

**Camden Friends of the Earth**  
**Response to The North London Waste Plan Proposed submission version May 2011**

Camden Friends of the Earth recognises that London needs to deal with its own waste in London more and we oppose general dumping to landfill and mass burn incineration. We support the parts of the NLWP that align with this view.

However, we believe the proposed North London Waste Plan (NLWP) is unsound on a number of points, listed below.

We have two key issues of concern:

- **Waste and recycling projections are unsound**
- **New sites should not be safeguarded as existing sites**

Furthermore we would like to raise the following points:

- Recycling and composting targets should be higher
- Waste should not be considered a renewable energy source
- Waste hierarchy should be clearly prioritised
- Air pollution should not be increased and green space found for any lost

These issues are explained in further detail with reference to relevant sections of the NLWP.

### **1. Waste and recycling projections are unsound**

We do not believe this the NLWP should use the waste and recycling projections/targets from the 2009 draft London Plan. These are out-of-date figures based on historical data during a period of economic growth and increasing construction.

The London Plan itself notes that the model used for calculating waste arisings "does not account for the effect of any future policy or other interventions that may effect arisings, for example proposed changes to the legal definition of municipal waste and behaviour change campaigns" (See:

Future Waste Arisings in London 2010-2031 Summary Note

Summary Note: <http://www.london.gov.uk/shaping-london/london-plan/docs/waste-arisings-note.pdf> ) This means that the NLWP is based on flawed figures that do not reflect current trends.

#### **Paragraph 5.7** of the NLWP –

“Municipal waste arisings in north London fell by 1.5% in 2007-08, and by 4.1% in 2008-09, while the draft London Plan predicts the quantity of municipal waste to increase by an average of 0.98% every year for the period 2011-2026.”

“..the North London Waste Plan uses the apportionment data as the basis for determining its need; this may lead to a slight overestimate of the land requirement but will allow for more flexibility in the delivery of the Plan.”

This paragraph proves that plan itself notes that the waste trend is downward and that the apportionment data is likely to be unsound. Using these figures and projections as a basis is flawed and makes the NLWP ineffective as it locks in a need for additional capacity/new capital projects to manage waste which may well be unnecessary.

**The plan must take into account recent falls in waste levels, growing levels of household environmental awareness and recycling and future behaviour change campaigns, and use these as a basis for waste projections.**

## **2. New sites should not be safeguarded as existing sites**

We do not believe that new waste management sites should be treated in the same way as existing sites. We believe the inclusion of specific named new sites (e.g. Pinkham Way) in the plan is unsound when these sites have not been approved in the planning process and the status of these sites may yet change. Furthermore, to apply the same safeguarding measures for existing sites onto new sites is unjustified when new sites have no existing facilities or infrastructure.

### **Paragraph 6.11** New sites

These sites should not be included in the plan as “new sites” until they have been legally approved – until this point they are merely potential sites and it is pre-emptive to include these in this plan.

In the particular case of Pinkham Way we believe this site contravenes a number of salient planning policies (such as the site’s proximity to residential districts and its impact on traffic congestion and air quality). This therefore makes the basis for this being a ‘new site’ unsound and must therefore be rejected and removed from the NLWP.

### **Paragraph 7.1, Paragraph 7.2** and **Policy NLWP 1** – safeguarding and protection of existing sites

Policy NLWP 1 is for existing sites so should not include, mention or safeguard new sites. A separate policy is required if there are approved new sites that need to be included. Furthermore, potential new sites cannot be “safeguarded” if they are not approved or if there are more appropriate alternatives.

In addition when considering new sites:

### **Paragraph 5.22**

“Since the NLWP is not specific about waste management technologies on specific sites, the onus is on the developer to convince the relevant planning authority (borough) of the merits of their proposal, its fit with the policy framework and the development would not have any unacceptable impacts”

The wording must reflect that the onus should be on the developer to ensure their proposal is appropriate, environmentally sound and fits with the policy framework -- not to “convince” authorities.

**We suggest that new named sites are removed from the plan entirely until formally approved in the planning process. At present they are “potential sites” and should be dealt with a separate policy from that which deals with existing sites.**

## **3. Recycling composting targets should be higher**

### **Table 5.1** “Waste management targets for London”

Recycling composting level of 45% by 2015; 50% by 2020; 60% by 2031

We do not believe these figures are ambitious enough or go far enough based on current trends in increased recycling (evidenced in Camden with increases in dry recycling rates following the roll out of food waste collections), and alongside anticipated future policy and legislation. Although the target of 50% of waste from households is recycled by 2020 is in line with the Waste Framework Directive target, the Government Review of Waste Policy in England 2011 states:

“We must *at least* meet these targets if a zero waste economy is to become a reality in the medium-term.” (their emphasis)

<http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf>

The ambition of these targets is therefore not ambitious enough given the trends and opportunities seen in north London. Local authorities can do much more to step up waste reduction and re-use policies as well as improving recycling in multi-occupancy households.

Examples in cities worldwide show that urban areas have already achieved very high recycling rates:

- San Francisco recycles 75% of waste
- Salerno (near Naples, population 145,000) increased recycling from 18% to 72% in one year
- Novara (near Turin, population 100,000) achieved 70% diversion in just 18 months

There is a huge potential to increase recycling in the North London Waste Authority area: in Barnet alone, according to local authority figures, 72% of household waste could be recycled: current recycling rates are 30%. Camden's recent switch to weekly waste collection (in areas where it had been twice-weekly) supports a focus on recycling which the NLWP should prioritise on both environmental and economic grounds.

**Friends of the Earth is calling for a reduction in black bag waste from current levels of 50% by 2020: we suggest the targets in the NLWP should reflect this goal.**

#### **4. Waste hierarchy should be clearly prioritised**

We do not feel that the NLWP promotes or prioritises the waste hierarchy consistently which means that particular areas of the plan are unsound and focus on incorrect assumptions about increasing waste, locking in projects that depend on high waste streams rather than a focus on waste avoidance, re-use or recycling. In particular:

##### **Paragraph 5.13** [commercial and industrial waste projections]

“Provision of land for new infrastructure will allow for the development of additional commercial and industrial waste recycling facilities that will contribute towards achieving the 70% recycling target”

The plan should not focus on new infrastructure as a way to achieve higher recycling targets. A sound approach would focus on achieving a higher recycling apportionment through waste avoidance, re-use and waste minimisation, according to the waste hierarchy (Figure 2.2), which would not justify the need for expensive capital projects - the wording should reflect this.

##### **Paragraph 7.3**

“There is a presumption that such sites are safeguarded but if they are to be developed for alternative use, developers need to demonstrate that provision, equal in both scale and quality, is provided within the north London boroughs. Consideration will be given to the type of waste managed and whether the proposed facility treats waste at a higher level in the waste hierarchy. Developers should ensure there will be no net loss in north London waste capacity”

This reflects the assumption towards ever increasing amounts of waste - lower waste capacity is ok if waste levels reduce. The NLWP must target the right level of the waste hierarchy (waste minimisation) and not lock in unnecessary capital projects.

##### Similarly in **Paragraph 7.1**

“development for non-waste must be considered on the land... unless compensatory and equal provision of sites for waste in scale and quality is made elsewhere within the north London boroughs”

Provision of sites may not be necessary if the right level of the waste hierarchy is targeted.

**We suggest that the NLWP should explicitly prioritise higher levels of the waste hierarchy much more and ensure this standpoint is consistent throughout the plan.**

#### **5. Waste should not be considered a renewable energy source**

The NLWP focuses on waste as an energy source. According to the waste hierarchy we should focus on waste avoidance and re-use and should not lock ourselves into an energy model which requires us to produce waste when there are proven cleaner renewable technologies that have much lower environmental impacts than energy from waste.

**Paragraph 2.26** “the remaining waste offers an important potential renewable energy source for decentralised or industrial use” - suggest the words ‘important’ and ‘renewable’ should be removed.

Studies in Germany indicate that energy from waste/incineration impedes recycling, deposit and reuse schemes. Energy from waste creates a demand for waste to recuperate the costs incurred in constructing facilities needed to produce the fuel; this therefore impedes innovation in schemes higher up the waste hierarchy, such as improving recycling, making more durable products, or deposit schemes. (See NABU-Studie Abfallkapazitäten in Deutschland / Nabu Study Waste capacity in Germany 3 March 2009).

**We consider that Policy NLWP5 “waste facilities will be required to contribute to decentralised energy networks” should not be a requirement as this means the waste plan does not prioritise the waste hierarchy. Such facilities should only be considered after it has been demonstrated that sufficient measures are in place to reduce and recycle waste as far as possible - including working with the supply chain.**

We suggest that focus should not be on energy generation but instead of minimising residual waste, maximising recycling, maximising recycling from the material at the plant and landfilling the real remainder. The recent national waste strategy confirms that MBT to landfill is the best option after prevention/re-use/recycling as noted in DEFRA’s Economics of Waste paper (See <http://www.defra.gov.uk/publications/files/pb13548-economic-principles-wr110613.pdf>) which states

“MBT (mechanical biological treatment)-landfill provides the best emissions performance in terms of the treatment/disposal of residual waste. It essentially involves landfilling somewhat stabilized wastes with some material recovery.”

However we strongly urge the NLWP to ensure that the best alternative options, environmentally and socially, are considered and that MBT is not made a requirement.

## **6. Air pollution should not be increased and green space reinstated for any lost**

Air pollution is not given enough detail or focus in the policies proposed. We feel there is a need to ensure that air pollution cannot be made worse particularly in areas of North London where air pollution already breaches EU limits. Waste sites must not be situated so that a number of smaller plant in different locations can combined to bring air pollution over EU limits, and air pollution in areas already exceeding EU limits should not be added to.

### **Paragraph 7.13 Policy NLWP 4 Protecting amenity**

We would like to see “adequate means of controlling air pollution” included.

Similarly in **Paragraph 7.15** we suggest the text includes specific reference to air pollution: “Noise, dust, litter, odours, **air pollution** and other emissions and their potential health impacts.

### **Paragraph 7.19 Waste and recyclables transportation**

We suggest that if road transport is required developers should be required to demonstrate steps they are taking to ensure minimisation of air pollution and that vehicles used should be as low emission as possible.

**We suggest that minimisation of air pollution and air pollution limits should be mentioned in all relevant policies including for new/potential sites. Air quality impacts from activities such as incineration or transport to/from sites need to be explicitly mentioned and considered.**

**Finally, we would also suggest that policy makes provision for alternative equivalent green/open space to be found for any lost due to development of land.**