

NORTH LONDON WASTE AUTHORITY

REPORT TITLE:

CONSULTATIONS AND POLICY UPDATE

REPORT OF:

HEAD OF OPERATIONS

FOR SUBMISSION TO:

AUTHORITY MEETING

DATE:

17 April 2014

SUMMARY OF REPORT:

This report provides Members with the regular update on consultations and policy issues affecting the Authority. On a national level the report seeks delegated approval to respond to DEFRA's call for evidence on the Refuse Derived Fuel Market in England if appropriate. At a regional level the Authority's proposed response to the Mayor of London's Draft Further Alterations to the London Plan consultation is attached as Appendix 1. The report also provides details of an officer response to a consultation by Thames Water on the Deephams Sewage Treatment Works which is some way to the north of the Edmonton EcoPark and for which Member approval is sought. An update is also provided on increased rates of landfill tax effective from 1 April.

RECOMMENDATIONS:

The Authority is recommended to:

- i) delegate authority to the Head of Operations in consultation with the Chair and Vice Chairs, to provide a response to DEFRA's call for evidence on the refuse derived fuel market in England if appropriate;
- ii) approve the response to the Draft Further Alterations to the London Plan (attached as Appendix 1);
- iii) approve the officer response to the Deephams Sewage Treatment Works Project Overview Phase 2 (attached as Appendix 2); and
- iv) note the increase to the rate of Landfill Tax payable by the Authority from £72 per tonne to £80 per tonne with effect from April 2014.

SIGNED:

Head of Operations

DATE: 8 April 2014

1. PURPOSE OF REPORT

1.1 This report provides an update on consultations and policy issues that are relevant to the Authority's operations. This includes:

- *for decision* - a summary of DEFRA's call for evidence on the Refuse Derived Fuel Market in England and a recommendation seeking delegated authority for the Head of Operations in consultation with the Chair and Vice Chairs to respond if appropriate (Section 2);
- *for decision* – a summary of the key issues and recommendation seeking approval for a draft Authority response to a consultation from the Mayor of London on Draft Further Alterations to the London Plan (Section 3);
- *for decision* – a summary of a consultation from Thames Water on the Deephams Sewage Treatment Works which is to the north of the Edmonton EcoPark and a recommendation seeking approval of the officer response provided (Section 4);
- *for noting* – details of the increased rates of landfill tax which apply from 1st April and details of the Chancellor's announcement in the March budget statement regarding future changes to the rates of landfill tax in the future.

2. CALL FOR EVIDENCE ON THE REFUSE DERIVED FUEL MARKET IN ENGLAND

2.1 DEFRA has issued a call for evidence in relation to Refuse Derived Fuel (RDF). The purpose of this call for evidence is to provide DEFRA with a greater understanding of the RDF market in England, any issues associated with the market, and how these might be addressed. Accordingly, the call for evidence is looking at both domestic use of RDF along with exports, posing a number of questions which are aimed at filling gaps in DEFRA's evidence base to help in determining whether there is a need for some form of intervention. Comment and views are invited.

2.2 The Authority is recommended to delegate authority to the Head of Operations in consultation with the Chair and Vice Chairs, to provide a response if appropriate to DEFRA's call for evidence on the refuse derived fuel market in England.

3. DRAFT FURTHER ALTERATIONS TO THE LONDON PLAN

3.1 From 15 January until 10 April 2014 the Mayor of London was consulting upon 'Draft Further Alterations to the London Plan' (FALP), the Mayor's spatial strategy for the capital. Officers have submitted a draft response in time for the deadline, but have advised that the Authority's response remains subject to approval at this Authority meeting.

- 3.2 The consultation response instructions made it clear that comments on unaltered policies, paragraphs, figures and tables would not be considered by the Mayor.¹ This instruction accordingly restricted the breadth of issues on which the Authority was able to focus its response.
- 3.3 A copy of the Authority officer response to the FALP is included as Appendix 1 to this report for Members to consider for approval.
- 3.4 The key issue about which Authority officers were concerned is whether there is any incompatibility between the FALP's statements regarding Mayoral aspirations for recycling and those regarding additional energy infrastructure, specifically Energy from Waste (EfW). These statements are included within Chapter 5 of the FALP: 'London's Response to Climate Change'.
- 3.5 The Authority response requests clarification on the question of whether the Mayor has a target in mind for the proportion or total amount of heat and power requirements to be met from EfW and by what date. An answer to this question would assist in determining whether any incompatibility exists between the targets for recycling and energy contained within the FALP.
- 3.6 The Authority is recommended to approve the officer response to the Draft Further Alterations to the London Plan attached as Appendix 1.

4. DEEPHAMS SEWAGE TREATMENT WORKS PROJECT OVERVIEW PHASE 2

- 4.1 Thames Water is planning a major upgrade to the Deephams Sewage Treatment Works located to the north of the Edmonton EcoPark. This upgrade is intended to modernise the works to replace worn out infrastructure, meet new treatment standards, cater for the expected increase in the population served, cope better with the predicted effects of climate change and reduce the odour from the site.
- 4.2 Thames Water has recently been consulting from 18 February on the plans to upgrade the Sewage Treatment Works (STW). Further details are available on Thames Water's website at <http://www.thameswater.co.uk/deephams/16659.htm>
- 4.3 This consultation was the second stage of the consultation process, the previous stage having been in 2012. As the Deephams STW is a close neighbour to the Edmonton EcoPark officers considered that it was appropriate to provide a response to the consultation which closed on 8 April.
- 4.4 The consultation process consisted of the provision of a consultation document describing the proposals to which stakeholders were invited to respond online. In addition to this document there has been a series of 'drop in' sessions about the proposals which anyone could attend and comment on the proposals. Finally there has been a number of 'Deephams Forum' meetings, and Authority officers have attended several of these.

¹ <http://www.london.gov.uk/priorities/planning/london-plan/draft-further-alterations-to-the-london-plan>

- 4.5 The officer response to the consultation is included in Appendix 2 of this report. The response notes that the plans are well thought out and are designed to meet the identified future requirements with the least possible disruption to the process. The site will continue to operate during the upgrade process. The response notes that if implemented as proposed, the Authority expects that the upgrade to the STW will provide improvements in environmental quality and benefits to local residents upon completion. In particular the officer response notes that the proposals will improve discharges from the sewage treatment works to the River Lee and the Salmon's Brook and will reduce the risk of flooding during storms.
- 4.6 The Authority is recommended to approve the officer response to the Deephams Sewage Treatment Works Project Overview Phase 2 attached as Appendix 2.

5. LANDFILL TAX

- 5.1 The landfill tax was brought into existence on 1 October 1996 and was initially set at a rate of £7 per tonne of material disposed of in landfill. The tax has steadily increased over time, and from 1 April 2014 will increase from £72 per tonne to £80 per tonne as expected. The current landfill tax for inert waste such as building materials and excavated earth remains £2.50 per tonne.
- 5.2 In terms of the future direction of landfill tax the Chancellor announced in his budget on 19 March that the standard and lower rates of landfill tax are to rise in line with inflation from April 2015. The Treasury has also announced that it will be consulting on the application of a 'loss on ignition' testing regime from April 2015 to determine whether material claimed to be inert qualifies for the lower £2.50 per tonne rate; this will be brought back to Members if and when necessary.
- 5.3 The Authority has already budgeted for the increase in landfill tax to £80 per tonne in 2014/15 and had allowed for an inflation increase thereafter in its medium term budget forecast.

6. COMMENTS OF THE LEGAL ADVISER

- 6.1 The Legal Adviser has been consulted in the preparation of this report and comments have been incorporated.

7. COMMENTS OF THE FINANCIAL ADVISER

- 7.1 The Financial Adviser has been consulted in the preparation of this report and has no comments to add.

Local Government Act 1972 - Access to Information

Documents used: DEFRA, Refuse derived fuel market in England Call for evidence. March 2014. <https://www.gov.uk/government/consultations/refuse-derived-fuel-market-in-england-call-for-evidence>

GLA, Draft Further Alterations to the London Plan. January 2014. <http://www.london.gov.uk/sites/default/files/FALP.pdf>

Eunomia Research and Consulting, Input to the NLWA Consultation Response to 'Draft Further Alterations to the London Plan', March 2014

Thames Water, Deephams Sewage Works Upgrade Consultation - phase 2, Our proposed upgrade. February 2014. <http://www.thameswater.co.uk/deephams/16659.htm>

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Response from the North London Waste Authority (NLWA) to Draft Further Alterations to the London Plan January 2014

1. Introduction

- 1.1 The North London Waste Authority (NLWA) is the statutory joint waste disposal authority for north London, with responsibility for managing the local authority collected waste from the following boroughs: Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. The NLWA has an interest in the London Plan because of the development framework that it creates for new waste management facilities in north London.
- 1.2 The NLWA has fully engaged in previous reviews of the London Plan², although the NLWA did not comment upon the proposed revised early minor alterations to the Plan in 2012-13, published in October 2013 as these updates were largely made to reflect legislative changes, principally the adoption of the National Planning Policy Framework (NPPF) and the government's approach to affordable housing.
- 1.3 The NLWA is pleased to be able to provide comment now on the draft further alterations to the London Plan. The NLWA notes that consultees are instructed not to comment upon unaltered policies, text, tables, maps and figures. Accordingly the NLWA principally comments upon those elements of the Plan for which alterations are proposed. Nevertheless where the NLWA believes that an unaltered part of the Plan merits review at this stage, this has been included in these representations. These detailed comments are organised according to the order of the document and only address those elements of the Plan about which the NLWA has an interest. At the start of the response the NLWA also makes some 'in principle' comments too.
- 1.4 NLWA Members have met to discuss the response to this consultation and additionally the Authority's consultants, ARUP, Eunomia Research and Consulting and Ramboll UK Limited have advised NLWA.

² The NLWA responded to The London Plan, Consultation draft replacement plan, Mayor of London, (October 2009); A New Plan for London, (April 2009); Planning for a Better London (July 2008) and the two associated Examinations in Public (EiP); the most recent being in 2010. The NLWA was a signatory to a joint statement by the statutory joint waste disposal authorities in London which was submitted to the 2010 EiP and NLWA officers were also involved in the consultation process associated with devising the waste apportionment modeling methodology incorporated into the current Plan.

2. Over-arching Comments

- 2.1 The Authority notes that the London Plan now takes the year 2036 as its formal end date whilst the 2011 version of the London Plan looked forward to 2031. The NLWA understands that this 22 year perspective will provide a longer term planning framework which should create greater strategic certainty for developers.
- 2.2 As a general comment the NLWA is also concerned that the London Plan establishes some tensions between waste and energy aspirations. Policy 5.16 (unchanged) on waste self sufficiency states that the Mayor will work with partners to manage as much waste in London as practicable and work towards managing the equivalent of 100% of London's waste within London by 2026; and the related paragraph 5.32 (amended) promotes new district heating networks being supplied by energy-from-waste facilities as evolving from natural gas powered facilities to minimise the need to use primary fossil fuels.
- 2.3 Policy 5.16 seeks to recycle more than 45% Municipal Solid Waste (MSW) by 2015, 50% by 2020 and 60% by 2031. Policy 5.16 also seeks to recycle more than 70% of commercial and industrial waste by 2020; and recycle more than 95% of construction, demolition and excavation waste by 2020.
- 2.4 There are however some difficulties with definitions that are arising. At 5.68 the document says "municipal household waste (MSW)", where the term MSW is also defined at Policy 5.16 in the usual way as "municipal solid waste" that includes all 'household waste' (as distinct from 'waste from households') and 'commercial wastes' collected or treated by local authorities (and also 'industrial wastes' if the disposal authority has consented to the collection authority). The paragraph is then amended to say that this is "also known as Local Authority Collected Waste", but elsewhere (including in 5.69 and importantly for Tables 5.2 and 5.3) the document uses the term "municipal waste" rather than MSW or Local Authority Collected Waste (LACW). When very stretching targets are being set for land-use policies in relation to local authority recycling and self-sufficiency for waste, it is most important that the definitions are clear. It may be appropriate therefore to review the defined terms and to make any consequent minor changes throughout the document so that it is clear when establishing baselines, and denominators and when measuring future performance; this would avoid confusion with the definition of 'municipal waste' that has arisen from European law but is used elsewhere in English law as "waste from households or waste from other sources which is similar in nature or composition"³. Such a review might also clarify the full extent of LACW that is to be considered from the London Plan perspective and confirm, for example, that it only includes those wastes that waste collection authorities deliver to their waste disposal authority or to a third party for re-use, recycling or composting.
- 2.5 The NLWA also wishes to note that the Plan's recycling targets assume that 85% of household waste is recyclable. It is understood that this figure is taken from WRAP research, but the NLWA understands this to be a maximum percentage of what is theoretically recyclable that has not been tempered by considerations of practicability, affordability or net environmental benefit of extracting this amount to a quality that is suitable for recycling. It is also not clear how this percentage has been incorporated into the municipal waste

³ See <https://www.gov.uk/local-authority-collected-waste-definition-of-terms>

recycling target, so it would also be helpful for this to be clarified within any amended definitions.

- 2.6 In addition to the above recycling aspirations, Policy 5.5 states that the Mayor expects 25% of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025.
- 2.7 Although Policy 5.5 (Decentralised Energy Networks) remains unchanged, the supporting text alterations put an increased emphasis on the capture of energy from waste as well as secondary heat sources. The NLWA is concerned that without clear guidance the amended plan could create a tension between recycling and energy aspirations. A carbon-based approach to evaluating waste management proposals may assist in setting priorities to ease this tension, but the NLWA recommends that greater clarity is provided in the plan or in supplementary planning guidance on how this tension should be mediated in Local Plans and in planning decisions.
- 2.6 In addition, the NLWA is concerned that there is no explicit target for either the proportion or the actual amount of heat and power needs that are to be met by EfW and that there is no timescale specified for the transition to generating energy from waste. The competing demands for waste to be recycled or used to generate energy cannot be resolved without this detail and it would be most helpful if the Mayor would specify these within the London Plan.
- 2.7 Clarification of the relative priorities of recycling and decentralised energy generation should be provided within the London Plan and the relationship to the waste hierarchy should be published to provide clarity on these matters.
- 2.8 In addition, it would be helpful to include definitions of “decentralised energy networks” and “decentralised energy” within the glossary.
- 2.9 Further consideration of this issue including the percentage contribution to Mayoral energy aspirations that could be made from the Authority’s wholly owned waste management company with operates the Edmonton energy recovery facility is detailed in Appendix 1 to this response.

3. Chapter Two - London’s Places

3.2 Policy 2.18 Green Infrastructure

- 3.2.1 There appears to be a lack of clarity in relation to some terms, in particular “green infrastructure”, “open space” and “green space”.
- 3.2.2 The NLWA would suggest that the term ‘green infrastructure’ which is defined in paragraph 2.88 of the consultation document should be consistent with the definition included in the glossary, which is currently different.
- 3.2.3 The replacement of the term ‘open space’ with the term ‘green space’ is somewhat confusing as the term ‘open space’ is defined in the glossary but the term ‘green space’ is not. The NLWA suggests that if these two terms are describing different things, then separate definitions should be provided; but if they are describing the same thing only one term should be used.

4. Chapter Three – London’s People

4.1 Health impact assessments (HIAs)

4.1.1 Policy 3.2 inserts “for example” before “Health Impact Assessments” which implicitly recognises that HIA is not the only means by which health impacts of new development are considered. This is clarified by amended Paragraph 3.8, which identifies that an HIA would be needed where a development or plan is anticipated to have significant implications for people’s health and wellbeing. The NLWA supported the amendments to Policy 3.2 on the basis that, as with all technical assessments, HIA should be required only where there is a potential for significant effects.

4.1.2 It would be helpful if this section of the London Plan could identify who is responsible for deciding if a HIA is required and/or if a development or plan is going to have ‘significant’ implications for health and wellbeing. Different stakeholders may have different views about the potential impact of a plan or development so some guidance would be helpful in order to identify how this impact is assessed.

4.2 Population and housing trends

4.2.1 As detailed elsewhere in the consultation document, the uncertainties regarding London’s future population and housing growth rates are clearly highlighted in paragraphs 3.16 and 3.16a and b. The NLWA supports the approach to take the ‘middle’ projection for planning purposes and for boroughs to plan accordingly in the light of this uncertainty.

5. Chapter Four – London’s Economy

5.1 The NLWA is supportive of the insertion of Policy 4.1 a 2 which states that “the Mayor will work with partners to maximise the benefits from new infrastructure to secure sustainable growth and development”. New infrastructure can deliver significant wide-reaching benefits to the London economy and the NLWA endorses the recognition that the Mayor gives to the value of the employment, regeneration, productivity and economic benefits arising from such new infrastructure development. The Mayor should not overlook however the limited powers of the four statutory joint waste authorities that serve some two-thirds of London.

6. Chapter Five – London’s Response to Climate Change

6.1 Decentralised energy

6.1.1 The NLWA notes the addition of paragraph 5.9A and specifically the desire for decentralised energy across the capital. The NLWA does not disagree with the vision set out in paragraph 5.9A but it considers that the vision and policies in support of decentralised energy should be subject to tests of feasibility and viability.

6.1.2 The NLWA acknowledges that no changes to policy are proposed for decentralised energy networks. However, the proposed new supporting text places a greater emphasis on the role of energy from waste and secondary heat sources to supply future district heating networks (FALP para 5.32). Waste is an acknowledged feedstock for decentralised energy but the London

Plan should acknowledge that waste disposal authorities and other feedstock suppliers may have statutory obligations which lie elsewhere, e.g. the management of waste in accordance with the waste hierarchy and the national waste management framework. In short, future proposed policies within the London Plan in relation to decentralised energy should not undermine the feasibility and viability of proposed new waste management infrastructure and it is suggested that future policy retains flexibility in its application to reflect this. Otherwise, the NLWA and others could find themselves faced with unaffordable or undeliverable planning requirements being imposed on proposed developments. This could lead to delay in the delivery of new waste management facilities, which in turn would lead to more material going to landfill, increased environmental impacts, and potentially higher council tax bills for London residents.

6.2 Waste

6.2.1 The NLWA notes the change in paragraph 5.65 which recognises that the application of the waste hierarchy may on occasion conflict with achieving the greatest climate change mitigation benefits. The NLWA is supportive of this change.

6.2.2 The NLWA notes the changes to paragraph 5.67 which reference the understanding that solid recovered fuel (SRF) may need to be transported out of London including to elsewhere in Europe in the short term whilst London markets are established. The NLWA also recognises the addition to this paragraph which states that the transport of fuel outside of London should only be considered as an interim option with commercial arrangements reflecting the ambition to maximise the management of the capital's waste within its boundaries in the longer term.

6.2.3 However, introducing this restriction whilst the requirement for the SRF fuel to be a 'biomass fuel' as defined in the Renewable Obligation Order 2013 (as outlined in paragraph 5.75) is unrealistic. The majority of SRF that is being produced will not have sufficiently high biomass content to be a 'biomass fuel' as defined in the Renewable Obligation Order and therefore will not meet the requirements set out in the London Plan as waste being 'managed in London'. Therefore even if it is subsequently used as fuel within London for example following a period of export, it is unlikely to qualify as waste managed in London. A solution might be for the Mayor to accept as 'managed in London' wastes that can be categorised as from "renewable sources" in accordance with the same Renewable Obligation Order, perhaps using the 50% non-fossil fuel provision in the Order for generating stations in which municipal waste is used.

6.3 Waste capacity

6.3.1 Policy 5.17 together with new supporting text at Para. 5.85 introduces the new carbon intensity floor (CIF) standard for all energy from waste (EfW) facilities. The NLWA welcomes the flexibility introduced in the policy and supporting text that a new EfW must "meet, or demonstrate that steps are in place to meet" the target CIF level of 400 g CO₂e/kWh of electricity produced.

6.3.2 The supporting text at Para 5.85A (as amended) goes on to state that the CIF target level would:

“This would, for example, rule out new mass burn incineration facilities of mixed waste generating electricity only, but may allow combustion of waste with high biomass content where both heat and power generated are used. This approach supports technologies able to achieve high efficiencies particularly when linked with gas engines and hydrogen fuel cells.”

6.3.3 Modelling using the Environment Agency’s WRATE modelling tool recently carried out for the NLWA has examined a range of scenarios for the use of conventional incineration of residual municipal solid waste to provide electricity to the local grid and provide heat to a district heating network, i.e. in CHP mode. The exercise has identified a number of scenarios which could satisfy the CIF. The NLWA concludes that the supporting text quoted above does not accurately reflect the impact of the CIF target level. The NLWA proposes therefore that the above quoted text is amended to read:

This would, for example, rule out new mass burn incineration facilities of mixed waste generating electricity only, but may allow combustion of waste ~~with high biomass content~~ where both heat and power generated are used. This approach supports technologies able to achieve high efficiencies particularly when linked with gas engines and hydrogen fuel cells.

6.3.4 In making the above proposal the NLWA is acutely aware of the need for waste disposal authorities and other waste operators to strike an appropriate balance between affordability and sustainability. Conventional incineration in the form of advanced moving grate facilities are a proven and cost-effective energy recovery solution which should therefore not be excluded from consideration. In contrast to advanced thermal treatment solutions, a new conventional EfW facility located in reasonable proximity to existing and future heat loads could provide London with a viable, reliable large-scale low carbon decentralised energy solution.

6.3.5 Related to the above point, the NLWA notes that no alterations are proposed to the definition at Para. 5.75 of waste which is “managed in London”. For reference the definition is that waste is deemed to be managed in London if:

- *It is used for energy recovery by anaerobic digestion (AD), gasification, pyrolysis or an existing incinerator.*
- *It is compost or recyclate sorted or bulked in London or sent to a MRF either in London or elsewhere.*
- *It is biomass fuel.*

6.3.6 Taking account of the FALP’s proposed use, through the CIF, of carbon impact as the core acceptability indicator for EfW proposals in London, the NLWA considers that it is unnecessary for the “managed in London” definition to impose a blanket exclusion on new incinerators. If all EfW proposals must meet the CIF standard, then a new energy-from-waste incinerator in London which meets the CIF standard should, subject to other material considerations, be permitted and the waste should be counted as managed in London.

- 6.3.7 The NLWA therefore proposes that the word “existing” before “incinerator” is deleted from FALP Paragraph 5.75 in order to assist the new FALP energy provisions.
- 6.3.8 Similarly, the NLWA proposes that the following text in Para. 5.89 should be deleted: “Energy recovery should be carried out through advanced conversion techniques, ie gasification, pyrolysis or anaerobic digestion, or any combination of these.”
- 6.3.9 The Authority welcomes the strike-outs in paragraphs 5.84 and 5.85 relating to technology preferences. The NLWA understands that the GLA has a technology neutral stance for waste treatment, instead focusing on carbon and energy efficient outcomes. However, in paragraph 5.86 the statement that “*Energy recovery should be carried out through advanced conversion techniques, i.e. gasification, pyrolysis or anaerobic digestion, or any other combination of these*” still remains in the text. The Authority proposes that these words are also struck-out to ensure a clear and consistent approach to waste processing technologies.

6.4 Heat off-take

- 6.4.1 The new additions in the text in paragraph 5.85A reference the need for waste to energy facilities to be equipped with a heat off-take from the outset such that a future heat demand can be supplied without the need to modify the heat producing plant in any way or entail its unplanned shutdown.
- 6.4.2 ‘Waste to energy’ facilities are not defined within the glossary of the London Plan. The NLWA proposes that a definition is provided for the purposes of this requirement to clarify when it will be applied. For instance, anaerobic digestion is an ‘energy from waste’ technology but in some cases a heat off-take will not be appropriate, such as for small plants or when the biogas product will be used for gas grid injection or as fuel for vehicle fleets. In order to ensure that such facilities are not captured by the requirement to be fully heat-enabled, it may be that the definition explicitly excludes non-thermal treatment facilities. It may not be realistic for example to require an anaerobic digestion plan to have a heat off-take.
- 6.4.3 For those waste facilities that are required to be heat-enabled, it will also be necessary for the Plan to provide a mechanism by which the amount of heat they should be ready to supply can be decided. Such information will be needed at the initial design stage, as it will be an intrinsic part of specifying the electricity generating turbines; and turbines are significant items of capital expenditure that determine to a large extent the energy-efficiency of a facility and that last for decades.

6.5 Hazardous waste

- 6.5.1 Policy 5.19 and the supporting text which follows now include some helpful additions which are supported by the NLWA. The strategic role of the Mayor of London through the RTAB to work with neighbouring authorities to monitor capacity of hazardous waste facilities and to identify opportunities for new treatment capacity in London is recognised within the text and this was something that the NLWA and the other statutory joint waste disposal authorities had called for during previous consultation stages e.g. in response to the London Plan Examination in Public in 2010.

- 6.5.2 The proposed amendments to the Plan do not go so far as to specify that if a hazardous waste facility is under threat from another use, what means will be used to decide whether it should be compensated for in type as well as in volume; although this was something that the NLWA and others had previously asked for. However, given the central monitoring role of the RTAB and others, the NLWA would hope that this issue would be addressed if and when it arose. Therefore, the NLWA is not proposing that this detail is included in the FALP but is simply noting that the requirement for ongoing monitoring of London's capacity for managing hazardous waste will need to be kept under review and that particularly if hazardous waste facilities are lost to compensatory non-hazardous treatment facilities that alternative hazardous capacity may need to be identified.

7. Chapter Six – London's Transport

- 7.1 The NLWA has no comments on this chapter.

8. Chapter Seven – London's Living Places and Spaces

- 8.1 The NLWA has no comments on this chapter.

Deephams Sewage Treatment Works upgrade consultation
April 2014

Response from the North London Waste Authority

Further details of this consultation are available on Thames Water's website at
<http://www.thameswater.co.uk/deephams/16659.htm>

Building the upgrade

1. How much do you agree or disagree with our plans for the upgrade of Deephams Sewage Works? (Please see the 'Our proposed upgrade' leaflet for more information)

Strongly agree

Please explain your answer:

The plans are well thought out and are designed to meet the identified future requirements with the least possible disruption to the process. The site will continue to operate during the upgrade process and is expected to provide real improvements in environmental quality and benefits to local residents upon completion if implemented as proposed.

2. Please give us your comments on our proposed layout for the upgrade (Please see page 4 of the 'Our proposed upgrade' leaflet for more information)

Please give us your comments:

The proposed layout for the upgrade is a sensible use of the available space and would allow room for future additional treatment capacity if this is required.

3. Please give us your comments on the alternative layout we have looked at and any other options that you think we should consider? (Please see page 4 of the 'Our proposed upgrade' leaflet for more information)

Please give us your comments:

The Authority accepts that the alternative layout has been properly considered and found to be less suitable than this proposal.

Odour

4. How much do you agree or disagree with our proposals to reduce the odour produced by the sewage works? (Please see page 5 of the 'Our proposed upgrade' leaflet for more information)

Strongly agree

Please explain your answer:

The Authority recognises that a lot of work has been put into trying to understand and reduce odour generation from the sewage treatment works and supports the proposals to reduce the amount of odour generated.

Noise and dust

5. How much do you agree or disagree with our proposals to reduce noise and dust while we build the upgrade?(Please see the 'Being a good neighbour' leaflet for more information)

Strongly agree

Please explain your answer:

It is inevitable that there will be an increase in noise and dust during the construction phase but it appears that Thames Water is doing all it reasonably can to limit the impacts.

Construction traffic

6. How much do you agree or disagree with our proposals to manage traffic while we build the upgrade? (Please see the 'Being a good neighbour' leaflet for more information)

Strongly agree

Please explain your answer:

It is recognised that Thames Water is doing all it reasonably can to limit the impacts of traffic during the construction phase.

Environment

7. How much do you agree or disagree with our proposals to assess and reduce our impact on the environment? (Please see the 'Environment' leaflet for more information)

Strongly agree

Please explain your answer:

The proposals are expected to improve the quality of discharges from the sewage treatment works to the River Lee and the Salmon's Brook and to reduce the risk of flooding during storms. Both of these measures would be of benefit to the local environment.

Community benefits

8. How much do you agree or disagree with the benefits the upgrade will provide for the local community? (Please see page 11 of the 'Our proposed upgrade' leaflet for more information)

Strongly agree

Please explain your answer:

The proposals are expected to provide an increase in local employment during the construction period and safeguard the existing jobs in the long term.

Additional comments

9. Please give us any other comments you may have about the Deephams Sewage Works Upgrade.

Final comments:

The Authority welcomes the chance to comment on the proposed upgrade and will continue to work with Thames Water to improve the local environment and benefits to the local community.

The answers included in this response are made by officers and cannot be approved by Members until the Authority meeting on 17 April 2014. The Authority will make a further submission if any changes are made by Members at that meeting.

About you

10. What is your name?

Name:

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11. What is your organisation?

Organisation:

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15. If you would like us to keep you updated as the upgrade progresses, how would you like us to contact you?

Letter

REPORT ENDS