



Darren Johnson AM

City Hall
The Queen's Walk
London SE1 2AA
Switchboard: 020 7983 4000
Minicom: 020 7983 4458
Web: www.london.gov.uk

Our ref: DJ3665

Your ref:

Date: 7 July 2011

Archie Onslow
North London Waste Plan
Camden Town Hall
Argyle Street
London WC1H 8EQ.

Copy of letter also emailed
to: feedback@nlwp.net

Dear Mr Onslow

Response to the North London Waste Plan consultation

The North London Waste Plan which sets out the planning framework for waste management for seven London boroughs over the next 15 years presents a real opportunity to incorporate best practice in local authority waste management practices and for the waste industry to move waste management up the waste hierarchy to reduce, reuse, recycle and develop extensive anaerobic digestion capacity for dealing with food waste. I welcome your commitment to self-sufficiency in waste management and the creation of sufficient waste capacity to meet the estimated 'capacity gap' that will arise from the loss of landfill and the closure of the Edmonton incinerator and other reasons described in the draft plan.

However, I believe the plan is failing to ensure consistency with National and European policies of driving up the waste hierarchy and for a sustainable approach to managing waste. This is because it does not adequately address the following:

- a) waste reduction
- b) the promotion of high value/quality waste recyclables as the preferential approach to waste management, supported by maximum separation at source, from kerbside/flats and businesses across the administrative boundaries of the North London Waste Authority.

Disappointingly the plan does not appear to discourage the production of black bagged, residual waste. In fact it appears to encourage it by proposing a 600,000 tonne Mechanical Biological Treatment (MBT) capacity for unsorted waste, almost two thirds of NLWA's municipal total waste.

The identification of Pinkham Way (site 121) for a major waste facility, such as a 300,000 tonne new MBT waste plant, is both unsound and unjustified. It will lead to further traffic congestion and deterioration of existing poor air quality, on and around some of the most congested roads in London and will adversely effect local residents and schools. I believe the proposal will not meet the criteria in the London Plan of being 'air quality neutral' in this Designated Air Quality Management Area. Major new facilities should only be built on either existing waste sites such as the location of the Edmonton incinerator or on strategic industrial locations as identified in the London Plan.

Waste Reduction policy

The plan highlights that municipal waste is falling, despite the growing population in North London, with the amount of waste per person, per annum decreasing from 0.6 tonnes in 06/07 to 0.56 tonnes in 09/10. This gap between the facts and the official estimates is likely to grow sharply in coming years and the plan should reflect the revised waste predictions accordingly. If the 600,000 tonne MBT capacity goes ahead, it will demand this fixed tonnage over the long term and will undermine and hamper waste minimisation efforts. The plan needs to re-calculate its MBT requirement and limit capacity to actual residual waste, which according to research should be less than a third of municipal waste.

The plan needs to support robust waste minimisation policies and waste reduction should be included in the aims of the plan:

For instance, about a fifth of household waste is food waste, and mostly avoidable. This presents an opportunity to reduce waste at source and the plan should support and actively promote communication tools such as the 'Love Food Hate Waste Campaign', emphasising the potential household savings, estimated as £480 for the average household and increasing to £680 a year for households with children. The plan should also support the provision of food caddies or separate food collection containers to all households and businesses. Not only could this significantly reduce waste production at source but could lead to huge saving in waste collection and processing costs, not to mention savings to the environment and transport movements and reduce the 'capacity gap' described in your plan.

In addition to dealing with food waste, Policy NLWP3 should go much further than the current policy of locating recycling centres where 'identified need' is demonstrated, and to provide easy and convenient recycling and re-use centres to all residents.

Sources:

- 1) Household Food and Drink Waste in the UK http://www.wrap.org.uk/retail_supply_chain/research_tools/research/report_household.html
- 2) Understanding Food Waste, WRAP March 2007: http://www.wrap.org.uk/local_authorities/biowaste.html
- 3) North London Waste Authority Plan

Choosing the right recycling collection system to produce high quality waste streams

The plan should give preference to the production of high value/quality recyclables and for maximum source separation of kerbside/flats and business waste that allows contamination to be filtered out at the point of collection, giving the most reliable stream of quality materials.

The resulting high quality recyclables can then be used in closed loop recycling systems and in equivalent processes, removing the need for virgin materials (and much of the energy and cost required to extract and process raw materials). UK re-processors in key areas such as paper and certain types of glass are unable to find sufficient materials of the required quality from the UK market. This approach would help to provide high quality recyclables that would ensure that environmental and economic benefits are maximised. Only when practical and operational barriers exist should other collections systems be used. The production of high value/quality recyclables should be reflected in the aims of the plan.

Source:

'Choose the right recycling collection system' WRAP report
http://www.wrap.org.uk/downloads/Choosing_the_right_recycling_collection_system.5151f7a2.7179.pdf

Recycling targets

The plan should support waste facilities that will produce high quality recyclables beyond the target set out in the draft replacement London Plan of 60% by 2031, to at least the target of 70% set by both the Scottish Government and Welsh Assembly by 2025. Friends of the Earth believe that a recycling rate of over 80% of municipal waste is possible. This level of recycling was recently supported by Peter Kurth, the president of the European Federation representing the European waste management industry who argued that only recycling rates above 80% will allow a significant slowdown of the depletion of natural resources.

Sources:

(1) Friends of the Earth briefing on residual waste: www.foe.co.uk/resource/briefings/residual_waste.pdf#page=12

Source:

(2) Peter Kurth, President of the European Federation representing the European Waste Management Industry speech in May 2011
http://www.fead.be/uploads/FEAD%20presentation/FEAD_Green_Week_FINAL_18May2011.pdf

Recycling and Flats

As the NLWA administrative area contains areas with a high proportion of flats the plan should support the provision of good quality, convenient, cost effective recycling collection services for flats and multi-occupancy building with source separation so contamination can be filtered out at the point of collection, minimising the amount of residual waste. The current average recycling rate for flats is just 10% and this must be a priority area for boosting recycling rates.

Source: The Mayor's Draft Municipal Waste Management Strategy – London's Wasted Resource – January 2010

Provision of waste facilities

The plan assumes an indicative need for facilities for 600,000 tonnes of Mechanical Biological Treatment (MBT) capacity for the production of solid recovered fuel for use in Combined Heat and Power Plants; 150,000 tonnes for Anaerobic Digestion for food waste and; 150,000 tonnes Materials Reclamation Facility (MRF) for recyclables, as well as other facilities for bulking waste, green waste and Household Waste Recycling Centres (no tonnage given).

This would mean that almost two thirds of total municipal waste could end up being sent to MBT plants. Whilst it may help boosting recycling targets, the resulting dry recyclables separated out during the process will be of poorer quality compared to that of waste separated at source at kerbside/flats and business or from bring-bank schemes. Poor quality materials are less likely to be processed in the UK, and will fetch a lower value in the market and be unsuitable for closed loop or manufacturing processes requiring quality streams of recycled waste.

Only the genuinely residual waste fraction, which should not make up more than a third of municipal waste, should be sent to MBT plants that deal with unsorted waste for solid recovered fuel and used for energy recovery. This approach would require the MBT planned capacity to be half of the size proposed in the plan and make the need for Pinkham Way 300,000 tonne proposal unnecessary. Creating huge capacity of 600,000 tonnes for MBT as proposed in the plan is likely to demand this fixed tonnage and undermine future waste minimisation efforts, as well as entailing long term inflexible contracts.

Research shows that a fifth of household waste is food waste and that half of this is unavoidable food waste, ie non edible peelings etc. This should be separated at source, at kerbside/flats and from businesses with the waste stream then processed in in-vessel composters or anaerobic digestors, producing compost, liquid fertilizer, soil improver or be used to generate heat and power from biogas.

To meet the 'capacity gap' that is required for waste management, the re-orientation or intensification of existing waste management sites and transfer stations is the right way. Major new waste facilities (where their need is demonstrated) should only be built on either existing waste sites such as the location of the Edmonton incinerator and on Strategic Industrial Locations as indicated in the draft replacement London Plan (para 5.6). Pinkham Way does not fall into one of these categories and should be removed from the plan as a new site for general waste use. The re-designation of the Pinkham Way site as a Locally Significant Industrial Site in emerging core strategy for Haringey has not yet been approved and is unjustifiable given its proximity to residential accommodation and its nature conservation designation.

Sources:

- 1) Food waste collection guide report – WRAP http://www.wrap.org.uk/downloads/food_waste_collection_guidance_-_amended_Mar_2010.8703e59a.7749.pdf
- 2) Taking Recycling to a New Level – white paper into the potential contribution of low and high rise flats to UK and European recycling targets – January 2010
- 3) Friends of the Earth briefing – Mechanical and Biological Treatment (MBT)

Transportation & Air quality

The North London Waste Plan 'preferred options technical report' for Pinkham Way (site 121) fails to score and rank air quality in its list of criteria for site selection, despite 'air emissions' being one of the location criteria listed in paragraph 2.19 of the report, bringing into serious question the decision for Pinkham way to be selected as a preferred site.

In addition, I believe that the score attributed to Pinkham Way in the Technical report appears to be unjustifiably inflated, allowing the site to be selected as a preferred site.

With potentially over a thousand vehicle movements (including many HGVs) a day, a major waste plant at Pinkham Way would make air pollution in the area even worse and affect the health of local residents and local schoolchildren. The roads are already some of the most congested in London. Even without any further traffic increases, a local air quality monitoring station (Bowes Primary School) has already recorded 20 bad air days this year and could exceed the legal annual limit of 35 bad air days.

I believe that the air quality impacts of a major new waste plant at Pinkham Way do not comply with the draft replacement London Plan 'Policy 7.14c – Improving air quality' which states that development proposals should 'aim to be 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas' which is the current designation of Haringey and the Pinkham Way site.

This is a further reason that the inclusion of the Pinkham Way site in the plan is unsound and unjustified.

Source: NLWP preferred options technical report, site report for 121. October 2009

Preserving habitat and Conservation Areas

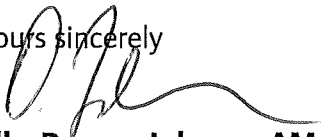
As stated earlier, major new waste facilities (where their need is demonstrated) should only be built on either existing waste sites such as the location of the Edmonton incinerator and on strategic industrial locations as indicated in the London Plan and not on sites such as Pinkham Way which include a Borough Grade 1 Site of Importance for Nature Conservation and is designated for its botanical diversity and uncommon plants. The identification of this site will adversely effect local biodiversity and is contrary to the Policy NLWP 4 – protecting amenity (i) which states that 'the development has no significant adverse effects on local biodiversity' or 'adverse effects affecting the integrity of an area designed under the Habitats Directive'.

Summary

In summary, the waste plan is unsound in failing to support maximum separation of waste at source rather than through the MBT process which will require a substantial black bag waste stream into the future. Maximum separation at source, including food waste for anaerobic digestion, would also be compatible with the provision of smaller waste management sites which would be much more appropriate in a dense urban area and could be acceptably located closer to residential areas.

The identification of the Pinkham Way site (121) in Table 6.3 of the plan is unsound and unjustified. It amounts to locating a very major industrial facility very close to homes and schools in an area already suffering from dangerous levels of air pollution, and ignores the valuable role that the site with its high nature conservation value can play in alleviating the impacts of traffic and air pollution in the locality. The site and Table 6.3 should be removed from the plan.

Yours sincerely



Cllr. Darren Johnson AM

Green Party Member of the London Assembly

Direct telephone: 020 7983 4411 **Fax:** 020 7983 4398 **Email:** darren.johnson@london.gov.uk

London Assembly website: www.london.gov.uk/assembly/members/johnsond.jsp