

Response to the comments made during the consultation on the draft NLWP at Regulation 18 stage

No	Question	Summary of representations	Changes to the NLWP
Q1:	Do you agree with the proposed Aim for the draft NLWP? If not, please suggest an alternative.	There was general support for the draft Aim of the Plan. Some textual changes were suggested including a stronger commitment to achieving net self-sufficiency.	The commitment to net self-sufficiency has been clarified and strengthened.
Q2:	Do you agree with the proposed Draft Objectives for the draft NLWP? If not, please suggest an alternative and/or additional objectives.	There was general support for the draft Objectives. In addition to textual changes, suggestions included an additional objective to protect the amenity of local residents, better links with other parts of the Plan, giving weighting to the objectives and a stronger commitment to achieving net self-sufficiency.	The commitment to net self-sufficiency has been clarified and strengthened. Protection of amenity is already covered by SO4 and so has not been changed but later on in section 4 The spatial framework, part E on protecting local amenity has been strengthened
Q3:	Do you agree with the draft spatial strategy for the NLWP? If not, please provide further detail and any alternative approaches.	<p>There was general support for the draft spatial strategy. In addition to textual changes, suggestions included improving consistency and links with other parts of the Plan and double-checking that most up to date information on licenced facilities is used. It was noted that it is not possible to assess sites against non-spatial criteria of the spatial strategy.</p> <p>Conflicting comments were received in relation to the use of waterways to carry waste. The Canal & River Trust, the Commercial Boat Operators Association, organisations such as Sustainable Hackney and one local resident support the use of waterways for the movement of waste materials. This is because it can contribute to reducing road congestion and pollution and is supported by national and regional policy. However, many residents and residents' associations do not support use of the canal or river for</p>	<p>Latest data on licenced waste facilities from the Environment Agency has been used and links to the remainder of the plan have been updated.</p> <p>Export of waste was an example of a non-spatial criteria and this has been removed as spatial principle. The "spatial strategy" of the draft NLWP has been changed to a "spatial framework" and the section has been updated to provide the strategic direction for the detailed policies of the NLWP and to inform site/area selection. The spatial framework also guides the assessment of the suitability of windfall sites under Policy 3.</p> <p>Changes to the spatial framework include embedding the principles of sustainable development and proximity. There is consideration of how to balance the benefits of co-location of facilities, encouraging a more circular economy against the cumulative impacts which can arise from an accumulation of facilities in one</p>

		<p>transporting waste, fearing pollution and a negative impact on biodiversity. Some comments also raised the issue of the practicalities of accessing waste facilities from the waterways and how this would affect the waterway's leisure/amenity use for local residents. The NLWA add that the NLWP should make clear that transporting waste by water over short distances may not be the most commercially viable option.</p>	<p>location.</p> <p>On sustainable transport, the transfer of waste by water is still supported but this is tempered by noting the likely high cost of investment in new wharves.</p>
<p>Q4:</p>	<p>Do you agree with the NLWP taking forward the Preferred Options of Option B: Growth, Option II: Maximised Recycling to meet Option 3: Net self-sufficiency for LACW, C&I and C&D waste streams? If not, please state why and suggest an alternative option.</p>	<p>This is one of the most technical parts of the NLWP and many local residents expressed confusion at the information presented. Clearly further work is required to explain how the capacity gap has been calculated. On the whole, the approach was supported by those in the field of waste planning. One representor suggested that further options are considered. It was also suggested that further modelling work is required on the re-classification of transfer stations, the impact of the circular economy and in light of new information from NLWA. It was also suggested that the Plan should contain more information about exempt sites.</p>	<p>The boroughs have taken the opportunity to reassess the preferred option in the light of the targets in the draft London Plan and other changes. A revised option appraisal paper has been prepared. As a result the section in the plan dealing with this has been shortened and improved to demonstrate how the capacity gap has been calculated.</p> <p>A revised data study has been carried out which has modelled higher recycling options. The revised data study has used the most up to date available data from a variety of sources.</p> <p>The contribution of exempt sites to capacity has been considered in the NLWP data study. The unreliability of the data means it has not been included, although it is assumed significant amounts of CD&E will continue to be managed through exemptions, without ever being recorded.</p> <p>The Plan has greater coverage of the circular economy including of the route map for London by the London Waste and Recycling Board.</p>
<p>Q5:</p>	<p>Do you agree with how waste</p>	<p>Most of the detailed comments on this section were from waste</p>	<p>The 'Provision for North London's Waste to 2032' part of the plan in</p>

	<p>management needs will be met as set out in 'Provision for North London's Waste to 2032'? If not please suggest alternative approach.</p>	<p>planning authorities (WPAs) who currently receive waste exports from North London. More information on the management and export for each type of waste was requested, particularly CD&E and hazardous waste. It was also suggested that this section include more information about how the NLWP is reducing exports.</p>	<p>section 7 has been turned into the strategic policy for the NLWP. The strategic policy considers provision up to 2035.</p> <p>The boroughs have continued to liaise with WPAs who receive significant amounts of waste from North London. A key part of the NLWP is to manage more waste in North London and to reduce exports. The adopted approach of net self-sufficiency does mean that there will continue to be exports and imports, especially given the lack of landfill facilities in North London. The revised data study includes the latest data on hazardous and CD&E waste. Revised forecasts of exports have been carried out. The NLWP has identified areas where built waste facilities could come forward over the plan period. Such facilities will help facilitate the movement of waste up the hierarchy and reducing our reliance on landfill, and ultimately export of waste outside of North London.</p>
<p>Q6:</p>	<p>Do you agree that the above described methodology used to identify potential sites and areas for future waste development is justified and proportionate? If not why not? Please provide an alternative approach.</p>	<p>The methodology for identifying new sites and areas was broadly supported, although the resulting sites/areas were often not. Residents felt very strongly that waste facilities should be located well away from residential areas. It was clear from the comments that residents were not familiar with the types of waste facility which could be built in North London or their potential impacts. More information on types of waste facility needs to be included in the Plan. Some representors felt that too much land had been identified and that sites in 'Band B' should be prioritised. Other representors felt that all industrial areas should be considered suitable.</p>	<p>The methodology for assessing new sites and areas has been largely unchanged. Further detailed work has been done to review the sites and areas under consideration for the proposed submission plan including identifying the potential impacts of the proposed Opportunity Areas in the London Plan and the location of stations which will form Crossrail 2. Work has included searching for new areas of land to consider; taking on board information given during the consultation, doing a desk top study to ensure that information on areas is more comprehensive and up to date, dealing with the implications of policy changes on areas in borough local plans that have been progressed, updating</p>

		<p>One representor felt that consolidation of a number of smaller sites should also be considered.</p>	<p>the area proformas, revisiting the areas for assessment, considering the areas as part of the Sustainability Appraisal and Habitats Regulation Appraisal that accompany the proposed submission version, and undertaking a Flood Risk Sequential Test on the proposed areas.</p> <p>The boroughs do not consider it useful to include more information on types of waste facility in the plan which is already lengthy. Information on facility types will be provided on the NLWP website.</p> <p>The Plan does not propose any specific consolidation of waste sites as this is a commercial decision to be taken by the existing operators, but such consolidation would be possible under the NLWP policies.</p> <p>How the list of sites and areas has changed in the light of consultation is considered in the response to Questions 8 and 9 below.</p>
	New policy suggestions	<p>Comments included suggestion for new policies including incorporating recycling facilities in new development, waste water and landfill/landraising.</p>	<p>Each borough has detailed policies on storage and collection of waste and recycling in new development so the NLWP does not duplicate them.</p> <p>There is a new policy 7 on waste water treatment works and sewage plant and a new policy 8 on control of inert waste</p>
Q7:	Do you know of any existing waste facilities which are not included in Schedule 1 in Appendix 1? If so, please provide details.	<p>There was strong support for Policy 1: safeguarding of existing sites. It was suggested that this policy could include expansions to existing facilities.</p>	<p>Policy 1 has been amended to allow expansion of existing waste premises in appropriate circumstances.</p> <p>Another amendment to policy 1 is to introduce the 'Agent of Change' principle. This principle, which is contained in both the NPPF and the draft London Plan, places the</p>

			responsibility of mitigating the noise impact (from existing noise-generating businesses) on the proposed new development. Developers proposing non-waste development in close proximity to existing waste sites should be aware of the potential impacts on existing waste operations and plan this into their development so as not to prevent or prejudice the continued waste use.
Q8: Q9:	<p>Do you agree with the draft policies for development on new sites and areas? If not, please provide reasons why and suggest an alternative.</p> <p>Do you have any comments on the accuracy of the details in the sites and areas proformas in Appendix 2? Do you have any additional sites or areas you wish to put forward for consideration?</p>	<p>Around 70% (148) of the comments received were objections to sites and areas. A number of proposed sites and areas which have been assessed as potentially suitable for waste uses through the NLWP assessment criteria were not considered suitable by local residents and community groups. The main issues raised by residents related to the potential negative impacts of a waste facility in the local area, including traffic/congestion, suitability of roads and access, effect on biodiversity, flood risk, proximity to sensitive receptors and residential areas, concern over noise, smell, pollution, vermin etc. A number of objections by landowners and tenants were also received.</p> <p>Residents in more densely populated areas of North London wish to see locations for new waste facilities in less densely populated areas and away from residential areas. Comments also expressed support for the aim to co-locate facilities and enlarge existing facilities which helps to minimise conflict with uses such as residential. However, other representors want to see a wide geographical distribution of facilities in order to manage</p>	<p>As the selection of new sites and areas was the most controversial part of the draft NLWP, the boroughs have given careful consideration to the points made about them during the consultation.</p> <p>The information contained in representation on individual sites and areas has been carefully considered. As mentioned under question 6 above, the boroughs undertook further work to expand and update information on all sites and areas.</p> <p>As well as improving information on sites and areas, the boroughs also considered which sites and areas were most suitable and how much land was required to deliver the NLWP.</p> <p>The revised approach to new land in the proposed submission version is to focus on existing, well-established industrial land, and areas which performed well against the assessment criteria, while achieving a better geographical spread across the plan areas as well as recognising the impact of developments such as Crossrail 2 and the London Plan Opportunity areas. It also took account of progress made in each borough's Local Plan which would impact on proposed allocations as</p>

		<p>waste near to its source. The waste industry would like to see all industrial land included as potentially suitable for waste development.</p> <p>Some residents also suggested waste sites should be on the outskirts of North London or outside of North London entirely. However, the surrounding WPAs want to see more facilities within North London to deal with the area's own waste.</p> <p>The North London Waste Authority (NLWA) submitted the land at Pinkham Way in response to the call for sites. The land was assessed against the sites/areas assessment criteria and was found to be suitable for some waste facilities. However, number of residents, politicians and community groups consider Pinkham Way site to be unsuitable for waste use on a range of grounds including viability and are challenging the ability of the site to be brought forward for waste use by the NLWA.</p>	<p>well as any development which had taken place which could affect the suitability of waste uses in that location. Consideration of all these points has resulted in a number of areas being removed from further consideration for waste use in the NLWP.</p> <p>With the exception of Pinkham Way (discussed below), the remaining areas identified for new land are designated as either Strategic Industrial Locations (SIL) or Locally Significant Industrial Sites (LSIS) in the London Plan and Local Plans. These are recognised industrial and employment areas where waste uses are normally suitable and is in keeping with the approach set out in the London Plan. In addition' in the site assessment process carried out for the NLWP, the areas in the proposed submission version are all in the higher scoring band B and band C categories .</p> <p>Pinkham Way was put forward by the North London Waste Authority (NLWA) during the call for sites as necessary for the delivery of the NLWA's waste strategy. Pinkham Way has a dual designated as an employment site and a site of nature conservation interest in the Haringey Local Plan. Following the NLWP site assessment, it is considered as suitable for waste management and is in the list of new areas under policy 2.</p> <p>Since the draft NLWP, the last remaining new site is the subject of a live planning application as a replacement site for the NLWA's transfer operations at Hendon. Policy 2 only considers new <i>areas</i> which are potentially suitable for waste management.</p>
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Q10:	<p>Do you agree with the inclusion and provision of the policy on unallocated sites? If not, please provide an alternative approach.</p>	<p>There was general support for this policy, although some respondents expressed concern that sites could come forward near residential areas. Suggested changes included clearer referencing and definitions of criteria used to assess unallocated sites and renaming the policy 'unidentified' or 'windfall' sites.</p>	<p>Policy 3 has been renamed 'Windfall sites'. It has been redrafted to demonstrate that the boroughs' preference is for waste development to take place either on an existing waste site or on a site within the areas considered potentially suitable for waste use identified in policy 2. If a windfall site does come forward, developments will be assessed against the site criteria used for the NLWP site selection process and against the NLWP spatial framework in addition to the other policies in the plan. Waste developments on windfall sites should not compromise wider regeneration proposals such as those around major new transport infrastructure and should demonstrate the need for the facility in that location over the areas identified in the NLWP.</p>
Q11:	<p>Do you agree with the locations identified as being in need for new Re-use & Recycling Centres?</p>	<p>There was general support for improving RRC coverage across North London. However, many respondents were not clear where the "areas of identified need" for new RRCs were. The supporting text needs to include more detail on this. It was</p>	<p>The areas of identified need have been set out in policy 4 and are displayed in Figure 7. Details of the proposed new RRC at Edmonton EcoPark are set out in the text.</p>

		noted that a new RRC at Edmonton EcoPark is proposed.	
Q12:	Do you agree with assessment criteria for waste management facilities and related development? If not, please suggest alternatives.	There was broad support for this policy although a number of changes were suggested to strengthen requirements or for clarification. Competing views were received from residents who want strict controls on development alongside ambitious objectives, and the waste industry who consider some of the requirements in the policy too onerous.	<p>There have been some additions and clarifications within policy 5. There has been greater clarification of the heritage assets and landscape character to be considered. There are new criteria dealing with environmental permits, health impacts, cumulative impacts, job creation and circular economy statements.</p> <p>The text underneath the policy has been updated to reflect the latest guidance and good practice in these areas.</p> <p>At waste industry request, the presumption that waste facilities should be enclosed could be partly relaxed for any waste activities where the developer can demonstrate that it will not cause noise or dust eg storage.</p>
Q13:	Do you agree with the proposed approach to Energy Recovery and Decentralised Energy? If not, please suggest an alternative.	There was broad support for this policy, although the waste industry considers some of the requirements too onerous as currently written and suggested a number of changes	The boroughs acknowledge that the original draft of this policy was confusing and led to misunderstanding of what was required. The revised policy 6 is more focused on the expectations and the requirements.
Q14:	Do you agree with the proposals for monitoring the NLWP and the roles and responsibilities of the bodies involved in implementing it? If not, please state why and suggest an alternative.	A number of suggestions about monitoring the NLWP were received. This included clarity on who is responsible for monitoring. Additional monitoring indicators were also suggested.	The monitoring indicators have been reviewed and updated and it is clarified that it is individual borough's responsibility to monitor the plan.