



Response to Consultation on Draft North London Waste Plan

Sustainable Hackney is a membership organisation for individuals and organisations interested in making a local contribution to global issues of sustainability. As an umbrella group we aim to influence policy and represent views to the local authority and other organisations and to increase co-operation between such organisations and local environmental groups. For more information see our website <http://sustainablehackney.org.uk>

We have invited comment on this response and it has been approved by our steering group.

We support many of the objectives of the plan, especially:

- Net self-sufficiency in waste for the NLWP area.
- Virtually eliminating landfilling of household waste.

We think the plan is flawed for the following reasons:

- It misses the opportunity to provide land for prevention and re-use, options that are at the top of the waste hierarchy.
- We don't think the plan lives up to the objective of net self-sufficiency as it envisages increasing amounts of excavation waste continuing to be landfilled outside the NLWP area.
- The NLWP proposes as "most suitable" a number of sites and areas for waste use that the area and sites appraisal classifies as "possibly suitable with significant mitigation issues to address". We don't agree that these sites and areas are the "most suitable".
- We think the plan should include a strategy for reducing imports and exports of waste as well as net self-sufficiency.
- No evidence is presented to support the assumption of future growth in waste arisings, indeed household waste arisings have been flat since 2008 despite a rising population.
- The forecast for waste arisings (used to identify capacity gaps) is inconsistent with research by Eunomia and inconsistent with the NLWP recycling targets.
- Some of the capacity gaps disappear if Edmonton would accept commercial and industrial waste. No rationale has been presented why this is not possible.
- No analysis is presented to show that the 16ha of additional land could not be provided within existing waste sites or those which are most suitable for waste

use. There should be an appraisal of different options for meeting the needs for waste facilities, for example:

Option 1. Existing sites only. Can the needs identified be met using land within existing safeguarded sites only?

Option 2. Existing sites plus selected sites in Band B. Can the needs identified be met by existing safeguarded sites plus additional waste sites selected to meet specific objectives (eg Re-use and Recycling Centres).

Option 3. Existing sites plus all sites in Band B.

This approach would minimise the amount of land needed and the potential impact while being proportionate and justified.

- The allocation of 354ha of land for waste use, much of which is only marginally suitable, in response to a need of 16ha is grossly disproportionate and not justified.

Question 1: Do you agree with the proposed Aim for the draft NLWP? If not, please suggest an alternative

No, the aim is not ambitious enough. The aim should include achieving net self-sufficiency and management of materials at the top of the waste hierarchy including prevention and preparation for re-use.

- Replace “work towards achieving” with “achieve”.
- Replace “as far up the waste hierarchy as practicable” with “eliminating disposal to landfill, and maximizing economic and environmental benefits by emphasizing options at the top of the waste hierarchy including prevention and preparation for re-use”.

Question 2: Do you agree with the proposed Draft Objectives for the draft NLWP? If not, please suggest an alternative and/or additional objectives.

We are disappointed that the plan does not recognize the opportunity to provide space to develop prevention and re-use facilities such as remanufacturing, community repair, refurbishment and reuse.

- SO1 replace “as far up the waste hierarchy as practicable” with “eliminating disposal to landfill, and maximizing economic and environmental benefits by emphasizing options at the top of the waste hierarchy including prevention and preparation for re-use”.
- SO3 replace “work towards” with “achieve” delete “as much as practicable”.
- SO8 Delete “where possible”.

Question 3: Do you agree with the draft spatial strategy for the NLWP? If not, please provide further detail and any alternative approaches.

A. Make use of existing sites and identify the most suitable new sites/areas.

We agree with the aim, however we note that this element of the spatial strategy does not include any definition of how the “most suitable” new sites and areas will be selected. We propose the following approach which is proportionate and justified.

In the site and areas assessments potential sites are classified as follows:

Band	Description
A	Site is highly suitable for waste uses with only minimal mitigation required
B	Site is suitable for waste uses following appropriate mitigation
C	Site is possibly suitable for waste uses although there are significant mitigation issues to address
D	Site is not suitable for waste uses

Sites in band D have already been eliminated from further consideration.

We think that the “most suitable” sites to take forward will be those in bands A and B.

Sites and areas in band C should not be taken forward as they are “possibly suitable” ie they are not “most suitable”.

- B. We question the need for a network of sites. While it is true that sites have in the past been located in the east of the NLWP area and a greater spread of sites could reduce the need for road transport the objective of net self-sufficiency will in itself make a substantial contribution to this goal. We agree with the objective of ensuring residents have good access to Re-use and Recycling Centres. If land is to be provided for repair, refurbishment and remanufacturing sites then a local network of sites close to communities that they serve could be justified.
- C. We support the principle of co-location of facilities. This is consistent with using existing sites as much as possible.
- D. We support the principle of local heat networks. However, we question the extent to which decentralisation can be combined with energy from waste. The large capital costs of energy from waste facilities tend towards centralization, as at Edmonton. We are also not convinced that energy from waste is the best environmental option and would like to see further consideration of options such as MBT/AD.
- E. We agree with the aim of reducing impact on local amenity. This is consistent with using sites in bands A and B.
- F. Support Sustainable Modes of Transport. The objective of net self-sufficiency will itself have a substantial impact on the need for road transport. We note that providing Re-use and Recycling centres closer to local communities would also reduce the amount of road transport by members of the public in bringing waste to such sites.

G. We support the objective of reducing exports of waste. However, we think the plan is incomplete without a strategy for reducing cross-border movements (imports and exports) of waste.

Question 4: Do you agree with the NLWP taking forward the Preferred Options of Option B: Growth, Option II: Maximised Recycling to meet Option 3: Net self-sufficiency for LACW, C&I and C&D waste streams? If not, please state why and suggest an alternative option.

- Option B. We are disappointed that a growth option has been selected. We understand that a no growth option is inconsistent with the London Plan. However, the waste data study shows that household waste has remained broadly static since 2008 despite significant increases in the NWLP area population. The data study does not present any evidence of growth in arisings of C&I or C&D waste. We think a more in-depth study is needed to identify trends in arising per head and per job before choosing a scenario. We also believe the potential for a shift of emphasis and resources towards waste prevention and re-use has not been properly explored.
- Option II. We are disappointed that after 2020 it is assumed that household waste recycling levels will stick at 50%. We believe there is potential for further increases to European best-practice levels. We note, for example, that recycling rates already exceed 50% in Germany, Belgium, Austria, Switzerland and Netherlands.
- Option 3. Net self-sufficiency. We support the option. However the NLWP envisages exports of increasing amounts of excavation waste, so we don't believe the strategy achieves the objective. We believe that a strategy should also be developed to minimise cross-border movements (imports and exports).

Question 5: Do you agree with how waste management needs will be met as set out in 'Provision for North London's Waste to 2032'? If not please suggest alternative an approach.

The NLWP identifies 16 ha of land needed for additional waste management facilities needed to achieve net self-sufficiency based on the forecast of arisings derived from the preferred options and the forecasts of waste capacity. As noted above we have questions about the preferred options.

However there also seem to be issues with the forecast waste arisings that render the analysis of the capacity gaps suspect:

1. Arisings: See Appendix 2 to the Data Study Update Part 2 Arisings (Management Requirements).
 - Baseline LACW arisings of 805,000t in 2013 are used despite a Eunomia study which put this figure at 724,000t. The higher figure is modelled so that it is "consistent with NLWA's current plans" rather than the facts.
 - The LACW landfill tonnage drops from 80,000t to 2,000t in 2017, with no concomitant increase in recycling or EFW.

- C&I baseline arisings of 946,000t appear to include 32,000t of C&D Recycling. The target of 75% C&I recycling is only met by including this amount (35,000tpa).
- Projected recycling rate for LACW is only 47% This is inconsistent with Option II. (target 50% recycling)
- Projected recycling rate for C&D waste is 92%. This is inconsistent with Option II. (target 90% recycling)

2. Capacity: See Appendix 2 to the Data Study Update Part 2 Capacity Gaps.

- A gap in EFW capacity for Commercial and Industrial Waste is identified of 62,000 tonnes in 2013 rising to 100,000 tonnes by 2031. The same table shows surplus capacity for EFW Local Authority Collected Waste of 62,000 tonnes rising to 274,000 tonnes by 2031.
- It would therefore appear that the additional capacity for EFW for C&I could be provided by accepting C&I waste at Edmonton EFW plant. No explanation is given why Edmonton does not accept C&I waste. This would reduce the amount of land required from 16 to 12 hectares.
- This policy needs to be justified before this capacity gap is taken forward.

Question 6: Do you agree that the above described methodology used to identify potential sites and areas for future waste development is justified and proportionate? If not why not? Please provide an alternative approach.

- The methodology used is flawed. A total of 354 ha of sites and areas are identified to meet a need of 16 ha of land. This is grossly disproportionate and not justified.
- There is no analysis provided in the NLWP of whether the required land could be provided within existing sites, and how to meet the needs while minimising adverse impacts. This would be a proportionate and justified plan.
- A lot of the sites proposed are “possibly suitable” and have significant mitigation issues. These sites should not be included as they are not the “most suitable” sites (element A of the spatial strategy).
- There should be an appraisal of different options for meeting the needs for waste facilities, for example:
 1. Option 1. Existing sites only. Can the needs identified be met using land within existing safeguarded sites only?
 2. Option 2. Existing sites plus selected sites in Band B. Can the needs identified be met by existing safeguarded sites plus additional waste sites selected to meet specific objectives, and to minimise the impact.
 3. Option 3. Existing sites plus all sites in Band B.

Question 7: Do you know of any existing waste facilities which are not included in Schedule 1 in Appendix 1? If so, please provide details.

The sites in Hackney which are already safeguarded for waste use are:

Hackney Sites	Area HA	Facilities	Band
A15-HC Millfields LSIS	2.10	Integrated resource recovery	A
A16-HC Hackney Downs	0.55	Recycling	C
A17-HC Mare Street	0.46	Recycling	C

Hackney Downs and Mare Street should not be taken forward as they are “possibly suitable” and not the “most suitable” sites as defined in element A of the spatial strategy.

Question 8: Do you agree with the draft policies for development on new sites and areas? If not, please provide reasons why and suggest an alternative

In the absence of the analysis and option appraisal we have called for above we don’t accept that there is any need for additional sites and areas.

We consider policies 2 and 3 are unsound because the need for them is not based on evidence.

Hackney Sites	Area HA	Facilities	Band
S03-HC Eagle Wharf Rd	0.52	Recycling, Waste transfer	C
A14-HC Theydon Road	4.30	Recycling, Waste transfer	C
A18-HC Oak Wharf	1.50	Integrated resource recovery, waste transfer	C
LLDC1-HC Bartrip St	0.60	Recycling, Waste transfer	C
LLDC2-HC Palace Close	0.33	Recycling, Waste transfer	C

None of the sites and areas in Hackney which are identified should be taken forward as they are “possibly suitable” and not the “most suitable” sites as defined in element A of the spatial strategy.

Question 9: Do you have any comments on the accuracy of the details in the sites and areas proformas in Appendix 2? Do you have any additional sites or areas you wish to put forward for consideration?)

No comment

Question 10: Do you agree with the inclusion and provision of the policy on unallocated sites? If not, please provide an alternative approach.

No comment

Question 11: Do you agree with the locations identified as being in need for new Re-use & Recycling Centres?

Yes

Question 12: Do you agree with assessment criteria for waste management facilities and related development? If not, please suggest alternatives

No comment

Question 13: Do you agree with the proposed approach to Energy Recovery and Decentralised Energy? If not, please suggest an alternative.

Yes

Question 14: Do you agree with the proposals for monitoring the NLWP and the roles and responsibilities of the bodies involved in implementing it? If not, please state why and suggest an alternative.

No comment

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