

Chloe Duddy

From: Mary McGuiggan [REDACTED]
Sent: 27 January 2020 13:25
To: Local Development Plan
Subject: Fwd: ldp ROC/RON
Attachments: ldp response.docx

Dear Sir/Madam,
See below the response of Zero Waste North West to our local development planning consultation.
Please let me know that you have received this email today.
Thanks
Mary

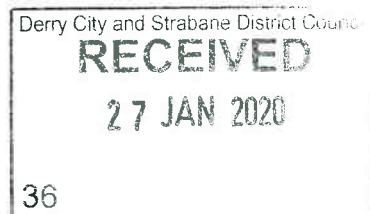
----- Forwarded message -----

From: James Orr [REDACTED]
Date: Mon, 27 Jan 2020, 12:55
Subject: ldp ROC/RON
To: marypmcguiggan <[REDACTED]>

Here you go Mary. Hope this helps.

Take care amigo

James



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Zero Waste North West Submissions to the DCSDC Local Development Plan

Section	Comments
Survey and profile pg 17, point 2.6	Include Muff Glen and Learmount woods. Also include 'this LDP will ensure the protection of such assets'
Policy context pg 36, point 3.7	<p>These should be linked into the United Nations Sustainable Development Goals:</p> <p><u>GOAL 1: No Poverty</u></p> <p>GOAL 2: Zero Hunger</p> <p>GOAL 3: Good Health and Well-being</p> <p>GOAL 4: Quality Education</p> <p>GOAL 5: Gender Equality</p> <p>GOAL 6: Clean Water and Sanitation</p> <p>GOAL 7: Affordable and Clean Energy</p> <p>GOAL 8: Decent Work and Economic Growth</p> <p>GOAL 9: Industry, Innovation and Infrastructure</p> <p>GOAL 10: Reduced Inequality</p> <p>GOAL 11: Sustainable Cities and Communities</p> <p>GOAL 12: Responsible Consumption and Production</p> <p>GOAL 13: Climate Action</p> <p>GOAL 14: Life Below Water</p> <p>GOAL 15: Life on Land</p> <p>GOAL 16: Peace and Justice Strong Institutions</p> <p>GOAL 17: Partnerships to achieve the Goal</p>
LDP Vision and Objectives pg 45, 46, 47	<p>b(v) We need to be clear minerals should not include gold mining as the council have passed a motion against gold mining</p> <p>b Grow the green economy</p> <p>c(iv) broader than religious backgrounds, inclusive of all section 75 minority groups</p> <p>c(vii) firstly should this not be in part d under the environment. Also reword 'to ensure the maximal implementation of the Zero Waste Circular Economy Strategy reducing the kg of waste produced per inhabitant and increasing our recycling targets and quality of our recycle'</p>

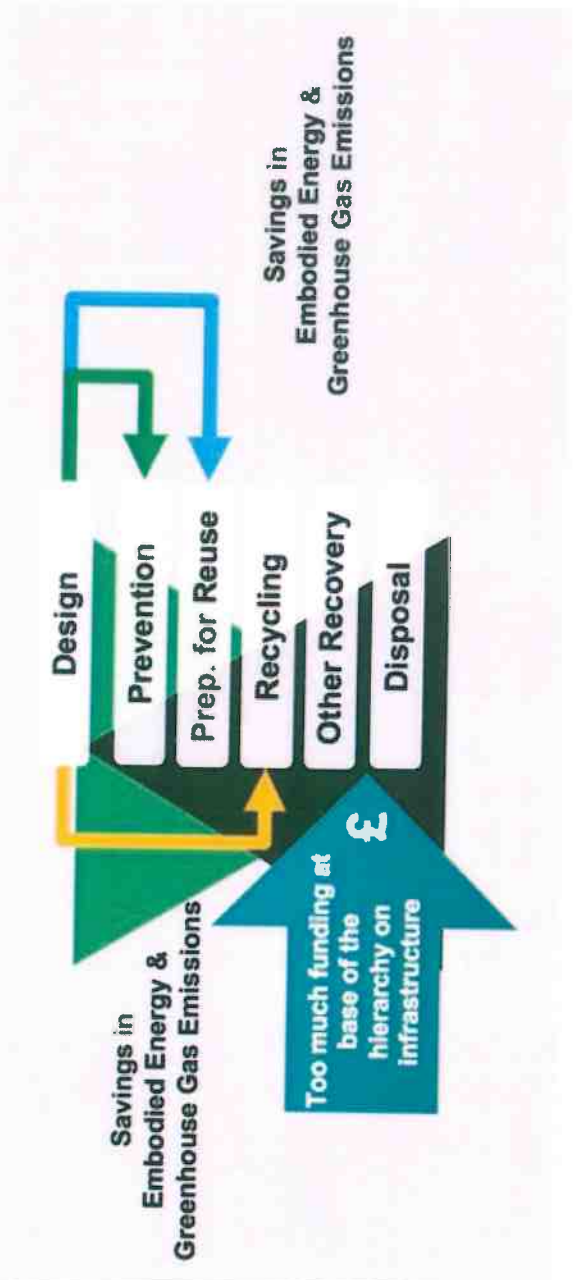
<p>General development principles and policy pg 76, 78 and 91</p>	<p>d (iii) rather than power use ‘renewable energy’</p> <p>GDP 2 Climate change</p> <p>(iv) rather than just facilitate: invest in, design for and lobby for sustainable travel inclusive of active travel and public transport in preference to the private car</p> <p>(vi) reword with the removal of heat from waste – supporting the delivery of facilities needed to divert waste away from landfill and promote redesign, prevention, preparation for reuse, recycling and other recovery and disposal in line with the zero waste circular economy strategy</p> <p>(viii) add in proper monitoring</p> <p>GDP 3 Improving health and well being</p> <p>(v) rather than do not significantly adversely impact air quality, we need to’ improve air quality everywhere and monitor thoroughly’</p> <p>7.6 ancient woodland coverage needs to be mentioned here. NI has only 0.04% of ancient woodland. Native woodland needs to be redeveloped to help regenerate our land. We should have a target of increasing native woodland coverage in our council area. It needs to be broken down between native woodland and other forests</p>
<p>Part C</p>	<p>General comment – there should be a section on the green economy given that it is the fastest growing economy in Europe. And this is not to greenwash this area, the green economy needs to have sound environmental benefits. The circular economy also needs to be central to the economic development of the region. A recent report indicates that through embracing the circular economy, more than 13,000 jobs at various skill levels could be created across Northern Ireland, and within a number of sectors, including food and drink, biorefining and the bioeconomy.</p>
<p>Part C Minerals Development</p>	<p>DCSDC have passed a motion opposing gold mining and the mining of other precious metals and minerals.</p> <p>At no point in previous Local Development Plans or RDS was precious metals and minerals even considered. Minerals Development, in terms of sand and aggregates, was considered in a sustainable, manner being sympathetic to the environment. The DSDC has essentially side-lined The Sperrins as an integral element of the tourism strategy, which has the potential to secure our economic livelihoods and our environment for generations to come. The LDP must be rewritten, all reference to precious metals and minerals removed. The DSDC has only experience of Minerals Development – aggregates, sand and gravel. There has never been any precious metal and mineral processing in DSDC, which</p>

	<p>requires a chemical processing element. This is an entirely more complex process requiring full environmental, health and economic assessments. Please remove any reference to valuable minerals and mining.</p> <p>The plan for minerals development fails the Habitats Directive “on the conservation of natural habitats and of wild fauna and flora”. Essentially the Local Development Plan attempts to develop minerals development at the expense of our AONB, Natura 2000 sites, SPAs, SACs and Ramsar Sites.</p>
<p>Tourism development pg 182</p>	<p>The entire Sperrins area should seek National Park status, as intended by Alex Attwood in 2012. With the proper funding The Sperrins has the potential to become one of the most visited eco-tourism destinations in Ireland.</p>
<p>Waste Planning pg 309</p>	<p>Firstly the title should be ‘Zero Waste Planning’ given that the council unanimously adopted the zero waste circular economy strategy.</p> <p>This section needs a total redraft. Throughout this section we talk of waste management when we should be talking about our ‘transition to zero waste’. This section is very disappointing given the council’s commitment to delivering the zero waste circular economy strategy. Even in the environmental impact of a waste management facility (pg312) there is no requirement that it must be in line with the zero waste circular economy strategy. The whole chapter is focused on the bottom tiers of the zero waste hierarchy when our focus needs to be at the top of the hierarchy. This involves, in order of priority, seeking to prevent waste from arising in the first place, encouraging its preparation for re-use, and prioritising separate collection of waste for recycling and composting / digestion. Any residual waste that cannot be dealt with through these means should be treated before disposal so that the environmental impact of final disposal is minimised. This approach understands that design of products hugely influences the potential to prevent waste by extending product life (which also facilitates reuse and preparation for reuse), and by facilitating easy disassembly and thus recycling of its constituent resources</p> <p>Zero Waste North West wish to be consulted on the redraft of this particular section.</p> <p>Some glaring omissions:</p> <p>The definition of zero waste needs to be included:</p>

“Zero Waste is the conservation of all resources by means of responsible production, consumption, reuse and recovery of products, packaging and materials without burning, and with no discharges to land, water, or air that threaten the environment or human health ”

Definition of Zero Waste as adopted by the Zero Waste International Alliance

The whole chapter is focused on the bottom tiers of the waste hierarchy where less of the focus should be. The Waste hierarchy needs amended to become the ‘Zero Waste Hierarchy’ as below:



Zero Waste Planning continued...

Reference needs made to "The Waste Prevention Programme for Northern Ireland – The Road to Zero Waste"(2014). In point 20.3 you have referenced an older strategy which is outdated. The revised Waste Framework Directive changes the focus from the previous Directive by moving waste management up the waste hierarchy from disposal at the bottom to waste prevention at the top. In the revised WFD, the priority within the waste hierarchy is for ‘Waste Prevention’ followed by ‘re-use’ and ‘preparing for re-use’.

An example of how the focus could be brought to the top of the hierarchy is the inclusion of policies such as the SUP Directive. The “Directive on the reduction of the impact of certain plastic products on the environment” (commonly referred to as the Single-Use Plastics (SUP) Directive) entered into force on 2 July 2019. It aims to tackle pollution from single-use plastics (and fishing gear), as the items most commonly found on European beaches. The SUP Directive urges a transition away from single-use plastics, towards reusable products and systems. It addresses single-use plastic items through a range of policy measures, including market restrictions, consumption reduction, design, collection and labelling requirements and Extended Producer Responsibility (EPR) schemes, depending on the item and available alternatives. The Directive applies to all single-use items listed, including single-use plastic items that are bio-based and/or that are biodegradable or compostable, as well as those made of different materials (multi-layered or composite materials), such as plastic-coated paper or plastic-lined cartons. It foresees EU-wide bans for 15 items (plates, cutlery, straws, etc.) from July 2021, as well as consumption reduction for food containers and beverage cups. The Directive offers the opportunity to scale-up reusable alternatives rather than simply switching to single-use products made of another material.

There are no statistics or key indicators of our current recycling rates, where our recycling goes to, how much we landfill, targets for recycling and the reduction of kg of waste per inhabitant produced.

There are a number of reproprocessors of secondary materials based in Northern Ireland (notably Huhtamaki, Cherry Plastics and Encirc). Nonetheless, at present, more than 90% of dry recyclable materials handled by DCSDC are exported, some being sent elsewhere within the UK and some travelling much further afield. This implies a loss of potential value added, and employment opportunities, from the local economy. The sorting facility used to separate mixed dry recyclables into clean material streams is currently based outside the authority area, which also implies a loss of potential employment to the area (employment in the authority area would increase if the collection service were changed, or if sorting took place more locally, ideally at source). Increasing recycling rates can further increase secondary materials available for local reprocessing, though the likelihood of materials being reprocessed locally will be greatest where the quality of material collected is high. There is a strong relationship between the quality of the recyclates recovered and the

	<p>prospect of maximising the extraction of social value including job creation. Why is this not mentioned at all?</p> <p>The illegal landfill site Mobyuoy needs to be addressed and this should be developed with the NIEA who are working on the remediation of this site. There is no reference to Mobyuoy that we could find throughout the LDP.</p>
<p>Monitoring Criteria and Review Process page 471 and throughout</p>	<p>The review and monitoring of the ldp will not be sufficient to met the needs of communities it seeks to serve or the climate and planetary boundaries it needs to respect unless a fundamental shift in the planning process is developed.</p> <p>Across the world there is an emerging approach called Rights of Communities and Rights of Nature which we believe should be incorporated into the monitoring and review process of this ldp.</p> <p>Rights of Communities – if a community does not want an incinerator, factory farms, goldmining, a new road or a toxic waste site the rights of that community needs to be respected. If a community demands for example, the clean-up of a toxic waste site, those demands need to have legal force. New structures of legal authority recognizes and protects the inalienable rights of natural and human communities. These inalienable rights should be identified and recognised in the ldp. This is happening across the world and for example, in the US nearly 200 communities have adopted these new laws and policies, known as Community Bills of Rights. They protect rights by banning harmful corporate activities ranging from coal mining to factory farms to fracking to mineral mining.</p> <p>Rights of Nature - The United Nations has warned that we are heading toward major planetary catastrophe. For this reason, there is a growing recognition that we must fundamentally change the relationship between humans and nature. Nature should not be treated as property but recognised for having intrinsic rights – this may include the right of the Faughan not to be dammed, the salmon of the Foyle to migrate freely and be allowed to returned to a healthy river, the right of people to drink river water than is not polluted, the right of the air to be clean and for people to breathe clean air. Ecosystems must be recognised as having the rights to exist, flourish, evolve and regenerate.</p>

Making this fundamental shift means acknowledging our dependence on nature and respecting our need to live in harmony with the natural world. It means securing the highest legal protection and the highest societal value for nature through the recognition of nature's rights in the ldp. A declaration on the rights of nature must be developed by the council and then used to measure and monitor the performance of the ldp