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29 September 2015

RE: North London Waste Plan (NLWP) Regulation 18 consultation

Dear Mr Onslow,

Thank you for providing the North London Waste Authority (NLWA) with the opportunity to respond to the consultation into the draft Regulation 18 NLWP.

As you are aware, the North London Waste Authority is the second largest waste disposal authority in England, handling around 3% of national municipal waste collected by the seven London boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest.

The Authority has a statutory responsibility for providing municipal waste disposal services for its seven constituent borough councils and powers to arrange for the reuse, recycling and composting of municipal waste too. As referenced in the draft NLWP the Authority is currently in the process of developing an application for a Development Consent Order for a new Energy Recovery Facility (to replace the existing plant) and associated operations at the Edmonton EcoPark in north London which if granted would secure a long term solution for residual waste management within the area. The Authority principally provides services at present through LondonWaste Ltd, which operates treatment and transfer facilities at Edmonton, Islington and Hendon along with seven re-use and recycling centres (eight RRCs from October 2015 when the Barnet site transfers, leaving only the Enfield RRC being operated by the borough council). However, in 2013/14 approximately 260,000 tonnes of local authority collected waste was 'managed' outside north London.

The Authority also owns an additional site in Haringey, referred to as the 'former Friern Barnet Sewage Works' at Pinkham Way. NLWA bought part of the Pinkham Way site from London Borough of Barnet. The other part of the site remains in London Borough of Barnet's ownership. Assuming that the Authority can secure planning permission for suitable residual waste management facilities at the Edmonton EcoPark site it now has no immediate plans to develop the Pinkham Way site in Haringey for such use. However, Pinkham Way will remain an asset for the North London Waste Authority due to its strategic location and planning designation as an employment site. Accordingly the Authority is pleased to see it included in the Plan as an area for future waste use, potentially contributing to meeting London Plan targets which aim to 'manage' 100% of London's waste within the capital by 2031 and supporting progress towards the North London Joint Waste Strategy target of 50% re-use, recycling and composting by 2020. The central location of the site within the NLWA seven-borough area also means that it provides potential benefits to reduce the cost and environmental impact of road transport by reducing the need for collection vehicles to travel to more distant sites. This site is therefore of strategic importance to both the Authority and the north London boroughs.

The attached is our final response following approval at the Authority meeting on 25 September 2015.

If you require any further clarification of the points or have any other queries please do not hesitate to contact me.

Yours sincerely,



David Beadle
Managing Director
North London Waste Authority

1.0 Question 1.

Do you agree with the proposed Aim for the draft NLWP? If not, please suggest an alternative?

1.1 Yes – NLWA agrees with the proposed aim of the draft NLWP.

2.0 Question 2.

Do you agree with the proposed Draft Objectives for the draft NLWP? If not, please suggest an alternative and/or additional objectives.

2.1 NLWA agrees with the majority of the proposed draft objectives but has comments on the following:

2.2 NLWA proposes that the first three strategic objectives (SO1-3) should explicitly have greater weight than the other five objectives (SO4-8) as they are of a much more fundamental nature concerning **what** should be done, rather than **how** it should be done.

2.3 *Objective SO3* – refers to working towards net self-sufficiency. However at paragraph 6.13 the draft Plan refers to Option 3 net self-sufficiency for LACW, C&I and C&D waste being the preferred option for the Plan. Objective SO3 should reflect the preference expressed later in the document for net self sufficiency.

2.3.1 As a matter of principle NLWA supports land being available for all local waste arisings. There is a need to make more land available than might seem rationally needed to allow for the fact that not all new developments will come successfully through the planning system e.g. if proposed developments face significant opposition. Accordingly the Plan needs to provide for the varied opportunities for success. NLWA is therefore pleased to see that the draft Plan goes beyond the apportionment targets set by the Mayor of London for the amount of waste that the seven boroughs should provide for and towards 100% self sufficiency. The Authority had previously argued (in its response to the launch consultation) for self sufficiency and is still of the view that this should be an aim of the Plan. In the launch consultation response NLWA argued that it,

“would therefore recommend that the new NLWP contains an objective to go beyond the boroughs’ collective apportionment targets. The Authority is particularly keen it should be possible to manage 100% of the municipal waste stream within north London as there appear to be much greater challenges to securing planning permissions for municipal waste facilities outside a local authority’s boundaries than there are for commercial wastes crossing administrative boundaries. Our response to the old NLWP Preferred Options consultation is available at <http://www.nlwa.gov.uk/consultations/our-responses> ; see the Authority’s response to Question 1.”

2.3.2 NLWA is pleased that this recommendation is now included as an objective in the Plan and accepts that the objective relates to net self sufficiency, reflecting the fact that waste moves both within and out of north London so it should be net self sufficiency that is being aimed for.

- 2.4 *Objective SO4* – refers to the requirement for all waste developments to accord with high standards of design and build quality, an objective which is further reflected in Policy 6. In NLWA's view this objective should be changed to 'appropriately high standards' to reflect the fact that the standard of design for a small waste transfer station may be very different to the standard of design that is appropriate for a major new municipal facility such as in NLWA's on-going development consent order (DCO) application at the Edmonton EcoPark.
- 2.5 Design will also be affected by responses to local consultation on proposals so we consider that it is not appropriate for the NLWP to set an absolute objective relating to 'high standards of design'.
- 2.6 In terms of impact on amenity it is also important that waste developments, particularly on new sites, are assessed against realistic expectations, and that whilst it will always be important to minimise impacts as far as reasonably possible, assuming development proposals are coming forward on sites and in areas designated by the Plan (or on other sites that are suitable in accordance with Plan criteria), development management decisions shall appreciate that some impacts are inescapable. For example, waste management sites will certainly have transport impacts, so developers can only be asked to minimise them wherever feasible, not to stop them all together.
- 2.7 *Objective SO6* – refers to the requirement for the Plan to provide opportunities for north London to contribute to the development of low carbon industries and decentralised energy. NLWA is concerned that this objective may lead to onerous obligations to contribute financially to the development of low carbon industries and decentralised energy. NLWA would like to see this objective amended to say that the Plan should 'provide opportunities for north London to contribute to the development of a *low carbon economy including where appropriate, decentralised energy in line with London Mayoral objectives.*'
- 2.7.1 By making the proposed amendment NLWP would be brought in line with London-wide approaches to decentralised energy and better reflect the waste management priority for the Plan as opposed to energy generation.
- 2.8 *Objective SO8* – sets an objective for the Plan to protect and where possible enhance north London's natural environment, biodiversity, cultural and historic environment.
- 2.8.1 NLWA is pleased to see that the requirement for enhancement has been caveated to 'where possible', however the practical application of this objective, (and we provide further comment on Policy 6 at a later point in this response), may be quite difficult to achieve. For example it could be difficult for new waste facilities to enhance the historic environment.
- 2.8.2 Whilst NLWA understands the desire to include objective SO8, e.g. to bring the Plan into line with other local planning approaches, we would like to note that the practical applicability of this objective may be somewhat difficult to operate in practice, and should not place undue burdens on publicly-funded waste facilities.

3.0 Question 3.

Do you agree with the draft spatial strategy for the NLWP? If not, please provide further detail and any alternative approaches.

- 3.1 At paragraph 4.5 there is a list of requirements for the NLWP which set out the spatial strategy for the Plan. However, as these spatial strategy requirements don't exactly accord with the objectives or policies listed elsewhere in the document it is somewhat unclear how they relate to the objectives and policies in the plan. For example spatial strategy requirement F which is to 'Support sustainable modes of transport' appears to duplicate objective SO7 'To support the use of sustainable forms of transport and minimise the impacts of waste movements including on climate change; Met through Policy 6'. Policy 6g then states that:
'Applications for waste management facilities and related development, including those replacing or expanding existing sites, will be required to demonstrate to the satisfaction of the relevant council that:
g) active consideration has been given to the transportation of waste by modes other than road, principally by water and rail.'
- 3.2 NLWA suggests that section 4 of the Plan is reworked to explain how the spatial strategy requirements listed in paragraph 4.5 relate to the objectives and policies of the draft Plan.
- 3.3 NLWA supports *Requirements A, B and C*, and also has a number of detailed comments on Section 4 of the draft Plan (if it is retained) as follows:
- 3.4 At paragraph 4.13 we recommend that for clarity, the abbreviated wording of NPPW (National Planning Policy for Waste) is written in full even though the full name and abbreviation have been used at paragraph 1.5.
- 3.5 *Figure 7 (after paragraph 4.14)* is missing the RRC at Barrowell Green, Enfield.
- 3.6 *Requirement D - Provide opportunities for decentralised heat and energy networks:* Paragraph 4.15 refers to the spatial strategy Requirement D regarding the provision of opportunities for decentralised heat and energy networks. The paragraph in particular refers to the concentration of existing and new waste sites in the Lee Valley corridor creating good opportunities for developing connections to decentralised heat and energy networks. However, this concentration only creates opportunities for decentralised heat and energy if the waste sites are big enough for cost-effective treatment facilities that in particular produce energy and heat. The new 'areas' approach to the allocation of land for waste use whereby this draft Plan allocates both individual sites as suitable for waste use as well as areas for waste use, may help to deliver this opportunity. However, the safeguarded waste transfer stations may well be too small for cost-effective treatment and therefore as potential sources of heat.
- 3.6.1 There is no mention in the Plan about whether there is an opportunity to consolidate a number of small sites and for the replacement for these multiple small sites to be one more economically attractive larger site. The closure of small transfer stations which also act as recycling sorting depots for example may be much better replaced with a single larger processing site than a straight 'like for like' replacement of what was in place before. It would be helpful in our view if the Plan made some comment

about this opportunity, as north London is likely to require more treatment facilities and fewer transfer stations if it is to achieve net self sufficiency.

3.6.2 Both a paragraph 4.15 and in Figure 6 there is reference to “decentralised energy opportunity areas” as opposed to the “potential areas for decentralised heat”. It is unclear to us if the Plan is referring to large-scale direct-wire electricity that bypasses the national grid. NLWA recommends that the same terminology is used throughout when referring to these areas and that a definition is included in the glossary in Appendix 3.

3.6.3 The last sentence of paragraph 4.15 refers to all developments in areas (but not sites?) in the Lee Valley being expected to ‘contribute’ to the decentralised energy network that is proposed here, as well as contributing to the additional aim outlined elsewhere in paragraph 4.15 for waste development with CHP. We are concerned about this requirement as it seems to suggest that all waste facilities must either have CHP and/or be connected to the proposed decentralised energy network. However, where this is not possible or appropriate (e.g. for a new materials recycling facility) is the Plan suggesting that a financial contribution to the costs of the decentralised energy network is required instead? We do not think it appropriate for the Plan to require financial contributions to schemes such as the Lee Valley Heat Network; rather the planning requirement should be that appropriate waste treatment technologies are ‘CHP-ready’, leaving the commercial terms of actual heat supply to later negotiations.

3.7 *Requirement E - Reduce impact on local amenity:* Paragraphs 4.16 and 4.17 set out the requirements in order to meet the spatial strategy aim of reducing impact on local amenity. The last sentence of paragraph 4.17 refers to the requirement set out in Policy 6 for the development of enclosed facilities only. NLWA supports Policy 6 where environmental permitting requires it, but not where it doesn’t.

3.7.1 The Authority also considers that it would be appropriate to exempt RRCs from Policy 6a as these do not ordinarily need to be enclosed.

3.8 *Requirement F - Support sustainable modes of transport:* Paragraph 4.18 refers to the spatial strategy aim of supporting sustainable modes of transport. The opening sentence of this paragraph appears to make a virtue of current rail transportation. However, the paragraph goes on to acknowledge that the Brent Cross Cricklewood (BXC) development will require the Authority’s existing rail transfer station at Hendon for redevelopment. CPO processes have already commenced to deliver the Brent Cross Cricklewood scheme.

3.8.1 Section 9 of the draft NLWP refers to the transport related policies in the draft Plan and specifically notes at paragraph 9.31 that:

“Waste and recyclables require transportation at various stages of their collection and management. North London is characterised by heavy traffic on all principal roads. That is why developers need to make every endeavour to use non-road forms of transport if at all possible and to set this out in a Transport Assessment. In North London there exists considerable potential for sustainable transport of waste as part of the waste management process. There are a number of railway lines and navigable waterways in North London including the Regents Canal and the Lee Navigation. It is existing practice to transport waste by train and pilot projects have

taken place to transport waste by water. Developers are required to demonstrate that they have considered the potential to use water and rail to transport waste.”

3.8.2 However, even though both rail and water transport will be preferable from an environmental point of view for taking large quantities of homogenous wastes for treatment outside of London, as the Plan develops and more treatment facilities are provided in north London in accordance with the self-sufficiency targets, the optimum way of handling these wastes may be to collect them as at present in relatively small vehicles and to then bulk them up into relatively large lorry loads for cost-effective road-transportation to such new north London treatment facilities. So whilst paragraph 4.19 refers to reducing the exports of waste from north London it is important to recognise that this approach to minimising exports is likely to have implications for the type of transport that is most appropriate to use for transporting waste these shorter distances. It is recommended that a caveat on paragraph 4.19 is added to reflect this and that at paragraph 4.18 the reference to opportunities for transportation by water at Edmonton should be caveated with a comment about the commercial reality of transporting waste by water over short distances.

3.9 *Requirement G - Reduce exports of waste:* It may be useful for the Plan to acknowledge here that waste imports happen now too. We would therefore recommend that in the body of the paragraph that there is reference to net self sufficiency and the import of waste to north London. In LACW terms the main element of imports is currently Hertfordshire's LACW coming into the energy-from-waste facility at Edmonton.

4.0 **Question 4.**

Do you agree with the NLWP taking forward the Preferred Options of Option B: Growth, Option II: Maximised Recycling to meeting Option 3: Net self sufficiency for LACW, C&I and C&D waste streams? If not, please state why and suggest an alternative Option.

4.1 NLWA agrees that the NLWP should take forward the option B of growth for modelling purposes, as opposed to modelling based upon 'no growth' in waste arisings over the plan period or 'minimised growth'. The Plan notes that Option B of (waste) growth is closely aligned with the Greater London Authority's (GLA) modelling which has been independently tested throughout the London Plan (the spatial strategy for London) examination process. In relation to NLWP's projections for arisings of local authority collected waste during the plan period and the growth rates assumed for waste/recycling target achievement, it is clear that the volume of waste will determine the facility and therefore land requirements for new waste management facilities in the area so it is important that the projections are as robust as possible. The NLWP uses information obtained from the NLWA Waste Forecasting Model developed for the Need Assessment to project household waste arisings for the period up to 2031 for the proposed replacement Energy Recovery Facility at the Edmonton EcoPark (available at: <http://www.northlondonheatandpower.london/document-library> - 'Interim Need Assessment'). While the NLWA and NLWP projected arisings are largely in alignment, because the NLWP has adopted a slightly different approach to modelling, based on population rather than gross domestic household income, there are minor differences in the results which are not unexpected. NLWA officers will continue to work with those producing the NLWP to better understand the respective approaches and assumptions applied, and where key differences lie.

- 4.2 NLWA also agrees that the NLWP should take forward modelling Option II (in relation to maximising recycling) as opposed to modelling based upon Option I (current levels of recycling/recovery) or Option III (maximised recovery/median recycling). The draft NLWP notes that Option II is aligned with EU, national, regional and local targets and although it results in a higher land requirement than the other options, NLWA considers that it is most appropriate to develop a plan which is in line with existing targets on recycling and recovery. This will also have the benefit of making more land available to waste management developers, which should make it easier to make progress towards relevant planning and waste management targets sooner.
- 4.3 Lastly NLWA also agrees that Option 3 in terms of self sufficiency should be taken forward, i.e. planning for net self-sufficiency in managing local authority collected waste (LACW), commercial and industrial waste (C&I) and construction and demolition waste (C&D) generated in north London. As a matter of principle NLWA supports land being available for all local waste arisings, however, in practice Option 4: 'complete self sufficiency' may not be realistic as waste does flow across boundaries of planning areas.
- 4.4 As already noted there is a need to make more land available than might seem rationally needed to allow for the fact that not all new developments will come successfully through the planning system e.g. if proposed developments face significant opposition. Accordingly the Plan needs to provide for sufficient opportunity in practice for success for applications for new facilities, and Option 3 would do that. The Authority has also previously argued (as quoted in paragraph 2.3.1) that the north London planning authorities should go beyond the Mayoral apportionment targets in the new NLWP, so it is pleasing to see that a comment we have previously made is being acted upon in this draft.
- 4.5 New treatment facilities have to be built in north London not only because of the London Plan and NLWP, but also because most exports would appear to be residual waste going to landfill sites, and the Landfill Directive coupled with landfill tax is driving waste away from landfill and into new treatment facilities that are generally best built closer to where the waste arises.
- 4.6 As well as the statutory drivers for building new treatment facilities, there are both cost and practical, end-of-life drivers too. The Authority budgeted to spend just over £13 million in the NLWP base year 2013/14 on landfill tax alone, although we have also been reconfiguring services to minimise this cost. Our existing energy-from-waste facility at the Edmonton EcoPark which treats around 540,000 tonnes of municipal waste per year is also nearing the end of its operational life.
- 4.7 Therefore, the Authority has around 800,000 tonnes of waste per year that either goes to expensive and unsustainable landfill outside of north London, to recycling and composting facilities outside of north London or is treated in an energy-from-waste facility that will need to be replaced.
- 4.8 Accordingly in order to manage more of north London's waste within the capital; in order to manage a greater proportion of it by waste management solutions that don't involve landfill; and in order to accommodate the requirements of the

additional waste generating residents of north London, we argue that new facilities are required and additional land needs to be allocated for this

5.0 Question 5.

Do you agree with how waste management needs will be met as set out in 'Provision for North London's Waste to 2032'? If not please suggest an approach.

5.1 Section 7 relates to the provision for north London's waste to 2032. NLWA's comments on this section of the draft Plan are as follows:

5.2 At the text box table after paragraph 7.1 (page 53) reference is made to NLWA managing two transfer stations at Hendon and Hornsey Street. The road transfer station at Edmonton is omitted from the list, i.e. NLWA manages three transfer stations not two. This should be corrected for the next draft of the Plan.

5.3 NLWA agrees with the outline in section 7 of the draft Plan regarding the provision for north London's local authority collected waste to 2032, however as this section of the draft Plan combines the provision for local authority collected waste (LACW) and commercial and industrial (C&I) waste over which NLWA has no management control or responsibility it is not possible for us to comment upon the provision for the C&I waste as outlined in the Plan. However, from the perspective of LACW waste only NLWA supports the approach to meeting the needs for LACW as follows on the basis that at present there is judged to be substantial spare recycling capacity for handling both LACW and C&I waste, but that as recycling rates increase there will be a need to make provision for two hectares of land for recycling facilities in north London in 2026.

5.4 NLWA cannot comment on the anticipated need for construction and demolition waste recycling facilities in north London to 2032, but notes that there is an anticipated requirement for four hectares of land to be made available in 2016 and an additional two hectares in 2021 for new facilities to recycle this waste stream. As noted above, providing land for such facilities is both in accordance with strategic Plan objectives, and improves the ability of early developers to find suitable sites and therefore make progress towards local and regional waste management objectives.

6.0 Question 6.

Do you agree that the above described methodology used to identify potential sites and areas for future waste development is justified and proportionate? If not, why not? Please provide an alternative approach.

6.1 NLWA agrees with the principle of identifying both sites and areas for inclusion in the Plan and NLWA agrees with the described methodology used to identify potential sites and areas for future waste development and considers that it is both justified and proportionate.

6.2 NLWA would suggest that the draft Plan should note at paragraph 8.7 the possible loss of the composting plant at the Edmonton EcoPark site as part of the Authority's proposed Development Consent Order (DCO) application. This possible closure of this on-site operation is necessary in order to provide sufficient land on the site to enable a replacement energy recovery facility to be built whilst at the same time

allowing the existing facility to continue operation. It is also proposed to include a Resource Recovery Facility (RRF) including a new Reuse and Recycling Centre (RRC), a relocated transfer hall and a bulky waste/fuel preparation facility on the site as part of the DCO application. Accordingly NLWA recommends that the next draft of the Plan acknowledges these possible additions and removal of treatment capacity at the EcoPark.

6.3 In relation to paragraph 8.10 which refers to the potential redevelopment of the Brent Cross Cricklewood area and the construction of Crossrail 2 and their effect upon existing waste sites the main point to note is that we would urge caution about the ability of individual private sector operators or municipal waste authorities to find replacement sites for any that are lost to waste use. NLWA also urges caution against double counting of waste management capacity i.e. in both existing and proposed replacement operations.

6.4 There is no mention in the Plan about whether there is an opportunity to consolidate a number of small sites and for the replacement for these multiple small sites to be one more economically attractive larger site as noted in paragraph 3.6.1 above. The closure of small transfer stations which also act as recycling sorting depots for example may be much better replaced with a single larger processing site than a straight 'like for like' replacement of what was in place before. It would be helpful in our view if the Plan made some comment about this opportunity.

7.0 **Question 7.**

Do you know of any existing waste facilities which are not included in Schedule 1 in Appendix 1? If so, please provide details.

7.1 NLWA's general comment on the list of existing safeguarded waste sites in north London is that it would be very helpful if the full address and postcode of each site was listed to ensure that the correct site is properly identified.

7.2 A number of the existing waste facilities on the list are also closed or closing as follows:

- BAR11 Mill Hill Depot – this depot is closing because it is in the Mill Hill East area, which has been prioritised for housing and employment use. Planning permission has already been granted for redevelopment. It is proposed that the existing depot will be replaced by a new facility at Abbots Depot, for which a planning application has been submitted. See: <https://www.barnet.gov.uk/citizen-home/rubbish-waste-and-recycling/Proposed-Council-Depot--Abbots-Depot-site.html>
- ENF15 Environmental Tyre Disposals Ltd – this site/facility is closed, but not redeveloped.
- HAR5 Redcom Ltd, White Hart Lane, Tottenham – this site/facility is closed but not redeveloped.

7.3 We are also unclear if two of the sites/ facilities listed in fact refer to the same single site:

HAR4 O'Donovan, Markfield Road, Tottenham and
HAR8 O'Donovan, Markfield Road, Tottenham.

We recommend that this is checked and if necessary amended in the next version of the Plan.

- 7.4 NLWA also notes the point previously made above that Enfield council's existing Barrowell Green RRC is missing from Figure 7.
- 7.5 NLWA does not know of any other existing waste facilities which are not included in Schedule 1 in Appendix 1.

8.0 Question 8.

Do you agree with the draft policies for development on new sites and areas? If not, please provide reasons why and suggest an alternative.

- 8.1 NLWA agrees with Draft Policy 2 on Site Allocations which states that applications for waste management on sites identified in Schedule 2, including Pinkham Way, will be permitted provided the applicant can demonstrate that the proposal is in line with the relevant aims and policies of the NLWP, the London Plan, Local Plans and related guidance and the development results in the highest practicable level of recycling and recovery of materials in line with the principles of the waste hierarchy.
- 8.2 NLWA also agrees with Draft Policy 3 on Area Allocations which is similar to draft policy 2 except that the policy relates to areas rather than sites. This draft policy also notes that applications for waste management development within areas identified in Schedule 4 will be assessed by the London Legacy Development Corporation as they sit within the LLDC area of planning jurisdiction.

9.0 Question 9.

Do you have any comments on the accuracy of the details in the sites and areas proformas in Appendix 2? Do you have any additional sites or areas you wish to put forward for consideration?

- 9.1 NLWA notes that the draft Plan's site profiles indicate potential uses in accordance with a sustainability appraisal. However, NLWA has previously argued that the Plan should not favour one treatment technology over another because of the likelihood that such technologies will change during the life of the Plan, and the ability to mitigate any impacts will change too. Consequently NLWA recommends that sites should simply be designated as suitable for waste management use in general.
- 9.2 NLWA also has a few specific comments on the details of the sites and area profiles included in Appendix 2:
- 9.3 *Enfield sites and areas: A11-EN Montagu Industrial Area.* In 2010 LB Enfield granted planning permission to Kedco for a £45 million waste wood biomass gasification plant at Gibbs road in the Montagu Estate (listed as ENR27 in Appendix 1). However, the profile states that the Montagu Road area is unlikely to be suitable for thermal treatment and pyrolysis/gasification. From a planning perspective NLWA cannot understand how this profile description can be used given the previous planning permission that has been granted. NLWA recommends that the suitability of this area for thermal treatment and pyrolysis/gasification is reconsidered.
- 9.4 *Hackney sites and areas: A15-HC – Millfields LSIS.* The power facility here may make the site suitable for energy recovery. Subject to our point at 9.1 above, we therefore recommend that the classification of this site as being unsuitable for thermal treatment is reassessed and amended for the next version of the Plan.

9.5 *Haringey sites and areas: A22-HR – Friern Barnet Sewage Works.* The draft Plan lists this site as potentially suitable for indoor composting and in-vessel composting yet unlikely to be suitable for anaerobic digestion and mechanical biological treatment which are both enclosed. From a planning perspective NLWA cannot understand how it is that an indoor composting or an in-vessel composting facility is different from, for example, an MBT plant or anaerobic digestion facility. The Authority recommends that the suitability of this site is amended for the next version of the Plan, along with all other sites as at paragraph 9.1 above.

9.6 Tables 9, 10 and 11 within the body of the document would also need to be amended so that the suitability details of all sites and areas are consistent with the suitability details in Appendix 2.

10.0 Question 10.

Do you agree with the inclusion and provision of the policy on unallocated sites? If not, please provide an alternative approach.

10.1 NLWA agrees with the inclusion and provision of the policy on unallocated sites and the wording of the policy itself which states that applications for waste development on unallocated sites outside of the sites and areas identified in Schedules 1-3 will be permitted provided a number of criteria are met. These criteria include developments being in line with relevant aims of the NLWP, consistency with NLWP site assessment criteria and that the development results in the highest practicable level of recycling and recovery of materials in line with the principles of the waste hierarchy.

11.0 Question 11.

Do you agree with the locations identified as being in need for new Reuse and Recycling Centres?

11.1 NLWA agrees with the locations identified as being in need for new Reuse and Recycling Centres. However, the Authority's proposed Development Consent Order (DCO) application at the Edmonton EcoPark is also expected to include a Resource Recovery Facility (RRF) including a new Reuse and Recycling Centre (RRC), a relocated transfer hall and a bulky waste/fuel preparation facility as noted in paragraph 6.2 above. NLWA would suggest that the draft Plan should note at paragraph 8.7 the possible loss of the composting plant at the Edmonton EcoPark site as part of the Authority's proposed Development Consent Order (DCO) application and the proposed inclusion of a Resource Recovery Facility (RRF) including a new Reuse and Recycling Centre (RRC), a relocated transfer hall and a bulky waste/fuel preparation facility on the site as part of the DCO application. Accordingly NLWA recommends that the next draft of the Plan acknowledges these possible additions and removal of treatment capacity at the EcoPark and also acknowledges at either paragraph 9.23 or paragraph 9.24 that NLWA is also proposing a new RRC on the Edmonton EcoPark site as part of its proposed DCO application.

11.2 In addition to this the Authority is still of the view that additional RRCs are required. The Authority's policy on RRC provision which was agreed following a report to an Authority meeting in June 2010 <http://www.nlwa.gov.uk/governance-and-accountability/authority-meetings/2010/reports-from-meeting-of-30-06-2010> is that if

the Authority becomes the provider of RRC services in north London (which it now is for seven of the nine RRCs, with the eighth due to transfer to NLWA management in October 2015) then

“The Authority aims for 95% of residents to live within two miles (measured as a straight line) of a Household Waste Recycling Centre (or Reuse and Recycling Centre as referred to by the London Mayor).”

11.3 This policy supplements the North London Joint Waste Strategy implementation action 4.G.1 and in order to be compliant it requires additional RRCs to be built. Comparisons with other waste disposal authorities also indicate that north London needs more RRCs as local provision is poor compared to other areas.

12.0 **Question 12.**

Do you agree with [the] assessment criteria for waste management facilities and related development? If not, please suggest alternatives.

NLWA has a number of comments on Policy 6 which relates to the assessment criteria for waste management facilities and related development:

12.1 As noted already in paragraph 3.5.1 the Authority considers that it would be appropriate to exempt RRCs from Policy 6a which requires all facilities to be enclosed and additionally to remove the last sentence of paragraph 4.15 which also refers.

12.2 As noted already in paragraph 2.3 Policy 6e refers to the requirement for all waste developments to incorporate a high quality of design. In NLWA's view this policy should be changed to 'appropriately high standards' or 'appropriately high quality of design' to reflect the fact that the standard of design for a small waste transfer station may be very different to the standard of design that is appropriate for a major new municipal facility.

12.2.1 Design will also be affected by responses to local consultation on proposals so we consider that it is not appropriate for the NLWP to set an absolute objective relating to high standards and quality of design.

12.3 Policy 6h) refers to a requirement for there to be no significant adverse transport effects outside or inside a site as a result of the development. The Authority queries whether this test can be passed for a currently disused site or completely new site. NLWA recommends that this criterion is amended to: 'There are no significant *disproportionately* adverse transport effects outside or inside the site as a result of the development. This change would allow the benefits of for example recycling more waste to be taken into account and offset against the negative impact of additional transport movements resulting from the development of a new site, and to reflect the relative size of the new facility.

12.4 In relation to policy 6i) NLWA does not accept the obligation here to make "the fullest possible contribution to climate change adaptation and mitigation", and especially not "including contributions to the development of decentralised energy networks." This is an unrealistic expectation that is being proposed for waste developments, and would appear to be inappropriately imposing upon commercial negotiations. Accordingly the Authority would like to see this policy removed.

12.5 In addition to the above, we note that at paragraph 9.34 reference is made to a requirement for waste developments to be designed to 'protect and enhance' local biodiversity, whereas the main policy is for 'no significant adverse effect' with no mention of enhancement. Although the majority of this paragraph refers to protected areas, the absolute requirement outlined in the first sentence for all developments to both protect and enhance local biodiversity is unworkable. A development on a new site could easily have some form of negative impact on biodiversity. We consider the wording in paragraph 9.34 to be inappropriate for the sites and areas identified as suitable for waste use in the Plan because of the industrial nature of such activity, and unlikely to be workable in all cases.

13.0 Question 13.

Do you agree with the proposed approach to Energy Recovery and Decentralised Energy? If not, please suggest an alternative.

- 13.1 It is reasonable for a planning policy to require a developer of a waste-fuelled energy recovery facility to be enabled to provide heat, but the policy should not place an absolute requirement on such a developer because this must be the subject of commercial negotiations between interested parties.
- 13.2 The policy requirement for at least electricity production in the event that there is no heat demand within range of a development should be tempered by the achievability of installing a grid connection at a development site if none is available already.
- 13.3 The term 'heat network' may not be applicable to a single industrial or other large-scale user of heat, so we suggest the terminology is broadened out to accommodate this.
- 13.4 Regarding Policy 7, which refers to energy recovery and decentralised energy, at paragraph 1 there is a requirement to "minimise carbon emissions" and "maximise the use of lower-carbon energy sources". Whilst this aim is a laudable outcome for the Plan, from a waste disposal authority's perspective sitting at the end of the pipe in the production and consumption process it is important that the implementation of any policy is deliverable. NLWA would recommend that the aims of Policy 7 should be set within the context of lifecycle assessment and rational, practical outcomes. NLWA recommends that the wording of this policy is reconsidered to acknowledge lifecycle thinking and the practical implementation of this policy's objectives.
- 13.5 Policy 7, paragraph 3 would also read better if it came at the end of the Policy and for it to be made clear that it applies to all the other requirements.
- 13.6 Policy 7 paragraph 5. The safeguarding of land and routes for DEN pipes must be qualified by technical and economic feasibility too, because it sterilises land that could be used for active waste management. The Authority therefore seeks a change in the wording to reflect this reality in the next version of the Plan.
- 13.7 Paragraph 9.41 refers back to Policy 6. NLWA considers that there may be an erroneous reference here and that this paragraph should in fact refer to Policy 7. The wording of this paragraph may also require review as part of the review of this policy noted in paragraph 13.4 above.

13.8 At paragraph 9.44 the wording is incorrect as it says that "LVHN will initially use heat and steam from ... the EcoPark". LVHN is only requesting hot water to be supplied from the energy-from-waste facility at Edmonton.

14.0 Question 14.

Do you agree with the proposals for monitoring the NLWP and the roles and responsibilities of the bodies involved in implementing it? If not, please state why and suggest an alternative.

14.1 We broadly agree with the proposals for monitoring the NLWP and the roles and responsibilities of the bodies involved in implementing it. However, we have some detailed comments on the targets and responsibilities.

14.2 NLWA acknowledges that there is a target of aspiring to achieve 60% recycling and composting of LACW by 2031 in the London Plan in line with the Mayor of London's municipal waste management strategy, 'London's wasted resource' which includes a target of 60 per cent recycling and composting of municipal waste by 2031. However, the draft NLWP monitoring indicator refers to achieving 60% recycling and composting by 2026. This target is not included in NLWA's or the seven boroughs' waste strategies. So whilst we have agreed with a 50% recycling target by 2020, the proposed 2026 or 2031 target seems to us to be too high without any pull mechanism to achieve this high rate. The current poor state of recycling markets, tonnage based recycling targets and lack of drivers to pull demand through the system add to this, and in preparing our 'needs assessment' for the North London Heat and Power Project referenced in paragraph 4.1 it was concluded that NLWA has no mandate to go beyond 50% re-use, recycling and composting. This means that we do not think it is sensible to monitor against this indicator. The target in the draft Plan also makes no mention of reuse which is typically included with the recycling data provided to meet recycling targets.

14.3 In table 13 borough waste collection authorities are listed as having responsibilities to support and promote waste reduction initiatives, but NLWA does not. We recommend that NLWA is also listed as having responsibilities to support and promote waste reduction initiatives as we work in partnership with the north London boroughs to deliver on a range of waste prevention objectives. In addition, the Waste Minimisation Act in particular and Waste Framework Directive, which enshrine the waste hierarchy and the top end of it in particular in waste management policy, drive us towards supporting and promoting waste prevention.

14.4 In table 13 reference is made to the waste industry having responsibilities to propose new waste sites in sustainable areas. It is unclear what this means.

14.5 At paragraph 10.9 reference is made to **all** new infrastructure being funded by private commercial funding. In NLWA's view there may be other sources of funding available too such as public sector borrowing. Accordingly NLWA recommends that the wording of paragraph 10.9 is amended to reflect a wider range of possible funding opportunities for new facilities being available to developers. However, it is correct to say that specific sources of funding cannot be identified for specific sites or areas at this time.

RESPONSE ENDS

