

London Waste and Recycling Board Summary Response to the Draft London Plan

1. The London Waste and Recycling Board (LWARB) is a statutory Board established by the GLA Act 2007 to help reduce waste and improve its management in London. The Board is chaired by the Mayor of London (or his representative). The Board also includes four councillors and two independents appointed by London's councils and one independent member appointed by the Mayor of London. LWARB has provided technical advice to the GLA during the drafting of the London Plan. We are pleased to observe some of our recommendations have been included within the draft strategy. A summary of our key comments on the draft strategy are provided within this brief.
2. LWARB strongly supports the concept of Good Growth which underpins the draft London Plan and welcomes the recognition of the role the circular economy will play in delivering this vision. It will be vital that the London Plan considers and incorporates the circular economy, otherwise growth in London will not be developed in a sustainable way that meets the Mayor's vision for a Low Carbon Circular Economy as set out in the draft London Environment Strategy. We would suggest this is recognised more clearly in the Good Growth chapter. We would suggest the definition of the circular economy is consistent throughout the document, and aligns with the definition included in the Draft London Environment Strategy(LES).
3. We welcome the inclusion of circular economy design principles in the design chapter. Embedding circular economy into new and existing homes will assist in delivering the LES aims of becoming a zero waste city, and the vision to become a low carbon circular economy. To meet these aims it will be essential that the design and construction of new homes incorporate circular economy and the use of all resources.
4. We support the inclusion of the need for recycling and waste disposal facilities that are convenient, appropriately integrated and designed to work effectively. We welcome the inclusion of consideration of adequate and easily accessible space for separation and storage of recyclables, food, and residual waste, and we welcome the inclusion of the reference to LWARB's waste management planning advice for new flatted properties.
5. We fully support the inclusion of the requirement for referable applications to support the circular economy, aim to be net zero waste and include a Circular Economy Statement. We will work with the Mayor's regeneration and environmental teams, and Mayoral Design Advocates (MDAs) to create further detail on the criteria and guidance for Circular Economy Statements.
6. We support the inclusion of circular economy construction principles within the draft Plan. We support the recognition that precision manufactured homes (e.g. pre-fabrication and modular construction) can reduce construction time and

support reuse of materials. We support the statement that regional consolidation and distribution centres are needed to serve the city coupled with micro-distribution centres this will help support the need for an increasingly efficient transport network, and with the Mayor's aims of reducing air pollution.

7. We support the inclusion of policies to ensure buildings and space are fully utilised including flexible design, co-location and use of meanwhile spaces. Optimising use of buildings and space will help to increase housing supply, and support the principles of Good Growth and the circular economy. Designing for flexibility reduces wasted time, effort and materials traditionally associated with building use transitions and expands the range of possible users of a building.
8. We are concerned the draft plan does not include requirement for an overarching strategy which will identify how to deliver the waste infrastructure needed across London. We are pleased that the draft Plan recognises that "The successful implementation of the circular economy will help to reduce waste". However it is unclear from the draft plan how this has been reflected into the waste arising projections. The current Plan, produced by the previous Mayor, did not include consideration of the ability of the circular economy to reduce waste, or policies to drive the circular economy. Research by Arup into the effects of the circular economy on waste production in London has identified the potential to reduce waste by up to 60% by 2041 through circular economy interventions which avoid the production of waste. We would therefore strongly suggest that the Arup work is referenced within the plan and incorporated into the evidence base. We would suggest this highlights the need for apportionment to be constantly under review to ensure local plans take into consideration the wider context of circular economy progress across London, an oversupply of waste infrastructure is avoided, and land is freed up for circular economy or other uses. It will be important to consider the ability of private sector to deliver waste infrastructure capacity in a way that prioritises circular economy over linear economy.
9. This also highlights the need for a London wide strategy which identifies current and future requirement for the broad location and type of waste infrastructure needed, to address waste from all sectors, and which is also regularly reviewed. We would suggest this could be further strengthened through incorporating the assessment of current and future supply and demand for reuse materials, and spatial requirements needed to support a circular economy (e.g. broad location of micro consolidation centres).
10. We are concerned to note that the proposed KPI's which will be used to monitor progress of the new London Plan do not include any circular economy related metrics. We would recommend inclusion of a circular economy related target within the KPIs to ensure progress towards the Mayor's target of becoming a zero waste city, and vision of a low carbon circular economy is monitored. LWARB would be pleased to share our current work on circular economy metrics for London to support this.