



London Waste and Recycling Board Response to the Planning for the future consultation.

October 2020

1. The London Waste and Recycling Board (LWARB) welcomes the opportunity to respond to the Planning for the future consultation. LWARB is a partnership of the Mayor of London and the London boroughs to improve waste and resource management. The city's economic and environmental future depends on a transition to a low carbon circular economy. LWARB works to ensure that London's businesses, local government and communities thrive by helping them make the very best use of resources and materials.
2. [LWARB's Business Plan for 2020 – 2025](#) places the reduction of London's consumption-based emissions of CO₂e at its core – aiming to reduce them by identifying leverage points that will enable an accelerated and just transition to a low carbon circular city.
3. We welcome the proposition in the white paper to 'bring a new focus on design and sustainability to ensure that the planning system supports efforts to combat climate change and maximises environmental benefits. However, we have concerns whether the proposals outlined will support the delivery of this vision which we have outlined below.

General Issues

4. We support the need to ensure that planning policy helps meet the Government's commitment to net-zero greenhouse gas emissions by 2050. Within this context, we would like to stress that the significant contribution that construction materials and the construction process have on carbon emissions. The Ellen MacArthur Foundation have highlighted that 55% of global emissions are energy-related and meeting climate targets will also require tackling the remaining 45% harder to abate global emissions which are associated with the production of goods and materials¹. LWARB estimate that construction materials contribute between 9—10% of global greenhouse gas emissions. Therefore, interventions on how to reduce the greenhouse gas emissions associated with construction must be incorporated into the revised policy alongside those which support a transition to zero-operational carbon.
5. The Government has made a commitment to move towards a circular economy in the National Resources and Waste Strategy² with targets to recycle 50% of household waste by 2020. In London, the Mayor's London Environment Strategy³ has set a target of 50% recycling of Local Authority Collected Waste by 2025 and an ambition to achieve 50% household waste recycling by 2030(as part of the overall 65% municipal waste recycling target). Reforms to planning process should also support the implementation of these commitments and targets.

¹ <https://www.ellenmacarthurfoundation.org/publications/completing-the-picture-climate-change>

² <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>

³ <https://www.london.gov.uk/what-we-do/environment/london-environment-strategy>



Development management policies in Local Plans (Proposal 2)

6. We appreciate that removing development management policies from Local Plans could streamline the process and avoid duplication of effort. Local Plans give local authorities the freedom and opportunity to show leadership and to move forward specific agendas which have then subsequently been adopted on a wider scale. We are concerned that centralisation of policies nationally would constrain local authorities who wish to set more ambitious targets and promote innovation.
7. For example, LWARB are currently working with the London Borough of Tower Hamlets to produce a best practice Supplementary Planning Document for waste and recycling to improve the quality of waste management solutions in planning applications and ensure that there is a clear responsibility for building manager to maintain these services. LWARB also worked closely with the GLA on developing certain aspects of the [draft London Plan](#), which shows leadership on the topics of whole life carbon emissions and embedding the circular economy into development plans which local authorities are expected to adopt. By removing development management policies from Local Plans, local innovation would be at risk and the incremental improvements across the country from testing policies in individual Local Plans would be lost.
8. If it is decided to remove development management policies from Local Plans, it is essential that the national development management policies show leadership on environmental agendas of national importance such as climate change and the move towards a circular economy. New national policies should be based on the precedents already set in the most ambitious existing Local Plans (not the least ambitious). Therefore in its reform of national planning policy, we encourage the Government to consider and adopt [the draft London Plan](#) sustainability policies relating to Minimising greenhouse gas emissions (Policy SI 2), in which whole life carbon calculations are required for new developments, and Reducing waste and supporting the circular economy (Policy SI 7), in which statements on how circular economy principles are addressed are required for new developments. LWARB can provide advice in refining any new or revised national development management policies in relation to reducing consumption-based greenhouse gas emissions and implementing a circular economy based on our experience in this field, such as reuse and recycling targets, management processes and appraisal mechanisms.
9. We note the alternative proposal to limit the scope of policies that could be addressed within Local Plans rather than remove altogether. This alternative proposal seems pragmatic as long as it would allow local authorities to show leadership and adopt innovative approaches on aspects of local importance or where performance levels could be influenced by local factors. For example, if the national policy set out the scope for establishing minimum recycling and reuse rates, the local authority could set the specific targets based on the local design codes and market. We would support this proposal over the proposal to completely remove development management policies from Local Plans.



Zoning & Local Plan development

10. One of the simplest and most cost effective ways of reducing these emissions is by reducing the amount of products we use and, for the built environment, that means retaining existing buildings and upgrading and adapting them to meet current needs. We are concerned that zoning areas for 'Growth' and 'Renewal' may be interpreted as permission to demolish and re-build. We propose that an understanding of the existing buildings and infrastructure and their capacity to be transformed is incorporated as an essential part in the process for determining both the uses and capacities for these areas. This transformation capacity should be taken into account in the standard method for establishing housing requirements (Proposal 4) and assessed in the "sustainable development" test (Proposal 3).
11. In addition, we would like to express our concerns for the proposals which would, in effect, make demolition and rebuild a permitted right via the automatic outline planning permission in 'Growth' areas if demolition is required as part of the development (Proposal 5). We would propose demolition is not automatically approved. We recommend that demolition is permitted on the basis that a pre-demolition audit (identifying how the maximum amount of waste can be reused) is a pre-requisite to permission and that additional targets are set around what happens to the demolition materials. For example, in Seattle, to qualify for a demolition permit the applicant must:
- reuse 20% of the building materials by weight, excluding asphalt, brick and concrete, or
 - recycle 50% of the building materials by weight, excluding asphalt, brick and concrete, or
 - reuse or recycle 100% of asphalt, brick and concrete
12. Storage space, remanufacturing and recertification facilities are required to facilitate material reuse and recycling. We therefore recommend that, when designating areas within Local Plans, sufficient allocation needs to be made for the storage, re-certification and remanufacturing processes required to facilitate material reuse and recycling. (Proposals 1 & 3).
13. We also recommend that the Government introduce tax relief, such as variable rates of VAT, on materials innovation that reduces waste and reliance on virgin materials, and increases materials reuse, repair and remanufacture. This should include tax relief on materials with recycled content in them. This will help to reduce waste and accelerate take up of recycled/reused materials, helping to reduce reliance on virgin materials and cut associated greenhouse gas emissions from their use.
14. We support the digitisation of the planning process (Proposal 6) and we believe there is greater opportunity for the system to capture data that records what has actually been built (compared to what was planned) at the completion of construction to enable more informed decisions to be made in the future. For example, the new system should capture the building use, age, floor area and height, embodied carbon and a post-completion bill of materials identifying, as a minimum, the building layer, element, material and quantity. This will assist in allowing more informed decisions around the viability of the site for re-development and assist in maximising the recovery and reuse of



materials when the sites are redeveloped. Through the [CIRCuIT project](#), LWARB and our partners will be developing more detail on the recommended data to be captured over Autumn 2020 and we will subsequently be developing data templates to support this data capture. We would be happy to share these to inform the development of the new digitised system.

National Design Guide, National Model Design Code and local design guides

15. To enable the UK to become net-zero, the developments we build now need both to be zero-carbon ready from an energy perspective and also ready to enable low carbon re-development in the future. The adoption of circular economy principles of design for disassembly, flexibility and adaptation can help to achieve this. It is essential that these qualities are embedded into the National Design Guide, National Model Design Code and local design guides. (Proposal 11). These documents should also ensure that they promote and facilitate a wider transition to a circular economy through incorporating shared spaces, shared facilities and access to shared assets (for example through libraries of things). We explore this further below in our response on 'Provision for waste management'.
16. A preference for adaptation and transformation over demolition and new build should also be embedded into the accompanying National Model Design Guides and local design codes. (Proposals 1, 11 & 14).
17. We are concerned that that the National Design Guide, National Model Design Code, local design guides and pattern books may become too prescriptive and non-conducive to the circular economy principle of reusing and recycling materials in new construction, for example, if they do not comply with the designated vernacular. We also have concerns as to whether these mechanisms may restrict areas of innovation in relation to what materials are used and how they are put together, meaning that new material innovations are discouraged. These restrictions could have serious environmental consequences and must be avoided (Proposal 14).

Fast track for beauty

18. In relation to the fast track for beauty, we are concerned that this could result in developments which do not sufficiently meet the sustainability ambitions within the white paper. We propose that this should be amended to a fast track for beauty and sustainability, and to also include minimum sustainable development performance metrics, such as meeting a whole life carbon target and/or meeting a minimum rating in a green building assessment scheme. (Proposal 14).
19. As highlighted in paragraph 4, the consumption-based emissions associated with materials need to be considered to ensure the climate impacts of development are fully taken into consideration. When assessing the environmental impacts of proposed schemes, the emissions associated with the materials used should also be considered



alongside operational carbon emissions and the ecological and climate change adaptation measures. (Proposals 15 &16).

Infrastructure Levy

20. We have concerns that extending the Infrastructure Levy to ‘better capture changes of use which require planning permission’ could discourage the adaptation and transformation of existing buildings (Proposal 20). We would recommend that the Infrastructure Levy is used as mechanism to promote the adoption of circular economy principles by providing exemptions or reduced rates for the adaptation or transformation of existing buildings (Proposal 19).

Provision for waste management

21. Several research studies by LWARB (including the Making recycling work for people in flats report ⁴) highlight examples across the capital of poor waste management system design and lack of ownership of the systems once the building is occupied creating long term problems for users (residents and building managers) and councils operating collections services. These problems lead to lower recycling rates, higher costs for local authorities and a general lack of engagement from users, which can in turn can lead to further neglect and antisocial behaviours such a fly-tipping. Good amenities and service provision, including for waste and recycling services, can improve the appearance of public spaces and thereby the sense of wellbeing and owner for residents.
22. Delivering waste management services in wholly urban areas is complex and Defra has recognised that built-up areas with a higher proportion of flats in particular make this more challenging as residents may find it difficult or otherwise be unwilling to store waste for recycling.
23. London is growing and the population is forecast to reach 10 million by the 2030s. Flats account for up to 80% of housing stock in some boroughs and purpose-built flats account for 37% of London total housing stock. GLA projections show this figure rising to 46% by 2030 (with an additional c.1.89million purpose-built flats being built by that date).
24. If national and regional recycling targets are going to be achieved, it is essential that the provision of high-quality waste and recycling management systems, particularly in high rise housing developments, form a central part of any revised planning system.
25. The planning system needs to take account of the fact that new developments are passed on to building managers who are often left to deal with insufficient or inappropriate waste and recycling systems. Greater emphasis needs to be placed on developers to understand the logistics of waste and recycling service provision to ensure appropriate arrangements are incorporated in the designed and development.
26. The Government should set minimum standards within the revised planning framework for adequate and easily accessible storage provision for waste and recycling materials, including separate food waste.

⁴ <https://resourceLondon.org/resources/research-and-innovation/making-recycling-work-for-people-in-flats/> , <https://www.lwarb.gov.uk/what-we-do/resource-london/successes-to-date/efficiencies-programme-outputs/>



27. The proposals need to ensure that at the national planning policy level, high quality waste and recycling management systems are a key requirement of all new buildings or redevelopments. The same level of emphasis and importance should be placed on waste and recycling services within the planning system as is placed on other utilities such as energy.
28. Waste and recycling behaviours are complex. Several research studies by LWARB (including the aforementioned 'Making recycling work for people in flats' report) show how residents good waste and recycling behaviours are disrupted by poor waste and recycling service provision. The planning process for waste and recycling systems needs to take account of the whole user journey for waste and recycling, including the in-home arrangements for recycling separation, taking the waste and recycling to the final collection point; and the fixed collections infrastructure (such as communal bins or shoot systems). Consideration needs to be given to modern living and consumption habits and appropriate space should be designed into the home to encourage good waste management behaviours. Furthermore consideration out of the home should also be given to optimise reuse (such as reuse stores or the afore mentioned libraries of things). and recycling over final disposal.
29. The planning system need to ensure that the design and installation of waste and recycling management systems are appropriate for all end users (residents, building managers and collection crews) for the life of the building, and that there is clear ownership of environmental performance (including recycling rates) and maintenance of these systems. These key principles should trickle down from national requirements into the local design guides and codes proposed in the White Paper.