

**Appendix 3 – Comments Received on the ‘SEA Draft’ North London  
Joint Waste Strategy**

**Changes proposed from consultation on 'SEA Draft NLJWS' to the produce a final NLJWS**

19th June 2008

Note - any changes proposed by Partner officers, rather than from consultees are not included on this sheet

Change Number	Chapter	Section	Change requested	By?	Recommended Action
1	Chapter 1	Aims and Objectives	Agree with the Aims & Objectives, but an EfW contract should not require a minimum tonnage that compromises the viability of future technologies.	Ashley Phillips	<u>No change</u> . Residual waste capacity will be selected through a technology neutral procurement, and be of tonnage capacity allowing for 50% recycling.
2		Aims and Objectives	Agree with the Aims & Objectives, but the importance of the proximity principle and sustainable transport are not properly reflected. Further elaboration provided elsewhere.	David Sargent - LondonWaste Ltd	<u>No change</u> . The first and second Aims require sustainable policies and minimal overall environmental impacts. Also Implementation Actions <b>7.C1</b> and <b>7.C2</b> support sustainable transport.
3		Aims and Objectives	Agree with the Aims & Objectives, but would like to see the proximity principle and sustainable transport properly reflected.	Paul Gavin - SITA	<u>No change</u> . The first and second Aims require sustainable policies and minimal overall environmental impacts. Also Implementation Actions <b>7.C1</b> and <b>7.C2</b> support sustainable transport.
4	Chapter 2	Implementation Action 2.B	The Strategy employs the Prime Minister's Strategy Unit recommended growth rate for municipal waste (3%/year until 2010/11 and 2.5% thereafter) and not that used in the London Plan (2%/year for household waste, 0% for non-household waste). London Plan data will form the basis of local development planning documents and the North London Waste Plan and should be used to inform the Joint Waste Strategy.	Sophie Easteal - GLA	<u>Change in part</u> . The London Plan figure had not been agreed at the time the Partners commissioned this work, and we proceeded on the basis that we were updating on previously agreed rates. However, we recognise that waste growth rates can change both up and down. An updated sensitivity analysis has therefore been carried out and is included in Chapter 2 showing the impact of a 2% per annum waste growth rate in line with London Plan projections and the accompanying text accordingly altered.
5	Chapter 3	Section 3.1 2. Regional Self Sufficiency	The references to regional self-sufficiency and apportionment are unclear in this section. The Mayor has apportioned specific amounts of waste to be managed in each London borough to achieve the London Plan regional self-sufficiency targets, not in addition to them.	Sophie Easteal - GLA	<u>Change</u> . Wording in this paragraph altered to clarify the position.
6	Chapter 3	Section 3.3	The Mayor continues to have the powers under the GLA Act 1999 which are outlined in this section, so the word 'had' should be changed to 'has'	Sophie Easteal - GLA	<u>Change</u> as suggested.
7	Chapter 3	Section 3.4	The reference to the London in Plan in section 3.4 should be to the London Plan (Consolidated with Alterations since 2004)	Sophie Easteal - GLA	<u>Change</u> as suggested.

Change Number	Chapter	Section	Change requested	By?	Recommended Action
8	Chapter 4	Section 4.0	For clarity and given you now have Implementation Action 6.B we would also prefer you to use the Mayor's waste hierarchy, given in Figure 25 of the MMWMS in place of that given in Chapter 4.	Sophie Easteal - GLA	<u>Change.</u> Accept that the figure used is outdated, but the Waste Strategy for England 2007 figure 1.3 is more recent than the Mayor of London's Municipal Waste Management Strategy so it has been used instead.
9	Chapter 4	Implementation Action 4. F2	For simplification, implementation actions 4.I1 and 4.F2 should be amalgamated	Sophie Easteal - GLA	<u>Change.</u> Implementation Action <b>4.F2</b> deleted and reference made in the accompanying text to section <b>4.2.1 (v)</b> which covers provision of recycling services to multiple occupancy premises
10	Chapter 4	Implementation Action 4.H1	Update Implementation Action 4.H1 to commit to providing kerbside services to a minimum of 95% of households on the basis of the definition of 'kerbside' used in BVPI 191	Sophie Easteal - GLA	<u>No change.</u> The term 'relevant households' already included in this Implementation Action can encompass GLA's concerns, and it is therefore unnecessary to change this action.
11		Implementation Action 4.H1	Merge this Implementation Action with 7.A1 for simplification	Sophie Easteal - GLA	<u>Change.</u> The two implementation actions are similar, but rather than merge them, Implementation Action <b>7A1</b> is changed to refer to Implementation Actions <b>4.H1</b> and <b>4.H2</b>
12	Chapter 4	Implementation Action 4.K1	To achieve Proposal 20 of the Mayor's Strategy, Implementation Action 4.K1 should be expanded to encourage the recycling of street litter and provision of on-street recycling bins.	Sophie Easteal - GLA	<u>Change.</u> Street litter added to Implementation Action 4.K2 thereby making a commitment to recycling and composting more of this material and by implication provision of bins to do so.
13	Chapter 4	Implementation Action 4.L2	Revision requested to make a commitment to exceeding recycling or composting levels in municipal waste of 35% by 2010 and 45% by 2015	Sophie Easteal - GLA	<u>Change.</u> Change Implementation Action <b>4.L2</b> to 'achieve 35%' from the previous 'achieve 40%' by 2010 to make the household element of the municipal waste agree with the suggestion. Note that policy <b>8.C1</b> is changed too, so that the non-household element of the municipal waste agrees with the suggestion too.
14	Chapter 4	Implementation Action 4.L2	Concern at change to 2010 recycling and composting target from 35% to 40%, and how targets will be apportioned between boroughs	Cllr Brian Haley - Haringey	<u>Change.</u> Change Implementation Action 4.L2 to 'achieve 35%' from the previous 'achieve 40%' by 2010. Agrees with item above.
15		Implementation Action 4.L2	Clarify whether the waste being described is 'municipal' or 'household'	Sophie Easteal - GLA	<u>No change.</u> Waste Strategy for England, 2007 clearly sets targets for reuse, recycling and composting of <i>household waste</i> .
16	Chapter 4	Section 4.2.2	There is a discrepancy between references to the Edmonton incinerator in terms of energy production and waste weight reduction between sections 2.4.2 and 4.2.2	Sophie Easteal - GLA	<u>Change.</u> The reference at <b>4.2.2</b> is amended to be in line with the reference at <b>2.4.2</b> .

Change Number	Chapter	Section	Change requested	By?	Recommended Action
17	Chapter 4	Section 4.2.2	Although the WRATE assessment of the five options does provide some indicative data it is not sufficiently robust enough to identify a preferred option. We recommend that you remove the preference for one of the scenarios to enable the JWS to be in line with the NLWA's intended procurement process. An example of where the JWS currently takes this approach is the last paragraph of 4.2.2 starting 'further assessment of new and emerging technologies...'	Sophie Eastéal - GLA	<u>Change</u> as suggested.
18	Chapter 4	Section 4.2.2	Please delete the word 'generally' in this paragraph as follows: <i>In accordance with the waste hierarchy, waste recovery should generally only be undertaken for wastes remaining after waste prevention, recycling and composting have been maximised</i>	Sophie Eastéal, GLA	<u>No change</u> . Whilst the Strategy outlines how the Partners will move waste 'up' the waste hierarchy, the second paragraph of Chapter 4 notes "... that whilst recent studies..., have confirmed that the waste hierarchy remains a good general guide to the relative environmental benefits of different waste management options, the Waste Strategy for England 2007 also notes that there will be exceptions to this for particular materials and in particular circumstances. So, Waste Strategy for England 2007 recommends that the use of the waste hierarchy should also be informed by life-cycle thinking and the broader sustainable consumption and production agenda." It is important this flexibility is retained.
19		Section 4.2.2 (iv)	Please change the word 'suitable' wastes to all 'non-recyclable residual waste' so that the sentence would read '...the Partner Authorities are committed to LondonWaste Limited and the Edmonton Energy from Waste facility for all non-recyclable residual waste until December 2014'.	Sophie Eastéal - GLA	<u>Change in part</u> . The word 'suitable' needs to remain as some residual wastes are unsuitable for incineration, e.g. large bulky items; similarly some potentially recyclable wastes continue to go to the Edmonton energy from waste facility because they are mixed with the residual waste stream. However, the use of the word 'residual' has been added so that the sentence reads '...the Partner Authorities are committed to LondonWaste Limited and the Edmonton Energy from Waste facility for all suitable residual wastes until December 2014'.
20	Chapter 4	Section 4.3	This section appears to be referring to the impact that tonnage-based recycling targets has on the implementation of the waste prevention and reuse activities, however this is unclear.	Sophie Eastéal - GLA	<u>Change</u> . Delete the final sentence of section 4.3
21	Chapter 5	Batteries & Accumulators	Given the term of the strategy, the 2016 battery recycling target should be included in this section	Sophie Eastéal - GLA	<u>Change</u> . Reference to the 2016 target included in the first paragraph.

Change Number	Chapter	Section	Change requested	By?	Recommended Action
22	Chapter 6		The strategy (and modelling) assume that a new incinerator, as modelled in the Procurement Scenario would be located on the same site as the current facility. Should the land not be available after 2014 a new site may need to be found . This should have been made clear in the public consultation.	Sophie Eastal - GLA	<u>No change.</u> We refer you to section 4.3.2 of the SEA Environmental Report 'limitations of the assessment' and the last paragraph of section 4.3.3
23	Chapter 6		Delete the paragraph starting 'so it is the procurement scenario...'	London Mayor - GLA (by Richard Blakeway) separate email from Sophie Eastal	<u>Change</u> as suggested, but it is consequently necessary to also change the first two paragraphs on the following page.
24	Chapter 6	Implementation Action 6B	Clarify whether the waste being described is 'municipal' or 'household'	Sophie Eastal - GLA	<u>Change.</u> Clarified to refer to household waste, in accordance with 'Waste Strategy for England 2007' targets.
25		Implementation Action 6B	Revision requested to make a commitment to exceeding recycling or composting levels in municipal waste of 35% by 2010 and 45% by 2015	Sophie Eastal - GLA	<u>Change in part.</u> This implementation action has recently been agreed with the GLA, but the words 'household waste' are inserted for clarification as follows to Implementation Action <b>6.B</b> : .."involve achievement of 50% <i>household waste</i> recycling and composting rates by 2020"
26		Implementation Action 6B	Yes. With comments, namely concern that 6B would block the use of an existing local facility (the LWL energy-from-waste incinerator at Edmonton).	David Sargent - LondonWaste Ltd	<u>No change.</u> The NLJWS cannot assume the continuation of a current contractor, and Implementation Action 6.B does not necessarily exclude the use of the existing facility.
27		Implementation Action 6B	Agree with the changes made to the Implementation Actions with comment made on 1 action, only. Concern that 6B would block the use of an existing local facility (the LWL energy-from-waste incinerator at Edmonton).	Paul Gavin, SITA	<u>No change.</u> The NLJWS cannot assume the continuation of a current contractor, and Implementation Action 6.B does not necessarily exclude the use of the existing facility.
28		Implementation Action 6B	General concern to see carbon efficiency/CHP; achievement of WSE2007 targets for household waste recycling, household residual waste reduction and municipal waste recovery; consideration of anaerobic digestion; agreed general conformity with the London Mayor's strategy and London Plan.	John Burns, DEFRA (WIDP)	<u>No change.</u> The NLJWS incorporates the above issues and will be in general conformity with the London Mayor.

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29	Chapter 7		Delete the paragraph (under the section 'waste disposal implications') starting ' the number, type and capacity....'	London Mayor - GLA (by Richard Blakeway) separate email from Sophie Easteal	<u>Change</u> as suggested.
30	Chapter 7		Delete the table which follows the text above	London Mayor - GLA (by Richard Blakeway) separate email from Sophie Easteal	<u>Change</u> as suggested.
31	Chapter 7		Insert the new paragraph given below in place of the deleted text and table ' It is the Partners' preferred strategy that the implementation of the residual waste treatment element of the North London Joint Waste Strategy will be determined through a technology neutral procurement process, evaluating each proposal on its own merit, in order to deliver against the Strategy's objectives and implementation actions, particularly actions 4.M2 and 6B.'	London Mayor - GLA (by Richard Blakeway) separate email from Sophie Easteal	<u>Change</u> as suggested.
32	Chapter 7		Delete the paragraph starting 'it should be noted...' as this now won't make any sense on its own.	London Mayor - GLA (by Richard Blakeway) separate email from Sophie Easteal	<u>Change</u> as suggested.
33	Chapter 7	Implementation Action 7A1	Update Implementation Action 4.H1 to commit to providing kerbside services to a minimum of 95% of households on the basis of the definition of 'kerbside' used in BVPI 191	Sophie Easteal, GLA	<u>No change</u> . The term 'relevant households' already included in this Implementation Action can encompass GLA's concerns, and it is therefore unnecessary to change this action.
34		Implementation Action 7.A1	Merge this Implementation Action with 4.H1 for simplification	Sophie Easteal, GLA	<u>Change</u> . The two implementation actions are similar, but rather than merge them Implementation Action <b>7A1</b> is changed to refer to Implementation Action <b>4.H1</b> and <b>4.H2</b>

Change Number	Chapter	Section	Change requested	By?	Recommended Action
35	Chapters 6 & 7	Preferred scenario	Progress with the procurement scenario.	Ashley Phillips	<u>No change</u> . Note however in response to GLA comments the NLJWS will not identify a preferred scenario, but will instead prefer a technology neutral procurement as the major means of implementation.
36		Preferred scenario	Comments summarised as: There is little to choose between the main contenders in the short-term. Should consider a short term-extension of existing contracts to allow long-term transport costs to be estimated. The Borough solution has much to commend it, not least because it introduces least changes in the short term.	Alan Robinson	<u>No change</u> . Contract timing will be a matter for subsequent strategy implementation via a major procurement exercise. The Borough-led solution requires more new facilities than others.
37		Preferred scenario	B. Go back to the partnership scenario.	Linda Nathan	<u>No change</u> . Note however in response to GLA comments the NLJWS will not identify a preferred scenario, but will instead prefer a technology neutral procurement as the major means of implementation.
38		Preferred scenario	Progress with the procurement scenario.	Jill Chadwick	<u>No change</u> . Note however in response to GLA comments the NLJWS will not identify a preferred scenario, but will instead prefer a technology neutral procurement as the major means of implementation.
39		Preferred scenario	The strategy should not recommend a scenario so that it is in line with the procurement process and the Mayor of London's Municipal Waste Management Strategy.	London Mayor - GLA (by Richard Blakeway)	<u>Change</u> as suggested.
40		Preferred scenario	Comments summarised as: It is very difficult to answer this question as it is difficult to understand the scenarios and the differences between them and why each scenario sends a different amount of waste to landfill. Does the cost of each scenario cover the complete cost of waste collection and treatment? The Borough scenario costs less £/tonne than the Procurement scenario.	Simonetta Tunesi - UCL	<u>No change</u> . Questions of clarification received too late to inform a full response.

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41		Preferred scenario	The scenarios do not sufficiently consider that the existing Energy from Waste plant will be operational beyond 2014. Some scenarios assume that there will be reduced or no EfW although it is feasible that the EfW will remain operational thereafter and take waste from other authorities and commercial customers. The Strategy does not give due consideration to the impact if the existing EfW continues to operate. It may be that the planning process for new facilities is affected by the continued operation of the existing plant. The Strategy and its implementation actions should consider this potential outcome. Partners should consider the hybrid "smart PFI" scenario in addition to those being considered already.	David Sargent - LondonWaste Ltd	<u>No change.</u> The NLJWS cannot assume the continuation of a current contractor, and Implementation Action 6.B does not necessarily exclude the use of the existing facility.
42		Preferred scenario	All of the scenarios assume that the Edmonton EfW will be replaced at the beginning of 2015. The potential for its continued use should be taken into account in conjunction with each scenario. There may be planning implications if the existing EfW continues to operate but does not take the waste from North London.	Paul Gavin - SITA	<u>No change.</u> The NLJWS cannot assume the continuation of a current contractor, and Implementation Action 6.B does not necessarily exclude the use of the existing facility.
43		Preferred scenario	The procurement scenario (option 5) appears to come out top on environmental grounds. However Option 2 is a close second but is better on economic grounds. Overall even though Option 5 is more expensive it is favoured on environmental grounds.	Keith Bates - EA	<u>No change.</u> Note however in response to GLA comments the NLJWS will not identify a preferred scenario, but will instead prefer a technology neutral procurement as the major means of implementation.
44		Preferred scenario	Questions about Habitats Assessment, relative scores on water quality and biodiversity, number of additional facilities, and Action 7.C2.	Claire Martin - Lee Valley Park	<u>No change.</u> Questions of clarification received too late to inform a full response.
45	Chapter 8	Implementation Action 8.C2	This Implementation Action should be strengthened by being linked to the London Plan policy 4A.21 regarding regional self sufficiency targets	Sophie Eastal, GLA	<u>No change.</u> The North London Waste Plan will have to be in compliance with the London Plan so change is unnecessary.
46	Chapter 8	Commercial waste	Partners should lobby government to include commercial waste in recycling targets	Cllr Brian Haley - Haringey	<u>No change.</u> As a specific action, this can be done without changing the Strategy.

Change Number	Chapter	Section	Change requested	By?	Recommended Action
47	Chapter 8	Implementation Action 8.F2	The commitment to buying recycled is supported in Implementation Action 8.F2, but the LB of Haringey should be encouraged to re-sign the Mayor of London's Green Procurement Code as they undertake purchasing for the NLWA	Sophie Eastal, GLA	<u>No change.</u> Comment noted.
48	Chapter 8	Implementation Action 8.G2	Implementation Action 8.G2 should be updated to reflect the actual review periods proposed for the JWS and SEA Environmental Report	Sophie Eastal, GLA	<u>Change.</u> Add following words to Implementation Action <b>8.G2</b> : <i>"Later reviews will coincide with contract review periods set within any new contracts."</i>
49	General Comments	Any Other Implementation Actions or Policies Suggested?	A complete zero waste strategy. Large multiple kerbside collection of all recyclable dry materials in a large wheelie bin and very small wheelie bins for non-recyclables, and a mass information campaign to get people to fully implement a food waste collection scheme with a carrot and stick incentive programme.	Ashley Phillips	<u>No change.</u> Local authorities cannot eliminate waste. The achievement of 50% recycling and composting rates will require services similar or equivalent to those requested.
50		Any Other Implementation Actions or Policies Suggested?	Bring forward the date for recycling for cardboard and plastic to July not October. Could the waste not be "steam-rollered" flat in some way to squash it and therefore take up less space?	Miss Sylvia Oliff	<u>No change.</u> The achievement of 50% recycling and composting rates will require services similar or equivalent to those requested.
51		Any Other Implementation Actions or Policies Suggested?	Comments summarised as: The highest levels of recycling can be achieved by sorting waste at the depot rather than by residents or at the kerbside. Unmanned "bring stations" would encourage "fly-dumping" by non-residents especially if it is intended to collect a wide range of recyclables.	Alan Robinson	<u>No change.</u> A mix of collection services is included in the NLJWS. All services will be properly managed. Information and enforcement campaigns will be implemented.
52		Any Other Implementation Actions or Policies Suggested?	I would like Barnet Council to recycle plastics and oil. We need more recycling centres in Barnet and more facilities for recycling green waste.	Linda Nathan	<u>No change.</u> The achievement of 50% recycling and composting rates will require services similar or equivalent to those requested.
53		Any Other Implementation Actions or Policies Suggested?	Build a MRF as soon as possible to serve the seven North London Boroughs and share the cost evenly between the Boroughs. Government should tax companies that produce food and packaging. Retailers should contribute towards the cost of a MRF, bulking facility, composting plant(s) or anaerobic digestion plant.	C. M. Albani	<u>No change.</u> The actions requested are already included.

Change Number	Chapter	Section	Change requested	By?	Recommended Action
54		Any Other Implementation Actions or Policies Suggested?	Increased kerbside collection including plastic and cardboard. Work with business to reduce packaging.	Jill Chadwick	<u>No change</u> . The actions requested are already included.
55		Any Other Implementation Actions or Policies Suggested?	We would suggest the inclusion of Food Waste Disposers in the Strategy. Disposers support many of the Objectives.	Douglas Herbison - AMDEA	<u>No change</u> . The NLJWS is not so specific as to encourage this company's type of product.
56		Any Other Implementation Actions or Policies Suggested?	Do not give preference for any scenario; make procurement process technology neutral	London Mayor - GLA (by Richard Blakeway)	<u>Change</u> as suggested.
57		Any Other Implementation Actions or Policies Suggested?	Comments summarised as: The size and number of documents should be reduced and the data should be presented in a form that is easier to interpret. Data on waste arising and composition should be provided early in the document to help readers understand and evaluate the strategy. The difference between household waste and commercial waste and the associated targets should be highlighted.	Simonetta Tunesi - University College London (UCL)	<u>No change</u> . Comments to be borne in mind for future consultations and information campaigns.
58		Any Other Implementation Actions or Policies Suggested?	Suggest inclusion of objectives to minimise transport of waste and resources when siting facilities; and minimise the impact of road transport emissions by utilising local water transport when possible. Partners should not underestimate the difficulty and timescales involved in delivering the strategy. Flexibility should be built into the system to allow for delays in the provision of new facilities.	David Sargent - LondonWaste Ltd.	<u>No change</u> . Implementation Actions <b>7.C1</b> and <b>7.C2</b> support sustainable transport. The need for flexibility during the implementation of the NLJWS is noted.
59		Any Other Implementation Actions or Policies Suggested?	Suggest amending the fifth objective to read "To transport and manage municipal wastes in the most environmentally benign and economically efficient ways possible through the provision and coordination of appropriate wastes management facilities and services <u>located in the North London Waste Authority area wherever possible in accordance with the Proximity Principle.</u> "	Paul Gavin - SITA	<u>No change</u> . Implementation Actions <b>7.C1</b> and <b>7.C2</b> support sustainable transport. Chapter 3, section 3.1 includes London Plan requirements for regional self-sufficiency.

Change Number	Chapter	Section	Change requested	By?	Recommended Action
60		Any Other Implementation Actions or Policies Suggested?	Eager to ensure compatibility with Lee Valley 'Park Plan' that is currently under review. Use of canals for waste transportation to be considered in detail with increased recreational use.	Claire Martin - Lee Valley Park	<u>No change</u> . These will be matters to consider during the implementation of the NLJWS.
61		Any Other Implementation Actions or Policies Suggested?	New facilities should be established with full and comprehensive consultation processes so that the best interests of all residents and businesses are adequately represented	Cllr Brian Haley - Haringey	<u>No change</u> . These will be matters to consider during the implementation of the NLJWS.
62	Glossary		Definitions of 'new and emerging technologies' and 'anaerobic digestion' should be included in the glossary	Sophie Easteal - GLA	<u>Change</u> . Definitions added.
63	Glossary		We would also prefer for you to use the Mayor's waste hierarchy in Chapter 4 (see above) You could give a fuller definition of recovery/energy recovery in the Strategy's glossary, which is in line with text in 4.2.2	Sophie Easteal - GLA	<u>Change</u> . Definitions added.
Late Response	General Comment		Many of the comments made in response to the SEA Environmental Report are relevant to the NLJWS. It addition wish to reiterate comments made in the letter dated 11th October 2007 regarding the fact that the historic environment is a finite and non-renewable resource in its own right. Unclear whether many of the points raised at the Scoping stage have been sufficiently incorporated	Graham Saunders - English Heritage	-

Note: There was 1 additional respondent who wanted to respond but felt unable to comment due to the complexity of the documents. This point is noted for future consultations.

## **Appendix 4 – Comments Received on the SEA Environmental Report**

**Changes proposed to the produce a final SEA Environmental Report**

Note – any changes proposed by officers, rather than from consultees are included at the bottom of this sheet

Change Number	Chapter	Section	Change requested	By?	Recommended Action
Late response	Chapter 3	3.4 Environmental Issues & Problems, Table 3.1	Reference to be made to the area's diverse archaeology. Suggest rephrase the statement relating to the Built and Historic Environment to 'the area has a diverse range and number of heritage assets such as historic parks and gardens, listed buildings, conservation areas and archaeology, within the wider historic environment'.	Graham Saunders - English Heritage	ENTEC to comment
Late response	Chapter 3	Table 3.4 - O13	Suggest change to the SEA Appraisal Criteria question to read 'Will the NLJWS sustain and enhance heritage assets, their setting and the wider historic environment?' When abbreviating SEA Objective O13 it should state Built and Historic Environment	Graham Saunders - English Heritage	No change as appraisal already carried out against the existing criteria
1	Chapter 4	Table 4.2 Comments on the ratings given to each scenario	Procurement scenario looks the most efficient but it requires a massive EfW and I don't agree with needing to create waste to keep the viability of the service in place.	Ashley Phillips	No change. Note however in response to GLA comments the SEA will not identify a preferred scenario, but will instead prefer a technology neutral residual waste facility procurement of a tonnage capacity allowing for 50% recycling.
2			The SEA should not recommend a scenario so that it is in line with the procurement process.	London Mayor - GLA (by Richard Blakeway)	Change as suggested.
3			Comments summarised as: Not possible to fully evaluate the SEA without reference to specific sites. Using coal/oil as a comparative base line for measuring the emissions from an incinerator does not represent any benefit felt by the affected communities. Using WRATE as the only modelling tool may be inappropriate. Emissions to air need to be better modelled. The SEA should describe a modelling plan to be used after sites have been selected.	Simonetta Tunesi - UCL	Change displaced energy mix as suggested.
4			The system is essentially a crude measurement and is subject to personal views.	David Sargent - LWL	No change.

Change Number	Chapter	Section	Change requested	By?	Recommended Action
Late response	Chapter 4	Text summary of table 4.2	Concerned that the text summarising the scoring of the different scenarios in table 4.2 suggests that 'overall the options score positively for the majority of the SEA objectives'. We question this conclusion given the number of '?' in the table. Also concerned that only '?'s are attached when the options are considered against the Built and Historic Environment Objective. Suggest that even at this stage there must be some awareness of potential sites and types of technologies expected to be used against which options could have been scored against this objective	Graham Saunders - English Heritage	No change. As the strategy has been changed to be technology neutral and sites for facilities are unknown at this stage it is difficult to score anything other than '?'
5	Chapter 4	Section 4.4	Delete reference to a preferred option and leave the text that states 'no technology choices have been fixed...'	Sophie Easteal - GLA	Change as suggested.
6	Chapter 6	Table 6.1	An indicator for sustainable transport should be considered.	David Sargent - LWL	No change. Implementation Actions 7.C1 and 7.C2 support sustainable transport. Chapter 3, section 3.1 includes London Plan requirements for regional self-sufficiency.
7		Table 6.1	The indicator 07 should be amended to "Tonne miles of waste that are transported by road, rail and water." Aside from this the list of indicators seems comprehensive.	Paul Gavin - SITA	Change as suggested.
8		Table 6.1	Disappointing that no data is available for anticipated water usage in the proposed options under objective 06 Water Resources. Objective 08 could use other indicators such as flood risk e.g. the number of premises outside the flood plain, the number of incidents of flooding or premises adapted to deal with climate change. Objective 018 should be focused on all businesses and not just those specifically providing waste services.	Keith Bates - EA	ENTEC to comment
9		Table 6.1	Biodiversity may be more appropriately assessed at a regional (not just sub-regional) level. Waterway use may have impacts at some sites.	Claire Martin - Lee Valley Park	ENTEC to comment

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Late response		Table 6.1	The wording of the proposed NLJWS SEA Objective 13 should read 'to enhance and protect the existing built environment including heritage assets, their settings and the wider historic environment'. The possible indicator for the Built and Historic Environment should be amended to 'number of waste management facilities having any significant adverse impacts on heritage assets, their settings and the wider historic environment'	Graham Saunders - English Heritage	Change as suggested.
10	Chapter 7	Paragraph 6	Delete the reference to a preferred option being concluded from the SEA process	Sophie Easteal - GLA	Change
11	General Comments	Other comments and suggestions	What happens to food waste collected in Islington? Is NLWA aware of a company called Bioganix that make an anaerobic digestion plant?	Stephen Whitton	No change.
12			Comments summarised as: The plan relates to waste processing and makes little mention of the production of waste. The planning parameters in the NLJWS do not acknowledge the reduction in the amounts of waste packaging being generated nor the increase in the amounts of packaging that are being recycled.	Alan Robinson	No change. Waste reduction measures have been taken into account when setting growth rates for modelling purposes.
13			Comments summarised as: NLWA should consider a pilot plant utilising aerobic digesters for food and green waste with energy recovery to heat a swimming pool in the area.	Derek French	No change. This is a matter for the implementation of the NLJWS.
14			Please see our attached paper.	Douglas Herbison - AMDEA	No change. The SEA is not so specific as to encourage this company's type of product.
15			The SEA should not recommend a scenario so that it is in line with the procurement process (S4.4; S7, para 6; Non-tech summary s1.12). Dispaced power generation should be national mix, not all fossil fuel.	Sophie Easteal - GLA	Change as suggested.

Change Number	Chapter	Section	Change requested	By?	Recommended Action
16			The draft NLJWS appears to presume that the existing Energy from waste facility will not continue to be utilised. There is no reason why the partners could not continue to use the facility if it remains operational and compliant.	David Sargent - LWL	
17			The Strategy should not rule out the use of the existing Energy from Waste facility after 2014.	Paul Gavin - SITA	No Change. The SEA cannot assume the continuation of a current contractor, and Implementation Action 6.B does not necessarily exclude the use of the existing facility.
18			Pleased that previous comments have been accepted.	Keith Bates - EA	No Change
19	Appendices to the Environmental Report	Appendix C	The analysis in 1.3.1 states that WRATE assumes that the displaced power generation capacity is from coal-fired power stations. We understand this is an error and the WRATE in fact assumes the 'national mix'. Please update this reference.	Sophie Easteal - GLA	Change
20	Non-Technical Summary	Section 1.12	Deleted reference to a preferred option being concluded from the SEA process, again leaving the conclusion that 'no technology choices have been fixed.....'	Sophie Easteal - GLA	Change
	<b>Other Changes from Officers</b>	Section 1.5	Reference to table 5.1 in Appendix A is incorrect as there is no table 5.1		Change
		Section 3.3	Reference to Section 8 in Appendix A, second paragraph should be changed to Section 6		Change
		Section 3.6.1	Penultimate paragraph reference to table 4.4 should be table 3.3		Change
		Table 3.3	Needs to continue to be referred to as table 3.3 across all 4 pages		Change
		Table 4.1	Scenario table needs updating to SEA Consultation Draft version		Change