

## **P61 Reducing Waste Minor Modifications Justification**

### **1.0 Introduction**

1. After the adoption of the London Plan on 2<sup>nd</sup> March 2021 and after Statement of Common Ground discussions with local residents and community groups, the decision was made to propose the incorporation of Circular Economy principles into P61 Reducing Waste.
2. The aim of Circular Economy principles is to keep materials and products in use for longer, and this in turn reduces waste. The addition of the requirement for Circular Statements focuses more on waste reduction from new development specifically for larger schemes. This assessment in the Circular Economy Statement also applies Circular Economy principles to the built environment more specifically looking at the retaining of building materials and buildings themselves, and assessing if and how retrofit and refurbishment can be used in the first instance.
3. This is required to both align with the New London Plan and respond to comments from local residents and community groups to address the Climate Emergency.
4. It is anticipated that the Circular Economy Statements requirement for major referable schemes is only the first iteration of a process that will develop to enable better implementation of Circular Economy principles in new development, especially in design, operation and disassembly of buildings going forward to ensure the design of new development can make reuse of materials more efficient and easier in the long term.

### **2.0 London Wide Policy Context**

5. The London Plan reflects the Mayor's Environment Strategy, aiming to help cut waste, increase recycling and support the transition to the circular economy. The Mayor is not a waste planning authority and therefore has limited powers to direct where waste is managed. The Mayor has planning powers with referable applications.
6. It is the intention of the GLA that Circular Economy principles will form a key part of the core values that all future resource and waste management services and infrastructure decisions will be made against.
7. The Publication London Plan (2020) in Policy S17 Reducing waste and supporting the circular economy sets out the strategy for collaboration amongst local authorities to reduce waste and promote Circular Economy principles. Policy S17 requires development proposals that are referable to the Mayor of London to submit a Circular Economy Statement as part of a planning application.
8. It states that referable applications should promote Circular Economy outcomes and aim to be net zero-waste. Circular Economy Statements should demonstrate:
  - how attempts have been made to minimise the use of new materials; how all materials arising from demolition and remediation works will be re-used and/or recycled; how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life; opportunities for managing as much waste as possible on site;

- adequate and easily accessible storage space and collection systems to support recycling and re-use;
  - how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy; and
  - How performance will be monitored and reported.
9. London Plan Policy SI7 Part C states that London boroughs are encouraged to apply Circular Economy principles and set their own lower local thresholds for Circular Economy Statements, for example, for 'major development'. The London Plan (2021) encourages Development proposals that are not required to produce a Circular Economy Statement (non-referable schemes or those that are below local thresholds) to apply the Circular Economy principles and processes set out in the GLA's guidance.
10. Paragraph 9.7.3 of the London Plan (2021) sets out that Circular Economy Statements are intended to cover the whole life cycle of development. This will apply to referable schemes and be encouraged for other major infrastructure projects within London. Boroughs are encouraged to set lower local thresholds through Development Plans.

### **Circular Economy principles and Waste targets**

11. The London Plan sets out targets for waste streams to ensure sustainable management of waste and divert materials away from landfill.
12. The Publication London Plan (2021) in Policy SI 7 Reducing waste and supporting the circular economy sets out a number of new targets to achieve a reduction in waste to align with Circular Economy principles. This includes:
- ensure that there is zero biodegradable or recyclable waste to landfill by 2026
  - meet or exceed the municipal waste recycling target of 65 per cent by 2030
  - meet or exceed the targets for each of the following waste and material streams:
    - a) Construction and demolition – 95 per cent reuse/recycling/recovery
    - b) Excavation – 95 per cent beneficial use
13. Circular Economy Statements will set out how much of materials and buildings are used, reused and how these are disposed of in new development. This will inform whether new development is meeting or exceeding the targets for waste reduction in construction and demolition. The potential for new development to achieve the targets for waste reduction is in part indicated by Circular Economy Statements. By assessing whether new development how materials are disposed of from construction and demolition the GLA can assess how much is reused, recycled and recovered.

### **2.0 Evidence Base for London Plan**

14. The London Plan sets out targets for resource and waste management at construction and operational phase. The evidence base and methodology for this are set out in the Waste Topic Paper, as set out in the last section of this note.
15. The London Plan is supported by London's Circular Economy Route Map (2017) which is designed to contribute to meeting the Mayor's target of net carbon zero by 2050. The roadmap sets out opportunities for London to maximise the reuse of

resources and materials to reduce waste and carbon and greenhouse gas emissions. This document sets out possible policy actions to set out a London wide re-use target for built environment projects in London, and to support the development of the market and logistics of reusing materials from development if reuse onsite is not appropriate.

16. Upon the adoption of the London Plan, the London Plan forms a part of the development plan for Southwark alongside its evidence base.

### 3.0 Southwark Context

17. The purpose of P61 Reducing Waste is to reduce the amount of waste arising in the first instance. By applying the waste hierarchy, this will achieve the greatest carbon dioxide equivalent savings.
18. At this stage, Southwark Council has not set a lower threshold for Circular Economy Statements and principles to be met. It proposes to align with the London Plan as a minor modification, as set out below.

#### Proposed minor modifications

19. The Council is proposing Minor modifications to the policy P61 Reducing Waste, if the inspectors are minded to accept these.

20. These would include:

The addition of a new point 4 under Development must:

4. Major Referable development should submit a Circular Economy Statement.

Add sentence to end of reasons paragraph:

The reduction and proper management of waste to reduce carbon emissions is crucial for mitigating against climate change.

Add a fact box for Circular Economy Statements and Circular Economy principles

Circular Economy Principles are:

1. Conserve resources, increase efficiency and source sustainably

2. Design to eliminate waste (and for ease

Of maintenance)

3. Manage waste sustainably and at the highest value

Circular Economy Statements are an assessment of how a development will incorporate Circular Economy measures into all aspects of the design, construction and operation process.

21. Major referable development is new development that fits the following criteria, as set out in the Mayor of London Order (2008). This criterion includes: development of 150 residential units or more; development of over 30 metres in height (outside the City of London); and development on Green Belt or designated Metropolitan Open Land.
22. The Council will be led by guidance from GLA on Circular Economy Statements, it is anticipated that further guidance will be released by the GLA, as set out in Paragraph 9.7.3 of the London Plan (2021) to assist with the introduction of Circular Economy principles.

#### **4.0 Implementation of these minor modifications**

##### **How do Circular Economy Statements ensure Circular Economy principles are met?**

23. It is a requirement to submit a Circular Economy Statement to the GLA for major referable schemes, as set by the mayor.
24. The GLA sets out guidance for applicants on how to prepare and submit a Circular Economy Statement. This guidance went out to consultation from October 2020 to January 2021. Southwark Council submitted a response to this consultation, and expressed a need for further guidance on the monitoring and assessment of these statements as a Local Authority.
25. With regard to testing how applicants meet the circular economy policy there are three key principles.
26. The first principle is 'Conserve resources and source sustainably'. This means the reduction in quantities of material that are able to be redone. The design of the schemes should reduce the demand for building materials by prioritising refurbishment over demolition, focusing on building less and building more efficiently. Circular Economy principles also apply to energy, water, land and ecosystems. New development should specify and source materials and other resources responsibly and sustainably, this includes detailing the use of reused and recycled materials.
27. The second is 'Design to eliminate waste (and for ease of maintenance)'. This relates to how new development is designed, for easy disassembly and recycling of materials, but also of the building as a whole. New development should utilise both design and construction methods that reduce waste at source, planning for the reduction of waste from materials from inception to strategic planning to end of life. The design should be for longevity, adaptability or flexibility and reusability or recoverability of buildings and materials.
28. The design process should assess the ability of the development proposal to facilitate change, and how it will be reconfigured or remodelled to ensure the longer life of buildings and materials.
29. Design of new development should build in flexibility and include for instance a relocatable, modular internal partition system. This would ensure that the Development can be flexible and reconfigure without additional materials, therefore reducing waste and embracing reuse principles for materials and buildings through design.

30. The third is to 'Manage waste sustainably and at the highest value.' In terms of assessment, this means identifying where measures have been taken for the effective management of waste sustainably including waste arising from demolition, excavation, construction and municipal and industrial waste. This should be managed as high up the waste hierarchy as possible.
31. Excavation waste is difficult to manage, but landfill should be a last resort, and the priority should be to reuse the excavation waste. The transportation of waste must be demonstrated to be sustainable as well, including the consolidation of trips, reduction of journey length and the utilisation of cleaner transport modes.

### **What are the requirements for the submission of a Circular Economy Statement?**

32. There are a number of different components, including appendices, to the Circular Economy Statement submission.
33. This includes a number of reporting forms to ensure the effective monitoring and feedback to ensure that Circular Economy principles are met not just on submission but on completion and operation, and eventually refurbishment or demolition.
34. A pre-demolition audit is a requirement for most Circular Economy Statements, this sets out an audit of the potential of materials and the building for reuse and refurbishment or demolition. A 'Bill of Materials' must also be provided by applicants to demonstrate that the development considered the conservation of resources through the application of lean design principles and to source materials sustainably. Other supporting documents may be required depending on the specific commitments made in each development.

### **How are Circular Economy Statements assessed?**

35. To be policy compliant with the London Plan (2021), Circular Economy Statements must adhere to minimum content requirements. Applicants are encouraged to exceed this by adopting more ambitious strategies and targets.
36. At pre-application/outline and detailed planning application stages, the Circular Economy Statements will be assessed for completeness, are all the supporting documents completed and has the applicant demonstrated Circular Economy principles have informed the new development proposal. For technical validity, the Statement should set out relevance of the commitments to the proposal, and demonstrate how reasonable steps have been taken to explore options for meeting circular economy target, and identify if there a sufficient process to monitor stated targets in the statement.
37. The statements which go beyond the minimum content requirements are considered to be 'pioneering'. A 'pioneering' statement will include additional commitments to meeting the Circular Economy principles. This is achieved by: showing depth by exceeding minimum policy requirements; and/or showing breadth by setting additional targets to demonstrate that a broad range of measures have been investigated.

38. There is a narrative portion of the statement to set out non-quantitative aspects of meeting Circular Economy principles. This explains how the principles have been explored and met and details any other benefits for occupants, neighbours or local authorities.
39. London Plan Policy SI7 part B (6) states that referable applications need to demonstrate how performance of the Circular Economy Statement will be monitored and reported. This must include:
- what actually happened
  - how this is different from what was planned
  - why it differed and what the key learnings were
40. This will be sets out in the post-completion section of the statement.
41. Development must meet certain thresholds in construction phase and operational phase to be policy compliant. This is required for major referable schemes currently, as set out in the London Plan and the need for waste reduction is reiterated in NSP policy P61 Reducing Waste.
42. It is anticipated that the process of assessing Circular Economy Statements at Southwark will be an iterative one, and any learnings will inform the early review to explore a Southwark wide lower threshold for the submission of Circular Economy Statements depending on the success of the implementation of the London Plan requirement for major referable schemes to have Circular Economy Statements.

### **Monitoring Circular Economy Statements**

43. The GLA will do separate monitoring of the Circular Economy Statements that they receive. The statements are submitted and assessed at pre-application, full application stage, and post-planning/completion updates. The planning application process will determine if modifications will be needed, and this is likely to be from the construction phase onwards.
44. As set out in the Monitoring Framework under P61 Reducing Waste, the planning policy team at Southwark Council will monitor the number of Circular Economy Statements and its implementation, and what is achieved at each stage. The monitoring will also include what appendices and supporting documents were provided, to assess the types of actions and interventions explored and implemented in new development proposals. This will assist the council in gaging how successful the Circular Economy Statements are at reducing waste, and help to identify where carbon is reduced in this process of meeting Circular Economy principles and we can legislate for that in the early review.
45. This is likely to evolve as Circular Economy Statement guidance progresses.

## 5.0 Early Review

46. As set out in the London Plan paragraph 9.7.3, Local Authorities are encouraged to set out their own lower thresholds for development to produce Circular Economy Statements and apply Circular Economy principles to new development. The use of Circular Economy principles to inform new development both reduces waste and carbon, contributing to both climate change adaptation and mitigation.
47. It is the intention of the council that under the early review, an assessment will be made of the process and success of Circular Economy Statements for major referable schemes and assess the impact that these statements have had on new development and material use. Then it will be reviewed if this would also be effective for all major schemes.

## 6.0 Summary

48. NSP61 Reducing Waste with the inclusion of the requirement is sound because it is consistent and in general conformity with the London Plan, and ensures the reduction of waste for new development to aim to meet waste reduction targets and simultaneously reduce carbon emissions and improve environmental quality.

## 7.0 References

- GLA (2020) Circular Economy Statement Guidance - <https://www.london.gov.uk/publications/circular-economy-statementguidance#:~:text=Circular%20Economy%20Statements%20are%20intended,design%2C%20construction%20and%20operation%20process>.
- GLA (2020) Waste Topic Paper for the London Plan 2021 - [https://www.london.gov.uk/sites/default/files/london\\_plan\\_topic\\_paper\\_on\\_waste.pdf](https://www.london.gov.uk/sites/default/files/london_plan_topic_paper_on_waste.pdf)
- GLA (2017) Circular Economy Route Map -- [http://asbp.org.uk/wp-content/uploads/2017/06/LWARB-London%C2%B9s-CE-route-map\\_16.6.17a\\_singlepages\\_sml.pdf](http://asbp.org.uk/wp-content/uploads/2017/06/LWARB-London%C2%B9s-CE-route-map_16.6.17a_singlepages_sml.pdf)