

NORTH LONDON WASTE AUTHORITY

REPORT TITLE:

**THE LONDON PLAN
SPATIAL DEVELOPMENT STRATEGY FOR GREATER LONDON
Consultation draft replacement plan and associated planning matters**

REPORT OF:

HEAD OF WASTE STRATEGY AND CONTRACTS

FOR SUBMISSION TO:

AUTHORITY MEETING

DATE:

9th DECEMBER 2009

SUMMARY OF REPORT:

This report sets out the principal matters raised in a public consultation by the Mayor of London on a draft replacement version of the London Plan (Spatial Development Strategy for Greater London) and additionally seeks delegated approval to provide a further response, if appropriate, to a consultation on revised borough waste apportionment figures which are shortly due to be issued as part of the update to the London Plan.

The report also notes that a number of the constituent borough councils are shortly to start public consultations on their 'core' planning strategies and accordingly seeks delegated authority to provide a response to the same, should insufficient time be available for responses to be brought to future Authority meetings.

RECOMMENDATIONS

The Authority is recommended to:

- (i) Approve the draft response to The London Plan, Spatial Development Strategy for Greater London, Consultation draft replacement plan, October 2009 as enclosed at Appendix 1.
- (ii) Delegate authority to the Head of Waste Strategy and Contracts in consultation with the Chair and Vice Chairs, to submit a response to the revised borough waste apportionment figures consultation should insufficient time be available for this to be brought to a full Authority meeting.
- (iii) Delegate authority to the Head of Waste Strategy and Contracts in consultation with the Chair and Vice Chairs, to submit a response to relevant borough 'Core Strategy' consultations should insufficient time be available for these to be brought to a full Authority meeting.

**Signed by: Head of Waste Strategy and
Contracts**



Date: 30th November 2009

1. INTRODUCTION TO THE LONDON PLAN

- 1.1 The London Plan sets out the Mayor's vision for London and his general policy for land use and development across the capital. The London Plan describes an integrated economic, social, environmental and transport framework for the development of London over the next 20-25 years. London boroughs' local plans need to work within this larger structure, and the London Plan's policies guide decisions on planning applications by councils and the Mayor.
- 1.2 The first London Plan was published in 2004; since then two sets of alterations have been made to it and an updated version bringing these alterations together was published in February 2008: The London Plan, Spatial Development Strategy for Greater London, Consolidated with Alterations since 2004. The Plan is now being updated again, and as a result the Mayor of London launched a thirteen week public consultation on a draft replacement for the London Plan on 12th October. The deadline for a response is 12th January 2010.
- 1.3 The Mayor of London is legally required to keep the London Plan under review. Government guidance also sets out the procedure to be followed when he decides that the Plan should be amended (or 'altered' under planning law), or when he decides there should be a completely new (or 'replacement') Plan. The consultation document introduction and overview sets out the reasons why the Mayor considers that a replacement plan is now necessary and why this replacement Plan should be produced as soon as possible, namely:
1. Although the Plan has been kept up-to-date, the basis of the Plan and the policies it sets out date back to before 2004.
 2. Since 2004, much has changed.
 3. The status of the Plan has altered with the new planning legislation giving it formal status as part of the development plan.
 4. Following the election of a new Mayor for London in May 2008, the new Mayor issued a public consultation document outlining his intended approach to planning, 'Planning for a Better London', July 2008, to which the Authority responded. The feedback from this consultation indicated that consultees were strongly in favour of the Mayor moving to a full review of the London Plan, leading to a replacement Plan, rather than changing the Plan incrementally over his term of office.
 5. Producing a new Plan at this time would also reduce uncertainty for the London boroughs at a time when they are drawing up their development plan documents under a new (since 2004) national planning framework.
 6. The Mayor also believes it is very important to set a clear spatial framework reflecting his policies and priorities as early as possible.

- 1.4 It is anticipated that the new replacement London Plan will be published towards the end of 2011 and will run for the period up to 2031.

2. SUPPORTING DOCUMENTATION

- 2.1 Accompanying the consultation draft replacement Plan and for consideration as part of the same is the report produced following a full Integrated Impact Assessment or IIA. The IIA covers the legal requirements to carry out a Sustainability Appraisal (SA) (including a Strategic Environmental Assessment (SEA) and a Habitats Regulation Assessment (HRA)). The IIA also considers health, equalities and community safety. The IIA report has been reviewed as part of the Authority's draft consultation response.

3. LONDON'S RESPONSE TO CLIMATE CHANGE

- 3.1 Chapter 5 of the consultation draft of the London Plan sets out London's proposed response to climate change. This chapter of the Plan is of particular relevance to the Authority as it covers waste as well as decentralised and renewable energy. The key changes from the previous Plan are outlined in the section following.

Waste self sufficiency

- 3.2 Policy 5.16 of the draft replacement Plan outlines the Mayor of London's proposals for regional self-sufficiency in terms of waste management. The key changes are as follows:

- A new target to work towards zero waste to landfill by 2031.
- Increased recycling/composting levels for municipal waste as follows:

Municipal solid waste recycling/composting levels to be exceeded by:	Current London Plan – 2008	Consultation Draft London Plan - 2009
2015	35%	45%
2020	45%	50%
2031		60%

These targets are, according to the consultation draft Plan, in line with those set by the South London Waste Partnership, West London Waste Authority, the NLWA and the East London Waste Authority, (although the North London Joint Waste Strategy only sets a target for 50% reuse, recycling and composting by 2020 and the period of the North London Joint Waste Strategy only runs from 2004 to 2020).

- An increased target for recycling and reuse of construction, excavation and demolition waste to exceed 95% by 2020, (previously to reach 95% by this date).
- Revised waste tonnage projections as outlined in the table below:

Tonnage of waste produced in London	Current London Plan – 2008	Consultation Draft London Plan - 2009
'Current' position	18.1 m tonnes	22 m tonnes
2020 prediction	23.6 m tonnes	
2031 prediction		34 m tonnes

- For the purposes of meeting self sufficiency, which remains at 85% of London's waste to be managed within the capital by 2020, the key change in the consultation draft plan is that 'solid recoverable fuel' SRF produced in London is now deemed to be 'managed in London' and therefore contribute towards the self sufficiency target as long as it is a 'biomass fuel' as defined in the current Renewable Obligation Order. This, according to the Plan, will encourage the production of high quality waste derived fuel that can be used to generate renewable energy using a range of technologies including gasification, which qualify for double Renewable Obligation Certificates (ROCs).

Waste capacity

3.3 Policy 5.17 outlines the Mayor of London's approach to ensuring sufficient capacity for managing waste within the city. The consultation draft London Plan sets out a series of evaluation criteria against which proposals for waste management developments should be evaluated. These include:

- Locational suitability
- Proximity to the source of the waste
- The nature of the activity proposed and its scale
- A positive carbon outcome of waste treatment methods and technologies (including the transportation of waste, recyclates and waste derived products) resulting in greenhouse gas savings, particularly from treatment of waste derived products to generate energy
- The environmental impact on surrounding areas, particularly noise emissions, odour and visual impact and impact on water resources

- The full impact of all collection, transfer and disposal movements, particularly maximising the potential use of rail and water transport using the Blue Ribbon Network.

3.4 This policy also explicitly states that the following will be supported:

- Developments that include a range of complementary waste facilities on a single site.
- Developments for manufacturing related to recycled waste.
- Developments that contribute towards renewable energy generation, in particular the use of technologies that produce renewable gas.
- Developments for producing renewable energy from organic/biomass waste.

3.5 The consultation draft London Plan also identifies a need for boroughs within their Local Development Frameworks, to allocate sufficient land and to identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the London Plan. (These are the amounts of waste that the London Plan allocates to each borough for management, based upon the suitability of each borough to host facilities, including a consideration of the amount of waste that they themselves produce).

3.6 It is anticipated and the consultation draft of the London Plan states that the Mayor will publish for public consultation later in 2009, new projected borough-level waste arisings and apportionments for municipal solid waste and commercial and industrial waste. However, these revised tonnage apportionment figures were not available at the time of writing this report.

3.7 It is not anticipated that the method by which the tonnages of waste to be managed and apportioned to each borough will change, rather that the total amount of waste to be managed will change.

Construction, excavation and demolition waste

3.8 Policy 5.18 of the consultation draft of the London Plan outlines the Mayor of London's proposals for the management of construction, excavation and demolition (CE&D) waste within London. This includes the encouragement of new CE&D waste management facilities at existing waste sites, ensuring that major development sites are required to recycle CE&D waste on-site wherever practicable, supported through planning conditions and that waste should be removed from construction sites and materials brought to the sites by water or rail transport wherever this is practicable. The policy also states the requirement for developers to produce site waste management plans to arrange for the efficient handling of CE&D waste and materials.

3.9 Whilst not significantly different from the policies contained within the current version of the London Plan, the new Policy 5.18 is more explicit about the requirements for CE&D waste and incorporates the requirement for site

waste management plans which are a new development since 2004, when the current Plan was initially drafted.

Hazardous waste

3.10 Policy 5.19 of the consultation draft of London Plan is focussed on hazardous waste. This states that the Mayor of London will work in partnership with the London boroughs, the Environment Agency, industry and neighbouring regional and local authorities to identify the capacity gap for dealing with hazardous waste and to provide and maintain direction on the need for hazardous waste management capacity. This policy is identical to that which is included within the 2008 London Plan.

Decentralised energy in development proposals

3.11 Other sections of Chapter 5 of the consultation draft of the London Plan cover additional aspects of London's response to climate change, including policies for green roofs, flood risk management, sustainable drainage and water quality and sewerage infrastructure.

3.12 Policy 5.6 outlines the Mayor of London's position on decentralised energy in new developments. The policy states that:

- Development proposals should evaluate the feasibility of Combined Heat and Power (CHP) systems, and where a new CHP system is appropriate, also examine opportunities to extend the system beyond the site boundary to adjacent sites.
- Major development proposals should select energy systems in accordance with the following hierarchy:
 - Connection to existing heating or cooling networks;
 - Site wide CHP network;
 - Communal heating and cooling.
- Potential opportunities to meet the first priority in this hierarchy are outlined in the London Heat Map tool. Where future network opportunities are identified, proposals should be designed to connect to these networks.

3.13 The explanatory text to this section states that 'opportunities to incorporate energy from waste, or where technically feasible, renewable energy, should be investigated'. Although it is noted that the design of any systems should seek to minimise any impacts on air quality.

Renewable energy

3.14 Policy 5.7 of the consultation draft London Plan outlines the Mayor of London's proposals in respect of renewable energy. A table (5.1) in the consultation draft London Plan outlines the targets for installed energy capacity generated from renewables and the anticipated sources year on year. The sources include biomass heat and power of different sizes,

photovoltaics, solar thermal, anaerobic digestion etc. Table 5.1 of the consultation draft Plan is an updated version of table 4A.1 in the current Plan.

3.15 The key differences between the current London Plan and the consultation draft in terms of renewable energy are that:

- The total anticipated electrical output from renewables is significantly increased in the consultation draft, compared to the current Plan, as outlined in the table below:

Renewable energy in London – by year	Current London Plan – 2008	Consultation Draft London Plan - 2009
Energy capacity – 2015		237 MWe
Energy output – 2015		1,223 GWh
Energy capacity – 2020	375.1 MW	474 MW
Energy output – 2020	1,385,969 MWh	2,368 GWh
Energy capacity – 2025		804 MWe
Energy output 2025		3,430 GWh

- A new table within the Plan also includes the anticipated heat output from renewables which is not included in the current Plan.
- The biodegradable element of incineration plant is now included, this is not included in the current Plan.
- A much wider range of technologies is now seen as potentially contributing to renewable energy generation in London, compared to the current Plan.

3.16 In addition to the above, Policy 5.1 in the consultation draft London Plan sets out the Mayor of London’s targets for climate change mitigation – specifically to seek a 60% reduction in carbon dioxide emissions by 2025 relative to 1990 levels. An additional part of this policy states that borough Local Development Frameworks should include detailed policies and proposals that are consistent with the achievement of the Mayor’s strategic carbon dioxide emissions reduction target in London.

3.17 Policy 5.2 on minimising carbon dioxide emissions states that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following hierarchy:

- Be lean: use less energy

- Be clean: supply energy efficiently
- Be green: use renewable energy

3.18 The policy goes on to set a number of specific targets for carbon dioxide emissions reduction in buildings for all major development proposals. The Authority's draft response does not comment on this issue but these targets will need to be addressed as part of any planning submissions for sites, as the targets will be applied to developments.

4. **SUB-REGIONS AND OPPORTUNITY AND INTENSIFICATION AREAS**

Planning sub-regions

4.1 For the purposes of the consultation draft London Plan it is first worth noting that any reference to the 'North' sub-regional planning area refers only to the NLWA boroughs of Barnet, Enfield and Haringey. Hackney and Waltham Forest fall within the Eastern sub-region and Camden and Islington within the Central sub-region.

4.2 Additionally the consultation draft London Plan has also identified some boroughs as being located within 'outer London' and others in 'inner London'. The former area includes the NLWA boroughs for Barnet, Enfield Haringey and Waltham Forest, whilst Camden, Hackney and Islington are located within the Inner London area. It is specifically worth noting that as the Mayor of London has formed an Outer London Commission to 'identify the extent to which outer London has unrealised potential to contribute to London's economic success, the factors which are impeding it from doing so and the economic, social and environmental benefits that could be achieved', it is possible that we could see a slightly different approach being taken to the Authority's outer London boroughs over forthcoming years by the London Mayor. However, it is too early to say whether this will have any impact upon the Authority's approach.

Opportunity and Intensification Areas

4.3 Annex 1 to the consultation draft London Plan outlines a series of Opportunity and Intensification Areas and the opportunities that exist in each. These areas include parts of the NLWA area including:

- Cricklewood/Brent Cross – identified as a potential Strategic London Development Centre. The area description states that 'A site for a major waste facility within the area will form a key role in North London Waste Strategy'.
- Upper Lee Valley – containing growth points at Tottenham Hale, Blackhorse Lane, Central Leaside and Ponders End, the description for this Opportunity and Intensification Area states that: 'Adequate capacity should be retained to meet industrial needs including waste management and strategic logistics functions.' The description also notes that 'London's largest waste facility is located at Edmonton Eco Park and this facility has potential to provide heat and power to neighbouring developments.'

5. IMPLICATIONS FOR THE AUTHORITY

Self sufficiency

- 5.1 The consultation draft London Plan sets increased targets for recycling and composting municipal waste. These targets go beyond those included within the current North London Joint Waste Strategy (NLJWS).
- 5.2 The Authority and borough partners' targets, which are outlined in the NLJWS are in line with the current national waste management strategy (Waste Strategy 2007, for England) and in line with the existing waste management strategy for the capital, (Rethinking Rubbish in London, GLA, September 2003). However, as it is anticipated that the latter is to be shortly amended it is possible that the municipal waste targets for the capital as contained within the London waste strategy could also increase. As the NLJWS must be in conformity with the latter there is a risk that the partners could face a requirement to increase the levels of recycling and composting of municipal waste in North London still further, (beyond the current strategy years) which would have resources implications for all partners.
- 5.3 The change within the consultation draft London Plan for SRF production within London to be counted as waste being managed within London, is however a potentially very beneficial change for the Authority because it would assist the North London area in meeting self sufficiency targets and accordingly this change is supported in the Authority's draft response.

Waste capacity

- 5.4 The explicit support for a range of waste technologies as outlined in the consultation draft London Plan potentially provides both greater flexibility and guidance for contractors bidding for the Authority's main procurement contract post 2014 than is included within the current London Plan.
- 5.5 It is unfortunate that the revised apportionment figures for North London were not produced at the time this report was prepared as they could potentially have an impact upon the Authority's plans and in particular the amount of land that the North London Waste Plan, the spatial strategy for north London, is likely to allocate for waste use, in line with the apportionment requirements.

Other waste streams

- 5.6 CE&D waste policies are not substantially altered compared to the current version of the London Plan and although the requirements for waste management plans will impact upon any new building of waste management facilities in the area, as these requirements are already included within national legislation, there are no significant additional implications to be reported upon here.
- 5.7 As there is no change proposed to the current policy in relation to hazardous waste within the London Plan, there is no need to make additional comment here. However, elsewhere on this Authority agenda, the Authority's draft response to the North London Waste Plan, notes the need to protect existing

hazardous waste sites from being lost and the strategic importance of the same.

Decentralised and renewable energy

5.8 The sections of the consultation draft London Plan relating to decentralised and renewable energy potentially provide opportunities for the Authority and as such are supported in the Authority's draft response to the consultation. What is missing in the London Plan, and may be addressed in the imminent Climate Change and Energy Strategy, also due to be published shortly by the Mayor of London, is how many waste sites might be connected to demand, who funds the infrastructure associated with this, and when any demand might come on stream and its relationship to the delivery of waste facilities. A comprehensive programme is being developed for the Thames Gateway region, and this perhaps provides a helpful template for what could be achieved in other areas. (A draft energy strategy for the Upper Lee Valley Opportunity Area Planning Framework (OAPF) will be published for consultation in the next few weeks and this might additionally provide further guidance).

Opportunity and Intensification Areas

5.9 Two of the opportunity and intensification areas identified within the draft consultation London Plan which are within the Authority's area refer to waste management, in particular the Brent Cross/Cricklewood area to the west and the Upper Lee Valley to the east.

5.10 The Upper Lee in particular offers the potential for a green enterprise zone recognising the regeneration opportunities from green industries, but this also requires that industrial land be protected from release for example for residential use. The two approaches of either developing an area of resource management industries or new residential development that could act as a potential user of renewable energy and heat (from waste) may not therefore be directly compatible.

5.11 The Authority's response recognises this tension, but urges consideration of the opportunities that waste management can create, whilst additionally recognising that local residents may remain unconvinced about having a 'resource management' business on their doorstep, even if it does create local employment opportunities.

6. ASSOCIATED PLANNING MATTERS

Waste Apportionment Update

6.1 Officers have been advised through a London Plan consultation 'roadshow' that revised and updated waste apportionment figures, i.e. the amount of waste which each borough is required to manage as part of the London Plan, will be issued shortly for consultation.

6.2 It is not anticipated that the methodology by which the apportionments are calculated will change, but merely that the total amounts of waste to be managed in London will have altered and therefore the amount to be managed by each borough will have been updated.

- 6.3 It is anticipated that the consultation period for this minor amendment may not enable the Authority's response to the same to be brought back to the next Authority meeting. Accordingly Members are recommended to delegate authority to the Head of Waste Strategy and Contracts in consultation with the Chair and Vice Chairs, to submit a response to the revised borough waste apportionment figures consultation should insufficient time be available for this to be brought to a full Authority meeting.

Borough Core Strategies

- 6.4 As part of borough planning frameworks 'Local Development Frameworks', each borough has to produce a 'Core Strategy'. These Core Strategies set out the long-term vision for the local planning authority's area, and the objectives and strategic policies to deliver that vision. It is anticipated that a number of the boroughs will be issuing draft core strategies for public consultation over the forthcoming months.
- 6.5 Although the Authority may not wish to comment upon all of these, it may wish to make comment on some. As it is possible that the timing of some of these Core Strategy consultations may not fit well with Authority meeting timetables, Members are recommended to delegate authority to the Head of Waste Strategy and Contracts in consultation with the Chair and Vice Chairs, to submit a response to relevant borough Core Strategy consultations should insufficient time be available for these to be brought to a full Authority meeting.

7. RECOMMENDATIONS

The Authority is recommended to:

- (i) Approve the draft response to The London Plan, Spatial Development Strategy for Greater London, Consultation draft replacement plan, October 2009 as enclosed at Appendix 1.
- (ii) Delegate authority to the Head of Waste Strategy and Contracts in consultation with the Chair and Vice Chairs, to submit a response to the revised borough waste apportionment figures consultation should insufficient time be available for this to be brought to a full Authority meeting.
- (iii) Delegate authority to the Head of Waste Strategy and Contracts in consultation with the Chair and Vice Chairs, to submit a response to relevant borough Core Strategy consultations should insufficient time be available for these to be brought to a full Authority meeting.

8. COMMENTS OF THE FINANCIAL ADVISER

The Financial Adviser has reviewed this paper and has no further comments to add.

9. COMMENTS OF THE LEGAL ADVISER

The Legal Adviser has reviewed this paper and has no further comments to add.

Local Government Act 1972 – Access to information

Documents and

Websites used:

The London Plan, Spatial Development Strategy for Greater London, Consultation draft replacement plan, Mayor of London, October 2009

Integrated Impact Assessment Full Report, Consultation draft replacement London Plan (Spatial Development Strategy for Greater London, Mayor of London, October 2009

The London Plan Spatial Development Strategy for Greater London Consolidated with Alterations since 2004, Mayor of London, February 2008

A new plan for London, Proposals for the Mayor's London Plan, Mayor of London, April 2009

Planning for a Better London, Mayor of London, July 2008

North London Joint Waste Strategy, February 2009

Waste Strategy 2007 for England, Defra

Rethinking Rubbish in London, The Mayor's Municipal Waste Management Strategy, Mayor of London, September 2003

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APPENDIX 1.

COMMENTS ON THE LONDON PLAN - CONSULTATION DRAFT REPLACEMENT PLAN

Boris Johnson
Mayor of London
(Replacement London Plan)
FREEPOST 15799
GLA City Hall
Post point 19B
The Queen's Walk
London
SE1 2BR

9th December 2009

Dear Mayor Johnson,

Public consultation on the Draft replacement London Plan

Thank you for providing us with the opportunity to respond to the consultation on the above. The North London Waste Authority is one of the six joint waste disposal authorities in England. Handling the municipal waste from the London boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest, our area spans three of the London Plan sub-regions and both inner and outer London boroughs.

We are responding within the context of having agreed a joint waste strategy with our constituent borough councils, including a reuse, recycling and composting target of 35% recycling and composting by 2010, 45% reuse, recycling and composting by 2015 and 50% by 2020 and all our boroughs having agreed to prepare a joint waste development plan document – the North London Waste Plan for which the public consultation on the Preferred Options has recently concluded.

We welcome the revision to the London Plan and in particular the increased focus upon climate change that is included within the draft Plan. We would also be keen to give oral evidence at the forthcoming Examination in Public on the revised Plan.

You may receive separate comments from our constituent borough councils, although officer-level liaison has taken place.

If you require clarification on any of the points raised, please do not hesitate to contact me.

Yours sincerely,

Cllr. Clyde Loakes
Chair, North London Waste Authority

Response from the North London Waste Authority to The London Plan, Consultation draft replacement plan, Mayor of London, October 2009

1. General Comments

- 1.1 Following on from the Authority's response to Planning for a Better London, the Authority would like to reiterate that it is broadly supportive of the approach outlined in the consultation and update to the London Plan.
- 1.2 The Authority has fully engaged in all previous reviews of the London Plan, including as noted above, responding to A New Plan for London, (April 2009), Planning for a Better London (July 2008), the two most recent Examinations in Public and also being involved in the consultation process associated with devising the waste apportionment modelling methodology incorporated into the current Plan.

Planning sub-regions

- 1.3 As noted in our previous responses, one of our concerns about the London Plan is the changing nature of the planning sub-regions and the uncertainty this potentially creates when planning sub-regions change. In relation to waste management, the Authority recognises that it is for boroughs to decide how they should best meet the waste apportionment targets currently included within the London Plan and that the borough level apportionment now allows for greater flexibility in terms of allocating waste to be managed to individual boroughs who can then come together in different groupings to meet the challenge of planning for waste.
- 1.4 In North London our boroughs have agreed to pool the targets within the North London Waste Authority (NLWA) area. However, with the consultation draft Plan now potentially moving the NLWA boroughs into three different sub-regions and with the fact that there are now three of the NLWA boroughs within the designated inner London area and four in the outer London area we have some concerns that this might lead to differing priorities and drivers being placed upon different parts of our area which could cause confusion.

2. Self sufficiency

- 2.1 The consultation draft London Plan sets increased targets for recycling and composting municipal waste. These targets go beyond those included within the current North London Joint Waste Strategy (NLJWS), which are as follows:

35% recycling and composting by 2010

45% recycling and composting by 2015

50% recycling and composting by 2020.
- 2.2 The Authority and borough partners' targets, which are outlined in the NLJWS are in line with the current national waste management strategy (Waste Strategy 2007, for England) and in line with the existing waste management strategy for the capital, (Rethinking Rubbish in London, GLA, September 2004) and are additionally included within the Authority's Outline

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Business Case supporting its application for PFI credits for waste management facilities from central government.

- 2.3 The Authority is concerned that a municipal recycling and composting rate of 60% by 2031 as outlined in the consultation draft London Plan, could be difficult to achieve without the introduction of additional measures from central government, be that incentives or penalties for recycling or not, and sufficient local authority finances in place to make these improvements happen.
- 2.4 The Authority and its constituent borough partners have currently reached a recycling and composting rate for household waste of 27.69% (2008/09) and are undertaking modeling to determine how to reach the 50% household recycling and composting rate set within the joint waste strategy. The Authority will continue to develop ambitious plans for reaching ever higher recycling and composting rates, as well as focusing attention on waste reduction. However, we would argue that it is for the capital's municipal waste strategy to set the targets for recycling and composting and for the London Plan to support the strategy document. We recognise that the latter is to be shortly amended and that it is possible that the municipal waste targets for the capital as contained within the London waste strategy could also increase. However, as the NLJWS must be in conformity with the latter there is a risk that the partners could face a requirement to increase the levels of recycling and composting of municipal waste in North London still further, which would have resources implications for all partners.
- 2.5 The change within the consultation draft London Plan for SRF production within London to be counted as waste being managed within London, is however a potentially very beneficial change for the Authority because it would assist the area in meeting self sufficiency targets and accordingly this change is supported.

Waste capacity

- 3.1 The explicit support for a range of waste technologies as outlined in the consultation draft London Plan potentially provides both greater flexibility and guidance for contractors bidding for the Authority's main procurement contract post 2014 than is included within the current London Plan. We are therefore pleased to see this wider range included.
- 3.2 Policy 5.17 of the consultation draft London Plan also outlines the Mayor of London's approach to ensuring sufficient capacity for managing waste within the city and specifically notes that 'developments that include a range of complementary waste facilities on a single site' will be supported as part of the Mayor of London's recognition of the need to increase waste processing capacity in the capital. The Authority is supportive of this approach.
- 3.3 It is unfortunate that the revised apportionment figures for North London were not produced at the time this response was prepared as they could potentially have an impact upon the Authority's plans and in particular the amount of land that the North London Waste Plan, the spatial strategy for

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north London, is likely to allocate for waste use, in line with the apportionment requirements.

Other waste streams

- 4.1 CE&D waste policies are not substantially altered compared to the current version of the London Plan and although the requirements for waste management plans will impact upon any new buildings of waste management facilities in the area, as these requirements are already included within national legislation, there are no significant additional implications for the Authority and accordingly we are not commenting further.
- 4.2 As there is no change proposed to the current policy in relation to hazardous waste within the London Plan, there is no need to make additional comment here. However, we would urge for the protection of existing hazardous waste sites from being lost and the strategic importance of the same to continue to be recognised.

Decentralised and renewable energy

- 5.1 The sections of the consultation draft London Plan relating to decentralised and renewable energy potentially provide opportunities for the Authority to maximise the benefits of waste in terms of energy and heat and as such are supported. What is missing in the London Plan, although we recognise that it may be addressed in the imminent Climate Change and Energy Strategy, is how many waste sites might be connected to demand, who funds the infrastructure associated with this, and when any demand might come on stream and its relationship to the delivery of waste facilities. We would urge that these issues are addressed at the next stage of the Plan's production in order to provide some context to the proposals.

Opportunity and Intensification Areas

- 6.1 Two of the opportunity and intensification areas identified within the draft consultation London Plan which are within the Authority's area refer to waste management, in particular the Brent Cross/Cricklewood area to the west and the Upper Lee Valley to the east.
- 6.2 The Upper Lee in particular offers the potential for a green enterprise zone recognising the regeneration opportunities from green industries, but this also requires that sufficient industrial land be protected from release for example for residential use and so that it is available for new green industries keen to locate there. The two approaches of either developing an area of resource management industries or new residential development that could act as a potential user of renewable energy and heat (from waste) may not therefore be directly compatible.
- 6.3 We would urge consideration of the opportunities that waste management can create whether that be for generating energy and heat for use in local homes or businesses as well as the opportunities for employment it may provide. Previously, waste management operations have been viewed as a poor neighbour and whilst we recognise that there are a number of challenges including changing perceptions and the need for ongoing

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communication we believe that with good facility design waste management operations can be integrated into the urban fabric, and the opportunities from the same realised as a result.

Examination in Public

- 7.1 We would also be keen to give oral evidence at the forthcoming Examination in Public on the revised Plan and look forward to the next stage of the consultation process.

Report Ends