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24th March 2014

Dear Ian Kemp

Northamptonshire Minerals and Waste Examination

Thank you for your email of 20th February 2014 providing information on the examination of Northamptonshire's Minerals and Waste Local Plan, and your email of 12th March 2014 inviting comments relating to the government's recently published NPPG.

I am responding on behalf of the North London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. These boroughs as waste planning authorities are co-operating on the North London Waste Plan (NLWP).

After reading the *Responses and Council Comments* document in which Northamptonshire responds to the comments we submitted on 31st October 2013, we wish to make the following additional points.

Duty to co-operate

- Waste is a strategic cross-boundary matter, and therefore subject to the duty to co-operate.
- The North London Boroughs do not feel there has been "constructive, active and ongoing engagement" throughout the plan making process, nor a "continuous process of engagement from initial thinking through to implementation".
- After initial correspondence on waste movements in late 2012, the only other contact has been consultation on draft versions of the plan. This does not constitute "co-operation".
- New data on waste movements has not been discussed.
- Northamptonshire have not responded to our duty to co-operate letter of 22nd January 2014 requesting engagement on waste movements between our areas.

Catchment areas


- Catchment areas run contrary to the notion of net self-sufficiency, which means providing facilities to deal with the total quantity of waste arising in an area, notwithstanding the fact that waste will continue to be imported and exported due to existing contracts.
- The North London Boroughs, like other WPAs, are seeking net self-sufficiency but will also be seeking to manage waste in the most appropriate facility. In the case of hazardous waste, this is likely to be a facility outside the sub-regional area.
- Waste exports from north London to Northamptonshire consist mainly of hazardous waste (10,768 tonnes in 2012) which is generally treated in specialist facilities with a wide catchment area.

National Planning Policy Guidance (NPPG)

We have been invited to make comments related to the NPPG which will be a material consideration for the Inspector in considering whether the Local Plan is sound. The NPPG includes a section on the duty to co-operate. In light of our comments above, I would like to draw the Council's attention to the section on demonstrating compliance with duty to co-operate.

Please accept this letter as the further written statement on behalf of the North London Boroughs.

Yours sincerely



Archie Onslow
Programme Manager