

## **Independent Examination of the North London Waste Plan to 2035**

### **Statement from the North London Waste Authority (NLWA)**

**Ref: Matter 5 – Policies, Policy 2 Question 62**

**Dated 28 October 2019**

NLWA has agreed a Statement of Common Ground (SOCG) with the North London Boroughs regarding our representations on the NLWP.

An area of outstanding disagreement is the discrepancy between the waste facility types listed in table 11 as appropriate for the Friern Barnet Sewage Works/ Pinkham Way site (A22-HR) and the suitability list outlined in Appendix 2.

As outlined in our proposed submission representation NLWA4 we said that the NLWP should not favour one treatment type over another because it is likely that during the period covered by the NLWP new technologies will emerge, as will the ability to mitigate any impacts, meaning that some treatment types may become more acceptable at particular sites in the future. We therefore argued that the NLWP should seek to retain maximum flexibility by not indicating what type of treatment might be suitable, thereby prejudicing future planning applications. We requested that the 'Waste Facility Type' column be deleted from Table 11.

We appreciate the need for consistency with national planning policy requirements and government guidance, and we understand that section 4 of the NPPW, says that Waste Planning Authorities should identify the type or types of waste management facility that would be appropriately located on an allocated site or in the allocated area, noting that care should be taken to avoid stifling innovation in line with the waste hierarchy.

We therefore consider that if there is a list of waste facility types for which each area is deemed suitable, then the widest possible range of facility types should be listed for each area. Since the NLWP submission version there have been a number of government consultations in the past year about the framework for wastes management in the UK, including proposals for introducing a Deposit Return Scheme and Extended Producer Responsibility (EPR) which could have a significant impact on the way in which waste is managed in the future. As a result, the requirements for waste reuse, recycling and recovery infrastructure could be very different from what is needed now, further adding to the argument to retain flexibility to keep as wide a range of facility types as possible for each area.

In relation to the Friern Barnet Sewage Works/ Pinkham Way site (A22-HR) we regard the site as suitable for the range of uses outlined in Appendix 2, not the narrower list included in Table 11.

NLWA has no intention to use the site for thermal treatment or mechanical biological treatment during the lifetime of the NLWP. However, A22-HR might be suitable for types of treatments included within Category D, for example anaerobic digestion which is likely to have similar potential effects and material planning considerations to indoor composting in that it would be enclosed and potentially result in similar effects. We therefore support the inclusion of these types of waste facility within the suitability list outlined in Appendix 2, not the more narrow list in Table 11.

The NLWP states (Appendix 2) in relation to the Friern Barnet Sewage Works/ Pinkham Way (A22-HR) that it is suitable for the following types of waste use: 'Integrated resource recovery facilities/resource parks, anaerobic digestion, pyrolysis/gasification, mechanical biological treatment. Waste transfer, processing and recycling, indoor composting, in-vessel composting and outdoor composting. Thermal Treatment facilities may be viable but should only be considered if a combined heat and power facility could be incorporated into the facility and linked up to a district heating system. Areas not lying within Flood Zone 3 are potentially suitable to handle hazardous waste.'

We make a similar point about the assessment of Millfields LSIS (A15-HC). This area is listed as suitable for waste management facility type C 'Integrated resource recovery facilities / resource parks' only. However, the description of this area in Appendix 2 refers to it as 'Industrial site occupied by Hackney Council Waste Transfer Station and Fleet Depot and a former Power Station'.

If transfer is already being undertaken in this area it should also be listed as suitable for waste operation type E (waste transfer) too. It may also be suitable for recycling, facility type A.