



Public Consultation on Main Modifications to the Proposed Submission North London Waste Plan (NLWP)

Representation Form and Guidance Notes

Please save and return to feedback@nlwp.net by the end of Thursday
10th December 2020.

This form has two parts:

Part A – Personal details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Guidance notes are available at the end of the Representation Form. Please read the advice in the guidance notes on making a representation attached to the consultation before completing this response form.

Please note that any comments you make will be made publically available and attributed to your name. Please see the [Privacy Policy](#) for details of how we use your information. We are required to share your information with the Planning Inspector for the purposes of the Examination.

Part A: Personal Details:

Name: Eleri Randall

Job Title: Planning Advisor
(where applicable)

Organisation: Environment Agency
(where applicable)

Part B – Your representations

Please use a separate sheet for each representation

1. To which Main Modification does this representation relate? (one modification reference per form)

Main Modification reference: MM109 Appendix 2: Hackney LLDC Area Profiles; MM110 Appendix 2: Hackney LLDC Area Profiles; MM111 Appendix 2: Haringey Area Profiles; MM114 Appendix 2: Waltham Forest Area Profiles; and MM115 Appendix 2: Waltham Forest LLDC Area Profiles

Paragraph number: Appendix 2 Area Profiles as above.

2. Do you consider the proposed Main Modification to be:

Legally compliant (Y/N): Y

Sound (Y/N): Y

3. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your comments relate to:

Positively prepared

Justified Effective

Consistent with national policy

4. Please give details of why you consider the proposed Main Modification is not legally compliant or is unsound. Please be as precise as possible.

- i. The modified wording doesn't necessarily make clear that potential increases in future flooding within the 1% AEP event is due to climate change. It should be made clear that it's important to assess the impact of climate change to better understand the future flood risk.
- ii. The modified wording now also includes a breakdown of which climate change allowances should be assessed. Although the right allowances have been included based on the latest climate change guidance, we think it would be useful if an extra line or 2 could be added to say that any site-specific Flood Risk Assessment must use the latest climate change guidance, which may include different allowances to those currently presented.

5. Please set out what change(s) you consider necessary to make the proposed Main Modifications legally compliant or sound, having regard to the test you have identified in Q3 above where this relates to soundness. You will need to say why this change will make the proposed Main Modification to the Proposed Submission NLWP legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. The wording should be altered to be made clear that it is important to assess the impact of climate change to better understand the future flood risk.
2. We suggest extra wording to highlight that any site-specific Flood Risk Assessment must use the latest climate change guidance, which may include different allowances to those currently presented.

6. Do you require notification of any of the following to your email address stated in Part A:

The publication of the inspector's recommendations following the independent examination (Y/N): Y

The adoption of the Local Plan (Y/N):Y

