

North London Waste Authority

Strategic Environmental Assessment of the North London Joint Waste Strategy

SEA Post Adoption Statement

December 2008

Entec UK Limited

Report for

Barbara Herridge
Policy and Development Manager
North London Waste Authority
Lee Valley Technopark, Unit 169
Ashley Road
Tottenham
London
N17 9LN

Main Contributors

Michael Greslow
Tim Perkins

Issued by

.....
Michael Greslow

Approved by

.....
Tim Perkins

Entec UK Limited

Pacific House
Imperial Way
Reading RG2 0TD
England
Tel: +44 (0) 1183 775600
Fax: +44 (0) 1183 775610

Doc Reg No.

h:\projects\wm-220\20000 - 21999\20125 - nlwa framework\client
- c\002 reports to client\sea reports\post consultation
amendments\adoption statement final to nlwa dec 08.doc

North London Waste Authority

Strategic Environmental Assessment of the North London Joint Waste Strategy

SEA Post Adoption Statement

December 2008

Entec UK Limited



Certificate No. FS 13881



Certificate No. EMS 69090

In accordance with an environmentally responsible approach,
this document is printed on recycled paper produced from 100%
post-consumer waste, or on ECF (elemental chlorine free) paper

Copyright and Non-Disclosure Notice

The contents and layout of this report are subject to copyright owned by Entec (© Entec UK Limited 2008) save to the extent that copyright has been legally assigned by us to another party or is used by Entec under licence. To the extent that we own the copyright in this report, it may not be copied or used without our prior written agreement for any purpose other than the purpose indicated in this report.

The methodology (if any) contained in this report is provided to you in confidence and must not be disclosed or copied to third parties without the prior written agreement of Entec. Disclosure of that information may constitute an actionable breach of confidence or may otherwise prejudice our commercial interests. Any third party who obtains access to this report by any means will, in any event, be subject to the Third Party Disclaimer set out below.

Third Party Disclaimer

Any disclosure of this report to a third party is subject to this disclaimer. The report was prepared by Entec at the instruction of, and for use by, our client named on the front of the report. It does not in any way constitute advice to any third party who is able to access it by any means. Entec excludes to the fullest extent lawfully permitted all liability whatsoever for any loss or damage howsoever arising from reliance on the contents of this report. We do not however exclude our liability (if any) for personal injury or death resulting from our negligence, for fraud or any other matter in relation to which we cannot legally exclude liability.

Document Revisions

No.	Details	Date
V1	Draft to NLWA	08/09/08
V2	Final to NLWA	28/11/08

Executive Summary

Purpose of this Report

This purpose of this report is to set out the requires of the Strategic Environmental Assessment (SEA) post adoption statement in accordance with the requirements of the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations 2004.

The statement has been prepared in accordance with government guidance.¹ The report includes the following information.

- How environmental considerations have been integrated into the Plan;
- How the environmental report has influenced the North London Joint Waste Strategy;
- How recommendations from the SEA report have been taken into account in the finalised NLJWS;
- The reasons for choosing the strategy in light of other alternatives;
- How consultation responses to the SEA have been addressed;
- How the environmental, social and economic effects of the NLJWS will be monitored.

¹ ODPM (2005) A practical guide to the Strategic Environmental Assessment Directive

Contents

Purpose of this Report	i
1. Introduction	1
1.1 Background	1
1.2 The Strategic Environmental Assessment	1
2. How Environmental Considerations Have Been Integrated into the NLJWS	3
3. How the Environmental Report Has Influenced the NLJWS	5
3.1.1 Scoping Stage	5
3.1.2 Options Development	5
3.1.3 How the SEA Has Influenced the NLJWS as Adopted?	6
3.1.4 Consultation	7
3.1.5 Revisions Post-Consultation	10
3.1.6 Adoption	10
3.2 Monitoring	10
Table 3.1 Amendments to Policy within Draft NLJWS arising from SEA Recommendations.	7
Table 3.2 Summary of Key Comments Relevant to the SEA	8
Figure 1.1 Summary of SEA process	2

1. Introduction

1.1 Background

The North London Waste Authority has commissioned Entec to undertake a Strategic Environmental Assessment (SEA) in relation to the development of the North London Joint Waste Strategy (NLJWS).

1.2 The Strategic Environmental Assessment

The process of Strategic Environmental Assessment (SEA) was introduced through European Directive number 2001/42/EC in 2001.

The SEA aims to evaluate the likely environmental effects of strategic level plans and make recommendations for minimising negative effects and enhancing positive effects. SEA is therefore a key tool for integrating environmental considerations into plan making with the view to promoting sustainable development.

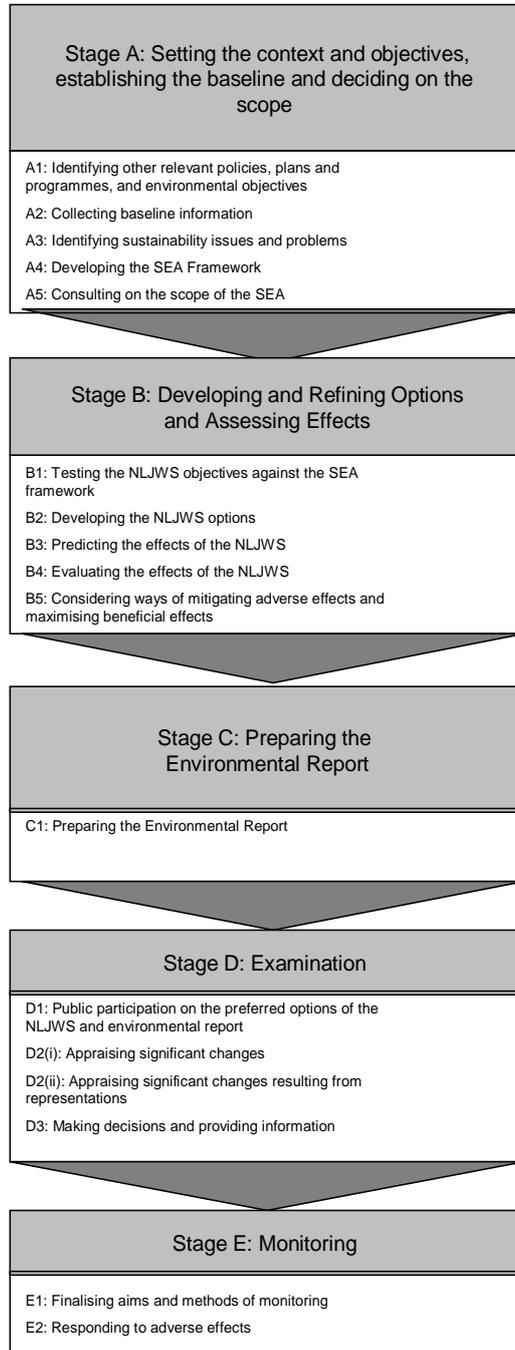
In line with guidance provided by the ODPM² and DEFRA³, the North London Waste Authority has undertaken a SEA of the North London Joint Waste Strategy.

The SEA must be an integral part of producing the strategy being appraised. As such, it follows five stages that are designed to link the strategy development process, outlined in Figure 1.1.

² ODPM (2005) A Practical Guide to the Strategic Environmental Assessment Directive

³ DEFRA (2005) Guidance on Municipal Waste Strategies

Figure 1.1 Summary of SEA process



2. How Environmental Considerations Have Been Integrated into the NLJWS

The final Environmental Report and SEA of the draft NLJWS sets out baseline information to help identify the environmental, economic and social issues affecting the area. This includes key facts about the area and implications for the future. This has provided the context for the NLJWS which is essentially about reducing the amount of waste going to landfill through improved waste reduction, re-use, recycling, recovery and treatment and delivering new facilities in a way that enables positive environmental, social and economic effects wherever possible.

By examining the requirements of the plans and policies which influence the NLJWS and the baseline data, the key environmental, social and economic issues were identified. These were used to develop a set of SEA objectives against which the NLJWS could be tested.

The SEA objectives were tested against the objectives of the draft NLJWS and were shown to be compatible. This confirmed that key environmental considerations such as the need to reduce the amount of waste produced, divert waste from landfill, mitigate climate change, protecting the environmental assets, ensuring waste services are provided equitably and accessible to the community were central to the NLJWS.

These principles then underpin the objectives and Implementation Actions within the NLJWS. Chapter 4 includes a series of actions which reflects the waste hierarchy emphasising measures to reduce and re-use waste, followed by composting and recycling services including door to door collection, re-use and recycling centres and new composting and recycling facilities and non-household services. Proposals for recovery are then dealt with a final action to seek to minimise the amount of landfill. These measures combine to address the key environmental considerations for the strategy as set out above. This chapter also includes a section explaining how the environmental impacts of providing new facilities will be addressed.

Chapter 5 explains measures to improve the management of other waste streams including bulky and hazardous wastes, commercial and construction wastes. Again the actions address improvements in terms of re-use, recycling and recovery whilst also address specific environmental impacts of the services. Chapter 6 covers in detail the process of appraising different options for the overall strategy for managing waste including residual treatment. Environmental considerations have been incorporated through the application of the SEA process as described below and by using waste flow modelling and WRATE life cycle analysis to take account of relevant environmental factors. The actions for implementation of the strategy in Chapter 7 deal with the delivery of new facilities to meet the NLJWS targets taking account of environmental considerations such as reducing the road transport of waste. Finally Chapter 9 deals with working in partnership to deliver the NLJWS and the environmental objectives set out within it.

The SEA process has allowed the options/actions set out in the NLJWS to be appraised to ensure that environmental considerations have been taken into account and amendments made where necessary. More detail is provided on this in the next section.

3. How the Environmental Report Has Influenced the NLJWS

The SEA has contributed to the development of the strategy by providing an assessment of the environmental, economic and social effects of the Authority's strategy options and actions as they have developed.

3.1.1 Scoping Stage

The process began with scoping work on the SEA was carried out in August 2007, which involved the collection of baseline data on environmental, economic and social conditions in all seven of the North London Boroughs. It also included a review of all relevant plans, policies and programmes at national, regional and local level to set the policy context within which the North London Joint Waste Strategy (NLJWS) will sit and in particular to identify environmental, economic and social policy objectives with which it must comply or which it will contribute towards achieving.

Arising from the policy review and analysis of the baseline data, a number of appraisal objectives and criteria were drawn up against which the strategy was assessed to understand the likely effects of the strategy in respect of the key issues within the area.

Consultation was undertaken on the Scoping Report between 10th September 2007 and 15th October 2007 with the statutory consultees⁴ and the Greater London Authority (GLA). A copy of the scoping report was also made available for public comment, with hard copies of the report being made available in borough libraries and a downloadable version on the NLWA website. The report set out information on the baseline data collected, the policy review, the appraisal objectives and criteria and the approach to developing options.

A considerable number of comments were received which were incorporated where appropriate into a revised Scoping Report. A summary of the comments received and the outcome of their consideration was reported to a North London Waste Authority meeting on 12th December 2007. The Revised SEA Scoping Report was attached as an Appendix within the Environmental Report.

3.1.2 Options Development

In parallel with consultation on the Scoping Report, work was undertaken to develop the options for the NLJWS. In developing the strategic waste management options, for the draft NLJWS the North London partner authorities used an options appraisal tool developed by the North London Waste Authority to assess which options to model. Five options were chosen to be modelled and assessed.

⁴ English Heritage, Natural England, Environment Agency

3.1.3 How the SEA Has Influenced the NLJWS as Adopted?

The SEA undertook an appraisal of the draft NLJWS and options in December 2007 and the results of the assessment of the policies and options were set out in a draft Environmental Report which was subject to consultation with the 7 North London Boroughs between March and May 2008. The environmental report was approved by each of the partner authorities to the NLJWS prior to its publication. A public consultation was then carried between 6th May and 17th June 2008 along with the draft revised NLJWS.

In order to evaluate the likely effects of implementing the draft NLJWS, the policies and options within the draft were assessed against a framework of SEA objectives. The appraisal of options was informed by quantitative modelling and where quantification was not possible a qualitative assessment was carried out. The results of the appraisal were recorded in a matrix which was included within the Environmental Report.

The NLJWS explains how the four strategic alternatives or options were originally produced for the draft NLJWS published in 2004. The options were originally assessed using a technique called Best Practicable Environmental Option (BPEO). Since the original assessment BPEO has been replaced by SEA as the basis for decision making on waste management options. The SEA has taken account of new issues including the need to update the options and to include a fifth option which reflects the NLWA's procurement strategy.

The conclusion of the options appraisal was that Option 5, the procurement scenario performed best against the range of environmental, social and economic effects. This Option performed very well against the environmental objectives and appraisal criteria, considered through WRATE modelling in terms of positive effects on air and water quality, greenhouse gas emissions, human health and depletion of resources. It also performed well in terms of efficient use of land. In terms of performance against the waste recycling and recovery objective option 5 also performed very well. The reference project assessed as part of this scenario was based on provision of an Energy from Waste facility. The Partner Authorities recognise that Energy from Waste incineration, which is included in this scenario, offers the only energy recovery treatment technology that is currently proven at the scale, cost and efficiency necessary for delivery of the Procurement Scenario. However it was also recognised that this may change before any final procurement decisions are taken so at this stage, no technology choices have been fixed. The options appraisal also concluded that consideration would also need to be given to the Mayor of London's preference for new and emerging waste technologies when making final technology choices in relation to residual waste treatment.

The BPEO assessment undertaken for the Mayor's draft NLJWS helped to inform the development of actions for the strategy and including consideration of environmental issues. The actions themselves were not however subject to an environmental assessment process, at the time. As a result of the need to comply with the requirements of the SEA Directive an assessment of the actions was undertaken.

The outcome of the assessment of actions which is summarised above has indicated that the implementation actions set out in the Mayor's Draft NLJWS are broadly compatible with the SEA objectives. In a number of areas there were considered to be uncertain effects notably in relation to objectives relating to sustainable design, efficient use of land and equality. There was some uncertainty regarding environmental effects, resulting from uncertainty as to the location of new facilities. As a result of the broadly positive outcome of the assessment of the Mayor's Draft NLJWS it was not recommended that any of the policies or 'implementation actions' within the strategy should be changed as a result of the assessment.

During the preparation of the NLJWS a number of actions were revised and a further appraisal was undertaken of these.

A series of recommendations were made for amendments to the NLJWS and these were incorporated into the revised NLJWS. They are summarised in Table 2.1 below.

Table 3.1 Amendments to Policy within Draft NLJWS arising from SEA Recommendations.

Topic	SEA Recommendation	NLJWS Change
Delivery of new composting and recycling facilities	Amend strategy actions/text to provide clear reference as to how environmental impacts of projects will be dealt with. This could include for example referencing the need for EIA for projects or providing a clear commitment to minimise the environmental impacts of introducing new services. Outline links to NLWP site selection process.	Section 4.2.4 of the NLJWS was amended to take account of these recommendations.
Sustainable design and construction	There is potential to improve the performance of the strategy against this objective by providing a clearer commitment to achieving high standards of sustainable design and construction when commissioning new facilities e.g. use of BREEAM standards.	Section 4.2.4 of the NLJWS was amended to take account of these recommendations.
Efficient use of land	Although mentioned in the strategy the actions could make a clearer commitment to the use of previously developed land for new treatment facilities and for the co-location of services and facilities on existing waste sites where appropriate.	Section 4.2.4 of the NLJWS was amended to take account of these recommendations.
Equalities	The strategy actions/text could explain more clearly how the strategy will ensure that the needs of the more deprived and hard to reach groups within the community will be addressed.	Section 4.2.1 and 4.2.4 of the NLJWS were amended to take account of these recommendations. (Further changes have been made as a result of the Equalities Impact Assessment)

3.1.4 Consultation

The Environmental Report was issued for public consultation alongside the draft revised NLJWS from 6th May to 17th June 2008 to inform consultees of the likely significant effects of implementing the strategy and provide an opportunity for comment. The purpose was to enable consultees to better understand its implications for achieving sustainable waste management and how the strategy could be improved.

The North London Waste Authority and its partner boroughs are required to take account of the responses from consultees and the information provided in the Environmental Report before the final decision is taken to adopt NLJWS.

Comments on the Environmental Report were received from 13 individuals or organisations. A summary of the key comments and the responses to those comments is given in Table 2.2 below. Where comments related to minor changes or to matters more related to the NLJWS rather than the SEA, these have not been included here. A full list of comments received is however available in Appendix 3 and Appendix 4 to the report entitled 'Strategic Environmental

Assessment and Adoption of the North London Joint Waste Strategy', presented to the North London Waste Authority meeting on 25th June 2008.

Table 3.2 Summary of Key Comments Relevant to the SEA

Summary of Comment	Organisation/Respondent	Response to Comment
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 that the NLJWS and 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.
The SEA should not recommend a preferred scenario. The technology choice should not be fixed, as is the case with the procurement process	Greater London Assembly	The NLJWS and 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.
Not possible to fully evaluate the SEA without reference to specific sites.	Simonetta Tunesi - UCL	It is not the role of the NLJWS to allocate sites as this is undertaken through the planning system and the North London Waste Plan (NLWP) which will be subject to Sustainability Appraisal separately.
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.	Simonetta Tunesi - UCL	Error in report drafting now corrected.
Using WRATE as the only modelling tool may be inappropriate.	Simonetta Tunesi - UCL	WRATE is currently the life cycle assessment tool which is recognised by Defra and the Environment Agency as being appropriate to apply to waste management decisions.
Emissions to air need to be better modelled.	Simonetta Tunesi - UCL	WRATE is currently the life cycle assessment tool which is recognised by Defra and the Environment Agency as being appropriate to apply to waste management decisions.
The SEA should describe a modelling plan to be used after sites have been selected.	Simonetta Tunesi - UCL	The requirement for and scope of any environmental impact assessments of individual sites/waste facilities cannot be judged at this stage as sites and facility types are not yet known.
The system is essentially a crude measurement and is subject to personal views.	London Waste Limited	No change. The SEA has been carried out in accordance with relevant legislation and guidance. It is considered to be a robust process which combines quantitative and qualitative assessment and is subject to consultation allowing for comments and alterations to be made where appropriate.
An indicator for sustainable transport should be considered.	London Waste Limited	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.

Table 3.2 (continued) Summary of Key Comments Relevant to the SEA

Summary of Comment	Organisation/Respondent	Response to comment
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.	SITA	Change as suggested
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.	Environment Agency	Water usage data for different technologies was not included within the assessment although it is recognised that water consumption will vary according to the type/size of plant developed. This point is noted for future consideration Add flood risk indicators as suggested. Point regarding objective 18 is noted, however no change considered necessary.
Biodiversity may be more appropriately assessed at a regional (not just sub-regional) level. Waterway use may have impacts at some sites.	Lee Valley Park	No change. In the context of the NLJWS the SEA process has to consider the environmental characteristics of the areas likely to be affected and any likely significant effects. This includes effects at different geographical scales, indeed the SEA does consider effects outside of the NLWA area where relevant. The SEA provides the opportunity to consider regional effects if relevant. Comment regarding waterways is noted and appraisal amended to reflect this although effects would be uncertain at this stage as specific details of transport are not known.
The draft NLJWS should not rule out continued use of the existing Energy from waste facility if it remains operational and compliant.	London Waste Limited 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.
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.		Reference updated
Reference needs to be made to the areas diverse archaeology as a strength with the challenge of positive planning and management to ensure sensible solutions. Rephrase statement relating to built environment in Table 3.1	English Heritage	Agree. Change made to relevant section of Environmental Report
Amend SEA Objective 13 and appraisal criteria to better reflect protecting and enhancing the built environment including heritage assets, their settings and the wider environment.	English Heritage	Appraisal criteria changed. No change required to appraisal matrices as location of facilities and therefore effects on historic environment is not known at this stage.

Table 3.2 (continued) Summary of Key Comments Relevant to the SEA

Summary of Comment	Organisation/Respondent	Response to comment
Concern that there are too many uncertain scores within the appraisal in respect of impacts on the Built and Historic Environment objective. There must be an awareness of the potential sites and types of technologies expected to be used. A clear methodology should be developed of site selection and use of technology that incorporates and tests the impact on the built and historic environment.	English Heritage	The uncertainties in the appraisal exist because the locations of the facilities are not known at this stage. It is not the role of the NLJWS to allocate sites for future development as this is undertaken through the planning system and the North London Waste Plan (NLWP) currently being prepared. The NLWP will be subject to Sustainability Appraisal and therefore this provides an opportunity to test impacts on the built and historic environment. The NLJWS SEA does however recognise the importance of the built and historic environment and section 4.2.4 provides a commitment to undertake an Environmental Impact Assessment for new facilities.
Concern that comments made at the Scoping stage have not been addressed in the final Environmental Report.	English Heritage	Comments received at the scoping stage have been incorporated in the Revised Scoping Report and future stages of the SEA where relevant.

3.1.5 Revisions Post-Consultation

As a result of the consultation process further amendments were made to the NLJWS and to the Environmental Report. In addition some further changes were made to the NLJWS following the Equalities Impact Assessment carried out in September 2008. Where changes to the NLJWS were proposed these were screened to determine if further assessment was required against the SEA objectives and where necessary amendments were made. This led to the publication of the final Environmental Report in December 2008.

3.1.6 Adoption

The NLJWS was approved and adopted by all partner authorities between June and December 2008. The final Environmental Report September 2008 accompanies this version of the NLJWS and describes the likely environmental effects of the strategy implementation

3.2 Monitoring

The Environmental Report makes recommendations for indicators to monitor any environmental effects of implementing the NLJWS. The purpose of this monitoring is to address both the likely significant impacts and unforeseen effects of implementation to the strategy, to enable the North London Waste Authority to respond and take any necessary action. A monitoring framework is being developed alongside an implementation plan specifically for taking action on climate change. This will contain indicators linked to the SEA objectives which are set out in Table 6.1 of the Environmental Report.