

Agenda Item No:

NORTH LONDON WASTE AUTHORITY

REPORT TITLE:

DRAFT FURTHER ALTERATIONS TO THE LONDON PLAN

REPORT OF:

HEAD OF WASTE STRATEGY AND CONTRACTS

FOR SUBMISSION TO:

AUTHORITY MEETING

DATE:

20th December 2006

SUMMARY OF REPORT:

This report summarises the key changes outlined in the draft *Further Alterations* to the London Plan, the spatial development strategy for Greater London, and provides a draft response on the same to the Mayor of London which Members are asked to formally approve.

RECOMMENDATIONS

The Authority is recommended to

- i) approve the response to the draft *Further Alterations* to the London Plan attached and to;
- ii) note that officers expect to submit a draft response to the Revised Draft *Minor Alteration* to the London Plan on waste apportionment to the February 2007 meeting of the Authority.

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

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Date:

1.0 SUMMARY

1.1 Following a previous consultation on draft 'Early Alterations to the London Plan' and a subsequent Examination in Public (EiP) of the same a consultation on draft *Further* Alterations to the London Plan has been issued by the London Mayor. The new draft for consultation therefore incorporates additional draft changes to a document which has already been amended as a result of the consultation on the Early Alterations, including the EiP and subsequent EiP panel report. The consultation document which has been issued therefore shows:

- The original version of the London Plan
- The new version of the London Plan incorporating the changes resulting from the consultation on the Early Alterations and the EiP (although these have not been formally published as a separate document).
- The proposed further alterations to the 'new version' of the plan.

1.2 Two of the reasons for the Greater London Authority issuing a further consultation document and amending a plan which has only recently been amended include firstly the need to take account of and to address the potential impact of climate change and how best to mitigate its effects in a general sense. Secondly, in relation to waste, there is a need for a further consultation on the issue of waste apportionment – something which was only raised during the consultation on the Early Alterations.

1.3 The Authority report which follows does not attempt to highlight the differences between the original version of the London Plan and the new version as the changes incorporated in the latter have already been subject to a separate statutory Alteration process. It therefore focuses upon the *further* additional changes which are proposed.

1.4 As the main thrust of the consultation on the Further Alterations was already known by the previous Authority meeting Members approved then a draft response which had already been submitted on one detail relating to how waste apportionment would be calculated.

1.5 This report provides an overview and draft response to the full draft Further Alterations on which the London Mayor is currently consulting.

2.0 OVERVIEW OF THE DRAFT FURTHER ALTERATIONS TO THE LONDON PLAN

2.1 In line with Section 341 of the Greater London Authority Act 1999, the Mayor of London has prepared draft *Further* Alterations to the London Plan, the spatial development strategy for Greater London. In accordance with Section 335 of the Act above, the draft proposals were made available first to the London Assembly and functional bodies for the purposes of consultation between 30th May and 21st July 2006.

- 2.2 The Authority was invited to comment upon the draft *Further* Alterations during the above period, but did not do so, principally so that it could take account of the results of the Inspector's report of the Examination in Public of the draft *Early* Alterations to the London Plan and supplementary research and waste apportionment modeling commissioned by the GLA that had not yet been published.
- 2.3 It was also the case that the draft *Further* Alterations consultation with the Assembly was being conducted at the same time as the Authority was supporting the Planning Officers' Group giving oral evidence to the Examination in Public which was considering the Draft *Early* Alterations to the London Plan on which the Authority and individual boroughs in their capacities as waste collection and planning authorities had given written evidence. This meant officer time was not available to review what was being considered by the Assembly.
- 2.4 However, Members are now invited to approve the draft response to the public consultation on the *Further* Alterations to the London Plan, which has been consulted upon between 25th September and 22nd December 2006 (amended from 15th December as stated in the last Authority meeting). The Examination in Public of the draft *Further* Alterations is now due in June 2007. Adoption and publication of the *Further* Alterations to the London Plan is planned to be in Spring 2008.

3.0 ADDITIONAL REVISED DRAFT MINOR ALTERATION – BOROUGH LEVEL WASTE APPORTIONMENT

- 3.1 Planning Policy Statement (PPS) 10 requires the London Plan to apportion the tonnages of waste to be managed in the region to each Waste Planning Authority area (WPA) or to groups of WPAs where they have agreed to work jointly (see PPS10 paragraph 9).
- 3.2 The underlying rationale is that this needs to be done in order to meet the national policy aim that most waste should be treated or disposed of within the region in which it is produced (regional self-sufficiency). In practical terms this means that facilities are required for all wastes (municipal, other commercial & industrial and construction & demolition wastes) with sufficient capacity to manage 75 percent (15.1 million tonnes) of these wastes arising within London by 2010, rising to 80 per cent (18.2 millions tonnes) by 2015 and 85 per cent (19.6 million tonnes) by 2020. For municipal waste, the self-sufficiency targets are 50% in 2010, 75% in 2015 and 80% in 2020.

- 3.3 The existing London Plan and the draft *Early* Alterations had included some proposals for setting a strategy for waste management and signaling a broad apportionment of waste to sub-regions. It is noted in the original London Plan (February 2004) that the Central London sub-region will be unable to achieve self-sufficiency in terms of waste management and that 'excess' waste from the Central sub-region will need to be managed in other sub-regions. This is reflected in the draft *Early* Alterations to the London Plan, which also gives an indicative land requirement for waste facilities in each sub-region along with indicative numbers of facilities in each sub-region taking into account the redistribution of waste from Central London and the opportunities arising in the other sub-regions.
- 3.4 The draft *Early* Alterations to the London Plan proposed that 50% of the surplus waste from Central London be redistributed to the East sub-region, 28% to the West sub-region and 22% to the North sub-region (nothing to the South). For the purposes of the draft *Early* Alterations and clarification: Camden and Islington were at that draft *Early* Alterations stage in the 'Central' sub-region area and Hackney in the East, the four remaining boroughs comprised the 'North'. However, it is noted that for housing targets which were outlined in the draft *Further* Alterations the 'North' sub-region includes all seven of the Authority boroughs plus Westminster.
- 3.5 One of the principal matters addressed by the EiP of the draft *Early* Alterations of the London Plan was this matter of apportionment – the method by which waste being generated by boroughs which do not have the capacity to deal with their own rubbish, is apportioned to other boroughs to manage on the generating boroughs' behalf so that London as a whole meets its regional 'self sufficiency' targets. Primarily the boroughs with a shortfall in waste management capacity are those within the centre of London and those which might be able to help by taking an apportionment of central London's waste, on the outskirts north of the Thames.
- 3.6 As outlined in the report on the Draft *Further* Alterations to the London Plan presented at the last Authority meeting and noted above, the draft *Early* Alterations to the London Plan proposed that the majority (50%) of central London's 'excess' waste be apportioned to the Eastern planning sub-region with the remainder split between the North (22%) and the West (28%). None was apportioned to the South. Representation from the Eastern Planning sub-region in particular at the EiP argued strongly that the apportionment was based upon out-of-date information regarding available land for facilities for example, that insufficient account was being taken of the historical legacy of waste management facilities in the East and that the apportionment of the majority of central London's excess waste to the Eastern region was inequitable for the above and a range of other additional reasons.

- 3.7 Discrepancies between the sub-regional planning groupings used in the London Plan and waste groupings such as the NLWA also made the issue of apportionment difficult for groups of authorities in terms of showing conformity with the London Plan on the issue of waste apportionment. In North London for example the work on the Joint Waste Development Plan assumed that because the boroughs in the Authority's area were seeking to manage the waste produced by two 'central' London boroughs (Camden and Islington) as well as one from the 'Eastern' planning area (Hackney), and the four 'Northern' planning boroughs (Barnet, Enfield, Haringey and Waltham Forest), then the group of planning authorities in the Authority area would be in conformity with the London Plan because they were planning to manage an appropriate 'share' of central London's waste.
- 3.8 However, in a joint statement put to the London Plan draft *Early Alterations* EiP in June, the Government Office for London, the Greater London Authority, London Councils (formerly the Association of London Government) and the Association of London Borough Planning Officers agreed to commission an exercise to apportion tonnages of municipal and commercial/industrial waste at a London borough level. A borough apportionment would have the benefit that if planning and waste sub-regional boundaries were different, it would still be possible to calculate the amount of waste to be managed in the area by simply summing the borough apportionment figures together. This proposal was subsequently endorsed by the EiP Panel Report and in early September a draft borough level apportionment was completed by Jacobs Babtie following input from the Authority and others provided at a stakeholder workshop on 9th August. Whilst the Authority expressed concerns about the information base to be used in calculating the borough apportionment figures at the stakeholder workshop and in a subsequent note, the principle of apportioning total London self-sufficiency targets to a Borough level was supported by the Authority.
- 3.9 The Jacobs Babtie apportionment report was subsequently subjected to a sustainability appraisal. This appraisal found that one of the key inputs to the apportionment model – vacant and potentially available industrial land from a 2003 GLA industrial land availability study – was not sufficiently up-to-date to provide a reliable basis for the apportionment, particularly in the light of large-scale schemes which have come forward since that date, such as the Olympic development in the Lower Lea Valley, a point which had also been raised by the Authority (and others) in its comments on the model. The appraisal therefore recommended that the apportionment model should be recalculated using new data provided at a borough level.

- 3.10 The London Mayor accepted the advice from the sustainability appraisal and gave a commitment in paragraph 4.10f of the draft *Further Alterations* to the London Plan that a table (Table 4A.4) showing the borough level waste apportionment would be published separately as a further 'minor alteration' to the London Plan. It was proposed that the methodology and detailed calculations used for the borough level apportionment would be published separately as a report by Jacobs Babtie.
- 3.11 On 22nd November the additional 'minor alteration' to the London Plan – primarily a revised table 4A.4 showing the 'excess' waste from central London to be apportioned to each borough – was released, although without the additional Jacobs Babtie report on the methodology used for the calculations. It had originally been the intention of Authority officers to provide a formal response to this minor alteration at the same time as responding to the Draft *Further Alterations* to the London Plan.
- 3.12 However, subsequent to the release of the borough apportionment figures on 22nd November this minor alteration was formally withdrawn due to the use of incorrect figures. On Friday 1st December the London Mayor therefore formally withdrew the document deposited on 22nd November and published a "Revised Draft Minor Alteration" with a new twelve week consultation period. The revised draft minor alteration also appeared on the Greater London Authority website on that day.
- 3.13 The new formal consultation period is from Friday 1st December 2006 to Friday 2nd March 2007, and was notified by a Statutory Notice in the London Gazette and in the Evening Standard. This notice covers both the withdrawal of the initial draft minor alteration and the publication of the revised draft minor alteration.
- 3.14 The Jacobs Babtie report will also be issued separately before the end of the year. A meeting at which the Jacobs Babtie report and methodology will be explained and can be discussed is scheduled for 20th December. The table below summarises the different public consultation versions of and alterations to the London Plan for ease of reference.

Document	Published for Public Consultation	Consultation Deadline
Draft London Plan	June 2002	30 th September 2002
Draft <i>Early</i> Alterations	October 2005	20 th January 2006
Draft Early Alterations to the London Plan, Examination in Public Panel Report - Published but <i>NOT</i> for consultation September 2006		
Draft <i>Further</i> Alterations	19 th September 2006	22 nd December 2006
Draft <i>Minor</i> Alteration – Borough level waste apportionment	22 nd November 2006	<i>Withdrawn</i> 1 st December 2006
REVISED Draft <i>Minor</i> Alteration – Borough level waste apportionment	1st December 2006	2 nd March 2007

- 3.15 The following Authority report and draft response to the *Further* Alterations to the London Plan makes no reference to borough waste apportionment which will accordingly be considered separately at the next Authority meeting.

4.0 PRINCIPAL CONSULTATION ISSUES

Planning Sub-Regions – Changes

- 4.1 The first issue arises from a change in planning sub-regions between the *Early* Alterations to the London Plan and the draft *Further* Alterations to the London Plan. The differences between the boroughs contained within the Northern planning sub-region as outlined in the *Early* Alterations to the London Plan and the boroughs contained within the Northern planning sub-region as outlined in the draft *Further* Alterations to the London plan are shown in the table below.

NLWA Boroughs and their planning sub-region as outlined in the:	Boroughs included in the Northern Planning Sub-Region	NLWA boroughs excluded from the Northern Planning Sub-Region & the Planning Sub-Region to which they were/are assigned in brackets
Draft <i>Early</i> Alterations to the London Plan	Barnet	Camden (Central)
	Enfield	Islington (Central)
	Haringey	Hackney (Eastern)
	Waltham Forest	
Draft <i>Further</i> Alterations to the London Plan	Barnet	Waltham Forest (Eastern)
	Camden	
	Enfield	
	Hackney	
	Haringey	
	Islington	
	Westminster (non-NLWA)	

- 4.2 From a waste planning perspective the boroughs within the Authority’s area have agreed to continue to work together as a grouping and, from a waste apportionment perspective with a borough apportionment of central London’s waste, it will be easier to calculate the amount of waste which needs to be managed within the Northern planning sub-region as well as the Authority area. The inclusion of Westminster in the draft Further Alterations northern sub-regional grouping and the exclusion of Waltham Forest should not impact on our seven constituent borough councils’ plans (in their separate capacities as local planning authorities) to prepare a joint waste development plan for the Authority area, provided that the apportionment of Central London’s waste to individual other boroughs in the draft Minor Alterations does not produce unexpected results.

Waste Technologies

- 4.3 The London Mayor continues to have a presumption in favour of new and emerging waste treatment technologies over energy-from-waste incineration as used in North London for over thirty years, particularly where these have the potential to generate “renewable hydrogen”. Both the detail and rationale for the London Mayor’s stated technology preferences requires comment in the Authority’s response to the draft Further Alterations to the London Plan as well as the principle of prescriptive technology statements being included within a spatial development strategy.

Site Identification

- 4.4 The London Mayor proposes in the draft Further Alterations that he should identify sites for new waste facilities needed under the London Plan, and indicate their potential use against a list of facility types. The draft response attached proposes that the Authority should be opposed to granting the London Mayor such an interventionist role in site identification; broad locations have already been identified in the London Plan, which is reasonable for a strategic authority to do in a regional spatial development strategy.
- 4.5 If, however, the Planning Inspector is minded to grant the London Mayor a role in site identification, the Authority should suggest most strongly that this proposed role requires clarification and further explanation to make clear its scope and how it relates to the site identification work of local planning authorities (individually or in sub-regions), and that adequate time should be given to this at the Examination in Public.

Broader Issues

- 4.6 A range of additional issues for noting, rather than for formal consideration and response are:
- An increased emphasis in general terms in the Further Alterations to the London Plan on the need to adapt to the impacts of climate change and to plan to help reduce climate change. This includes for example, more emphasis on sustainable transport, including the transport of waste; considerations in relation to building on flood plains and sustainable design considerations, particularly the energy usage of buildings within London.
 - An increased emphasis on London working more closely with surrounding planning regions in terms of planning for waste and other issues.
 - Particular considerations for North London in terms of the concentration of new development and therefore the likely generation of waste, particularly non-household waste. Two areas of development are identified within the Authority area: the Stanstead, Cambridge, Peterborough growth corridor to the east of the region and the M1 or 'North West London to Luton' growth corridor to the west.
 - The younger than average population profile of London compared to the rest of the country and the implications this has for both the type of household waste produced and effective communication approaches to reach this audience.
 - Finally, a mismatch between anticipated housing and population growth within North London and the creation and development of new jobs
- 4.7 A full draft response for approval is set out at Appendix 1.

5.0 IMPLICATIONS FOR THE AUTHORITY

- 5.1 The main implications for the Authority of the draft Further Alterations to the London Plan are likely to be the impact of the Mayor seeking to influence disposal authorities' technology choices, planning authorities' site choices and the overall impact of the waste apportionment modeling which is to be considered separately and at the next Authority meeting.

6.0 RECOMMENDATIONS

- 6.1 The Authority is recommended to
- i) approve the response to the draft *Further* Alterations to the London Plan attached and to;
 - ii) note that officers expect to submit a draft response to the Revised Draft *Minor* Alteration to the London Plan on waste apportionment to the February 2007 meeting of the Authority.

7.0 COMMENTS OF THE FINANCIAL ADVISER

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

8.0 COMMENTS OF THE LEGAL ADVISER

- 8.1 The Legal Adviser has reviewed this report and has no further comments to add.

Local Government Act 1972 – Access to information

Documents used: Borough level waste apportionment – REVISED draft minor alteration to the London Plan (Spatial Development Strategy for Greater London), December 2006

Borough level waste apportionment – Draft minor alteration to the London Plan (Spatial Development Strategy for Greater London), November 2006

Draft Further Alterations to the London Plan (Spatial Development Strategy for Greater London), Mayor of London, September 2006

Draft Early Alterations to the London Plan, Examination in Public 2006, Panel Report, September 2006

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APPENDIX 1.

Ken Livingstone, Mayor of London
(London Plan Further Alterations)
Greater London Authority
FREEPOST 15799
London
SE1 2BR

20th December 2006

Dear Mayor Livingstone,

Public consultation paper on Draft Further Alterations to the London Plan (Spatial Development Strategy for Greater London), September 2006

Thank you for providing the North London Waste Authority with the opportunity to respond to the consultation on the draft further alterations to the London Plan.

You will note that the NLWA is one of the four joint waste disposal authorities in London and that we are responding within the context of having agreed with our constituent borough councils (Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest) a draft joint waste strategy with a recycling and composting target of 35% recycling and composting by 2010 and 45% recycling and composting by 2015 and all our seven boroughs having agreed to prepare a joint waste development plan document.

Please find the Authority's full comments attached, but please also note that 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 faithfully,

Cllr. Brian Coleman
Chairman, North London Waste Authority

Comments on the Draft Further Alterations to the London Plan from the North London Waste Authority

The Authority's comments are focused upon Chapter 4A 7 of the Draft Further Alterations to the London Plan, *Planning for Waste*, although the Authority has noted and reviewed other relevant sections of the Plan which might impact upon the amount and composition of waste arising in the future.

The Authority's comments are also focused upon the proposed changes in the draft *Further* Alterations to the London Plan, i.e. the Authority is not commenting (except in a small number of places which are identified) upon the changes already made as a result of the consultation on the Early Alterations to the London Plan or the Examination in Public of the same and the Panel's subsequent report.

The Authority will be commenting additionally on the separately released draft *Minor* Alteration to the London Plan, Borough level waste apportionment.

The table below outlines the Authority comments in the light of the above points.

Reference	<i>Draft Further Alteration</i>	North London Waste Authority's Response
Planning for Waste		
Policy 4A.1 Waste strategic policy and targets	<p>Significant changes (as identified by bold and highlighted text) to this policy include:</p> <ul style="list-style-type: none"> - a new reference to minimising energy use in the movement and management of waste in line with the Mayor's target of reducing carbon emissions - the addition of a reference to the promotion of renewable energy and renewable hydrogen - a new reference to minimising the transport impacts of waste movement both within and outside of London 	<p>The Authority supports the principle of minimising energy use in the movement and management of waste in line with carbon reduction targets, but suggests the reference to "energy used" should be "net energy used" and that "management of waste" should be "treatment and disposal of waste". However, clarity is required regarding how conformity with this policy will be judged, with published guidance from the London Mayor indicating how different energy sources and emissions are compared to each other (possibly in 'carbon equivalent' terms) as some waste management options release other 'greenhouse' gases e.g. methane from landfill sites.</p> <p>The Authority opposes the use of an undefined term such as "renewable hydrogen", although we note that "renewable energy" is defined in the glossary to the Draft <i>Further Alterations</i> to the London Plan as being energy derived from a source that is continually replenished, such as wind, wave, solar, hydroelectric and energy from plant material, but not fossil fuels or nuclear energy. The glossary states that geothermal energy which not strictly renewable is generally also included. It is unclear from this definition where 'renewable' hydrogen production fits in – a point which requires clarification as it may otherwise lead to conflict, deadlock or litigation. The Authority would like the opportunity to comment on any proposed clarification.</p> <p>Finally, the Authority supports the policy of minimising the transport impacts of waste movement within and outside of London – but this must be at an economic cost which is justifiable. This justification might include an assessment of the environmental cost of transport movements, but some recognition of economics should be included within this policy change and it would be more accurate for the policy to say "minimise the environmental impacts of transport taking account of the economic cost of the same" , rather than the currently proposed amendment which reads "minimise the transport impacts...."</p>

Reference	<i>Draft Further Alteration</i>	North London Waste Authority's Response
Policy 4A.1 Waste strategic policy and targets	<p>This policy is also significantly changed by the addition of a specific reference to the encouragement of the production of energy from waste using new and emerging technologies, especially where it enables the generation of hydrogen</p> <p>And</p> <p>A further policy amendment which states that the Mayor will also consider, in preference to incineration, technologies that have the potential to produce renewable hydrogen from waste</p>	<p>The Authority opposes this addition on four grounds:</p> <p>Firstly there is the problem already set out that “renewable hydrogen” is not defined and the Authority has concern about the problems this may lead to. Secondly there is the technically flawed assumption that hydrogen can only be created from new and emerging technologies, whereas the use of electricity (which can demonstrably be generated from waste) to separate water into hydrogen and oxygen is a proven technology.</p> <p>Thirdly, in the light of proposals to revise the EU waste framework Directive and to use an energy efficiency threshold as a method for determining whether municipal waste incineration will be classified as ‘disposal’ or ‘recovery’ it might be helpful for the Further Alterations to the London plan to refer to the promotion and encouragement of the most energy efficient technologies (i.e. net energy used and recovered), rather than being prescriptive about technology type.</p> <p>Finally it is inappropriate for the London Mayor to decide in a spatial strategy how a waste disposal authority should meet the London Mayor’s legitimate strategic environmental objectives; this should remain a matter for local democratic choice.</p>

Reference	<i>Draft Further Alteration</i>	North London Waste Authority's Response
Policy 4A.2 Spatial policies for waste management	This policy now includes specific reference to <i>communities taking more responsibility for their own waste and dealing with waste in one of the nearest appropriate installations</i>	<p>The Authority opposes these new words as they are too ill-defined. The new wording may lead to sites near to disposal authority boundaries not being used for municipal waste because the procuring and funding authority might be forced to make capacity available to "communities" (however defined) from neighbouring disposal authority areas to use its facility at the expense of parts of its own area that may be further away, but for whom the proposed site is the only option.</p> <p>The Government has clearly stated its intention to retain current organisational arrangements for municipal waste in London, which means this is a matter of real concern for the proposed Cricklewood Redevelopment in the Authority's area on the border with West London Waste Authority (WLWA). In this case the existing and proposed replacement sites are in Barnet (NLWA), but waste from Camden (NLWA) might be displaced by waste from Brent (WLWA), despite waste from Camden having nowhere else to go and NLWA having liability for waste from Camden.</p> <p>However, as the Authority recognises that such an outcome is not what the London Mayor seeks, we propose the following alternative words: "disposal authority areas, individually or in partnership, taking more responsibility for their own waste and dealing with waste in the nearest appropriate installation in their area or, if none, the nearest appropriate available installation".</p>

Reference	<i>Draft Further Alteration</i>	North London Waste Authority's Response
Policy 4A.2 Spatial policies for waste management	The draft further alteration now states that ' <i>the Mayor will and DPD policies should</i> ' amongst other things 'identify new sites in suitable locations for new <i>recycling and waste treatment facilities, such as MRFs, Civic Amenity sites, construction and demolition waste recycling plants and closed vessel composting.</i> '	<p>The Authority is opposed to granting the London Mayor such an interventionist role in site identification; broad locations have already been identified in the London Plan, which is reasonable for a strategic authority to do in a regional spatial development strategy.</p> <p>If, however, the Planning Inspector is minded to grant the London Mayor a role in site identification, the Authority suggests most strongly that this proposed role requires clarification and further explanation to make clear its scope and how it relates to the site identification work of local planning authorities (individually or in sub-regions), and that adequate time should be given to this at the Examination in Public.</p> <p>Finally, the Authority also suggests that if reference to "Civic Amenity sites" is to remain, it should be replaced with "Household Waste Re-use and Recycling Centres" in conformance with the London Mayor's municipal waste management strategy, notwithstanding the duality of prevailing legislation on this matter.</p>
Policy 4A.3 Criteria for the selection of sites for waste management and disposal	The draft further alteration to the site selection criteria now includes specific reference to the impact on water resources	Whilst the Authority agrees that the London Mayor should consider the impact on water resources of new waste developments, this appears not to be the right place to do so, as this paragraph is about environmental impacts immediately perceived by people in the vicinity of proposed sites. The Authority suggests that the impact on water resources should be included at 4A.1.
Policy 4A.3 Criteria for the selection of sites for waste management and disposal	Early Alteration In paragraph 4.5 the Early Alteration makes reference to the predicted growth in waste arisings in London and says that <i>Table 4A.1 shows this by waste source.</i>	This implies that Table 4A.1 in Appendix 1 shows forecasted growth in different types of waste, it does not. Table 4A.1 just shows total waste produced (by type) and disposal method in London in 2003. The Authority recommends that paragraph 4.5 is slightly reworded to reflect the fact that Table 4A.1 does not show waste growth at all.

Reference	<i>Draft Further Alteration</i>	North London Waste Authority's Response
Policy 4A.3 Criteria for the selection of sites for waste management and disposal	<p>Early Alteration Paragraph 4.7 now states that:</p> <p><i>The Mayor's Municipal Waste Management Strategy (MMWMS) states that opportunities for waste minimisation, reuse, recycling or other forms of energy recovery such as new and emerging advanced conversion technologies should be considered in preference to conventional incineration...</i></p>	<p>Whilst the Early Alterations to the London Plan are no longer under consideration, the Authority notes that this paragraph is a change from the former paragraph in the London Plan which stated that:</p> <p><i>The Mayor's Municipal Waste Management Strategy (MMWMS) states that waste should be treated in the following priority order: to reduce, re-use, recover recycling, composting, energy dispose....</i></p> <p>The more prescriptive reference to new and advanced conversion technologies being considered in preference to conventional incineration imposes too prescriptive a burden on waste disposal authorities, as per our comments on Policy 4A.1.</p>
Policy 4A.21ii Additional land requirement for recycling and waste treatment facilities	Paragraph 4.10f notes the decision to carry out an exercise to apportion London's municipal and commercial and industrial waste to be managed at borough level.	The Authority will respond separately to the proposed Minor Alteration on Borough level waste apportionment, but in principle supports this approach to apportionment, so long as these streams are apportioned separately. This is necessary because different regional self-sufficiency targets apply to municipal waste in the London Plan.

Report Ends