



# **Interim Report on Draft Plan Consultation**

**January 2016**

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## 1. Introduction

- 1.1 Seven London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest ('The North London Boroughs') are working together as planning authorities to prepare the North London Waste Plan (NLWP).
- 1.2 The NLWP will set out the planning framework for waste management in the North London Boroughs for the next 15 years. It will identify sites and areas suitable for waste facilities and set out policies for determining waste planning applications.
- 1.3 Under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the North London Boroughs consulted on the Draft North London Waste Plan ("Draft Plan") between 30<sup>th</sup> July 2015 and 30<sup>th</sup> September 2015; a period of nine weeks.
- 1.4 Consultation on the NLWP was undertaken in compliance with the Planning and Compulsory Purchase Act (2004) and The Town and Country Planning (Local Planning) (England) Regulations 2012, and in accordance with the NLWP Consultation Protocol 2014 and borough Statements of Community Involvement (SCI).
- 1.5 This Consultation Report sets out who was consulted and how, summarises outcomes of the consultation events, and lists comments by both representor and section of the plan. It also sets out action points for the next stage of developing the NLWP.

## 2. Previous Consultation

- 2.1 In April-June 2013, the North London Boroughs invited representations about what the NLWP ought to contain. A [Report of the NLWP Launch Consultation](#) is available online.
- 2.2 A full [Consultation Statement](#) on the 'launch consultation' was made available during the Draft Plan consultation and is available on the NLWP website. This sets out a complete list of consultees who were invited to make representations, launch letter, the list of representors, a summary of the main issues and how representations have been taken into account.
- 2.3 After the launch consultation, a series of three Focus Group events were held on 25th March, 3rd June and 1st July 2014. A record of the sessions is available in the [Report on Focus Group Events](#).

## 3. Draft Plan Consultation

- 3.1 The Draft Plan consultation took place over a nine week period during 30<sup>th</sup> July 2015 to 30<sup>th</sup> September 2015. 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.

3.2 Emails or letters were sent to each of the general and specific consultation bodies<sup>1</sup> and to all individuals and groups who had registered their interest in the NLWP. Additionally, each borough contacted other appropriate businesses, organisations and people in the local area through their consultation databases. A total of 6,707 individuals were notified of the Draft Plan consultation and over 5,050 organisations and public bodies were notified. A copy of the letter/email is available at Appendix C.

3.3 Letters were also sent to properties within a 150m radius of those sites and areas not designated as Strategic Industrial Land (SIL) or Locally Significant Industrial Sites (LSIS) in borough Local Plans. The 150m radius was identified as the maximum consultation distance required by Borough Statements of Community Involvement. Notifications were sent to a total of 7,577 addresses. A copy of the letter/email is available at Appendix D.

3.4 As well as inviting general comments, the consultation posed a number of questions on each part of the Draft Plan. These are set out in section 5 of this report.

#### **4. List of Representors**

4.1 A total of 213 **representations** were received from individuals (145), community groups (16), industry/business (10), political groups (5) and statutory consultees (36).

4.2 One petition was received, signed by 919 local residents. The submission by Pinkham Way Alliance was supported by 1,067 signatories.

4.3 The following bodies and persons made representations at the Draft Plan consultation:

##### **Individuals**

145 representations from local residents

##### **Petition against Theydon Road**

Petition signed by 919 people

##### **Community Groups (17)**

Angel Wharf Residents' Association (AWRA)

Beis Malka School

Elder Court Residents Association

Freehold Community Association

London Cycling Campaign

Mill Hill Neighbourhood Forum

Mill Hill Preservation Society

Mill Hill Residents Association

Pinkham Way Alliance (PWA) (1,067 signatories)

Springfield Community Primary School

Sturt's Lock residents (10 signatories)

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<sup>1</sup> Identified in 2.(1) of the Town and Country Planning (Local Planning) (England) Regulations 2012

Sustainable Hackney  
The Barnet Society  
The Commercial Boat Operators Association (CBOA)  
Tottenham and Wood Green Friends of the Earth  
Watermint Quay Residents Association  
West Hampstead Amenity and Transport Group (WHAT)

**Waste industry / Business (10)**

Avon Group of Companies  
Bestway Holdings  
Brent Cross Cricklewood Development Partners  
Bywaters (Leyton) Ltd  
DSN Limited  
Eddora Holdings Ltd  
KTI  
Mcmz services ltd  
Metal and Waste Recycling Ltd  
SITA

**Public Bodies (36)**

Bedfordshire Authorities  
Buckinghamshire County Council  
Cambridgeshire County Council  
Canal & River Trust  
City of London Corporation  
East London Boroughs of Barking and Dagenham, Havering and Newham  
East of England Waste Technical Advisory Body (EoEWTAB)  
Environment Agency  
Epping Forest District Council  
Essex County Council  
Greater London Authority (Mayor of London)  
Hampshire Authorities  
Hertfordshire County Council  
Highways England  
Historic England  
LB Tower Hamlets  
Lee Valley Regional Park Authority  
Leicestershire CC  
London Borough of Redbridge  
London Legacy Development Corporation (LLDC)  
Marine Management Organisation (MMO)  
Metropolitan Police Service (MPS)  
Museum of London  
National Grid  
Natural England  
North London Waste Authority  
Northamptonshire County Council

Office of Rail and Road  
Oxfordshire County Council  
South East Waste Planning Advisory Group (SEWPAG)  
South Gloucestershire Council  
South London Boroughs  
Thames Water  
Thurrock Borough Council  
Transport for London  
Western Riverside Authorities (Wandsworth, Lambeth, Hammersmith & Fulham, Kensington & Chelsea, Old Oak and Park Royal Development Corporation)

**Political (5)**

Barnet Green Party  
Andrew Dismore, London Assembly member for Barnet and Camden  
Cllr Ian Rathbone, LB Hackney  
Haringey Liberal Democrats  
Rt Hon Theresa Villiers MP

**5. Consultation Events**

5.1 Six public consultation days were held during 2<sup>nd</sup> September to 11<sup>th</sup> September. Events took place in each North London Borough, with the exception of Camden and Islington for which a combined event was held in Camden. An additional meeting was held in Hackney about the Theydon Road area and notes of this meeting can be found at Appendix F. Information about these events was included in the letter/email sent to individuals and organisations on each Borough's Local Plan database (11,766 in total) informing them of the consultation on the draft NLWP prepared under Regulation 18. The information was also included in letters sent to over 7,300 properties surrounding the sites/areas.

5.2 Each consultation day included an afternoon workshop session which people were asked to register for in advance and an informal drop-in session in the evening. The planned Enfield workshop session did not go ahead due to lack of interest. The aim of each workshop session was to provide information about the Draft Plan as well as providing participants with an opportunity to discuss the Draft Plan and provide feedback. The aim of the drop-in sessions was to provide information and enable those attending to ask questions about the Draft Plan.

5.3 The attendees included local residents, residents' groups, environmental organisations, political representatives, local authorities and the waste industry. A full list of attendees is available at Appendix E.

5.4 A report on the public consultation events has been prepared based on the records of the sessions recorded during the events. This is available at Appendix E.

## 6. Representations: Summary of the main comments and resulting actions

6.1 We received many very helpful and thorough responses as a result of the consultation. This section summarises the main issues. Appendices A and B includes the full representations.

6.2 A summary of the main comments and resulting actions are provided here under each of the questions asked during the consultation.

**Q1: Do you agree with the proposed Aim for the draft NLWP? If not, please suggest an alternative.**

6.3 There was general support for the draft Aim of the Plan. Some textual changes were suggested including a stronger commitment to achieving net self-sufficiency.

### **Q1 ACTION**

Consider suggested changes.

**Q2: Do you agree with the proposed Draft Objectives for the draft NLWP? If not, please suggest an alternative and/or additional objectives.**

6.4 There was general support for the draft Objectives. In addition to textual changes, suggestions included an additional objective to protect the amenity of local residents, better links with other parts of the Plan, giving weighting to the objectives and a stronger commitment to achieving net self-sufficiency.

### **Q2 ACTION**

Consider suggested changes.

**Q3: Do you agree with the draft spatial strategy for the NLWP? If not, please provide further detail and any alternative approaches.**

6.5 There was general support for the draft spatial strategy. In addition to textual changes, suggestions included improving consistency and links with other parts of the Plan and double-checking that most up to date information on licenced facilities is used. It was noted that it is not possible to assess sites against non-spatial criteria of the spatial strategy.

6.6 Conflicting comments were received in relation to the use of waterways to carry waste. The Canal & River Trust, the Commercial Boat Operators Association, organisations such as Sustainable Hackney and one local resident support the use of waterways for the movement of waste materials. This is because it can contribute to reducing road congestion and pollution and is supported by national and regional policy. However, many residents and residents' associations do not support use of the canal or river for transporting waste, fearing pollution and a negative impact on biodiversity. Some comments also raised the issue of the practicalities of accessing waste facilities from the waterways and how this would affect the waterway's leisure/amenity use for local

residents. The NLWA add that the NLWP should make clear that transporting waste by water over short distances may not be the most commercially viable option.

### **Q3 ACTIONS**

Consider suggested changes.

Improve consistency and links with other parts of the Plan.

Liaise with the Environment Agency on licenced facilities.

Consider non-spatial criteria of spatial strategy.

Consider how to balance support for sustainable transport of waste via waterways and the objections of local residents to this.

**Q4: 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.**

6.7 This is one of the most technical parts of the NLWP and many local residents expressed confusion at the information presented. Clearly further work is required to explain how the capacity gap has been calculated. On the whole, the approach was supported by those in the field of waste planning. One representor suggested that further options are considered. It was also suggested that further modelling work is required on the re-classification of transfer stations, the impact of the circular economy and in light of new information from NLWA. It was also suggested that the Plan should contain more information about exempt sites.

### **Q4 ACTIONS**

Consider ways to improve accessibility of this section to non-technical readers.

Add additional explanation of how the capacity gap has been calculated.

Consider testing further options.

Further work to reclassification of transfer stations to recycling.

Further work on modelling in light of information from NLWA.

Further work on how the circular economy will impact on future waste management needs.

Include information on exempt sites.

**Q5: 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.**

6.8 Most of the detailed comments on this section were from waste planning authorities (WPAs) who currently receive waste exports from North London. More information on the management and export for each type of waste was requested, particularly CD&E and hazardous waste. It was also suggested that this section include more information about how the NLWP is reducing exports.

### **Q5 ACTIONS**

Add further information on management, exports, CD&E, hazardous waste.

Consider suggested changes.

**Q6: 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.**

6.9 The methodology for identifying new sites and areas was broadly supported, although the resulting sites/areas were often not. Residents felt very strongly that waste facilities should be located well away from residential areas. It was clear from the comments that residents were not familiar with the types of waste facility which could be built in North London or their potential impacts. More information on types of waste facility needs to be included in the Plan. Some representors felt that too much land had been identified and that sites in 'Band B' should be prioritised. Other representors felt that all industrial areas should be considered suitable. One representor felt that consolidation of a number of smaller sites should also be considered.

#### **Q6 ACTIONS**

Include information on types of waste facility and potential impacts.  
Consider prioritising waste sites/areas.  
Consider consolidation of waste sites.

#### **Policies**

6.10 Comments included suggestion for new policies including incorporating recycling facilities in new development, waste water and landfill/landraising.

#### **ACTION**

Consider suggestions for new policies.

**Q7: Do you know of any existing waste facilities which are not included in Schedule 1 in Appendix 1? If so, please provide details.**

6.11 There was strong support for Policy 1: safeguarding of existing sites. It was suggested that this policy could include expansions to existing facilities.

#### **Q7 ACTION**

Consider an addition to Policy 1 to include expansions to existing facilities.

**Q8: Do you agree with the draft policies for development on new sites and areas? If not, please provide reasons why and suggest an alternative.**

**Q9: 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?**

6.12 Around 70% (148) of the comments received were objections to sites and areas. A number of proposed sites and areas which have been assessed as potentially suitable for waste uses through the NLWP assessment criteria were not considered suitable by local residents and community groups. The main issues raised by residents related to the potential negative impacts of a waste facility in the local area, including traffic/congestion, suitability of roads and access, effect on biodiversity, flood risk, proximity to sensitive receptors and residential areas, concern over noise, smell, pollution, vermin etc. A number of objections by landowners and tenants were also received.

6.13 Residents in more densely populated areas of North London wish to see locations for new waste facilities in less densely populated areas and away from residential areas. Comments also expressed support for the aim to co-locate facilities and enlarge existing facilities which helps to minimise conflict with uses such as residential. However, other representors want to see a wide geographical distribution of facilities in order to manage waste near to its source. The waste industry would like to see all industrial land included as potentially suitable for waste development.

6.14 Some residents also suggested waste sites should be on the outskirts of North London or outside of North London entirely. However, the surrounding WPAs want to see more facilities within North London to deal with the area's own waste.

6.15 The North London Waste Authority (NLWA) submitted the land at Pinkham Way in response to the call for sites. The land was assessed against the sites/areas assessment criteria and was found to be suitable for some waste facilities. However, number of residents, politicians and community groups consider Pinkham Way site to be unsuitable for waste use on a range of grounds including viability and are challenging the ability of the site to be brought forward for waste use by the NLWA.

#### **Q8 & Q9 ACTIONS**

Re-assess proposed sites/areas in light of comments received.  
Update sites/areas proformas.

**Q10: Do you agree with the inclusion and provision of the policy on unallocated sites? If not, please provide an alternative approach.**

6.16 There was general support for this policy, although some respondents expressed concern that sites could come forward near residential areas. Suggested changes included clearer referencing and definitions of criteria used to assess unallocated sites and renaming the policy 'unidentified' or 'windfall' sites.

#### **Q10 ACTION**

Consider suggested changes.

**Q11: Do you agree with the locations identified as being in need for new Re-use & Recycling Centres?**

6.17 There was general support for improving RRC coverage across North London. However, many respondents were not clear where the "areas of identified need" for new RRCs were. The supporting text needs to include more detail on this. It was noted that a new RRC at Edmonton EcoPark is proposed.

#### **Q11 ACTIONS**

Add information on "areas of identified need" for new RRCs.  
Update information on RRCs.

**Q12: Do you agree with assessment criteria for waste management facilities and related development? If not, please suggest alternatives.**

6.18 There was broad support for this policy although a number of changes were suggested to strengthen requirements or for clarification. Competing views were received from residents who want strict controls on development alongside ambitious objectives, and the waste industry who consider some of the requirements in the policy too onerous.

**Q12 ACTIONS**

Consider suggested changes.

Consider how to balance the needs of both residents and the waste industry.

**Q13: Do you agree with the proposed approach to Energy Recovery and Decentralised Energy? If not, please suggest an alternative.**

6.19 There was broad support for this policy, although the waste industry considers some of the requirements too onerous as currently written and suggested a number of changes.

**Q13 ACTION**

Consider suggested changes

**Q14: 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.**

6.20 A number of suggestions about monitoring the NLWP were received. This included clarity on who is responsible for monitoring. Additional monitoring indicators were also suggested.

**Q14 ACTION**

Consider suggested changes and additional monitoring indicators.

## 7. Duty to Co-operate

7.1 A cross-boundary meeting took place on 10<sup>th</sup> September 2015 to discuss the Draft NLWP. Notes of this meeting can be found in Appendix G. Attendees included waste planning authorities in the East and South East of England who receive waste from North London, the Greater London Authority and the Environment Agency. This meeting formed part of the North London Boroughs' ongoing duty to co-operate engagement, reports of which are made available on the [NLWP website](#).

7.2 The meeting took the form of presentations and discussions about the Draft NLWP. The presentations included Introduction to the Draft Plan, Exports and Duty to Co-operate. Attendees were able to ask questions about the proposed strategy of the Draft Plan and how this will affect their areas. WPAs who receive waste from North London were encouraged to submit comments on the Draft Plan.

## **8. Next Steps**

- 8.1 The North London Boroughs will consider the comments made during the Draft Plan consultation and undertake the actions set out in section 6 of this report. Representations received will influence the next version of the NLWP ('Proposed Submission').
- 8.2 It is anticipated that the Proposed Submission version will be available for consultation in summer 2016. Everyone who made comments on the Draft plan will be notified of this consultation.
- 8.3 The Proposed Submission NLWP will be accompanied by a Consultation Statement which will explain how the comments received on the Draft Plan have been taken into account.