

17<sup>th</sup> November 2017



By email to: [environment@london.gov.uk](mailto:environment@london.gov.uk)

Draft London Environment Strategy  
City Hall  
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Dear Ms Rodrigues,

NLWA was pleased to receive the Draft London Environment Strategy (DLES) and fully supports the direction of travel. NLWA appreciates the Mayor's ambition, and is eager to see the future implementation of circular economy and waste prevention measures in particular.

Clearly there are the all too familiar challenges of improving outcomes with reduced funding, whether this be in relation to behaviour change work, collection services such as at flats, or new infrastructure for reuse, recycling or energy recovery.

NLWA is eager 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.

Please find attached our detailed comments on the DLES. The response doesn't express support for each individual policy and proposal; rather it just focusses on those aspects of Chapter 7 (Waste) where NLWA thinks the DLES can be strengthened. NLWA also comments on other chapters which are relevant to our operations and duties.

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

Yours faithfully



Andrew Lappage FCIWM CEnv  
Head of Operations  
North London Waste Authority

**NLWA Response to the  
London Mayor's Draft London Environment Strategy (DLES)  
(17/11/2017)**

**CONSULTATION QUESTIONS: WASTE**

**1. Do you agree that the Mayor's policies and proposals will effectively help Londoners and businesses to recycle more?**

Generally, yes. But:

Circular Economy (CE) and waste prevention

- i) Movement towards a CE as in Chapter 10 requires not only the recycling measures set out in the DLES, but a much greater emphasis on waste prevention (particularly at the product design and manufacturing stages) and waste reuse. Policy 7.1.1, p.272/6 addresses this, but NLWA believes more extensive work will be needed, much of which is likely to entail the Mayor pressing the Government for additional powers or new national legislation for extended producer responsibility and other means of driving movement to a more environmentally sustainable society, for example through requirements for sustainable design and production, and for greater levels of reuse.
- ii) Given that waste prevention is superior to recycling in the waste hierarchy, the Mayor could consider such targets for London beyond the Courtauld Commitment food waste target noted within Proposal 7.1.1a. For example, the Mayor could consider, as an indicator of commitment to waste prevention and CE, the publication by waste disposal authorities of the ratio between (a) prevention expenditure and (b) contract payments for the treatment of recycling and residual waste from their area to give an impression over the medium term as to how much emphasis waste authorities are giving the top of the waste hierarchy. If the Mayor considers this could be a useful indicator notwithstanding different contract structures between waste authorities, it would be important firstly to introduce such an indicator in a way that does not create an unreasonable reporting burden, and secondly to not set a target for this indicator, as there should be no pressure on waste authorities to spend particular sums if it will not be done cost-effectively.
- iii) There appears to be little support for waste authorities to increase levels of reuse as part of their waste prevention work, and it is unclear in the draft London Environment Strategy whether or not reuse activity does contribute to the Mayor's recycling targets. NLWA supports much waste reuse as part of its [biennial waste prevention plan](#) and 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.
- iv) NLWA suggests that the Mayor considers tasking LWaRB with finding new ways to effectively support greater levels of reuse, whether through the public, private or third sectors, lobbying for new national policy and/or legislation as necessary within wider work for a more circular economy.
- v) NLWA understands the term "zero waste" to be commonly accepted to mean either 'zero waste arising' or, less ambitiously, 'zero waste to landfill'. The Mayor appears to be using the term to mean 'zero recyclable and compostable waste to landfill'. Clarity of terminology might help avoid potential misunderstandings.

### The nature of the recycling targets

- vi) Tonnage-based percentage recycling targets can conflict with waste prevention (e.g. the composting of each additional tonne of food waste will improve a recycling percentage by more than preventing each tonne from arising in the first place). It might be possible to address this disparity and to prioritise the upper end of the waste hierarchy to some extent by artificially giving prevention and re-use tonnes an extra weighting (above recycling) in target-setting and measurement (but see next point).
- vii) Tonnage-based percentage recycling targets do not reflect the variable environmental gains from recycling (or reusing) different types of waste. Clearly the Mayor's EPS, a carbon-based metric, does reflect these variable gains, so it may be appropriate to give greater emphasis to this metric, and to lobby the government to do the same in future national targets and indicators.
- viii) Tonnage-based percentage recycling targets may pull away from [national](#) and [international \(such as China\)](#) needs for high-quality recyclates; effective moves towards a CE mean the waste industry has to deliver-up secondary resources that other industries can cost-effectively use. NLWA emphasises however that this does not necessarily mean local authorities must bear all the costs of cleaning-up waste streams; rather, we need to look holistically and dispassionately at the lowest cost to society of moving towards a CE and whether more investment in final removal of contaminants at MRFs or reprocessors (e.g. paper mills) is more cost effective (financially and environmentally) than local authorities having either an additional waste stream to collect, or a requirement to separate wastes at the kerbside. High recycling levels such as set out in DLES will require coordinated action throughout the cycle of product design, manufacture, distribution, use and re-use/recycling; the Mayor's influencing ability (government and business) is likely to assist.
- ix) Percentage household recycling targets put waste authorities in competition with private-sector waste prevention/reduction, re-use and recycling; a small-tonnage example would be that household batteries delivered to RRCs count towards the NLWA recycling rate, but similar batteries deposited in retailers' in-store battery banks in north London do not count ... so for waste authorities to maximise their recycling rate they should encourage residents to only deposit batteries at RRCs.
- x) Percentage non-household recycling targets appear appropriate but may put LA trade waste services at a commercial disadvantage to private-sector competitors given that the latter do not at present have similar targets or any parallel obligation to local authorities' duty to be in general conformity. The ability of the Mayor to drive (through incentives and/or penalties of some sort) the reuse and recycling of non-LACW will be necessary to ensure boroughs are not undercut by a private sector able to offer businesses cheaper and/or more convenient waste services.
- xi) It is not apparent in DLES how the high levels of additional non-household waste recycling are to be delivered. Waste collection authorities have lost the power to effectively require businesses to separate their wastes into specified containers. Looking forward, it may help if the Mayor were to call on Government to look at the Scottish example of duties on businesses to separate wastes, ideally with an ability for local authorities to issue fixed penalty notices for non-compliance. More radical alternatives the Mayor may wish to contemplate would be firstly to advocate to the Government (subject to consideration of any disbenefits of a loss of competition) that it makes the collection of commercial wastes a duty of local authorities again (but with differential pricing for different amounts and types of waste, unlike when it was included in business rates) as a way of having secure feedstocks with which to commission long-term services and infrastructure through investment confidence that cannot be given to anyone at present, with the control of commercial wastes being so completely fragmented; or for boroughs or sub-regional areas to create approved lists of commercial waste providers (including

boroughs and their contractors) from which London businesses have to choose, all of which will provide services that maximise reuse and recycling. Having fewer waste collection vehicle movements through consolidation of services appears to offer an effective way of reducing a range of environmental impacts. Service providers might offer direct collections from individual business premises or communal containers at central locations, with some form of controlled access so that each business pays appropriate charges for different types of waste/resource. Any environmental assessment could logically incorporate the fact that waste authority collection vehicles are always likely to be passing all businesses at least weekly (and in many cases on main roads, several times a day), so waste authorities may be able to offer the best environmental outcomes.

- xii) DLES does not appear to recognise the underlying problem of differentiation between household and non-household waste. NLWA notes that in almost all areas household waste and non-household waste is collected in the same vehicles, and believes there are multiple ways in London and across the country in which waste authorities assess and report the proportion of their waste that is household and non-household. These differences will affect reported household waste recycling rates.
- xiii) DLES should contain more on 'positive' behaviour change ... comprehensive recycling services are provided by waste authorities, but people clearly need further encouragement to use them more; effective communications campaigns appear essential for the achievement of the 42-43% recycling level noted by the Mayor and for the later higher targets proposed in DLES.
- xiv) Recognising that positive communications are not likely to achieve on their own the step-change in recycling performance sought by the Mayor, DLES should also contain more on 'negative' behaviour change ... to reduce litter, fly-tipping, wilful non-recycling and contamination of recycling, with lobbying from the Mayor for appropriate enforcement powers for waste authorities and the surveillance powers for effective enforcement.
- xv) DLES assumptions on the contribution of street leaves to recycling targets are not clear; if there is a prospect of regulatory change, boroughs will have best data on availability of street leaves and NLWA is available to discuss issues of compost quality.
- xvi) NLWA suggests that ash metals from energy recovery facilities that are recycled should count towards local recycling target achievement, as should secondary aggregates made from bottom ash where they displace virgin aggregates or other similar resources.

Requirement for waste authorities to prepare own new strategy/plan

- xvii) NLWA requests clarity as to what in practice the Mayor is seeking through (a) DLES Box 30, p.259 saying waste authorities should produce a waste management strategy or plan setting out how their activities will help implement the LES and (b) Proposal 7.2.1a, p.280 saying waste authorities will need to demonstrate how they will meet the LES minimum recycling service provision by 2020 at the latest (incl. at flats where feasible). At one end of the spectrum this could mean the Mayor is seeking a fully revised North London Joint Waste Strategy; at the other it could require a short list of service improvements and behaviour change activity that we intend to do.
- xviii) The point is made elsewhere about the need of waste authorities to understand the underlying modelling assumptions and conclusions of DLES; this will be necessary to develop a waste strategy/plan for household and non-household wastes collected by local authorities.



**2. Do you support the Mayor's ambition to ensure food waste and the six main recyclable materials (glass, cans, paper, card, plastic bottles and mixed plastics) are collected consistently across London?**

Yes, in particular the development of a common vision of recycling services that will facilitate London-wide recycling communications through Resource London, but moving towards a Circular Economy will require more than this:

- i) NLWA believes there will be few ways to achieve the high recycling rates set out in the DLES (and therefore there will be a natural degree of convergence of collection systems for different property types).  
Notwithstanding that there are many measures that will be needed in order to achieve the step-change in recycling performance sought in the DLES, NLWA believes that if the Mayor were to develop a vision for some 10-15 years ahead, in partnership with waste authorities, that will allow convergence on colour-coding of waste containers over time, this would greatly assist London-wide behaviour change campaigns (and increasing participation and capture rates are fundamental to success with targets) without impinging on local choices of container-type, collection frequency, etc. Given that any such change would benefit behaviour change work and recycling rates across all London, the Mayor might wish to consider funding the cost of change for relevant boroughs from the GLA precept.
- ii) The Zero Waste London graphic p.268/9 shows garden waste within the residual waste fraction, which appears inconsistent with the DLES goal of diverting all biodegradable wastes from landfill.
- iii) NLWA suggests that the final LES is clear that any requirement for the separate collection of food wastes allows for the separate collection of food wastes with green garden wastes where this is preferred locally; NLWA experience of making compost of certified quality in a facility part-funded by the former London Recycling Fund has been positive, with waiting lists of local allotment societies wanting the compost at some times of year.
- iv) NLWA suggests further review of the potential contribution of 'recycling on the go' facilities, acknowledging that quality of materials has been problematic for some.
- v) NLWA requests clarity in relation to the relative importance of the tonnage-based household recycling targets on the one hand (whether expressed as a percentage or kg/hhld as suggested elsewhere) and the carbon-based Emissions Performance Standard on the other, given the different environmental benefits of preventing, reusing and recycling different materials.
- vi) NLWA suggests there should be future flexibility within targets and progress monitoring regimes in order to reflect changes in the balance of different types of housing in London, and significant changes to the composition of LACMW.
- vii) Similarly, NLWA suggests there should be future flexibility within any future vision for additional core waste streams (e.g. WEEE).
- viii) NLWA suggests the Mayor lobbies the government for the restoration of collection authorities' enforcement powers to the greatest extent possible, and that where appropriate these are made available to waste disposal authorities (principally in relation to RRCs).

ix) NLWA suggests the Mayor may need to seek powers for the Mayor and waste authorities to require the high levels of recycling from other producers of municipal waste (e.g. possibly the Scottish example above).

**3. Do you think the Mayor should set borough specific household waste recycling targets?**

This is a matter for our WCAs. The geographical boundaries of NLWA are such that performance levels achieved across all London should most likely be achievable in the NLWA area as a whole. It is important, if the Mayor does set borough-specific targets, that these do reflect different possibilities that arise from housing stock, prevalence of gardens and other relevant demographic factors, and that the financial implications are addressed (assuming such borough specific targets will form part of the test of 'general conformity'). The differences between two-tier and unitary areas will also need to be considered, particularly in relation to RRCs and bulky waste recycling. It is also important, if they are reliant on future national policy or legislative changes, that the extent of this is made clear. Finally, NLWA would seek advice on any expectations the Mayor might have on the pooling of borough-specific targets across joint waste disposal authority areas.

The adoption by the Mayor of a residual waste per household target that meets the 65% target from the current baseline would deal with the differences between boroughs that arise from the (un)availability of green waste, but may not deal with the differences arising from housing stock and any other relevant demographic factors e.g. levels of deprivation, transience, housing type, etc. and potentially exceptional amounts of litter in areas of international tourism. See 7.2.1a below and the Appendix.

**4. What needs to happen to tackle poor recycling performance in flats?**

No simple task, but an essential one. LWaRB is best placed to review and disseminate national and international best practice both in relation to new technologies and physical services, and to the maximisation of participation and capture (and the minimisation of contamination) through positive behaviour change and enforcement activity in areas as culturally and economically diverse as London. This may include comparisons not only of the above, but also the extent to which new housing developments are always required in practice to accommodate minimum standards for recycling both indoors for residents and outdoors for cost-effective collection services that achieve higher levels of separation of suitable quality biodegradable and recyclable wastes.

There is a lack of data too regarding the performance of flatted properties – robust before and after studies of what interventions and changes are most effective at increasing recycling in different types of multiple occupancy properties. LWaRB is well focussed in this regard and, we believe, understands the different types of flats (house conversions; low-rise; high-rise; above shops) and the communications and enforcement challenges.

Local planning authorities may need support through strengthened London Plan provisions or other means to ensure that developers are not able to secure planning permissions where proper provision for wastes management is compromised or given up for other features valued in the planning system; and for enforcement support where planning law has been breached or recycling services are not being properly used.

LWaRB (through Resource London) and LEDNET have produced a set of recommendations to improve recycling performance in flats, including the potential contribution of landlord licensing regimes. NLWA recommends that the Mayor lobbies for the changes and the resources identified here.

Taking advice from brands and retailers may also be effective. High quality evaluation of what works and accompanying data to support decision-making will become increasingly important for the maximum recycling achievement in the most cost-effective ways.

#### **5. What are the most effective measures to reduce single-use packaging in London such as water bottles and coffee cups?**

Achieving waste prevention gains on a large scale is not straightforward:

- a) The above appear very useful issues symbolically (to raise awareness and drive behaviour change), but are not significant in terms of tonnages and total resource-use re. a societal move to a Circular Economy. The background data p.260/3 does not show these wastes separately, so it is not possible for NLWA to take a more precise view.
- b) NLWA notes however that water bottles and coffee cups are very different issues, as the former comes down through distribution chain and is reusable and recyclable, but the latter arises just at the retail stage and is neither reusable nor always recyclable. Options such as reuse incentives or deposit return schemes may therefore have to be very different.
- c) Both types of packaging would appear to lend themselves to city-wide promotional campaigns, but NLWA suggests at Proposal 7.1.1b (last bullet) that DLES includes working principally with relevant reprocessors (nationally and internationally) as well as the initial supply chain in accordance with accepted EPR principles.

#### Water bottles

- d) The Mayor might consider one or more London pilot 'refill' schemes <https://www.refill.org.uk/refill-schemes/>, where retailers display their willingness to top-up peoples' water bottles free of charge.
- e) The Mayor might wish to commission a life-cycle assessment (LCA) on plastic v. glass for water bottles (e.g. more product/lorry with plastic than glass) if considering a deposit return scheme (noting the current government consultation on this topic), and to consider any wider health and social impacts if this could reduce the consumption of less healthy drinks.
- f) The design of any deposit return scheme will need consideration of such matters as collective v. individual producer responsibility to ensure cost-effectiveness and environmental effectiveness (look at relevant international experience including Scotland and France).

g) The final LES will, as previously noted, need to be able to be responsive to new materials innovation re. bioplastics or other; and the lead-times that might exist technically and commercially to separate new materials effectively for reuse/recycling/composting.

#### Coffee cups

h) NLWA suggests the final LES should encourage the use of re-usable cups (insulated so contents stay at temperature longer and less drink is therefore wasted).

i) NLWA suggests the final LES should consider deposit return schemes (collective v. individual producer responsibility, possibly including a requirement to take-back competitors' cups for recycling) re. cost-effectiveness and environmental effectiveness.

j) NLWA suggests the final LES should will, as previously noted, need to be able to be responsive to new materials innovation re. bioplastics or other; and the lead-times that might exist technically and commercially to separate new materials effectively for reuse/recycling/composting.

#### Others

NLWA suggests that in the above work the Mayor remains alive to the possible inclusion of other specific wastes (e.g. confectionary wrappers of fast-food packaging) that might catalyse wider pro-environmental behaviour change throughout the LES period.

### **6. Please provide any further comments on the policies and programmes mentioned in this chapter.**

#### Definitions

NLWA notes the DLES definition of 'municipal waste' (box 28, p.255), drawing on DEFRA's 2011 redefinition (p.254). If the final LES is to use the European-derived definition of 'municipal waste' (waste from households and similar wastes), the LES should note the DEFRA distinction between Local Authority Collected Waste (LACW – all wastes collected by local authorities under their waste powers) and Local Authority Collected Municipal Waste (LACMW – waste collected by local authorities from households and wastes that are similar), and to incorporate these into how targets are set, measured and published. It appears inconsistent to include non-local authority wastes in the DLES definition of 'municipal waste' on the basis that it is similar to waste from households, and not to exclude those elements of the local authority waste stream that are accepted as dissimilar to waste from households (e.g. gully waste and much fly-tipped waste).

Once the definitions are clear, it will be helpful if the final LES sets out more precisely how the recycling targets are calculated across various types and various sources of waste so that waste authorities can then develop plans and services accordingly, including consideration of how these will be funded.



Notwithstanding the above, the test of general conformity with the municipal waste management elements of the final LES that the Mayor will apply from time to time should, it appears, only consider those activities that relate to 'municipal waste' as defined in the Greater London Authority Act 1999, s.360. This is, broadly speaking, waste in the possession or under the control of a London waste authority.

Objective 7.2, p.279 – DLES notes "Implementing best set of household recycling interventions will cost waste authorities an extra £107m-£319m" and suggests potential offsets against business waste income, reduced disposal costs and shared revenue contracts. NLWA suggests detailed work is done with London Councils (and SJWDAs) on implementation costs before the final LES is published, and that opportunities for additional income be explored.

NLWA suggests that the landfill tax that arises from London's waste should be returned to London as new and additional money to fund waste-related behaviour change work in London and improvements to London's waste services; similarly, if there is to be a tourist tax in London as in many other cities abroad, NLWA suggests that an element of this should be used in the same way.

NLWA considers the DLES target to achieve 65% MSW recycling by 2030 in London, in part through achieving 84% non-household municipal waste recycling by 2030, appears exceptionally challenging (noting that the 65% MSW target includes fully private sector waste that boroughs do not collect, so much depends on parties other than waste authorities).

In relation to this, Fig.42, p.277 shows significant growth in non-household LACW recycling tonnages, but does not allow for any increase in non-household LACW residual tonnages as boroughs' customer-bases grow; it is difficult to see how this is consistent with the borough duty to offer a non-household waste service that does not distinguish between recycling and residual. It would be helpful if the Mayor can indicate examples of where 84% non-household municipal waste recycling is being achieved in other large urban areas using the same definitions, and whether the proposed London Business Waste Recycling organisation under LWaRB might achieve this.

Proposal 7.2.1a, p.280/1 – The DLES sets a target of 50% LACW recycling by 2025 and aspires to 60% by 2030. NLWA has set out the deficiencies it sees in such a percentage-base recycling target above, and sets out a proposal for a residual waste per household target in the Appendix. NLWA suggests a percentage-based target for the non-household element of LACMW appears appropriate however.

Proposal 7.3.2a, p.286 EPS targets – The published DLES targets are for an increasing amount of CO<sub>2</sub>e per tonne of waste. During the consultation period, GLA officers have indicated to NLWA that this is a typographical error and will be corrected in the final LES.

Proposal 7.3.2b, p.286/8 – DLES notes the Carbon Intensity Floor (CIF) to be applied to energy-producing waste facilities will be reviewed by 2025 with a view to tightening it from 400g/kWh to around 300g/kWh of CO<sub>2</sub>. NLWA would appreciate assurance any such review will be carried out in consultation with all waste authorities.

NLWA agrees with the importance of carbon reduction and supports the Mayors efforts to implement more local, decentralised, low carbon energy, for example, through CHP-enabled energy from waste.

For some materials which are non-recyclable or are not-easily recycled (for example, composites, some plastics and contaminated materials) the most appropriate means of treatment is energy recovery in line with the requirements of the waste hierarchy. This has the dual benefit of providing a controlled means of disposal but crucially supports the preservation of natural resources. In addition, energy recovery not only substitutes the extraction of virgin fossil fuels but, when compared with landfill, has lower environmental impacts across a range of indicators such as acidification, eutrophication, freshwater aquatic ecotoxicity, human toxicity and abiotic resource depletion.

Both collection and disposal authorities have very little control over what enters the waste stream without substantial compulsion measures or economic incentives and cannot influence product design higher up the supply chain, but have a primary duty to manage the all such wastes nonetheless. This emphasises the above points made about the importance of behaviour change resources and activity.

Objective 7.4, p.289/90 – NLWA observes there is some inconsistency about whether DLES seeks 100% self-sufficiency for all wastes within London by 2026 (para 1) or just for MSW (para 4).

Either way, NLWA trusts that the next London Plan will be 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 facilities.

NLWA assumes the London Plan will continue to seek net self-sufficiency, and that there will not be an absolute requirement for all wastes to be managed in London.

The DLES notes an expectation of landfill near London running out by 2026 and advocates zero biodegradable and recyclable waste to landfill by 2026 (p.23, 265, 269), but doesn't contain this within a specific proposal. NLWA supports this approach as it will be impossible to separate all such wastes in a condition that is acceptable to relevant reprocessors; this is particularly true for the biodegradable fraction, as it is not legally possible to make PAS100/PAS110 'end of waste' products from bio-wastes that have not been separately collected. DLES should then recognise that where recyclable wastes cannot be cost-effectively separated at marketable quality, the best solution is then energy recovery (CHP).

Proposal 7.4.1a, p.290 maximising use of local sites – NLWA believes there should not be a separate obligation on waste authorities of this nature, particularly if it is a test of general conformity that creates an obligation to use one contractor over another (and creates an opportunity for the nearer contractor to therefore charge more); waste authorities will always pursue the most cost-effective solutions, and cost here (particularly given other Mayoral strategy requirements for transport) should be seen as a reasonable proxy for environmental impact.

However, if notwithstanding competing pressures for land, the London Plan can provide for a competitive network of proximate waste management facilities, this would have the benefit of obviating the need for and impacts (environmental and financial) of much bulk waste transport in London.

## **7. NLWA Comments on other Chapters**

### **Chapter 4: Air Quality**

Impacts on borough waste collection services will be addressed by NLWA boroughs individually. It would appear reasonable however to NLWA that any changes required of borough waste fleets should be required of commercial waste fleets to the same extent and at the same time, particularly if the high DLES target for commercial waste is to be achieved. Similarly, NLWA seeks parity of treatment between its contractors' bulk waste vehicles and other mobile plant, and those of commercial wastes management companies.

Proposal 4.2.1e, p.80/2 – The DLES advocates the consolidation of distribution networks to reduce congestion and improve air quality. NLWA believes this appears to miss an opportunity to facilitate improved reverse logistics that would support the objectives of Chapters 7 (waste) and 10 (circular economy), noting our comments on environmental outcomes at DLES Q.1, NLWA comment xi) above. This might be achieved through direct services to individual business premises or through communal containers at central locations, with some form of controlled access so that each business pays appropriate charges for different types of waste/resource.

Proposal 4.2.3e, p.93 – The DLES says the Mayor will consider developing a policy to enclose polluting or dusty activities on waste sites. NLWA believes this should remain primarily a matter for the EA and its environmental permitting regime and requests that, if pursued, this be the subject of specific consultation due to the potential impact on established Re-use and Recycling Centres and some other activities.

Proposal 4.2.4b, p.98 – The DLES proposes that London planning policy should take precedence over national policy (illustrated by reference to the Housing Standards Review and DCLG's air quality work). NLWA suggests this should be tempered by making any such provision subject to explicit consultation on a case-by-case basis; this is particularly so given the explicit DLES uncertainty re. the Governments proposed Air Quality Strategy for the UK in 2018 (p.115).



Proposal 4.3.3b, p.111 – The DLES notes concern about possible emissions from gas-powered CHP plant. NLWA requests that any review of emissions limits by the Mayor includes consideration of anaerobic digestion (AD) plants that may be designed to produce gas-to-grid, such that they can make a positive contribution to London's self-sufficiency for waste where appropriate. NLWA particularly seeks confirmation from the Mayor that no attempt would be made to prevent a lawfully operating CHP energy recovery facility from processing waste due to its proximity to other sources of emissions such as the A406 North Circular Road. See also Chapter 6, Policy 6.1.4.

### **Chapter 5: Green Infrastructure**

NLWA suggests that the final LES should explicitly recognise the competing pressures for increased green space and for the self-sufficiency for managing London's waste in accordance with the LES, and the obvious housing and employment pressures.

NLWA seeks recognition that where sites have both a 'green' and another designation in local planning policy, that it is formally recognised that any development may incorporate a reasonable compromise between the designations.

### **Chapter 6: Climate Change mitigation and energy**

Managing the pathway to 2050, p.198 – The DLES notes future consideration of five-year carbon budgets to create an emissions pathway to 2050. NLWA constructively draws attention to the complexities of two-tier waste authorities that will need to be accommodated in such work.

Policy 6.2.1a, p239/40 Decentralised energy – The DLES notes the Mayor's intention to encourage and support more decentralised energy. NLWA's Development Consent Order (DCO) provides that the new [Energy Recovery Facility at the Edmonton EcoPark](#) will be heat-enabled. LB Enfield's company '[energetik](#)' is intending to develop a district heating network at Meridian Water and other locations. NLWA would be pleased to discuss with the Mayor any support that the proposed Decentralised Energy Enabling Project (DEEP) and/or the proposed District Heating Network Delivery Body might be able to offer to it; it is important that sub-regional and London-wide activities do not duplicate one another.

NLWA suggests it may be helpful for the Mayor to revisit the work on the [London Heat Map](#) as for resilience purposes it would appear to be highly beneficial if different heat sources could be linked and back each-other up (for consumer confidence and to avoid where possible the need for back-up boilers/generators).

Policy 6.1.4, p.233 – The DLES notes, despite carbon benefits, concern about possible emissions from gas-powered CHP plant. NLWA requests that any review of emissions limits by the Mayor includes consideration of AD plants that may be designed to produce gas-to-grid, such that they can make a positive contribution to London's self-sufficiency for waste where appropriate. NLWA particularly seeks



confirmation from the Mayor that no attempt would be made to prevent a lawfully operating CHP energy recovery facility from processing waste due to its proximity to other sources of emissions such as the A406 North Circular Road. See also Chapter 4, Proposal 4.3.3b.

Policy 6.2.1a, p240 – The DLES notes the Licence Lite project for GLA group members to purchase zero/low carbon electricity from generators in London. NLWA would be pleased to discuss this with the Mayor in the future.

Policy 6.2.2, p.244 – As above NLWA has an interest in decentralised energy, and is willing to engage with the Mayor. NLWA believes that the positive CO<sub>2</sub>e contribution of energy recovery facilities relative to landfill (at the site and due to reduced transport) should be acknowledged directly in the final LES, and not just implicitly in the EPS.

### **Chapter 10: Transition to a low carbon circular economy**

NLWA appreciates the limitations of what is possible through the LES in relation to the circular economy, and that the Mayor's role in this regard will be principally one of influencing industry and government. Significant moves towards a circular economy are likely to require legislation at national and supra-national levels. Particularly in relation to physical objects, such action will be needed to bring about change from the very initial design of products right the way through their manufacture, the way in which they're made available to users, and the way in which the resources embedded in them are captured for further beneficial use. In relation to the 'biosphere' it may be that there is more that can be done to encourage the return of nutrients to soils and the development of public acceptability of crops and maybe livestock produced and reared on land to which such nutrients have been returned; the Mayor's power of influence may be helpful here.

Nonetheless, NLWA had expected to see the thinking and recommendations of the LWaRB Circular Economy Route Map fully woven into the DLES, as a circular economy can only function when applied across the economic cycle and embedded in all design, production, distribution, use and recovery. NLWA attended the June launch by LWaRB of the Route Map at [The Building Centre](#), where the notion of the circular economy has been taken seriously through [visiting speakers](#) and the possible benefits were raised that if there were resource hubs for the construction industry to use near central London, they could avoid significant tonnages of waste that otherwise arise due to the (understandable) restrictions that are placed on them as to when they can get materials in and waste out. NLWA notes that such wastes are not 'municipal' (i.e. from households or similar to waste from households), but believes that consideration of such wastes could have been incorporated into the DLES, if only as a way of demonstrating some existing good practice to hopefully trigger transferable thoughts for other sectors. Such resource hubs could be seen as a parallel to the reverse logistics point made for the goods industry's delivery/distribution arrangements noted above (Chapter 4).

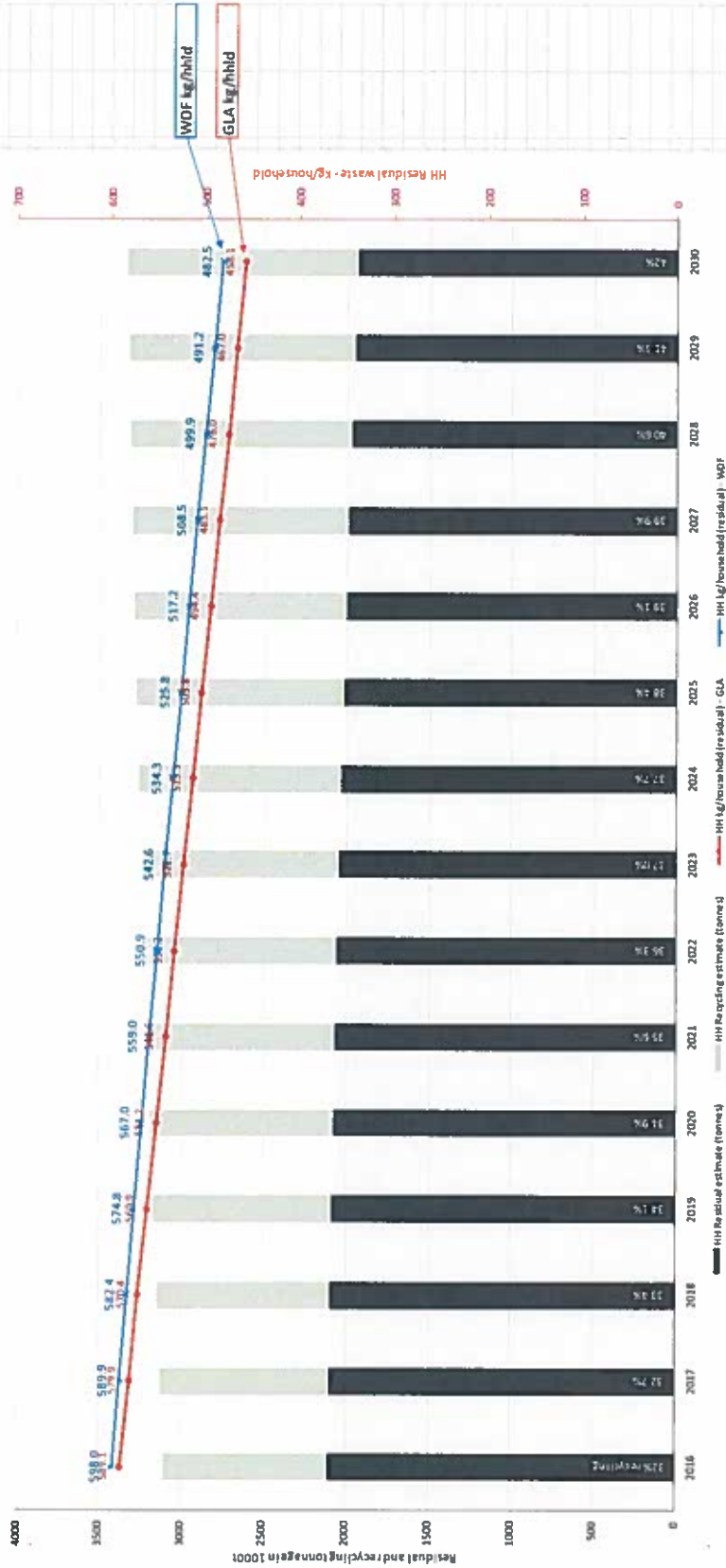
## **Chapter 11: GLA group operations – leading by example**

The DLES sets out some very positive activity and proposals. NLWA adds 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 and other members of the GLA group when commissioning construction works.

Data Source: GLA															
Household (tonnes)	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Non-household (tonnes)	3103	3126	3148	3169	3189	3208	3226	3243	3259	3274	3288	3301	3314	3326	3337
Percentage recycling	32%	32.7%	33.4%	34.1%	34.9%	35.6%	36.3%	37.0%	37.7%	38.4%	39.1%	39.9%	40.6%	41.3%	42%
HH Residual estimate (tonnes)	2110	2103	2096	2087	2077	2067	2055	2043	2030	2016	2001	1985	1969	1953	1935
HH Recycling estimate (tonnes)	993	1023	1052	1082	1112	1141	1171	1200	1229	1258	1287	1316	1345	1373	1402
Household number - GLA (long term trend)	3581640	3627166	3673809	3721010	3768632	3816327	3862315	3906822	3954930	4001054	4047500	4092731	4137533	4181592	4225117
HH kg/household (residual) - GLA	589.1	579.9	570.4	560.9	551.2	541.6	532.2	522.7	513.3	503.8	494.4	485.1	476.0	467.0	458.1
Data Source: Waste DataFlow															
Household number - dwelling stock	3528200	3565850	3598314	3631074	3664133	3697492	3731155	3765124	3799403	3833994	3868899	3904123	3939667	3975535	4011729
HH kg/household (residual) - WDF	598.0	589.9	582.4	574.8	567.0	559.0	550.9	542.6	534.3	525.8	517.2	508.5	499.9	491.2	482.5

Figures from Environmental Strategy  
Projected figures

HH Tonnage projections based on GLA data



**This sheet:**  
Two lines on the graph have been created for kg HH residual waste/household, one each for GLA and WDF household figures. At 2030, there is a maximum difference of just over 25kg between the two.  
It is recommended that NI191 of WDF - kg HH residual waste/household - is used as an alternative measure in the LES, with the aim of achieving 400kg HH residual waste/household by 2030, as the indicator is readily available. This is equivalent to nearly 10kg HH residual waste/household decrease each year.

**N.B.**  
Household and non-household tonnage projections were provided by the GLA (the data which was fed into the London Environment Strategy graph). The LES sets recycling percentages for 2016 and 2030 for both household and non-household; recycling and residual tonnages have been calculated from these at book-end figures.  
GLA and WDF use differing household figures, DCLG and Council Tax base figures respectively. In developing kg/household projections for the GLA, their long term trend projections have been used. WDF figures from 2010-2017 have been used to calculate average percentage household increase and projected forward to 2030.

