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16th March 2016

BY EMAIL

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Dear Sir

North London Heat and Power Project EN010071; written representation from North London Waste Plan (reference: 10031948)

The seven North London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest (“the Boroughs”) are working together, as waste planning authorities, to produce the North London Waste Plan (NLWP). The NLWP will cover the period 2017 to 2032 and, once adopted, it will form part of the statutory Development Plan for these areas.

The Boroughs as waste planning authorities are submitting these comments to give some waste planning context for the Development Consent Order (DCO) for the North London Heat and Power Project (NLHPP) promoted by the North London Waste Authority (NLWA). However, I understand that individual boroughs may comment separately on the DCO proposals, having regard to specific details and any potential impacts for their areas. Therefore, this response is without prejudice to any views expressed individually by boroughs in their broader role as local planning authorities.

The Inspector has asked a question (2.2) relating to the present position of the NLWP and how the proposed development is consistent with or conflicts with the NLWP as it currently exists. The first part of this written response updates the Inspector on NLWP progress to date and the timetable, the second part highlights areas of consistency and conflict with the DCO.

Present position of the NLWP

The purpose of the NLWP is to ensure there will be adequate provision of suitable land to accommodate waste management facilities of the right type, in the right place and at the right time up to 2032 to manage waste generated in North London; and to provide policies against which planning applications for waste development will be assessed, alongside other relevant planning policies/guidance. The NLWP plans for seven waste streams, including

Local Authority Collected Waste which will be managed entirely by the NLWA. The NLWA is therefore an important stakeholder and partner in delivering the aims of the NLWP.

The National Planning Policy for Waste (NPPW) no longer explicitly requires the Plan to have regard for the requirements of the local Waste Collection/Disposal Authority as was the case with its predecessor Planning Policy Statement 10 (PPS10). Nevertheless, in order to achieve the outcomes stated in para. 1 of the NPPW it follows that the NLWP should take account of the strategy and infrastructure programmes that the NLWA is pursuing as the Authority has the statutory responsibility for dealing with Local Authority Collected Waste (LACW).

The Boroughs started on a new version of the NLWP with a “launch consultation” in 2013. A report of the launch consultation can be found on the NLWP website. The Boroughs consulted on the draft NLWP under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 between 31st July and 30th September 2015. They are now preparing the proposed submission version (Regulation 19) and will publish it for representations to be made in the summer/autumn of 2016. Submission will be in the winter of 2016/17 with adoption expected in the winter of 2017 (December).

Evidence gathering has been going on since 2013. The NLWP Waste Data Study was published in 2014. The Waste Data Study provides a detailed analysis of current waste arisings in North London for all waste streams and waste movements in to and out of the area. In addition the Study provides detailed analysis of capacity gaps for each type of waste management route and future capacity requirements for each waste stream as well as looking in more detail at each of the existing waste sites in North London.

A NLWP Waste Data Study Update was published in July 2015 as part of the consultation on the draft NLWP. The Boroughs are currently working on a further update of the Data Study to be published in July 2016 as part of the consultation on the proposed submission NLWP. At each stage the Data Study has been updated to enable the draft NLWP to be based on the best available evidence. The revisions take account of updated information on waste arisings, waste management and cross boundary movements.

In the NLWP Waste Data Study the Boroughs have used the waste projections for LACW undertaken by the NLWA. The 2014 NLWP Data Study used the projections for LACW that were part of the previous NLWA procurement. For the DCO application, the NLWA appointed consultants Eunomia to undertake forecasting of growth in LACW to inform the capacity requirements of the new facility at Edmonton and its implications for the future management options. The revised NLWP Data Study published in 2015 and the version to be published in 2016 uses the NLWA arisings forecast in the Eunomia report in order that the NLWP is consistent with the NLWA’s current plans. In the current update (2016) the opportunity has been taken to iron out discrepancies in how waste is modelled between the NLWP and the NLWA, particularly relating to trade waste.

The key elements of the draft NLWP which went to public consultation are the Aim and Objectives, the Spatial Strategy, the Provision for North London’s Waste to 2032, the policies and new locations for waste facilities. The draft NLWP considers a range of options

for future waste management. The Boroughs are proposing a Growth Option aligned with the GLA's modelling which has been independently tested through the London Plan and a management option of maximised recycling that aligns with European Union, national, regional and local targets. The preferred approach to future waste management in North London is to manage the equivalent of all LACW, C&I and C&D waste generated in North London, while recognising that some imports and exports will continue (net self-sufficiency). The draft NLWP referred to the current activity and future plans of the NLWA. Section 7 the draft NLWP sets out the approach of the plan to the main waste streams and management methods while in section 8 the draft NLWP contained a description of the proposed strategy of the NLWA including the facilities and their capacity included in the DCO. One of the policies in the draft NLWP concerned the need for and the siting of Resource Recovery Centres which are mainly run by the NLWA.

The North London Boroughs consulted on the draft NLWP between 30th July 2015 and 30th September 2015. Notification was sent to individuals and organisations on each borough's planning databases and on the NLWP's own database. The Draft Plan provided the first opportunity for stakeholders to make comments on the strategy for future waste management in North London, potential locations for new facilities across the area, and policies. A total of 213 representations were received. The Boroughs have published the [Interim Report on the Draft Plan Consultation](#) which sets out who was consulted, summarises the outcomes of the consultation events, and lists comments received by both representor and section of the plan. It also sets out action points for the next stage of developing the NLWP.

As part of the previous call for sites, the NLWA put forward a site at Pinkham Way for consideration. More recently the NLWA made representations on the draft NLWP and these are being considered as part of the work on developing the proposed submission version. Their representations generally were about the wording of parts of the document and the requirements faced by developers of waste facilities, some of which the NLWA consider onerous. There were no objections to the main strategy of the plan.

Very few of the representations received by the NLWP during consultation related to the proposed strategy of the NLWA and there was no objection to the proposed development that is part of the DCO.

Consistency and conflict with the NLWP

The NLHPP is broadly consistent with the policies and strategies in the emerging NLWP. The proposals for the NLHPP meet a number of key elements of the NLWP spatial strategy in that the NLHPP make use of an existing site, encourages co-location of facilities, provides opportunities for decentralised heat and energy networks, and reduces exports of waste. In addition, the NLWP and the NLHPP are both predicated on the achievement of a 50% recycling target by 2020 and other statutory targets.

If the NLHPP proposal had come forward after the NLWP was adopted, it would have needed to satisfy the requirements set out in Policy 6: Assessment Criteria for waste management facilities and related development. This policy raised a number of objections

from the NLWA in relation to design and the mitigation of impacts resulting from new development. The Boroughs expect to work with the NLWA to come to a sensible resolution of almost all the issues raised in the representations made by the NLWA to the draft plan.

As mentioned above, both the NLWP and the DCO application are using the same projections (from the Eunomia study) for Locally Authority Collected Waste, so there is no difference in terms of waste data and projections. This means that the NLWP is relying on third-party data for part of its modelling for projections. It should be noted that the Eunomia study model is based on gross disposable household income. This is a different methodology to the rest of the NLWP model which is based on known population and economic growth forecasts. The NLWA and the North London Boroughs have co-operated in identifying and resolving any disparities arising from this difference in approach to modelling.

Yours sincerely

A solid black rectangular box used to redact the signature of Archie Onslow.

Archie Onslow
Programme Manager