

NORTH LONDON WASTE AUTHORITY

REPORT TITLE:

**MAYOR OF LONDON'S DRAFT ALTERATIONS TO THE LONDON PLAN
(SPATIAL DEVELOPMENT STRATEGY FOR GREATER LONDON) HOUSING
PROVISION TARGETS WASTE AND MINERALS**

REPORT OF:

HEAD OF WASTE STRATEGY AND CONTRACTS

FOR SUBMISSION TO:

AUTHORITY MEETING

DATE:

8TH FEBRUARY 2006

SUMMARY OF REPORT:

This report sets out the principal matters raised in a public consultation paper produced by the Mayor of London on proposed alterations to the London Plan (Spatial Development Strategy for Greater London) Housing Provision Targets Waste and Minerals.

RECOMMENDATIONS

The Authority is recommended to approve the draft response to the consultation paper as outlined in Appendix 1.

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

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Date:

1. INTRODUCTION

- 1.1 The London Plan published in 2004 sets out the Mayor's vision for London and his general policies for land use and development. When the London Plan was published in February 2004, the Mayor said that he would carry out further research on housing capacity and on sites for waste recycling and waste treatment and where necessary bring forward alterations to the plan to update its policies on housing provision, waste and minerals in the light of this research.
- 1.2 In July 2005, following completion of the research, the Mayor of London published draft early alterations to the London Plan in relation to housing provision targets and waste and minerals, for consideration by the London Assembly and the GLA Group (Transport for London, the London Development Agency, the Metropolitan Police Authority and the London Fire and Emergency Planning Authority).
- 1.3 A copy of these draft alterations was sent to the Authority for initial comment during the Mayor's consultation with the London Assembly and an initial response was submitted to the Mayor of London from the Authority, (Authority report for 19 October 2005 entitled 'London Mayor's Waste Consultations').
- 1.4 The draft alterations to the London Plan have now been refined in the light of the comments made during the first round of consultation with the London Assembly and a resultant public consultation document was issued in October 2005. The closing date for comments was 20 January 2006. Changes between the published London Plan (policy and supporting text) and the draft alterations document are shown by the use of bold text within the document.
- 1.5 Although the Authority submitted a response to the first consultation on the draft early proposed alterations to the London Plan, a commitment was made to respond in full at the formal, public consultation stage. Members are therefore recommended to approve the Authority's response to the public consultation attached in Appendix 1. ¹

¹ The draft response has already been submitted to the Mayor of London on the full understanding that a final response will be submitted following due consideration by Members.

2. SUPPORTING DOCUMENTATION

2.1 Accompanying the draft alterations document and for consideration as part of the same are the following reports:

2.1.1 *Recycling and recovery facilities Sites investigation in London - July 2005*. This is a report prepared by Land Use Consultants (LUC) and SLR Consulting Ltd for the Greater London Authority. This report outlines the results of LUC and SLR research into the existing waste management and waste processing capacity in London, a review of potential new requirements to meet future targets on waste and an assessment carried out by the consultants of potential sites for these new facilities. The study therefore evaluates the adequacy of London's existing waste management and disposal facilities to meet London's future needs for all waste streams, and identifies the potential to locate new recycling and recovery facilities in London.

2.1.2 This study concludes that in London as a whole, there are sufficient potential new sites of sufficient size to meet London's future waste treatment needs, but that this is not the case for individual Boroughs and some planning sub-regions. The draft alterations to the London Plan are based upon this study.

2.1.3 A technical report entitled *Alterations to the London Plan Policies on Waste Technical Report - October 2005*. This report provides further information on the bases for the assumptions and calculations made and used to develop the Draft Alterations to the London Plan document. In particular, this document provides useful information on predicted waste arisings growth of non-municipal waste.

2.1.4 *A Sustainability Appraisal (SA)* - which is a specific requirement set out in Regulation 7(2) of the Town and Country Planning (London Spatial Development Strategy) Regulations 2000. The SA has been written to meet the requirements for Strategic Environmental Assessment (SEA) in accordance with European Directive 2001/42/EC (also known as the SEA Directive).

2.1.5 The sustainability appraisal process identified three policy options for housing growth, three options for waste and two options for minerals. These options were tested against a sustainability appraisal framework comprising the 33 objectives used for the sustainability appraisal of the London Plan. The options were tested at a regional and sub-regional level. However, it is acknowledged that the impact of the options will largely occur at a local level through the implementation of the Unitary Development Plan and Local Development Framework Policies.

2.1.6 In the sustainability appraisal, option three was identified as the most sustainable option for waste. This option is for London to be managing 85% of its own waste by 2020, referred to as '85% self sufficiency', combined with a sub-regional distribution of central London's waste, of which 20% would come to North London. A relatively more even distribution of waste management facilities in London was also found to have overall less negative impacts as part of this process. (Option 1 which was rejected had a target of 70% self-sufficiency by 2020 and option 2, also rejected, had an 85% self sufficiency target by 2020, but with a concentration of waste management in East London.

3. THE RATIONALE FOR CHANGE

- 3.1 On the basis of the above, the Mayor of London proposes changes to some of the policies and detail included in the London Plan which the consultation says will:
- 3.1.1 Increase the number of new homes to take account of upwardly revised household and population growth estimates and reducing the backlog of existing unmet housing need.
 - 3.1.2 Make provision for an output of 1 million tonnes of 'land won' aggregate per annum until 2016 which should be met by a 0.5 million tonnes apportionment to East London and 0.5 million tonnes to West London.
 - 3.1.3 Enable London to meet its municipal waste recycling targets in the face of both a growing population and a recycling rate which is poor. The consultation document states that London is the second worst performing English region for recycling municipal waste, and states that on current trends it may soon be the worst. However, the Association of London Government notes that London does well when compared to other metropolitan areas, rather than to other regions, which have a balance of metropolitan and rural land use within them.
 - 3.1.4 Enable London to reduce its contribution to climate change through the use of new technologies which produce renewable energy and renewable hydrogen.
 - 3.1.5 Expand London's green economy through the provision of new jobs and opportunities from increased recycling and reprocessing.
 - 3.1.6 And finally the changes will, suggests the consultation, ensure that Londoners are 'facing up to our environmental responsibilities'. In line with national policy London is seeking to become more 'self sufficient', i.e. treating or disposing of waste within the region in which it is produced.

- 3.2 The Authority's draft response, attached in Appendix 1 is focused upon the proposed alterations to the *strategic and spatial policies for waste management* (Policies 4 A.1 to 4 A.3) and *six new waste policies* which are outlined in the document, which are all aimed at addressing regional self sufficiency and reducing London's dependence on landfill and increasing rates of recycling and recovery.
- 3.3 Alongside the proposed changes, and previously the subject of a separate scoping paper from the Mayor to which the Authority responded, (see Authority report of 6 July 2005 entitled 'London Mayor's Waste Consultations'), the Mayor of London is also seeking additional powers from Government. The Mayor states that he needs these additional powers to help him address the current arrangements which his scoping paper describes as '(ones which) do not operate efficiently, cost-effectively or sustainably'.

4. PLANNING FOR WASTE - CHANGES PROPOSED

- 4.1 Specifically the changes included in the draft alterations to the London Plan:
- 4.1.1 Increase the waste management capacity requirements for London to be 75% self sufficient by 2010, 80% self sufficient by 2015 and 85% self sufficient by 2020, (managing respectively 15.1 million tonnes, 18.2 million tonnes and 19.6 million tonnes - compared to original (initial consultation) figures of 15, 17.4 and 19.3 million tonnes respectively).
- 4.1.2 State that Boroughs should plan for all waste streams in their development plan documents with the aim of both supporting the Mayor's Municipal Waste Management Strategy (and potentially the Mayor's 'wider waste strategy, although this is not stated) and with the aim of both driving all waste management up the waste hierarchy and with the objective of self sufficiency. It is unclear from the document at this point whether this is borough self sufficiency or London-wide self sufficiency. There is also no mention of joint working to achieve prevention targets or to plan for activities which are 'higher up the waste hierarchy.
- 4.1.3 State that wherever feasible, surplus waste transfer sites should be re-used for other waste uses.
- 4.1.4 State that where waste cannot be dealt with locally, facilities which have good access to water or rail transport should be promoted
- 4.1.5 Safeguard all existing waste management sites (unless other compensatory provision is made).

4.2 In relation to technology choice the document states that:

“...Energy recovery should be carried out through advanced conversion techniques, i.e. gasification, pyrolysis or anaerobic digestion or any combination of these that satisfy the requirements of the Renewables Obligation Order 2002. Modern facilities should be well designed and demonstrate that they achieve the best practicable environmental option. They need not be bad neighbours and could be a source of new products and new jobs.”

4.3 The consultation paper goes on to say that:

“The Mayor is concerned that opportunities to develop recycling and composting should not be crowded out by mass burn incinerator use. He therefore will consider in preference other forms of new and emerging technology including mechanical and biological treatment before new mass burn capacity. It is also the intention that current incinerator capacity will be reorientated towards non-recyclable residual waste.”

4.4 Six new waste policies are proposed in the draft alterations:

4.4.1 Boroughs should protect existing waste sites and facilitate the maximum use of existing waste sites, particularly waste transfer facilities and existing landfill sites. If for any reason an existing waste management site is lost to non-waste use, an additional compensatory site provision will be required that normally meets the maximum throughput that the site could have achieved.

4.4.2 In order to ensure sufficient land capacity to meet the indicative sub-regional provision 2005-2020 London borough development plan documents should:

- Identify enough additional land capacity to contribute sufficiently and appropriately to the achievement of sub-regional (strategic planning authority) provision.
- Collaborate at the sub-regional level in order to ensure that each borough allocation is sufficient to meet cumulatively the sub-regional apportionment.
- With the Mayor, keep the indicative sub-regional apportionments under review and monitor progress towards their achievement.

- 4.4.3 Boroughs in their development plan documents should identify a range of waste management facilities to manage a capacity of 13.5 million tonnes of municipal and commercial and industrial waste, to be provided 2005-2020 in accordance with the locational criteria set out in Policies 4A.2 and 4A.3. (No mention is made of the need to identify specific facilities for construction and demolition waste, see paragraph 4.4.5 below, or for 'special', i.e. hazardous waste, which also forms part of the overall waste stream).
- 4.4.4 Boroughs in their development plan documents should identify adequate provision for the scale of waste use identified. The broad locations for these facilities are:
- Strategic Employment Locations (Preferred Industrial Locations and Industrial Business Parks),
 - Local Employment Areas, and
 - Existing Waste Management Sites
- 4.4.5 The Mayor will, and Boroughs should, support new construction and demolition waste management facilities in London by encouraging recycling at existing sites, using mineral extraction sites for recycling and ensuring that major development sites are required to recycle by using mobile facilities on site wherever practicable. Development plan documents should also require developers to produce site waste management plans to arrange for efficient materials and waste handling.
- 4.4.6 The Mayor will work in partnership with the Boroughs, the Environment Agency and industry to provide and maintain direction on the need for hazardous waste management capacity.
- 4.4.7 Development plan documents should:
- Make provision for hazardous waste treatment plants to achieve, at regional level, the necessary waste management requirements.
 - Identify suitable sites for the storage, treatment and reprocessing of certain hazardous waste streams
 - Identify sites for the temporary storage, treatment and remediation of contaminated soils and demolition waste during major developments.

5. PRINCIPAL IMPLICATIONS FOR NORTH LONDON

- 5.1 For the purposes of this document it is first worth noting that any reference to the 'North' sub-regional planning area refers only to the Boroughs of Barnet, Enfield, Haringey and Waltham Forest. The area excludes Hackney which is in the Eastern area and Camden and Islington which are in the Central area.

- 5.2 Taking this boundary discrepancy into account, i.e. the difference between the Authority area and the sub-regional planning area, the draft alterations to the London Plan propose that the North London sub-regional planning area will need to allocate an additional 34.7 hectares of land for strategic recycling and waste treatment facilities, between 2005 and 2020, according to the Greater London Authority. This is a significant amount of land for four Boroughs to allocate to waste services. At this stage the draft alterations make no reference to taking account of other land use and infrastructure needs which are not referred to in the document.
- 5.3 Table 1 below shows the distribution of land take by sub-regional planning area, therefore comparing North London with the other planning sub-regions.

Table 1. Indicative sub-regional provision of additional land requirement for strategic recycling and waste treatment facilities 2005-2020						
	overall land requirement ha	from reuse of transfer capacity ha	sub regional requirement ha	sub regional re- allocation ha	sub regional provision ha	requirement per annum ha
East	85.5	40.5	45.0	+ 46	91.0	6.1
West	73.0	45.4	27.6	+ 26	53.6	3.6
North	34.7	23.3	11.4	+ 20	31.4	2.1
South	56.3	3.5	52.8	0	52.8	3.5
Central	106.8	0.0	106.8	- 92	14.8	1.0
London total	356.3	112.7	243.6		243.6	16.2

- 5.4 The above requirement for 'north' London (i.e. excluding, Camden, Hackney and Islington) is based on having 51 new waste facilities in North London:
- 33 MRFs
 - 10 composting facilities
 - 2 MBT plants
 - 4 anaerobic digestion plants
 - 2 gasification/pyrolysis facilities
- 5.5 Under the management option proposed, a major implication for North London is the requirement to identify 20 hectares (21% of central London's additional land requirements), for new waste sites to manage a proportion of central London's waste. This will be less of a change or concern for the Authority than for some others in London as the Authority's existing area already includes two 'central' London Boroughs – Islington and Camden and the Authority is already responsible for the disposal of municipal waste from the same. However, 'extra' non-municipal wastes from Central London will be required to be handled under this proposal.

- 5.6 The Authority's draft response also highlights other issues raised by the proposals such as the lack of clarity regarding such issues as '85% self sufficiency' for London, the overall basis on which the facility numbers and land take have been calculated – with a relatively large number of smaller sites rather than a smaller number of larger sized facilities - and questions the deliverability of the plan as outlined.
- 5.7 The impact of the Olympics and Paralympics in 2012 is not included in the Draft Alterations to the London Plan, but is anticipated to have an impact on both land use requirements and civil and other engineering resources within the capital in the run up to 2012. A comment is made about this in the Authority's draft response.

Table 2. Throughput and land take of different types of facilities			
facility type	throughput per facility (tonnes per year)	land take per facility (ha)	number of facilities required in North London
materials reclamation facility (recycling)	41,000	0.9	33
composting	19,000	1.25	10
mechanical biological treatment	128,000	1.75	2
anaerobic digestion	15,000	1	4
gasification/ pyrolysis	115,000	2.25	2
totals			51

Table 2 indicates the land take and facility numbers for the North London planning sub-region up to 2020 if the indicative range of recycling and waste treatment facilities suggested in the document is implemented on a sub-regional basis. Of the total land take requirements 23.3 hectares is estimated to come from the re-use of transfer capacity. This is based on the following projected waste tonnages.

Table 3. Projected waste tonnages

(thousand tonnes per annum)

NORTH Sub-Region	2010		2013		2015		2020	
	Municipal	C&I	Municipal	C&I	Municipal	C&I	Municipal	C&I
Barnet	199	255	210	285	218	300	238	344
Enfield	185	204	195	216	202	227	220	254
Haringey	128	124	136	132	141	139	155	154
Waltham Forest	138	112	146	114	151	119	165	126
Total	650	694	686	747	711	785	778	879

CENTRAL Sub-Region	2010		2013		2015		2020	
	Municipal	C&I	Municipal	C&I	Municipal	C&I	Municipal	C&I
Camden	155	521	163	557	168	585	181	659
Islington	108	311	115	336	119	353	131	395

EAST Sub-Region	2010		2013		2015		2020	
	Municipal	C&I	Municipal	C&I	Municipal	C&I	Municipal	C&I
Hackney	144	168	152	172	157	181	170	193

GRAND Total	1,057	1,694	1,116	1,812	1,155	1,904	1,260	2,126
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5.8 Appendix 1 outlines a draft response to the consultation document which has been submitted to the Mayor of London as a draft, subject to Member consideration and approval.

6. RECOMMENDATIONS

Members are now recommended to approve the draft response to the Draft Alterations to the London Plan. (See Appendix 1).

7. COMMENTS OF THE FINANCIAL ADVISER

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

8. COMMENTS OF THE LEGAL ADVISER

The Legal Adviser has reviewed this paper and there are no legal implications.

Local Government Act 1972 – Access to information

Documents and Websites used:

Alterations to the London Plan Policy on Waste Technical Report (October 2005)

Draft Alterations to the London Plan (Spatial Development Strategy for Greater London). Housing Provision Targets Waste and Minerals (October 2005).

Draft London Plan Alterations for initial consultation with the London Assembly and the GLA Group. Planning for Waste. Planning for Minerals. (July 2005).

London Plan - Spatial Development Strategy for Greater London (February 2004).

Recycling and Recovery Facilities. Sites investigation in London, Prepared by Land Use Consultants and SLR Consulting Ltd for the Greater London Authority (July 2005)

Sustainability Appraisal of The Draft Alterations to the London Plan (Spatial Development Strategy For Greater London) (October 2005)

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APPENDIX 1.

COMMENTS ON THE DRAFT ALTERATIONS TO THE LONDON PLAN

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

27 January 2006

Dear Sir,

**Public consultation paper on Draft Alterations to the London Plan (Spatial Development Strategy for Greater London) Housing Provision Targets. Waste and Minerals.
(October 2005)**

Thank you for providing us with the opportunity to respond to the consultation on the above. The NLWA is one of the six joint waste disposal authorities in England. We are responding within the context of having agreed with our constituent boroughs a 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 boroughs having agreed to prepare a joint waste development plan document.

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. Ray Dodds
Chair, North London Waste Authority

Appendix 1 – Comments on the Draft Alterations to the London Plan

Reference	Draft Alteration	Authority's Response
Planning for Waste		
Policy 4A.1 Waste strategic policy and targets	This policy refers to ensuring that facilities are in place to manage 85% of waste arising within London by 2020.	<p>There is a lack of clarity regarding the term 'self sufficiency'. The over-arching policy refers to being 85% self sufficient in London by 2020. We understand that the 85% self sufficiency target refers to municipal and commercial and industrial waste; the scope of the London Plan as outlined in PPS10. However, there is also reference to aggregates, construction and demolition and special waste in the document but it is unclear if these are included in the targets. Conversely there is no mention of agricultural or mine and quarry waste. Some clarification at the start regarding the scope of the London Plan in terms of waste streams and types would be helpful. It is imperative that this is made extremely clear in the final document.</p> <p>Also the addition of some words to clarify that transfer within London to reprocessing outside of London would be classified as 'self sufficiency', but that transfer within London to landfill disposal outside of London would not. It is essential that there is clarity over the issue of 'self sufficiency' and it would be helpful for example to add some clarification regarding whether transfer within London to a mechanical biological treatment (MBT) or gasification plant outside of London would be classed as self sufficiency, or whether only transfer to out-of-London recycling and reprocessing facilities counts towards the self sufficiency target.</p>

Reference	Draft Alteration	Authority's Response
Policy 4A.1 Waste strategic policy and targets	This policy also identifies that Boroughs should ensure sufficient land resources are available to implement the Mayor's Municipal Waste Management Strategy, Waste Strategy 2000, the Landfill Directive and other EU directives on waste	<p>This policy implies Borough level sufficiency and land allocation to ensure borough level compliance with directives, which may not be realistic and is at odds with both the rest of the document which is focused upon regional 'London wide' self sufficiency and with other signals from central and regional government which are for example allocating money on a regional basis predicated on joint working arrangements, e.g. the latest round of DEFRA's Waste Implementation Programme (WIP) funding which includes a 'strong element of partnership working'.</p> <p>Boroughs can only ensure that they allocate sufficient land resources if they liaise and communicate with their neighbours and if a regional or sub-regional approach to land use requirements in order to meet EU, national and regional targets is adopted. The wording contained within this policy statement needs to reflect this by giving further emphasis to the need for joint working and adding some explicit wording regarding the level at which implementation and compliance is required.</p>

Reference	Draft Alteration	Authority's Response
Policy 4A.1 Waste strategic policy and targets	This policy refers to the need to ensure that facilities are in place to manage 85% of waste arising with London by 2020.	The premise that London needs to be 'self sufficient' is understandable and supported by the Authority on the basis of minimising the environmental impact of waste transport and the declining availability of landfill, and increasing reluctance by surrounding counties to 'take other peoples' rubbish'. However, it needs to be recognised that London both produces, imports and processes material for the whole country, that a large number of commuters from across the south east come into London each day and generate waste whilst they are here, plus the competing demands on land use in London and the South East in general which make land values at a premium. There is no recognition or comment on this in the draft alterations or stated rationale regarding the 85% self sufficiency target in the main document and/or rationale for the deadline set. Further explanation would be helpful even if the target is retained. Some general comments from the Authority regarding the deliverability of the draft waste alterations to the London plan are included later in this document.
Policy 4A.1 Waste strategic policy and targets	This policy also notes the London Mayor's stated aim to increase waste minimisation, recycling and composting and the development of new and emerging advanced conversion technologies for waste.	Environmental impact should be the key issue in determining suitable outlets for material and by implication, technology choice. This is in relation to the whole system energy use and whole system emissions and releases. Whilst proximity and 'self sufficiency' are a consideration, they should not be the key issues.
Policy 4A.2 Spatial policies for waste management	There is a new bullet point which states that borough development plan documents (DPDs) policies should "require, where feasible, the re-use of surplus waste transfer sites for other	This policy will have implications for sites that are temporarily used for waste management e.g. prior to a planned redevelopment. Clarification is required regarding whether the policy applies to temporary sites. We suggest it should not, but note that the term 'temporary' will need defining.

Reference	Draft Alteration	Authority's Response
	waste uses"	<p>The spatial land use requirements outlined in the draft alterations to the London Plan, indicate that 112.7 hectares of land could be released for re-use from the re-use of existing transfer capacity for other strategic waste management and processing requirements. This represents 31.6% of the total estimated land-use requirements for strategic recycling and waste treatment facilities required between 2005 and 2020.</p> <p>This assessment of potential land-use release from existing transfer facilities may be unrealistically high. The draft alterations to the London Plan are based on the assumption that transfer station land will be released as transfer stations are no longer required for transferring waste to out-of-London landfill and can then be used to transfer recycle to out-of-London reprocessing.</p> <p>From experience in the Authority area, there is already considerable pressure on transfer facilities and any indication that they may no longer be required, not be ideally located or be under-utilised means that they are more likely to close and be used for other non-waste activities such as housing or retail activities, with replacement sites being immediately found and developed for continued use for waste transfer. The suggestion that nearly one third of the potential new land required to meet future waste management needs will come from the reuse and release of existing facilities including transfer stations in the Authority's opinion seems unrealistically high.</p> <p>In addition to the above, a proportion of the transfer sites are likely to be leased e.g. the rail transfer facilities with pressure on them to be used by the owner for other freight transport and/or other uses.</p>

Reference	Draft Alteration	Authority's Response
		<p>In addition, whilst a number of landfill sites have existing rail links to both London and non-London based transfer facilities, there are a limited number of rail-linked reprocessing facilities. This means that the potential reuse of existing rail linked transfer facilities to landfill to new uses as rail linked facilities to reprocessing, is unlikely to happen, at least to the extent that is proposed.</p> <p>In addition, the practical suitability of a rail-linked waste transfer station to become a rail-linked recyclables transfer station is questionable. For example, a transfer site used to transport trainloads of waste might be used to fill a train a couple of times a day as the station fills up with locally delivered mixed material. The same facility used for recyclates, either needs on-site sorting to bulk up a trainload of paper one day for example and then a trainload of glass another day, which will result in a requirement for a much larger land area or it would need to take pre-sorted material from a wider catchment to get economies of scale, but thereby increasing transport movements into the site.</p> <p>Finally, the timing of the release of transfer sites is not considered in the document. It is possible as London moves from a net exporter of waste for landfill disposal to a net exporter of recyclate for reprocessing that there will be a transition period when existing transfer facilities are being under-utilised for landfill transfer, but not yet available for recyclate transfer. Some mention of this would be a useful addition to the document.</p> <p>Alongside this, some further research into the potential timing of release, real availability and potential transition options for transfer facility re-use would be most helpful.</p>

Reference	Draft Alteration	Authority's Response
New paragraphs 4.10a – 4.10d	The new paragraphs reflect national planning policy in PPS10 Planning for Sustainable Waste Management and the requirements that this places upon the London Mayor in terms of planning for waste and the requirements to be included in the London Plan.	<p>The Authority supports the addition of references to PPS10 as these help to clarify how regional planning policy is helping to deliver on national policy requirements and the scope of the same.</p> <p>Whilst it was taken into account in the research conducted for preparing the draft alterations to the London plan, the document itself makes only limited reference to the 'quality' of land either released from waste transfer sites or required as new sites. The Authority suggests that further emphasis should be incorporated regarding the transport links of particular sites – particularly rail and water as this will help to prioritise both small local and larger strategic sites from a planning perspective. River or canal side sites in particular are likely to be under considerable pressure for housing and other leisure development and any further emphasis and guidance that can be given in the plan regarding the need to protect such sites would be welcome.</p>
<p>New waste policy 1: Existing provision – capacity, intensification, re-use and protection</p>	Boroughs should protect existing waste sites and facilitate the maximum use of existing waste sites, particularly waste transfer facilities and existing landfill sites. If for any reason an existing waste management site is lost to non-waste use, an additional compensatory site provision that normally meets the maximum throughput which the 'lost' site could have achieved, will be required	<p>The Authority supports the policy of protecting existing waste sites in London. The Authority also supports the need for compensatory site provision to be based on 'throughput' rather than land use.</p> <p>However, waste transfer facilities and landfill sites are specifically referred to in the policy guidance. The potential replacement of landfill sites once they are lost, e.g. following infilling and restoration is probably unlikely within London. It is therefore recommended that reference to landfill sites is omitted from the policy guidance attached to this new waste policy, given the unlikelihood of replacing landfill sites within the London boundary and also because filling a landfill is technically not a change of use. The 'loss' of a landfill to infilling is actually a completion of use, so this should not be viewed in the same way as the closure of a transfer site. In order to comply with the policy however the guidance could state that completed landfill facilities are replaced with sites for other ways for dealing with these residual wastes.</p>

Reference	Draft Alteration	Authority's Response
		<p>Clarity is also required regarding how this policy relates to temporary waste management arrangements. See response above. There needs to be flexibility where temporary arrangements exist and the loss to a non-waste use is planned for.</p>
<p>New waste policy 2: Additional land requirement for recycling and waste treatment facilities</p>	<p>243.6 ha of land is estimated to be required between 2005 and 2020 for new waste sites managing municipal, commercial and industrial waste, (16.2 ha per annum between 2005-2020), assuming 112.7 hectares is released from the re-use of existing transfer capacity and also over and above the re-use/intensification of existing sites).</p>	<p>The Authority supports the need to identify potential land take requirements to meet future strategy targets, but suggests that further work is carried out on likely spatial need. The basis for the calculations in the draft alterations to the London plan and the sustainability appraisal, suggest a relatively large number of small sites are identified and used between 2005 and 2020. Whilst we recognise that a range in terms of numbers of facilities has been noted in the accompanying documents and that facility numbers do not exclude the co-location of those facilities, it is the Authority's view that the number of facilities proposed is too large.</p> <p>In the Authority area we anticipate needing a smaller number of larger facilities than the plan suggests. For example, the draft alterations to the London plan suggest that just the 'North' sub-regional planning area will be required to have 51 new facilities for municipal, commercial and industrial waste. Across the whole of the North London WDA area (which includes an additional 3 Boroughs), the joint waste strategy suggests that 14 facilities will be required for municipal waste only during the same period. In other words the draft alterations to the London Plan suggest that North London needs nearly four times the number of sites than are identified in the North London Joint Wastes Strategy.</p>

Reference	Draft Alteration	Authority's Response
		<p>If the existing site requirements outlined in the draft alterations to the London plan are retained, then further clarification is required regarding how the sizing of facilities has been calculated. Have community composting sites for example been included in the assessment of land-use requirements for composting sites?</p>
		<p>No mention is made in this policy regarding a predisposition towards co-location of facilities – be that sorting and reprocessing for example or different types of waste treatment facility co-located on one larger site. A recent study tour under-taken by an Authority officer and Member involved visits to a number of MBT (mechanical biological treatment) plants for example, of which 2 out of 3 were co-located with landfill sites and the third, co-located with a sewage treatment works, landfill and incinerator. The Authority's existing contractor, LondonWaste Ltd. for example also has an incinerator, clinical waste treatment, sorting and bulking facilities for wood and other recyclables and an in-vessel composting plant on one site. More consideration is required in the draft alterations to the London plan of the likely deliverability (not just from a planning, but also a commercial perspective) of the strategy of a large number of small dispersed facilities.</p>
		<p>The Authority supports the principles of this policy. It would however be helpful from a planner's perspective if some mention was made of the prioritisation that might be given when ruling between the release of former industrial sites for housing compared to the release of employment land for waste facilities.</p> <p>The words "per annum" should be deleted from the first sentence of paragraph 4.10i as the land-use requirement of 244 ha which is quoted in the first sentence is for the full period 2005 to 2020, not the per annum amount.</p>

Reference	Draft Alteration	Authority's Response
<p>New waste policy 3: Numbers and types of recycling and waste treatment facilities</p>	<p>The policy requires London Boroughs to ensure that the above requirements can be met through making provision in their development plan documents and that these development plan documents should identify a range of waste management facilities to manage a capacity of 13.5 million tonnes municipal and commercial/ industrial waste.</p>	<p>The Authority supports this policy with the caveat that the numbers of facilities outlined in paragraph 4.10l be reconsidered. The impact of having a smaller number of larger facilities or increased co-location of facilities, so that aspects such as weighbridges can be shared is that the land requirements outlined in the draft alterations to the London Plan would be reduced.</p> <p>Paragraph 4.10m which outlines the balance that must be struck between the provision of a greater number of smaller, more local sites, which individually have a larger land take, and a smaller number of larger sites which may be spatially more efficient is useful.</p>
<p>New waste policy 4: Broad locations suitable for recycling and waste treatment facilities</p>	<p>Boroughs in their development plan documents should identify adequate provision for the scale of waste use identified. The broad locations for these facilities are:</p> <ul style="list-style-type: none"> • Strategic Employment Locations (Preferred Industrial Locations and Industrial Business Parks), • Local Employment Areas, and • Existing Waste Management Sites. 	<p>Whilst it is helpful to identify broad locations in the draft alterations to the London Plan, it is not very clear how the map showing potential locations and table 4A7 (which lists a number of potential sites) are related.</p> <p>The Recycling and Recovery Sites Investigation study which was used to appraise potential new waste sites only used a limited range of criteria developed in consultation with a small number of consultees. It did not, therefore, represent a detailed siting study, although we understand that a listing of the potential sites identified by the study is available on request. Further detailed identification of individual waste sites is a process that will need to be carried out by London Boroughs with planning judgement applied at the local level.</p> <p>The Authority recognises the tension in providing even a broad listing of potential sites as outlined in table 4A7 in a strategic document such as the draft alterations to the London Plan, but on balance considers that this is useful.</p>

Reference	Draft Alteration	Authority's Response
		<p>The seven Boroughs of the North London Waste Authority are working together to produce a Joint Waste DPD, for which the Authority and constituent boroughs would like Mayoral support. This process will identify sites for waste management on a sub-regional basis.</p>
<p>New waste policy 5: Construction and demolition waste</p>	<p>Boroughs should support new construction and demolition waste management facilities in London. There is no additional permanent new site provision identified up to 2020. However, the recycling of construction and demolition waste is encouraged at existing sites and aggregate extraction sites. Also, Boroughs should ensure, where practicable, that construction and demolition waste is recycled during construction on major development sites using temporary on-site mobile facilities. Developers are required to produce site waste management plans.</p>	<p>The Authority supports the policy if it relates solely to existing construction/demolition sites. It would not support the policy including household Re-use & Recycling Centres taking non-household construction and demolition wastes. Clarification is required of what is meant by 'existing sites'.</p> <p>Developers should be required in their site waste management plans to address the adverse environmental impacts of the on-site mobile recycling facilities. There may be instances where these mobile facilities are inappropriate because of the impact they would have on surrounding residential areas.</p>
<p>New waste policy 6: Hazardous waste</p>	<p>The Mayor will work in partnership with the Boroughs, the Environment Agency and industry to provide and maintain direction on the need for hazardous waste management capacity.</p>	<p>This is a London wide issue and will need to be considered as part of the Joint Waste DPD.</p>

Reference	Draft Alteration	Authority's Response
Minerals		
New minerals policy 1: Land won aggregates	<p>In response to Minerals Planning Guidance (MPG6) for aggregates provision in England (April 1994) London is required to make provision for an output of 1 million tonnes (mt) of land won aggregate per annum until 2016.</p> <p>This should be met by an apportionment of:</p> <ul style="list-style-type: none"> • 0.5 mt to East London (LBs Havering and Redbridge) • and 0.5 mt to West London (LBs Ealing, Hillingdon, Hounslow and Richmond-upon-Thames). <p>The guidance in MPG6 is aimed at mineral planning authorities and the minerals industry in relation to how to ensure that the construction industry receives an adequate and steady supply of aggregates at the best balance of social, environmental and economic cost and in accordance with the principles of sustainable development. For London there is a requirement that a minimum land bank of seven years output should be maintained in London. Boroughs with reserves outside the apportionment areas should consider proposals for extraction in line with policies in the Plan.</p>	<p>This policy does not have a direct impact on the Authority. The policy states that the provision of aggregates in London can be met from reserves in East and West London. The Authority supports this policy which reflects the option identified in the sustainability appraisal for less aggregate extraction and higher rates of re-use of construction and demolition waste.</p> <p>It is noted that the potential for additional new extraction in the Lea Valley is mentioned in the consultation document, but not quantified.</p>

General Comments

In addition to the above, the Authority would like to add the following comments:

1. The Authority questions the deliverability of the plan on the basis that 331 facilities with a land take of 16.2 hectares per year across London is a considerable challenge. The report above has already highlighted the issue.

2. The plan is based on the premise that London's current performance on recycling is poor and that therefore a large number of new facilities are required both to meet recycling targets and improve self sufficiency. However, London's performance should be compared with other metropolitan authorities rather than with authorities with a mix of metropolitan and rural areas to gain a more accurate measure of relative performance and it is noted above that environmental impact should be the key issue, rather than proximity.
3. Thirdly, the Authority questions why the Southern sub-regional planning authority area is not 'allocated' any of central London's waste and therefore is not required in the draft alterations to the plan to make land-use provision for new facilities to manage this additional material.
4. Fourthly as also outlined above in a number of places, clarity over the scope of the plan is required, particularly in the light of the fact that the Mayor's Municipal Waste Management Strategy, covers municipal waste only, whilst the London Plan is planning for wider wastes too. At some points in the consultation and supporting documentation, construction and demolition waste are included and in some cases this waste stream appears not to be. Additionally there is a lack of clarity regarding planning for hazardous and agricultural waste. Any targets and facility plans should make clear reference to the scope.
5. Finally, the Authority's own best practical environmental options assessment for the North London Joint Waste Strategy, Mayor's Draft, September 2004, showed that partnership working rather than a borough led approach to waste was the most beneficial approach from a sustainability perspective.

Report Ends