

EiP Secretariat
Committee Room 1
City Hall
The Queen's Walk
London, SE1 2AA
Eip.secretary@london.gov.uk

Dear Sir or Madam

**Ref: The Draft Replacement London Plan – Examination in Public
Written Statement with respect to Matter 5E – Waste Issues**

The North London Waste Authority is the statutory joint waste disposal authority for North London with responsibility for managing the disposal of municipal waste from the London boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest.

Attached to this letter are 8 copies, in the required format, of the Authority's written statement in response to the Examination in Public of the draft Replacement London Plan with respect to Matter 5E – Waste Issues. A separate letter and response is being submitted in relation to Matter 5F.

Please note that this response also incorporates comments from the seven constituent boroughs in their separate capacities as waste planning authorities, working together to produce the North London Waste Plan, the joint waste Development Plan Document (DPD) for North London.

Yours faithfully



AL
Andrew Lappage
Head of Waste Strategy and Contracts

Encs.

Matter 5E – Waste issues

Policy 5.16 Waste self-sufficiency

- e) Is the target date for zero waste to landfill sufficiently demanding; alternatively, is an expectation of achieving a zero target for use of landfill overall realistic and are the target percentages for recycling different waste streams realistic?**

1.0 The zero waste to landfill target is a key part of the strategy of the Plan. It also defines the trajectory of the apportionment targets for boroughs. However, it is ill-defined in the document. We also find it difficult to envisage a future in which landfill does not have a place as there will always be residues after all other processes have taken place. We therefore consider that the target should be renamed 'zero waste direct to landfill' or alternatively 'zero untreated waste to landfill', although we recognise that there is already a requirement for waste to be pre-treated before being sent to landfill as outlined in the Landfill Regulations 2007. If the term 'zero waste direct to landfill' is used this means that nothing should be landfilled that has not been through some other process first. We support the inclusion of a landfill diversion target, but with a clearer definition of the term and as an aspirational target giving direction to the Plan.

1.1 The target recycling percentages for municipal solid waste outlined in the Plan are in line with current North London procurement targets until 2020, but thereafter exceed North London's modelling, which only ever takes us just over 50% and already relies on all known available policy measures to maximise recycling. Additionally, given recently proposed broadening of the definition of 'municipal solid waste', this makes the targets potentially more difficult to achieve, considering the existing unknown recycling rate of the additional commercial and industrial waste that will now enter the 'municipal' stream as a result of the definition change. The information about commercial and industrial waste arisings also appears to be less reliable than the information for municipal solid waste which means that target-setting is potentially more difficult. We would suggest that the target calculations are reviewed as a result.

1.2 Finally, it is unclear if the London Plan targets for recycling and composting included 'reuse'. Reuse is currently included in the national indicator figure for 'household waste recycled, composted or reused'. This needs to be clarified.

- f) Is the proposed timetable for achieving self-sufficiency suitably demanding?**

2.0 The self-sufficiency target is insufficiently detailed at present and there needs to be more work carried out to determine how the target is to be realised and achieved. As this will take time, we would not wish to see any target dates drawn closer. In particular whilst we consider that achieving self-

sufficiency targets for municipal solid waste in London are potentially deliverable, given the changing definition of municipal solid waste and uncertainty regarding commercial and industrial waste arisings the Authority considers that the currently proposed timetable should remain.

h) Is the definition of managed waste in terms of solid recoverable fuel robust and achievable?

3.0 Whilst we welcome the recognition that SRF production in the capital can be counted as waste 'managed in London', we do not consider the definition of 'managed waste' in terms of SRF to be robust or achievable. In a supplementary letter to the Mayor of London (8th January 2010) the North London Waste Authority expressed concerns that only the production of SRF that is defined as 'biomass fuel' as outlined in the Renewables Obligation Order (ROO) will be considered to be 'managed in London' if it is produced in the capital. The Authority argues that whilst theoretically achievable, a 90% biomass content SRF will be costly to produce, expensive to test to prove compliance, and contains a higher biomass content than that required by Ofgem (who deem SRF as just 50% biomass content). We also argue, as the North London Waste Authority is seeking to produce SRF with a minimum biomass content of 50% (which coupled with good quality CHP should achieve Renewable Obligation Certificates), that a 50% biomass SRF produced in London should be deemed to be 'managed in London' and that with this change the production of SRF would make a positive contribution towards the achievement of self-sufficiency targets.

3.1 Finally, if the London Plan continues to consider only 90% biomass content SRF production as 'waste managed in London', we understand that this material would no longer be considered to be SRF but 'biomass' or 'fuel' and therefore it would need to be considered how it would be accounted for within the self-sufficiency calculations.

Policy 5.17 Waste capacity

i) Is the proposed apportionment in the December 2009 Minor Alteration of the Plan fair and reasonable?

4.0 We support retaining the method of apportionment from the previous version of the London Plan. The apportionment methodology and approach was the subject of considerable consultation with boroughs at the time and was tested at an EIP. What has changed in this version of the plan is the revised waste projections. As far as Municipal Solid Waste is concerned we believe the projections are more solidly based on the most recent data. The new GLA waste projections are within the range of sensitivities of the projections undertaken by the North London Waste Authority as part of the organisation's long term procurement. As a result we can broadly support the projections as long as there is careful monitoring by the GLA and by boroughs of trends in waste arisings and of new surveys such as that on commercial

and industrial waste. Boroughs are required in their LDFs to provide for some flexibility and this should take care of variations.

k) Is greater clarity required on the amount and type of waste likely to be exported from the GLA area, to facilitate waste planning by receiving Authorities outside London?

5.0 It is reasonable that there should be some planning of flows of waste in and out of London and the London Plan ought to reflect practical needs and opportunities in relation to surrounding counties on capacity and availability of landfill.

l) In paragraph 5.80 is it appropriate for strategy to promote large centralized sites rather than small localized sites for handling waste?

6.0 Paragraph 5.80 recognises the need to balance the benefits of smaller, local sites against the overall demand for land for waste and the benefits of co-locating a range of facilities together on a smaller number of larger sites. As currently worded we do not consider that this section overly promotes large centralised sites, but recognises the pros and cons of different approaches. Accordingly we suggest that the wording is supplemented with a reference to the 1997 report commissioned by DEFRA into the optimum economies of scale for different types of waste treatment, particularly if compensatory provision for small transfer stations is to be consolidated into larger centralised sites that can then provide viable facilities that contribute to the Plan's self-sufficiency targets.

<http://www.defra.gov.uk/environment/waste/localauth/partnerwork/documents/economies-scale.pdf>

n) Should landfill provision be included, in line with PPS10?

7.0 Since landfill will remain an important outlet for London's waste even after zero waste direct to landfill is achieved, it is reasonable that this provision should be planned for.

o) Should a planning decisions section be added? In particular, is it sufficiently clear how the requisite number and type of treatment facilities will be provided to handle the waste apportionments in order to be consistent with the advice of PPS10?

8.0 The dropping of table 4A.7 from the adopted London Plan created a problem for local authorities in the middle of drawing up their waste DPDs since it sets out a mix of facilities for London and, given that, an average footprint for new facilities at about 40,000 tonnes per hectare. Boroughs have therefore had to engage in further work and we have decided that there is evidence to support an average of 50,000 tonnes per hectare for new facilities. We would welcome the GLA's views on what they consider to be a suitable average footprint.