



**Draft London Environment Strategy
Consultation November 2017
A response by the #OneLess campaign**

#OneLess^{1,2} is a collaborative and innovative campaign, working to transform London into a city free from single-use plastic water bottles, and connect Londoners with the ocean. #OneLess is led by the Zoological Society of London (ZSL), Forum for the Future, Communications Inc., and the Thames Estuary Partnership.

Overarching comments

We welcome the opportunity to comment on the Draft London Environment Strategy and would like to congratulate the Greater London Authority (GLA), and the Mayor on his ambitious and inspirational policies and proposals. We are fully supportive of the process to develop and implement this new environment strategy, and are pleased to see the holistic approach the Mayor has taken. However, we do believe there are certain areas of the strategy that can be strengthened and improved for the benefit of the environment and people alike.

This response focuses on the Green Infrastructure and Waste chapters of the draft strategy. For detailed comments on other areas of the strategy, we would like to reference and support the responses submitted by our member organisations, the Zoological Society of London (ZSL) and the Thames Estuary Partnership (TEP).

We are pleased to hear that the Mayor will *“do what’s necessary to safeguard London’s environment over the longer term,”* and we welcome the aspiration for London to become the *“greenest city in the world.”* We would however like to state in the offset that we want to see more recognition of London’s ‘blue spaces’; its waterways, rivers and estuaries; and recognition of London’s connection to the ocean and impact upon the ocean.

Chapter 5: Green Infrastructure

We would like to firstly reference the response submitted by ZSL, which we fully support, and would like to highlight in particular the following points relating to this chapter:

- We are disappointed to see that rivers are not included in the Green Infrastructure priorities or vision, especially as the Thames is an essential habitat for hundreds of species including many which have been identified as Features of Conservation Importance (FOCI) or cited in the UK Biodiversity Action Plan;
- We would like to see that London’s ‘blue’ is just as valued as the ‘green’;
- We would like to see a clear statement within the London Environment Strategy that ‘green’ also means ‘blue’;

¹ www.OneLessBottle.org

² Contact details: Fiona Llewellyn, #OneLess Project Manager, fiona.llewellyn@zsl.org, 02074496483

- We think the rivers and streams of London should have their own paragraph in the opening pages of the Green Infrastructure chapter (pg. 132- 135) and should be recognised as a significant component of a National Park City.

This #OneLess response concentrates on public access to drinking water whilst ‘on the go’ in London, which we believe should be a vital component of London’s green infrastructure ambitions.

It is our view that public drinking water fountains and refill points must be included as one of the attributes of a National Park City, having benefits to both the environment and to human health. Easy and free access to drinking water ‘on the go’ complements all of the components of the ‘green infrastructure’ policies outlined on pg. 125 of the draft strategy. Water fountains can help encourage healthy living through free and easy hydration; and should be considered key infrastructure for the encouragement of walking, cycling, and other outdoor activities, in line with the ‘exercising, playing and relaxing’ facilities needed for London to become a National Park City.

A recent OnePoll survey revealed that 42% of Londoners **only** use bottled water when ‘out and on the go’.³ Easy access to drinking water enables and encourages people to use refillable bottles, rather than relying on purchasing water in single-use plastic bottles when on the go. Using a refillable bottle instead of single-use plastic water bottles is less polluting to land, waterways and the ocean. The #OneLess campaign is working to change the predominant drinking water behaviour in London away from bottled water to refilling, to reduce the amount of plastic entering the ocean from our capital city. For this to successfully happen, there needs to be adequate drinking water infrastructure across London, in both private and public spaces.

It is our view that there is the opportunity to integrate drinking fountains/ refill points throughout London’s green spaces as standard. We already see this happening in some of London’s parks, but there is the opportunity to expand this infrastructure further, and we would like to see this included within the Green Infrastructure chapter of the Environment Strategy.

We support and encourage the exploration of new funding streams for green infrastructure projects, and would like to see this extended to the installation, maintenance and promotion of public drinking fountains/ refill points.

In summary:

- 1) An objective to increase public drinking water fountains and refill points across London should be included in the London Environment Strategy and within the National Park City policies. Additionally, this objective should be captured within the London Plan and the Transport Strategy.**
- 2) We urge the Mayor to:**
 - a) Advocate for London to ‘go #OneLess’ and become the first capital city in the world that does not use polluting single-use plastic water bottles;**
 - b) Champion a ‘refill revolution’ across the city, encouraging a city-wide behavioural switch to refilling;**
 - c) Work and innovate with businesses, landowners, NGOs and local authorities, to ensure the drinking water infrastructure is in place across London to support this transition.**

³ BRITA and OnePoll survey, 2016

Chapter 7: Waste

Recycling

We welcome the ambition for London to become a **zero waste city by 2026**. However, the draft strategy currently places too much emphasis on recycling and not enough on reduction and reuse. This is particularly key when considering that *“landfills accepting London’s waste [] are expected to close by 2026 with no new capacity planned”* (pg. 265).

The amount of single-use plastic that London, the UK, and the world are currently using and disposing of is unsustainable and needs to be addressed as a matter of urgency. While we welcome ambitions to recycle more materials, including plastic, it is crucial that efforts are directed towards reducing the amount of plastic entering the system, especially when considering single-use plastic.

More onus needs to be placed on businesses and manufacturers to ensure that the products and associated waste they are producing and selling are reduced and reused as much as possible, and where this isn’t possible, that they are fully recyclable. As such, and in-line with Defra’s Waste Hierarchy Guidance,⁴ we support the proposal to move towards more circular business models that design out waste in the first place.

We 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. We believe this will help reduce confusion, and should sit alongside action to streamline waste management infrastructure.

Single-use packaging

We welcome the initial action outlined on pg. 253, ***“significantly cutting waste and encouraging reuse to minimise the use of virgin resources. Efforts will be focused on reducing food waste and single-use packaging as they offer the biggest opportunity for change.”***

We are pleased to see reference to the impact plastic bottles have on the ocean within the draft strategy (pg. 273), but would like to see further recognition of London’s connection to the ocean via the River Thames.

We are also pleased to see specific reference to the need for action to reduce single-use plastic **water** bottles. In London, adults get through more than 1.2 billion single-use plastic water bottles every single year. We need a city-wide, collaborative systematic shift away from using single-use plastic water bottles, to refilling becoming the social norm, and this is what the #OneLess campaign is working to achieve.

We are engaging and mobilising forward-thinking businesses, land-owners, institutions, brands and organisations; working with them to ‘go #OneLess’ and develop the infrastructure and systems they need to support a refill culture, such as the organisation-wide provision of refillable water bottles and refill points. We are asking these leaders to champion and communicate the issue to their networks, audiences, and circles of influence – and we are providing materials to help them do this.

⁴ Defra (June 2011). Guidance on applying the waste hierarchy.
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69403/pb13530-waste-hierarchy-guidance.pdf

#OneLess is now gaining momentum across London, with many pioneers already stopping completely or phasing out their use of single-use plastic water bottles and embracing a refill culture (e.g. Selfridges, Sotheby's, Estee Lauder, Borough Market, Kings College London, ZSL London and Whipsnade Zoos, Broadgate Estates, 15Hatfields, and others).

Key to the success of the #OneLess campaign is increased access to drinking water 'on-the-go' across London, as noted above, including: more drinking fountains in both public and private spaces, and across our transport systems, as well as welcome access to refilling points and tap water in shops, restaurants, visitor attractions and venues. This is evidenced by a survey conducted by BRITA and Keep Britain Tidy in 2017, which reported that London respondents were most likely to purchase a bottle of water when travelling long distances (e.g. by bus, train or aeroplane) (61%), when 'out and about' during the day (43%), and when going to special event (e.g. theatre or sports) (42%).⁵

To help facilitate this infrastructure improvement and subsequent 'culture-shift', a change at the planning and policy level is needed. This may, for example, include incentives in planning for both residential and commercial new-builds and refits, to encourage drinking fountain installation in buildings, public transport stations (especially larger commuter hub stations) and London venues etc.

We would like to see the Mayor (and central government more broadly) commit to improving public access to drinking water, by scaling up drinking water infrastructure in public spaces (as outlined above), such as parks and transport systems, and by implementing changes at the planning and policy level. We recommend that the current review of the 'The London Plan' incorporates planning and policy language to encourage innovation around access to drinking water in the public realm, new developments and regeneration projects.

We welcome **proposal 7.1.1b "The Mayor will support campaigns and initiatives to cut the use of single-use packaging"** (pg. 273). However, we would like to see stronger ambition here; rather than simply supporting, we would encourage the Mayor to help spearhead such campaigns. This would dramatically increase the reach of the messaging on single-use plastic across London, and would help to achieve global recognition for London as a leader and an innovator in tackling the blight of single-use plastic, which is a major threat, not just to our city, but to the world's ocean and our health.

"The Mayor calls on food and drink businesses to offer incentives for their customers to use their own reusable drink cups and water bottles" (p. 273). In our view this is not the most effective approach. What is the incentive for the business to offer incentives? It is not just about customer incentives, it is about business responsibility and innovation to ensure reusable options are prioritised and promoted over single-use options.

With regards to drinking water specifically, we disagree with the action to **"investigate the feasibility of a deposit return scheme for water bottles"** (p.275). In our view, this is a more complicated and expensive approach to switching to a refillable drinking water system across London. Single-use plastic water bottles provide the best opportunity for a massive **reduction** in the amount of plastic waste entering the system in the first place. We do agree with the need for a national deposit return scheme for other (non-water) beverages packed in single-use plastic bottles, and the above action should be amended reflect this, e.g.: "In-line with national action, investigate the feasibility of a deposit return

⁵ BRITA, Keep Britain Tidy and Centre for Social Innovation. (April 2017). 'Understanding provision, usage and perceptions of free drinking water to the public in the UK.'

scheme for (non-water) single-use plastic bottles.” However, with safe and clean drinking water available out of the tap in the UK, we believe that with regards to single-use plastic **water** bottles, refilling is the simplest, quickest, most cost-effective and environmentally sustainable alternative.

In principle, we welcome the action to, **“work with stakeholders including environment groups, Transport for London and LWARB to improve access to tap water through community water refill schemes building on existing schemes”** (pg. 275). However, we would like to understand what the Mayor means by ‘community refill scheme’, and would offer caution in the use of this language. We want to normalise refilling, rather than it being seen as a ‘community scheme’, or something unusual. We would like to work with the GLA on the best approach to expanding refill points and access to tap water across London. Communication around this will be key and we would recommend a city-wide advertising campaign at the appropriate time to promote and help improve access to drinking water. Further, we recommend that the Mayor seeks to work with a well-established and widely used app that drinking water locations/points across London can be integrated into, rather than creating a brand new app that would be competing in a very crowded ‘app space’. This approach would make it easy for people to know where to refill, and in our view, using an existing and well-known app that many people already have (such as Google maps or CityMapper), would help to normalise the shift towards refilling.

We do not believe the action to **“work with the GLA group to reduce bottle sales and improve access to tap water on our premises”** (pg. 273) is ambitious enough. If the Mayor truly wants to reduce single-use packaging across London, he should lead by example and commit to stopping the sale of single-use plastic bottled water on all GLA premises. This has been very successfully done by others in London as part of our #OneLess campaign, including Selfridges and ZSL London Zoo. This should be integrated into **Proposal 7.1.1d “The Mayor will lead by example to cut waste and encourage reuse through the GLA group’s operations and procurement activities”** (pg. 276).

By adopting the #OneLess approach and removing the need for single-use plastic water bottles in London, the Mayor can significantly reduce the amount of single-use plastic that needs to be dealt with across London. **Additionally, we urge action on other single-use items, such as cotton buds, wrappers, takeaway containers, straws etc. that make up the top 10 litter items found in the River Thames.**⁶ We would like to see these included as target items for reduction across London, and in this, we highlight and support the important work of Thames21.⁷

In summary:

- 1) We strongly recommend that the Mayor should seek to implement a city-wide switch from using single-use plastic water bottles, to refilling. This is an ambitious, yet achievable aspiration, that is very much in-line with London becoming the ‘greenest city in the world.’**
- 2) Further, we call on the Mayor to:**
 - a) Take the ‘#OneLess pledge’ to personally stop using single-use plastic water bottles;**
 - b) Make an organisational commitment for the GLA as a whole to phase out single-use plastic bottles by the end of 2018;**
 - c) Proactively encourage London businesses to stop using/ selling single-use plastic water bottles;**
 - d) Call on his national peers to create a ‘refill revolution’ throughout parliament.**

⁶ Thames21 River Watch data (2017). <https://www.thames21.org.uk/thames-river-watch-litter/>

⁷ <https://www.thames21.org.uk/>