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Our Ref: 12194



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Dear Sir or Madam

**NORTH LONDON WASTE PLAN PROPOSED SUBMISSION
TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012**

1. DWD submitted a letter dated 09/04/2019 in response to the Regulation 19 consultation version of the proposed North London Waste Plan (“NLWP”). In brief, that letter explains that GBN Services have secured planning permission and now operate from their new flagship waste management facility in LB Enfield. That facility has an EA licenced capacity of 200,000t (ref: EPR/FB3609LQ) covering a wide array of waste streams. The crux of that representation is that the extant WAF 4 site is no longer fit for purpose and the site is better suited to meet other aspirations of the adopted and emerging development plan, particularly in considering the nature of its locality.
2. Following the submission of that letter GBN has since signed a Statement of Common Ground which concludes that *“The Boroughs are now satisfied that the Enfield site provides compensatory provision for the Leyton site and that WAF 4 can be deleted and be replaced with the new site at Gibbs Road, Enfield into Appendix 1”*.
3. This addendum follows further scrutiny of the evidence base and proposed NLWP. The content does not respond to an identified MIQ but it is most appropriately considered in conjunction with MIQ 66 as it concerns the site immediately adjacent and within the same ownership.

Background to Addendum

4. Proposed NLWP Appendix 1 described above is a list of the proposed safeguarded sites for waste use within the various Boroughs. The list for Waltham Forest runs from WAF 1 through WAF 15. Evidence base document ‘Waste Data Study Part 3: Sites Schedule Report (2019): Appendix 4 - Site Profiles’ includes completed proformas of all the existing waste sites in LB Waltham Forest and runs from WAF 1 through WAF 17. Other aspects of the evidence base also include WAF 17 in their consideration so we have no doubt that the throughput capacity at WAF 17 has been fully accounted for.
5. WAF 17 is currently occupied by Pulse Environmental Ltd and their EA permit allows for up to 75,000t. Their operation consists of paper shredding, baling and exporting to other processes off site with their EA permit falling under ‘waste transfer (household and commercial)’ (ref: 400150).
6. GBN Services are the land owner and landlord of WAF 17. Pulse Environmental have entered into an agreement which will permit them to surrender their lease and vacate WAF 17 in the next 12 in pursuit of land outside of North London where there is a greater economic justification for their occupation.

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7. The evidence base which summarises the findings at WAF 4 and at WAF 17 identifies the throughput tonnage in from 2012 to 2016. The details for 2017 are now available and have been included on the table below:

Year	Tonnage	
	WAF 17	WAF 4
2012	n/a	27,711
2013	n/a	49,210
2014	n/a	72,166
2015	14,848*	18,190
2016	9,164	70,480
2017	10,084	73,940*

* maximum throughput over previous 5 years

Addendum to Previous Representation

10. The preparation of the NLWP is by no means an easy task with a plethora of moving parts and considerations. DWD's representation is submitted to assist in ensuring that the development plan document is 'positively prepared', 'justified' and 'effective'. Emerging London Plan (post EiP version) paragraph 9.9.2 states that the "release of current waste sites...should be part of a plan-led process, rather than done on an ad-hoc basis".
11. WAF 17 is due to become a vacant site and its current throughput capacity will reduce to zero. We therefore submit that WAF 17 should be excluded from Appendix 1 of the proposed NLWP and its throughput capacity compensated by the throughput capacity at GBN's Enfield site where the EA permit for 200,000t covers the same waste streams under the permit's heading 'household, commercial and industrial waste transfer station with treatment' (ref: EPR/FB3609LQ); specifically included in that permit are waste streams 03.03.07; 03.03.08; 09.01.07; 09.01.08; 15.01.01; 19.12.01 and 20.01.01, all of which cover every aspect of paper handling and recycling.
12. In numerical terms, WAF 17 accounts for a small proportion of the gross 'commercial and industrial' ("C&I") waste tonnage capacity. WAF 4 was also assessed under waste stream C&I and as explained in the final paragraph of DWD's original letter, the replacement and compensatory provision at GBN's Enfield site falls under CI and CDE (construction, demolition and excavation). There is therefore no net reduction in C&I waste capacity with GBN's Enfield site representing a margin for growth capacity of an additional 111,212t above existing 5 year maximum throughputs.

Should you have any queries regarding the content of this letter please contact me on the details below and I will be able to assist.

Yours faithfully



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