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By email to: LondonPlan@london.gov.uk

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Dear Mayor Khan,

North London Waste Authority (NLWA) was pleased to receive the Draft New London Plan (NLP). As the largest waste disposal authority (by population and amount of waste handled) in the capital, and the second largest in the country, the NLP is relevant to us because it sets the framework for planning decisions and helps to establish planning priorities when there are competing demands for land use including waste. The population projections in the NLP are particularly relevant for us because they both set the framework for waste arisings, and provide a framework for borough projections for waste services (*inter alia*) that will drive the amounts of waste NLWA has to treat. In addition, the NLP establishes (Chapter one) the importance of the circular economy in increasing efficiency and resilience. This aspiration of a low carbon circular economy is in line with NLWA's thinking and accordingly we are supportive of the principles behind the main policies within the draft NLP.

NLWA similarly supports the policies that the NLP sets out in relation to air quality and the objective for London to become a zero carbon city by 2050. We additionally welcome the concept of the energy hierarchy and the use of the hierarchy in informing the design, construction and operation of new buildings. The priority is to minimise energy demand and then address how energy will be supplied and renewable technologies incorporated.

NLWA is keen to engage constructively with the Mayor to help London to continue to be a world-beating city, where people actively want to visit, work and live.

In summary our key points are:

- **Adequate waste management provision** - The recognition of the requirement for new housing developments to include adequate waste management facilities (i.e. separate collection points for recycling, food waste, residual waste etc.) is very much supported by NLWA. However, NLWA notes that the NLP could do more to embed this requirement within local planning policies. Space for separated waste and recycling containers should not be traded off against such other requirements

as additional space for cycle parking; both types of facility are required for London to move towards a more sustainable future, so one should not be sacrificed for the other

Monitoring and measurement is a key issue - The current London Plan includes a KPI to measure the “increase in municipal waste recycled or composted and elimination of waste to landfill by 2026”. The Mayor’s ambitions include targets for a zero waste city, recycling targets, and a vision of a low carbon circular economy. Although these ambitions are reflected in the Good Growth principles which underline the draft Plan, and they are incorporated into the draft Plan itself, they are not reflected in the list of KPIs that will monitor the progress of the NLP. We also note that monitoring the amount of residual waste remaining per household would be a better and more responsive metric than tonnes of waste recycling and percentage recycling rate as a result for the reasons set out in our response¹ to the Draft London Environment Strategy. We would urge the inclusion of metrics that adequately reflect the Mayor’s targets and priorities.

- **Waste management facilities provide essential community infrastructure** - As such CIL should be available to support waste infrastructure, which we regard as no different to schools or roads for example in terms of its eligibility for support. NLWA also supports swaps, credits and off-site contributions made with waste management facilities in principle, but within some parameters. For example, we would like to see the inclusion of waste facilities as essential public services provided to offset housing development – possibly with more credit for facilities which manage waste higher up the waste hierarchy.

Please also find attached our detailed comments on the draft NLP. The response is organised in line with the chapter sequence within the draft NLP.

If you require any clarification, please do not hesitate to contact me as above.

Yours faithfully

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¹ See: <http://www.nlwa.gov.uk/docs/consultation-responses/nlwa-response-to-draft-les-17-11-2017.pdf>

**NLWA Response to the
London Mayor's draft New London Plan (NLP)
(02/03/18)**

NLWA's response follows the draft NLP chapters and subjects:

Chapter/subject	Issue	NLWA response
1. Good Growth	Population growth anticipated from 8.9 million today to 10.8 million in 2041. Policy GG5 – Growing a good economy	<ul style="list-style-type: none"> • NLWA supports the principle of 'good growth' but we note that a larger population in the capital will generate more waste, and therefore it is imperative for London to adopt circular economy principles. The need for additional sites and facilities to handle London's waste (resources) will increase as a result. • NLWA supports Policy GG5 – Growing a good economy, but would like the Mayor to note the contribution that the circular economy could make to the capital as part of this growth strategy. • We fully support the concept of retaining London's waste (resource) within the capital although we noted in our response to the Draft London Environment Strategy (DLES) Objective 7.4, p.289/90 that there was some inconsistency about whether the DLES seeks 100% self-sufficiency for all wastes within London by 2026 (para 1) or just for municipal solid waste (para 4). Either way, NLWA trusts that the NLP is as supportive as possible to the development of new waste infrastructure in London, particularly as reuse and recycling activities that are part of a circular economy are likely to require more space per tonne of waste managed than residual waste treatment operations. NLWA also assumes the London Plan continues to seek <u>net</u> self-sufficiency, and that there is no absolute requirement for all wastes to be managed in London.

Chapter/subject	Issue	NLWA response
	Policy GG6 Increasing efficiency and resilience	<ul style="list-style-type: none"> • Whilst NLWA supports policy GG5, including policy GG5D to ensure that there is sufficient high quality and affordable housing, this new housing has to provide sufficient space for recycling. If we want London to be more sustainable it should not be allowable for compromises to be made e.g. between whether a new housing development has sufficient space to accommodate recycling containers or bicycle racks; we need both. • We also support Policy GG5B regarding the diversification of London's economy insofar as a move to a more circular economy within the capital can contribute towards this diversification.
	Policy SD1B5 – support and sustain Strategic Industrial Locations (SIL) and other industrial capacity	<ul style="list-style-type: none"> • It should be noted that projects such as NLWA's North London Heat and Power Project (NLHPP) replacement energy recovery facility at Edmonton can contribute towards this resilience.
2. Spatial Development Patterns	Lee Valley Opportunity Area	<ul style="list-style-type: none"> • NLWA supports the proposal to sustain SILs and other industrial capacity but we would urge the Mayor to make specific reference to waste management operations that are suited to such land, and also to give support to low carbon circular economy businesses within this context. • We recommend that the NLP makes an explicit statement about the fact that moving to a circular economy is going to require more land as sorting, recycling, repairing etc. activities require more land to sort and lay out the individual components of the 'waste' than just disposal. Therefore protecting SILs and other industrial land appears critical if London is to move towards a circular economy without expecting its wastes to be managed elsewhere.
	Lee Valley Opportunity Area	<ul style="list-style-type: none"> • As noted above, NLWA is developing a replacement energy recovery facility in the Lee Valley at Edmonton. This will generate electricity and heat, as well as providing a new reuse and recycling centre for local residents and businesses on the site. NLWA will thereby be contributing to the Lee Valley Opportunity Area into the future.

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	<p>Para 2.1.36 references the potential to deck over a small section of the North Circular immediately to the south of New Southgate Station</p>	<ul style="list-style-type: none"> • Within the Lee Valley Opportunity Area there is potential for more development of circular economy businesses such as Premier Sustain, which remanufactures office furniture. However, as noted above, typically such businesses need more space per tonne handled than conventional waste disposal operations, so the NLP should recognise and allow for additional land accordingly within the Plan. • The NLP should also perhaps enable more flexibility regarding the planning requirements for such businesses, which might be suitably located on less industrial areas. Reuse and repair operations are not bad neighbours, e.g. they do not emit significant odours or emissions, so may not need to be subject to the same spatial requirements as other waste disposal operations.
	<p>Policy SD2E – commits the Mayor to work with Wider South East (WSE) partners to address appropriate regional and sub-regional concerns such as water and flood risk and waste management</p>	<ul style="list-style-type: none"> • Specific proposals for the area of the north circular immediately south of New Southgate station need to be developed in partnership with the landowners. For example, we would ordinarily expect the former Friern Barnet sewage treatment works (owned by London Borough of Barnet and NLWA) which would potentially be part of this scheme to appear in the North London Waste Plan, i.e. to be allocated for waste use. • NLWA supports the recognition of the need for this wider collaboration – including on waste issues. • We note the increase in population predicted in the wider south east and therefore the need to co-ordinate our response to growing amounts of waste as a result in a cooperative way. • Within this context it is important that the NLP is clear that the references it contains are to net self-sufficiency and so incorporate the natural movements within the region that already take place as part of the normal arrangements of doing business within the wider south east. This is a point we make across the draft NLP.
	<p>Para 2.2.4 – references the strategic structures now in place to support WSE co-ordination</p>	<ul style="list-style-type: none"> • NLWA supports these arrangements and urges continuation within the NLP.

Chapter/subject	Issue	NLWA response
	<p>Para 2.5.8 - Land swaps, credits and off-site contributions to support local balances between Central Activities Zone (CAZ) strategic functions and housing</p>	<ul style="list-style-type: none"> NLWA supports these swaps, credits and off-site contributions in principle but within some parameters. For example, we would like to see the provision of waste facilities as essential public services being accepted as either credits or off-site contributions (in lieu of financial contributions) – possibly with more credit being awarded for providing facilities that manage waste higher up the waste hierarchy. It also appears reasonable to us to include such swaps within the Central Activities Zone (CAZ). NLWA considers that land swaps can support more sustainable living and that waste management facilities are an essential part of the move to a more sustainable lifestyle. Therefore, waste management facilities should be eligible for contributions. As an example, local and accessible provision of waste services provide not only convenience for the resident but reduced transport impacts and therefore reduced air quality impacts too, along with a number of other environmental and social benefits depending on the nature of the waste service or facility concerned. Within the concept of strong, resilient and adaptable town centres, the NLP should also recognise the contribution that reuse shops, charity shops, repair cafes and resource libraries ('libraries of things') can make to town centres. NLWA encourages the Mayor of London to consider incorporating 'reuse' as well as the sale of new items into town centre development objectives and plans in order to exemplify reuse as well as the sale of new items. Within this section, NLWA urges the Mayor of London to allow for on-the-go recycling, although we note that environmental charity, Hubhub's experience from their #SquareMileChallenge to recycle more coffee cups in the City was that permanent recycling facilities on the high street tend to collect contaminated waste and attract litter. However, facilities placed in workplaces, educational establishments, transport hubs and public buildings were better used and reduced the cost burden on local authorities. This being the case town centre strategies should include waste, recycling and reuse as
	<p>Policy SD9 Town centres: Local partnerships and implementation</p>	
	<p>Para 2.9.2 – town centre strategies to be tailored to each town centre</p>	

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	Figure 2.19 – Strategic Areas for Regeneration (based on 20 percent most deprived lower super output areas in England)	<ul style="list-style-type: none"> noted above, but recognise that a number of different players may be able to establish the necessary provision of facilities. We note the conglomeration of strategic areas for regeneration clustered up the Lee Valley and recommend that the NLP includes recognition of the role that the circular economy and resource management can play in the regeneration of the area.
3. Design	Policy D1 London's form and characteristics – D3) states that development design should aim for high sustainability standards	<ul style="list-style-type: none"> As a general point NLWA recommends that it would assist developers and planners if an implementation manual could be produced about how to apply and meet the design requirements contained within the NLP. Guidance would provide some certainty to those relying on the NLP to develop new facilities: NLWA would be particularly keen for such guidance to also provide predictability about the requirements for investment in circular economy developments so as to help investment of this kind. NLWA recognises the importance and usefulness of BREEAM as an appropriate metric for building sustainability but we would like the NLP to include a caveat such that it is not essential for every building to reach the highest possible BREEAM standards. There is a need for buildings to be designed for fitness for purpose (e.g. it is unlikely to be necessary for an appropriately located industrial warehouse to reach BREEAM 'excellent', and such a requirement might be a barrier to investment that could otherwise deliver wider circular economy benefits to the community). Longevity and lifecycle thinking should be incorporated into the NLP approach to buildings design and build. New buildings provide an opportunity for using recycled construction materials, to stimulate demand for recycled construction materials in accordance with circular economy principles. NLWA recommends that the NLP should more explicitly recognise the contribution that buildings themselves can make to a circular economy within the capital. In our response to the Draft London Environment Strategy (DLES) for example we noted that _more could be done to support the use of secondary aggregates from the bottom ash at energy recovery facilities both by private developers through new provisions in the London Plan and by TfL

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	<p>Para 3.1.8 states that shared and easily accessible storage space supporting separate collection of dry recyclables, food waste and other waste should be considered in the early design stage</p>	<ul style="list-style-type: none"> • NLWA notes and supports this ambition. It is sufficiently significant for us to suggest that this text is set out as a separate policy within the NLP rather than being included in the body text as currently. • Borough design code principles also need to be taken into consideration in any recommendation about storage for waste. We would argue that these on-site waste storage facilities (for both recycling and residual waste) can be communal, as long as walking distances to the containers aren't too great and the total capacity is sufficient for weekly collections so that collection authorities don't consequently have to bear the cost of more frequent collections for relevant waste streams.
	<p>Paras 3.1.10 – 3.1.12 – references design based upon circular economy principles and London's circular economy routemap.</p>	<ul style="list-style-type: none"> • We welcome the inclusion of circular economy thinking into the NLP. However, we recommend that the GLA produces an implementation manual for borough planners and developers; otherwise we are concerned about how they will assess conformity. An implementation manual would also assist because predictability about the requirements for investment in circular economy developments will help investment, as noted above. • NLWA recommends that the NLP should take a strong position about the requirement for comprehensive circular economy design principles to be included in new developments. These requirements should be discussed with relevant construction industry trade bodies and be in line with the London Waste and Recycling Board's (LWARB's) Circular Economy Routemap.. • NLWA also recommends that the requirements to design out waste during construction and to use recycled material in new buildings should be itemised separately within the list. One of these requirements is about designing out waste, the other is about driving recycling – they are different things and both are necessary.

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	<p>Para 3.4.11 – discusses the qualitative aspects to be addressed in the design of residential developments</p>	<ul style="list-style-type: none"> Designing-in and operating on-site separate containers for waste and recycling collection services is an issue which isn't just one for owner occupied or new build premises. Flats are a key target within which to increase recycling so it is imperative that the NLP gives clear instruction on the requirements for all. We understand that even in outer London boroughs that a large proportion of the housing growth projected in the NLP will be delivered through flatted properties rather than houses. As a result, improving the performance of recycling in flats is fundamental to achieving Mayoral ambitions for recycling across the capital. NLWA supports the inclusion of collection containers for recycling and waste disposal within this paragraph, but there should also be mention of the importance of ongoing management of the onsite waste collection systems. NLWA recommends in this regard that there should be an explicit cross reference to the Resource London and LEDNET 'Guide to improving waste management in the domestic rented sector' available at: http://resource.london.org/resources/toolkits/guide-improving-waste-management-domestic-rented-sector/ such that developers would be obliged to follow this.
	<p>Policy D7 – Public realm</p>	<ul style="list-style-type: none"> At present this policy does not include any reference to waste or recycling infrastructure; NLWA recommends that it needs to. This is to ensure that habits and messages promoted in the home environment are repeated and continued outside of the home – behavioural change is likely to be more effective if messaging is consistent both inside and outside of the home. And well designed communal recycling within the public realm can help ensure this consistency. Where the public realm is green space, guidance should then be provided as to which policies prevail across the chapters in the NLP.

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		<ul style="list-style-type: none"> NLWA supports policy D7 M to support the provision and future management of free drinking water at appropriate locations. However, NLWA requests that more detail is developed with boroughs and incorporated into the final NLP e.g. regarding responsibilities for provision, timescales and targets etc. (We also consider that this detail should be reiterated in para 3.7.11). Although the provision of drinking water fountains would take away a recycling opportunity for single-use plastic water bottles, our interest and London's should be in following the waste hierarchy with prevention followed in preference to recycling. NLWA observes a potential conflict here between the NLP requirement for development plans and proposals to ensure the provision and future management of free drinking water at appropriate locations in new or redeveloped public realm i.e. increased waste prevention and a higher recycling rate. NLWA addressed this in its response to the draft LES, where we recommended the Mayor adopts a target to reduce the amount of residual household waste arising rather than a target for increased recycling. This would remove the tension between more waste prevention and more recycling.. NLWA has no specific comment to make about this chapter – except to reiterate that CIL should be available to support waste infrastructure which we regard as essential community infrastructure, equally as necessary as schools or roads for example. We have also made comments elsewhere in this response about the requirement for new developments to incorporate sufficient storage space for residents to store recyclables both within individual properties and at communal spaces, and the importance of planners and developers being required to adhere to these requirements (i.e. not trading the waste and recycling requirements off against others when resources are tight).
4. Housing		
5. Social Infrastructure	Policy S1 Developing London's social infrastructure	<ul style="list-style-type: none"> The Authority suggests that paragraph 5.1.8 which includes reference to shared use and co-location of facilities could also include a reference to the provision of reuse operations such as a 'library of things' or a furniture reuse

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	<p>Policy S2 A5) identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services and facilities, and facilitate the release of surplus buildings and land for other uses</p>	<ul style="list-style-type: none"> • NLWA supports Policy S2A 5) and paragraph 5.2.8 for the co-location of facilities and integration of services and facilities to increase the utilisation of buildings. Whilst Policy S2 is about the co-locations of health and social care facilities we suggest that this might also include temporary uses or release of space for community social enterprises in the circular economy. There may also be opportunities to make better use of existing infrastructure through shared use, for example if local schools have workshops that are not used at the weekends, might there be a way to provide a community reuse project with these facilities over the weekend? The capital's infrastructure is significant, but it may be possible to enable better utilisation of what is already in place in support of the sustainability goals within the NLP.
6. Economy	<p>Support for new start-ups and allowing sufficient space to accommodate SMEs is noted in this chapter e.g. paras 6.1.5, 6.2.1 and 6.3.3</p>	<ul style="list-style-type: none"> • The draft LES indicates the Mayor's desire to encourage the establishment and growth of businesses in the low carbon and environmental sectors, and a vision for a low carbon circular economy. NLWA recommends that the NLP therefore includes details of the low carbon circular economy sector which the Mayor explicitly wishes to support. The London Waste and Recycling

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	Low carbon and environmental goods and services sector (para 6.8.3)	<p>Board (LWARB) might be the right body to lead on working closely with borough regeneration staff to develop these sectors within the capital.</p> <ul style="list-style-type: none"> NLWA welcomes the statement in paragraph 6.8.3 that the Mayor will support businesses to adopt the principles of the circular economy. However, NLWA would like the NLP to state that the priorities contained within the circular economy routemap should be followed and that in situations where there may be conflicting priorities, that the priorities in the routemap should prevail. Referencing the circular economy routemap will also ensure that when the routemap gets updated that the priorities in the NLP are up-to-date too. NLWA has no comment to make about this chapter
7. Heritage and Culture		<ul style="list-style-type: none"> NLWA notes and supports the application of this approach to Sites of Nature Conservation where appropriate across the capital.
8. Green Infrastructure and Natural Environment	<p>Policy G6 Biodiversity and access to nature – C “Where harm to a SINC (other than a European (International) designated site) is unavoidable, the following approach should be applied to minimise development impacts: 1) avoid adverse impact to the special biodiversity interest of the site 2) minimise the spatial impact and mitigate it by improving the quality or management of the rest of the site 3) seek appropriate off-site compensation only in exceptional cases where the benefits of the development proposal clearly outweigh the biodiversity impacts.”</p>	
9. Sustainable Infrastructure	<p>Policy SI2 Minimising greenhouse gas emissions D - “Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver greenhouse gas reductions. The operation of</p>	<ul style="list-style-type: none"> NLWA is supportive of Policy SI 2 but considers that the development of carbon offset funds should be developed in partnership with London local authorities and other significant or likely new greenhouse gas emitters. This could either be between now and the final NLP, or the final NLP could contain a commitment of the Mayor to develop this in this way.

Chapter/subject	Issue	NLWA response
	offset funds should be monitored and reported on annually."	<ul style="list-style-type: none"> The obligation to develop carbon offset funds should be contingent on a guidance document that has been developed with and agreed by the boroughs.
	Policy SI3 – 'Energy Infrastructure' is supportive of energy-from-waste. The policy states that energy masterplans should be developed for large-scale development locations which establish the most effective energy supply option. Energy masterplans should identify amongst other things "possible opportunities to utilise energy from waste." In addition, the NLP states that major development proposals within Heat Network Priority Areas should have a communal heating system and where a heat network is planned but not yet in existence the development should be designed for connection at a later date.	<ul style="list-style-type: none"> NLWA welcomes the inclusion of these statements about energy infrastructure within the NLP.
	Policy SI3 Energy infrastructure B4 energy-from-waste	<ul style="list-style-type: none"> NLWA recommends that energy masterplans should also consider where waste could be reused, recycled or incorporated in a low carbon circular economy before being used for energy generation to ensure consistency with the waste hierarchy. This is subject to adequate demand in reuse and recycling markets, and economic viability.
	<p>Policy SI7 Reducing waste and supporting the circular economy:</p> <p>A - Waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by:</p> <p>1) promoting a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible</p>	<ul style="list-style-type: none"> NLWA supports policy SI7. In other regional and national consultations, the Authority has also called for a residual waste per household target as a way of measuring progress on reducing waste and supporting the circular economy. We would recommend that this is included within the NLP too. If existing weight based recycling targets stay, then as noted above the waste hierarchy should apply in instances where there may be a conflict between different actions or inclusions in development plans and proposals e.g. the provision of free drinking water reducing single-use plastic water bottle usage and therefore an opportunity for further recycling.

Chapter/subject	Issue	NLWA response
	<p>2) encouraging waste minimisation and waste avoidance through the reuse of materials and using fewer resources in the production and distribution of products</p> <p>3) ensuring that there is zero biodegradable or recyclable waste to landfill by 2026</p> <p>4) meeting or exceeding the recycling targets for each of the following waste streams and generating low-carbon energy in London from suitable remaining waste: municipal waste¹²⁷ – 65 per cent by 2030 construction, demolition and excavation waste – 95 per cent by 2020</p> <p>5) designing developments with adequate and easily accessible storage space that supports the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.</p> <p>127 Based on the EU definition of municipal waste being household waste and other waste similar in composition to household waste. This includes local authority collected waste and waste collected by the private sector.</p> <p>B - Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:</p> <p>1) how all materials arising from demolition and remediation works will be re-used and/or recycled</p>	<ul style="list-style-type: none"> We suggest that Policy SI7(A(3)) is clarified to reference the waste hierarchy to ensure that recyclables are utilised at their highest value to ensure avoidance of waste to landfill does not result in an increase in incineration of recyclables. NLWA supports the target of zero biodegradable or recyclable waste to landfill by 2026 – although in practice this is difficult to monitor and difficult to ensure that absolutely all biodegradable and recyclable waste is excluded from loads reaching the landfill gate. We must also recognise the inevitability that some people overlook some of their biodegradable and recyclable wastes and some do not participate in such services at all. The Mayor is already setting out a minimum recycling service that all Londoners should be offered; there should be no requirement to go beyond this and to capture further recyclables from residual waste, particularly as: <ul style="list-style-type: none"> (1) biodegradable wastes from this source will not be able to satisfy end-of-waste criteria and cannot be made into a PAS100/110 product and (2) the markets for recyclable wastes are regularly demanding better quality inputs. Similarly, in our view it would be preferable to rely on a requirement for businesses over a minimum size e.g. generating a certain number of kilograms of waste per annum at any given premises to have a minimum number of recyclables collected instead. As noted above, the NLP should take a balanced approach with instruments to push recycling whilst recognising that if it is impossible to meet reprocessor quality standards then this push to recycle more could be counter-productive. For material that cannot meet reproducers' quality standards, the NLP should accept that the next best thing is energy recovery. This section of the NLP should include mention of waste-fuelled energy recovery facilities as an option.

Chapter/subject	Issue	NLWA response
	<p>2) how the proposal's design and construction will enable building materials, components and products to be disassembled and re-used at the end of their useful life</p> <p>3) opportunities for managing as much waste as possible on site</p> <p>4) adequate and easily accessible storage space to support recycling and re-use</p> <p>5) how much waste the proposal is expected to generate, and how and where the waste will be handled.</p>	<ul style="list-style-type: none"> Regarding target A4a. for 65% of municipal waste to be recycled by 2030, firstly NLWA notes that to achieve 65% municipal solid waste (MSW) recycling by 2030 in London, this must in part be achieved through recycling 84% of non-household municipal waste by 2030. We consider this recycling rate for non-household waste exceptionally challenging noting that the 65% MSW target includes fully private sector waste that boroughs do not collect – therefore much of this target achievement depends on parties other than waste authorities and therefore on waste streams over which the public sector has no control. In our view the Mayor would need to put forward a set of proposed new powers for either himself or waste collection authorities to direct business how to separate their wastes or alternatively, as in Scotland, for a general duty to be placed upon businesses in London to separate their wastes. Harmonisation of collection systems is mentioned - we are uncertain if this is really a land-use planning matter, and whether it should be included here at all. As noted above we recommend inclusion of a residual waste per household target within the NLP, but if the NLP continues to include tonnage based recycling targets we suggest the following: <ul style="list-style-type: none"> We note that in the LES the Mayor sets out an intention for a collective recycling target of 50% of LACW by 2025 and an aspiration of LACW 60% recycling by 2030. The draft London Environment Strategy (LES) contained an achievable household recycling rate, taking account of current policy drivers of 42% by 2030. The final LES and NLP should have consistent targets, and where the achievement of these requires national policy / legislative change and, or new funding, this should be made explicit. We would also like to see harmonisation of the terminology used as well as the targets. It would be helpful for the NLP to include a table which

Chapter/subject	Issue	NLWA response
		<p>shows both the LES and the NLP targets so that the requirements are clear.</p> <ul style="list-style-type: none"> • NLWA suggests that a percentage-based target for the non-household element of local authority collected waste appears appropriate, although we recognise that there are deficiencies in a percentage-based recycling target for the household element. For household waste a residual waste per household target would be preferable. • In the current London Plan reuse as well as recycling is included in construction, demolition and excavation waste. Reuse should be retained in the NLP due to its higher place in the waste hierarchy but it is unclear if this is the case. As noted in our response to the draft LES, NLWA gives much support to waste reuse through its biennial waste prevention plan and NLWA's activities and advice for individuals and the wider community, including through NLWA's third party reuse and recycling credits payments to relevant charities. NLWA prevents on average 10,000 tonnes of waste per year. Policy SI7(B) should also refer to reuse of entire buildings and the leasing of components where appropriate. • Regarding policy B-4) we welcome the inclusion of the requirement for design of developments to have adequate and easily accessible storage space to support recycling and reuse. However, there is a need for implementation guidance to be provided and for there to be no compromises as noted above, e.g. trading off recycling space for bicycle storage spaced. • It is unclear whether this policy refers to waste management during construction or thereafter, we have assumed that it refers to the use phase and if so, recommend that: • A reference to LWARB's waste management planning advice for new flatted properties should be included. Clarification should be incorporated into the final plan.

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		<ul style="list-style-type: none"> We welcome the inclusion of the requirement for referable applications to support the circular economy and to be net zero waste and for such applications to produce and submit a Circular Economy Statement as defined in Policy S17 (B). However, more detail is required about how such statements would relate to, for example BREEAM, and construction management plans. We would recommend that the requirements are not limited to referable applications only.
	<p>Policy S18 Waste capacity and net self sufficiency</p>	<ul style="list-style-type: none"> NLWA has a general concern about the use of terminology in this policy. This policy refers to <i>waste management sites</i> at A2, A4 and 9.8.8 but to <i>waste sites</i> at D. Policy S19 refers to <i>waste sites</i> in its title, in A and in 9.9.1. As <i>waste deemed to be managed</i> has a specific meaning in the London Plan (see 9.8.4) the use of the term <i>waste site</i> is preferred as in: A waste management facility is located on a waste site. NLWA endorses the support within the NLP for the circular economy – although as noted elsewhere in this response, it is important to note that reuse operations generally take up more space per tonne than disposal. It is important that the land-use implications of a move to a circular economy in the capital are fully reflected in the NLP.
	<p>Developments proposals for new waste sites or to increase the capacity of existing sites should be evaluated against the following criteria:</p> <ol style="list-style-type: none"> 1) the nature of the activity, its scale and location 2) job creation and social value benefits including skills, training and apprenticeship opportunities 3) achieving a positive carbon outcome (i.e. re-using and recycling high carbon content materials) resulting in significant greenhouse gas savings - facilities generating energy from 	<ul style="list-style-type: none"> NLWA has some concern about the suggestion that planning applications for waste sites should be assessed for jobs and/or apprentices. There is a risk that waste facilities, although essential, may have fewer jobs/ha in the long term than other types of business activity. It is therefore important to ensure that any assessments reflect the nature of the activity. Some essential activities such as sewage treatment works and waste-fuelled energy recovery facilities are likely to generate fewer jobs per hectare than some other types of business activity, but given their essential nature as community infrastructure they should not be disadvantaged by planning policy.

Chapter/subject	Issue	NLWA response
	<p>9.8.8 - The text in this paragraph states that "Large-scale redevelopment opportunities and redevelopment proposals should incorporate waste management facilities within them"</p>	<ul style="list-style-type: none"> • It is unclear to NLWA whether this requirement applies to all large-scale redevelopment opportunities or just to those within SILs or LSISs. It is also unclear to us what type of waste management facilities are being referred to here. We therefore suggest the wording needs more clarity. • We also suggest the term 'large scale redevelopment opportunity' should be clearly defined. • In addition to the above, NLWA considers that waste management facilities are essential community infrastructure and as such should be eligible for Community Infrastructure Levy (CIL) receipts. • We also recommend that the scope of waste management facilities should include reuse. For example on the Pembury estate in Hackney there is a reuse project run by Groundwork London – called the LOOP, one of five such projects across London. Groundwork produced an implementation guide (available at:
	<p>waste will need to meet, or demonstrate that steps are in place to meet, a minimum performance of 400g of CO2 equivalent per kilowatt hour of electricity produced</p> <p>4) the impact on amenity in surrounding areas (including but not limited to noise, odours, air quality and visual impact) - where a site is likely to produce significant air quality, dust or noise impacts, it should be fully enclosed</p> <p>5) the transport and environmental impacts of all vehicle movements related to the proposal - the use of renewable fuels from waste sources and the use of rail and waterway networks to transport waste should be supported.</p>	<ul style="list-style-type: none"> • NLWA suggests it is also appropriate for the NLP to distinguish between separate assessments for each stage of a development. For example, there may be enormous opportunities for apprenticeships during the construction phase of a project, but less so during operation.

Chapter/subject	Issue	NLWA response
		<p>https://www.groundwork.org.uk/Sites/repurpose/Pages/repurposeresources) on how to replicate reuse operations on estates and included three suggested type of reuse operation that could be supported by a minimum number of properties. It would be ideal if CIL receipts could be used to support rent payments for example for this type of project and if the NLP could support such development, although we recognise that this may be difficult to do in a planning document.</p>
		<ul style="list-style-type: none"> As a general comment about this section, NLWA notes that the information on construction, demolition and excavation (CD&E) waste is limited. There are no apportionments or land-use targets for these waste streams, which we believe will be necessary for London boroughs as planning authorities.
	<p>9.8.16 Waste processing facilities should 'contribute to the local economy as a source of new products and of new jobs'</p>	<ul style="list-style-type: none"> It is unclear if this requirement is a planning requirement. If so, it has real potential to be inequitable, because different types of waste processing can have very different staffing requirements and outputs. As noted above, NLWA has concerns because waste facilities, although essential, may have fewer jobs/ha in the long term than other types of business activity. Some essential activities such as sewage treatment works and waste-fuelled energy recovery facilities are likely to generate fewer jobs per hectare than some other types of business activity, but given their essential nature as community infrastructure they should not be disadvantaged by planning policy.
<p>10. Transport</p>		<ul style="list-style-type: none"> We support the need for an increasingly efficient transport network, and support the Mayor working with partners to minimise servicing and delivery trips on the road network through consolidation. We would support LWARB in suggesting this work could include investigating appropriate locations for consolidation, and micro consolidation and distribution sites, which are needed to serve the city now, and to facilitate planned major development, and support increased reuse of materials. As below, we are also keen that opportunities for reverse logistics (taking disused products back to producers) are not missed.

Chapter/subject	Issue	NLWA response
	Policy T7 – Freight and servicing	<ul style="list-style-type: none"> • We agree with policy T7 – Freight and servicing, which states that Opportunity Area Planning Frameworks, Area Action Plans, and other area-based plans should include freight and servicing strategies. We would suggest a new point A2 could be added to include reference to consolidation and micro consolidation centres in terms of infrastructure and facilities to manage freight and servicing. We suggest point A3 could also include collaborative strategies and reverse logistics arrangements (taking disused products back to producers) to reduce emissions from freight as a whole. We also support point E to support new consolidation and distribution facilities, and H, to support micro consolidation as this can help to support effective reuse of transit packaging materials. • It is important to note that without adequate provision for reverse logistics the circular economy aspirations for the capital will be more difficult to achieve. We believe a circular economy approach would benefit from combined freight facilities for both products and secondary resources. • From the waste management perspective, it is also important to recognise that a network of waste treatment facilities that are designed to operate at optimal economies of scale (to minimise costs and incorporate the best environmental controls) is likely to require a number of supporting waste transfer stations. This is so that the relatively small loads in waste collection vehicles travel relatively short distances, and that the longer journeys to waste treatment facilities are then done in relatively large loads to minimise vehicle movements and impacts.
11. Funding the London Plan	Para 11.1.53 – outlines the benefits of transitioning to a circular economy.	<ul style="list-style-type: none"> • NLWA appreciates the inclusion of text to explain the potential benefits of the circular economy in paragraph 11.1.53 and the financial benefits this could bring. In relation to the definition of the circular economy in this paragraph, we would refer back to our earlier points that this definition should be consistent within this document and across other Mayoral strategies.

Chapter/subject	Issue	NLWA response
	<p>Para 11.1.54 – notes that business will lead the transition to a circular economy.</p>	<ul style="list-style-type: none"> As noted elsewhere in this response, NLWA considers that the transition to a circular economy could also be facilitated by allowing CIL receipts to fund waste infrastructure including reuse and other facilities which contribute towards the circular economy. We would like to see waste at all levels of the waste hierarchy to be eligible for CIL receipts. We agree that businesses will lead the transition to a circular economy because they are responsible for the design of products and services and are therefore the only organisations that can genuinely lead the transition. However, businesses will only implement circular economy thinking into their businesses if pushed – there is a need for national legislation to support the transition to a circular economy. As described in paragraph 11.1.54., a mix of investment from a variety of sources is needed. We are therefore pleased to see that the GLA and LWARB have identified budgets to invest in circular economy businesses on commercial terms, but suggest in some cases grants may be required (funded ideally by producers).
<p>12. Monitoring</p>	<p>Table 12.1 – Key performance indicators and measures</p>	<ul style="list-style-type: none"> The proposed KPI's which will be used to monitor the progress of the NLP do not include any circular economy related metrics. As noted elsewhere in our response we consider that the amount of residual household waste per household would be a useful indicator for the NLP. Other metrics that may be necessary to keep strategic attention on waste management measures that will make the greatest environmental improvements could be assisted by considering and measuring a number of metrics such as carbon, nitrogen, phosphorous and sulphur (all important factors for food production and a healthy environment) and/or LCA techniques, although we recognise that they may not all be applicable to the NLP. Alternative approaches for measuring progress could be more aligned with national policy work on natural capital including the development of obligations and monitoring regimes. It may also be beneficial to focus measurements on different types of product/waste, rather than where the waste arises, i.e. from households or business.

Chapter/subject	Issue	NLWA response
		<ul style="list-style-type: none"> The current London Plan includes a KPI for the "increase in municipal waste recycled or composted and elimination of waste to landfill by 2026". The Mayor's ambitions include targets for a zero waste city, recycling targets, and a vision of a low carbon circular economy. Although these ambitions are reflected in the Good Growth principles which underline the draft Plan, and they are incorporated into the draft Plan itself, they are not reflected here. If they are not included this would mean progress towards these vital elements of the London Plan would not be monitored. We would urge the inclusion of metrics that adequately reflect the Mayor's targets and priorities.