

THE NEW NORTH LONDON WASTE PLAN



Have your say on what should be in the new plan – Important we all comment

Deadline: 7 June 2013

Send your views to: feedback@nlwp.net or by post to Archie Onslow
North London Waste Plan Camden Town Hall Argyle Street London WC1H 8EQ

The boroughs will use these initial comments to help draw up a draft new waste local plan that they expect to produce in 2014. There is no document that we are being asked to consider. That will not appear until summer 2014, when there will be a formal consultation.

What we think should drive the new plan

Forecasting:

Circumstances in waste have changed radically. Rather than it being a problem of end-disposal, waste is now regarded as a store of resources for re-use,. Therefore, a much broader approach is needed. Views should be sought from industry (eg Coca Cola, M&S, John Lewis, B&Q etc), about the current and proposed policies on waste prevention and management in their organisations. Small and medium sized waste operators in the UK (particularly in London) should be asked about their current operations, their existing capacity and plans for increasing/reducing capacity.

The figures in the London Plan 2011 are now way out of date and we think are not a good starting point for forecasting future trends. It is unrealistic to forecast too far into the future Waste forecasts should be based on best evidence available.

The plan should be written to be understood; the previous plan failed to give that impression.

We need a fresh plan – not a rehash of the previous plan

This is a quote from the recent letter from Archie Onslow, the officer in charge of the NLWP.
“When the boroughs submitted the NLWP, they believed it to be “sound” – that is, in accordance with the relevant tests. The Inspector halted the examination and never went on to consider issues of soundness at the examination. The boroughs therefore consider that the information generated through the preparation of the submission NLWP is a useful starting point from which to develop the new plan. Representations made throughout the preparation of the NLWP will also help inform the work on the new plan. All previous stages of the NLWP are still available to view at www.nlwp.net.”

Points we would like to make

- Public examination of a plan starts from the premiss that it is sound; it is up to any objectors to show otherwise. It is true that because the hearings last June were suspended so early, the soundness of the plan was not tested, but the further inference, that this therefore shows the plan itself was sound, is specious.

- Previous objections need to be taken into account when considering previous data, otherwise next summer's consultation will be a waste of time and money, as the document will simply be picked apart in the same unrelenting way as the failed plan. As many of you know, the data and evidence was vigorously challenged by several of the participants, including us. Our previous submissions are available here ([Link](#)).
- The time period covered by the plan should be realistic and clear. The plan should not reach conclusions about anything beyond the end of that period. While the plan is obliged to take waste authority's needs into consideration (the NLWA plans go out to 2043), these should not have the overweening influence that was all too obvious previously.

SITES & SITE ASSESSMENT

- No site should be considered for inclusion in the plan before a report setting out the impact of doing so, and covering all the planning implications for the borough concerned, has been considered by the relevant local planning authority at committee level. As far as Pinkham Way was concerned, this didn't happen last time.
- The 'sequential test' should be strictly applied – this is in effect a series of conditions to be met before a site can be allocated for waste. Thus if a site is unallocated, ie not already licensed for waste, it goes through the tests set down for unallocated sites before it can be considered further.
- So-called 'brownfield', or previously developed land (PDL), is usually preferred for development. Pinkham Way has not been in use for 50 years. The amount of natural regeneration over that time excludes it from these classifications (both London Plan and NPPF definitions exclude it).
- Whether land is brownfield/ PDL should be a criterion in what is known as the 'primary sift'. The 'primary sift' is the term given to the first set of site selection and assessment criteria. If a site fails one of these criteria, that is a 'showstopper', and the site is automatically excluded.
- In the previous plan, environmental criteria in the 'primary sift' included 'Local Environmental Classifications (allotments, green belt, green chains, green corridors etc)'. Sites of Importance for Nature Conservation (SINCs) were initially included in this list, and subsequently omitted, so allowing the Pinkham Way site through. SINC is an environmental classification; its omission is irrational and it should be reinstated.

Site Scoring

- In the 'secondary sift', sites are assessed on a further series of factors, marked up to 5 if a site meets a criterion. It is logical that, if a site does not fulfil a criterion in any sense, there should be a score of 0. In the previous plan this didn't happen; the lowest score was 1.
- As you may know, some criteria regarded as important in an assessment were 'weighted'; a multiplier was applied to any score achieved to reflect that importance. Thus it was possible for a site not to meet a criterion in any way, and yet, if the criterion was weighted, the existing illogical score of 1 was actually increased! This is dishonest.
- Environmental impacts, eg noise, odour, congestion, should be assessed individually, and not lumped together as a single impact as they were previously. The volume of potential waste proposed for any particular site should also be assessed.
- The previous plan saw several criteria which overlapped, ie they covered a lot of the same ground about access, proximity to major roads and 'vehicle routing'. This is not desirable.
- The potential benefits of mitigation of environmental impacts should not be assessed as though that mitigation has already been successfully implemented. (It is self-evident that the results of

mitigation can only be assessed in hindsight, eg if trees which are planted in mitigation for the loss of existing trees die after a few years, the mitigation effect is nil.)

- Negative factors should be scored as negative numbers, which is a more transparent method rather than giving them low positive scores.

THE WASTE HIERARCHY AND RECYCLING

- The Waste Hierarchy is a pictogram (Link to Waste Hierarchy) illustrating the desirability of different forms of waste treatment. The top 'layer' is Prevention, ie the waste shouldn't arise in the first place, followed by Reduction/ Reuse, and so on; the bottom is Disposal. Appreciation of the Hierarchy should be actively at the centre of the new plan.
- The EU Roadmap for Resource Efficiency 2050 (link) is a determined long term push within the EU towards a low carbon economy; the UK pledge to reduce emissions by 80% by 2050 is linked to it. Within it, waste is viewed, as we say above, as a rich source of renewable resources, ie all waste management should aim at moving further 'up the Hierarchy'.
- It's our view that there is no option about this. The councils need to take the lead. The Roadmap also sets shorter term Milestones for 2020. That for Waste says: *"By 2020, waste is managed as a resource ... More materials, including materials having a significant impact on the environment and critical raw materials, are recycled."*
- This Milestone is a good starting point. Over the 10-15 year life of the next plan, recycling will rise and residual (black bag) waste fall. Whoever forms the next government is likely to raise the English recycling level to match the 70% target for 2025 in Scotland and Wales as Labour has already indicated.
- The plan needs to encompass this continuing trend and its effect on different forms of waste treatment, and how it will affect site selection and land requirements in terms of the need for smaller recycling/ re-processing plants dealing with individual waste streams.

Further information about the NLWP can be found at <http://www.nlwp.net/>

