

# Proposed Submission Representation Form

Consultation period:  
11<sup>th</sup> May 2011 – 22<sup>nd</sup> June 2011

For further information:

- Visit our website [www.nlwp.net](http://www.nlwp.net)
- Email [feedback@nlwp.net](mailto:feedback@nlwp.net)
- Phone Archie Onslow on 020 7974 5916

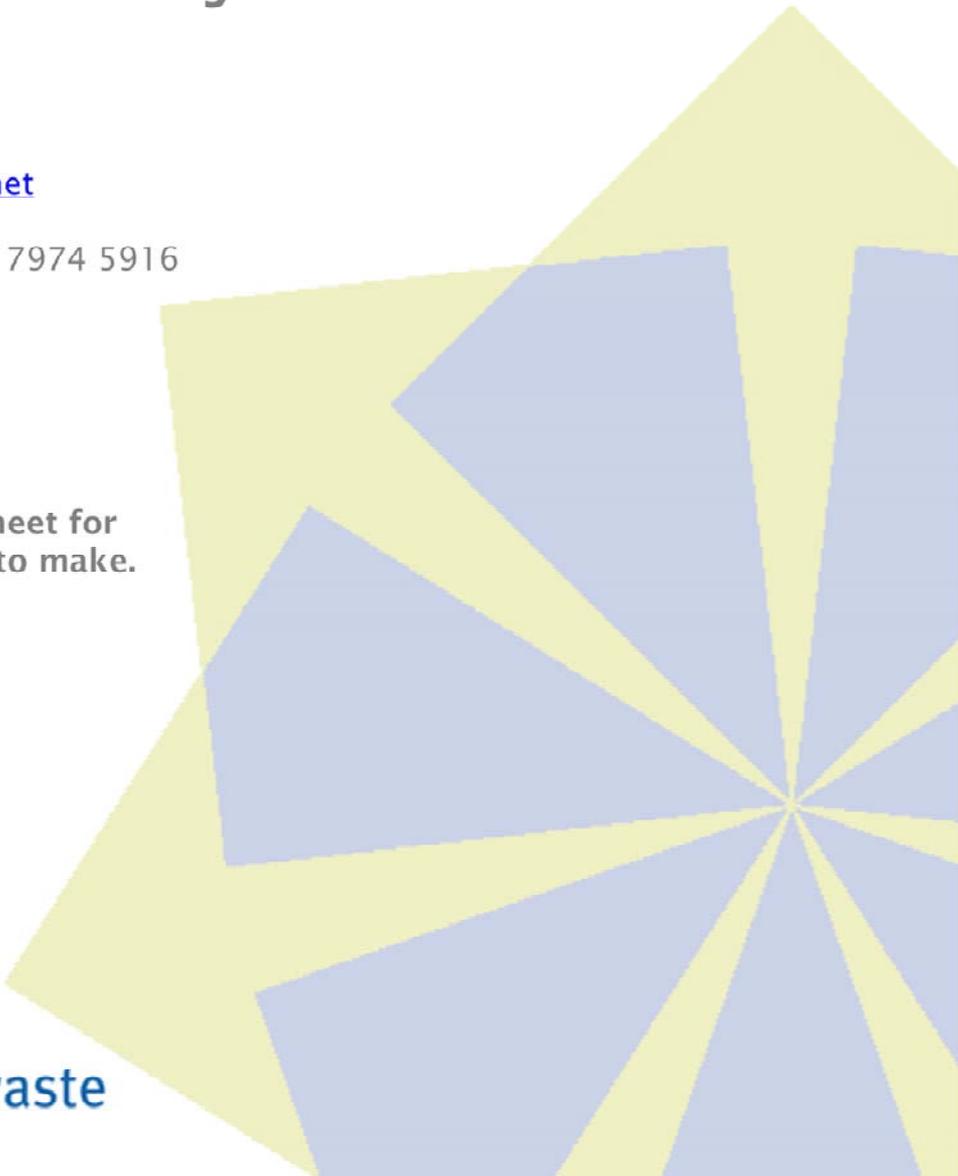
This form has 2 parts:

**Part A** – Personal details

**Part B** – Your representation(s).

**Please use a separate Part B sheet for each representation you wish to make.**

**Planning solutions**  
for North London's waste



Reference number  
(For internal use only)

Please refer to the Representation Form Guidance Note before completing this form. An electronic version of this form and the guidance note are available from [www.nlwp.net](http://www.nlwp.net)

### Section A – Personal Information

If you are providing more than one representation you only need to fill in this section once.

	Personal details	Agent's details (if applicable)
Title:	<b>Mr</b>	
First name:	<b>Andrew</b>	
Surname:	<b>Lappage</b>	
Job title (if relevant):	<b>Head of Waste Strategy &amp; Contracts</b>	
Organisation (if relevant):	<b>North London Waste Authority</b>	
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## Section B – Representation information – NLWA1

If you wish to provide more than one representation, please complete an individual copy of Section B for each representation. You only need to fill in Section A once.

### 1. To which part of the document does your representation relate?

Policy  (please state which policy)

Paragraph

(please state which paragraph)

Table  (please state which table)

Appendices  (please state which appendix)

### 2. Do you consider the document to be:

Sound Yes  But risk that it may not be. No

Legally compliant Yes  No

### 3. If you consider the document to be **unsound** please indicate which test of soundness it does not meet:

Justified

Effective

Consistent with national policy

### 4. Please explain why you consider the document is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.

If needed please continue on a separate sheet of paper.

The modelling work for the NLWP is based upon an assumption that if the North London Waste Authority processes 600,000 tonnes per annum of municipal solid waste into a solid recovered fuel (SRF) in the future that this would count towards the self sufficiency targets within the London Plan and contribute towards the achievement of the apportionment targets set for the sub-region.

However, the London Plan EiP Inspector's report has not determined what type of SRF production in the capital will be deemed to be waste 'managed' in London and has reported that the definition of SRF is a matter for the municipal waste management strategy for the capital, which is not yet published.

Previous drafts of the London Plan had indicated that only the production of a 90% biomass energy content SRF would count as waste 'managed' in London. The Authority and others made representations as part of the London Plan consultation process and to the EiP stating that a more realistic specification for SRF biomass energy would be 50% and that the production of 90% biomass energy SRF would be too difficult and costly to produce.

Although we understand that this may not be a matter of 'soundness' at this level, until the London Plan and the Municipal Waste Management Strategy are published it is uncertain whether the tonnage modelling assumptions and associated land take used for the NLWP for SRF production will contribute towards the achievement of self sufficiency to the extent currently foreseen, and accordingly whether this raises any issues of sufficient land being made available within the Plan to meet the apportionment targets set.

We understand that the new London Plan will be published later in July and the Municipal Waste Management Strategy for London will be published in the autumn and that accordingly this uncertainty will be removed, albeit that the potential issue may not if the biomass requirement remains unchanged.

5. Please set out what change(s) you consider necessary to make the document legally compliant or sound, having regard to the option you have identified in question 4 where this relates to soundness. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If a change is necessary, none can be proposed until it is known what definition of SRF is going to be used within the municipal waste management strategy for London and by implication, the London Plan.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination**

6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Yes, we wish to participate at the oral examination

7. If you consider it necessary to participate at the oral part of the examination, please outline why you consider this to be necessary:

The North London Waste Authority is the statutory body with responsibility for managing north London's municipal solid waste for the area covered by the North London Waste Plan and accordingly we anticipate that our contribution will be required.

If the London Mayor has published his municipal waste management strategy by then (as expected), the Authority's position will be clearer.

*Please note the Inspector will determine the most appropriate procedure to adopt for hearing those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Date:

8<sup>th</sup> July 2011

## Section B – Representation information – NLWA2

If you wish to provide more than one representation, please complete an individual copy of Section B for each representation. You only need to fill in Section A once.

1. To which part of the document does your representation relate?

- Policy  (please state which policy)
- Paragraph  (please state which paragraph)
- Table  6.3 (please state which table)
- Appendices  (please state which appendix)

2. Do you consider the document to be:

- Sound Yes  Subject to the changes indicated No
- Legally compliant Yes  No

3. If you consider the document to be **unsound** please indicate which test of soundness it does not meet:

- Justified
- Effective
- Consistent with national policy

4. Please explain why you consider the document is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.

If needed please continue on a separate sheet of paper.

The 'Environment' section of this table states that '... there must be no adverse effect on the nature conservation value of the site'. However, the Authority considers that the development of any waste facility on an undeveloped site will have some form of an impact on the biodiversity of the site and therefore the 'nature conservation value' even if that impact is mitigated or habitats are reinstated following construction.

It is secondly suggested that as the site description tables such as Table 6.3 are generally descriptive (rather than setting out policy regarding particular sites), that it would be preferable to relocate elsewhere in the text the references firstly to the requirement for no adverse effect on the nature conservation value of the site and secondly to the statement that any development should enhance biodiversity in the wider area.

5. Please set out what change(s) you consider necessary to make the document legally compliant or sound, having regard to the option you have identified in question 4 where this relates to soundness. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is suggested that the Environment section of Table 6.3 is reworded as follows: "The site has been identified as a SINC (site of importance to nature conservation) and ~~whilst the site has been~~ **additionally** identified for employment generating uses. ~~there must be no adverse effect on the nature conservation value of the site.~~ The site is also surrounded by **adjacent to** areas of importance to nature conservation and ~~any development must not adversely impact these areas and should incorporate features that enhance biodiversity in the wider area.~~

It is recommended that the text which has been deleted is moved elsewhere in the text recognising the points made above about impact of waste facilities, noting that the restriction should be to prevent significant impacts, not all impacts of any description.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination**

6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Yes, we wish to participate at the oral examination

7. If you consider it necessary to participate at the oral part of the examination, please outline why you consider this to be necessary:

The North London Waste Authority is the statutory body with responsibility for managing north London's municipal solid waste for the area covered by the North London Waste Plan and accordingly we anticipate that our contribution will be required.

*Please note the Inspector will determine the most appropriate procedure to adopt for hearing those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Date:

8<sup>th</sup> July 2011

## Section B – Representation information – NLWA3

If you wish to provide more than one representation, please complete an individual copy of Section B for each representation. You only need to fill in Section A once.

1. To which part of the document does your representation relate?

- Policy  (please state which policy)
- Paragraph  (please state which paragraph)
- Table  (please state which table)
- Appendices  (please state which appendix)

2. Do you consider the document to be:

- Sound Yes  Subject to the changes indicated No
- Legally compliant Yes  No

3. If you consider the document to be **unsound** please indicate which test of soundness it does not meet:

- Justified
- Effective
- Consistent with national policy

4. Please explain why you consider the document is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.

If needed please continue on a separate sheet of paper.

### Policy NLWP 2 – Location of waste development

Policy NLWP 2 states that proposals for waste facilities on non-allocated sites need to satisfy a number of points to the council's satisfaction such that there is "no adverse effect" on a number of criteria. However, there may be instances where it is suitable to bring forward a waste facility where it can be demonstrated that the benefits of the proposed development outweigh these impacts and the impacts are appropriately mitigated for. As such the policy should be amended to read 'no significant adverse impact', otherwise the policy may be too restrictive for waste development to happen.

We recommend that Policy NLWP 2 h is separated into two parts so that the distinction between Metropolitan Open Land and Green Belt which both have significant restrictions on developments associated with them are separated from land which has a local environmental designation. Whilst it would not be appropriate to seek to site new HWRCs or other waste facilities on metropolitan open land or green belt, it may be considered appropriate to propose a new HWRC or reuse centre (which themselves will provide a public amenity) in an area with a local environmental designation, provided appropriate mitigation could be provided.

Policy NLWP 2 i may apply to future HWRC sites not currently identified, and which (as noted above) themselves will provide a public amenity, notwithstanding that there may be impacts such as traffic occasionally queuing outside the facility at exceptional times that may be deemed to have an adverse impact on local amenity. Whilst impacts such as these can be minimised through good design and management, it is not possible to guarantee that all such impacts can be eliminated. We propose that HWRCs should be explicitly excluded.

5. Please set out what change(s) you consider necessary to make the document legally compliant or sound, having regard to the option you have identified in question 4 where this relates to soundness. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Authority suggests that the wording in Policy 2 is amended as follows (inserted text in bold red font):

- e. *The site is not within and has no **significant** adverse impact on internationally or nationally designated nature conservation areas;*
- f. *The site is not within and has no **significant** adverse impact on internationally or nationally designated historic buildings;*
- h. *The site is not within metropolitan open land **or** green belt ~~or~~*  
***h-new The site has no significant adverse impact on land with a local environmental designation;***  
*and*
- i. *the site has no adverse impact on local amenity\**

\* Except for Household Waste & Recycling Centres.”

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination**

6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Yes, we wish to participate at the oral examination

7. If you consider it necessary to participate at the oral part of the examination, please outline why you consider this to be necessary:

The North London Waste Authority is the statutory body with responsibility for managing north London's municipal solid waste for the area covered by the North London Waste Plan and accordingly we anticipate that our contribution will be required. We have a particular interest in the development of new HWRCs with a statutory duty to provide this public amenity service to north London residents.

*Please note the Inspector will determine the most appropriate procedure to adopt for hearing those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Date:

8<sup>th</sup> July 2011

## Section B – Representation information – NLWA4

If you wish to provide more than one representation, please complete an individual copy of Section B for each representation. You only need to fill in Section A once.

1. To which part of the document does your representation relate?

- Policy  (please state which policy)
- Paragraph  (please state which paragraph)
- Table  (please state which table)
- Appendices  (please state which appendix)

2. Do you consider the document to be:

- Sound Yes  Subject to the changes indicated No
- Legally compliant Yes  No

3. If you consider the document to be **unsound** please indicate which test of soundness it does not meet:

- Justified
- Effective
- Consistent with national policy

4. Please explain why you consider the document is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.

If needed please continue on a separate sheet of paper.

### Policy NLWP 4 Protecting Amenity

The Authority considers that it would be appropriate to exempt Household Waste Recycling Centres (HWRCs), which are referenced in Policy NLWP 3, from Policy NLWP 4 a.

HWRCs, formerly known as 'Civic Amenity' sites, are in themselves a convenient local amenity to which residents can take their refuse and recycling. Their development, including possibly for the receipt of business waste, is supported in the recently published national 'Government Review of Waste Policy'. However it is possible that such sites may result in impacts on local amenity

For example, at exceptional times there may occasionally be traffic queuing outside the facility, and this may be deemed to have an adverse impact on local amenity. Whilst impacts such as these can be minimised through good design and management, it is not possible to guarantee that all such impacts can be totally eliminated such that it can be demonstrated that the amenity of local residents will be 'protected' at all times, depending upon local residents' view of 'protected' and 'amenity'.

Policy NLWP 4 i refers to a development having no significant adverse effects on *local biodiversity* and no likely significant impacts or adverse effects affecting the integrity of *any area designated under the Habitats Directive*. The Authority would suggest that this part of Policy NLWP 4 should be separated into two distinct elements because local designation and Habitats Directive designation of sites are very different and accordingly the approach to protection will differ.

Policy NLWP 4 j states that all waste development proposals should have 'no significant impact on the quality of underlying soils'. This appears to exclude the positive impacts of decontamination and remediation that some developments may bring, which is not what we believe to be intended.

5. Please set out what change(s) you consider necessary to make the document legally compliant or sound, having regard to the option you have identified in question 4 where this relates to soundness. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Authority suggests that:

Policy NLWP4a has a footnote added as we have suggested for Policy NLWP 2i.

and that policy 4i is separated into two parts as indicated above.

- i. the development has no significant adverse effects on local biodiversity;
- i-new there are no likely significant impacts or adverse effects affecting the integrity of an area designated under the Habitats Directive;

and that the wording in NLWP 4j is amended as follows:

- j. there will be no significant **detrimental** impact on the quality of underlying soils, surface or groundwater"

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination**

6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Yes, we wish to participate at the oral examination

7. If you consider it necessary to participate at the oral part of the examination, please outline why you consider this to be necessary:

The North London Waste Authority is the statutory body with responsibility for managing north London's municipal solid waste for the area covered by the North London Waste Plan and accordingly we anticipate that our contribution will be required.

The North London Waste Authority seeks to participate in the oral examination in order to provide some commentary regarding the practical implementation of policies contained within the Plan.

*Please note the Inspector will determine the most appropriate procedure to adopt for hearing those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Date:

8<sup>th</sup> July 2011

## Section B – Representation information – NLWA5

If you wish to provide more than one representation, please complete an individual copy of Section B for each representation. You only need to fill in Section A once.

1. To which part of the document does your representation relate?

- Policy  (please state which policy)
- Paragraph  7.14 (please state which paragraph)
- Table  (please state which table)
- Appendices  (please state which appendix)

2. Do you consider the document to be:

- Sound Yes  subject to the changes indicated No
- Legally compliant Yes  No

3. If you consider the document to be **unsound** please indicate which test of soundness it does not meet:

- Justified
- Effective
- Consistent with national policy

4. Please explain why you consider the document is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.

If needed please continue on a separate sheet of paper.

Paragraph 7.14 states that 'developments should enhance the quality of life where possible'. The Authority is unclear how waste facilities might enhance the quality of life.

5. Please set out what change(s) you consider necessary to make the document legally compliant or sound, having regard to the option you have identified in question 4 where this relates to soundness. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Authority suggests that the following wording in paragraph 7.14 is deleted:  
"~~Developments should enhance the quality of life where possible.~~"

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination**

6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Yes, we wish to participate at the oral examination

7. If you consider it necessary to participate at the oral part of the examination, please outline why you consider this to be necessary:

The North London Waste Authority seeks to participate in the oral examination in order to provide some commentary regarding the practical implementation of policies contained within the Plan.

*Please note the Inspector will determine the most appropriate procedure to adopt for hearing those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Date:

8<sup>th</sup> July 2011

## Section B – Representation information – NLWA6

If you wish to provide more than one representation, please complete an individual copy of Section B for each representation. You only need to fill in Section A once.

1. To which part of the document does your representation relate?

- Policy  (please state which policy)
- Paragraph  7.17 (please state which paragraph)
- Table  (please state which table)
- Appendices  (please state which appendix)

2. Do you consider the document to be:

- Sound Yes  subject to the changes indicated No
- Legally compliant Yes  No

3. If you consider the document to be **unsound** please indicate which test of soundness it does not meet:

- Justified
- Effective
- Consistent with national policy

4. Please explain why you consider the document is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.

If needed please continue on a separate sheet of paper.

Paragraph 7.17 states that the north London boroughs 'seek innovative approaches, where appropriate, to deliver high quality designs'. The Authority does not consider that 'innovative approaches' are necessarily needed to deliver high quality design and as currently worded we consider that the two are forced to go together.

Paragraph 7.17 also states that the north London boroughs seek to deliver high quality designs and 'safe and inclusive environments'. The interpretation of 'inclusive' could be that facilities are open to all. This is unrealistic at waste treatment facilities for health and safety reasons.

Paragraph 7.1.7 additionally notes that the design and access statement should set out how siting and appearance complements the existing topography and vegetation. This could be interpreted as the existing topography and vegetation of the site, which will be changed as a result of the waste development. The Authority therefore suggests that this text is expanded to confirm what is being referred to here.

5. Please set out what change(s) you consider necessary to make the document legally compliant or sound, having regard to the option you have identified in question 4 where this relates to soundness. You will need to say why this change will make the document legally compliant or sound. It will be

helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Authority suggests that the wording of Paragraph 7.17 is amended as follows (inserted text in bold red font and deleted text has a strike through):

“Good design is fundamental to the development of high quality waste infrastructure and the north London boroughs seek ~~innovative approaches, where appropriate,~~ to deliver high quality designs and safe and inclusive environments. **Innovative approaches are supported if appropriate in this regard.** The design and access statement should set out how the development takes on board good practice such as the Defra/CABE guidance “Designing waste facilities – a guide to modern design in waste”<sup>2</sup>. The design and access statement should set out how the siting and appearance complements the existing **surrounding** topography and ~~vegetation~~ **landscape**. Materials and colouring need to be appropriate to the location.”

***Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination***

6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Yes, we wish to participate at the oral examination

7. If you consider it necessary to participate at the oral part of the examination, please outline why you consider this to be necessary:

The North London Waste Authority seeks to participate in the oral examination in order to provide some commentary regarding the practical implementation of policies contained within the Plan.

*Please note the Inspector will determine the most appropriate procedure to adopt for hearing those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Date:

8<sup>th</sup> July 2011

## Section B – Representation information – NLWA7

If you wish to provide more than one representation, please complete an individual copy of Section B for each representation. You only need to fill in Section A once.

1. To which part of the document does your representation relate?

- Policy  (please state which policy)
- Paragraph  7.20 (please state which paragraph)
- Table  (please state which table)
- Appendices  (please state which appendix)

2. Do you consider the document to be:

- Sound Yes  subject to the changes indicated No
- Legally compliant Yes  No

3. If you consider the document to be **unsound** please indicate which test of soundness it does not meet:

- Justified
- Effective
- Consistent with national policy

4. Please explain why you consider the document is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.

If needed please continue on a separate sheet of paper.

Paragraph 7.20 which discusses the Transport Assessment refers to the following in the first sentence: "... no unacceptable safety or health hazards for other road users, cyclists, pedestrians or residents ...." The Authority suggests that the reference to 'residents' singles out a particular group for protection, and by inference may exclude other groups such as businesses or others. The Authority considers that it may be more consistent if this sentence simply just refers to cyclists and pedestrians only as examples of other road users.

There may also be some difference in interpretation of the use of the word 'hazard' in the above sentence. The reference is clearly to hazards from moving traffic associated with a waste development, but the sentence could be interpreted as referring to possible hazards from other aspects of a facility.

5. Please set out what change(s) you consider necessary to make the document legally compliant or sound, having regard to the option you have identified in question 4 where this relates to soundness. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Authority suggests that the wording in paragraph 7.20 is amended as follows (inserted text in bold red font and deleted text has a strike through):

“... no unacceptable safety **risks from the traffic associated with the proposal** ~~or health hazards~~ for other road users, **including** cyclists **and** pedestrians ~~or residents~~ would be generated.”

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination**

6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Yes, we wish to participate at the oral examination

7. If you consider it necessary to participate at the oral part of the examination, please outline why you consider this to be necessary:

The North London Waste Authority seeks to participate in the oral examination in order to provide some commentary regarding the practical implementation of policies contained within the Plan.

*Please note the Inspector will determine the most appropriate procedure to adopt for hearing those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Date:

8<sup>th</sup> July 2011

## Section B – Representation information – NLWA8

If you wish to provide more than one representation, please complete an individual copy of Section B for each representation. You only need to fill in Section A once.

1. To which part of the document does your representation relate?

- Policy  (please state which policy)
- Paragraph  (please state which paragraph)
- Table  (please state which table)
- Appendices  (please state which appendix)

2. Do you consider the document to be:

- Sound Yes  subject to the changes indicated No
- Legally compliant Yes  No

3. If you consider the document to be **unsound** please indicate which test of soundness it does not meet:

- Justified
- Effective
- Consistent with national policy

4. Please explain why you consider the document is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.

If needed please continue on a separate sheet of paper.

Paragraph 7.22 which discusses biodiversity refers in the sixth sentence to there being “six Sites of Special Scientific Interest and 20 Local Nature Reserves as well as sites of importance to nature conservation (SINC).” The designation and associated implications for developments associated with SSSIs are very different to those associated with areas designated locally for biodiversity. The Authority considers that referring to SSSIs in the same sentence as SINCs and Local Nature Reserves does not make the distinction sufficiently apparent.

5. Please set out what change(s) you consider necessary to make the document legally compliant or sound, having regard to the option you have identified in question 4 where this relates to soundness. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Authority suggests that the sixth sentence of paragraph 7.22 is split out in the following order (inserted text in bold red font and deleted text has a strike through):

“In addition there are six Sites of Special Scientific Interest (SSSI), **and There are additionally** 20 local Nature Reserves as well as **Sites of Importance to Nature Conservation** (SINC).”

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination**

6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Yes, we wish to participate at the oral examination

7. If you consider it necessary to participate at the oral part of the examination, please outline why you consider this to be necessary:

The North London Waste Authority seeks to participate in the oral examination in order to provide some commentary regarding the practical implementation of policies contained within the Plan.

*Please note the Inspector will determine the most appropriate procedure to adopt for hearing those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Date:

8<sup>th</sup> July 2011

## Section B – Representation information – NLWA9

If you wish to provide more than one representation, please complete an individual copy of Section B for each representation. You only need to fill in Section A once.

1. To which part of the document does your representation relate?

### Whole document

- Policy  (please state which policy)
- Paragraph  (please state which paragraph)
- Table  (please state which table)
- Appendices  (please state which appendix)

2. Do you consider the document to be:

- Sound Yes  Subject to the changes indicated No
- Legally compliant Yes  No

3. If you consider the document to be **unsound** please indicate which test of soundness it does not meet:

- Justified
- Effective
- Consistent with national policy

4. Please explain why you consider the document is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.

If needed please continue on a separate sheet of paper.

As currently drafted and with the inclusion of the changes highlighted in this response the proposed submission version of the North London Waste Plan would meet the Authority's requirements.

In particular, the inclusion of new sites at Pinkham Way, Edgware Road and Geron Way and the protection of the strategic EcoPark site at Edmonton meet the land requirements of the Authority and subject to successful planning applications would enable the Authority to meet its needs in terms of current and future municipal waste processing within north London. The inclusion of a policy based approach to HWRC provision as detailed in Policy NLWP 3 is also supportive of our strategy for municipal waste management within the area. Accordingly as drafted the North London Waste Plan would enable the Authority to meet its statutory obligation to manage north London's municipal waste now and in the foreseeable future.

5. Please set out what change(s) you consider necessary to make the document legally compliant or sound, having regard to the option you have identified in question 4 where this relates to soundness. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Authority does not suggest any additional changes to the proposed submission version of the North London Waste Plan other than those listed above although a list of suggested factual changes is additionally submitted under separate cover.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination**

6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Yes, we wish to participate at the oral examination

7. If you consider it necessary to participate at the oral part of the examination, please outline why you consider this to be necessary:

The North London Waste Authority is the statutory body with responsibility for managing north London's municipal solid waste for the area covered by the North London Waste Plan. We would like to participate in the oral examination in order to support the current version of the Plan and in particular in order to justify the need for the new sites which have been allocated within Chapter 6.

*Please note the Inspector will determine the most appropriate procedure to adopt for hearing those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Date:

8<sup>th</sup> July 2011