infrastructure/service provision for on-site recycling and material separation of household type operational wastes should be prioritised. Where feasible, provision should be made to meet the Mayor's Minimum Service level for recycling (London Environment Strategy 7.2.1a), with weekly collection of both the six core dry recyclables and separated food waste.
- 4.2 For post construction/operational phases, the design must include infrastructure (e.g. separate bins, reverse vending machines etc) and behavioural focus on reduction, reuse and recycling.
- 4.3 Beyond the issue of safeguarding existing waste sites (or re provision where lost), opportunities should be sought to optimise all waste infrastructure. Plans for on-site waste management infrastructure should explore the opportunities and possibilities of opening that capacity for other commercial operators (e.g. Anaerobic Digestion, Material Recycling Facilities).