

Dear Sirs,

In response to your letter of 19th April 2013 requesting representations on matters relating to the new local plan for waste in North London, I have the following comments:-

Firstly, it is dangerously complacent, in view of the evidence already presented to the contrary, for the seven boroughs to continue to believe that the submission NLWP is sound, or that the information generated though its preparation is a "useful starting point" from which to develop the new plan. It is inconsistent for the boroughs to claim that the unexamined Plan is "sound" because the objectors' cases have not been examined, and also to say that "representations made throughout the preparation of the NLWP will also help to inform the work on the new plan" since the submission NLWP did not show very much sign of having taken into account those same representations. Clearly by this stage also, the information generated in the preparation of the submission NLWP is now completely out of date. It is essential to start with a clean slate and therefore in my opinion you need to go back to the beginning of the information-gathering process with a new framework, new criteria and information recording methods.

Secondly, as mentioned above, I note that representations made throughout the preparation of the submission NLWP will be considered in working on the new plan. However, the fact must also be taken into account that consultations on earlier versions of the Plan failed (for whatever reason) to adequately include the residents of the southern part of Coppetts Ward immediately adjacent to Site 121 (Pinkham Wood aka Friern Barnet former Sewage Treatment Works), whose representations are therefore absent. This criticism may well apply to other sites proposed for waste use in the submission NLWP.

Thirdly, I object to the claim in the last sentence of the third paragraph of your letter, that the plan is intended to provide a framework for planning decisions relating to waste facilities and will contain policies to be used when the boroughs assess planning application for such facilities. It appears to me that this is intended to facilitate the progress of planning applications for waste uses by NLWA to the relevant borough and will interfere with the individual borough's freedom of action in the planning decisions they may make. No fetter on the free operation of individual planning departments in the member boroughs can be accepted, as this would prevent the objective consideration of the merits or demerits of any particular planning application by NLWA in relation to any particular site.

Fourthly, I am very much against the proposed entry by NLWA into long term contracts (which will last longer than the lifetime of the Plan when adopted) in relation to the management of waste in North London due to pressure from international commercial waste management organisations. This will lead to inflexibility in a field where technology is developing fast and thus tend to inefficiency. Short terms contracts would enable the NLWA to move with the times and adopt new more efficient methods of waste management quickly as well as making it more possible for smaller local contractors to compete for the work. This would also benefit the local economy in North London in a way which will not occur with the awarding of contracts to large international groups who may well be adept at moving their profits overseas in such a way as to avoid having to pay their proper share of tax in this country.

Dealing with the numbered points in your letter on which you specifically invite comments, I would respond as follows using the same numbering as in your letter :-

- 1. The content of the local waste plan.** The new plan should contain a Statement of Community Involvement and particularly set out how consultations have been publicised and brought to the notice of residents living within, say, a radius of one mile from any proposed new sites proposed for waste purposes.
- 2. The need for new waste facilities.** Considering the up to date projections for future waste arisings in North London and statistics on the current proportion of the individual potential of existing waste facilities in North London actually being used at the present time, it is my opinion that no new waste facilities will be required in the next ten to fifteen years. What is required is improvement of the efficiency of the existing waste facilities to enable them to handle waste in a more satisfactory manner.
- 3. The characteristics of a site suitable for waste use.** As above, I do not consider that any new waste facilities are required. However, if they were required, I do not consider that the site criteria and assessment method in the submission NLWP were suitable and therefore they are not "a useful starting point", and could be improved upon. In particular, the site criteria and assessment method do not seem to have been applied

uniformly to all sites, and this should be guaranteed, and the application of the criteria and method to individual sites to explain the scores awarded to each site should be made clear in each case.

4. Proposals for waste sites. No.

5. Policies. I do not think that the planning policies of the submission NLWP are a useful starting point, since they led, for example, to the identification of Pinkham Wood as a suitable site for one of the largest waste treatment plants in Europe within metres of densely populated residential areas, schools and other vulnerable residents, and adjacent to the A406 in a locality where the air quality is already persistently below that identified by the EU as healthy for humans. I understand that the residents of the southern area of Coppetts Ward, east of Colney Hatch Lane, have the lowest life expectancy of the whole of the borough of Barnet and yet the further pollution of the air as a result of the originally proposed MBT on the site appears not to have been taken into account in the planning policies of the submission NLWP."