CABINET

Tuesday, 21 June 2022 6.30pm- George Meehan House, 294 High Road, Wood Green, N22 8JZ

(watch the live meeting Here, watch the recording here)

Members: Councillors Peray Ahmet (Chair), Mike Hakata, Zena Brabazon, Dana Carlin, Seema Chandwani, Lucia das Neves, Julie Davies, Ruth Gordon, Adam Jogee and Sarah Williams.

Quorum: 4

1. FILMING AT MEETINGS

Please note that this meeting may be filmed or recorded by the Council for live or subsequent broadcast via the Council's internet site or by anyone attending the meeting using any communication method. Although we ask members of the public recording, filming or reporting on the meeting not to include the public seating areas, members of the public attending the meeting should be aware that we cannot guarantee that they will not be filmed or recorded by others attending the meeting. Members of the public participating in the meeting (e.g. making deputations, asking questions, making oral protests) should be aware that they are likely to be filmed, recorded or reported on.

By entering the meeting room and using the public seating area, you are consenting to being filmed and to the possible use of those images and sound recordings.

The chair of the meeting has the discretion to terminate or suspend filming or recording, if in his or her opinion continuation of the filming, recording or reporting would disrupt or prejudice the proceedings, infringe the rights of any individual or may lead to the breach of a legal obligation by the Council.

2. APOLOGIES

To receive any apologies for absence.

3. URGENT BUSINESS

The Chair will consider the admission of any late items of Urgent Business. (Late items of Urgent Business will be considered under the agenda item where they appear. New items of Urgent Business will be dealt with under

Item 13 below. New items of exempt business will be dealt with at Item 17 below).

4. DECLARATIONS OF INTEREST

A Member with a disclosable pecuniary interest or a prejudicial interest in a matter who attends a meeting of the authority at which the matter is considered:

(i) must disclose the interest at the start of the meeting or when the interest becomes apparent, and
(ii) may not participate in any discussion or vote on the matter and must withdraw from the meeting room.

A Member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Register of Members' Interests or the subject of a pending notification must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal interests and prejudicial interests are defined at Paragraphs 5-7 and Appendix A of the Members' Code of Conduct.

5. NOTICE OF INTENTION TO CONDUCT BUSINESS IN PRIVATE, ANY REPRESENTATIONS RECEIVED AND THE RESPONSE TO ANY SUCH REPRESENTATIONS

On occasions part of the Cabinet meeting will be held in private and will not be open to the public if an item is being considered that is likely to lead to the disclosure of exempt or confidential information. In accordance with the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 (the "Regulations"), members of the public can make representations about why that part of the meeting should be open to the public.

This agenda contains exempt items as set out at Item 15: Exclusion of the Press and Public. No representations with regard to these have been received.

<u>This is the formal five clear day notice under the Regulations to confirm that this Cabinet meeting will be partly held in private for the reasons set out in this Agenda.</u>

6. MINUTES (PAGES 1 - 44)

To confirm and sign the minutes of the meeting held on 8 March 2022 as a correct record.

7. MATTERS REFERRED TO CABINET BY THE OVERVIEW AND SCRUTINY COMMITTEE

8. DEPUTATIONS/PETITIONS/QUESTIONS

To consider any requests received in accordance with Standing Orders.

9. NORTH LONDON WASTE PLAN (PAGES 45 - 454)

The report of the Director for Housing, Regeneration and Planning. To be introduced by the Cabinet Member for Housing Services, Private Renters and Planning.

This report recommends adoption by Full Council of the North London Waste Plan (NLWP). The NLWP has been subject to an Examination in Public by an independent Planning Inspector and has been found sound, subject to Main Modifications.

10. DECISION TO BEGIN REHOUSING OF STAPLEFORD NORTH (PAGES 455 - 526)

The report of the Director for Housing, Regeneration and Planning. To be introduced by the Cabinet Member for Council House Building, Placemaking, and Development.

Report to authorise the rehousing and leaseholder buy-backs at Stapleford North on Broadwater Farm. Financial resource approval for leaseholder negotiations. Report follows previous authorisations in July 2021 and September 2021 and a Section 105 consultation with affected residents.

11. ESTABLISHMENT OF THE CORPORATE PARENTING COMMITTEE, APPOINTMENT OF CABINET MEMBERS TO COMMITTEES AND PARTNERSHIPS 2022-23, AND CONFIRMATION OF TERMS OF REFERENCE (PAGES 527 - 566)

Report of the Monitoring Officer. To be introduced by the Leader.

Cabinet is asked to agree the establishment of the Corporate Parenting Advisory Committee, the appointment of members to Committees and Partnerships in 2022-23, and to confirm Terms of Reference.

12. MINUTES OF OTHER BODIES (PAGES 567 - 670)

To note the minutes of the following:

Cabinet Member Signing
4 March 2022
7 March 2022 (9am, 10am, and 12pm)
8 March 2022
10 March 2022 (10am and 2pm)
18 March 2022 (10am, 10.30am, 11am, 12pm, 1pm, and 4pm)
31 March 2022 (9.30am and 10am)

22 April 2022
3 May 2022
4 May 2022
11 May 2022
31 May 2022

Urgent Decisions
18 March 2022
31 March 2022

13. NEW ITEMS OF URGENT BUSINESS

As per item 3.

14. EXCLUSION OF THE PRESS AND PUBLIC

Note from the Democratic Services and Scrutiny Manager

Items 15-16 allow for consideration of exempt information in relation to items 6 and 10.

TO RESOLVE

That the press and public be excluded from the remainder of the meeting as items 16-17 contain exempt information as defined under paragraphs 3 and 5, Part 1, Schedule 12A of the Local Government Act 1972:

Information relating to the financial or business affairs of any particular person (including the authority holding that information).

Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

15. DECISION TO BEGIN REHOUSING OF STAPLEFORD NORTH - EXEMPT (PAGES 671 - 674)

As per item 10.

16. EXEMPT - MINUTES (PAGES 675 - 678)

To confirm and sign the exempt minutes of the meeting held on 8 March 2022 as a correct record.

17. NEW ITEMS OF EXEMPT URGENT BUSINESS

As per item 3.

Ayshe Simsek, Democratic Services and Scrutiny Manager / Fiona Rae, Acting Committees Manager
Tel – 020 8489 2929 / 020 8489 3541
Email: ayshe.simsek@haringey.gov.uk / fiona.rae@haringey.gov.uk

Fiona Alderman
Head of Legal & Governance (Monitoring Officer)
George Meehan House, 294 High Road, Wood Green, N22 8JZ

Monday, 13 June 2022

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Agenda Item 6

MINUTES OF MEETING Cabinet HELD ON Tuesday, 8th March, 2022, 6.30 - 9.35 pm

PRESENT:

Councillors: Peray Ahmet (Chair), Mike Hakata, John Bevan, Zena Brabazon, Seema Chandwani, Lucia das Neves, Julie Davies, Isidoros Diakides, Erdal Dogan and Ruth Gordon

ALSO ATTENDING Virtually – Cllr Cawley- Harrison and Cllr Ejiofor.

744. FILMING AT MEETINGS

The Chair referred to the information as set out in the agenda and advised that the meeting was being filmed.

745. APOLOGIES

There were apologies for lateness from Cllr Chandwani.

746. URGENT BUSINESS

There were no items of urgent business.

747. DECLARATIONS OF INTEREST

Councillor Isidoros Diakides declared a personal interest and non-pecuniary interest in relation to items 21 and 27 as he was a Council representative in relation to an organisation that was currently located in the Chocolate Factory. He clarified that he would not be taking part in the discussion nor voting, in accordance with section 6.1b of the Member Code of Conduct and would leave the room for the duration of these items.

748. NOTICE OF INTENTION TO CONDUCT BUSINESS IN PRIVATE, ANY REPRESENTATIONS RECEIVED AND THE RESPONSE TO ANY SUCH REPRESENTATIONS

No representations were received.

749. MINUTES

RESOLVED
To approve the minutes of the meeting held on the 8th of February 2022.

750. MATTERS REFERRED TO CABINET BY THE OVERVIEW AND SCRUTINY COMMITTEE

No matters were referred to Cabinet by the Overview and Scrutiny Committee.

751. DEPUTATIONS/PETITIONS/QUESTIONS

The Leader had met with, and received representations from, tenants in the row of Homes for Haringey Houses on Woodside Avenue who wanted to put forward their support for the recommendations at agenda item 17 on the consideration of the proposals for the development of the site of the former care home at 100 Woodside Avenue and the Terraces at 102 to 108 and 110 to 116 Woodside Avenue.

752. HARINGEY SCHOOL TRAVEL ASSISTANCE POLICY

The Cabinet Member for Early Years, Children and Families introduced the report which sought Cabinet approval to undertake public consultation on the Haringey School Travel Assistance Policy for home to school transport for children and young people with Special Educational Needs and Disabilities (SEND).

The main improvements to the policy were outlined, including: detailed explanation of how home to school transport decisions were to be made, standardisation of disputes and appeals, ensuring that transport was sustainable, clarification of personal budgets and how they are calculated for transport support and exceptional circumstances where can be transport provided.

In response to questions from Cllr Hakata and Cllr Cawley – Harrison the following information was provided:

- Regarding input of parents and carers to the strategy, it was noted that a parent and carer were involved in the stakeholder group for the development of this policy. At the outset, the service had written to all 608 parent /child households that received the service to get their views. An informal questionnaire was shared and 68 parents responded. The policy responded to various feedback received since September 2021.
- Going forward, the Travel service were working with the Policy team to ensure the consultation on the policy was accessible as possible, promoted through SEND newsletter, and considered in existing consultation meetings at schools .
- Noted that there were 20 children/ young people that do not have SEND or disabilities and received the service based on exceptional circumstances concerning their family circumstance. An example was provided.
- Responding to a question on when exclusion from transport will be necessary, it was noted that the service will take into consideration potential impact on the safety of others within the transport. Over the last year , this issue was considered less than 10 times and had not resulted in exclusion. The focus was on better understanding the needs of the young person and on the few occasions that this was necessary alternative provision was provided for a limited time.

- Due to complexities of children receiving this service , current covid measures remained in place , with staff wearing PPE and applying safety regulations. This would be reviewed in due course.

RESOLVED

1. To approve a consultation on the proposed changes to the Haringey Travel Policy (2018-2020) (Appendix 5) now proposed to be referred to as School Travel Assistance Policy, Children & Young People up to 16 years of Age (Appendix 2) and Post-16 School Travel Assistance Policy (Appendix 3). The consultation to be for a period of 12 weeks from 9 May 2021 to 31 July 2022.

2. To note that a report on the outcome of the consultation be brought back to Cabinet for a final decision on the proposed policy changes.

Reasons for decision

Local processes must have due regard to The Home to School Travel and Transport Statutory Guidance for Local Authorities July 2014 and Post 16 Transport and Travel Support to Education and Training Statutory Guidance 2019. Under the Act and the Guidance, the Council must consult widely with interested parties on any proposed changes to their home to school travel arrangements policy statements for children, young people and adult learners.

A key change is that the current School Travel Policy title has been amended to the 'School Travel Assistance Policy (Children & Young People up to 16 years of Age)' and 'Post-16 School Travel Assistance Policy'

The main changes to the current policy are as follows:

a) consideration of sustainability, focusing on the environment, emissions reduction, and promotion of independent travel options.
b) creating a specific policy for young people aged 16-25, including information about external travel support.
c) introduction of behavioural standards for children and young people using transport commissioned by the Local Authority.
d) detailed explanation of the transport decision making process.
e) standardisation of disputes and appeals process in accordance with statutory guidance.
f) clarification regarding 'personal travel budgets' and how they are calculated.
g) comprehensive application procedure and guidance.
h) clarity around breakfast/ after school clubs and times when Haringey Council will provide transport.
i) cut off deadlines for applications with exceptional circumstances included
j) COVID-19 information in relation to home-school transport

These policy changes will need to be subject to full public consultation via an on-line consultation form published on the Haringey SEND Local Offer web site for a period of 12 weeks to ensure that families, schools and other parties have sufficient time to respond to the proposed changes.

The consultation will be promoted via the SEND Newsletter, Special Schools and Parent Carers Forum and a range of other relevant networks within the education, health and care sector.

Alternative options considered

Not applicable.

753. EARLY YEARS STRATEGY

The Cabinet Member for Children and Families outlined that a child's early year's experiences can influence their development and outcomes in life. She advised that it was essential to provide high quality early education and childcare. Furthermore, to ensure that there was early intervention for children who a were vulnerable or who have special needs.

She outlined that the Council had a strong record in directly providing this high-quality provision, and of supporting other providers in this work, with over 99% of settings graded good or outstanding by Ofsted. The draft strategy attached, aimed to shape and strengthen the service, which supports children, parents, carers and families.

It was further noted that the consideration of the attached report was a first step in the decision-making process and subject to approval of the recommendations, the strategy would go out to public consultation for further refinement.

Following questions from Cllr Hakata and Cllr Cawley – Harrison, the following was noted:

- Recognised the importance of early years in the borough and this required the 90-day consultation to be effective and far reaching. The Council wanted to reach communities which were commonly deemed hard to reach and the example of good work with the Somali community was referred to . Also there was a Council bid for £1.2m for family hub project which would in turn compliment and support engagement and support to families in the borough.
- An engagement event with Somali community was planned for 29th March and there would be events with other communities. There would be continuing engagement to make sure there was access to services that the Council provide.
- The overall aim was to build on the Council's existing strengths of community engagement and work closely with all communities as well.
- With regards to contingency planning for any future wave of covid , it was noted that most early years settings had remained open during pandemic. Currently, the planning was for early years settings to remain open in any potential future wave. The service had experience of quickly adapting, moving from 'face to face' to online when required.
- In the aftermath of the pandemic, there was focus on providing enhanced support to families that have faced isolation and to develop interactions of children.

- With regards to the objective of stronger relationships with families and how this would happen, this was though engagement and reporting back on actions. Also the service would utilise access to existing forums and partnership settings to seek views on how to shape services and develop the strategy.
- Responding to the point on the specific communities mentioned [Turkish, Kurdish, Jewish and Somali] these were underrepresented communities. The Council were working with these communities to extend and ensure high quality provision. The Triangle Community Centre was engaging with and working with all communities. Attainment was a key consideration and it was hoped by supporting families in the early years setting, this would support them reach the next stage in education journey.

RESOLVED

1. To approve the commencement of a statutory consultation on the Early Years Strategy (attached at Appendix 1).

2. To approve a 90-day period of consultation to commence in May and end in August 2022.

3. To agree that a report on the outcome of the consultation and final proposals for the Early Years Strategy will be submitted to Cabinet in November 2022.

Reasons for decision

Following the Early Years review stakeholders felt that the lack of a dedicated Early Years Strategy led to inconsistency of approach and a reduced focus on the importance of intervening in the early years. The strategy will give a clear focus on early years and provide a distinction between Early Years and Early Help.

The Early Years Strategy would ensure that there is more focus on the developmental benefits of prevention and universal support in the early years.

Alternative options considered

To continue without a strategy; however, was rejected as the strategy will give a clear focus to improving outcomes for the youngest children in the early years and developing wide partnerships across the early years sector. A strategy will enable us to set out aims and priorities and ensure there is a monitoring process in place to keep us on track to achieve them.

Funding for early years provision could be at risk without the outcomes, priorities and benefits being clearly articulated through a strategy.

754. 2021/22 FINANCE UPDATE QUARTER 3

The Cabinet Member for Finance and Transformation introduced the report which provided an update on the Quarter 3 budget monitoring and Council's financial

position. The report also sought approval for any changes to the Council's revenue or capital budgets required to respond to the changing financial scenario and the delivery of the Medium-Term Financial Strategy (MTFS) and a decision relating to the agreement with the London Pension Fund Authority.

In response to questions from Cllr das Neves, and Cllr Cawley- Harrison, the following was noted:

- Regarding the growth of inflation in figures, increases in placement costs in Adults services, and Children's Service were highlighted. An example was provided of significant increased costs for complex placements.
- Overall, there was adequate contingency in the budget for increased inflation costs. This was also one of the pressures accounted for in the coming budget.
- With regards to government funding to cover Covid costs in current year, this was the assumption for this financial year. This had been the case in the previous year and government had followed through with funding and position improved incrementally.
- It was noted that additional surplus generated through CPZ income was ringfenced to transport projects which included concessionary travel. This cost was between £13m to £14m and therefore the Council was always in a net spend situation.
- Agreed to provide Cllr Cawley- Harrison with a written response on why PL 20/25 was amber rather than red RAG rated.

[Cllr Chandwani entered the meeting]

RESOLVED

1. To note the forecast base budget revenue outturn for the General Fund of £9.37m and that Directors are seeking actions to bring the forecast down before the end of the year. (Section 6, Tables 1a and 1b, and Appendix 1).

2. To note that the £12.43m forecast Covid pressure on the GF is expected to be offset by Government funding (Section 6 and Table 1a).

3. To note the net Housing Revenue Account (HRA) forecast of £0.3m overspend (Section 6 and Appendices 1 and 2).

4. To note the net DSG forecast of £6.69m overspend. (Section 6 and Appendix 1).

5. To note the forecast budget savings position in 2021/22 which indicates that £4.9m (46%) may not be achieved. (Section 6 and Appendix 3). This is incorporated in the GF budget pressures addressed in recommendations (1) and (2) above.

6. To approve the proposed budget adjustments and virements to the capital programme as set out in Table 2 and Appendix 6.

7. To note the forecast expenditure of £241.7m in 2021/22 which equates to 51% of the revised capital budget (Section 8 and Appendix 4).

8. To approve the revenue budget virements and receipt of grants as set out in Appendix 6.

9. To note the debt write-offs approved by officers in Quarter 3 2021/22 (Appendix 7) and to approve the debt write-offs greater than £50k in Appendix 7a.

10. To note the C19 grants schedule (Appendix 8).

11. To agree to delegate the authority to enter into a pensions agreement with the London Pensions Fund Authority (LPFA) in relation to historic Greater London Council/Inner London Education Authority pension liabilities, to the Director of Finance, as set out in section 9, and to note that the financial implications are in line with the Medium Term Financial Strategy assumptions.

12. To note the delegated decision made by the Director of Finance to enter into a 'Master Assignment Agreement' with the Secretary of State for Business, Energy and Industrial Strategy (BEIS) for the recovery of debts relating to the Covid 19 business rates grants schemes, as set out in section 10.

13. To approve the allocation of £1.1m from the approved capital programme contingency to the Alexandra Palace and Park Trust for urgent capital works, as set out in section 8.

14. To agree to defer repayment of £0.414m of loan repayments from Alexandra Palace and Park Trust in both 2021/22, and 2022/23, as set out in section 8.

15. To accept the CCG Grant of £1.34m in relation to the Wood Green NHS Hub project, as set out in section 8.

16. To approve a budget virement of £1m Strategic Community Infrastructure Levy from DEN budget to the Wood Green NHS Hub project, as set out in section 8.

17. To accept the GLA grant of £10m in relation to the High Road West scheme, from the Mayor's Land Fund, as set out in section 8.

Reason for Decision

A strong financial management framework, including oversight by Members and senior management, is an essential part of delivering the council's priorities and statutory duties. This is made more critically important than ever as a result of the on going financial implications placed on the Council by the Covid-19 crisis.

Alternative Options Considered

The report of the management of the Council's financial resources is a key part of the role of the Director of Finance (Section 151 Officer) in helping members to exercise their role and no other options have therefore been considered.

755. ROAD DANGER REDUCTION ACTION PLAN AND INVESTMENT PLAN FOR 2022-23

The Cabinet Member for Customer Service, Welfare and the Public Realm introduced the report which sought agreement to an overarching approach to reducing road danger on Haringey's streets (as set out in the proposed Action Plan in Appendix 1) and the specific recommendations for investment in 2022/23 (as set out in the Investment Plan in Appendix 2).

In response to questions from Cllr Cawley – Harrison, the following information was noted.

- The intention of the Council was to remove the existing higher than 20miles per hour roads and there was a timeline being worked through. It was noted that there were some roads which were not Haringey Council roads and were TFL roads. Also there were some which were Haringey roads but still needed TFL permission as changes would affect traffic flows and bus lanes. Striving for stakeholders and authority stakeholders support and co-operation for this action.

- Clarification was sought on the rollout of levelled kerbs and footways, particularly tactile paving, and making crossings safer for vulnerable users. This was addressed in two other reports, the Walking and Cycling Action Plan and Highways and Investment Plan. The latter decision had been considered at a Cabinet signing and questions on these issues could be emailed to the Cabinet Member.

RESOLVED

1. To approve the Road Danger Reduction Action Plan, as set out in Appendix 1;

2. To approve the Investment Plan for 2022/23 set out in Appendix 2;

3. To delegate decisions relating to scheme design and implementation to the Head of Highways and Parking;

4. To authorise the Head of Highways and Parking to carry out any required consultation in accordance with Appendix 3 and to make any necessary traffic orders, having had due regard to any prior consultation, to give effect to those schemes; and

5. To authorise the Head of Highways and Parking to consider any objections and representations on road danger reduction schemes and to report back to the Cabinet Member for Customer Service, Welfare and the Public Realm if there are significant or substantial objections or concerns raised.

Reasons for Decision

The Council has a statutory duty under section 39 of the 1988 Road Traffic Act to "take steps both to reduce and prevent accidents". It must also prepare and carry out a programme of measures designed to promote road safety.

This report recommends the investment for 2022/23 as well as a set of wider actions that will assist in prioritisation in future years.

Alternative options considered

The authority has a statutory duty as set out in paragraph 0.

756. PARKING INVESTMENT PLAN

The Cabinet Member for Customer Service, Welfare and the Public Realm introduced the report which sought approval for the Council's parking schemes and programmes to be delivered across the borough in the next financial year (2022/23).

The Cabinet Member highlighted the following in her introduction:

- Tackling pavement parking and working with disability groups on this.
- Issued 1000 free virtual permits for blue badge holders.
- No charge for badges that were stolen.
- Visitor permits for Adult social care providers being considered to support vulnerable residents with care needs.
- Ensuring dedicated bays the correct size.
- Car free developments – process of considering with Planning which allows the developments to not impact on parking in surrounding areas.

In response to questions from Cllr Cawley- Harrison, the following was noted:

- As previously referred to, the income from CPZ's was ringfenced and supported funding the cost of Freedom Passes. The Council was close to reaching financial breaking point but if more CPZ's were added. The scale of increased resources would also be contingent on the additions and changes time requirements for CPZ's .
- In response to a query about revisiting CPZ decisions , the policy passed at Cabinet in March 2020 advised that there would be a review of all CPZ's within 5 year period so the Council would not keep returning to the area that had rejected a CPZ.
- Conversations were continuing between Highways Team and Strategic Transport on issues concerning footway parking, over hanging cars and bikes. This fell under ASB enforcement due to different types of laws that required consideration. Cllr Chandwani would advise Cllr Cawley – Harrison of the number of cases that have been dealt with over the last 3 to 4 years.
- In addition there was work to tackle pavement parking and services will look at roaming bikes that are left on pavements and tackling scooters and mopeds being incorrectly parked and not in designated areas.

RESOLVED

1. To agree the Parking Investment Plan for the 2022/23 financial year, as set out in section 6 of the report, subject to the consultations not raising any significant or substantial issues: and

2. With regard to parking investment issues, to give delegated authority to the Head of Highways and Parking:

(i) To make decisions relating to scheme design and implementation;
(ii) To carry out consultations in accordance with Appendix 2 attached to this report and report any significant or substantial objections or concerns raised to the Cabinet Member for Customer Service, Welfare and the Public Realm; and
(iii) To make traffic management orders, having had due regard to any prior consultation, to give effect to those schemes.

3. To agree the waiver of the £10 administration fee for the replacement of stolen Blue Badges from 1 April 2022.

4. To agree to the development of a redesigned parking permit offer for residents being cared for in their homes.

5. To agree to the review of parking permit arrangements for car-free developments to strengthen associated policies.

6. To agree the need to redefine relevant policies to ensure a consistent understanding of disabled parking needs and their application, thereby ensuring that access to specialised transport meets the complex needs of disabled children and their carers.

Reasons for decisions

Parking policies play a major role in shaping neighbourhoods and how our public realm is used. The Council's Transport Strategy clearly identifies its vision for less reliance on the private car, especially for short journeys which can easily be undertaken (by most people) by walking, cycling and public transport.

Proposals in this report will:
- Ensure that residents with additional and complex needs have barriers (caused by current policies) removed.
- Co-produce parking control solutions with residents to reduce commuter parking, excessive visitor parking or parking pressures potentially caused by new developments in their neighbourhoods.
- Support innovation in the use of various traffic restraint measures for example Red Routes, to improve road safety.
- Ensure pedestrians and wheelchair users have priority use of our footways by removal of parking which encroaches on their right of way.
- Use our powers to protect Blue Badge holders from theft and fraud.

Alternative options considered

The proposed programme prioritises new CPZs having considered residents' views. The review of existing CPZs is in line with the Controlled Parking Policy agreed by Cabinet in March 2020 and will address concerns raised by residents. This will also support the Council's modal shift aspirations.

The programme will also be consolidated to take account of schemes delayed further due to the ongoing Covid-19 pandemic. Where possible, those schemes will now be progressed in the coming year, details of which are provided in Appendix 1.

Other programmes (such as review of footway parking, provision of electric vehicle charging points and car club bays) will also help contribute towards supporting modal shift and use of less polluting vehicles. These measures will help increase walking and cycling, thereby reducing air pollution and help towards addressing the climate emergency.

RESOLVED

1. To agree the Parking Investment Plan for the 2022/23 financial year, as set out in section 6 of the report, subject to the consultations not raising any significant or substantial issues: and

2. With regard to parking investment issues, to give delegated authority to the Head of Highways and Parking:

(i) To make decisions relating to scheme design and implementation;
(ii) To carry out consultations in accordance with Appendix 2 attached to this report and report any significant or substantial objections or concerns raised to the Cabinet Member for Customer Service, Welfare and the Public Realm; and
(iii) To make traffic management orders, having had due regard to any prior consultation, to give effect to those schemes.

3. To agree the waiver of the £10 administration fee for the replacement of stolen Blue Badges from 1 April 2022.

4. To agree to the development of a redesigned parking permit offer for residents being cared for in their homes.

5. To agree to the review of parking permit arrangements for car-free developments to strengthen associated policies.

6. To agree the need to redefine relevant policies to ensure a consistent understanding of disabled parking needs and their application, thereby ensuring that access to specialised transport meets the complex needs of disabled children and their carers.

Reasons for decisions

Parking policies play a major role in shaping neighbourhoods and how our public realm is used. The Council's Transport Strategy clearly identifies its vision for less reliance on the private car, especially for short journeys which can easily be undertaken (by most people) by walking, cycling and public transport.

Proposals in this report will:

- Ensure that residents with additional and complex needs have barriers (caused by current policies) removed.
- Co-produce parking control solutions with residents to reduce commuter parking, excessive visitor parking or parking pressures potentially caused by new developments in their neighbourhoods.
- Support innovation in the use of various traffic restraint measures for example Red Routes, to improve road safety.
- Ensure pedestrians and wheelchair users have priority use of our footways by removal of parking which encroaches on their right of way.
- Use our powers to protect Blue Badge holders from theft and fraud.

Alternative options considered

The proposed programme prioritises new CPZs having considered residents' views. The review of existing CPZs is in line with the Controlled Parking Policy agreed by Cabinet in March 2020 and will address concerns raised by residents. This will also support the Council's modal shift aspirations.

The programme will also be consolidated to take account of schemes delayed further due to the ongoing Covid-19 pandemic. Where possible, those schemes will now be progressed in the coming year, details of which are provided in Appendix 1.

Other programmes (such as review of footway parking, provision of electric vehicle charging points and car club bays) will also help contribute towards supporting modal shift and use of less polluting vehicles. These measures will help increase walking and cycling, thereby reducing air pollution and help towards addressing the climate emergency.

757. OUTCOME OF PUBLIC CONSULTATION FOR WOOD GREEN CONTROLLED PARKING ZONE REVIEW

The Cabinet Member for Customer Service, Welfare and the Public Realm introduced the report which set out the results of public consultation undertaken between 19 July 2021 and 9 August 2021, on new controlled parking arrangements for the Wood Green area, replacing the existing (Wood Green) Inner and Outer Controlled Parking Zones (CPZs).

This CPZ covered 5 wards and was reviewed with many different proposed ways to divide the CPZ into different zones. However, it was clear from the consultation that people wanted to keep CPZ as it was and they did not like the demarcations proposed. Therefore, the report took forward resident's views and made no changes to the Wood Green Inner and Outer CPZ.

In response to questions from Cllr Cawley- Harrison, the following was noted.

- With regards to other CPZ review decisions coming forward and the learning from this review on how to illicit responses that would need to reach the required threshold needed to make changes, it was noted that this was a unique CPZ which covered large part of the borough. There were always lessons to be learned. An example of current learning was to review current language / communications to better explain that Council were not instructing on CPZ's but asking and involving residents in the co-production of the CPZ, if they were to have it.

RESOLVED

1. To note the results of the public consultation undertaken of the review of the Wood Green Control Parking Zones (CPZs).

2. To agree that, in line with current CPZ policy, no changes should be made to the existing Wood Green CPZs at this time.

Reasons for decisions

The Council adopted a formal CPZ policy (attached as **Appendix I)** in March 2020. This requires the Council to consider the results of public consultation conducted on the review of CPZs, prior to making a decision whether or not to proceed to implementation. This policy sets a minimum threshold for response rates to consultation, as well as requiring at least 51% support for proposals from those who do respond.

The analysis of the results of the public consultation undertaken indicates a 5% response rate which is below the 10% threshold required. In addition, there was very little support for proposals from those who did respond. While the current Wood Green CPZ conflicts with transport policies as well as the design principles set out in the CPZ policy, priority is given to community views. While the response rate is too low to determine any outcomes, the views expressed suggest that existing arrangements work for residents. As a consequence, no changes are recommended.

Alternative options considered

Consideration was given to formally splitting the Wood Green Inner and Outer CPZ, limiting the use of parking permits to their respective CPZs. While the response to the consultation was low, it is clear that the majority of those who did respond have no desire for change.

758. REPORT FROM THE LOCAL GOVERNMENT AND SOCIAL CARE OMBUDSMAN (REFERENCE NUMBER 19 020 651)

The Cabinet Member for Health, Social Care, and Well-Being introduced the report which asked Cabinet to consider the report of the Local Government and Social Care Ombudsman (19 020 651) and confirm the actions that the Council has taken or proposes to take, under the requirements of the Local Government Act 1974, section 31(2) (as amended).

The Cabinet Member described that aids and adaptations can be a complex area but accepted the service had failed to deliver service, as outlined in the report, in a timely manner. Cabinet noted that, as well as putting a plan in place to support this particular family, an action plan had also been put in place for service improvements and work with service users of aids and adaptations, including improving the communications with service users on timings and expectations for completion of aid and adaptations.

In response to questions from Cllr Bevan, Cllr Brabazon, Cllr Cawley- Harrison the following was noted:

- With regards to having confidence in the improvement plan, the service were redoubling efforts to meet targets and the Cabinet Member and Director were monitoring this on a weekly basis.
- The Cabinet Member expressed that providing aids and adaptations was a complex and challenging area and noted delays that would have resulted from the pandemic. However, it was accepted that the service was not proactive with communications with residents when there were delays. The improvement plan sought to rectify this with expert advice in this area and would seek views from people in receipt of service. There were workforce capacity issues when considering the specific access needed to occupational therapists and surveyors. The Council were examining re- grading in house surveyors in order to attract further specific skilled staff to this area. The staff were also considering performance management of staff and recognised the need for a sharp focus on responding to resident needs .
- System of client needs and increased tracking and monitoring to be completed.
- Working through to improve the links between Children's and Adult services on aids and adaptations and compiled a list of cases focused on children and families. Paediatric occupational therapy now participating in these assessments . Also children of families would become involved in the decision making to help keep the focus on the family's needs as well as consideration of technical assessments.

- The LGO report was published on the 9th of December and any information shared with the LGO was shared with the Cabinet Member.

- The Director for Adults and Health was not aware of any other Local Government Ombudsman reports to be published on Haringey complaints, concerning aids and adaptations.

RESOLVED

1. To accept the findings and recommendations of the Local Government and Social Care Ombudsman (LGSCO) in the report shown at Appendix 1.

2. To endorse the actions taken by the Council as set out in paragraphs 6.11 to 6.14 of the report.

3. To adopt the report as the Council's formal response under s.31 Local Government Act 1974, to be communicated to the Ombudsman.

4. To adopt the report as the Cabinet's formal response as required by s5A Local Government and Housing Act, 1989, for distribution to all members and the Monitoring Officer.

Reasons for Decision

The LGSCO report published on 9 December 2021 issued a finding of: Upheld; maladministration and injustice. That Mr X suffered injustice because of fault, under Section 31(2) of the Local Government Act 1974.

The LSGCO identified several areas of fault:

- Periods of delay between Oct 2016 and Feb 2019. (Not withstanding that the family delayed responding to the Council by 1 year when the request was first made in 2015)
- Failure to evidence that meaningful support was offered to the family or that they were meticulously kept informed of the status of their application
- Further delay between Feb 2019 and Sept 2019
- Failure to install two changing benches in Feb 2019 and poor record keeping about this
- Failure to evidence proper consideration was given to the family's request for alternative adaptations.

The LGSCO has recommended the following action be taken:

- The Council must consider the report and confirm within three months the action it has taken or proposes to take. The Council should consider the report at its full Council, Cabinet or other appropriately delegated committee of elected members and we will require evidence of this. (Local Government Act 1974, section 31(2), as amended) 87.

In addition to this requirement, the Council should take the following action:

- Apologise in writing to Mr and Mrs X.
- Pay Mr and Mrs X £2,000. This is a symbolic payment to acknowledge the significant delay in this case. Mr and Mrs X intend to use it to fund a family holiday for the benefit of Child Y. In deciding on this amount, we considered our Guidance on Remedies.
- Contact Mr and Mrs X to agree what works remain outstanding. The Council should confirm what has been agreed in writing. These agreed works should be completed within four weeks from the date COVID-19 restrictions have been lifted to the extent that Mr X is comfortable with contractors coming into the family home. The Council has confirmed discussions are taking place with Mr and Mrs X to agree a suitable way forward; and
- Reflect on the issues raised in this decision statement. The appropriate Service Director should carry out a review and identify any areas of service improvement. The Council should prepare a short report setting out what it intends to do to ensure similar problems do not reoccur, particularly around delay and strip washing.

It should be noted that the Council has already reported back to the Ombudsman in response to a draft version of this report.

Alternative Options Considered

The LGSCO cannot mandate the Council to follow its recommendations, but local authorities do follow them.

If the LGSCO is not satisfied with the Council's response, they will make a further report explaining this and making recommendations. The LGSCO can also require the Council to make a public statement about the matter.

Therefore, Cabinet could choose on rational grounds to reject any of the recommendations made by the Ombudsman.

However, this alternative is not recommended because the LGSCO recommendations represent an appropriate remedy for the reasons set out above.

759. REPORT FROM THE LOCAL GOVERNMENT AND SOCIAL CARE OMBUDSMAN (REFERENCE NUMBER 20 006 289) NON KEY

The Leader of the Council introduced the Council's response to the Local Government and Social Care Ombudsman issued a report on 10 January 2022 in response to a complaint from a resident of the borough (Mr X) with regarded to the Council's decision not to acquire his home, the manner in which this decision was made and the communication from the Council to Mr X.

The Ombudsman made recommendations to the Council with regard to the appropriate next steps and these were being taken forward.

The Leader of the Council apologised to Mr X for the stress and uncertainty caused him. The Council was committed to implementing the Ombudsman's recommendations in full and had already issued a formal letter of apology to Mr X and paid him £1,000. The next report on the agenda would reconsider all possible options for the development site at Cranwood and Woodside Avenue.

The Leader wanted to ensure that nothing like this ever happened again and had asked the new Chief Executive to review arrangements for how property decisions were taken in the future and acquisitions are made to make sure that the decision-making process is robust, transparent and accountable. The Leader of the Council had also convened an independent external investigation into historical arrangements for property transactions.

Following questions from Cllr Cawley- Harrison, Cllr Ejiofor, the following was noted.

- With regards to the LGO report noting non response and non-co-operation, this related to a specific incident where one email from Mr X, sent in April 2018, which was not responded to and officers accepted that this was not right and

emails should be responded to. Officers present in the meeting were not employees of the Council and service at this time, and could only speculate that the plans for the site in April 2018 were in flux due to the pause in the creation of the HDV and before an election period in which there was likely to be a change in direction. This may have guided this non response to the email.

- In response to a question on specific flaws and responsibility for this, the LGO report referred to March 2020 decision making as a 'flawed' and this had been accepted as the Council and LGO report derived that injustice had occurred and Council apologised and paid compensation. Also section 4.2 of the report clearly set out the flaws in the decision making and reasons for this.
- Responding to the information at Paragraph 37 that the outcome of the decision making would not have been any different, it was noted that the LGO report sought reconsideration of the decision and this would be taken forward in the next item.

RESOLVED

1. To note the findings and recommendations of the Ombudsman in the report shown at Appendix 1.

2. To note the implementation of the Ombudsman's recommendations as set out in paragraphs 6.2 and 6.3.

3. To adopt the report as the Council's formal response under s.31 Local Government Act 1974, to be communicated to the Ombudsman.

Reasons for decision

As set out in the Ombudsman's report, Mr X has been found to have suffered injustice as a result of faults on behalf of the Council.

Where a report such as this is made by the Ombudsman, it must be laid before the authority (s.31 Local Government Act 1974). In cases such as this where the Council is operating executive arrangements, "the authority" means the executive, i.e. Cabinet (s.25(4ZA) Local Government Act 1974).

Alternative options considered

The Council could choose not to implement any of the recommendations made by the Ombudsman.

760. RECONSIDERATION OF THE PROPOSALS FOR THE DEVELOPMENT OF THE SITE OF THE FORMER CARE HOME AT 100 WOODSIDE AVENUE AND THE TERRACES AT 102 TO 108 AND 110 TO 116 WOODSIDE AVENUE.

The Cabinet Member for introduced the report which took forward one of the recommendations from LGO report considered at item 759 and resolution 2 above

which was for the Council to reconsider the proposals for the development of the site of the former care home at 100 Woodside Avenue and the terraces at 102 to 108 and 110 to 116 Woodside Avenue.

It was noted that prior to the issue of this report, the Council commenced a procurement exercise for a contractor to build out the scheme if planning was successful. This procurement has been put on hold while the reconsideration has been taking place. The Cabinet Member wanted residents to be assured that the Council had considered, in detail, every alternative option for this site as outlined in the report. The Cabinet Member welcomed the opportunity of going through the options for this site from first principles with detailed financial analysis.

The Cabinet Member advised that the weight of evidence in favour of the preferred option made it clear that this was the only option , the Council should be taking forward. The preferred option set out performed better financially than all the other options, delivered homes more quickly and minimised disruption to residents.

In response to questions from Cllr das Neves, Cllr Dogan, Cllr Diakides, Cllr Chandwani, Cllr Davies, Cllr Brabazon, Cllr Cawley- Harrison and Cllr Ejiofor, the following information was noted.

- Issues with having the previously estimated higher number of homes on the site, identified in the detailed design works were: overshadowing, potential splitting of the site as a mains water way underneath, problems with providing access to amenities , plants, car parking , refuse bay area.
- Also if the terraced homes were demolished, and taking into account the above, there was only potential to add in three storey buildings, meaning a net additional 6 homes.
- There had been a calculation of values of the development set out over a 50-year period. It was explained that whilst comparing all different options, it had been assumed that £2.15m paid for the previous home purchased was assumed as neutral in all options and that there would the loss of income for the Council from the 7 existing terraces would be factored in for options 2 and 3. These options had been evaluated on the basis on net present values. Private sale values had been established using an independent valuer.
- Responding to the questions about assurance on the process for housing schemes going forward, and not repeating issues of this particular scheme, the Cabinet Member explained that the Council took the LGO report seriously and supported by the Leader, as previously set out, there would be an external investigation into the historic decision making process of the Cranwood development .
- In relation to ensuring that all Council housing schemes were considered in diligent manner, there had been an improvement in the last couple of years in the decision making and review process. There was now an established Housing Development team with a robust process in place. Cabinet noted that a number of housing schemes had now come forwardthrough an established gateway procedure with checks and balances at each stage. This would be as follows:
- **Gateway zero - Cabinet decision to work out the feasibility of the site and no money spent until Cabinet approval.**

- **Gateway 1 Council's Housing Delivery Board – officer board agrees budgets from feasibility through to planning.**
- **Gateway 2 – planning decision and this can be a Planning Sub Committee decision or officer delegated decision depending on size and nature of the scheme.**
- **Gateway 3 – contract award decision before embarking works on site**
- **[Therefore this scheme would come back to Planning and back to Cabinet on the as set out above.**
- **Gateway 4 would include practical completion and Gateway 5 referred to the settling of the defect period.**
- Considering that the LGO report was only issued 2 months ago, assurance was provided that there was significant work completed on the detail of the attached report and the options and proposal that it contained. It was important to provide a timely response to the LGO recommendations and to provide assurance to tenants and interested parties about the future of the site. The Cabinet Member and officers were confident that they had reviewed the options thoroughly. Given the amount of design work that had taken place on the scheme there had been a range of previous design options available to consider. These had been assessed through a process of elimination, resulting in the attached options presented to Cabinet. These were the most financially viable options that reflected the aspirations of development programme.
- Tenants were assured that the recommendations put forward meant that there was no longer threat of developing the two terraces and their homes being knocked down.
- It was clarified that paragraph 3.1b – referred to the former Cranwood site care home and 2 blocks of terraces and the 7 homes owned by the Council were 7 individual houses on the block of terraces which made a total of 8 homes.
- In relation to the recommendations proposed further disadvantaging Mr X, there was no obligation on the Council to buy people's properties when there was not a need to buy those properties. The report showed that the purchase of 104 Woodside Avenue would not allow more housing on the site or more funds to be added to the HRA to provide more homes elsewhere. There was no recommendation from the LGO report suggesting purchasing Mr X's property in the absence of developing the two terraces.
- There were lessons learned on negotiating with homeowners and leaseholders, including having discussions recorded and documented.
- The Leader asked officers to ensure there was communication with the tenants and relevant parties setting out the outcome of this decision and that this should go out as soon as possible after the meeting.
- Regarding the level of detail in the report to enable an informed decision, it was noted that the report included the usual level of detail provided for development schemes. The report had been assessed and commented on by Finance team and was an accurate reflection of financial considerations
- In relation to 106 Woodside Avenue being passed to the Community Benefit Society and how decisions were made on this entity including the home rather than Council tenants, noted that there was a programme of homes for the HCBS. It was the existing practice for acquiring properties to lease them Community Benefit Society. This was also set out in the Medium-Term Financial Plan as the Council's recognised approach.

- The Cabinet Member agreed that the process of decision before Cabinet was robust enough and the decision was the right one to approve.
- Regarding the level of compensation payments for the inconveniencing of Mr X, this was not a matter for Cabinet to comment on but a matter for the Local Government Ombudsman who compiled the recommendation.

RESOLVED

a) Not to acquire 104 Woodside Avenue
b) Not to consider the potential decanting of the tenanted homes belonging to the Council at 102 and 106 to 116 Woodside Avenue
c) To proceed with the development of the proposal for 100 Woodside Avenue as outlined in the planning application HGY/2021/2727 as set out in paragraph 4.2 of this report*[this was incorrectly referred to as paragraph 3.2 in the published report but the planning application is clearly set out at paragraph 4.2]*
d) That a further report will be brought to Cabinet for final decision regarding this development in due course.

Reasons for decision

Since the decision not to include the terraces on Woodside Avenue in March 2020 in the redevelopment of 100 Woodside Avenue site, the Council has developed plans for a scheme of 41 new homes (32 social rented and 9 outright sale) on the site of the former care home only. This is the scheme set out in planning application HGY/2021/2727. This will also mean the retention of the neighbouring terrace of existing Council homes (see para 3.2 below shaded in light grey – 7 Council/HCBS homes, excluding one private freehold home at 104 Woodside Avenue). This would result, including the existing tenanted homes in the calculation, in a total of 39 Council-owned homes on the whole site.

The designs of the proposed site (as per HGY/2021/2727) if preferred option were to be developed out can be seen below:

This iteration of the scheme has been tested and is the most financially advantageous of the proposed options.

Progressing with these plans for the site and continuing the process of seeking planning approval for this version of the scheme is the preferred option. It is the most financially advantageous scheme and is at an advanced stage of design development. This scenario would therefore most strongly support continued achievement of Priority 1 of the Borough Plan – a vision of a 'safe, stable and affordable home for everyone, whatever their circumstances'.

The preferred option would mean that the Council does not have to demolish residents' homes at 102, 106-108, and 110-116 Woodside Avenue. It would also mean the Council had no reason to acquire the freehold property at 104 Woodside Avenue.

For the purposes of appraising the options, the assumption that has been followed is that the cost of the acquisition of 106 Woodside Avenue is not included in the comparative appraisal as it has already been incurred.

Given that 106 Woodside Avenue does not now form part of the preferred option, it would continue to be leased to the Haringey Community Benefit Society (HCBS). The price paid for the property reflected the assessed land assembly value at that time. Subsequent to that, detailed design work on the site has made it clear that the development value of including the terraces on the scheme is lower than previously thought. In the period since, the Council has changed its valuation methodology for acquisitions of this nature.

Alternative options considered

Alternative Option 1

Not to develop the site for housing. The site has a site allocation in Haringey Council's Development Planning Document, and any alternative use is not likely to gain planning approval. This would mean that the site would continue to be underutilised and not deliver much needed housing in the borough.

Alternative Option 2

An option has been considered and tested for acquisition of the remaining freehold house (104 Woodside Avenue), decanting of the existing 7 Council/HCBS homes in the terrace, and the re-development of the whole site. Architects indicate this redevelopment would deliver 55 new homes across the whole site.

Below are some indicative plans for the re-development of the whole site, producing 55 homes in total:

Testing of this option by our Architects has indicated that it is likely to be undeliverable because of the additional requirements for access roads, parking, refuse storage and amenity space, which do not apply if the existing homes are retained.

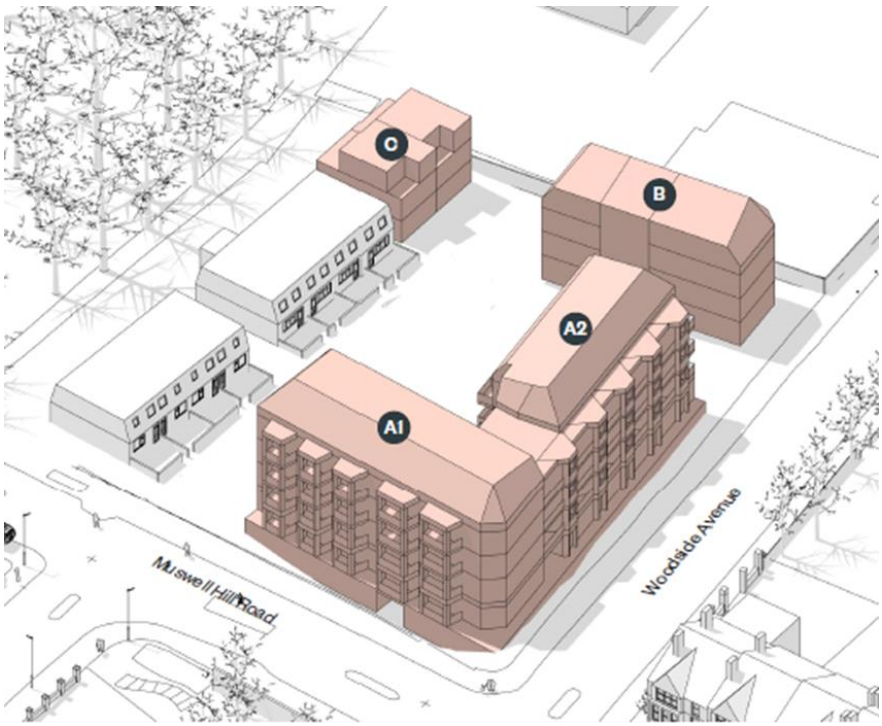
This option has also been tested financially. In this option, as well as option 3, we have assumed that it would cost us £1.75m to purchase Mr X's property as this is the most recent offer that he has made us. In our financial modelling, officers began by seeing if the scheme could work financially if 40 of the 55 homes were to be delivered for social rent (i.e., 1 more net Council home than the preferred option). Officers then tested other potential mixes of Council and private housing. Ultimately Officers found that this option is less financially advantageous than the preferred option even if only 32 homes in block A are delivered for social rent and all the remaining 23 new homes are sold. This would continue to be the case even if Mr X was prepared to sell his property to the Council for £850,000. This alternative option would also have a net loss of 7 Council homes compared to the preferred scenario.

This option would further require a new consultation process based on a ‘meaningful’ design under s105 of the Housing Act 1985 due to the loss of existing homes and the permanent decanting of existing tenants. If one was to assume the completion of that consultation and a consequential favourable decision that involved the demolition of the existing properties, there would then be a need to assess the existing tenants’ needs and, once identified, decanting them into suitable alternate homes. Officers’ experience indicates this process could take more than a year to achieve.

For these reasons, Cabinet is recommended not to consider proceeding further with Alternative Option 2.

Alternative Option 3

The Council has considered a third option as a ‘mid-point’ between the preferred option, and alternative option 2. The following image helps demonstrate the option in question:



In option 3, planning application HGY/2021/2727 would be progressed and approval would be sought. Blocks A1 and A2, which are planned to contain 32 social rented homes, would then be put out to tender for a main build contractor and their development progressed. In the meantime, Blocks B and C, and the existing terrace would be redesigned to facilitate a future re-development. Whilst the re-design was happening, the residents of the terrace would be consulted with and depending on the outcome of that consultation and further decision-making, new homes would be found for them. This option would also necessitate the freehold of 104 Woodside Avenue being acquired. The re-designed Blocks B, C and terrace would then be progressed as a new planning application and brought forward accordingly.

The Council's Architects have indicated that this phased iteration of the scheme would run into many of the same issues as those set out in option 2 because of the additional amenity requirements caused by any increased density.

Officers have also tested the financial viability of this option, which performs even more poorly than option 2, even if all homes other than those in Blocks A1 and A2 were built for market sale. This is due to an increase in interest and a later receipt of cross subsidy. Moreover, like option 2, this scenario would see a net loss of seven Council rented properties from the site.

For these reasons, Cabinet is recommended not to consider proceeding with Alternative Option 3.

761. ADOPTION OF WALKING AND CYCLING ACTION PLAN

The Cabinet Member for Environment, Transport and the Climate Emergency and Deputy Leader of the Council commended the Transport and Highways teams for bringing together their expertise and joint ambition to respond to a vision for active travel in the borough. The attached report documented the responses to a consultation on the Draft Haringey Walking and Cycling Action Plan (WCAP/Plan) (8 November 2021 – 10 January 2022) and the Council's response to these, and recommended Cabinet adopted the WCAP as amended in response to the consultation responses.

The Cabinet Member referred to the Draft Haringey Walking and Cycling Action Plan (WCAP/Plan) as being an appendix to the Haringey's Transport Strategy (2018) which sets the transport objectives for the borough over the next 10 years and outlines clear priorities to reduce the reliance on the private car, increase walking and cycling and enhance the public transport network.

It was noted that at the heart of this strategy, there was the need to tackle air quality, improve quality of life and wellbeing and working towards a carbon zero borough. Enabling more trips to be made by walking and cycling in Haringey remained the overarching objective of the Strategy.

The Cabinet Member highlighted the changes made to the Draft Haringey Walking and Cycling Action Plan as a result of the consultation response, links to other strategy in health and adult's services and connections between local destinations .

In response to questions from Cllr Bevan , Cllr Chandwani, Brabazon, Cllr Davies, das Neves, and Cllr Cawley- Harrison, the following was noted.

- The latest TFL funding settlement of three years meant that they were funding active travel with LIP funding back to recent historic levels.
- Cycle hangers were a core part to the solution for active travel and the Council had allocated £200k of Council money, annually and for three years for cycle storage. This would still allow TFL funding to be added to this allocation for bike hangers.

- The Plan was neutral on funding sources and could allow a range of funding sources to be applied for.
- Noted that having a strategy and action plan to refer to in funding bids supported access to the wider grants and funding bids .
- There was £475k investment in parks, over two years and green spaces. This included lighting improvements, updating lighting columns, changing to LED lighting and adding lights to central system so that when lights were faulty the Council could detect and can locate the lighting column quickly to respond to safety concerns. This related to wider parks action plan and further reflected that the plan had been compiled in the context of other schemes and strategies which included safety of women and girl sand having safer routes to walk.
- The plan addressed accessibility and accommodating families access green spaces.
- Imperative Haringey was the most accessible borough in London and need do pioneering work on this. Addressing this through transport planning in highways and setting up stakeholder groups including disability groups .
- Boundary review of Finsbury Park - accessibility and reach and people that are affected feed into the process.
- With regards to delivering cycle training , it was imperative to prioritise active healthy travel , improving cycle infrastructure is key and looking at how to redesign the service using a co-production model and embed cycle training in the long term, need young people with confidence and skills learning how to ride bike
- Maintaining ecology and balance protection of biodiversity and ensuring parks were safe for all people at all times was essential. Council investing in a LED system and connection to central system which will enable the Council to dim lights and turn them on and off in required areas.
- Communicating better that a vision and some inventions meant that there was now an updated map will include information that indicative plans for LTNs.
- Responding to the query that some works that have fallen in between Highways and Strategic Planning service and that some works may also have benefitted from place making views , these services had worked together on Schools' Streets and LTN's and working together closely would continue with the Walking and Cycling Action Plan.
- Outlined in the plan were cycle routes which would connect borough boundaries to borough boundaries as active travel corridors for commuting. The Plan highlighted that active travel is for all uses, regardless for leisure or work.
- Accepted that there can be changes and nuances added. However, also a wider document which will be applicable and referenced by key Council services such as Adults and Health.

RESOLVED

1. To note the responses received in response to the consultation on the Draft Walking and Cycling Action Plan (WCAP), the Council's responses to these set out in Appendix C, and the consequent changes made to the Draft Walking and Cycling Action Plan;

2. To adopt the Walking and Cycling Action Plan as set out at Appendix D;

3. To delegate to the Assistant Director for Planning, Building Standards and Sustainability to make changes to the formatting of the Walking and Cycling Action Plan and the maps within it before publication.

Reasons for decision

The WCAP is needed to deliver the Council's adopted Transport Strategy and to enable more trips in Haringey to be made by walking and cycling. The WCAP ensures clarity around the Council's active travel priorities for managing our transport network and to support the delivery of the Borough Plan objectives for growth and regeneration, as well as improving health and environmental quality. The WCAP will also help support the emerging New Local Plan to help shape new developments.

Alternative options considered

The alternative options considered are:

Option 1 – Not to adopt the WCAP. The disadvantages of this are that the Council would not meet its commitment in the Haringey Transport Strategy to produce a WCAP, it would not have a specific adopted guidance plan to enable increased walking and cycling in the borough, and there would not be an agreed strategic approach to walking and cycling which sets priorities, supports coordinated decision making and will help the Council target resources effectively having regard to Transport for London's (TfL's) currently very limited funds as a consequence of Covid-19.

Option 2 - To adopt the WCAP without any changes to the Draft WCAP following public consultation. This option would be contrary to the requirement for the Council to take into account all consultation responses received before adopting the WCAP. This would mean not taking account of important feedback from the community and the stakeholders and would not allow changes to be made to the Draft WCAP which would improve the robustness of the Plan as a whole.

762. HOUSING STRATEGY CONSULTATION

The Cabinet Member for House Building, Place-Making, and Development introduced the report which asked Cabinet to approve a draft new Housing Strategy for Haringey and to agree to commence a consultation on this new Housing Strategy.

It was explained that the existing Housing Strategy was for 2017-2022 and that a new strategy needed to be developed. The proposed Housing Strategy would be for 2022-2027 and set out four key aspects: delivering new homes, improving the quality of homes and services for the social hosing sector, improving conditions in the private rented sector, and preventing and alleviating homelessness. It was added that the strategy also acknowledged the importance of responding to the climate emergency and of ensuring that the Council worked holistically across services.

The Cabinet Member responded to questions from the Cabinet:

- It was acknowledged that there was a need for consistency and joint working across Council services. In relation to a query about Houses in Multiple Occupation (HMOs), it was noted that officers were working to align licensing and planning policies to ensure clarity for all parties.

The Cabinet Member responded to questions from Councillor Cawley-Harrison:

- It was stated that most new build scheme council homes would have air source heat pumps which would be connected to the District Energy Network (DEN) and this would make it cheaper to heat homes. It was noted that some homes may need to use gas boilers as a temporary solution before new units were connected to the DEN. It was added that new council homes would be targeting high standards of sustainability which were being achieved on a number of schemes.
- In relation to queries about the accessibility of council homes, it was explained that the Council Housing Delivery Programme was delivering wheelchair accessible and adaptable homes. It was also highlighted that the Council was taking an innovative approach to designing bespoke homes which would be made specifically for residents who could not be housed in existing provision. It was noted that the Council had identified approximately 200 households who would benefit from the bespoke housing programme.
- It was noted that the Council had missed housing delivery targets over the last few years and it was enquired how delivery would be increased. It was explained that the Council's performance in delivering housing, as required by the Housing Delivery Test, had been improving. It was noted that, since January 2022, the Council no longer faced the presumption in favour of sustainable development penalty. It was stated that, although housing delivery was not always in the Council's direct control, the housebuilding programme would assist with meeting delivery targets. It was added that the Council had published a Housing Delivery Test Action Plan for the last few years which set out a plan to bring forward housing delivery as much as possible.

RESOLVED

1. To note the Draft Housing Strategy attached at Appendix 1.

2. To agree to hold a public consultation, alongside other forms of participation and engagement, later in 2022.

3. To delegate to the Director of Housing, Regeneration and Planning, after consultation with the Cabinet Member for Housing, Placemaking and Development, approval of final consultation documentation.

Reasons for decision

Haringey's current Housing Strategy runs from 2017-2022. A new Housing Strategy therefore needs to be developed.

As a key policy document for the Council and Borough, the Housing Strategy is subject to statutory consultation. In addition to this statutory requirement, the Council is committed to enabling residents to actively participate in service design and

strategy development. Following engagement and consultation, a final Housing Strategy will be developed and presented to Cabinet for approval.

The Housing Strategy forms part of the Council's Policy Framework. As such, the final Housing Strategy will be presented to Full Council for approval.

Alternative options considered

Not to develop a new Housing Strategy. This was rejected because, even though a Housing Strategy is not a statutory document, it is an important part of the Council's policy framework and sets the direction of travel for housing.

763. LONDON BOROUGH OF HARINGEY PROPOSED SELECTIVE PROPERTY LICENSING SCHEME

The Cabinet Member for Planning , Licensing and Housing introduced the report which sought a decision from Cabinet to consider whether to authorise the designation of an area as subject to selective licensing when considering the consultation outcomes, evidence, and prescribed criteria within Part 3 of the Housing Act 2004. This was following the findings of the statutory consultation on selective licensing which ran from 17th May 2021 to 5th September 2021.

The Cabinet noted that more than a third of Haringey's residents rented their home from a private landlord. The number of privately rented homes was increasing and the Council wanted to ensure all privately rented homes were decent and safe. The private rented sector provided a much needed and valuable source of accommodation for the wide range of individuals, and increasingly families, that require this type of accommodation.

Noted that the new selective licensing scheme fell within all 12 wards to the east of the borough. This scheme would make it mandatory for any landlord renting a property to a single-family household or two unrelated sharers to licence this property with the Council. This proposed scheme will complement the existing property licensing scheme that we have in place for property rented as Houses in Multiple Occupation, which has been in operation since May 2019.

Following decision at Cabinet this will be considered by the Government Ministry responsible for local government.

Questions from Cllr Davies, Cllr Brabazon, Cllr Chandwani, Cllr das Neves, and Councillor Cawley- Harrison, were put forward and the following noted.

- Previous ward boundaries were included, as the consultation had been based on this and the government department agreed to this. There was a look up system available to allow tenants and landlords to add in address and find out if a license is needed or property already licensed.
- Acceptance of the scheme was aimed for. There had been 2 wards taken out as their inclusion would have caused a risk of refusal of the whole scheme. It was noted that the specialists' advisors , supporting the review of the scheme, had worked with Enfield and Waltham Forest and had a wealth of experience.

There had been arm's length meetings with the ministry and steer provided. Feedback given that strong submission and also having a draft housing strategy with a section on private sector housing was positive.

- Noted that the extra revenue produced will provide for additional officers in the selective licensing team to be recruited. Satisfied extra revenue will enable the enforcement activities to be taken forward.
- With regards to preparing for the scheme, once it was agreed and starts, the plan was to move staff from the HMO Licensing team to the selective Licensing team and also take forward a new recruitment programme to ensure good staffing levels to deliver the selective licensing scheme, should approval be given by ministry .
- Principle of having an agile workforce being taken forward to ensure meet the needs of the project as it progresses and adapt staffing levels accordingly. Considering a separate distinct HR strategy to ensure good recruitment strategy, including apprenticeships to fill posts.
- The submission of other successful borough's selective licensing schemes was not shared by government and service working with other local authorities and understood what has worked well or not well.
- With regards to the removal of the Stroud Green and Hornsey wards from the scheme, this was taken forward after further considering criteria on deprivation, property improvement, and tackling ASB. On reflection the evidence base for the tackling ASB was not felt strong enough to allow acceptance. Also deprivation levels considered for these wards and they did not meet criteria on indices of deprivation. Harringay and Bounds Green wards met the requirements for indices of deprivation, property improvement and ASB.

RESOLVED

1. To consider the evidence of poor property conditions and deprivation within the private rented sector properties as detailed in Appendix 1.

2. To consider the outcome of the consultation and the Council's consideration of those finding in Appendices 3 and 4 with particular note to the proposed removal of designation 2 (Hornsey and Stroud Green Wards) as a result of consultation and analysis.

3. To consider the Council's strategic approach linking the proposed selective licensing scheme with the Council's wider strategic approach to the private rented sector as set out in paragraph 7.2 of the report.

4. To approve the designation of 12 wards – (White Hart Lane, Northumberland Park, Bruce Grove, Seven Sisters, Tottenham Hale, Tottenham Green, St Ann's, West Green, Harringay, Noel Park, Bounds Green, Woodside) as delineated in the map at Appendix 2 – as subject to selective licensing pursuant to Part 3 of the Housing Act 2004, subject to confirmation by the Secretary of State for Department of Levelling Up, Housing and Communities. (DLUHC)

5. To approve the proposed licence conditions applying to any selective licence at Appendix 5.

6. To approve the proposed fee structure for licence applications made under the selective licensing scheme at Appendix 6.

7. To authorise the Director for Environment and Neighbourhoods, in consultation with the Cabinet Member for Housing the authority to: -

   (i) Agree the final document requesting confirmation of the selective licensing designation from the Department of Levelling up Housing, Communities (DLUHC) in consultation with the Director.

   (ii) Ensure compliance in all respects with all relevant procedures and formalities applicable to authorisation schemes.

   (iii) Keep the proposed scheme under review during the designation lifetime and agree any minor changes to the proposed implementation and delivery, including administration, fees and conditions and give all necessary statutory notifications.

   (iv) Ensure that all statutory notifications are carried out in the prescribed manner for the designation and to take all necessary steps to provide for the operational delivery of any licensing schemes agreed by Cabinet.

Reasons for decision

There has been significant growth in the Private Rented Sector (PRS) in Haringey over the last 10 years from 23.9% to 40.2 % (Metastreet Ltd ti 2020). This sector offers housing that Haringey values and wants to see as strong, healthy, and vibrant. However, the reality is that many properties within the private rented sector fall short in terms of property condition and its overall management. Our aim is for a better private rented sector that offers security, stability, and decency for its tenants. *(See Appendix 1)*

It is estimated that of 39,564 properties in the private rented sector in Haringey 11,771 (26.9%) (Metastreet ti 2020) are in poor condition. This is double the national average (13%). In addition, 2,714 complaints have been made to the Council's Private Sector Housing Team, by private tenants regarding poor property conditions and inadequate property management over the last 5-year period. *(See Appendix 1)*

Haringey is also a borough with high deprivation levels. Deprivation is lack of income and other resources, which together can be seen as living in poverty. Haringey is recorded in the English indices of deprivation 2020 as the 4th most deprived borough in London, and 49th most deprived in England (of 317). Haringey has the highest homelessness duty owed of any London borough, the highest claimant rate of Universal Credit in London and the highest unemployment rate in London at 9.3% (ONS 2021). (Sept 2021). *(See Appendix 1)*

Haringey has high levels of fuel poverty caused by deprivation, the age and condition of its housing stock. As a direct result of deprivation and poor housing conditions, the

PRS suffers from fuel poverty. A consequence of this is that it can contribute to residential carbon emissions. The Council has a commitment through its Affordable Energy Strategy and Haringey Climate Change Action plan to reduce fuel poverty and to be carbon net zero by 2041. We know the PRS makes up just under half the housing stock in Haringey, and PRS landlords are therefore key players in helping to achieve these goals.

In the proposed designation there are 29,558 total predicted PRS properties (including Houses of Multiple Occupancy (HMOs), of which 4.9% or 1,448 have non-compliant energy performance ratings for the property. As part of the Proposed scheme, we aim to tackle poor energy performance and in turn expect to support those living in fuel poor homes. *(See Appendix1)*

Selective Licensing is a tool that local authorities can seek approval to use alongside their normal enforcement powers to target specific issues that are affecting the local authority and its community, as outlined in paragraphs 4.1 to 4.4. Our proposal will seek to use these powers to tackle poor property conditions and deprivation.

Selective licensing would allow the local authority to regulate landlords to manage this sector more effectively and through the use of licence conditions under S. 80 of the Housing Act 2004 require landlords to take action to improve the quality of the homes they rent and manage those properties more effectively.

Legislation requires that an area may only be designated if it has a high proportion of property in the private rented sector. Guidance from the Secretary of State provides that this is met where the proportion is higher than the national average, which in England is 19% of the total housing stock. The area must also meet <u>one or more</u> of the following 6 statutory grounds; that it is:

- an area of low housing demand (or is likely to become such an area).
- experiencing a significant and persistent problem caused by anti-social behaviour and that some or all of the private landlords letting premises in the area are failing to take appropriate action to combat that problem.
- experiencing poor property conditions in the privately rented sector.
- experiencing or has recently experienced an influx of migration and the migrants occupy a significant number of properties in the privately rented sector.
- suffering high levels of deprivation affecting those in the privately rented sector.
- suffering high levels of crime affecting those in the privately rented sector.

In summary:

- currently Haringey's PRS sits at an estimated at 40% well above the national average for England which is 19%.
- Almost 27% of PRS property in our borough has poor property condition, this is double the national average of 13%.
- Haringey is the 4th most deprived borough in London and the 49th in England.
- Just under 5% of PRS property in Haringey fails to have a legally compliant Energy Performance Certificate contributing to the high levels of fuel poverty seen in our borough.

764. LETTING OF BUILD CONTRACT FOR CHOCOLATE FACTORY PHASE 1

At this point in the meeting, Cllr Diakides left the room.

The Cabinet Member for House Building, Place-Making and Development introduced the report which asked Cabinet to approve the letting of a build contract in relation to the construction of affordable housing at the Chocolate Factory, N22 (Phase 1). The report also requested the appropriation of the land for planning purposes, approval to exercise powers under s203 of the Housing and Planning Act 2016, and appropriation of the land for housing purposes upon Practical Completion.

The Cabinet Member explained that this project was a key milestone in the Council's housebuilding programme and would provide 80 Council rent homes. It was stated that the project would be renovating a derelict site, would provide homes and workspaces, and would also contribute to the regeneration of the area.

The Cabinet Member responded to questions from the Cabinet:

- It was noted that Area 51, a group supporting young people and adults with disabilities, was located at Mallard Place. It was confirmed that there would be ongoing discussions with Area 51 who would be part of the process as the comprehensive scheme was developed. It was noted that solutions were being investigated and it was acknowledged that relocating this group would be long and detailed process.

The Cabinet Member responded to questions from Councillor Cawley-Harrison:

- In response to a question about development in the local area and pressure on services, it was explained that there would be a comprehensive approach for the Wood Green Cultural Quarter and that any required services would be considered holistically.
- In response to a question about when the homes would become habitable, it was noted that the build programme for this project was anticipated to be two years but that it may be possible to deliver slightly earlier.

Following consideration of the exempt information, it was

RESOLVED

1. To approve the appointment of the recommended Contractor (identified in the exempt part of the report – Appendix 3) to undertake the new build works for the scheme known as the Chocolate Factory Phase 1 for a contract sum set out in Appendix 3. Please refer to paragraph 16 of Appendix 3

2. To approve the appropriation of the land at the Chocolate Factory site (edged red in the plans attached at Appendix 2) from general purposes to planning purposes under Section 122 of the Local Government Act 1972 as they are no longer required for the purpose which they are currently held, and for the purpose of carrying out development as set out in section 6 of this report.

3. To approve the appropriation of the land at the Chocolate Factory site (edged red in the plan attached at Appendix 1) from planning purposes to housing purposes

under Section 19 of the Housing Act 1985, after practical completion of the construction works.

4. To approve the appropriation of the land at the Chocolate Factory site (edged red in the plan attached at Appendix 1) from the General Fund to the HRA (at practical completion of the construction works) at the value of £500,000.00; representing the apportioned purchase and associated acquisition costs of the Chocolate factory site.

5. To approve the use of the Council's powers under Section 203 of the Housing and Planning Act 2016 to override easements and other rights of neighbouring properties infringed upon by the Chocolate Factory Phase 1 development under planning permission Ref: HGY/2017/3020 and by the subsequent s96a amendment to this permission, under planning Ref: HGY/2021/0624.

6. To delegate to the Director of Housing, Regeneration and Planning, after consultation with the Director of Finance and the Cabinet Member for House Building, Placemaking and Development authority to make payments of compensation as a result of any infringement arising from the development and the recommendation 3.1.3, within the existing scheme of delegation.

7. To note a total scheme-to-completion cost is contained at Appendix 3.

Reasons for decisions

The acquisition of the head leases held by Workspace over Council owned freehold land at the Chocolate Factory site and the neighbouring Mallard Place site were approved by Cabinet in October 2020. The intention was both sites would ultimately enter the Council's housing delivery programme, with the Chocolate Factory Phase 1 progressing first as it already had an extant planning consent. A s96a planning amendment has subsequently been approved to facilitate the development of the site (given the Council is acquiring part of the wider Chocolate Factory site with Workspace developing the rest).

Completion of the acquisition of the two head leases took place on 10th February 2022.The Council's site (known as the Chocolate Factory Phase 1) is now ready to progress to construction, with priority given to commencing development of the affordable housing. This report therefore marks the second, and final, Member-led decision to develop this site for social housing.

Following a formal tender process, a contractor has been identified to undertake these works.

The head leases will be merged with the freehold title which is held in the General Fund and appropriation of the Chocolate Factory Phase 1 site for planning purposes is required as it will allow the Council to use the powers contained in section 203 to override easements and other rights of neighbouring properties and will prevent injunctions that could delay or prevent the Council's proposed developments. Section 203 converts the right to seek an injunction into a right to compensation. The Chocolate Factory Phase 1 site will need to be appropriated back from planning

purposes to housing purposes on completion of the development to enable the Council to use the land for housing and let eighty new Council homes at Council rent.

The development of new Council homes and affordable workspace at the Chocolate Factory Phase 1 will also serve as the Council's first direct delivery project to contribute towards the objectives and ambitions of the 'Wood Green Cultural Quarter', a Council-led plan to coordinate the regeneration and economic development of the area to the west of the High Road in Wood Green

These recommendations are also necessary at this time to support the Council's ambition to achieve 1000 starts on site before the end of March 2022, with GLA grant funding for the site also being contingent upon achieving a start on site by this date.

Alternative options considered

It would be possible not to develop the Chocolate Factory Phase 1 site for housing. However, this option was rejected as it does not support the Council's commitment to deliver a new generation of Council homes and considering the rationale behind Cabinet's decision to acquire the head leases in the first place.

This opportunity was procured via a competitive tender using the Westworks Development and Construction Dynamic Purchasing System. The Council previously issued a tender via the London Construction Programme (LCP Major
Works 2019 Framework Agreement, the recommended route for a contract of this value, but this resulted in only a single tender being returned, which did not meet the Council's requirements, principally in relation to the construction cost. The choice of an alternative framework was considered and ultimately utilised only after first testing the Council's own procurement framework.

The Council could continue with the scheme without appropriating the site for planning purposes, but this would risk the proposed developments being delayed or stopped by potential third party claims. By utilising the powers under Section 203 of the Housing and Planning Act 2016 (HPA 2016), those who benefit from third party rights will not be able to seek an injunction since those rights or easements that are overridden are converted into a claim for compensation only. The Council recognises the potential rights of third parties and will pay compensation where a legal basis for such payments I established.

When seeking planning permission, Workspace actively engaged with local residents about the development of these sites as they proceeded through the feasibility and design stages and any comments or objections raised were taken into consideration by Planning Committee in reaching its decision. The Housing Delivery Team has also engaged with Ward Members and the Lead Member for Housebuilding, Place-making and Development, and ensured local stakeholders have been briefed on the progress of the scheme since becoming involved with the project. For these reasons, this option was rejected.

The Council could decide not to appropriate the land for housing purposes upon practical completion of the building works. This option was rejected because it could

prevent the Council from being able to offer up these homes for occupation as social housing thereby not supporting the delivery of much needed affordable homes.

Cllr Diakides did not take part in the discussion or voting on this item and re-entered the room at the end of the item.

765. GOURLEY TRIANGLE: ACQUISITIONS PROGRAMME AND PRE-CONTRACT PROJECT DEVELOPMENT

The Cabinet Member for House Building, Place-Making and Development introduced the report which sought agreement to the acquisition of the remaining third-party land interests on the site, based on the business case for the redevelopment of Gourley Triangle as set out in the report.

Cabinet noted that in agreeing to the acquisition of the properties within the site and the associated redevelopment, a capital bid would be submitted as part of the next Medium Term Financial Strategy (MTFS) for the cost of the works element of the development. This capital bid would be a self-financing bid.

Approval was also sought for the pre-contract budget (set out in exempt part of the attached report) to progress the development of the Site including an extension of the existing Contract with the multi-disciplinary design team through to submission of a planning application at the Royal Institute of British Architects (RIBA) Work Stage 2+.

Noted that the objectives for the site were set out in the July Cabinet paper where the draft Master Plan had been agreed and the Council were working with residents and local businesses to build up proposals which was essentially mixed-use proposal. There were heritage aspects to the sites noted and information provided on how they would be retained.

Following questions from Cllr Cawley- Harrison, the following information was noted:

- The process for decision making would take place through the gateway process outlined at CAB 760 and as this was a complex and detailed scheme, there would be advice provided by external advisers and specialist officer. Officers advised that the negotiations were taking place simultaneously as much as possible .

- In relation to considering ground contamination and potential financial impact, this would be worked through in the due diligence stage and considered with the third parties when compiling the acquisition price.

Further to considering the exempt information at item 772 and agreeing the exempt recommendations,

RESOLVED

1. To note the business case for the acquisition of the remaining third-party land parcels on “the Site” as set out in paragraphs 6.4-6.65 of the report.

2. To acquire, based on the business case, the remaining third-party land parcels coloured pink and situated within “the Site” outlined in red on the plan attached as Appendix 1 and to be held in the General Fund for planning purposes; and

3. To approve a budget for acquisitions as set out in 3.2, being a total sum set out in the exempt Part B of this report to be funded from the Strategic Acquisitions Fund.

4. To give delegated authority to the Director of Housing, Planning and Regeneration, after consultation with the Cabinet Member for Finance and Transformation and the Cabinet Member for House Building, Placemaking and Development, to agree the price for each acquisition and the final heads of terms and legal documentations.

5. To approve a budget for project development costs to Royal Institute of British Architects (RIBA) Work Stage 3+ (tender), being a total sum set out in the exempt Part B of this report to be funded from the Strategic Acquisitions Fund.

6. To approve the extension of the Contract with Haworth Tompkins Architects from RIBA Work Stage 1+ to RIBA Work Stage 2+ (planning application) for a total budget set out in the exempt Part B of this report.

7. To give delegated authority to the Director of Housing, Planning and Regeneration, after consultation with the Cabinet Member for Finance and Transformation and the Cabinet Member for House Building, Placemaking and Development, to approve a contingency sum in relation to the Contract extension with Haworth Tompkins Architects as set out in the exempt Part B of this report.

8. To note the key principles of the draft Business Retention and Relocation Strategy as set out in paragraph 6.25 of the report.

Reasons for Decision

The recommendations in this report support the delivery of the Gourley Triangle site allocation in Tottenham Area Action Plan (AAP). This site has long been identified as having the potential for renewal and placemaking given the poor quality of its current built environment.

Business Case and Land Acquisitions

The Council’s employment and economic growth aspirations are ambitious, seeking to deliver 12,000 jobs in the borough by 2026 as identified within the Local Plan Planning Obligations Supplementary Planning Document (2018). The business case set out in this report has workspace at its heart with new development aiming to secure

employment spaces that meet the needs of the post-Covid economy alongside wider Council objectives of placemaking, delivering council homes, and sustainability. With highly limited land supply in the borough, opportunities such as this should be carefully considered and maximised.

The Council is in a unique position to secure the Site Objectives for the Gourley Triangle. Acquisition of the remaining land interests will allow the Council control over the site and hence the ability to take forward a comprehensive redevelopment scheme.

Multi-Disciplinary Design Team Appointment

The project requires the appointment of a high quality and experienced multi-disciplinary design team to deliver the detailed planning application and technical design work to RIBA Work Stage 3+. In April 2021, Haworth Tompkins were appointed under delegated authority to deliver feasibility work up to RIBA Work Stage 1+. This paper seeks approval to extend this Contract to RIBA Work Stage 2+ as allowed for by the original procurement and give the option to approve a contingency sum under delegated authority if required.

Progression of the design to RIBA Work Stage 2+ will enable certain elements of the scheme to be designed in detail, ensuring that the planning application locks in quality that is protected from potential future value-engineering exercises.

Alternative Options Considered

Not agreeing the Business Case and Land Acquisitions

Not agreeing the business case and land acquisitions was rejected as it would mean that the Site would remain in its current form and would not deliver on the Masterplan Objectives noted by Cabinet in July 2021. This would result in a lost opportunity to support the Council's ambitious economic housing and growth targets as set out in the Borough Plan and result in an uncertain future for this important site.

Due to planning policy requirements and disparate land ownership, it is considered that the Council are the only party who are able to implement a holistic approach to development of the Site in a timely fashion. This report recommends such an approach.

Endorsing the business case but acquiring third party acquisitions at a later date

This option was considered and rejected. There is currently an opportunity to acquire third party land parcels and a number of third-party vendors have indicated that they have a compelling business reason to dispose at this time. Were the Council not to take the opportunity to acquire at this time, there is a risk that the sites could be sold on, and that development by a third party could take place which does not meet the Masterplan Objectives as noted by Cabinet.

This option also risks the loss of external funding from the Future High Street's Fund (FHSF) and Brownfield Land Release Fund (BLRF) as there is potential that the grant funding will need to be repaid if programme milestones are not achieved. The FHSF grant requires that it is spent by March 2024, and the BLRF grant requires land to be released for residential development also by March 2024. If these milestones are not met, then alternative funding sources would be required which would have a detrimental impact upon the scheme's deliverability and viability. Acquiring the third-party sites would provide the Council with a level of control which would not be achieved should land be owned on a piecemeal basis.

Re-procurement of the Multi-Disciplinary Design Team

The Council could seek to re-procure the services of a Multi-Disciplinary Design Team at this juncture. This option is not recommended as the original procurement exercise envisaged that the team would continue through to the next stage. It would be detrimental to the project in terms of time, cost, and quality to change the professional team at this stage in the project's delivery.

766. REFURBISHMENT OF SUPPORT AND WELLBEING HUBS

The Cabinet Member for Planning, Licensing, and Housing Services introduced the report which sought a number contract and financial decisions to facilitate works to the Support and Wellbeing hubs at Latimer House, Bigsbury Close, Hilldene Court, The Lindales, Sophia House, Lowry House and Palace Gates.

This would result in improved modern facilities in the internal communal areas within the hubs. These improvement works would provide better spaces that are more welcoming and promote a sense of belonging, with good quality facilities, easily accessible and flexible space, enabling different uses and activities.

The works would comply with current fire and building regulations and the overall project will contribute to helping to achieve the Borough Plan objectives for inclusive, accessible housing for end users with flexibility in the use that delivers benefits to the local community and external agencies.

Further to considering exempt information at item 30,

RESOLVED

1. That In accordance with Contract Standing Order (CSO) 9.07.1(d), to approve the award of a contract to the preferred contractor identified in exempt appendix A. Works included within this project include the following: Redecoration, lighting and electrical works, flooring, window dressings, new kitchens and bathrooms, communal radiators and covers, laundry room alterations, communal furniture and renewing of the main entrance communal doors, to the Support and Wellbeing hubs. This will be for the sum of £763,426.12.

2. To approve the issue of a letter of intent for an amount of up to, but not exceeding £76,342.61 which represents 10% of the contract sum.

3. To approve the total professional fees of £44,811.81 which represents 5.19% of the contract sum.

4. To approve the total project costs as shown in the exempt report. (Section 6.1).

Reasons for decision

Homes for Haringey requires Cabinet approval for the award of this contract, which is deemed to represent value for money. This is following a tender process undertaken in conjunction with Haringey Council's Procurement team via the Dynamic Purchasing Systems (DPS) from 'Principal Contractors' in the 'General Construction Multi-Trade for Housing & Residential' category.

The tender process was carried out in accordance with the procurement DPS requirements that incorporate price and quality. The successful compliant bidder scored the highest in relation to these criteria in the associated lot.

Alternative options considered

An alternative option would be for Homes for Haringey to use third party industry frameworks. Homes for Haringey sought support and advice from Haringey Strategic Procurement and determined Haringey Council's Dynamic Purchasing System as being the optimum route to the market. This was due to the speed of access to quality-checked contractors and focus on companies that concentrate their resources in the local area.

A do-nothing option would mean the Council is not able to deliver necessary capital investment works to improve the communal spaces and facilities of the Support and Wellbeing hubs, in accordance with the Asset Management Strategy 2020-25.

767. REVISED COMMUNITY INFRASTRUCTURE LEVY CHARGING SCHEDULE

The Cabinet Member for Planning, Licensing and Housing introduced the report which proposed to increase the CIL rates levied by the Council in the east of the borough for residential, student accommodation and build to rent housing. It was noted that until now, the CIL rate for residential development in the east of the borough has been £15 per square metre and the attached report proposed increasing it to £50 bringing it closer in line with residential rates elsewhere in the borough.

It was noted that the proposed rates would maximise financial contributions from development towards infrastructure whilst ensuring the economic viability of development and protecting the Council's ability to secure its preferred affordable housing tenures as part of new development.

In considering the attached report and its appendices Cabinet noted that the proposed decision would ensure that affordable housing and other 'section 106' financial

contributions from developments would not be jeopardised at a late stage in the planning process. The revised rates were proposed to take effect on 1 September 2022 and the developments in the immediate planning pipeline included Council-led housing schemes in the east of the borough. Cabinet further noted that the grace period before the new rates take effect would ensure that the financial model of cross-subsidy to maximise affordable housing was not put at risk.

Whilst the report is about the charges to developers and not about the expenditure of CIL, with regards to a question on the increased access and share of CIL funding in the west of the borough, it was noted that where there was a Neighbourhood Forum established, they had a right to pre-empt certain monies for the forum area. However, recent improvements in the way the Neighbourhood CIL spending formula was applied meant that monies could be moved to the areas where there was essential need.

Cabinet continued to consider the issue of fairer distribution of CIL funding and were further informed that, in summary, there were two separate elements to this question which were increasing rates to developer which the report was taking forward and secondly, how the CIL spending was distributed. The neighbourhood element of CIL was between 15 to 25% of what the Council collected and had to be spent in the neighbourhood area. It was previously acknowledged that in the east of the borough there were unequal distributions compared to the west of the borough but this had recently been corrected and a redistribution formula compiled on a fairer basis. Cabinet Member noted this issue.

RESOLVED

1. To note the Examiner's report on the examination of the partial review of Haringey's Community Infrastructure Levy Draft Charging Schedule, as modified set out in Appendix C of this report;

2. To note that Members of Strategic Planning Committee endorsed the Revised Community Infrastructure Levy Charging Schedule to take effect on 1 September 2022;

3. To consider and to recommend to Full Council that the Revised Haringey Community Infrastructure Levy Charging Schedule is approved and publicized as set out at Appendix D to take effect on 1 September 2022.

Reasons for decision

The increased CIL rates proposed in the CIL Eastern Charging Zone have been subject to an independent examination which found that they provide an appropriate basis for the collection of the levy in the borough and will not put the majority of developments at risk. The Examiner recommended that the Council may proceed to approve the amended rates subject to one minor modification. The Council has incorporated this modification within the Revised Charging Schedule for approval.

The amended rates are recommended to take effect from 1 September 2022. The Partial Review has been underway since 2016 and the Council's intent to increase certain CIL rates in the east of the borough has been clear since 2017. The period between Council approval and the rates being given effect will allow the planning authority to ensure that affordable housing and other 'section 106' financial contributions from developments will not be jeopardised by the effect of the new CIL rates at a late stage in the planning process i.e. after extensive pre-application negotiations or after a Planning Sub Committee resolution but pending the conclusion of signed S106 agreements and issuing of formal planning permissions (which trigger CIL liability). This is balanced with the objective of not delaying the effect date too far into the future with the Council missing out on potential increased infrastructure funding.

Alternative options considered

- Option 1 – Not to approve the Revised Charging Schedule and cancel the partial review. The disadvantage of this would be that CIL rates and therefore the number of financial contributions from developers for infrastructure would remain the same and would not be maximised. This option is rejected as the Examiner found that the rates in the Revised Charging Schedule provide an appropriate basis for the collection of the levy in the borough and will not put the majority of developments at risk.

- Option 2 – To bring the Revised Charging Schedule into effect earlier or later than the recommended 1 September 2022 date. An earlier effect date is rejected to allow the planning authority to ensure that affordable housing and other 'section 106' financial contributions from developments will not be jeopardized at a late stage in the planning process i.e., after extensive pre-application negotiations or after a Planning Sub Committee resolution but pending the conclusion of signed S106 agreements and issuing of formal planning permissions (which trigger CIL liability). Developments in the immediate planning pipeline include Council-led housing schemes in the east of the borough which would be liable to pay the increased CIL rate which could jeopardize the financial model of cross-subsidy to maximise affordable housing. A later effect date would minimize delivery risks for a greater number of schemes in the borough's pipeline however it would mean foregoing increased infrastructure contributions for a longer period. It is considered that an effect date of 1 September 2022 provides an appropriate balance between the various considerations and therefore the alternative options are rejected and not recommended.

768. MINUTES OF OTHER BODIES

RESOLVED

To note the minutes of other bodies.

769. NEW ITEMS OF URGENT BUSINESS

None

770. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

That the press and public be excluded from the meeting for the consideration of agenda items 28-32 as they contained exempt information as defined in Section 100a of the Local Government Act 1972; Paragraph 3 – information relating to the financial or business affairs of any particular person (including the authority holding that information; Paragraph 5 – information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

771. EXEMPT - LETTING OF BUILD CONTRACT FOR CHOCOLATE FACTORY PHASE 1

At this point in the meeting, Cllr Diakides left the room.

The Cabinet noted the exempt information and resolutions as per minute 764.

Cllr Diakides did not take part in the discussion or voting on this item and re-entered the room at the end of the item.

772. EXEMPT - GOURLEY TRIANGLE: ACQUISITIONS PROGRAMME AND PRE-CONTRACT PROJECT DEVELOPMENT

The Cabinet noted the exempt information and resolutions as per minute 765.

773. EXEMPT - REFURBISHMENT OF SUPPORT AND WELLBEING HUBS

The Cabinet noted the exempt information and resolutions as per minute 766.

774. EXEMPT - MINUTES

RESOLVED

That the exempt minutes of the Cabinet meeting held on 8 February 2022 be approved as a correct record.

775. NEW ITEMS OF EXEMPT URGENT BUSINESS

There were no new items of exempt urgent business.

CHAIR: Councillor Peray Ahmet

Signed by Chair ……..

Date ……

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Report for: 21 June 2022 Cabinet

Title: Adoption of the North London Waste Plan

Report authorised by: David Joyce, Director, Housing Regeneration and Planning

Lead Officer: Bryce Tudball, Interim Head of Planning Policy, Transport and Infrastructure

Ward(s) affected: All

Report for Key/ Non-Key Decision: Key

1. Describe the issue under consideration

1.1 As a Waste Planning Authority (WPA), the Council is responsible for producing a waste local plan that covers the land use planning aspect of waste management in Haringey in line with the Waste Management Plan for England.

1.2 To ensure that the Council meets this requirement and has up-to-date planning policies for waste, the seven North London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest have worked together to produce the North London Waste Plan ('NLWP').

1.3 Initial engagement on the NLWP began in 2013 with formal consultation held on the emerging Plan in 2015. In January 2019 Cabinet and Full Council approved the Proposed Submission NLWP for publication, consultation and subsequent submission to the Secretary of State as being ready for examination. Since that time an independent Planning Inspector has carried out an examination of the NLWP and in October 2021 his report was issued to the seven North London Boroughs indicating his finding that the North London Waste Plan is both legally compliant and sound, subject to Main Modifications. The Main Modifications include changes to the Plan arising as a direct result of community input into the plan-making process. To date, 4 out of 7 boroughs have adopted the NLWP with 3 boroughs remaining to adopt it including Haringey.

1.4 The NLWP sets out a land use planning framework for waste management in the North London Boroughs for the next 15 years covering the period 2021 to 2036 and, once adopted, it becomes part of the statutory Development Plan for Haringey and the other North London Boroughs, alongside Local Plans.

1.5 The purpose of the NLWP is firstly to ensure to ensure that new waste facilities are directed towards the most suitable areas in North London, to protect the environment and the amenity of local residents, and that the Boroughs' identified waste management needs are met; and secondly to provide policies against which planning applications for waste development will be assessed, alongside other relevant planning policies/guidance.

1.6 The NLWP is a separate entity to the North London Waste Authority (NLWA). The NLWP is a joint project supporting the seven Councils' sovereign Waste Planning Authority (WPA) functions, which are effectively the same functions the Council has as Local Planning Authority (LPA), but for the specific issue of waste planning. The NLWA is a body that manages waste transportation and disposal on behalf of the seven London boroughs and does not have any formal powers in the production of the NLWP. The NLWA as a third party has submitted representations to the NLWP promoting waste management sites and approaches to minimise waste.

1.7 This report seeks Cabinet agreement to refer this report and the appended documents to Full Council with the recommendation to adopt the North London Waste Plan and associated changes to the Policies Map.

2. Cabinet Member Introduction (Cabinet Member for Housing services, private renters, and planning)

2.1 Every local authority has a statutory duty to produce a Waste Local Plan which identifies potential new sites for waste management and treatment facilities and sets out the policies to determine planning applications for waste management. Haringey Council has decided to achieve this through a partnership with its 6 neighbouring boroughs and the development of the NLWP.

2.2 Since 2013 borough officers and members from all seven authorities have been working collaboratively to resolve the complexities of planning for the management of North London's waste. In 2019 the Council approved the Draft NLWP for publication, consultation and subsequent submission to the Secretary of State for examination and following an examination in public an independent Planning Inspector has found the NLWP legally compliant and sound, subject to Main Modifications. The Plan can now proceed to final adoption by the respective Councils with 4 out of 7 having already adopted it.

2.3 The chosen approach to future waste management in North London is to meet the area's waste management needs by identifying existing capacity and land for new facilities to manage the equivalent of all Local Authority Collected Waste, Commercial and Industrial, Construction and Demolition waste, including hazardous waste, generated in North London, while recognising that some imports and exports will continue (net self-sufficiency). The NLWP plans to move waste up the waste hierarchy by diverting as much waste as possible away from disposal to landfill by identifying land suitable for recycling and recovery facilities.

2.4 The NLWP directs new waste facilities towards locations assessed and selected as the most suitable in North London which are identified as "Priority Areas". Three of the ten Priority Areas in the NLWP are located within Haringey: the former Friern Barnet Sewage Works (also known as Pinkham Way), North Tottenham Strategic Industrial Location and the Brantwood Road Strategic Industrial Location. Each of these sites is identified as potential suitable for recycling. The concerns expressed by the community in relation to Pinkham Way site are noted, however following consideration of these concerns at the Examination of the NLWP a variety of mitigations are included within the adoption version of the plan to address them and the independent Planning Inspector has consequently found the proposal to designate the site as a Priority Area to be

sound. Because the Examination has concluded and the Plan has been found sound there can be no further changes to it at this stage.

2.5. The NLWP is a balanced plan that takes on board conflicting agendas and priorities. On the basis that it has proven through Examination to be a justified and robust waste policy document, Haringey Council should welcome and endorse it. Having an adopted Plan in place will help the Council to ensure the sustainable development of waste uses including maximising recycling and will be key in guarding against speculative development of waste uses in inappropriate locations. An adopted Plan will mean the Council has greater control and influence over any planning applications forthcoming, and will enable the policies, which have been shaped with community input, to take effect.

3. Recommendations

Cabinet is asked to:

1) Note the content of this report and the Inspector's Report on the North London Waste Plan (set out in Appendix A);

2) Note the comments of Strategic Planning Committee as set out in the addendum;

3) Agree to refer this report and the appended documents to Full Council with the recommendation to adopt the North London Waste Plan (Appendix C) including Main Modifications (Appendix B) and associated changes to the Policies Map.

4. Reasons for decision

4.1 To enable the NLWP to progress to adoption at Full Council, and to ensure the North London Boroughs have a robust and up-to-date policy framework to ensure the sustainable management of waste arising in the area. Adoption of the plan will allow for waste planning proposals to be directed to the most appropriate locations in the area as well as providing detailed requirements for waste facilities to be assessed against through the planning application process. The Main Modifications include changes to the Plan arising as a direct result of community input into the plan-making process. Further, the NLWP will provide certainty and clarity for the community and other stakeholders on how such applications would be assessed.

5. Alternative options considered

5.1 The Council could decide not to adopt the North London Waste Plan. However, as a Waste Planning Authority the Council is under a statutory obligation to produce a Waste Local Plan. In addition, the National Waste Management Plan for England, supported by the National Planning Policy for Waste (NPPW), identifies that the National Waste Management Plan will be supported by each WPA's Waste Local Plan and as such this document is of significant importance.

5.2 Any Waste Plan must be prepared in line with the requirements of the Planning and Compulsory Purchase Act 2004, the Waste (England and Wales)

Regulations 2011, the Town and Country Planning (Local Planning) (England) Regulations 2012 and the NPPW. Given the NLWP has been found legally compliant and sound by the Planning Inspectorate, and has been through a robust process, not to proceed to adopt the NLWP would result in the Council needing to commence a Haringey only Waste Local Plan and would undermine the adopted NLWP for the other six partner Boroughs. This would not be in accordance with the Council's commitments so far as part of its legal 'duty to cooperate' with other authorities as explained later in the report. This option has been rejected by officers as not being a reasonable alternative.

5.3 Any delay to the NLWP or any lack of having a Local Waste Plan will mean that planning applications may come forward in an ad hoc unplanned way and the Council will not have a robust and up-to-date policy framework for determining them against. It may be more difficult to shape, influence or refuse undesirable waste planning proposals or planning applications. Communities would have less certainty and clarity on how planning applications would be assessed and there would be less certainty for investment in the borough for sustainable development. There would also be a detrimental impact and delay to the Council's emerging new Local Plan because there would be reduced certainty on waste priority areas and policies.

5. Background information

Preparation of NLWP

5.4 Due to the complexities of planning for the management of waste across the entire North London area it has taken a considerable time to prepare the NLWP. In February 2012 Cabinet agreed for the Council to prepare the current version of the NLWP in accordance with the relevant Regulations while meeting the duty-to-cooperate. In April 2013 the seven North London Boroughs invited representations about what the NLWP ought to contain. A series of focus group events were subsequently held in 2014 to further develop the Draft NLWP.

5.5 In July 2015 Cabinet approved consultation on the Draft NLWP. The subsequent consultation over a nine-week period during July-September 2015 provided the first opportunity for stakeholders to make comments on the strategy for future waste management land use planning in North London, potential locations for new facilities across the area, and policies.

5.6 In January 2019 Full Council approved the Proposed Submission NLWP for consultation, submission and subsequent examination. The Proposed Submission North London Waste Plan took account of comments made on the Draft Plan as well as an updated Data Study and changes to national, regional and local policies. There was a delay between this stage and the previous stage following concerns with the plan raised principally by Enfield Council.

5.7 Consultation on the Proposed Submission NLWP took place in March-April 2019. This consultation, as well as the previous two, were all carried out in accordance with the Council's relevant Statement of Community Involvement (SCI).

5.8 The NLWP was submitted to the Secretary of State for public examination by a Planning Inspector in August 2019. Public hearings took place in November

2019. Resident groups had ample opportunity to share their concerns directly with the independent Inspector in writing and in person during the examination and hearings in an open and transparent way to ensure their points are heard and fully considered by the Inspector and Councils. In response to the issues raised in the examination and hearing sessions, the North London Boroughs prepared a Schedule of Proposed Modifications to the NLWP. The Proposed Modifications were published for consultation during October-December 2020. The Boroughs prepared responses to the representations on Main Modifications which were given to the Inspector for him to consider in the final stages of the examination and to inform the recommendations in his final report.

5.9 The Inspector's Report was issued to boroughs on 27 October 2021 (attached as Appendix A to this report). It confirms that, subject to Main Modifications, the Plan is legally compliant and sound, and recommends that it can proceed to adoption by the Boroughs. 4 boroughs out of 7 have since adopted the NLWP (Hackney, Islington, Barnet and Waltham Forest).

5.10 This report seeks adoption of the North London Waste Plan (Appendix C) including Main Modifications (Appendix B) and associated changes to the Policies Map.

Main Modifications

5.11 A summary of the Main Modifications since Full Council last approved the NLWP in 2019 are set out below with full details available in Appendix B:

- Amending the Aims and Strategic Objectives of the Plan to ensure general conformity with the London Plan.
- Amendments to Section 4 of the Plan to ensure that the approach to the management of waste over the Plan period and the identification of the location for new facilities are consistent with Aims and Strategic Objectives.
- Ensuring that the evidence and the calculation methodology for the identified waste that needs to be managed in the Plan area and over the Plan period is fully justified and explained.
- Ensuring that the selection process to identify areas to manage the identified waste needs over the Plan period is consistent with the spatial principles of the Plan and fully justified and explained.
- Ensuring that the methodology and justification for the identification of Preferred Areas for the management of North London's waste over the Plan period are justified and explained.
- Ensuring that the Plan's policies ensure that waste management development proposals provide an adequate balanced approach to protect people and the environment whilst delivering the aims, strategic objectives and spatial principles of the Plan.
- Revising the monitoring and implementation framework to provide a more robust mechanism to assess the delivery of the Plan against its aims, strategic objectives and spatial principles.
- Revising the guidance in Appendix 2 regarding the detailed development requirements to accompany any future planning applications for waste management development within the identified Priority Areas.

- Other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

Overall approach and benefits of the NLWP

5.12 The chosen approach to future waste management in North London is to meet the area's waste management needs by identifying existing capacity and land for new facilities to manage the equivalent of all Local Authority Collected Waste (LACW), Commercial and Industrial (C&I), Construction and Demolition waste (C&D), including hazardous waste, generated in North London, while recognising that some imports and exports will continue (net self-sufficiency). The NLWP follows the principle that waste should be managed as close as possible to its source to support sustainability and reduce unnecessary transport journeys. The NLWP supports the sustainable management of waste by seeking to move waste up the waste hierarchy including diverting as much waste as possible away from disposal to landfill by identifying land suitable for recycling and recovery facilities.

Spatial principles

5.13 The NLWP is underpinned by the following spatial principles:

A. Make use of existing sites
B. Seek a better geographical spread of waste sites across North London, consistent with the principles of sustainable development
C. Encourage co-location of facilities and complementary activities
D. Provide opportunities for decentralised heat and energy networks
E. Protect local amenity
F. Support sustainable modes of transport

Targets

5.14 The London Plan projects how much LACW and C&I waste is likely to be generated in the capital over the next 20 years and apportions an amount of these two waste streams to each borough. The North London Boroughs have pooled their apportionments and will meet this collectively through existing sites and Priority Areas for new waste management facilities.

5.15 In addition, the London Plan 2021 sets recycling and recovery targets which have been built into the NLWP as follows:

Waste stream	**Target**	**2016 baseline**
LACW	Contributing towards 65% recycling of municipal waste by 2030	27%
C&I	Contributing towards 65% recycling of municipal waste by 2030	44%
C&D	95% reuse/recycling/recovery	93%
Excavation	95% beneficial use	Not known
Biodegradable or recyclable waste	Zero biodegradable or recyclable waste to landfill by 2026	Not known

Capacity gap

5.16 The capacity gap is the difference between projected waste arisings and existing / pipeline capacity. There is not enough waste management capacity in North London to deal with the amount of LACW, C&I and hazardous waste projected. There is sufficient capacity to meet the projected amount of C&D waste arisings over the plan period. The capacity gaps / surplus over the plan period for each main waste stream is summarised in the table below.

Waste Stream	Capacity	2020	2025	2030	2035
LACW/C&I	Capacity gap	-101,218	-78,013	-125,058	-174,579
C&D	Capacity surplus	+175,640	+156,690	+136,956	+116,404
Hazardous	Capacity gap	-49,169	-49,169	-49,169	-49,169

5.17 To meet the capacity gaps, the North London Boroughs will seek opportunities for new capacity through intensification of existing sites and/or new facilities. The capacity gaps represent approximately 6.4 hectares of land, but the amount of land required depends on the type of facility and the technology being used. New technologies may come forward during the plan period which require less land. The NLWP policies will help with maximising the capacity of a site while mitigating any environmental impacts. The land required is indicative only and new capacity will be monitored rather than land. To meet higher recycling targets, there is a need for additional recycling capacity for both LACW and C&I waste streams throughout the plan period.

Existing sites

5.18 The plan safeguards the waste management capacity of existing waste sites and permits expansion or intensification of operations at existing waste sites where the proposal is in line with the relevant aims and policies. Existing waste sites are safeguarded for waste use in the London Plan and also through the NLWP.

Priority Areas for new waste facilities

5.19 The NLWP takes an area-based approach to waste planning with no individual sites allocated for new waste facilities. An area-based approach is one which identifies areas which comprise a number of individual plots of land, for example, an industrial estate or employment area, that is in principle suitable for waste use but where land is not specifically safeguarded for waste uses. The NLWP directs new waste facilities towards locations assessed and selected as the most suitable in North London which are identified as “Priority Areas”.

5.20 The identification of ‘Priority Areas’ allows for flexibility in bringing forward a range of locations across North London, allowing for a better geographic spread of opportunities for future waste development that is consistent with the spatial principles of the plan to meet North London’s requirement.

5.21 In order to deliver the strategic objective of a better geographical spread of facilities, each Borough’s current contribution to waste management capacity in

North London was calculated. To address concerns that there is an over-concentration of waste facilities in Enfield and to promote a better geographic spread of waste facilities in North London, the number of Priority Areas within Enfield has been limited.

5.22 The following Priority Areas for new waste management facilities are identified in the NLWP:

Area ref	Area Name	Size (ha)	Borough	Waste Facility Type				
				A	B	C	D	E
A02-BA	Oakleigh Road	0.99	Barnet	X		X		X
A03-BA	Brunswick Industrial Park	3.9	Barnet	X				X
A04-BA	Mill Hill Industrial Estate	0.9	Barnet	X				X
A05-BA	Connaught Business Centre	0.9	Barnet	X				X
A12-EN	Eleys Estate	26.1	Enfield	X	X	X	X	X
A15-HC	Millfields Locally Significant Industrial Site	1.48	Hackney					X
A19-HR	Brantwood Road	16.9	Haringey	X			X	X
A21-HR	North East Tottenham	15.32	Haringey	X			X	X
A22-HR	Friern Barnet Sewage Works/ Pinkham Way	5.95	Haringey	X	X			X
A24-WF	Argall Avenue	26.91	Waltham Forest	X	X			X

Key to Waste Management Facility.
A – Recycling
B - Composting (including indoor / in-vessel composting)
C - Integrated resource recovery facilities / resource parks
D - Waste recovery or treatment facility (including thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment)
E - Waste transfer.

5.23 An additional three areas are identified within the area of the London Legacy Development Corporation (LLDC) because it is the planning authority for small parts of Hackney and Waltham Forest. The boroughs cannot make planning allocations in their area but under the MoU that the boroughs have agreed with the LLDC three areas have been identified as potentially suitable for waste use.

Area ref	Area Name	Size (ha)	Borough	Waste Facility Type				
				A	B	C	D	E
LLDC1-HC	Bartrip Street	0.6	Hackney	X				X
LLDC2-HC	Chapman Road (Palace Close)	0.33	Hackney	X				X
LLDC3-WF	Temple Mill Lane	2.1	Waltham Forest	X	X			X

Priority Areas in Haringey

5.24 The table following paragraph 5.22 shows that the NLWP identifies three Priority Areas within Haringey: Friern Barnet Sewage Works/ Pinkham Way, Brantwood Road, and North East Tottenham. The table indicates which waste facility types each of these sites would potentially be suitable for. Of note, each of the sites is identified as being capable of supporting recycling (Waste Facility Type A) and none of the sites are identified as being capable of supporting integrated resource recovery facilities / resource parks (Waste Facility Type C.

5.25 It is noted that the Priority Areas in Haringey cover a greater geographical area than Priority Areas identified in any other single borough. This is primarily because of the size of the Brantwood Road and North East Tottenham Priority Areas. It is important to note that the NLWP takes an area-based approach to waste planning with no individual sites allocated for new waste facilities (see 5.19). Waste developments are not proposed for these entire areas rather the plan supports individual plots within these areas coming forward for waste uses dependent upon future identified needs. Haringey's sites are not suitable for all waste uses as set out in para 5.24. Other boroughs' sites have been identified for certain uses which Haringey's have not. If the Council was to plan for its need alone then it would have to plan for the full range of waste developments including integrated resource recovery facilities / resource parks which may also require more sites in Haringey. The NLWP as a whole will deliver sustainable and self-sufficient management of waste in North London, provides important safeguards to preserve the environment and local amenity and will support the Council to avoid speculative applications in inappropriate locations.

Pinkham Way

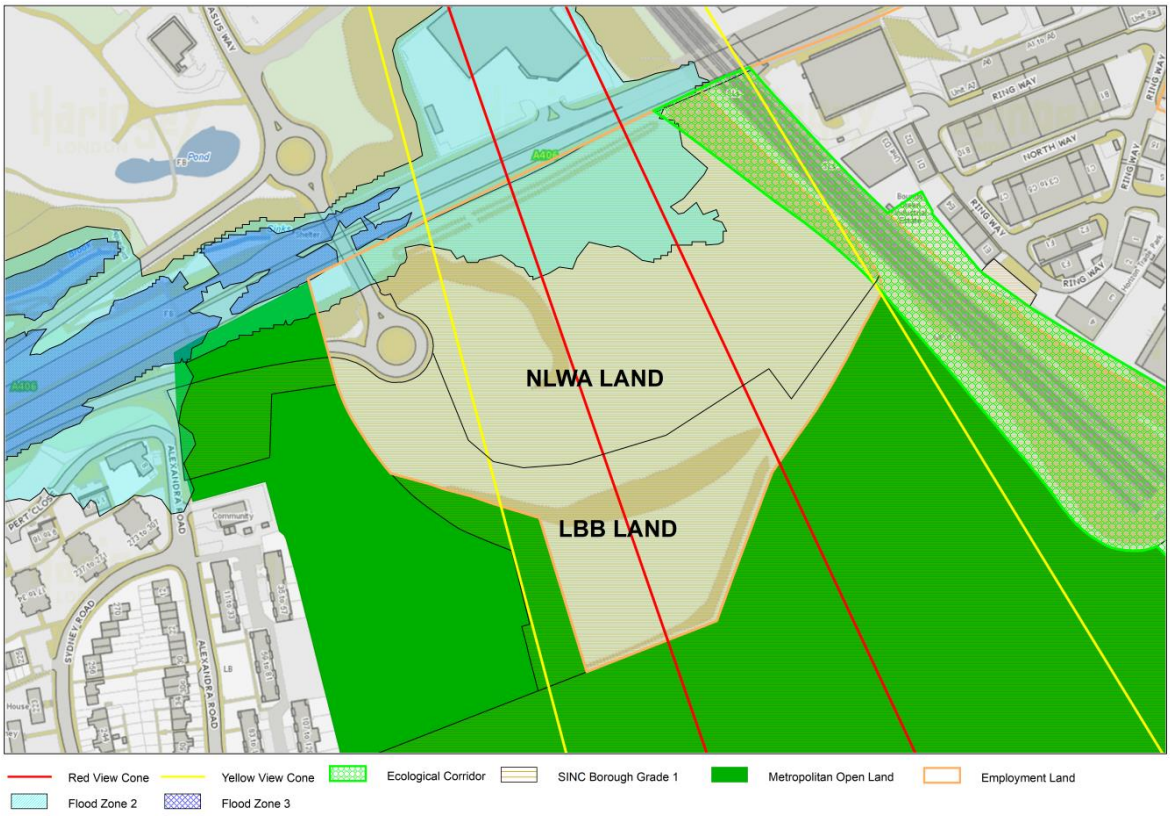
5.26 The Former Friern Barnet Sewage Works (also known as Pinkham Way) is owned by the North London Waste Authority and Barnet Council and was put forward by them during the NLWP's preparation as a site suitable for waste management. The site is designated in the Council's existing Local Plan as Employment Land and is also a Site of Importance for Nature Conservation (SINC).

5.27 The NLWP identifies Pinkham Way as a Priority Area for new waste management facilities. It sets out that the site would be appropriate for Waste Facility Types A (Recycling), B (Composting (including indoor / in-vessel composting) and E (Waste transfer). It sets out that the site is not suitable for Waste Facility Types C (Integrated resource recovery facilities / resource parks) and D (Waste recovery or treatment facility). An incinerator would fall within Waste Facility Type C therefore the NLWP says Pinkham is not suitable for this type of use.

5.28 The site's inclusion within the Plan has been subject to considerable opposition from nearby residents. The objections are principally based upon: the fact that it is designated for employment use but has not been in employment use for decades; that part of it is in an area at risk of flooding; and the open nature of the site and its biodiversity value.

5.29 Having regard to identified community concerns, the Council made modifications to the site guidelines during the examination process to more fully reflect the site's constraints (e.g. flood risk, natural environment and biodiversity), to make clear that only a proportion of the overall site area will be suitable for development, and

to make explicit that the smaller part of the site in the North London Waste Authority's ownership is most likely to accommodate any development. The NLWP does not specifically identify a suitable developable area but the map below, which shows landownership and key identified constraints, provides an indication of the developable area for information purposes.



5.30 The site guidelines specifically acknowledge the potential for development to impact on the natural environment and set out specific policy considerations should an application come forward. This includes delivering biodiversity net gain and suitably mitigating any loss of trees including through replanting. Any application which comes forward for the site will be assessed against the natural environment and biodiversity policies in the London Plan and the Council's Local Plan and will also be subject to legal requirements around biodiversity net gain which come into effect in 2023. The opportunities for providing new public access within part of the site are recognised and the site guidelines provide that any planning application for new development should demonstrate how public access to the undeveloped part of the site could be achieved.

5.31 In paragraph 138 of his report the Inspector set out that the question arose whether Pinkham Way should be deleted as a Priority Area, and that he had carefully considered the written and oral evidence provided regarding this proposed allocation. His considerations set out in paragraphs 139 to 145 included:

- The issue of dual designation of the site as Employment Land and a SINC, which he concluded was not a matter for the NLWP as it is already established in Haringey's adopted Strategic Policies Local Plan;

- The evidence on flood risk to the site, which taking into account a Main Modification, confirmed the plan's approach to consideration of flood risk on the site is sound; and
- That Priority Areas do not need to comprise previously developed land.

5.32 The Inspector concluded in paragraph 146 of the Report that he was satisfied that the plan's site selection process is sound with regard to the identification of Priority Areas (including in relation to Pinkham Way) and that the relevant constraints for the areas identified have been appropriately considered and taken into account.

5.33 At this stage there is no specific proposal for the site. The NLWP indicates it could be suitable for recycling, composting (including indoor / in-vessel composting) or waste transfer. While the principle of one of these uses on the site is accepted in the NLWP, this does not mean planning permission would be automatically granted for one of these uses rather any proposal would be subject to the normal planning application requirements and all other relevant Local Plan policies would need to be considered including securing local employment opportunities, and an increase in biodiversity and replacement trees. The Priority Area designation does not necessarily preclude other alternative uses being brought forward, although planning law does require that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise.

Northumberland Park

5.34 The other two 'Priority Areas' for waste are located within Northumberland Park ward and are the North Tottenham Strategic Industrial Location and the Brantwood Road Strategic Industrial Location. These allocations are area-based rather individual sites. An area-based approach is one which identifies areas which comprise a number of individual plots of land that is in principle suitable for waste use but where land is not specifically safeguarded for waste uses (see para 5.19). Both North Tottenham Strategic Industrial Location and the Brantwood Road Strategic Industrial Location are currently designated employment land suitable by definition for industrial uses including waste. Notwithstanding this, given their location in the proximity of nearby sensitive receptors including residential land, the NLWP contains provisions to ensure these concerns are adequately addressed should a proposal come forward for a waste site, including that any proposed facilities should be enclosed and consideration should be given to siting any future proposals towards the centre of the area away from any sensitive receptors amongst other detailed criteria.

Policies

5.35 There are eight development management policies in the NLWP which cover the following areas:

1. Existing waste management sites
2. Priority Areas for new waste management facilities
3. Windfall sites
4. Re-use and Recycling Centres
5. Assessment criteria for waste management facilities and related development

6. Energy recovery and decentralised energy
7. Wastewater treatment works and sewage plant
8. Inert waste

Monitoring

5.36 The Boroughs have agreed to monitor the NLWP annually through a lead borough agreement. Monitoring indicators include waste arisings, management capacity, location of new facilities and imports/exports.

Duty to Co-operate

5.37 There is a legal requirement for Waste and Local Plan documents to fulfil the 'duty to co-operate' with relevant bodies and other planning authorities when dealing with strategic matters such as waste planning. The North London Boroughs have prepared Statements of Common Ground with each Waste Planning Authority around the country which receives strategic amounts of North London's waste. The Statements of Common Ground are the culmination of six years of duty to co-operate engagement and they set out the waste planning situation as it currently stands. The boroughs will continue to monitor waste exports from North London, through the Authority Monitoring Report (AMR), and engage with Waste Planning Authorities when and if there are any substantial changes which may affect waste planning in their area.

Timetable

5.38 Four boroughs have already adopted the NLWP (Hackney, Islington, Barnet and Waltham Forest) with 3 remaining to adopt it (Haringey, Camden, Enfield). Adoption by all seven North London Boroughs is targeted by Summer 2022. Subject to this Cabinet decision, it is intended for the NLWP to be considered by Haringey's Full Council for adoption.

London Plan 2021 – Greater London Authority (GLA)

5.39 Local Plans in London need to be in general conformity with the London Plan in accordance with Section 24(1)(b) of the Planning and Compulsory Purchase Act 2004. Throughout the examination liaison has taken place with the GLA, and the Mayor has issued confirmation that he considers the NLWP to be in conformity with the London Plan.

North London Waste Authority

5.40 The NLWP is completely separate from the North London Waste Authority (NLWA). The NLWA is a body that manages waste transportation and disposal on behalf of the seven London boroughs and does not have any formal powers in the production of the NLWP. The NLWA as a third party has submitted representations to the NLWP promoting waste management sites and approaches to minimise waste.

Edmonton Eco Park

5.41 Most Local Authority Collected Waste within the seven North London Boroughs is managed at the Edmonton Eco Park facility. The NLWA's long term waste management solution is based upon the continued use of the existing Edmonton facility until 2025 and the development of a new energy recovery facility on the same site to be operational from 2025 onwards.

5.42 In respect of the latter facility and its planning status, the NLWA received a Development Consent Order from the Secretary of State in 2017 to develop a new Energy Recovery Facility with capacity of around 700,000 tonnes per annum to deal with all the residual waste under the control of the Authority from 2025 until at least 2050.

5.43 The NLWP does not and cannot change the planning status of the new Energy Recovery Facility which already has planning permission. The continued use of the Edmonton Eco Park facility for waste land use planning purposes is safeguarded by the plan and its important contribution towards its waste targets is recognised. The Edmonton Eco Park site is not part of any of the NLWP's proposed Priority Areas for new waste management facilities although is adjacent to the 'Eleys Estate' Priority Area in Enfield.

6. Contribution to strategic outcomes

6.1 Waste planning accords with the delivery of the Council's corporate objectives as it will help the Council to manage waste in line with objectives to reduce, reuse and recycle which contribute to a cleaner, greener Borough, and to drive growth and employment through directing new waste facilities to appropriate employment locations. In particular it contributes to Borough Plan outcome 10 – A cleaner, accessible and attractive place through promoting the waste hierarchy of minimising waste and recycling and reducing the amount sent to landfill. It also complements the Council's Reduction and Recycling Plan through safeguarding existing waste sites.

6.2 A full Sustainability Appraisal has been prepared and updated through various iterations of the NLWP as it has progressed, with the latest attached as Appendix E. This helps ensure the NLWP is in accordance with the Council's sustainability objectives as well as to meet legal requirements for planning policy documents set out in The Environmental Assessment of Plans and Programmes Regulations 2004.

7. Statutory Officers comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

Finance

7.1 This report requests Cabinet to approve the recommendations as set out in para. 3 of this report and there are no costs attached to the adoption of the plan. However, the council will have to bear one seventh of the costs for the monitoring and administration post adoption of the plan which is estimated to be up to £5k per annum which will be met from existing Planning Budgets.

Procurement

7.2 There are no procurement implications.

Head of Legal & Governance

7.3 The Council is the waste planning authority for Haringey and as such has a statutory duty under the Planning and Compulsory Purchase Act (2004) to produce a Waste Local Plan.

7.4 The Waste (England and Wales) Regulations 2011 were published in accordance with the provisions of the Pollution Prevention and Control Act 1999 and set out the framework for the national Waste Management Plan for England.

7.5 The Waste Management Plan for England 2021 together with the National Planning Policy for Waste set out the requirements for Waste Local Plans.

7.6 The Council is working alongside six other London boroughs to produce a single Waste Local Plan to cover the entire administrative area of the seven London Boroughs – the North London Waste Plan. This approach will ensure that an operational Waste Local Plan is in place for the Council and the six other London Boroughs.

7.7 The draft North London Waste Plan has been through the necessary statutory process prior to adoption and has been found to be sound by an independent Planning Inspector.

7.8 In accordance with the Council's constitution, approval of Development Plan Documents is a function of Full Council and therefore the Waste Local Plan must be approved prior to adoption by Full Council.

7.9 It is the view of legal services that the approval and adoption of the North London Waste Plan in accordance with the recommendations within this report is in accordance with the law, as set out in this section.

Equality

7.4 The Council has a Public Sector Equality Duty under the Equality Act 2010 to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share those protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not.

7.5 The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

7.6 An Equality Impact Assessment has been carried out on the NLWP and is provided at Appendix F. It found no negative differential impacts on any equality strand.

7.7 The area selection process took into account the proximity of sensitive receptors (such as schools and hospitals), thereby helping to minimise the impact on vulnerable sections of the community. Implementation of the policies and proposals should not lead to unacceptable adverse effects on different communities.

7.8 Of note for Haringey, two of the 'Priority Areas for new Waste facilities' are located within Northumberland Park on Strategic Industrial Land. Within Northumberland Park ward nearly 17% of people have a long-term illness or disability which limits their day-to-day activities to some extent. The ward is also one of the most deprived in Haringey. Demographically, over half of the population are from ethnic minorities or mixed race. Northumberland Park has a higher level of multiple deprivation than average, and is in the lowest 20% in the country, with the highest Universal Credit claimant count in the borough. Therefore, particularly with reference to deprivation, outcomes in this ward could be worse for these groups, and lead to adverse outcomes particularly around health.

7.9 The other 'Priority Area for a new Waste facility' is in Alexandra ward. Within this area 11% of people have a long-term illness or disability which limits their day-to-day activities to some extent. However the ward has no areas in the lowest 20% of most deprived wards in the country. Some parts of the ward are in the 10% least deprived. Demographically 20% of the population from ethnic minorities or mixed race. Across both wards there is a similar split of roughly 50/50 between men and women, however Alexandra Park has a slightly older age profile with 10% being above 65 as opposed to 8% in Northumberland Park, with 33% of people in Northumberland Park being under 20 and 25% in Alexandra Park. This wards profile suggests that as with Northumberland Park, certain groups may be more susceptible to adverse outcomes particularly with regards to health.

7.10 Therefore the main impact would potentially be on health given the nature of waste management uses. The NLWP mitigates against this by acknowledging that within Northumberland Park there are a number of environmental and amenity issues facing the area such as the proximity of residential properties and Significant Open Space, and as such the Plan makes clear that the area is not suitable for external facilities. Additional guidance states that facilities should therefore be enclosed and consideration should be given to siting any future proposals towards the centre of the area away from any sensitive receptors. Key mitigation measures should include dust suppression and other measures such as wheel-washing. This has therefore led to the equality impact assessment concluding there would be no negative differential impacts on the groups likely to be impacted by adverse health outcomes, particularly those in lower social economic groups where health can be lower.

7.11 Within Alexandra Ward the NLWP outlines that again, there are some sensitive receptors near the site, notably residential properties to the west, however these are much more remote to the site than in Northumberland Park. Notwithstanding

this, the plan identifies a number of environmental and amenity issues that would need to be addressed which would help mitigate against impacts on equalities groups should the site be developed upon. These measures would be required to protect the amenity of sensitive receptors including hours of working, noise and odour suppression. Consideration would also be given to the creation of an appropriate buffer between any waste management facility and nearby sensitive receptors. Therefore the conclusion of the Equalities Impact Assessment is that there would be no negative differential impacts on the groups likely to be impacted by adverse health outcomes due to the Plans inbuilt policy and mitigation measures.

8 Use of Appendices

Appendix A NLWP Inspector's Report
Appendix B Schedule of Modifications
Appendix C NLWP (for adoption)
Appendix D Sustainability Appraisal
Appendix E Equality Impact Assessment

9 Local Government (Access to Information) Act 1985

12 February 2021 Report to Cabinet on North London Waste Plan – Non-adoption and revision:
https://www.minutes.haringey.gov.uk/documents/s29574/North%20London%20Waste%20Authority%20-%20covering%20report%20all%20public.pdf

14 July 2015 Report to Cabinet on draft North London Waste Plan :
https://www.minutes.haringey.gov.uk/documents/s79670/Cabinet%20Report%20-%20North%20London%20Waste%20Plan.pdf

31 January 2019 Report to Full Council on Pre-Submission Consultation on the North London Waste Plan:
https://www.minutes.haringey.gov.uk/documents/s106648/1NLWPReg19ConsultationFullCouncilReportfinaljan232019finalsubmitted.pdf

All supporting documents can be found at www.nlwp.net

The Planning Inspectorate

Report to the Councils of the London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest

by Stephen Normington BSc DipTP MRICS MRTPI FIQ FIHE

an Inspector appointed by the Secretary of State

Date: 27 October 2021

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the North London Waste Plan

The Plan was submitted for examination on 8 August 2019

The examination hearings were held between 20 and 21 November 2019

File Ref: PINS/X5210/429/13.

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Abbreviations used in this report

CEP	Circular Economy Package
C&D	Construction and Demolition Waste
CD&E	Construction, Demolition and Excavation Waste
C&I	Commercial and Industrial Waste
DCO	Development Consent Order
DtC	Duty to Co-operate
EqIA	Equality Impact Assessment
ERF	Energy Recovery Facility
GLA	Greater London Authority
HRA	Habitats Regulations Assessment
JWS	Joint Waste Strategy
LACW	Local Authority Collected Waste
LEA	Local Employment Area
LES	London Environment Strategy
LLDC	London Legacy Development Corporation
LLW	Low Level Radioactive Waste
LSIS	Locally Significant Industrial Land
MM	Main Modification
NLWA	North London Waste Authority
NPPF	National Planning Policy Framework
NPPW	National Planning Policy for Waste
ROCs	Renewable Obligations Certificates
RRCs	Recycling and Reuse Centres
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCIs	Statements of Community Involvement
SFRA	Strategic Flood Risk Assessment
SIL	Strategic Industrial Land
SINC	Sites of Importance for Nature Conservation
SPA	Special Protection Area

Non-Technical Summary

This report concludes that the North London Waste Plan (the Plan) provides an appropriate basis for waste planning within the London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest (the Borough Councils) provided that a number of main modifications [MMs] are made to it. The Borough Councils have specifically requested that I recommend any MMs necessary to enable the Plan to be adopted.

Following the hearings, the Borough Councils prepared schedules of the proposed modifications and, where necessary, carried out Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) of the changes. The MMs were subject to public consultation over a six-week period. I have recommended the inclusion of the MMs in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Amending the Aims and Strategic Objectives of the Plan to ensure general conformity with the London Plan.

- Amendments to Section 4 of the Plan to ensure that the approach to the management of waste over the Plan period and the identification of the location for new facilities are consistent with Aims and Strategic Objectives.

- Ensuring that the evidence and the calculation methodology for the identified waste that needs to be managed in the Plan area and over the Plan period is fully justified and explained.

- Ensuring that the selection process to identify areas to manage the identified waste needs over the Plan period is consistent with the spatial principles of the Plan and fully justified and explained.

- Ensuring that the methodology and justification for the identification of Preferred Areas for the management of North London's waste over the Plan period are justified and explained.

- Ensuring that the Plan's policies ensure that waste management development proposals provide an adequate balanced approach to protect people and the environment whilst delivering the aims, strategic objectives and spatial principles of the Plan.

- Revising the monitoring and implementation framework to provide a more robust mechanism to assess the delivery of the Plan against its aims, strategic objectives and spatial principles.

- Revising the guidance in Appendix 2 regarding the detailed development requirements to accompany any future planning applications for waste management development within the identified Priority Areas.

- A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains my assessment of the Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended) (the 2004 Act). It considers first whether the Plan is in general conformity with the Spatial Development Strategy i.e. the London Plan. It then considers whether the Plan's preparation has complied with the Duty to Co-operate (DtC), whether the Plan is compliant with the legal requirements and whether it is sound. Paragraph 35 of the National Planning Policy Framework 2021 (NPPF) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.

2. The starting point for the examination is the assumption that the Borough Councils have submitted what they consider to be a sound plan. The North London Waste Plan Regulation 19 Proposed Submission - January 19 (CD1/1), submitted in August 2019 is the basis for my examination. It is the same document as was published for consultation in March 2019.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act, the Borough Councils requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1, MM2** etc, and are set out in full in the Appendix.

4. Following the examination hearings, the Council prepared a schedule of proposed MMs and, where necessary, carried out sustainability appraisal and habitats regulations assessment of them. The MM schedule was subject to public consultation for six weeks in October-December 2020. I have taken account of the consultation responses in coming to my conclusions in this report.

Policies Map

5. The Plan when adopted will require changes to the Borough Councils Policies Maps. The Plan does not include its own Policies Map. Each of the Borough Councils have their own Policies Map that relates to all the

planning documents in their Local Development Framework, including this Plan.

6. The Policies Maps are not defined in statute as development plan documents and so I do not have the power to recommend main modifications to them. However, to ensure that the Plan is effective, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the Policies Map of the relevant Borough Council. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Borough Councils will need to update the adopted Policies Maps to include all the changes proposed by the MMs.

Context of the Plan

7. The Plan is intended to provide the policy framework for decisions by the seven North London Boroughs on waste matters over the period to 2035. Each of the seven North London Boroughs have strategic waste policies contained within their adopted Local Plan. However, the strategic waste policies defer to this Plan to provide a more detailed planning framework for waste development.

8. One of the key tasks is to meet the apportionment set out in the London Plan (2021). This projects how much Local Authority Collected Waste (LACW) and Commercial and Industrial Waste (C&I) is likely to be generated in London up to 2041. It apportions a percentage share of these two waste streams to be managed by each London Borough with an objective that the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026.

9. Each of the seven North London Boroughs have pooled their apportionments and propose to meet this collectively through existing sites and land allocated in the Plan. The Plan has two main purposes:

    - to ensure there will be adequate provision of suitable land to accommodate waste management facilities of the right type, in the right place and at the right time up to 2035 to accommodate the amount of waste required to be managed in North London; and

    - to provide policies against which planning applications for waste development will be assessed.

10. The majority of existing waste management sites are located in the east of the Plan Area, in particular in the Lee Valley corridor. The Plan is therefore underpinned by a need to secure a better geographical spread of waste management sites across North London and an objective to achieve net self-sufficiency for LACW, C&I, Construction and Demolition (C&D) waste and hazardous waste streams.

11. The Plan area also includes part of the London Legacy Development Corporation (LLDC), a Mayoral Development Corporation, which is the planning authority for a small part of Hackney and Waltham Forest and other Boroughs that are not part of the North London Borough Councils. The LLDC is not allocated a share of the waste apportionment and the Plan is required to provide the planning policy framework for waste generated across the whole of the seven Borough's, including the parts of Hackney and Waltham Forest that lie within the LLDC Area.

12. The Plan cannot directly allocate sites/areas within the LLDC area as this is the responsibility of LLDC as local planning authority. However, a Memorandum of Understanding is in place that enables sites/areas identified as being suitable for waste management uses in the Plan in those parts of Hackney and Waltham Forest in the LLDC area to be allocated in the LLDC Local Plan.

General conformity with the London Plan

13. The Plan must be in general conformity with the Spatial Development Strategy i.e. the London Plan, under the terms of S24 of the Planning & Compulsory Purchase Act 2004 (as amended) (2004 Act). The London Plan 2016, which was in place at the time of the submission of the Plan and for most of the examination, has now been replaced by the London Plan published in March 2021 (the London Plan 2021).

14. Some of the proposed MMs and parts of the Data Study Addendum (CD1/23) are in response to the requirements of adopted London Plan 2021 Policies SI 7 (Reducing waste and supporting the circular economy), SI 8 (Waste capacity and waste net self-sufficiency) and SI 9 (Safeguarded waste sites). The relevant MMs are discussed later in this report.

15. Subject to the necessary MMs, the Mayor of London, in a letter dated 17 March 2021, confirmed that the Plan is in general conformity with the London Plan 2021 (CD1/16/MM).

Revised National Planning Policy Framework

16. On 20 July 2021 the Government published revisions to the NPPF. This was after the close of the consultation period on the MMs and before the issue of this report. In accordance with Paragraph 220, policies in the revised NPPF apply to all plans that were submitted for examination after 24 January 2019 and consequently its provisions apply to this Plan. The Boroughs and those parties who made representations at the consultation stage of the MMs were invited to submit any comments on the implications of the revised NPPF that may be relevant to the consideration of the soundness of the Plan.

17. Overall, the revised NPPF has no significant implications for the aims, strategic objectives or policies proposed in the Plan. However, the

Boroughs have proposed minor revisions to supporting text provided in paragraphs 4.26, 9.41 and 9.48 of the Plan. These paragraphs are already subject to proposed MMs (**MM11**, **MM93** and **MM96** respectively). The proposed modifications as a consequence of the revised NPPF have been incorporated into these MMs.

18. The necessary changes to the MMs are limited to a reference to "ultra-low and zero emission vehicles", in the case of paragraphs 4.26 and 9.41, and reference for development to make "as much use as possible of natural flood management techniques and be appropriately flood resistant and resilient" in the case of paragraph 9.48.

19. I consider that the suggested changes to the MMs are minor and do not necessitate any further public consultation. I have discussed these changes in the context of the consideration of the relevant MMs below.

20. Any references to the NPPF in this report relate throughout to the revised NPPF published on 20 July 2021 unless otherwise stated.

Public Sector Equality Duty

21. Throughout the examination, I have had due regard to the equality impacts of the Plan in accordance with the Public Sector Equality Duty, contained in Section 149 of the Equality Act 2010. The Equality Impact Assessment (January 2019) (EqIA) (CD1/17) identifies that the Plan does not lead to any adverse impacts or cause discrimination to any particular groups within the Plan area.

22. I have detected no issue that would be likely to impinge upon the three aims of the Act to eliminate discrimination, advance equality of opportunity and foster good relations or affect persons of relevant protected characteristics of age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. Overall, I have no reason to question the conclusions of the submitted EqIA that the Plan is not expected to discriminate against any sections of the community.

Assessment of Duty to Co-operate

23. Section 20(5)(c) of the 2004 Act requires that I consider whether the Borough Councils have complied with any duty imposed on them by section 33A in respect of the Plan's preparation. When preparing the Plan the Borough Councils are required to engage constructively, actively and on an on-going basis with a range of local authorities and a variety of prescribed bodies in order to maximise the effectiveness of plan preparation with regard to strategic, cross-boundary matters.

24. Details of how the Borough Councils have met this duty are set out in the 'Duty to Co-operate Report (August 2019)' (CD1/12), the 'Consultation Statement (August 2019)' (CD1/3) and the Borough

Councils' written responses to pre-hearing questions (CD5/9). These documents set out where, when, with whom and on what basis co-operation has taken place over all relevant strategic matters.

25. The evidence demonstrates that the Borough Councils have worked closely with neighbouring waste planning authorities, as well as some further afield where a strategic relationship was identified, throughout the plan-making process.

26. Also evident is the effective relationship the Borough Councils have established and maintained with all of the relevant bodies listed in Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). In addition, consultation has taken place with a wide range of organisations and bodies as part of the formal consultation process. It is clear that many of the pre-submission changes to the Plan that were brought forward by the Borough Councils were as a result of consultation with relevant parties to address their concerns in a constructive and active manner.

27. It should be emphasised that the Duty to Co-operate (DtC) is not a duty to agree. Consequently, it is quite possible for it to be complied with, but for there to be outstanding matters between the Borough Councils and other bodies. However, those matters do not lie with the DtC but with the content of the Plan which is addressed elsewhere in this report. Those disputes may relate to matters regarding the soundness of the Plan, but an unresolved dispute is not evidence of a failure in the DtC.

28. Overall, I am satisfied that, where necessary, the Borough Councils have engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the DtC has therefore been met.

Assessment of Other Aspects of Legal Compliance

Local Development Scheme

29. The Plan has been prepared in accordance with the Local Development Schemes of the Borough Councils (CD1/15). All of these schemes share the same content and timetable for the production of the Plan.

Public consultation and engagement

30. During various stages of Plan preparation, consultation on the Plan and the MMs was carried out in compliance with the adopted Statements of Community Involvement (SCIs) for each of the Borough Councils. The requirements of these SCIs were reflected in the Plan Consultation Protocol (CD1/18). The Consultation Statement – August 2019 (CD1/3) and the Consultation Report – Main Modifications Consultation – March 2021 (CD1/3/MM) provide evidence of how community involvement has been achieved.

Sustainability Appraisal

31. The Plan was subject to Sustainability Appraisal (SA) during its preparation (CD1/2). Addendums to the SA were also produced to inform the proposed main modifications (CD1/2/Add and CD1/2/Add-MM). No statutory consultees have raised any significant concerns about the sustainability appraisal process.

32. Overall, I am satisfied that the sustainability appraisal was proportionate, objective, underpinned by relevant and up to date evidence, and compliant with legal requirements and national guidance.

Habitats Regulations Assessment

33. The Plan was subject to a Habitats Regulations Assessment (HRA) during its preparation (CD1/14) as required by the Conservation of Habitats and Species Regulations 2017 (as amended). The HRA identifies that the Plan is compliant with the Habitats Regulations and will not result in likely significant effects on any of the Natura 2000 Sites identified, either alone or in combination with other plans and projects in the Plan area.

34. The assessment considered the effect of the implementation of the Plan on European protected sites within 10km of the Plan area which includes the Lea Valley Special Protection Area (SPA) and RAMSAR site, Epping Forest Special Area of Conservation (SAC) and the Wormley-Hoddesdon Park SAC.

35. A HRA Addendum – September 2020 (CD1/14/Add) assessed the MMs to consider whether they affect the conclusions set out in the main HRA of November 2019. This identified that the MMs do not have any implications for the HRA.

36. Both Assessments conclude that any potential harmful impacts on the nature conservation value of European sites that could arise from the implementation of the Plan can be avoided or mitigated and identifies that Policy 5 of the Plan provides an important safeguard for European sites in this regard. No statutory consultees or other relevant organisations dispute the findings of the HRAs. Therefore, I am satisfied that the relevant legal requirements relating to Habitats Regulations Assessment have been met.

Climate Change

37. Section 19(1A) of the 2004 Act requires that development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the Plan area contribute to the mitigation of, and adaptation to, climate change. The Plan includes objectives and policies designed to secure that waste development and

use of land for such purposes within the Plan area contribute to the mitigation of, and adaptation to, climate change (Strategic Objectives 6 and 7 and Policies 5 and 6).

38. The Flood Risk Sequential Test Report (CD1/11) is informed by information contained within each of the Borough's Strategic Flood Risk Assessments (SFRA) and Surface Water Management Plans which take into account all the sources of flooding within the Plan area. This report, and the Flood Risk Addendum (CD1/11/Add), demonstrate how the Sequential Test has been applied to the proposed waste management sites/areas in the Plan and identifies how the Plan has satisfied the NPPF's requirements in regard to flood risk and the consideration of the impact of flood risk elsewhere as a result of proposed development.

39. Subject to **MM4**, which is discussed below, Policies 5 and 6 will help to ensure that the development and use of land will contribute to the mitigation of, and adaptation to, climate change. Accordingly, the Plan, taken as a whole, achieves the statutory objective prescribed by Section 19(1A) of the 2004 Act.

Strategic priorities

40. The Plan's aims and strategic objectives set out the Borough Councils' high level strategic priorities. These are then addressed through the subsequent policies for waste development and use of land for such purposes in the Plan area.

Other legal requirements

41. The Plan complies with all other relevant legal requirements, including the 2004 Act (as amended) and the 2012 Regulations.

Conclusion

42. I therefore conclude that all relevant legal requirements have been complied with during the preparation of the Plan.

Assessment of Soundness

Main Issues

43. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified eight main issues upon which the soundness of this Plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan.

Issue 1 – Whether the Aims and Strategic Objectives of the Plan are in general conformity with the London Plan, are appropriate and

sound to provide a suitable basis for meeting the future waste management needs of North London sustainably.

44. The Plan sets out the preferred option for how the waste management needs of the seven North London Boroughs are to be met to 2035 for principal waste streams comprising LACW, C&I, Construction, Demolition and Excavation (CD&E), Hazardous, Agricultural, Waste Water/Sewage Sludge and Low level radioactive waste (LLW). It seeks the retention and provision of a network of waste management facilities to enable the sustainable management of waste to achieve net waste self-sufficiency.

45. The Plan's purpose is to ensure an adequate provision of suitable land to accommodate waste management facilities of the right type, in the right place and the right time up to 2035 and to provide policies against which planning applications for waste development will be assessed. It includes a single overarching aim and a number of strategic objectives that provide the basis for waste management infrastructure, contribute to the conservation of resources by promoting improvements to the efficiency of processing and making better use of the waste created within North London.

46. The introductory chapter to the Plan explains that a number of spatial principles have informed the detailed policies and the site/area selection for new waste management facilities. However, the introductory text provided in paragraph 1.3 of the Plan does not adequately explain how the strategic objectives of the Plan have informed the spatial principles. **MM1** is therefore necessary to explain how the spatial principles flow from the strategic objectives. This is necessary to ensure that the Plan is effective. This MM also proposes similar modifications to paragraph 4.1 of the Plan which will be discussed later in this report.

47. The 'Aim' of the Plan is identified in paragraph 3.3. This explains the aim of achieving net self-sufficiency for LACW, C&I, C&D, including hazardous waste streams and a need for an integrated approach to move the management of waste further up the waste hierarchy. However, the Aim does not adequately explain what is meant by net self-sufficiency in the context of the management of waste. In addition, it does not promote the beneficial use of excavation waste nor does it recognise that the waste facilities that are required during the Plan period are necessary to meet the identified needs for waste management. Consequently, the Aim of the Plan is not in accordance with Chapter 9 of the London Plan. **MM2** addresses this matter and is necessary to ensure general conformity with the London Plan and that the Plan is effective.

48. Paragraph 9.8.18 of the London Plan identifies that hazardous waste makes up a component of all waste streams and is included in the apportionments for household, commercial and industrial waste. The Plan also identifies that hazardous waste is a sub type of LACW, C&I, C&D waste streams. However, it also identifies hazardous waste as a

waste stream in its own right in the calculation of the capacity gap and the need for new hazardous waste facilities.

49. In this regard, the question arises whether there is a lack of clarity and consistency in the Plan regarding its approach to hazardous waste. Both the Plan and, to some extent, the London Plan recognise that hazardous waste can be a component of LACW, C&I and C&D waste streams. The Plan recognises that this component requires specialist management that is separate to the management of these waste streams.

50. The approach of the Plan is to therefore identify the capacity gap for the hazardous waste element of these waste streams and consider the need for new facilities to manage this as a waste stream in its own right. Whilst this can appear as being inconsistent, I am satisfied that the Plan adequately explains its approach to identifying the sources of hazardous waste, calculation of the capacity gap for the management of this as a waste stream, and the identification of new facilities needed, throughout the relevant sections of the Plan.

51. The Plan identifies eight strategic objectives that demonstrate how the Aim is to be met and identifies the relevant policies in the Plan through which each of the objectives will be delivered. The purpose of the strategic objectives is set out in paragraph 3.4 of the Plan. However, this does not adequately explain how these objectives are intended to deliver the Aim of the Plan or the relationship with policies that are identified. **MM3** addresses this matter and is necessary for the Plan to be effective.

52. Strategic Objective SO3 relates to the achievement of net self-sufficiency for LACW, C&I, C&D and hazardous waste streams. However, it does not identify the need for development to seek the beneficial use of excavation waste or that monitoring of waste exports is necessary to assess the effectiveness of the Plan in meeting this objective. In this context, SO3 is also partially inconsistent with the modifications made to the Plan as a consequence of **MM2**. In addition to the modifications identified above, **MM3** also addresses these matters and is necessary in order for the Plan to be effective.

53. Paragraph 2.27 of the Plan identifies how the respective strategies of each of the North London Boroughs are driven by the requirements to mitigate and adapt to the effects of climate change. Whilst this paragraph explains that the Plan aims to deliver effective waste management to combat climate change, it does not adequately explain how this is intended to be achieved. **MM4** proposes additional text to paragraph 2.27 to explain how the Plan seeks a reduction in disposal to landfill, lowering of emissions from road transport and direct new development to appropriate sites taking into account a greater occurrence of urban flood events. This MM is necessary to ensure that the Plan is positively prepared and is effective.

Conclusion on Issue 1

54. Subject to the identified MMs, I am satisfied that the Aims and Strategic Objectives of the Plan are in general conformity with the London Plan, are appropriate and sound to provide a suitable basis for meeting the future waste management needs of North London sustainably.

Issue 2 – Whether the Spatial Framework for waste management is appropriate, is fully justified by the evidence and is soundly based.

55. Section 4 of the Plan sets out the spatial framework, renamed as spatial principles, that have informed its approach to the management of waste over the Plan period and the proposed locations for new facilities. This culminates in the identification of six underpinning spatial principles (A to F) set out in paragraph 4.4. These seek to make better use of existing sites (A); seek a better geographical spread of waste sites across North London consistent with the principles of sustainable development (B); encourage co-location of facilities and complementary activities (C); provide opportunities for decentralised heat and energy networks (D); protect local amenity (E) and support sustainable modes of transport (F). Each of these spatial principles are further explained in Section 4.

56. Paragraph 4.2 provides part of the supporting text that identifies how the spatial principles flow from the Plan's Strategic Objectives. However, **MM5** is necessary to provide further clarity in paragraph 4.2 to explain that the spatial principles have taken into account the Plan's evidence base and the views of stakeholders. This is necessary for the Plan to be justified.

57. Paragraph 4.11 provides part of the explanatory text to Spatial Principle B. It identifies some of the factors that influence the location of new waste sites to achieve a better geographical spread of facilities in North London. However, it fails to recognise that part of the Plan area includes land allocated as Green Belt. **MM6** provides additional text to explain that most waste facilities would be regarded as inappropriate development in the Green Belt unless very special circumstances could be demonstrated. This MM is necessary in order for the Plan to be effective and consistent with national policy and the London Plan.

58. Although Spatial Principle B seeks a better geographical spread of waste sites across North London, the Plan does not adequately explain why the current location of facilities may not be of the right type and in the right place to meet waste management needs up to 2035. As such, there is insufficient justification to support the need for Spatial Principle B. **MM7** introduces a new paragraph describing the geographical spread of existing waste sites and referencing Figure 9, which has been revised and renumbered as Figure 5, showing the

location of existing waste sites in the Plan area. This demonstrates that there is a concentration of existing waste sites in the Lee Valley corridor and mainly in the London Borough of Enfield.

59. **MM7** further explains that Enfield currently contributes 62% of land currently in waste use in North London, compared to 18% in Barnet, 12% in Haringey and 5% or less in the remaining constituent Boroughs. This MM also assists in justifying the need to create a more sustainable pattern of waste development across North London and is necessary in order for the Plan to be effective and justified.

60. I recognise that the Plan could have adopted a more detailed analysis of waste arising to determine a more precise geographic location of new facilities needed by seeking to locate these in close proximity to the source. Instead, the approach adopted in the Plan predominantly relies on the use of administrative boundaries to help determine how a better geographical spread of sites across North London should be achieved. However, I consider the adopted approach to be sound, particularly given the strong competition for land in North Land and the difficulty this creates in defining precise locations, as will be explained later in this report.

61. Paragraph 4.12 also provides supporting text to Spatial Principle B. It identifies that Policy 2 (Priority Areas for new waste management facilities) of the Plan seeks to extend the existing spread of locations for waste facilities by identifying locations that are suitable for waste management use. However, it does not explain how the Plan intends to achieve a better geographical spread of waste facilities as set out in Spatial Principle B.

62. **MM8** proposes additional text to paragraph 4.12. This explains that Section 8 of the Plan sets out how 'Priority Areas' for new waste facilities in the Plan area have been identified. This includes limiting the number of Priority Areas in Enfield and introduces an area based approach that identifies certain industrial and employment areas as being the most suitable for waste management uses. It further explains that Policy 2 promotes an 'outside of Enfield first' approach in considering new proposals for waste management and identifies that the combination of existing waste sites and Priority Areas will provide a more sustainable and appropriately located network of waste facilities in the Plan area. This MM is necessary for the Plan to be effective.

63. Spatial Principle C seeks to encourage the co-location of facilities and complementary activities. This refers to the need to move towards a more 'circular economy' which is a European Commission (EU) initiative (Circular Economy Package) to which the Government has signed up to delivering the targets contained therein as part of the UK leaving the EU. In simple terms, a circular economy is an alternative to a traditional linear economy comprising make, use and dispose of goods to one in which they are retained in use for as long as possible, extracting the

maximum value from them while in use, then recover and regenerate products and materials from them at the end of their service life.

64. The supporting text to Spatial Principle C sets out the benefits of co-location of facilities but does not explain how the Plan will achieve this. **MM9** is therefore necessary for effectiveness and provides additional text after paragraph 4.17 of the Plan. This explains that Policy 2 provides a spatial focus towards the encouragement of co-located activities on land with similar existing uses.

65. In addition, this MM explains that Policy 3 (Windfall Sites) allows for opportunities of locating recycling facilities near to a reprocessing plant that could use the recycled material. It also explains that Policy 5 (Assessment Criteria for waste management facilities and related development) requires waste development proposals to consider the possible benefits of the co-location of activities.

66. Spatial Principle D identifies that the Plan will provide opportunities for decentralised heat and energy networks. **MM10** proposes additional text to supporting paragraph 4.18 of this spatial principle and identifies how policies in the London Plan (Policies SI 8 and SI 3 Part D1e) also encourage waste management proposals where they contribute towards renewable energy generation, low emission heat/cooling combined heat and power and heat networks. This MM is necessary for the Plan to be effective and in general conformity with the London Plan.

67. Spatial Principle E identifies that the Plan will support sustainable modes of transport. The supporting text to this spatial principle explains that road is the main mode of transport for waste but identifies that North London is well served by rail and waterway networks that could be used to transport waste. Whilst the supporting text identifies the opportunities and benefits of using more sustainable methods of transportation other than road, it does not adequately explain how the Plan will achieve this.

68. **MM11** therefore provides additional text to paragraph 4.26 of the Plan to explain that Policy 5 requires the consideration of sustainable transport modes in waste development proposals. It also explains that traffic movements can have an impact on amenity along the routes used and that Policy 5 also seeks to minimise such impacts where possible with reference to the use of low emission vehicles. This MM is necessary for the Plan to be effective.

Conclusion on Issue 2

69. I am satisfied that the Spatial Framework for waste management contained within Section 4 of the Plan, when considered with the recommended MMs, is appropriate, is fully justified by the evidence and is sound.

Issue 3 – Whether the Plan provides an appropriate and robust basis to identify the waste that needs to be managed in the Plan area and over the Plan period and is fully justified by the evidence.

70. Section 5 of the Plan describes the current picture of waste management in the Plan area including the amount of waste generated, how and where it is currently managed. This section provides the baseline of how waste is currently managed in the Plan area. This is informed by the Waste Data Study, the last version prepared in 2019, which is produced in three parts and uses 2016 as a baseline year. Part One considers the 'North London Waste Arisings' (CD1/6); Part Two considers the 'North London Waste Capacity' (CD1/7); Part Three is the 'North London Sites Schedule' (CD1/8) which provides information on existing waste management facilities in each of the constituent North London Boroughs and includes the maximum capacity for each facility and the waste types that they can manage.

71. Section 2 of the National Planning Policy Framework for Waste (NPPW) requires, amongst other things, that Plans should be based on a proportionate evidence base using a robust analysis of best available data and information. The issue arises whether the way waste data presented in the Plan is sufficiently clear and in a logical order to enable a reader to adequately determine waste needs, capacity gaps and the justification for the approach to the retention of existing facilities and the identification of new facilities.

72. A 'Data Study Addendum' (CD1/23) was prepared in 2020 that proposed amendments to the way waste data is presented in the Plan. **MM12** provides additional text to paragraph 5.3 to explain that the Data Study Addendum has been used to improve the clarity of data presented in the Plan. This MM is necessary for the Plan to be justified and consistent with national policy.

73. The Plan identifies that currently 30% (845,776 tonnes) of the waste generated in the Plan area comprises LACW, 27% (762,301 tonnes) comprises C&I waste, 26% (747,242 tonnes) excavation waste, 15% (443,180 tonnes) C&D waste, 2% (53,420 tonnes) Hazardous Waste and less than 1% (9,223 tonnes) Agricultural Waste. The total amount of waste generated being 2,861,062 tonnes.

74. Not all of the above waste is managed within the Plan Area. **MM13** provides additional text to the pie chart in Figure 8, renumbered as Figure 9, that shows the percentage waste arisings and identifies that 66% of waste generated is managed within the Plan area. This MM also introduces a revised Table 4 which identifies the amount of waste managed within the Plan Area and elsewhere. This MM is necessary for the Plan to be justified.

75. **MM14** provides for revisions to Table 4 to more clearly show the amount of waste for each of the waste streams identified above that is managed in the Plan area, managed elsewhere in London, exported to landfill outside London and exported to other facilities outside London. This MM is necessary for the Plan to be justified.

76. In considering the cross boundary movements of waste, paragraph 8 of the Plan identifies that North London does not have all the types of facilities necessary to manage all of the identified sub types of waste. In particular, there are few specialist hazardous waste facilities and no landfill sites in the Plan area so waste that requires to be managed at these types of facilities will need to continue to be exported. However, the Plan also recognises that in order to achieve a net self-sufficiency in waste management capacity within the Plan area and move the treatment of waste up the waste hierarchy, exports of waste will need to be balanced out by an equivalent amount of additional capacity within the Plan area.

77. **MM15** provides for the existing paragraph 5.29 of the Plan to be brought forward to appear after paragraph 5.8. The current paragraph 5.29 identifies that in 2016 around 1 million tonnes of waste was imported into the Plan area for management within transfer stations, treatment facilities and metal recycling sites.

78. **MM15** also provides for revisions to the paragraph to explain that additional capacity that is necessary over the Plan period will be provided by existing facilities which already import waste from outside North London in line with market demands. The type of facilities that have catchment areas wider than the Plan area include metal recycling, end of life vehicle facilities and facilities for the processing of C&D and excavation waste into recycled aggregates. This MM is necessary for the Plan to be justified.

79. Paragraph 5.27 of the Plan considers waste that is exported from within the Plan area for disposal to landfill. **MM16** provides for revisions to the text in this paragraph that updates the amount of waste recorded as being exported from North London in 2016 to 1.4 million tonnes, 675,788 tonnes of which went to landfill. This MM also explains that most of the waste deposited to landfill was excavation waste (65%) followed by LACW/C&I (35%). The MM also identifies that the source data for hazardous waste exports to landfill is the 'Waste Data Interrogator' and the 'Hazardous Waste Data Interrogator'. This MM is necessary for the Plan to be justified.

80. **MM17** provides for three new paragraphs to provide additional text to explain the need and nature of cross-boundary movements of waste (imports and exports). These paragraphs further reinforce the fact the drive for net-sufficiency means that waste will still be imported and exported into North London. In addition, the MM refers to Table 6 of the Plan which, amongst other things, identifies the amount of waste which

is expected to be disposed to landfill over the Plan period. This MM is necessary for the Plan to be effective.

81. Paragraphs 5.31 and 5.32 of the Plan further consider the continued need for some waste to be deposited to landfill but recognises that there will be a scheduled closure of some of the currently available landfill sites during the Plan period. **MM18** provides for additional text and some deletions to the current text of paragraph 5.32 to explain that landfill capacity is declining across the wider south east and no non-hazardous landfill sites are likely to be brought forward by waste operators. Whilst some capacity will remain, associated with the restoration of mineral working sites, the MM reinforces the need for the Plan to manage waste further up the waste hierarchy to help reduce the need for landfill capacity. This MM is necessary for the Plan to be justified and effective.

82. Section 6 of the Plan identifies the future waste management requirements for each waste stream over the Plan period. Paragraph 6.3 and Table 5 of the Plan set out recycling and recovery targets up to 2030 from a 2016 baseline. However, these targets are not reflective of those provided in the recently adopted London Plan.

83. **MM19** therefore provides for the necessary revisions to the paragraph and table to provide consistency with the London Plan. These identify the aim of a 65% target of recycling of municipal waste from the LACW and C&I waste streams by 2030, 95% reuse/recycling/recovery of C&D waste by 2030, 95% beneficial use of excavation waste by 2030 and zero biodegradable or recyclable waste to landfill by 2026. This MM is necessary for the Plan to be consistent with the London Plan and effective.

84. Although the Plan explains that the UK has signed up to delivering the targets set out in the EU Circular Economy Package (CEP), the components of achieving a recycling target of 65% municipal waste by 2030 have been partially superseded by the London Environmental Strategy (LES) published in May 2018. This identifies that the 65% target will be achieved through a 50% recycling rate from LACW by 2025 and 75% from business waste by 2030 which are collective targets across the whole of London. The LES therefore goes further than the CEP by bringing forward London's LACW recycling target to 2025. **MM20** reflects the change in the recycling targets introduced as a consequence of the LES and is necessary for the Plan to be effective.

85. The question arises whether the Plan should be more explicit in identifying how the recycling targets should be met. However, the Plan is a land use planning document and one of its roles is to identify land suitable for waste management facilities. It is part of a range of strategy documents required to be prepared by a number of organisations across North London to demonstrate, in more detail, how the recycling targets are to be met. The Borough Councils, as waste

collection authorities, are required to prepare 'Reduction and Recycling Plans'. In addition, the North London Waste Authority (NLWA) has a responsibility to prepare a strategy on how the Mayor's recycling targets are to be met.

86. The level of detail provided in the Plan to demonstrate the land use planning approach to meeting the recycling targets is sound. More detailed waste management actions are provided in other documents and strategies.

87. Whilst the Plan identifies the London Plan target of 95% beneficial use of excavation waste by 2030, it does not explain what is meant by 'beneficial use'. **MM21** provides some examples that this could include using excavated material within a development, habitat creation, flood defence work or landfill restoration with a preference to using the material on-site or within local projects. This MM is necessary for the Plan to be effective.

88. Paragraph 6.4 explains that a range of options and alternatives were considered to model the predicted waste arisings in the Plan area over the Plan period. **MM22** proposes amendments and additions to this paragraph. These explain that the options considered leading to a preferred strategy included the effects of future activity, fiscal and legislative changes to landfill, financial incentives such as Renewable Obligations Certificates (ROCs) that increase the competitiveness of energy recovery, employment growth leading to an increase in C&I and CD&E waste streams and the proposed Energy Recovery Facility at Edmonton EcoPark from 2026.

89. **MM23** introduces a new Table which sets out the capacity options, growth options and management options for the LACW, C&I, C&D, Excavation, Hazardous and Agricultural waste streams. This takes into account various recycling, recovery, treatment and disposal scenarios and displays, in a summarised tabular form, some of the details provided in Part 2 of the Waste Data Study (CD1/7). This MM is necessary for the Plan to be justified and effective.

90. Amendments to paragraph 6.4 are provided by **MM24** and incorporate supporting text to the new Table provided by **MM23**. Amongst other things, these summarise that the preferred option is identified in Part 2 of the Waste Data Study and explains how a management option of net self-sufficiency was chosen based on growth of 0.81% over the Plan period. This preferred option is based on evidence provided by the Greater London Authority (GLA) and maximisation of recycling to move the management of waste further up the waste hierarchy. This MM is necessary for the Plan to be justified and effective.

91. Paragraph 6.5 of the Plan provides a simple formula that demonstrates the chosen approach to identify the projected waste arisings over the Plan period following the option appraisal as set out in Part 2 of the

Waste Data Study. This takes into account population/economic growth, maximisation of recycling, net self sufficiency for LACW, C&I, and C&D waste by 2026 to give the quantity of waste to be manged for each waste stream to 2035. The actual quantities are identified in five yearly intervals from 2020 in Table 8 (to be renumbered as Table 5) which will be discussed later in this report.

92. **MM25** provides new paragraphs to explain and support Table 8 and is necessary for the Plan to be effective. It sets out that whilst some of North London's Waste will still be exported to landfill, the aim of the Plan is to deliver the equivalent capacity for LACW, C&I, C&D and hazardous waste within the Plan area with recovery and recycling playing the most substantial part.

93. **MM26** provides for revisions to Table 8 and identifies the amount of waste that needs to be managed over the Plan period for LACW, C&I, C&D, Excavation, Hazardous and Agricultural waste streams. It identifies the total waste arisings for each waste stream and the amount that will be required to be recycled, recovered (Energy from Waste), treatment and disposal to landfill in five yearly tranches from 2020 to 2035. The revisions to the table as a consequence of **MM26** are necessary for the Plan to be effective and consistent with national policy as they clearly identify the amounts of waste in each stream that the Plan needs to cater for over the Plan period and the necessary waste management method.

94. Revisions to paragraph 5.5 of the Plan, which will be moved to appear after Table 8, provide introductory text to the existing capacity of North London's waste management facilities by type of facility and waste stream managed as at 2016. These are provided by **MM27** which is necessary for the Plan to be justified. The MM identifies a capacity of just over one million tonnes per annum of recycling/composting for LACW and C&I waste, just under 600,000 tonnes per annum of energy recovery for LACW, around 630,000 tonnes per annum of recycling and treatment for CD&E waste, and around 4,250 tonnes per annum of hazardous waste capacity.

95. **MM28** provides for revisions to existing Table 3 of the Plan (to be renumbered Table 6) that shows the detailed figures, in tonnes per annum, of capacity for each waste stream and the type of facility that this capacity relates to. This MM is necessary for the Plan to be effective.

96. The London Plan defines the technologies and processes which constitute 'managing' waste. **MM29** introduces new text to existing paragraph 5.6, which will be moved after the new Table 6, which identifies that these definitions have been applied to North London's facilities when calculating capacity. It identifies that transfer stations are not included except where they undertake recycling and this element only has been added to the total capacity identified in the

revised Table 3. This MM is necessary for the Plan to be justified and effective.

97. There are some known changes that will occur to some facilities over the Plan period that will affect their waste management capacity. However, these are not clearly identified in the Plan. **MM30** provides for a new section ('Changes to Capacity over the Plan Period') and an introductory paragraph to explain that some facilities are known to be moving or closing and some new facilities are proposed to be built. This MM is necessary for the Plan to be justified.

98. Additional planned capacity will be provided at the Edmonton EcoPark for which a Development Consent Order (DCO) has been approved by the Secretary of State for a new Energy Recovery Facility (ERF) that will manage the treatment of residual waste during the Plan period and beyond. Whilst this is referred to in paragraphs 8.5 and 8.6 of the Plan, these paragraphs do not adequately identify the capacity that will be provided, or lost, by the additional new facility.

99. **MM31** and **MM32** therefore provide revisions to paragraphs 8.5 and 8.6 and are necessary for the Plan to be justified. **MM31** identifies that the current facility provides for just under 600,000 tonnes per annum capacity and that the new facility will increase this to approximately 700,000 tonnes per annum. The additional 100,000 tonnes per annum has been incorporated into the calculation of the 'capacity gap' which will be considered later in this report.

100. Paragraph 8.6 of the Plan identifies that the DCO for the Edmonton EcoPark provides for the loss of the existing composting plant to make way for the additional ERF facility. **MM32** proposes additional text to this paragraph that states that it is not intended to build a replacement composting facility and that this will result in a capacity loss of around 35,200 tonnes per annum which has been built into the capacity gap calculation. Whilst this represents a loss of a facility, compensatory provision is not required as the wider Edmonton EcoPark is not being developed for non-waste management uses and therefore there is no conflict with Policy 1 of the Plan.

101. The Plan also refers to the Powerday facility in Enfield which is an existing site currently operating as a Waste Transfer Station. Planning permission has been granted for this site to be used as a Materials Recovery Facility capable of handling 300,000 tonnes of C&I and C&D waste per annum. **MM33** proposes additional text to paragraph 8.10 of the Plan that identifies that it is not clear if the planning permission will be implemented and therefore this has not been added to the pipeline capacity figures in identifying the capacity gap. This MM is necessary for the Plan to be justified.

102. Paragraphs 8.11 and 8.12 of the Plan relate to the loss and re-provision of existing waste management facilities. These identify the London Plan

requirement for compensatory capacity to be provided where existing waste management sites need to be redeveloped by non-waste management related uses.

103. It is known that some sites within the Plan area are to be subject to redevelopment but the Plan is not clear or specific regarding which facilities these may be or the effect this may have on future capacity. **MM34** provides for revisions to paragraph 8.11 that identifies that some sites will be redeveloped for other non-waste management uses as part of the Brent Cross Cricklewood Regeneration Scheme and the detailed information on this is set out in Schedule 1 of the Plan. This MM is necessary for the Plan to be justified.

104. **MM35** provides for revisions to paragraph 8.12 that identifies that the regeneration area includes four existing waste management sites. These are Site Reference BAR3 – PB Donoghue, BAR4 – Hendon Transfer Rail Station, BAR6 - McGovern and BAR7 – Cripps Skips. The MM identifies that the Hendon Rail Transfer Station will be replaced by a new facility and that planning permission has been granted for a new waste transfer facility at Geron Way.

105. The conflict between some of the above existing waste sites and the effect the use has on the living conditions of nearby residents is recognised but is not a matter that can be addressed in the Plan. However, **MM35** identifies that the existing facilities at BAR6 and BAR7 fall within the area of land required to deliver the early phase of the regeneration scheme for which work has commenced. BAR3 is identified as for closure as part of phase 4. The capacity at sites BAR4, BAR6 and BAR7 and part of the capacity of BAR3 would be replaced by the new waste transfer facility.

106. **MM35** also identifies that the remaining capacity from site BAR3 will need to be identified prior to its redevelopment. As such, the Plan assumes that there will be no loss of capacity as a consequence of the redevelopment of these facilities.

107. A new paragraph is proposed by **MM36** which identifies that two facilities in Waltham Forest have recently closed and their capacity has been replaced by a new facility in Enfield. Consequently, there has been no loss of capacity within the Plan area as a consequence of the site closure. **MM35** and **MM36** are necessary for the Plan to be justified.

108. Part 2 of the Waste Data Study (CD1/7), updated by the Data Study Addendum (CD1/23), provide the evidence base that supports the calculation of the 'capacity gap' for the LACW/C&I, C&D and Hazardous waste streams. The capacity gap for these waste streams is introduced in paragraph 6.7 of the Plan. However, this paragraph does not explain how the capacity gap has been calculated.

109. Whilst the Plan refers to the 'capacity gap', it does not adequately explain what this term means. **MM37** provides amendments to paragraph 6.7 to explain that the capacity gap is the difference between the projected waste arisings and the existing capacity taking into account known changes to capacity over the Plan period. This MM also sets out that additional waste management capacity required will be for recycling and recovery in accordance with Strategic Objective 1 of the Plan. This MM is necessary for the Plan to be justified.

110. **MM38** provides for revisions to Table 6 of the Plan (to be renumbered as Table 7) that reflect the evidence in the Data Study Addendum and numerically sets out the capacity gap for the waste streams above in tonnes over five yearly intervals from 2020 to 2035. This table demonstrates that without additional sites or the expansion of existing facilities there will be a capacity gap for LACW/C&I and Hazardous waste streams throughout the Plan period. It also demonstrates that there will be a surplus in capacity for the management of C&D waste throughout the Plan period.

111. A new paragraph is provided by **MM39** which explains that to meet the identified capacity gaps identified in the Table, the approach will be to seek opportunities for new capacity through the intensification of existing sites and/or new facilities. **MM37**, **MM38** and **MM39** are necessary for the Plan to be effective.

112. In order to determine how much land is needed to be identified for waste management facilities to meet the capacity gap, paragraph 6.8 of the Plan sets out that the capacity gap has been converted into a land area requirement based on a typical throughput per hectare for various types of facilities. However, this paragraph does not adequately explain the evidence base which has been used to enable the land area required to be calculated.

113. **MM40** provides amendments to paragraph 6.8 to explain that Table 20 in section 7 of the Waste Data Study Part 2 (CD1/7) provides the evidence base that supports the calculation of the land required. This MM also explains that new technologies may be introduced during the Plan period that may enable some sites to have a higher throughput per hectare. Consequently, monitoring of site capacity, which will be discussed later in this report, will enable the land required to be reviewed. In addition, the MM also sets out that in order for net self-sufficiency to be achieved by 2026, in line with the London Plan, new capacity will need to be delivered by this date.

114. A new table showing the assumed tonnages per hectare that have been used to calculate the land take requirements for various recycling, energy from waste, re-use and composting facilities is provided by **MM41**. Revisions to Table 7 of the Plan (to be renumbered as Table 9) and the supporting text are provided by **MM42** and **MM43** respectively. These identify the indicative land take requirements to meet the

identified capacity gap and that by 2026 an additional 1.5 hectares of land for the recycling of LACW/C&I waste and 4.9 hectares of land required for recycling/recovery/treatment of Hazardous waste will be required in the Plan area. Therefore, a total of 6.4 hectares of land for waste management uses will be required in the Plan area. These MMs (**MM40** to **MM43** inclusive) are necessary for the Plan to be effective.

Conclusion on Issue 3

115. I am satisfied that the Plan, when considered with the recommended MMs, provides an appropriate and robust basis to identify the waste that needs to be managed in the Plan area and over the Plan period and is fully justified by the evidence and is sound.

Issue 4 – Whether the selection process to identify areas to manage the identified waste needs over the Plan period is clear, robust and justified.

116. Sections 3 to 6 of the NPPW set out the approach that Local Plans should take to identify future waste requirements over the Plan period. Paragraph 4 of the NPPW sets out criteria for identifying suitable sites and areas for waste management facilities. They include the consideration of a broad range of locations including industrial sites, opportunities to co-locate waste management facilities and giving priority to re-using previously developed land and sites identified for employment purposes.

117. The London Plan (Policy SI 8) requires Development Plans to plan for identified waste needs and "allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide capacity to manage the apportioned tonnages of waste". The London Plan also identifies existing waste sites, Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS) as a focus for new waste capacity.

118. The current Section 8 of the Plan (which will be swapped to precede Section 7) sets out the approach taken to identify sites/areas needed to meet the waste needs and capacity gap. It refers to the methodology assessment criteria that has been used in the Sites and Areas Report (CD1/9) to inform the identification of individual sites/areas that are suitable for future waste management use.

119. The introductory paragraphs to Section 8 do not adequately describe the policy context briefly described above that is provided in the NPPW and the London Plan that has influenced the approach to the identification of suitable sites and areas for waste management facilities. It is also not clear how the requirements of Strategic Objective 2 of the Plan, which requires that sufficient land is available to meet North London's waste management needs, is to be delivered.

MM44 provides additional text to explain these matters and is necessary for the Plan to be effective.

120. During the 'call for sites' exercise only one site was put forward by landowners as being possibly suitable for waste management uses. As a result, the Plan proposes an 'area' approach to the identification of potential locations for waste management uses. Whilst the Plan refers to new future areas for waste management it does not adequately explain these. **MM45** provides amendments to paragraph 8.2 of the Plan. This explains that an 'area' comprises a number of individual plots of land, such as an industrial estate or employment area that is in principle suitable for waste use but where land is not specifically safeguarded for such use. This MM is necessary for the Plan to be effective.

121. Although Policy SI 8 of the London Plan identifies that SIL/LSIS are suitable locations for waste management, the assessment criteria adopted in the Plan has sought to refine this approach in the Sites and Areas Report by the application of an assessment methodology to locational areas that are the most suitable for waste management use in the Plan area. These are identified as 'Priority Areas'. However, paragraph 8.2, which introduces the area search criteria, does not provide any explanation of what is meant by a 'Priority Area'. **MM46** addresses this matter and is necessary for effectiveness.

122. The Sites and Areas Report (CD1/9) identifies areas potentially suitable for waste management use. The methodology for identifying new areas is broadly supported by technical consultees and the waste management industry. However, the Sites and Areas Report does not adequately identify how the best performing areas and existing industrial areas should be identified as the focus for new waste facilities or how a wider geographical distribution of facilities should be sought.

123. The Draft Plan initially identified that approximately 352 hectares of land within the Plan area was suitable for waste management uses. An 'Options Appraisal for Sites and Areas' informed the identification of the most appropriate sites and areas shown in the Publication Plan. This resulted in a reduction in the area of land within the Plan area that could be potentially suitable for waste management uses to approximately 102 hectares. However, despite this latter figure being used in the Plan, the 'Options Appraisal for Sites and Areas' document was not published nor are its outputs adequately reflected in the Plan. Consequently, the issue arises whether the Plan provides a robust rationale that clearly demonstrates why 102 hectares of land is identified as being deemed suitable for waste management uses compared with an identified need of just 6.4 hectares.

124. The 'Options Appraisal for Sites and Areas' was updated in 2020 (CD1/24). **MM47** explains that this has been used to inform the areas

that have been identified in the Plan as being suitable for waste management uses. This MM is necessary for the Plan to be justified.

125. Table 10 of the Plan identifies the assessment criteria that was used in the Sites and Areas Report to identify areas potentially suitable for waste management use. However, this is based predominantly on the 2015 version of the Sites and Areas Report and does not identify the further refinement that was applied through the 2019 version and by the Options Appraisal for Sites and Areas. **MM48** provides amendments to paragraph 8.24 of the Plan to explain that further work was undertaken, including re-appraisal of areas, impacts and the geographical location of sites.

126. I have carefully considered the concerns that this later re-appraisal work should be discounted as it was not wholly available at the submission stage. Nonetheless, the additional work and re-appraisal exercise that was undertaken after the examination hearings was in response to matters raised in those hearings and was made publicly available. It reflects the outputs from the Data Study Addendum and informs the relevant subsequent MMs. There is nothing unusual in this approach or the sequence of events. Overall, I find that the methodology used to evaluate the areas is sound.

127. Additional new paragraphs and amendments to paragraph 8.25 are provided by **MM49**, **MM50** and **MM51**. These further explain the assessment criteria and that the Options Appraisal for Sites and Areas considered five different options to evaluate the location and area of land required for waste management uses in the Plan area over the Plan period. The options include and exclude areas based on their performance against qualitative assessment criteria, detailed in the Sites and Areas Report.

128. The preferred option used in the Plan is Option 5. This identifies that areas with 'Band B' sites (Site is suitable for waste uses following appropriate mitigation), SIL and LSIS areas with a cap on land in Enfield. This option identifies only one industrial area in Enfield as being suitable for waste management uses and provides a more appropriate geographical spread of sites across the Plan area.

129. Overall, I find that the methodology used to identify the preferred option and the approach taken to evaluate the most appropriate locations for waste management development to be sound. However, none of the options considered resulted in a reduction of the total land area required in the Plan for potential waste management uses to be less than the 102 hectares identified.

130. The justification for such a large area being identified in the Plan, against an identified requirement of just 6.4, is also provided by **MM51**. This explains the strong competition for the use of any vacant industrial land in North London which already has low vacancy rates

(4.8%) and that the Sites and Areas Report analyses churn and vacancy rates in detail. Taking into account this analysis, the Plan identifies that 20% (20.5ha) of the allocated land could become available over the Plan period as a result of business churn.

131. Given the competition for industrial land in the London market, the absence of sites coming forward in the call for sites exercise, the low vacancy rates and the identified rate of churn, the approach adopted in the Plan to identify more land than is required to meet the waste needs of North London over the Plan period is justified. I find that this aspect of the Plan's approach provides flexibility over the Plan period and recognises the competitive nature of land use economics in North London. Identifying a range of land suitable for new waste facilities is a reasonable way of creating "sufficient opportunities to meet the identified needs of their area" as required by the NPPW.

132. **MM51** also recognises that there is a risk that the identified area in Enfield, comprising 26ha, could accommodate all new waste capacity that is required over the Plan period. Furthermore, the possibility that planning applications for new waste management facilities on other industrial land in Enfield, cannot be ruled out. Both of these scenarios would be contrary to Spatial Principle B of the Plan.

133. In response to the above, **MM51** explains that the Plan promotes a 'Priority Areas' sequential approach to ensure that waste management proposals demonstrate that consideration has been given to siting a facility within the areas set out in Schedules 2 and 3 of the Plan before other locations. This approach is set out in Policies 2 and 3 of the Plan, which are considered later in this report, and which also require that Priority Areas outside of Enfield should be considered first before a new waste site in Enfield is proposed.

134. These MMs (**MM48** to **MM51** inclusive) are necessary for the Plan to be justified and effective.

135. The Plan identifies thirteen Priority Areas to provide land suitable for the development of waste management facilities. Each Priority Area comprises an industrial estate or employment area that is in principle suitable for waste uses, subject to detailed assessment at the planning application stage.

136. Area profiles for each of the Priority Areas are provided in Appendix 2 of the Plan. These provide an indication of the types of facilities likely to be acceptable and could be accommodated on the Priority Area, identify planning and land use constraints and any mitigation measures that may be required.

137. Paragraph 8.26 identifies that the Priority Areas identified in Schedules 2 and 3 of the Plan are those which meet the selection criteria, as discussed above, and comply with the spatial principles of the Plan.

MM52 provides additional text to paragraph 8.26 to explain that in order to ensure that Priority Areas are the focus of new waste capacity, the location of new facilities will be monitored through Monitoring Indicator IN3. **MM53** provides for an updated Figure 13, to be renumbered Figure 11, that comprises a plan showing the locations of the Priority Areas for new waste management facilities. These MMs are necessary for the Plan to be effective.

138. The question arises whether the allocated area A22-HR (Friern Barnet Sewage Works/Pinkham Way) should be deleted as a Priority Area. I have carefully considered the written and oral evidence provided regarding this proposed allocation.

139. Priority Area A22-HR has a dual designation as Site of Importance for Nature Conservation (SINC) and Local Employment Area (LEA) in the Haringey Local Plan Strategic Policies (2013) and is protected for employment use, subject to consistency with its nature conservation status. Where a site has more than one designation, the Local Plan Strategic Policies document identifies that appropriate mitigation measures must be taken and where practicable and reasonable, additional nature conservation space must be provided.

140. Notwithstanding the evidence provided with regard to previous local plan examinations in Haringey, the dual designation of Priority Area A22-HR is a matter of fact and it is not the purpose of the North London Waste Plan Examination to determine if both, or either, of these designations should continue to apply. The consideration is whether the evidence justifies, or otherwise, its identification as a Priority Area in the Plan and that the Plan is sound in this regard.

141. Appendix 2 of the Plan, which is considered later in this report, clearly identifies the planning constraints applicable to the area and sets out the need for ecological/nature conservation mitigation and enhancement to be considered as part of any development proposals.

142. The question also arises whether the evidence has appropriately considered the flood risk issues that are relevant to the site. In this regard, I have carefully considered the Flood Risk Sequential Test and Report (CD1/11 and CD1/19), the Flood Risk Addendum (CD1/11/Add) and the Sustainability Appraisal Addendum and update (CD1/2/Add and CD1/2/Add-MM). Taking into account **MM113**, which is considered later in this report, I am satisfied that these documents collectively provide sufficient evidence to confirm that the Plan's approach to the consideration of flood risk in respect of site A22-HR is sound. I am also satisfied that appropriate engagement has taken place with the Environment Agency to inform the flood risk evidence.

143. The above documents indicate that of the 5.95ha comprising the Priority Area (which includes land owned by both the North London Waste Authority and Barnet Council), approximately 76.3% is shown to

be within Flood Zone 1, approximately 11.6% within Flood Zone 2 and approximately 12.1% within Flood Zone 3a. The eventual, if any, location of new waste development would be assessed against the flood risk criteria of the NPPF with the objective of avoiding development on land that is at risk of flooding by directing development away from areas of high risk (whether existing or future). In this regard a site-specific flood risk assessment would be required for any waste management development on this area.

144. Notwithstanding the former land uses on the area, a considerable part has revegetated over time. The question arises whether Priority Area A22-HR should be identified as previously developed land or whether it has revegetated to the extent that the remains of the former activities and structures have blended into the landscape to become part of the natural surroundings. Whilst the Plan recognises the current revegetated condition of the site it understandably does not provide any conclusion on the extent to which it may, or may not, have blended into the landscape, or indeed will do so overtime.

145. It is not necessary for Priority Areas to comprise previously developed land. Consequently, I do not consider it necessary for the purposes of soundness to firmly conclude the extent to which the site may or may not be considered as previously developed land. However, this is a matter that may be relevant in the consideration of any subsequent planning application for future waste management development.

146. Overall, I am satisfied that the site selection process is sound with regard to the identification of Priority Areas and that the relevant constraints for the areas identified have been appropriately considered and taken into account.

Conclusion on issue 4

147. I am satisfied that the Plan demonstrates, when considered with the recommended MMs, that the selection process to identify areas to manage the identified waste needs over the Plan period is clear, robust and justified by the evidence and is sound in this respect.

Issue 5 – Whether the Plan makes appropriate provision for the future management of waste.

148. Section 6 of the Plan sets out the future waste management requirements and Section 8 (to be moved and renumbered Section 7) sets out the selection process to identify Priority Areas required to manage the identified waste needs over the Plan period. The current Section 7 of the Plan (to be moved and renumbered Section 8) brings this information together to explain how North London's waste needs are intended to be managed over the Plan period. It identifies the waste management processes to be used for each waste stream.

149. This Section sets out an 'Over-arching Policy for North London's Waste' which reflects the achievement of net self-sufficiency for LACW, C&I, C&D and Hazardous waste streams by 2026. It sets out the need for excavation waste to be put to beneficial use and the encouragement of development on existing sites and in Priority Areas that promote the management of waste up the hierarchy, reflect the proximity principle by increasing the management of waste as close to the source as practicable and reducing exports to landfill.

150. Paragraph 7.2 provides supporting text to the over-arching policy. **MM54** provides additional text to this paragraph to explain that most capacity will be met through existing facilities and that Policy 1 of the Plan supports the intensification of existing sites whilst also enabling relocation to more sustainable locations for replacement capacity subject to assessment as required by Policy 5.

151. Paragraph 7.4 refers to the monitoring of the projected quantities of waste to ensure that the over-arching policy is being delivered. **MM55** provides additional text to explain there are four particular monitoring indicators in the Plan to assess this. These are outlined as being IN1 which monitors waste arising compared with the projected quantities; IN2 which monitors new waste management capacity delivered; IN3 monitors the location of new waste facilities and compensatory provision; IN7 monitors the amount of waste exported from the Plan area.

152. These MMs provide amendments to the supporting text of the over-arching policy and are necessary to ensure that the Plan is effective.

LACW and C&I waste

153. Paragraph 7.8 introduces the Plan's approach to the management of LACW and C&I waste. **MM56** provides amendments to this paragraph to explain that these waste streams comprise similar types of waste and that most of the facilities that manage these waste streams do not differentiate between these waste types. Consequently, the Plan groups the management of these waste streams together when assessing existing capacity and planning for additional capacity.

154. **MM57** provides new text to explain that there is a capacity gap of approximately 174,500 tonnes for LACW and C&I waste over the Plan period which equates to a requirement for 1.5 hectares of land, subject to the technology that facilities may use in the future. **MM56** and **MM57** are necessary for the Plan to be justified.

155. The Plan sets out the approach to the recycling/composting of LACW and C&I waste in paragraphs 7.9 to 7.11. **MM58**, **MM59** and **MM60** provide amendments and new text to these paragraphs. These amendments explain the role of the NLWA in preparing a Joint Waste Strategy (JWS). A key element of the most recent JWS, which expired

in December 2020, has been met through the granting of consent under the Development Consent Order (DCO) process for a replacement energy recovery facility at the Edmonton EcoPark to treat residual waste. The new JWS will be developed in 2021/22 and will set out how North London will contribute to the Mayor's recycling targets.

156. The new text in **MM60** explains that there is an opportunity to bring forward new waste recycling/composting capacity on the part of site A22-HR (Friern Barnet / Pinkham Way site) which is owned by the NLWA. There is also opportunity to bring forward commercial recycling in all but one of the Priority Areas identified in Schedule 2 and 3 of the Plan and composting capacity on four of the Priority Areas. **MM58**, **MM59**, **MM60** and **MM61** are necessary for the Plan to be effective.

157. Paragraph 7.14 is one of a number of paragraphs that explains the Plan's approach to the recovery of LACW and C&I waste. Amendments to this paragraph and the inclusion of a new paragraph are provided by **MM61** and **MM62**. The amendment to paragraph 7.14 deletes reference to additional land being required for the recovery of C&I waste as after 2025 the recovery element of this waste stream can be met by the new Edmonton Energy Recovery Facility. However, notwithstanding this, the new paragraph explains that there are opportunities for additional recovery capacity to be brought forward on three of the proposed Priority Areas. **MM61** and **MM62** are necessary for the Plan to be justified and effective.

CD&E waste

158. The approach to the recycling of CD&E waste is set out in paragraphs 7.19 and 7.20. **MM63** and **MM64** are necessary for the Plan to be justified and provide amendments to these paragraphs. These explain that North London has sufficient capacity over the Plan period to manage construction and demolition waste but some exports of excavation waste will continue. Monitoring Indicator IN1 will provide the annual monitoring of recycling rates for these waste streams.

159. Paragraph 7.23 explains that the Plan depends on landfill capacity being available outside of the Plan area over the Plan period. However, **MM65** is necessary for the Plan to be justified and provides amended text to explain that the majority of C&D waste (95%) will be reused, recycled and recovered and that the majority of excavation waste (95%) will be put to beneficial use.

Hazardous Waste

160. Paragraphs 7.26 and 7.27 set the Plan's approach to the recycling and recovery of hazardous waste. **MM66** and **MM67** provide amendments to these paragraphs to reflect the fact that there are a number of facilities in the Plan area that manage this waste with the majority being car breakers and metal recovery facilities. However, the capacity

for the management of hazardous waste is 49,000 tonnes per annum which requires approximately 4.9 hectares of land. New facilities, in principle, are supported in the Priority Areas. The Area Profiles in Appendix 2 of the Plan identify where a Priority Area is not suitable for hazardous waste and recycling and recovery activities. These MMs are necessary for the Plan to be justified and effective.

Conclusion on Issue 5

161. I am satisfied that the Plan demonstrates, when considered with the recommended MMs, that appropriate provision is made for the future management of waste in the Plan area over the Plan period and that it is sound in this respect.

Issue 6 - Whether the Plan's policies make appropriate provision for waste management development over the Plan period and provide an adequate balanced approach to protect people and the environment whilst delivering the Plan's aims and strategic objectives.

162. Section 9 sets out the Plan's policies to deliver the aims and strategic objectives, spatial principles and the overarching policy for waste management in the Plan area.

Policy 1: Existing Waste Management Sites

163. The existing waste management sites by site name are identified in Schedule 1 of the Plan. Policy 1 seeks to safeguard these, and any other sites that are granted planning permission, for waste uses. The policy supports the expansion or intensification of operations on existing waste sites. The policy sets out that non-waste uses on these safeguarded sites will only be permitted where it is clearly demonstrated that compensatory capacity can be provided. However, it does not identify how this is to be achieved or that such compensatory provision should also accord with the spatial principles of the Plan.

164. Whilst Schedule 1 identifies the site name of existing sites it provides no information on the site address, details of the waste streams that are managed or information on the annual tonnage of waste managed by the individual sites shown in the schedule. **MM105a** provides for this additional information to be provided in Schedule 1 and is necessary for the Plan to be justified.

165. **MM105b** provides for a change to the site area identified to be safeguarded on the Haringey Policies Map for site HAR 7 of Schedule 1. This corrects a mapping error and is necessary for the Plan to be effective.

166. The policy also refers to the 'agent of change principle' in respect of new non-waste development that may prejudice the use of a waste

site. It applies this principle to the Priority Areas allocated for waste management, as well as existing sites. The effect of applying this principle to allocated areas could significantly prejudice the delivery of non-waste management development on sites in proximity to the 109 hectares of land identified as Priority Areas, particularly as less than 10% of this area is likely to be developed for waste management uses. **MM68** addresses these matters and is necessary for the Plan to be effective. Amongst other things, the MM makes it clear that consideration of the agent of change principle only applies to existing sites.

167. Paragraphs 9.4 to 9.10 provide the supporting text to Policy 1. However, these paragraphs do not adequately explain that safeguarding of an existing waste site for waste use does not preclude changes of ownership or that planning applications for the intensification or expansion of operations will be permitted providing they align with other policies in the development plan.

168. In addition, the supporting text does not adequately explain that compensatory capacity must be above or at the same level of the waste hierarchy and at least meet the maximum achievable throughput of the existing site by reference to the throughput achieved over the last five years. Also, the text does not adequately explain that compensatory provision should also accord with the Plan's spatial principles and should be provided within the Plan area, unless the Plan's Annual Monitoring Report clearly demonstrates that remaining capacity is sufficient to meet net self-sufficiency for LACW, C&I, C&D and hazardous wastes. **MM69**, **MM70**, **MM71**, **MM72** and **MM73** address these matters and are necessary for the Plan to be effective.

169. Paragraph 9.10 provides further supporting text to explain the agent of change principle. However, it does not adequately explain the responsibilities placed on new development with regard to the mitigation of the impacts that may arise from locating new development in the proximity of an existing waste site. **MM74** addresses this matter and is necessary for the Plan to be effective.

170. In considering the impacts from waste management activities, the Plan does not explain the relationship between the planning policy considerations of the Plan and the Environmental Permitting Regulations. **MM75** addresses this matter in the interests of effectiveness and provides additional supporting text to Policy 1.

Policy 2: Priority Areas for new waste management facilities

171. This policy sets out the Plan's support for new waste management facilities but refers to these as being locations as opposed to 'Priority Areas'. The policy does not adequately reflect Spatial Principle B which seeks a better geographical location of sites. In addition, for consistency and effectiveness, it should reflect the modifications

provided by **MM8** requiring that new sites should be in Priority Areas outside of Enfield and that development proposals will need to demonstrate that no other sites are available before considering sites within Enfield's Priority Area. Furthermore, the Policy does not provide support for the co-location of complementary activities as required by spatial principle C. **MM76** addresses these matters and is necessary for the Plan to be positively prepared and effective.

172. Tables 11 and 12 identify the Schedule 2 and Schedule 3 areas respectively to which Policy 2 relates. Schedule 3 areas are those located within the LLDC area which are to be identified in the LLDC Local Plan and for which LLDC will be the relevant waste planning authority for the determination of planning applications on those areas. However, Tables 11 and 12 do not refer to the areas identified as being 'Priority Areas' to which the modified Policy 2 relates. **MM77** addresses this matter and is necessary for the Plan to be effective.

173. Paragraph 9.11 of the Plan provides part of the supporting text to Policy 2. However, it does not adequately explain how the Priority Areas identified meet the Strategic Objectives and Spatial Principles of the Plan. In addition, the text does not explain that the sequential Priority Area approach applies to additional capacity in Enfield only and not to the expansion or intensification of existing waste sites or providing compensatory capacity for sites already in the Borough. Furthermore, it does not explain that there is an exception to the sequential Priority Area approach in Enfield where proposals are for Recycling and Reuse Centres (RRCs) as there is an identified need in Enfield and Barnet to improve coverage across North London. **MM78** addresses these matters and is necessary for the Plan to be effective.

174. Paragraphs 9.13 to 9.16 also provide supporting text to Policy 2. However, these do not adequately explain that the Priority Areas will be identified as the most suitable locations for waste uses in the relevant Borough Council Policies Maps. In addition, this supporting text does not explain how the Priority Areas identified meet Strategic Objectives 1 and 5 and that for each area there is an 'Area Profile' in Appendix 2 of the Plan which indicates the constraints that may be applicable in considering development proposals within such areas. Furthermore, the text does not explain that the Priority Areas are also suitable to consider for compensatory capacity. **MM79**, **MM80**, **MM81** and **MM82** provide the necessary modifications in order for the Plan to be effective.

Policy 3: Windfall Sites

175. This policy provides support for waste management development on windfall sites. However, it does not adequately explain that the policy relates to development proposals on sites that are located outside of the existing sites, identified in Schedule 1, or outside of Priority Areas as identified in Schedules 2 and 3. Furthermore, it does not adequately

reflect Spatial Principle B and fails to identify that sites outside of Enfield should be considered first. **MM83** addresses these matters and is necessary for the Plan to be effective.

176. Corresponding changes to the supporting text of Policy 2 in paragraphs 9.23 and 9.24 are necessary to reflect the changes made to the policy but to also explain that the exception to this is for development proposals for RRCs in Enfield and Barnet. This is necessary improve the geographical coverage of RRCs across North London. These are provided by **MM84** and **MM85** which are necessary for the Plan to be effective.

Policy 4: Re-use & Recycling Centres (RRCs)

177. This policy provides support for RRCs across the Plan area but does not identify the fact that these are particularly needed in Enfield and Barnet in order to improve the coverage across the Plan area. **MM86** provides the modification to address this matter and is necessary for the Plan to be effective.

178. Paragraph 9.33 provides part of the supporting text to Policy 4 and identifies that existing Sites and the Priority Areas identified in Schedules 1, 2 and 3 are likely to be the most suitable for RRCs. However, the paragraph does not explain the relationship with Policy 3 and how this policy will apply to a proposal for a RRC outside of these areas. **MM87** provides the text to address this matter and is necessary for the Plan to be effective.

Policy 5: Assessment Criteria for waste management facilities and related development

179. This policy sets out the environmental and amenity matters that will need to be addressed in the submission of planning applications for waste management development. However, the policy fails to recognise the need for the efficient use of urban land in North London and as such does not identify that proposals should maximise the waste capacity of the site. In addition, the policy is unduly restrictive in requiring all facilities to be enclosed which is unnecessary if an equivalent level of amenity or environmental protection can be permanently achieved by other means.

180. The protection afforded to heritage assets in the policy by seeking to avoid significant adverse impact is inconsistent with the advice provided in Section 16 of the Framework. Furthermore, the policy does not require any consideration of the effect of development proposals on the mitigation or adaption to climate change. **MM88** addresses these matters and is necessary for the Plan to be effective and consistent with national policy.

181. Part of the supporting text to the policy is provided by paragraphs 9.34, 9.37, 9.40 and 9.41. **MM89**, **MM91**, **MM92** and **MM93** are necessary to the supporting text of these paragraphs respectively to reflect the modifications made to the policy by virtue of **MM88.** Additional text is also necessary to reflect the fact that Policy SI 8 of the London Plan also promotes capacity increases at waste sites to maximise their use to demonstrate that London's land is being used to its highest potential. Consequently, **MM90** explains that applications for waste management development will be required to demonstrate that the waste management capacity on a site has been optimised. These MMs are necessary for the Plan to be effective and in general conformity with the London Plan.

182. The supporting text provided in paragraph 9.42 refers to the need for development proposals to be accompanied by a transport 'Servicing and Delivery Plan' and a 'Construction Logistics Plan' and that consideration should be given to the use of Direct Vision Lorries for all waste vehicles. However, the text does not recognise the relationship with these requirements and the Mayor's 'Vision Zero Action Plan' nor does it refer to the need to give consideration to efficient and sustainable transport movements. **MM94** addresses these matters and is necessary for the Plan to be effective.

183. Criterion (i) of Policy 5 (to be renumbered as criterion 'j') relates to the protection and enhancement of biodiversity. Paragraph 9.44 provides supporting text to explain how this aspect of the policy should be taken into account in the submission of development proposals. However, it does not identify that Borough Council Local Plans also contain detailed local policies relating to biodiversity which, in addition to the advice provided in the Framework, will also need to be taken into account. **MM95** provides modifications to this supporting text and is necessary for effectiveness.

184. Criterion 'k' of the policy (to be renumbered 'l') requires that development should have no adverse impact on flood risk on and off the site. Supporting text to this criterion is provided by paragraph 9.48. However, the paragraph does not adequately explain that development proposals will be required to consider the impact of climate change using the latest published climate change allowances and that a sequential approach to the layout of the site should be adopted to locate development in those parts of a site that is at a lower risk of flooding. **MM96** is necessary to address this matter and is necessary for the Plan to be effective.

Policy 6: Energy Recovery and Decentralised Energy

185. This policy requires that where waste cannot be managed at a higher level in the waste hierarchy it should be used to generate energy, recover excess heat and to provide supply to networks including decentralised energy networks. However, the policy fails to adequately

recognise that this may not always be technically feasible or financially viable to do so. **MM97** provides modifications to the policy to require proposals to demonstrate how they meet, or do not meet, the requirements of the policy through the submission of an Energy Statement. This MM is necessary for the Plan to be effective.

186. Part of the supporting text to Policy 6 is provided by paragraph 9.61. This identifies that work is underway to progress the delivery of the Meridian Water decentralised network in the Lee Valley and that this will connect with other heat sources from waste developments in the Lee Valley including the Edmonton EcoPark. However, the text does not recognise the occurrence of Green Belt in proximity to the Lee Valley. **MM98** is therefore necessary for the Plan to be effective and consistent with national policy to ensure that the openness and permanence of the Green Belt is maintained.

Policy 7: Waste Water Treatment Works and Sewage Plant

187. This policy, amongst other things, identifies that proposals for waste water treatment and sewage plant should meet environmental standards set by the Environment Agency. However, this aspect of the policy is not related to land use planning nor is its compliance in the control of the relevant waste planning authority. Therefore, this part of the policy is inappropriate for inclusion within a development plan document. **MM99** provides for the deletion of this part of the policy and is necessary for the Plan to be consistent with national policy.

Policy 8: Inert Waste

188. This policy identifies the developments for which the use of inert waste will be permitted and includes the restoration of mineral workings and facilitating improvement in the quality of land. However, the policy fails to define these as beneficial uses and is partially inconsistent with the modifications provided by **MM21**. In addition, the policy does not identify the need to ensure that inert waste is also managed as far up the waste hierarchy as possible, including on-site recycling and use, and is therefore inconsistent with Strategic Objective 1 of the Plan. **MM100** provides modifications to the policy to address these matters and is necessary for the Plan to be effective.

189. Corresponding modifications to the supporting text in paragraph 9.68 as a consequence of **MM100** are necessary and are provided by **MM101.**

Conclusion on Issue 6

190. Subject to the recommended MMs, I am satisfied that Plan's policies make appropriate provision for waste management development over the Plan period and provide an adequate balanced approach to protect people and the environment whilst delivering the Plan's aims and

strategic objectives. Accordingly, with those MMs in place, I find this part of the Plan to be sound.

Issue 7 - Whether the monitoring and implementation framework of the Plan will be effective.

191. Section 10 of the Plan comprises the monitoring framework that lists the key indicator targets, links with strategic aims and policies and progress towards the delivery of outcomes to monitor the effectiveness of the Plan. It also identifies in tabular form the roles and responsibilities for organisations that have an input into the implementation of the Plan.

192. Paragraph 10.3 identifies that the responsibility for monitoring the achievement of the aims and objectives of the Plan lies with the individual North London Borough Councils. However, the Borough Councils have agreed to monitor the Plan jointly through a lead Borough Agreement and a joint Annual Monitoring Report will be produced. **MM102** provides for these modifications to the Plan's monitoring arrangements in the interests of effectiveness.

193. As a consequence of the modifications made to the tables in Sections 5 and 6 of the Plan, corresponding changes are necessary to the monitoring indicators provided in Table 14. **MM103** provides the necessary modifications.

194. Table 15 of the Plan identifies the roles and responsibilities involved in implementing and monitoring the Plan. In order to be consistent with the modification provided by **MM103,** in respect of the appointment of a lead Borough Council to monitor the Plan, **MM104** is necessary for effectiveness.

Conclusion on Issue 7

195. Subject to the recommended MMs, the monitoring and implementation framework is effective and provides a robust framework for monitoring the delivery of the Plan and is sound.

Issue 8 – Whether the Area Profiles for the Priority Areas as set out in Appendix 2 of the Plan provide appropriate guidance for the submission of development proposals.

196. Appendix 2 to the Plan identifies the planning constraints, potential waste management uses and potential mitigation measures that need to be considered in any planning applications for waste management development proposals on the Schedule 2 and 3 Priority Areas identified in Table 11.

197. Modification is required to the 'Historic Environment' theme of Area A05 -BA (Connaught Business Centre) to identify that the Area is within

the Watling Street Archaeological Priority Area and there is a potential for archaeological remains to be found. Consequently, an archaeological assessment should be undertaken as part of any development proposal. This modification is provided by **MM106** and is necessary for the Plan to be effective and to ensure that the archaeological implications of waste management development within the allocated Priority Area are properly taken into account in accordance with national policy.

198. Similarly, modifications are required to the Historic Environment theme of Areas A12-EN (Eleys Estate, Enfield), Area A15-HC (Millfields LSIS) and A21-HR (North East Tottenham) to reflect the fact that these Areas are within the Lee Valley West Bank Archaeological Priority Area, (Area 12-EN) and Lee Valley Archaeological Priority Area (Areas A15-HC and A21-HR). As such, archaeological assessment should be undertaken as part of any development proposals. A further addition is also required to Area A15-HC to reflect the fact that the Hackney Borough Disinfecting Station, which is a Grade II listed building, is also shown on the Heritage at Risk Register. These modifications are provided by **MM107**, **MM108** and **MM112** and are necessary for the Plan to be effective.

199. **MM109** is necessary to modify the 'Flood Risk' theme for Area LLDC1-HC (Bartrip Street) to reflect the fact that the area is largely within Flood Zone 1 with the southernmost part falling partially within Flood Zones 2 and 3. However, the proposed waste use is considered to be 'Less Vulnerable' and the site has been subject to a Sequential Test in the Flood Risk Sequential Test Report (CD1/11) and found to be appropriate for waste management development. As such the exception test would not be applicable. This MM is necessary for the Plan to be effective.

200. Similarly, modifications are required to the Flood Risk theme for Areas LLDC2-HC (Chapman Close) and A19-HR9 (Brantwood Road) to identify that a site-specific flood risk assessment would be required for any waste management redevelopment which will need to incorporate the current climate change allowance at the time of submission. These modifications are provided by **MM110** and **MM111** and are necessary for the Plan to be effective.

201. Similar modifications are also required to the Historic Environment and Flood Risk Themes of Areas A24-WF (Argall Avenue) and LLDC3-WF (Temple Mill Lane) requiring archaeological assessment and site-specific flood assessment to be provided as part of a planning application. These are provided by **MM114** and **MM115** and are necessary for the Plan to be effective.

202. Modifications are necessary to the Area Profile of A22-HR Pinkham Way to reflect the relevant land use designations and policy implications of the development plan. Modifications are also necessary to the Flood

Risk theme to reflect the fact that a site-specific flood risk assessment would be required for any waste management redevelopment.

203. In addition, new text is required to the 'potential mitigation theme' to reflect the fact that the number of land use designations affecting the site mean that only a proportion of the site would be suitable for waste management development. The text identifies that a smaller part of the site is in the ownership of the NWLA and therefore most likely to accommodate waste management development and that the site footprint should be minimised. Any development on the site will need to consider the impacts on biodiversity and how public access to the remainder of the site can be achieved. These modifications are provided by **MM113** and are necessary for the Plan to be effective.

Conclusion on Issue 8

204. Subject to the recommended MMs, the Area Profiles, as set out in Appendix 2, provide appropriate guidance for the submission of development proposals for waste management uses on those areas.

Overall Conclusion and Recommendation

205. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

206. The North London Borough Councils have requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that the Duty to Cooperate has been met and that, with the recommended main modifications set out in the Schedule of Main Modifications, the North London Waste Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

Stephen Normington

INSPECTOR

This report is accompanied by an Appendix containing the Main Modifications.

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Appendix – Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and <u>underlining</u> and bold font for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM1	1	Paragraph 1.3 and 4.1 (part)	The Aim and **Strategic** Objectives: […] The Spatial **Principles** ~~Framework~~: The spatial principles flow from the ~~Plan's~~ **Strategic** Objectives **and provide the strategic direction for the detailed policies of the NLWP and inform site/area selection.** ~~This sets out~~ **They reflect** the physical and planning components that influence the Plan and **guide the** ~~identifies~~ **identification of** opportunities and constraints for waste planning in North London.
MM2	18	Paragraph 3.3	Aim of the NLWP "To achieve net self-sufficiency* for LACW, C&I and C&D waste streams, including hazardous waste, **seek beneficial use of excavation waste,** and support a greener London by providing a planning framework that contributes to an integrated approach to management of materials further up the waste hierarchy. The NLWP will provide sufficient land for the sustainable development of waste facilities that are of the right type, in the right place and provided at the right time to enable the North London Boroughs to meet their **identified** waste management needs throughout the plan period".

Ref	Page	Policy/ Paragraph	Main Modification
			* Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste generated in North London, while recognising that some imports and exports will continue. **Equivalent capacity will be measured by the amount (tonnes) managed for each waste stream against the projected waste arisings in Table 5.**
MM3	18	Paragraph 3.4	The **Strategic** Objectives **are the steps needed to achieve the Aim** of the ~~draft~~ NLWP. **They are delivered through the policies in the Plan and each Strategic Objective signposts the policy or policies through which it will be met. The Strategic Objectives** are as follows: […] SO3. To plan for net self-sufficiency in LACW, C&I, C&D waste streams, including hazardous waste, by providing opportunities to manage as much as practicable of North London's waste within the Plan area taking into account the amounts of waste apportioned to the Boroughs in the London Plan, and the requirements of the North London Waste Authority, **to seek beneficial use of excavation waste, and to monitor waste exports as part of the ongoing duty to co-operate**. Met through Policies 1, 2, 3, 4, and 8 [footnote] ~~Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste generated in North London, while recognising that some imports and exports will continue.~~
MM4	15	2.27 [Moved here after 2.25]	The North London Boroughs are all focused on the challenges posed by climate change. Borough strategies are driven by the requirements to mitigate and adapt to all effects of climate change. The NLWP aims to deliver effective waste and resource management which makes a positive and lasting contribution to sustainable development and to combating climate change. **In particular this includes reducing the reliance on disposal to landfill sites outside London, lowering emissions from road transport, ensuring new waste facilities generating energy meet**

Ref	Page	Policy/ Paragraph	Main Modification
			the Mayor's Carbon Intensity Floor, directing new development to the most appropriate sites and taking into account the greater occurrence of urban flood events.
MM5	20	4.2	The Spatial **Principles** ~~Framework~~ flow from the Plan's Strategic Objectives and provide~~s~~ the strategic direction for the detailed policies of the NLWP and informs site/area selection. **The principles take account of the spatial and wider policy context, the Plan's evidence base and the views of stakeholders.** The Spatial **Principles** ~~Framework~~ also guide~~s~~ the assessment of the suitability of windfall sites under Policy 3. ~~It~~ **They** reflect~~s~~ the complexities and realities of planning at a sub-regional level taking into account varied characteristics and functions across the seven boroughs, from densely populated urban areas to stretches of Green Belt. Competing and changing land uses, especially release of industrial land for housing, is a key issue for the boroughs.
MM6	22	4.11 (part)	The current and changing character of each borough's industrial land is a consideration in identifying locations for new waste infrastructure. Larger and co-located facilities are more suited to areas with similar existing uses away from sensitive receptors. A future waste industry focused on resource management may derive positive cumulative impacts from a concentration of facilities. Conversely, the urban environments of NLWP boroughs are restricted by severe physical constraints limiting opportunities for some types of waste facilities. In addition, ~~some areas, such as~~ **most waste facilities would be regarded as inappropriate development in** the protected Green Belt in the north, will be largely out of bounds for any built waste facilities **unless very special circumstances justifying the use of Green Belt land have been demonstrated.** As population and densities in the plan area increase with projected growth, fewer areas away from sensitive receptors will be available. Continued development of waste facilities in areas which have, and continue to provide, significant waste capacity could have wider implications on the regeneration of the local economy. When choosing locations for future development, the benefits of co-location will need to be balanced against the cumulative impacts which can arise from an accumulation of facilities in one location. Cumulative impacts can include traffic levels, noise and odours. There may be times when the cumulative impacts of several waste developments operating in an area would be considered unacceptable.

Ref	Page	Policy/ Paragraph	Main Modification
MM7	22	New after 4.11	**Figure 9 shows that there is a concentration of existing waste sites in the Lee Valley corridor, mainly in Enfield. Indeed, Enfield contributes 62% of the land currently in waste use in North London, compared to 18% in Barnet, 12% in Haringey and 5% or less in the remaining Boroughs. The NLWP has the opportunity to address concerns that there is an over-concentration of waste facilities in Enfield by promoting a better geographic spread of sites across North London and create a more sustainable pattern of waste development.**
MM8	22	4.12	**While all industrial land in North London is suitable 'in principle' for waste uses, there are certain locations which are more suitable than others to provide the waste capacity needed. Section 8 of the NLWP sets out how 'Priority Areas' for new waste facilities in North London were identified. One of the considerations was creating a better geographical spread, and this has been sought by limiting the number of Priority Areas within Enfield. The NLWP takes an area-based approach to waste planning and identifies certain industrial and employment areas as in principle more suitable for waste use but where the land is not specifically safeguarded for waste. The area-based approach allows for flexibility in bringing forward a range of locations across North London which is combined with policy to promote areas outside Enfield first (see Policy 2). This is supported by annual monitoring to check that land for waste capacity is being taken up as anticipated (see Chapter 10 monitoring indicator IN3). In addition, the NLWP supports the intensification of existing waste facilities where appropriate to optimise their throughput (see Policy 1).** [separate here to new para] ~~Policy 2 seeks to extend the existing spread of locations for waste facilities by identifying locations which are suitable for new waste facilities, taking into account~~ **In combination, existing waste sites and the 'Priority Areas' are considered a sustainable network of waste facilities because they present sufficient opportunity to meet North London's waste capacity needs and net self-sufficiency targets while promoting a better geographical spread.**

Ref	Page	Policy/ Paragraph	Main Modification
			They will help reduce movements of waste, including waste exports and increase opportunities for waste to be managed in proximity to its source. New waste facilities will be directed towards the most suitable land in North London when assessed against the planning criteria (see Table 10) as well as ~~factors such as~~ the character of different areas, changing land uses and availability of suitable industrial land. **Policy 2 identifies these Priority Areas in Schedules 2 and 3. Outside of the Priority Areas,** ~~W~~**w**here demand arises, opportunities to improve the spread of waste sites across the area are supported through Policy 3: Windfall Sites where they adhere to the site assessment criteria set out in section 8.
MM9	25	New after 4.17	**Co-location of facilities with complementary activities will be encouraged through Policy 2, which directs new waste uses to Priority Areas and provides a spatial focus towards land with similar existing uses away from sensitive receptors. Policy 3: Windfall Sites allows for opportunities of locating recycling facilities near to a reprocessing plant that could use the recyclate material. Policy 5 requires developers to consider the possible benefits of co-locating waste development as well as any potential cumulative impacts.**
MM10	27	4.18	The NPPW recognises the benefits of co-location of waste facilities with end users of their energy outputs. The London Plan ~~supports the development of combined heat and power systems and provision of heat and power to surrounding consumers~~ **Policy SI8 encourages proposals for materials and waste management sites where they contribute towards renewable energy generation and/or are linked to low emission combined heat and power and/or combined cooling heat and power (CHP is only acceptable where it will enable the delivery or extension of an area-wide heat network consistent with Policy SI3 Part D1e). The same policy requires** ~~expects~~ **facilities generating energy from waste to meet, or to demonstrate that steps are in place to meet in the near future, a minimum performance of 400g of CO2 equivalent per kilowatt hour of electricity produced.**
MM11	28	4.26	Road transport will continue to be the principal method of transporting waste in North London, particularly over shorter distances where this is more flexible and cost effective. **The efficient use of transport networks combined with good logistics and operational practices can**

<table>
<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td></td><td></td><td></td><td>make a significant contribution towards the level of transport sustainability achieved. The transportation of waste as well as other traffic movements to and from sites can impact on amenity along the routes used. Policy 5 will seek to minimise such impacts where possible, for example through the use of ultra-low and zero emission vehicles. Access to transport networks including sustainable transport modes was considered when assessing the suitability of new sites and areas. Rail and water <s>road</s> transport is particularly desirable when waste is travelling long distances. Policy 5 considers sustainable transport modes in planning decisions.</td></tr>
<tr><td>MM12</td><td>29</td><td>New after 5.3</td><td>A Data Study Addendum (2020) was prepared to support the Main Modifications to the NLWP. The Data Study Addendum proposes modifications to the way data is presented in the NLWP so that the reader can more readily follow the line of justification and reasoning behind the approach to waste management in North London.</td></tr>
<tr><td>MM13</td><td>30</td><td>New after Fig 8</td><td>How North London’s waste is currently managed

Around 66% of waste generated in North London is managed in North London, excluding excavation waste. The amounts of North London’s waste managed within North London and elsewhere is set out in Table 2. This section sets out how and where each waste stream is currently managed.</td></tr>
<tr><td>MM14</td><td>37</td><td>Revised Table 4</td><td>Revised Table 4 : The amount of North London’s waste managed in North London and elsewhere (2016) <s>Waste recorded as exported from North London to landfill 2011-2016</s>

<table>
<tr><th>Waste Stream</th><th>Waste arising</th><th>Amount managed in North London</th><th>Amount managed elsewhere in London</th><th>Amount exported to landfill outside London</th><th>Amount exported to other facilities outside London</th></tr>
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<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td>LACW</td><td>845,776</td><td>718,900</td><td>1,000</td><td>68,900</td><td>56,900</td></tr>
<tr><td>C&I</td><td>762,301</td><td>402,900</td><td>34,600</td><td>251,600</td><td>73,000</td></tr>
<tr><td>C&D</td><td>443,180</td><td>248,000</td><td>108,225</td><td>30,200</td><td>31,000</td></tr>
<tr><td>Hazardous (HWDI)</td><td>53,420</td><td>313</td><td>12,663</td><td>8,557</td><td>31,887</td></tr>
<tr><td>Proportion</td><td></td><td>66%</td><td>7.5%</td><td>17%</td><td>9%</td></tr>
<tr><td>Excavation</td><td>747,242</td><td>52,523</td><td>335,862</td><td>265,415</td><td>82,463</td></tr>
<tr><td>Proportion</td><td></td><td>7%</td><td>45%</td><td>35.5%</td><td>11%</td></tr>
</table>
</td></tr>
<tr><td>MM15</td><td>39</td><td>5.29
[moved here after 5.8]</td><td>Some of this capacity will be provided by existing facilities which import waste from outside North London. In 2016, around 1 million tonnes of waste was imported in to North London. Most of the imported waste comes from immediate neighbours in Greater London, the South East and East of England and is managed in transfer stations, treatment facilities and metal recycling sites. ~~Some~~ The type of facilities in North London ~~have~~ with a wider-than-local catchment area ~~and manage waste from outside North London. This~~ include recycling and treatment facilities, in particular metal recycling and end of life vehicle (ELV) facilities as well as facilities for the processing of CDE in to recycled aggregate products for resale. Waste will continue to be imported into North London over the plan period in line with market demands. ~~The extra capacity contributes to achieving net self-sufficiency, or managing the equivalent of the overall quantity of waste within the main categories for North London and London as a whole.~~</td></tr>
<tr><td>MM16</td><td>37</td><td>5.27</td><td>In 2016, ~~1,201,964~~ 1.4 million tonnes of waste was recorded as exported from North London, ~~56%~~ 675,788 tonnes of which went to landfill. Most of the waste deposited to landfill was excavation waste (65%) followed by LACW/C&I (35%). Exports of LACW to landfill ~~in the LACW/C&I category~~ have been steadily declining in recent years~~, however an increase was shown in 2016. This is consistent~~ in line with the waste strategies of the London Mayor and the North London Waste Authority which aim to reduce the amount of waste going to landfill. ~~Therefore the increase in 2016 of exports to landfill in this category can probably be attributed to commercial and industrial waste, although the data does not identify why this has occurred.~~ Data for hazardous waste exports to landfill is shown from both the Waste Data Interrogator</td></tr>
</table>

Ref	Page	Policy/ Paragraph	Main Modification
			(WDI) and the Hazardous Waste Data Interrogator (HWDI). The HWDI is the more accurate of the two for hazardous waste, but the total exports to landfill figure is taken from the WDI only. Exports of CD&E waste generally follow patterns of waste arising, so when more CD&E waste is generated, more is exported. ~~This pattern is shown in Table 4 and Figure 10 below.~~
MM17	37	New [after 5.27]	**Local planning authorities have a duty to cooperate with each other on strategic matters that cross administrative boundaries. Exports of waste from one waste planning authority to another is a strategic cross-boundary matter and is an important consideration in assessing the effectiveness of the NLWP. It is therefore important to understand the destination of North London's waste exports and to understand any issues which could prevent similar amounts of waste being exported in the future.** **Although North London is planning for capacity to meet the equivalent of 100% of its waste arisings, North London has no landfill sites and is not planning to open any landfill sites. This means that waste arising in London which cannot be recycled or recovered and can only be disposed of to landfill will continue to do so. Table 5 identifies the amount of waste which is expected to be disposed of to landfill over the plan period and this will form part of the annual monitoring to ensure that duty to co-operate engagement takes place if there are significant changes from current and anticipated waste exports to landfill.** **It should be noted that exports from and imports into North London are not a measure of North London's net self-sufficiency. Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste need in North London, while recognising that some imports and exports will continue. For most waste streams, the market dictates where the waste is managed, however the more capacity there is within North London, the more opportunity for North London's waste to be managed within its own boundaries.**

Ref	Page	Policy/ Paragraph	Main Modification
MM18	39	5.32	~~Nonetheless, as set out in the exports to landfill paper, alternative capacity at other potential destinations has been identified for the amount of waste currently being exported to those sites earmarked for closure during the plan period.~~ **It is recognised that non-hazardous landfill capacity in the wider south east is declining and no new non-hazardous landfill sites are being put forward by waste operators. A small number of new inert waste sites are being put forward in former mineral works. The lack of landfill capacity in the wider south east is an issue for all WPAs preparing plans and there is a continuing need to plan to manage waste further up the waste hierarchy to help reduce the need for landfill capacity.** ~~The paper shows that There is opportunity for the market to find are both alternative destinations sites and adequate void space in London, South East and East of England for to take North London's 'homeless' waste in the short term between 2018 and 2035. In the longer term, beneficial use of excavation waste and the Circular Economy Statements will assist the North London Boroughs to reduce exports of waste to landfill and monitor the destinations of waste exports.~~ [Moved from 5.31] The destination of waste is largely dependent on market forces and therefore it is not possible to identify specific alternative destinations where North London's waste will go after the closure of landfill sites during the plan period. [Moved from 7.6] The North London Boroughs have established that there is opportunity for the market to find alternative destinations in the wider south east for any of North London's 'homeless' waste in the short term. In the longer term, beneficial use of excavation waste and the Circular Economy Statements will assist the North London Boroughs to reduce exports of waste to landfill and monitor the destinations of waste exports.
MM19	41	6.3 and Table 5	Targets for **North London's** waste **management** ~~managed within North London~~

<table>
<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td></td><td></td><td>renumbered Table 3</td><td>The North London Boroughs have statutory duties to meet recycling and recovery targets and the NLWP will need to be ambitious in order to achieve European Union, national, regional and local targets. These targets taken from the London Plan (March 2021) are as follows:

Table 3<s>5</s>: Recycling and Recovery Targets with 2016 Baseline

<table>
<tr><th>Waste Stream</th><th>Target</th><th>2016 baseline</th></tr>
<tr><td>LACW</td><td><s>50% recycling for LACW by 2025 (c</s>
Contributing towards 65% recycling of municipal waste by 2030<s>)</s></td><td>27<s>9</s>%</td></tr>
<tr><td>C&I</td><td><s>75% recycling by 2030 (c</s>
Contributing towards 65% recycling of municipal waste by 2030<s>)</s></td><td>44<s>52</s>%</td></tr>
<tr><td>C&D</td><td>95% reuse/recycling/recovery <s>by 2020</s></td><td>93<s>50-60</s>%</td></tr>
<tr><td>Excavation</td><td>95% beneficial use</td><td>Not known</td></tr>
<tr><td>Biodegradable or recyclable waste</td><td>Zero biodegradable or recyclable waste to landfill by 2026</td><td>Not known</td></tr>
<tr><td>Hazardous</td><td>Included in LACW, C&I and C&D targets</td><td>N/A</td></tr>
</table></td></tr>
<tr><td>MM20</td><td>34</td><td>5.13</td><td>The European Commission has put forward a Circular Economy Package’. This includes a 65% recycling target for municipal waste (LACW and C&I) by 2030. Notwithstanding the UK leaving the EU, the UK has signed up to delivering these targets as part of Brexit. The Circular Economy Package (CEP) recycling target of 65% municipal waste by 2030 has been superseded by the London Environment Strategy (LES) published in May 2018 in time to be incorporated into the NLWP. The LES aims to achieve 65% recycling from London’s municipal waste by 2030; this will be achieved through a 50% recycling rate from LACW by 2025 (LES Policy 7.2.1) and 75% from business waste by 2030 (LES policy 7.2.2). The LES therefore goes further than the CEP by bringing forward London’s LACW recycling target to 2025. The LES states that the Mayor expects waste authorities to collectively achieve a 50 per cent LACW recycling target by 2025 and aspire to achieve</td></tr>
</table>

Ref	Page	Policy/ Paragraph	Main Modification
			45% household waste recycling by 2025 and 50% by 2030. Responsibility falls largely to London Boroughs in their capacity as waste collection and waste disposal authorities. The NLWA are expected to contribute to the Mayor's targets and produce a waste strategy to show they are acting in conformity with the LES policies and proposals (see LES Box 36). ~~These revised targets have been built into NLWP waste modelling work as part of the revisions to the Data Study, however the new targets have only been applied to C&I waste as it is assumed no change to the projections of the NLWA at this time.~~
MM21	36	5.21	[Part of 5.21 moved here] The London Plan **(March 2021)** includes a target of 95% **reuse/**recycling**/recovery** of **C&D waste** ~~CD&E by 2020~~ **and 95% beneficial use of excavation waste. Beneficial use could include using excavated material within the development, or in habitat creation, flood defences or landfill restoration. Preference should be given to using the materials on-site or within local projects.**
MM22	41	6.4 (part)	Options for ~~managing~~ **modelling** North London's **future** waste **arisings** In accordance with the NPPF (paragraph 35) to ensure the NLWP is justified, a range of options were tested as part of the consideration of reasonable alternatives for ~~managing~~ **modelling** North London's waste **arisings over the plan period. Analysis of and consultation on these options led** ~~leading~~ to **the** selection of ~~the~~ **a** preferred strategy. **These options seek to reflect the effects of future economic activity, including fiscal, financial and legislative factors such as landfill tax charges driving waste away from landfill, and financial incentives such as ROCs (Renewable Obligations Certificates) increasing the competitiveness of energy recovery. Employment growth is based on demographic projections of employment in the London Plan using North London Borough employment projections and is applied to the growth rates for the C&I and CD&E streams. For the LACW stream, the NLWA have provided the projections which have been used to inform the application for a Development Consent Order to enable them to develop and operate an Energy**

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<tr><td></td><td></td><td></td><td>Recovery Facility (ERF) at the Edmonton EcoPark from 2026. The scenarios considered are summarised in Table 4, with the preferred scenarios highlighted. ~~looked at a range of options for recycling from maintaining the status quo to seeking to maximise opportunities for recycling in line with the targets set out in Table 5 above, the latter option being the most popular option and taken forward. Along with this a number of options were also considered in relation to waste growth over the plan period and what impact that would have on waste growth, again 3 approaches were modelled looking at no growth, growth in line with the London Plan (March 2016) for C&I and CDE waste – with LACW growth being in line with that of the NLWA for all options, a minimised growth was also modelled but was not considered in line with the growth planned for in the London Plan (March 2016), as such growth was modelled in line with the London Plan (March 2016).~~

[Moved down to after new Table 5]

[An Options Appraisal Report (2018) has been prepared which provides more detail on each of the options considered and provides information on the different scenarios including how much waste would be generated over the plan period (incorporating economic and population growth assumptions), how much waste could be managed within North London (capacity strategy), and how this waste should be managed (management strategy) for each of the options considered. The preferred option identified in the Options Appraisal has been carried through to the NLWP. The preferred option seeks to achieve growth in line with the London Plan (March 2016) and to deliver the targets set out in the Mayor’s Environment Strategy.]</td></tr>
<tr><td>MM23</td><td>41</td><td>New Table after 6.4</td><td>Table 4: Options considered for forecasting North London’s waste arisings and need

<table>
<tr><th>LACW</th><th>C&I</th><th>C&D</th><th>Excavation</th><th>Hazardous</th><th>Agricultural</th></tr>
<tr><th colspan="6">Capacity options</th></tr>
<tr><td>Meeting the London Plan apportionment</td><td>Meeting the London Plan apportionment</td><td>Baseline (no change)</td><td>Baseline (no change)</td><td>Baseline (no change)</td><td>Baseline (no change)</td></tr>
</table>
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Ref	Page	Policy/ Paragraph	Main Modification					
			Net self-sufficiency	**Net self-sufficiency**	**Net self-sufficiency**	**Managing as much as possible in North London**	**Net self-sufficiency**	
			Self-sufficiency	**Self-sufficiency**	**Self-sufficiency**		**Self-sufficiency**	
			Growth Options					
				No growth (0% pa)	**No growth (0% pa)**	**No growth (0% pa)**	**No growth (0% pa)**	**No growth (0% pa)**
				Minimised growth (0.40% pa)	**Minimised growth (0.40% pa)**	**Minimised growth (0.40% pa)**	**Minimised growth (0.40% pa)**	
			NLWA Waste Forecasting Model3	**Growth (0.81% pa)**	**Growth (0.81% pa)**	**Growth (0.81% pa)**	**Growth (0.81% pa)**	
			Management Options					
				Baseline (no change)	**Baseline (no change)**	**Baseline (no change)**	**Baseline (no change)**	**Baseline (no change)**
				Median 80% recycling by 2035 16% Energy Recovery by 2035 4% to Landfill by 2035	**Median 85% recycling 9% treatment 6% landfill**			
			NLWA Forecasting model Central Scenario 44% recycling by	**Maximised 85% Recycling by 2035 12% Energy Recovery by**	**Maximised 95% recycling / recovery /**	**Maximised 95% beneficial use 5% landfill**		

Ref	Page	Policy/ Paragraph	Main Modification
			2035 (50% HH recycling by 2035) 55% Energy Recovery by 2035 1% landfill | **2035 3% to Landfill by 2035** | **reuse 5% landfill**
MM24	41	6.4 (part) [Moved to after new Table 5]	**Further details of these options is available in NLWP Data Study 2**. An Options Appraisal Report (201**9**~~8~~) has also been prepared which provides more detail on each of the options considered and provides information on the different scenarios including how much waste would be generated over the plan period (incorporating economic and population growth assumptions), how much waste could be managed within North London (~~capacity strategy~~ **net self-sufficiency options**), and how this waste should be managed (management ~~strategy~~ **options**) for each of the options considered. **Meeting North London's LACW, C&I and C&D waste arisings, including hazardous waste, was the preferred net self-sufficiency option because it is compliant with national legislation on managing all main waste streams. In addition, it demonstrates to neighbouring authorities outside London that North London intends to manage as much of its own waste as possible and reduce exports. Growth of 0.81% was chosen as the preferred option because GLA evidence and projections anticipate substantial population and economic growth in London over the next few decades. Maximised Recycling was chosen as the preferred option for the management strategy because it aligns with national, regional and local recycling targets. This option also means that more waste will be managed further up the waste hierarchy with more opportunity to divert waste away from landfill.** ~~The preferred option identified in the Options Appraisal has been carried through to the NLWP. The preferred option seeks to achieve growth in line with the London Plan (March 2016) and to deliver the targets set out in the Mayor's Environment Strategy.~~
MM25	42	New below 6.6	**The results of the modelling of the preferred strategy for waste arisings over the plan period is set out in Table 5 below. The baseline data for these projections are the waste arisings figures set out in Table 1 of this plan. These figures represent two sets of projections. The first is how North London's waste is most likely to be managed over the**

Ref	Page	Policy/ Paragraph	Main Modification
			plan period, aligned with the levels in the waste hierarchy (see STRATEGIC OBJECTIVE 1). While some of North London's waste will still be exported for management or disposal to landfill, the aim of the NLWP is to deliver the equivalent capacity for LACW, C&I, C&D and hazardous waste within its administrative borders. Therefore Table 8 also shows the total amount of waste arising in North London which the Boroughs need to provide capacity for (net self-sufficiency). This is in line with STRATEGIC OBJECTIVE 3 which is to plan for net self-sufficiency by providing opportunities to manage as much as practicable of North London's waste within the Plan area. Prevention and re-use also have a part to play, but in terms of waste management capacity in North London, recovery and recycling will play the most substantial part. **Table 8 sets out waste arisings over the plan period and how much of the total will need to be recycled to meet the Mayor's targets shown in Table 3. The LACW figures in Table 5 are taken from the NLWP data study which reflects the NLWA modelling. The NLWA model is based on achieving 50% household waste recycling. Over 80% of total LACW is household waste and the remainder is mostly business waste. The NLWA model assumes business waste recycling improves gradually over time as business waste recycling continues to be encouraged and recycling behaviours change. The combined household and business waste recycling rate in the NLWA model is 44%. In order to meet the Mayor's target of 65% recycling of municipal waste by 2030, around 85% of the 'municipal' portion of the C&I waste stream needs to be recycled. The 'municipal' portion of the C&I waste stream is estimated to be around two thirds of the total [footnote]. The recycling rates for the municipal portion of the C&I waste stream rise to 85% by 2030 which, together with household and business waste recycling in the LACW waste stream, achieves 65% recycling of municipal waste by 2030 in line with the Mayor's target. The C&D waste stream has a recycling rate of 95% and excavation waste a beneficial use rate of 95% in line with the London Plan targets.** **[footnote] Separate figures for municipal and other C&I waste are set out in the Data Study Addendum Appendix A: Waste arisings forecast scenario taken forward in the NLWP.**

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<tr><td>MM26</td><td>48</td><td>Table 8 renumbered Table 5 [revised and moved here]</td><td>

Table 5: Projected arisings and management of North London's waste 2020-2035

<table>
<tr><th>Waste Stream</th><th>Facility Type</th><th>2020</th><th>2025</th><th>2030</th><th>2035</th></tr>
<tr><td>LACW</td><td>Recycling</td><td>418,169</td><td>424,049</td><td>430,280</td><td>436,824</td></tr>
<tr><td>LACW</td><td>Recovery (EfW), Treatment</td><td>566,872</td><td>572,856</td><td>579,725</td><td>587,352</td></tr>
<tr><td>LACW</td><td>Landfill</td><td>2,000</td><td>2,000</td><td>2,000</td><td>2,000</td></tr>
<tr><td colspan="2">Total LACW arisings (capacity required for net self-sufficiency)</td><td>987,041</td><td>998,905</td><td>1,012,005</td><td>1,026,176</td></tr>
<tr><td>C&I</td><td>Recycling</td><td>525,853</td><td>566,563</td><td>609,743</td><td>634,983</td></tr>
<tr><td>C&I</td><td>Recovery (EfW), Treatment</td><td>152,448</td><td>142,523</td><td>131,513</td><td>136,957</td></tr>
<tr><td>C&I</td><td>Landfill</td><td>109,139</td><td>110,951</td><td>112,726</td><td>117,392</td></tr>
<tr><td colspan="2">Total C&I waste arisings (capacity required for net self-sufficiency)</td><td>787,440</td><td>820,037</td><td>853,982</td><td>889,332</td></tr>
<tr><td>C&D</td><td>Recycling</td><td>435,054</td><td>453,063</td><td>471,816</td><td>491,347</td></tr>
<tr><td>C&D</td><td>Landfill</td><td>22,742</td><td>23,683</td><td>24,664</td><td>25,685</td></tr>
<tr><td colspan="2">Total C&D waste arisings (capacity required for net self-sufficiency)</td><td>457,796</td><td>476,746</td><td>496,480</td><td>517,032</td></tr>
<tr><td>Hazardous</td><td>Recycling</td><td>16,838</td><td>16,838</td><td>16,838</td><td>16,838</td></tr>
<tr><td>Hazardous</td><td>Recovery, Treatment</td><td>23,846</td><td>23,846</td><td>23,846</td><td>23,846</td></tr>
<tr><td>Hazardous</td><td>Landfill</td><td>12,737</td><td>12,737</td><td>12,737</td><td>12,737</td></tr>
<tr><td colspan="2">Total Hazardous waste arisings (capacity required for net self-sufficiency)</td><td>53,421</td><td>53,421</td><td>53,421</td><td>53,421</td></tr>
<tr><td>Excavation</td><td>Beneficial use, Recycling, Treatment</td><td>733,294</td><td>763,647</td><td>795,257</td><td>828,176</td></tr>
<tr><td>Excavation</td><td>Landfill</td><td>38,594</td><td>40,192</td><td>41,856</td><td>43,588</td></tr>
<tr><td colspan="2">Total Excavation waste arisings</td><td>771,888</td><td>803,839</td><td>837,113</td><td>871,764</td></tr>
</table>

</td></tr>
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<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td>Agricultural</td><td>Recycling</td><td>89</td><td>89</td><td>89</td><td>89</td></tr>
<tr><td>Agricultural</td><td>Recovery, Treatment</td><td>9,130</td><td>9,130</td><td>9,130</td><td>9,130</td></tr>
<tr><td>Agricultural</td><td>Landfill</td><td>4</td><td>4</td><td>4</td><td>4</td></tr>
<tr><td colspan="2">Total Agricultural waste arisings</td><td>9,223</td><td>9,223</td><td>9,223</td><td>9,223</td></tr>
</table>
</td></tr>
<tr><td>MM27</td><td>30</td><td>5.5 [Moved here after Table 8]</td><td>Existing capacity

Table 6<s>3</s> below summarises <s>shows</s> the existing (2016<s>8</s>) capacity of North London's waste management facilities <s>in North London</s> by type of facility and waste stream managed <s>and changes in available capacity at known dates when facilities come on stream/close</s>. It identifies an existing waste management capacity of <s>around 4.4</s> just over a million tonnes per annum of recycling/composting for the LACW and C&I waste streams, just under 600,000 tonnes per annum of energy recovery for LACW, around 630,000 tonnes per annum of recycling and treatment for CD&E waste, and about 4,250 tonnes of hazardous waste capacity <s>reducing to around 3.8 million tonnes by 2029 as a result of known closure of some existing sites up to 2028</s>. Figure 5<s>9</s> shows the location of the facilities represented in Table 6<s>3</s> and a full list is in Appendix 1.</td></tr>
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<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td>MM28</td><td>31</td><td>Table 3 renumbered Table 6 [Revised and moved here after 5.5]</td><td>Table 6<s>3</s>: <s>Maximum</s> Existing Annual Capacity at Licensed Operational Waste Management Facilities <s>at the Start of the Plan Period and a key dates following changes in sites capacities</s>

<table>
<tr><th colspan="2">Type of capacity</th><th>Waste stream</th><th>Existing capacity (2016)</th></tr>
<tr><td rowspan="5">Management</td><td rowspan="3">Recycling/Composting/Treatment</td><td>LACW / C&I</td><td>1,062,424</td></tr>
<tr><td>CD&E</td><td>663,436</td></tr>
<tr><td>Hazardous</td><td>4,252</td></tr>
<tr><td>Energy Recovery</td><td>LACW / C&I</td><td>597,134</td></tr>
<tr><td>Transfer</td><td>All</td><td>1,225,068</td></tr>
<tr><td>Landfill</td><td>All</td><td>0</td></tr>
</table>

Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2012-2016</td></tr>
<tr><td>MM29</td><td>32</td><td>5.6 [Moved here]</td><td>The London Plan defines the technologies and processes which constitute ‘managing’ waste and these have been applied to North London’s facilities when calculating capacity. Only facilities which recycle and compost waste or recover energy from waste count towards waste ‘management’ in North London. Transfer Stations are therefore excluded from this total, although many facilities categorised as ‘transfer stations’ do some recycling and where recycling takes place at transfer stations this has been noted in the site profiles and added to the total in Table 6. <s>When considering the overall amount of waste generated identified in Table 2 against the current capacity of waste management facilities in North London identified in Table 3, there appears to be more than enough waste management capacity. However, this does not take into account the specialism of each type of facility or</s></td></tr>
</table>

Ref	Page	Policy/ Paragraph	Main Modification
			~~importantly, since North London is a net exporter of waste in terms of tonnage, imports to and exports from the area.~~
MM30	32	New paragraph after repositioned 5.6	**Changes to Capacity over the Plan Period** **Waste management capacity in North London will change over the plan period with some facilities moving or closing down and new facilities being built. This section sets out what we currently know about such changes.**
MM31	55	8.5 Moved here	Edmonton EcoPark A Development Consent Order (DCO) has been approved by the Secretary of State for **a** ~~the~~ new **Energy Recovery Facility (**ERF**)** which will manage the treatment of the residual element of LACW during the NLWP plan period and beyond. **The existing Edmonton EfW provides just under 600,000 tonnes of waste management capacity per annum and the new facility will provide around 700,000 tonnes per annum. This is an additional 100,000 tonnes which has been built into the calculation for the capacity gap.** ~~The replacement facility, expected to be operational from 2025, will generate power for around 127,000 homes and provide heat for local homes and businesses as part of a decentralised energy network known as the Lee Valley Heat Network, trading as energetik.'~~
MM32	55	8.6 Moved here	The NLWA's DCO allows for the loss of the composting plant at the Edmonton EcoPark site in 2020 to make way for the new ERF facility to be built whilst maintaining the current EfW operation **and the NLWA are not intending to build a replacement facility. This will result in a capacity loss of around 35,200 tonnes per annum. This has also been built into the calculation of the capacity gap**. The development also includes a Resource Recovery Facility (RRF) including a new Reuse and Recycling Centre (RRC), a relocated transfer hall and a bulky waste/fuel preparation facility on the site.

Ref	Page	Policy/ Paragraph	Main Modification
MM33	56	8.10 Moved here	Powerday Powerday in Enfield is an existing site currently operating as a Waste Transfer Station. Planning permission was granted for an upgrade to a Materials Recovery Facility (MRF) capable of handling 300,000 tonnes of C&I and C&D waste per annum and the new facility was opened in 2015. **However, this increase in capacity has not yet happened and it is not clear if the planning permission will be implemented. Therefore this has not been added to the pipeline capacity, however throughput for the site will be monitored and if additional capacity comes online it will be used to close the capacity gap.**
MM34	56	8.11 Moved here	Loss and re-provision of existing waste management facilities Where existing sites need to be relocated, compensatory capacity is required in order to comply with the London Plan, Borough Local Plans and~~, once adopted,~~ the NLWP. It is known that some **waste sites in North London will be redeveloped for other uses as part of the Brent Cross Cricklewood Regeneration scheme**~~. capacity will be lost~~ during the plan period.~~ Some of this capacity will be replaced within North London, some outside North London with a net loss to North London but not to London as a whole, and some is as yet unknown. Where such issues are known and new sites have already been sought, this information has been fed into the Plan process and~~ **This** information has been ~~given~~ **highlighted** in Schedule 1.
MM35	56	8.12 Moved here	The ~~North London Boroughs are aware that the~~ regeneration of Brent Cross Cricklewood **Regeneration Area** ~~redevelopment~~ (BXC) ~~is likely to affect~~ **includes four** existing waste sites, comprising a NLWA transfer station and three commercial operations. **These are BAR3 PB Donoghue, BAR4 Hendon Transfer Station, BAR6 McGovern, and BAR7 Cripps Skips.** These sites will be redeveloped under the approved planning permission for the regeneration of Brent Cross Cricklewood (Barnet planning application reference F/04687/13). The Hendon Rail Transfer Station (BAR 4) will be replaced ~~as part of the BXC development~~ with a new facility ~~on site S01-BA~~ to meet the NLWA's requirements**; planning permission for a new Waste Transfer Station (WTS) at Geron Way was granted by Barnet Council in September 2018**

Ref	Page	Policy/ Paragraph	Main Modification
			(Barnet planning application reference 17/6714/EIA). The existing **commercial** facilities at BAR 6 and BAR 7 fall within the land required to deliver the **early** ~~first~~ Southern phase of the BXC regeneration which **has commenced** ~~is anticipated will commence in early 2018. Replacement capacity for these sites will not be provided prior to their redevelopment and therefore replacement capacity will be sought outside of the BXC regeneration area on alternative sites / areas to be identified by the London Borough of Barnet by 2025 in line with the planning permission~~. **The BAR3 site is currently identified for redevelopment in Phase 4 of the BXC regeneration. It is planned that capacity at the waste facilities of BAR 4, BAR 6 and BAR 7 and part of the capacity of BAR 3 would be replaced by the new Waste Transfer Station (WTS) delivered as part of the Brent Cross Cricklewood Regeneration. The balance of replacement capacity for BAR3 would need to be identified prior to its redevelopment and the London Borough of Barnet will seek to provide replacement capacity within the borough. The Barnet Local Plan will identify potential sites. For the purposes of the NLWP, therefore, it is assumed there will be no loss of capacity for these facilities.**
MM36	56	New para after repositioned 8.12	**Two facilities in Waltham Forest (GBN Services and Pulse Environmental) have closed and their capacity has been replaced in a new facility operated by GBN services in Enfield. While the capacity has moved to a different Borough, there is no loss of capacity for North London as a whole. The new GBN facility is newly built but has been designed with sufficient capacity to replace that lost at the two Waltham Forest facilities and therefore, for the purposes of the plan the capacity of these facilities is assumed to remain the same. The new facility may also be able to provide capacity on top of what has been replaced, and this will be monitored.**
MM37	42	6.7	Meeting the Capacity Gap **The capacity gap is the difference between projected waste arisings (Table 5) and existing capacity (Table 6).** Table **7**~~6~~ below sets out the capacity gap broken down in to 5 year periods over the NLWP plan period. **It takes account of the known changes to capacity over**

<table>
<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td></td><td></td><td></td><td>the plan period, including the upgrading and loss of existing facilities. ~~The capacity gap is the difference between tonnage associated with existing and planned waste management capacity (see Table 3 – section 5) and the quantity of waste to be managed over the plan period (see the chosen approach set out above).~~ North London can accommodate recycling, composting, treatment and recovery facilities to manage waste and so additional waste management capacity will be in the 'recycling' and 'recovery' tiers of the waste hierarchy. ~~This method identifies whether there is adequate or surplus capacity, or a requirement for additional facilities. Table 6 sets out the capacity gaps for each management route. Negative figures indicate a capacity gap and therefore the type of management route for which capacity is sought over the plan period. The boxes that are not highlighted denote where 'surplus' capacity exists.~~</td></tr>
<tr><td>MM38</td><td>43</td><td>Table 6 renumbered Table 7</td><td>[Revised]

Table 7~~6~~: Capacity gaps throughout the Plan period (tonnes) ~~– chosen option~~

<table>
<tr><th>LACW/C&I</th><th>2020</th><th>2025</th><th>2030</th><th>2035</th></tr>
<tr><td>Projections</td><td>7,774,481</td><td>1,818,942</td><td>1,865,987</td><td>1,915,508</td></tr>
<tr><td>Existing capacity – recycling/composting</td><td>1,076,129</td><td>1,076,129</td><td>1,076,129</td><td>1,076,129</td></tr>
<tr><td>Existing and pipeline capacity - recovery</td><td>597,134</td><td>700,000</td><td>700,000</td><td>700,000</td></tr>
<tr><td>Loss of capacity - composting</td><td>-</td><td>35,200</td><td>3 5,200</td><td>35,200</td></tr>
<tr><td>Capacity Gap</td><td>-101,218</td><td>-78,013</td><td>-125,058</td><td>-174,579</td></tr>
</table>

<table>
<tr><th>C&D</th><th>2020</th><th>2025</th><th>2030</th><th>2035</th></tr>
<tr><td>Projections</td><td>457,796</td><td>457,746</td><td>496,480</td><td>517,032</td></tr>
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<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td>Existing capacity</td><td>633,436</td><td>633,436</td><td>633,436</td><td>633,436</td></tr>
<tr><td>Additional pipeline capacity</td><td>0</td><td>0</td><td>0</td><td>0</td></tr>
<tr><td>Surplus capacity</td><td>+175,640</td><td>+156,690</td><td>+136,956</td><td>+116,404</td></tr>
</table>
<table>
<tr><th>Hazardous</th><th>2020</th><th>2025</th><th>2030</th><th>2035</th></tr>
<tr><td>Projections</td><td>53,421</td><td>53,421</td><td>53,421</td><td>53,421</td></tr>
<tr><td>Existing and pipeline capacity</td><td>4,252</td><td>4,252</td><td>4,252</td><td>4,252</td></tr>
<tr><td>Capacity Gap</td><td>-49,169</td><td>-49,169</td><td>-49,169</td><td>-49,169</td></tr>
</table>
</td></tr>
<tr><td>MM39</td><td>43</td><td>New para after Revised Table 6, now Table 7</td><td>To meet the capacity gaps identified in Table 7, the North London Boroughs will seek opportunities for new capacity through intensification of existing sites and/or new facilities. The North London Boroughs contacted existing waste operators to find out if there are any current plans to upgrade or intensify their facilities (see chapter 8 and Policy 1).</td></tr>
<tr><td>MM40</td><td>43</td><td>6.8</td><td>~~The capacity gap figures in tonnage of waste have been converted to waste management land requirement using data from evidence gathered and evaluated on typical capacity and land take~~ In order to estimate how much land is required for plan-making purposes, the capacity gap has been converted into a land area requirement based on a typical throughput per hectare for each type of facility. The amount of land required depends on the type of facility and the technology being used. New technologies may come forward during the plan period which have a higher throughput per hectare and so will require less land. The North London Boroughs want to ensure the best use of land in the area and this means maximising the capacity of a site while mitigating any environmental impacts. The land required is indicative only and new capacity will be monitored rather than land. Reference capacities are set out in ~~the table~~ Table 8 below. Table 20 in section 7 of the Data Study Part 2 (2019<u>8</u>) ~~available on the website (www.nlwp.net)~~ provides a fuller explanation. Table 9 below sets out the amount of land required within North London to meet the</td></tr>
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<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td></td><td></td><td></td><td>capacity gaps identified in Table 7 for the chosen approach of net self-sufficiency for LACW, C&I and C&D waste streams. In order for net self-sufficiency to be achieved by 2026, in line with the London Plan, new capacity will need to be delivered by this date.</td></tr>
<tr><td>MM41</td><td>44</td><td>New Table numbered Table 8</td><td>Table 8: Reference Capacities for Land Take for New Waste Facilities

<table><tr><th>Facility Type</th><th>Assumed tonnes per hectare</th></tr><tr><td>Energy from waste (large scale)</td><td>165,000</td></tr><tr><td>Energy from waste (small scale)</td><td>50,000</td></tr><tr><td>Recycling (C+I & LACW)</td><td>128,000</td></tr><tr><td>Recycling (C+D)</td><td>100,000</td></tr><tr><td>Recycling (specialised – eg. Metals)</td><td>50,000</td></tr><tr><td>Recycling (Hazardous)</td><td>10,000</td></tr><tr><td>Re-use</td><td>15,000</td></tr><tr><td>Composting</td><td>25,000</td></tr><tr><td>Treatment Plant</td><td>50,000</td></tr><tr><td>Treatment Plant (Hazardous)</td><td>10,000</td></tr></table></td></tr>
<tr><td>MM42</td><td>45</td><td>Table 7 revised and renumbered Table 9</td><td>[Table 7 revised]

Table ~~7~~9: Indicative land take requirements for meeting the capacity gap ~~net self-sufficiency for LACW, C&I and C&D (requirements for London Plant apportionment in brackets)~~</td></tr>
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<tr><td></td><td></td><td></td><td>
<table>
<tr><th>Waste Stream</th><th>Management type</th><th>Hectares
2026</th></tr>
<tr><td>C&I/LACW</td><td>Recycling</td><td>1.5</td></tr>
<tr><td>Hazardous</td><td>Recycling/recovery/ treatment</td><td>4.9</td></tr>
<tr><td>TOTAL land required in North London</td><td></td><td>6.4</td></tr>
</table>
</td></tr>
<tr><td>MM43</td><td>45</td><td>6.10</td><td>A capacity gap equivalent to ~~two~~ around 4.9 hectares of land has been identified for meeting North London’s hazardous waste management need over the plan period~~, a small requirement of less than 2,500 tonnes per annum has also been identified for recovery of hazardous waste, but this figure is considered too small to plan for~~. While the North London Boroughs support the provision of hazardous waste facilities in appropriate locations, it is acknowledged that these facilities generally operate for a wider-than-local catchment area due to their specialist nature. The Boroughs will therefore work with the GLA and other boroughs across London to identify and meet a regional need.</td></tr>
<tr><td>MM44</td><td>54</td><td>New paragraphs after 8.1</td><td>At the core of waste planning is the requirement for waste planning authorities to “prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams” (NPPW 3). In particular, waste planning authorities should “identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations” (NPPW 4).

The London Plan (Policy SI8) requires Development Plans to plan for identified need and “allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste”. The London Plan also identifies existing waste sites, Strategic Industrial Land (SIL) and Locally Significant Industrial Sites as a focus for new waste capacity.</td></tr>
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Ref	Page	Policy/ Paragraph	Main Modification
			STRATEGIC OBJECTIVE 2 seeks to ensure there is sufficient suitable land available to meet North London's waste management needs and reduce the movements of waste through safeguarding existing sites and identifying locations for new waste facilities. **Known opportunities to intensify and upgrade existing facilities have already been taken into account in section 6 and have been incorporated into the calculations for meeting the capacity gap. Where further opportunities to optimise waste management capacity on existing sites arise, this is supported by Policy 1 where the proposal is in line with relevant aims and policies in the North London Waste Plan, the London Plan, Local Plans and related guidance.** **North London's identified waste need and capacity gap is set out in section 6 and summarised in Table 7 above. Additional facilities to meet the capacity gap would require approximately 6.4ha of land, depending on the type of technology used.**
MM45	54	8.2 [Restructured]	The ~~NLWP identifies a number~~ ~~of~~ **North London Boroughs assessed a range of sites and** areas to meet future waste needs. Assessment criteria have been developed using waste planning policy and in consultation with key stakeholders in a series of focus groups. **This work is set out in the Sites and Areas Report.** ~~It was initially intended to also identify sites within the NLWP, i.e.~~ **A 'site' in this context is an** individual plot~~s~~ of land that ~~would be~~ **is** safeguarded for waste use **only**. ~~However, only one site was brought forward by landowners during the call for sites exercises and no further sites are required for the management of LACW. As a result, only areas have been identified.~~ An 'area' comprises a number of individual plots of land, for example, an industrial estate or employment area that is in principle suitable for waste use but where land is not specifically safeguarded for waste. The NPPW and the ~~draft~~ London Plan endorse the identification of "sites and/or areas" in Local Plans. The approach is also supported by the waste industry and key stakeholder in consultation.

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MM46	57	8.20	**When seeking suitable locations for new waste facilities, the Boroughs took into account NPPW paragraph 4 which states that waste planning authorities should "consider a broad range of locations including industrial sites" and "give priority to the re-use of previously developed land [and] sites identified for employment uses". The London Plan identifies suitable locations in policy SI8 as existing waste sites and SIL/LSIS. Waste facilities are considered to be industrial uses and are therefore considered suitable, in principle, to be developed on any industrial land in North London. However, in preparing the NLWP, the North London Boroughs have sought to refine this approach and direct new waste facilities towards locations assessed and selected as the most suitable in North London which are identified as "Priority Areas" in the Plan.** The ~~proposed site and area search~~ criteria used in the NLWP site and area selection process were developed based on the requirements of the **National Planning Policy Framework, National Planning Policy for Waste [footnote], Planning Practice Guidance and the London Plan** ~~national waste planning policy~~. Both planning and spatial criteria were discussed with key stakeholders through a focus group session in spring 2014. **[footnote]** Following the introduction of the **National Planning Policy for Waste** (NPPW) in October 2014 **to replace Planning Policy Statement 10**, the site **and area** search criteria were reviewed to ensure compliance with this document.
MM47	58	8.21	An extensive site and area search and selection process has been undertaken. Full details of the site selection exercise are set out in the 'Sites and Areas Report' **and the 'Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP'** Report available on the NLWP website. In summary it has involved the following key stages: […] **x. Following consultation responses on the Draft Plan, a Sites and Areas Options Appraisal was prepared to analyse a number of different approaches for reducing the total quantum of land identified for new waste facilities and creating a better**

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			geographical spread of waste facilities in line with Spatial Principle B. This resulted in the reduction of total land identified for new waste facilities from 351.8ha in the Draft Plan to 102.38ha in the Proposed Submission Plan.
MM48	61	8.24	~~In preparing this (Proposed Submission) version of the NLWP, and deciding which sites and areas to take forward, the North London Boroughs took into account national and regional policy, the aims of the NLWP and consultation responses on the Draft Plan, including issues raised around deliverability and other constraints. Further work was undertaken to gather and assess additional information on the proposed sites and areas received during the consultation or as a result of new data being published.~~ **In order to respond to issues raised during consultation on the suitability of the Draft Plan proposed sites and areas, the North London Boroughs undertook four areas of further work in order to identify which sites and areas should be taken forward:** • **Gather and assess additional information on sites/areas** • **Changes to policy wording on reducing the impact of new waste development** • **Seek a better geographical spread of waste facilities** • **Consider options to reduce the amount of land taken forward in the Proposed Submission Plan**
MM49	61	New paragraphs after 8.24	**The additional information gathered and assessed included transport evaluations, potential mitigation measures, updating flood risk information and other environmental factors, consideration of where waste facilities might be best located within an Area, heritage and National Grid assets, and identifying Areas within an Opportunity Area, Housing Zone, Crossrail 2 or Lee Valley Regional Park. This information helped inform amendments to Policy 6, and Area Profiles were updated accordingly with a further assessment of the suitability of the proposed sites and areas undertaken.** **In response to comments about the distribution of waste facilities across North London, Spatial Principle B was amended from 'Seek a network of waste sites across North London' to 'Seek a better geographical spread of waste sites across North London,**

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			consistent with the principles of sustainable development'. This change provided the basis for further work on the distribution of Areas taken forward in the Proposed Submission Plan.
MM50	61	8.25 [restructured and split]	~~The North London Boroughs developed a range of reasonable options for taking forward sites and areas in the Proposed Submission version of the plan. Further~~ **In considering geographical spread of facilities and reducing the sites and areas to be taken forward in the Proposed Submission Plan, each Borough's current contribution to waste management capacity In North London was calculated. Currently 62% of the total land in existing waste use across North London is located in Enfield. In order to address concerns that there is an over-concentration of waste facilities in Enfield, promote a better geographic spread of waste facilities in North London, and reduce the amount of land taken forward into the Proposed Submission Plan, the Boroughs considered five alternatives with different land options. The** details **of these options** are **brought together** ~~set out~~ in 'Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP' **(Updated 2020)**~~(2018)~~. **The options included and excluded areas based on their performance against qualitative assessment criteria, such as Local Plan designations and performance against suitability rating (banding) as detailed in the Sites and Areas Report. Analysis of each of the five options considered, amongst other issues, the proportion of Enfield's contribution to the Areas identified. One of the options limited the number of Areas for new waste facilities in Enfield to one. The option with the lowest land provided (102ha) combined with the best geographical spread (limiting the land identified in Enfield) has been taken forward into this Plan. In looking to reduce the total amount of land identified as most suitable for new waste uses, the Boroughs did not identify any criterion which would provide a sound basis to reduce the number of areas further than a combined total of 102ha. The other options did not significantly reduce the amount of land identified and/or did not provide a better geographical spread of Areas.** The preferred option was to take forward land designated as industrial land and high-performing (Band B) ~~sites/~~areas, while achieving a better geographical spread by reducing the ~~number of sites~~ **amount of land for new waste facilities** identified in Enfield. This focus on industrial land and the highest performing areas helps to locate

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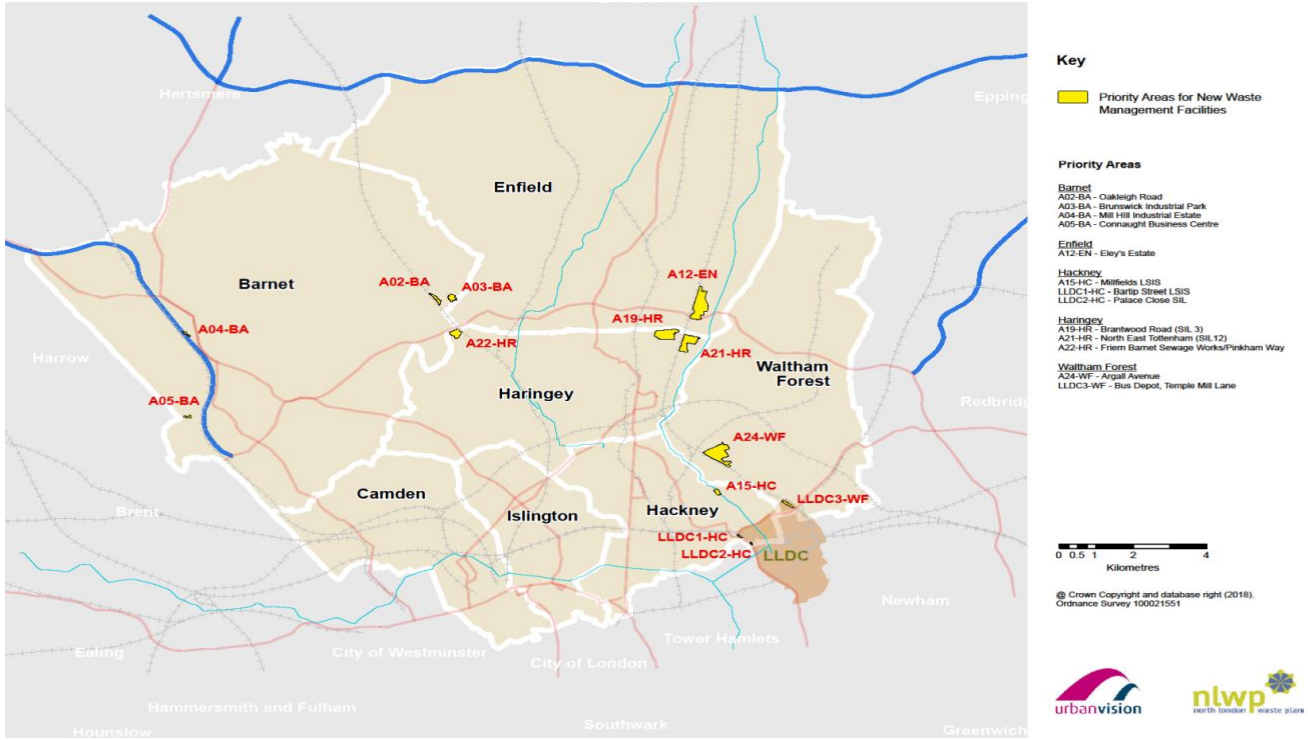
			waste facilities away from residential properties, as far as this is possible in an urban area like North London.
MM51	61	New after 8.25	**Following the work described above, all of the individual sites and several of the Areas were removed from Schedules 2 and 3 and in some of the remaining Areas the amount of land considered most suitable for new waste facilities was refined. The NLWP therefore takes an area-based approach to waste planning with no individual sites allocated for new waste facilities. An area-based approach is one which identifies areas which comprise a number of individual plots of land, for example, an industrial estate or employment area, that is in principle suitable for waste use but where land is not specifically safeguarded for waste uses. The identification of Areas allows for flexibility in bringing forward a range of locations across North London, allowing for a better geographic spread of opportunities for future waste development that is consistent with the spatial principles of the plan to meet North London's requirement. However, because the Areas identified are not safeguarded solely for waste use it is important to identify sufficient land to ensure adequate opportunity across North London for waste operators to provide new facilities because there will competition for this land by other industrial users. It should be noted that most waste planning authorities are in the same position and that this approach is supported by both the NPPW and the London Plan.** **An update to the Data Study to support the Proposed Submission NLWP reduced the indicative land required to meet the capacity gap from 12ha in the Draft NLWP to 9ha in the Proposed Submission NLWP. This has since reduced further to 6.4ha in light of the Data Study Addendum (2020). For the Plan to provide confidence that sufficient land is available in the right place and at the right time a quantum of land and number of Areas has to be identified.** **As identified in the Sites and Areas Report, it is not possible to say precisely how much of North London's industrial land could become available for waste uses over the plan**

Ref	Page	Policy/ Paragraph	Main Modification
			period. This depends on the rate at which existing land becomes vacant in the identified Areas and a waste operator being ready and able to locate on that same site. This in turn depends on the wider economic factors. Identifying a range of land suitable for new waste facilities responds to the NPPW expectation that waste planning authorities "should identify sufficient opportunities to meet the identified needs of their area". This also provides flexibility for waste operators and should sites not become available in one particular Area, or if an Area changes over the plan period to become unsuitable for waste uses, this approach will ensure there are alternative land options available. **The work set out in the 'Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP' resulted in reducing the total amount of land identified as most suitable for new waste facilities from 351.8 in the Draft Plan to 102.38ha in the Proposed Submission Plan. While 102ha is a large area when compared to the need for 6.4ha, this land is currently occupied by existing industrial uses. There is strong competition for industrial land in North London and this is reflected by low vacancy rates (an average of 4.8%). The Boroughs will rely on business churn for release of individual sites which could come forward for waste uses. The most recent analysis of business churn in London suggests that around 20% of land could be released in this way. Analysis of business churn and vacancy rates is included in the Sites and Areas Report. To provide 6.4ha, 6% of the Priority Areas would need to be developed for waste management to meet the capacity gap, if no additional capacity is provided on existing sites. It should be noted that 6.4ha of land is indicative only and throughput on a site will depend on the operational technology used. New capacity to meet North London's needs will be monitored rather than land take.** **The preferred approach limits the areas proposed for new waste facilities in Enfield to one industrial area and although this option is considered the most appropriate to take forward in the NLWP, there is a risk that the identified Area in Enfield (comprising 26ha) could accommodate all new waste capacity, which would not respect Spatial Principle B or generally encourage a sustainable distribution. There is also a possibility that applications could come forward for new waste facilities on other industrial land in**

Ref	Page	Policy/ Paragraph	Main Modification
			Enfield. To address this, the 'Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP' recommends a 'Priority Areas' sequential approach to ensure developers consider siting a facility within the Areas listed in Schedules 2 and 3 before other locations. In addition, developers should seek sites in Priority Areas outside Enfield before considering sites in Enfield. This recommendation has been taken forward in Policy 2: Priority Areas for New Waste Management Facilities and Policy 3: Windfall Sites.
MM52	61	8.26	The **Priority Areas** ~~areas~~, shown in Figure 13 (see also Schedule**s** 2 **and 3** in section 9), have been identified as **the most** suitable for built waste management facilities. The **Priority Areas** ~~areas~~ are being put forward as they comply with the NLWP Spatial **Principles** ~~Framework~~ which is reflected in the site **and area** selection criteria, as well as a range of environmental, social and economic criteria set out in the Sustainability Appraisal Scoping Report. **In the absence of the identification of individual sites, the Priority Areas represent sufficient opportunities to deliver the identified waste management needs of North London over the plan period.** ~~During the course of the plan, it is expected that land will become available as part of the business churn.~~ **In order to ensure that Priority Areas are the focus for new waste capacity, the location of new waste facilities and any compensatory capacity will be monitored through Monitoring Indicator IN3. The aim of the indicator is to check that sites in Priority Areas are being taken up as anticipated and also monitor if land within Schedules 1, 2 and 3 is not available or suitable for new waste facilities. The later aspect in particular will enable the Boroughs and developers to understand where sufficient land remains available and the geographic distribution of new waste facilities, which will inform potential site searches and evidence required by the Boroughs for those seeking planning consent for sites for waste uses. The monitoring will help to demonstrate the progress of the spatial principle for better geographical spread and achievement of the sequential approach to delivery of new waste sites set out in Policies 2 and 3.** Any proposals for waste facilities within the **Priority Areas** ~~areas~~ will be subject to planning permission. ~~No provision is made for landfill due to the inability of the Plan area to accommodate development of landfill.~~

Ref	Page	Policy/ Paragraph	Main Modification
MM53	63	Figure 10	**Figure** 11~~0~~: **Priority Areas for new waste management facilities** ~~Location of proposed new areas~~ 
MM54	47	7.2	**Most of North London's waste capacity need is met through its existing facilities. These existing facilities are safeguarded through London Plan policy, however they are not always in the most sustainable locations. The NLWP seeks to make the most of the existing infrastructure by supporting intensification of existing sites, where appropriate, while enabling relocation to more sustainable locations for replacement capacity (see Policy 1).** Existing capacity and additional new capacity will be needed to meet North London's identified need for waste management over the plan period (2020-2035). **The Boroughs are**

Ref	Page	Policy/ Paragraph	Main Modification
			seeking a sustainable network of waste facilities which helps reduce movements of waste, including waste exports and increase opportunities for waste to be managed in proximity to its source. Existing waste capacity in North London is ~~safeguarded and~~ set out in Schedule 1 (**see Policy 1 and** Appendix 1) and ~~land~~ **Priority Areas** for new waste facilities is set out in Schedule**s** 2 **and 3** (see Policy 3). **The Priority Areas for new waste capacity represent the most suitable land when assessed against the Spatial Principles, including a better geographical spread, and the assessment criteria detailed in the previous chapter. This helps to deliver STRATEGIC OBJECTIVE 2 which seeks to ensure there is sufficient suitable land available to meet North London's waste management needs.** The focus for new waste capacity in North London is for recycling and recovery facilities to manage the quantities of waste set out in Table **5**~~8~~, thereby reducing exports. **New waste facilities will be assessed against the criteria in Policy 5.**
MM55	48	7.4	The North London Boroughs will monitor the NLWP against the **projected** quantities of waste **generated** set out in Table **5**, **(IN1), new waste management capacity delivered (IN2), the locations of new waste facilities and compensatory capacity (IN3) and the amount of waste exported (IN7)** to ensure the <u>strategic</u> **over-arching** policy is being delivered. **All** monitoring indicators are set out in Section 10 of this plan.
MM56	49	7.8	Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste streams comprise similar types of waste. **Most facilities which manage these waste streams do not differentiate between them and so it is reasonable to group them together when assessing existing capacity and planning for additional capacity.** ~~The NLWP identifies sufficient land to manage the equivalent of all LACW and C&I waste arising in North London by 2026.~~
MM57	49	New after 7.8	**There is a capacity gap of up to around 174,500 tonnes for LACW and C&I waste over the plan period. This equates to approximately 1.5 hectares of land, depending on the technology of the facility/ies. This calculation includes the increase in EfW capacity and the loss of composting capacity at Edmonton EcoPark.**

Ref	Page	Policy/ Paragraph	Main Modification
MM58	49	7.9	The North London Waste Authority (NLWA) **and seven constituent boroughs are** ~~is seeking to achieve a household waste recycling target of 50% by 2020 consistent with the targets set out in the~~ **required to prepare a** ~~North London~~ Joint Waste Strategy **(JWS) for North London. The most recent JWS came to an end in December 2020. A key element of that strategy has been met through the granting of permission for a replacement energy recovery facility at the Edmonton EcoPark to treat residual waste. A replacement JWS will be developed by NLWA in conjunction with the seven constituent boroughs, but requires a clear position on the circular economy and recycling from central government; it is hoped that this will be within the next year. The new Joint Waste Strategy will focus on activities to move all waste up the waste hierarchy. In the short term, a Residual Waste Reduction Plan has been agreed after consultation with constituent boroughs. This Plan forms a short-term strategic approach from NLWA, which will inform the development of the next Joint Waste Strategy. The NLWA expect a new JWS will be being developed in 2021 and 2022. A new JWS will set out how North London will contribute to the Mayor's recycling targets as set out in the London Plan and London Environment Strategy.**
MM59	50	7.10	There is a need for additional capacity for recycling for ~~both~~ **the** LACW/ ~~and~~ C&I waste streams throughout the plan period. ~~As~~ **LACW and C&I are combined for the purposes of waste planning** as many facilities ~~can~~ manage both waste streams~~, the need for recycling is combined~~.
MM60	50	New after 7.11	**There is an opportunity to bring forward new LACW waste recycling/composting capacity on the Friern Barnet Pinkham Way site which is owned by the North London Waste Authority, although presently there are no plans to do so. There are also opportunities to bring forward commercial recycling capacity in all but one of the Priority Areas identified in Schedules 2 and 3, and composting capacity on four of the Priority Areas. Additional capacity and recycling rates will be monitored by Monitoring Indicator IN1 and reported in the Annual Monitoring Report.**
MM61	50	New after 7.14	**There are opportunities for additional recovery capacity to be brought forward on three of the proposed Priority Areas.**

Ref	Page	Policy/ Paragraph	Main Modification
MM62	50	New after 7.15	**Many waste transfer facilities also recycle some of the waste they receive. There is opportunity for waste transfer facilities to come forward on nine of the Priority Areas.**
MM63	51	7.19	Recycling ~~The NLWP will identify sufficient land to manage the equivalent of all~~ **North London has sufficient capacity to manage** Construction and Demolition (C&D) waste arising in North London **over the plan period**. ~~by 2035, while acknowledging that s~~**S**ome exports of excavation waste will continue, but opportunities **to manage as much of this waste stream as practicable within North London will be sought.** ~~particularly for Excavation waste. At least 95% of excavation waste exports will be put to beneficial use~~
MM64	51	7.20	The majority of C&D waste is recycled on site or through transfer facilities. Each Borough Local Plan has a sustainable design and construction policy in place which seeks to minimise waste generated during the design and construction of development and re-use or recycling of materials on-site where possible. **Recycling rates will be monitored by Monitoring Indicator IN1 and reported in the Annual Monitoring Report.**
MM65	51	7.23	Landfill North London has no landfill sites and depends on capacity outside the NLWP area. ~~Some~~ **A reduced amount** of the CD&E waste stream~~, particularly excavation waste,~~ will continue to be exported to landfill **but the majority (95%) of C&D waste will be reused, recycled and recovered and the majority of excavation waste (95%) will be put to beneficial use**. ~~unless opportunities materialise to re-use it locally. It is anticipated that C&D waste exports to landfill will reduce over the plan period while excavation waste exports will increase in line with growth.~~
MM66	52	7.26	Recycling and Recovery

Ref	Page	Policy/ Paragraph	Main Modification
			North London has **a number of facilities which manage** ~~one~~ hazardous waste ~~treatment facility~~ **alongside other non- hazardous waste. The majority of these are** ~~include~~ **vehicle depollution** (car breakers) and metal recycling sites ~~WEEE sites~~. **There are also transfer facilities** ~~as well as~~ **such as** RRCs which will accept **some hazardous waste**, for example, paints and batteries which require specialist treatment and disposal. Such sites will continue to make a valuable contribution to managing North London's hazardous waste requirements. **The amount of hazardous waste managed in North London varies from year to year** with a **maximum** capacity of around **4,250** ~~3,600~~ tonnes **over the last five years.** ~~per annum and two recycling facilities; one for metals and one for end of life vehicles handling around 2,500 tonnes per annum between them. In addition, other facilities permitted to manage hazardous waste~~
MM67	52	7.27	There is a capacity gap for the ~~recovery~~ **management** of around **49,000** ~~2,500~~tonnes per annum, ~~this is considered too small a figure to plan for provision of a new facility and as such a specific land requirement is not identified for this management option. There is a requirement for recycling of around 17,000 tonnes per annum,~~ requiring an estimated **4.9**~~2~~ha of land. The North London Boroughs support the provision of such facilities in **principle in the Priority Areas** ~~appropriate locations~~ and will work with the GLA and other Boroughs across London to meet this need. It is noted in the sites and area profiles in Appendix 2 of the NLWP where a ~~site or area~~ **Priority Area** is not suitable for hazardous waste recycling and recovery facilities. Any applications for hazardous waste facilities in North London that do come forward will be considered on a case by case basis. However, in the short term it is likely that hazardous waste will continue to be exported to the most appropriate specialist facilities.
MM68	64	Policy 1	Policy 1: Existing waste management sites All existing waste management sites identified in *Schedule 1: Existing safeguarded waste sites in North London*, and any other sites that are given planning permission for waste use, are safeguarded for waste use.

Ref	Page	Policy/ Paragraph	Main Modification
			Expansion or intensification of operations at existing waste sites will be ~~supported~~ **permitted** where the proposal is in line with relevant aims and policies in the North London Waste Plan, the London Plan, Local Plans and related guidance. Applications for non-waste uses on safeguarded waste sites will only be permitted where it is clearly demonstrated **by the developer** to the satisfaction of the relevant borough that compensatory capacity will be delivered in line with the Spatial **Principles** ~~Framework~~ on a suitable replacement site in North London that must at least meet, and, if possible, exceed, the maximum achievable throughput of the site proposed to be lost and help to promote the increased geographical spread of waste sites across the plan area. Development proposals ~~in close proximity to existing safeguarded waste sites or sites allocated for waste use~~ which would prevent or prejudice the use of ~~those~~ **existing waste** sites for waste purposes will be resisted under the agent of change principle unless design standards or other suitable mitigation measures are adopted to ensure that the amenity of any new residents would not be significantly adversely impacted by the continuation of waste use at that location or suitable compensatory provision has been made for the waste use elsewhere within the Plan area. This policy helps meet strategic objectives SO2 and SO3 This policy contributes towards Spatial **Principles** ~~Framework components~~ A and C
MM69	65	9.4	The purpose of Policy 1 is to ensure that the existing waste capacity in North London is protected and is able to expand where appropriate. It applies to sites with existing operational waste facilities, and any other sites developed for waste use throughout the plan period. **The safeguarding of waste sites for waste use does not preclude waste operators from moving and selling their site as a waste site.**

Ref	Page	Policy/ Paragraph	Main Modification
MM70	65	9.6	**Some existing waste sites may have the potential to increase their capacity, or provide additional waste services; p**~~P~~Planning applications for ~~expansion of existing waste facilities~~ **such changes** will be ~~supported~~ **permitted** where they are in alignment with policies in this Plan and with Borough Local Plans.
MM71	65	9.7	If, for any reason, an existing waste site is to be lost to non-waste use, compensatory **waste capacity** provision will be required ~~within North London~~. **Compensatory capacity must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost. When assessing the throughput of a site, the maximum throughput achieved over the last five years should be used.** ~~Replacement provision will be calculated using the maximum achievable throughput (tonnes per annum) that the site has achieved as set out in the EA Waste Data Interrogator. Maximum throughput for existing sites 2009-2016 can be found in the Data Study Part 3: Sites Schedule Report Tables 1-7: Assessment of existing waste management capacity.~~ This information is sourced from the Environment Agency's Waste Data Interrogator. **It is the responsibility of the developer to demonstrate that replacement capacity has been provided. Where this information is not available, for example if a waste site has been vacant for a number of years, the potential capacity of the site should be calculated using an appropriate and evidenced throughput per hectare.** Applicants will need to demonstrate that provision of replacement capacity is secured before permission is granted for an alternative use. This could be through a compensatory site of a suitable size to meet at least the maximum annual throughput or an increase of capacity in an existing facility. **Boroughs may consider using conditions or s106 agreements to satisfy themselves that compensatory capacity will be delivered.** ~~However, i~~**I**t may not be necessary for replacement sites to be on a 'like for like' basis, for example, a new site with a larger capacity might replace a number of sites with individually smaller, but combined equivalent, capacity.
MM72	66	9.8 [divided in two]	Compensatory provision should be delivered in accordance with the Spatial **Principles** ~~Framework~~ and such proposals will need to demonstrate compliance with **Policy 2 (Priority Areas for new waste management facilities),** Policy 3 (Windfall sites) and **Policy** 5 (Assessment Criteria for waste management facilities and related development) of the NLWP. ~~The area of search for a replacement site~~ **Compensatory capacity** should be **provided** within North London **unless the**

Ref	Page	Policy/ Paragraph	Main Modification
			NLWP Monitoring Report demonstrates that waste capacity in North London is sufficient to meet net self-sufficiency for LACW, C&I and C&D waste, including hazardous waste (Table 6). If sufficient capacity has been achieved in North London, compensatory capacity should be provided elsewhere in London. If it can be demonstrated that there is sufficient capacity in London to meet London's apportionment and net self-sufficiency targets, it may be possible to justify the release of waste sites for other uses. During the Plan period, where waste sites shown in Schedule 1 are redeveloped for other uses, the amount and location of compensatory provision will be noted in the NLWP AMR (see IN2 in section 10). Sites which are going to be redeveloped for other uses during the plan period are identified in Schedule 1 and should be excluded from the search criteria for potential sites for new or replacement waste facilities. [Begin new para] As set out within Section 4, a key Spatial Principle of the NLWP is to establish a geographical spread of waste sites across North London, consistent with the principles of sustainable development. The aim is to ensure that waste is managed efficiently and as close to its source as possible whilst minimising any negative cumulative impacts resulting from a high concentration of waste facilities. Avoiding an unduly high concentration of waste facilities in a location is consistent with the overarching objectives of sustainable development, identified within the NPPF and would leave land available for other uses. **Policy 2 identifies the Priority Areas for new waste management facilities and a sequential approach to site selection.** The most suitable location for the re-provision of a site lost to non-waste development may therefore not necessarily be within the same north London borough as the displaced site. Adequate evidence of compensatory provision will be required to the satisfaction of the local planning authority before planning permission for redevelopment proposing loss of a facility is granted.
MM73	66	9.9	Any sites that come forward and receive planning permission for waste development which are implemented in the lifetime of the NLWP will be regarded as existing waste sites in North London and safeguarded under the provisions of this Policy (1). **As part of the monitoring of the plan,**

Ref	Page	Policy/ Paragraph	Main Modification
			waste arisings (IN1) the tonnage of waste capacity available by management type and type of wastes handled (IN2) and the loss of existing waste capacity and provision of replacement capacity (IN4), will be monitored (see section 10). The most up-to-date list of existing waste management sites will be found in the NLWP AMR. Where existing waste sites are lost, but compensatory provision has been made to the satisfaction of the Borough, this will be noted in the AMR. In time the safeguarded designation will be removed from the relevant Borough's policies map.
MM74	66	9.10	[…] The NPPF and the ~~draft~~ London Plan sets out the 'Agent of Change' principle. This principle places the responsibility of mitigating the ~~noise~~ impact **of noise, dust, vibration and other nuisance-generating activities** (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 in that location, otherwise such developments will not be permitted. Accordingly proposed non-waste developments should be designed to protect both the amenity of potential new residential developments and the existing waste operation within that area.
MM75	67	New after 9.10	**Some existing waste sites may be having an adverse impact on surrounding uses such as schools and residential areas. The waste operator is responsible for ensuring that its regulated facility does not cause pollution of the environment and harm to human health. The operator's performance in relation to that responsibility is assessed by checking compliance with the terms and conditions of the permit. Environmental permits are issued by either the Environment Agency for large-scale facilities and those with greater risk to the environment (known as "A1 installations") or the local authority for smaller-scale facilities with lower risk to the environment (which include "A2 installations" and "Part B installations"). Local authorities hold a register of these permits which are available to view on request.**

Ref	Page	Policy/ Paragraph	Main Modification
			The responsibility for checking compliance falls to the issuer of the permit (the regulator). The Environmental Permitting Regulations (EPR) place a duty on regulators to undertake appropriate periodic inspections of regulated facilities. The EPR are the basis for any enforcement action and the principal offences are: **• operating a regulated facility without a permit;** **• causing or knowingly permitting a water discharge activity or groundwater activity without a permit; and** **• failing to comply with a permit condition, flood risk activity emergency works notice, flood risk remediation notice or an enforcement-related notice.** **Operator competence can be considered by the regulator at any time, whether as part of the determination of an application or at any time during the life of the permit. The regulator can suspend or revoke the permit if an operator fails to comply with the conditions of the permit, risking harm to the environment or human health. The North London Boroughs will monitor any enforcement action taken against waste operators (IN6) to ensure that existing waste facilities do not cause harm to the environment or local communities. This will be published as part of the NLWP Annual Monitoring Report. Any additional information on enforcement action can be requested from the regulator.**
MM76	67	Policy 2	Policy 2: **Priority Areas** for new waste management facilities Areas listed in *Schedule 2:* ~~Areas suitable~~ ***Priority Areas*** *for waste management* and *Schedule 3:* ~~Areas~~ ***Priority Areas*** *identified in LLDC Local Plan* are identified as suitable for built waste management facilities **to meet the identified need set out in Tables 5 and 7**. **To help meet the spatial principle to create a better geographical spread of waste facilities in North London, developers should first seek sites in Priority Areas outside Enfield, and must demonstrate that no sites are available or suitable before considering sites within Enfield's Priority Area.**

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<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
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Applications for waste management development will be permitted on suitable land within the ~~areas~~ Priority Areas identified in Schedule 2 subject to other policies in the North London Waste Plan, the London Plan and Local Plans, and related guidance.

Development proposals will need to manage waste as far up the waste hierarchy as practicable. Development proposals for materials and waste management sites are encouraged where they deliver a range of complementary waste management and secondary material processing facilities on a single site.

Applications for waste management development within the ~~areas~~ Priority Areas identified in Schedule 3 will be assessed by the London Legacy Development Corporation.

This policy helps meet strategic objectives SO1, SO2, SO3 and SO5

This policy contributes towards Spatial Principles ~~Framework components~~ B, C and E ~~F~~
</td></tr>
<tr><td>MM77</td><td>67</td><td>Schedules 2 and 3</td><td>
Table 11: Schedule 2 ~~Areas suitable~~ Priority Areas for waste management

<table>
<tr><th rowspan="2">Area ref</th><th rowspan="2">Area Name</th><th rowspan="2">Size ~~Area~~ (ha)</th><th rowspan="2">Borough</th><th colspan="5">Waste Facility Type</th></tr>
<tr><th>A</th><th>B</th><th>C</th><th>D</th><th>E</th></tr>
<tr><td>A02-BA</td><td>Oakleigh Road</td><td>0.99</td><td>Barnet</td><td>X</td><td></td><td>X</td><td></td><td>X</td></tr>
<tr><td>A03-BA</td><td>Brunswick Industrial Park</td><td>3.9</td><td>Barnet</td><td>X</td><td></td><td></td><td></td><td>X</td></tr>
<tr><td>A04-BA</td><td>Mill Hill Industrial Estate</td><td>0.9</td><td>Barnet</td><td>X</td><td></td><td></td><td></td><td>X</td></tr>
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A05-BA	Connaught Business Centre	0.9	Barnet	X				X
A12-EN	Eley's Estate	26.1	Enfield	X	X	X	X	X
A15-HC	Millfields LSIS	1.48	Hackney			~~X~~		**X**
A19-HR	Brantwood Road	16.9	Haringey	X			X	X
A21-HR	North East Tottenham	15.32	Haringey	X			X	X
A22-HR	Friern Barnet Sewage Works/Pinkham Way	5.95	Haringey	X	X			X
A24-WF	Argall Avenue	26.91	Waltham Forest	X	X			X

Table 12: Schedule 3 ~~Areas~~ **Priority Areas** identified in LLDC Local Plan

Area ref	Area Name	**Size** ~~Area~~ (ha)	Borough	Waste Facility Type				
				A	B	C	D	E
LLDC1-HC	Bartrip Street	0.6	Hackney	X				X
LLDC2-HC	Chapman Road (Palace Close)	0.33	Hackney	X				X
LLDC3-WF	Temple Mill Lane	2.1	Waltham Forest	X	X			X

Table 13: Key to Waste management Facility Type

	Facility type

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<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
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<table>
<tr><td>A</td><td>Recycling</td></tr>
<tr><td>B</td><td>Composting (including indoor / in-vessel composting)</td></tr>
<tr><td>C</td><td>Integrated resource recovery facilities / resource parks</td></tr>
<tr><td>D</td><td>Waste recovery or treatment facility (including thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment)</td></tr>
<tr><td>E</td><td>Waste transfer</td></tr>
</table>
</td></tr>
<tr><td>MM78</td><td>68</td><td>9.11
[rearranged]</td><td>National and European requirements state that waste plans must identify locations where future waste development may take place. In addition, the London Plan requires boroughs to allocate sufficient land to provide capacity to manage apportioned waste. Policy 2 identifies ~~areas~~ Priority Areas for new waste facilities and their suitability for a range of built waste management facilities. These Priority Areas have been assessed against national, regional and local criteria, including the Strategic Objectives and Spatial Principles, and represent the most suitable areas for new waste facilities in North London. To help redress the high proportion of North London’s waste facilities already in Enfield (62%), and help deliver a better geographical spread of sites (Spatial Principle B), developers wishing to provide additional waste capacity on a new site in North London are required to demonstrate that no land is available or suitable in Priority Areas outside of Enfield before considering the Priority Area identified within the Borough. This applies to additional capacity only and not to the expansion or intensification of existing waste sites or providing compensatory capacity for sites already in Enfield. The exception to this sequential approach to site search is for Recycling and Reuse Centres (RRCs) where there is an identified need in Enfield and Barnet to improve the coverage across North London (see Policy 4). The evidence will need to demonstrate an adequate search has been undertaken which takes into account the type of waste facility proposed, the criteria set out in Table 10 and the criteria set out in policy 6.</td></tr>
<tr><td>MM79</td><td>68</td><td>9.13</td><td>In Schedules 2 and 3, the NLWP identifies thirteen ~~several areas~~ Priority Areas to provide land suitable for the development of waste management facilities, including RRCs (see Policy 4). Each ~~‘area’~~ Priority Area comprises ~~a number of individual plots of land, for example,~~ an industrial estate or employment area that is in principle suitable for waste use ~~but where land is not safeguarded for waste~~. The identification of ~~areas~~ Priority Areas ~~suitable~~ for waste uses,</td></tr>
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Ref	Page	Policy/ Paragraph	Main Modification
			subject to detailed site assessment at planning application stage, will help to achieve net self-sufficiency whilst encouraging co-location of facilities and complementary activities (an objective of the NPPW and Spatial **Principle C** ~~Framework~~). **Areas listed in Schedule 2:** ~~Areas~~ **Priority Areas** listed in *Schedule 2: ~~Areas suitable~~* ***Priority Areas*** *for waste management and Schedule 3: ~~Areas~~* ***Priority Areas*** *identified in LLDC Local Plan* **suitable for waste management and Schedule 3: Areas identified in LLDC Local Plan suitable for new waste facilities will be identified in borough policies maps, and any new waste sites will be safeguarded and identified in borough policies maps.**
MM80	68	9.14	The ~~areas~~ **Priority Areas** are considered to be in the most suitable, sustainable and deliverable locations in North London for new waste management facilities when assessed against a range of environmental, economic and social factors **(see STRATEGIC OBJECTIVE 5)** and the Spatial **Principles** ~~Framework~~. **The location of new waste facilities and compensatory capacity will be monitored through Monitoring Indicator IN3.**
MM81	69	9.15	~~The site~~ **Area** profiles in Appendix 2 **are provided to assist developers who wish to build a waste facility in North London. The Profiles** indicate the size of each ~~area~~ **Priority Areas**, the type of facility likely to be accommodated on the area, **constraints,** and any mitigation measures which may be required. Developers should be aware that any type of facility listed as potentially suitable is subject to consideration against the full suite of relevant local planning policies/guidance.
MM82	69	9.16	The ability of ~~areas~~ **Priority Areas** to accommodate a range of types and sizes of waste management facility is important to the flexibility of the Waste Plan. Table 13: Key to Waste Management Facility Types contains a full list of the types of facilities which were considered when assessing ~~sites~~ **Areas** and which may be required over the plan period to meet the identified capacity gap **and to provide new sites for compensatory capacity**. The facility types identified are broad categories which may come forward over the plan period. The order of facility types reflects their place in the waste hierarchy, with categories A and B at the 'recycling' level and C-E at the 'other recovery' level. Applicants should take account of this order when

Ref	Page	Policy/ Paragraph	Main Modification
			responding to the second criteria of Policy 2 which requires development proposals to manage waste as far up the waste hierarchy as practicable **in line with STRATEGIC OBJECTIVE 1**.
MM83	70	Policy 3	Policy 3: Windfall Sites Applications for waste development on windfall sites outside of the **existing** sites and ~~areas~~ **Priority Areas for new waste management facilities** identified in Schedules 1,2 and 3 will be permitted provided that the proposal can demonstrate that: a) the sites and ~~areas~~ **Priority Areas** identified in Schedules 1, 2 and 3 are not available or suitable for the proposed use or the proposed site would be better suited to meeting the identified need having regard to the Spatial Principles; **New) sites have first been sought outside Enfield before sites within Enfield were considered, and that no sites outside Enfield are available or suitable, in line with Spatial Principle B;** b) the proposed site meets the criteria for built facilities used in the site selection process (see Table 10 of Section 8 of the NLWP) the proposal fits within the NLWP Spatial **Principles** ~~Framework~~, and contributes to the delivery of the NLWP aim and objectives; […] This policy contributes towards Spatial ~~Framework~~ **Principles** ~~components~~ B **and C**
MM84	71	9.23	Developers of windfall sites are required to demonstrate why **it is not possible to use, expand or intensify an existing waste site set out in Schedule 1 or why** ~~the~~ sites ~~and~~ **in the** ~~areas~~ **Priority Areas** in Schedules ~~1,~~ 2 and 3 are not available or suitable. **In addition, to help address concerns that there is a high proportion of North London's waste facilities already in Enfield, and help deliver a better geographical spread of sites (Spatial Principle B), developers are required to demonstrate that no sites are available or suitable outside of Enfield before considering those within the Borough. The exception**

Ref	Page	Policy/ Paragraph	Main Modification
			to this is for Recycling and Reuse Centres (RRCs) where there is an identified need in Enfield and Barnet to improve the coverage across North London (see Policy 4). The evidence will need to demonstrate an adequate search has been undertaken which takes into account the type of waste facility proposed, the criteria set out in Table 10 and the criteria set out in policy 6. [split paragraph] **Developers proposing waste sites outside the Priority Areas will be expected to demonstrate** ~~or~~ that the proposed site would be better suited to meeting the identified need **for North London** having regard to **delivering** the Spatial Principles of the NLWP. **For example, a windfall site may deliver a better geographic spread of facilities in North London (Spatial Principle B), or there may be an opportunity to co-locate a recycling facility with a reprocessing plant (Spatial Principle C) or an opportunity for small scale expansion of an existing site onto adjacent land which helps facilitate the maximum use of an existing waste site and enable co-location of facilities.** There may be instances in the future where advances in waste technologies are such that **existing sites or Priority Areas** ~~the identified sites/areas~~ do not meet the technical requirements of a proposed waste management facility, for example, the identified locations might be too small for the proposed development or the facility may need to be located near a specific waste producer or user of heat. Some of the ~~areas~~ **Priority Areas** identified in Policy 2 may become unavailable over the Plan period because they will be used for other purposes or affected by future development proposals such as Crossrail 2 and Opportunity Areas. Locating certain types of waste processing sites within large scale redevelopment areas may also have benefits for reducing need for waste transport especially during the construction phase for the management of CDE. In addition, it is also recognised that proposals on windfall site may come forward to provide capacity for displaced facilities from within the plan area where existing capacity needs to be re-provided locally and this need cannot be met through the existing allocations

Ref	Page	Policy/ Paragraph	Main Modification
MM85	71	9.24	Proposals for waste development on windfall sites will be supported where the proposal would not compromise existing planning designations and where the impacts on communities and environment can be satisfactorily controlled. ~~This~~ **In proposing a windfall site, developers will need to demonstrate that the spatial principles set out in chapter 4 have been considered, and in particular** ~~should not work against~~ **that the proposed site can deliver** the **spatial** principle of balanced geographical distribution **of waste facilities across North London, taking into account the concentration of existing waste sites in Enfield with reference to the NLWP Annual Monitoring Report** ~~as set out in the Spatial Framework~~.
MM86	73	Policy 4	**Policy 4 – Re-use & Recycling Centres** Proposals for Re-use & Recycling Centres will be permitted where: a) They **improve the coverage of centres across the North London Boroughs, in particular** ~~are sited~~ in an area of identified need for new facilities in Barnet or Enfield ~~or elsewhere where they improve the coverage of centres across the North London Boroughs~~, and; b) They are in line with relevant aims and policies in the North London Waste Plan, London Plan, Local Plans and other related guidance. This policy helps meet strategic objectives SO1, SO2 and SO3 This policy contributes towards Spatial ~~Framework~~ **Principles** ~~components~~ **A and** B
MM87	74	9.33	Re-use & Recycling Centres should be located where they can provide appropriate access for members of the public and for contractors and their vehicles. They are best sited on former waste sites or in areas of industrial or employment land and need to be of a sufficient size for the range and quantity of materials likely to be received. Sites within areas identified in Schedules **1,** 2 and 3 ~~Areas suitable for waste management~~ are likely to be **the most** suitable **locations, and Policy**

Ref	Page	Policy/ Paragraph	Main Modification
			3: Windfall Sites will apply to any application for a RRC outside of these areas. There may be scope to provide localised recycling centres as part of major new development.
MM88	74	Policy 5	Policy 5: Assessment Criteria for waste management facilities and related development Applications for waste management facilities and related development, including those replacing or expanding existing sites, will be required to demonstrate to the satisfaction of the relevant Borough that: **New after a) the proposal maximises the waste management capacity of the site** c) the facility will be enclosed unless justification can be provided by the developer ~~as to why that is not necessary~~ **that an equivalent level of protection can be permanently achieved by other means**. f) there is no significant adverse impact on ~~the historic environment (heritage assets and their settings, and undesignated remains within Archaeological Priority Areas),~~ open spaces or land in recreational use or landscape character of the area including the Lee Valley Regional Park; **New after f) heritage assets and their settings are conserved and where appropriate enhanced;** i) the development **avoids increasing the levels of vulnerability to climate change, makes appropriate adaptation and mitigation measures to achieve this, and helps**

Ref	Page	Policy/ Paragraph	Main Modification
			reduce greenhouse gas emissions ~~makes the fullest possible contribution to climate change adaptation and mitigation~~ ~~m)~~ ~~appropriate permits are held or have been applied for from the Environment Agency~~ This policy helps meet strategic objectives SO4, SO5, SO7 and SO8 This policy contributes towards Spatial ~~Framework~~ **Principles** ~~component~~ **C,** E **and F**
MM89	75	9.34	Policy 5 seeks to ensure that the construction and operation of waste facilities does not give rise to an unacceptable impact **on health**, or harm the amenity of local residents or the environment. Amenity is defined as any element providing positive attributes to the local area and its residents and impacts can include such issues as, **but not limited to, increased levels of local air pollution,** increased noise disturbance, light impacts including increased light or reduced light or sunlight, reduced privacy, loss of outlook and reduced visual amenity. Applicants will need to demonstrate that appropriate measures **and/or Best Available Techniques (BAT) (where applicable)** have been taken to minimise any potential impacts from the proposed waste development to ensure the protection of local amenity **and health**. The specific requirements will vary from site to site, however issues to be addressed may include strict hours of operation, effective cladding on buildings to prevent noise pollution, and dust and odour suppression systems as appropriate. These issues are discussed in more detail below. **Policy 5 helps deliver a number of the STRATEGIC OBJECTIVES, including SO4 which seeks high standards of design, SO5 which seeks to integrate social, environmental and economic considerations, SO6 which seeks a low carbon economy, SO7 which supports the use of sustainable forms of transport, and SO8 which seeks to protect the natural environment, biodiversity, cultural and historic environment.**
MM90	75	New para after 9.34	**London Plan policy SI8 promotes capacity increases at waste sites and where appropriate to maximise their use. In order to demonstrate that North London's land is being used to its highest potential, developers are required to provide evidence that the**

Ref	Page	Policy/ Paragraph	Main Modification
			waste management capacity on a site has been optimised. This could be in reference to similar facilities operating to a high standard.
MM91	77	9.37	The supporting documents should set out how landscape proposals can be incorporated as an integral part of the overall development of the site and how the development contributes to the quality of the wider urban environment. The applicant will need to demonstrate that there will be no significant adverse effect on areas or features of landscape~~,~~ ~~historic~~ or nature conservation value. Where relevant, **applications for waste management facilities and related development will be required to demonstrate that they conserve and where appropriate enhance heritage assets and their settings, including consideration of non-designated archaeology where relevant** ~~the delivery of waste facilities (through construction to operation) should take account of the need to conserve and enhance the historic environment~~ in line with the NPPF.
MM92	78	9.40	Waste and recyclables require transportation at various stages of their collection and management and so opportunities to employ more sustainable options such as rail and river should be fully considered. **STRATEGIC OBJECTIVE 7 supports the use of sustainable forms of transport and minimise the impacts of waste movements including on climate change.** North London is characterised by heavy traffic on all principal roads. That is why developers need to prioritise non-road forms of transport if at all possible and to set out their assessment **of sustainable transport options** in a Transport Assessment detailing transport issues to be submitted with any planning applications for waste facilities (see below). In North London there exists considerable potential for sustainable transport of waste as part of the waste management process. There are a number of railway lines and navigable waterways in North London including the Regents Canal and the Lee Navigation. It is existing practice to transport waste by train and pilot projects have taken place to transport waste by water. Developers are required to demonstrate that they have considered the potential to use water and rail to transport waste before reliance on transport of waste by road. Where the site lies adjacent to a wharf or waterway, capable of transporting waste, developers need to demonstrate that consideration has been given to the provision and/or enhancement of wharf facilities. **This will be monitored through Monitoring Indicator IN5 (see Chapter 10). Waste transfer activities that do**

Ref	Page	Policy/ Paragraph	Main Modification
			take advantage of rail and or boat transportation must also ensure that they design their site and meet the standards required by all waste management sites stated in this Plan.
MM93	78	9.41	Applicants will need to submit a Transport Assessment in line with the relevant borough Local Plan policy and the London Plan. The Transport for London Best Practice Guide contains advice on preparing Transport Assessments when they are required to be submitted with planning applications for major developments in London. Consideration should be given to access arrangements, safety and health hazards for other road users, the capacity of local and strategic road networks, impacts on existing highway conditions in terms of traffic congestion and parking, on-site vehicle manoeuvring, parking and loading/unloading areas, and queuing of vehicles. The **Assessment** ~~statement~~ should include a traffic management plan establishing the times of access for vehicles to minimise disruption on the local road network during peak hours, and setting out specific routes to ensure that vehicles are accessing the site via roads considered suitable by the Highways Authority and, where possible, avoid overlooking of the site access by residential properties. **The Assessment should cover the types of vehicles to be used, including opportunities to use ultra-low and zero emission vehicles, alternatives to vehicles powered by the internal combustion engine, and the provision of any infrastructure at future or expanded waste sites to accommodate this. The statement should also cover emission standards and fuel types in line with national and regional air quality standards.**
MM94	79	9.43	The development of Servicing and Delivery Plans and Construction Logistic Plans (CLP) will be encouraged for all waste developments. Such Plans ensure that developments provide for safe, **efficient** and legal delivery and collection, construction and servicing including minimising the risk of collision with vulnerable road users such as cyclists and pedestrians. Consideration should be given to the use of Direct Vision Lorries for all waste vehicles **in line with the Mayor's Vision Zero Action Plan,** and the use of freight operators who can demonstrate their commitment to TfL's Freight Operator Recognition Scheme (FORS) or similar. **Developers need to demonstrate that they can operate servicing and deliveries in the most efficient way that makes best use of transport movements that are made.**

Ref	Page	Policy/ Paragraph	Main Modification
MM95	79	9.44	~~Waste developments should be~~ **Criteria 5j seeks** ~~designed~~ to protect and enhance local **biodiversity**. **Development proposals will be assessed against this policy as well as other relevant principles and policies set out in the NPPF and Borough Local Plans.** […]
MM96	81	9.48	The North London Strategic Flood Risk Assessment (SFRA) and individual borough 'Level 2' SFRAs have demonstrated the **current** risks from **flooding** from ~~various~~ **all** sources **of flood risk** across North London and site specific flooding assessments have been undertaken on **Priority Areas** ~~new~~ ~~sites/areas~~ in schedules 2 and 3. Where a site is near or adjacent to areas of flood risk, the development is expected to contribute through design to a reduction in flood risk, **making as much use as possible of natural flood management techniques, and be appropriately flood resistant and resilient** in line with the **NPPF and** NPPG. **Development proposals will be required to assess the impact of climate change using the latest published climate change allowances, and mitigate to the appropriate future flooding scenario using these allowances. A sequential approach to the layout of the site should be taken aiming to locate development in the parts of the site at lowest risk of flooding from any source.** Waste facilities are often characterised by large areas of hardstanding for vehicles and large roof areas. Development proposals will be required to show that flood risk would not be increased as part of the scheme and, where possible, will be reduced overall through the use of Sustainable Drainage Systems (SuDS) and other techniques. Any proposed development should be reviewed by the Environment Agency at an early stage to discuss the reduction of flood risk on the site.
MM97	83	Policy 6	Policy 6: Energy Recovery and Decentralised Energy Where waste cannot be managed at a higher level in the waste hierarchy ~~and recovery of energy from waste is feasible~~, waste developments **are required to** ~~should~~ generate energy, ~~and/or~~ recover excess heat ~~(including the recovery of energy from gas)~~ and provide a supply to networks including decentralised energy networks **unless it is not technically feasible or economically**

Ref	Page	Policy/ Paragraph	Main Modification
			viable to do so. **Developers must demonstrate how they meet these requirements as part of a submitted Energy Statement.** Where there is no available decentralised energy network and no network is planned within range of the development, as a minimum requirement the proposal should recover energy through electricity production and be designed to enable it to deliver heat and/or energy and connect to a Decentralised Energy Network in the future. ~~Developers must demonstrate how they meet these requirements, or provide evidence if it is not technically feasible or economically viable to achieve them, as part of a submitted Energy Statement.~~ This policy helps meet strategic objectives SO1 and SO6 This policy contributes towards Spatial ~~Framework~~ **Principles** ~~component~~ D
MM98	84	9.61	Work is already underway to progress the delivery of a decentralised network in the Lee Valley known as **Meridian Water** ~~the Lee Valley Heat Network (LVHN)~~. ~~The LVHN~~ **Meridian Water** will capture affordable low carbon heat from waste to energy facilities and combined heat and power plants, supplying it to buildings and industry across the Lee Valley. **Meridian Water** ~~The LVHN~~ is requesting hot water to be supplied for the energy from waste facility (EfW) at Edmonton EcoPark. However, over time, the network will connect additional heat sources, including other waste developments, elsewhere in the Lee Valley. **Any future development, including the current plan for Meridian Water should ensure that the openness and permanence of the Green Belt is maintained in accordance with draft New London Plan Policy G2.**
MM99	84	Policy 7	Proposals for the provision of new facilities for the management, treatment and disposal of wastewater and sewage sludge will be permitted, provided that:

Ref	Page	Policy/ Paragraph	Main Modification
			• it is demonstrated that there is an identified need for such a facility within the North London Waste Plan Area, which cannot be met through existing waste facilities; and • the proposals meet the other policies of this North London Waste Plan together with all other relevant policies of the appropriate borough's Development Plan, ~~and meet environmental standards set by the Environment Agency~~. This policy helps meet strategic objectives SO1, SO2 and SO5 This policy contributes towards Spatial ~~Framework~~ **Principles** ~~component~~ **A and** B
MM100	86	Policy 8	Policy 8: ~~Control of~~ Inert Waste **Inert waste should be managed as far up the waste hierarchy as possible, including on-site recycling and reuse of such material.** Proposals for development using inert waste will be permitted where the proposal is **for beneficial use, including but not limited to:** ~~both essential for, and involves the minimum quantity of waste necessary for:~~ a) ~~The purposes of r~~ **R**estoring former mineral working sites; or b) Facilitating an improvement in the quality of land; or c) Facilitating the establishment of an appropriate use in line with other policies in the Local Plan; or

Ref	Page	Policy/ Paragraph	Main Modification
			d) Improving land damaged or degraded as a result of existing uses and where no other satisfactory means exist to secure the necessary improvement. ~~Where one or more of the above criteria (a-d) are met, a~~ **A**ll proposals using inert waste should: a) Incorporate finished levels that are compatible with the surrounding landscape. The finished levels should be the minimum required to ensure satisfactory restoration of the land for an agreed after-use; and b) Include proposals for high quality restoration and aftercare of the site, taking account of the opportunities for enhancing the overall quality of the environment and the wider benefits that the site may offer, including biodiversity enhancement, geological conservation and increased public accessibility. Proposals for inert waste disposal to land will not be permitted if it can be demonstrated that the waste can be managed through recovery operations ~~and that there is a need to dispose of waste~~. This policy helps meet strategic objectives SO1, SO2 and SO3 This policy contributes towards Spatial ~~Framework~~ **Principle** ~~component~~ B
MM101	87	9.68	Inert waste materials **can be an important resource** and should be used for beneficial purposes, such as the restoration of mineral sites and in engineering works, or at other 'exempt sites' rather than disposed of at inert landfill sites. **A definition of 'beneficial uses' can be found in the new London Plan.** Increased use of recycled and secondary aggregates can reduce the need and demand for primary aggregates extraction. **Sites and operators will need to conform to the 'Aggregates from inert waste Quality Protocol' document to achieve 'end of waste' status. If this cannot be achieved and/or the operator cannot prove compliance with the protocol, then the material will not have achieved 'end of waste' status and will still be considered a waste and subject to controlled waste legislation. There is no 'end of**

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<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td></td><td></td><td></td><td>waste’ criteria for soil so this will always be viewed as a waste once it has become a controlled waste outside of the Definition of Waste Code of Practice.</td></tr>
<tr><td>MM102</td><td>88</td><td>10.3</td><td>Responsibility for monitoring lies with the individual boroughs. However, the boroughs have agreed to monitor the Plan jointly through a lead borough arrangement. Data will be collated ~~by each borough~~ and included in a joint NLWP ~~their Authority~~ Monitoring Report~~, which is produced annually~~ which will be produced annually.</td></tr>
<tr><td>MM103</td><td>90</td><td>10.6 Table 14</td><td>
<table>
<tr><th></th><th>Indicator</th><th>Target(s)</th><th>What it monitors</th><th>What it monitors</th></tr>
<tr><td>IN1</td><td>Waste arisings (Table 6) by waste stream and management route

~~5. Total quantity of waste arisings managed by waste stream (LACW, C&I and CD&E) and management route (recycling/composting, recovery and disposal)~~

~~11. Number of developments permitted which include disposal of inert waste to land~~</td><td>Waste arisings and management in line with forecasts in Table 6 (Baseline Table 3)

~~In line with Table 8 in Section 7 and the Data Study~~

~~To ensure that inert waste is managed in line with the waste hierarchy~~</td><td>Strategic Aim (capacity supply and self-sufficiency) Strategic Aim (move waste up Waste Hierarchy) SO1 (resource efficiency) SO3 (net self-sufficiency)
Meeting Future Requirements as specified in the NLWP
% waste diverted and % landfilled</td><td>To check that the NLWP is planning for the right amount of waste

~~Waste Policy and London Plan targets~~

~~Ensure the NLWP delivers a net self-sufficient waste management outcome for the principal waste streams~~

~~To ensure that proposals involving the importation and disposal of inert waste to land are achieving in line with waste hierarchy.~~</td></tr>
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Ref	Page	Policy/ Paragraph	Main Modification					
			IN2	**Waste management capacity (Table 8) by waste stream and management route, including existing capacity, new capacity, loss of capacity, compensatory capacity and capacity gaps** ~~3. Tonnage of waste capacity, including new waste capacity available by management type (recycling/composting, recovery and disposal) and type of wastes handled (LACW, C&I and CD&E)~~ ~~4. Loss of existing waste capacity and provision of replacement capacity~~	**Capacity to meet net self-sufficiency targets in Tables 6 and 8** Zero loss **of capacity** Replacement ~~locally,~~ within ~~the Borough,~~ North London ~~or London~~ Replacement capacity for Brent Cross Cricklewood provided within Barnet ~~Capacity sufficient to manage capacity requirements as set out in Table 6 Capacity Gaps. New waste facilities in line with Table 7: land take requirements~~	Strategic Aim (capacity supply and self-sufficiency) Strategic Aim (move waste up Waste Hierarchy) SO1 (resource efficiency) SO3 (net self-sufficiency) Meeting Future Requirements as specified in the NLWP Policy 2: Area allocations Policy 3: Unallocated sites Policy 4. Reuse and Recycling Centres Policy 7 Waste Water Treatment Works and Sewage Plant Policy 8 Control of Inert Waste	**To check that capacity is increasing to meet net self-sufficiency targets** <u>Ensure sufficient capacity of the right type is available throughout the plan period</u> Ensure that capacity is replaced locally **unless net self-sufficiency has been met** ~~valid planning reasons are provided for not doing so~~.
			IN3	**Location of new waste facilities and**	**Land within Schedules 1, 2, 3**	SO2 (capacity provision) **Policy 1: Existing waste management sites**	To check that identified sites and areas are being taken up as anticipated.	

Ref	Page	Policy/ Paragraph	Main Modification				
				compensatory capacity ~~1. Amount of Land within identified areas or on windfall sites brought forward for waste use during the plan period.~~	~~In line with Table 7: landtake requirements~~ SO2 (capacity provision) **Policy 1: Existing waste management sites** Policy 2: Area allocations Policy 3: Unallocated sites	Policy 2: Area allocations Policy 3: Unallocated sites	**To monitor if land within Schedules 1, 2 and 3 is not available or suitable for new waste facilities.**
			IN4	~~2.~~ Sites in Schedule 1 and Areas in Schedules 2 and 3 lost to other non-industrial uses through a major regeneration scheme or designated for non-industrial uses in a review of the London Plan or Local Plan	Less than 25% of land lost If 50% of land is lost this will trigger review of plan	SO2 (capacity provision) Policy 2: Area allocations	To check that identified land is sufficient to deliver the plan's aims To ensure sufficient existing capacity remains for managing the levels of waste expected across North London over the plan period as set out in Table 8.
			IN5	**The number of sites consented that offer non-road transport options, the number of those sites where such options have been implemented and the total tonnage**	**Facilities where non-road forms of transport are used to move waste and recycling**	**SO5 (sustainability) SO7 (sustainable transport)**	**Reduce impact on climate change Improve amenity**

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				transported through non-road options (where known).			
			IN6	**Enforcement action taken against waste sites by the local authority and/or Environment Agency on breach of planning conditions or environmental permit** ~~7. Number of approvals for new waste facilities which meet legislative requirements~~	**Zero** ~~100%~~	SO5 (sustainability) SO8 (protect the environment) Spatial **Principles** ~~framework~~ (Reduce impact on amenity) Policy 5: Assessment Criteria for waste management facilities and related development	**To ensure sites do not cause harm to the environment or local communities** ~~Avoid impact on sensitive receptors or maximise scope for effective mitigation~~
			IN7	~~6.~~ Amount of waste **imported and** exported ~~to landfill~~ by waste stream **and management route** ~~(LACW, C&I and CD&E)~~	Exported waste to landfill in line with Table **6**~~9~~ of the NLWP **Reduction in waste exports**	Net self-sufficiency **Changes to imports and exports**	Waste exports are in line with those estimated in the NLWP and through the duty to co-operate
			IN8	~~8.~~ Number of new CHP facilities serving district heat networks in which the principal	Monitor only	Strategic Aim (green London)	Monitor only

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<tr><td></td><td>fuel source is residual waste or recovered waste fuel</td><td></td><td></td><td></td></tr>
<tr><td>IN9</td><td><s>9.</s> Sufficient infrastructure in place for management of waste water</td><td>Monitor only – information to be obtained from Thames Water</td><td>Strategic Aim (capacity supply and self-sufficiency)
SO5 (sustainability)</td><td>To ensure that Thames Water have sufficient capacity to management the levels of waste water generated in North London over the plan period</td></tr>
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</td></tr>
<tr><td>MM104</td><td></td><td>Table 15</td><td>
Table 15: Roles and responsibilities involved in implementing the Plan
<table>
<tr><th>Organisation</th><th>Role</th><th>Responsibilities</th></tr>
<tr><td rowspan="3">Local planning authorities (including London Legacy Development Corporation)</td><td>Apply Plan policies</td><td>Assessing suitability of applications against Plan policies and priorities Deliver the strategic objectives and policies of the NLWP alongside wider development and regeneration objectives</td></tr>
<tr><td>Regulate / monitor</td><td>Inspect operating waste sites periodically

Appoint a lead borough to monitor the plan and carry out the duty to co-operate when required

Publish annual monitoring reports in the NLWP

<s>Monitor Plan performance annually</s></td></tr>
<tr><td>Performance delivery</td><td>Support / promote waste reduction initiatives through the planning system</td></tr>
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<tr><td>MM105a</td><td></td><td>Schedule 1</td><td>~~Table 1:~~ Schedule 1: Existing safeguarded waste sites in North London
<table>
<tr><th>Site ID</th><th>Site Name</th><th>Site Address</th><th>Waste Stream</th><th>Managed Waste</th><th>2012</th><th>2013</th><th>2014</th><th>2015</th><th>2016</th><th>~~Borough~~</th></tr>
<tr><td>BAR1</td><td>Winters Haulage, Oakleigh Road South</td><td>British Rai Sidings, Oakleigh Road South, Southgate, London N11 1HJ</td><td>C&I / CDE</td><td>X</td><td>10,495</td><td>38,503</td><td>40,409</td><td>35,379</td><td>0</td><td></td></tr>
<tr><td>BAR2</td><td>Scratchwood Quarrry</td><td>London Gateway Service Area, M1 Motorway, Mill Hill, London NW7 3HU</td><td>CDE</td><td>✓</td><td>52,835</td><td>71,064</td><td>99,060</td><td>102,527</td><td>131,505</td><td>~~Barnet~~</td></tr>
<tr><td>BAR3 ◆</td><td>P B Donoghue, Claremont Rd</td><td>3 Shannon Close, Claremont Rd, Cricklewood, London NW2 1RR</td><td>CDE</td><td>✓ (95%)</td><td>0</td><td>118,964</td><td>112,449</td><td>112,487</td><td>111,226</td><td>~~Barnet~~</td></tr>
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Ref	Page	Policy/ Paragraph	Main Modification										
			BAR 4◆	WRG, Hendon Rail Transfer Station	**Hendon Rail Transfer Station, Brent Terrace, Hendon, London NW2 1LN**	**LACW**	**X**	**153,952**	**164,129**	**114,457**	**128,605**	**142,107**	~~Barnet~~
			BAR 5	Summers Lane Reuse and Recycling Centre	**Civic Amenity & Waste Recycling Centre, Summers Lane, London N12 0RF**	**LACW**	**X**	**15,612**	**16,361**	**17,206**	**10,584**	**18,237**	~~Barnet~~
			BAR 6◆	McGovern Brothers, Brent Terrace, Hendon	**26-27 Brent Terrace, Claremont Industrial Estate, Hendon, London NW2 1BG**	**C&I / CDE**	**X**	**78,488**	**76,609**	**78,855**	**106,206**	**102,373**	~~Barnet~~
			BAR 7◆	Cripps Skips, Brent Terrace	**Nightingale Works, Brent Terrace, Claremont Way Industrial Estate, London NW2 1LR**	**C&I / CDE**	**X**	**9,726**	**7,719**	**8,807**	**9,408**	**8,910**	~~Barnet~~
			BAR 8	Apex Car Breakers, Mill Hill	**Ellesmere Avenue, Mill Hill, London NW7 3HB**	**C&I**		**182**	**162**	**227**	**256**	**243**	~~Barnet~~

Ref	Page	Policy/ Paragraph	Main Modification										
			BAR 9	**Vacant (previously ~~Railway Arches, Hendon~~ Savecase Ltd)**	**Railway Arches, Colindeep Lane, Hendon, London NW9 6HD**	**C&I**	**N/A**	**0**	**0**	**0**	**0**	**0**	~~Barnet~~	
			BAR 10	GBN Services Ltd, New Southgate	**Land/Premises at Oakleigh Road South, Friern Barnet, London N11 1HJ**	**CDE**	**✓ (72%)**	**14,596**	**29,938**	**29,456**	**31,274**	**10,746**	~~Barnet~~	
			BAR 11	Upside Railway Yard	**Upside Railway Yard, Brent Terrace, Cricklewood, London NW2 1LN**	**CDE**	**X**	**0**	**0**	**0**	**0**	**234,930**	~~Barnet~~	
			CAM 1	Regis Road Reuse and Recycling Centre	**Regis Road, Kentish Town, London NW5 3EW**	**LACW**	**X**	**-**	**2,535**	**5,409**	**5,595**	**5,119**	~~Camden~~	
			ENF 1	Crews Hill Transfer Station	**Kingswood Nursery, Theobalds Park road, Crews Hill, Enfield, Middlesex EN2 9BH**	**C&I**	**X**	**17,466**	**17,124**	**19,231**	**19,507**	**18,427**	~~Enfield~~	
			ENF 2	Barrowell Green Recycling Centre	**Barrowell Green, Winchmore Hill,**	**LACW**	**X**	**10,715**	**14,556**	**13,837**	**11,541**	**16,923**	~~Enfield~~	

Ref	Page	Policy/ Paragraph	Main Modification										
					London N21 3AU								
			ENF 3	Pressbay Mpotors Ltd, Motor Salvage Complex	**Motor Salvage Complex, Mollison Avenue, Brimsdown, Enfield Middlesex EN3 7NJ**	**C&I**	✓	**63**	**63**	**26**	**29**	**37**	~~Enfield~~
			~~ENF 4~~	~~Chase Farm Hospital, The Ridgeway (SITA)~~									~~Enfield~~
			ENF 5	Jute Lane, Brimsdown	**Greenwood House, Jute Lane, Brimsdown, Enfield, Middlesex EN3 7PJ**	**LACW**	✓ **(76%)**	**16,115**	**11,732**	**12,659**	**10,125**	**15,410**	~~Enfield~~
			ENF 6	**AMI Waste (Tuglord Enterprises)** ~~Stacey Avenue~~	**17 Stacey Avenue, Edmonton, London N18 3PP**	**C&I / CDE**	**X**	**16,855**	**27,043**	**28,566**	**23,004**	**21,974**	~~Enfield~~
			ENF 7	**Vacant (formerly** Budds Skips**)**, ~~The Market Compound, Harbert Road~~	**The Market Compound, 2 Harbert Road, Edmonton, London N18 2HQ**	**C&I / CDE**	**-**	**834**	**802**	**1,778**	**0**	**0**	~~Enfield~~
			ENF 8	Biffa Edmonton **(AKA Greenstar Environme**	**Atlas at Aztec 406, 12 Adra Road, Off Meridian**	**LACW / C&I**	✓ **(84%)**	**231,771**	**72,530**	**271,888**	**276,855**	**270,106**	~~Enfield~~

Ref	Page	Policy/ Paragraph	Main Modification											
				ntal)~~, Adra Road, Edmonton~~	**Way, Enfield, London N9 0BD**									
			ENF 9	Hunt Skips, Commercial Road, Edmonton	**Rear of 160 Bridport Road, Commercia l Road, Edmonton, London N18 1SY**	**C&I / CDE**	✓	**9,935**	**-**✓	**20,359**	**-**	**8,719**	~~Enfield~~	
			ENF 10	Rooke & Co Ltd, Edmonton	**Montague Road Industrial Estate, 22-26 First Avenue, Edmonton, London N18 3PH**	**C&I**	✓	**32,249**	**24,867**	**28,095**	**25,235**	**3,897**	~~Enfield~~	
			ENF 11	Edmonton Bio Diesel Plant **(Pure Fuels)**	**Unit A8 Hasting wood Trading Estate, Harbet Road, London N18 3HT**	**C&I**	✓	**512**	**738**	**895**	**1,251**	**-**	~~Enfield~~	
			ENF 12	Camden Plant~~, Lower Hall Lane, Chingford~~	**Camden Plant, Lower Hall Lane, Chingford,**	**CDE**	✓	**236,950**	**232,590**	**241,900**	**216,334**	**206,806**	~~Enfield~~	
			ENF 13	Personnel Hygiene Services Ltd, Princes Road, Upper Edmonton	**10 Prices Road, Edmonton, London N18 3PR**	**C&I**	**X**	**0**	**0**	**95**	**1,004**	**1,081**	~~Enfield~~	

Ref	Page	Policy/ Paragraph	Main Modification										
			ENF 14	**Vacant (Formerly Lee valley Motors Ltd)**	**Second Avenue, Edmonton**	**C&I**	**N/A**	**0**	**0**	**0**	**0**	**0**	
			ENF 15	~~Yard 10 - 12 Hastingwood Trading Estate.~~ A&A Skip Hire Limited	**Yard 10-12, Hastingwood Trading Estate, Harbet Road, Edmonton, London N18 3HR**	**C&I**	✓ **(89%)**	**0**	**0**	**9.391**	**16,277**	**10,696**	~~Enfield~~
			ENF 17	Albert Works~~, Kenninghall Road, Edmonton~~	**Albert Works, Kenninghall Road, Edmonton, London N18 2PD**	**C&I**	✓	**193,308**	**224,020**	**233,225**	**211,424**	**-**	~~Enfield~~
			ENF 18	Edmonton Energy from Waste Facility	**Edmonton Ecopark, Advent Way, Edmonton, London N18 3AG**	**LACW**	✓	**546,402**	**526,829**	**560,685**	**550,408**	**597,134**	
				London Energy Ltd Composting	**Edmonton Ecopark, Advent Way, Edmonton, London N18 3AG**	**LACW**	✓	**32,498**	**32,779**	**35,241**	**32,475**	**33,981**	
				London Energy Bulk Waste Recycling Facility	**Edmonton Ecopark, Advent Way, Edmonton,**	**LACW**	**X**	**192,907**	**190,333**	**168,121**	**152,227**	**198,389**	

Ref	Page	Policy/ Paragraph	Main Modification										
					London N18 3AG								
				Ballast Phoenix Ltd	**Edmonton Ecopark, Advent Way, Edmonton, London N18 3AG**	**LACW**	✓	**58,255**	**106,341**	**112,419**	**109,141**	**101,189**	
			~~ENF 19~~	~~London Waste Ltd Composting, Edmonton EcoPark, Advent Way~~									~~Enfield~~
			~~ENF 20~~	~~London Waste Bulk Waste Recycling Facility, Edmonton EcoPark, Advent Way~~									~~Enfield~~
			~~ENF 20~~	~~London Waste Ltd, Edmonton EcoPark, Advent Way~~									~~Enfield~~
			~~ENF 22~~	~~London Waste Ltd, Edmonton EcoPark, Advent Way~~									~~Enfield~~
			ENF 23	J O'Doherty Haulage, Noble Road, Edmonton	**Pegamoid Site, Noble Road, Edmonton, London N18 3BH**	**C&I**	✓ **(59%)**	**85,103**	**69,124**	**64,897**	**77,305**	**88,636**	~~Enfield~~

Ref	Page	Policy/ Paragraph	Main Modification										
			ENF 24	Oakwood Plant Ltd, Edmonton	**Oakwood House, Nobel Road, Eley Industrial Estate, Edmonton, London N18 3BH**	**C&I / CDE**	✓ **(84%)**	**10,282**	**7,495**	**10,011**	**13,489**	**14,428**	~~Enfield~~
			ENF 25	Environcom Ltd **(Eedmonton Facility)**~~, Stonehill Business Park, Edmonton~~	**Unit 8a Towpath Road, Stonehill Business Park, N18 3QU**	**Hazardous (WEEE)**	✓	**2,447**	**1,327**	**9.194**	**11,040**	**67**	~~Enfield~~
			ENF 26	Powderday Plant Ltd, Jeffreys Road	**Unit 2, Jeffreys Road, Brimsdown, Enfield, Middlesex EN3 7UA**	**C&I / CDE**	✓	**27,319**	**18,664**	**48,851**	**23,490**	**49,754**	~~Enfield~~
			~~ENF 27~~	~~Edmonton EFW~~									~~Enfield~~
			ENF 30	**Hunsdon Skip Hire (Previously L&M Skips and London & Metropolitan Recycling)**	**Unit 1, 1b Towpath Road, Stonehill Business Park, London N18 3QX**	**C&I / CDE**	✓	**0**	**7,150**	**26,545**	**15,501**	**11,337**	
			ENF 31	Volker Highways Ltd	**15 Edison Road, Brimsdown Industrial Estate,**	**C&I / CDE**	✓	**-**	**8.892**	**13,652**	**7.344**	**-**	

Ref	Page	Policy/ Paragraph	Main Modification										
					Enfield EN3 7BY								
			~~ENF 32~~	~~Guy Lodge Farm~~									~~Enfield~~
			~~ENF 33~~	~~Ballast Phoenix Ltd~~									~~Enfield~~
			~~ENF 34~~	~~London & Metropolitan Recycling Facility~~									~~Enfield~~
			ENF 35	**Redcorn (ELV)** ~~Unit 25 Enfield Metal Kingswood Nursery, Theobalds Park Road~~	**22a & 24 Stacey Avenue, Montague Industrial estate, Enfield N18 3PS**	**Hazardous (C&I)**	✓	**-**	**-**	**-**	**-**	**6,557**	~~Enfield~~
			~~ENF 36~~	~~Greenstar Environmental~~									~~Enfield~~
			ENF 37	GBN	**Gibbs Road, Montague Industrial Estate, London N18 3PU**	**CDE**	✓						
			HAC 1	Millfields Waste Transfer & Recycling Facility	**Millfields Recycling Facility, Millfields Road, Hackney, London E5 0AR**	**LACW**	**X**	**18,202**	**13,935**	**14,173**	**16,785**	**16,725**	~~Hackney~~
			HAC 2	Downs Road Service Station ~~(Brydon Motor~~	**1A Downs Road, Clapton,**	**C&I**	✓	**177**	**175**	**96**	**101**	**-**	~~Hackney~~

Ref	Page	Policy/ Paragraph	Main Modification										
				~~Company Clapton)~~	**London E5 8QJ**								
			~~HAR 1/2~~	Hornsey Central Depot, Haringey LBC									~~Haringey~~
			HAR 3	**Biffa Waste Services** Ltd, Garman Road, Tottenham	**81 Garman Road, Tottenham, London N17 0UN**	**C&I**	✓	**28,851**	**30,355**	**34,690**	**33,704**	**37,454**	~~Haringey~~
			HAR 4	O'Donovan, Markfield Road, Tottenham	**100a Markfield Road, Tottenham, London N15 4QF**	**C&I / CDE**	✓ **(50%)**	**6,316**	**10,099**	**11,143**	**7,035**	**14,693**	~~Haringey~~
			HAR 5	Redcorn Ltd, White Hart Lane, Tottenham	**44 White Hart Lane, Tottenham, London N17 8DP**	**C&I**	✓	**15,712**	**22,733**	**23,852**	**8,508**	**-**	~~Haringey~~
			HAR 6	Restore Community Projects~~, Ashley Road, Tottenham~~	**Unit 18, Ashley Road, Tottenham, London N17 9LJ**	**C&I**	✓	**24**	**103**	**185**	**278**	**98**	~~Haringey~~
			HAR 7	Redcorn **Ltd, Brantwood Road** ~~/ Brantwood Auto Recycling Ltd, Willoughby Lane~~	**Brantwood Road, Tottenham, London N17 0ED**	**C&I**	✓	**2,470**	**5,225**	**2,250**	**23,779**	**39,283**	~~Haringey~~
			HAR 8	O'Donovan~~, Markfield~~	**82 Markfield**	**CDE**	✓	**5,079**	**27,330**	**31,460**	**25,674**	**123,308**	~~Haringey~~

Ref	Page	Policy/ Paragraph	Main Modification											
				~~Road,~~ ~~Tottenham~~	**Road, Tottenham, London N15 4QF**									
			HAR 9	Par View Road Reuse and Recycling centre	**Civic Amenity Site, Park View Road, Tottenham, London N17 9AY**	**LACW**	**X**	**3,706**	**2,409**	**6,326**	**5,499**	**5,745**	~~Haringey~~	
			HAR 10	~~London Waste Ltd,~~ Western Road **Re-use and Recycling Centre** ~~HWRC~~	**Western Road, Haringey N22 6UG**	**LACW**	**X**	**0**	**0**	**2,526**	**4,851**	**3,799**	~~Haringey~~	
			HAR 11	**Durnford Street Car Dismantlers & Breakers**	**6-40 Durnford Street, Tottenham, London N15 5NQ**	**C&I**	✓	**0**	**0**	**0**	**432**	**288**		
			ISL 1	Hornsey Household Re-use & Recycling Centre **and Transfer Station**	**Hornsey street, Islington, London N7 8HU**	**LACW**	**X**	**196,818**	**195,018**	**203,919**	**204,496**	**212,232**	~~Islington~~	
			WAF 1	**Mercedes Parts Centre**	**21 Chingford Industrial Estate, Hall Lane, Chingford, London E4 8DJ**	**C&I**	✓	**0**	**0**	**0**	**0**	**7**		

Ref	Page	Policy/ Paragraph	Main Modification										
			WAF 2	Kings Road Household Waste Recycling Centre	**Civic Amenity Site, 48 Kings Road, Chingford, London E4 7HR**	**LACW**	**X**	**1,213**	**881**	**2,178**	**2,400**	**2,853**	~~Waltham Forest~~
			WAF 3	South Access Road Household Waste Recycling Centre	**42a South Access Road, Walthamstow, London E17 8BA**	**LACW**	**X**	**2,917**	**2,784**	**6,790**	**6,949**	**7,203**	~~Waltham Forest~~
			~~WAF 4~~	~~GBN Services, Estate Way, Leyton~~									~~Waltham Forest~~
			WAF 5	**Vacant (previously** T J Autos (UK) Ltd)	**17 Rigg Approach, Leyton, London E10 7QN**	**C&I**	✓	**53**	**53**	**81**	**21**	**11**	~~Waltham Forest~~
			~~WAF 6~~	~~BJ Electronics, Ravenswood Road Industrial Estate, Walthamstow~~									~~Waltham Forest~~
			WAF 8	Leyton Reuse & Recycling Centre	**Gateway Road, Leyton, London E10 5By**	**LACW**	**X**	**2,164**	**2,255**	**2,564**	**3,003**	**2,589**	~~Waltham Forest~~
			WAF 9	**Vacant (formerly BD & G parts for Rover)**	**Roxwell Trading Park, Leyton**	**C&I**	**-**	**0**	**0**	**0**	**0**	**0**	

Ref	Page	Policy/ Paragraph	Main Modification

WAF 10	Malbay Waste Disposal Ltd, Staffa Road, Leyton	**5 Staffa Road, Leyton, London E10 7PY**	**C&I / CDE**	✓	**6,700**	**10,682**	**12,624**	**7,339**	**9,925**	~~Waltham Forest~~	
WAF 1**2**~~1~~	Argall Metal Recycling Baseforce ~~Metals, Unit 1, Staffa Road, Leyton~~	**Unit 1, Staffa Road E10 7PY**	**C&I**	✓	**0**	**21,537**	**31,603**	**30,378**	**0**	~~Waltham Forest~~	
WAF 14	Tipmasters	**15 Rigg Approach, London E10 7QN**	**C&I**	**X**	**0**	**0**	**586**	**2,847**	**3,622**	~~Waltham Forest~~	
~~WAF 15~~	~~Bits and Parts~~									~~Waltham Forest~~	
WAF 16	**Whipps Cross Hospital Clinical Waste Treatment Facility**	**Whipps Cross Hospital, Whipss Cross Road, London E11 1NR**	**C&I (clinical)**	**X**	**0**	**0**	**0**	**0**	**5**		

[footnote to BAR3, BAR4, BAR6 and BAR7**]**

These sites will be redeveloped under the ~~approved~~ planning permission for the regeneration of Brent Cross Circklewood (Barnet planning application reference F/04687/13). The Hendon Rail Transfer Station (BAR 4) will be replaced ~~as part of the BXC development~~ with a new facility ~~on site S01 BA~~ to meet the NLWA's requirements. **Planning permission for a new Waste Transfer Station (WTS) at Geron Way was granted by Barnet Council in September 2018.** The existing **commercial** facilities at BAR 6 and BAR 7 fall within the land required to deliver the ~~first~~ **early** Southern phase of the BXC regeneration ~~which is anticipated will~~ **has** commence**d; replacement capacity for these sites will be sought in accordance with the**

Ref	Page	Policy/ Paragraph	Main Modification
			planning permission for Brent Cross Cricklewood. ~~in early 2018. Replacement capacity for these sites will not be provided prior to their redevelopment and therefore replacement capacity will be sought outside of the BXC regeneration area on alternative sites / areas to be identified within the London Borough of Barnet.~~ **The BAR3 site is identified for redevelopment in Phase 4 of the BXC regeneration. It is planned that capacity at the waste facilities of BAR4, BAR6 and BAR7 and part of the capacity of BAR3 will be replaced by the new Waste Transfer Station (WTS) delivered as part of the Brent Cross Cricklewood Regeneration. The balance of the replacement capacity for BAR3 would need to be identified prior to its redevelopment and the London Borough of Barnet will seek to provide replacement capacity within the borough. The Barnet Local Plan will identify potential sites.**

Ref	Page	Policy/ Paragraph	Main Modification
MM105b		HAR 7	[Revision to safeguarded area for HAR 7 in Haringey's Policies Map]

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			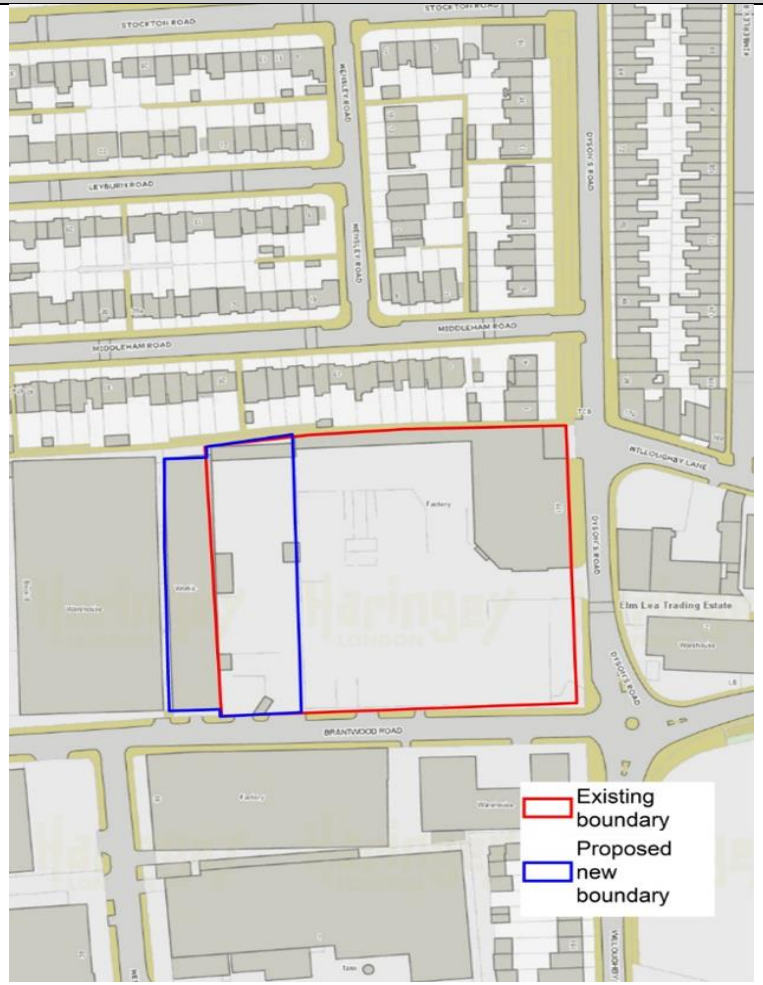

<table>
<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td>MM106</td><td></td><td>Appendix 2: Barnet Area Profiles</td><td>A05-BA Connaught Business Centre
<table><tr><td>Historic Environment</td><td><s>No assets identified in vicinity.</s> Within Watling Street Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</td></tr></table></td></tr>
<tr><td>MM107</td><td></td><td>Appendix 2: Enfield Area Profiles</td><td>12-EN Eleys Estate, Enfield
<table><tr><td>Historic Environment</td><td>Historic England commented that development should avoid harm to the historic environment and the setting of Chingford Mill Pumping Station (grade II) should be considered<s>. The potential archaeology value of area should be considered</s> along with the setting of Montagu Road Cemeteries Conservation Area.
Within the Lea Valley West Bank Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</td></tr></table></td></tr>
<tr><td>MM108</td><td></td><td>Appendix 2: Hackney Area Profiles</td><td>A15-HC Millfields LSIS
<table><tr><td>Historic Environment</td><td>There are three Grade II listed buildings adjacent to the west of site:
Hackney Borough Disinfecting Station (on Heritage at Risk Register)
Shelter House
Caretakers Lodge</td></tr></table></td></tr>
</table>

<table>
<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td></td><td>The Mandeville Primary School which is Grade II listed is situated to the south of the area.

Historic England has commented that any development within the area located to the east and north of these assets must address their long term conservation needs in a comprehensive manner.

Within Lea Valley Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</td></tr>
</table>
</td></tr>
<tr><td>MM109</td><td></td><td>Appendix 2: Hackney LLDC Area Profiles</td><td>
LLDC1-HC Bartrip Street
<table>
<tr><td>Flood Risk</td><td><s>Part of the southern area of Bartip St LSIS is within Flood Zone 2 (medium risk) although the area benefits from flood defences. The area is at risk from surface water flooding.</s>

The site area is largely within Flood Zone 1 with the southern most part falling partially within Flood Zones 2 and 3, noting that the Flood Zone 3 is within an area benefiting from defence. The proposed use for the site is considered to be ‘Less Vulnerable’. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.

The site area is shown to flood from the River Lea / Lee Navigation in the 1% AEP event (without defences) and this will potentially increase in the future as a result of climate change with 1% AEP event covering a greater extent of the site. The River Lea / Lee Navigation benefits from defences</td></tr>
</table>
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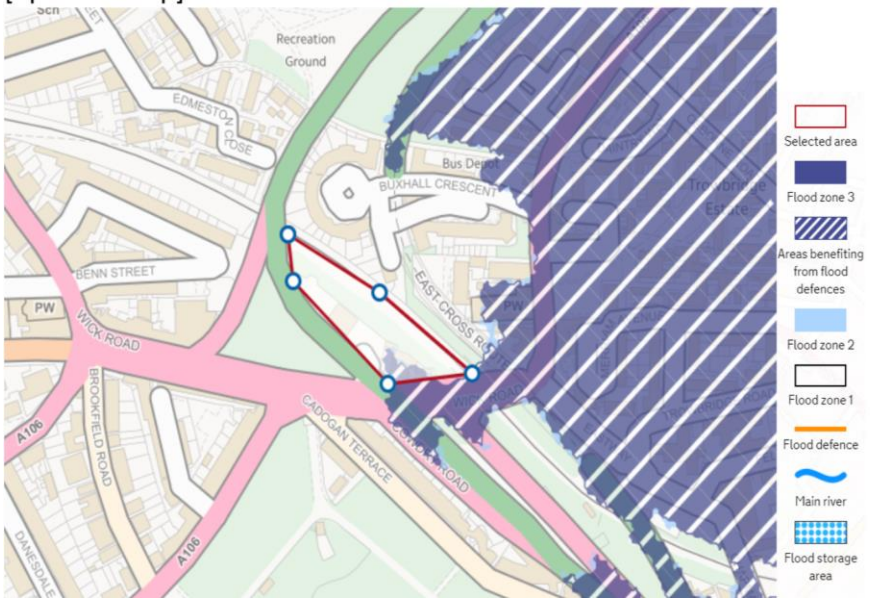
</table>

Ref	Page	Policy/ Paragraph	Main Modification		
				and a site-specific flood risk assessment should consider how much these benefit the site area. **A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.** **Part of the site area benefits from existing flood defences.** Part of the site area benefits from existing flood defences. [updated map] 	

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<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td>MM110</td><td></td><td>Appendix 2: Hackney LLDC Area Profiles</td><td>LLDC2-HC Chapman Road (Palace Close)

<table><tr><td>Flood Risk</td><td><s>Flood Zone 2 (Medium probability of flooding) however the area benefits from flood defences.</s>
<s>The area is at risk from surface water flooding.</s>

The site area falls partially within Flood Zone 1 and 2 but is largely in Flood Zone 3, noting that this is within an area benefiting from defences. The proposed use for the site is considered to be ‘Less Vulnerable’. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.

The site area is shown to flood from the River Lea / Lee Navigation in the 1% AEP event (without defences) and this will potentially increase in the future as a result of climate change with 1% AEP event covering a greater extent of the site area. The River Lea / Lee Navigation benefits from defences and a site-specific flood risk assessment should consider how much these benefit the site area.
A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.

The majority of the site area benefits from existing flood defence.</td></tr></table></td></tr>
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<tr><td></td><td></td><td></td><td>
<table>
<tr><td></td><td>[updated map]
</td></tr>
</table>
</td></tr>
<tr><td>MM111</td><td></td><td>Appendix 2: Haringey Area Profiles</td><td>A19-HR Brantwood Road
<table>
<tr><td>Flood Risk</td><td><s>The eastern section of the area lies within Flood Zone 2 (medium probability of flooding).</s>
<s>The area is at risk from surface water flooding.</s>

The site area is largely Flood Zone 1 with the western most part of the site area falling partially within Flood Zone 2. The proposed use for the site is considered to be ‘Less Vulnerable’. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.</td></tr>
</table>
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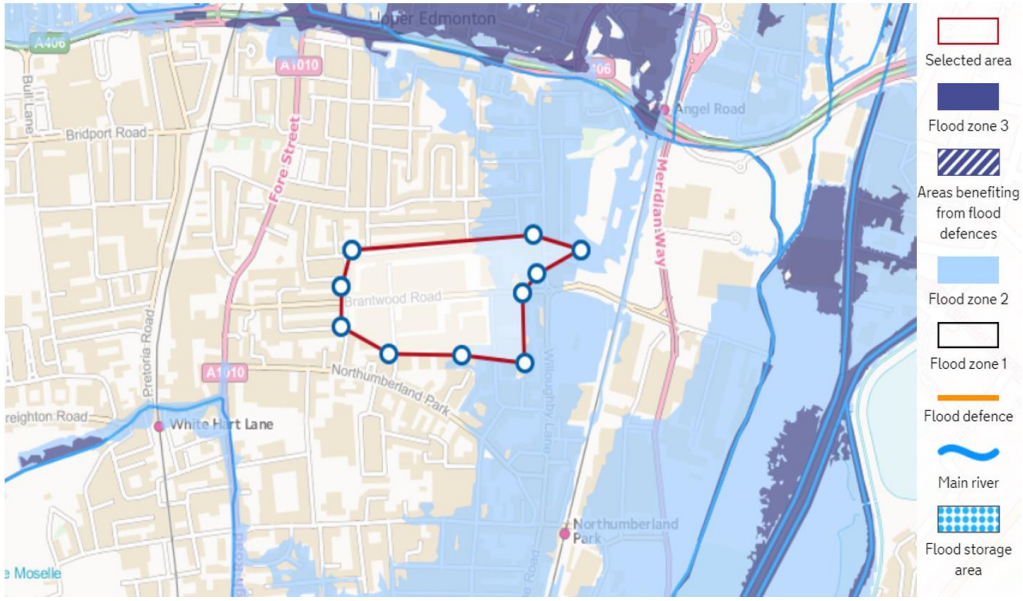
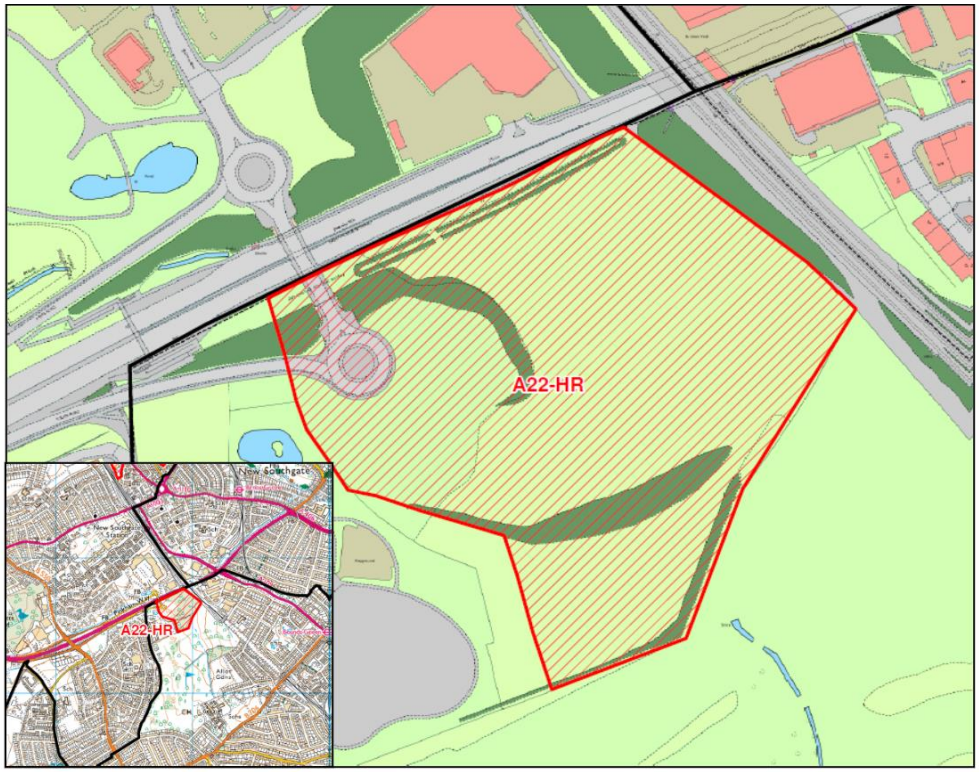
</table>

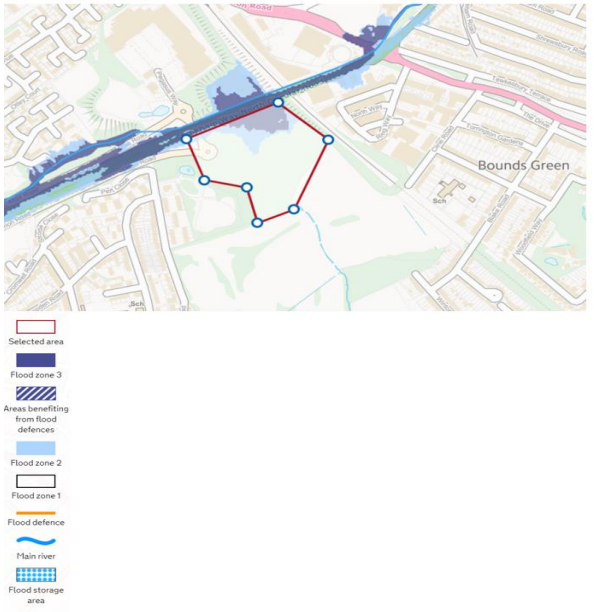
Ref	Page	Policy/ Paragraph	Main Modification	
				The site area is shown to flood from the Pymmes Brook in the 0.1% AEP event (without defences) and this will increase in the future as a result of climate change with 1% AEP event to cover approximately one quarter of the site area. **A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.** [updated map] 
MM112		Appendix 2: Haringey Area Profiles	A21-HR North East Tottenham Historic Environment	~~No assets identified in vicinity.~~ **Within the Lee Valley Archaeological Priority Area. Historic England commented that**

Ref	Page	Policy/ Paragraph	Main Modification
			there is potential for archaeological remains to be present and that further assessment should be undertaken.
MM113		Appendix 2: Haringey Area Profiles	A22-HR Pinkham Way **A22-HR – Friern Barnet Sewage Works (LEA 4)/ Pinkham Way, Haringey**  © Crown Copyright and database right (2016). Ordnance Survey 100021551

Ref	Page	Policy/ Paragraph	Main Modification

Area Details	
Borough	Haringey
Type of Location	Area
Location Reference	A22-HR – Friern Barnet Sewage Works (LEA 4) /Pinkham Way
Size	5.95ha
Area Description	Land is currently unused and has become over grown with trees and vegetation.
Description of surrounding uses	Pinkham Way and retail park to north, industrial properties east. Golf course south and a park and residential properties to the west.
Planning Information	
Planning Designation	The Area is designated a Local Employment Area (LEA) and a Borough SINC.
Relevant Local Plan Policy	**Former Friern Barnet Sewage Works / Pinkham Way Area has the following planning designations on the site: Site of Importance for Nature Conservation Grade 1, Local Employment Area: Employment Land, Flood Zone 2 and 3 (part).** **The area is subject to the following key Local Plan policies: - SP13: Open Space and Biodiversity, DM 20: Open Space and Green Grid, SP8: Employment, DM 37: Maximising the Use of Employment Land and Floorspace, and DM 24: Managing and Reducing Flood Risk.** ~~The Area is subject to Local Plan policy SP8: Employment. Friern Barnet site falls within the Borough's Specific Proposal 5, Employment generating uses subject to no adverse effect on the nature conservation value of the site.~~

Ref	Page	Policy/ Paragraph	Main Modification	
				~~The area is subject to policy SP13: Open Space and Biodiversity. Friern Barnet is allocated as Borough Grade 1 SINC, and for employment uses in the Local Plan.~~
			Land Use	
			Co-location	This Area would allow for co-location with complementary activities due to its size and highway accessibility.
			Major New Developments	None identified locally
			Decentralised Energy Network	The Enfield potential Decentralised Energy area lies approximately 65m northeast of Friern Barnet. Not considered to be a practical option due to distance from potential users. Friern Barnet is in an area of low energy consumption (as ~~site~~ **Area** undeveloped). Areas northeast, east and west of ~~site~~ **Area** are high energy consumption zones.
			Details of in-situ infrastructure	None identified
			Constraints	
			Flood Risk	~~North boundary and northeast corner of the area is within Flood Zone 2 (medium probability of flooding).~~ ~~Any development on the area will increase impermeable surfaces and therefore increases surface water runoff which would need to be managed. It is understood that historical use of the area may have left contamination. It is unknown whether or not this previous use has an impact on the quality of groundwater. This could be ascertained through any planning application which may offer the opportunity to provide appropriate remediation.~~ **The** ~~site~~ **Area is largely within Flood Zone 1 with an area to the north of the** ~~site~~ **Area falling partially within Flood Zones 2 and 3. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report**

Ref	Page	Policy/ Paragraph	Main Modification	
				and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable. **Part of the ~~site~~ Area is shown to flood from the Bounds Green Brook in the 1% AEP event (without defences) and this will potentially increase in the future as a result of climate change with 1% AEP event covering a greater extent of the site Area.** **A site specific flood risk assessment will therefore be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.** [updated map] 

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Surface and Groundwater	Not within a Source Protection Zone or ~~principle~~ **principal** aquifer. Bounds Green Brook lies approximately 40m north of ~~site~~ **Area**. A pond lies approximately 10m west of ~~site~~ **Area** and unnamed water course lies approximately 20m south of ~~site~~ **Area**.
Land Instability	The Environment Agency records historic landfilling in the area. This may represent a ground stability issue and as such further investigation will be required at the planning application stage.
Sensitive Receptors (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Residential properties lie west of Friern Barnet. Given the scale of the area there is scope to create a buffer around any waste management facility and orientate the facility away from residents.
Nature Conservation	Area is within a Borough Site of Importance for Nature Conservation which includes the adjacent Park and Golf Club. A number of ecology surveys have been undertaken and identified habitat of "potential value to a number of protected and notable species". **There is an ecological corridor to the east of the area along the railway embankment.** Japanese Knotweed and Giant Hogweed have been identified in abundance across ~~site~~ **Area**. There is currently no active management of the SINC.
Green Belt and Open Space	Land adjacent to the south and west of the area is designated as Metropolitan Open Land.
Historic Environment	No features identified
Highways	The Area would require the creation of an access to the roundabout on Orion Road/Pegasus Way. This would need to be designed to allow HGVs and refuse vehicles. The existing roundabout is suitable for these movements. Access to the North Circular is relatively easy from either Orion Road [heading east] or from Pegasus Way [to head west]. The Colney Hatch Lane/North Circular Road junction suffers from congestion at peak times. Use of the ~~site~~ **Area** for waste would add to HGV/refuse vehicle movement but is unlikely to have a significant impact on the

Ref	Page	Policy/ Paragraph	Main Modification	
				operation of this junction, based on 60 in/out movements per day for refuse vehicles plus 40 bulk transport in/out movements.
			Conclusion	
			Potential Uses	~~Integrated resource recovery facilities/resource parks, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment~~ Waste transfer, ~~processing and~~ **R**~~r~~ecycling, ~~indoor c~~**C**omposting, **including indoor** in-vessel composting and outdoor composting. ~~Thermal Treatment facilities may be viable but should only be considered if a combined heat and power facility could be incorporated into the facility and linked up to a district heating system.~~ Areas not lying within Flood Zone 3 are potentially suitable to handle hazardous waste.
			Uses unlikely to be suitable	N/A
			Potential mitigation measures	**The Area covers land owned separately by the North London Waste Authority and the London Borough of Barnet.** There are a number of **policy**, environmental and amenity issues facing this area, although it previously accommodated a sewage treatment works. **The Area** has revegetated, contains a number of mature trees and is designated as a SINC. **Due to the number of designations affecting this Area, only a proportion of the overall area will be suitable for development. Given the land is in two ownerships and Barnet has no current plans to develop a waste facility, this is likely to impact on the deliverability of the site in its entirety. A smaller part of the site area in NLWA's single ownership is therefore most likely to accommodate any development. The location of new development within the Area will be assessed against flood risk criteria in the NPPF and a site-specific flood risk assessment will be required. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where**

Ref	Page	Policy/ Paragraph	Main Modification	
				development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. **Given the constraints on the Area, the site footprint should be minimised, taking into account the necessary operational elements of a waste facility, for example space for turning and parking for waste vehicles, processing area with sufficient room for equipment for waste treatment, and areas for the storage and stockpiling of materials. This should be on level areas where feasible.** **The location of new development should take the opportunity to create an appropriate buffer zone between the proposed facility and nearby sensitive receptors, including residential properties.** **Any new waste facility in this Preferred Location will need to be in line with the Haringey's Local Plan and the London Plan. There are community concerns around the development of a waste facility within this Area and how this will affect the natural environment, flood risk and biodiversity in the Area. Specific policy considerations on this topic are set out below. Consultation with the local community will be required for any proposed waste facility on this site.** **In line with London Plan policy G6: 'Biodiversity and access to nature', development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. In line with London Plan policy G7: 'Trees and Woodland', development proposals should ensure that, wherever possible, existing trees of value are retained.**

Ref	Page	Policy/ Paragraph	Main Modification	
				In line with Local Plan policy DM19: 'Nature Conservation', development proposals should protect and enhance the nature conservation value of the area. Development that has a direct or indirect adverse impact upon important ecological assets will only be permitted where the harm cannot be reasonably avoided and it has been suitably demonstrated that appropriate mitigation can address the harm caused. **In line with London Plan Policy G6D, any development needs to achieve biodiversity net gain that leaves the biodiversity in a better state than before the development. This should be outside the areas at risk of flooding (Zone 2 and 3), suitably buffered from the ecological corridor to the east of the area, and subject to up-to-date Biodiversity and Wildlife surveys, be on land that is not identified as having priority species or habitats.** **An appropriate ecological survey will be required to identify significant ecological features to retain or replace. Consideration should be given to the retention and protection of existing mature trees and the designation and management of appropriate areas of habitat to be retained and enhanced.** **Mitigation measures should include continued habitat connectivity with the adjacent green spaces and ecological corridor along the railway embankment that needs to be retained and enhanced.** ~~Incorporating appropriate boundary treatments / landscaping, protecting existing green infrastructure features, undertaking appropriate ecological surveys and creating replacement habitat are likely to be important mitigation measures~~.

Ref	Page	Policy/ Paragraph	Main Modification	
				In line with Local Plan policy DM21: 'Sustainable Design, Layout and Construction', buildings within the development should be designed to complement nature conservation by maximising opportunities to enhance biodiversity, including through appropriate landscaping, Sustainable Drainage Systems, living roofs and green walls. Mitigation measures would be required to protect the amenity of sensitive receptors including hours of working, noise and odour suppression. ~~Consideration should also be given to the creation of an appropriate buffer between waste management facility and nearby sensitive receptors.~~ Provision of an acceptable access ~~of~~ **from** Orion Road Roundabout would be required. **Any application should demonstrate how public access to the remainder of the Area could be achieved.** **The Muswell Hill Golf Course Brook runs in culvert through the Pinkham Way Priority Area. Opening up the watercourse could bring multiple flood risk, biodiversity and amenity benefits and should be given consideration as site-specific development proposals are advanced.** **Any application will need to have regard to the needs of different users of the Area to ensure the safe operation of the waste management facility.** A contamination and ground stability appraisal would be required to assess potential impacts from the historic landfill within the Area boundary.

Ref	Page	Policy/ Paragraph	Main Modification	
				As parts of the Area **fall within flood Zone 2 and 3** ~~are at a medium risk of flooding~~, the completion of a suitable Flood Risk Assessment and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures. **Any necessary SuDS should be designed to integrate with other nature conservation elements.** ~~For any proposed development which involves an increase in built footprint within the modelled extent of the 1 in 100 chance in any year flood event, taking the impacts of climate change into account, or where the footprint has been moved into a deeper area of floodplain than the existing built footprint, floodplain compensation will need to be provided on a volume for volume and level for level basis.~~
MM114		Appendix 2: Waltham Forest Area Profiles	A24-WF Argall Avenue	
			Historic Environment	~~No assets identified in vicinity.~~ **Within the River Lea and Tributaries Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.**
			Flood Risk	~~The north of the area lies with Flood Zone 2 and 3 (medium to highest probability of flooding) with the southern tip lying within Zone 2. A flood storage area lies adjacent to the east of the northeast corner of the area.~~ ~~Facilities within Flood Zone 3 should only deal with inert waste unless otherwise agreed with the Environment Agency.~~ **The site area falls partially within Flood Zone 1, Flood Zone 2 and Flood Zone 3. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential**

Ref	Page	Policy/ Paragraph	Main Modification	
				Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable. **However, development should be avoided on the part of the site area which lies within the functional floodplain.** **The site area is shown to flood from the River Lee and Dagenham Brook in the 1% AEP event (without defences) and this will potentially increase with the future as a result of climate change with 1% AEP event covering a greater extent of the site area.** **A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.** **For any proposed development which involves an increase in built footprint within the modelled extent of the 1 in 100 chance in any year flood event, taking the impacts of climate change into account, or where the footprint has been moved into a deeper area of floodplain than the existing built footprint, floodplain compensation will need to be provided on a volume-for-volume and level-for-level basis.**

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 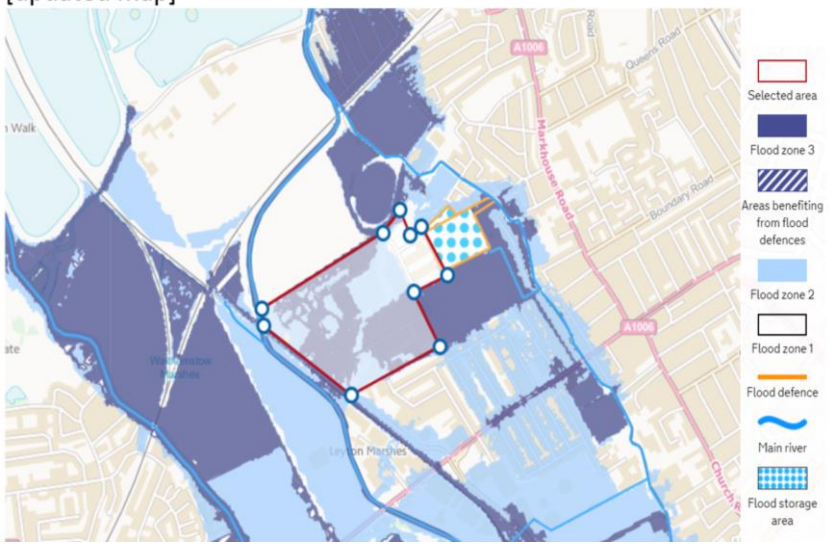
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<tr><td>MM115</td><td></td><td>Appendix 2: Waltham Forest LLDC Area Profiles</td><td>LLDC3-WF Temple Mill Lane
<table>
<tr><td>Historic Environment</td><td><s>No assets identified in vicinity</s>. Within the River Lea and Tributaries Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</td></tr>
<tr><td>Flood Risk</td><td><s>The majority of the site lies within Flood Zone 3 (highest probability of flooding). Parts of the eastern half of the area lie within Flood Zone 2 (medium probability of flooding).</s>
<s>Environment Agency – Facilities within Flood Zone 3 should only deal with inert waste unless otherwise agreed with the Environment Agency.</s></td></tr>
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Ref	Page	Policy/ Paragraph	Main Modification	
				The site area is largely Flood Zone 2 with a small area of Flood Zone3. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable. **The site area is shown to flood from the River Lee and Dagenham Brook in the 1% AEP event (without defences) and this will potentially increase with the future as a result of climate change with 1% AEP event covering a greater extent of the site area.** **A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.** **For any proposed development which involves an increase in built footprint within the modelled extent of the 1 in 100 chance in any year flood event, taking the impacts of climate change into account, or where the footprint has been moved into a deeper area of floodplain than the existing built footprint, floodplain compensation will need to be provided on a volume-for-volume and level-for-level basis.**

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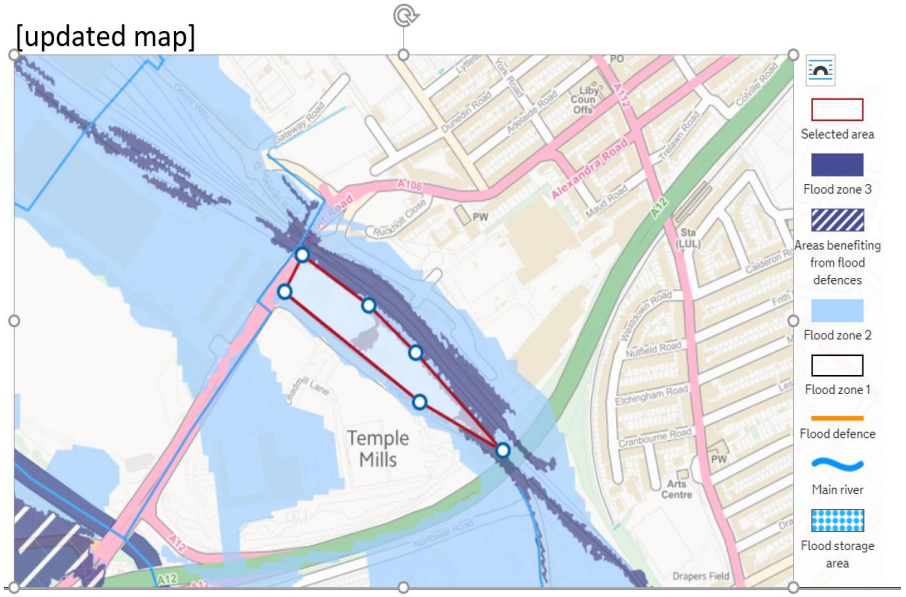
			[updated map] 

nlwp
north london waste plan

North London Waste Plan

Adopted 2022

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1 Introduction and Background

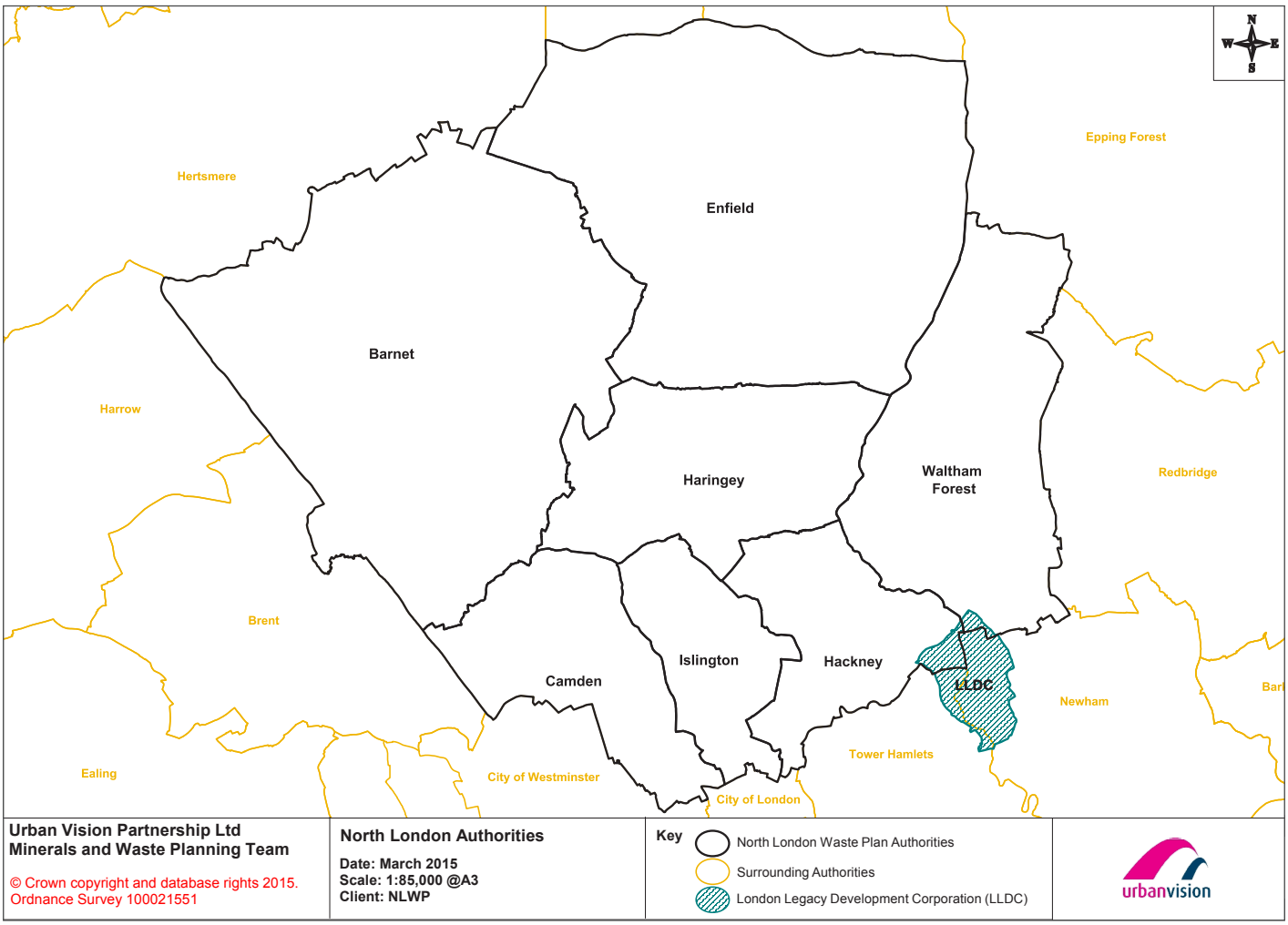
1 Introduction and Background

1.1 North London covers a large swathe of London from the inner city into the Green Belt of outer London. The geographical extent takes in both the inner London Boroughs of Camden, Hackney and Islington, and the outer London Boroughs of Barnet, Enfield, Haringey and Waltham Forest (see *Figure 1*). The land within the North London Boroughs spans an area of 293 square kilometres.

What is the North London Waste Plan?

1.2 The seven North London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest are working together to produce the North London Waste Plan (the 'NLWP'). The NLWP also covers part of the area of the London Legacy Development Corporation (LLDC), a Mayoral Development Corporation, which is the planning authority for a small part of Hackney and Waltham Forest. *Figure 1* shows the North London Waste Plan area.

Figure 1: **North London Plan Area**



1.3 The NLWP has two main purposes:

- to ensure there will be adequate provision of suitable land to accommodate waste management facilities of the right type, in the right place and at the right time up to 2036 to manage waste generated in North London; and
- to provide policies against which planning applications for waste development will be assessed, alongside other relevant planning policies/guidance.

1 Introduction and Background continued

1.4 The key elements of the NLWP are:
The Aim and Strategic Objectives: These are overarching principles which have steered the development of the NLWP.

The Spatial Principles: The spatial principles flow from the Strategic Objectives and provide the strategic direction for the detailed policies of the NLWP and inform site/area selection. They reflect the physical and planning components that influence the Plan and guide the identification of opportunities and constraints for waste planning in North London.

The Provision for North London's Waste to 2036: This sets out the preferred option for how the waste management needs for North London will be met for each waste stream over the Plan period.

The Policies: These are strategic policies through which the aims and objectives, waste management strategy and Spatial Principles will be delivered. The policies provide the waste planning framework against which applications for waste development will be assessed across the Plan area.

1.5 The NLWP plans for all principal waste streams including:
- **Local Authority Collected Waste (LACW):** Waste collected by a Local Authority, including household and trade waste;
- **Commercial & Industrial (C&I):** Waste produced by businesses and industry;
- **Construction, Demolition & Excavation (CD&E):** Waste generated as a result of delivering infrastructure projects, building, renovation and the maintenance of structures;
- **Hazardous:** A sub category of all waste streams where the material produced is hazardous and requires specialist treatment;
- **Agricultural Waste:** Waste produced by farming and forestry activity;
- **Waste Water/Sewage Sludge:** Waste produced from washing, cleaning and hygienic activities to create waste water and sewage effluents; and
- **Low Level Radioactive Waste (LLW):** Waste associated with the undertaking of x-rays and laboratory testing using low level radioactive substances.

How Does the North London Waste Plan Fit with Other Plans and Strategies?

1.6 The seven North London Boroughs, as Waste Planning Authorities (WPA) are required to prepare a Waste Local Plan. This requirement comes from Article 28 of the European Union (EU) Waste Framework Directive, the National Waste Management Plan for England and the National Planning Policy for Waste (NPPW).

1.7 The NLWP is prepared in line with the requirements of the Planning and Compulsory Purchase Act 2004, the Waste (England and Wales) Regulations 2011 and the Town and Country Planning (Local Planning) (England) Regulations 2012. The National Planning Policy Framework (NPPF) and supporting Planning Practice Guidance (PPG) direct how Local Plans should be prepared and the National Planning Policy for Waste (NPPW) provides detailed requirements specific to waste plan preparation and content.

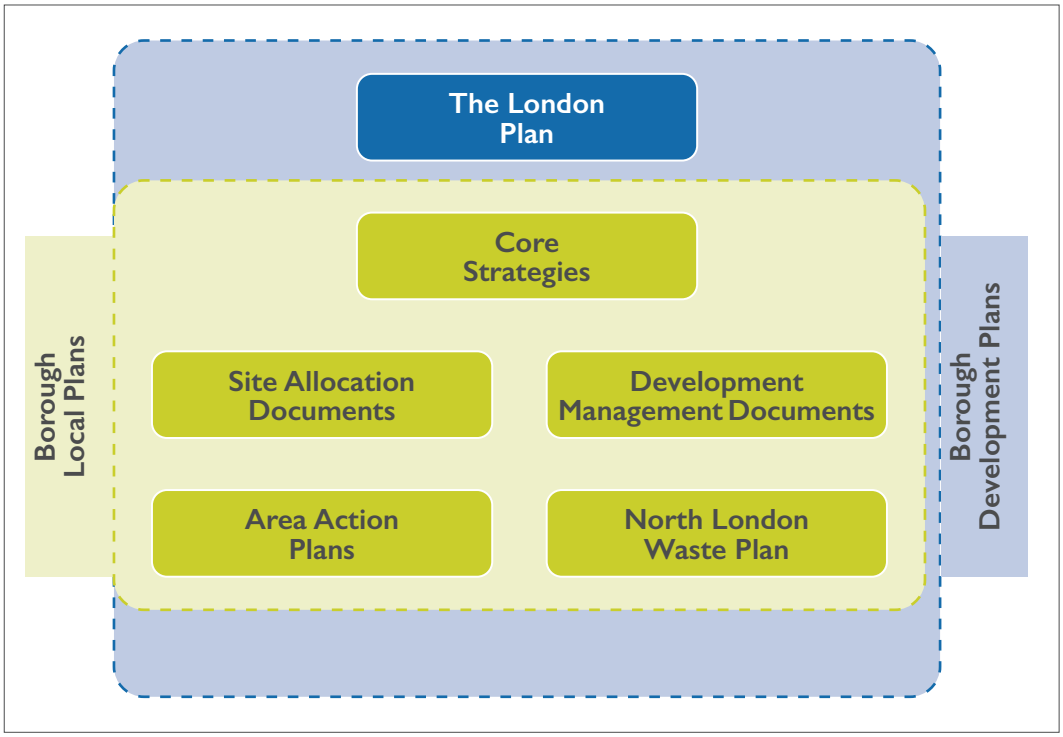
1.8 Once adopted, the NLWP will form part of the 'Development Plan' for each of the North London Boroughs which comprises the London Plan and borough Local Plans (see *Figure 2*). The NLWP must be in general conformity with the London Plan, which sets the strategic framework for the NLWP, and consistent with other documents in borough Local Plans. The NLWP should be read alongside other relevant policies within the wider Development Plan. The Mayor published a draft London Plan for consultation in December 2017. The Examination in public took place in early 2019 with publication of a new London Plan in March 2021.

1 Introduction and Background continued

1.9 The London Plan projects how much LACW and C&I waste is likely to be generated in the capital over the next 20 years and apportions an amount of these two waste streams to each borough. The North London Boroughs have pooled their apportionments and will meet this collectively through existing sites and land allocated in the NLWP.

1.10 Each of the seven boroughs has a strategic waste policy as part of their Local Plan. The boroughs' strategic waste policies defer to the NLWP to provide a more detailed planning framework for waste development across the seven boroughs. Each borough's Local Plan may also include site allocation documents, development management policies and area action plans, as well as supplementary planning documents.

Figure 2: **Documents Making up the Development Plan for North London Boroughs**

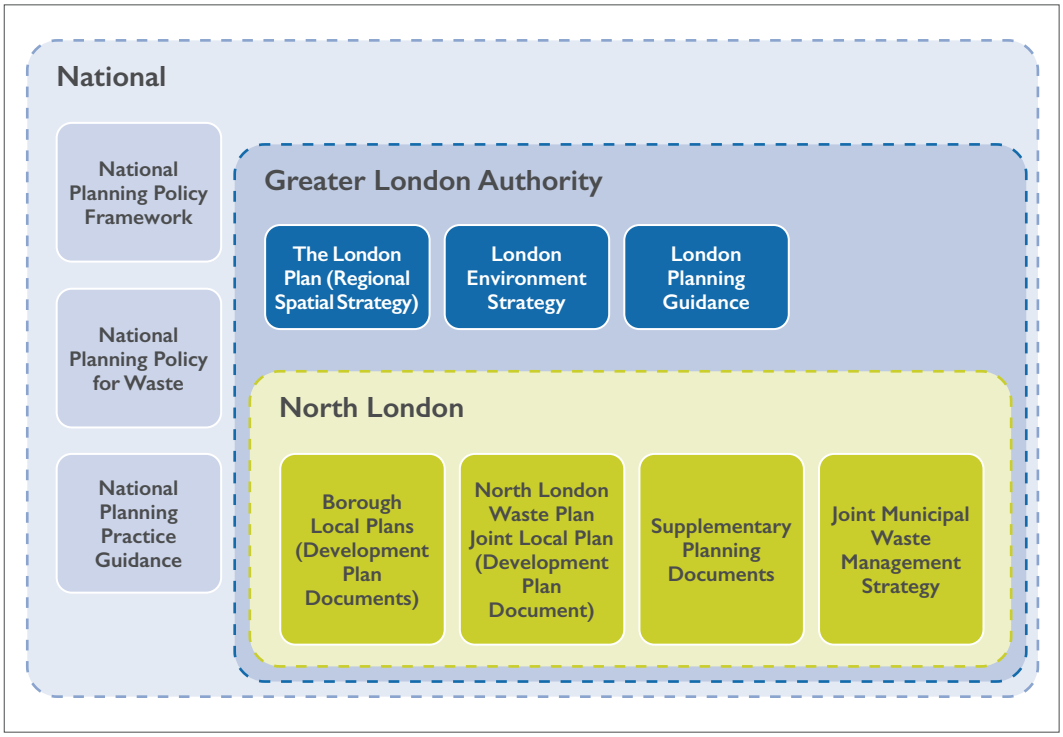


1.11 In addition to the national and regional planning policies, there are also waste strategies which impact on the development of the NLWP. The Mayor's London Environment Strategy (2018) contains recycling targets for Local Authority Collected Waste (LACW) and Commercial & Industrial (C&I) waste which inform policies within the London Plan.

1.12 The North London Waste Authority (NLWA) and the seven constituent boroughs have produced the Joint Municipal Waste Management Strategy (JMWMS) (2009). The NLWA, as the Waste Disposal Authority for the NLWP area, is a key stakeholder. The NLWA is responsible for managing the household waste collected by the North London boroughs, and also for the household waste deposited at Reuse and Recycling Centres and some waste that the boroughs collect from local businesses; collectively this is known as Local Authority Collected Waste (LACW). The NLWP is required to ensure there is adequate provision for the disposal and recovery of this waste stream.

1 Introduction and Background continued

Figure 3: **Hierarchy of Planning Guidance Policies and Strategies**



1.13 Once adopted the NLWP will form part of the overarching planning framework used for the determination of planning applications relating to proposed or existing waste facilities in North London. These applications will be submitted to the Boroughs in which the facility is located. Developers will need to consider the documents highlighted in *Figure 3* in making a planning application related to an existing or proposed waste facility:

- National planning policy and guidance;
- The London Plan and London Planning Guidance;
- The North London Waste Plan;
- Borough Local Plan and Supplementary Planning Documents.

What is Involved in Preparing the North London Waste Plan?

1.14 As mentioned above, the NLWP must be prepared in line with European, national, regional and local policies and guidance. Before the NLWP can be adopted by each of the Boroughs it must be examined by an independent Inspector. The Inspector will determine whether the Plan has been prepared in accordance with the duty to co-operate, legal and procedural requirements and whether it is 'sound'.

1.15 The duty to co-operate, introduced by the Localism Act 2011, requires local planning authorities and other public bodies to engage constructively, actively and on an ongoing basis to develop strategic policies. Meeting the requirements of the duty to co-operate is a key part of the plan making process for the NLWP and the North London Boroughs are working closely with other waste planning authorities that are critical for the delivery of an effective waste strategy for North London, in addition to prescribed public bodies such as the Environment Agency and the Mayor.

1 Introduction and Background continued

1.16 As previously highlighted, the North London Boroughs are working closely with the London Legacy Development Corporation (LLDC). The LLDC is a Mayoral Development Corporation with responsibility for securing the regeneration of an area of London focused on the former Olympic Park. The LLDC is the local planning authority, which includes waste planning, for small parts of Hackney and Waltham Forest (and other boroughs not part of the NLWP group). However, while all the Boroughs have an apportionment of waste from the Mayor under the London Plan for which they must plan and find land, the LLDC is not allocated a share of the borough apportionment. The NLWP is required therefore to plan for the quantity of waste generated across the seven boroughs including the parts of Hackney and Waltham Forest that lie within the LLDC area. In carrying out their responsibilities under the NPPW, the North London Boroughs are engaging with other planning authorities outside London which import waste from North London including the LLDC area. The NLWP cannot directly allocate sites/areas within the LLDC area as this is the responsibility of the LLDC as the local planning authority.

1.17 An agreement for the working relationship between the North London Boroughs and the LLDC has been drawn up. This agreement, or Memorandum of Understanding, identifies the Sites and Areas suitable for waste within the Hackney and Waltham Forest parts of the LLDC area. The LLDC's Local Plan also identifies sites and areas that are potentially suitable for waste related uses. For waste development proposals in the parts of Hackney and Waltham Forest which fall within the LLDC area, the LLDC Local Plan policies will apply. Policy IN2 of the LLDC Local Plan requires planning decisions to take full account of the policies within the adopted waste plans of the Boroughs.

Supporting Documents

1.18 The NLWP is accompanied by evidence base documents including a Data Study, Options appraisals, Sites and Areas report and Duty to Co-operate report. There are supporting assessments such as a Sustainability Appraisal (SA) (incorporating the requirements of the SEA Directive), Habitats Regulation Assessment (HRA), a Flood Risk Sequential Test Report) and Equalities Impact Assessment (EqIA). These assessments form a key element in the development of the Plan and help to ensure that the social, environmental and economic impacts of the policies developed in the Plan are assessed and taken into account in the decision making process. There are also reports on the outcomes of all consultations on the NLWP. The supporting documents can be viewed on the NLWP website.

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2 Aims and Objectives

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2 Aims and Objectives

1 Brundtland Commission, 1987 (Resolution 42/187 of the United Nations General Assembly)

Aim of the North London Waste Plan

2.1 Waste management has an important role in achieving sustainable development. There are a number of ways to define 'sustainable development'. The most well-known definition is '*development which meets the needs of the present without compromising the ability of future generations to meet their own needs*'[1]. The UK Sustainable Development Strategy Securing the Future set out five 'guiding principles' of sustainable development:

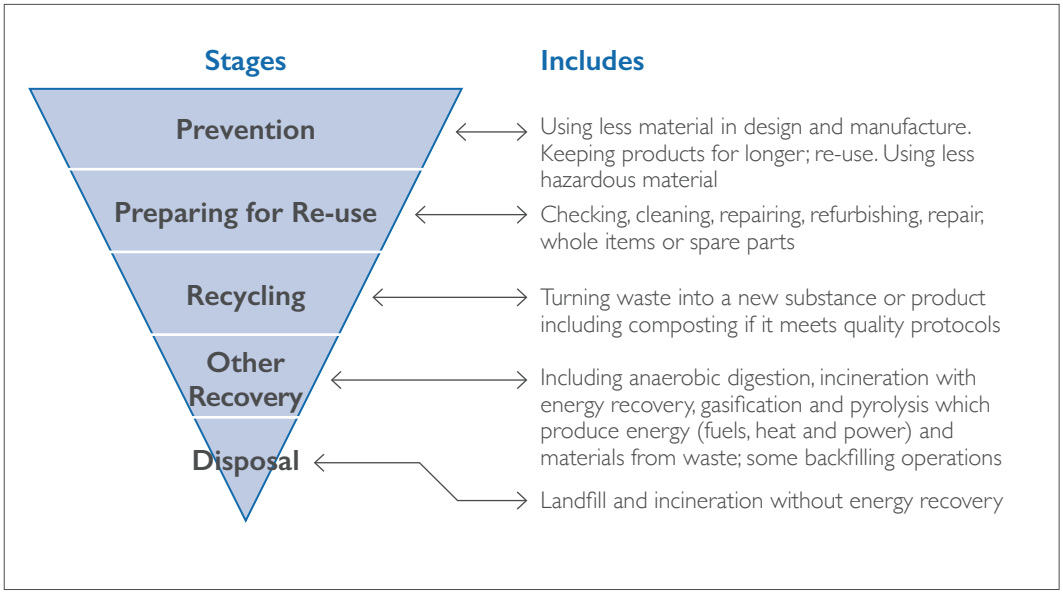
- living within the planet's environmental limits;
- ensuring a strong, healthy and just society;
- achieving a sustainable economy;
- promoting good governance; and
- using sound science responsibly.

2.2 The National Planning Policy Framework (NPPF) references these definitions and goes on to set out three objectives to sustainable development: economic, social and environmental. The North London Waste Plan (NLWP) will help achieve sustainable waste management by providing a sound basis for the provision of waste management infrastructure, contributing to the conservation of resources by improving the efficiency of processing and making better use of the wastes created within North London.

2.3 Each of the seven Borough Local Plans contains a vision for their area, and the aim of the NLWP links to the delivery of that vision. The NLWP therefore includes a single overarching aim and a number of objectives to deliver that aim. The Aim meets the requirements of National Planning Policy for Waste (NPPW) through providing a set of agreed priorities for delivering sustainable waste management in North London

2.4 The NLWP treats waste as a resource rather than as a nuisance, promoting the principles of the waste hierarchy. The Aim acknowledges that the NLWP is part of a wider but integrated approach that will help to deliver sustainable waste management in North London, alongside such measures as improved resource management, and waste prevention and reduction strategies which influence but are outside of the planning framework. The NLWP aim and objectives reference and integrate the Waste Hierarchy which is shown in *Figure 4*.

Figure 4: **Waste Hierarchy**



2 Aims and Objectives continued

2.5 The aim of the NLWP is:

"To achieve net self-sufficiency* for LACW, C&I and C&D waste streams, including hazardous waste, seek beneficial use of excavation waste, and support a greener London by providing a planning framework that contributes to an integrated approach to management of materials further up the waste hierarchy. The NLWP will provide sufficient land for the sustainable development of waste facilities that are of the right type, in the right place and provided at the right time to enable the North London Boroughs to meet their identified waste management needs throughout the plan period".

* Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste generated in North London, while recognising that some imports and exports will continue. Equivalent capacity will be measured by the amount (tonnes) managed for each waste stream against the projected waste arisings in *Table 5*.

Strategic Objectives

2.6 The Strategic Objectives are the steps needed to achieve the Aim of the NLWP. They are delivered through the policies in the Plan and each Strategic Objective signposts the policy or policies through which it will be met. The Strategic Objectives are as follows:

SO1. To support the movement of North London's waste as far up the waste hierarchy as practicable, to ensure environmental and economic benefits are maximised by utilising waste as a resource:
Met through *Policies 2, 4, 6, 7* and *8*

SO2. To ensure there is sufficient suitable land available to meet North London's waste management needs and reduce the movements of waste through safeguarding existing sites and identifying locations for new waste facilities:
Met through *Policies 1, 2, 3, 4, 7* and *8*

SO3. To plan for net self-sufficiency in LACW, C&I, C&D waste streams, including hazardous waste, by providing opportunities to manage as much as practicable of North London's waste within the Plan area taking into account the amounts of waste apportioned to the Boroughs in the London Plan, and the requirements of the North London Waste Authority, to seek beneficial use of excavation waste, and to monitor waste exports as part of the ongoing duty to co-operate:
Met through *Policies 1, 2, 3, 4,* and *8*

SO4. To ensure that all waste developments meet high standards of design and build quality, and that the construction and operation of waste management facilities do not cause unacceptable harm to the health or amenity of local residents or the environment:
Met through *Policy 5*

SO5. To ensure the delivery of sustainable waste development within the Plan area through the integration of social, environmental and economic considerations:
Met through *Policies 2, 5* and *7*

SO6. To provide opportunities for North London to contribute to the development of a low carbon economy and decentralised energy:
Met through *Policy 6*

2 Aims and Objectives continued

SO7. To support the use of sustainable forms of transport and minimise the impacts of waste movements including on climate change:
Met through *Policy 5*

SO8. To protect and, where possible, enhance North London's natural environment, biodiversity, cultural and historic environment:
Met through *Policy 5*

Spatial Principles

Context: Land Use in North London

2.7 Historically much of the employment land in North London has been in industrial use. Inevitably the restructuring from an industrial-based to a service based economy has affected land use priorities, creating a situation where the type of employment land available has changed, particularly in the inner boroughs where offices predominate. Such areas are now under pressure to help deliver high housing and employment targets. The previous use of these areas raises the risk of contamination and the need for remedial measures regardless of how the land will be used in the future.

2.8 Across North London as a whole the predominant land use is housing. While the outer Boroughs are characterised by traditional detached, semi-detached and terraced housing, overall across the Plan area, there is a higher proportion of flats and similar multi-tenant properties. This is particularly the case in the inner Boroughs which, consequently, have fewer gardens (and green waste) than the outer Boroughs. The differing ability of types of housing stock to incorporate waste collection infrastructure (for example recycling bins) impacts on recycling rates in North London (see *Section 4*).

2.9 There are also concentrated areas of commercial activity and town centres. Parts of Camden, Hackney and Islington fall into the Central Activities Zone which covers London's geographic, economic, administrative, and cultural core spanning ten boroughs in total. The Upper Lee Valley on the east of the NLWP area includes a concentrated area of industrial activity. Each borough contains areas of industrial or employment land that are designated for this purpose. The London Plan designates Strategic Industrial Locations (SILs) and provides the strategic direction for the identification of Locally Significant Industrial Sites (LSISs) and other industrial/employment designations in Local Plans.

2.10 North London is one of the most densely populated areas in the UK. There are a number of drivers for change in land use in North London, in particular the need to boost housing numbers and make best and most efficient use of land around public transport modes. These pressures are likely to increase as a result of planned investment such as Crossrail 2, Stratford to Angel Road (STAR) Scheme and four-tracking on the West Anglia Mainline.

2.11 The Boroughs also seek to improve the health of residents and tackle deprivation. Impact on human health has been a key consideration in the development of the NLWP and is discussed in more detail in the Sustainability Appraisal (SA) which supports the NLWP. Maximising economic benefits by utilising waste as a resource is an objective of this plan. There are opportunities for job creation through the development of new waste facilities at both the construction and end user stages. New technologies can also help to create 'green collar'[2] jobs in new waste management facilities as well as in sectors that receive recycled or reprocessed material, turning it into new products, thereby creating wealth from waste.

2.12 To deliver this change, the London Plan has identified Opportunity Areas and Housing Action Zones in parts of North London including parts of the Lee Valley and there may be future Opportunity Areas identified during the NLWP plan period. The Opportunity Areas overlap with land which contains existing facilities and also some of the Priority Areas

2 Aims and Objectives continued

for new waste management facilities identified in this Plan. Therefore, it will be important for the Boroughs to monitor changing land uses through Monitoring Indicator IN4.

2.13 The North London Boroughs are all focused on the challenges posed by climate change. Borough strategies are driven by the requirements to mitigate and adapt to all effects of climate change. The NLWP aims to deliver effective waste and resource management which makes a positive and lasting contribution to sustainable development and to combating climate change. In particular this includes reducing the reliance on disposal to landfill sites outside London, lowering CO_2 emissions from road transport, ensuring new waste facilities generating energy meet the Mayor's Carbon Intensity Floor, directing new development to the most appropriate sites and taking into account the greater occurrence of urban flood events.

Spatial Principles

2.14 The spatial principles flow from the Plan's Strategic Objectives and provide the strategic direction for the detailed policies of the NLWP and inform site/area selection. The principles take account of the spatial and wider policy context, the Plan's evidence base and the views of stakeholders. The spatial principles also guide the assessment of the suitability of windfall sites under *Policy 3*. They reflect the complexities and realities of planning at a sub-regional level taking into account varied characteristics and functions across the seven boroughs, from densely populated urban areas to stretches of Green Belt. Competing and changing land uses, especially release of industrial land for housing, is a key issue for the boroughs.

2.15 The spatial principles set out below represent the outcome of balancing various priorities, opportunities and constraints, in particular the availability of sites/areas to achieve a deliverable distribution of waste management locations to meet identified need, whilst bringing social, economic and environmental benefits of new waste management facilities to North London.

2.16 The NLWP is underpinned by the following spatial principles:

A. Make Use of Existing Sites
B. Seek a Better Geographical Spread of Waste Sites Across North London, Consistent with the Principles of Sustainable Development
C. Encourage Co-location of Facilities and Complementary Activities
D. Provide Opportunities for Decentralised Heat and Energy Networks
E. Protect Local Amenity
F. Support Sustainable Modes of Transport

A. Make Use of Existing Sites

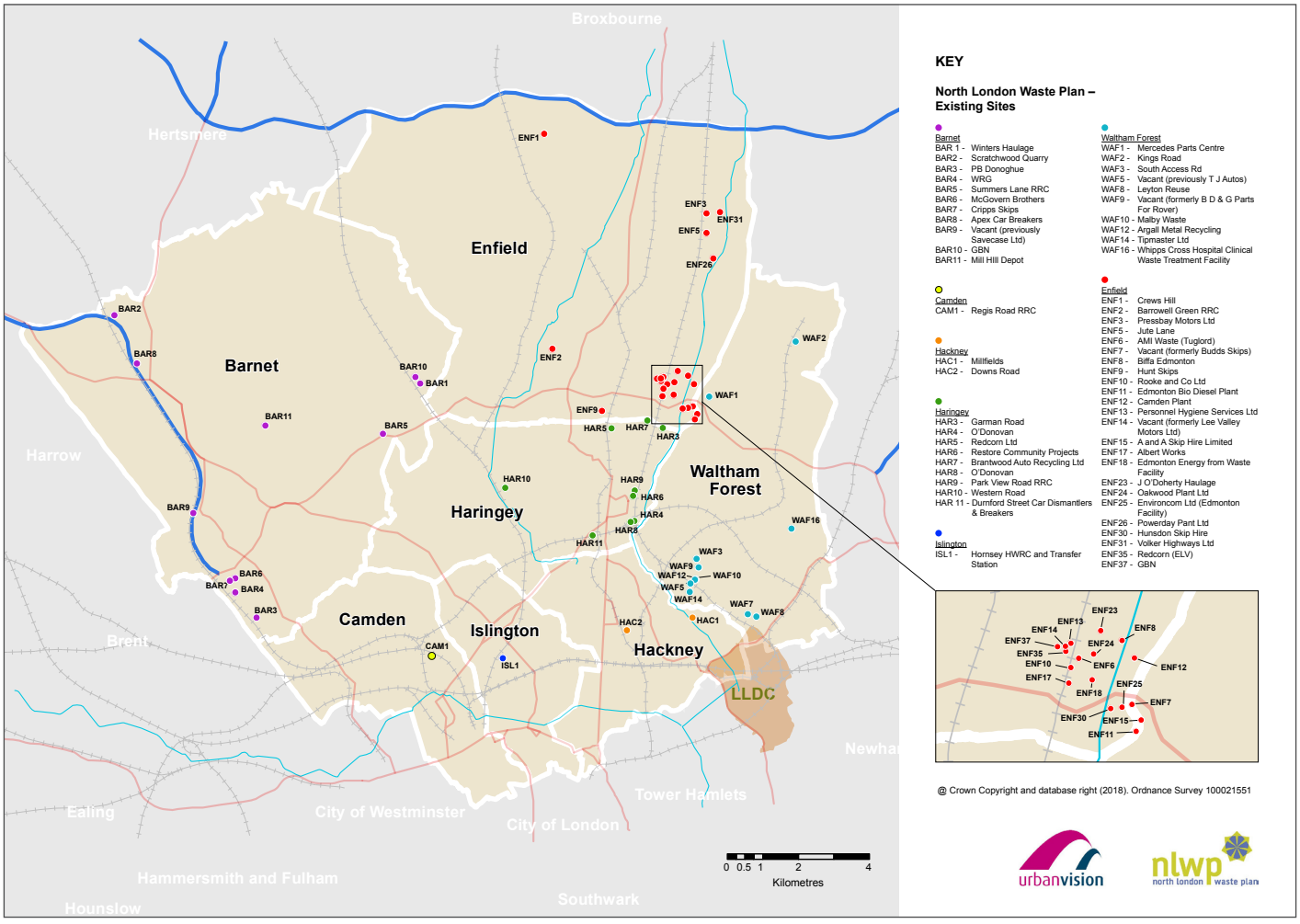
2.17 NPPW requires Boroughs to consider the capacity of existing operational facilities in meeting identified need. Further to this London Plan policy SI8 requires boroughs, when preparing plans, to protect and facilitate the maximum use of existing waste sites.

2.18 In line with this and in order to recognise the valuable contribution existing waste facilities make to managing waste effectively, existing waste management capacity has provided the baseline for identifying the waste management capacity gap and the consequent need for expanded and new facilities. Existing waste management sites form an important part of the strategic waste plan for North London and are safeguarded for waste use through NLWP *Policy 1* and the London Plan (see *Schedule 1* in *Appendix 1* for a full list of existing sites).

2 Aims and Objectives continued

2.19 *Figure 5* shows that the majority of existing waste sites are located to the east of the Plan area in the industrial parts of the Lee Valley corridor. These sites have developed over decades outside of a strategic plan for waste, and in locations which may have been suitable for waste uses but which did not create an even geographical spread across North London. This reflects the mixed function and character of the Plan area, notably in terms of significant differences among the boroughs in supply of industrial land where waste uses are generally more acceptable.

Figure 5: **Existing Waste Sites**



2.20 Three existing sites are known to be planning capacity expansion or upgrades to existing facilities (see *Section 4*). Most other existing sites do not have any current plans to expand capacity or change their operations but the North London Boroughs support, in principle, the expansion or intensification of operations at existing facilities and this is reflected in *Policy 1*. Further guidance for industrial intensification is set out in London Plan Policies E4-E7.

B Seek a Better Geographical Spread of Waste Sites Across North London, Consistent with the Principles of Sustainable Development

2.21 The NLWP is underpinned by an aim to achieve net self-sufficiency for LACW, C&I, C&D waste streams, including hazardous waste. This will be achieved by identifying enough existing capacity and land in North London suitable for

2 Aims and Objectives continued

the development of new waste management facilities to manage the equivalent of 100% of this waste arising in North London. The objective is to reduce movements of waste, including waste exports, and increase the amount of waste managed in proximity to its source, in accordance with the principles of sustainable development. Waste is exported to a number of areas outside of North London, mainly in the south east and east of England. The strategy for achieving net self-sufficiency is set out in the Provision for North London's Waste to 2036 in *Section 6*.

2.22 Net self-sufficiency does not mean that the North London Boroughs will deal solely with their own waste, nor promote use of the very closest facility to the exclusion of all other considerations. While it is desirable for waste to be treated as close as possible to its source in line with the proximity principle, the complexity of the waste management business poses challenges. Different types of waste require different types of management and facilities need to serve areas large enough to be economically viable. Consequently, the most suitable facility may not be the nearest and may well be outside of North London. In addition, facilities in North London will continue to manage waste from outside the area.

2.23 The current and changing character of each borough's industrial land is a consideration in identifying locations for new waste infrastructure. Larger and co-located facilities are more suited to areas with similar existing uses away from sensitive receptors. A future waste industry focused on resource management may derive positive cumulative impacts from a concentration of facilities. Conversely, the urban environments of NLWP boroughs are restricted by severe physical constraints limiting opportunities for some types of waste facilities. In addition, most waste facilities would be regarded as inappropriate development in the protected Green Belt in the north, unless very special circumstances justifying the use of Green Belt land have been demonstrated. As population and densities in the plan area increase with projected growth, fewer areas away from sensitive receptors will be available. Continued development of waste facilities in areas which have, and continue to provide, significant waste capacity could have wider implications on the regeneration of the local economy. When choosing locations for future development, the benefits of co-location will need to be balanced against the cumulative impacts which can arise from an accumulation of facilities in one location. Cumulative impacts can include traffic levels, noise and odours. There may be times when the cumulative impacts of several waste developments operating in an area would be considered unacceptable.

2.24 *Figure 5* shows that there is a concentration of existing waste sites in the Lee Valley corridor, mainly in Enfield. Indeed, Enfield contributes 62% of the land currently in waste use in North London, compared to 18% in Barnet, 12% in Haringey and 5% or less in the remaining Boroughs. The NLWP has the opportunity to address concerns that there is an over-concentration of waste facilities in Enfield by promoting a better geographic spread of sites across North London and create a more sustainable pattern of waste development.

2.25 Any new waste development proposed in North London will be expected to be of a standard that is in keeping with and complements the existing and future planned development. By delivering *Strategic Objective 2* and identifying suitable land across North London (*Policy 2*), the NLWP seeks to provide opportunities to manage waste as close to its source as possible, in line with the proximity principle. In promoting a geographic spread of facilities across the plan area consistent with the principles of sustainable development, the NLWP seeks to weigh the positive effects of co-location and economies of scale with the negative effects of excessive concentration of waste facilities in any one area. All North London Boroughs want to play their part in managing north London's waste and therefore support a more equitable geographical distribution across the seven Boroughs.

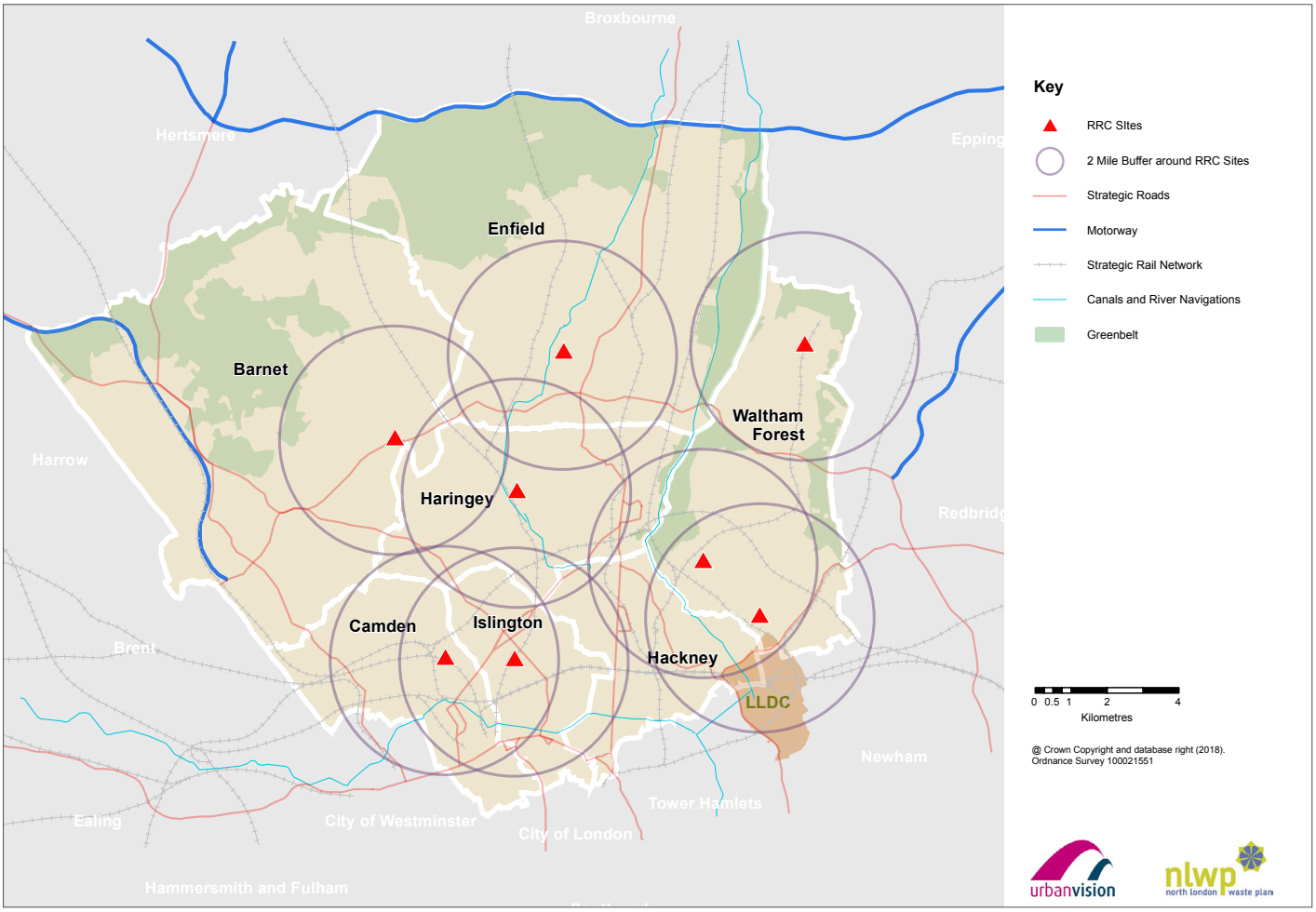
2.26 While all industrial land in North London is suitable 'in principle' for waste uses, there are certain locations which are more suitable than others to provide the waste capacity needed. *Section 5* of the NLWP sets out how 'Priority Areas' for new waste facilities in North London were identified. One of the considerations was creating a better geographical spread, and this has been achieved by limiting the number of Priority Areas within Enfield. The NLWP takes an area-based approach to waste planning and identifies certain industrial and employment areas as in principle more suitable for waste

2 Aims and Objectives continued

use but where the land is not specifically safeguarded for waste. The area-based approach allows for flexibility in bringing forward a range of locations across North London which is combined with policy to promote areas outside Enfield first (see *Policy 2*). This is supported by annual monitoring to check that land for waste capacity is being taken up as anticipated (see *Section 8* monitoring indicator IN3). In addition the NLWP supports the intensification of existing waste facilities where appropriate to optimise their throughput (see *Policy 1*).

2.27 In combination, existing waste sites and the 'Priority Areas' are considered a sustainable network of waste facilities because they present sufficient opportunity to meet North London's waste capacity needs and net self-sufficiency targets while promoting a better geographical spread. They will help reduce movements of waste, including waste exports and increase opportunities for waste to be managed in proximity to its source. New waste facilities will be directed towards the most suitable land in North London when assessed against the planning criteria (see *Table 10*) as well as the character of different areas, changing land uses and availability of suitable industrial land. *Policy 2* identifies these Priority Areas in Schedules 2 and 3. Outside of the Priority Areas, where demand arises, opportunities to improve the spread of waste sites across the area are supported through *Policy 3*: Windfall Sites where they adhere to the site assessment criteria set out in *Section 5*.

Figure 6: **Current Re-use & Recycling Centres (RRC) in North London**



2 Aims and Objectives continued

3 Circular Economy Package http://ec.europa.eu/environment/circular-economy/index_en.htm
4 https://relondon.gov.uk/resources/londons-circular-economy-route-map/

2.28 With local re-use and recycling centres (RRC) it is especially desirable to have a geographical spread that enables good access to residents. RRCs are facilities to which the public can bring household waste for free. *Figure 6* shows the current network of local RRCs and a radius of two miles around them. Gaps in coverage have been identified by the NLWA in parts of the Plan area, namely Barnet and Enfield, shown outside of the two mile radius around each RRC. Any new RRC facilities will be assessed against *Policy 4*: Re-use & Recycling Centres.

C. Encourage Co-location of Facilities and Complementary Activities

2.29 NPPW requires waste plans to identify opportunities to co-locate facilities together and with complementary activities, including end users of waste outputs such as users of fuel, low carbon energy/heat and recyclable wastes. These opportunities are also associated with a move towards a more circular economy. WRAP defines the Circular Economy as *an alternative to a traditional linear economy (make, use, dispose) in which we keep resources in use for as long as possible, extract the maximum value from them whilst in use, then recover and regenerate products and materials at the end of each service life*. The European Commission has published its Circular Economy package[3], while in London the London Waste and Recycling Board has published a Circular Economy route map[4].

2.30 There are several benefits of co-location of facilities. Co-location has the potential to minimise environmental impacts, take advantage of 'economies of scale', share infrastructure, existing networks (eg. the rail and highway network) and skilled workforces. The concentration of waste facilities in the Lee Valley corridor provides the most promising opportunities for co-location with existing facilities. Notwithstanding this, NPPW requires the Plan to take account of the cumulative impact of existing and proposed waste facilities on the well-being of the local community.

2.31 There are also co-location opportunities related to other industrial activities synergistic with waste management, for example the manufacturing of products from recycled materials and the development of a more circular economy. Existing waste facilities are already employing this approach as exemplified by the industries developing around the Edmonton EcoPark (Enfield) and the Plan seeks to build on the momentum by supporting this approach as a key element of the spatial principles and identifying which areas have potential for co-location. Co-location of industrial and non-industrial uses at Strategic Industrial Locations (SIL) is not supported, in line with London Plan policy E5.

2.32 Opportunity Areas, Housing Zones and the route of Crossrail 2 could also be factors when considering co-location of facilities. These schemes are likely to intensify development, especially near to stations, and there are both resulting opportunities and threats for existing waste facilities and land identified as suitable for waste uses. The opportunities include waste facilities supplying energy to new developments and new waste facilities being incorporated into the schemes, for example an anaerobic digestion facility to deal with household food waste, and consolidation or relocation of waste uses. Risks include new uses displacing waste facilities due to incompatibility or impacts of construction. Protection for waste capacity through safeguarding, the agent of change principle and re-provision policies in the London Plan, Local Plans and NLWP *Policy 1* will be a key policy tool under these circumstances.

2.33 Co-location of facilities with complementary activities will be encouraged through *Policy 2*, which directs new waste uses to Priority Areas and provides a spatial focus towards land with similar existing uses away from sensitive receptors. *Policy 3*: Windfall Sites allows for opportunities of locating recycling facilities near to a reprocessing plant that could use the recyclate material. *Policy 5* requires developers to consider the possible benefits of co-locating waste development as well as any potential cumulative impacts.

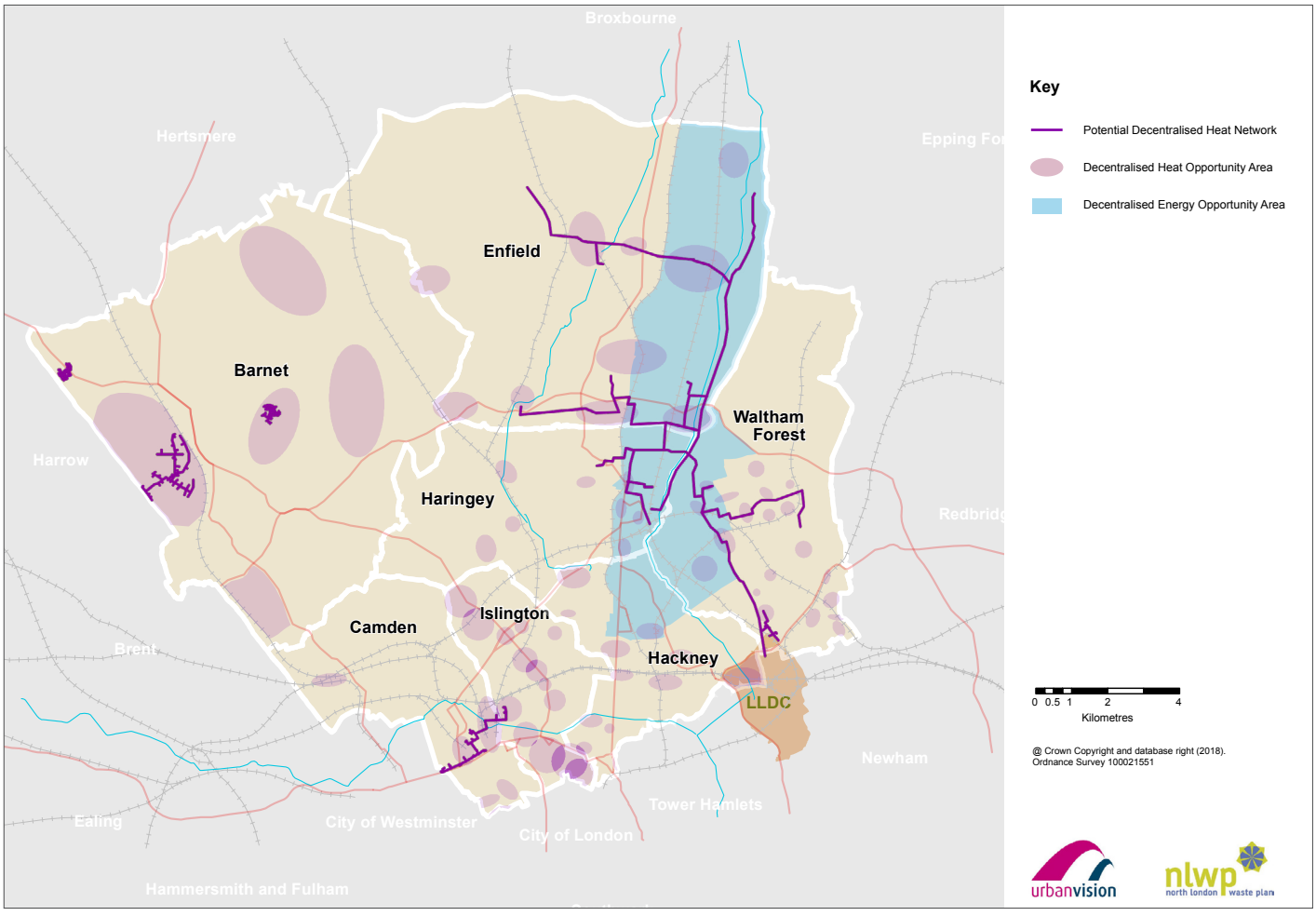
2 Aims and Objectives continued

D. Provide Opportunities for Decentralised Heat and Energy Networks

2.34 The NPPW recognises the benefits of co-location of waste facilities with end users of their energy outputs. The London Plan Policy S18 encourages proposals for materials and waste management sites where they contribute towards renewable energy generation and/or are linked to low emission combined heat and power and/or combined cooling heat and power (CHP is only acceptable where it will enable the delivery or extension of an area-wide heat network consistent with Policy S13 Part D1e). The same policy requires facilities generating energy from waste to meet, or to demonstrate that steps are in place to meet in the near future, a minimum performance of 400g of CO_2 equivalent per kilowatt hour of electricity produced.

2.35 The Heat and Energy Network Diagram (*Figure 7*) shows where facilities could connect to a network ('decentralised heat opportunity area' and 'decentralised energy opportunity area'). There is already a relatively well-advanced plan for decentralised heat network in the Lee Valley and this offers the most promising and realistic possibility within the Plan area. The NLWP supports opportunities to develop combined heat and power networks on sites and areas, within the Lee Valley, south Barnet and elsewhere that not only have the ability to link in to the decentralised energy network but also have the potential for waste development with Combined Heat and Power. *Policy 6* seeks to secure opportunities for the recovery of energy from waste where feasible.

Figure 7: **Heat and Energy Networks in North London**



2 Aims and Objectives continued

E. Protect Local Amenity

2.36 The North London Waste Plan area includes important green space with many parks and larger areas such as Hampstead Heath, the Lee Valley Regional Park and part of Epping Forest. There are extensive areas of Green Belt in the outer areas and areas of agricultural land in Barnet and Enfield.

2.37 Enfield has identified Areas of Special Character where the Council will seek to preserve and enhance the essential character of the area, including landscape features such as woodlands, streams, designed parklands and enclosed farmland.

2.38 The Lee Valley contains an internationally important wetland habitat (Ramsar site and Special Protection Area (SPA)) as the reservoirs and old gravel pits support internationally important numbers of wintering birds as well as other nationally important species. In addition, the adjacent Epping Forest Special Area of Conservation (SAC), part of which lies in Waltham Forest, is important for a range of rare species, including mosses. There are six Sites of Special Scientific Interest (SSSI), 21 Local Nature Reserves and 307 Sites of Importance for Nature Conservation (SINC). The concentration of industrial land in the Lee Valley poses challenges for development to take into account key biodiversity issues set out in Borough Biodiversity Action Plans.

2.39 Throughout North London there are many areas and sites of historic interest including 172 conservation areas, over 14,000 listed buildings, registered landscapes, scheduled monuments, archaeological priority areas and as yet unknown archaeological remains. Protection for heritage assets is included in Local Plan policies and the sites/areas assessment criteria (see *Section 5*) and *Policy 5*.

2.40 The heavily developed and built up nature of North London coupled with differential values between competing land uses, and protected areas such as Green Belt presents a significant challenge in planning for waste. Expected development over the plan period will increase these pressures. For development which is perceived as likely to create more environmental risk and harm to the amenity of the local area, through factors such as noise, dust and increased traffic, the planning constraints near areas protected for their environmental value are greater.

2.41 Protection of groundwater is vital to prevent pollution of supplies of drinking water, while secondary aquifers are important in providing base flows to rivers. The Environment Agency has designated areas of source protection zones in a number of locations, particularly in the Lee Valley as well as implementing groundwater protection measures around boreholes in the area.

2.42 The protection of amenity is a well-established principle in the planning system. The NPPW requires the Boroughs to consider the likely impact on the local environment and on amenity when considering planning applications for waste facilities. Amenity includes aural (noise) and visual amenity such as open space, flora, and the characteristics of the locality including historic and architectural assets. Negative amenity impacts also include odour arising from the processing and type of waste being managed.

2.43 The site selection criteria set out in *Section 5* effectively direct waste management development to the most suitable sites/areas taking into account environmental and physical constraints, including locations where potential amenity impacts can be mitigated to an acceptable degree as well as considering cumulative impacts of additional waste facilities in already well developed areas and areas with a history of waste development. All proposed Areas have been subject to assessment in the Sustainability Appraisal and the Habitats Regulation Assessment and the findings fed into the policy recommendations.

2.44 The protection of local amenity has been considered during the assessment of sites/areas to identify those suitable for inclusion in the NLWP. *Policy 5* sets out assessment criteria for waste management facilities and deals with protection

2 Aims and Objectives continued

of local amenity including information requirements to support applications for waste facilities. The policy's presumption for enclosed as opposed to open air facilities is also important to the application of this principle in terms of air quality and protecting the health of residents.

2.45 As outlined within *Policy 1*, proposals for expansion or intensification of existing waste uses should not unacceptably harm the amenity of occupiers of any existing developments. The onus will be upon the developer of the new proposed development to ensure appropriate mitigation measures are put in place under the agent of change principle.

2.46 *Policy 3* seeks to ensure that proposals for waste management facilities do not constrain areas undergoing development change, such as new transport or economic regeneration initiatives.

F. Support Sustainable Modes of Transport

2.47 North London benefits from good access to the strategic road network such as the M1, M11 and the M25. The local road network is dominated by important radial routes to the centre of London and also includes the key orbital North Circular Road (A406) which bisects the Plan area from east to west. Parts of this network experience high levels of congestion at off-peak as well as peak hours, despite the fact that part of the area lies within the London Mayor's congestion charging zone.

2.48 Air quality within North London is uniformly poor as a result of high levels of nitrogen dioxide and dust (NO_2 and PM10 respectively) that are mainly, but not exclusively, due to road traffic. As a result, all of the councils have declared Air Quality Management Areas (AQMA) covering each Borough.

2.49 Three main train lines terminate at Euston, St Pancras and Kings Cross, all in Camden. The North London Line (NLL) is a commuter and nationally important freight route providing movement of material across the area. There is a planning application to replace the railhead at Hendon in Barnet that currently transports waste out of London by a new facility just to its north. Proposals for the West London Orbital line will improve rail access to the west of the area.

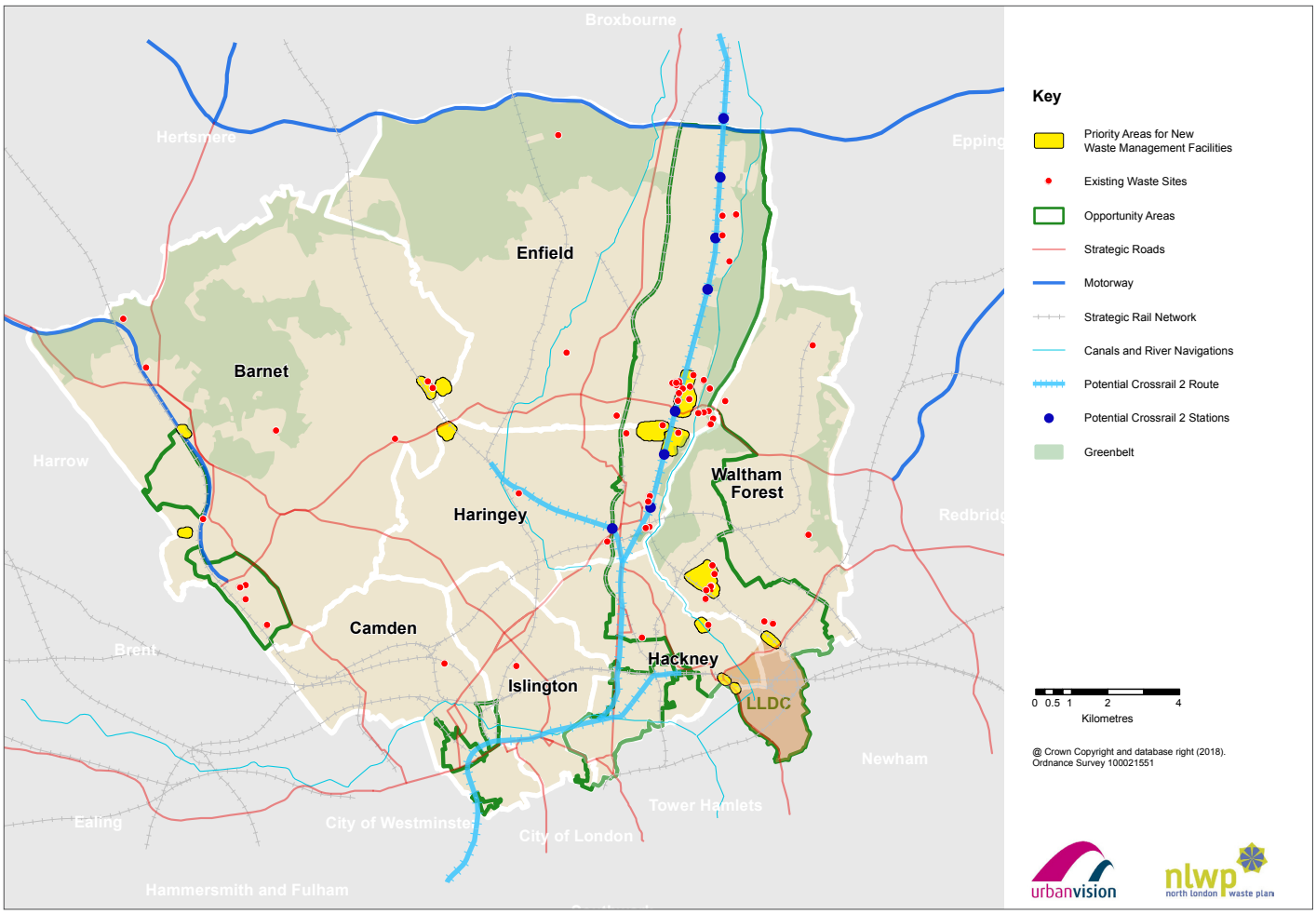
2.50 In March 2016, the National Infrastructure Commission recommended that Crossrail 2, a proposed new rail line serving six of the NLWP constituent Boroughs, should be taken forward as a priority. Transport for London and Network Rail are currently developing the scheme. Whilst the final scheme and timetable is not yet known, there is a potential for Crossrail 2 to impact upon existing or future waste management sites during the NLWP period. This is discussed further in *Section 5*.

2.51 In addition the Grand Union Canal and the Lee Navigation run through the area and provide sufficient draught to allow light cargo movements to and from industrial and other facilities close to a number of wharves along each waterway.

2.52 The NPPW and the London Plan require Boroughs to identify sites/areas with the potential to utilise modes of transport other than road transport. As *Figure 8* shows, North London is well served by road, rail and waterway networks and waste is currently transported into, out of and around North London by both road and rail. But like many industry sectors, road is the main mode of transport for the movement of waste. There are potential opportunities for waste sites to better utilise sustainable modes of transport such as rail and waterways. Movement of waste via more sustainable transport methods is duly supported in line with *Strategic Objective 7*, although this may not always be practicable, especially when costs associated with investment in wharfs and rail sidings and other infrastructure which may be necessary before waste can be moved along the canal or rail network may not be economically viable, especially for smaller facilities. North London currently has one rail linked waste site (at Hendon) supporting the requirements of the NLWA, however this site is due to be redeveloped as part of the Brent Cross Cricklewood regeneration project and the NLWA's need for this railhead has changed. This is reflected in a new replacement waste transfer station (approved by

2 Aims and Objectives continued

Figure 8: **Key Diagram**



Barnet Council in September 2018). A replacement rail based freight facility has also been approved as part of the Brent Cross Cricklewood regeneration scheme under planning permission 17/5761/EIA, which permits the transfer of aggregate and non-putrescible construction waste by rail. This rail transfer facility was brought into operation in March 2020. There is also a wharf on the Lee Navigation which potentially could provide future opportunities for transportation by water at Edmonton EcoPark.

2.53 Road transport will continue to be the principal method of transporting waste in North London, particularly over shorter distances where this is more flexible and cost effective. The efficient use of transport networks combined with good logistics and operational practices can make a significant contribution towards the level of transport sustainability achieved. The transportation of waste as well as other traffic movements to and from sites can impact on amenity along the routes used. *Policy 5* will seek to minimise such impacts where possible, for example through the use of ultra-low and zero emission vehicles. Access to transport networks including sustainable transport modes was considered when assessing the suitability of new sites and areas. Rail and water transport is particularly desirable when waste is travelling long distances. *Policy 5* considers sustainable transport modes in planning decisions.

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3 Current Waste Management in North London

3 Current Waste Management in North London

5 The data is taken from the Waste Data Study (2019)

3.1 This section looks at the current picture of waste management in North London, including the amount of waste generated, how and where it is currently managed; future waste arisings; existing capacity; capacity gaps; and how North London's waste will be managed over the plan period.

North London Waste Data Study

3.2 The Waste Data Study was first prepared in July 2014 and updated in July 2015 to inform the Draft NLWP. A further update in 2019 accompanied the Proposed Submission Plan. All versions of the Data Study are available to view on NLWP website (www.nlwp.net). The Waste Data Study is in three parts as shown below, with the date of the most recent version provided in brackets:

- Part One: North London Waste Arisings (2019)
- Part Two: North London Waste Capacity (2019)
- Part Three: North London Sites Schedule (2019)

3.3 A Data Study Addendum (2020) was prepared to support the Main Modifications to the NLWP. The Data Study Addendum proposes modifications to the way data is presented in the NLWP so that the reader can more readily follow the line of justification and reasoning behind the approach to waste management in North London.

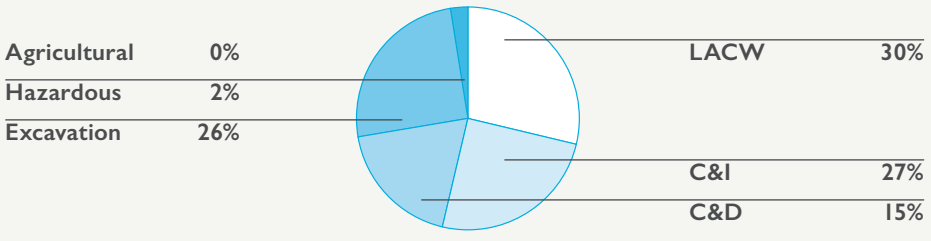
Waste Generated in North London

3.4 *Table 1* below shows the amount of waste generated in North London for the main waste streams using baseline data from 2016. Waste arisings vary from year to year and these figures represent a snapshot in time. *Figure 9* shows the proportion of each waste stream as a percentage of the total waste in North London[5].

Table 1: **Amount of Waste Generated in North London 2016** (Tonnes) Source: North London Waste Data Study Update 2016

Local Authority Collected Waste (LACW)	845,776
Commercial & Industrial Waste (C&I)	762,301
Construction and Demolition Waste (C&D)	443,180
Agricultural Waste	9,223
Hazardous Waste	53,420
Excavation Waste	747,242
Total	2,861,062

Figure 9: **Waste Arisings in North London 2016** (% of total) Source: North London Waste Data Study (2019)



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3 Current Waste Management in North London continued

6 Figures from the NLWA Annual Monitoring Report 2016-17 and ENV18 - Local authority collected waste: annual results tables
7 New Methodology to Estimate Waste Generation by the Commercial and Industrial Sector in England, DEFRA August 2014

How North London's Waste is Currently Managed

3.5 Around 66% of waste generated in North London is managed in North London, excluding excavation waste. The amounts of North London's waste managed within North London and elsewhere is set out in *Table 2*. This section sets out how and where each waste stream is currently managed.

Table 2: **The Amount of North London's Waste Managed in North London and Elsewhere 2016** (Tonnes) Source: Waste Data Interrogator (WDI) and Hazardous Waste Data Interrogator (HWDI)

Waste Stream	Waste Arising	Amount Managed in North London	Amount Managed Elsewhere in London	Amount Exported to Landfill Outside London	Amount Exported to Other Facilities Outside London
LACW	845,776	718,900	1,000	68,900	56,900
C&I	762,301	402,900	34,600	251,600	73,000
C&D	443,180	248,000	108,225	30,200	31,000
Hazardous (HWDI)	53,420	313	12,663	8,557	31,887
Proportion		66%	7.5%	17%	9%
Excavation	747,242	52,523	335,862	265,415	82,463
Proportion		7%	45%	35.5%	11%

Local Authority Collected Waste

3.6 The data for this waste stream is the most reliable. Local Authority Collected Waste (LACW) is reported annually by the North London Waste Authority (NLWA) and data from all waste authorities are published by government along with statistics. In North London, around 845,700 tonnes of LACW was collected in 2016/17[6]. Of this, approximately 224,500(27%) was recycled, reused or composted, below the 30% London average. Of the remaining LACW, 541,300 (64%) was sent to NLWA's energy-from-waste facility at Edmonton (above the London average of 60%) and 68,900 (8%) was sent to landfill outside of North London (below the London average of 12.5%). For household waste only the recycling rate was 32% which is just below the London average of 33%.

3.7 The NLWA has reported an increase in recycling performance for household waste from 23% in 2006/7 to 32% by 2016/17. The percentage of waste going to landfill fell from 36% in 2006/07 to 8% in 2016/17. There are a number of factors which contribute towards lower recycling rates in London than the country as a whole. These include: rapid population growth; a greater transient population than anywhere else in the UK; the greater proportion of flats compared to houses which presents challenges for setting up collection systems for recyclable waste; and proportionately fewer gardens generating lower level of green waste for recycling.

Commercial & Industrial Waste

3.8 The Waste Data Study has used two methods to identify C&I waste arisings. The first is to use data from the Defra C&I Waste Survey 2009 in line with the London Plan to assess the management routes of North London's C&I waste. The second is to use the method based on published data from the Environment Agency's Waste Data Interrogator (WDI), introduced in 2014[7]. The Boroughs have used the 2014 'WDI methodology' for this plan. This method of calculation indicates that around 760,000 tonnes of C&I waste was generated in North London in 2016. Of this, 335,400 tonnes (44%) of C&I waste was recycled, reused or composted while 251,600 tonnes (33%) of this waste stream was sent to landfill and land recovery.

3 Current Waste Management in North London continued

Around 29,600 tonnes (17%) was sent for thermal treatment with energy recovery and a small proportion (6%) of C&I was sent for non-thermal treatment. A high proportion of this waste (around 43%) is currently exported from London.

Construction, Demolition & Excavation Waste

3.9 Local planning policies and development industry practice mean a lot of C&D material is managed on site and does not enter the waste stream. A total of 443,180 tonnes of C&D waste and 747,243 tonnes of excavation waste was produced in North London in 2016. The largest proportion of C&D waste arising in North London is managed via recycling (73%) and treatment (20%) facilities, with 7% sent directly to landfill. Recycling rates of C&D waste are high due to the nature and value of the material and most of this takes place in North London or elsewhere in London. Excavation materials are primarily disposed of outside North London directly to landfill (53%) with the remainder managed through transfer stations (28%) or sent for treatment (19%).

Hazardous Waste

3.10 A total of 53,420 tonnes of hazardous waste was produced in 2016, of this waste 40% was managed at treatment facilities, of which the majority was exported for treatment outside of North London. The next most common method of management was recovery (20%), with a further 16% being managed at landfill. Of the total hazardous waste arisings, 53,107 tonnes (99.4%) of waste was exported out of North London for management. It is not unusual for hazardous waste to travel outside the area to specialist facilities which tend to have a wider catchment area.

Agricultural Waste

3.11 A total of 9,223 tonnes of Agricultural waste was produced in 2016, with only 125 tonnes being identified as being managed off site. The majority of agricultural waste arisings are managed within the limited number of farm holdings within the Plan area, with a very small amount managed offsite through commercial waste facilities. As such, the NLWP does not seek to identify sites for additional facilities to manage this waste stream; any facilities which do come forward on farm land would be considered against *Policy 3* 'Windfall sites'.

Low Level Non-Nuclear Radioactive Waste

3.12 The very small amount of Low Level Non-Nuclear Radioactive Waste (LLW) arising in North London, mainly from hospitals, is currently managed outside of the area in specialist facilities. Records of LLW in the sub-region indicate that there are currently 16 sites producing LLW as waste water, with a number of the amounts generated being below the reporting threshold, which is measured in terms of radioactivity.

Waste Water and Sewage Sludge

3.13 Waste Water Treatment Works in North London are operated by Thames Water. The main Thames Water Waste Water/sewage treatment facility in North London is Deephams Sewage Treatment Works (STW), which is the ninth largest in England. The site is to be retained and improved for waste water use and planning permission has been granted for an upgrade to the effluent treatment stream. Thames Water anticipates that the recently constructed upgrade to Deephams STW will provide sufficient effluent treatment capacity to meet their needs into the next decade. However, this will be reviewed in future AMP periods to ensure ongoing capacity in relation to population growth. Further details can be found in *Section 4*.

3 Current Waste Management in North London continued

Cross Boundary Movements (Exports and Imports)

3.14 North London does not have all the types of facilities necessary to manage all the sub-types of waste arising within the main waste streams shown in *Table 2*. For example, there are few specialist hazardous waste facilities and no landfill sites in North London and so waste which requires these types of facilities will continue to be exported. Exports of waste arising in North London will need to be balanced out by an equivalent amount of additional capacity within North London.

3.15 Some of this capacity will be provided by existing facilities which import waste from outside North London. In 2016, around 1 million tonnes of waste was imported in to North London. Most of the imported waste comes from immediate neighbours in Greater London, the South East and East of England and is managed in transfer stations, treatment facilities and metal recycling sites. The type of facilities in North London with a wider-than-local catchment area include recycling and treatment facilities, in particular metal recycling and end of life vehicle (ELV) facilities as well as facilities for the processing of CDE into recycled aggregate products for resale. Waste will continue to be imported into North London over the plan period in line with market demands.

3.16 In 2016, around 1.4 million tonnes of waste was recorded as exported from North London, 675,788 tonnes of which went to landfill. Most of the waste deposited to landfill was excavation waste (65%) followed by LACW/C&I (35%). Exports of LACW to landfill have been steadily declining in recent years, in line with the waste strategies of the London Mayor and the North London Waste Authority which aim to reduce the amount of waste going to landfill. Data for hazardous waste exports to landfill is shown from both the Waste Data Interrogator (WDI) and the Hazardous Waste data Interrogator (HWDI). The HWDI is the more accurate of the two for hazardous waste, but the total exports to landfill figure is taken from the WDI only. Exports of CD&E waste generally follow patterns of waste arising, so when more CD&E waste is generated, more is exported.

3.17 Local planning authorities have a duty to cooperate with each other on strategic matters that cross administrative boundaries. Exports of waste from one waste planning authority to another is a strategic cross-boundary matter and is an important consideration in assessing the effectiveness of the NLWP. It is therefore important to understand the destination of North London's waste exports and to understand any issues which could prevent similar amounts of waste being exported in the future.

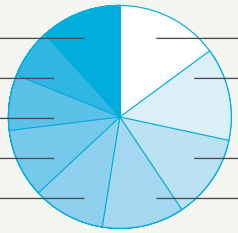
3.18 Although North London is planning for capacity to meet the equivalent of 100% of its waste arisings, North London has no landfill sites and is not planning to open any landfill sites. This means that waste arising in London which cannot be recycled or recovered and can only be disposed of to landfill will continue to do so. *Table 5* identifies the amount of waste which is expected to be disposed of to landfill over the plan period and this will form part of the annual monitoring to ensure that duty to co-operate engagement takes place if there are significant changes from current and anticipated waste exports to landfill.

3.19 It should be noted that exports from and imports into North London are not a measure of North London's net self-sufficiency. Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste need in North London, while recognising that some imports and exports will continue. For most waste streams, the market dictates where the waste is managed, however the more capacity there is within North London, the more opportunity for North London's waste to be managed within its own boundaries.

3 Current Waste Management in North London continued

3.20 During 2013-2016 waste exports from North London were deposited in more than 70 different waste planning authority areas but the majority (88%) went to eight main destinations. These are shown in the *Figure 10* below:

Figure 10: **Destinations of Waste Exports from North London** (% of total) Source: WDI 2013-2016



All other WPAs	12%	East London	15%
Milton Keynes	7%	Hertfordshire	14%
Essex	8%		
Greenwich	10%	Thurrock	12%
Buckinghamshire	11%	West London	12%

3.21 As part of discharging the 'duty to co-operate', the North London Boroughs have contacted all waste planning authorities (WPA) who receive waste from North London to identify any issues which may prevent waste movements continuing during the plan period. A Report on the duty to co-operate, issues identified and next stages accompanies this Plan and is available on the NLWP website.

3.22 In particular, the North London Boroughs have engaged with each of the main recipients of North London's waste to landfill and identified if there are planning reasons why similar exports of waste cannot continue over the plan period, for example the planned closure of a site.

3.23 Engagement to date has identified a constraint to the continuation of waste exports to landfill from North London relating to the scheduled closure of some landfill sites during the plan period, though the operation of some of these sites may be extended beyond their currently permitted end date. This work is set out in the Duty to Co-operate Report.

3.24 It is recognised that non-hazardous landfill capacity in the wider south east is declining and no new non-hazardous landfill sites are being put forward by waste operators. A small number of new inert waste sites are being put forward in former mineral works. The lack of landfill capacity in the wider south east is an issue for all WPAs preparing plans and there is a continuing need to plan to manage waste further up the waste hierarchy to help reduce the need for landfill capacity. The destination of waste is largely dependent on market forces and therefore it is not possible to identify specific alternative destinations where North London's waste will go after the closure of landfill sites during the plan period. The North London Boroughs have established that there is opportunity for the market to find alternative destinations in the wider south east for any of North London's 'homeless' waste in the short term. In the longer term, beneficial use of excavation waste and the Circular Economy Statements will assist the North London Boroughs to reduce exports of waste to landfill and monitor the destinations of waste exports.

3.25 A further constraint for the continued export of waste has been identified with regard to hazardous waste, namely a lack of detailed data on where it ends up. This type of waste is managed in specialist facilities which have wide catchment areas and therefore may not be local to the source of the waste. North London has hazardous waste capacity of around 4,250 tonnes per annum, mainly for end of life vehicles The treatment facilities handle a small proportion of North London's hazardous waste (around 8%) while the rest (92%) is exported.

3 Current Waste Management in North London continued

3.26 While the export of the majority of hazardous waste to the most appropriate specialist facilities is likely to continue, current data collection methods do not identify the hazardous waste facilities in question. No planning issues have been identified which will prevent North London's hazardous waste continuing to be managed at specialist hazardous facilities in any of the areas which receive significant amounts of hazardous waste exports from North London.

3.27 The boroughs will continue to monitor hazardous waste exports from North London and engage with waste planning authorities who receive strategic amounts of North London's waste when and if there are any substantial changes which may affect waste planning in their area.

Aluminium ready for reprocessing

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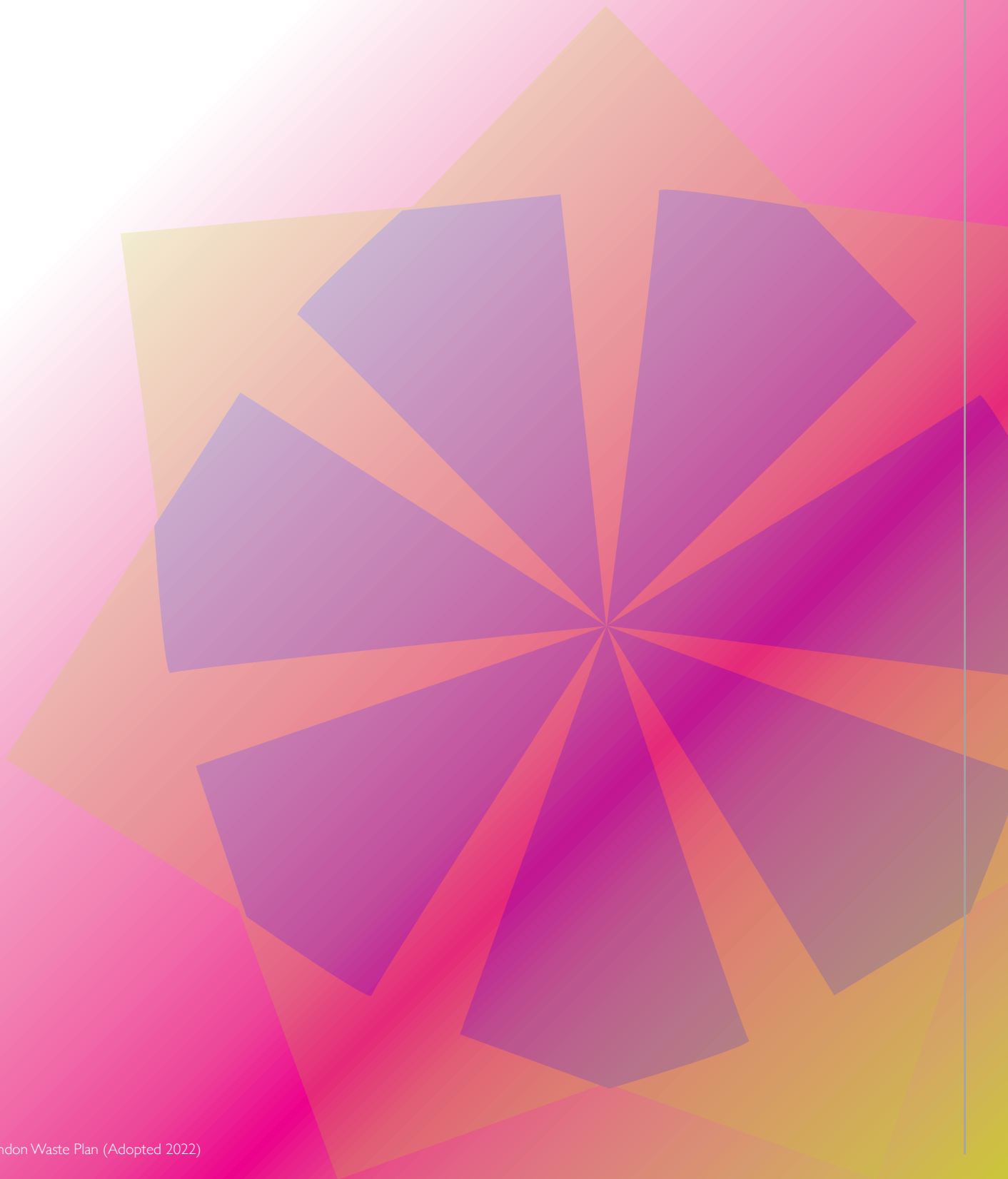

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8 European Commission Circular Economy Package http://ec.europa.eu/environment/circular-economy/index_en.htm

Context

4.1 In line with the NPPW and the London Plan, the NLWP must identify sufficient waste management capacity to meet the identified waste management needs of North London over the plan period.

4.2 It follows that a key part of the development of the NLWP is to identify how much waste will be produced during the plan period, how this will be managed, what capacity is required and whether there is sufficient capacity already available. The NLWP must also consider how changes in the waste management behaviours, practices and technologies may influence this.

Targets for North London's Waste Management

4.3 The North London Boroughs have statutory duties to meet recycling and recovery targets and the NLWP will need to be ambitious in order to achieve European Union, national, regional and local targets. These targets taken from the London Plan (March 2021) are as follows:

Table 3: **Recycling and Recovery Targets with 2016 Baseline**

Waste Stream	Target	2016 Baseline
LACW	Contributing towards 65% recycling of municipal waste by 2030	27%
C&I	Contributing towards 65% recycling of municipal waste by 2030	44%
C&D	95% reuse/recycling/recovery	93%
Excavation	95% beneficial use	Not known
Biodegradable or recyclable waste	Zero biodegradable or recyclable waste to landfill by 2026	Not known
Hazardous	Included in LACW, C&I and C&D targets	N/A

Local Authority Collected Waste

4.4 The North London Boroughs and the NLWA are committed to contributing towards the 65% municipal waste recycling by 2030 target set out in the Mayor's Environment Strategy. The North London Boroughs, together with the NLWA, are beginning a renewed drive to increase recycling including looking at ways to standardise collection regimes. In addition, the London Waste and Recycling Board (LWARB) works with London Boroughs to increase recycling rates and supports waste authorities in improving waste management services.

4.5 The NLWA's long term waste management solution is based upon the continued use of the existing Edmonton facility until 2025 and the development of a new energy recovery facility on the same site to be operational from 2025 onwards. Further information on how it has informed the NLWP is set out in *Section 4*.

4.6 The European Commission has put forward a Circular Economy Package'[8]. This includes a 65% recycling target for municipal waste (LACW and C&I) by 2030. Notwithstanding the UK leaving the EU, the UK has signed up to delivering

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these targets as part of Brexit. The Circular Economy Package (CEP) recycling target of 65% municipal waste by 2030 has been superseded by the London Environment Strategy (LES) published in May 2018 in time to be incorporated into the NLWP. The LES aims to achieve 65% recycling from London's 'municipal' waste by 2030; this will be achieved through a 50% recycling rate from LACW by 2025 (LES *Policy* 7.2.1) and 75% from business waste by 2030 (LES *Policy* 7.2.2). This is a collective target across the whole of London. The LES therefore goes further than the CEP by bringing forward London's LACW recycling target to 2025. The LES states that the Mayor expects waste authorities to collectively achieve a 50% LACW recycling target by 2025 and aspire to achieve 45% household waste recycling by 2025 and 50% by 2030. Responsibility falls largely to London Boroughs in their capacity as waste collection and waste disposal authorities. The NLWA are expected to contribute to the Mayor's targets and produce a waste strategy to show they are acting in conformity with the LES policies and proposals (see LES Box 36).

4.7 Waste minimisation seeks to reduce the amount of waste produced by targeting particular behaviours and practices. As shown in *Figure 4*, preventing waste generation in the first place sits at the top of the waste hierarchy.

4.8 The London Environment Strategy prioritises resource efficiency to significantly reduce waste and promotes reuse and repair. LWARB's 'Circular Economy route map' exemplifies a move towards a more resource efficient waste service. The route map builds on the 5 focus areas (the built environment, food, textiles, electricals and plastics) and sets out 8 cross cutting themes to ensure the benefits of a circular economy can achieved across a number of sectors.

4.9 The North London Boroughs co-ordinate waste prevention activity through the NLWA's waste prevention plan. The NLWA run waste minimisation activities for schools and communities. These are delivered through the NLWA's "Wise up to Waste" programme and currently focuses on three priority areas: reducing food waste, encouraging a reduction of furniture waste by increasing re-use, and reducing textile waste (both clothing and non-clothing).

Commercial & Industrial Waste

4.10 Through the London Environment Strategy, the Mayor is seeking to make London a zero waste city with no biodegradable or recyclable waste sent to landfill by 2026 and by aiming to achieve 65% recycling from London's 'municipal' waste by 2030; this will be achieved through a 50% recycling rate from LACW by 2025 (*Policy 7.2.1*) and 75% from business waste by 2030 (*Policy 7.2.2*). This is a collective target across the whole of London. The Mayor has also said that he does not expect there to be a need for any new energy from waste capacity if existing planned sites are completed (*Policy 7.3.2.b*). The Mayor has also indicated that he will use his powers to ensure there are sufficient sites to manage London's waste. The Environment Strategy embraces the principles of the Circular Economy requiring manufacturers to design products to generate less waste and which can be easily repaired, reused and recycled, and the strategy encourages the development of business to facilitate this.

4.11 There are a number of national schemes which promote waste minimisation. This includes the Courtauld Commitment which aims to reduce food waste, grocery packaging and product waste, both in the home and the grocery sector by 20%, the Mayor's Environment Strategy seeks to go further by setting a target of 50% reduction per head by 2030.

4.12 European Commission Circular Economy Package[9] include increased recycling targets for packaging materials in the commercial and industrial sectors of 65% by 2025 and 75% by 2030. The UK has committed to delivering the Circular Economy targets as part of Brexit.

Construction, Demolition & Excavation Waste

4.13 The London Plan includes a target of 95% reuse/recycling/recovery of C&D waste and 95% beneficial use of excavation waste. Beneficial use could include using excavated material within the development, or in habitat creation, flood defences or landfill restoration. Preference should be given to using the materials on-site or within local projects.

9 http://ec.europa.eu/environment/circular-economy/index_en.htm

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Hazardous Waste

4.14 There are a number of initiatives in place to ensure better implementation of EU waste legislation, including on hazardous waste. None of the circular economy proposals announced by the European Commission in December 2015 will affect the NLWP strategy for hazardous waste.

Options for Modelling North London's Future Waste Arisings

4.15 In accordance with the NPPF (paragraph 35) to ensure the NLWP is justified, a range of options were tested as part of the consideration of reasonable alternatives for modelling North London's waste arisings over the plan period. Analysis of and consultation on these options led to the selection of a preferred strategy. These options seek to reflect the effects of future economic activity, including fiscal, financial and legislative factors such as landfill tax charges driving waste away from landfill, and financial incentives such as ROCs (Renewable Obligations Certificates) increasing the competitiveness of energy recovery. Employment growth is based on demographic projections of employment in the London Plan using North London Borough employment projections and is applied to the growth rates for the C&I and CD&E streams. For the LACW stream, the NLWA have provided the projections which have been used to inform the application for a Development Consent Order to enable them to develop and operate an Energy Recovery Facility (ERF) at the Edmonton EcoPark from 2026. The scenarios considered are summarised in *Table 4*, with the preferred scenarios highlighted.

4.16 Further details of these options is available in NLWP Data Study 2. An Options Appraisal Report (2019) has also been prepared which provides more detail on each of the options considered and provides information on the different scenarios including how much waste would be generated over the plan period (incorporating economic and population growth assumptions), how much waste could be managed within North London (net self-sufficiency options), and how this waste should be managed (management options) for each of the options considered. Meeting North London's LACW, C&I and C&D waste arisings, including hazardous waste, was the preferred net self-sufficiency option because it is compliant with national legislation on managing all main waste streams. In addition, it demonstrates to neighbouring authorities outside London that North London intends to manage as much of its own waste as possible and reduce exports. Growth of 0.81% was chosen as the preferred option because GLA evidence and projections anticipate substantial population and economic growth in London over the next few decades. Maximised Recycling was chosen as the preferred option for the management strategy because it aligns with national, regional and local recycling targets. This option also means that more waste will be managed further up the waste hierarchy with more opportunity to divert waste away from landfill.

4.17 The chosen approach for the NLWP following the option appraisal can be summarised as follows:

Chosen Approach for Planning for North London's Waste
Population/Economic Growth in line with London Plan forecasts
+ Maximising Recycling
+ Net self-sufficiency for LACW, C&I and C&D by 2026 (including hazardous waste)
= Quantity of waste to be managed

4.18 It is considered that this approach provides the most robust modelling scenario to project future capacity gaps, taking account of existing/planned capacity, and waste management needs.

4.19 The results of the modelling of the preferred strategy for waste arisings over the plan period is set out in *Table 5* below. The baseline data for these projections are the waste arisings figures set out in *Table 1* of this plan. These figures represent two sets of projections. The first is how North London's waste is most likely to be managed over the plan

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10 The NLWA Forecasting Model is summarised here

Table 4: **Options Considered for Forecasting North London's Waste Arisings and Need** (Chosen scenerios)

LACW	C&I	C&D	Excavation	Hazardous	Agricultural
Capacity Options					
Meeting the London Plan apportionment	Meeting the London Plan apportionment	Baseline (no change)	Baseline (no change)	Baseline (no change)	Baseline (no change)
Net self-sufficiency	Net self-sufficiency	Net self-sufficiency	Managing as much as possible in North London	Net self-sufficiency	
Self-sufficiency	Self-sufficiency	Self-sufficiency		Self-sufficiency	
Growth Options					
	No growth (0% pa)	No growth (0% pa)	No growth (0% pa)	No growth (0% pa)	No growth (0% pa)
	Minimised growth (0.40% pa)	Minimised growth (0.40% pa)	Minimised growth (0.40% pa)	Minimised growth (0.40% pa)	
NLWA Waste Forecasting Model[10]	Growth (0.81% pa)	Growth (0.81% pa)	Growth (0.81% pa)	Growth (0.81% pa)	
Management Options					
	Baseline (no change)	Baseline (no change)	Baseline (no change)	Baseline (no change)	Baseline (no change)
	Median 80% recycling by 2036 16% Energy Recovery by 2036 4% to Landfill by 2036	Median 85% recycling 9% treatment 6% landfill			
NLWA Forecasting model Central Scenario 44% recycling by 2036 (50% HH recycling by 2036) 55% Energy Recovery by 2036 1% landfill	Maximised 85% Recycling by 2036 12% Energy Recovery by 2036 3% to Landfill by 2036	Maximised 95% recycling/ recovery/reuse 5% landfill	Maximised 95% beneficial use 5% landfill		

4 Future Waste Management Requirements continued

Table 5: **Projected Arisings and Management of North London's Waste 2020-2036** (Tonnes)

Waste Stream	Facility Type	2020	2025	2030	2036
LACW	Recycling	418,169	424,049	430,280	436,824
LACW	Recovery (EfW), Treatment	566,872	572,856	579,725	587,352
LACW	Landfill	2,000	2,000	2,000	2,000
Total LACW arisings (capacity required for net self-sufficiency)		**987,041**	**998,905**	**1,012,005**	**1,026,176**
C&I	Recycling	525,853	566,563	609,743	634,983
C&I	Recovery (EfW), Treatment	152,448	142,523	131,513	136,957
C&I	Landfill	109,139	110,951	112,726	117,392
Total C&I waste arisings (capacity required for net self-sufficiency)		**787,440**	**820,037**	**853,982**	**889,332**
C&D	Recycling	435,054	453,063	471,816	491,347
C&D	Landfill	22,742	23,683	24,664	25,685
Total C&D waste arisings (capacity required for net self-sufficiency)		**457,796**	**476,746**	**496,480**	**517,032**
Hazardous	Recycling	16,838	16,838	16,838	16,838
Hazardous	Recovery, Treatment	23,846	23,846	23,846	23,846
Hazardous	Landfill	12,737	12,737	12,737	12,737
Total Hazardous waste arisings (capacity required for net self-sufficiency)		**53,421**	**53,421**	**53,421**	**53,421**
Excavation	Beneficial use, Recycling, Treatment	733,294	763,647	795,257	828,176
Excavation	Landfill	38,594	40,192	41,856	43,588
Total Excavation waste arisings		**771,888**	**803,839**	**837,113**	**871,764**
Agricultural	Recycling	89	89	89	89
Agricultural	Recovery, Treatment	9,130	9,130	9,130	9,130
Agricultural	Landfill	4	4	4	4
Total Agricultural waste arisings		**9,223**	**9,223**	**9,223**	**9,223**

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[11] Separate figures for municipal and other C&I waste are set out in the Data Study Addendum Appendix A: Waste arisings forecast scenario taken forward in the NLWP

period, aligned with the levels in the waste hierarchy (see *Strategic Objective 1*). While some of North London's waste will still be exported for management or disposal to landfill, the aim of the NLWP is to deliver the equivalent capacity for LACW, C&I, C&D and hazardous waste within its administrative borders. Therefore *Table 5* also shows the total amount of waste arising in North London which the Boroughs need to provide capacity for (net self-sufficiency). This is in line with *Strategic Objective 3* which is to plan for net self-sufficiency by providing opportunities to manage as much as practicable of North London's waste within the Plan area. Prevention and re-use also have a part to play, but in terms of waste management capacity in North London, recovery and recycling will play the most substantial part.

4.20 *Table 5* sets out waste arisings over the plan period and how much of the total will need to be recycled to meet the Mayor's targets shown in *Table 3*. The LACW figures in *Table 5* are taken from the NLWP data study which reflects the NLWA modelling. The NLWA model is based on achieving 50% household waste recycling. Over 80% of total LACW is household waste and the remainder is mostly business waste. The NLWA model assumes business waste recycling improves gradually over time as business waste recycling continues to be encouraged and recycling behaviours change. The combined household and business waste recycling rate in the NLWA model is 44%. In order to meet the Mayor's target of 65% recycling of municipal waste by 2030, around 85% of the 'municipal' portion of the C&I waste stream needs to be recycled. The 'municipal' portion of the C&I waste stream is estimated to be around two thirds of the total[11]. The recycling rates for the municipal portion of the C&I waste stream rise to 85% by 2030 which, together with household and business waste recycling in the LACW waste stream, achieves 65% recycling of municipal waste by 2030 in line with the Mayor's target. The C&D waste stream has a recycling rate of 95% and excavation waste a beneficial use rate of 95% in line with the London Plan targets.

Existing Capacity

4.21 *Table 6* below summarises the existing (2016) capacity of North London's waste management facilities by type of facility and waste stream managed. It identifies an existing waste management capacity of just over a million tonnes per annum of recycling/composting for the LACW and C&I waste streams, just under 600,000 tonnes per annum of energy recovery for LACW, around 630,000 tonnes per annum of recycling and treatment for CD&E waste, and about 4,250 tonnes of hazardous waste capacity. *Figure 5* shows the location of the facilities represented in *Table 6* and a full list is in *Appendix 1*.

Table 6: **Existing Annual Capacity at Licensed Operational Waste Management Facilities**

Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2012-2016

Type of Capacity (Tonnes)		Waste Stream	Existing Capacity (2016)
Management	Recycling/Composting/Treatment	LACW/C&I	1,062,424
		CD&E	633,436
		Hazardous	4,252
	Energy Recovery	LACW/C&I	597,134
	Transfer	All	1,225,068
	Landfill	All	0

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4.22 The London Plan defines the technologies and processes which constitute 'managing' waste and these have been applied to North London's facilities when calculating capacity. Only facilities which recycle and compost waste or recover energy from waste count towards waste 'management' in North London. Transfer Stations are therefore excluded from this total, although many facilities categorised as 'transfer stations' do some recycling and where recycling takes place at transfer stations this has been noted in the site profiles and added to the total in *Table 6*.

Changes to Capacity Over the Plan Period

4.23 Waste management capacity in North London will change over the plan period with some facilities moving or closing down and new facilities being built. This section sets out what we currently know about such changes.

Edmonton EcoPark

4.24 A Development Consent Order (DCO) has been approved by the Secretary of State for a new Energy Recovery Facility (ERF) which will manage the treatment of the residual element of LACW during the NLWP plan period and beyond. The existing Edmonton EfW provides just under 600,000 tonnes of waste management capacity per annum and the new facility will provide around 700,000 tonnes per annum. This is an additional 100,000 tonnes which has been built into the calculation for the capacity gap.

4.25 The NLWA's DCO allows for the loss of the composting plant at the Edmonton EcoPark site in 2020 to make way for the new ERF facility to be built whilst maintaining the current EfW operation and the NLWA are not intending to build a replacement facility. This will result in a capacity loss of around 35,200 tonnes per annum. This has been built into the calculation of the capacity gap. The development also includes a Resource Recovery Facility (RRF) including a new Reuse and Recycling Centre (RRC), a relocated transfer hall and a bulky waste/fuel preparation facility on the site.

Powerday

4.26 Powerday in Enfield is an existing site currently operating as a Waste Transfer Station. Planning permission was granted for an upgrade to a Materials Recovery Facility (MRF) capable of handling 300,000 tonnes of C&I and C&D waste per annum and the new facility was opened in 2015. However, this increase in capacity has not yet happened and it is not clear if the planning permission will be implemented. Therefore this has not been added to the pipeline capacity, however throughput for the site will be monitored and if additional capacity comes online it will be used to close the capacity gap.

Loss and Re-provision of Existing Waste Management Facilities

4.27 Where existing sites need to be relocated or redeveloped, compensatory capacity is required in order to comply with the London Plan, Borough Local Plans and, once adopted, the NLWP. It is known that some waste sites in North London will be redeveloped for other uses as part of the Brent Cross Cricklewood Regeneration scheme. This information has been highlighted in *Schedule 1*.

4.28 The Brent Cross Cricklewood Regeneration Area (BXC) includes four existing waste sites, comprising a NLWA transfer station and three commercial operations. These are BAR3 PB Donoghue, BAR4 Hendon Transfer Station, BAR6 McGovern, and BAR7 Cripps Skips. These sites will be redeveloped under the planning permission for the regeneration of Brent Cross Cricklewood (Barnet planning application reference F/04687/13). The Hendon Rail Transfer Station (BAR4) will be replaced with a new facility to meet the NLWA's requirements; planning permission for a new Waste Transfer Station (WTS) at Geron Way was granted by Barnet Council in September 2018 (Barnet planning application reference 17/6714/EIA). The existing commercial facilities at BAR6 and BAR7 fall within the land required to deliver the early Southern phase of the BXC regeneration which has commenced. The BAR3 site is currently identified for redevelopment in Phase 4 of the BXC regeneration. It is planned that capacity at the waste facilities of BAR4, BAR6 and BAR7 and part of the capacity of BAR3 would be replaced by the new Waste Transfer Station (WTS) delivered as part of the Brent Cross

4 Future Waste Management Requirements continued

Cricklewood Regeneration. The balance of replacement capacity for BAR3 would need to be identified prior to its redevelopment and the London Borough of Barnet will seek to provide replacement capacity within the borough. The Barnet Local Plan will identify potential sites. For the purposes of the plan, therefore, it is assumed there will be no loss of capacity for these facilities.

4.29 Two facilities in Waltham Forest (GBN Services and Pulse Environmental) have closed and their capacity has been replaced in a new facility operated by GBN services in Enfield. While the capacity has moved to a different Borough, there is no loss of capacity for North London as a whole. The new GBN facility is newly built but has been designed with sufficient capacity to replace that lost at the two Waltham Forest facilities and therefore, for the purposes of the plan the capacity of these facilities is assumed to remain the same. The new facility may also be able to provide capacity on top of what has been replaced, and this will be monitored.

Meeting the Capacity Gap

4.30 The capacity gap is the difference between projected waste arisings (*Table 5*) and existing capacity (*Table 3*). *Table 7* below sets out the capacity gap broken down in to five year periods over the NLWP plan period. It takes account of the known changes to capacity over the plan period, including the upgrading and loss of existing facilities). North London can accommodate recycling, composting, treatment and recovery facilities to manage waste and so additional waste management capacity will be in the 'recycling' and 'recovery' tiers of the waste hierarchy in line with *Strategic Objective 1*.

Table 7: **Capacity Gaps Throughout the Plan Period**
(Tonnes)

LACW/C&I	2020	2025	2030	2036
Projections	1,774,481	1,818,942	1,865,987	1,915,508
Existing capacity – recycling/composting	1,076,129	1,076,129	1,076,129	1,076,129
Existing and pipeline capacity – recovery	597,134	700,000	700,000	700,000
Loss of capacity – composting	–	35,200	35,200	35,200
Capacity Gap	-101,218	-78,013	-125,058	-174,579

C&D	2020	2025	2030	2036
Projections	457,796	476,746	496,480	517,032
Existing capacity	633,436	633,436	633,436	633,436
Additional pipeline capacity	0	0	0	0
Surplus capacity	+175,640	+156,690	+136,956	+116,404

Hazardous	2020	2025	2030	2036
Projections	53,421	53,421	53,421	53,421
Existing and pipeline capacity	4,252	4,252	4,252	4,252
Capacity Gap	-49,169	-49,169	-49,169	-49,169

4 Future Waste Management Requirements continued

4.31 To meet the capacity gaps identified in *Table 7*, the North London Boroughs will seek opportunities for new capacity through intensification of existing sites and/or new facilities. The North London Boroughs contacted existing waste operators to find out if there are any current plans to upgrade or intensify their facilities (see *Section 4* and *Policy 1*).

4.32 In order to estimate how much land is required for plan-making purposes, the capacity gap has been converted into a land area requirement based on a typical throughput per hectare for each type of facility. The amount of land required depends on the type of facility and the technology being used. New technologies may come forward during the plan period which have a higher throughput per hectare and so will require less land. The North London Boroughs want to ensure the best use of land in the area and this means maximising the capacity of a site while mitigating any environmental impacts. The land required is indicative only and new capacity will be monitored rather than land. Reference capacities are set out in *Table 8* below. *Table 20* in *Section 7* of the Data Study Part 2 (2019) provides a fuller explanation. *Table 9* below sets out the amount of land required within North London to meet the capacity gaps identified in *Table 6* for the chosen approach of net self-sufficiency for LACW, C&I and C&D waste streams. In order for net self-sufficiency to be achieved by 2026, in line with the London Plan, new capacity will need to be delivered by this date.

Table 8: **Reference Capacities for Land Take for New Waste Facilities** (Tonnes)

Facility Type	Assumed Tonnes per Hectare
Energy from waste (large scale)	165,000
Recycling (C&I & LACW)	128,000
Recycling (C&D)	100,000
Recycling (specialised – eg. metals)	50,000
Recycling (Hazardous)	10,000
Re-use	15,000
Composting	25,000
Treatment plant	50,000
Treatment Plant (Hazardous)	10,000

Table 9: **Indicative Land Take Requirements for Meeting the Capacity Gap**

Waste Stream	Management Type	Hectares 2026
C&I/LACW	Recycling	1.5
Hazardous	Recycling/recovery/treatment	4.9
TOTAL land required in North London		6.4

4.33 There is a requirement for additional recycling capacity to manage the increasing levels of recycled waste expected from the LACW/C&I waste stream reflecting the recycling of 65% from municipal waste (LACW and commercial waste).

4.34 A capacity gap equivalent to around 4.9 hectares of land has been identified for meeting North London's hazardous waste management need over the plan period. While the North London Boroughs support the provision

4 Future Waste Management Requirements continued

of hazardous waste facilities in appropriate locations, it is acknowledged that these facilities generally operate for a wider-than-local catchment area due to their specialist nature. The Boroughs will therefore work with the GLA and other boroughs across London to identify and meet a regional need.

4.35 Additional land is not required to accommodate new facilities for Low Level Non-Nuclear Radioactive Waste (LLW), Agricultural Waste or Waste Water/Sewage Sludge during the plan period.

4.36 The following section sets out the process of identifying suitable locations for new waste capacity to meet the capacity gaps set out in *Table 7*.

Materials Recycling Facility

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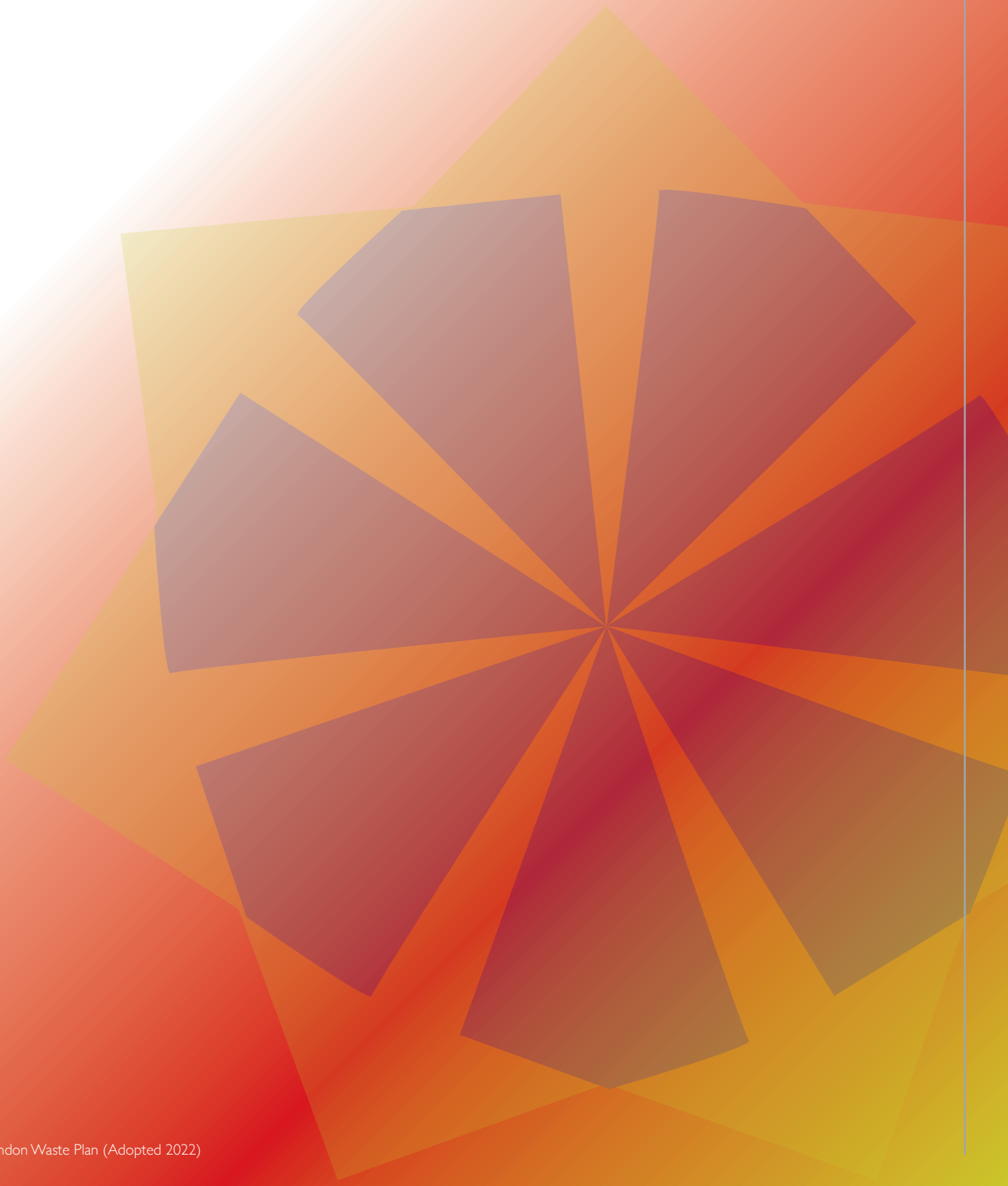
5 Sites and Areas



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5 Sites and Areas

12 Following the introduction of the National Planning Policy for Waste NPPW in October 2014 to replace Planning Policy Statement PPS10, the site and area search criteria were reviewed to ensure compliance with this document

5.1 This section sets out the approach to ensuring that there is sufficient land for future waste management facilities in North London to provide for the delivery of North London's identified capacity requirements. *Sections 3-6* of the National Planning Policy for Waste (NPPW) set out the approach Local Plans should take to identify future waste requirements over the plan period and this has been used to help develop the approach to identifying future locations for waste development in North London.

5.2 At the core of waste planning is the requirement for waste planning authorities to "prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams" (NPPW 3). In particular, waste planning authorities should "identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations" (NPPW 4).

5.3 The London Plan (Policy SI8) requires Development Plans to plan for identified need and "allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste". The London Plan also identifies existing waste sites, Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS) as a focus for new waste capacity.

5.4 *Strategic Objective 2* seeks to ensure there is sufficient suitable land available to meet North London's waste management needs and reduce the movements of waste through safeguarding existing sites and identifying locations for new waste facilities.

5.5 Known opportunities to intensify and upgrade existing facilities have already been taken into account in *Section 4* and have been incorporated into the calculations for meeting the capacity gap. Where further opportunities to optimise waste management capacity on existing sites arise, this is supported by *Policy 1* where the proposal is in line with relevant aims and policies in the North London Waste Plan, the London Plan, Local Plans and related guidance.

5.6 North London's identified waste need and capacity gap is set out in *Section 4* and summarised in *Table 7* above. Additional facilities to meet the capacity gap would require approximately 6.4ha of land, depending on the type of technology used.

5.7 The North London Boroughs assessed a range of sites and areas to meet future waste needs. Assessment criteria have been developed using waste planning policy and in consultation with key stakeholders in a series of focus groups. This work is set out in the Sites and Areas Report. A 'site' in this context is an individual plot of land that is safeguarded for waste use only. An 'Area' comprises a number of individual plots of land, for example, an industrial estate or employment area that is in principle suitable for waste use but where land is not specifically safeguarded for waste. The NPPW and the London Plan endorse the identification of "sites and/or areas" in Local Plans. The approach is also supported by the waste industry and key stakeholders in consultation.

Site and Area Search Criteria

5.8 When seeking suitable locations for new waste facilities, the Boroughs took into account NPPW paragraph 4 which states that waste planning authorities should "consider a broad range of locations including industrial sites" and "give priority to the re-use of previously developed land [and] sites identified for employment uses". The London Plan identifies suitable locations in policy SI8 as existing waste sites and SIL/LSIS. Waste facilities are considered to be industrial uses and are therefore considered suitable, in principle, to be developed on any industrial land in North London. However, in preparing the NLWP, the North London Boroughs have sought to refine this approach and direct new waste facilities towards locations assessed and selected as the most suitable in North London which are identified as "Priority Areas" in the Plan. The criteria used in the NLWP site and area selection process were developed based on the requirements of the National Planning Policy Framework, National Planning Policy for Waste[12], Planning Practice Guidance and the London Plan. Both planning and spatial criteria were discussed with key stakeholders through a focus group session in spring 2014.

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5 Sites and Areas continued

13 Sustainability appraisal is the assessment of the potential impact against an agreed set of social, environmental and economic objectives. It encompasses the requirement of Strategic Environmental Assessment which is a requirement of Europe that all plans undergo
14 HRA is a requirement of Europe that all plans are assessed against their potential impact of natural 2000 sites.

Site and Area Search and Selection Process (Methodology)

5.9 An extensive site and area search and selection process has been undertaken. Full details of the site and area selection exercise are set out in the 'Sites and Areas Report' and the 'Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP' Report available on the NLWP website. In summary it has involved the following key stages:

i. Survey of existing waste sites – this involved a detailed review of the existing waste sites, including obtaining information from the operators on their future plans and validation of existing information held regarding their sites. This work indicated that there was insufficient capacity within existing sites to meet the expected waste arisings over the plan period.

ii. Call for sites – a call for sites exercise was carried out in two stages. This included targeting existing operators, landowners and other interested parties requesting them to put sites forward for consideration.

iii. Land availability search – this was an initial search into the land available in North London that may be suitable for the development of waste management infrastructure. At this stage, all available sites and areas were included in the process in order that the site and area assessment process for the NLWP could then be applied. The result of this work was to identify a long list of potential sites and areas.

iv. Desk based site and area assessment – the long list of sites and areas was then assessed against the selection criteria. As shown in *Table 10* below, the assessment criteria were split into two levels, absolute criteria and screening criteria. The absolute criteria were applied first to determine if the identified constraints affected part of the proposed sites and areas, resulting in their removal. The remaining sites and areas were then subject to the screening criteria. The aim of using the absolute criteria was to ensure that those sites/areas which are wholly unsuitable are excluded from further consideration and to identify those which may be suitable.

v. Site visits were undertaken in August and October 2014 to check and refine information from the desk based assessment and make a visual assessment of the suitability for different types of waste management facilities as well as the relationship with adjoining development. The information was used to complete the criteria-based assessment to ultimately determine the suitability of the sites/areas for future waste development as well as evaluate the potential facility types.

vi. Areas identified as suitable for future waste management facilities were subject to an assessment to calculate the level of capacity they could reasonably be expected to provide. Firstly the proportion of North London's industrial land in waste use was established. This showed the ability of waste facilities to compete with other land uses in these areas was good and that waste is a growing sector in contrast to declining industries such as manufacturing. Secondly, a review of the vacancy rates and business churn for industrial land was used to estimate the proportion of land within these areas which are likely to become available over the plan period. Further information is available in the Sites and Areas Report.

vii. Sustainability Appraisal[13] and Habitats Regulation Assessment[14] of sites/areas – all proposed sites and areas have been subject to these assessments and the findings fed into the policy recommendations.

viii. Consultation with Landowners – Following completion of the above, land owners for all the sites remaining were contacted to seek feedback on the inclusion of their land as a waste site allocation. The findings of this work have further refined the list of sites and further information can be found in the Sites and Areas Report.

ix. Sequential test – any sites and areas lying within a level 2 or 3 flood risk zone have been subject to sequential testing to assess the potential impact of a waste development in this zone. The results of this work can be found in the Sites and Areas Report.

5 Sites and Areas continued

x. Following consultation responses on the Draft Plan, a Sites and Areas Options Appraisal was prepared to analyse a number of different approaches for reducing the total quantum of land identified for new waste facilities and creating a better geographical spread of waste facilities in line with Spatial Principle B. This resulted in the reduction of total land identified for new waste facilities from 351.8ha in the Draft Plan to 102.38ha in the Proposed Submission Plan.

5.10 The assessment criteria applied to all sites and areas is listed in *Table 10* below. The criteria have been used in assessing sites and areas during both the desk based assessment and site visits.

5.11 The sites and areas identified as a result of the methodology set out above were consulted on as part of the Draft Plan prepared under Regulation 18 of the Town and Country Planning Regulations 2012. This was set out in the Sites and Areas Report 2015 which was updated in 2019 for the Proposed Submission NLWP.

Table 10: **Sites and Areas Assessment Criteria**

Absolute Criteria	Screening Criteria
• Metropolitan Open Land (MOL) • Green Belt (for built facilities) • Grade 1 and 2 agricultural land (part of the Green belt) • Sites of international importance for conservation eg. Ramsar sites, Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) • Sites of national importance for conservation eg. Sites of Special Scientific Interest and National Nature Reserves • Ancient Woodlands • Scheduled Ancient Monuments • Listed Buildings (Grade I and II*) • Registered Parks and Gardens (Grade I and II*) • Registered battle fields • Areas of Outstanding Natural Beauty (AONB) • Protected open spaces • Landscape designations such as Areas of Special Character (part of the Green Belt)	• Sites of local importance for nature conservation (SINCs) • Flood risk areas/flood plain • Accessibility (proximity to road, rail, canal/river) • Sites and areas greater than 2km from the primary route network • Ground water protection zones • Surface waters • Major aquifers • Airfield safeguarding areas (Birdstrike zones) • Air Quality Management Areas • Unstable land • Green belt (for non-built facilities) • Local Plan designations • Settings of Scheduled Ancient Monuments • Settings of Listed Buildings • Settings of Registered Parks and Gardens (Grade I and II*) • Neighbouring land uses • Proximity to sensitive receptors

5.12 In order to respond to issues raised during consultation on the suitability of the Draft Plan proposed sites and areas, the North London Boroughs undertook four areas of further work in order to identify which sites and areas should be taken forward:

- Gather and assess additional information on sites/areas
- Changes to policy wording on reducing the impact of new waste development
- Seek a better geographical spread of waste facilities
- Consider options to reduce the amount of land taken forward in the Proposed Submission Plan

5.13 The additional information gathered and assessed included transport evaluations, potential mitigation measures, updating flood risk information and other environmental factors, consideration of where waste facilities might be best located within an Area, heritage and National Grid assets, and identifying Areas within an Opportunity Area, Housing Zone, Crossrail 2 or Lee Valley Regional Park. This information helped inform amendments to *Policy 6*, and Area Profiles were updated accordingly with a further assessment of the suitability of the proposed sites and areas undertaken.

5 Sites and Areas continued

5.14 In response to comments about the distribution of waste facilities across North London, Spatial Principle B was amended from 'Seek a network of waste sites across North London' to 'Seek a better geographical spread of waste sites across North London, consistent with the principles of sustainable development'. This change provided the basis for further work on the distribution of Areas taken forward in the Proposed Submission Plan. 8.25 (part) In considering geographical spread of facilities and reducing the sites and areas to be taken forward in the Proposed Submission Plan, each Borough's current contribution to waste management capacity in North London was calculated. Currently 62% of the total land in existing waste use across North London is located in Enfield. In order to address concerns that there is an over-concentration of waste facilities in Enfield, promote a better geographic spread of waste facilities in North London, and reduce the amount of land taken forward into the Proposed Submission Plan, the Boroughs considered five alternatives with different land options. The details of these options are brought together in 'Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP' (updated 2020).

5.15 The options included and excluded areas based on their performance against qualitative assessment criteria, such as Local Plan designations and performance against suitability rating (banding) as detailed in the Sites and Areas Report. Analysis of each of the five options considered, amongst other issues, the proportion of Enfield's contribution to the Areas identified. One of the options limited the number of Areas for new waste facilities in Enfield to one. The option with the lowest land provided (102ha) combined with the best geographical spread (limiting the land identified in Enfield) has been taken forward into this Plan. In looking to reduce the total amount of land identified as most suitable for new waste uses, the Boroughs did not identify any criterion which would provide a sound basis to reduce the number of areas further than a combined total of 102ha. The other options did not significantly reduce the amount of land identified and/or did not provide a better geographical spread of Areas. The preferred option was to take forward land designated as industrial land and high-performing (Band B) areas, while achieving a better geographical spread by reducing the amount of land for new waste facilities identified in Enfield. This focus on industrial land and the highest performing areas helps to locate waste facilities away from residential properties, as far as this is possible in an urban area like North London.

5.16 Following the work described above, all of the individual sites and several of the Areas were removed from Schedules 2 and 3 and in some of the remaining Areas the amount of land considered most suitable for new waste facilities was refined. The NLWP therefore takes an area-based approach to waste planning with no individual sites allocated for new waste facilities. An area-based approach is one which identifies areas which comprise a number of individual plots of land, for example, an industrial estate or employment area, that is in principle suitable for waste use but where land is not specifically safeguarded for waste uses. The identification of Areas allows for flexibility in bringing forward a range of locations across North London, allowing for a better geographic spread of opportunities for future waste development that is consistent with the spatial principles of the plan to meet North London's requirement. However, because the Areas identified are not safeguarded solely for waste use it is important to identify sufficient land to ensure adequate opportunity across North London for waste operators to provide new facilities because there will competition for this land by other industrial users. It should be noted that most waste planning authorities are in the same position and that this approach is supported by both the NPPW and the London Plan.

5.17 An update to the Data Study to support the Proposed Submission NLWP reduced the indicative land required to meet the capacity gap from 12ha in the Draft NLWP to 9ha in the Proposed Submission NLWP. This has since reduced further to 6.4ha in light of the Data Study Addendum (2020). For the Plan to provide confidence that sufficient land is available in the right place and at the right time a quantum of land and number of Areas has to be identified.

5.18 As identified in the Sites and Areas Report, it is not possible to say precisely how much of North London's industrial land could become available for waste uses over the plan period. This depends on the rate at which existing land becomes vacant in the identified Areas and a waste operator being ready and able to locate on that same site. This in turn depends on the wider economic factors. Identifying a range of land suitable for new waste facilities responds

5 Sites and Areas continued

to the NPPW expectation that waste planning authorities "should identify sufficient opportunities to meet the identified needs of their area". This also provides flexibility for waste operators and should sites not become available in one particular Area, or if an Area changes over the plan period to become unsuitable for waste uses, this approach will ensure there are alternative land options available.

5.19 The work set out in the 'Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP' resulted in reducing the total amount of land identified as most suitable for new waste facilities from 351.8 in the Draft Plan to 102.38ha in the Proposed Submission Plan. While 102ha is a large area when compared to the need for 6.4ha, this land is currently occupied by existing industrial uses. There is strong competition for industrial land in North London and this is reflected by low vacancy rates (an average of 4.8%). The Boroughs will rely on business churn for release of individual sites which could come forward for waste uses. The most recent analysis of business churn in London suggests that around 20% of land could be released in this way. Analysis of business churn and vacancy rates is included in the Sites and Areas Report. To provide 6.4ha, 6% of the Priority Areas would need to be developed for waste management to meet the capacity gap, if no additional capacity is provided on existing sites. It should be noted that 6.4ha of land is indicative only and throughput on a site will depend on the operational technology used. New capacity to meet North London's needs will be monitored rather than land take.

5.20 The preferred approach limits the areas proposed for new waste facilities in Enfield to one industrial area and although this option is considered the most appropriate to take forward in the NLWP, there is a risk that the identified Area in Enfield (comprising 26ha) could accommodate all new waste capacity, which would not respect Spatial Principle B or generally encourage a sustainable distribution. There is also a possibility that applications could come forward for new waste facilities on other industrial land in Enfield. To address this, the 'Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP' recommends a 'Priority Areas' sequential approach to ensure developers consider siting a facility within the Areas listed in Schedules 2 and 3 before other locations. In addition, developers should seek sites in Priority Areas outside Enfield before considering sites in Enfield. This recommendation has been taken forward in *Policy 2*: Priority Areas for New Waste Management Facilities and *Policy 3*: Windfall Sites.

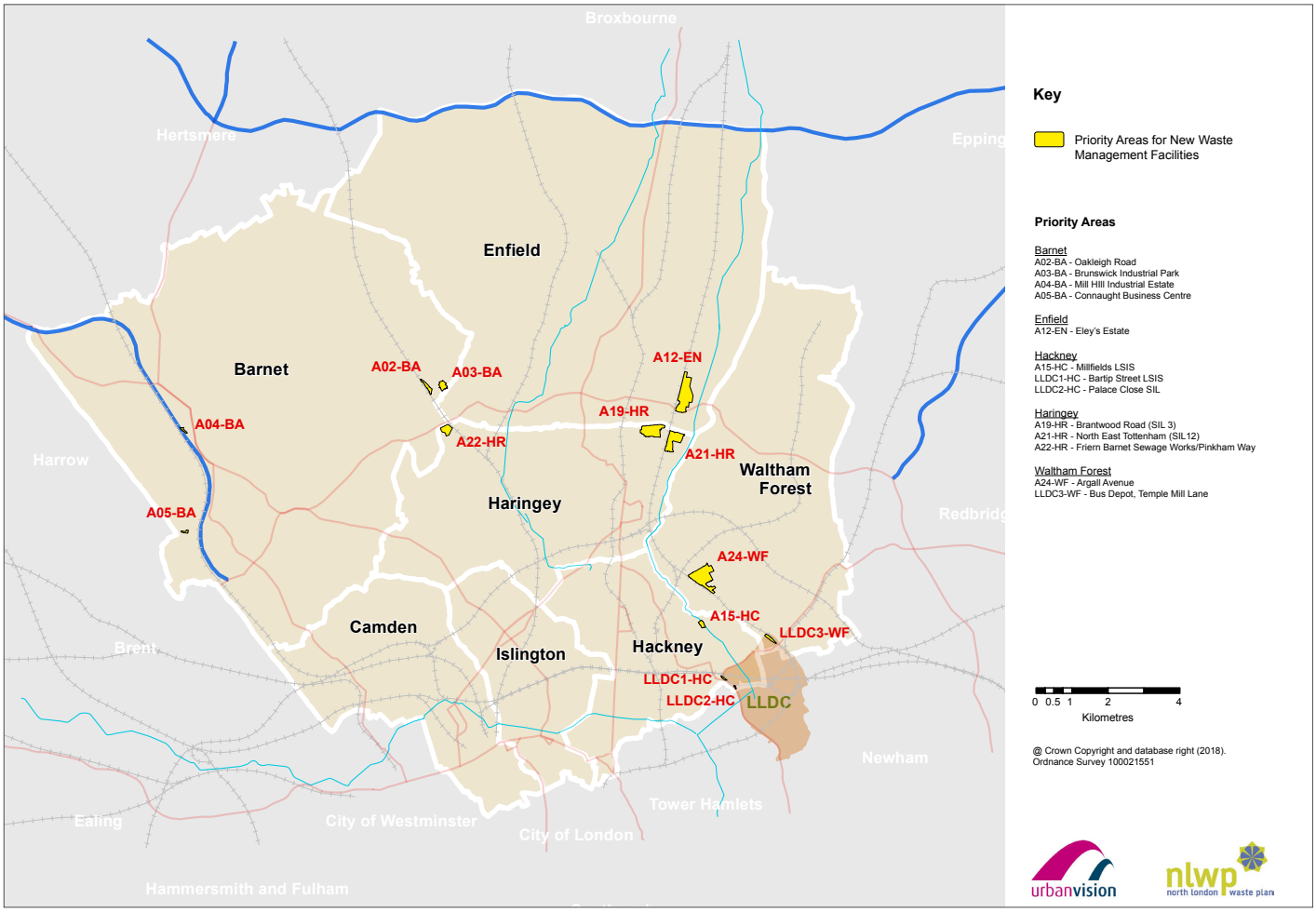
5.21 The Priority Areas, shown in *Figure 11* (see also Schedules 2 and 3 in *Section 7*), have been identified as the most suitable for built waste management facilities. The Priority Areas are being put forward as they comply with the NLWP Spatial Principles which is reflected in the site and area selection criteria, as well as a range of environmental, social and economic criteria set out in the Sustainability Appraisal Scoping Report. In the absence of the identification of individual sites, the Priority Areas represent sufficient opportunities to deliver the identified waste management needs of North London over the plan period. In order to ensure that Priority Areas are the focus for new waste capacity, the location of new waste facilities and any compensatory capacity will be monitored through Monitoring Indicator IN3. The aim of the indicator is to check that sites in Priority Areas are being taken up as anticipated and also monitor if land within Schedules 1, 2 and 3 is not available or suitable for new waste facilities. The later aspect in particular will enable the Boroughs and developers to understand where sufficient land remains available and the geographic distribution of new waste facilities, which will inform potential site searches and evidence required by the Boroughs for those seeking planning consent for sites for waste uses. The monitoring will help to demonstrate the progress of the spatial principle for better geographical spread and achievement of the sequential approach to delivery of new waste sites set out in Policies 2 and 3. Any proposals for waste facilities within the Priority Areas will be subject to planning permission.

The Impact of Crossrail 2 and Opportunity Areas on Existing Sites and Priority Areas

5.22 Transport for London has been consulting on Crossrail 2. The timetable for a Hybrid Bill submission is at present unknown. Depending on the route selected, some existing waste sites and areas identified as Priority Areas for new facilities might be affected by the scheme.

5 Sites and Areas
continued

Figure 11: **Priority Areas for New Waste Management Facilities**



5.23 At the time of publication, only one location (A02-BA-Oakleigh Road) within an area identified in Schedule 2: Priority Areas for new waste management facilities has been identified in the Crossrail 2 safeguarding directions issued in January 2015. This plot of land (shown in *Appendix 2*) has been safeguarded in order to deliver part of the construction of Crossrail 2 and will be released after this is completed. However, as the scheme develops and further information is made available on the preferred route, there could be locations within other Areas, which may be required for the purpose of constructing Crossrail 2, particularly along the West Anglia Mainline. Once known, should applications for waste uses come forward in these locations, they will need to be subject of consultation with TfL and Network Rail as necessary.

5.24 Furthermore, a number of the areas identified in Schedule 2 Priority Areas for new waste management facilities are in locations close to Crossrail 2 stations and could make a valuable contribution towards realising the wider benefits of Crossrail 2 in terms of both delivering additional homes and supporting wider regeneration. Those Areas which in part may have such a role in the longer term include:

- A12-EN – Eley's Estate
- A22-HR – Friern Barnet Sewage Works
- A19-HR – Brantwood Road
- A21-HR – North East Tottenham

5 Sites and Areas continued

5.25 Known information on Crossrail 2 is detailed further in the Area profiles in *Appendix 2* and in the proformas in the Sites and Areas Report.

5.26 In line with the NLWP approach to Opportunity Areas and Housing Zones as set out in *Section 2*, any non-waste related development in these locations will need to be brought forward in a way that safeguards existing capacity (see *Policy 1*) and considers future waste management requirements alongside the need to deliver new homes and more intensive employment uses. Within these locations there is likely to be significant benefit in seeking opportunities to co-locate or consolidate existing waste uses so as to minimise potential conflict and ensure that they can coexist alongside residential and other more sensitive uses.

5.27 As required, the North London Boroughs will work proactively with the GLA and TfL to create proposals which address these issues ensuring that North London's waste management needs can be met whilst helping to realise the significant opportunities associated with schemes such as Crossrail 2.

5.28 How the impact of Crossrail 2 on the NLWP will be monitored and managed is addressed under Indicator IN4 of the monitoring arrangements in *Section 8*.

Waste Transfer Station

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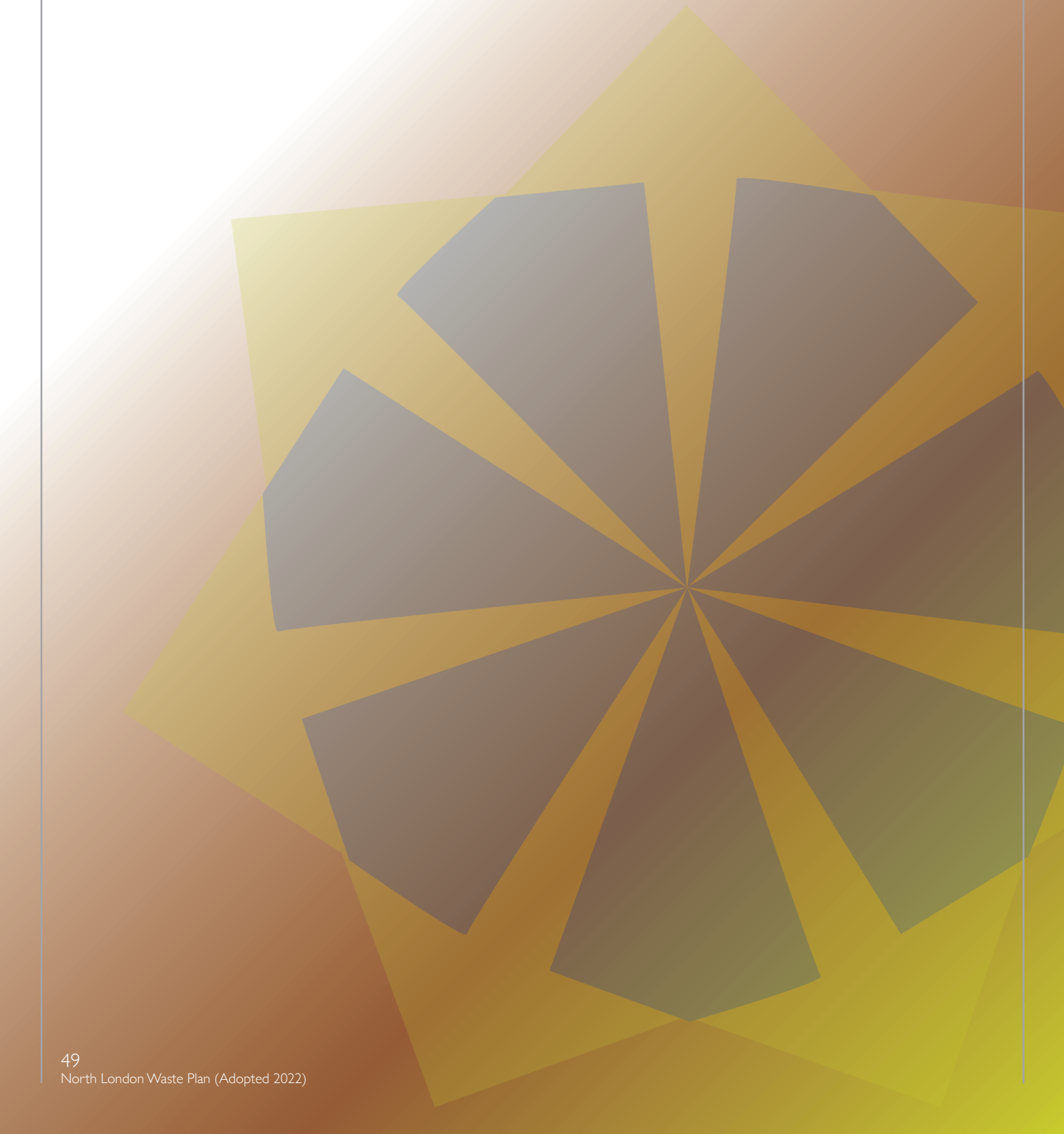
6 Provision for North London's Waste to 2036



6 Provision for North London's Waste to 2036

6.1 *Section 4* sets out North London's waste management capacity gap and *Section 5* sets out the process of identifying sufficient land to meet that capacity gap. This Section brings this information together to set out how North London's waste management needs will be achieved over the plan period.

6.2 The North London Boroughs have developed the following over-arching policy which sets out in broad terms how the waste management needs in North London over the plan period are being planned for.

Over-arching Policy for North London's Waste

The North London Boroughs will identify sufficient capacity and land for the provision of waste facilities to manage the equivalent of 100% of waste arisings (net self-sufficiency) for Local Authority Collected Waste (LACW) and Commercial & Industrial (C&I) waste and Construction & Demolition (C&D) waste by 2026, including hazardous waste. The North London Boroughs will plan to manage as much of North London's excavation waste arisings within North London as practicable, and to ensure that excavation waste exports are put to beneficial use. To achieve this, the North London Boroughs will plan to manage the quantities of waste set out in *Table 5* over the next 15 years. The North London Boroughs will encourage development on existing sites and in Priority Areas that promotes the movement of waste up the waste hierarchy, increases management of waste as close to the source as practicable, and reduces exports of waste to landfill. The North London Boroughs will continue to co-operate with waste planning authorities who receive significant quantities of waste exports from North London.

6.3 Most of North London's waste capacity need is met through its existing facilities. These existing facilities are safeguarded through London Plan policy, however they are not always in the most sustainable locations. The NLWP seeks to make the most of the existing infrastructure by supporting intensification of existing sites, where appropriate, while enabling relocation to more sustainable locations for replacement capacity (see *Policy 1*). Existing capacity and additional new capacity will be needed to meet North London's identified need for waste management over the plan period (2020-2036). The Boroughs are seeking a sustainable network of waste facilities which helps reduce movements of waste, including waste exports and increase opportunities for waste to be managed in proximity to its source. Existing waste capacity in North London is set out in Schedule 1 (see *Policy 1* and *Appendix 1*) and Priority Areas for new waste facilities is set out in Schedules 2 and 3 (see *Policy 3*). The Priority Areas for new waste capacity represent the most suitable land when assessed against the Spatial Principles, including a better geographical spread, and the assessment criteria detailed in the *Section 5*. This helps to deliver *Strategic Objective 2* which seeks to ensure there is sufficient suitable land available to meet North London's waste management needs. The focus for new waste capacity in North London is for recycling and recovery facilities to manage the quantities of waste set out in *Table 5*, thereby reducing exports. New waste facilities will be assessed against the criteria in *Policy 5*.

6.4 *Table 8* sets out the quantities of waste, by waste stream, which need to be managed within North London in order to meet *Strategic Objective 3* and the policy for net self-sufficiency target for LACW, C&I and C&D waste by 2026, including hazardous waste. *Table 5* also takes account of the policy to divert excavation waste away from landfill and towards beneficial use. The quantities of waste take into account population and economic growth and waste targets including net self-sufficiency, apportionment, recycling and landfill diversion, set out in the London Plan. The North London Boroughs are planning to meet more than their apportionment targets and to manage the waste arisings for North London. Further details of the methodology to estimate waste arisings is available in the NLWP Data Study (2019).

6.5 The North London Boroughs will monitor the NLWP against the projected quantities of waste generated set out in *Table 5*, (IN1), new waste management capacity delivered (IN2),), the locations of new waste facilities and compensatory capacity (IN3) and the amount of waste exported (IN7) to ensure the over-arching policy is being delivered. All monitoring indicators are set out in *Section 8* of this plan.

6 Provision for North London's Waste to 2036 continued

6.6 The following section sets out how North London's will meet its strategy for waste to 2036 in more detail, setting out each waste stream and management method separately.

Local Authority Collected Waste (LACW) and Commercial & Industrial Waste (C&I)

6.7 Local Authority Collected Waste (LACW) and Commercial & Industrial (C&I) waste streams comprise similar types of waste. Most facilities which manage these waste streams do not differentiate between them and so it is reasonable to group them together when assessing existing capacity and planning for additional capacity.

6.8 There is a capacity gap of up to around 174,500 tonnes for LACW and C&I waste over the plan period. This equates to approximately 1.5 hectares of land, depending on the technology of the facility/ies. This calculation includes the increase in EfW capacity and the loss of composting capacity at Edmonton EcoPark.

Recycling/Composting

6.9 The North London Waste Authority (NLWA) and seven constituent boroughs are required to prepare a Joint Waste Strategy (JWS) for North London. The most recent JWS came to an end in December 2020. A key element of that strategy has been met through the granting of permission for a replacement energy recovery facility at the Edmonton EcoPark to treat residual waste. A replacement JWS will be developed by NLWA in conjunction with the seven constituent boroughs, but requires a clear position on the circular economy and recycling from central government; it is hoped that this will be within the next year. The new Joint Waste Strategy will focus on activities to move all waste up the waste hierarchy. In the short term, a Residual Waste Reduction Plan has been agreed after consultation with constituent boroughs. This Plan forms a short-term strategic approach from NLWA, which will inform the development of the next Joint Waste Strategy. The NLWA expect a new JWS will be being developed in 2021 and 2022. A new JWS will set out how North London will contribute to the Mayor's recycling targets as set out in the London Plan and London Environment Strategy.

6.10 There is a need for additional capacity for recycling for the LACW/C&I waste stream throughout the plan period. LACW and C&I are combined for the purposes of waste planning as many facilities manage both waste streams.

6.11 In addition to recycling, the existing composting facility at Edmonton will be displaced due to the development of the new Energy Recovery Facility. The NLWA are not intending to build a replacement facility to meet this requirement. Current contracts exist to export this waste outside the Plan area.

6.12 There is an opportunity to bring forward new LACW waste recycling/composting capacity on the Friern Barnet Pinkham Way site which is owned by the North London Waste Authority, although presently there are no plans to do so. There are also opportunities to bring forward commercial recycling capacity in all but one of the Priority Areas identified in Schedules 2 and 3, and composting capacity on four of the Priority Areas. Additional capacity and recycling rates will be monitored by Monitoring Indicator IN1 and reported in the Annual Monitoring Report.

Recovery

6.13 Most LACW is managed at the Edmonton EcoPark facility which has an existing capacity of around 600,000tpa. In November 2014 the NLWA announced plans for the development of a new Energy Recovery Facility (ERF) – the North London Heat and Power Project – on their existing site at the Edmonton EcoPark in Enfield. This will replace the existing Energy from Waste (EfW) plant at the EcoPark that is coming to the end of its operational life.

6.14 The new Energy Recovery Facility (ERF) will have a capacity of around 700,000 tonnes per annum to deal with all the residual waste under the control of the Authority from 2025 until at least 2050. The replacement facility will generate power for around 127,000 homes and provide heat for local homes and businesses as part of a decentralised energy network known as the Lee Valley Heat Network, trading as energetik.'

6 Provision for North London's Waste to 2036 continued

6.15 Once the new facility has been developed, the existing EfW facility will be demolished. The associated parcel of land, on which the current plant is located, will continue to be safeguarded for future waste use as part of ENF18 in *Schedule 1*, and will become available towards the end of the plan period. The development of the Edmonton EcoPark for the new ERF will provide a strategic facility for the NLWP and provide a solution for managing the non-recyclable element of LACW. Delivery of this facility will see the NLWA continue to manage LACW from the North London Boroughs and help reduce the reliance on disposal of waste to landfill. Enfield Council have adopted Edmonton EcoPark Supplementary Planning Document and are preparing the Central Leeside Area Action Plan, both of which provide more detail on the planning framework and objectives for this site.

6.16 As the existing EfW facility at Edmonton does not currently treat C&I waste, it is likely this waste will continue to be exported in the short to medium term until 2025. After this time, the recovery requirement of C&I waste can be met by the new Edmonton ERF to the end of the plan period.

6.17 There are opportunities for additional recovery capacity to be brought forward on three of the proposed Priority Areas.

Transfer

6.18 NLWA manage three waste transfer stations in North London namely the Hendon Rail Transfer Station (Barnet), Edmonton EcoPark Transfer Station (Enfield) and the Hornsey Street Transfer Station (Islington). The Hendon Rail Transfer Facility in Barnet is being relocated due to the Brent Cross Cricklewood development and a planning application is currently under consideration for the new location within Barnet.

6.19 Many waste transfer facilities also recycle some of the waste they receive. There is opportunity for waste transfer facilities to come forward on nine of the Priority Areas.

Landfill

6.20 North London has no landfill sites and depends on capacity outside the Plan area. The NLWA intend to minimise the amount of LACW sent direct to landfill by maximising recycling and ensuring the existing EfW facility can sufficiently manage the expected tonnage of North London's residual waste up to 2025. Much less waste will be exported to landfill from 2017/18 due to changes in contractual arrangements and virtually no LACW will go to landfill by 2026.

6.21 It is anticipated that some C&I waste will continue to be exported to landfill throughout the plan period, although this will be a decreasing quantity as new facilities become operational and recycling levels increase.

Construction, Demolition & Excavation Waste (CD&E)

Recycling

6.22 North London has sufficient capacity to manage Construction and Demolition (C&D) waste arising in North London over the plan period. Some exports of excavation waste will continue, but opportunities to manage as much of this waste stream as practicable within North London will be sought.

6.23 The majority of C&D waste is recycled on-site or through transfer facilities. Each Borough Local Plan has a sustainable design and construction policy in place which seeks to minimise waste generated during the design and construction of development and re-use or recycling of materials on-site where possible. Recycling rates will be monitored by Monitoring Indicator IN1 and reported in the Annual Monitoring Report.

6 Provision for North London's Waste to 2036 continued

Landfill

6.24 North London has no landfill sites and depends on capacity outside the NLWP area. A reduced amount of the CD&E waste stream will continue to be exported to landfill, but the majority (95%) of C&D waste will be reused, recycled and recovered and the majority of excavation waste (95%) will be put to beneficial use.

Hazardous Waste

6.25 All the waste streams include some hazardous waste. Some facilities in North London, whilst not classified as hazardous waste management facilities, are permitted to manage a certain amount of hazardous waste alongside non-hazardous wastes. Hazardous waste is more commonly managed in specialist facilities which have and depend on wide catchment areas for their economic feasibility, and may not be local to the source of the waste. Planning for hazardous waste is a strategic issue (regionally and arguably nationally rather than sub-regional) and it is not anticipated that land for facilities would be identified to meet the requirements of North London alone, though the Priority Areas identified in the NLWP have been assessed for their potential suitability for such facilities.

Recycling and Recovery

6.26 North London has a number of facilities which manage hazardous waste alongside other non-hazardous waste. The majority of these are vehicle depollution (car breakers) and metal recycling sites. There are also transfer facilities such as RRCs which will accept hazardous waste, for example, paints and batteries which require specialist treatment and disposal. Such sites will continue to make a valuable contribution to managing North London's hazardous waste requirements. The amount of hazardous waste managed in North London varies from year to year with a maximum capacity of around 4,250 tonnes over the last five years.

6.27 There is a capacity gap for the management of around 49,000 tonnes per annum, requiring an estimated 4.9ha of land. The North London Boroughs support the provision of such facilities in principle in the Priority Areas and will work with the GLA and other Boroughs across London to meet this need. It is noted in the Area profiles in *Appendix 2* of the NLWP where a Priority Area is not suitable for hazardous waste recycling and recovery facilities. Any applications for hazardous waste facilities in North London that do come forward will be considered on a case by case basis. However, in the short term it is likely that hazardous waste will continue to be exported to the most appropriate specialist facilities.

Landfill

6.28 The need for export to landfill of around 13,000 tonnes per annum, is expected to continue due to inability of the area for provide this type of facility. This reflects the amount of hazardous waste which cannot be recycled or treated, for example asbestos. The North London Boroughs will continue to work with waste planning authorities who receive hazardous waste from North London to identify constraints to the continued export of this waste and identify potential new destinations if necessary.

Agricultural Waste

6.29 The small amount of agricultural waste generated in North London is not expected to increase over the plan period and there is no requirement to plan for additional facilities to manage this waste stream.

Low Level Radioactive Waste

6.30 The very small amount of Low Level Non-Nuclear Radioactive Waste (LLW) arising in North London is produced as wastewater and disposed of through foul sewer and it is expected that this will continue. Any more specialist waste which may be produced would need to be managed outside the area in specialist facilities. It is therefore not necessary to plan for additional facilities in North London for this waste stream.

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6 Provision for North London's Waste to 2036 continued

Waste Water

6.31 The main sewage treatment facility in North London is Deephams Sewage Treatment Works (STW), operated by Thames Water. Work to upgrade this facility was largely completed in 2017. Thames Water anticipates this will provide sufficient effluent treatment capacity to meet its needs into the next decade during the plan period. However, this will be reviewed in future AMP periods to ensure ongoing capacity in relation to changing population growth predictions.. It is therefore not necessary to identify additional land for this waste stream in the NLWP, however any new facility for waste water will be assessed against *Policy 7*.

Preparing for re-use

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7 Policies

7 Policies

7.1 The policies set out in this section will form part of each Borough's 'development plan' which also includes the Mayor's London Plan and individual borough Local Plans (see *Figure 2*). All planning applications for waste uses will be assessed against the following NLWP policies and other relevant policies in the development plan and any associated Supplementary Planning Documents (SPD)/guidance. Any proposals for waste development will be expected to take account of the full suite of relevant policies and guidance.

7.2 The NLWP policies will help deliver the NLWP's aim and objectives, Spatial Principles and the Overarching Policy for North London's Waste. The supporting text sets out why the particular policy approach has been chosen and how the policy will be implemented.

7.3 The policies are:

Policy 1:	**Existing Waste Management Sites**
Policy 2:	**Locations for New Waste Management Facilities**
Policy 3:	**Windfall Sites**
Policy 4:	**Re-use & Recycling Centres**
Policy 5:	**Assessment Criteria for Waste Management Facilities and Related Development**
Policy 6:	**Energy Recovery and Decentralised Energy**
Policy 7:	**Waste Water Treatment Works and Sewage Plant**
Policy 8:	**Control of Inert Waste**

Policy 1: **Existing Waste Management Sites**

All existing waste management sites identified in *Schedule 1: Existing safeguarded waste sites in North London*, and any other sites that are given planning permission for waste use, are safeguarded for waste use.

Expansion or intensification of operations at existing waste sites will be permitted where the proposal is in line with relevant aims and policies in the North London Waste Plan, the London Plan, Local Plans and related guidance.

Applications for non-waste uses on safeguarded waste sites will only be permitted where it is clearly demonstrated by the developer to the satisfaction of the relevant borough that compensatory capacity will be delivered in line with the spatial principles on a suitable replacement site in North London, that must at least meet, and, if possible, exceed, the maximum achievable throughput of the site proposed to be lost and help to promote the increased geographical spread of waste sites across the plan area.

Development proposals which would prevent or prejudice the use of existing waste sites for waste purposes will be resisted under the agent of change principle unless design standards or other suitable mitigation measures are adopted to ensure that the amenity of any new residents would not be significantly adversely impacted by the continuation of waste use at that location or suitable compensatory provision has been made for the waste use elsewhere within the Plan area.

This policy helps meet strategic objectives SO2 and SO3
This policy contributes towards Spatial Principles A and C

7.4 The purpose of *Policy 1* is to ensure that the existing waste capacity in North London is protected and is able to expand where appropriate. It applies to sites with existing operational waste facilities, and any other sites developed for waste use throughout the plan period. The safeguarding of waste sites for waste use does not preclude waste operators from moving and selling their site as a waste site.

7 Policies continued

7.5 *Schedule 1: Existing safeguarded waste sites in North London* is in *Appendix 1*. The London Plan requires boroughs to protect their existing waste capacity and each North London Borough is safeguarding this land through their Local Plan and Policies Map. The contribution currently made by these facilities, and their future contribution, is taken into account in the estimation of how much additional waste management capacity is needed throughout the plan period, so it is important to protect these existing facilities to ensure there is sufficient capacity available to meet identified needs over the plan period. If existing facilities were lost and the capacity not replaced elsewhere in North London, this would result in additional waste capacity being required to meet the identified need and achieve net self-sufficiency.

7.6 Some existing waste sites may have the potential to increase their capacity, or provide additional waste services; planning applications for such changes will be permitted where they are in alignment with policies in this Plan and with Borough Local Plans.

7.7 If, for any reason, an existing waste site is to be lost to non-waste use, compensatory waste capacity will be required. Compensatory capacity must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost. When assessing the throughput of a site, the maximum throughput achieved over the last five years should be used. This information is sourced from the Environment Agency's Waste Data Interrogator. It is the responsibility of the developer to demonstrate that replacement capacity has been provided. Where this information is not available, for example if a waste site has been vacant for a number of years, the potential capacity of the site should be calculated using an appropriate and evidenced throughput per hectare. Applicants will need to demonstrate that provision of replacement capacity is secured before permission is granted for an alternative use. This could be through a compensatory site of a suitable size to meet at least the maximum annual throughput or an increase of capacity in an existing facility. Boroughs may consider using conditions or s106 agreements to satisfy themselves that compensatory capacity will be delivered. It may not be necessary for replacement sites to be on a 'like for like' basis, for example, a new site with a larger capacity might replace a number of sites with individually smaller, but combined equivalent, capacity.

7.8 Compensatory provision should be delivered in accordance with the spatial principles and such proposals will need to demonstrate compliance with *Policy 2* (Priority Areas for new waste management facilities), *Policy 3* (Windfall sites) and *Policy 5* (Assessment Criteria for waste management facilities and related development) of the NLWP. Compensatory capacity should be provided within North London unless the NLWP Monitoring Report demonstrates that waste capacity in North London is sufficient to meet net self-sufficiency for LACW, C&I and C&D waste, including hazardous waste (*Table 6*). If sufficient capacity has been achieved in North London, compensatory capacity should be provided elsewhere in London. If it can be demonstrated that there is sufficient capacity in London to meet London's apportionment and net self-sufficiency targets, it may be possible to justify the release of waste sites for other uses. During the Plan period, where waste sites shown in Schedule 1 are redeveloped for other uses, the amount and location of compensatory provision will be noted in the NLWP AMR (see IN2 in *Section 8*). Sites which are going to be redeveloped for other uses during the plan period are identified in Schedule 1 and should be excluded from the search criteria for potential sites for new or replacement waste facilities.

7.9 As set out within *Section 2*, a key Spatial Principle of the NLWP is to establish a geographical spread of waste sites across North London, consistent with the principles of sustainable development. The aim is to ensure that waste is managed efficiently and as close to its source as possible whilst minimising any negative cumulative impacts resulting from a high concentration of waste facilities. Avoiding an unduly high concentration of waste facilities in a location is consistent with the overarching objectives of sustainable development, identified within the NPPF and would leave land available for other uses. *Policy 2* identifies the Priority Areas for new waste management facilities and a sequential approach to site selection. The most suitable location for the re-provision of a site lost to non-waste development may therefore

7 Policies continued

not necessarily be within the same north London borough as the displaced site. Adequate evidence of compensatory provision will be required to the satisfaction of the local planning authority before planning permission for redevelopment proposing loss of a facility is granted.

7.10 Any sites that come forward and receive planning permission for waste development which are implemented in the lifetime of the NLWP will be regarded as existing waste sites in North London and safeguarded under the provisions of this Policy (1). As part of the monitoring of the plan, waste arisings (IN1) the tonnage of waste capacity available by management type and type of wastes handled (IN2) and the loss of existing waste capacity and provision of replacement capacity (IN4), will be monitored (see *Section 8*). The most up-to-date list of existing waste management sites will be found in the NLWP AMR. Where existing waste sites are lost, but compensatory provision has been made to the satisfaction of the Borough, this will be noted in the AMR. In time, the safeguarded designation will be removed from the relevant Borough's policies map.

7.11 *Policy 1* also seeks to protect existing and permitted waste sites from the influence of an incompatible use in close proximity prejudicing the continuation or further development of waste operations at that location. Waste facilities have an important role to play in ensuring that communities are sustainable. Identifying and safeguarding suitable sites for waste facilities is challenging with issues relating to public amenity, access, hydrology, and geology, amongst others, to consider. In addition, waste is a relatively 'low value' land use which, although capable of competing with other industrial type uses, cannot outbid higher value uses. The introduction of sensitive types of development nearby, such as housing, could have an adverse impact on the continued operation of the existing sites in North London and their ability to provide sufficient waste capacity as well as helping meet waste recycling, diversion and recovery targets. This would undermine the anticipated capacity of the network of existing facilities across North London to manage waste and consequently the overall deliverability of the NLWP. The NPPF and the London Plan sets out the 'Agent of Change' principle. This principle places the responsibility of mitigating the impact of noise, dust, vibration and other nuisance-generating activities (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 in that location, otherwise such developments will not be permitted. Accordingly proposed non-waste developments should be designed to protect both the amenity of potential new residential developments and the existing waste operation within that area.

7.12 Some existing waste sites may be having an adverse impact on surrounding uses such as schools and residential areas. The waste operator is responsible for ensuring that its regulated facility does not cause pollution of the environment and harm to human health. The operator's performance in relation to that responsibility is assessed by checking compliance with the terms and conditions of the permit. Environmental permits are issued by either the Environment Agency for large-scale facilities and those with greater risk to the environment (known as "A1 installations") or the local authority for smaller-scale facilities with lower risk to the environment (which include "A2 installations" and "Part B installations"). Local authorities hold a register of these permits which are available to view on request.

7.13 The responsibility for checking compliance falls to the issuer of the permit (the regulator). The Environmental Permitting Regulations (EPR) place a duty on regulators to undertake appropriate periodic inspections of regulated facilities. The EPR are the basis for any enforcement action and the principal offences are:

- operating a regulated facility without a permit;
- causing or knowingly permitting a water discharge activity or groundwater activity without a permit; and
- failing to comply with a permit condition, flood risk activity emergency works notice, flood risk remediation notice or an enforcement-related notice.

7 Policies continued

7.14 Operator competence can be considered by the regulator at any time, whether as part of the determination of an application or at any time during the life of the permit. The regulator can suspend or revoke the permit if an operator fails to comply with the conditions of the permit, risking harm to the environment or human health.

7.15 The North London Boroughs will monitor any enforcement action taken against waste operators (IN6) to ensure that existing waste facilities do not cause harm to the environment or local communities. This will be published as part of the NLWP Annual Monitoring Report. Any additional information on enforcement action can be requested from the regulator.

Policy 2: **Priority Areas for New Waste Management Facilities**

Areas listed in *Schedule 2: Priority Areas for waste management* and *Schedule 3: Priority Areas identified in LLDC Local Plan* are identified as suitable for built waste management facilities to meet the identified need set out in *Tables 5* and *7.*.

To help meet the spatial principle to create a better geographical spread of waste facilities in North London, developers should first seek sites in Priority Areas outside Enfield, and must demonstrate that no sites are available or suitable before considering sites within Enfield's Priority Area.

Applications for waste management development will be permitted on suitable land within the Priority Areas identified in Schedule 2 subject to other policies in the North London Waste Plan, the London Plan and Local Plans, and related guidance.

Development proposals will need to manage waste as far up the waste hierarchy as practicable. Development proposals for materials and waste management sites are encouraged where they deliver a range of complementary waste management and secondary material processing facilities on a single site.

Applications for waste management development within the Priority Areas identified in Schedule 3 will be assessed by the London Legacy Development Corporation.

This policy helps meet strategic objectives SO1, SO2, SO3 and SO5
This policy contributes towards Spatial Principles B, C and E

7 Policies continued

Schedule 2: **Priority Areas for Waste Management**

Area Ref	Area Name	Size (ha)	Borough	Waste Facility Type A	B	C	D	E
A02-BA	Oakleigh Road	0.99	Barnet	×		×		×
A03-BA	Brunswick Industrial Park	3.9	Barnet	×				×
A04-BA	Mill Hill Industrial Estate	0.9	Barnet	×				×
A05-BA	Connaught Business Centre	0.9	Barnet	×				×
A12-EN	Eley's Estate	26.1	Enfield	×	×	×	×	×
A15-HC	Millfields LSIS	1.48	Hackney					×
A19-HR	Brantwood Road	16.9	Haringey	×			×	×
A21-HR	North East Tottenham	15.32	Haringey	×			×	×
A22-HR	Friern Barnet Sewage Works/ Pinkham Way	5.95	Haringey	×	×			×
A24-WF	Argall Avenue	26.91	Waltham Forest	×	×			×

Schedule 3: **Schedule 3 Priority Areas identified in LLDC Local Plan**

Area Ref	Area Name	Size (ha)	Borough	Waste Facility Type A	B	C	D	E
LLDC1-HC	Bartrip Street LSIS	0.6	Hackney	×				×
LLDC2-HC	Chapman Road LSIS (Palace Close)	0.33	Hackney	×				×
LLDC3-WF	Temple Mill Lane	2.1	Waltham Forest	×	×			×

Table 13: **Key to Waste Management Facility Type**

Area Ref	Waste Facility Type
A	Recycling
B	Composting (including indoor/in-vessel composting)
C	Integrated resource recovery facilities/resource parks
D	Waste recovery or treatment facility (including thermal treatment, anaerobic digestion, pyrolysis/gasification, mechanical biological treatment)
E	Waste transfer

7.16 National and European requirements state that waste plans must identify locations where future waste development may take place. In addition, the London Plan requires boroughs to allocate sufficient land to provide capacity to manage apportioned waste. These Priority Areas have been assessed against national, regional and local criteria, including the Strategic Objectives and Spatial Principles, and represent the most suitable areas for new waste facilities in

7 Policies continued

North London. To help redress the high proportion of North London's waste facilities already in Enfield (62%), and help deliver a better geographical spread of sites (Spatial Principle B), developers wishing to provide additional waste capacity on a new site in North London are required to demonstrate that no land is available or suitable in Priority Areas outside of Enfield before considering the Priority Area identified within the Borough. This applies to additional capacity only and not to the expansion or intensification of existing waste sites or providing compensatory capacity for sites already in Enfield. The exception to this sequential approach to site search is for Recycling and Reuse Centres (RRCs) where there is an identified need in Enfield and Barnet to improve the coverage across North London (see *Policy 4*). The evidence will need to demonstrate an adequate search has been undertaken which takes into account the type of waste facility proposed, the criteria set out in *Table 10* and the criteria set out in *Policy 6*.

7.17 The NLWP data study has identified capacity gaps for waste management during the plan period for the preferred option of net self-sufficiency (in line with *Strategic Objective 3*). The purpose of *Policy 2* is to ensure that sufficient land is identified to accommodate built waste management facilities to deal with these identified capacity gaps for North London (in line with *Strategic Objective 2*).

7.18 In Schedules 2 and 3, the NLWP identifies thirteen Priority Areas to provide land suitable for the development of waste management facilities, including RRCs (see *Policy 4*). Each 'Priority Area' comprises an industrial estate or employment area that is in principle suitable for waste use. The identification of Priority Areas suitable for waste uses, subject to detailed site assessment at planning application stage, will help to achieve net self-sufficiency whilst encouraging co-location of facilities and complementary activities (an objective of the NPPW and Spatial Principle C). Areas listed in Schedule 2: Priority Areas for waste management and Schedule 3: Priority Areas identified in LLDC Local Plan suitable for new waste facilities will be identified in borough policies maps, and any new waste sites will be safeguarded and identified in borough policies maps.

7.19 The Priority Areas are considered to be in the most suitable, sustainable and deliverable locations in North London for new waste management facilities when assessed against a range of environmental, economic and social factors (see *Strategic Objective 5*) and the Spatial Principles. The location of new waste facilities and compensatory capacity will be monitored through Monitoring Indicator IN3.

7.20 Area profiles in *Appendix 2* are provided to assist developers who wish to build a waste facility in North London. The Profiles indicate the size of each Priority Area, the type of facility likely to be accommodated on the area, constraints, and any mitigation measures which may be required. Developers should be aware that any type of facility listed as potentially suitable is subject to consideration against the full suite of relevant local planning policies/guidance.

7.21 The ability of Priority Areas to accommodate a range of types and sizes of waste management facility is important to the flexibility of the Waste Plan. *Table 13:* Key to Waste Management Facility Types contains a full list of the types of facilities which were considered when assessing Areas and which may be required over the plan period to meet the identified capacity gap and to provide new sites for compensatory capacity. The facility types identified are broad categories which may come forward over the plan period. The order of facility types reflects their place in the waste hierarchy, with categories A and B at the 'recycling' level and C-E at the 'other recovery' level. Applicants should take account of this order when responding to the second criteria of *Policy 2* which requires development proposals to manage waste as far up the waste hierarchy as practicable in line with *Strategic Objective 1*.

7.22 The NLWP recognises that currently emerging or unknown waste management technologies, not listed in *Table 13* 'Key to Waste Facility Types', may be proposed during the plan period as new ways of treating waste come to the fore. As with all proposals, those for waste management technologies not listed will be assessed against the relevant NLWP policies, policies in the London Plan, Borough Local Plan policies and related guidance.

7 Policies continued

7.23 A full assessment of the suitability of the Priority Area for a facility type should be prepared by the developer to inform any development application for waste use. This will allow for a more detailed analysis and consideration of potential impacts associated with a specific proposal at the planning application stage.

7.24 In North London the most likely options for waste management will be recycling and recovery. The test of whether the proposed management is acceptable in terms of the waste hierarchy will be based on the type of waste and the treatment proposed and demand.

7.25 It is not within the remit of the NLWP to directly allocate sites/areas within the London Legacy Development Corporation (LLDC) planning authority area; this falls to the LLDC Local Plan. Therefore Schedule 3 sets out separately those Priority Areas identified in the LLDC Local Plan as being potentially suitable for built waste management facilities.

Policy 3: **Windfall Sites**

Applications for waste development on windfall sites outside of the existing sites and Priority Areas for new waste management facilities identified in Schedules 1, 2 and 3 will be permitted provided that the proposal can demonstrate that:

a) the sites and Priority Areas identified in Schedules 1, 2 and 3 are not available or suitable for the proposed use or the proposed site would be better suited to meeting the identified need having regard to the Spatial Principles;
b) sites have first been sought outside Enfield before sites within Enfield were considered, and that no sites outside Enfield are available or suitable, in line with Spatial Principle B;
c) the proposed site meets the criteria for built facilities used in the site selection process (see *Table 10* of *Section 5* of the NLWP) the proposal fits within the NLWP Spatial Principles, and contributes to the delivery of the NLWP aim and objectives;
d) future potential development including Opportunity Areas identified in the London Plan, and transport infrastructure improvements such as West Anglia Main Line, Four Tracking and Crossrail 2 would not be compromised by the proposals;
e) it is in line with relevant aims and policies in the NLWP, London Plan, Opportunity Area Planning Frameworks, Local Plans and related guidance; and
f) waste is being managed as far up the waste hierarchy as practicable

This policy helps meet strategic objectives SO2 and SO3
This policy contributes towards Spatial Principles B and C

7.26 The purpose of this policy is to ensure that development for new waste facilities on sites which do not form part of the planned strategy in the NLWP make a positive contribution to managing waste in North London. Windfall sites refer to locations which are not identified in Schedules 1-3 of this Plan. Windfall sites will cater for the needs of new waste facilities as well as those of displaced facilities lost under proposals considered under *Policy 1*. Windfall sites will also need to comply with *Policy 5* which applies to all proposed waste developments.

7.27 The search process for suitable potential locations for waste facilities has been extensive, thorough, and subject to public consultation, Equality Impact Assessment (EQIA), Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA). The Priority Areas identified in Schedules 2 and 3 meet the requirements of the Spatial Principles. However, there remains a possibility that sites not identified in the plan i.e. windfall sites may be brought forward by operators or landowners for waste development over the plan period.

7 Policies continued

7.28 Developers of windfall sites are required to demonstrate why it is not possible to use, expand or intensify an existing waste site set out in Schedule 1 or why sites in the Priority Areas in Schedules 2 and 3 are not available or suitable. In addition, to help address concerns that there is a high proportion of North London's waste facilities already in Enfield, and help deliver a better geographical spread of sites (Spatial Principle B), developers are required to demonstrate that no sites are available or suitable outside of Enfield before considering those within the Borough. The exception to this is for Recycling and Reuse Centres (RRCs) where there is an identified need in Enfield and Barnet to improve the coverage across North London (see *Policy 4*). The evidence will need to demonstrate an adequate search has been undertaken which takes into account the type of waste facility proposed, the criteria set out in *Table 10* and the criteria set out in *Policy 6*.

7.29 Developers proposing waste sites outside the Priority Areas will be expected to demonstrate that the proposed site would be better suited to meeting the identified need for North London having regard to delivering the Spatial Principles of the NLWP. For example a windfall site may deliver a better geographic spread of facilities in North London (Spatial Principle B), or there may be an opportunity to co-locate a recycling facility with a reprocessing plant (Spatial Principle C) or an opportunity for small scale expansion of an existing site onto adjacent land which helps facilitate the maximum use of an existing waste site and enable co-location of facilities. There may be instances in the future where advances in waste technologies are such that existing sites or Priority Areas do not meet the technical requirements of a proposed waste management facility, for example, the identified locations might be too small for the proposed development or the facility may need to be located near a specific waste producer or user of heat. Some of the Priority Areas identified in *Policy 2* may become unavailable over the Plan period because they will be used for other purposes or affected by future development proposals such as Crossrail 2 and Opportunity Areas. Locating certain types of waste processing sites within large scale redevelopment areas may also have benefits for reducing need for waste transport especially during the construction phase for the management of CDE. In addition, it is also recognised that proposals on windfall sites may come forward to provide capacity for displaced facilities from within the plan area where existing capacity needs to be re-provided locally and this need cannot be met through the existing allocations.

7.30 Proposals for waste development on windfall sites will be supported where the proposal would not compromise existing planning designations and where the impacts on communities and the environment can be satisfactorily controlled. In proposing a windfall site, developers will need to demonstrate that the spatial principles set out in *Section 2* have been considered, and in particular that the proposed site can deliver the spatial principle of balanced geographical distribution of waste facilities across North London, taking into account the concentration of existing waste sites in Enfield with reference to the NLWP Annual Monitoring Report.

7.31 Proposals for waste development on windfall sites should be in line with the London Plan, the NLWP, and Local Plans adopted by the North London boroughs. Proposals for waste facilities on windfall sites will need to demonstrate compliance with the same planning and spatial assessment criteria (*Table 10, Section 5*) used for the identification of sites and areas in the NLWP, and any other relevant material considerations, including the assessment criteria as set out within *Policy 5*. The windfall sites policy has been developed to ensure that any unplanned development contributes positively to future waste capacity in the plan area while not undermining the approach to development set out in the NLWP, the London Plan and Local Plans. Any waste development brought forward on a windfall site must meet the same high level of sustainability as the Priority Areas identified through the site and area selection process.

7.32 Applications for waste developments on windfall sites will need to demonstrate how the application supports delivery of the NLWP and assists in the aim of net self-sufficiency (*Strategic Objective 3*) by providing capacity that addresses the requirements of North London to manage more of its own waste or in providing replacement capacity for an existing facility which has been displaced. In line with the aim and objectives of the plan, planning applications will need to demonstrate that there will be social, economic and environmental benefits from the development and that amenity will be protected (*Strategic Objective 5*).

7 Policies continued

7.33 Historically, waste development has been concentrated within the east and west of North London. *Policy 3* provides an opportunity to develop a wider network of sites across the area, in line with the Spatial Principles. This policy allows new sites to come forward across the area where demand and commercial opportunity arise helping to provide a wider spread of facilities across the plan area in future.

7.34 There will be mixed use developments across North London within the period of the NLWP. The London Plan sets out a framework for development of new housing and employment together with the ancillary development necessary to sustain that development. Crossrail 2 will impact considerably on North London as mixed use development is expected to accumulate around Crossrail 2 stations.

7.35 In large scale redevelopment areas across the boroughs there is opportunity to plan for waste uses to form part of the master-planning process. In this way it should be possible to design-out any potential land use conflicts with non-waste uses in close proximity and support the agent of change principle as promoted by the London Plan. In such areas it may also be beneficial to allow temporary sites that can manage CDE waste generated as part of the redevelopment, subject to licencing and planning requirements.

7.36 In areas which contain a mixed use of employment and housing, suitable waste uses are likely to be re-use, repair or recycling uses. The following issues need special considerations when designing waste facilities into a mixed use area as part of the master planning process.

- How to minimise visual and acoustic nuisance from the site to residential properties and other uses, including utilising suitable screening, building orientation including avoiding residential units overlooking waste operations or vehicle site access points, and use of appropriate building materials.
- Impact of odour, dust and litter on local amenity – An Environmental Management Plan to be submitted in support of a planning application to be applied to prevent such impacts from becoming a nuisance;
- Access and traffic – consider the most appropriate route and timing for vehicles to access the waste facility and separation of access to avoid conflict with traffic and access associated with neighbouring uses.

These issues are considered in more detail in *Policy 5* including a presumption that waste uses will be enclosed.

7.37 *Strategic Objective 1* seeks to support movement of North London's waste as far up the waste hierarchy as practicable. The test of whether the proposed operations are acceptable in terms of the waste hierarchy will be based on the type of waste and the treatment proposed and demand.

Policy 4: **Re-use & Recycling Centres**
Proposals for Re-use & Recycling Centres will be permitted where: a) They improve the coverage of centres across the North London Boroughs, in particular in an area of identified need for new facilities in Barnet or Enfield and; b) They are in line with relevant aims and policies in the North London Waste Plan, London Plan, Local Plans and other related guidance.
This policy helps meet strategic objectives SO1, SO2 and SO3 **This policy contributes towards Spatial Principles A and B**

7 Policies continued

15 Household Waste Recycling Centre Policy, North London Waste Authority (June 2010)

7.38 Re-use & Recycling Centres (RRCs) provide members of the public with access to a wider range of recycling facilities and they also deal with bulky items. There are currently eight RRCs in North London of which seven are the responsibility of the North London Waste Authority (NLWA). They are safeguarded for waste use under *Policy 1*. The NLWA has identified areas of deficiency in coverage in parts of Barnet and Enfield and is seeking to address this by providing new or replacement sites so that 95% of residents live within two miles (measured as a straight line) of a facility[15] – see *Figure 6*. The NLWA is also proposing a new RRC on the Edmonton EcoPark site as part of its current Development Consent Order (DCO) application on the site. The Spatial Principles seek a network of waste sites across North London and, as part of this aim, to ensure residents have good access to RRCs where there is an identified need.

7.39 Re-use & Recycling Centres should be located where they can provide appropriate access for members of the public and for contractors and their vehicles. They are best sited on former waste sites or in areas of industrial or employment land and need to be of a sufficient size for the range and quantity of materials likely to be received. Sites and areas identified in Schedules 1, 2 and 3 are likely to be the most suitable locations, and *Policy 3*: Windfall Sites will apply to any application for an RRC outside of these areas. There may be scope to provide localised recycling centres as part of major new development.

Policy 5: **Assessment Criteria for Waste Management Facilities and Related Development**

Applications for waste management facilities and related development, including those replacing or expanding existing sites, will be required to demonstrate to the satisfaction of the relevant Borough that:

a) the amenity of local residents is protected;
b) the proposal maximises the waste management capacity of the site;
c) the facility will be enclosed unless justification can be provided by the developer that an equivalent level of protection can be permanently achieved by other means;
d) adequate means of controlling noise, vibration, dust, litter, vermin, odours, air and water-borne contaminants and other emissions are incorporated into the scheme;
e) there is no significant adverse effect on any established, permitted or allocated land uses likely to be affected by the development;
f) the development is of a scale, form and character in keeping with its location and incorporates appropriate high quality design;
g) there is no significant adverse impact on open spaces or land in recreational use or landscape character of the area including the Lee Valley Regional Park;
h) heritage assets and their settings are conserved and where appropriate enhanced;
i) active consideration has been given to the transportation of waste by modes other than road, principally by water and rail;
j) there are no significant adverse transport effects outside or inside the site as a result of the development;
k) the development avoids increasing the levels of vulnerability to climate change, makes appropriate adaptation and mitigation measures to achieve this, and helps reduce greenhouse gas emissions;
l) the development has no adverse effect on the integrity of an area designated under the Habitats Directive and no significant adverse effect on local biodiversity or water quality;
m) there will be no significant impact on the quality of underlying soils, surface or groundwater;
n) the development has no adverse impact on Flood Risk on or off site and aims to reduce risk where possible;
o) there is no adverse impact on health;
p) there are no significant adverse effects resulting from cumulative impact of any proposed waste management development upon amenity, the economy, the natural and the built environment either in relation to the collective effect of different impacts of an individual proposal, or in relation to the effects of a number of waste developments occurring concurrently or successively;

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7 Policies continued

16 This requirement is an issue for all development and waste applications should provide details as to how they will meet these objectives

q) there are job creation and social value benefits, including skills, training and apprenticeship opportunities[16];
r) the proposal is supported by a Circular Economy Statement.

This policy helps meet strategic objectives SO4, SO5, SO6, SO7 and SO8
This policy contributes towards Spatial Principles C, E and F

7.40 *Policy 5* seeks to ensure that the construction and operation of waste facilities does not give rise to an unacceptable impact on health or harm the amenity of local residents or the environment. Amenity is defined as any element providing positive attributes to the local area and its residents and impacts can include such issues as, but not limited to, increased levels of local air pollution, increased noise disturbance, light impacts including increased light or reduced light or sunlight, reduced privacy, loss of outlook and reduced visual amenity. Applicants will need to demonstrate that appropriate measures and/or Best Available Techniques (BAT) (where applicable) have been taken to minimise any potential impacts from the proposed waste development to ensure the protection of local amenity and health. The specific requirements will vary from site to site, however issues to be addressed may include strict hours of operation, effective cladding on buildings to prevent noise pollution, and dust and odour suppression systems as appropriate. These issues are discussed in more detail below. *Policy 5* helps deliver a number of the *Strategic Objectives*, including *SO4* which seeks high standards of design, *SO5* which seeks to integrate social, environmental and economic considerations, *SO6* which seeks a low carbon economy, *SO7* which supports the use of sustainable forms of transport, and *SO8* which seeks to protect the natural environment, biodiversity, cultural and historic environment.

7.41 London Plan policy SI8 promotes capacity increases at waste sites and where appropriate to maximise their use. In order to demonstrate that North London's land is being used to its highest potential, developers are required to provide evidence that the waste management capacity on a site has been optimised. This could be in reference to similar facilities operating to a high standard.

7.42 Waste facilities can be separated into 'enclosed' facilities, where waste is processed inside a building and 'open' facilities, which largely deal with waste in the open air. Waste facilities are often seen as bad neighbours, due to problems associated with open air facilities. It is current best practice that the operations are carried out within a covered building enclosed on all vertical sides with access and egress points covered by fast acting doors which default close in order to minimise local public health and environmental impact. Such enclosed facilities are similar in appearance to modern industrial shed developments such as factories or logistics facilities. 'Open' facilities are unlikely to be suitable for North London as outlined in the *Section 2* of the Plan except in exceptional circumstances. There are types of waste development for specific waste streams or waste types that may not need to or should not be enclosed but any activity likely to cause dust should be carried out within a building or enclosure. Enclosing waste management facilities not only results in less dust and particulate pollution but will also reduce the risk of pollution caused from other amenity issues such as noise, pests and odour. Noise, vibration, dust, litter, vermin, odours, air and water-borne contaminants, other emissions and their potential health impacts have been a major concern raised through public consultation. However, well sited, and well managed facilities should not cause harm or disturbance. Details of controls for emissions (including bio aerosols) from the site need to be supplied with the application. Planning conditions and *Section 106* agreements will be used to secure measures to address any issues where necessary and where control is not already exercised through other consent regimes (i.e. the requirement for environmental permits, which is assessed by the Environment Agency). Applicants will be expected to comply with Borough policies on contaminated land. The North London Boroughs require that any development can safely complement surrounding uses.

7.43 The North London boroughs expect well controlled and well-designed waste facilities capable of fitting in with surrounding land uses and acting as good neighbours. Where development is proposed close to residential areas, in line

7 Policies continued

17 Designing waste facilities – a guide to modern design in waste, Defra & CABE, 2008
18 This can be achieved through provision of wheel wash facilities etc where required and placing conditions of the applications to ensure all vehicles are covered

with *Strategic Objective 4* and the agent of change principle, the design must incorporate noise reduction measures as well as dust and odour suppression as necessary. It should be designed to minimise its impact on the local area and ensure it is compatible with existing surrounding land uses. When assessing planning applications for waste uses, in addition to *Policy 5*, the boroughs will also have regard to the criteria in Appendix B of the NPPW and relevant London Plan and Local Plan policies. Applicants are required to submit sufficient information to enable the waste planning authority within which the subject site falls to assess the potential impact of the development proposal on all interests of acknowledged importance. Applicants are encouraged to contact the relevant borough prior to submitting a planning application to discuss relevant matters. Where new waste development is being sited near existing waste sites, developers will be expected to consider potential cumulative impacts as well as also demonstrating any possible benefits of co-locating waste development (in line with Spatial Principle C). Good design is fundamental to the development of high quality waste infrastructure and, to deliver *Strategic Objective 4*, the North London Boroughs seek approaches that deliver high quality designs and safe and inclusive environments. The documents submitted in support of the planning application should set out how the development takes on board good practice such as the Defra/CABE guidance on designing waste facilities[17]. The supporting documents should set out how the siting and appearance complements the existing topography and vegetation. Materials and colouring need to be appropriate to the location. The development should be designed to be in keeping with the local area and include mechanisms for reducing highway deposits[18], noise and other emissions where necessary.

7.44 The supporting documents should set out how landscape proposals can be incorporated as an integral part of the overall development of the site and how the development contributes to the quality of the wider urban environment. The applicant will need to demonstrate that there will be no significant adverse effect on areas or features of landscape or nature conservation value. Where relevant, applications for waste management facilities and related development will be required to demonstrate that they conserve and, where appropriate, enhance heritage assets and their settings including consideration of non-designated archaeology where relevant in line with the NPPF.

7.45 Where sites include, or are likely to have an impact on, the setting of a heritage asset both designated (Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, Registered Historic Parks and Gardens and Battlefields) and undesignated, including archaeology, it should be demonstrated that the development will conserve the significance of the asset. Where the site has potential to include assets with archaeological interest, such as if it is in an archaeological area identified in a Borough Local Plan or may affect a site recorded on the Greater London Historic Environment Record, an appropriate desk based assessment and, where necessary, a field evaluation, is required to accompany the planning application. Where such an assessment and evaluation confirms significant archaeological interest then appropriate mitigation by design or investigation is also required.

7.46 A large part of the Lee Valley Regional Park (1483 ha) falls within four of the North London Boroughs involved in the Plan; Waltham Forest, Haringey, Enfield and Hackney. New development should contribute to the protection, enhancement and development of the Regional Park as a world class visitor destination and the wider public enjoyment of its leisure, nature conservation, recreational and sporting resources. The Lee Valley is a significant resource for North London and developments should not have an adverse effect on the open space and character of the area, and should aim to contribute to its enhancement where appropriate.

7.47 Waste and recyclables require transportation at various stages of their collection and management and so opportunities to employ more sustainable options such as rail and river should be fully considered. *Strategic Objective 7* supports the use of sustainable forms of transport and minimise the impacts of waste movements including on climate change. North London is characterised by heavy traffic on all principal roads. That is why developers need to prioritise non-road forms of transport if at all possible and to set out their assessment of sustainable transport options in a Transport Assessment detailing transport issues to be submitted with any planning applications for waste facilities

7 Policies continued

(see below). In North London there exists considerable potential for sustainable transport of waste as part of the waste management process. There are a number of railway lines and navigable waterways in North London including the Regents Canal and the Lee Navigation. It is existing practice to transport waste by train and pilot projects have taken place to transport waste by water. Developers are required to demonstrate that they have considered the potential to use water and rail to transport waste before reliance on transport of waste by road. Where the site lies adjacent to a wharf or waterway, capable of transporting waste, developers need to demonstrate that consideration has been given to the provision and/or enhancement of wharf facilities. This will be monitored through Monitoring Indicator IN5 (see *Section 8*). Waste transfer activities that do take advantage of rail and or boat transportation must also ensure that they design their site and meet the standards required by all waste management sites stated in this Plan.

7.48 Applicants will need to submit a Transport Assessment in line with the relevant borough Local Plan policy and the London Plan. The Transport for London Best Practice Guide contains advice on preparing Transport Assessments when they are required to be submitted with planning applications for major developments in London. Consideration should be given to access arrangements, safety and health hazards for other road users, the capacity of local and strategic road networks, impacts on existing highway conditions in terms of traffic congestion and parking, on-site vehicle manoeuvring, parking and loading/unloading areas, and queuing of vehicles. The Assessment should include a traffic management plan establishing the times of access for vehicles to minimise disruption on the local road network during peak hours, and setting out specific routes to ensure that vehicles are accessing the site via roads considered suitable by the Highways Authority and, where possible, avoid overlooking of the site access by residential properties. The Assessment should cover the types of vehicles to be used, including opportunities to use ultra-low and zero emission vehicles, alternatives to vehicles powered by the internal combustion engine, and the provision of any infrastructure at future or expanded waste sites to accommodate this. The statement should also cover emission standards and fuel types in line with national and regional air quality standards.

7.49 The development of Servicing and Delivery Plans and Construction Logistic Plans (CLP) will be encouraged for all waste developments. Such Plans ensure that developments provide for safe, efficient and legal delivery and collection, construction and servicing including minimising the risk of collision with vulnerable road users such as cyclists and pedestrians. Consideration should be given to the use of Direct Vision Lorries for all waste vehicles in line with the Mayor's Vision Zero Action Plan, and the use of freight operators who can demonstrate their commitment to TfL's Freight Operator Recognition Scheme (FORS) or similar. Developers need to demonstrate that they can operate servicing and deliveries in the most efficient way that makes best use of transport movements that are made.

7.50 Sustainable design, construction and operation of waste management development will be assessed against relevant Development Plan policies. In line with *Strategic Objective 6*, consideration should be given to how the development contributes to the mitigation of and adaption to climate change, promotes energy and resource efficiency during construction and operation with the aim of developments being carbon neutral, the layout and orientation of the site and the energy and materials to be used. Developments should achieve the highest possible standard under an approved sustainability metric such as BREEAM or CEEQUAL in line with the relevant borough's policies. Information supplied should enable the borough in question to assess the proposal against relevant planning policies by clearly setting out how the application complies with sustainable design and construction policies and guidance including measureable outputs where appropriate. Where appropriate, production of a site waste management plan should be provided prior to the commencement of construction of the development.

7.51 Criteria 5l seeks to protect and enhance local biodiversity. Development proposals will be assessed against this policy as well as other relevant principles and policies set out in the NPPF and Borough Local Plans. Development that would have an adverse effect on any area designated under the Habitats Directive will not be permitted. Assessments undertaken for the Plan have identified sites of European Community importance within and nearby the Plan area. Sites

7 Policies continued

at least partially within the Plan boundary are the Lee Valley Special Protection Area (SPA) and RAMSAR site and part of Epping Forest Special Area for Conservation (SAC). Additional sites at least partially within 10 km of the Plan area boundary are Wormley-Hoddesdon Park Woods SAC and Wimbledon Common SAC3. Developers need to be able to demonstrate that their proposals will not have an adverse effect on the integrity of any European site. In addition there are six Sites of Special Scientific Interest and 20 Local Nature Reserves as well as sites of importance to nature conservation (SINC). Developers should take note of existing Biodiversity Action Plans, protect existing features and promote enhancement for example through the use of green walls where acoustic barriers are required. Where a development site is adjacent to a river the Environment Agency has advised that a setback of a minimum of 8 metres from the top of the bank should be incorporated into any redevelopment proposals. Consistent with this advice, setting back waste management development (not including wharf development) from watercourses and providing an undeveloped buffer zone free from built structures will be important for maintaining access to the river, to allow the landowner access for routine maintenance activities and for the Environment Agency to carry out Flood Defence duties. Maintaining a sufficient wildlife and riverside corridor is also important for minimising the potential adverse impacts to the water quality and riverine habitats. This will provide opportunities for flood risk management in line with the Environment Agency Catchment Flood Management Plans. Opportunities for river restoration through the development of sites should also be encouraged to ensure compliance with requirements under the Water Framework Directive and the Thames River Basin Management Plan.

7.52 There are a number of groundwater source protection zones in North London to protect drinking water supplies and prevent contamination of aquifers. Source protection zone 1 boundaries are defined in the immediate area of boreholes and other abstraction points. Waste facilities may be permitted in source protection zone 1 provided that any liquid waste they may contain or generate or any pollutants they might leach, especially if hazardous, do not pose an unacceptable risk to groundwater. A groundwater risk assessment will be required. Soil quality will need to be protected from potential adverse impact by certain operations, such as open windrow composting. The following waste facilities are considered lower risk and are more likely to be acceptable:

- Energy from Waste ;
- In-Vessel Composting activities;
- Mechanical Biological Treatment;
- Materials Recycling Facility (dry wastes only), and;
- Waste Electrical and Electronic Equipment (WEEE) sites that exclude potentially polluting wastes.

7.53 Higher risk waste uses are less likely to be acceptable in source protection zone 1. Early liaison with the Environment Agency is encouraged.

7.54 Source protection zone 2 covers a wider area around an abstraction point. Where developments are proposed in source protection zone 2, a risk assessment will be required and any waste operation apart from landfill may be considered. Where sites are in source protection zones, developers are encouraged to engage in early discussions with the Environment Agency.

7.55 The North London Strategic Flood Risk Assessment (SFRA) and individual borough 'Level 2' SFRAs have demonstrated the current risks from flooding from all sources of flood risk across North London and site specific flooding assessments have been undertaken on Priority Areas in schedules 2 and 3. Where a site is near or adjacent to areas of flood risk, the development is expected to contribute through design to a reduction in flood risk, making as much use as possible of natural flood management techniques, and be appropriately flood resistant and resilient in line with the NPPF and NPPG. Development proposals will be required to assess the impact of climate change using the latest published climate change allowances, mitigate to the appropriate future flooding scenario using these allowances.

7 Policies continued

A sequential approach to the layout of the site should be taken aiming to locate development in the parts of the site at lowest risk of flooding from any source. Waste facilities are often characterised by large areas of hardstanding for vehicles and large roof areas. Development proposals will be required to show that flood risk would not be increased as part of the scheme and, where possible, will be reduced overall through the use of Sustainable Drainage Systems (SuDS) and other techniques. Any proposed development should be reviewed by the Environment Agency at an early stage to discuss the reduction of flood risk on the site.

7.56 Developers of waste facilities will need to fully identify the health implications of the development and plan the most appropriate scheme to protect the surrounding uses and community. Any proposed waste development which is required to have an Environmental Impact Assessment will also require a Health Impact Assessment.

7.57 Paragraph 5 of the National Planning Policy for Waste (NPPW) requires consideration be given to:
"*The cumulative effect of existing and proposed waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential*".

7.58 Cumulative impacts relate to the way in which different impacts can affect a particular environmental resource or location incrementally, for example, combined noise, dust and traffic emissions on a dwelling from a new road scheme. In essence, cumulative impacts are those which result from incremental changes caused by other past, present or reasonable foreseeable actions together with the proposed development. Therefore, the potential impacts of the proposed development cannot be considered in isolation but must be considered in addition to impacts already arising from existing or planned development.

7.59 In determining an application for a new waste facility, account will normally be taken of the potential cumulative impact of waste management and other development within the locality and in particular the area's capacity to absorb that change. Factors to be taken into account will include; the nature of the waste and the process involved; the direction of the prevailing wind; the amount of enclosure for the processes; use of odour neutralisation and minimisation; measures for dust control; the number of persons affected by the development and its duration; the effects on amenity that pollution would cause; local topography providing natural screening; the extent of noise and vibration generated by the operations; the proposed hours of working; and the impact of flood-lighting. In some instances, the combined impact of development over a sustained period of time may be sufficient to warrant refusal of planning permission. However it is acknowledged that cumulative impacts can have positive impacts through synergies with other local waste uses and businesses in the area. Such synergies may lead to fewer road miles for waste as well as the potential development of green industry hubs attracting more highly skilled and technical jobs. Proposals should seek to make a positive contribution to improving issues of deprivation and inequality within local communities. Where an area has historically hosted significant waste infrastructure and is moving towards regeneration initiatives to improve its economic and investment potential, the cumulative impact on these regeneration activities should be considered when waste development is proposed, especially where the benefits of co-location and economies of scale are outweighed by a resultant reduction in land values, employment opportunities and regeneration potential. In these circumstances where development takes place, opportunities to address inequalities should be taken up in order to promote a better spatial distribution of facilities and avoid undue concentration of waste uses.

7.60 As stated throughout this document applications will be assessed against the full suite of relevant national, London Plan and Local Plan policies and guidance. However, given the status of the NLWP as a multi-Borough DPD which will form part of the Local Plan of each of the seven Boroughs, *Policy 5* is a valuable signpost to impacts that will be considered in the determination of applications and will help deliver *Strategic Objective 5* which seeks to ensure the delivery of sustainable waste development within the Plan area through the integration of social, environmental and economic considerations.

7 Policies continued

19 London Heat Map – www.londonheatmap.org.uk

7.61 As part of the application, and in line with policies in the borough local plan, developers should give details of the jobs created as a result of the new development, the level of skills required and the availability of training and apprenticeship opportunities. Developers should seek to meet the aspirations of borough economic and employment strategies and make a positive contribution to the local economy.

7.62 As part of the Circular London programme, LWARB published a Circular Economy Route Map in June 2017. The Route Map recommends actions for a wide range of stakeholders, including London's higher education, digital and community sectors as well as London's businesses, social enterprises and its finance sector. Developers should submit a Circular Economy Statement in line with the London Plan and guidance issued by the Mayor.

Policy 6: **Energy Recovery and Decentralised Energy**

Where waste cannot be managed at a higher level in the waste hierarchy waste developments are required to generate energy, recover excess heat and provide a supply to networks including decentralised energy networks unless it is not technically feasible or economically viable to do so. Developers must demonstrate how they meet these requirements as part of a submitted Energy Statement. Where there is no available decentralised energy network and no network is planned within range of the development, as a minimum requirement the proposal should recover energy through electricity production and be designed to enable it to deliver heat and/or energy and connect to a Decentralised Energy Network in the future.

This policy helps meet strategic objectives SO1 and SO6
This policy contributes towards Spatial Principle D

7.63 Tackling climate change is a key Government priority for the planning system and a critical new driver for waste management. The purpose of this policy is to ensure that applications for waste management facilities incorporate opportunities for sustainable energy recovery and combined heat and power (CHP) where feasible and practicable. The policy helps deliver *Strategic Objective 6* to provide opportunities for North London to contribute to the development of a low carbon economy and decentralised energy. The policy complements more detailed policies in borough Local Plans on financial contributions relating to feasibility, sustainable design, CHP and development of heat networks, against which applications will also be considered.

7.64 The NPPW and the London Plan both recognise the benefits to be gained from any energy from waste facility to capture both heat and power, and encourage all developments of this kind to achieve that end.

7.65 National policy for renewable energy says that Local Development Documents, such as the NLWP, should contain policies that promote and encourage, rather than restrict, the development of renewable energy resources. The London Plan includes minimum performance for technologies for generating energy from London's waste, known as the carbon intensity floor. This has been set at 400 grams of CO_2 eq generated per kilowatt hour (kwh) of electricity generated.

7.66 The GLA has committed to working with London Boroughs and partners in the private sector to develop opportunities by providing assistance for commercialisation of large decentralised energy projects. Opportunities for district heating were identified across London as part of the Decentralised Energy Master Planning programme led by the GLA in 2008-2010[19]. The programme initially focused on identifying opportunities for district heating networks through heat mapping and energy masterplanning with the London Boroughs.

7 Policies continued

7.67 Work is already underway to progress the delivery of a decentralised network in the Lee Valley known as Meridian Water. Meridian Water will capture affordable low carbon heat from waste to energy facilities and combined heat and power plants, supplying it to buildings and industry across the Lee Valley. Meridian Water is requesting hot water to be supplied for the energy from waste facility (EfW) at Edmonton EcoPark. However, over time, the network will connect additional heat sources, including other waste developments, elsewhere in the Lee Valley. Any future development, including the current plan for Meridian Water should ensure that the openness and permanence of the Green Belt is maintained in accordance with London Plan Policy G2.

7.68 The Boroughs will monitor the success of this policy through Monitoring Indicator IN8 which is the number of new CHP facilities serving district heat networks in which the principal fuel source is residual waste or recovered waste fuel.

Policy 7: **Waste Water Treatment Works and Sewage Plant**

Proposals for the provision of new facilities for the management, treatment and disposal of wastewater and sewage sludge will be permitted, provided that:

- it is demonstrated that there is an identified need for such a facility within the North London Waste Plan area, which cannot be met through existing waste facilities; and
- the proposals meet the other policies of this North London Waste Plan together with all other relevant policies of the appropriate borough's Development Plan.

This policy helps meet strategic objectives SO1, SO2 and SO5
This policy contributes towards Spatial Principles A and B

7.69 Waste Water Treatment Works in North London are operated by Thames Water, with the main facility being Deephams Sewage Treatment Works (STW), which is the ninth largest in England. Works to Deephams STW to provide sufficient capacity to meet Thames Water's projections of future requirements into the next decade were largely constructed by March 2017 and completed during 2018/2019. The upgrade increased capacity from a Population Equivalent (PE) of 891,000 (as at 2011) to 989,000 PE. At the time the upgrade was designed (in line with population predictions at the time) it was envisaged the upgrade will accommodate population growth up until at least 2031. However, treatment capacity will be reviewed in future AMP periods to ensure ongoing capacity in relation to changing population growth predictions.

7.70 The Environment Agency has issued a significantly tighter environmental permit that came into force in March 2017 and required Thames Water to make improvements to the quality of the discharged effluent. The need for an effluent upgrade to Deephams STW is highlighted in the National Planning Statement on Waste Water, and planning permission for this work was granted by Enfield Council in 2015. The site is to be retained for waste water use and Thames Water anticipates that the approved recent upgrade to Deephams STW will provide sufficient effluent treatment capacity to meet their needs into the next decade.

7.71 The boroughs will work with Thames Water and the Environment Agency to ensure that adequate and appropriate waste water treatment infrastructure is provided to meet environmental standards and planned demand. In September 2014 the Government approved plans to build the Thames Tideway Tunnel – a 25km conduit flowing beneath the Thames which would provide collection, storage and transfer capacity for waste water and rainwater discharge from a significant part of Central London. Construction began in 2018 with completion scheduled for 2023. Once completed the new tunnel will be connected to the Lee Tunnel which will transfer sewage to the expanded Beckton Sewage Treatment complex. The proposal has indirect implications for the Plan area in that it will benefit from the additional capacity and this will relieve pressure for further expansion of local Waste Water Treatment Works.

7 Policies continued

7.72 Any other new waste water and sewage treatment plants, extensions to existing works, or facilities for the co-disposal of sewage with other wastes will be supported where the location minimises any adverse environmental or other impact that the development would be likely to give rise to, and the suitability of the site can be justified in accordance with this Plan. The Plan has a supporting role to identify suitable locations for additional infrastructure.

7.73 The Boroughs will monitor the success of this policy through Monitoring Indicator IN9.

Policy 8: **Inert Waste**

Inert waste should be managed as far up the waste hierarchy as possible, including on-site recycling and reuse of such material.

Proposals for development using inert waste will be permitted where the proposal is for beneficial use, including but not limited to:

a) Restoring former mineral working sites; or
b) Facilitating an improvement in the quality of land; or
c) Facilitating the establishment of an appropriate use in line with other policies in the Local Plan; or
d) Improving land damaged or degraded as a result of existing uses and where no other satisfactory means exist to secure the necessary improvement.

All proposals using inert waste should:

a) Incorporate finished levels that are compatible with the surrounding landscape. The finished levels should be the minimum required to ensure satisfactory restoration of the land for an agreed after-use; and
b) Include proposals for high quality restoration and aftercare of the site, taking account of the opportunities for enhancing the overall quality of the environment and the wider benefits that the site may offer, including biodiversity enhancement, geological conservation and increased public accessibility.

Proposals for inert waste disposal to land will not be permitted if it can be demonstrated that the waste can be managed through recovery operations.

This policy helps meet strategic objectives SO1, SO2 and SO3
This policy contributes towards Spatial Principles B

7.74 Construction, demolition and excavation waste is largely made up of inert construction waste, such as bricks and hardcore which can be used in site restoration and land reclamation projects.

7.75 Recycling and reuse of inert waste applications for all types of development should demonstrate that viable opportunities to minimise construction and demolition waste disposal will be taken, making use of existing industry codes of practice and protocols, site waste management plans and relevant permits and exemptions issued by the Environment Agency.

7.76 Inert waste materials can be an important resource and should be used for beneficial purposes, such as the restoration of mineral sites and in engineering works, or at other 'exempt sites' rather than disposed of at inert landfill sites. A definition of 'beneficial uses' can be found in the London Plan. Increased use of recycled and secondary aggregates can reduce the need and demand for primary aggregates extraction. Site operators will need to conform to the 'Aggregates from inert waste Quality Protocol' document to achieve 'end of waste' status. If this cannot be achieved and/or the

7 Policies continued

operator cannot prove compliance with the protocol, then the material will not have achieved 'end of waste' status and will still be considered a waste and subject to controlled waste legislation. There is no 'end of waste' criteria for soil so this will always be viewed as a waste once it has become a controlled waste outside of the Definition of Waste Code of Practice.

7.77 Inert waste will continue to be deposited to land where it is reused for beneficial purposes, including within engineering schemes, for the restoration of mineral workings, and for agricultural improvement. Recycling and recovery are the preferred methods of management and inert waste should only be disposed of to land as a last resort, consistent with the waste hierarchy (see *Strategic Objective 1*).

7.78 Proposals on unallocated sites for the recycling of inert waste will be permitted where it can be demonstrated that there is a market need, consistent with the principle of net self-sufficiency.

7.79 There should be a clear benefit or benefits from the proposed development. This should be a benefit to the site itself, for example, the use of residual inert material associated with the restoration of an active or dormant mineral working, the restoration of a former mineral working to agriculture or an engineering operation for the provision of a new leisure facility. However, given the likely disturbance to local communities and the local environment, for example, due to the movement of HGVs, there should be benefits for the wider area, for example, through environmental improvement or the creation of new public rights of way.

Technology inside an Energy Recovery Facility

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8 Monitoring and Implementation

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8 Monitoring and Implementation

Monitoring the Plan

8.1 The Planning and Compulsory Purchase Act (2004) requires planning authorities to monitor and report annually on whether the Aims and Objectives of all local plans (whether prepared individually or in conjunction with other authorities) are being achieved (paragraph 35). The NPPW identifies the need to monitor and report on the take-up of sites in Priority Areas; changes in the available waste management capacity as a result of closures and new permissions; and the quantities of waste being created locally and how much is being managed at different levels in the waste hierarchy i.e. recycling/composting, recovery, and disposal.

8.2 Monitoring is also required to check on whether the intending policy outcomes of the NLWP are being delivered and whether the identified capacity gaps are being met through the Priority Areas listed in *Policy 2* Schedules 2 and 3. Monitoring will also ensure that sufficient identified land remains available for new facilities during the plan period which is also likely to see intense competition for land for other uses especially housing. The results of monitoring will also play an important role in informing Development Management decisions when authorities determine planning applications for new waste facilities.

8.3 Responsibility for monitoring lies with the individual boroughs. However, the boroughs have agreed to monitor the Plan jointly through a lead borough agreement. Data will be collated and included in a joint NLWP Monitoring Report which will be produced annually.

8.4 To supplement the boroughs' annual monitoring, it will be important for the GLA to monitor London Plan waste Policies and gather data in partnership with the boroughs on waste arisings, waste management capacity, both within London and landfill outside of London.

Proposed Monitoring Framework

8.5 The aim of monitoring is to check whether the policy framework in the NLWP is working as intended. The proposed monitoring indicators reflect a number of National Indicators and also the statutory and non-statutory performance targets including those set by the EU, the NPPW and the London Plan. The list of indicators is not intended to be exhaustive and is intentionally focused on parameters where it is possible to evaluate the effect of the NLWP. For example, an indicator reporting on the number of times air quality thresholds were exceeded is of little use if the contribution of waste management facilities and transport of waste cannot be differentiated from those of other activities.

8.6 *Table 14* sets out the monitoring indicators proposed for each policy in the NLWP and identifies targets where appropriate. In some cases it will only be necessary to monitor (i.e. count the number of instances of) what has happened in the preceding year. In line with statutory requirements, the North London boroughs will review the plan every five years. If any targets are not being met the boroughs will assess where changes can and should be made.

8 Monitoring and Implementation continued

Table 14: **NLWP Monitoring Indicators**

	Indicator	Target(s)	What it Monitors	Outcome(s) Sought
IN1	Waste arisings (*Table 6*) by waste stream and management route	Waste arisings and management in line with forecasts in *Table 6* (Baseline *Table 3*)	Strategic Aim (capacity supply and self-sufficiency) Strategic Aim (move waste up Waste Hierarchy) SO1 (resource efficiency) SO3 (net self-sufficiency) Meeting Future Requirements as specified in the NLWP % waste diverted and % landfilled	To check that the NLWP is planning for the right amount of waste
IN2	Waste management capacity (*Table 8*) by waste stream and management route, including existing capacity, new capacity, loss of capacity, compensatory capacity and capacity gaps	Capacity to meet net self-sufficiency targets in *Tables 6* and *8* Zero loss of capacity Replacement, within North London Replacement capacity for Brent Cross Cricklewood provided within Barnet	Strategic Aim (capacity supply and self-sufficiency) Strategic Aim (move waste up Waste Hierarchy) SO1 (resource efficiency) SO3 (net self-sufficiency) Meeting Future Requirements as specified in the NLWP *Policy 2*: Priority Areas for New Waste Management Facilities *Policy 3*: Windfall Sites *Policy 4*. Reuse and Recycling Centres *Policy 7* Waste Water Treatment Works and Sewage Plant *Policy 8* Control of Inert Waste	To check that capacity is increasing to meet net self-sufficiency targets Ensure that capacity is replaced locally unless net self-sufficiency has been met
IN3	Location of new waste facilities and compensatory capacity	Land within Schedules 1, 2, 3	SO2 (capacity provision) *Policy 1*: Existing Waste Management Sites *Policy 2*: Priority Areas for New Waste Management Facilities *Policy 3*: Windfall Sites	To check that sites in Priority Areas are being taken up as anticipated To monitor if land within Schedules 1, 2 and 3 is not available or suitable for new waste facilities

8 Monitoring and Implementation continued

Table 14: **NLWP Monitoring Indicators** continued

	Indicator	Target(s)	What it Monitors	Outcome(s) Sought
IN4	Sites in Schedule 1 and Priority Areas in Schedules 2 and 3 lost to other non-industrial uses through a major regeneration scheme or designated for non-industrial uses in a review of the London Plan or Local Plan	Less than 25% of land lost If 50% of land is lost this will trigger review of plan	*Policy 2*: Priority Areas for New Waste Management Facilities	To check that identified land is sufficient to deliver the plan's aims To ensure sufficient existing capacity remains for managing the levels of waste expected across North London over the plan period as set out in *Table 8*
IN5	The number of sites consented that offer non-road transport options, the number of those sites where such options have been implemented and the total tonnage transported through non-road options (where known)	Facilities where non-road forms of transport are used to move waste and recycling	SO5 (sustainability) SO7 (sustainable transport) Spatial Principle F (sustainable transport)	Reduce impact on climate change Improve amenity
IN6	Enforcement action taken against waste sites by the local authority and/or Environment Agency on breach of planning conditions or environmental permit	Zero	SO5 (sustainability) SO8 (protect the environment) Spatial Principles (Reduce impact on amenity) *Policy 5*: Assessment Criteria for Waste Management Facilities and Related Development	To ensure sites do not cause harm to the environment or local communities
IN7	Amount of waste imported and exported by waste stream and management route	Exported waste to landfill in line with *Table 6* of the NLWP Reduction in waste exports	Net self-sufficiency Changes to imports and exports	Waste exports are in line with those estimated in the NLWP and through the duty to co-operate
IN8	Number of new CHP facilities serving district heat networks in which the principal fuel source is residual waste or recovered waste fuel	Monitor only	Strategic Aim (green London)	Monitor only
IN9	Sufficient infrastructure in place for management of waste water	Monitor only – information to be obtained from Thames Water	Strategic Aim (capacity supply and self-sufficiency) SO5 (sustainability)	To ensure that Thames Water have sufficient capacity to management the levels of waste water generated in North London over the plan period

8 Monitoring and Implementation continued

Implementing the Plan

8.7 Development and adoption of the Plan must be followed by actions by a range of agencies and other organisations to ensure that its Aims and Objectives are met. The section summarises proposals for how these outcomes will be delivered and who will be responsible for them.

8.8 Implementation has four components – infrastructure delivery; application of the policies to planning proposals for waste facilities; ongoing regulation and monitoring of the local waste management sector; and achieving performance levels – each of which involves different actors. *Table 15* summarises the organisations involved in each component.

Table 15: **Roles and Responsibilities Involved in Implementing the Plan**

Organisation	Role	Responsibilities
Local planning authorities (including London Legacy Development Corporation)	Apply Plan policies	Assessing suitability of applications against Plan policies and priorities Deliver the strategic objectives and policies of the NLWP alongside wider development and regeneration objectives
	Regulate/monitor	Inspect operating waste sites periodically Appoint a lead borough to monitor the plan and carry out the duty to co-operate when required Publish annual monitoring reports in the NLWP
	Performance delivery	Support/promote waste reduction initiatives through the planning system
Borough waste collection authorities	Infrastructure delivery	Bring forward new/replacement waste sites for recycling/composting LACW
	Performance delivery	Implement waste collection activities to deliver desired performance levels as appropriate Support/promote waste reduction initiatives
North London Waste Authority (NLWA)	Infrastructure delivery	Delivery of replacement Edmonton ERF plant
	Infrastructure delivery	Delivery of other facilities enabling achievement of desired performance levels
	Performance delivery	Prioritising infrastructure delivery that moves waste up the Waste Hierarchy Support/promote/deliver waste reduction initiatives
Landowners	Infrastructure delivery	Propose new waste sites in line with NLWP policies that deliver capacity requirements
Waste industry	Infrastructure delivery	Propose new waste sites and deliver new waste facilities in line with NLWP policies that deliver capacity requirements

8 Monitoring and Implementation continued

Table 15: **Roles and Responsibilities Involved in Implementing the Plan** continued

Organisation	Role	Responsibilities
Environment Agency	Regulate/monitor	Advise on planning applications according to the nature of the proposal Assess applications for Environmental Permits, issue licences where the proposal meets the necessary standards Inspect operating waste sites periodically Collect and publish information about waste movements for use in Plan monitoring Monitor water quality
	Performance delivery	Promote waste reduction initiatives
Health & Safety Executive	Regulate	Advise on planning applications according to the nature of the proposal Monitor
Other statutory bodies (eg. Natural England)	Regulate/monitor	Advise on planning applications according to the nature of the proposal Monitor protected sites such as SSSI
Greater London Authority	Performance delivery	Promote waste reduction initiatives Promote carbon reduction initiatives
	Apply Plan policies	Assessing suitability of applications against London Plan policies and priorities Regional coordination of waste planning
London Waste and Recycling Board	Infrastructure delivery	Support to new waste infrastructure
	Performance delivery	Support to waste collection authorities to deliver desired performance levels Support/promote waste reduction initiatives

8.9 New commercial infrastructure required during the plan period will be funded by private funding through sources that cannot be identified at this time. In addition, there may be other sources of funding available such as public sector borrowing. Facilities required for the management of LACW will be funded by NLWA. The waste industry has been invited to take part in the development of the Plan through involvement in the various consultation processes and calls for them to propose suitable sites for waste management use. The NLWP identifies infrastructure priorities for the next 15 years and this will help to provide the industry with greater certainty about waste management priorities in the North London Boroughs that can inform future investment decisions.

8.10 *Table 16* sets out how policies in the NLWP will be implemented. Who will be involved in each action and which of the Strategic Objectives are addressed as a result.

8 Monitoring and Implementation continued

Table 16: **How the NLWP Policies will be Implemented**

Mechanism	Stakeholders Involved	Objectives Implemented
Policy 1: Existing Waste Management Sites		
Planning permission for the expansion or intensification of operations at existing waste facilities Refusal of planning permission for non-waste use on existing waste sites unless capacity is re-provided Identifying compensatory provision when it is proposed to redevelop existing waste management facilities for non-waste uses	Local planning authorities/ Landowner/ developers/NLWA	SO2, SO3
Policy 2 Priority Areas for New Waste Management Facilities		
Planning permission and subsequent development	Landowners and developers/waste management companies/NLWA/local planning authorities/Environment Agency and other statutory bodies	SO1, SO2, SO3, SO5
Policy 3: Windfall Sites		
Planning permission and subsequent development	Landowners and developers/waste management companies/NLWA/local planning authorities/Environment Agency and other statutory bodies	SO2, SO3
Policy 4: Re-use & Recycling Centres		
Planning permission and subsequent development	Landowners and developers/waste management companies/NLWA/local planning authorities/Environment Agency and other statutory bodies	SO1, SO2, SO3
Policy 5: Assessment Criteria for Waste Management Facilities and Related Development		
Planning permission and subsequent development	Local planning authorities/Environment Agency and other statutory bodies	SO4, SO5, S07, SO8
Policy 6: Energy Recovery and Decentralised Energy		
Planning permission and subsequent development	Landowners and developers/waste management companies/local planning authorities/NLWA/Environment Agency and other statutory bodies	SO1, SO6
Policy 7: Waste Water Treatment Works and Sewage Plant		
Planning permission and subsequent development	Thames Water/Environment Agency and other statutory bodies/local planning authorities	SO2, SO4, SO5, SO8
Policy 8: Inert Waste		
Planning permission and subsequent development	Landowners and developers/waste management companies/local planning authorities// Environment Agency and other statutory bodies	SO1, SO2, SO3, SO5, SO8

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20 ♦ These sites will be redeveloped under the planning permission for the regeneration of Brent Cross Cricklewood (Barnet planning application reference F/04687/13). The Hendon Rail Transfer Station (BAR4) will be replaced with a new facility to meet the NLWA's requirements. Planning permission for the new sites at Geron Way was granted by Barnet Council Planning Committee in September 2018. The existing commercial facilities at BAR6 and BAR7 fall within the land required to deliver the early Southern phase of the BXC regeneration which is expected to commence in the near term; replacement capacity for these sites will be sought in accordance with the planning permission for Brent Cross Cricklewood. The BAR3 site is identified for redevelopment in Phase 4 of the BXC regeneration and is currently not anticipated to be redeveloped until after 2026. It is planned that capacity at the waste facilities of BAR4, BAR6 and BAR7 and part of the capacity of BAR3 will be replaced by the new Waste Transfer Station (WTS) delivered as part of the Brent Cross Cricklewood Regeneration. The balance of the replacement capacity for BAR3 will need to be identified prior to its redevelopment and the London Borough of Barnet will seek to provide replacement capacity within the borough with the Local Plan identifying potential sites.

Schedule 1: Existing Safeguarded Waste Sites in North London

Site ID	Site Name	Site Address	Waste Stream	Managed Waste	2012	2013	2014	2015	2016
BAR1	Winters Haulage, Oakleigh Road South	British Rail Sidings, Oakleigh Road South, Southgate, London, N11 1HJ	C&I/CDE	X	10,495	38,503	40,409	35,379	0
BAR2	Scratchwood Quarry	London Gateway Service Area, M1 Motorway, Mill Hill, London, NW7 3HU	CDE	✓	52,835	71,046	99,060	102,527	131,505
BAR3♦[20]	P B Donoghue, Claremont Road	3 Shannon Close, Claremont Road, Cricklewood, London, NW2 1RR	CDE	✓ (96%)	0	118,964	112,449	112,487	111,226
BAR4♦	W R G, Hendon Rail Transfer Station	Hendon Rail Transfer Station, Brent Terrace, Hendon, London, NW2 1LN	LACW	X	153,952	164,129	114,457	128,605	142,107
BAR5	Summers Lane Reuse and Recycling Centre	Civic Amenity & Waste Recycling Centre, Summers Lane, London, N12 0RF	LACW	X	15,612	16,361	17,206	10,584	18,237
BAR6♦	Mc Govern Brothers, Brent Terrace, Hendon	26-27 Brent Terrace, Claremont Industrial Estate, Hendon, London, NW2 1BG	C&I/CDE	X	78,488	76,609	78,855	106,206	102,373
BAR7♦	Cripps Skips Brent Terrace	Nightingale Works, Brent Terrace, Claremont Way Industrial Estate, London, NW2 1LR	C&I/CDE	X	9,726	7,719	8,807	9,408	8,910
BAR8	Apex Car Breakers, Mill Hill	Ellesmere Avenue, Mill Hill, London, NW7 3HB	C&I	✓	182	162	227	256	243
BAR9	Vacant (previously Savacase Ltd	Railway Arches, Colindeep Lane, Hendon, London, NW9 6HD	C&I	N/A	0	0	0	0	0
BAR10	G B N Services Ltd, New Southgate	Land/Premises at Oakleigh Road South, Friern Barnet, London, N11 1HJ	CDE	✓ (72%)	14,596	29,938	29,456	31,274	10,746
BAR11	Upside Railway Yard	Upside Railway Yard, Brent Terrace, Cricklewood, London, NW2 1LN	CDE	X	0	0	0	0	234,930
CAM1	Regis Road Reuse and Recycling Centre	Regis Road, Kentish Town, London, NW5 3EW	LACW	X	–	2,535	5,409	5,595	5,119

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Schedule 1: **Existing Safeguarded Waste Sites in North London** continued

Site ID	Site Name	Site Address	Waste Stream	Managed Waste	2012	2013	2014	2015	2016
ENF1	Crews Hill Transfer Station	Kingswood Nursery, Theobalds Park Road, Crews Hill, Enfield, Middlesex, EN2 9BH	C&I	X	17,466	17,124	19,231	19,507	18,427
ENF2	Barrowell Green Recycling Centre	Barrowell Green, Winchmore Hill, London, N21 3AU	LACW	X	10,715	14,556	13,837	11,541	16,923
ENF3	Pressbay Motors Ltd, Motor Salvage Complex	Motor Salvage Complex, Mollison Avenue, Brimsdown, Enfield, Middlesex, EN3 7NJ	C&I	✓	63	63	26	29	37
ENF5	Jute Lane, Brimsdown	Greenwood House, Jute Lane, Brimsdown, Enfield, Middlesex, EN3 7PJ	LACW	✓ (76%)	16,115	11,732	12,659	10,125	15,410
ENF6	AMI Waste (Tuglord Enterprises)	17 Stacey Avenue, Edmonton, London, N18 3PP	C&I/CDE	X	16,855	27,043	28,566	23,004	21,974
ENF7	Vacant (previously Budds Skips)	The Market Compound, 2 Harbet Road, Edmonton, London, N18 2HQ	C&I/CDE	–	834	802	1,778	0	0
ENF8	Biffa Edmonton (AKA Greenstar Environmental)	Atlas at Aztec 406, 12 Ardra Road, Off Meridan Way, Enfield, London, N9 0BD	LACW/ C&I	✓ (84%)	231,771	72,530	271,888	276,855	270,106
ENF9	Hunt Skips, Commercial Road, Edmonton	Rear of 160 Bridport Road, Commercial Road, Edmonton, London, N18 1SY	C&I/CDE	✓	9,935	–	20,359	–	8,719
ENF10	Rooke & Co Ltd, Edmonton	Montague Road Industrial Estate, 22-26 First Avenue, Edmonton, London, N18 3PH	C&I	✓	32,249	24,867	28,095	25,235	3,897
ENF11	Edmonton Bio Diesel Plant (Pure Fuels)	Unit A8 Hastingwood Trading Estate, Harbet Road, London, N18 3HT	C&I	✓	512	738	895	1,251	–
ENF12	Camden Plant	Camden Plant, Lower Hall Lane, Chingford	CDE	✓	236,950	232,590	241,900	216,334	206,806
ENF13	Personnel Hygiene Services Ltd, Princes Road, Upper Edmonton	10 Princes Road, Edmonton, London, N18 3PR	C&I	X	0	0	95	1,004	1,081
ENF14	Vacant (Formerly Lea Valley motors Ltd)	Second Avenue, Edmonton	C&I	N/A	0	0	0	0	0

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Schedule 1: **Existing Safeguarded Waste Sites in North London** continued

Site ID	Site Name	Site Address	Waste Stream	Managed Waste	2012	2013	2014	2015	2016
ENF15	A & A Skip Hire Limited	Yard 10-12 Hastingwood Trading Estate, Harbet Road, Edmonton, London, N18 3HR	C&I	✓ (89%)	0	0	9,391	16,277	10,696
ENF17	Albert Works	Albert Works, Kenninghall Road, Edmonton, London, N18 2PD	C&I	✓	193,308	224,020	233,225	211,424	–
ENF18	Edmonton Energy from Waste Facility	Edmonton Ecopark, Advent Way, Edmonton, London, N18 3AG	LACW	✓	546,402	526,829	560,685	550,408	597,134
	LondonEnergy Ltd Composting	Edmonton Ecopark, Advent Way, Edmonton, London, N18 3AG	LACW	✓	32,498	32,779	35,241	32,475	33,981
	LondonEnergy Bulk Waste Recycling Facility	Edmonton Ecopark, Advent Way, Edmonton, London, N18 3AG	LACW	X	192,907	190,333	168,121	157,227	198,389
	Ballast Phoenix Ltd	Edmonton Ecopark, Advent Way, Edmonton, London, N18 3AG	LACW	✓	58,255	106,341	112,419	109,114	101,189
ENF23	J O' Doherty Haulage, Nobel Road, Edmonton	Pegamoid Site, Nobel Road, Edmonton, London, N18 3BH	C&I	✓	85,103	69,124	64,897	77,305	88,636
ENF24	Oakwood Plant Ltd, Edmonton	Oakwood House, Nobel Road, Eley Industrial Estate, Edmonton, London, N18 3BH	C&I/CDE	✓	10,282	7,495	10,011	13,489	14,428
ENF25	Environcom Ltd (Edmonton Facility)	Unit 8a Towpath Road, Stonehill Business Park, London, N18 3QU	Hazard-ous (WEEE)	✓	2,447	1,327	9,194	11,400	67
ENF26	Powerday Plant Ltd, Jeffreys Road	Unit 2, Jeffrey's Road, Brimsdown, Enfield, Middlesex, EN3 7UA	C&I/CDE	✓	27,319	18,664	43,851	23,490	49,754
ENF30	Hunsdon Skip Hire (Previously L&M Skips and London & Metropolitan Recycling)	Unit 1, 1b Towpath Road, Stonehill Business Park, London, N18 3QX	C&I/CDE	✓	0	7,150	26,545	15,501	11,337
ENF31	Volker Highways Ltd	15 Edison Road, Brimsdown Industrial Estate, Enfield, EN3 7BY	C&I/CDE	✓	–	8,892	13,652	7,344	–

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Schedule 1: **Existing Safeguarded Waste Sites in North London** continued

Site ID	Site Name	Site Address	Waste Stream	Managed Waste	2012	2013	2014	2015	2016
ENF35	Redcorn (ELV)	22a & 24, Stacey Avenue, Montagu Industrial Estate, Enfield, N18 3PS	Hazard-ous (C&I)	✓	–	–	–	–	6,557
ENF37	GBN	Gibbs Road, Montagu Industrial Estate, London, N18 3PU	CDE	✓	–	–	–	–	–
HAC1	Millfields Waste Transfer & Recycling Facility	Millfields Recycling Facility, Millfields Road, Hackney, London, E5 0AR	LACW	X	18,202	13,935	14,173	16,785	16,725
HAC2	Downs Road Service Station	1A Downs Road, Clapton, London, E5 8QJ	C&I	✓	177	175	96	101	–
HAR3	Biffa Waste Services Ltd, Garman Road, Tottenham	81, Garman Road, Tottenham, London, N17 0UN	C&I	✓	28,851	30,355	34,690	33,704	37,454
HAR4	O'Donovan, Markfield Road,	100a Markfield Road, Tottenham, London, N15 4QF	C&I/CDE	✓ (50%)	6,316	10,099	11,143	7,035	14,693
HAR5	Redcorn Ltd, White Hart Lane, Tottenham	44 White Hart Lane, Tottenham, London, N17 8DP	C&I	✓	15,712	22,733	23,852	8,508	–
HAR6	Restore Community Projects	Unit 18, Ashley Road, Tottenham Hale, London, N17 9LJ	C&I	✓	24	103	185	278	98
HAR7	Redcorn Ltd	Brantwood Road, Tottenham, London, N17 0ED	C&I	✓	2,470	5,225	2,250	23,779	39,283
HAR8	O'Donovan, Tottenham	82 Markfield Road, Tottenham, London, N15 4QF	CDE	✓	5,079	27,330	31,460	25,674	123,308
HAR9	Park View Road Reuse and Recycling Centre	Civic Amenity Site, Park View Road, Tottenham, London, N17 9AY	LACW	X	3,706	2,409	6,326	5,499	5,745
HAR10	Western Road Re-use & Recycling Centre	Western Road, Haringey, N22 6UG	LACW	X	0	0	2,526	4,851	3,799
HAR11	Durnford Street Car Dismantlers & Breakers	6-40, Durnford Street, Tottenham, London, N15 5NQ	C&I	✓	0	0	0	432	288
ISL1	Hornsey Household Re-use & Recycling Centre and Transfer Station	Hornsey Street, Islington, London, N7 8HU	LACW	X	196,818	195,018	203,919	204,496	212,232
WAF1	Mercedes Parts Centre	21 Chingford Industrial Estate, Hall Lane, Chingford, London, E4 8DJ	C&I	✓	0	0	0	0	7

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Schedule 1: **Existing Safeguarded Waste Sites in North London** continued

Site ID	Site Name	Site Address	Waste Stream	Managed Waste	2012	2013	2014	2015	2016
WAF2	Kings Road Household Waste Recycling Centre	Civic Amenity Site, 48 Kings Road, Chingford, London, E4 7HR	LACW	X	1,213	881	2,178	2,400	2,853
WAF3	South Access Road Household Waste Recycling Centre	42a South Access Road, Walthamstow, London, E17 8BA	LACW	X	2,917	2,784	6,790	6,949	7,203
WAF5	Vacant (previously T J Autos (UK) Ltd)	17 Rigg Approach, Leyton, London, E10 7QN	C&I	✓	53	53	81	21	11
WAF8	Leyton Reuse & Recycling Centre	Gateway Road, Leyton, London, E10 5BY	LACW	X	2,164	2,255	2,564	3,003	2,589
WAF9	Vacant (previously B D & G Parts For Rover)	Roxwell Trading Park, Leyton	C&I	–	0	0	0	0	0
WAF10	Malbay Waste Disposal Ltd, Staffa Road, Leyton	5 Staffa Road, Leyton, London, E10 7PY	C&I/CDE	X	6,700	10,682	12,624	7,339	9,925
WAF12	Argall Metal Recycling	Unit 1, Staffa Road, E10 7PY	C&I	✓	0	21,537	31,603	30,378	0
WAF14	Tipmasters	15 Rigg Approach, London, Greater London, E10 7QN	C&I	X	0	0	586	2,847	3,622
WAF16	Whipps Cross Hospital Clinical Waste Treatment Facility	Whipps Cross Hospital, Whipps Cross Road, London, E11 1NR	C&I (clinical)	X	0	0	0	0	5

nlwp
north london waste plan

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North London Waste Plan

Appendix 2: Area Profiles

November 2021

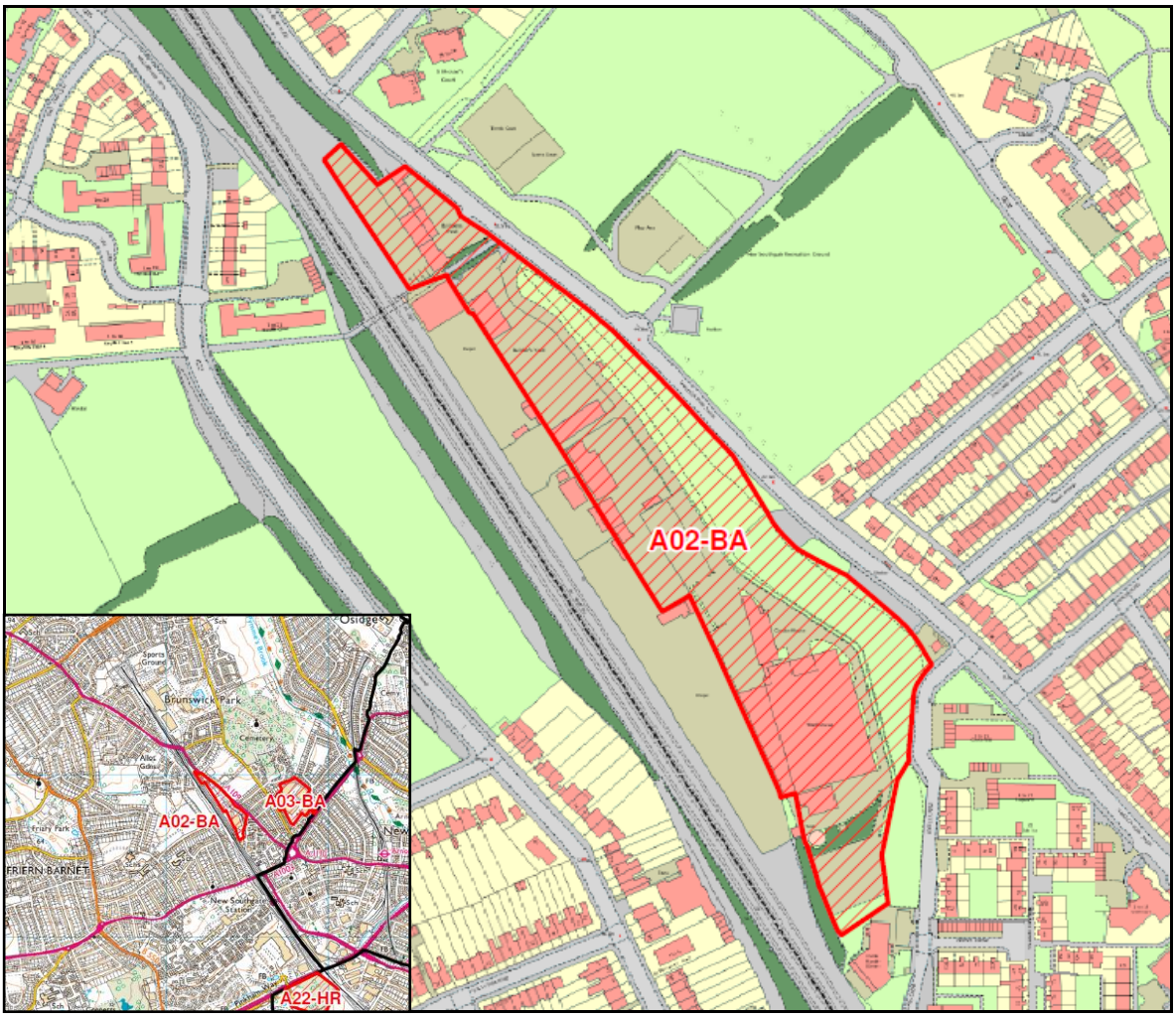
Schedule 2: Priority Areas for waste management

Area ref	Area Name	Borough
A02-BA	Oakleigh Road	Barnet
A03-BA	Brunswick Industrial Park	Barnet
A04-BA	Mill Hill Industrial Estate	Barnet
A05-BA	Connaught Business Centre	Barnet
A12-EN	Eley's Estate	Enfield
A15-HC	Millfields LSIS	Hackney
A19-HR	Brantwood Road	Haringey
A21-HR	North East Tottenham	Haringey
A22-HR	Friern Barnet Sewage Works/ Pinkham Way	Haringey
A24-WF	Argall Avenue	Waltham Forest

Schedule 3: Priority Areas identified in LLDC Local Plan

Area ref	Area Name	Borough
LLDC1-HC	Bartip Street	Hackney
LLDC2-HC	Chapman Road (Palace Close)	Hackney
LLDC3-WF	Temple Mill Lane	Waltham Forest

A02-BA - Oakleigh Road, Barnet
1:3,550 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)



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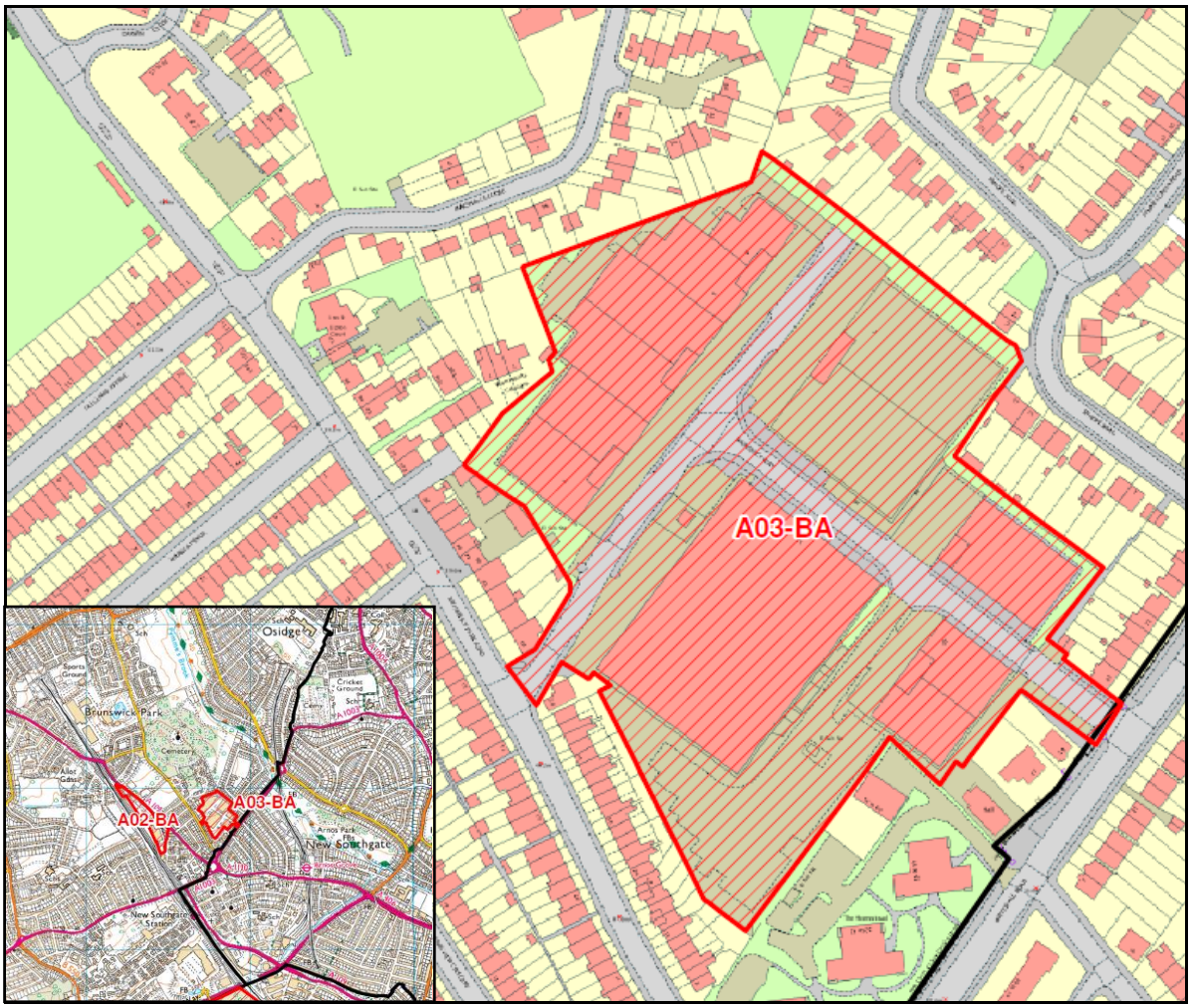
Area Details	
Borough	Barnet
Type of Location	Area
Location Reference	A02-BA - Oakleigh Road
Size	3.10 ha
Area Description	Industrial area, includes a builder's depot, a LB Barnet Council depot which contains a waste management element, and two existing waste management facilities.
Description of surrounding uses	Residential properties adjacent to south and north and green space to east and west. Main line railway to the west.

Planning Information	
Planning Designation	Area is designated as a Locally Significant Industrial Site (LSIS). Potential to be safeguarded as a site for Crossrail 2.
Relevant Local Plan Policy	Local Plan Development Management Policy DM14: New and existing employment space
Land Use	
Co-location	Area is suitable for co-location.
Major New Developments	Oakleigh Road is an area of surface interest for Crossrail 2.
Decentralised Energy Network	In proximity to area suitable for Decentralised Energy Network.
Details of in-situ infrastructure	None identified
Constraints	
Flood Risk	Area is within Flood Zone 1 (lowest probability of flooding). Area at risk of surface water flooding.
Surface and Groundwater	Area is not within a Source Protection Zone.
Land Instability	No known issues
Sensitive Receptors (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Residential properties lie approximately 10m south, 20m east and 35m northwest of the area.
Nature Conservation	No issues identified.
Green Belt and Open Space	Metropolitan open space lies approximately 10m east and 45m west of the area.
Historic Environment	Within Watling Street Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.
Highways	Access is suitable for HGV traffic and the area is currently used by commercial vehicles. Given the close proximity of residential properties 24 hour access is unlikely to be suitable.
Conclusion	
Potential Uses	Integrated resource recovery facilities/resource parks, Waste transfer, processing and recycling. The area is not within Source Protection Zone 1 or Flood Zone 3 and is therefore potentially suitable to handle hazardous waste.
Uses unlikely to be suitable	Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.

Potential mitigation measures	There are a number of environmental and amenity issues facing the area such as the proximity of residential properties and Metropolitan Open Land, as such the area is not suitable for external facilities. Facilities should therefore be enclosed. Key mitigation measures should include dust suppression and other measures such as wheel-washing, negative air pressure and rapid-closure doors. Proposals should also protect the existing green infrastructure or provide appropriate replacement landscaping and/or planting and incorporate appropriate boundary treatments. As proposals may increase the level of traffic generated within the area a traffic impact assessment should be undertaken.

A03-BA - Brunswick Industrial Park, Barnet
1:2,450 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)



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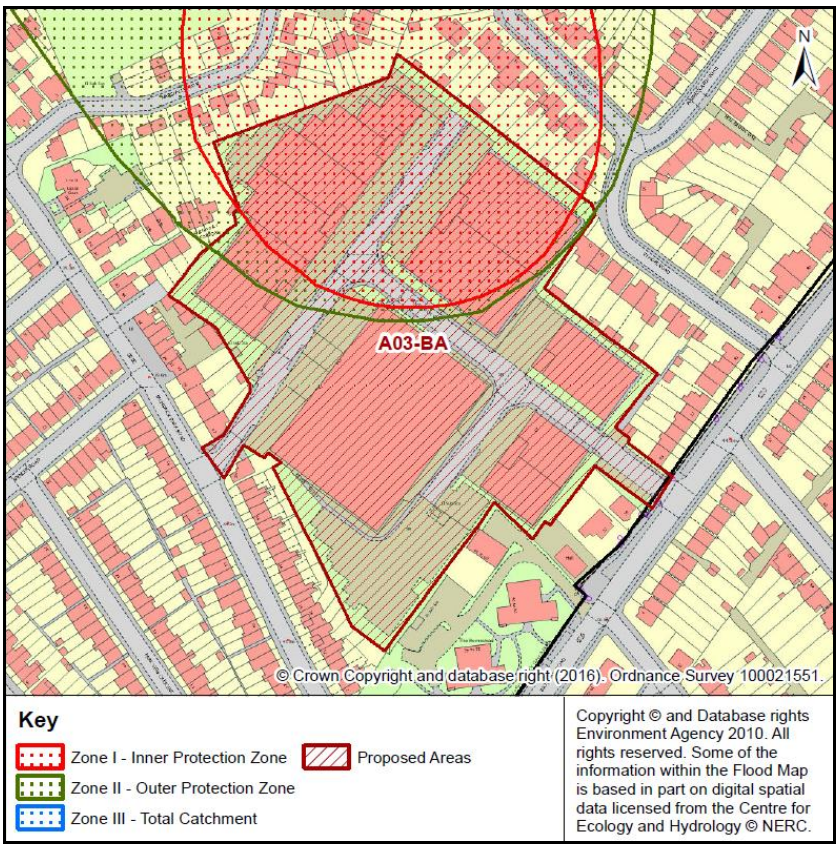
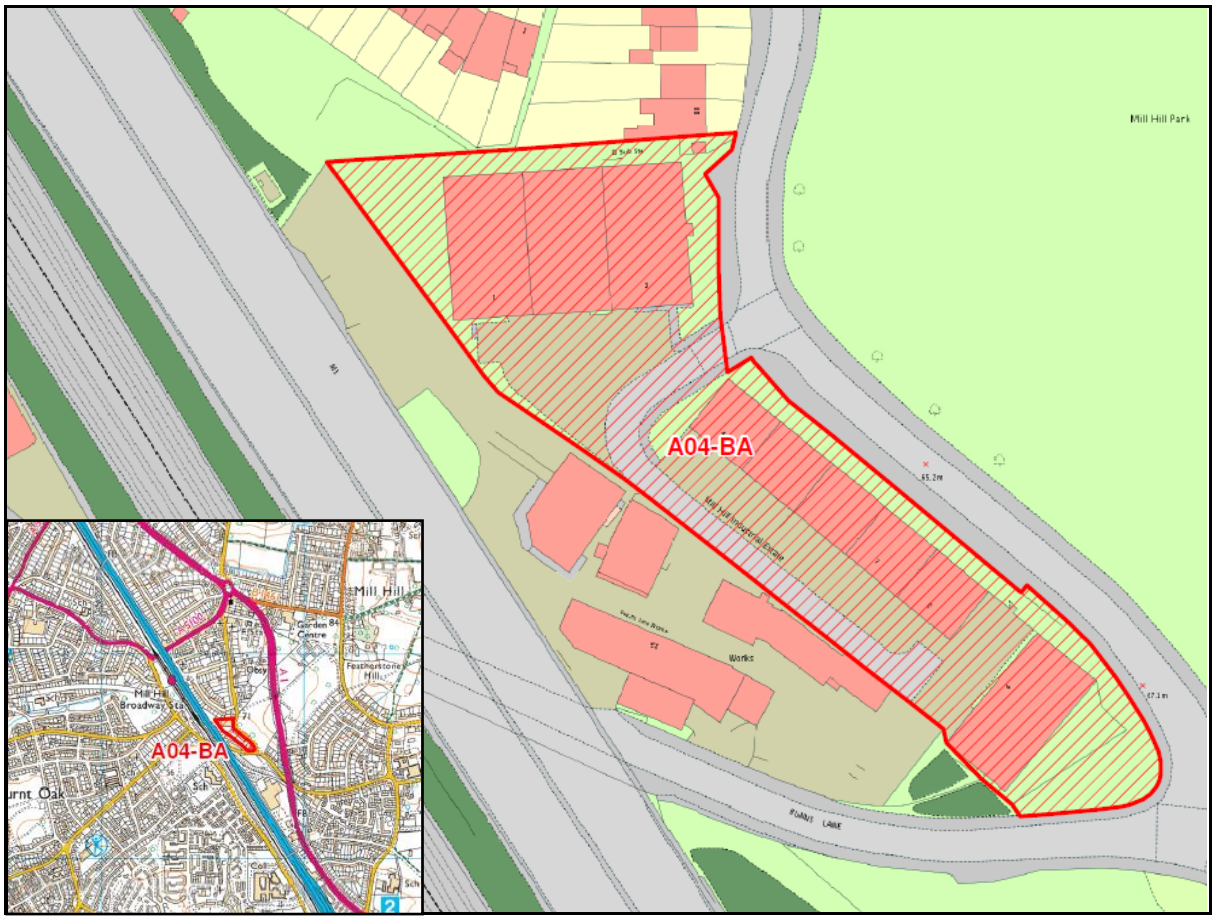
Area Details	
Borough	Barnet
Type of Location	Area
Location Reference	A03-BA - Brunswick Industrial Park
Size	3.95 ha
Area Description	The area is a Business Park which includes a builder's yard and other trade outlets.
Description of surrounding uses	The area is bound on all sides by residential properties. Areas of green open space lie to the north of the area. However these are separated from the Business Park by residential properties.

Planning Information	
Planning Designation	Area is designated as a Locally Significant Industrial Site (LSIS). Area is proposed for Article 4 designation to remove PD rights for conversion to residential. Expect to be confirmed Sept 2019.
Relevant Local Plan Policy	Local Plan Development Management Policy DM14: New and existing employment space
Land Use	
Co-location	Not practicable in this location
Major New Developments	None in immediate area
Decentralised Energy Network	In close proximity to area designated as having potential for Decentralised Energy network.
Details of in-situ infrastructure	None identified
Constraints	
Flood Risk	Flood Zone 1 (lowest probability of flooding). Parts of the Business Park at risk of flooding from surface water.
Surface and Groundwater	The north of the area falls within Source Protection Zones 1 and 2. Facilities within Source Protection Zone 1 should only deal with inert waste unless otherwise agreed with the Environment Agency. 

Land Instability	No known issues
Sensitive Receptors (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Residential properties bound the Business Park on all sides.
Nature Conservation	A Borough Site of Importance for Nature Conservation lies approximately 25m north of the area.
Green Belt and Open Space	Metropolitan Open Space approximately 25m north of the area
Historic Environment	No assets identified in vicinity.
Highways	Access is suitable for HGV traffic and the area is currently used by commercial vehicles. Given the close proximity of residential properties 24 hour access is unlikely to be suitable.
Conclusion	
Potential Uses	Waste Transfer, Processing and Recycling. The areas of the Business Park which do not lie within source protection zone 1 are potentially suitable to handle hazardous waste.
Uses unlikely to be suitable	Integrated resource recovery facilities/resource parks, thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting
General mitigation measures	There are a number of environmental and amenity issues facing the area such as the proximity of residential properties and Metropolitan Open Space which is designated a borough SINC. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are therefore likely to be important mitigation measures. Consideration should be given to any potential impacts on air quality and measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site and providing wheel washing facilities could help mitigate any potential impacts. In addition, as the area lies within Source Protection Zone 1, the completion of an assessment of risk posed to groundwater should be undertaken and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures. Measures to protect ground water will need to be agreed with the Environment Agency. As proposals may increase the level of traffic generated within the area a traffic impact assessment will be a key mitigation measure.

A04-BA - Mill Hill Industrial Estate, Barnet	
1:1,350 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)	
	
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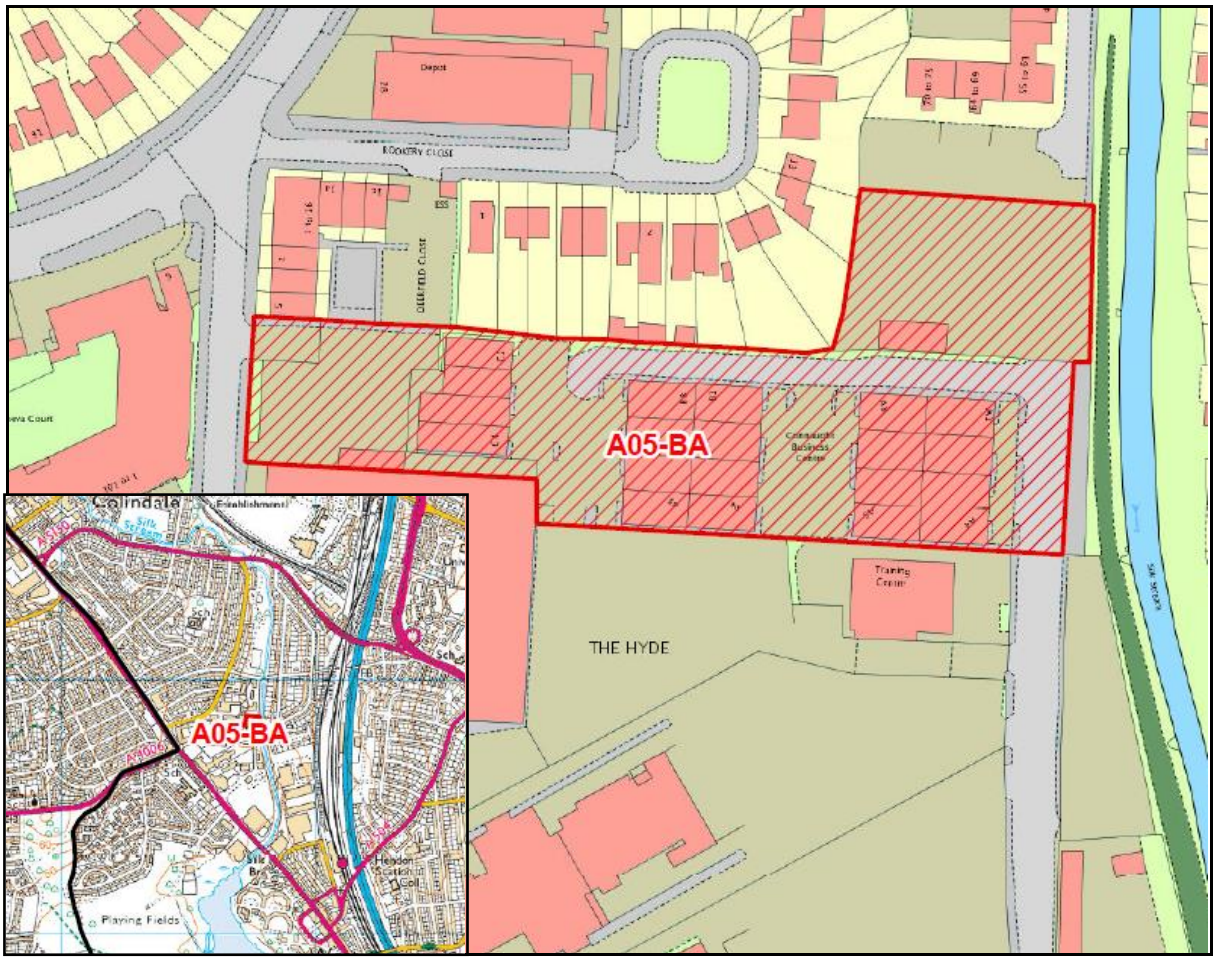
Area Details	
Borough	Barnet
Type of Location	Area
Location Reference	A04-BA - Mill Hill Industrial Estate
Size	0.90 ha
Area Description	Industrial Estate comprising numerous small warehouses.
Description of surrounding uses	Industrial/commercial area borders the south. The M1 motorway is also located to the south. Adjacent residential area to the north and Mill Hill Park to the east.
Planning Information	

Planning Designation	Area is designated as a Locally Significant Industrial Site (LSIS). Area is proposed for Article 4 designation to remove PD rights for conversion to residential. Expect to be confirmed Sept 2019.
Relevant Local Plan Policy	Local Plan Development Management Policy DM14: New and existing employment space
Land Use	
Co-location	Not practicable in this location
Major New Developments	None in immediate area
Decentralised Energy Network	No.
Details of in-situ infrastructure	None identified
Constraints	
Flood Risk	Area is within Flood Zone 1 (lowest probability of flooding). Site is at risk of flooding from surface water.
Groundwater	The area is not within a Source Protection Zone.
Land Instability	No stability issues identified.
Sensitive Receptors (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Residential properties lie adjacent to the north of the industrial estate.
Nature Conservation	No issues identified.
Green Belt and Open Space	Mill Hill Park Green Belt lies 15m east of area.
Historic Environment	No assets identified in vicinity.
Highways	Access is suitable for HGV traffic but there are restrictions on routes with low bridges that would need investigating.
Conclusion	
Potential uses	Waste transfer, processing and recycling. The area is potentially suitable to handle hazardous waste.
Uses unlikely to be suitable	Integrated resource recovery facilities/resource parks, thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.

Potential mitigation measures	There are a number of environmental and amenity issues facing the area such as the proximity of residential properties adjacent to the north and Mill Hill Park which is designated Green Belt land to the east, as such the area is not suitable for external facilities. Facilities should therefore be enclosed and incorporate dust suppression and other measures such as wheel-washing negative air pressure and rapid-closure doors. The ecological value of the area and its surrounding should be assessed. Any future development proposals should incorporate high quality boundary treatment, landscape screening or park improvements to protect the recreational potential of the park and surrounding residential amenity. As the area is at risk from surface water flooding the completion of a Flood Risk Assessment and inclusion of SuDs or other appropriate techniques to manage surface water runoff will be a key mitigation measures. As proposals may increase the level of traffic generated within the area and the suitability of local roads needs to be assessed and so a traffic impact assessment should be undertaken.

A05-BA - Connaught Business Centre, Barnet

1:1,500 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)



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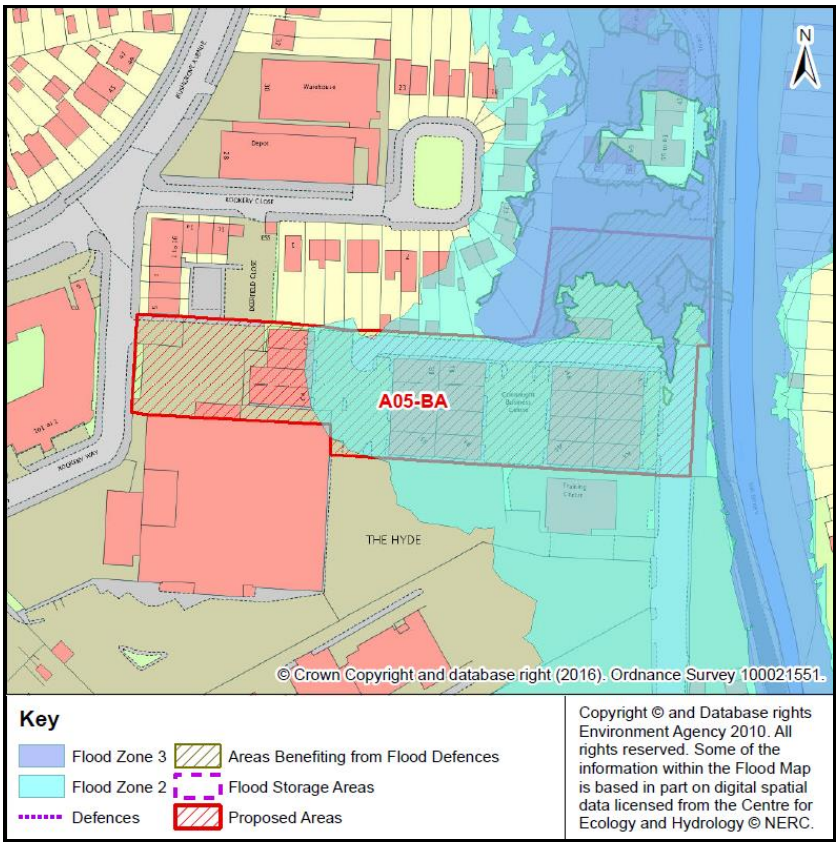
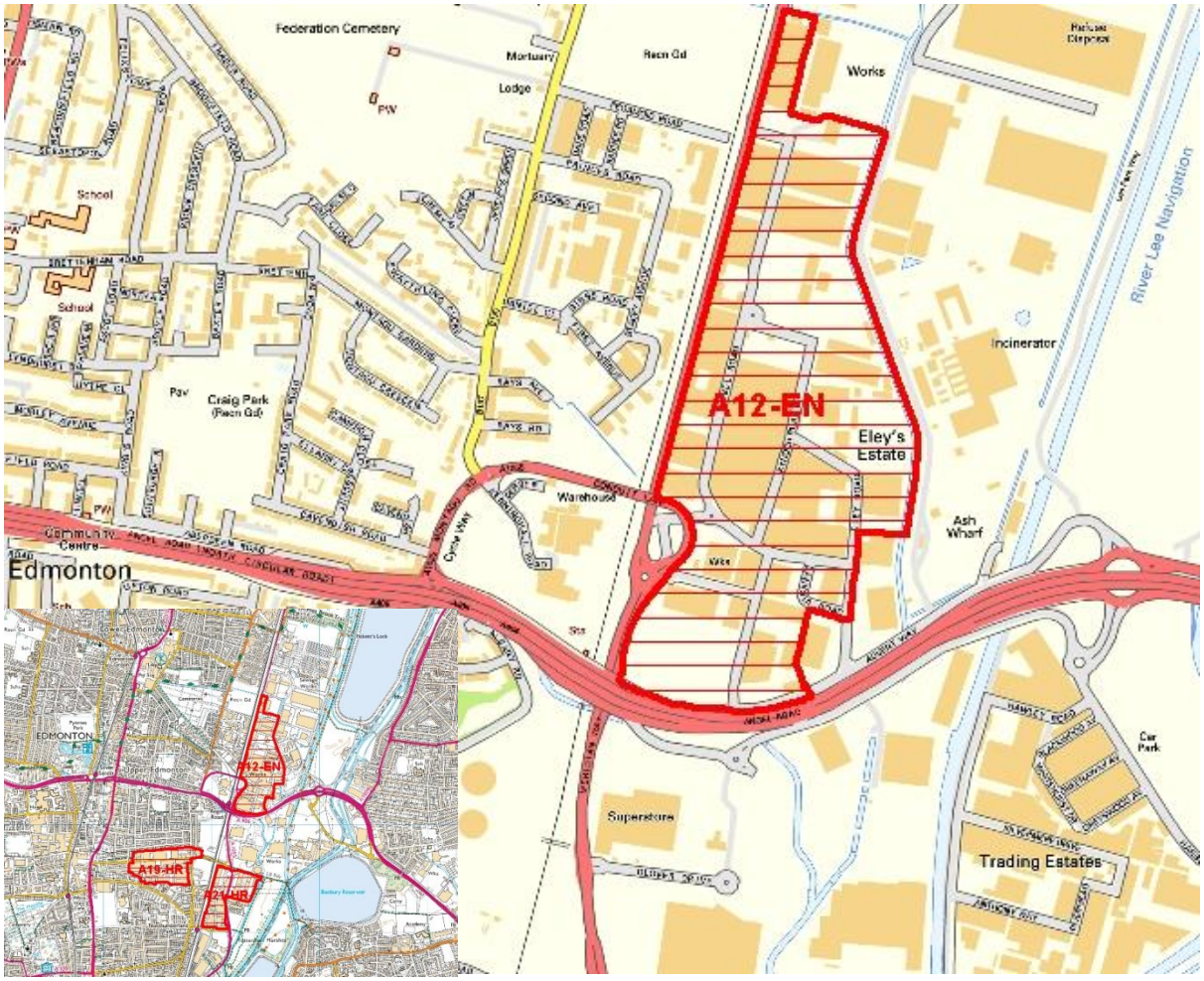
Area Details	
Borough	Barnet
Type of Location	Area
Location Reference	A05-BA - Connaught Business Centre
Size	0.90 ha
Area Description	A commercial business centre made up of small units.
Description of surrounding uses	A commercial area lies to the south as well as car parking. Residential properties border the north of the area. The former Telephone Exchange site to the west has been granted approval (18/0352/FUL) - subject to Mayoral call-in - for comprehensive redevelopment for up to 505 residential dwellings and flexible commercial floorspace.

Planning Information	
Planning Designation	Area is designated a Locally Significant Industrial Site (LSIS). Area is proposed for Article 4 designation to remove PD rights for conversion to residential. Expect to be confirmed Sept 2019.
Relevant Local Plan Policy	Local Plan Development Management Policy DM14: New and existing employment space
Land Use	
Co-location	Not practicable in this location
Major New Developments	None in immediate area
Decentralised Energy Network	No.
Details of in-situ infrastructure	None identified
Constraints	
Flood Risk	Area is within Flood Zone 2 & 3 (medium and highest probability of flooding) and a stream runs adjacent to the east of the area. Facilities within Flood Zone 3 should only deal with inert waste unless otherwise agreed with the Environment Agency. At high risk of surface water flooding.



Surface and Groundwater	The area is not within a Source Protection Zone. Silk Stream is adjacent to the east of site.
Land Instability	Historic landfill identified adjacent to the north east corner of area. This represents a potential stability issues in the north east of the area which will needed to be investigated if development is proposed in this area.
Sensitive Receptors	Residential properties adjacent to the north of the area.
Nature Conservation	Yes, a borough SINC lies adjacent to the east of area.
Green Belt and Open Space	None locally
Historic Environment	No assets identified in vicinity.
Highways	Access is suitable for HGV traffic but there may be local parking issues that reduce width for HGV access. Residential streets are located in the vicinity that may be affected by 24hr use. The suitability of specific proposals would need to be assessed.
Conclusion	
Potential Uses	Waste transfer, processing and recycling. Parts of the area which are not covered by Flood Zone 3 are potentially suitable to handle hazardous waste.
Uses unlikely to be suitable	Integrated resource recovery facilities/resource parks, thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.
General mitigation measures	There are a number of environmental and amenity issues facing the area such as the proximity of residential properties and borough SINC, as such the area is not suitable for external facilities. Facilities should therefore be enclosed and consideration should be given to siting any future proposals away from any sensitive receptors. Key mitigation measures should include dust suppression and other measures such as wheel-washing, negative air pressure and rapid-closure doors. Given the proximity of a borough SINC, undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are therefore likely to be important mitigation measures. As parts of the area are at a medium to high risk of flooding, the completion of a suitable Flood Risk Assessment, and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures. Appropriate measures should also be incorporated to prevent any contamination of the adjacent watercourses.

	A contamination and ground stability appraisal would be required to assess potential impacts from the historic landfill adjacent to the area boundary. As proposals may increase the level of traffic generated and suitability of local roads need to be assessed as such a traffic impact assessment will be a key mitigation measure.

12-EN – Eleys Estate, Enfield	
1:10,700 map of area showing outline over MasterMap base layer (inset map is of scale 1:24,000)	
	
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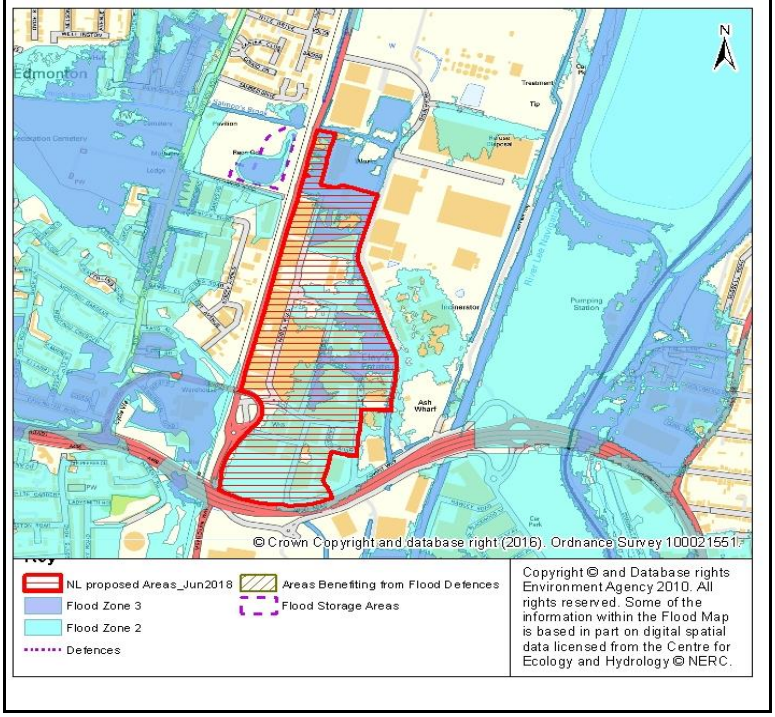
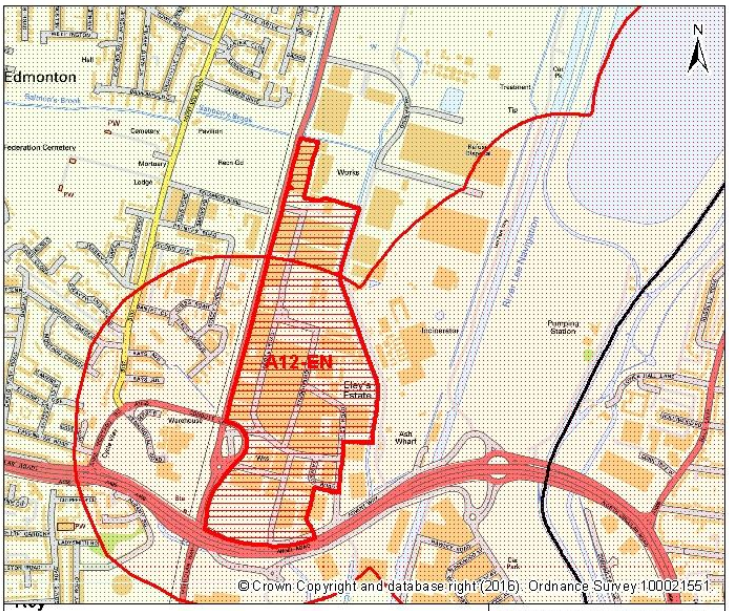
Area Details	
Borough	Enfield
Type of Location	Area
Location Reference	A12-EN – Eleys Estate
Size	26.1ha
Area Description	Industrial area of Eleys Estate which incorporates a number of existing waste sites and neighbours Edmonton Eco Park and Aztec A406 Industrial Estate.
Description of surrounding uses	Industrial/commercial and residential properties lie to the north. The east is bordered by Edmonton Ecopark which in turn borders the River Lee Navigation and the Lee Valley Regional Park, whilst the south is bordered by the North Circular Road.

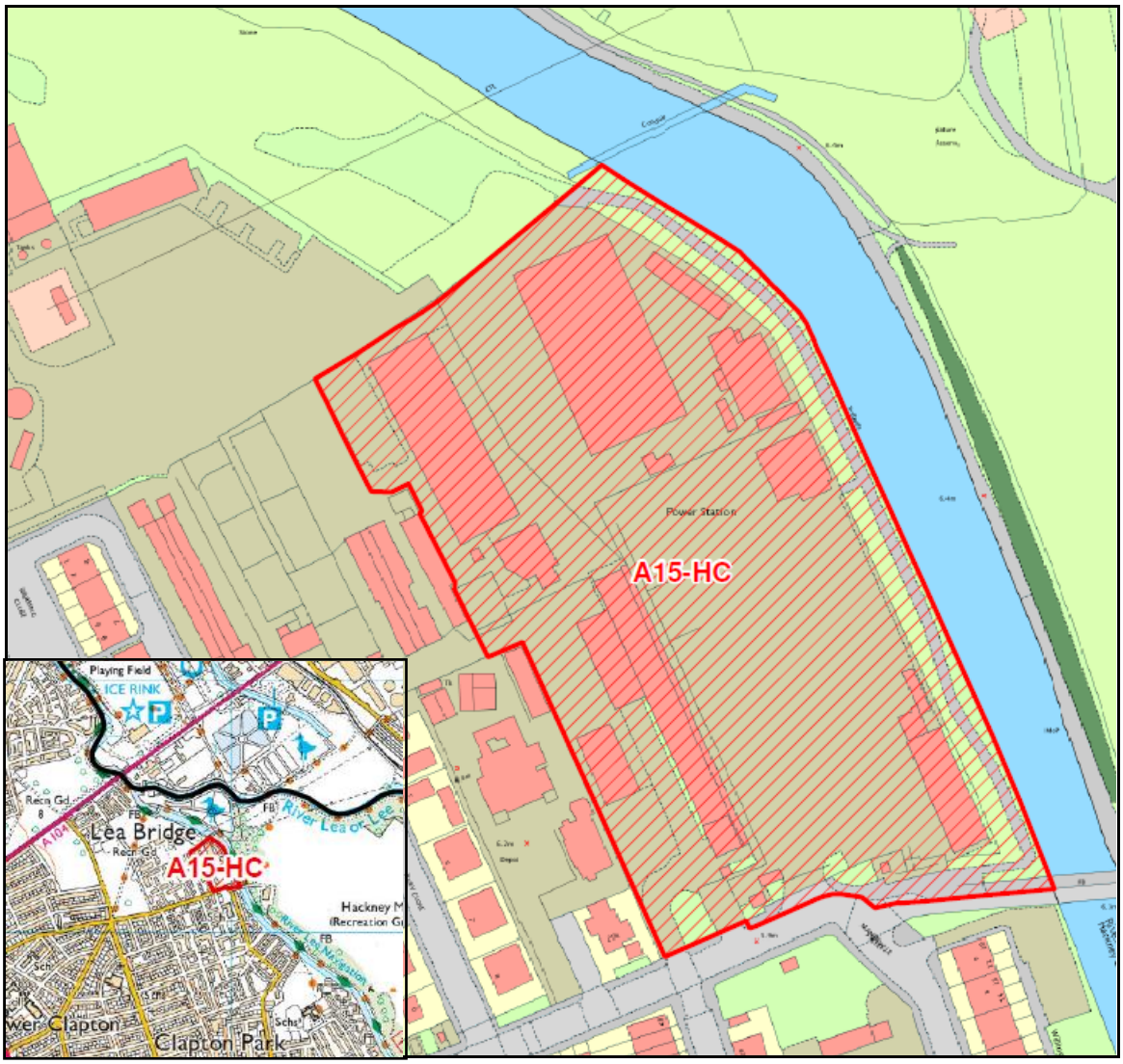
Planning Information	
Planning Designation	Area is designated as a Strategic Industrial Location (SIL) and lies within the Edmonton Leeside Area Action Plan Area (ELAAP).
Relevant Local Plan Policy	Edmonton Leeside Area Action Plan Area (ELAAP) (Yet to be adopted), Core Policies 14, 28 and 37, DMD Policies 19, 20, 21, 22 and 23.
Land Use	
Co-location	Yes, a number of facilities already exist in the area.
Major New Developments	Yes, within Edmonton Leeside Area Action Plan Area (ELAAP) (Yet to be adopted), and in close proximity to Meridian Water Development Area. The estate also lies within an Opportunity Area and a Housing Zone lies adjacent to the south as set out within the London Plan. The area is in close proximity to the new Meridian Water station, which is likely to also become a Crossrail 2 station.
Decentralised Energy Network	Area is within the Hinterland Opportunity Area and the Proposed Upper Lea Valley Decentralised Heating Transmission runs adjacent to Edmonton Ecopark on the eastern boundary of the site and within the south of the site.
Details of in-situ infrastructure	Overhead lines adjacent to east of the area: Brimsdown-Tottenham-Waltham Cross
Constraints	
Flood Risk	Within Eley's Estate the land in the south and west is largely within Flood Zone 2 (medium probability of flooding) and Flood Zone 3 (highest probability of flooding) with the south east of the estate within Flood Zone 2. The northeast corner is within Flood Zone 1 (lowest probability of flooding).

	
Surface and Groundwater	The southern half and the north east of Eley's Estate are within Source Protection Zone 1 with the remainder within Source Protection Zone 2. The Environment Agency has raised concerns over potential impacts on groundwater from development within this area. Facilities within Source Protection Zone 1 should only deal with inert waste unless otherwise agreed with the Environment Agency. Salmon's Brook runs around the boundary of the area and the River Lee Navigation lies to the east of the area adjacent to Edmonton Ecopark.

	
Land Instability	An historic minerals working and landfill is located outside the north east corner of site. A further historic minerals working and landfill can also be found adjacent to the west of site. There is potential for stability issues in the area covering and adjacent to the minerals working and landfills. However, the whole area is already developed which suggests any issue can be addressed. Further investigation will be required at the planning application stage.
Sensitive Receptors (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Residential properties lie 50m west of the north western corner of the estate. New residential properties will be built nearby through the Meridian Water development on the other side of the North Circular Road.
Nature Conservation	The Lee Valley Regional Park lies adjacent to the east of site with some overlap of the estates boundary. Within the Regional Park lies a Metropolitan Site of Importance for Nature Conservation (SINC).
Green Belt and Open Space	Green Belt land within the Lee Valley Regional Park lies adjacent to the east of the area.

Historic Environment	Historic England commented that development should avoid harm to the historic environment and the setting of Chingford Mill Pumping Station (grade II) should be considered~~. The potential archaeology value of area should be considered~~ along with the setting of Montagu Road Cemeteries Conservation Area. Within the Lea Valley West Bank Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.
Highways	Access is suitable for HGVs traffic, however there are known problems with parking within the area which impact the suitability of the highways to handle HGV traffic. The North Circular Road (adjacent to the south of site) is classed as an Air Quality "hot spot" as emissions regularly surpass the targets.
Conclusion	
Potential Uses	Integrated resource recovery facilities/resource parks, Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, Waste transfer, indoor composting, in-vessel composting, processing and recycling.
Uses unlikely to be suitable	Outdoor composting. Area is potentially unsuitable to handle hazardous waste.
Potential mitigation measures	There are a number of environmental and amenity issues facing the area such as the proximity of residential properties and the Lee Valley National Park which includes areas designated as SSSI and Metropolitan SINC, as such facilities in proximity to these features are not suitable for external facilities. Key mitigation measures should include dust suppression and other measures such as wheel-washing, negative air pressure and rapid-closure doors. Any future development proposals should include an assessment of ecological value on the proposed development area and wider area. The proposals should protect the existing green infrastructure or provide appropriate replacement landscaping and/or planting and incorporate appropriate boundary treatments. As the area is at a medium to high risk of flooding, the completion of a suitable Flood Risk Assessment, and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures. Appropriate measures should also be incorporated to prevent any contamination of groundwater or watercourses in or adjacent

	to the area. Proposals in the north east corner or along the west of the area will need a contamination and ground stability appraisal to assess potential impacts from the historic landfill and minerals working in these areas. As proposals may increase the level of traffic generated within the area an air quality impact assessment will be a key mitigation measure. Consideration should be given to parking arrangement as there are known issues within the area. Where necessary an appraisal to assess impact of new structures on the historic environment will be required. Building design should be sympathetic to the historic setting.

A15-HC – Millfields LSIS, Hackney	
1:1,750 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)	
	
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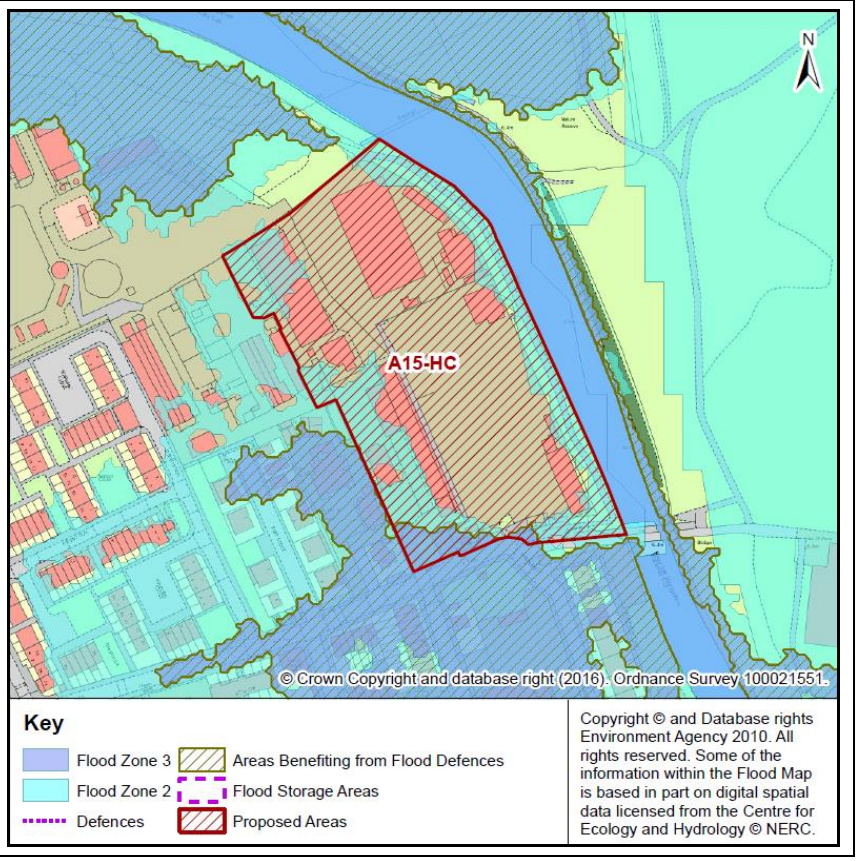
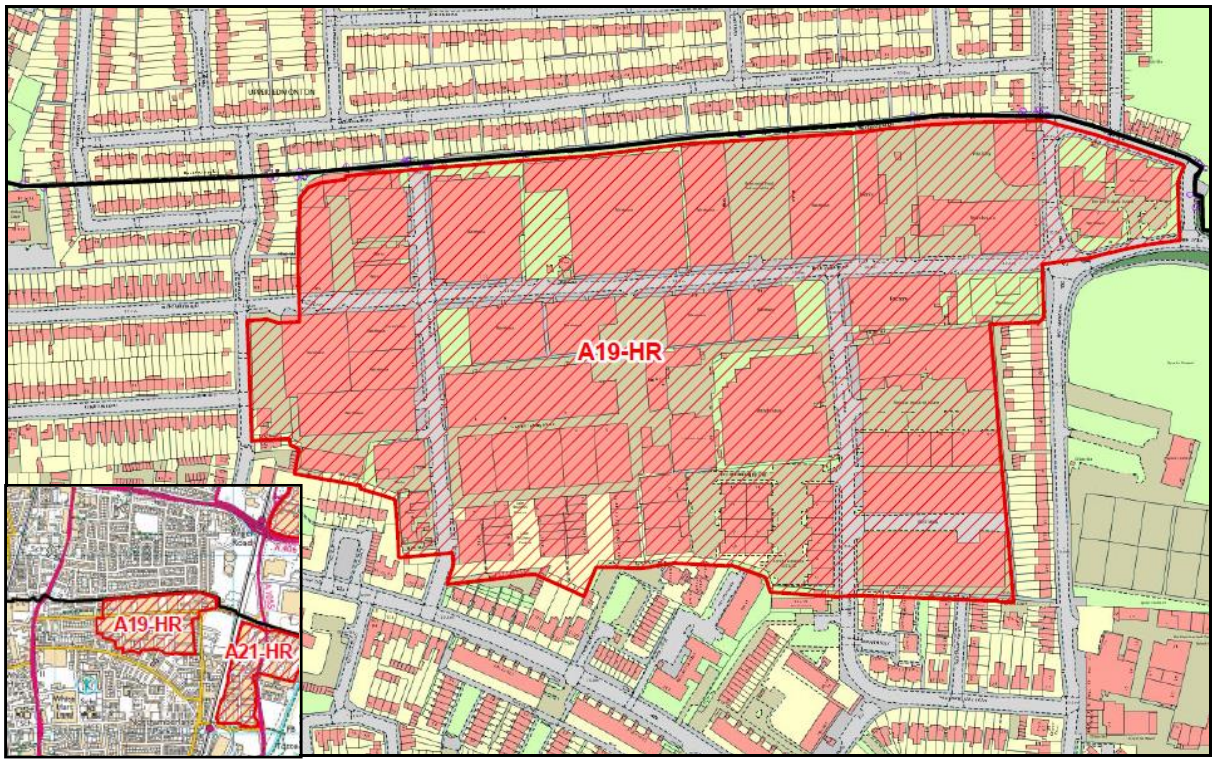
Area Details	
Borough	Hackney
Type of Location	Area
Location Reference	A15-HC – Millfields LSIS
Size	2.19 ha
Area Description	Industrial Site occupied by a Hackney Council Waste Transfer Station and Fleet Depot and a Power Station.
Description of surrounding uses	The area is bordered to the north by the Middlesex Filter Beds Nature Reserve and Hackney Marsh to the east, both of which lie within the Lee Valley Regional Park. Residential properties lie to the south with residential and industrial properties to the

	west.
Planning Information	
Planning Designation	Area is designated as a Local Significant Industrial Site (LSIS)
Relevant Local Plan Policy	Core Strategy (2010), Development Management Local Plan (2015), Policies Map.
Land Use	
Co-location	Location not suitable
Major New Developments	None within location
Decentralised Energy Network	None within location
Details of in-situ infrastructure	National Grid identify the following assets during consultation: i. Underground cables – 400kV route – Hackney to West Ham ii. Hackney 132 kV substation.
Constraints	
Flood Risk	The majority of the area is within Flood Zone 1 (lowest probability of flooding). The eastern, southern and western boundaries lie within Flood Zone 2 (medium probability of flooding) whilst a small section in the southwest corner is within Flood Zone 3 (highest probability of flooding) but benefits from flood defences.



Surface and Groundwater	Not within a Source Protection Zone. The River Lee lies adjacent to the east of the area.
Land Instability	No stability issues identified.
Sensitive Receptors (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Mandeville Primary School is approximately 10m south and residential properties approximately 15m south of the area.
Nature Conservation	The Hackney Marshes lie adjacent to the east of the area and are designated as Metropolitan Site of Importance for Nature Conservation (SINC) to the east lies the River Lee which is designated a Metropolitan SINC whilst the Lee Valley Regional Park to the north west is designated a Borough SINC.
Green Belt and Open Space	Hackney Marsh lies to the north and east and is designated as Metropolitan Open Land. The Lee Valley Regional Park lies adjacent to the east of the area.
Historic Environment	There are three Grade II listed buildings adjacent to the west of site: • Hackney Borough Disinfecting Station (on Heritage at Risk Register) • Shelter House • Caretakers Lodge The Mandeville Primary School which is Grade II listed is situated to the south of the area. Historic England has commented that any development within the area located to the east and north of these assets must address their long term conservation needs in a comprehensive manner. Within Lea Valley Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.
Highways	Access suitable for HGV traffic. However, any future planning application should maintain or improve emissions to air. Any changes that may result in a worsening of air quality should be assessed as part of an air quality impact assessment. Routing arrangements for HGV traffic should be considered as part of any future planning applications.
Conclusion	
Potential Uses	Waste Transfer which is protected under the London Plan. Areas which are not within flood zone 3 are potentially suitable to handle hazardous waste.
Uses unlikely to be suitable	N/A

Potential mitigation measures	There are a number of environmental and amenity issues facing the area such as the proximity of residential properties and the Lee Valley Regional Park, as such the area is not suitable for external facilities. Facilities should therefore be enclosed. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the area are therefore likely to be important mitigation measures. Key mitigation measures should include dust suppression and other measures such as wheel-washing, negative air pressure and rapid-closure doors. Proposals should also protect the existing green infrastructure or provide appropriate replacement landscaping and/or planting and incorporate appropriate boundary treatments. Part of the area are at medium to high risk of surface water flooding the completion of a Flood Risk Assessment and inclusion of SuDs or other appropriate techniques to manage surface water runoff will be key mitigation measures. An appraisal to assess impact of new structures on the historic environment will be required. Building design should be sympathetic to the historic setting.

A19-HR – Brantwood Road, Haringey	
1:4,000 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)	
	
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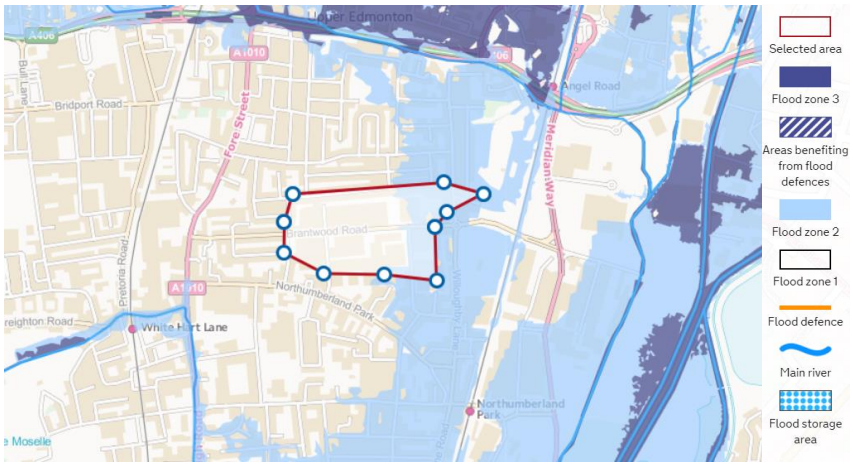
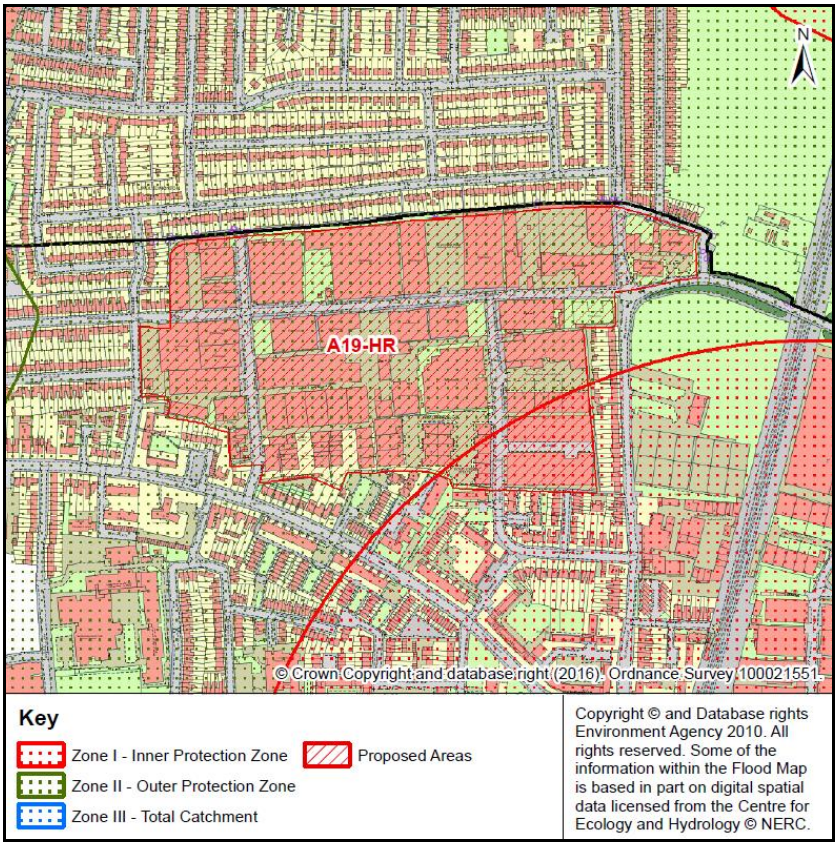
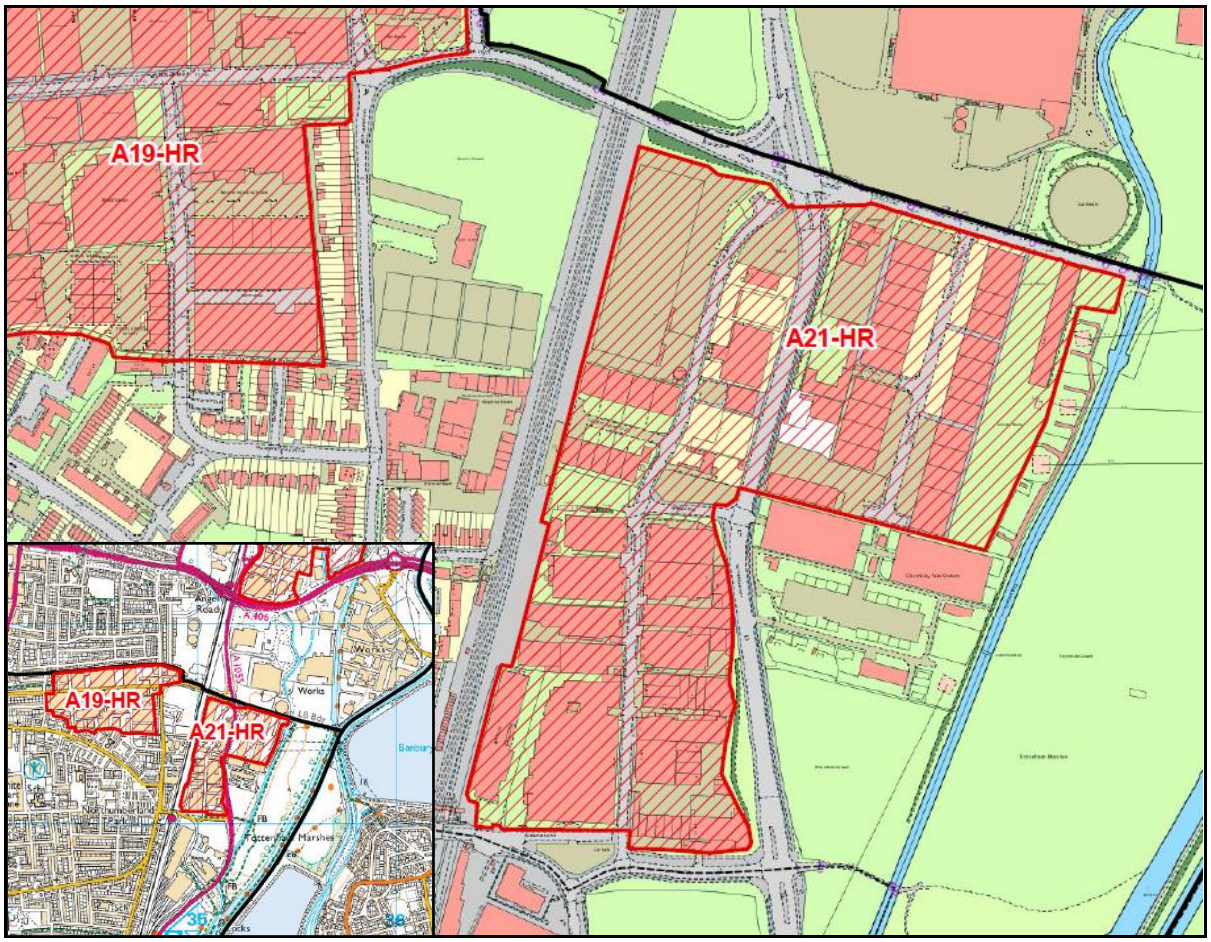
Area Details	
Borough	Haringey
Type of Location	Area
Location Reference	A19-HR – Brantwood Road
Size	16.90 ha
Area Description	Industrial Estate
Description of surrounding uses	The Industrial Estate is surrounded by residential properties on all sides as well as a sports field to the east and industrial land to the north east.
Planning Information	
Planning Designation	The area is designated as a Strategic Industrial Location (SIL)
Relevant Local Plan Policy	The area is safeguarded as a waste site within Harigney's Site Allocations DPD
Land Use	
Co-location	Yes, provided the right sites with the industrial area came forward
Major New Developments	The Industrial Estate lies within an Opportunity Area and a

	Housing Zone as set out within the London Plan. Transport for London has identified the area as lying in close proximity to a proposed Crossrail 2 station.
Decentralised Energy Network	The proposed Upper Lee Valley potential Decentralised Heating Network runs through the area. To the north east of the area is the potential Enfield decentralised energy network.
Details of in-situ infrastructure	None identified
Constraints	
Flood Risk	The site area is largely Flood Zone 1 with the western most part of the site area falling partially within Flood Zone 2. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable. The site area is shown to flood from the Pymmes Brook in the 0.1% AEP event (without defences) and this will increase in the future as a result of climate change with 1% AEP event to cover approximately one quarter of the site area. A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.
	
Surface and Groundwater	The south east corner of the area is within Source Protection Zone 1, the remainder is within Source Protection Zone 2. Facilities within Source Protection Zone 1 should only deal with inert waste unless otherwise agreed with the Environment Agency.

	
Land Instability	No stability issues identified.
Sensitive Receptors (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	The Estate is bound on all sides by residential properties.
Nature Conservation	No features identified
Green Belt and Open Space	Land to the east of site is designated as Significant Local Open Land
Historic Environment	No features identified
Highways	Access suitable for HGV traffic. Area is suitable on highways grounds but details of access and egress would need to be considered as part of any future development proposals.
Conclusion	
Potential Uses	Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, waste transfer, processing and recycling. Areas not within Source Protection Zone 1 are potentially suitable to handle hazardous waste.
Uses unlikely to be suitable	Integrated resource recovery facilities/resource parks, outdoor composting, indoor composting and in-vessel composting.

Potential mitigation measures	There are a number of environmental and amenity issues facing the area such as the proximity of residential properties and Significant Open Space, as such the area is not suitable for external facilities. Facilities should therefore be enclosed and consideration should be given to siting any future proposals towards the centre of the area away from any sensitive receptors. Key mitigation measures should include dust suppression and other measures such as wheel-washing. As parts of the area are at a medium risk of flooding, the completion of a suitable Flood Risk Assessment, and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures. Appropriate measures should also be incorporated to prevent any contamination of groundwater or adjacent watercourses. As proposals may increase the level of traffic generated within the area a traffic impact assessment will be a key mitigation measure.

A21-HR – North East Tottenham (SIL 12), Haringey	
1: 4,850 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)	
	
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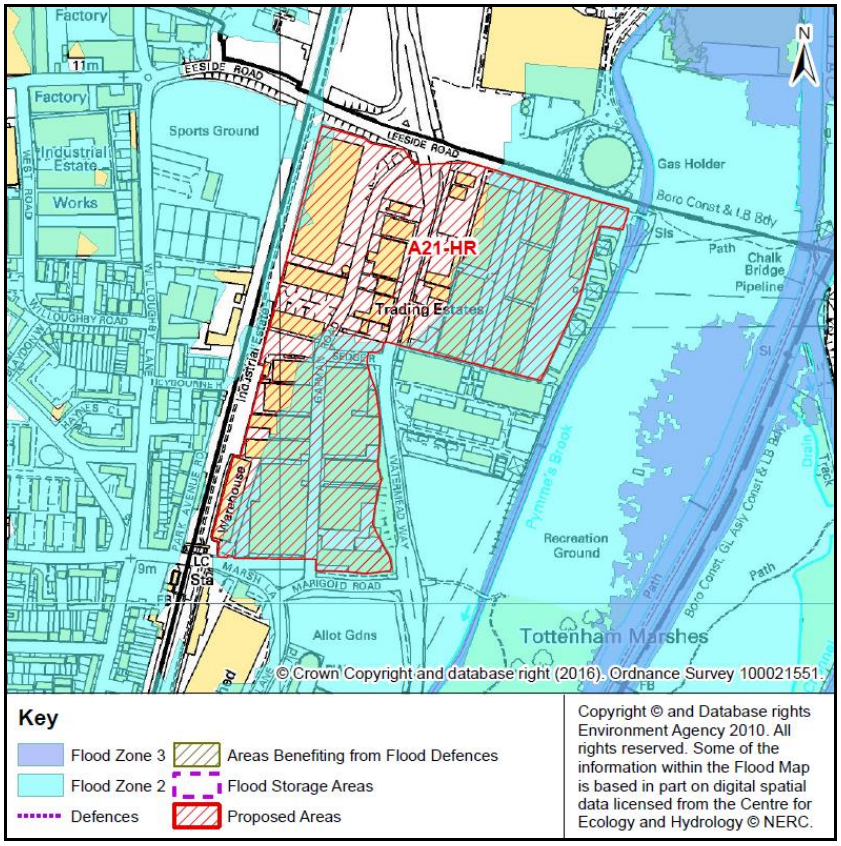
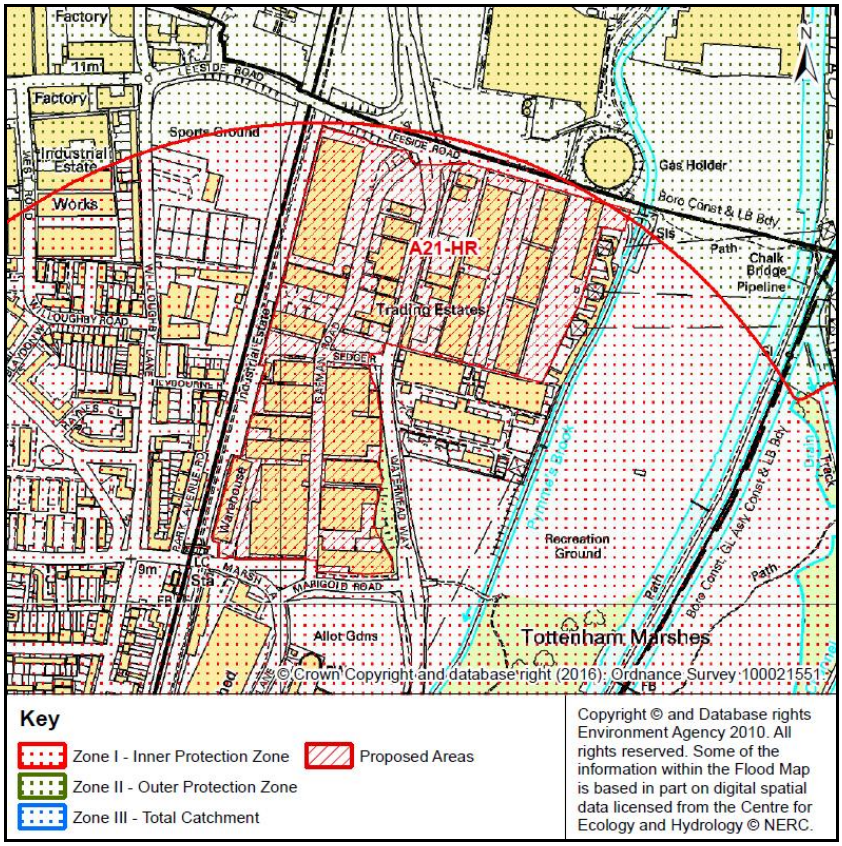
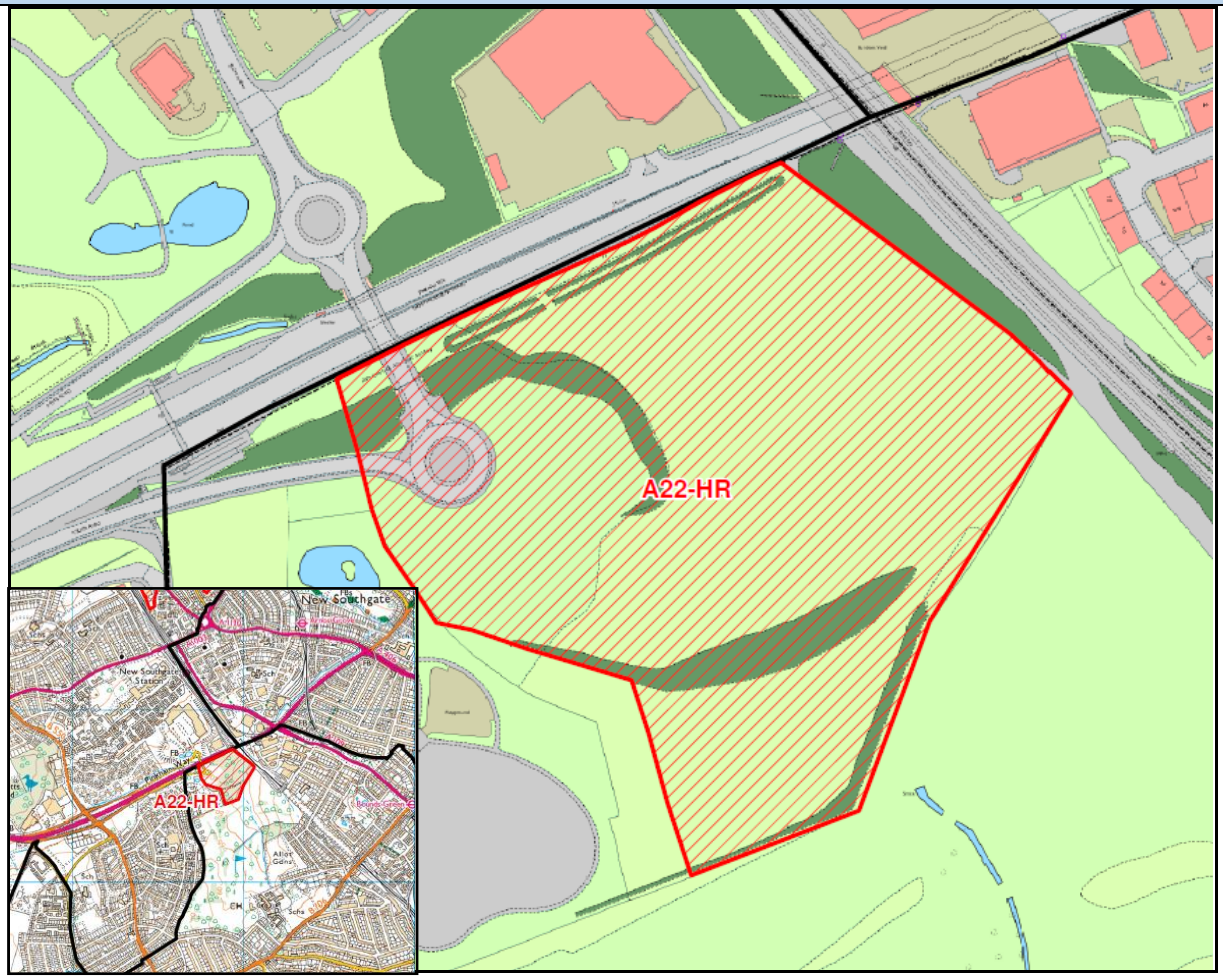
Area Details	
Borough	Haringey
Type of Location	Area
Location Reference	A21-HR – North East Tottenham (SIL 12)
Size	15.40 ha
Area Description	Warehouses and Industrial units within the area.
Description of surrounding uses	To the east of the area lies the Lee Valley Regional Park. To the west, the site is bound by a railway line, with a train station to the south. Beyond the railway line are industrial and residential uses. There are allotments to the south and an Ikea retail development to the north.
Planning Information	
Planning Designation	Area is designated as a Strategic Industrial Location (SIL)

Relevant Local Plan Policy	Area is within an Area of Archaeological Importance and is safeguarded as a waste site within the Site Allocations DPD.
Land Use	
Co-location	Area is large enough to accommodate multiple facilities.
Major New Developments	Area is within an Opportunity Area and Housing Zone as set out within the London Plan. Transport for London has identified the area as lying in close proximity to a proposed Crossrail 2 station.
Decentralised Energy Network	The proposed Upper Lee Valley Decentralised Heating Network runs adjacent to the area. North of the area is the potential Enfield decentralised energy network.
Details of in-situ infrastructure	National Grid identify the following assets close to site: i. Underground cables – 275kV route – St John's Wood to Tottenham. ii. Tottenham 275kV site and overhead transmission lines adjacent to the site.
Constraints	
Flood Risk	The majority of area is within Flood Zone 2 (medium probability of flooding). The remainder is in Flood Zone 1 (lowest probability of flooding). The site is also at risk from surface water flooding.



Surface and Groundwater	The whole of the area is within Source Protection Zone 1. Facilities within Source Protection Zone 1 should only deal with inert waste unless otherwise agreed with the Environment Agency. Pymmes Brook Lies 10m east of site. 
Land Instability	No stability issues identified.
Sensitive Receptors (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Residential properties lie in close proximity to the west of the area but are separated from the area by the railway line. Allotments lie to the south of the area.
Nature Conservation	Borough Site of Importance for Nature Conservation lies adjacent to west and north east corner of the area.
Green Belt and Open Space	Lee Valley Regional Park borders the area to the east. Within the Regional Park is an area of Green Belt Land which lies approximately 13m east of the area.
Historic Environment	Within the Lee Valley Archaeological Priority Area.- Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.

Highways	Access is suitable for HGV traffic. However, there are known congestion issues at the Leeside Road/Watermead Way junction at peak periods. The area is considered suitable but details of access and egress would need to be considered as part of any future development proposals.
Conclusion	
Potential Uses	Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, waste transfer, processing and recycling
Uses unlikely to be suitable	Integrated resource recovery facilities/resource parks, outdoor composting, indoor composting and in-vessel composting. The area is unlike to be suitable for hazardous waste.
General mitigation measures	There are a number of environmental issues facing the area such as the proximity of the area to a designated SINC. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the area are therefore likely to be important mitigation measures. Consideration should be given to any potential impacts on air quality and measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site and providing wheel washing facilities could help mitigate any potential impacts. In addition, as parts of the area are at a medium risk of flooding, the completion of a suitable Flood Risk Assessment, and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures. Measures to protect ground water will need to be agreed with the Environment Agency.

A22-HR – Friern Barnet Sewage Works (LEA 4) /Pinkham Way, Haringey	
	
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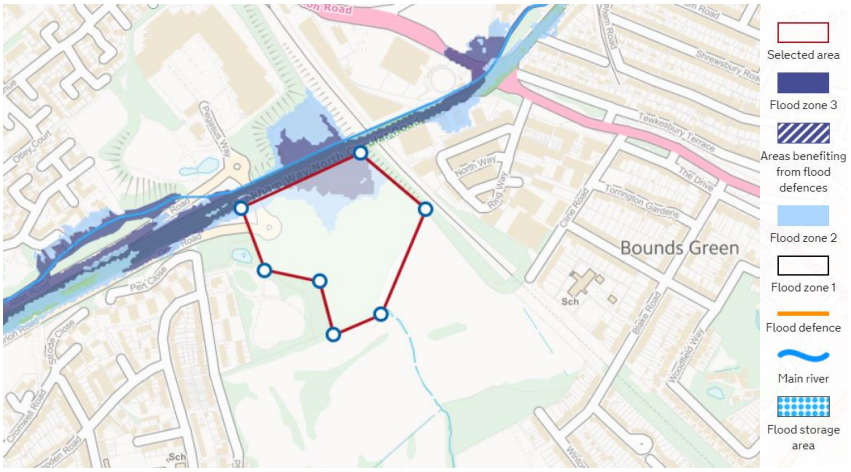
Area Details	
Borough	Haringey
Type of Location	Area
Location Reference	A22-HR – Friern Barnet Sewage Works (LEA 4) /Pinkham Way
Size	5.95 ha
Area Description	Land is currently unused and has become over grown with trees and vegetation.
Description of surrounding uses	Pinkham Way and retail park to north, industrial properties east. Golf course south and a park and residential properties to the west.
Planning Information	
Planning Designation	The Area is designated a Local Employment Area (LEA) and a Borough SINC.

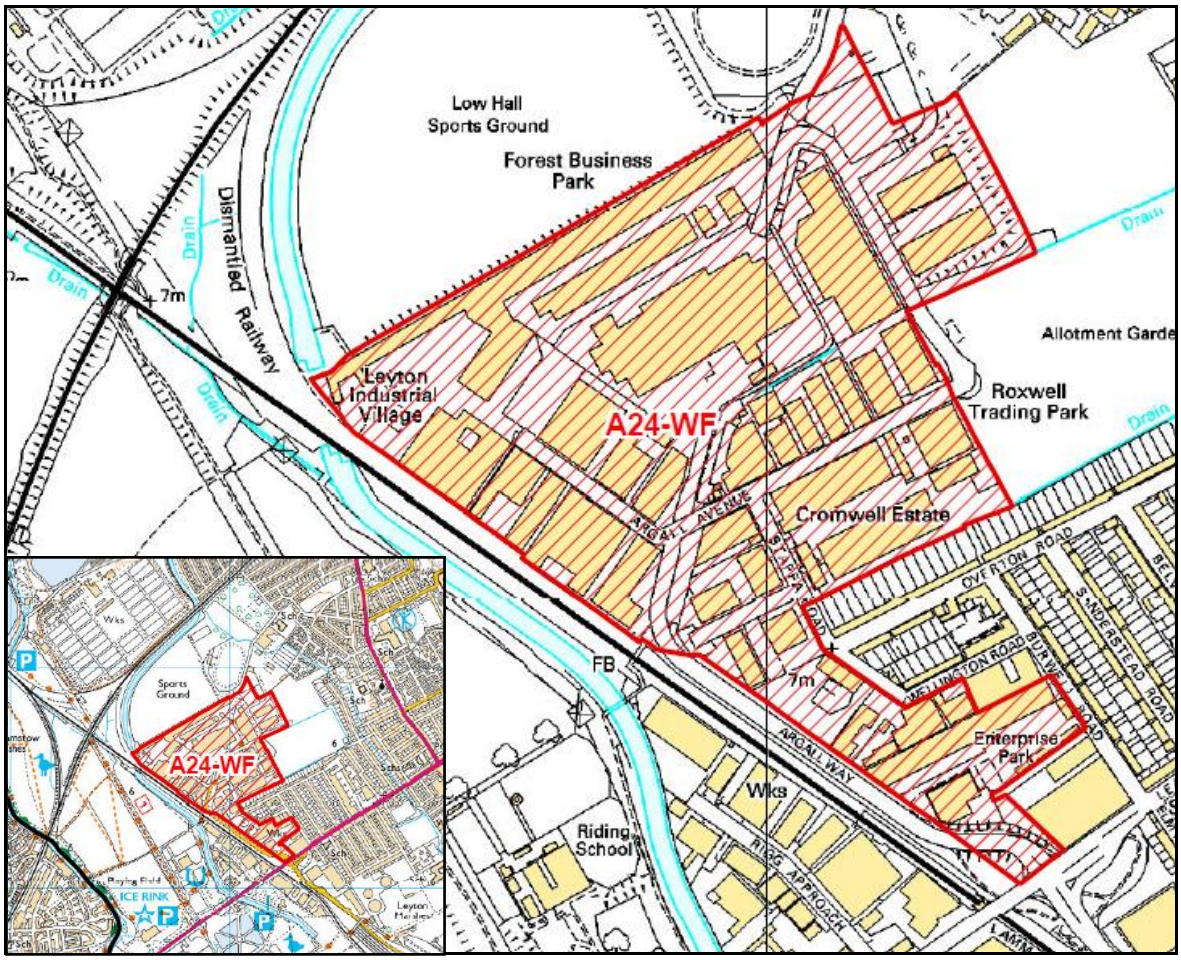
Relevant Local Plan Policy	Former Friern Barnet Sewage Works / Pinkham Way Area has the following planning designations on the site: Site of Importance for Nature Conservation Grade 1, Local Employment Area: Employment Land, Flood Zone 2 and 3 (part). The area is subject to the following key Local Plan policies: - SP13: Open Space and Biodiversity, DM 20: Open Space and Green Grid, SP8: Employment, DM 37: Maximising the Use of Employment Land and Floorspace, and DM 24: Managing and Reducing Flood Risk
Land Use	
Co-location	This Area would allow for co-location with complementary activities due to its size and highway accessibility.
Major New Developments	None identified locally
Decentralised Energy Network	The Enfield potential Decentralised Energy area lies approximately 65m northeast of Friern Barnet. Not considered to be a practical option due to distance from potential users. Friern Barnet is in an area of low energy consumption (as Area undeveloped). Areas northeast, east and west of Area are high energy consumption zones.
Details of in-situ infrastructure	None identified
Constraints	
Flood Risk	The Area is largely within Flood Zone 1 with an area to the north of the Area falling partially within Flood Zones 2 and 3. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable. Part of the Area is shown to flood from the Bounds Green Brook in the 1% AEP event (without defences) and this will potentially increase in the future as a result of climate change with 1% AEP event covering a greater extent of the ~~site~~ Area. A site specific flood risk assessment will therefore be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.

	
Surface and Groundwater	Not within a Source Protection Zone or principal aquifer. Bounds Green Brook lies approximately 40m north of Area. A pond lies approximately 10m west of Area and unnamed water course lies approximately 20m south of Area.
Land Instability	The Environment Agency records historic landfilling in the area. This may represent a ground stability issue and as such further investigation will be required at the planning application stage.
Sensitive Receptors (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Residential properties lie west of Friern Barnet. Given the scale of the area there is scope to create a buffer around any waste management facility and orientate the facility away from residents.
Nature Conservation	Area is within a Borough Site of Importance for Nature Conservation which includes the adjacent Park and Golf Club. A number of ecology surveys have been undertaken and identified habitat of "potential value to a number of protected and notable species". There is an ecological corridor to the east of the area along the railway embankment. Japanese Knotweed and Giant Hogweed have been identified in abundance across Area. There is currently no active management of the SINC.
Green Belt and Open Space	Land adjacent to the south and west of the area is designated as Metropolitan Open Land.
Historic Environment	No features identified

Highways	The Area would require the creation of an access to the roundabout on Orion Road/Pegasus Way. This would need to be designed to allow HGVs and refuse vehicles. The existing roundabout is suitable for these movements. Access to the North Circular is relatively easy from either Orion Road [heading east] or from Pegasus Way [to head west]. The Colney Hatch Lane/North Circular Road junction suffers from congestion at peak times. Use of the Area for waste would add to HGV/refuse vehicle movement but is unlikely to have a significant impact on the operation of this junction, based on 60 in/out movements per day for refuse vehicles plus 40 bulk transport in/out movements.
Conclusion	
Potential Uses	Waste transfer, Recycling, Composting, including indoor in-vessel composting and outdoor composting. Areas not lying within Flood Zone 3 are potentially suitable to handle hazardous waste.
Uses unlikely to be suitable	N/A
Potential mitigation measures	The Area covers land owned separately by the North London Waste Authority and the London Borough of Barnet. There are a number of policy, environmental and amenity issues facing this area, although it previously accommodated a sewage treatment works. The Area has revegetated, contains a number of mature trees and is designated as a SINC. Due to the number of designations affecting this Area, only a proportion of the overall area will be suitable for development. Given the land is in two ownerships and Barnet has no current plans to develop a waste facility, this is likely to impact on the deliverability of the site in its entirety. A smaller part of the site area in NLWA's single ownership is therefore most likely to accommodate any development. The location of new development within the Area will be assessed against flood risk criteria in the NPPF and a site-specific flood risk assessment will be required. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere Given the constraints on the Area, the site footprint should be minimised, taking into account the necessary operational

	elements of a waste facility, for example space for turning and parking for waste vehicles, processing area with sufficient room for equipment for waste treatment, and areas for the storage and stockpiling of materials. This should be on level areas where feasible. The location of new development should take the opportunity to create an appropriate buffer zone between the proposed facility and nearby sensitive receptors, including residential properties. Any new waste facility in this Preferred Location will need to be in line with the Haringey's Local Plan and the London Plan. There are community concerns around the development of a waste facility within this Area and how this will affect the natural environment, flood risk and biodiversity in the Area. Specific policy considerations on this topic are set out below. Consultation with the local community will be required for any proposed waste facility on this site. In line with London Plan policy G6: 'Biodiversity and access to nature', development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. In line with London Plan policy G7: 'Trees and Woodland', development proposals should ensure that, wherever possible, existing trees of value are retained. In line with Local Plan policy DM19: 'Nature Conservation', development proposals should protect and enhance the nature conservation value of the area. Development that has a direct or indirect adverse impact upon important ecological assets will only be permitted where the harm cannot be reasonably avoided and it has been suitably demonstrated that appropriate mitigation can address the harm caused. In line with London Plan Policy G6D, any development needs to achieve biodiversity net gain that leaves the biodiversity in a better state than before the development. This should be outside the areas at risk of flooding (Zone 2 and 3), suitably buffered from the ecological corridor to the east of the area, and subject to up-to-date Biodiversity and Wildlife surveys, be on land that is not identified as having priority species or habitats. An appropriate ecological survey will be required to identify significant ecological features to retain or replace. Consideration should be given to the retention and protection of existing mature trees and the designation and management of

	appropriate areas of habitat to be retained and enhanced. Mitigation measures should include continued habitat connectivity with the adjacent green spaces and ecological corridor along the railway embankment that needs to be retained and enhanced. In line with Local Plan policy DM21: 'Sustainable Design, Layout and Construction', buildings within the development should be designed to complement nature conservation by maximising opportunities to enhance biodiversity, including through appropriate landscaping, Sustainable Drainage Systems, living roofs and green walls. Mitigation measures would be required to protect the amenity of sensitive receptors including hours of working, noise and odour suppression. Provision of an acceptable access ~~of~~ from Orion Road Roundabout would be required. Any application should demonstrate how public access to the remainder of the Area could be achieved. The Muswell Hill Golf Course Brook runs in culvert through the Pinkham Way Priority Area. Opening up the watercourse could bring multiple flood risk, biodiversity and amenity benefits and should be given consideration as site-specific development proposals are advanced. Any application will need to have regard to the needs of different users of the Area to ensure the safe operation of the waste management facility. A contamination and ground stability appraisal would be required to assess potential impacts from the historic landfill within the Area boundary. As parts of the Area fall within flood Zone 2 and 3, the completion of a suitable Flood Risk Assessment and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures. Any necessary SuDS should be designed to integrate with other nature conservation elements.

A24-WF – Argall Avenue, Waltham Forest	
1:6,950 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)	
	
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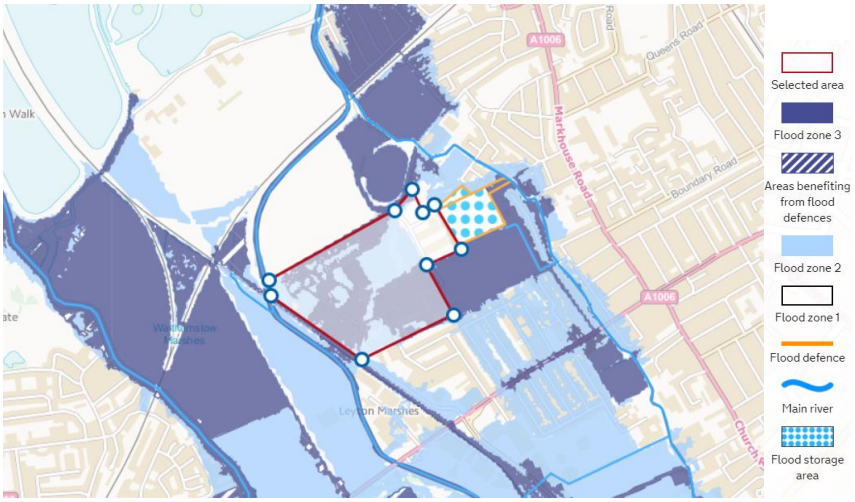
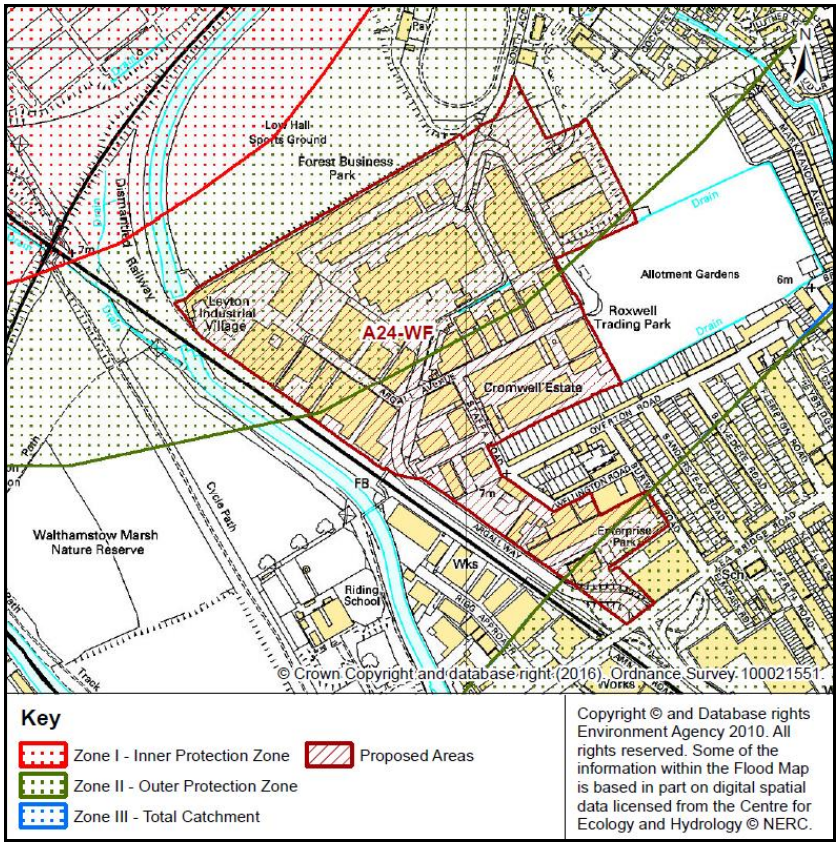
Area Details	
Borough	Waltham Forest
Type of Location	Area
Location Reference	A24-WF – Argall Avenue
Size	26.80 ha
Area Description	The area is an Industrial Estate.
Description of surrounding uses	There is a sports ground to the north, Lea Valley Park, allotments and residential properties to the east, industrial properties to the south and a railway line to the west.
Planning Information	
Planning Designation	The area is a designated Strategic Employment Area (SEA) and lies within an Airfield Safeguarding Area.

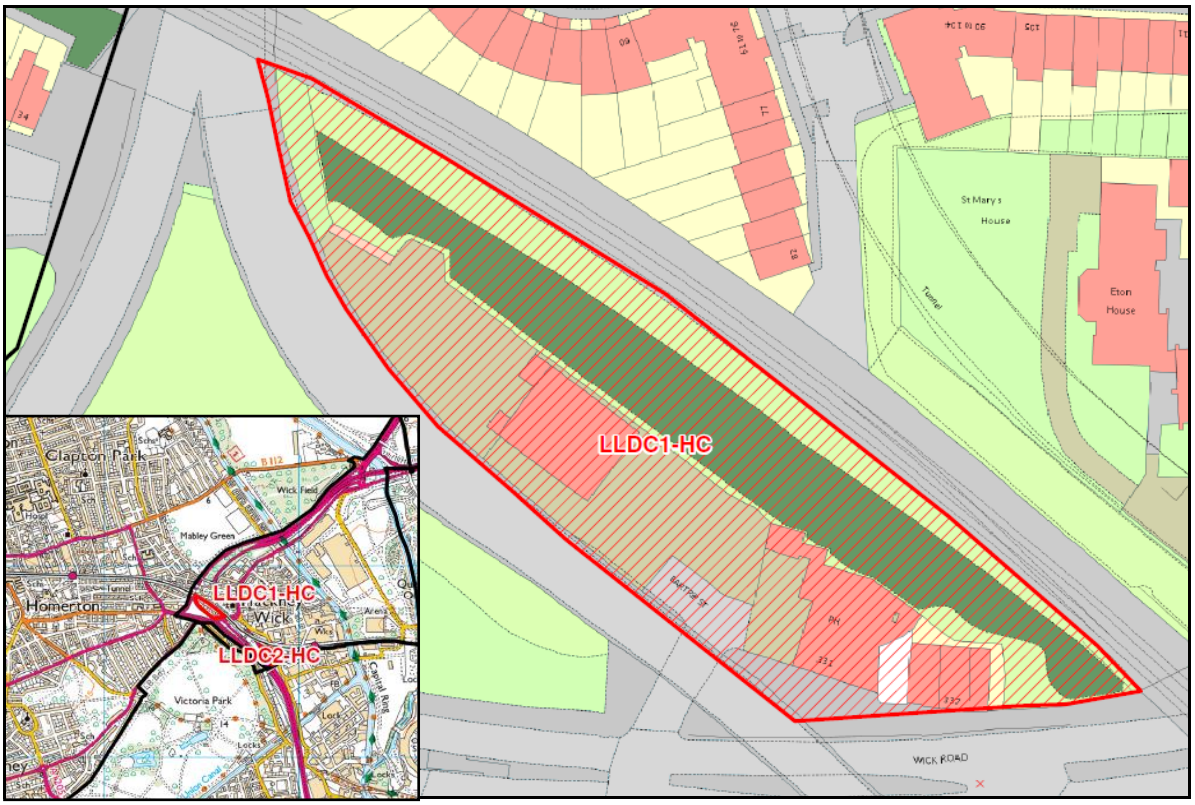
Relevant Local Plan Policy	Core Strategy: CS3, CS4, CS6, CS7, CS8, CS13 Development Management Policies: DM10, DM13, DM14, DM17, DM18, DM19, DM23, DM24, DM32, DM36
Land Use	
Co-location	Size of area would allow for co-location of facilities if plots became available.
Major New Developments	Argall Avenue is within an Opportunity Area and a Housing Zone as set out within the London Plan.
Decentralised Energy Network	Argall Avenue is within the Waltham Forest potential Decentralised Energy Area and is within the Hinterland Upper Lea Valley Opportunity Area.
Details of in-situ infrastructure	National Grid identify the following assets during consultation: i. Intermediate Pressure Gas Distribution pipeline (pipeline ref NL0075 Lea Valley Viaduct to Leabridge). ii. Over Head Lines lie adjacent to the west of site, Hackney – Tottenham.
Constraints	

Flood Risk	The site area falls partially within Flood Zone 1, Flood Zone 2 and Flood Zone 3. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable. However, development should be avoided on the part of the site area which lies within the functional floodplain. The site area is shown to flood from the River Lee and Dagenham Brook in the 1% AEP event (without defences) and this will potentially increase with the future as a result of climate change with 1% AEP event covering a greater extent of the site area. A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission. For any proposed development which involves an increase in built footprint within the modelled extent of the 1 in 100 chance in any year flood event, taking the impacts of climate change into account, or where the footprint has been moved into a deeper area of floodplain than the existing built footprint, floodplain compensation will need to be provided on a volume-for-volume and level-for-level basis.

	
Surface and Groundwater	Northern half and southern extent of Argall Avenue are within Source Protection Zone 2. Lee Flood Relief Channel runs adjacent to the west of area. Dagenham Brook lies to the east of area. 
Land Instability	An historic landfill lies adjacent to the north of area under Low Hall Sports ground. There is a potential for stability issues however Argall Avenue is completely developed which suggests any issue can be addressed. Further investigation will be required at the planning application stage.

Sensitive Receptors (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Residential dwellings lie to the south east of Argall Avenue and allotments to the east.
Nature Conservation	Low Hall Farm Borough Site of Importance for Nature Conservation (SINC) lies adjacent to the east of area.
Green Belt and Open Space	Walthamstow Marshes a designated Metropolitan Open Space lies adjacent to the north and west. The Lee Valley Regional Park borders the area to the north, northeast, south and west and covers the north east corner of area.
Historic Environment	Within the River Lea and Tributaries Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.
Highways	Capacity on Lea Bridge Road will be reduced as part of the Mini Holland cycle superhighway. Concerns raised over impact of increased traffic on air quality.
Conclusion	
Potential Uses	Waste transfer, indoor / in-vessel composting, processing and recycling. Areas not lying within Flood Zone 3 are potentially suitable to handle hazardous waste.
Uses unlikely to be suitable	Integrated resource recovery facilities/resource parks, Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment and outdoor composting.
General mitigation measures	There are a number of environmental and amenity issues facing the area such as the proximity of residential properties and the Lee Valley Regional Park which includes a Borough SINC and Metropolitan open land, as such the area is not suitable for external facilities. Facilities should therefore be enclosed and consideration should be given to siting any future proposals away from any sensitive receptors. Key mitigation measures should include dust suppression and other measures such as wheel-washing, negative air pressure and rapid-closure doors. Given the proximity of a borough SINC, any future planning application should include an assessment of the areas ecological value and potential impacts from development. Developments adjacent the Lee Valley Regional Park should include mitigation measures such as appropriate landscaping and/or planting and incorporate appropriate boundary treatments or park improvements to protect the recreational potential of the park. As parts of the area are at a medium to high risk of flooding, the completion of a suitable Flood Risk Assessment, and the incorporation of SuDS or other techniques to manage surface

	water runoff will be key mitigation measures. Appropriate measures should also be incorporated to prevent any contamination of groundwater or adjacent watercourses. As the area has poor air quality an air quality impact assessment will be a key mitigation measure.

LLDC1-HC – Bartip Street LSIS, Hackney	
1:950 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)	
	
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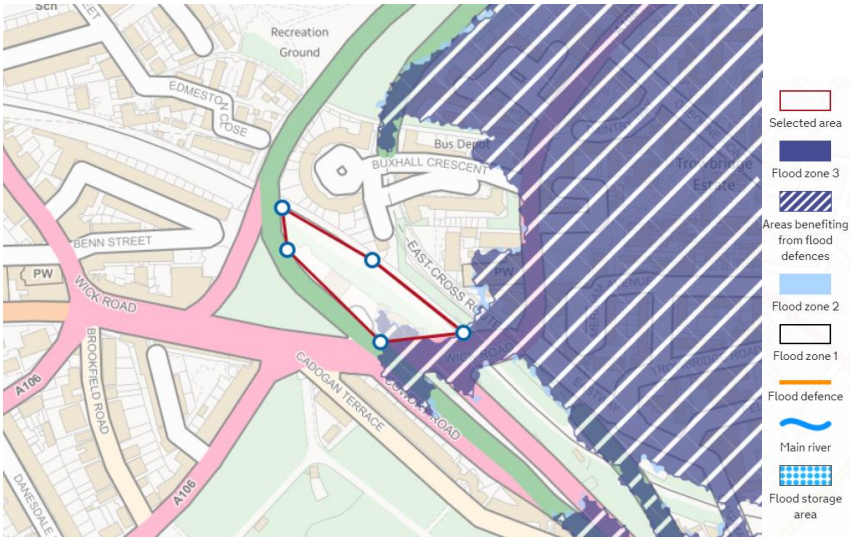
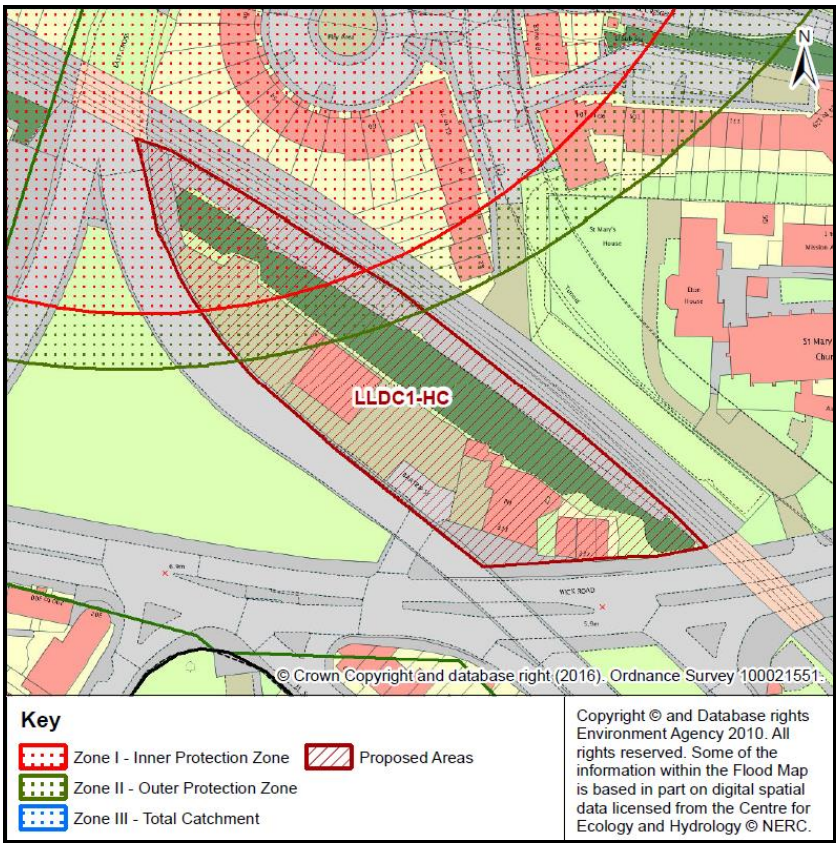
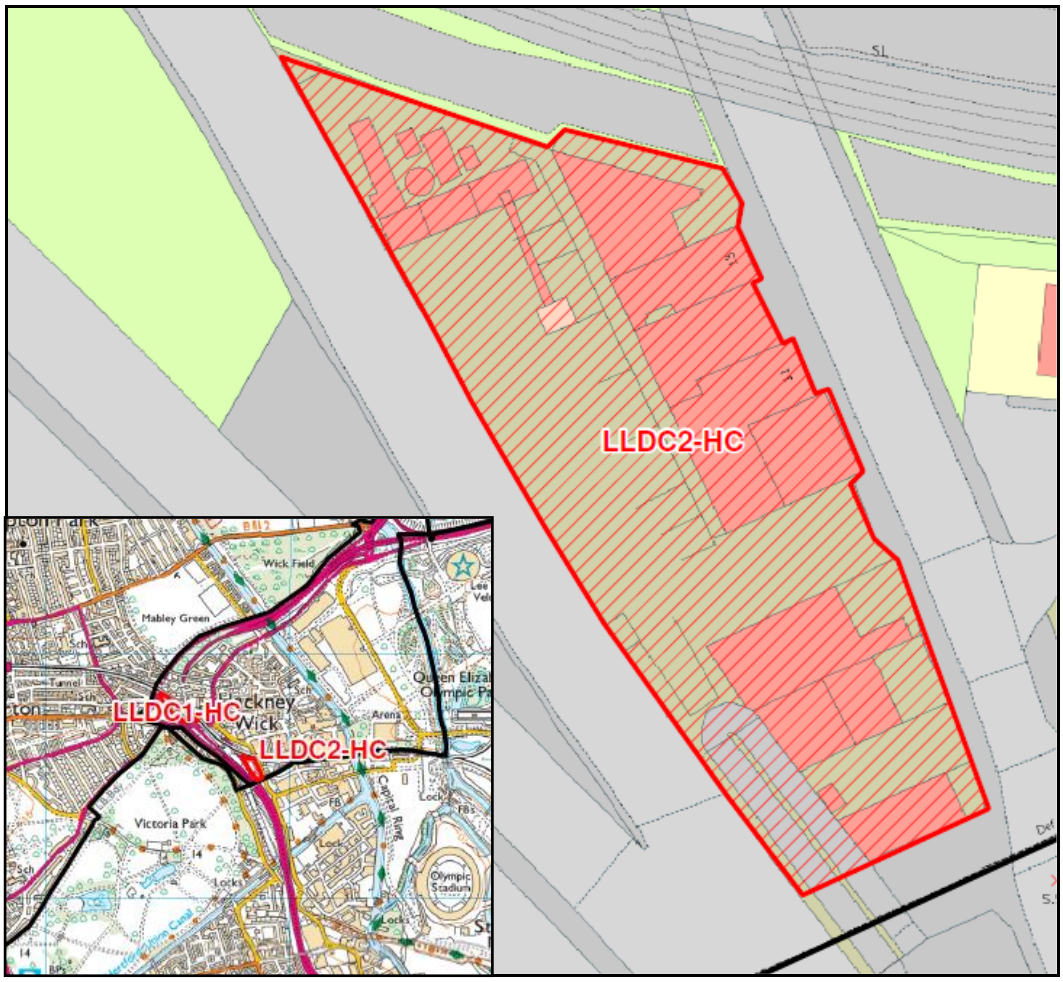
Area Details	
Borough	Hackney
Type of Location	Area
Location Reference	LLDC1-HC – Bartip Street LSIS
Size	0.60 ha
Area Description	Area contains small scale industrial, storage and distribution uses and residential
Description of surrounding uses	The area is bound on all sides by road and railway lines. There is some green space to the south west. Residential properties and a church lie in close proximity.
Planning Information	
Planning Designation	Area is designated as a Locally Significant Industrial Site (LSIS) and lies within an Airfield Safeguarding Area.
Relevant Local Plan Policy	Policy B.1, London Legacy DC Local Plan Policy IN.2 London Leagcy DC Local Plan
Land Use	

Co-location	No, area is too small for co-location
Major New Developments	Bartip St LSIS is within an Opportunity Area as set out in the London Plan.
Decentralised Energy Network	The area is partly within Hackney Wick potential Decentralised Energy area.
Details of in-situ infrastructure	None identified
Constraints	
Flood Risk	The site area is largely within Flood Zone 1 with the southern most part falling partially within Flood Zones 2 and 3, noting that the Flood Zone 3 is within an area benefiting from defence. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable. The site area is shown to flood from the River Lea / Lee Navigation in the 1% AEP event (without defences) and this will potentially increase in the future as a result of climate change with 1% AEP event covering a greater extent of the site. The River Lea / Lee Navigation benefits from defences and a site-specific flood risk assessment should consider how much these benefit the site area. A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission. Part of the site area benefits from existing flood defences.

	
Surface and Groundwater	The north of area is within Source Protection Zone 1 and 2. Facilities within Source Protection Zone 1 should only deal with inert waste unless otherwise agreed with the Environment Agency. 
Land Instability	No issues identified.
Sensitive Receptors (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Residential properties and a church lie in close proximity to the site. A Gypsy and traveller site is located to the south of the site (Allocation SA1.9 in the LLDC Local Plan).
Nature Conservation	No features identified

Green Belt and Open Space	Metropolitan Open Land lies 100m to the north of the area.
Historic Environment	Four listed buildings lie to the north east within 100m of the area: • Grade II listed Church of St Mary of Eton with St Augustine, • Grade II listed Eton House, • Grade II listed Mission Hall to North of Church of St Mary of Eton and • Grade II listed Tower to North of Church of St Mary of Eton. Historic England has noted that the setting of Victoria Park Registered Park and Garden and Conservation Area to the south should be considered.
Highways	The A12 is associated with significant air pollution. An air quality impact assessment would be required as part of any future planning application. Access to the area is off Wick Road which forms part of the Transport London Road Network; as such Transport for London should be consulted on any future development proposals.
Conclusion	
Potential Uses	Waste transfer, processing and recycling. Areas not within Flood Zone 3 or Source Protection Zone 1 are potentially suitable to handle hazardous waste.
Uses unlikely to be suitable	Integrated resource recovery facilities/resource parks, Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.
Potential mitigation measures	There are amenity issues facing the area such as the proximity of residential properties and a travellers site, as such the area is not suitable for external facilities. Facilities should therefore be enclosed. As necessary an assessment of ecological value of the area should be included as part of any future planning application. Key mitigation measures should include dust suppression and other measures such as wheel-washing, negative air pressure and rapid-closure doors. Parts of the area are at medium to high risk of surface water flooding the completion of a Flood Risk Assessment and inclusion of SuDs or other appropriate techniques to manage surface water runoff will be key mitigation measure. Appropriate measures should also be incorporated to prevent any contamination of groundwater An appraisal to assess impact of new structures on the historic environment will be required. Building design should be sympathetic to the historic setting.

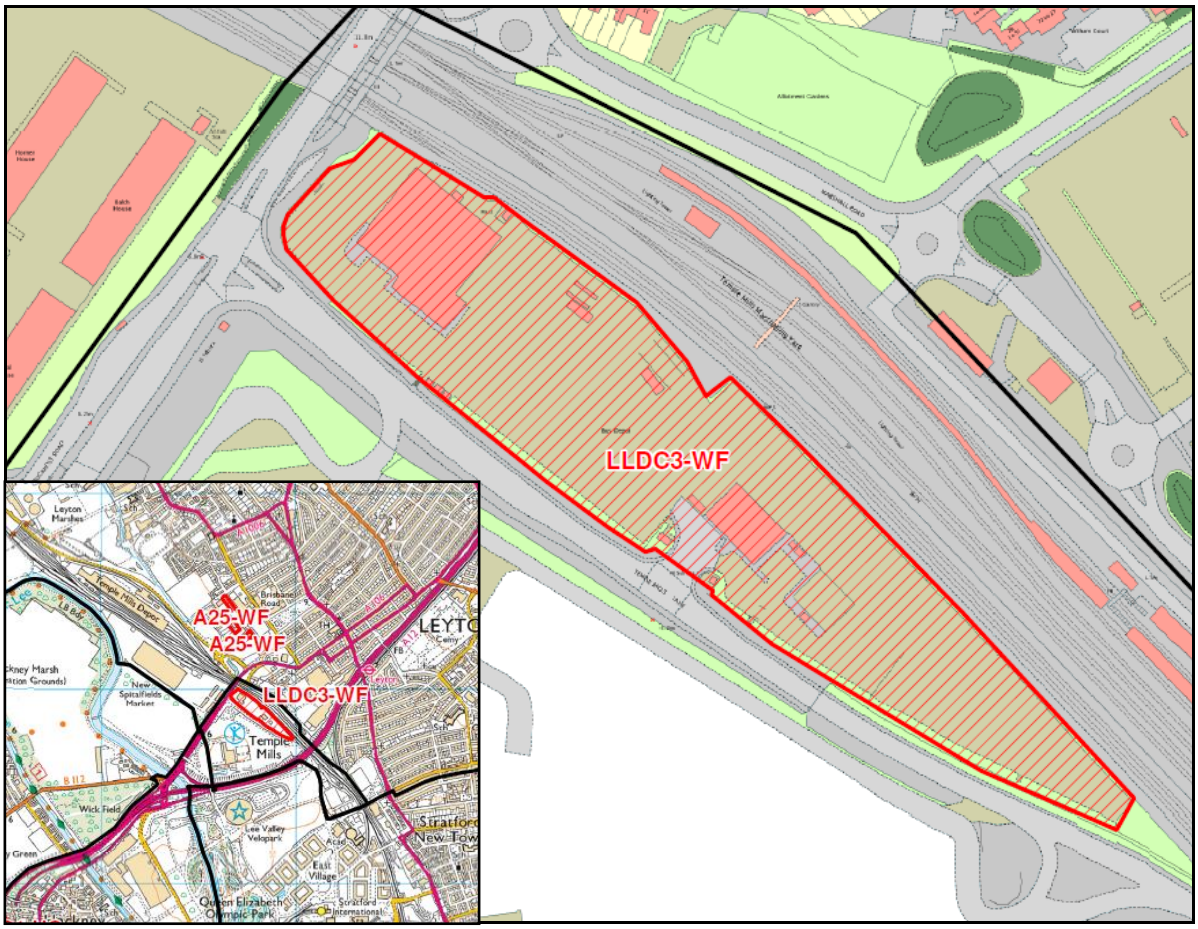
	As proposals may increase the level of traffic generated within the area an air quality impact assessment will be a key mitigation measure.

LLDC2-HC – Chapman Road LSIS (Formerly Palace Close SIL), Hackney	
1:800 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)	
	
© Crown Copyright and database right (2016). Ordnance Survey 100021551	
Area Details	
Borough	Hackney
Type of Location	Area
Location Reference	LLDC2-HC – Chapman Road LSIS
Size	0.33 ha
Area Description	The area is occupied by industrial properties.
Description of surrounding uses	The area is bound to the west by the A12 and to the east by Chapman Road. There is a gypsy and traveller site to the east with industrial uses beyond. The area is bound to the north by a railway line.

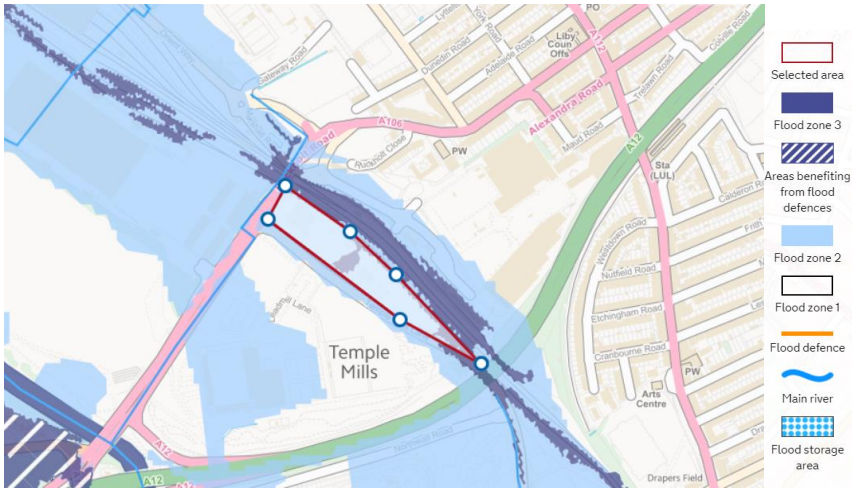
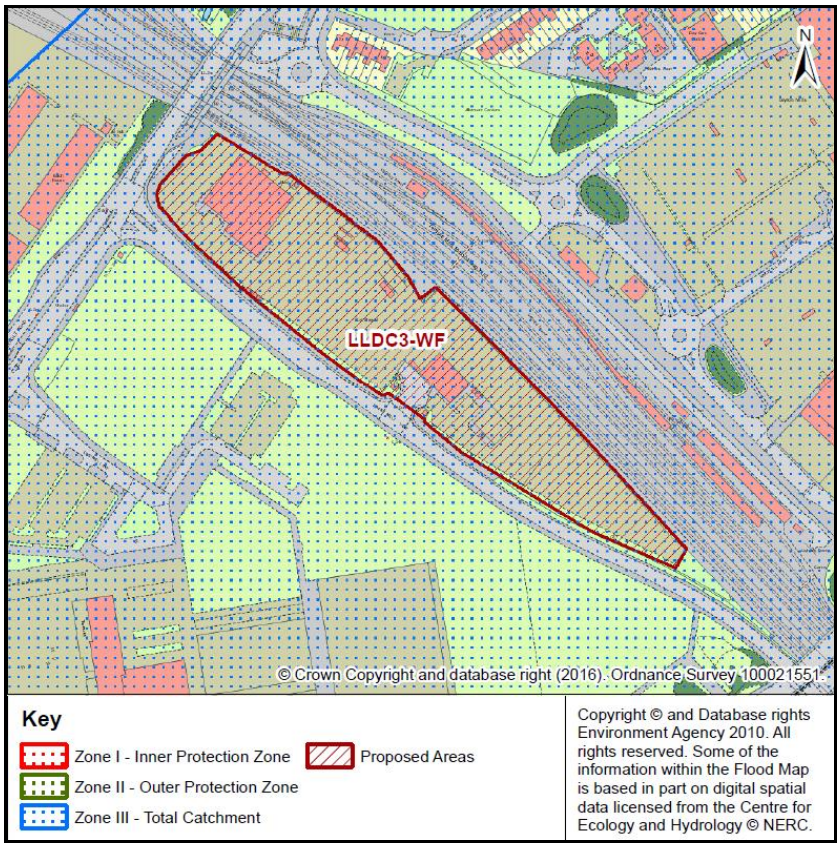
Planning Information	
Planning Designation	Area is designated as a Locally Significant Industrial Site (LSIS)
Relevant Local Plan Policy	Policy B.1, London Legacy DC Local Plan Policy IN.2 London Legacy DC Local Plan
Land Use	
Co-location	No the area is too small to contain more than one use.
Major New Developments	Chapman Road LSIS lies within an Opportunity Area as set out within the London Plan.
Decentralised Energy Network	The area is approximately 500m from an existing Decentralised Heat Network and is within the Hackney Wick potential Decentralised Energy area.
Details of in-situ infrastructure	None identified
Constraints	
Flood Risk	The site area falls partially within Flood Zone 1 and 2 but is largely in Flood Zone 3, noting that this is within an area benefiting from defences. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable. The site area is shown to flood from the River Lea / Lee Navigation in the 1% AEP event (without defences) and this will potentially increase in the future as a result of climate change with 1% AEP event covering a greater extent of the site area. The River Lea / Lee Navigation benefits from defences and a site-specific flood risk assessment should consider how much these benefit the site area. A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission. The majority of the site area benefits from existing flood defence.

Surface and Groundwater	The area is not within a Source Protection Zone.
Land Instability	No stability issues identified.
Sensitive Receptors (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Permanent Gypsy and Traveller site located to the east of Chapman Road LSIS. Residential properties lie 55m west.
Nature Conservation	No features identified
Green Belt and Open Space	No features identified
Historic Environment	Victoria Park Conservation Area lies 75m east and 140m west of the area. Historic England has commented that the sensitivity of Victoria Park Conservation Area and Registered Historic Park and Garden setting should be considered.
Highways	The A12 is associated with significant air pollution therefore air emissions would need to be managed and mitigated for. An air quality impact assessment would be required as part of any future planning application. Vehicle swept path analysis tracking would be required at localised junctions in order to safeguard (parking control) the efficient and safe manoeuvring of HGV traffic.
Conclusion	
Potential Uses	Waste transfer, processing and recycling
Uses unlikely to be suitable	Integrated resource recovery facilities/resource parks, Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.
Potential mitigation measures	There are amenity issues facing the area such as the proximity of the travellers site and residential properties, as such the area is not suitable for external facilities. Facilities should therefore be

	enclosed. As necessary an assessment of ecological value of the area should be included as part of any future planning application. Key mitigation measures should include dust suppression and other measures such as wheel-washing, negative air pressure and rapid-closure doors. The area is at a high risk of surface water flooding the completion of a Flood Risk Assessment and inclusion of SuDs or other appropriate techniques to manage surface water runoff will be key mitigation measure. An appraisal to assess impact of new structures on the historic environment will be required. Building design should be sympathetic to the historic setting. As proposals may increase the level of traffic generated within the area an air quality impact assessment will be a key mitigation measure.

LLDC3-WF – Bus Depot, Temple Mills Lane, Waltham Forest	
1:2,150 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)	
	
© Crown Copyright and database right (2016). Ordnance Survey 100021551	
Area Details	
Borough	Waltham Forest
Type of Location	Area
Location Reference	LLDC3-WF – Bus Depot, Temple Mills Lane
Size	2.1 ha
Area Description	Bus Depot
Description of surrounding uses	Railway lines border the north and east of the area with residential properties, allotments and retail beyond, Easton Park and New Spitalfields Market lie to the south. The Lee Valley Regional Park lies adjacent to the south of the area.
Planning Information	
Planning Designation	Area is designated as a Locally Significant Industrial Site (LSIS). The area is within an Airfield Safeguarding Area.

Relevant Local Plan Policy	Policy B.1, London Legacy DC Local Plan Policy IN.2 London Legacy DC Local Plan
Land Use	
Co-location	The area is potentially large enough to accommodate more than one facility.
Major New Developments	The depot lies within an Opportunity Area and a Housing Zone lies approximately 15m north as set out in the London Plan. The area is within the 2012 Olympic Legacy Park.
Decentralised Energy Network	There is an existing Decentralised Heat Network approximately 320m southwest of area.
Details of in-situ infrastructure	None identified
Constraints	
Flood Risk	The site area is largely Flood Zone 2 with a small area of Flood Zone3. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable. The site area is shown to flood from the River Lee and Dagenham Brook in the 1% AEP event (without defences) and this will potentially increase with the future as a result of climate change with 1% AEP event covering a greater extent of the site area. A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission. For any proposed development which involves an increase in built footprint within the modelled extent of the 1 in 100 chance in any year flood event, taking the impacts of climate change into account, or where the footprint has been moved into a deeper area of floodplain than the existing built footprint, floodplain compensation will need to be provided on a volume-for-volume and level-for-level basis.

	
Surface and Groundwater	Area lies within Source Protection Zone 2 
Land Instability	An historic landfill lies adjacent to the north of area under Spitalfields Market. There is potential for stability issues however the area of the landfill is completely developed which suggests any issue can be addressed. Further investigation will be required at the planning application stage.
Sensitive Receptors (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Eaton park lies 10m south of the area and New Spitalfields Market lie 30m west of the area. Housing and allotments lie 70m north of the area but they are screened by railway lines.

Nature Conservation	No features identified
Green Belt and Open Space	Eaton Manor Metropolitan Open Land lies 10m south of the area which lies within the Lee Valley Regional Park.
Historic Environment	No features identified
Highways	There is concern that the vehicles which will transport waste would result in further congestion on the roads and increase pollution throughout the Borough.
Conclusion	
Potential Uses	Waste transfer, enclosed anaerobic Digestion, processing and recycling. Areas not within Flood Zone 3 are potentially suitable to handle hazardous waste.
Uses unlikely to be suitable	Integrated resource recovery facilities/resource parks, Thermal treatment, mechanical biological treatment, pyrolysis / gasification, indoor composting, outdoor composting and in-vessel composting.
General mitigation measures	There are amenity issues facing the area such as the proximity of Eaton Park, Spitalfields Market and residential properties, as such the area is not suitable for external facilities. Facilities should therefore be enclosed. As necessary an assessment of ecological value of the area should be included as part of a planning application. Key mitigation measures should include dust suppression and other measures such as wheel-washing, negative air pressure and rapid-closure doors. Mitigation measures along the boundary with the park should also include appropriate landscaping and/or planting and incorporate appropriate boundary treatments or park improvements to protect the recreational potential of the park. Parts of the area are at a medium or high risk of surface water flooding the completion of a Flood Risk Assessment and inclusion of SuDs or other appropriate techniques to manage surface water runoff will be key mitigation measure. Appropriate measures should also be incorporated to prevent any contamination of groundwater. As proposals may increase the level of traffic generated within the area an air quality impact assessment will be a key mitigation measure.

nlwp
north london waste plan

Sustainability Appraisal

January 2019

Proposed submission
North London Waste Plan

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Albanian ☐ Ky dokument është pjesë e Planit të Mbeturinave të Londrës Veriore. Në qoftë se ju duhet ndihmë me përkthimin, lutemi shënoni (tick) këtë kuti, shkruani emrin dhe adresën tuaj tek kutia në fund të këtij formulari dhe dërgojeni tek adresa e dhënë.

Arabic ☐ هذه الوثيقة هي جزء من وحدة نفايات شمال لندن. إن كنت بحاجة إلى ترجمة، ضع إشارة في الإطار المربع وأضف اسمك وعنوانك في الإطار المربع في أسفل هذه الاستمارة وأرسلها على العنوان المبين.

Bengali ☐ এই দলিলটি (ডকুমেন্ট) 'নর্থ লন্ডন ওয়েস্ট প্ল্যানে'এর একটি অংশ। উক্ত দলিলটির অনুবাদের জন্য যদি আপনার কোন সহায়তার দরকার হয়, তাহলে দয়া করে এই বাক্সটিতে টিক দিন, তারপর এই ফর্মের নিচের দিকে দেওয়া বাক্সে আপনার নাম ও ঠিকানা লিখে ফর্মটি প্রদত্ত ঠিকানায় ফেরত পাঠিয়ে দিন।

Chinese ☐ 本文件是北倫敦廢物規劃的一部分。如果您需要翻譯方面的幫助，請在上面的小方格裏打鈎號，並在本表格底部的方格裏填上您的名字和地址，把表格寄到指定地址。

French ☐ Ce document fait partie du Programme de Gestion des Déchets du Nord de Londres. Si vous avez besoin d'une traduction, vous êtes prié de cocher cette case, d'inscrire votre nom et adresse dans la case au bas de ce formulaire et de nous le retourner à l'adresse indiquée.

Greek ☐ Αυτο το εγγραφο είναι μέρος,
του Σχεδιου Αποβλητων του Βορειου Λονδινου στην εκθεση ζητηματων και επιλο–γων του σχεδιου. Αν χρειαζεστε βοηθεια με την μεταφραση του, παρακαλω βαλτε τικ σεαυτ ο το τετραγωνο, προσθεστε το ονομα και την διευθυνση σας στο κουτακι που βρισκεται στο κατω μερος αυτης της αιτησης και επιστρεψετε την στην διευθυνση που δινεται

Gujarati ☐ આ દસ્તાવેજ નોર્થ વેસ્ટ લંડન પ્લાનનો હિસ્સો છે. જો તમને તેના ભાષાંતરમાં સહાયતા જોઈતી હોય, તો કૃપા કરીને આ ખાનામાં ટિકની નિશાની કરો. આ ફોર્મમાં નીચે આપેલા ખાનામાં તમારું નામ અને સરનામું લખો અને તેમાં બતાવેલા સરનામે તે પાછું મોકલી આપો.

Punjabi ☐ ਇਹ ਦਸਤਾਵੇਜ਼ ਨੌਰਥ ਲੰਡਨ ਵੇਸਟ ਪਲੈਨ ਦਾ ਇਕ ਹਿੱਸਾ ਹੈ। ਜੇਕਰ ਤੁਹਾਨੂੰ ਇਸਦੇ ਅਨੁਵਾਦ ਵਾਸਤੇ ਮਦਦ ਦੀ ਲੋੜ ਹੈ ਤਾਂਕ੍ਰਿਪਾ ਕਰਕੇ ਇਸ ਖਾਨੇ ਨੂੰ ਟਿੱਕ ਕਰੋ, ਅਤੇ ਇਸ ਫ਼ਾਰਮ ਦੇ ਥੱਲੇ ਦਿੱਤੇ ਖਾਨੇ ਵਿਚ ਆਪਣਾ ਨਾਮ ਅਤੇ ਪਤਾ ਲਿਖੋ ਅਤੇ ਦਿੱਤੇ ਹੋਏ ਪਤੇ 'ਤੇ ਵਾਪਸ ਭੇਜ ਦਿਓ।

Polish ☐ Niniejszy dokument jest częścią raportu dotyczącego kwestii i możliwości Projektu Zagospodarowania Odpadów w Północnym Londynie (North London Waste Plan). Jeśli potrzebujesz pomocy w zakresie tłumaczenia, zaznacz powyższą kratkę, wpisz swoje imię, nazwisko i adres w puste pole w dolnej części formularza i odeślij pod wskazany adres.

Somali ☐ Warqaddani waxay qeyb ka tahay qorshaha qashinka ee woqooyiga London. Haddii aad u baahantahay taageero xaga tarjumaada ah, fadlan calaamadee sanduuqan, raaci magacaaga iyo cinwaankaaga sanduuqa ku yaal foomkan hoostiisa kuna soo celi cinwaanka ku qoran.

Spanish ☐ Este documento forma parte del plan de desechos del norte de Londres [*North London Waste Plan*]. En caso de requerir traducción, marque esta casilla y escriba su nombre y dirección en el recuadro que aparece en la parte inferior de este formulario y envíelo a la dirección que se indica.

Turkish ☐ Bu belge, Kuzey Londra Atık Planı'nın bir parçasıdır. Tercümeyle ilgili yardıma gereksinim duyarsanız, lütfen bu kutuyu işaretleyin ve bu formun sonundaki kutuya adınızı, soyadınızı ve adresinizi yazdıktan sonra belirtilen adrese gönderin.

☐ **Urdu**

یہ دستاویز نارتھ لندن ویسٹ پلان کا حصہ ہے۔ اگر آپ کو ٹرانسلیشن میں مدد کی ضرورت ہے تو مہربانی فرما کر اس خانے میں ٹک کریں، اور اس فارم کے نیچے خانے میں اپنا نام اور ایڈریس لکھیں اور دیئے گئے ایڈریس پر واپس بھیج دیں۔

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Name_____ Address_____ _____ _____	**Return to:** **Archie Onslow** **North London Waste Plan** **Regeneration & Planning** **Camden Town Hall** **Judd Street** **London WC1H 9JE**

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SUSTAINABILITY APPRAISAL OF THE DRAFT NORTH LONDON WASTE PLAN

1. INTRODUCTION

1.1 Sustainability Appraisal and Strategic Environmental Assessment

1.1.1 Section 19(5) of the Planning and Compulsory Purchase Act 2004 (PCPA) requires local planning authorities preparing a Development Plan Document to undertake a Sustainability Appraisal (SA) throughout its production in order to ensure that it is fully consistent with, and helps to implement, the principles of sustainable development. The purpose of this SA is to help ensure that Plans achieve an appropriate balance between environmental, economic and social objectives. It should help to identify the sustainability implications of different plan approaches and recommend ways to reduce any negative effects and to increase the positive outcomes. The SA thereby performs a key role in demonstrating to decision makers, and the public, that the Plan is the most appropriate given reasonable alternatives.

1.1.2 In parallel with this, the European Directive 2001/42/EC "*on the assessment of the effects of certain plans and programmes on the environment*" (the Strategic Environmental Assessment or 'SEA Directive') was transposed into United Kingdom law by the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations') and establishes the statutory obligation to undertake SEA with regard to any plan that:

- Is "prepared by an authority for adoption, through a legislative procedure by Parliament or Government, and is required by legislative, regulatory or administrative provisions" (Article 2(b)); and
- Concerns "town and country planning or land use… which sets the framework for future development consent of projects" (Article 5.2(a)).

1.1.3 The principal purpose of SEA is to ensure appropriate consideration is given to the likely significant environmental effects of the implementation of a plan. SA extends the scope of assessment so that environmental effects are considered in parallel with social and economic impacts so that the overall implications of the plan are subject to an integrated evaluation. Although SA and SEA are distinct processes, many of their requirements overlap and as a result the Government has issued guidance advising that an integrated approach to both assessments should be undertaken.

1.1.4 This Report outlines the findings of the SA of the draft North London Waste Plan (NLWP) and reasonable alternatives. The SA supports the Proposed Submission Plan (Regulation 19), following the consideration of responses received to the consultation on the draft NWLP (Regulation 18) which took place from 30th July to 30th September 2015. The consultation provided an opportunity for stakeholders and communities to comment on the draft plan and proposed policies.

1.1.5 This report meets the SEA requirements and acts as the 'environmental report' for the purposes of Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004. Throughout this report, all references to SA should be taken to also include the requirements of European Directive 2001/42/EC.

1.2 The North London Waste Plan

1.2.1 The seven North London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest are working together to produce the North London Waste Plan (the 'NLWP'). The NLWP covers part of the area of the London Legacy Development Corporation (LLDC), a Mayoral Development Corporation, which is the planning authority for a small part of Hackney and Waltham Forest.

1.2.2 The NLWP has two main purposes:

- to ensure there will be adequate provision of suitable land to accommodate waste management facilities of the right type, in the right place and at the right time up to 2035 to manage waste generated in North London; and
- to provide policies against which planning applications for waste development will be assessed, alongside other relevant planning policies/guidance.

1.2.3 The NLWP will cover all principal waste streams including:

- **Local Authority Collected Waste** (LACW): Previously known as municipal waste, LACW refers to all waste collected by a Local Authority, including household and trade waste;
- **Commercial and Industrial** (C&I): Wastes produced by businesses and industry;
- **Construction, Demolition & Excavation** (CD&E): Waste generated as a result of delivering infrastructure projects, building, renovation and the maintenance of structures;
- **Hazardous**: A sub category of all waste streams where the material produced is hazardous and requires specialist handling and treatment;
- **Agricultural waste**: Waste produced by farming and forestry activity;
- **Waste Water**: Waste produced from washing, cleaning and hygienic activities to create waste water and sewage effluents; and
- **Low level radioactive waste**: Waste associated with the undertaking of x-rays and laboratory testing using low level radioactive substances.

1.2.4 It is important to recognise that the NLWP will be strategic in nature and even the allocation of sites/areas should be regarded as a strategic undertaking given that the process omits consideration of some detailed issues in the knowledge that these will be addressed later (i.e. through the development management process). This strategic nature of the plan is reflected in the scope of the SA.

1.3 The SA Process

1.3.1 The process for undertaking SA/SEA is set out in detail in the National Planning Practice Guidance[1] and the document 'A Practical Guide to the Strategic Environmental Assessment Directive[2]. This guidance subdivides the SA/SEA process into a series of stages. While each stage consists of specific tasks, the intention should be that the process is undertaken in an iterative manner.

1.3.2 The stages involved in undertaking SA (incorporating SEA) are summarised in Table 1.

Table 1: SA Process

Stage A: Establishing the context and baseline conditions; defining the scope and framework for the assessment	
A1	Identify relevant plans, programmes and sustainability objectives that will influence the plan
A2	Collect relevant social, environmental and economic baseline information
A3	Identify key sustainability issues for the SA / plan to address
A4	Develop the SA Framework, consisting of the SA Objectives and sub-objectives
A5	Produce a scoping report and consult relevant authorities, the public and other key stakeholders on the scope of the appraisal
Stage B: Developing and refining alternatives and assessing the effects of the plan	
B1	Testing the plan objectives against the SA framework
B2	Developing the plan alternatives
B3	Predicting the effects of the plan
B4	Evaluating the effects of the plan
B5	Considering ways of mitigating adverse effects and maximising beneficial effects
B6	Proposing measures to monitor the significant effects of implementing the plan
Stage C: SA Report	
C1	Preparing the SA Report
Stage D: Consultation on the SA Report	
D1	Seek representations on the SA Report from consultation bodies and the public
Stage E: Post Adoption Reporting and Monitoring	
E1	Prepare and publish post-adoption statement
E2	Monitor significant effects of implementing the Plan
E3	Respond to adverse effects

1.3.3 Stage A of the process corresponds to the scoping stage of the SA and the findings of this stage are presented in the Scoping Report which was issued for a five-week period of consultation in June 2014 and subsequently updated to take account of the representations received. During this stage the scope of the SA was defined.

1.3.4 Stage B of the SA process is linked to the overall production of the NLWP which includes the development of plan options and the selection of the preferred options.

[1] CLG Planning Practice Guidance (2014)
[2] ODPM 'A Practical Guide to the Strategic Environmental Assessment Directive' (2005)

1.3.5 As part of the Stage C an interim SA Report was produced in July 2015, which provided a summary of the SA process undertaken and documents the findings of the SA of the draft North London Waste Plan (NLWP) and reasonable alternatives. It was used as a consultation document and issued to statutory bodies and stakeholders for comment alongside the draft NLWP document.

1.3.6 This version of the SA report has been prepared following consideration of responses received on the draft NLWP (Regulation 18) which took place from 30th July to 30th September 2015. The SA is being updated to reflect policy changes made to the NLWP. The report meets the SEA requirements and acts as the 'environmental report' for the purposes of Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004. As such, the intention of this SA Report is to adopt an approach to appraisal which also meets the requirements of the SEA Directive and Regulations. The following table shows how this report meets the requirements of the SEA Directive.

Table 2: Compliance with the SEA Directive

Information to be included in an Environmental Report under the SEA Regulations	Relevant sections in the SA Report
An outline of the contents, main objectives of the plan and its relationship with other relevant plans and programmes.	1.2 2.1
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.	2.2
The environmental characteristics of areas likely to be significantly affected.	2.2
Any existing environmental problems which are relevant to the plan, including in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	2.1 2.2 1.5
The environmental protection objectives, established at international, Community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation.	2.1 2.2
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soils, water, air, climatic factors, material assets, cultural heritage, landscape, and the interrelationship between the above factors.	Section 4 Appendix Report
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan.	4.5 Section 7 Appendix Report
An outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties.	3.4 Section 4
A description of measures envisaged concerning monitoring.	Section 5
A non-technical summary of the information provided above.	Separate Document

1.4 Feedback from Consultation

1.4.1 Regulation 12(5) of the SEA Regulations stipulates that when deciding on the scope and level of detail of the information that must be included in the Environmental Report, the responsible authority should undertake appropriate consultation.

1.4.2 Consequently, when preparing the SA Scoping Report for the NLWP and defining the framework for the assessment a draft Scoping Report was issued for a five-week period of consultation that ran from Tuesday 3rd June 2014 to Wednesday 9th July 2014. Comments were invited on the content of the draft Scoping Report and, in particular, whether it identified the key sustainability issues from the baseline information and if the proposed Sustainability Appraisal Framework was appropriate.

1.4.3 Each of the statutory consultation bodies identified by the SEA Regulations[3] was consulted on scope and level of detail contained within the Report. In addition, and in line with the NLWP Consultation Protocol and each Borough's adopted Statement of Community Involvement (SCI), wider consultation on the Scoping Report was also undertaken.

1.4.4 Comments were received on the draft Scoping Report from Natural England, the Environment Agency, North London Waste Authority, community groups and individuals. Some of the main comments received were the need to:

- Review additional relevant plans, policies and programmes to identify their implications for the NLWP;
- Incorporate additional baseline information relating to issues such as fly tipping and exempt facilities;
- Ensure that the identified sustainability issues acknowledge that location priorities for new facilities need to take account of proximity to waste sources, to disposal/re-use/recovery sites and to the location of markets for recovered or secondary materials;
- Make a number of minor amendments to one objective and to indicator information relating to health, green infrastructure, transport, landscape, flood risk, waste self-sufficiency and the economy.

1.4.5 The SA Scoping Report has been updated to address these comments. It is considered that the revised SA Scoping Report forms a fit for purpose framework for the appraisal of the NLWP and that this framework has been subject to the statutory requirements set out in Regulation 12 of the SEA Regulations.

1.4.6 Following on from the Regulation 18 SA, six two-part public consultation events were held from 2nd September to 11th September 2015 consisting of both facilitated afternoon workshops requiring registration and evening drop-in sessions. These took place in each

[3] The SEA Regulations require the Environment Agency, English Heritage, Natural England and the Countryside Agency to be consulted on the scope of sustainability appraisals. However, the Natural Environment and Rural Communities (NERC) Act merged the Countryside Agency and English Nature to form a new agency - Natural England.

North London Borough, with the exception of Islington which co-hosted a combined event in Camden close to the borough boundary. An additional meeting was scheduled in Hackney specifically concerning the suitability of the Theydon Road area identified in the previous consultation draft for the development of waste management facilities. The purpose of these events was to seek views from residents and interested parties on development management policies, sites and areas set out in the draft Plan.

1.5 Related Assessments

Habitat Regulations Assessment

1.5.1 Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna – the 'Habitats Directive' – provides legal protection for habitats and species of European importance. Article 6 of this Directive introduced the requirement to undertake a 'Habitat Regulation Assessment' (HRA) of the implications of proposed land use plans for the integrity of nature conservation sites of European importance. Such sites are known as Natura 2000 sites, and include Special Areas of Conservation (SACs), candidate Special Areas of Conservation (cSACs), Special Areas of Protection (SPAs), potential Special Areas of Protection (pSPAs), Ramsar sites and Offshore Marine Sites (OMSs).

1.5.2 The purpose of a HRA is to determine whether or not significant effects on European sites are likely and to suggest ways in which they could be avoided. Under the provisions of the Habitats Directive, such a plan can only be brought into effect, as a result of the HRA, it can be demonstrated that the integrity of the sites will not be adversely affected or, where adverse impacts are anticipated, there are shown to be no alternative solutions and imperative reasons of overriding public interest for the plan to go ahead.

1.5.3 The HRA of the NLWP is being prepared and will be reported separately. The main issues that are likely to be addressed by this assessment concern the implications of the spatial strategy and proposed allocations for the protection of internationally designated wildlife sites, either alone or in-combination with other plans or projects occurring within the Plan area and adjacent parts of Greater London.

2. THE CONTEXT FOR THE PLAN

2.1 Links to Other Plans, Programmes and Strategies

2.1.1 Stage A1 of the SA process involves establishing the context in which the NLWP is being prepared, namely the other policies, plans and programmes, and sustainability objectives that could influence its content and the opportunities and challenges they present. The SEA Directive specifically requires environmental objectives established at international, European Community or national levels to be taken into account in developing a Plan. However, in order to facilitate a comprehensive approach, guidance on SA recommends that this should be widened to consider how the Plan can support the full range of other plans, policies and programmes that already exist, including at the regional and local levels, taking into account their economic and social as well as environmental objectives.

2.1.2 The Scoping Report published a list of relevant plans, policies and programmes and contained a detailed assessment of these plans and the key messages and implications of them for the NLWP. This list is reproduced in Appendix 1 to this report.

2.1.3 A number of key messages emerged from this review of policies, plans and programmes. These are summarised in Table 3 below and are grouped under the topics listed in the SEA Directive.

Table 3: Key Messages from the Policies, Plans and Programmes Review

Key Messages	Policies, Plans and Programmes
Biodiversity, Flora and Fauna • Ensure biodiversity is considered in all areas of decision-making. • Maintain, protect, enhance and restore biodiversity and the natural environment. • Avoid harm to designated sites and protected species. • Ensure the importance of green infrastructure is recognised.	The Water Framework Directive (2000/60/EC), Thames river basin district river basin management plan: 2009, The Ramsar Convention, Birds Directive (2009/147/EC), Habitats Directive (97/62/EC), EU Biodiversity Strategy to 2020, Conservation of Habitats and Species Regulations (2010), Wildlife and Countryside Act (1981), Natural Environment and Rural Communities Act (2006), UK Biodiversity Action Plan, 1994 (reviewed 2007), Biodiversity 2020: a Strategy for England's Wildlife and Ecosystem Services (2011), The Natural Choice (2011), Protection of Badgers Act 1992, Hedgerow Regulations 1997, NPPF (updated July 2018), the London Plan (2016), Mayor London's Biodiversity Strategy, London Biodiversity Action Plan, Local Plan Core Strategies and Development Policies documents, local BAPs, London Environment Strategy (2018).
Population and Human Health • Ensure wider health issues are considered and safeguard the health of the community. • Protect and improve quality of life. • Maintain / improve access to open space for leisure and recreation. • Locate sites where the potential impact	The NPPF (updated July 2018), Healthy Lives, Healthy People: Our strategy for public health in England (2010), Local Plan Core Strategies and Development Policies documents, Sustainable Community Strategies, North Central London Sustainability and Transformation Plan (NCL STP)., London Environment Strategy (2018).

Key Messages	Policies, Plans and Programmes
on the health and well being of local communities is minimised. • Avoid adverse impacts on human health arising from the transport of wastes.	
Soil • Prioritise the use of previously developed land. • Avoid ground pollution and seek to reduce land contamination.	The Mining Waste Directive (2006/21/EC), Safeguarding Our Soils – A Strategy for England, NPPF (updated July 2018), the London Plan ((2016) Local Plan Core Strategies and Development Policies documents.
Water • Maintain and improve water quality. • Limit the impacts of waste management facilities on sensitive receptors such as water. • Use water resources efficiently and seek to minimise future demands. • Reduce the impact of flooding and avoid inappropriate development in areas of flood risk. • Avoid development that could increase flood risk. • Promote the management of surface water and reduction of flood risk using SuDS • Protect groundwater.	The Water Framework Directive (2000/60/EC), Directive 2006/118/EC on the protection of groundwater against pollution and deterioration, the IPPC Directive (2008/1/EC), NPPF (updated July 2018), , National Flood and Coastal Erosion Risk Management Strategy for England – Environment Agency (2011) , Water for People and the Environment; Water Resources Strategy for England and Wales (2009), London Plan ((2016), Securing London's Water Future: The Mayor's Water Strategy (2011), Thames Region Catchment Flood Management Plan (2009), Managing Flood Risk in the Lower Lee Catchment, Today and in the Future (2013), Groundwater protection: principles and practice (GP3) (2013) Local Plan Core Strategies and Development Policies documents.
Air • Limit the impacts of waste management facilities on sensitive receptors such as air. • Reduce the distance local wastes travel to be managed by providing more waste management capacity in the plan area. • Increase use of sustainable transport methods and reduce the need to travel.	The IPPC Directive (2008/1/EC), European Air Quality Directive (2008/50/EC), Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007), Air Pollution: Action in a Changing Climate (2010), NPPF (updated July 2018), the London Plan (2016), Clearing the Air: The Mayor's Air Quality Strategy (2010), Local Plan Core Strategies and Development Policies documents, Air Quality Actions Plans, London Environment Strategy (2018)
Climate • Reduce contributions to climate change. • Recognise the need to diversify energy supply and increase the proportion of energy that is generated from renewable sources. • Recognise that waste can be a potential source of low carbon energy. • Limit the potential impact of waste management developments on climate change.	Kyoto Protocol, NPPF (updated July 2018), Meeting the Energy Challenge: A White Paper on Energy (2007), Climate Change Act 2008, UK Climate Change Programme (2006), , Delivering London's Energy Future: The Mayor's Climate Change Mitigation and Energy Strategy (2011), the London Plan (2016)) which propose a carbon intensity floor for energy generating plant, Managing risks and increasing resilience: the Mayor's climate change adaptation strategy, Local Plan Core Strategies and Development Policies documents, London Environment Strategy (2018).
Transport • Reduce emissions from the transport of waste by all modes by seeking to manage more waste close to its source. • Reduce the risk that movement of waste will contribute to road congestion and safety or adversely affect road safety. • Promote sustainable transport of wastes	European Air Quality Directive (2008), Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007), Waste Management Plan for England (2011). National Planning Policy for Waste (and associated Planning Practice Guidance) (2014), Sustainable Communities Act (2007), Meeting the Energy Challenge (2007), The Climate Change Act (2008), The Future of

Key Messages	Policies, Plans and Programmes
encouraging use of rail and waterways.	Transport White Paper (2004), The London Plan (2016) , The Mayor's Waste Management Strategy (2011), North London Joint Waste Strategy (2008), The Mayor's Air Quality Strategy (2010), Borough Transport Strategies, London Environment Stratefy (2018).
Material Assets • Prevent/reduce waste and recognise waste as a resource. • Promote employment opportunities and seek to reduce deprivation.	The NPPF (updated July 2018), Local Plan Core Strategies and Development Policies documents, Sustainable Community Strategies.
Cultural Heritage • Protect the historic environment from inappropriate development.	Planning (Listed Buildings and Conservation Areas) Act (1990), Ancient Monuments and Archaeological Areas Act (1979), The Governments Statement on the Historic Environment for England (2010), National Heritage Protection Plan, NPPF (updated July 2018), London Plan (2016), Local Plan Core Strategies and Development Policies documents.
Landscape • Protect and enhance landscape character, improve local environmental quality and protect the environment. • Maintain access to the countryside. • Recognise the value of landscapes and townscapes.	European Landscape Convention (2000), Natural Environment and Rural Communities Act (2006), NPPF (updated July 2018), The Natural Choice (2011), London Plan (2016), Local Plan Core Strategies and Development Policies documents.
Waste • Provide facilities for the treatment of waste. • Recognise the need for sustainable waste management practices and, in particular, the need to reduce waste production. • Manage waste in accordance with the Waste Hierarchy. • Continue to reduce reliance on landfill. • Increase self-sufficiency in terms of dealing with waste.	The Waste Framework Directive (2008/98/EC), Landfill Directive (99/31/EC), Packaging Waste Directive (2005/20/EC), Incineration of Wastes Directive (2000/76/EC), WEEE Directive (2002/96/EC), Waste Management Plan for England (2013), Government Review of Waste Policy in England (2011), Waste (England and Wales) Regulations 2011, Landfill (England and Wales) Regulations 2002, Hazardous Waste Regulations 2005, Waste Incineration (England and Wales) Regulations 2002, Household Waste Recycling Act 2003, , Updated national waste planning policy, Industrial Emissions Directive 2011, London Plan (2016), London's Wasted Resource: The Mayor's Municipal Waste Management Strategy (2011), Making Business Sense of Waste: The Mayor's Business Waste Strategy for London (2011), North London Joint Waste Strategy (2009), Local Plan Core Strategies and Development Policies documents, London Environment Strategy (2018).

2.2 Overview of the Sustainability Baseline and Key Issues

2.2.1 An important step when establishing the appropriate scope of an SA involves reviewing baseline information on the current environmental, social and economic conditions in the Plan area. This helps to enable the identification of those key sustainability issues that the SA should consider and which the Plan can address. Baseline data also provides the information necessary to assist in predicting and monitoring the effects of a plan.

2.2.2 This part of Chapter 2 provides a summary of the current state of the environment, existing environmental problems and the environmental characteristics of the area. The full review of baseline information is provided in the SA Scoping Report which also indicates the sources of the statistics quoted in the section below.

Biodiversity

2.2.3 The North London area includes a number of international, national, and local features of biodiversity interest. Within the NLWP area there is one Ramsar site (Lea Valley) which is also classed as a European Special Protection Area (SPA), one Special Area of Conservation (SAC) (Epping Forest), six Sites of Special Scientific Interest (SSSI), 307 Sites of Importance for Nature Conservation (SINCs) and 21 Local Nature Reserves (LNR).

2.2.4 International and European Designated sites cover large areas in the north east of the North London Plan Area. Nationally and locally designated sites are located throughout the North London area but are mainly concentrated within the west of the area. Development must be sensitive to these sites and should support their enhancement where applicable and practicable.

Population

2.2.5 The North London area is one of the most densely populated areas in the UK. Recent statistics[4] show that the population has risen from 1.6 million in 2012 to more than 2 million in 2017.. This population growth will also increase the amount of waste North London will need to manage in the future, even though the amount of waste generated per person may not increase. The average age in North London is typically below the national average and this is particularly apparent in Islington, Hackney, Haringey and Waltham Forest which all have an average age below the Greater London average. Ethnic diversity is greater across the North London area than for England as a whole.

2.2.6 Hackney, Islington, Haringey, and Waltham Forest are all within the top 20 most deprived areas in the country. The indices of deprivation are based on income; employment; health and disability; education, skills and training; barriers to housing and services; living environment; and crime. Levels of deprivation are particularly acute in relation to barriers to housing and Hackney, Haringey and Waltham Forest are all in the top five most deprived local authorities in England in relation to this domain.

Health

2.2.7 People living in the London Boroughs of Barnet and Enfield have longer average life expectancies for males and females than the national average. All of the other Boroughs have shorter average life expectancies for males than the average for London and England. However, with the exception of Islington and Waltham Forest, five of the Boroughs have higher average life expectancies for females than the average for England. In general the statistics for people describing the state of their own health in the North London Boroughs

[4] Office for National Statistics (https://www.ons.gov.uk/)

are comparable with the London and national averages. However, within the inner London Boroughs a slightly greater proportion of people describe their health as 'Very Bad' when compared to national and London averages.

2.2.8 The method of waste processing, storage, transportation and disposal has the potential to impact human health through air, noise and water pollution in the same way as other commercial and industrial activities. However the risk of such impacts can be effectively minimised or eliminated using infrastructure or procedures imposed by planning conditions, environmental permitting and health and safety legislation.

2.2.9 As with other types of material transport, transportation of waste can pose health issues associated with noise and air pollution. The siting of new facilities will need to take into account the available transport links and the proximity of the facility to the source and eventual destination of the materials whether these are still wastes or secondary products. In the North London area, consideration should be given to the utilisation of sustainable transport networks i.e. the River Lee, the Regents Canal and several railway lines that cross the Plan area.

Soil

2.2.10 The land use within the plan area is primarily urban. However, small pockets of land within Enfield and Barnet have been classed by Natural England as either grade 3 or grade 4 quality agricultural land. This is not considered a particularly valuable agricultural resource but implies that waste management in the plan area must consider agricultural waste provisions.

Water Quality and Resources

2.2.11 The River Lee and Lee Navigation are the main rivers/canals within the plan area. There are several other tributaries in the area together with the Grand Union Canal. River quality within the plan area varies considerably but there are a number of water bodies which have been classified as 'poor' by the Environment Agency under the Water Framework Directive.

2.2.12 Per capita water consumption in the Thames region exceeds the national average and the region has one of the lowest average rainfalls in the UK. Groundwater is an important resource in London, accounting for 20% of its drinking water. The Environment Agency has identified several source protection zones within the plan area where specific pollution prevention mechanisms are in place and potentially polluting activities routinely monitored. There are increasing pressures on water resources from an expanding population, increased urbanisation and changing climate.

2.2.13 All of the London Boroughs have some susceptibility to flooding, particularly surface water flooding. Parts of the plan area are also susceptible to fluvial flooding which is greatest along the River Lee and its tributaries. This flood risk will have to be taken into account by the NLWP by preventing inappropriate development in areas at high risk of flooding and directing development away from areas at highest risk.

Air Quality

2.2.14 Air quality within the North London area is poor compared to average national levels and as a reflection the entire Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest have been declared as Air Quality Management Areas (AQMAs). These areas are designated due to high levels of nitrogen dioxide (NO2) and particulate matter (PM10) primarily derived from road vehicles.

2.2.15 The NLWP can make a contribution to reducing air quality problems by providing more capacity to manage locally arising wastes within the Plan area thereby reducing waste transport miles and delivering a corresponding reduction in waste-related transport air emissions impacting local air quality generated by the sector. The NLWP can provide a further contribution to reducing air quality problems by encouraging the transport of waste by alternative modes such as rail and canal where this is logistically feasible and economically viable.

2.2.16 The potential health impacts associated with air pollution, arising from siting waste management facilities close to residential and employment areas and other sensitive receptors needs careful evaluation. Appropriate controls administered through the planning and waste licensing processes should be used.

Climate Change

2.2.17 The North London area is likely to be susceptible to the effects of climate change. In particular this includes the effects of increased flooding along the River Lee Valley, decreased water reserves, and increased air pollution through dry sunny weather and increased temperatures due to the 'heat island' effect in the Inner London Boroughs. Climate change projections indicate that by the middle of the century, the average summer day in London is likely to be 2.7°C warmer than the baseline average. By 2050 the average summer is also expected to be 19% drier than the baseline average but the average winter could be 15% wetter.

2.2.18 With the exception of Camden, the Boroughs have lower CO_2 emissions per capita than the national average. The higher level of per capita emissions in Camden is largely a reflection of the comparatively high levels of emissions per capita from non-domestic buildings. In each of the Borough's the per capita CO_2 emissions from road transport is significantly less than the national average. This is particularly apparent in Camden, Hackney, Haringey, Islington and Waltham Forest. Per capita CO_2 emissions from the domestic sector are below the national average in six of the Boroughs but are marginally higher in Barnet.

2.2.19 The NLWP can contribute to climate change mitigation by pursuing and promoting measures such as sustainable transportation and sustainable construction techniques in new waste facilities. While it is recognised that waste management facilities will continue to generate CO_2 emissions, new waste facilities generating energy need to meet the Mayor's Carbon Intensity Floor.

Transport

2.2.20 North London has a well-developed network of roads and railways. Road congestion has however historically been a problem in parts of the plan area. The worst-affected areas are the southern parts of the area where the Congestion Charging Zone has been introduced to encourage a reduction in the number of journeys made by private car. Nevertheless, congestion in the main road network is an issue throughout the Plan area. Car ownership levels in the inner Boroughs are low compared to the national average but average in the outer Boroughs.

2.2.21 There are three main train lines running through the North London area which terminate in Euston, St Pancras, and Kings Cross, all of which are located within the London Borough of Camden. Together with the three main lines, London Overground national rail services also serve the area. North London is also well served by the London Underground and the Crossrail project will result in the creation of a new station within the south of the plan area. In addition, there are two main canals within the study area: the Regents Canal and the River Lee Navigation.

2.2.22 Transport for London is consulting on the route of Crossrail 2, a proposed new railway which would connect the national rail network in Surrey with Hertfordshire running through North London with a preliminary route released in 2015. In light of the 2015 route, some existing waste sites may be impacted, including but not limited to; Mobile Plant S R 008 No27 in Islington, O'Donovan Marketfield Road and Totenham Court Road, Western Road H W R C, all Haringey, Winters Haulage, Oakleigh Road South and G B N Services Ltd both in Barnet. Furthermore, proposed new areas might be affected, in parts of the Lee Valley in particular. Existing and proposed sites and areas may be affected by safeguarding for use as worksites or, due to proximity to a proposed station, come under pressure for redevelopment for other land uses such as housing. Crossrail 2 is expected to be operational by 2030 and route consultations will be ongoing. The impact of Crossrail 2 on the NLWP will be addressed under the monitoring arrangements.

2.2.23 The transportation of waste by road can contribute to congestion and also have secondary impacts on air quality. The distribution of facilities across North London will need to be considered and the NLWP should also aim to maximise the potential for some waste to be transported by alternative modes of travel, such as rail or canal.

Economy

2.2.24 The average gross weekly earnings within each of the North London Boroughs is higher than the average for England and all of the Boroughs have a higher proportion of their working population employed in the top three Standard Occupation Classifications than the national average. However the cost of living in the North London Boroughs is high; residential property prices are considerably higher than the national average and continue to rise at rates that exceed the average for England and Wales. One result of the above average property prices is the low home ownership rate in comparison to the national average. The inner London Boroughs also has a higher average house price than the London average.

2.2.25 With the exception of Barnet, all of the North London Boroughs have higher unemployment rates than the national average. This is particularly prevalent in Hackney, Haringey, Islington and Waltham Forest.

2.2.26 Waste management alone is not likely to play a major role in raising the economic profile of an area but with considered planning, it can contribute. Presence of a recycling or reprocessing facility can provide the impetus for others to invest in new local plant manufacturing products from secondary (reprocessed or recovered) materials generating jobs and wealth creation opportunities.

2.2.27 In particular, facilities can stimulate the local economy by creating markets and providing heat from the waste to the local community and local businesses. The provision of adequate facilities can also reduce the costs of managing waste by decreasing the need for waste to travel outside of the plan area for treatment / disposal.

2.2.28 Individual waste facilities typically employ relatively few staff; however a significant growth in infrastructure which enables the shift of waste treatment away from landfill, provides a potential benefit from cumulative growth in new jobs. In addition, although better technology means that there are likely to be fewer people directly employed within waste management facilities, other opportunities do exist, such as jobs associated with decentralised energy and the use of recycled products. Nevertheless, new facilities should be distributed across the North London area so that they are in close proximity to sources of waste though there may be good reasons to site them close to or alongside facilities reprocessing materials into secondary products as this can help to reduce the distance they travel, reducing potential air quality impacts and greenhouse gas generation.

Cultural Heritage

2.2.29 The North London area has over 14,000 listed buildings, 172 conservation areas, and 30 historic parks and gardens within the North London area. English Heritage identifies that over 140 of these listed buildings, 21 conservation areas and 3 historic parks and gardens are at risk of neglect and damage.

2.2.30 This wealth of heritage assets within the North London area could provide additional constraints on the location of new waste management facilities.

Landscape

2.2.31 There are no Areas of Outstanding Natural Beauty or other statutory landscape protection designations within North London. Practically all of the non-urban land in North London is designated as Green Belt excluding registered parks. The majority of the landscape of the area is defined by the Inner London Countryside Character Area.

2.2.32 Enfield has also identified Areas of Special Character where the Council will seek to preserve and enhance the essential character of the area, including landscape features such as woodlands, streams, designed parklands and enclosed farmland.

2.2.33 These designations can place substantial constraints on the type and scale of development that might occur outside of the urban area.

Waste Management

2.2.34 In order to assess North London's current facilities, capacity and arisings, and future waste management requirements, a Waste Data Study was prepared in July 2014 and updated in July 2015 to inform the Regulation 18 Draft NLWP. A further update in 2018 accompanies this Sustainability Appraisal and the Proposed Submission Plan, the results of which can be seen below.

2.2.35 The Waste Data Study identified that London as a whole produced approximately 22 million tonnes of waste in 2012. 17% (3.7 million tonnes) of this waste was Local Authority Collected Waste (LACW), 34% (7.5 million tonnes) was Commercial and Industrial (C&I) waste, 47% (10.4 million tonnes) was Construction, Demolition and Excavation (CD&E) waste. Overall 57% of waste produced in London is recycled.

2.2.36 Table 4 below shows the amount of waste generated in North London for the main waste streams using the latest data from 2018. Waste arisings vary from year to year and these figures represent a snapshot in time. Figure 1 shows the proportion of each waste stream as a percentage of the total waste in North London[5].

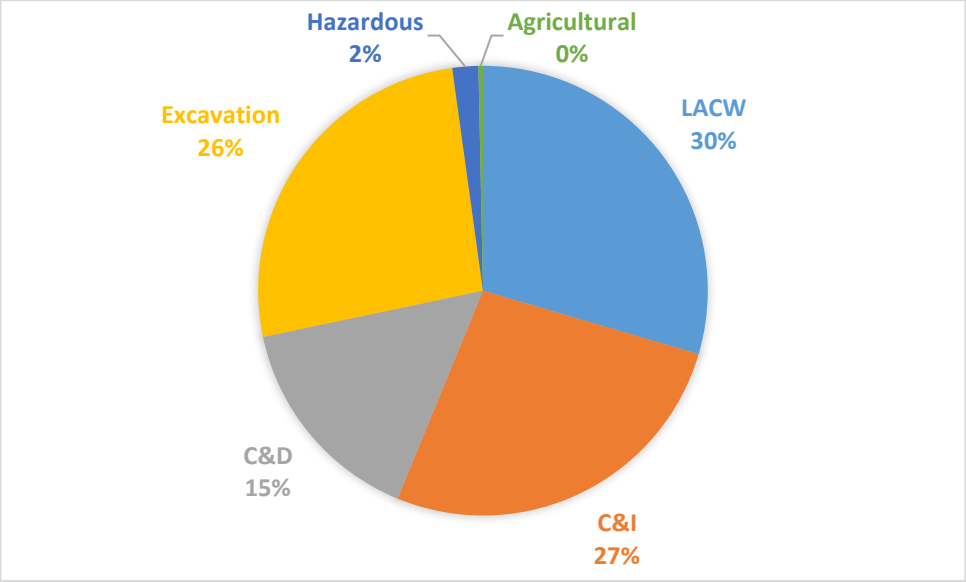
Table 4: Amount of Waste Generated in North London, 2018

Local Authority Collected Waste (LACW)	845,776
Commercial and Industrial Waste (C&I)	762,301
Construction and Demolition Waste (C&D)	443,180
Agricultural Waste	9,223
Hazardous waste	54,420
Excavation Waste	747,242
TOTAL	**2,861,062**

Source: North London Waste Data Study Update 2018

[5] The data is taken from the Waste Data Study (2016)

Figure 1 - Waste arisings in North London 2016



Source: North London Waste Data Study Update 2018

2.2.37 In North London, just over 850,000 tonnes of LACW was collected in 2016/17[6]. Of this, approximately 26% was recycled, reused or composted. Of the remaining LACW, 60% was sent to NLWA's energy-from-waste facility at Edmonton and 12% was sent to landfill outside of North London.

2.2.38 The Waste Data Study has used two methods to identify and project C&I waste. The first is to use data from the Defra C&I Waste Survey 2009 in line with the London Plan to assess the management routes of North London's C&I waste. The second is to use the new method for calculating C&I waste as introduced following the withdrawal of the Defra C&I surveys which uses published data from the EA's WDI. This new method of calculation indicates that 44% of C&I waste is recycled, reused or composted while 33% of this waste stream is sent to landfill and land recovery. A small proportion (6%) of C&I is sent for non thermal treatment with the remainder (17%) sent for thermal treatment with energy recovery. It should be noted that potential reliance on landfill will drop to 10% by 2030 in order to achieve EU statutory targets with recycling and reuse levels increasing to 65%.

2.2.39 Through the London Environment Strategy, the Mayor is seeking to make London a zero waste city with no biodegradable or recyclable waste sent to landfill by 2030 and by aiming to achieve 65% recycling from London's municipal waste, this will be achieved through a 50% recycling rate from LACW by 2025 (Policy 7.2.1) and 75% from business waste by 2030 (policy 7.2.2). The Mayor has also said that he does not want any new energy from waste capacity (policy 7.3.2.b). The Mayor has also indicated that he will use his powers to ensure there are sufficient sites to manage London's waste. The Environment Strategy embraces the ideals of the Circular Economy requiring manufacturers to design products to generate less waste and which can be easily repaired, reused and recycled, and the strategy encourages the development of business to facilitate this.

[6] Figures NLWA Annual Monitoring Report 2016-17

2.2.40 Local planning policies and development industry practice mean a lot of C&D material is managed on site and does not enter the waste stream. A total of 443,180 tonnes of C&D waste and 747,243 tonnes of excavation waste was produced in North London in 2016. The largest proportion of C&D waste arising in North London is managed via recycling (73%) and treatment (20%) facilities, with 7% sent directly to landfill. Recycling rates of C&D waste are high due to the nature and value of the material. Excavation materials are primarily disposed of directly to landfill (53%) with the remainder managed through transfer stations (28%) or sent for treatment (19%). The London Plan includes a target of 95% recycling of CD&E by 2020.

2.2.41 For hazardous a total of 53,421 tonnes was produced in 2016, of this waste 40% was managed at treatment facilities, of which the majority was exported for treatment outside of North London. The next most common method of management was recovery (20%), with a further 16% being managed at landfill. Of the total hazardous waste arisings, 653,240 tonnes (99.3%) was exported out of North London for management. It is not unusual for hazardous waste to travel outside the area to specialist facilities which tend to have a wider catchment area.

2.2.42 A total of 9,223 tonnes of Agricultural waste was produced in 2016, with only 125 tonnes being identified as being managed off site. The majority of agricultural waste arisings are managed within the limited number of farm holdings within the Plan area, with a very small amount managed offsite through commercial waste facilities. As such, the NLWP does not seek to identify sites for additional facilities to manage this waste stream; any facilities which do come forward on farm land would be considered against Policy 3 'Windfall sites'.

2.2.43 The very small amount of Low Level Non-Nuclear Radioactive Waste (LLW) arising in North London, mainly from hospitals, is currently managed outside of the area in specialist facilities. Records of LLW in the sub-region indicate that there are currently 16 sites producing LLW as waste water, with a number of the amounts generated being below the reporting threshold, which is measured in terms of radioactivity.

2.2.44 The main Thames Water sewage treatment facility in North London is Deephams Sewage Treatment Works (STW). This facility serves a Population Equivalent (PE) of 891,000 (as at 2011) and currently treats 209,000 tonnes of sewage that arrives at the works each day, although this can increase to over 1.3 million tonnes during heavy rainfall. Works are planned to upgrade Deephams STW. This proposed upgrade will increase the effluent treatment capacity of the STW so that it is able to serve a PE of 989,000 which will accommodate population growth up until at least 2032. Thames Water is also proposing an upgrade to the sewage sludge treatment stream at Deephams STW which will be sufficient to meet their needs during the plan period.

2.2.45 The current waste infrastructure in North London is dominated by transfer stations and treatment/recycling/composting facilities. However, the waste transfer facilities in North London are increasingly also sorting and recycling material. There are no disposal sites in the

plan area, only one incinerator with energy recovery and nine household waste recycling centres. Over one third of the waste facilities in North London are located in Enfield. Barnet, Haringey and Waltham Forest also have a reasonable number of sites, whereas Camden, Islington and Hackney have very few sites. The only waste management facilities in Camden and Islington are household waste recycling centres. This reflects the nature of boroughs which vary throughout North London with some boroughs better equipped to deliver suitable waste sites than others. The geography of North London influences the spread of waste sites.

2.2.46 The lack of disposal sites and the high number of transfer stations indicate that a significant proportion of North London's waste is being transferred out of the area for disposal. Although, as noted above, the waste transfer facilities in North London are increasingly also sorting and recycling material. Analysis of wastes movements also indicates a substantial quantity of waste arising in other parts of the capital passes through transfer stations in North London raising the quantity of waste that it appears to export.

Data Gaps

2.2.47 During the SA process several data gaps have been identified within the baseline assessment due to the lack of information of suitable quality. The majority of these data gaps relate to waste management information; however, there are also some data gaps within the environmental, social, and economic sections of the baseline report. Examples of specific gaps include:

- Information regarding the general health of the North London population and any at risk groups;
- Detail on the risk of sewer flooding in the North London area; and
- Detail on groundwater provision and the quality of this resource.

2.2.47 In relation to waste, there is more information available for certain waste streams than others. In particular, there is more up-to-date, reliable information available for LACW waste arisings in North London than there is for C&I, CD&E and agricultural waste.

2.2.48 Other specific data gaps include:

- Details of nuisance related to waste management activities across the seven Boroughs;
- Information regarding the amount of energy generated from thermal treatment of waste and information on what this energy is used for;
- Information on the sources of ground contamination;
- Information on the arisings of low-level radioactive waste in North London; and
- Information regarding the transportation of waste, including kilometres travelled and the modes of transport utilised in the North London area.

Future Changes without the Plan

2.2.49 The SEA Regulations not only require the relevant aspects of the current state of the environment to be reported but also state that consideration should be given to the likely evolution of these issues if the Plan is not implemented. The table below lists trends relating to the key sustainability issues in North London and identifies whether there is scope for the Plan to influence these trends.

Table 5: Summary of projected further changes

Projected Trend	Potential Influence of the Plan
Continuation of a fast growing population which is increasing above the national average	The implementation of the Plan is unlikely to affect this issue but any increase in the population is likely to result in an associated growth in waste.
Continuation of high population density	The implementation of the Plan is unlikely to affect this issue.
Five of the seven North London boroughs have shorter average life expectancies for males than the average for London and England. Both Islington and Waltham Forest also have lower average life expectancies for females than the national average.	Apply development management policies to ensure that new waste management development does not have an unacceptable impact on the health and amenity of nearby sensitive receptors.
Average gross weekly earnings are likely to remain above the national average but the high costs of living are likely to continue.	The implementation of the Plan is unlikely to have a significant effect on costs of living. Facilitate, as far as possible, new waste facilities to generate incremental employment gains.
Continuation of high levels of deprivation and unemployment in some areas, particularly in relation to barriers to housing.	Facilitate, as far as possible, new waste facilities to generate incremental employment gains recognising that these are likely to have a limited impact on overall levels of deprivation. The implementation of the Plan is unlikely to affect barriers to housing.
The North London area is likely to be susceptible to the effects of climate change. In particular this includes the effects of increased flooding, increased air pollution through dry sunny weather and increased temperatures.	Require new development to take this into account by, for example, incorporating high standards of insulation and natural ventilation and by reflecting flood risk issues and incorporating infrastructure such as SuDS to mitigate it.
Air quality is poor compared to national levels. The number of days on which recommended levels are exceeded is forecast to decrease but it is not certain that this is a long term trend.	Support improvements to air quality by seeking to bring sources of waste and management facilities as close together as feasible and promote alternative methods of transporting waste.
Continuation of need to reduce greenhouse gas	Support reductions in greenhouse gas emissions

Projected Trend	Potential Influence of the Plan
emissions.	by promoting recycling and the re-use of materials and by reducing 'waste miles' by supporting the provision of sufficient facilities within the Plan area to manage North London's waste.
There are a number of water bodies which have been classified as being 'poor' quality.	Require new development to take this into account by, for example, incorporating SuDS. This would also be covered by individual Borough's Local Plan Policies.
Per capita water consumption continues to exceed the national average.	Apply development management policies so that this issue is addressed for new applications by, for example, requiring new development to be water efficient unless this is already covered by individual borough's policies
Road congestion has historically been a problem in some areas and could continue to be an issue.	Define spatial strategy that brings sources of waste and management facilities as close together as feasible and promote alternative methods of transporting waste.
A significant proportion of North London's waste is being transported out of the area for disposal.	Support the delivery of suitable waste management sites that help achieve net self-sufficiency and reduce the amount of waste that is exported out of the Plan area.
Hazardous waste arisings have decreased significantly but CD&E waste arisings could continue to increase.	Support the delivery of suitable waste management sites that help achieve net self-sufficiency and to help move waste up the Waste Hierarchy.

3 THE SA FRAMEWORK AND METHODOLOGY

3.1 The SA Framework

3.1.1 SA is an objectives-based appraisal in which the potential impacts of a Plan are assessed in relation to a series of objectives that promote sustainable development. The establishment of these objectives is therefore central to the SA process as it provides the methodological yardstick against which the sustainability effects of the Plan can be described and evaluated.

3.1.2 The SA Objectives are established as part of Stage A of the SA process and reflect the key sustainability issues identified through the analysis of the evidence base set out in the SA Scoping Report. Drawing upon the sustainability issues identified through analysis of baseline data and the review of other relevant plans and strategies, the NLWP SA Scoping Report identifies fourteen SA objectives. Criteria for measuring progress against each Sustainability Objective were also developed to assist with the appraisal of the NLWP.

3.1.3 Table 6 identifies the SA Objectives for the NLWP. Each of the Objectives is supported by a series of subsidiary assessment criteria to add further clarity and to assist the assessment process.

Table 6: SA Objectives and Assessment Criteria

SA Objectives		Assessment Criteria
1	To protect people's health, communities and local environmental quality from the adverse effects of waste management.	• Will the plan/proposal have an adverse impact on levels of nuisance including dust, particulate emissions, noise (including traffic noise), vibration, visual amenity and light pollution? • Will it redress environmental inequalities within the plan area?
2	To maintain green infrastructure and open space.	• Will the plan/proposal support the creation of healthier lifestyles through, for example, the provision of new or improved open space? • Will it have an adverse impact on the green infrastructure network? • Will it lead to a loss of open space / reduction in public access?
3	To promote sustainable modes of transport, reduce the need to travel and improve choice and use of more sustainable transport modes.	• Will the plan/proposal reduce overall transport distances for waste? • Will it reduce waste-related car and lorry traffic and increase sustainable transport use? • Will it reduce/increase road congestion?
4	To conserve and enhance the historic environment, heritage assets and their settings.	• Will the plan/proposal have an adverse impact upon heritage assets and/or their setting?
5	To maintain and enhance the quality and character of North London's townscapes and landscapes.	• Will the plan/proposal have an adverse impact on local landscape character or on townscapes? • Will it have an adverse affect on the openness of the Green Belt? • Will it affect areas of public open space? • Will it lead to landscape/townscape improvements? • Will it result in development that is sympathetic to its surroundings?
6	To maintain, protect and enhance biodiversity, protected species, habitats, geodiversity and features of geological interest.	• Will the plan/proposal have an adverse impact upon protected sites or species? • Will it restore or create new habitat? • Will it lead to the loss of, or impact on the integrity of, BAP habitats or species?
7	To reduce and manage flood risk	• Will the plan/proposal help to avoid inappropriate development in areas at risk of flooding? • Will it exacerbate vulnerability to flooding? • Will the plan reduce flood risk through the use of SUDS? • Will the plan involve the reconfiguration of existing sites or development of a flood alleviation scheme?
8	To adapt to, and reduce the impacts of, climate change.	• Will the plan/proposal help to reduce vulnerability to the impacts of climate change?

SA Objectives		Assessment Criteria
9	To reduce contributions to climate change, promote energy efficiency and increase the use of energy from sustainable sources.	• Will the plan/proposal increase emissions of greenhouse gases from waste activities? • Will it reduce emissions of greenhouse gases? • Will it encourage the use and/or production of renewable energy? • Will it reduce waste-related car and lorry traffic and increase sustainable transport use?
10	To protect and improve air quality, water quality and soils.	• Will the plan/proposal have an adverse impact on air quality? • Will it reduce/increase road congestion? • Will the plan/proposal have an adverse impact on surface or ground water quality? • Will it improve existing water quality? • Will the plan/proposal support the remediation of contaminated land? • Will it have an adverse impact on soil quality?
11	To manage waste sustainably, maximise North London's self-sufficiency in the management of waste, minimise the production of waste and increase re-use, recycling and recovery rates.	• Will the plan/proposal minimise the production of waste? • Will it promote sustainable waste management and encourage movement of waste up the Waste Hierarchy?
12	To ensure the efficient use of land and natural resources and the sustainable management of existing resources.	• Will the plan/proposal make use of previous developed land or buildings? • Will it increase demand for water? • Will it incorporate/encourage measures to ensure water is used efficiently?
13	To encourage sustainable economic growth, exploit the growth potential of business sectors and improve the competitiveness and productivity of the local waste industry.	• Will the plan/proposal encourage sustainable economic growth through provision of adequate waste management facilities? • Will the plan/proposal diversify the economy in terms of the waste management sector? • Will it enable new and innovative waste management technologies to be developed and utilised? • Will it enable maximum value recovery from waste where possible? • Will it promote waste minimisation?
14	To reduce economic disparities, unemployment and deprivation.	• Will the plan/proposal support the creation of a broad range of jobs and employment opportunities?

3.2 Compatibility of SA and NLWP Objectives

3.2.1 The SA Objectives are distinct from the Strategic Objectives of the Plan which are focused on specific outcomes relating to the provision of waste management capacity whereas the SA Objectives cover the wider perspective required by SA with respect to the social, economic and environmental impacts of the Plan. The objectives for the draft NLWP are as follows:

Table 7: Strategic Objectives

Objective Number	Objective
1	To support the movement of north London's waste as far up the Waste Hierarchy as practicable, to ensure environmental and economic benefits are maximised by utilising waste as a resource.
2	To ensure there is sufficient suitable land available to meet North London's waste management needs and reduce the movements of waste through safeguarding existing sites and identifying locations for new waste facilities
3	To plan for net self-sufficiency[7] in LACW, C&I, C&D waste streams, including hazardous waste, by providing opportunities to manage as much as practicable of North London's waste within the Plan area taking into account the amounts of waste apportioned to the Boroughs in the London Plan, and the requirements of the North London Waste Authority.
4	To ensure that all waste developments accord to high standards of design and build quality, and that the construction and operation of waste management facilities do not cause unacceptable harm to the amenity of local residents or the environment.
5	To ensure the delivery of sustainable waste development within the plan area through the integration of social, environmental and economic considerations
6	To provide opportunities for North London to contribute to the development of low carbon economy and decentralised energy
7	To support the use of sustainable forms of transport and minimise the impacts of waste movements including on climate change
8	To protect, and where possible enhance, North London's natural environment, biodiversity, cultural and historic environment

3.2.2 A key initial stage of the assessment is to evaluate the extent to which the two sets of Objectives are aligned and to consider whether the objectives of the NLWP are consistent with the principles of sustainable development. This enables conflicts and tensions between the objectives to be identified and necessary additions or amendments to be made. The compatibility of the two sets of objectives is assessed in Table 8.

[7] Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste generated in North London, while recognising that some imports and exports will continue.

Table 8: Compatibility of the SA and NLWP Objectives

NLWP Objectives	SA Objectives													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
1			?						✓	?	✓	✓	✓	
2	?	?	✓	?	?	?	?	?	✓	✓		✓	✓	✓
3	?	?	✓	?	?	?	?	?	✓	✓		✓	✓	✓
4	✓			✓	✓	✓				✓				
5	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
6	?				?			✓	✓	?	✓	✓	✓	
7	✓		✓						✓	✓		✓		
8		✓		✓	✓	✓					?			

KEY

✓	Compatible	X	Incompatible	?	Unknown / unclear		No link

3.2.3 Table 8 highlights that the majority of the interactions identified between the objectives are positive and, as a result, most of the two sets of objectives are largely considered to be compatible with each other. There were no instances where it was considered that the objectives were potentially incompatible. Nevertheless, there are a number of instances where the relationship between the two sets of objectives is considered to be uncertain. For example, the NLWP objective of ensuring that there are sufficient suitable land available to meet North London's waste management needs would have an uncertain impact on a number of social and environmental SA objectives as it is not certain whether any of these sites may have an impact on, for example, the character of townscapes or green infrastructure. Nevertheless, it is acknowledged that the Plan and the Development Management process should ensure that any such adverse impact is avoided or mitigated. It is also recognised that not identifying sufficient land for waste management facilities also has the potential to have adverse social, environmental and economic implications.

3.3 Approach to the Assessment

3.3.1 The Spatial Strategy and all policies and area allocations in the NLWP have been assessed against the SA Framework. Regulation 12(2) of the SEA Regulations also requires the likely significant effects of implementing reasonable alternatives to be identified, described and evaluated. In accordance with this requirement, reasonable alternatives have also been considered against the SA Framework.

3.3.2 The appraisal process has considered the degree and type of impact on each of these objectives. This has been a qualitative assessment of whether or not the predicted effects on the objective are likely to be significant. A qualitative five point scale set out in Table 9 has been used as the basis for this assessment which ranks the effect from major positive to neutral through to major negative and degrees between. Where the effect is unclear or cannot be assessed a '?' has been used.

Table 9: Criteria for Assessing the Significance of Impacts

Score	Appraisal Category
+ +	Major Positive
+	Positive
0	Neutral
–	Negative
– –	Major Negative
?	Uncertain

3.3.3 The appraisal has also considered the likely timing of any impacts, split by short term (0-5 years), medium term (5-10 years), and long-term (10+ years – or likely to last over the whole of the Plan period). In addition, it has predicted the probability of the impact occurring (high, medium or low); the scale of impact; the permanence of the impact (temporary or permanent); any key secondary, cumulative and/or synergistic impacts; and options for mitigation.

3.3.4 The assessments have adhered to normal procedure for SA/SEA in evaluating the impact of the policy or site without mitigation. Taking mitigation into account at this stage would involve a presumption that appropriate measures will be used when this cannot be guaranteed at present.

3.3.5 Each assessment concludes with a summary section reviewing the overall findings and proposing mitigation measures.

3.4 Data Limitations / Technical Difficulties

3.4.1 The SEA Directive requires the identification of any difficulties encountered; these may include technical deficiencies or lack of knowledge.

3.4.2 Certain strategic policies in the draft NLWP have no spatial expression. As a result, during the appraisal of the draft NLWP, there were a number of instances where it was difficult to reach a judgement on the likely effect of a particular policy due to there being a lack of information on how and where actions would be carried out.

3.4.3 When assessing area allocations it was difficult to predict impacts on certain objectives as this will depend on the type of waste management facility that is delivered as, for example, the degree of impact on dust and traffic levels would depend on the type of facility. Similarly, the degree to which a facility will move management of material up the Waste Hierarchy would also vary depending on the type of facility. A number of the proposed area allocations are quite large. As a result, a common difficulty encountered was that it is difficult to predict the impact of directing waste management facilities to these locations without knowing

whereabouts in the area the development would take place. This was a particular issue when appraising areas which, for example, only adjoined residential properties on one boundary which made it difficult to predict whether waste management development would take place in close proximity to a sensitive receptor.

3.4.4 A number of data limitations were also encountered during the process. For instance, limited information is available on sewer and groundwater flooding. Consequently, when assessing areas against the objective that relates to reducing flood risk there was a need to focus on flooding from fluvial, tidal and surface water sources.

4. APPRAISAL OF THE DRAFT NLWP

4.1 Introduction

4.1.1 This section provides a summary of the results of the SA of the draft NLWP. The first part of this chapter provides an overview and assessment of the principal options that were evaluated as part of the preparation of the NLWP.

4.1.2 The second part of the chapter documents the results of the SA of the draft NLWP. It includes a summary of the appraisal of the Spatial Strategy, policies and area allocations contained within the plan against the fourteen sustainability objectives identified in the SA Scoping Report and their associated evaluation criteria. The full details of the assessments are provided in the accompanying Sustainability Appraisal Report Appendices.

4.2 Assessing Alternatives

4.2.2 Regulation 12(2) of the SEA Regulations requires the likely significant effects of implementing reasonable alternatives to be identified, described and evaluated. In accordance with this requirement, this section provides an overview of how reasonable alternatives have been considered during the SA Process.

Strategic Approach

4.2.3 A series of options were considered when determining the strategic approach that the NLWP would take to waste management in North London. These relate to how much waste will be generated over the plan period (growth assumptions), how much waste can be managed within North London (capacity strategy), and how this waste should be managed (management strategy). An Options Appraisal Report (2018) has been prepared which considered different scenarios around how much waste will be generated over the plan period (economic and population growth assumptions), how much waste can be managed within North London (capacity strategy, and how this waste should be managed (management strategy). The Options are set out in more detail in an Options Appraisal Report[8] and are assessed in relation to SA below.

Growth assumptions: How much waste will be generated in North London up to 2035?

4.2.4 The Waste Data Study[9] considered a number of population and economic growth scenarios to identify the likely future waste management requirements over the NLWP plan period to 2032. The modelling exercise looked at a range of different growth rates representing objectives set within Mayoral strategies, including the London Plan (March 2016), as well as those set nationally. The three growth scenarios represent different population and economic factors that will affect the quantity of waste generated from households, businesses and services. The following growth assumption options were considered:

- Option A: No Growth

[8] North London Waste Plan: Options Appraisal for the Draft Plan (2015)
[9] North London Waste Plan: Waste Data Study – Part 1: Waste Arisings in North London (2016)

- Option B: Growth
- Option C: Minimised Growth

4.2.5 All the evidence and projections anticipate substantial population and economic growth in London over the next few decades. As a result, planning for no growth (Option A) or minimised growth (Option C) were not considered to be appropriate strategies as they do not represent the most credible estimate of growth in North London over the plan period and would result in a risk of there being an under-provision of capacity for waste needs in North London over the next fifteen years. By contrast, Option B is closely aligned with the Greater London Authority's modelling which has been independently tested through the Local Plan Examination process. The SEA Regulations only require an assessment to be made of the environmental effects of implementing 'reasonable' alternatives. Consequently, given that Options A and C are not considered to be realistic, it is considered that they do not constitute reasonable alternatives for the purpose of the SEA Regulations.

Capacity options: how much of North London's waste can be managed within North London?

4.2.5 The NLWP is required to plan for seven waste streams, in accordance with EU and national policy: local authority collected waste (LACW); commercial and Industrial (C&I) waste; construction, demolition and excavation (CD&E) waste, low level radioactive waste, agricultural waste and excavation waste. In so doing, it must meet apportionment targets for LACW and C&I waste by 2026 as set out in the London Plan. In North London, just over 850,000 tonnes of LACW was collected in 2016/17[10]. Of this, approximately 26% was recycled, reused or composted. Of the remaining LACW, 60% was sent to NLWA's energy-from-waste facility at Edmonton and 12% was sent to landfill outside of North London. Recycling rates of 32% are lower than the national average of 44% but higher than the national average of 30%. As noted in the Waste Data Study, low level radioactive waste and agricultural waste do not require additional facilities during the plan period and Thames Water anticipates that the upgrade to its existing Deephams facility will be sufficient to manage wastewater effluent during the plan period. It is also anticipated that further upgrades can be contained within the Deephams site. This leaves LACW, C&I and CD&E waste streams to plan for in the NLWP. Hazardous waste is a sub category of all waste streams, and is also considered in the NLWP. The following capacity strategy options were considered when preparing the draft NLWP:

1. Meeting the London Plan apportionment (managing approximately 85% of LACW and C&I waste generated in North London)
2. Net self-sufficiency[11] for LACW and C&I waste streams (managing the equivalent of 100% of LACW and C&I waste generated in North London)
3. Net self-sufficiency for LACW, C&I and CD&E waste streams (managing the equivalent of 100% of LACW, C&I and C&D waste generated in North London)
4. Complete self-sufficiency (managing every tonne of locally created waste within North London).

[10] Figures NLWA Annual Monitoring Report 2016-17

[11] Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste generated in North London, whilst recognising that some imports and exports will continue.

4.2.6 The draft NLWP has been based on Option 3 as this is considered to be the most appropriate capacity strategy. Options 1 and 2 are not considered to be appropriate strategies and the NLWP would not be in compliance with EU and national policy on planning for all main waste streams. Options 1 and 2 would also result in the NLWP not planning to meet as much of its waste as possible and would therefore increase reliance on facilities outside of the Plan area which could draw objections from neighbouring authorities who have highlighted a need for London boroughs to reduce exports. By contrast, Option 3 would demonstrate to neighbouring authorities outside London that North London intends to manage as much of its own waste as possible and reduce exports. There are also concerns that Option 4 is undeliverable given that the achievement of complete self-sufficiency is unlikely to be achieved due to physical constraints, the requirement to meet specialised waste management needs and the workings of the waste industry which mean that the patterns of management and movement of C&I and CD&E wastes are subject to commercial decisions and contracts over which local waste planning authorities have no direct control. Each of the options have however been appraised. A summary of the conclusions of the appraisal of the options is provided in Table 10. Full details of the assessment are provided in Appendix 1.

Table 10: Summary of the Appraisal of the Capacity Strategy Options

Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Option 1	–	?	+	?	?	?	?	?	+	?	+	+	+	+
Option 2	–	?	+	?	?	?	?	?	+	?	+	+	+	+
Option 3	–	?	++	?	?	?	?	?	++	+	++	+	+	+
Option 4	–	?	++	?	?	?	?	?	++	+	++	+	+	+

4.2.7 As Table 10 demonstrates, although each of the capacity strategy options has the potential to have a positive impact on a number of sustainability objectives, there are a number of instances where Options 3 and 4 could have a more significant positive impact on the objectives. In particular, by providing enough waste management capacity to manage at least the equivalent of the waste generated in North London, Options 3 and 4 have the potential to have a more significant positive impact on the objectives that relate to maximising self-sufficiency in the management of waste, reducing contributions to climate change and reducing the need to travel. Options 3 and 4 could also have a positive impact on the objective of protecting and improving air, water and soil quality. All four of the options would however have a positive impact on the objectives that relate to ensuring the efficient use of natural resources, encouraging sustainable economic growth and reducing unemployment.

4.2.8 However, without the implementation of appropriate mitigation measures, each option has the potential to have some negative impact on the objective that relates to amenity as, due the nature of the urban area in North London, each option is likely to result in waste management facilities being directed to locations that are in proximity to sensitive receptors. Each option would have an uncertain impact on the remaining objectives.

Management options: how waste will be managed in North London

4.2.9 The North London Boroughs have statutory duties to meet targets and the NLWP will need to be ambitious in order to achieve European Union, national, regional and local targets. In developing the draft NLWP the following three potential recycling / recovery options were considered:

I. Baseline (current levels of recycling/recovery)
II. Maximised recycling
III. Maximised recovery / median recycling

4.2.10 The draft NLWP has been based on Option II as it is considered that this approach aligns with European, national, regional and local targets. It also means that more waste will be managed further up the Waste Hierarchy and is more consistent with the aims of the NLWP. By contrast, it was considered that Option I would not provide the necessary impetus for change needed to reduce landfill, increase recycling and manage waste higher up the hierarchy. Option III was discounted as it would not meet the Mayor's timescales for recycling. Both Options I and III were also considered to not be in line with EU, national, regional and local targets on recycling within the 2020 timeframe. Each of the management strategy options have however been appraised. A summary of the conclusions of the appraisal of the options is provided in Table 11. Full details of the assessment are provided in Appendix 1.

Table 11: Summary of the Appraisal of the Management Strategy Options

Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Option I	–	?	–	?	?	?	?	?	–	–	?	?	?	0
Option II	–	?	+	?	?	?	?	?	++	+	++	++	++	+
Option III	–	?	+	?	?	?	?	?	++	+	+	+	+	+

4.2.11 As Table 11 demonstrates, although each of the management strategy options would have an uncertain impact on the majority of the sustainability objectives, there are clear differences in the performance of the options in some aspects of the SA process. In particular, Options II and III have the potential to have a positive impact on the greatest number of objectives. Specifically, Option II could have a major positive effect on the objectives that relate to managing waste sustainably, improving the productivity of the waste industry, ensuring the efficient use of resources and reducing contributions to climate change. Option III could also have a positive impact on each of these objectives and both options could also have some positive impact on the objectives that relate to minimising the need to travel and reducing economic disparities. By contrast Option I would have a negative, uncertain or neutral impact on each of these objectives.

4.2.12 However, without the implementation of appropriate mitigation measures, each option has the potential to have a negative impact on the objective that relates to amenity as, due the nature of the urban area in North London, each option is likely to result in waste management facilities being directed to locations that are in proximity to sensitive receptors. Each option would have an uncertain impact on the remaining objectives.

Sites and Areas

4.2.13 An extensive site search and selection process was undertaken as part of the preparation of the plan. This included a survey of existing waste sites, call for sites exercises and a desk based land availability search using GIS.

4.2.14 Following the compilation of this process, a long list of sites was produced. This list of sites was subsequently refined by assessing each of the sites against a series of criteria which were split into two levels: absolute criteria and screening criteria.

4.2.15 The aim of using the criteria was to apply a level of judgement to the process to ensure that those sites/areas which are wholly unsuitable are excluded from further consideration and to identify those which may be suitable. Accordingly, those sites which were affected by absolute criteria, such as those that were within sites of international or national importance for nature conservation or which contain Scheduled Ancient Monuments and grade I or grade II* Listed Buildings, were excluded from the process. The screening criteria were then applied to all land left after this process. The aim of using the screening criteria was to apply a level of judgement to ensure that those sites/areas which are wholly unsuitable are excluded from further consideration and to identify those which may be suitable.

4.2.16 Given that these sites are considered to be unacceptable for waste management development, they are not considered to constitute reasonable alternatives within the context of the SEA Regulations. As such, these discounted sites have not been assessed in this report.

4.2.17 The revised list was subsequently refined by eliminating sites which were not considered to be realistic or deliverable because they had an application for another use coming forward, or where the landowner had indicated that the site was not available for waste management development unless the site already has permission for a waste use. These discounted sites are also not considered to be reasonable alternatives for the purpose of SEA Regulations and are not assessed in this report.

4.2.18 The remaining areas have all been proposed for allocation and have therefore been assessed as part of the appraisal of the draft NLWP. A summary of the appraisal of these sites and areas is provided in Section 4.3 below and the full appraisals are contained within Appendices 4.

4.2.19 In preparing this (Proposed Submission) version of the NLWP, and deciding which sites and areas to take forward, the North London Boroughs took into account national and regional policy, the aims of the NLWP and consultation responses on the Draft Plan, including issues raised around deliverability and other constraints. Further work was undertaken to gather and assess additional information on the proposed sites and areas received during the consultation or as a result of new data being published. The North London Boroughs developed a range of reasonable options for taking forward sites and areas in the Proposed Submission version of the plan. The preferred option was to take forward land designated as industrial land and high-performing (Band B) sites/areas, while achieving a better

geographical spread by reducing the number of sites identified in Enfield. This focus on industrial land and the highest performing areas helps to locate waste facilities away from residential properties, as far as this is possible in an urban area like North London. Further details are set out in Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP (2018).

4.3 *Assessing the Draft NLWP*

Spatial Framework

4.3.1 The Spatial Framework sets out the physical distribution of key characteristics, including infrastructure, geographical features and planning designations, which will influence the Plan and identifies opportunities and constraints within that framework. A summary of the conclusions of the appraisal of the Spatial Framework contained within the draft NLWP is provided in Table 12. Full details of the assessment are provided in Appendix 2.

Table 12: Summary of the Appraisal of the Spatial Framework

Policy	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Spatial Strategy	+	+	+	+	+	+	+	+	+	+	++	+	+	+

4.3.2 As Table 12 demonstrates, the Spatial Framework has the potential to have a positive impact on a wide range of objectives. In particular, by supporting the provision of a network of waste sites across North London it could have a major positive impact on the objective of managing waste sustainably and some positive effect on the objectives that relate to encouraging sustainable economic growth and reducing economic disparities.

4.3.3 The Spatial Framework seeks to protect amenity by directing waste management development to the most suitable sites/areas taking into account environmental and physical constraints. As a result, the Strategy also has the potential to have a positive impact on the objectives that relate to health and amenity; green infrastructure; heritage; landscapes and townscapes; biodiversity; flood risk; adapting to climate change; and protecting air, water and soil quality.

4.3.4 One of the key principles of the Spatial Framework is to direct waste management facilities to locations where there are potential opportunities to better utilise sustainable modes of transport such as rail and waterways. It also seeks to secure a wider distribution of waste facilities, reduce waste exports and increase the amount of waste managed in proximity to its source, which could help minimise the distance that waste needs to be transported in order to be managed. The strategy could therefore have a positive impact on the objective that relates to sustainable transport and reducing the need to travel. This element of the Spatial Strategy, together with the promotion of opportunities for decentralised heat and energy networks, should also ensure that the Strategy has a positive effect on the objective of reducing climate change contributions.

Policies

4.3.5 The draft NLWP contains a series of policies against which planning applications for waste development will be determined. These policies provide the mechanism through which the aims and objectives, waste management strategy and spatial strategy will be delivered. A summary of the conclusions of the appraisal of the policies contained within the draft NLWP is provided in Tables 13 and 14. Full details of the assessment are provided in Appendix 3.

Table 13: Summary of the Appraisal of the Policies

Policy	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
1. Existing Waste Management Sites	?	0	+	0	0	0	0	0	+	0	+	+	+	0
2. Locations for new waste management facilities	+	+	+	+	+	+	+	+	+	+	++	++	+	+
3. Windfall Sites	+	+	+	+	+	+	+	+	+	+	++	+	+	+
4. Re-use & Recycling Centres	0	0	+	0	0	0	0	0	+	0	++	++	+	0
5. Assessment Criteria for waste management facilities and related development	+	+	+	+	+	+	+	+	+	+	0	?	0	+
6. Energy recovery & decentralised energy	0	0	0	0	0	0	0	0	++	-	+	++	+	0
7. Waste Water Treatment Works and Sewage Plant	?	?	0	+	?	+	0	0	+	0	+	+	+	0
8. Control of inert waste	?	0	-	+	+	+	0	0	+	?	+	+	+	0

4.3.6 As Table 13 demonstrates, the policies within the draft NLWP would largely have a positive impact on the sustainability objectives. In particular, many of the policies would have a major positive effect on the objective of managing waste sustainability, maximising self-sufficiency in the management of waste, minimising the production of waste and increasing re-use, recycling and recovery rates. Policies , 2, 4 and 6 could also have a major positive impact on the objective that relates to ensuring the efficient use of land and resources.

4.3.7 Policies 2, 3, 5, 7 and 8 include measures to ensure that new waste management facilities do not have an unacceptable impact on a wide range of social and environmental considerations. As a result, these policies could support a particularly wide range of objectives, including those which relate to protecting health and amenity; maintaining green infrastructure; conserving the historic environment; protecting biodiversity; maintaining townscapes and landscapes and reducing flood risk. By supporting the creation of new employment opportunities, policies 2 and 3 could also have a positive impact on the objective of reducing unemployment and deprivation.

4.3.8 There are a number of instances where the impact of a policy on particular objectives is uncertain. For instance, the impact of Policy 1 on the objective that relates to health and amenity is uncertain as it may result in the safeguarding of existing sites which already have some adverse impact on amenity..

4.3.9 Depending on the nature of the facility proposed, energy recovery can lead to emissions which impact on air quality. As a result, Policy 6 has the potential to have a negative impact

on the objective that relates to protecting air quality. Nevertheless, it is acknowledged that other policies in the Plan and stringent emission standards should mean that the incorporation of measures to minimise greenhouse gas emissions and maximise the use of lower-carbon energy sources / generation does not have unacceptable impact on air quality.

Table 14: Conclusions from the Appraisal of the Policies

1. Existing Waste Management Sites By helping to ensure that there are sufficient waste management facilities to manage North London's waste, the policy has the potential to have a positive impact on the objective of managing waste sustainability, maximising self-sufficiency in the management of waste, minimising the production of waste and increasing re-use, recycling and recovery rates. It is however recognised that the policy may safeguard sites which accommodate facilities that do not manage waste at the optimal level in the Waste Hierarchy. The policy also has the potential to have a positive effect on the objectives that relate to sustainable transport and mitigating climate change by reducing the need for waste to be transported outside of the Plan area. However, there is a low level of certainty of this impact as the source of waste arisings is unknown and may originate from outside the plan area. The policy could also have a positive effect on the objective of ensuring the efficient use of land and the sustainable use of existing resources by reducing the likelihood of new sites needing to be identified to manage North London's waste. It is unlikely to have a negative impact on any of the objectives but the impact on the objective that relates to health and amenity is uncertain as the policy may result in the safeguarding of existing sites which already have some adverse impact on amenity. It is however recognised that in such instances it may be the nature of the facility rather than the site itself which is causing amenity problems. In addition, the release of these sites may cause capacity management problems for the plan area. As such, no mitigation measures are suggested to address this.
2.. Locations for new waste management facilities The policy has the potential to have a positive impact on a wide range of objectives. In particular, by requiring waste management development in these areas to result in the highest practicable level of recycling and recovery of materials, the policy has the potential to have a major positive effect on the objectives that relate to managing waste sustainably and ensuring the efficient and sustainable use of resources. By specifying that applications for waste management development in these areas will be required to be in line with the aims and policies of the NLWP, the London Plan and relevant Local Plan Policies, the policy should also support the objectives that relate to protecting health and amenity; maintaining green infrastructure; conserving the historic environment; maintaining landscapes and townscapes; protecting biodiversity; reducing flood risk; adapting to climate change; and protecting air, water and soil quality. The development and operation of waste management facilities in the identified areas would create employment opportunities which could therefore also have a positive effect on the objective of reducing unemployment and economic disparities. In addition, by reducing the need for waste to be transported outside of the plan area and by providing scope for the co-location of waste management facilities in close proximity to one another, the policy has the potential to reduce waste miles and have a positive impact on the objective that relates to reducing the need to travel. It is envisaged that the policy would not have an uncertain or negative impact on any of the objectives.
3. Windfall Sites This policy provides a series of criteria for assessing applications for waste management

development on sites/areas that have not been identified for this use by the NLWP. It therefore provides a mechanism to help ensure that there are sufficient sites to manage waste within North London and states that these proposals will need to fit within the spatial strategy and contribute to the delivery of the NLWP aims and objectives. Moving waste up the Waste Hierarchy is a key aspect of the NLWP spatial strategy, aims and objectives. As a result, the policy has the potential to have a major positive impact on the objective that relates to managing waste sustainably. The requirement for waste management facilities on unallocated sites to fit within the spatial strategy and be in a location consistent with the site assessment criteria should also ensure that the policy supports the objectives that relate to protecting health and amenity; maintaining green infrastructure; sustainable transport; conserving built heritage; maintaining landscape and townscape character; protecting biodiversity; reducing flood risk; and adapting to climate change.

The policy also has the potential to have a positive effect on the economic objectives that relate to encouraging sustainable economic growth and reducing unemployment. It also provides flexibility in supporting development at locations which may become more suitable for waste use in the future provided other criteria preventing adverse impacts can be satisfied. The policy would not have a negative or uncertain impact on any of the objectives.

4. Re-use & Recycling Centres

This policy promotes the provision of re-use and recycling centres across the Plan area. By seeking to improve the coverage of these facilities the policy has the potential to improve recycling and recovery rates. It could therefore have a major positive effect on the objectives that relate to sustainable waste management and the efficient use of existing resources. Other objectives that the policy has the potential to have a positive impact on are those which relate to reducing unemployment; encouraging sustainable economic growth; mitigating climate change; and reducing the need to travel.

5. Assessment Criteria for waste management facilities and related development

The policy contains a range of criteria for assessing proposals for waste management facilities and related development. The policy will help minimise the impact of waste management development in North London and will help ensure that it does not result in unacceptable social or environmental impacts. As a result, the policy could support a wide range of objectives, including those which relate to protecting health and amenity; maintaining green infrastructure; sustainable transport; conserving the historic environment; protecting biodiversity; maintaining townscapes and landscapes; reducing flood risk; reducing contributions to climate change; ; and protecting air, water and soil quality and reduction of unemployment and deprivation. The policy does not specifically promote development on previously developed land in preference to greenfield sites. As a result, the extent to which it would impact on the objective that relates to the efficient use of land is uncertain. Consideration should therefore be given to the inclusion of a criteria which gives preference to the use of previously developed land when assessing applications for waste management facilities.

6. Energy Recovery & Decentralised Energy

The policy promotes measures to minimise greenhouse gas emissions and to minimise the use of non-renewable energy and requires waste developments to maximise the use of lower-carbon energy sources/generation. As a result, the policy has the potential to have a significant positive impact on the objective or reducing climate change contributions, promoting energy efficiency and increasing the use of energy from sustainable sources. In addition, by supporting efforts to reduce the consumption of resources for energy generation, the policy could also have a major positive effect on the objective that relates to the efficient and sustainable use of natural resources.

The policy could also have a positive impact on the objectives that relate to encouraging sustainable economic growth, value recovery, and managing waste sustainably, although the level

of certainty that the policy would have a positive impact on the latter objective is not high as the policy promotes the management of waste by recovery which is not as high up the Waste Hierarchy as reusing or recycling.

Depending on the nature of the facility proposed, energy recovery can lead to emissions which impact on air quality. As a result, the policy does have the potential to have a negative impact on the objective that relates to protecting air quality. Nevertheless, it is acknowledged that other policies in the Plan and stringent emission standards should mean that the incorporation of measures to minimise greenhouse gas emissions and maximise the use of lower-carbon energy sources / generation does not have unacceptable impact on air quality.

7. Waste Water Treatment Works and Sewage Plant

This policy outlines the requirements for the provision of new facilities for the management, treatment and disposal of wastewater and sewage sludge. It emphasises that existing waste facilities, such as Deephams, are favoured and the relevant plans and standards should be adhered to.

By encouraging the use of existing facilities, the policy has the potential to have a positive impact on the objective of managing waste sustainably and maximising self-sufficiency in the management of waste. Moreover, it is expected that with the planned Thames Tideway Tunnel, pressure for further expansion of local Waste Water Treatment Works will be relieved. The policy also has the potential to have a positive effect on the objectives that relate to sustainable transport and mitigating climate change by reducing the need for waste to be transported outside of the Plan area. However, there is a low level of certainty of this impact as the source of waste arisings is unknown and may originate from outside the plan area. The policy could also have a positive effect on the objective of ensuring the efficient use of land and the sustainable use of existing resources by reducing the likelihood of new sites needing to be identified to manage North London's waste.

It is unlikely to have a negative impact on any of the objectives, but the impact on the objective relating to health and amenity is uncertain as the policy may result in the safeguarding of existing sites which already have some adverse impact on amenity. It is however recognised that in such instances it may be the nature of the facility rather than the site itself which is causing amenity problems. In addition, the release of these sites may cause capacity management problems for the plan area. As such, no mitigation measures are suggested to address this.

8. Control of inert waste

This policy outlines the criteria for proposals using inert waste. Where such criteria are met, all proposals should be compatible with the surrounding environment and include high quality restoration and aftercare of the site. In this there will be wider opportunities for enhancing the overall quality of the environment, including biodiversity enhancement, geological conservation and increased public accessibility.

There are benefits of using inert waste for restoration projects rather than disposing of at inert landfill sites. Moreover, increased use of recycled and secondary aggregates can reduce the need and demand for primary aggregates extraction. It is noted, however, that there may be disturbances to the local community and environment through the movement of HGVs. In such cases, proposals should incorporate wider benefits for the wider area, for example, through environmental improvement or the creation of new public rights of way.

Strategy Policy

4.3.10 The policy outlines a long term strategy for managing 100% of waste arisings within the plan area by identifying land with capacity for waste facilities, facilitating the movement of waste up the waste hierarchy and co-operation with waste receiving authorities until 2035. A summary of the conclusions of the appraisal of the Strategy Policy contained within the draft NLWP is provided in Table 15. Full details of the assessment are provided in Appendix 4.

Table 15: Summary of the Appraisal of the Strategy Policy

Policy	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Strategy Policy	+	-	?	?	?	?	?	0	0	-	++	-	+	+

4.3.11 As Table 15 demonstrates, the Spatial Strategy has the potential to have a positive impact on a some of objectives. In particular, it could have a major positive impact on the objective of managing waste sustainably by an increase in re-use, recycling and recovering waste across new and existing sites. It also directly promotes the movement of waste up the Waste Hierarchy.

4.3.12 One of the key principles of the Spatial Strategy is to direct waste management facilities to locations in close proximity to its source, which could help minimise the distance that waste needs to be transported in order to be managed. This could therefore have a positive impact on the objective that relates to reducing the need to travel. The Strategy Policy also seeks to develop new and existing sites could provide opportunities to encourage local economic growth and enable innovation.

4.3.13 The Strategy Policy seeks to direct waste management development to the existing and new sites taking into account environmental and physical constraints. As a result, the Strategy may have the potential to have a positive impact on the objectives that relate to health and amenity; green infrastructure; heritage; landscapes and townscapes; biodiversity; flood risk; adapting to climate change; and protecting air, water and soil quality. However the impact will need to be assessed on a site by site basis against each of these objectives and without this information the overall impact is unknown.

Area Allocations

4.3.15 Policy 2 of the draft NLWP identifies a series of areas that are suitable for waste management development. Each of these areas has been appraised individually. A summary of the conclusions of the appraisal of these areas is provided in Tables 16 and 17. Full details of the assessment are provided in Appendix 5.

Table 16: Summary of the Appraisal of the Area Allocations

Area Ref.	Area Name	SA Objective													
		1	2	3	4	5	6	7	8	9	10	11	12	13	14
A02-BA	Oakleigh Road	–	–	?	0	?	?	+	–	?	?	+	+	+	?
A03-BA	Brunswick Industrial Park	–	0	?	0	0	?	?	?	?	–	+	+	+	?
A04-BA	Mill Hill Industrial Estate	–	0	?	0	0	?	?	?	?	?	+	+	+	?
A05-BA	Connaught Business	–	0	?	0	0	–	- -	- -	?	–	+	+	+	?
A12-EN	Eley's Estate	?	0	?	0	0	–	- -	- -	+	–	+	+	+	?
A15-HC	Millfields LSIS	–	0	?	–	0	?	+	0	?	–	+	+	+	?
A19-HR	Brentwood Road	?	0	?	0	0	?	–	–	+	–	+	+	+	?
A21-HR	North East Tottenham	?	0	?	0	0	–	–	–	+	–	+	+	+	?
A22-HR	Friern Barnet/Pinkham	–	–	?	0	–	–	?	–	?	+	+	?	+	+
A24-WF	Argall Avenue	–	0	?	0	0	–	- -	- -	+	–	+	+	+	?
LLDC1-HC	Bartrip Street LSIS	–	0	?	–	0	?	–	–	+	–	+	+	+	?
LLDC2-HC	Palace Close SIL	–	0	?	–	0	?	–	–	+	?	+	+	+	?
LLDC3-WF	Temple Mill Lane	–	0	?	0	0	?	- -	- -	?	?	+	+	+	?

4.3.15 As Table 16 demonstrates, each of the proposed area allocations could have a positive impact on a number of objectives. In particular, each of the allocations would support the objective of managing waste sustainably, maximising self-sufficiency in the management of waste, minimising the production of waste and increasing re-use, recycling and recovery rates. The degree of impact on this objective would however depend on the nature of the waste management facility. The overwhelming majority of the proposed allocations would also have a positive effect on the objectives that relates to encouraging sustainable economic growth and ensuring the efficient use of land and resources. A significant proportion of the allocations are also considered to have the potential to have a positive impact on the objective of reducing contributions to climate change.

4.3.16 Very few of the proposed allocations have the potential to have a significant impact on the objective of conserving the historic environment. In addition, as many of the proposed allocations are existing industrial estates, directing waste management development to these locations is unlikely to have a significant impact on the quality and character of landscapes and townscapes.

4.3.17 The majority of the proposed allocations do however have the potential to have some negative impact on the objective that relates to health and amenity due to their proximity to sensitive receptors. Several of the allocations are also at risk of flooding. In particular, areas A05-BA, A12-EN and A24-WF are wholly or partially at a high risk of flooding. As such, directing waste management development to these locations has the potential to have a particularly significant negative impact on the objectives of reducing flood risk and adapting to climate change. A significant number of the allocations are also considered to have the potential to have some negative effect on the objective of protecting and improving air, water and soil quality.

Table 17 Conclusions from the Appraisal of Area Allocations

A02-BA: Oakleigh Road
The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help

move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It would also result in development being directed to areas at a low risk of flooding and could therefore have a positive impact on the objective of reducing flood risk.

The proximity to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. Depending on which part of the area is developed, directing waste management development to this location could result in the loss of green infrastructure features and have a negative effect on the objectives that relate to green infrastructure and adapting to climate change. Incorporating appropriate boundary treatments / landscaping are likely to be important mitigation measures. The proposed allocation would have an uncertain impact on the objectives that relate to sustainable transport, townscape character, flood risk, climate change, reducing unemployment and protecting air, water and soil quality.

A03-BA: Brunswick Industrial Park

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources.

The proximity to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility could help mitigate impacts. The proposed allocation would have an uncertain impact on the objectives that relate to sustainable transport, biodiversity, flood risk, climate change and unemployment.

A04-BA: Mill Hill Industrial Estate

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources.

The proximity to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. The proposed allocation would have an uncertain impact on several objectives, including those which relate to sustainable transport, biodiversity, flood risk, climate change, unemployment and protecting air, water and soil quality.

A05-BA: Connaught Business Centre

The proposed allocation has the potential to have a positive impact on a number of sustainability

objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources.

The proximity to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. Due to the proximity of the area to a designated SINC, the proposed allocation could have a negative effect on the objective of protecting biodiversity. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are likely to be important mitigation measures. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility could help mitigate impacts. In addition, as parts of the area are at a medium/high risk of flooding, the proposed allocation would also have a significant negative impact on the objectives that relate to reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures.

The proposed allocation could also have an uncertain impact on the objectives relating to sustainable transport and reducing contributions to climate change.

A12-EN: Eley's Estate

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact on the objective of reducing contributions to climate change.

Due to the proximity of the area to a designated SINC, the proposed allocation could have a negative effect on the objective of protecting biodiversity. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are likely to be important mitigation measures. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. In addition, as parts of the area are at a medium/high risk of flooding, the proposed allocation would also have a significant negative impact on the objectives that relate to reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures.

The proposed allocation could also have an uncertain impact on the objective relating to sustainable transport. Although parts of the area are in close proximity to sensitive receptors, the impact of the allocation on the objective that relates to health and amenity is considered to be uncertain as given

the size of the area, waste management development could potentially take place in a part of the area that is a significant distance from these residential properties which could avoid impact on amenity.

HAC07: Millfields LSIS

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. In addition, the proposed allocation also has the potential to have a positive impact on the objective of reducing flood risk as it would result in development being directed to an area that is at a low risk of flooding.

The proximity of the area to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. Due to the proximity of the area to designated heritage assets, waste management development in this location also has the potential to have a negative effect on the objective of conserving the historic environment. A key mitigation measure will be to ensure that appropriate heritage impact assessments are undertaken and that the design of any built facility is sympathetic to the setting of these heritage assets.

The proposed allocation could also have an uncertain impact on the objectives relating to sustainable transport, biodiversity, reducing contributions to climate change and reducing unemployment.

A19-HR: Brantwood Road

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact on the objective of reducing contributions to climate change.

The proposed allocation could have a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility, but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. In addition, as parts of the area are at a medium risk of flooding, the proposed allocation would also have a negative impact on the objectives that relate to reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures.

The proposed allocation could also have an uncertain impact on the objectives relating to sustainable

transport, biodiversity and unemployment. In addition, although parts of the area are in close proximity to sensitive receptors, the impact of the allocation on the objective that relates to health and amenity is considered to be uncertain as given the size of the area, waste management development could potentially take place in a part of the area that is a significant distance from these residential properties which could avoid impact on amenity.

A21-HR: North East Tottenham

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact on the objective of reducing contributions to climate change.

Due to the proximity of the area to a designated SINC, the proposed allocation could have a negative effect on the objective of protecting biodiversity. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are likely to be important mitigation measures. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility, but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. In addition, as parts of the area are at a medium risk of flooding, the proposed allocation would also have a negative impact on the objectives that relate to reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures.

The proposed allocation could also have an uncertain impact on the objective relating to sustainable transport. Although parts of the area are in close proximity to sensitive receptors, the impact of the allocation on the objective that relates to health and amenity is considered to be uncertain as given the size of the area, waste management development could potentially take place in a part of the area that is a significant distance from these residential properties which could avoid impact on amenity.

A22-HR: Friern Barnet/Pinkham Way

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. The site is designated as a Local Employment Area and as such, the development of a waste management facility in this location would encourage local economic growth and could also support the creation of additional employment opportunities. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and reducing unemployment. In addition, as the redevelopment of the site may present opportunities to remediate land contamination, the proposed allocation also has the potential to have a positive impact on the objective that relates to protecting air, water and soil quality.

The proximity to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate

controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. The area, although it previously accommodated a sewage treatment works, has been significantly revegetated, contains a number of mature trees and is designated as a SINC. As a result, its redevelopment has the potential to have some negative impact on the objectives that relate to biodiversity, green infrastructure, townscape character and adapting to climate change. Incorporating appropriate boundary treatments / landscaping, protecting existing green infrastructure features, undertaking appropriate ecological surveys and creating replacement habitat are likely to be important mitigation measures.

The proposed allocation would have an uncertain impact on the objectives that relate to sustainable transport, flood risk, reducing contributions to climate change and ensuring the efficient use of land and natural resources.

A24-WF: Argall Avenue

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact on the objective of reducing contributions to climate change.

The proximity to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. Due to the proximity of the area to a designated SINC, the proposed allocation could have a negative effect on the objective of protecting biodiversity. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are likely to be important mitigation measures. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. In addition, as parts of the area are at a medium/high risk of flooding, the proposed allocation would also have a significant negative impact on the objectives that relate to reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures.

The proposed allocation could also have an uncertain impact on the objective relating to sustainable transport.

LLDC1-HC: Bartrip Street LSIS

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact on the objective of reducing contributions to climate change.

The proximity of the area to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. Due to the proximity of the area to designated heritage assets, waste management development in this location has the potential to have a negative effect on the objective of conserving the historic environment. A key mitigation measure will be to ensure that appropriate heritage impact assessments are undertaken and that the design of any built facility is sympathetic to the setting of these heritage assets. Other objectives that the proposed allocation has the potential to have a negative impact on include those which relate to flood risk, adapting to climate change and protecting air, water and soil quality. The completion of a suitable Flood Risk Assessment, application of the Sequential Test, the incorporation of SuDS or other techniques to manage surface water runoff and the use of measures such as negative air pressure and rapid-closure doors will be key mitigation measures.

The proposed allocation would have an uncertain impact on the objectives that relate to sustainable transport, biodiversity and unemployment.

LLDC2-HC: Palace Close SIL

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact on the objective of reducing contributions to climate change.

The proximity of the area to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. Due to the proximity of the area to designated heritage assets, waste management development in this location has the potential to have a negative effect on the objective of conserving the historic environment. A key mitigation measure will be to ensure that appropriate heritage impact assessments are undertaken and that the design of any built facility is sympathetic to the setting of these heritage assets. Other objectives that the proposed allocation has the potential to have a negative impact on include those which relate to flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures.

The proposed allocation would have an uncertain impact on the objectives that relate to sustainable transport, biodiversity, unemployment and protecting air, water and soil quality.

LLDC3-HC: Bus Depot, Temple Mill Lane

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and

ensuring the efficient use of land and resources.

The proximity to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. In addition, as parts of the area are at a medium/high risk of flooding, the proposed allocation would also have a significant negative impact on the objectives that relate to reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures.

The proposed allocation could also have an uncertain impact on the objectives relating to sustainable transport, biodiversity, reducing contributions to climate change and protecting air, water and soil quality.

4.4 Secondary, Cumulative and Synergistic Effects

4.4.1 Under the provisions of the SEA Directive, when appraising the sustainability of a Plan it is necessary to consider whether or not there are any secondary, cumulative and/or synergistic effects. A number of these effects have been identified during the appraisal of the NLWP and are identified in the Appendices document which accompanies this report. Many of these effects are secondary. For example:

- Certain sites and areas were identified as having the potential to receive waste by sustainable modes of transport which could reduce road transport and have positive secondary impacts on congestion, air quality and greenhouse gas emissions from the transport sector;
- Many of the policies and sites/areas in the draft NLWP would encourage higher rates of reuse, recycling and recovery which would have a positive secondary impact of reducing the need to identify sites for landfill (either within or outside of the Plan area); and
- Certain proposed allocations have the potential to have an impact on townscape character which would have secondary impacts on perceptions of the area.

4.4.2 There were also several instances where potential cumulative impacts were identified. In particular, it was recognised that directing waste management uses to existing industrial estates could result in some cumulative impacts with surrounding employment uses, particularly in relation to traffic, dust, noise, etc.

4.5 Mitigation Proposals

4.5.1 Whilst carrying out the SA of the draft NLWP a number of mitigation proposals and suggested changes to the Plan have been identified which address issues that have come to light. These are documented in the accompanying Appendices Report and a summary of the key mitigation measures are summarised in Table 18 below.

4.5.2 These suggested mitigation measures should be considered when preparing the Regulation 22 NLWP submission and should be considered alongside all comments received during the Regulation 19 consultation which this SA supports. None of the proposed changes seek to significantly alter the purpose of Plan and many relate to measures that can be taken during the implementation of the plan to mitigate or avoid unacceptable impacts.

Table 18: Mitigation Proposals

Policy	Mitigation/Change Proposed	Affects
Policy 5: Assessment Criteria for Waste Management Facilities and Related Development	Consider amending the policy to make reference to avoiding adverse impacts on the integrity of SSSI and SINCs.	Policy
Policy 5: Assessment Criteria for Waste Management Facilities and Related Development	Consider amending the policy to prioritise the use of previously developed land in preference to greenfield sites	Policy
Policy 65: Assessment Criteria for Waste Management Facilities and Related Development	Consider amending the policy wording to require the fullest *practicable* contribution to climate change mitigation.	Policy
Areas	Allocate site for enclosed waste uses only and enforce appropriate controls through planning conditions and environmental permitting.	Several Areas
Areas	Ensure the appropriate application of the Sequential Test.	Several Areas
Areas	Ensure appropriate heritage impact assessments are undertaken and that the design of any built facility is sympathetic to the setting of these heritage assets.	Several Areas

5. MONITORING

5.1 The Localism Act has removed section 35(1) of the Planning and Compulsory Purchase Act 2004 which required local planning authorities to produce an Annual Monitoring Report for submission to the Secretary of State. There is still however a requirement for planning authorities to prepare reports containing information as to the extent to which the policies set out in their Local Plans are being achieved. The National Planning Policy for Waste also identifies the need to monitor and report on the take-up of allocated sites and areas; changes in the available waste management capacity as a result of closures and new permissions; and the quantities of controlled wastes i.e. LACW, C&I, CDEW being created locally and how they are being managed.

5.2 The sustainability effects of implementing the NLWP should also be monitored on an annual basis and reported through each Borough's monitoring reports. At this stage in the SA process there is only a need to present 'a description of the measures envisaged concerning monitoring'. An initial range of criteria for monitoring the sustainability effects of implementing the NLWP was proposed in the SA Scoping Report. These potential monitoring criteria are presented in Table 19 below.

Table 19: Monitoring Indicators

SA Objective	Decision-Making Criteria	Indicators
1. To protect people's health, communities and local environmental quality from the adverse effects of waste management.	Will the plan/proposal have an adverse impact on levels of nuisance including dust, particulate emissions, noise (including traffic noise), vibration, visual amenity and light pollution? Will it redress environmental inequalities within the plan area?	Number of substantiated complaints to North London Borough's relating to waste development nuisances (noise, dust, light, vermin and odour). Number of fly tipping incidents in the Plan area.
2. To maintain green infrastructure and open space	Will the plan/proposal support the creation of healthier lifestyles through, for example, the provision of new or improved open space? Will it have an adverse impact on the green infrastructure network? Will it lead to a loss of open space / reduction in public access?	Net area of open space and green space permanently lost/created in North London as a result of new waste management facilities.

SA Objective	Decision-Making Criteria	Indicators
3. To promote sustainable modes of transport, reduce the need to travel and improve choice and use of more sustainable transport modes.	Will the plan/proposal reduce overall transport distances for waste? Will it reduce waste-related car and lorry traffic and increase sustainable transport use? Will it reduce/increase road congestion?	Number of permitted sites that use alternative means of transport other than road. Amount of waste transported by rail/water. Waste exported, imported and dealt with within Plan area. Percentage of waste transported by road, rail and water Tonne miles of waste that are transported by road, rail and water
4. To conserve and enhance the historic environment, heritage assets and their settings.	Will the plan/proposal have an adverse impact upon heritage assets and/or their setting?	Number of designated heritage assets (including conservation areas, listed buildings, SAMs and registered parks and gardens) adversely affected by waste development.
5. To maintain and enhance the quality and character of North London's townscapes and landscapes.	Will the plan/proposal have an adverse impact on local landscape character or on townscapes? Will it have an adverse affect on the openness of the Green Belt? Will it affect areas of public open space? Will it lead to landscape/townscape improvements? Will it result in development that is sympathetic to its surroundings?	Number of permitted sites judged to have an adverse impact on local landscape character/conservation areas. Number of permitted sites resulting in the redevelopment of a vacant or derelict site. Area of Green Belt lost to waste development. Area of open space lost to waste development.
6. To maintain, protect and enhance biodiversity, protected species, habitats, geodiversity and features of geological interest.	Will the plan/proposal have an adverse impact upon protected sites or species? Will it restore or create new habitat? Will it lead to the loss of, or impact on the integrity of, BAP habitats or species?	Number, total area and condition of internationally and nationally designated sites (SSSIs, SPAs, SACs, Ramsar) and those of local importance (SINCs, LNRs). Area of new habitat created through waste planning applications/restoration

SA Objective	Decision-Making Criteria	Indicators
		schemes. Change in priority habitats and population of local Biodiversity Action Plan (BAP) species. Area of UKBAP and LBAP habitats created as part of waste development.
7. To reduce and manage flood risk	Will the plan/proposal help to avoid inappropriate development in areas at risk of flooding? Will it exacerbate vulnerability to flooding? Will the plan reduce flood risk through the use of SUDS? Will the plan involve the reconfiguration of existing sites or development of a flood alleviation scheme?	Number of waste facilities development within EA Flood Zones 2 and 3 and within Critical Drainage Areas/Local Flood Risk Zones. Number of sites permitted against Environment Agency flood advice. Number of schemes incorporating Sustainable Drainage Schemes (SuDS).
8. To adapt to, and reduce the impacts of, climate change.	Will the plan/proposal help to reduce vulnerability to the impacts of climate change?	Number of permitted sites that include climate adaptation measures (e.g. to cope with heat, flood, storms)
9. To reduce contributions to climate change, promote energy efficiency and increase the use of energy from sustainable sources.	Will the plan/proposal increase emissions of greenhouse gases from waste activities? Will it reduce emissions of greenhouse gases? Will it encourage the use and/or production of renewable energy? Will it reduce waste-related car and lorry traffic and increase sustainable transport use?	Number of facilities generating energy from waste. Average distance travelled by LACW for treatment/disposal. Number of permitted sites that include renewable energy generation technologies. The number and capacity of Combined Heat and Power (CHP) facilities.
10. To protect and improve air quality, water quality and soils.	Will the plan/proposal have an adverse impact on air quality? Will it reduce/increase road congestion? Will the plan/proposal have an adverse impact on surface or ground water quality?	Location and area of Air Quality Management Areas. Number of days when air pollution is moderate or higher. Number of days when the air quality threshold value of PM_{10} is exceeded.

SA Objective	Decision-Making Criteria	Indicators
	Will it improve existing water quality? Will the plan/proposal support the remediation of contaminated land? Will it have an adverse impact on soil quality?	Quality of local watercourses. Number of sites permitted within groundwater protection zones. Number and area of contaminated sites remediated as a consequence of waste-related development Number of sites permitted in areas of worsening air quality
11. To manage waste sustainably, maximise North London's self-sufficiency in the management of waste, minimise the production of waste and increase re-use, recycling and recovery rates.	Will the plan/proposal minimise the production of waste? Will it promote sustainable waste management and encourage movement of waste up the Waste Hierarchy?	Annual waste arisings by type. Estimated permitted treatment and disposal capacity in North London. The quantity of new capacity added at each level of the Waste Hierarchy Average distance travelled by LACW for treatment/disposal. Waste dealt with within the Plan area Volume and % of waste disposed to landfill by waste stream.
12. To ensure the efficient use of land and natural resources and the sustainable management of existing resources.	Will the plan/proposal make use of previous developed land or buildings? Will it increase demand for water? Will it incorporate/encourage measures to ensure water is used efficiently?	Proportion of new waste development on previously developed land. Proportion of existing and new waste developments with water efficiency measures.
13. To encourage sustainable economic growth, exploit the growth potential of business sectors and improve the competitiveness and productivity of the local waste industry	Will the plan/proposal encourage sustainable economic growth through provision of adequate waste management facilities? Will the plan/proposal diversify the economy in terms of the waste management sector?	Economic output of Gross Value Added (GVA) per capita per annum Number of new jobs created by new waste sites. Annual waste arisings by type.

SA Objective	Decision-Making Criteria	Indicators
	Will it enable new and innovative waste management technologies to be developed and utilised? Will it enable maximum value recovery from waste where possible? Will it promote waste minimisation?	Capacity of new waste management facilities by type. Number of businesses and new facilities introducing new waste management technologies at the top of the Waste Hierarchy e.g. Anaerobic Digestion with energy/heat generation.
14.To reduce economic disparities, unemployment and deprivation	Will the plan/proposal support the creation of a broad range of jobs and employment opportunities?	Number of new jobs created by new waste sites or by growth of existing ones.

5.3 In addition to monitoring the implementation of the NLWP, it is also proposed that the Waste Data Study (the comparison of available capacity with current and future waste management needs) that informs the Plan should be updated at two year intervals as a further systematic check on progress.

5.4 Responsibility for monitoring will lie with the individual Boroughs and this will provide a basis for the:

- Identification of unforeseen adverse effects and any necessary remedial action;
- Assessment of whether the Strategy is achieving the SA objectives; and
- Assessment of the performance of mitigation measures.

6. NEXT STEPS

6.1 This section of the report explains the next steps that will be taken as part of the preparation and SA of the NLWP.

6.2 Following consideration and analysis of the consultation responses received on the Regulation 19 draft plan, a 'Submission' version of the Plan will be produced and 'published' in-line with Regulation 22 of the Town and Country Planning (Local Planning) Regulations 2012. This will be 'Submitted' for Examination . Once the plan is submitted an independent Planning Inspector will be appointed by the Government to examine whether the NLWP meets the required legal and soundness tests, including duty to co-operate and procedural requirements. Assuming that the Inspector does not request that further work be undertaken in order to achieve soundness, it is expected that the Plan will be formally adopted in Summer 2020. At the time of adoption an SA 'Statement' must be published. This Statement will set out:

- How environmental considerations have been integrated into the plan;
- How the environmental report has been taken into account;
- How opinions expressed in response to consultations have been taken into account;
- The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives considered; and
- The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan.

6.3 Comments can be submitted using the following methods:

By email: feedback@nlwp.net (preferred method)

By post: Archie Onslow
North London Waste Plan
Regeneration and Planning
Camden Town Hall
Judd Street
WC1H 9JE

7. DIFFERENCE THAT THE PROCESS HAS MADE

7.1.1 SA provides an iterative process for checking that an emerging Plan is sustainable as envisaged by government guidance and legislation, and in the context of the key local sustainability issues identified at the outset of the process.

7.1.2 This SA has provided an appraisal of a number of alternative options in relation to the strategic approach of the NLWP and has also provided an assessment of the proposed policies and allocations in the draft version of the Plan. Although the SA process concludes that the draft Regulation 19 NLWP has the potential to deliver a wide range of social, environmental and economic benefits, it also identified several instances where there is a potential negative impact on sustainability objectives, a number of uncertain impacts and a range of opportunities for further enhancements to improve the NLWP's sustainability.

7.1.3 These specific recommendations will be considered when preparing the Regulation 22 'Submission' NLWP alongside all comments received during the Regulation 19 consultation which this SA supports.

7.1.4 Although these recommendations may result in some amendments to the Plan, they do not seek to significantly alter the purpose of Plan and many relate to measures that can be taken during the implementation of the plan to mitigate or avoid unacceptable impacts.

nlwp
north london waste plan

Equality Impact Assessment

January 2019

Proposed submission
North London Waste Plan

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Albanian ☐ Ky dokument është pjesë e Planit të Mbeturinave të Londrës Veriore. Në qoftë se ju duhet ndihmë me përkthimin, lutemi shënoni (tick) këtë kuti, shkruani emrin dhe adresën tuaj tek kutia në fund të këtij formulari dhe dërgojeni tek adresa e dhënë.

Arabic ☐ هذه الوثيقة هي جزء من وحدة نفايات شمال لندن. إن كنت بحاجة إلى ترجمة، ضع إشارة في الإطار المربع وأضف اسمك وعنوانك في الإطار المربع في أسفل هذه الاستمارة وأرسلها على العنوان المبين.

Bengali ☐ এই দলিলটি (ডকুমেন্ট) 'নর্থ লন্ডন ওয়েস্ট প্ল্যানে'এর একটি অংশ। উক্ত দলিলটির অনুবাদের জন্য যদি আপনার কোন সহায়তার দরকার হয়, তাহলে দয়া করে এই বাক্সটিতে টিক দিন, তারপর এই ফর্মের নিচের দিকে দেওয়া বাক্সে আপনার নাম ও ঠিকানা লিখে ফর্মটি প্রদত্ত ঠিকানায় ফেরত পাঠিয়ে দিন।

Chinese ☐ 本文件是北倫敦廢物規劃的一部分。如果您需要翻譯方面的幫助，請在上面的小方格裏打鈎號，並在本表格底部的方格裏填上您的名字和地址，把表格寄到指定地址。

French ☐ Ce document fait partie du Programme de Gestion des Déchets du Nord de Londres. Si vous avez besoin d'une traduction, vous êtes prié de cocher cette case, d'inscrire votre nom et adresse dans la case au bas de ce formulaire et de nous le retourner à l'adresse indiquée.

Greek ☐ Αυτο το εγγραφο είναι μέρος,
του Σχεδιου Αποβλητων του Βορειου Λονδινου στην εκθεση ζητηματων και επιλο–γων του σχεδιου. Αν χρειαζεστε βοηθεια με την μεταφραση του, παρακαλω βαλτε τικ σεαυτ ο το τετραγωνο, προσθεστε το ονομα και την διευθυνση σας στο κουτακι που βρισκεται στο κατω μερος αυτης της αιτησης και επιστρεψετε την στην διευθυνση που δινεται

Gujarati ☐ આ દસ્તાવેજ નોર્થ વેસ્ટ લંડન પ્લાનનો હિસ્સો છે. જો તમને તેના ભાષાંતરમાં સહાયતા જોઈતી હોય, તો કૃપા કરીને આ ખાનામાં ટિકની નિશાની કરો. આ ફોર્મમાં નીચે આપેલા ખાનામાં તમારું નામ અને સરનામું લખો અને તેમાં બતાવેલા સરનામે તે પાછું મોકલી આપો.

Punjabi ☐ ਇਹ ਦਸਤਾਵੇਜ਼ ਨੌਰਥ ਲੰਡਨ ਵੇਸਟ ਪਲੈਨ ਦਾ ਇਕ ਹਿੱਸਾ ਹੈ। ਜੇਕਰ ਤੁਹਾਨੂੰ ਇਸਦੇ ਅਨੁਵਾਦ ਵਾਸਤੇ ਮਦਦ ਦੀ ਲੋੜ ਹੈ ਤਾਂਕ੍ਰਿਪਾ ਕਰਕੇ ਇਸ ਖਾਨੇ ਨੂੰ ਟਿੱਕ ਕਰੋ, ਅਤੇ ਇਸ ਫ਼ਾਰਮ ਦੇ ਥੱਲੇ ਦਿੱਤੇ ਖਾਨੇ ਵਿਚ ਆਪਣਾ ਨਾਮ ਅਤੇ ਪਤਾ ਲਿਖੋ ਅਤੇ ਦਿੱਤੇ ਹੋਏ ਪਤੇ 'ਤੇ ਵਾਪਸ ਭੇਜ ਦਿਓ।

Polish ☐ Niniejszy dokument jest częścią raportu dotyczącego kwestii i możliwości Projektu Zagospodarowania Odpadów w Północnym Londynie (North London Waste Plan). Jeśli potrzebujesz pomocy w zakresie tłumaczenia, zaznacz powyższą kratkę, wpisz swoje imię, nazwisko i adres w puste pole w dolnej części formularza i odeślij pod wskazany adres.

Somali ☐ Warqaddani waxay qeyb ka tahay qorshaha qashinka ee woqooyiga London. Haddii aad u baahantahay taageero xaga tarjumaada ah, fadlan calaamadee sanduuqan, raaci magacaaga iyo cinwaankaaga sanduuqa ku yaal foomkan hoostiisa kuna soo celi cinwaanka ku qoran.

Spanish ☐ Este documento forma parte del plan de desechos del norte de Londres [*North London Waste Plan*]. En caso de requerir traducción, marque esta casilla y escriba su nombre y dirección en el recuadro que aparece en la parte inferior de este formulario y envíelo a la dirección que se indica.

Turkish ☐ Bu belge, Kuzey Londra Atık Planı'nın bir parçasıdır. Tercümeyle ilgili yardıma gereksinim duyarsanız, lütfen bu kutuyu işaretleyin ve bu formun sonundaki kutuya adınızı, soyadınızı ve adresinizi yazdıktan sonra belirtilen adrese gönderin.

☐ **Urdu**

یہ دستاویز نارتھ لندن ویسٹ پلان کا حصہ ہے۔ اگر آپ کو ٹرانسلیشن میں مدد کی ضرورت ہے تو مہربانی فرما کر اس خانے میں ٹک کریں، اور اس فارم کے نیچے خانے میں اپنا نام اور ایڈریس لکھیں اور دیئے گئے ایڈریس پر واپس بھیج دیں۔

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Equality Impact Assessment

Pro Forma for the Initial Assessment

Name of the Document to be assessed:

North London Waste Plan (NLWP) Publication (Pre-Submission) Draft

Completed By:

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Date Completed:	27.09.18

Signed off by:

Name:	Carolyn Williams
Position:	Group Leader (Minerals and Waste)
Date signed off: (approved)	27.09.18
Date on which the document and EQIA is to be reviewed	Submission (Regulation 22

1. Purpose of the EQIA

This Equalities Impact Assessment (EqIA) has been undertaken to investigate the implications of the emerging NLWP and complement the ongoing sustainability appraisal process.

The purpose of an EqIA is to ensure that policies and strategies do not discriminate against specific target groups and, where possible, contribute to improving the lives of local communities. It is a systematic process which considers the needs of each target group and is, in effect similar to undertaking a risk assessment.

It is a two stage process. The first stage is a screening stage of the assessment process. Screening identifies the positive and negative impact of the policy or strategy on the equality target groups and identifies gaps in knowledge. If any negative effects of high significance are indentified then a more detailed second stage assessment will be undertaken focusing on the significant negative impacts and identifying possible mitigation scenarios. Consultation with stakeholders and members of the equality target groups is undertaken during both phases.

Legislation

Legislation relating to equality and diversity has been in existence for many years. Recently much of the existing equality legislation was brought together and strengthened under the Equality Act 2010[1]. The Act sets out nine protected characteristics which cannot be used as a reason to treat people unfairly (these are listed in the appendix). The Act sets out the different ways in which it is unlawful to treat people such as direct and indirect discrimination, harassment and victimisation. The act prohibits unfair treatment in the workplace; when providing services; and exercising public functions. The act came into force on 1 October 2010.

The Public Sector Equality Duty commenced in April 2011, which requires public bodies to consider all individuals in shaping policy, delivering services, and in relation to their own employees. It requires public bodies to have regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people

[1] Further details available at the Equality and Human Rights Commission website (https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty)

2. Equality Target Groups

For the purpose of this assessment, the following equality areas have been considered:

Race
Disability
Gender including gender reassignment
Sexual Orientation
Religion and Belief
Age
Socio-economic
People who are pregnant or subject to maternity legislation
People with dependents and caring responsibilities

It is recognised however that many of these equality target groups may overlap and have similar needs and/or be subject to similar prejudices.

The target groups are based on those adopted in the regional guidance written by Transport for London (TfL) and the Greater London Authority (GLA) and other functional bodies. It also pays due regard to the Public Sector Equality Duty. The identified groups are also reflected in the available EqIA guidance of the London Borough's within the plan area. They are considered suitable to reflect the diverse population within the seven London Boroughs.

It is considered that the impacts and the benefits of waste management facilities are felt on a local, geographical basis. The analysis is therefore mainly a spatial one, concentrating especially on the geographical distribution of the above equality groups in North London. This analysis will help develop an understanding of whether the potential impacts of waste management facilities could be greater with regard to the equality groups.

3. The North London Waste Plan (NLWP)

The NLWP is at the Proposed Submission stage (Regulation 19). It has been prepared following consideration of responses received to the consultation on the draft NLWP (Regulation 18) which took place in 2015. Consultation on the draft NLWP provided an opportunity for stakeholders and communities to comment on the plan and proposed policies. A report on the outcomes of this consultation is available to view on the NLWP website[2].

Six two-part public consultation events were held from 2nd September to 11th September 2015 consisting of both facilitated afternoon workshops requiring registration and evening drop-in sessions. These took place in each North London Borough, with the exception of Islington which co-hosted a combined event in Camden close to the borough boundary and Enfield which held one evening drop in session due to lack of attendance at the afternoon workshop.

An additional meeting was scheduled in Hackney specifically concerning the suitability of the Theydon Road area identified in the previous consultation draft for the development of waste management facilities. The purpose of these events was to seek views from residents and interested parties on development management policies, sites and areas set out in the draft

Evidence gathering to inform the preparation of the NLWP has been underway since April 2013. The draft Plan consulted on in 2015 was accompanied by a number of evidence base documents and supporting work. In preparing the Proposed Submission Plan, updates have been undertaken to the data studies that provide the main body of evidence that has informed the approach set out in the Plan.

The Proposed Submission Plan is the version of the NLWP that the Boroughs intend to submit to the Secretary of State for examination. It is being published to allow the opportunity for stakeholders and communities to submit representations on the soundness and legal and procedural compliance of the Proposed Submission Plan.

Representations made during consultation on the Proposed Submission Plan will be considered and any proposed changes will be submitted to the Inspector for examination along with supporting documents.

[2] Further details available at the following website link http://www.nlwp.net/

Once the Plan is submitted, an independent Inspector will be appointed (on behalf of the Secretary of State) to examine whether the NLWP meets the required legal and soundness tests, including duty to co-operate and procedural requirements.

The aim of the North London Waste Plan (NLWP) is to: *"To achieve net self-sufficiency for LACW, C&I and C&D waste streams, including hazardous waste, and support a greener London by providing a planning framework that contributes to an integrated approach to management of materials further up the waste hierarchy. The NLWP will provide sufficient land for the sustainable development of waste facilities that are of the right type, in the right place and provided at the right time to enable the North London Boroughs to meet their waste management needs throughout the plan period".*

The objectives of the draft NLWP are as follows:

SO1. To support the movement of North London's waste as far up the waste hierarchy as practicable, to ensure environmental and economic benefits are maximised by utilising waste as a resource:
Met through Policies 2, 4, 6, 7 and 8

SO2. To ensure there is sufficient suitable land available to meet North London's waste management needs and reduce the movements of waste through safeguarding existing sites and identifying locations for new waste facilities:
Met through Policies 1, 2, 3, 4, 7 and 8

SO3. To plan for net self-sufficiency in LACW, C&I, C&D waste streams, including hazardous waste, by providing opportunities to manage as much as practicable of North London's waste within the Plan area taking into account the amounts of waste apportioned to the Boroughs in the London Plan, and the requirements of the North London Waste Authority:
Met through Policies 1, 2, 3, 4, and 8

SO4. To ensure that all waste developments meet high standards of design and build quality, and that the construction and operation of waste management facilities do not cause unacceptable harm to the amenity of local residents or the environment:

Met through Policy 5

SO5. To ensure the delivery of sustainable waste development within the Plan area through the integration of social, environmental and economic considerations:
Met through Policies 2, 5 and 7

SO6. To provide opportunities for North London to contribute to the development of a low carbon economy and decentralised energy:
Met through Policy 6

SO7. To support the use of sustainable forms of transport and minimise the impacts of waste movements including on climate change:
Met through Policy 5

SO8. To protect and, where possible, enhance North London's natural environment, biodiversity, cultural and historic environment:
Met through Policy 5

The NLWP sets out the planning framework for the management of North London's waste. The purpose of the plan is to ensure there will be adequate provision of waste management facilities of the right type, in the right place and at the right time up to 2035 to manage this waste.

Who defined the terms/scope of the document? (e.g. central or regional government/ Stakeholders/Consultation)

The broad scope for the NLWP is determined by Government Guidance in the National Planning Policy for Waste (NPPW), The National Planning Policy Framework, the Waste Management Plan for England and National Policy Statements for Waste Water and Hazardous Waste, and any successor documents. The scope is also defined by the Mayor's London Plan as Local Plan documents are required to be in general conformity with this.

The duty to co-operate was introduced by the Localism Act 2011. Local planning authorities are now required to formally co-operate with other local planning authorities and bodies prescribed in the Town and Country Planning (Local Planning) (England) Regulations 2012 on strategic matters. These are defined as matters relating to the sustainable development or use of land that would have

a significant impact on at least two local planning authorities or on a planning matter that falls within the remit of a county council, for example waste and minerals planning. The duty requires local planning authorities and other public bodies to engage constructively, actively and on an ongoing basis to develop strategic policies. Meeting the requirements of the duty to co-operate is a key part of the plan making process for the NLWP and the North London Boroughs are working closely with other waste planning authorities that are critical for the delivery of an effective waste strategy for North London.

In addition, the North London Boroughs are working closely with the London Legacy Development Corporation (LLDC) to plan for waste within the areas of Hackney and Waltham Forest which fall under the jurisdiction of the LLDC. An agreement for the working relationship between the North London Boroughs and the LLDC has been drawn up. This agreement, or Memorandum of Understanding, identifies the Sites and Areas suitable for waste within the Hackney and Waltham Forest parts of the LLDC area.

Engagement and consultation does not end with the duty to co-operate. The North London Boroughs are also seeking views from other bodies, organisations and residents throughout the plan-making process and the framework for this is set out in the NLWP Consultation Protocol. Other consultees include the Waste Disposal Authority (North London Waste Authority or NLWA). The NLWA is responsible for managing the waste collected by the north London boroughs, in particular household waste. The NLWP is required to ensure there is adequate provision for the disposal and recovery of this waste.

The policies within the NLWP have been developed in partnership with a number of consultees and stakeholders through consultation exercises and continued community involvement. Full details on the consultation process are available through the Consultation Report that accompanies the Proposed Submission Plan.

Is the document directed or influenced by another policy controlled by the Councils?

The North London Waste Plan (NLWP) will sit within the suite of local planning policy documents of each of the seven North London Boroughs and will also facilitate the delivery of the Joint Municipal Waste Management Strategy

(JMWMS) prepared by the North London Waste Authority (NLWA). Each of the seven Boroughs has an adopted Core Strategy or Local Plan in place containing an overarching policy on sustainable waste management. Each of these policies provides the local strategic policy for the development of the NLWP. The NLWP will provide the planning framework alongside detailed guidance for waste development across the seven Boroughs.

Are there any other Council services or external agencies who share responsibility for the document?
Who implements the policy and who is responsible for it?
(i) the responsibilities which the Councils holds and
(ii) the responsibilities held by other bodies (public, private or 'other')

Local Planning Authorities are responsible for monitoring the Plan and ensuring decisions on planning applications are made in line with the Waste Plan, their individual Local Plan and other Development Plan or Supplementary Planning Documents. Once adopted, the NLWP will form part of the Local Plan for each Borough.

Landowners have a role in putting forward suitable suites for waste management proposals.

The Waste industry has the role of initiating, constructing and operating sites for waste management in accordance with the NLWP.

The Environment Agency has role in regulating the operation of waste management developments in terms of regulating groundwater quality through abstraction and discharge permits, permitting waste sites and monitoring waste permits. They are also responsible for managing information on waste entering and leaving permitted sites.

The North London Waste Authority are responsible for managing the disposal of Local Authority Collected Waste (LACW) in North London.

4. Overview of the NLWP Area

Population

The area covered by the NLWP encompasses seven London Boroughs - Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. The North London area is one of the most densely populated areas in the UK. Recent statistics[3] show that the population has risen from 1.64 million in 2002 to an estimated 2.03 million in 2017 and that the population continues to grow at a rate above the national average.

All of the Boroughs saw an increase in population between 2002 and 2017. Population increases have varied from around 18.5% growth in Enfield to just over 30% in Hackney and Islington over the 25 year time period. The highest density is in the inner London boroughs of Islington, Hackney and Camden, closely followed by Haringey. Waltham Forest, Barnet and Enfield are the least densely populated of the North London Boroughs, however these Boroughs are substantially more densely populated than the rest of the country. Barnet and Enfield have a population density that is less than the average of London.

Hackney, Islington, Haringey, and Waltham Forest are ranked within the 30 most deprived areas in the country[4]. The indices of deprivation are based on income; employment; health and disability; education, skills and training; barriers to housing and services; living environment; and crime.

Ethnic Diversity

The latest survey data (2017) shows that the majority of people in the seven North London Boroughs gave their ethnic origin as White (Table 1). Five of the Boroughs had Asian populations above 10% with Barnet and Waltham Forest having the greatest percentage share. In terms of people identifying themselves as Black, five of the Boroughs had populations above 10% with Hackney and Waltham Forest featuring the greatest proportions[5].

[3] Office for National Statistics – Mid Year Population Estimates (2017)
[4] MHCLG Indices of Deprivation (2015) https://data.london.gov.uk/dataset/indices-of-deprivation-2015
[5] Data from Office for National Statistics Annual Population Survey (https://data.london.gov.uk/dataset/ethnic-groups-borough)

Table 1 – Ethnicity

Borough	White	Asian	Black	Mixed/ Other	Total
Barnet	68.7%	14.9%	3.6%	12.8%	100%
Camden	62.4%	12.8%	8.8%	16.0%	100%
Enfield	64.6%	12.2%	14.0%	9.2%	100%
Hackney	54.5%	10.5%	17.3%	17.7%	100%
Haringey	66.9%	6.8%	14.4%	11.9%	100%
Islington	64.5%	7.7%	11.1%	16.7%	100%
Waltham Forest	56.0%	14.8%	16.2%	13.4%	100%

Source: Office for National Statistics Annual Population Survey

Religion

The Christian faith is the highest represented faith in all of the seven North London Boroughs. In Barnet, the second most popular faith is Jewish but in all the other boroughs, the Muslim faith represents the second highest faith group[6] .

Health

Life expectancy for females across the seven North London Boroughs is higher than the average for England based on statistics for a rolling average over the period 2012-2014[7]. For males living in Barnet, Enfield, Camden and Haringey, life expectancy is higher than the average for England.

Disability

In the UK it is thought that approximately 15% of the population could be defined as Disabled under the Disability Discrimination Act. A limiting long term illness incorporates health problems and disabilities which limit daily activities. Table 2 below shows the number of people with Long-Term Health problems or Disability nationally, within London and within the seven North London Boroughs.

[6] Data from Census (2011) https://data.london.gov.uk/dataset/percentage-population-religion-borough
[7] Office for National Statistics https://data.london.gov.uk/dataset/life-expectancy-birth-and-age-65-borough

Table 2: People with a Long-Term Health Problem or Disability [8]

	Day-to-day activities limited a lot	Day-to-day activities limited a little	Day-to-day activities not limited
	Persons	Persons	Persons
	Percentage	Percentage	Percentage
Camden	7.0	7.4	85.6
Hackney	7.3	7.2	85.5
Haringey	6.8	7.2	86.0
Islington	8.0	7.6	84.3
Barnet	6.6	7.4	86.0
Enfield	7.3	8.1	84.6
Waltham Forest	6.9	7.6	85.4
London	**6.7**	**6.9**	**86.4**

Source: Census (2011)

Age

London has lower proportions of older age groups than average across the UK, a trend that has continued since 2001.This is because the people who have moved into London over the last few decades have tended to be young people, whilst those that have moved out have tended to be people reaching retirement. Although the number of persons aged 65 and over in London increased slightly from 892,000 in 2001 to 905,000 in 2011, the proportion of persons aged 65 and over made up only 11.1 per cent of London's population in 2011 (down from 12.4 per cent in 2001). So, although the older population is growing, it is growing at a slower rate to the other age groups and in relative terms makes up a smaller proportion of the total.

Table 3 below shows the average median age for the seven North London Borough's over the time period mid-2001 to mid-2017[9]. The table demonstrates that all of the seven North London Boroughs have younger age profile compared to England; and with the exception of Barnet and Hackney, exhibit a median age lower than the average for London as a whole.

[8] Data from Census (2011) https://data.london.gov.uk/dataset/2011-census-health-care
[9] Office for National Statistics – Mid Year Population Estimates (2017)

Table 3: Average Median Age (mid 2001 – mid 2017)

Borough	Average Median Age (years)	
	Mid 2017	Mid 2001
Barnet	36.8	35.4
Camden	34.0	32.4
Hackney	35.8	35.6
Haringey	32.7	31.6
Islington	35.0	32.4
Enfield	32.1	32.7
Waltham Forest	34.5	33.2
London	35.1	34.0
England	39.8	37.8

Source: ONS Mid-Year Estimates (2017)

Table 4 sets out the resident population of the north London Boroughs by broad age band in % along with the national and regional averages[10].

Table 4: resident population by broad age band in %

	0-15 years	16-24 years	25-49 years	50-64 years	65+ years
Camden	17.5%	12.9%	43.6%	14.2%	11.9%
Hackney	20.8%	9.8%	49.3%	12.7%	7.4%
Haringey	20.1%	10.5%	44.2%	15.4%	9.8%
Islington	16.0%	14.7%	47.2%	13.3%	8.8%
Barnet	21.4%	9.8%	38.3%	16.3%	14.2%
Enfield	22.8%	10.5%	36.7%	17.0%	13.0%
Waltham Forest	22.1%	10.0%	42.3%	15.2%	10.5%
London	**20.5%**	**10.5%**	**41.5%**	**15.7%**	**11.8%**

Source: ONS Mid-Year Estimates (2017)

Employment

Waltham Forest and Islington have the highest levels in terms of employment rate amongst those persons aged 16 to 64 (Table 5). Both are higher than the rate for England and London as a whole. Conversely, Hackney, Haringey, Enfield and Camden have lower employment rates for the16-64 year olds compared to the average for London.

[10] Office for National Statistics – Mid Year Population Estimates (2017)

Table 5: Employment Rate (16-64 year olds) 2004 - 2017

	2004	2017
Barnet	70.5	74.9
Camden	67.8	66.4
Enfield	69.4	68.7
Hackney	56.1	73.1
Haringey	57.6	68.0
Islington	62.7	77.0
Waltham Forest	62.1	78.1
London	68.1	74.0
England	72.8	75.1

Source: ONS, Annual Population Survey

5. Who is Likely to be affected by the NLWP

Waste affects most people's lives in some way. Waste is produced by residents, communities and businesses and the NLWP intends to plan for dealing with this waste. The NLWP is a strategic level document that is concerned with strategic waste planning policies and the identification of sites based on planning merit. It is primarily concerned with the type and quantum of waste generated in the plan area and the land and facilities to manage it.

Existing waste management sites form an important part of the strategic waste plan for north London and are safeguarded for waste use through NLWP Policy 1. These sites have developed over decades outside of a strategic plan for waste, and in locations which may have been suitable for waste uses but which did not create an even geographical spread across North London. Most of the existing sites are to the east of the area in the Lee Valley corridor.

The NLWP is underpinned by an aim to achieve net self-sufficiency for LACW, C&I, C&D waste streams, including hazardous waste. This will be achieved by identifying enough land in North London suitable for the development of waste management facilities to manage the equivalent of 100% of this waste arising in North London. The objective is to reduce movements of waste, including waste exports, and increase the amount of waste managed in proximity to its source.

As well as the existing waste sites, the NLWP identifies a number of areas to meet future waste needs throughout the Plan period to 2035 and these have equal status in the delivery of the NLWP. The areas identified can comprise a number of individual plots of land, for example, an industrial estate or

employment area that are in principle suitable for waste use but where land is not safeguarded for waste. There are three specific reasons for following this approach. The (NPPW) and draft London Plan endorse the identification of “sites and/or areas” in Local Plans. The National Planning Practice Guidance (NPPG) adds that waste planning authorities in London will need to “plan for the delivery of sites and areas suitable for waste management”.

In preparing the Proposed Submission version of the NLWP, and deciding which sites and areas to take forward, the North London Boroughs took into account a number of factors including national and regional policy, the aims of the NLWP and consultation responses on the Draft Plan, including issues raised around deliverability and other constraints. Further work was undertaken to gather and assess any additional information on the proposed sites and areas received during the consultation or as a result of new data being published.

The North London Boroughs developed a range of reasonable options for managing North London’s waste leading to the selection of the preferred strategy. The scenarios considered looked at a range of options for recycling from maintaining the status quo to seeking to maximise opportunities for recycling in line with the targets set out in the Proposed Submission version of the Plan, the latter option being the most popular option and taken forward. An Options Appraisal Report (2018) has been prepared which provides more detail on each of the options considered and provides information on the different scenarios including how much waste would be generated over the plan period (incorporating economic and population growth assumptions), how much waste could be managed within North London (capacity strategy), and how this waste should be managed (management strategy) for each of the options considered.

Any potential use listed within the NLWP as potentially suitable within the areas has been subject to consideration against the full suite of relevant planning policies/guidance as outlined in the NLWP and will be assessed with regards to local circumstances as part of the planning application process.

The area selection process also took into account the proximity of sensitive receptors (such as schools and hospitals), thereby helping to minimise the impact on vulnerable sections of the community. Implementation of the policies and proposals should not lead to unacceptable adverse effects on different communities.

The majority of the areas are located to the east of the area in the Lee Valley

corridor. This reflects the nature of boroughs which vary throughout North London with some boroughs better equipped to deliver suitable waste sites/areas than others. The geography of North London clearly influences the spread of waste sites. For example, some areas such as the green belt in the north are unsuitable for built waste facilities, while larger and co-located facilities are likely located at sites away from urban centres and sensitive receptors.

The areas being put forward are therefore considered to be in the most suitable, sustainable and deliverable locations in North London for new waste management facilities when assessed against the environmental, economic and social factors and the spatial strategy.

Policies are also proposed in the Plan. All planning applications for waste uses will be assessed against the NLWP policies and other relevant policies in the development plan and any associated Supplementary Documents (SPDs)/guidance. Any proposals for waste development will be expected to take account of the full suite of relevant policies and guidance. The policies have been developed with reference to regional and local policies as well as national policy and guidance, in particular the National Planning Policy Framework (NPPF), National Planning Policy for Waste (NPPW) and National Planning Practice Guidance (NPPG).

The policies will help deliver the NLWP's aim and objectives, spatial strategy and the Provision for North London's Waste to 2035. The policies are:

- Policy 1: Existing waste management sites
- Policy 2: Locations for new waste management facilities
- Policy 3: Windfall Sites
- Policy 4: Re-use & Recycling Centres
- Policy 5: Assessment Criteria for waste management facilities and related development
- Policy 6: Energy Recovery and Decentralised Energy
- Policy 7: Waste Water Treatment Works and Sewage Plant
- Policy 8: Control of Inert Waste

Consideration has also been given to the environmental, economic and social objectives of the Plan through the Sustainability Appraisal process. This has ensured that that there is no preference to, or neglect of, any specific groups as part of the Plan process.

It is considered that the following groups/individuals will benefit from the NLWP:

- Local communities living within the seven North London Boroughs as producers of waste;
- Local communities living outside of the seven North London Boroughs through protection of amenity, protection of the existing environment and through improvements to the environment and through greater provision leading to net self sufficiency;
- The Waste Industry through better information as to which proposals would be approved, as the Plan is intended to guide development; and
- Businesses and job seekers at both construction and end user stages of waste development.

What factors could contribute / detract from the outcomes?

The main factor is a potential lack of implementation of the approach set out in the Plan. Progress of the NLWP will be monitored annually. This will highlight the performance of all policies and allocations and include recommended actions where targets are not met.

6. Initial Screening Form (ISF)

Equality Strand	Differential Impact - Please justify and explain your answer 'YES' or 'NO' Please state any National/Local evidence including any previous or new consultation undertaken to support and justify your claims around differential impacts. If there is limited evidence we **strongly recommend** undertaking consultation Please note – if you identify a differential impact it may be advantageous to discuss whether this impact is also negative and record your findings in the next box If no differential impact is identified there will be NO negative impact	Negative Impact - Please justify and explain your answer 'YES' or 'NO' This can include research, evidence, and, or consultation undertaken when identifying differential impacts.	Can the negative impact be reduced on the grounds of promoting equality of opportunity for another group or for any other reason? When the answer is 'YES', there is a negative impact against one of the equality strands, please explain whether this negative impact can be reduced on the grounds of promoting equality of opportunity for another group or for any other reason?
Race	**No** A wide selection of community groups live within the urban areas, therefore the allocation of waste management sites in the proposed locations does not discriminate against any particular section of the community. The selection of proposed areas for potential waste facilities has taken into account the proximity of sensitive receptors (such as schools and hospitals), thereby helping to minimise the impact on vulnerable sections of the community. Therefore implementation of the policies and proposals should not lead to unacceptable adverse effects on different communities. Waste facilities can also provide employment opportunities both during construction and operation phase, which may be beneficial to all target groups in all Boroughs. The consultations throughout the development of the NLWP have gathered the views of the local community and other relevant stakeholders. Documents have been made as widely available as possible to enable all sectors of the community to comment. Comments were received about the draft Plan (Regulation 18 Stage) that noted the proximity of certain proposed sites and areas to residential areas. These focussed on the general aspect of concerns about waste management facilities and their perceived impact on residential areas and did not highlight any specific equality issues.	**No**	**N/A**

Disability	**No** A wide selection of community groups live within the urban areas, therefore the allocation of waste management sites in the proposed locations does not discriminate against any particular section of the community. The selection of proposed areas for potential waste facilities has taken into account the proximity of sensitive receptors (such as schools and hospitals), thereby helping to minimise the impact on vulnerable sections of the community. Therefore implementation of the policies and proposals should not lead to unacceptable adverse effects on different communities. Waste facilities can also provide employment opportunities both during construction and operation phase, which may be beneficial to all target groups in all Boroughs. The consultations throughout the development of the NLWP have gathered the views of the local community and other relevant stakeholders. Documents have been made as widely available as possible to enable all sectors of the community to comment. Comments were received about the draft Plan (Regulation 18 Stage) that noted the proximity of certain proposed sites and areas to residential areas. These focussed on the general aspect of concerns about waste management facilities and their perceived impact on residential areas and did not highlight any specific equality issues.	**No**	**N/A**
Gender (including gender reassignment)	**No** A wide selection of community groups live within the urban areas, therefore the allocation of waste management sites in the proposed locations does not discriminate against any particular section of the community. The selection of proposed areas for potential waste facilities has taken into account the proximity of sensitive receptors (such as schools and hospitals), thereby helping to minimise the impact on vulnerable sections of the community. Therefore implementation of the policies and proposals should not lead to unacceptable adverse effects on different communities. Waste facilities can also provide employment opportunities both during construction and operation phase, which may be beneficial to all target groups in all Boroughs. The consultations throughout the development of the NLWP have gathered the views of the local community and other relevant stakeholders. Documents have been made as widely available as possible to enable all sectors of the community to comment. Comments were received about the draft Plan (Regulation 18 Stage) that noted the proximity of certain proposed sites and areas to residential areas. These focussed on the general aspect of concerns about waste management facilities and their perceived impact on residential areas and did not highlight any specific equality issues.	**No**	**N/A**

Sexual Orientation	**No** A wide selection of community groups live within the urban areas, therefore the allocation of waste management sites in the proposed locations does not discriminate against any particular section of the community. The selection of proposed areas for potential waste facilities has taken into account the proximity of sensitive receptors (such as schools and hospitals), thereby helping to minimise the impact on vulnerable sections of the community. Therefore implementation of the policies and proposals should not lead to unacceptable adverse effects on different communities. Waste facilities can also provide employment opportunities both during construction and operation phase, which may be beneficial to all target groups in all Boroughs. The consultations throughout the development of the NLWP have gathered the views of the local community and other relevant stakeholders. Documents have been made as widely available as possible to enable all sectors of the community to comment. Comments were received about the draft Plan (Regulation 18 Stage) that noted the proximity of certain proposed sites and areas to residential areas. These focussed on the general aspect of concerns about waste management facilities and their perceived impact on residential areas and did not highlight any specific equality issues.	**No**	**N/A**
Religion and Belief	**No** A wide selection of community groups live within the urban areas, therefore the allocation of waste management sites in the proposed locations does not discriminate against any particular section of the community. The selection of proposed areas for potential waste facilities has taken into account the proximity of sensitive receptors (such as schools and hospitals), thereby helping to minimise the impact on vulnerable sections of the community. Therefore implementation of the policies and proposals should not lead to unacceptable adverse effects on different communities. Waste facilities can also provide employment opportunities both during construction and operation phase, which may be beneficial to all target groups in all Boroughs. The consultations throughout the development of the NLWP have gathered the views of the local community and other relevant stakeholders. Documents have been made as widely available as possible to enable all sectors of the community to comment. Comments were received about the draft Plan (Regulation 18 Stage) that noted the proximity of certain proposed sites and areas to residential areas. These focussed on the general aspect of concerns about waste management facilities and their perceived impact on residential areas and did not highlight any specific equality issues.	**No**	**N/A**

Age	**No** A wide selection of community groups live within the urban areas, therefore the allocation of waste management sites in the proposed locations does not discriminate against any particular age groups. The selection of proposed areas for potential waste facilities has taken into account the proximity of sensitive receptors (such as schools and hospitals), thereby helping to minimise the impact on vulnerable sections of the community. Therefore implementation of the policies and proposals should not lead to unacceptable adverse effects on different communities. Waste facilities can also provide employment opportunities both during construction and operation phase, which may be beneficial to all target groups in all Boroughs. The consultations throughout the development of the NLWP have gathered the views of the local community and other relevant stakeholders. Documents have been made as widely available as possible to enable all sectors of the community to comment. Comments were received about the draft Plan (Regulation 18 Stage) that noted the proximity of certain proposed sites and areas to residential areas. These focussed on the general aspect of concerns about waste management facilities and their perceived impact on residential areas and did not highlight any specific equality issues.	**No**	**N/A**

Socio-economic	**No** A wide selection of community groups live within the urban areas, therefore the allocation of waste management sites in the proposed locations does not discriminate against any particular socio-economic groups. The selection of proposed areas for potential waste facilities has taken into account the proximity of sensitive receptors (such as schools and hospitals), thereby helping to minimise the impact on vulnerable sections of the community. Therefore implementation of the policies and proposals should not lead to unacceptable adverse effects on different communities. Waste facilities can also provide employment opportunities both during construction and operation phase, which may be beneficial to all target groups in all Boroughs. The main opportunity of a new waste management facility is to contribute to the urban regeneration of an area. In particular, facilities can stimulate the local economy by creating markets and providing heat from the waste to the local community and local businesses. Sustainability Objective 1 seeks to protect people health, communities and local environmental quality from the adverse effects of waste management facilities which may help improve health inequalities and multiple deprivation. The consultations throughout the development of the NLWP have gathered the views of the local community and other relevant stakeholders. Documents have been made as widely available as possible to enable all sectors of the community to comment. Comments were received about the draft Plan (Regulation 18 Stage) that noted the proximity of certain proposed sites and areas to residential areas. These focussed on the general aspect of concerns about waste management facilities and their perceived impact on residential areas and did not highlight any specific equality issues.	**No**	**N/A**

People who are pregnant or subject to maternity legislation	**No** A wide selection of community groups live within the urban areas, therefore the allocation of waste management sites in the proposed locations does not discriminate against any particular socio-economic groups. The selection of proposed areas for potential waste facilities has taken into account the proximity of sensitive receptors (such as schools and hospitals), thereby helping to minimise the impact on vulnerable sections of the community. Therefore implementation of the policies and proposals should not lead to unacceptable adverse effects on different communities. Waste facilities can also provide employment opportunities both during construction and operation phase, which may be beneficial to all target groups in all Boroughs Sustainability Objective 10 relates to protecting improving air, water and soil quality which may have particular benefits for pregnant members of the community. The consultations throughout the development of the NLWP have gathered the views of the local community and other relevant stakeholders. Documents have been made as widely available as possible to enable all sectors of the community to comment. Comments were received about the draft Plan (Regulation 18 Stage) that noted the proximity of certain proposed sites and areas to residential areas. These focussed on the general aspect of concerns about waste management facilities and their perceived impact on residential areas and did not highlight any specific equality issues.	**No**	**N/A**

People with dependents and caring responsibilities	**No** A wide selection of community groups live within the urban areas, therefore the allocation of waste management sites in the proposed locations does not discriminate against any particular groups. The selection of proposed areas for potential waste facilities has taken into account the proximity of sensitive receptors (such as schools and hospitals), thereby helping to minimise the impact on vulnerable sections of the community. Therefore implementation of the policies and proposals should not lead to unacceptable adverse effects on different communities. Waste facilities can also provide employment opportunities both during construction and operation phase, which may be beneficial to all target groups in all Boroughs. The consultations throughout the development of the NLWP are designed to gather the views of the local community and other relevant stakeholders. The contribution of different groups will be monitored through consultation responses. Documents are being made as widely available as possible. Comments were received about the draft Plan (Regulation 18 Stage) that noted the proximity of certain proposed sites and areas to residential areas. These focussed on the general aspect of concerns about waste management facilities and their perceived impact on residential areas and did not highlight any specific equality issues.	**No**	**N/A**

Taking into account the views of the groups/experts, and the available evidence or any consultation undertaken - Please clearly evidence how the EIA has influenced any changes to the document.

N/A as no differential/ negative impacts were identified

As a result of these conclusions what actions (if any) will be included in your business planning and wider review processes?

N/A as no differential/ negative impacts were identified

7. Equality Monitoring

Legal duties require the Councils to monitor its policies for any adverse impacts on promoting race, gender and disability equality and to **publish the results of this monitoring**. In anticipation of emerging legal duties the Councils are extending this monitoring requirement in order to examine differential impacts in the areas of: age, sexual orientation, religion and belief and carers.

What performance indicators (if any) will be used to monitor the impact of the document on relevant groups?

The NLWP will be monitored during implementation. Monitoring is crucial to the successful delivery of the spatial vision and objectives of the Plan and will be undertaken on a continuous basis. The proposed monitoring indicators reflect the statutory and non-statutory performance targets including those set by the EU, the Waste Policy for England and the London Plan. The list of indicators is not intended to be exhaustive and is intentionally focused on parameters where it is possible to evaluate the effect of the NLWP in isolation. Proposed monitoring indicators are included in the NLWP. Monitoring data will be collected annually.

It is also proposed that the Waste Data Study (the comparison of available capacity with current and future waste management needs) that informs the NLWP should be updated every two years as a further systematic check on progress.

Please state clearly what monitoring systems have been used to date and/or will be used to measure the impact of the document on relevant groups.

The NLWP contains an implementation and monitoring section which sets indicators and targets to monitor the effectiveness of the policies. Responsibility for monitoring lies with the individual Boroughs. The finalised monitoring arrangements will be designed to provide information that can be used to highlight specific performance issues and significant effects. Monitoring will lead to more informed decision-making and provide a useful source of baseline information for future Local Plan Documents.

Please clearly state how often and where you will publish the results of monitoring.

The outcomes of monitoring will be set out within the individual Borough's Annual Monitoring Report which are published and placed on the individual Council's website.

Do the conclusions and evidence in the initial EIA suggest a more detailed, i.e. Full EIA is required?

Yes ☐ No ☑

Please explain:

No differential/negative impacts have been identified and therefore a full EIA is not required.

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North London Waste Plan

Adoption Stage

Equality Impact Assessment

Addendum Report

December 2021

Equality Impact Assessment

Name of Document to be Assessed:

The North London Waste Plan (NLWP)

Completed by:

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Introduction

1.1 This addendum report should be read in conjunction with the main Equality Impact Assessment report produced in January 2019 in support of the joint North London Waste Plan (NLWP) that was submitted for independent examination[1]. This addendum report also assesses the Main Modifications to the NLWP that have been required to ensure legal compliance and soundness of the Plan.

1.2 The EqIA produced in support of the submitted NLWP together with this EqIA addendum have been produced by consultants who have had no direct involvement in preparation or drafting of the NLWP document itself.

1.3 The purpose of the Equality Impact Assessment (EqIA) is to find out whether the implementation of the NLWP will affect different groups of people in different ways, and how this has been taken into account during the development of the document and its policies. In the context of the NLWP Local Plan Document this covers consideration of the plan's policies and proposals. The assessment has been prepared in accordance with the Equality Analysis process followed at previous stages of the waste plan's production.

1.4 The Equality Act 2010 defines the Public Sector Equality Duty and requires public bodies to be pro-active in achieving positive equality towards groups which may have been ignored in the past. The need to undertake an EqIA stems from the general duty placed on local authorities to eliminate unfair discrimination, advance equality of opportunity and foster good relations between people.

Purpose

1.5 An EqIA is an evidence-based approach to policy development intended to ensure that policies, practices and decision-making processes are fair and do not present barriers to participation or disadvantage for protected groups. It provides a way to systematically anticipate and assess the consequences on different groups of people making sure that:

- unlawful discrimination is eliminated;
- opportunities for advancing equal opportunities are maximised; and
- opportunities for fostering good relations are maximised.

1.6 The assessment helps to focus on the impact on people who share one of the nine protected characteristics as defined by the Equality Act 2010, as well as on people who are disadvantaged due to socio-economic factors. The Public Sector Equality Duty which commenced in April 2011, requires public bodies to consider all individuals in shaping policy, delivering services, and in relation to their own employees. It requires public bodies to have regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people.

[1] https://www.nlwp.net/download/equality-impact-assessment-january-2019/?wpdmdl=1279&refresh=61b0768175ff51638954625

1.7 The EqIA considers impacts on groups of people rather than on individuals and as such aims to assess the impact of the NLWP on the following:

- Race - this includes ethnic or national origins, colour and nationality;
- Disability;
- Gender - including gender reassignment;
- Sexual Orientation;
- Religion and Belief – this includes lack of belief;
- Age;
- Marriage and civil partnership;
- People who are pregnant or subject to maternity legislation; and
- People with dependents and caring responsibilities.

Although not a distinct group, the following is also considered:

- Socio-economic factors – this includes income level, educational attainment etc.

1.8 The assessment considers both (positive and negative) disproportionate and differential impacts. In some cases, protected characteristic groups could be subject to both disproportionate and differential equality effects.

1.9 A disproportionate effect arises when an impact has a proportionately greater effect on protected characteristic groups than on other members of the general population at a particular location. Therefore, disproportionality could arise from either:

- An impact predicted for the area where protected characteristic groups are known to make up a greater proportion of the affected resident population than their overall representation in the Borough/ NLWP area / Greater London or national level; or

- Where an impact is predicted in an area predominantly or heavily used by protected characteristic groups (e.g. primary schools attended by children, care homes catering for very elderly people).

1.10 A differential equality effect is one which affects members of a protected characteristic group differently from the rest of the general population due to a specific need, or a recognized sensitivity or vulnerability associated with their protected characteristic, regardless of the number of people affected.

1.11 As explained in the main EqIA[2] [Section 2 refers], it is recognised that many of the equality target groups listed above may overlap and have similar needs and/or be subject to similar prejudices. The analysis undertaken is mainly a spatial one, given that the impacts and the benefits of waste management facilities are felt on a local, geographical basis. Focussing on the above equality groups the analysis

[2] https://www.nlwp.net/download/equality-impact-assessment-january-2019/?wpdmdl=1279&refresh=61b0768175ff51638954625

sought to inform whether the potential impacts of waste management facilities could be greater with regard to the equality groups.

1.12 As appropriate and relevant at each stage of producing the NLWP the Councils have needed to be mindful of the following questions:

- What is the NLWP trying to achieve?
- Who will benefit and whether the policy approach is likely to exclude a specific equality group or community?
- Will the NLWP affect some equality groups or communities differently and can this be justified?
- Does the NLWP have the potential to cause any adverse impact or discriminate against different groups in the community?
- Is the proposal or service to be delivered by the policy likely to be equally accessed by all equality groups and communities? If not, can this be justified?
- Are there any barriers that might make access difficult or stop different groups or communities accessing the proposal or service to be delivered by the policy?
- Could the policy promote equality and good relations between different groups?
- Does the activity make a positive contribution to equalities?

What is the North London Waste Plan?

2.1. The North London Waste Plan (NLWP) provides the policy framework for decisions by the following seven North London Boroughs - Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest (the Borough Councils) - on waste matters over the period up until 2036. Covering the principal waste streams comprising Local Authority Collected Waste (LACW), Commercial and Industrial (C&I), Construction, Demolition and Excavation (CD&E), Hazardous, Agricultural, Wastewater / Sewage Sludge and Low-level radioactive waste (LLW), it seeks the retention and provision of a network of waste management facilities to enable the sustainable management of waste to achieve net waste self-sufficiency.

2.2 The jointly produced NLWP is a pivotal waste planning policy document forming part of the Local Plan for each of the seven Borough Councils. The Plan must be in general conformity with the Spatial Development Strategy i.e., the London Plan, under the terms of S24 of the Planning & Compulsory Purchase Act 2004 (as amended) (2004 Act). The extant version of the London Plan was published in March 2021.

2.3 Whilst each of the seven Borough Councils have strategic waste policies contained within their respective adopted local plans, the strategic waste policies defer to the NLWP to provide a more detailed planning framework for waste development. It sets out the over-arching planning strategy to which other planning documents produced by the Borough Councils and Neighbourhood Plans should be consistent. The adopted plan also facilitates delivery of the Joint Municipal Waste Management Strategy (JMWMS) prepared by the North London Waste Authority (NLWA).

2.4 The NLWP has two main purposes:

- to ensure there will be adequate provision of suitable land to accommodate waste management facilities of the right type, in the right place and at the right time up to 2036, to accommodate the amount of waste required to be managed in North London; and
- to provide policies against which planning applications for waste development will be assessed.

2.5 Changes to the planning system since 2010, including the introduction of the Localism Act 2011 and the National Planning Policy Framework (NPPF), have seen a move away from the principle of producing a portfolio of planning policy documents in the form of a Local Development Framework (LDF). Instead, the Government refers to Local Planning Authorities producing a ‘Local Plan’, which, where possible, consists of a single plan for the area. However, the Borough Councils have considered it appropriate to proceed with the jointly produced NLWP as a strategic level waste plan for covering the whole of their areas.

2.6 The Plan area also includes part of the London Legacy Development Corporation (LLDC), a Mayoral Development Corporation, which is the planning authority for a small part of Hackney and Waltham Forest and other Boroughs that

are not part of the NLWP constituent Borough Councils. However, the Plan cannot directly allocate sites/areas within the LLDC area as this is the responsibility of LLDC as the local planning authority. Although the LLDC is not allocated a share of the waste apportionment, the Plan is required to provide the planning policy framework for waste generated across the whole of the seven Boroughs, including the parts of Hackney and Waltham Forest that lie within the LLDC Area. A Memorandum of Understanding is in place that enables sites/areas identified as being suitable for waste management uses in the Plan in those parts of Hackney and Waltham Forest in the LLDC area to be allocated in the LLDC Local Plan.

Production of the North London Waste Plan

3.1. Ongoing engagements with the public and key organisations have been undertaken throughout the production of the NLWP as part of the specific process followed in terms of the preparation of the Plan through to its adoption. Details of the various stages up until submission for examination are identified in section 3 of the main EqIA document[3] produced in January 2019.

3.2 As a result of the consultations undertaken at the regulation[4] 18 and 19 stages the NLWP Councils had a duty to consider representations and comments received, and then to make any necessary changes to policies in order to ensure that the version of the Plan submitted to the Secretary of State for consideration at examination by the appointed Inspector (regulation 22) was sound. Having considered these representations, the Borough Councils submitted the NLWP for examination on 8th August 2019 and hearing sessions were then subsequently held on 20 and 21 November 2019.

3.3 The ongoing review process continued as the Plan further evolved through the examination stage up until the final stage of adoption. In accordance with section 20(7C) of the Planning & Compulsory Purchase Act 2004, the Borough Councils requested that that the Inspector recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. Therefore, following the hearing sessions, the Borough Councils prepared a schedule of the proposed modifications and, where necessary, carried out Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) of the changes. The MM schedule was then subject to public consultation for six weeks in October to December 2020.

3.4 The examination Inspector has taken account of the MM consultation responses in coming to the conclusions detailed in his report published on 27 October 2021. In paragraph 206 of his report the Inspector concludes, “the Duty to Cooperate has been met and that, with the recommended Main Modifications set out in the Schedule of Main Modifications, the North London Waste Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.” The Inspector is therefore satisfied that the North London Waste Plan as modified provides an appropriate basis for waste planning within the seven north London Borough Councils.

[3] https://www.nlwp.net/download/equality-impact-assessment-january-2019/?wpdmdl=1279&refresh=61a883e9960181638433769

[4] The Town and Country Planning (Local Planning) (England) Regulations 2012 (legislation.gov.uk)

Approach to the Equality Impact Assessment

4.1 The NLWP sets out the overall vision and strategy for handling of waste and siting of waste facilities across the area of north London covered by the seven Borough Councils. On adoption, in respect of waste matters it will become the overarching basis of any other local development plan documents and their policies. Given the area covered by and scope of the NLWP, there may be potential for it to cause adverse impact or discriminate against different groups in the community. Carrying out an EqIA was therefore relevant.

4.2 The jointly prepared NLWP has been informed by a number of different elements for which the following list provides an overview.

- National influences - e.g. National Planning Policy Framework (NPPF), National Planning Policy for Waste (NPPW) and National Planning Practice Guidance (NPPG).
- Regional influences - e.g. Spatial Development Strategy for Greater London – The London Plan (2021).
- Other statutory documents produced by the Borough Councils.
- Evidence base studies.
- Sustainability Appraisal (SA) /Strategic Environmental Assessment (SEA).
- Habitats Regulations Assessment.
- Public and stakeholder consultation - (considered in section 5 of this addendum report).

National Planning Policy Framework (NPPF)

4.3 Replacing a multitude of Planning Policy Statements and Guidance notes, the NPPF was originally published in March 2012. The NPPF is a concise document that has subsequently been amended[5] several times and which must be taken into account when preparing Local Plans. The framework sets out sustainable development principles for wide-ranging policies and makes clear (para 4) that it should be read in conjunction with the Government's planning policy for waste[6]. Also, that when preparing waste plans where relevant regard should be had to policies in the NPPF. The latest National Planning Practice Guidance (NPPG)[7] also provides guidance on the implementation of waste planning policy.

The London Plan

4.4 Local waste plans such as the NLWP need to be in general conformity with the current London Plan adopted in March 2021. The London Plan sets out apportionments of waste to London boroughs who are then expected to allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide capacity to manage the apportioned tonnages of waste. As noted by the Inspector in his report[8], the Mayor has confirmed that subject to the necessary Main

[5] current version published in July 2021
[6] National planning policy for waste - GOV.UK (www.gov.uk)
[7] Waste - GOV.UK (www.gov.uk)
[8] Paragraph 15 of Inspector's report refers

Modifications being made, the NLWP is in general conformity with the London Plan 2021.

Evidence base studies

4.5 In developing planning policies it is essential that they are underpinned by robust evidence. Evidence gathering is a key element in the policy making process, it helps to identify the key issues and challenges faced by an area. Therefore, over the course of preparation of the NLWP a number of background technical studies have been produced and together informed the development of the Plan.

4.6 The NLWP is accompanied by a range of evidence base documents including a Data Study, Options Appraisal, Sites and Areas report and Duty to Co-operate report. There are also reports on the outcomes of all consultations on the NLWP. The evidence from these studies and reports, together with the representations received to the various consultations undertaken, has contributed to informing drafting of the objectives and policies detailed within the NLWP. All of these supporting documents can be viewed on the NLWP document centre website[9].

4.7 Section 4 of the main EqIA report provides an overview of the NLWP area whilst section 5 explains how waste affects most people's lives in some way and considers who is most likely to be affected by the NLWP, including those groups and individuals considered most likely to benefit from the Plan's policies and proposals.

Sustainability Appraisal

4.8 Consideration has also been given to the environmental, economic and social objectives of the Plan through the Sustainability Appraisal process. This has helped to ensure that the social, environmental and economic impacts of the policies developed in the Plan are assessed and taken into account in the decision-making process. Also, that that there is no preference to, or neglect of, any specific groups as part of the Plan process.

Habitats Regulations Assessment

4.9 The NLWP was also subject to a Habitats Regulations Assessment (HRA) during its preparation. This assessment[10] considered the effect of the implementation of the Plan on European protected sites within 10km of the Plan area. It concluded that the NLWP will not result in likely significant effects on any of the Natura 2000 Sites, either alone or in combination with other plans and projects in the Plan area.

4.10 An addendum to the HRA[11] assessed the subsequent Main Modifications and found that they do not have any implications for the HRA. As noted by the Inspector in his report[12], "both assessments conclude that any potential harmful impacts on the nature conservation value of European sites that could arise from the implementation of the Plan can be avoided or mitigated and identifies that Policy 5 of the Plan

[9] Document Centre | North London Waste Plan (nlwp.net)
[10] As required by the Conservation of Habitats and Species Regulations 2017 (as amended).
[11] Produced in September 2020 (NLWP EiP document number CD1/14/Add)
[12] See paragraph 36 of the NLWP Inspector's report

provides an important safeguard for European sites in this regard.” Noting that no statutory consultees or other relevant organisations dispute the findings of the HRA and the addendum produced, the Inspector stated that he is satisfied that the relevant legal requirements relating to Habitats Regulations Assessment have been met.

Consultation and Engagement

5.1. Throughout the preparation and production stages of the NLWP the views and opinions expressed by those individuals and organisations that have an interest in the area have been fundamental to the plan's content. The consultations undertaken at different stages of the draft NLWP have provided an opportunity for stakeholders and communities to comment on and influence the content of the emerging plan and proposed policies.

5.2 The outcomes of these consultations undertaken at these earlier stages are summarised in section 3 of the main EqIA with full details provided in background documents produced. These documents, including the January 2019 report on consultation,[13] and the subsequent consultation report on the modifications. These reports detail the consultation process that was carried out and the responses received to earlier drafts of the NLWP and can be viewed on the NLWP website.[14]

5.3 Representations made during consultation on the Regulation 19 version of the NLWP were submitted to the independent PINS Inspector for examination, along with the draft NLWP and supporting documents. These were then considered by the Inspector as part of the examination process, together with any subsequent proposed changes arising from the representations made at Regulation 19 stage.

5.4 Following examination hearing sessions held in November 2019, a schedule of proposed Main Modifications (MMs) was published and formally consulted on for a six-week period. In finalising his report issued in October 2021 and arriving at his recommendation that the accompanying schedule of MMs be included in the NLWP, the Inspector took account of the responses received to the MMs. The conclusions reached by the Inspector on these matters are covered in below in the following sections of this EqIA addendum report.

Duty to Cooperate

5.5 The duty to co-operate introduced by the Localism Act 2011 requires local planning authorities to formally co-operate with other local planning authorities and bodies prescribed in the Town and Country Planning (Local Planning) (England) Regulations 2012 on strategic matters. The ability to demonstrate that the requirements of the duty to co-operate has been met in terms of engaging constructively, actively and on an ongoing basis in developing strategic policies, has been an essential part of the plan making process for the NLWP. Under the duty the Borough Councils have worked closely with other waste planning authorities that are critical for the delivery of an effective waste strategy for North London.

[13] https://www.nlwp.net/download/report-on-draft-plan-consultation-january-2019/?wpdmdl=1287&refresh=61b1c5817e49a1639040385

[14] Document Centre | North London Waste Plan (nlwp.net)

Availability of the Documentation

5.6 Each consultation version of the NLWP was published on the NLWP website. As well as making the document available electronically hard copies of the NLWP documents were placed in each of the Council's main offices and libraries and made available for viewing. During the period that Covid restrictions affected the ability of consultees to access to documents in main council offices and libraries, hard copies were made available on request. The Plan document was also available on request in a number of different formats, including large print, brail, audiotape, disk or in another language.

Assessment of the Main Modifications and Monitoring of the North London Waste Plan

Consideration of the Main Modifications

6.1 With regard to the EqIA and the protected characteristics outlined in the Equality Act 2010 an assessment is needed and judgement made as to how, if at all, the NLWP policies and proposals would impact on the identified equality groups. The assessment would only identify a positive or negative impact where:

- The impact is expected to be greater for the assessed group than for the population as a whole; or
- Where it affects an equality group differently from the rest of the Boroughs' population because of specific needs or a recognised vulnerability.

6.2 In his report (see pages 4 and 5) the Inspector provides a summary of the modifications which includes:

- Ensuring that the selection process to identify areas to manage the identified waste needs over the Plan period is consistent with the spatial principles of the Plan and is fully justified and explained.
- Ensuring that the methodology and justification for the identification of Preferred Areas for the management of North London's waste over the Plan period are justified and explained.
- Ensuring that the Plan's policies ensure that waste management development proposals provide an adequate balanced approach to protect people and the environment whilst delivering the aims, strategic objectives and spatial principles of the Plan.
- Revising the monitoring and implementation framework to provide a more robust mechanism to assess the delivery of the Plan against its aims, strategic objectives and spatial principles.

6.3 Specifically in respect of consideration of the Main Modifications (MMs) made to the NLWP no negative impacts have been identified. Accordingly, with the exception of the potentially positive differential effects, a few examples of which are explained below, there is little additional to that which is already stated in main EqIA report.[15] (See section 5, in respect of each of the groups most likely to be affected by the NLWP, and 6 with regards to the screening and the equality strands listed there).

6.4 The location of existing waste management sites fails to create an even geographical spread across the seven constituent Borough Councils. Most of the sites being located to the east of the area in the Lee Valley corridor with a particular concentration within the London Borough of Enfield[16]. The MMs considered by the Inspector in his report[17] under "Issue 2 – Whether the Spatial Framework for waste

[15] https://www.nlwp.net/download/equality-impact-assessment-january-2019/?wpdmdl=1279&refresh=61b1e4c7a69c91639048391

[16] Majn Modification 7 explains that Enfield contributes 62% of land currently in waste use in North London, compared to 18% in Barnet, 12% in Haringey and 5% or less in the remaining constituent Boroughs.

[17] Paragraphs 55 to 69 of the Inspector's Report refer.

management is appropriate, is fully justified by the evidence and is soundly based" – will, taken together have a positive impact in terms of assisting to create a more sustainable pattern of waste development across North London.

6.5 Policy 2 (Priority Areas for new waste management facilities) in the NLWP seeks to extend the existing spread of locations for waste facilities by identifying locations that are suitable for waste management use. The MMs serve to better explain how these 'Priority Areas' for new waste facilities have been identified as well as how it is intended that a better geographical spread of waste facilities will be achieved. This will be through limiting the number of Priority Areas in Enfield and the introduction of an area-based approach that identifies certain industrial and employment areas as being the most suitable for waste management uses. It is further explained in the MMs that Policy 2 promotes an 'outside of Enfield first' approach in considering new proposals for waste management and identifies that the combination of existing waste sites and Priority Areas will provide a more sustainable and appropriately located network of waste facilities in the Plan area.

6.6 As the anticipated population of the respective Borough Councils continues to increase so it is likely will the demand for housing, employment and infrastructure facilities and, associated with this growth, the amounts of waste likely to be generated. Focusing waste facilities in a more even geographical spread and at accessible locations closer to facilities and services should reduce the need to transport waste and thereby be more sustainable and minimise impacts. MM11 for example assists in this respect by providing additional text to paragraph 4.26 of the Plan to explain that NLWP Policy 5 requires the consideration of sustainable transport modes in waste development proposals. It also explains that traffic movements can have an impact on amenity along the routes used and that Policy 5 also seeks to minimise such impacts where possible, with reference to the use of low emission vehicles.

6.7 Other MMs largely refer to matters of re-drafting to provide clarification, additional detail and / or the updating of information and are not considered to directly give rise to EqIA considerations in terms of having differential impact on the various equality groups. Overall, therefore, the Equality Impact Assessment of the MMs to the NLWP policies are considered to have either no differential or a positive impact on the recognised equality groups, and no negative impacts on any of the protected characteristic groups.

Inspector's Conclusions

6.8 With regard to the ***Public Sector Equality Duty****,* the Inspector commented in paragraphs 21 and 22 of his report as follows:

> "Throughout the examination, I have had due regard to the equality impacts of the Plan in accordance with the Public Sector Equality Duty, contained in Section 149 of the Equality Act 2010. The Equality Impact Assessment (January 2019) (EqIA) (CD1/17) identifies that the Plan does not lead to any adverse impacts or cause discrimination to any particular groups within the Plan area.

> I have detected no issue that would be likely to impinge upon the three aims of the Act to eliminate discrimination, advance equality of opportunity and foster good relations or affect persons of relevant protected characteristics of age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. Overall, I have no reason to question the conclusions of the submitted EqIA that the Plan is not expected to discriminate against any sections of the community."

6.9 Additionally, in relation to meeting the ***Duty to Cooperate*** the Inspector states[18] that:

> "Overall, I am satisfied that, where necessary, the Borough Councils have engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the DtC has therefore been met."

6.10 With regards ***public consultation and engagement*** the Inspector[19] in his report concludes:

> "During various stages of Plan preparation, consultation on the Plan and the MMs was carried out in compliance with the adopted Statements of Community Involvement (SCIs) for each of the Borough Councils. The requirements of these SCIs were reflected in the Plan Consultation Protocol (CD1/18). The Consultation Statement – August 2019 (CD1/3) and the Consultation Report – Main Modifications Consultation – March 2021 (CD1/3/MM) provide evidence of how community involvement has been achieved."

6.11 In respect of ***Sustainability Appraisal*** the Inspector[20] records that:

> "The Plan was subject to Sustainability Appraisal (SA) during its preparation (CD1/2). Addendums to the SA were also produced to inform the proposed main modifications (CD1/2/Add and CD1/2/Add-MM). No statutory consultees have raised any significant concerns about the sustainability appraisal process."

He then continues concluding that:

> "Overall, I am satisfied that the sustainability appraisal was proportionate, objective, underpinned by relevant and up to date evidence, and compliant with legal requirements and national guidance."

6.12 Finally, the Inspector[21] states that:

> "The Plan complies with all other relevant legal requirements, including the 2004 Act (as amended) and the 2012 Regulations." He therefore goes onto

[18] See paragraph 28 of the Inspector's report
[19] See paragraph 30
[20] Paragraphs 30 - 31 of the Inspector's report refer
[21] See paragraph 41 of the Inspector's report

conclude (para 42) “that all relevant legal requirements have been complied with during the preparation of the Plan.

Monitoring

6.13 Following the Plan’s adoption, in order to ensure implementation of the approach set out in the NLWP, progress made is to be monitored annually. Since the NLWP has been jointly produced, joint monitoring in conjunction with relevant stakeholders, is considered to be the best approach. Therefore, as stated in the Plan, the Borough Councils will publish a joint Annual Monitoring Report (AMR) on an annual basis as some key waste data used for monitoring is released annually.

6.14 The Borough Councils will undertake a comprehensive analysis that will highlight the performance of all policies and allocations and through the annual monitoring reporting will include recommended actions where targets are not met. This annual monitoring will also afford the opportunity to regularly review the NLWP policies, which will include assessment of the impact on people and groups listed in paragraph 1.7 above, including those who share one of the nine protected characteristics as defined by the Equality Act 2010. Further details on monitoring are set out in section seven of the main EqIA report.

6.15 The Inspector considers monitoring under Issue 7 of his report – namely whether the monitoring and implementation framework of the Plan will be effective. He concludes (para 195) that “subject to the recommended MMs, the monitoring and implementation framework is effective and provides a robust framework for monitoring the delivery of the Plan and is sound.”

Conclusion

7.1 This EqIA addendum report, read in conjunction with the main EqIA report, outlines the approach, evidence and findings of the EqIA for the NLWP. Focussing on the impact of the Main Modifications (MMs) made to the Plan through the independent examination process, the assessment has considered equality legislation and the duty of the Borough Councils under the Equality Act 2010. The MMs will, taken together, help to secure a better geographical spread of waste management sites across the North London Borough Council area and also assist in the Councils' aim to achieve net self-sufficiency for the various waste streams.

7.2 The EqIA assessment has found that the NLWP to be adopted, as modified following the examination and receipt of the Inspector's report, does not have any disproportionate or differential negative impacts on any one group with protected characteristics.

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Report for: Cabinet – 21 June 2022

Title: Broadwater Farm – Stapleford North demolition & rehousing

Report authorised by : David Joyce, Director for Housing, Regeneration and Planning

Lead Officer: David Sherrington Programme Manager for Broadwater Farm

Ward(s) affected: West Green

Report for Key/ Non Key Decision: Key

1. Describe the issue under consideration

1.1. Between July 26th and August 26th 2021 the Council undertook a consultation with the 21 eligible households (out of 24) of the Stapleford North block (flats 25-36, 61-72) on Broadwater Farm Estate to seek their views on the future of their block in the light of the Council's plans for Northolt tower and Tangmere block (see 6.1-6.2 below).

1.2. This consultation included the 21 eligible households in the Stapleford North block (flats 25-36 and 61-72). The remaining three properties in the block were ineligible as two of the households were occupied by unauthorised occupants and one was vacant. For the 17 secure Council tenants this consultation was a statutory Section 105 consultation under the 1985 Housing Act.

1.3. Sixty two percent of the 21 respondents supported plans to demolish and replace this block, subject to the outcome of the resident ballot.

1.4. The demolition of Stapleford North (flats 25-36, 61-72) was subsequently included in the proposals presented to all eligible Broadwater Farm residents in an estate wide resident ballot that took place between 11 February 2022 and 7 March 2022. Out of 1,073 eligible voters, 590 (55%) voted during the ballot, with 502 (85%) supporting these proposals.

1.5. This report asks Cabinet to approve the demolition of Stapleford North and to authorise the rehousing of Stapleford North residents (flats 25-36, 61-72) in line with the two decisions detailed above. This report also seeks authorisation to apply the Broadwater Farm Rehousing and Payments Policy (BWFRPP) to these residents for the purpose of the rehousing.

1.6. Pre-tender estimates suggest that the demolition of Stapleford North will cost approximately £600,000. This demolition will be dealt with in conjunction with the demolition of the Northolt block and, therefore, a separate report will be

brought to Cabinet dealing with the procurement and costs of demolition once the procurement route has been agreed. Approval to commence demolition is being sought now to enable the serving of notices, the suspension of Right to Buy and the rehousing of tenants ahead of the demolition contract being procured.

1.7. In addition, this report seeks Cabinet approval of acquisition of leasehold interests set out in the exempt Part B of this report [EXEMPT] to undertake buybacks from the leaseholders in this wing block; and to note that an estimated sum of £151,750 will be utilised in the rehousing all secure tenants.

1.8. These recommendations are in line with the process agreed by Cabinet in July and September 2021.

2. Cabinet Member Introduction

2.1. I am pleased to present this report to progress the next steps of the Broadwater Farm Improvement Programme and to enable the delivery of 294 brand new council homes on the estate. The Broadwater Farm Improvement Programme is a transformational programme of investment into the Broadwater Farm estate that will deliver new council homes, a new medical centre, a grocery shop, enterprise units and public realm improvements for the residents of Broadwater Farm.

2.2. The Council has been working closely with the Broadwater Farm community and architects Karakusevic Carson over the last 18 months to develop proposals for 202 high quality replacement council homes and 92 additional council homes across the estate. These homes will provide a much needed uplift in family housing on the estate, create environmentally friendly homes that are affordable to run, and be prioritised for the most in need residents of Broadwater Farm through the Council's Neighbourhood Moves Scheme.

2.3. As part of this programme, and following a Section 105 consultation with affected residents, a small wing block known as Stapleford North (flats 25-36, 61-72) is scheduled for demolition and replacement due to its location in relation to the Northolt block and the disruption that this would cause to residents. In the S105 consultation, all eligible residents voiced their opinion with 62% supporting the proposals to demolish and replace the block.

2.4. Residents across the estate have been at the heart of every stage of the design, from shaping the priorities for the proposals to having the final say in a resident ballot. The resident ballot closed on 7 March 2022 and was supported by 85% of voting residents, demonstrating that the community overwhelmingly supports the council's investment into their estate. The council will continue working in collaboration with residents to deliver this scheme and ensure that the community remain at the heart of these ambitious proposals.

2.5. The residents of Stapleford North will be supported through every stage of the rehousing process financially and with dedicated support from the council's rehousing team. Every part of the rehousing process has been designed to minimise disruption to these residents and enable them to remain in the local

area wherever possible. Secure tenants and resident leaseholders will also have the right to return to one of the brand new council homes.

2.6. The Broadwater Farm Improvement Programme is an important pillar in the Council's ambition to deliver a new generation of high quality council homes and the recommendations within this report will help make that possible.

3. Recommendations

3.1. In accordance with the decisions taken by Cabinet in July and September 2021, and following the positive ballot outcome and having considered the result of the S105 consultation referred to in paragraphs 6.5-6.18, agrees that Stapleford North (flats 25-36, 61-72) should be demolished. This demolition is estimated to cost approximately £600,000.

3.2. Authorises the Assistant Director of Housing to serve the initial demolition notice and to decide the timing of any final demolition notice to be served.

3.3. Authorises the application of the Broadwater Farm Rehousing and Payments Policy (BWFRPP, see appendix one) and Broadwater Farm Local Lettings Plan (BWFLLP, see appendix three) to Stapleford North (flats 25-36, 61-72) residents for the purpose of this rehousing as initially set out in the report considered by Cabinet on 13 July 2021.

3.4. Agrees that the rehousing of tenants and leaseholders from Stapleford North (flats 25-36, 61-72) pursuant to the BWFRPP, commence in line with the programme for demolition.

3.5. Agrees to the acquisition of all four leaseholders' interests in Stapleford North and gives delegated authority to the Director of Housing, Regeneration and Planning after consultation with the Director of Finance and Cabinet Member for House-Building, Place-Making and Development, to agree the price for each acquisition and the final heads of terms and legal documentations for each acquisition up to a total maximum amount set out in the Exempt Part B of this report.

3.6. To approve the acquisition of the four leaseholder units as set out in 6.23-6.41. being a maximum total sum set out in the exempt Part B of this report.

3.7. Gives delegated authority to the Assistant Director of Housing to approve any individual equity loans to eligible resident leaseholders, as provided for in the Broadwater Farm Rehousing and Payments policy.

3.8. Authorises the Assistant Director of Housing to offer Equity Loans to support the purchase of properties outside the borough in exceptional circumstances taking account of the recommendation of the Discretionary Panel provided for in the Broadwater Farm Rehousing and Payments Policy.

3.9. Approves the application of the Social Tenancy Policy ('STP') for leaseholders previously agreed by Cabinet in July 2020 and provided at Appendix two.

3.10. Authorises the Assistant Director of Housing to approve offers of social tenancies to leaseholders, taking account of the recommendation of the discretionary panel (as set out in the BWFRPP) pursuant to the STP.

4. Reasons for decision

4.1. Following the decision taken in September 2021 to 'Authorise the inclusion of the demolition and reprovision of Stapleford North wing (flats 25-36 and 61-72) on Broadwater Farm in the 'preferred design scenario' and subsequent resident ballot.' and the positive resident ballot outcome, this report seeks approval to begin the work necessary to complete this demolition.

4.2. The report considered by Cabinet on 13 July 2021 recommended that:

'[Cabinet] Agrees that the consultation proposals include extension of the existing Broadwater Farm Rehousing and Payments Policy to residents of Stapleford North in the event that it is decided to demolish the block.'

4.3. Following the decision taken in September 2021 and the subsequent positive ballot outcome, this report seeks the formal extension of the BWFRPP and Broadwater Farm Local Lettings Policy to Stapleford North (flats 25-36, 61-72) residents to enable the rehousing to take place.

4.4. The additional recommendations set out at 3.6-3.10 delegate the authorisations necessary to apply the Broadwater Farm Rehousing and Payments Policy, the Broadwater Farm Local Lettings Policy and the Social Tenancy Policy to Stapleford North residents.

4.5. The request for approval of demolition is necessary to allow for rehousing to begin ahead of the demolition, including the serving of notices and the suspension of Right to Buy. The contract and exact costings to complete the demolition will be procured as a separate package of works to include Northolt demolition and will be subject to a future Cabinet decision.

4.6. The budget set out in the exempt Part B of this report has been developed in close consultation with rehousing colleagues and finance to determine the amount necessary to ensure the rehousing can be undertaken. This budget request has also built upon the experience of rehousing Tangmere and Northolt residents, to ensure that adequate provision is made to deliver on this decision.

5. Alternative options considered

5.1. Do nothing

5.1.1. This option was considered and discounted due to a number of factors:

- The identified need to either structurally improve or to demolish the block.
- The decisions taken by this Cabinet in July and September 2021 concerning Stapleford North.

- The disruption that would be caused due to the proximity to the Northolt block, which was approved for demolition by Cabinet in November 2018.
- The results of the Statutory Section 105 consultation undertaken with residents of this block.
- The loss of the place-making and improved housing delivery options enabled by the demolition of this block.

5.2. **Keep the block in place during the demolition and re-provision of Northolt, and structurally upgrade the block**

- The council considered structurally repairing the Stapleford North block and keeping residents in situ for the majority of the demolition and rebuild of Northolt. This was considered in full by Cabinet in July 2021 and then presented to residents as one of two options in a Section 105 consultation, the results of which were also considered by Cabinet in September 2021.

- The result of this consultation was that 62% of responding residents preferred the option to rehouse them, demolish the block and replace it with high quality council homes. Therefore, this option was discounted as it was not desired by residents and does not align with previous decisions taken by this Cabinet. The full rationale for considering the demolition of this block has been considered by Cabinet in July 2021, September 2021 and is further expanded upon within this Cabinet report.

6. Background information

6.1. Since taking the decision in 2018 to demolish the Tangmere and Northolt blocks on Broadwater Farm Estate due to structural faults, the Council has been working in partnership with residents, wider stakeholders and Karakusevic Carson Architects on designs for new homes and wider estate improvements. This design work was approved by Cabinet in December 2021 and has subsequently been completed to RIBA stage 3, which now forms the basis of a planning application that was submitted in March 2022.

6.2. Through the design work, it became clear that one small wing block on the estate, the Stapleford North block (flats 25-36 and 61-72), was likely to experience very significant levels of disruption over a prolonged period due to its location. Disruption would be caused by the demolition of Northolt (which is connected to the block via a link bridge), the subsequent new build work which will take place on land adjacent to the block as well as the structural and refurbishment works required to bring the homes up to current standards. The disruption would have included noise, dust, changes to access and substantial hoarding around the block for long periods of time. This is further expanded upon at 6.5-6.10, below.

6.3. As a result of these considerations, Cabinet approved a statutory Section 105 consultation to take place with the residents of this block in July 2021 which presented residents with the two options available: demolition and rebuilding of the wing block; or refurbishment and retention of the wing block. The detail of

this consultation is expanded upon in the reports for decisions at Cabinet taken in July 2021 and September 2021 and at 6.11-6.18 of this report.

6.4. Broadwater Farm residents overwhelminingly supported the design proposals in a resident ballot, which concluded on 7 March 2022 with 85.1% of those who voted supporting the proposals.

Stapleford North block

6.5. The Stapleford North block (flats 25-36 and 61-72) is a small wing block connected to Stapleford via a link bridge across Willan Road, on the Broadwater Farm estate in the N17 area of North Tottenham. The block contains 24 one-bedroom properties, with 17 secure tenants, 1 void property, 2 unauthorised occupants and 4 leaseholders. The block is also directly connected to the Northolt tower to the North, via a walkway which provides access to the second floor of Stapleford North.

6.6. The demolition of the Northolt tower was previously agreed by Cabinet in November 2018 following the discovery of significant structural issues and a statutory Section 105 consultation. The demolition is due to start in 2024, after vacant possession of the whole block has been obtained, and is expected to take around 12-months to complete. Whilst measures will be taken to mitigate noise and dust, it would be impossible to mitigate this fully for residents of Stapleford North given the proximity of the block to the Northolt tower.

6.7. This 12-month demolition period will be followed by an approximate two-year construction period for the new homes on the Northolt plot. As above, the council would be seeking to minimise disruption but due to the proximity of the Stapleford North block, do not believe it would be possible to fully mitigate this for residents living here.

6.8. In addition to these considerations, the Stapleford North block itself requires extensive refurbishment works to ensure that the building meets the latest building standards. This work includes structural strengthening to the flank wall and floor slabs within the flats adjacent to the flank walls. This work would have also caused disruption to the residents of Stapleford North.

6.9. In addition to the disruption residents in this block would face, the Design Team, led by Karakusevic Carsen Architects (KCA) have identified that retention of the block would impact the place shaping benefits that could be achieved surrounding the Northolt plot and the nearby Willan Road. They identified that the demolition of the Stapleford North block could allow the Council to better address the priority issues that residents have identified including safety and security, ground floors that encourage activity (as opposed to ground floors solely used for car parking as is the case now), attractive welcoming streets and spaces, and high-quality homes.

6.10. Given these considerations, a statutory section 105 consultation with residents of the Stapleford North block was undertaken on the future of their block. They were presented with two options, whether to retain and refurbish the block; or whether to demolish and replace it. The results of this consultation are expanded upon at 6.11-6.18, below.

Consultation with Stapleford North residents

6.11. On 13th July 2021, the Council's Cabinet agreed to consult the 21 eligible households who live in the Stapleford North wing block on their preference on the future of their block (a further two properties in the block contain unauthorised occupants and one was vacant). As set out in the Cabinet report, the reasons for undertaking the consultation were to seek residents' views given the levels of disruption that they will experience if they remain in their homes due to the demolition of the Northolt tower, construction of the new homes, and refurbishment works required to the block.

6.12. The consultation took place between the 26th July and 26th August 2021 and for the secure council tenants living in the block the consultation was a Statutory Section 105 consultation under the 1985 Housing Act. The consultation was originally due to conclude on 24 August 2021 but due to a delay in posting the information online the consultation deadline was extended to 26 August 2021. Residents were notified of this extension during the consultation.

6.13. In order to ensure that all residents were able to access the consultation, the following methods were used:

- A letter and information pack were sent to all households in the block. Residents were able to request this in other languages where necessary and large print and braille versions were available upon request.

- The information was set out on the Broadwater Farm section of the Council's website and the Section 105 webpage. They were also able to complete the consultation online.

- Residents received phone-calls and in-person visits from the Council's engagement team on three separate occasions to discuss the options and go through the questionnaire.

- Details of the Independent Tenant and Leasehold Advisor were provided should tenants or leaseholders wish to obtain advice outside the council.

- A reminder flyer was sent to the 21 eligible households two weeks prior to the consultation closing date, to remind them of how to respond, advertise the ITLA details and remind them of the details of the BWF engagement officer.

6.14. To ensure that it was easy for residents to voice their opinions in the consultation, they were able to:

- Return the questionnaire and booklet with their views using a freepost envelope that was provided to all households.

- Voice their opinion to a dedicated email address.

- Voice their opinion via a dedicated phone number.

- Give their feedback directly to one of our rehousing or engagement officers.

Summary of the results of the consultation with Stapleford North residents

6.15. 21 households (100% of eligible residents) responded to the consultation. A detailed consultation feedback report was appended in Appendix one to the September 2021 Cabinet decision relating to the consultation. This report provided detailed feedback received from residents and was considered by Cabinet as part of the decision to include Stapleford North in the final design proposals.

6.16. A summary of the headline responses is as follows:

- 21 residents (100%) gave a preference.
- 8 residents (38% of responders) preferred option one to retain and refurbish the block.
- 13 residents (62% of responders) preferred option two to demolish and replace the block.

6.17. Following the Section 105 consultation, Cabinet approved a recommendation to 'Authorise the inclusion of the demolition and reprovision of Stapleford North wing (flats 25-36 and 61-72) on Broadwater Farm in the 'preferred design scenario' and subsequent resident ballot.'

6.18. This decision meant that the final design proposals presented to the community in the resident ballot included the demolition and reprovision of Stapleford North.

The Ballot

6.19. Following the outcome of this consultation, in December 2021 Cabinet approved a report which set out in detail the proposals for new homes (including the demolition and reprovision of Stapleford North) and other improvements to the Broadwater Farm estate and gave authorisation to present these proposals to residents of the estate in a resident ballot.

6.20. This ballot was carried out between 11 February 2022 and 7 March 2022 in accordance with the Greater London Authority's (GLA) guidelines, overseen by Civica Election Services. Residents were provided with the full proposals for new homes and estate improvements in the Landlord Offer and asked to vote 'yes' or 'no' to the following question:

'Do you support the redevelopment proposals within the Broadwater Farm estate as set out in the Landlord Offer?'

6.21. Out of 1073 eligible voters, 590 (55%) voted in the ballot. 502 (85.1%) voted 'yes' in favour of the proposals and 88 (14.9%) voted 'no'.

6.22. This report therefore seeks authorisation for the rehousing of residents in Stapleford North and subsequent demolition of the block to enable the delivery of the final design proposals.

Broadwater Farm Rehousing and Repayments Policy

6.23. To enable the rehousing to take place in accordance with the policies agreed by previous decisions, this report seeks approval for the extension of the Broadwater Farm Rehousing and Payments Policy for the purpose of rehousing the residents of Stapleford North.

6.24. Further to this, in the Section 105 consultation materials and the July 2021 Cabinet report it was noted that any rehousing as a result of demolition – in the event of a 'yes' vote in the resident ballot – would be undertaken using the Broadwater Farm Rehousing and Payments Policy.

6.25. Under this policy, the Council aims to rehouse all secure council tenant households based on their need and, where possible, their rehousing preferences. All displaced secure tenants and resident leaseholders would have the right to return to a new home on the Broadwater Farm Estate.

6.26. Residents will also be supported by rehousing officers, who will undertake full needs assessments to determine their needs for their new properties. The process also makes access to the Choice Based Lettings system available for secure tenants and ensures they get priority for moves.

6.27. Of the 17 tenanted properties, the Council are aware that several are over-crowded, meaning that the rehousing under the Broadwater Farm Rehousing and Payments Policy (BWFRPP) would actively benefit these residents to find more suitable homes for their needs.

6.28. In addition to rehousing the secure tenants in the block, the Council will need to acquire the three resident leaseholder and one non-resident leaseholder properties in Stapleford North.

6.29. The BWFRPP contains important provisions for leaseholders to enable these acquisitions. The policy ensures that they have affordable options to acquire new homes, including through access to equity loans.

6.30. Once the new homes are built, resident leaseholders will be offered the opportunity to return to the estate by acquiring one of the new homes and would be able to access the Council's shared equity loan to enable this.

6.31. A copy of the existing policy can be found at appendix 1 to this report.

Enhanced leaseholder policy

6.32. In July 2020, Cabinet enhanced the offer made to leaseholders being rehoused from the Tangmere and Northolt blocks on Broadwater Farm.

6.33. Making provisions for leaseholders to swap their leasehold interest for a Social Tenancy elsewhere, subject to compensation equivalent to 25% of their properties value, subject to approval by the discretion panel.

6.34. This enhanced policy is intended to give vulnerable leaseholders more options when being rehoused, ensuring that disruption is minimised to these residents. It is also intended to maximise flexibility for the Council in making offers to leaseholders, to ensure that the interests can be acquired in a timely fashion and in accordance with the aspiration to demolish Northolt in 2024.

Land Assembly Strategy and Compulsory Purchase Order (CPO) Powers Available

6.35. The Council's principal and preferred method of acquiring land is through negotiation and private treaty acquisitions with individual leaseholders. In this respect, negotiations will commence as soon as possible with leaseholders following the approval of this report.

6.36. Should the Council fail to acquire the sites by private treaty then consideration will be given to the Council exercising Compulsory Purchase Order (CPO) powers in the future as a last resort. In advance of making a CPO, the Council will need to demonstrate reasonable attempts to acquire the land by agreement. A decision to implement a CPO would be the subject of a separate Cabinet decision, setting out the justification within CPO guidance.

6.37. Government guidance on the use of CPO advises that where it is considered likely that a CPO will be required, that it is acceptable to start the preparation in tandem with undertaking negotiations.

6.38. Legal advice suggests that a minimum of 18-24 months should be allowed for the compulsory purchase process from the start of preparation work to taking vacant possession of the site. To ensure the programme is kept on track and costs are kept within the current budget, officers will start work preparing for a possible Cabinet decision regarding CPO powers from June 2022.

6.39. The Council would not make a decision on whether to make an application to DHLUC for the use of CPO powers until January 2023 at the earliest and depending on the progress made in acquiring the interests by mutual agreement. This will only be used as a last resort, should it become clear that the impact of acquisitions will hinder the Council's ability to deliver on the agreed scheme within budget and on programme. As the scheme represents both a qualitative and quantitative improvement to the council housing stock on the estate, the impact of delays would be significant for those who wish to return to the estate and the wider neighbourhood who are set to benefit from the new homes and estate improvements.

Cost of rehousing and acquisitions

6.40. This report notes that an estimated sum of £151,750 will be used for the purpose of rehousing all secure tenants.

6.41. The estimated sum for the acquisition of leasehold interests are set out in the exempt Part B of this report to undertake buybacks from the leaseholders in this wing block.

7. Contribution to strategic outcomes

7.1. Haringey's Borough Plan 2019-2023, outcome 1: objective A to 'deliver as many new, good quality homes of all kinds as we can, in good quality neighbourhoods.'

7.2. Haringey's Borough Plan 2019-2023, outcome 3: objective A to 'improve the quality of Haringey's Council housing, including that a minimum of 95% of homes meet the Decent Homes Standard by 2022.'

7.3. Haringey's Borough Plan 2019-2023, outcome 3: objective D to 'ensure safety in housing of all tenures across the borough, responding to new regulations as they emerge.'

7.4. Haringey's Borough Plan 2019-2023, outcome 10: objective A to 'provide safe and accessible public spaces for everyone, especially children, young people, and people with disabilities.'

7.5. Objective 4 of the Haringey Housing Strategy 2017-2022 identifies that a key priority is to "Provide stable, safe well-managed homes in decent environments". Ensuring that all residents live in safe homes is essential to delivering this priority.

8. Statutory Officers comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

8.1. **Finance**

8.2. This report sets out recommendations relating to the demolition of Sapleford North Block, the rehousing of tenants and leaseholders in the block; and acquisition of 4 leasehold units in the block.

8.3. The additional costs associated with the rehousing of secure tenants is already budgeted for. There is provision in the approved BWF Capital programme budget for all costs in relation to this report.

8.4. The cost of demolition of Stapeford North block (£600,000) is an estimate based on demolishing it alone (single block).

8.5. A further report will be brought to cabinet dealing with the procurement and costs of demolition of Stapleford North and Northolt Blocks once the procurement route has been agreed.

8.6. Further finance comments are contained in the exempt report.

8.7. **Procurement**

8.8. Strategic Procurement note the content of the report. There are no current procurement consideration for this report. Strategic Procurement will work with the service area to support the future procurement of the demolition contractor.

8.9. **Head of Legal & Governance**

8.10. The Head of Legal & Governance has been consulted in the drafting of this report.

8.11. S105 of the Housing Act 1985 requires that secure tenants be consulted on these proposals; while there is (at this stage) no statutory requirement to consult with leaseholders, it is the council's practice to do so.

8.12. Compliance with the Council's published arrangements (the "Arrangements") for consultation with secure tenants is set out in the body of the report.

8.13. In making its decision Cabinet must conscientiously take into account the outcome of the consultation, and be satisfied that the consultation adhered to the other "Sedley principles", namely:

(1) That consultation was at a time when proposals are still at a formative stage;

(2) That sufficient reasons were given for any proposal to permit of intelligent consideration and response;

(3) That adequate time was given for consideration and response

8.14. Cabinet must also be satisfied that its decision is compatible with tenants' and leaseholders' human rights under the European Convention. The demolition of each block will necessarily require the prior ending of secure tenants' tenancies and leaseholders' leases (subject to the possible need for compulsory purchase) and will impact upon the following Convention rights in particular: Article 8 (right to respect for private and family life); Article 1 Protocol 1 (protection of property).

8.15. The Convention Rights are each qualified; that is, there is a balance to be struck between the Convention Right and other interests and rights. Any restriction on the exercise of the right must be in accordance with the law, and in the public interest.

8.16. The public interests to be taken into account in considering Article 8 rights include, in particular, public safety.

8.17. The public interests relevant to Article 1 Protocol 1 rights include in particular the right of the authority to control the use of property in accordance with the general interest

8.18. Cabinet must also take into account the issues raised by the Equalities Impact Assessment and the comments under the head of "Equality" below.

8.19. The Head of Legal and Governance sees no legal reasons preventing Cabinet from approving the recommendations in the report.

8.20. **Equality**

8.21. The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share those protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not.

8.22. The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

8.23. The block contains 17 secure tenants, four leaseholders, two unauthorised occupants, and one vacant property. The residents in this block are disproportionately from older age groups, BAME backgrounds, and lower socio-economic households.

8.24. Due to structural damage, the building either must undergo repair work or be demolished and replaced; Haringey Council put this decision to residents in a Section 105 consultation and subsequent resident ballot. In the S105 consultation, sixty-two per cent of the 21 respondents supported plans to demolish and replace this block. In the resident ballot, eighty-five per cent of estate residents who voted supported proposals which included the demolition and reprovision of Stapleford North.

8.25. The Council recognises that individuals within this block are likely to face significant short-term disruption to their lives through rehousing. There will likely be a disproportionate impact on those with protected characteristics, including, for example, elderly residents, those with disabilities, or parents with young children. However, it is necessary to undertake works to address the structural faults, and the resident of the block voted for demolition and replacement over repairs. The current Residents will be positively impacted in the long-term as they will be living in safer properties, and secure tenants will be placed in Band A for rehousing. They will also have a Right to Return to brand new council homes on the estate. Further, there will be benefits to the whole Broadwater Farm community – who are disproportionately (compared to borough averages) from BAME backgrounds, older sections of the population, and lower socio-economic backgrounds.

8.26. The Council will also put measures to mitigate the potential negative impacts on those with protected characteristics. These include the Broadwater Farm Rehousing and Payments Policy and rehousing support so that whenever possible, residents can remain in the local area minimising disruption to schooling, medical needs, and cultural/community ties. These specific mitigations have been outlined in the associated equalities impact assessment (EQIA).

9. Use of Appendices

Appendix 1 - Broadwater Farm Rehousing and Payments Policy:
https://www.haringey.gov.uk/housing/housing-strategies-policies-and-plans/broadwater-farm-rehousing-and-payments-policy

Appendix 2 - Social tenancy policy for leaseholders:
https://www.minutes.haringey.gov.uk/documents/s116868/Cabinet%20report%20July%202020%20leasehold%20acquisition%20Appendix%20ONE%20mg%20FINAL.pdf

Appendix 3 - Broadwater Farm Local Lettings Plan:
https://www.minutes.haringey.gov.uk/documents/s104900/Appendix%203%20Local%20Lettings%20Policy.pdf

Appendix 4 – Equality Impact Assessment

10. Local Government (Access to Information) Act 1985

- **July 2021 – Cabinet report to proceed with S105 consultation of Stapleford North residents.**
  https://www.minutes.haringey.gov.uk/documents/s125433/Stapleford%20North%20Cabinet%20final.pdf
- **September 2021 – Cabinet report to consider the responses to the S105 and proceed with plans to demolish Stapleford North (subject to positive ballot outcome).**
  https://www.minutes.haringey.gov.uk/documents/s126403/S105%20consultation%20cabinet%20report%20v9.pdf
- **December 2021 – approval of the 'preferred design scenario' and decision to proceed to the resident ballot.**
  https://www.minutes.haringey.gov.uk/documents/s128342/Cabinet%20Report%20-%20Broadwater%20Farm%20-%20FINAL%20VERSION.pdf

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Broadwater Farm Re-housing and Payments Policy

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1 INTRODUCTION

1.1 When will this policy apply and who does it affect?

1.1.1 This policy applies to secure tenants and resident leaseholders (together "residents") of Tangmere and Northolt (together "the blocks") required to move permanently, as a result of the structural defects identified to those blocks.

1.1.2 Non-resident leaseholders will not be offered any rehousing but will be eligible for payments when they have sold their property to the Council.

1.1.3 This policy does not apply to tenants of non-resident leaseholders. They will instead receive advice and support to find a new home, and will be eligible to approach the Council as homeless if they are unable to do so.

1.1.4 For the purpose of this policy, a resident leaseholder is defined as a leaseholder who resided in one of the blocks as at 26 June 2018.

1.1.5 This policy applies to all secure tenants and leaseholders of Northolt and Tangmere, to former Tangmere secure tenants who have moved since 26 June 2018 under the provisions of the Tangmere Rehousing Priority Scheme and to all leaseholders resident on that date who have moved under those provisions. This policy replaces and extends that Scheme.

Rehousing

1.1.6 This policy provides for rehousing of affected residents. The affected residents will have a dedicated rehousing officer who will provide help and support throughout every step of the move process. This will include additional support such as packing and un-packing services for elderly or vulnerable residents.

1.1.7 Where there is a need for a household to move to a different part of the borough, Homes for Haringey staff will work with households and provide support if new arrangements to access public services such as healthcare and education need to be made. Financial assistance will also be provided to cover the costs of moving home as described in this policy.

Payments

1.1.8 The policy provides for Home Loss and disturbance payments to residents in the blocks required to move permanently because their home will be demolished.

1.1.9 It also provides for Basic Loss payments to non-resident leaseholders who choose to sell their flats back to the Council if their block is to be demolished.

1.2 Policy context

1.2.1 The policy incorporates some of the Council's existing policies and explains how these will be applied.

1.2.2 Two existing policies which have been previously been subject to consultation and have been approved by Cabinet are particularly relevant. These policies are;

- **Housing Allocation Policy 2015**

This policy sets out how Council and Housing Association rented properties are allocated, including the priority given to each household and the size of accommodation they will be offered.

- **Estate Renewal Rehousing and Payments Policy**

This policy sets a baseline offer of rehousing and payments to tenants and leaseholders where they are required to move because their estate is subject to a renewal scheme.

The ERRPP is based on three guiding principles
- No tenant or leaseholder will be financially worse off
- All Tenants and Resident Leaseholders will have a Right to Return
- All Tenants and Resident Leaseholders who wish to move will be supported to do so.

Where possible, the Council is committed to honouring these commitments.

1.2.3 This policy also refers to other policies such as the Council's Under-Occupation payments policy which sets out payments for households downsizing to smaller homes.

1.2.4 Links to each of these policies can be found in Appendix 1. Copies of these policies can be made available on request.

2 REHOUSING OFFER TO TENANTS

2.1 Initial meeting and Need Assessment

2.1.1 The Council aims to rehouse all households based on their need and where possible, their rehousing preferences. To enable this for Northolt tenants, tenants will have access to the Choice Based Lettings scheme for an initial period to be determined by the Director of Housing, Regeneration and Planning ("Initial Period"). At the end of the Initial Period, any tenants remaining in Northolt will be made Direct Offers of alternative accommodation. To establish each household's rehousing needs and preferences, a dedicated Rehousing Officer will meet with each household. Given the urgency to move tenants from Tangmere, Choice Based Lettings will not apply to any secure tenants remaining in Tangmere at the implementation of this policy. They will be made Direct Offers.

2.1.2 At this meeting the rehousing officer will ensure that the household understands the process and the support that is available to them. The Rehousing Officer will also seek to establish each household's needs through completing a needs assessment form. The Rehousing Officer will also ask

households to state any preferences they may have for their new home such as:

- The location and landlord

- Whether they wish to be considered for an offer of an alternative flat on the estate matching their housing need either at the time of the move, or at a later date when a suitable property becomes available.

2.1.3 The preferences made by each household will affect how quickly a new home can be found if a Direct Offer is used and the Council will be under no duty to meet preferences where a suitable home is unlikely to become available quickly enough.

2.1.4 Residents should be aware that the Council will not rehouse unauthorised occupants, sub-tenants, lodgers, licensees, other non-secure occupants and persons included on applications for rehousing but who are not considered to be part of the tenant's household. However, the Council will offer Housing Advice to these households to assist them to find another home quickly.

2.1.5 In cases of fraudulent applications, the Council will consider what sanctions might be pursued.

2.2 What properties will be offered?

2.2.1 Northolt tenants will be able to bid for and/or receive Direct Offers of new homes on the basis of their housing need which is set out in Section 8 of the Housing Allocation Policy (see Appendix 2). Rehousing of any secure tenants remaining in Tangmere will continue to be by Direct Offers only.

2.2.2 Properties which meet specialist needs, such as mobility requirements, will, in the first instance, only be offered to households with these needs.

2.2.3 It is likely that most residents will move to another Council property and so will be charged a Council rent. However, the rents and charges in their new home will be the standard charges for that particular property and so may differ from the charges of their existing home.

2.3 Remaining Tangmere tenants who are under-occupying their current home

2.3.1 Under the current Housing Allocations Policy, tenants who are willing to transfer to a smaller property and who have more than one spare bedroom will be able to retain spare bedroom(s). This scheme is available to all under-occupying tenants across the borough and will continue to apply to remaining Tangmere tenants who permanently move to a smaller home elsewhere in the borough.

2.3.2 This offer will not apply where the Council is required to take legal action, such as the enforcement of notices to recover the property.

2.3.3 In addition to the payments set out in section 3, tenants who move to a smaller property in or outside the Broadwater Farm Estate will also be entitled to financial incentives for each room they are giving up. Tenants will be offered £1,000 for downsizing plus a further £1,000 for each bedroom given up. However, this payment will not be made for temporary moves until and unless a decision is made to demolish the tenant's original home or where the tenant has decided to remain in their new home.

2.4 Where will the new property be located and who will be the new landlord?

2.4.1 In the Initial Period, Northolt tenants will be able to choose the location and landlord of the homes they bid for. For any remaining Tangmere tenants, and any Northolt tenants who have been unsuccessful at the end of the Initial Period, or who have requested a Direct Offer, the Council will seek to rehouse tenants in an area and with the landlord they have chosen where this is possible consistently with the urgency of the situation. Where this is not possible the Council will be under no duty to meet tenants' preferences.

2.5 How will new homes be offered?

2.5.1 Given the need to move Tangmere tenants as quickly as possible, all offers to them under the Tangmere Rehousing Priority Scheme were made by a Direct Offer As this urgency continues, any further offers to any Tangmere tenants remaining in the block will continue to be made on a Direct Offer basis.

2.5.2 In contrast, the rehousing of Northolt tenants is less urgent. Northolt tenants will therefore be given access to the CBL system to select their new home in the Initial Period. However, the Council may also assist households with a Direct Offer where this is requested by the tenant or where this would be the most effective method to allocate property suitable to their needs.

2.5.3 During the Initial Period, Northolt tenants will be given Band A priority with an application date set to the date their BWF tenancy started.

2.5.4 At the end of the Initial Period (and also for any remaining Tangmere tenants) the Council will make Direct Offers to those households who have not found a new home using this system. These Direct Offers will represent the tenant's final offer at this stage and tenants of Northolt will not be able to bid for further homes through the Choice Based Lettings Scheme. Tenants receiving and accepting Direct Offers under this paragraph will however be entitled to a second move under 2.8 below

2.5.5 Households matched to a property through a Direct Offer will receive an Offer Letter inviting them to view the property, though they may also receive a phone call and/or email to minimise any delays.

2.6 Right to review

2.6.1 Only one Direct Offer of 'suitable accommodation' will normally be made. If the offer is refused, the tenant is entitled to request a review of the suitability

of the accommodation offered. A further offer will only be considered if the review decision is that the offer is unsuitable.

2.6.2 The request for a review must be made within 7 days of the offer, and the Council will make a review decision within 14 days thereafter

2.6.3 The Review will otherwise proceed as set out in paragraph 13.3 of the Allocations Policy (see Appendix 3).

2.6.4 If a review confirms the suitability of the offer, in the absence of exceptional circumstances, the Council may commence possession proceedings to ensure vacant possession of the property within a timely fashion to permit the vacation of the block to allow demolition to proceed.

2.7 Who will get priority for Direct Offers?

2.7.1 It is anticipated that most Northolt tenants will find a new home using the CBL system during the Interim Period. However, where Northolt tenants have been unable to do so, or have refused offers, and for any remaining Tangmere tenants, the Council will review available properties and allocate them to remaining tenants. In many cases, each property will be suitable for more than one household and so any offers or viewings will be made in order of priority as set out below.

Priority 1:	Those who are vulnerable, who have specialist needs such as mobility requirement, or who have an additional needs or medical equipment which would create a risk.
Priority 2:	Where a preference for a local home has been made, those who have a member of the household attending a local school, or have support services only available in the local area or those who are working locally. “Local” and “locally” are taken to mean within N17/N22 postcodes),
Priority 3:	All other households

2.7.2 Should a property be suitable for more than one household with the same priority, then the property will be offered to the household with the earliest start date to their tenancy on the estate. Tenancies elsewhere will not count toward priority.

2.7.3 The start date for those who succeeded to their tenancy will be the start date of the original tenancy at that address.

2.8 Second Moves

2.8.1 Following a tenant’s initial move away from the estate under 2.1-2.7 above, the tenant will be eligible for a “second move” through the Choice Based Lettings system. Tenants will be given Band A priority for their ‘second move’

and will be eligible to bid for properties which meet their Housing Need at the time.

2.8.2 'Second moves' will be available to all tenants and former tenants of Northolt and Tangmere including those who have previously moved through the Tangmere Rehousing Priority Scheme. 'Second moves' will be available regardless of whether the first move was through a direct offer or Choice Based Lettings.

2.8.3 Tenants will only be eligible for one "second move". Eligibility for a second move will end at the point at which the Right to Return ends as set out in 3.1.4.

2.8.4 Tenants taking up this offer of a 'second move' will receive financial help with the move in the form of disturbance payments set out in 4.3 below, but will not receive a second 'Home Loss' payment

3 THE RIGHT TO RETURN

3.1 Right to Return for Secure Tenants

3.1.1 Tenants will have two Rights to Return;

a) Tenants will have the Right to Return to the Broadwater Farm Estate, to a suitable vacant property if one becomes available

b) The Right to Return to a replacement home built on the estate on the site of Tangmere or Northolt.

3.1.2 Any offer to return to a replacement home will end both Rights to Return. However, tenants who refuse or accept an offer to return to a vacant home on the estate will retain the Right to Return to a newly built replacement home.

3.1.3 Offers made under the Right to Return will be made on the basis of the household's Housing Need at the time of the offer.

3.1.4 Tenants will retain the Rights to Return until one of the following has occurred;

- The tenant has informed the Council that they do not wish to return to the estate.
- The tenant has refused an offer of a suitable newly built replacement property on the Broadwater Farm Estate.
- The tenant's tenancy at their new home (or any replacement) has been ended.

3.1.5 The tenant's Right to Return to a vacant flat on the estate will be ended if the tenant refuses an offer of a suitable accommodation on the estate. Refusal of an offer of a suitable vacant home will not affect the tenant's Right to Return to a newly built home.

3.1.6 Tenants will only be entitled to one offer under each Right but may request a review of that offer as set out in 3.2 below.

3.1.7 Households who are awaiting an offer under either Right to Return will be made a suitable offer on the estate as they become available. These homes will be offered on the basis of Housing Need, as set out in the Housing Allocations Policy in force at the time of the offer. Priority will be given as described in section 2.6 above.

3.1.8 Tenants returning will receive financial help with the move in the form of disturbance payments set out in 4.3 below, but will not receive a further 'Home Loss' payment.

3.2 Right of review

3.2.1 Only one Direct Offer will normally be made. If the offer is refused, the tenant is entitled to request a review of the suitability of the accommodation offered. A further offer will only be considered if the review decision is that the offer is unsuitable. The Review will proceed as set out in paragraph 13.3 of the Allocations Policy (see Appendix 3).

3.2.2 In exceptional cases requests to go beyond the policy may be considered by the Broadwater Farm Discretion Panel.

3.3 Right to Return for Resident leaseholders

3.3.1 The Estate Renewal Rehousing and Payments Policy also offers resident leaseholders a Right to Return to a newly built replacement home on the estate.

3.3.2 On completion of the new homes, former resident leaseholders will be offered a property with the same number of bedrooms as their previous BWF home unless there has been a significant change in their circumstances.

3.3.3 Significant changes include (but are not limited to) where the leaseholder:

- No longer owns the property they live in and/or no longer has assets to invest and/or released a significant proportion of their original assets.
- Has since downsized to a smaller property

3.3.4 Where there have been significant changes, any request to return will be assessed by the Discretion Panel. While the panel is expected to be sympathetic to cases where the former BWF resident leaseholder does not meet these criteria, offers will be in line with those envisaged by the general principles of the Estate Renewal and Rehousing Policy. Offers are unlikely to be made where additional finance is unwarranted.

3.3.5 Leaseholders who wish to take up this offer will be required to invest the value of their home at the time of the offer. Leaseholders will be eligible for an Equity Loan where needed regardless of whether they have previously taken

up this offer. Details of the Equity Loan are set out in 5.3 below and in Appendix 4.

3.3.6 No further Home Loss payments will be made for returning moves. Returning Leaseholders will not be expected to invest the value of their Home Loss which was paid when the Council purchased their original BWF home which would normally be required for an Equity Loan.

3.3.7 To enable a resident leaseholder to return, the Council will pay the same Disturbance costs and Additional Payments as set out in 4.2 and 4.5 below.

4 PAYMENTS MADE TO TENANTS AND RESIDENT LEASEHOLDERS

4.1 Available payments

4.1.1 As the Council has decided to demolish both blocks and replace them with new homes. The Council's Estate Renewal and Rehousing Policy will therefore apply.

4.1.2 Payments potentially available will be:

- Disturbance Payments
- Market value (of leaseholder property)
- Home Loss payments
- Basic Loss Payments
- Under-occupation payments
- Additional Payments

Disturbance Payments – payments to tenants and resident leaseholders to cover the costs of moving home.

Market Value- payments by the Council to purchase the leasehold interest of leaseholders

Home Loss Payments – payments to secure tenants and resident leaseholders to compensate them for the permanent loss of their home:

- To tenants – a flat rate payment, currently £6,300
- To resident leaseholders – a payment of 10% of the value of the property with (currently) a minimum of £6,300 and maximum of £63,000

Basic Loss Payments – payments to non-resident leaseholders to compensate them for the permanent loss of their property. Calculated at 7.5% of the value of the property with a maximum of £75,000

Under-occupation payments – See section 2.3 above for details of what these cover and when they will be paid

Additional Payments to Resident leaseholders – these payments cover the legal and other costs of selling their existing flat and buying a new one

4.1.3 If the leaseholder does not accept the valuation agreed between their valuer and the Council's valuer, or the valuation following any dispute resolution, they will be determined to have rejected the Council's offer to buy by agreement. They will in these circumstances have the statutory right to have the matter referred to the Lands Chamber of the Upper Tribunal.

4.2 Disturbance Payments

4.2.1 Moving home can be costly and the Council is seeking to make sure that tenants do not incur any reasonable additional costs because of the move.

4.2.2 Examples of costs which might be considered reasonable include:

- Removal costs from the current home to the new home.
- Redirection of mail for each authorised surname living at the address.
- Telephone and internet disconnection and reconnection.
- Disconnection of any television aerials or satellite dishes
- Washing machine, cooker, dishwasher and plumbed fridge disconnection
- Any extra costs of new school uniform if moving to a different area
- Dismantling and re-fitting of fitted resident owned furniture (such as kitchen units and wardrobes
- Reimbursements for wage or salary loss on the day of the removal

4.2.3 Secure Tenants can also claim the following costs:

- Home improvements that have been notified and approved by the Council, less the cost of depreciation. Receipts are not required, but the improvement must have been approved by the Council, as improvements carried out without the Council's consent could amount to a breach of tenancy.

- Where the costs of adaptations in the old home were previously met by a tenant, the Council will reimburse the tenant subject to relevant receipts being available.

4.2.4 Further detail is provided in para 5.2 of the Estate Renewal Rehousing and Payments Policy.

4.2.5 These payments will be made directly to the tenant or leaseholder, and will only be made in respect of one replacement property on any move. These payments will however be made for each move the tenant or leaseholder is required to make.

4.2.6 Tenants/leaseholders are offered two payment method options:

- A Claim Option where the tenant/leaseholder submits a Disturbance Payment claim form for any legitimate expenses with receipts or proof of expenses

- A Fixed Payment Option where tenants/leaseholders receive a fixed sum payment instead of claiming for each expense. Payments are based on property size;

1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms
£1,650	£2,000	£2,400	£2,780

4.3 Home Loss payments to secure tenants

4.3.1 These statutory payments are made when a decision is made to demolish a secure tenant's home. These payments are set annually by the Government and currently stand at £6,300 per tenancy.

4.3.2 Home Loss payments have been offered to all Tangmere tenants on a discretionary basis prior to the decision to demolish and, following the decision to demolish Northolt, these payments will also be available to all secure tenants in Northolt. These payments will apply to all Secure Tenants in these blocks regardless of how long they have been resident in Broadwater Farm.

4.3.3 Payments will normally be made only after the clearance of and return of the return of keys to the property the tenant is vacating. All arrears will normally be offset against any Home Loss payment. This includes rent arrears for tenants. Deductions may also be made for any Council Tax arrears.

4.4 Home loss and Basic Loss payments to resident and non-resident leaseholders respectively together with Market Value,

4.4.1 The Council will purchase the flats of any leaseholders affected at Market Value.

4.4.2 Resident leaseholders will also receive a Home Loss Payment in addition to market value which is equivalent to 10% of the value of their home (with a minimum currently of £6,300, and a maximum currently of £63,000).

4.4.3 Non-resident leaseholders will receive a Basic Loss Payments in addition to market value which is equivalent to 7.5% of the value of their home (with a maximum of £75,000).

4.4.4 These payments will normally be made only after the return of keys and the sale completion. All arrears will normally be offset against any Home Loss payment. This includes service charge or major works arrears for leaseholders. Deductions may also be made for any Council Tax arrears.

4.5 Additional payments

4.5.1 Resident leaseholders are also entitled to an Additional Payment.

4.5.2 Additional Payments can include:

- Early mortgage redemption fees at the existing property
- Conveyancing costs
- Mortgage and lender fees arising from the purchase of a replacement property
- Stamp duty land tax arising from the purchase of a replacement property
- Solicitor/legal fees arising from the purchase of a replacement property

- In some cases, payment for replacing white goods or furnishings owned by the leaseholder where the existing white goods/furnishing do not fit into the new property
- Removal and reinstatement of disabled adaptations as agreed by Haringey Council's Occupational Therapist

4.5.3 Emergency payments may be made available to those who will need this payment to secure a new home.

Additional Payments are only available to assist purchase of a replacement home within the United Kingdom.

5 REHOUSING OPTIONS FOR LEASEHOLDERS

5.1 Purchase on the open market

5.1.1 If the leaseholder uses the payments received to buy a new property on the open market in the United Kingdom, they will receive Additional Payments as set out above at paragraph 4.5. They may however wish to take up one of the further options outlined below.

5.2 Additional options

5.2.1 Leaseholders who reside in one of the blocks, as 26 June 2018 may qualify for additional assistance from the Council.

5.2.2 Practical non-financial help may be provided in buying another property outside Haringey. This will be limited to information on how to purchase a property on the open market such as finding solicitors, surveyors etc.

5.3 Equity Loan

5.3.1 Resident leaseholders who wish to remain in the borough but who cannot afford to purchase a new property outright may be able to buy a new property within the borough using an Equity Loan from the Council. Details of this scheme are set out at Appendix 4

5.3.2 Unlike a mortgage, these loans do not attract any interest and will only need to be repaid when the property is sold or transferred to another owner unless the property is inherited by the leaseholder's spouse, civil partner or a person living with them as their husband or wife.

5.3.3 Equity Loans will be available to fund up to 40% of the leaseholder's new home in the borough where the leaseholder invests the whole of the Market value and Home Loss Payment received on sale of their flat to the Council.

5.3.4 These loans are being made available primarily to help those who would not be able to purchase a home off the estate without the loan – they are not intended to help purchase more expensive properties off the estate or to be used to fund very high value properties. There is therefore a double cap on the value of the replacement home. That is, the maximum value of the replacement home cannot be higher than the lower of the following two criteria:

- Where the total of the Market Value and Home Loss Payment equals 60% of the value of the new property being purchased. This is equivalent to the new home being a maximum of 1.83 times Market Value of the current home.
- The borough-wide upper quartile house price. The most recent published value is £637,250 as reported by the GLA in August 2017.

5.3.5 While the leaseholder may contribute any other capital or savings, these additional funds can only be used to reduce the size of the Equity Loan and cannot be used to purchase a higher value property.

Ownership and responsibilities

5.3.6 The leaseholder is responsible for repairs, service charges and all other costs associated with the new property, but there is no interest payable on the Equity Loan.

5.3.7 Under the Equity Loan arrangement, the leaseholder will be the sole legal owner and is able to sublet the property subject to the usual requirements to notify the freeholder or any other relevant terms in the lease.

Repayment of the Equity Loan and Sale

5.3.8 The leaseholder may at any time repay part of the Equity Loan at any time. In order to do so a new valuation of the property will need to be obtained and each partial repayment of the loan must be for at least 10% of the property's current value. This valuation, and any associated administrative costs, will be the responsibility of the leaseholder.

5.3.9 The Equity Loan only needs to be repaid upon sale of the property or other transfer to another owner unless under the inheritance provisions below. Any increase or decrease in the value of the property will be apportioned between the leaseholder and the Council or its appointed agent in line with their original contributions and any staircasing, which are calculated as percentages.

5.3.10 Prior to any sale the Council or its appointed agent will require a further valuation to be obtained so that the amount that is due to be repaid to the landlord can be calculated. This will be at the expense of the leaseholder along with all associated administrative costs connected with the sale.

Inheritance and death of the leaseholder

5.3.11 Following the death of the leaseholder, the Equity Loan will need to be repaid when the property is transferred to another owner unless the property is inherited by the leaseholder's spouse, civil partner or a person living with them as their husband or wife. The partner may take a transfer of the property without having to repay the Equity Loan, so long as the partner resided at the home with the leaseholder at the time of the leaseholder's death.

5.3.12 Succession by a partner without repayment of the Equity Loan can take place on any property located in the borough, but can only take place once. This

offer will be subject to the partner being able to retain at least a 60% equity share of the property's value at that time (for example, being able to maintain payments on any mortgage funding that share). Surviving partners who are unable to fund a 60% share may be offered a Shared Ownership arrangement as described in the Estate Renewal Rehousing and Payments Policy.

APPENDIX 1 – Links to other documents and policies

Estate Renewal Rehousing and Payments Policy
http://www.haringey.gov.uk/sites/haringeygovuk/files/estate_renewal_rehousing_and_payments_policy_2017.pdf

Housing Allocations Policy 2015 as amended 1 May 2017 & 14 March 2018
http://www.haringey.gov.uk/sites/haringeygovuk/files/haringeys_housing_allocations_policy_2015_amended_14_march_2018.pdf

Under-Occupation Incentives
http://www.haringey.gov.uk/housing/housing-options/under-occupation

APPENDIX 2 – Section 8 of the Housing Allocations Policy

8 TYPE OF PROPERTY OFFERED

8.1 Property size and household size

8.1.1 The Council, Homes for Haringey and Registered Providers will always aim to make best use of their housing stock.

8.1.2 When determining the number and ages of the people who may occupy a property, the Council will have regard to the bedroom entitlement set out in 8.7 below.

8.1.3 Sometimes the applicant with the highest priority may not be allocated a home if this would result in either overcrowding or under-occupation, or if it would not make best use of ground floor or specially adapted accommodation.

8.1.4 Properties that have level access will be prioritised for those applicants who have a very serious medical need (so are in Band 'A') and require such accommodation.

8.1.5 If the landlord agrees an applicant will be allowed to move into a home that is smaller than their needs, where this improves their situation. For example, if an applicant has 4 children and is entitled to a 4-bedroom home but is living in one with 2 bedrooms, their application for a 3-bedroom home may be considered.

8.1.6 Registered Providers may apply different standards. The Home Connections advert will confirm how many people can be accommodated.

8.2 Parents with 'staying access' to dependent children or shared residence orders

8.2.1 Applicants with a shared residence order or staying access for children are not automatically entitled to bedrooms for their children.

8.2.2 The general principle is that a child needs one home of an adequate size, and that the Council and Registered Providers will not accept responsibility for providing a second home for children.

8.2.3 In determining the size of accommodation required for a household, children from current or former relationships will only be counted as part of the household if they live with the applicant for more than 50% of the time. Suitable evidence must be provided, in the form of a Residency Order and a child benefit statement.

8.3 Parents with a dependent child who is in foster care or being looked after by the local authority

8.3.1 When assessing bedroom entitlement, the Council will only take into account children who are currently in foster care or being looked after by the local

authority if the Children & Young People's Service (CYPS) confirms that the children will be returned to the applicant when the applicant is rehoused in accommodation of a suitable size.

8.4 Support for fostering and adoption

8.4.1 When assessing bedroom entitlement, the Council will take into account the Children & Young People's Service's assessment of the requirements of prospective foster carers and adopters. This will not, however, result in any priority being given for overcrowding.

8.5 Applicants with a medical or social need for a larger property

8.5.1 Applicants can apply for an extra bedroom due to their medical or social needs. Their circumstances will be considered and evidence supporting the need for an extra room will be required.

8.6 Extra rooms for carers

8.6.1 If an applicant states that they need an extra room for a carer, the Council will carry out an assessment of the applicant's needs and decide whether or not an extra room is required. Due to the high demand for housing, such requests are only likely to be agreed in exceptional circumstances.

8.6.2 The Council's Adult Social Care service should be able to provide evidence of the need for a 'live in' carer and confirmation (where appropriate) that, if the support was not provided, the applicant would qualify for funding for a 'live in' carer.

8.6.3 Where the Council is satisfied that there is a need for a live-in carer who is not cohabiting with another member of the household, the household will be entitled to an additional bedroom.

8.6.4 To qualify for an additional bedroom for a carer, the applicant must demonstrate that this care is provided by someone who would not otherwise live with the applicant and that, if they are a relative or friend, they are in receipt of a Carer's Allowance.

8.6.5 In exceptional circumstances, an extra bedroom may be awarded where a substantial amount of specialist medical equipment has been installed in the home.

8.7 Guidance on bedroom entitlement

8.7.1 Although the assessment of applicants' bedroom entitlement is complex and based on a range of factors, the table on the next page provides guidance on how many bedrooms an applicant should have.

8.7.2 It should be noted that, if a member of the applicant's household is pregnant, this does not entitle them to an extra bedroom. Instead, their application will be amended on receipt of the birth certificate.

8.7.3 For the purposes of assessing the applicant's bedroom entitlement, adults under the age of 25 will be assessed as young people in accordance with the table below.

Household size	Lowest number of bedrooms needed
1 adult	Bedsit
2 adults living together as a couple	1 bedroom
Adults living together but not as a couple	1 bedroom each
1 adult (or 2 adults living together as a couple) with 1 child	2 bedrooms
1 adult (or 2 adults living together as a couple) with: ▪ 2 children of the opposite sex (both under 10); **or** ▪ 2 children/young people of the same sex	2 bedrooms
1 adult (or 2 adults living together as a couple) with: ▪ 2 children of the opposite sex (at least one aged 10 or over); **or** ▪ 3 or 4 children / young people of the same sex; **or** ▪ 4 children / young people (two male & 2 female); **or** ▪ 4 children / young people (3 of one sex & 1 of the other) – where at least one male and one female are aged under 10	3 bedrooms
1 adult (or 2 adults living together as a couple) with: ▪ 4 children / young people (3 of one sex & 1 of the other, where all of the former and/or the latter are aged 10 or over); **or** ▪ 5 or 6 children / young people of the same sex; **or** ▪ 5 or 6 children / young people (3 or 4 of one sex & 1 or 2 of the other);	4 bedrooms
1 adult (or 2 adults living together as a couple) with: ▪ 6 children / young people (three male & 3 female) – where all males and/or all females are aged 10 or over; **or** ▪ 7 or more children / young people.	5 or more bedrooms

8.8.1 Due to the shortage of family homes, very large families that are in urgent need of rehousing may prefer to be offered two separate properties, rather than bid for a property that is smaller than they need.

8.8.2 For this to happen, there must be an adult member of the household who is eligible for housing and is willing to hold the second tenancy. They must join the Housing Register and be rehoused after the original applicant, who will be offered alternative accommodation that is of a size that reflects the reduced size of their household.

APPENDIX 3 – Section 13.3 of the Housing Allocations Policy

13.3 Requesting a review of the suitability of an offer of housing

13.3.1 Under the choice based lettings scheme, there are generally no penalties for most applicants who refuse an offer of permanent accommodation. However, if applicants receive a direct offer and refuse that offer, their priority may be reduced and, if they are homeless and subject to 'auto-bidding', the Council's homelessness duty may cease if they refuse an offer of suitable accommodation.

13.3.2 Where an applicant refuses an offer of accommodation, the Council may ask them to complete a form to record the reasons why the property has not been accepted. This information will be used to monitor the lettings process and the standard of accommodation, and to inform future decisions on the way in which services are delivered.

13.3.3 If an applicant wishes to request a review of the suitability of an offer of housing or, if applicable, that the Council's duty has ceased, they must submit their request to the Council in writing within 21 days of the offer being refused. The Council will normally confirm, in writing, the outcome of the review within 56 days and, in its reply, it will describe any further rights of appeal that the applicant has if they are still not satisfied with the decision.

13.3.4 Where the Review Officer decides that the offer of accommodation was not suitable, any penalty that has been imposed (including the discharge of the Council's homelessness duty) will be cancelled:

- Applicants who have not accepted the offer will be entitled to another offer of accommodation (through choice based lettings, a direct offer or 'auto-bidding', as appropriate)

- Applicants who have accepted the offer and taken on the tenancy of that accommodation will be placed in Band A of the Housing Register and will be given an effective date that matches the date that they accepted the tenancy.

APPENDIX 4 – Section 6.3 of the Estate Renewal Rehousing and Payments Policy

6.3 Equity Loans

Resident leaseholders and freeholders who wish to remain in the renewal area, or borough, but who cannot afford to purchase a new property outright may be able to buy a new property with an Equity Loan from Haringey Council, the developer or a Housing Association. This offer is only open to those who are able to afford 60% of the full purchase price unless an individual scheme has offered a lower minimum percentage. It should be noted however, that total housing costs cannot be exactly replicated, as lender rates are subject to change. Utilities, ground rent and service charge costs may also be different at the new properties compared with the leaseholder's existing property.

Minimum percentages required for Equity Loans

The policy below has used an equity requirement of 60% to qualify for an Equity Loan. This percentage is the minimum requirement for all schemes where this policy applies. However, individual schemes may offer a lower minimum equity share which should be used in place of references to 60% in the text below.

The new property

New properties on the renewal scheme bought under this arrangement cannot have a greater number of bedrooms than the leaseholder's existing property unless the leaseholder finances the cost of any additional bedrooms themselves. The value of any additional bedrooms will be determined by taking the difference in value between the larger property the leaseholder wishes to purchase and the value of a comparable property which is the same size as the leaseholder's current property. The comparable property will be in the same location, condition and terms as the proposed larger property.

Leaseholder and freeholder contribution

Leaseholders are eligible for this option where they agree to contribute;

- The market value of the property of their current home, made up of any equity in the property, plus any outstanding mortgage, and
- Any Home Loss payment, ie 10% of the market value of the property being acquired, subject to the statutorily defined limit as outlined in section 4.

Portable Equity Loans

Equity Loans are available for properties in other parts of the borough. These loans are being made available primarily to help those who would not be able to purchase a home on the estate without the loan – they are not intended to help purchase more expensive properties off the estate or to be used to fund very high value properties. There is therefore a double cap on the value of the replacement home.

That is, the maximum value of the replacement home cannot be higher than the lower of the following two criteria:

- Where the value of the current property plus 10% Home Loss equals 60% of the value of the new property being purchased. This is equivalent to the new home being a maximum of 1.83 times the value of the current home.
- The borough-wide upper quartile house price. The most recent published value is £637,250 as reported by the GLA in August 2017 and will be updated every year.

Additional contributions

While the leaseholder may contribute any other capital or savings, these additional funds can only be used to reduce the size of the Equity Loan and cannot be used to purchase a higher value property. Equity Loans will not be available for the purchase of properties that are more expensive than these limits.

It should be noted that if the leaseholder's existing property was purchased using a mortgage, a further mortgage to at least the same value as the one held on the existing property being purchased by Haringey Council will need to be raised before (or at the same time as) the purchase of the new property can take place. Haringey Council and the independent financial advisor can assist leaseholders in finding a new mortgage.

The Equity Loan

Subject to the above maximum values and percentage contributions, and the investment of the value of the existing property plus Home Loss, the remaining proportion of the property will be funded by an interest free equity loan from Haringey Council, the developer or the Housing Association, which will be secured as a charge on the property.

Ownership and responsibilities

Properties bought using an Equity Loan are leasehold properties (similar to 'Right to Buy'), meaning that there is a lease for a fixed period of time, typically 99 years. The leaseholder is responsible for repairs, service charges and all other costs associated with the new property, but there is no interest payable on the equity retained by the provider.

The leaseholder is able to repay part of the Equity Loan at any time. In order to do so a new valuation of the property will need to be obtained and each partial repayment of the loan must be for at least 10% of the property's current value. This valuation, and any associated administrative costs, will be the responsibility of the leaseholder.

Under the Equity Loan arrangement, the leaseholder will be the sole legal owner and is able to sublet the property subject to the usual requirements to notify the freeholder or any other relevant terms in the lease.

Sale and Repayment of the Equity Loan

The Equity Loan only needs to be repaid upon sale of the property. Any increase or decrease in the value of the property will be apportioned between the leaseholder

and the landlord or its appointed agent in line with their original contributions and any staircasing, which are calculated as percentages.

Prior to any sale the landlord or its appointed agent will require a further valuation to be obtained so that the amount that is due to be repaid to the landlord can be calculated. This will be at the expense of the leaseholder along with all associated administrative costs connected with the sale.

Inheritance and death of the leaseholder

Following the death of the leaseholder, the Equity Loan will need to be repaid when the property is transferred to another owner unless the property is inherited by the leaseholder's spouse, civil partner or a person living with them as their husband or wife. The partner may succeed to the property without having to repay the Equity Loan, so long as the partner resided at the home with the leaseholder at the time of the leaseholder's death.

Succession by a partner without repayment of the Equity Loan can take place on any property located in the borough, but can only take place once. This offer will be subject to the partner being able to retain at least a 60% equity share of the property's value at that time. Surviving partners who are unable to fund a 60% share may be offered a Shared Ownership arrangement as described below.

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APPENDIX 1

POLICY STATEMENT ON THE RENTAL OFFER FOR RESIDENTIAL LEASEHOLDERS ON ESTATE RENEWAL SCHEMES

Background

The Broadwater Farm Rehousing and Payments Policy ('the policy') sets out the statutory offer to resident leaseholders whose homes in the Tangmere and Northolt blocks are being demolished, ie:

- the full market price for their property, plus
- a statutory 10% Home Loss, plus
- Disturbance Payments to cover the costs such as valuations, stamp duty, surveyor's fees as well as physical moving costs.

The policy also makes additional offers available, ie a Portable Equity Loan which can be used to help fund up to 40% of the cost of a new home in the borough.

Although the policy does not set out the options for those who cannot afford to purchase a new home using these offers, the borough-wide policy on which it is based (the Estate Renewal Rehousing and Payments Policy – the "ERRPP") offers to:

> *'sympathetically review the options available to each leaseholder … [which] may include alternative financing, smaller properties, or a rental offer on the estate renewal scheme',*

It also states that:

> *'applications will be assessed in line with the Council's Housing Allocations Policy in force at the time of the assessment' and that: 'rental offers will not normally be made outside of the renewal area unless the applicants meet the income and saving thresholds, and restrictions on home ownership'.*

The offer of a tenancy is made through an application to the Discretionary Panel which has the power to make non-standard offers to residents. In considering the most suitable offer, the panel may consider all aspects of the request including the standard offer, the finances available to the tenant, their housing needs and any specific personal circumstances that are relevant to the decision.

This policy statement sets out the type of rental offer available to the panel where the panel deems this is appropriate, and the implications this has on the value offered for the leaseholder's current home rental offer.

Scope of the policy

This policy statement only applies to resident leaseholders of Tangmere and Northolt who are required to move due to the demolition of the block.

Tenancy Offers will only be made by the Assistant Director of Housing, in exceptional circumstances, where it has been requested by the leaseholder

concerned and following a recommendation by the Broadwater Farm Discretionary Panel.

The tenancy offer

As a local authority, and in accordance with its own agreed policies, Haringey Council's offer of a tenancy in these circumstances would be a secure social tenancy at formula ('Council') rents - unless the leaseholder was willing to accept a nomination to a Housing Association property.

In comparison to the alternative options, eg a private rented tenancy, a social tenancy with the Council has significant value, offering a secure, lifetime tenancy, low rent and the possibility to exercise the Right to Buy in future years.

A Council tenancy also has significant value to the Council as it would otherwise provide secure and stable housing to households in need, many of whom are currently in expensive, subsidised and less suitable temporary accommodation.

Social housing stock is in limited supply, so the Council therefore believes that where a social tenancy is to be offered to a residential leaseholder, it is appropriate that the leaseholder receives a reduced value for their current property (as set out below), regardless of whether this tenancy is with the Council or a Housing Association.

Where this offer is refused, or where the Discretionary Panel or Assistant Director of Housing believes a private tenancy is more suitable, the leaseholder may instead receive the full market value and a private sector tenancy offer.

In either case, the leaseholder would also receive the full Home Loss payment based on the full market value of the property, because, like other leaseholders affected, he/she is losing their home. Disturbance payments will be payable in full at the point the tenant (former leaseholder) moves, as it is with all other Council tenants.

Where an offer of a social tenancy is offered by the Assistant Director of Housing and accepted by the leaseholder, the leaseholder will receive a direct offer of a tenancy. This offer will be made in line with the Broadwater Farm Rehousing & Payments Policy commitments to secure tenants and will thus include an ability of the second Band A move if they former leaseholder wishes.

The valuation methodology

Where an offer of social tenancy is made, the Council has decided to use an existing valuation method as set out in the '*Existing Use Value as Social Housing' (EUV-SH)* valuation of 25% of market value as cited in the HMT guidance '*Stock Valuation for Resource Accounting'*.

This valuation method is set out as applying to properties which are transferred from one social landlord to another with a social tenant in occupation. While this is not completely analogous, this valuation takes into account that the Council is purchasing a property (the leaseholder's home) but at the same time gaining a social tenant (the former leaseholder).

APPENDIX 1

However, in some cases, this valuation may be lower than the price the leaseholder paid for the property, which may cause difficulties for those who bought under the Right to Buy.

As a safeguard, it is therefore also proposed that for former Haringey tenants who bought under the Right to Buy, the offer will be the higher of 25% of current market price or the price the leaseholder originally paid for their property, after deducting any discount received. This will be updated to current market valuations by the highest of either the Consumer Price Index or the Nationwide London House Price index. This safeguard will also be available to partners who inherited their property from a former Haringey tenant who bought under the Right to Buy.

This safety net does not apply to leaseholders who were not former Haringey tenants who bought the home under the Right to Buy.

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BROADWATER FARM LOCAL LETTINGS PLAN

1 The need for a Local Lettings Plan

1.1 The Broadwater Farm Emergency Rehousing Policy offers two different Rights to Return to all tenants in Tangmere and Northolt who have been required to move due to emergency repairs.

a. The Right to Return to a vacant property on the estate.

Returning tenants will only have one offer of a vacant property. Returning tenants who refuse this offer will lose their Right to Return to a vacant property. Acceptance or refusal of a vacant property will not affect the tenants Right to Return to a newly built property.

b. The Right to Return to a newly built property built on the former sites.

Tenants will only have one offer of a newly built property and refusal of this will be deemed to have ended both Rights to Return.

1.2 To honour these commitments, this Local Lettings Plan sets out the priorities for vacant homes on the Broadwater Farm estate.

2 Application of this policy

2.1 This lettings plan will come into force following approval by the Cabinet and remain in place until there are no remaining tenants with either Right to Return.

2.2 This policy does not apply to lets where a property is unavailable due to successions or legal reasons.

3 Priority for vacant properties on Broadwater Farm

Each vacant property on the estate will be offered to households in the following order of priority.

1 Secure tenants who remain in Northolt or Tangmere and need to be rehoused using a Direct Let

a. Tenants from these blocks who are vulnerable
b. Tenants from these blocks with a local connection
c. All other tenants from these blocks

2 Secure tenants who left Tangmere or Northolt after 26 June 2018 and still have a Right to Return to a vacant property.

d. Tenants retaining a Right to Return to a vacant property and who have a Housing Need for this size property.

Within any grouping described above, priority will be given to those with the earliest Broadwater Farm tenancy start date.

In the event of tenants otherwise having equal priority the property will be offered to the tenant with the earliest start date to their tenancy on the estate. In the event of there being no such tenant, then:

e. Households as determined by the Housing Allocations Policy

4 Priority for newly built properties built on the site of Tangmere and/or Northolt

4.1 Lets to newly built replacement properties will be allocated on the same basis as described above.

5 Definitions

5.1 Housing Needs and suitability of properties will be determined by the Housing Allocations Policy in force at the time. Tenants will have the right to appeal if they believe that the property is not suitable.

5.2 The start date for those who succeeded to their tenancy will be the start date of the original tenancy so long as the tenancy was also in the same property.

5.3 Previous tenants will retain the Rights to Remain until one or more of the following has occurred;

<u>For the Right to Return to a vacant property</u>

- The tenant, or their successor, has received an offer of a suitable vacant property on the Broadwater Farm Estate

<u>For both Rights of Return</u>

- The tenant, or their successor, has received an offer of a suitable newly built property on the Broadwater Farm Estate

- The tenant no longer holds a social tenancy.

Any offers to return will be made on the basis of their Housing Need at the time of the offer regardless of the size of their original home on Broadwater Farm or their home at the time of the offer.

5.4 Vulnerable tenants is taken to mean tenants (or members of their household) who are vulnerable, at high risk to themselves or the property, or who have specialist needs such as mobility requirements.

5.5 Local connection is taken to mean where a tenant of member of their household is attending a local school, or have support services only available in the local area (“local” and “locally” meaning within N17/N22), or those who are working locally.

6 Discretion

6.1 This policy cannot over every eventuality and the Council reserves the right to make offers outside of this lettings plan in exceptional circumstances.

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Equality Impact Assessment (EQIA)

The Equality Impact Assessment (EQIA) form is a template for analysing a policy or proposed decision for its potential effects on residents with protected characteristics covered by the Equality Act 2010.

The council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council recognises the profound and far-reaching impacts of socioeconomic disadvantage treats socioeconomic status as a local protected characteristic.

1. Responsibility for the Equality Impact Assessment

Name of proposal:	**Stapleford North Rehousing & Demolition**
Service Area:	**Housing, Regeneration and Planning.**
Officer Completing Assessment:	**Sarah Lovell**
Equalities/HR Advisor:	**Jim Pomery / Elliot Sinnhuber**
Cabinet meeting date (if applicable):	**[ ] June 2022**
Director/Assistant Director	**Peter O'Brien**

2. Executive summary

Please complete this section *after* completing the rest of the form and summarise:

- The policy proposal, its aims and objectives, the decision in consideration. Please focus on **the change** that will result from this decision.
- Results of the analysis: positive and negative equality impacts

- Mitigations that will be taken to minimise negative equality impacts (if relevant)
- Next steps (this may be future consultation or stages of the project)

This EqIA was originally used to inform a consultation with residents and was further updated to inform a final decision recommended for Cabinet in September 2021. It has since been updated to reflect the outcome of the Broadwater Farm resident ballot and to be appended to the June 2022 Cabinet report recommending the demolition and rehousing of Stapleford North (flats 25-36, 61-72).

Background:

In 2018, the decision was taken to demolish the Tangmere and Northolt blocks on Broadwater Farm Estate in North Tottenham due to structural faults. Since then, the Council has been working in partnership with residents and wider stakeholders on designs for new homes. It has become apparent that one small block on the estate, the Stapleford North block, is likely to experience very significant levels of disruption over a prolonged period due to its location.

In July 2021, Cabinet approved a consultation with residents in the 24 1-bedroom properties in Stapleford North wing block on Broadwater Farm about the future of their block. The residents were presented with two options:

- Option 1 – Refurbishment of the block. In this option the Stapleford North block would have the strengthening and refurbishment works completed to it. The majority of the 24 residents would be able to stay in situ, however residents were informed that it is likely to be necessary to temporarily relocate some of the households on the edge of the blocks whilst this work is completed.
- Option 2 – In this option the Stapleford North block would be demolished and new homes would be built. Residents would be rehoused under the existing Broadwater Farm Rehousing and Payments Policy, which gives residents the right-to return to new homes on the estate once they have been completed.

Consultation & decision-making path:

The consultation ran from 26th July 2021 to 26th August 2021. The council put in place a series of measures to ensure that all of the affected residents were able to participate fully in the consultation. This is so that all residents, regardless of their background, first language, or individual needs, were able to understand and respond to the consultation and receive all of the information and support that they need. Measures included extensive 1-1 engagement with the residents of the affected properties. This included several attempts to knock on doors and call each resident. It also included making sure translations, accessible versions, and independent support was available.

A majority of respondents chose option 2 (13 compared to 8 for option 1). A report was considered by Cabinet on 14th September 2021 recommending for the demolition of Stapleford North to be included in the 'preferred design scenario' which residents were asked to vote on in an estate wide ballot between 11th February and 7th March 2022. The ballot finished with 85% of voters supporting the proposals, on a turnout of 55%. As Cabinet agreed to approve option 2 being included in the 'preferred design scenario' and residents have now agreed to this 'preferred design scenario' through the ballot, this updated EqIA only considers the impact of option 2 (demolition and replacement homes).

Equalities Impact and Mitigations

It was originally believed that the block contained 19 secure Council tenants, 4 leaseholders, and 1 tenant in temporary accommodation. Upon beginning the consultation, officers became aware that the block actually consisted of 17 secure tenants, 4 leaseholders, 2 unauthorised occupants, and 1 vacant property. The residents in this block are disproportionately from older age groups, BAME backgrounds, and lower socio-economic households.

Following the decision taken in September 2021 and the resident ballot, all residents in this block will face short-term disruption but will be positively impacted in the long-term as they would be living in safer properties, and secure tenants will be placed in Band A for rehousing and will also have a Right to Return to brand new council homes on the estate. Specific mitigations, such as those provided within the Broadwater Farm Rehousing and Payments Policy and as set out in this EqIA, will be put in place to mitigate the potential negative impacts on those with protected characteristics. Further to this, there will be wider benefits to the whole Broadwater Farm community – who are disproportionately (compared to borough averages) from BAME backgrounds, older sections of the population, and lower socio-economic backgrounds.

These proposals ensure that the residents of Stapleford North are given the same support that was given to residents of Tangmere and Northolt blocks, also situated on the Broadwater Farm estate. The equalities impact of the rehousing and demolition of these blocks has previously been assessed, and can be found within the background documents linked to this EQIA.

Relevant background documents:

1) **June 2018** - Approve consultation on demolition of Northolt and Tangmere: https://www.minutes.haringey.gov.uk/ieIssueDetails.aspx?IId=62998&PlanId=0&Opt=3#AI58198
2) **November 2018** - Approval of Demolition of Northolt and Tangmere: https://www.minutes.haringey.gov.uk/ieIssueDetails.aspx?IId=63663&PlanId=0&Opt=3#AI58796

3) **Oct 2020 - CPO:** https://www.minutes.haringey.gov.uk/ieIssueDetails.aspx?IId=71378&PlanId=0&Opt=3#AI65938
4) **July 2021 - Stapleford Consultation:** https://www.minutes.haringey.gov.uk/ieIssueDetails.aspx?IId=76048&PlanId=0&Opt=3#AI69147
5) **September 2021 - Stapleford Demolition:** https://www.minutes.haringey.gov.uk/ieIssueDetails.aspx?IId=76699&PlanId=0&Opt=3#AI69733

3. Consultation and engagement

3a. How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

The feedback received in the S105 consultation carried out in August 2021 was considered fully and presented back to Cabinet in September 2021 with a recommended course of action to include option 2 in the 'preferred design scenario' for Broadwater Farm. The results of the consultation informed the recommendation made to Cabinet, with the majority of respondents opting for option 2.

Following this, the demolition of Stapleford North (flats 25-36, 61-72) was included within the 'preferred design scenario' presented to residents in the Landlord Offer for the resident ballot. 1073 eligible residents received this information and 590 (55%) voted in the ballot. 85% of those who voted opted to support the proposals.

To enable all residents to participate in the S105 consultation and resident ballot, some key actions took place:

- All materials to residents contained a translation panel for residents to inform us if they need to receive this in a different language or accessible format (e.g., braille or large print). A translator was also made available upon request.
- Copies of the Landlord Offer and FAQ were translated into Turkish, Somali and Spanish for residents who were identified as needing this.
- Door-knocking took place on eighteen separate occasions to ensure all residents were aware of the information and had a chance to ask Council staff questions about the consultation and ballot.
- Follow up phone calls took place to check in on any residents that were unreachable at the door.

- Multiple options for responding to the consultation were given, including over the phone, online, attending a drop-in session, or completing and returning a consultation booklet.
- Multiple voting options were provided in the ballot, such as freepost, online and over the phone.
- Spanish, Turkish, and Somali interpreters were present at various engagement events and carried out outreach phone calls and door-knocking. Members of the team who spoke Bengali, Urdu and Portuguese were able to provide interpreting for residents who needed it.
- The information was set out on the Broadwater Farm section of the Council's website.
- A reminder leaflet was sent to all households 2 weeks before the end of the S105 consultation, reminding them of how to get involved and giving them contact details for our engagement officer and the Independent Tenant and Leaseholder Advisor.
- Several methods were used, including leaflets, texts and public events to ensure everybody had access to the information required to make an informed decision in the resident ballot.

3b. Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

The S105 consultation closed on 26th August 2021. We received 21 responses from the 24 households. Of these 21 responses, 8 chose option 1 (refurbish and retain) and 13 chose option 2 (demolish and replace). A full summary of the responses to the consultation was included as an appendix to the September 2021 Cabinet report. As a majority of responses opted for option 2, the Cabinet report recommended that this option was included in the 'preferred design scenario' to be presented to residents in the estate wide ballot.

The resident ballot closed on 7th March 2022. We received 590 votes, with 502 (85%) of these voting 'yes' for the proposals outlined within the Landlord Offer. Throughout this period, the team were able to further engage with the residents of Stapleford North and ensure that they were able to participate in the ballot.

4. Data and Impact Analysis

Please consider how the proposed change will affect people with protected characteristics.

4a. Age

Data
Borough Profile[1]

[1] Source: State of the Borough

0-17	56,718: (21%)
18-34	72,807: (27%)
35-49	68,257: (25%)
50-64	44,807: (17%)
65+	28,632: (11%)

Target Population Profile

- **There are a disproportionate number of older residents in this block, with at least 11 of the secure tenants or leaseholders in Stapleford North are aged over 60.**
- **Several tenants and leaseholders have young children living in the block.**

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

- **Section 105 consultation, informal needs assessments and 1-1 engagement.**

Detail the findings of the data.

a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
b) Might members of this group be disproportionately affected by this proposal as a result of a need related to their protected characteristic?

The age profile in the block is considerably older than the age profile across the borough. The decision to demolish and replace the block will therefore have a disproportionate impact on older residents.

Elderly residents

Where elderly or vulnerable residents are to be rehoused, the Council recognise that this may more significantly impact them due to the higher prevalence of physical disabilities and mental health difficulties amongst the older population (compared to the general population). Dedicated support would be offered to impacted residents – such as financial and one-to-one support from rehousing officers throughout the rehousing process.

The Council recognises that being rehoused could have negative impacts on those with this protected characteristic if they have support or healthcare needs in the local area. These residents would be supported to find a suitable property in the local area where possible. This would include carrying out occupational therapy assessments to determine if any specialist adaptations or equipment would be required in the new property – which the Council would pay for.

Young children

Where there are young children in this block, the Council recognises that the impact of rehousing on them could be negative. All effort would be made to work closely with residents to ensure that those with children are prioritised for moves in the local area, so that they do not need to move schools wherever possible.

Where young children are present on the site, they would be negatively impacted in the short term if it was necessary for them to move schools as a result of rehousing. Under the Broadwater Farm Rehousing and Payments Policy, those with young children will be prioritised for housing in the local area, and housing officers would work closely with these residents to help them find the most suitable housing option. This should mitigate this concern, by helping these residents remain at the same school wherever possible.

Resident leaseholders will be positively impacted with the provision for home loss payments, equity loans and the leaseholder right to return contained within this policy.

Non-resident leaseholders will be positively impacted by the provision of home loss payments and market value for their properties.

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The impact will be both positive and negative, as described above.

4b. Disability[2]

Data
Borough Profile [3]

4,500 people have a serious physical disability in Haringey.
19,500 aged 16-64 have a physical disability this equates to approximately 10% of the population aged 16-64.
1,090 people living with a learning disability in Haringey.
4,400 people have been diagnosed with severe mental illness in Haringey.

Target Population Profile

[2] In the Equality Act a disability means a physical or a mental condition which has a substantial and long-term impact on your ability to do normal day to day activities.
[3] Source: 2011 Census

- **Our needs assessments suggest that a number of residents in this block suffer from ill health or disabilities, including hearing difficulties and significant hospital treatment.**

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

- **Section 105 consultation, informal needs assessments and 1-1 engagement.**

Detail the findings of the data.

a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Some residents with disabilities may face particular challenges. The Council has identified that some residents in this block have mobility issues. Further residents have hearing difficulties and need BSL interpretation.

Any other disabilities will be identified through individual needs assessments as part of the rehousing process.

The Council recognises that being rehoused could have negative impacts on those with this protected characteristic if they have support or healthcare needs in the local area. These residents would be supported to find a suitable property in the local area where possible. This would include carrying out occupational therapy assessments to determine if any specialist adaptations or equipment would be required in the new property – which the Council would pay for.

Under the Broadwater Farm Rehousing and Payments Policy, they will be positively impacted by the two rights to return that are guaranteed within this policy. Compared to the existing Stapleford North homes, the new homes would be more accessible and be more suitable to those with disabilities, positively impacting those with this protected characteristic.

Resident leaseholders will be positively impacted with the provision for home loss payments, equity loans and the leaseholder right to return contained within this policy.

Non-resident leaseholders will be positively impacted by the provision of home loss payments and market value for their properties.

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Both negative and positive impacts, as outline above.

4c. Gender Reassignment[4]

Data

Borough Profile

There is no robust data at Borough level on our Trans population, however the central government estimates that there are approximately 200,000-500,000 Trans people in the UK. Assuming an average representation, this would mean between 800 and 2000 Haringey residents are Trans.[5]

Target Population Profile

The Council does not hold specific data on residents regarding this protected characteristic. Individual engagement throughout the consultation has not identified any of the residents in this block with this protected characteristic.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

- **Section 105 consultation, informal needs assessments and 1-1 engagement.**

Detail the findings of the data.

a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

The Council recognises that re-housing can be a challenge for someone with this protected characteristic, due to the need to access specific healthcare and support networks. The Council will continue to work with residents of this block to ensure that specific impacts

[4] Under the legal definition, a transgender person has the protected characteristic of gender reassignment if they are undergoing, have undergone, or are proposing to undergo gender reassignment. To be protected from gender reassignment discrimination, an individual does not need to have undergone any specific treatment or surgery to change from one's birth sex to ones preferred gender. This is because changing ones physiological or other gender attributes is a personal process rather than a medical one.

5 Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.

based on this protected characteristic are mitigated, in the event that this is identified at a later date.

The Council recognises that being rehoused could have negative impacts on those with this protected characteristic if they have support or healthcare needs in the local area. These residents would be supported to find a suitable property in the local area where possible.

Under the Broadwater Farm Rehousing and Payments Policy they would be positively impacted by the two rights to return that are guaranteed within this policy.

Resident leaseholders will be positively impacted with the provision for home loss payments, equity loans and the leaseholder right to return contained within this policy.

Non-resident leaseholders will be positively impacted by the provision of home loss payments and market value for their properties.

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Both negative and positive, as detailed above.

4d. Marriage and Civil Partnership

Data

Borough Profile [6]

Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (8.2%)
In a registered same-sex civil partnership: (0.6%)
Married: (33.3%)
Separated (but still legally married or still legally in a same-sex civil partnership): (4.0%)
Single (never married or never registered a same-sex civil partnership): (50.0%)
Widowed or surviving partner from a same-sex civil partnership: (3.9%)

Target Population Profile

[6] Source: 2011 Census

People who are in a civil partnership will be treated the same as people who are married in all respects.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

People who are in a civil partnership will be treated the same as people who are married in all respects.

Detail the findings of the data.

a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

People who are in a civil partnership will be treated the same as people who are married in all respects.

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

People who are in a civil partnership will be treated the same as people who are married in all respects.

4e. Pregnancy and Maternity

Data

Borough Profile [7]
Live Births in Haringey 2019: 3646

Target Population Profile

The council does not hold data on pregnancy and maternity among its tenants and leaseholders. However, through engagement with residents, it has become clear that there are residents who are currently pregnant.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

[7] Births by Borough (ONS)

- **Section 105 consultation, informal needs assessments and 1-1 engagement.**

Detail the findings of the data.

a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

The council does not hold data on pregnancy and maternity among its tenants and leaseholders. However, through engagement with residents, it has become clear that there are residents who are currently pregnant in the Stapleford North block. Mitigation to ensure these residents are not disproportionately impacted will be fully considered through the individual needs assessments that will be undertaken as part of the rehousing. It is not clear at what stage of their pregnancy that the rehousing will take place, so rehousing officers will work closely with these residents to minimise disruption to their lives. There is also a chance that other residents could become pregnant in this time. Therefore, the council will need to ensure that it considers the inequalities and discrimination experienced by those who are pregnant or who are new mothers throughout.

The disruption caused by demolition and replacement will need to be mitigated through dedicated support for any resident who presents with this protected characteristic during the rehousing process.

The Council recognises that residents with this protected characteristic will be negatively impacted in the short-term by the process of rehousing. Rehousing officers would work closely with residents in this case to ensure that they were supported to find suitable properties, such as in the local area to continue accessing healthcare and support networks. These residents would be positively impacted by the rehousing policy as this would allow them to be place on Band A on the Housing Register and to move to a more suitable sized property for their newly expanded household (the Stapleford North properties are all 1-bedroom). The council have already identified several residents who would benefit as a result of this.

Resident leaseholders will be positively impacted with the provision for home loss payments, equity loans and the leaseholder right to return contained within this policy.

Non-resident leaseholders will be positively impacted by the provision of home loss payments and market value for their properties.

Secure tenants will be positively impacted by the two Rights to Return guaranteed by the Broadwater Farm Rehousing and Payments Policy and by the improved safety and quality of their new homes.

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Both negative and positive, as detailed above.

4f. Race

Data

Borough Profile [8]

Arab:	**0.9%**	**in total**
Any other ethnic group:	3.9%	
Asian:	**9.5%**	**in total**
Bangladeshi:	1.7%	
Chinese:	1.5%	
Indian:	2.3%	
Pakistani:	0.8%	
Other Asian:	3.2%	
Black:	**18.7%**	**in total**
African:	9.0%	
Caribbean:	7.1%	
Other Black:	2.6%	
Mixed:	**6.5%**	**in total**
White and Asian:	1.5%	
White and Black African:	1.0%	
White and Black Caribbean:	1.9%	
Other Mixed:	2.1%	
White:	**60.5%**	**in total**
English/Welsh/Scottish/Norther Irish/British:	34.7%	
Irish:	2.7%	
Gypsy or Irish Traveller:	0.1%	
Other White:	23%	

Target Population Profile

[8] Source: 2011 Census

The Council is aware that those living in this block are disproportionately from BAME backgrounds compared to the general or borough populations.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

- **Section 105 consultation, informal needs assessments and 1-1 engagement.**

Detail the findings of the data.

a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

The Council is aware that those living in this block are disproportionately from BAME backgrounds compared to the general or borough populations. Therefore, there will be a disproportionate impact on those with this protected characteristic. The Council recognises that for BAME people there may be specific cultural ties, such as businesses locally that cater specific cultural needs of residents of a particular race or ethnicity.

As a result of their over-representation in the impacted group, residents from a BAME background will be disproportionately impacted by the disruption caused from needing to be rehoused. The residents would receive dedicated support to ensure that they were able to prepare for and be supported through these moves.

The Council recognises that being rehoused could have negative impacts on those with this protected characteristic if they have support or cultural ties in the local area. These residents will be supported to find a suitable property in the local area where possible under the Broadwater Farm Rehousing and Payments Policy.

Under the Broadwater Farm Rehousing and Payments Policy they will be positively impacted by the two rights to return that are guaranteed within this policy. They will also be positively impacted by the financial and one-to-one support from rehousing officers they will receive under the rehousing policy, which aims to make sure no resident is financially worse off as a result of rehousing.

Resident leaseholders will be positively impacted with the provision for home loss payments, equity loans and the leaseholder right to return contained within this policy.

Non-resident leaseholders will be positively impacted by the provision of home loss payments and market value for their properties.

All residents would be positively impacted by the higher quality of the new homes and the fact that they would no longer be living in structurally unsound blocks.

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Both negative and positive, as detailed above.

4g. Religion or belief

Data

Borough Profile [9]

Christian:	45%
Buddhist:	1.1%
Hindu:	1.9%
Jewish:	3%
Muslim:	14.2%
No religion:	25.2%
Other religion:	0.5%
Religion not stated:	8.9%
Sikh:	0.3%

Target Population Profile

The Council and Homes for Haringey do not collect this data on residents and where the data is collected, it is frequently under-reported. Data from the consultation suggests that residents in this block are more likely to be religious than the borough average.

What data will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

- **Section 105 consultation, informal needs assessments and 1-1 engagement.**

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

There may be a greater impact on those who go to a specific place of worship or are part of a religious community. Where possible, the Broadwater Farm Rehousing and Payments Policy aims to give residents choice about their move to a new home and therefore should

[9] Source: 2011 Census

help these residents ensure they have access to places of worship or their religious community.

Secure tenants and resident leaseholders would be positively impacted by the disturbance and home loss payments and the two Rights to Return guaranteed by the Broadwater Farm Rehousing and Payments Policy. They will also benefit from the improved safety and quality of their new homes. The Rights to Return will ensure that, should residents wish, they can return to the estate and therefore be close to the religious institutions or communities that they currently belong to.

The effects of being required to move will, in part, be offset by support being given to each household, including financial help with the costs of moving. They would also receive one-to-one support from rehousing officers to find suitable properties in the local area where possible.

Resident leaseholders will be positively impacted with the provision for home loss payments, equity loans and the leaseholder right to return contained within this policy.

Non-resident leaseholders will be positively impacted by the provision of home loss payments and market value for their properties.

4h. Sex

Data
Borough profile [10]
Females: 50.5%
Males: 49.5%

Target Population Profile

The data suggests that there is a fairly even split of males and females in the affected block – in line with the borough population.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

- **Section 105 consultation, informal needs assessments and 1-1 engagement.**

Detail the findings of the data.

[10] Source: 2011 Census

a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

There is no reason to believe that there would be specific negative impact on anyone due to this protected characteristic as a result of the preferred option.

However, it is noted that residents with children and lone parents (who are disproportionately women) may face particular disruption. The Council recognises that moving home will be more disruptive to households with children, who may have to make alternative arrangements for schooling. These changes are more likely to affect single mothers who may have support networks in place in the local area, benefit from local facilities aimed at single parent households, and benefit from proximity to work arrangements.

Under the Broadwater Farm Rehousing and Payments Policy, those with children in a local school will be given priority to remain in the local area should they wish to do so. Further to this, they would be positively impacted by the two rights to return that are guaranteed within this policy. In addition, the policy makes provisions for disturbance payments to cover all of the reasonable costs of moving, which could include new school uniforms if a child or children were to move schools as a result of moving.

It is also noted that, where identified, those with children currently living in Stapleford North (all of which are 1-bedroom properties) will be able to move to more suitable properties with enough bedrooms for their families. Therefore, they will be positively impacted by being on Band A for rehousing.

Resident leaseholders will be positively impacted with the provision for home loss payments, equity loans and the leaseholder right to return contained within this policy.

Non-resident leaseholders will be positively impacted by the provision of home loss payments and market value for their properties.

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Both negative and positive, as detailed above.

4i. Sexual Orientation

Data

Borough profile [11]

3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013. In Haringey this equates to 6,491 residents.

Target Population Profile

The Council and Homes for Haringey do not collect this data on residents and where the data is collected, it is frequently under-reported. There is no reason to believe that the residents in this block are disproportionately represented with this protected characteristic. Therefore, it is not believed that individuals with this protected characteristic would be disproportionately affected by the decision to demolish and replace Stapleford North.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

- **Section 105 consultation, informal needs assessments and 1-1 engagement.**

Detail the findings of the data.

a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

It is not believed that the disruption caused by rehousing would disproportionately impact affected residents based on this protected characteristic. Secure tenants and resident leaseholders would be positively impacted by the home loss and disturbance payments and the two Rights to Return guaranteed by the Broadwater Farm Rehousing and Payments Policy. They will also be positively impacted by the improved safety and quality of their new homes.

Resident leaseholders will be positively impacted with the provision for home loss payments, equity loans and the leaseholder right to return contained within this policy.

Non-resident leaseholders will be positively impacted by the provision of home loss payments and market value for their properties.

[11] Source: ONS Integrated Household Survey

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Neutral to positive impact overall.

4j. **Socioeconomic Status (local)**

Data

Borough profile

Income[12]

Haringey is the 4th most deprived borough in London as measured by the IMD score in 2019. The most deprived LSOAs (Lower Super Output Areas or small neighbourhood areas) are more heavily concentrated in the east of the borough.
22.4% of the population in Haringey aged 16-65 receive Universal Credit as of March 2021.
29% of employee jobs in the borough are paid less than the London Living Wage.
The average wage of someone working in Haringey is £30,452 per year and the average resident wage (including people who travel out of the borough for work) is £35,769 per year.

Educational Attainment[13]

While Haringey's proportion of students attaining grade 5 or above in English and Mathematics GCSEs is higher than the national average, it performs worse than London.
5.5% of Haringey residents have no qualifications.

Target Population Profile

The Council recognises that social tenants, temporary accommodation residents and leaseholders in this block are disproportionately likely to be from low-income households. Therefore, those from low-income backgrounds will disproportionately be impacted by the decision to demolish and replace Stapleford North.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

- **Section 105 consultation, informal needs assessments and 1-1 engagement.**

Detail the findings of the data.

[12] Source: Annual Survey of Hours and Earnings, ONS, 2019
[13] Source: Annual Population Survey 2019 (via nomis)

a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

These residents will face some level of disruption due to the need to be rehoused. The provisions set out under the Broadwater Farm Rehousing and Payments Policy – such as home loss and disturbance payments, and the Right to Return – will help to offset these negative impacts.

The Council recognises that residents with this protected characteristic will be negatively impacted in the short-term by the process of rehousing. Rehousing officers will work closely with residents in this case to ensure that they were supported to find suitable properties, including through the financial provisions set out in the Broadwater Farm Rehousing and Payments Policy. This policy was developed in adherence to the Estate Renewal Rehousing and Payments Policy (ERRPP) which aims to ensure that residents are not financially worse off as a result of rehousing. This includes by providing a £7,100 Home Loss payment for secure tenants and disturbance payments to cover the reasonable costs of moving home (such as new school uniforms for a change of schools). Resident leaseholders will benefit from a home loss payment worth 10% of the market value of their property and equity loans to enable them to move to new properties either locally or further afield (should this be approved by the discretion panel). Non-resident leaseholders are entitled to a home loss payment worth 7.5% of the market value of their property.

Resident leaseholders will also have the option to return to a council tenancy if they are unable to access any other housing option and receive a lump sum payment worth 25% of the value of their property or, if higher, the amount they paid for their home updated by house price index. This gives vulnerable leaseholders alternative options and will have a positive impact to minimise disruption caused by rehousing.

In addition, at Cabinet in December 2021, it was agreed that rent for secure tenants returning to Broadwater Farm (e.g., once the new homes are built) is to be capped at no more than 10% above the average rent for equivalent size properties on the estate. This will allow these residents to return on similar terms to their previous tenancy. This will have a positive impact on these residents, ensuring that they can afford to return to the estate should they wish (and benefit from brand new homes).

All residents to be rehoused due to this decision will benefit from the improved safety and quality of their new homes.

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Both negative (short-term) and positive (medium to long-term), as detailed above.

5. Key Impacts Summary

5a. Outline the key findings of your data analysis.

Overall, this decision will have a positive impact on all residents. Firstly, those that are rehoused will benefit from better quality, more suitable homes; the provisions set out in the BWFRPP; and the improved quality of their homes and the estate should they opt to return. The wider benefits to the community are also clear, with more family homes to be delivered and better place-making – with improvements to green and open spaces and accessibility on Willan Road as a result of the demolition and reprovision of Stapleford North.

The Neighbourhood Move Scheme also ensures that it is the local community (i.e., those on the Broadwater Farm estate) who will benefit most from these proposals – giving priority to these residents for the new homes.

It is not believed that this proposal would result in any direct or indirect discrimination for any group that shares a protected characteristic.

5b. Intersectionality

- Many proposals will predominantly impact individuals who have more than one protected characteristic, thereby transforming the impact of the decision.
- This section is about applying a systemic analysis to the impact of the decision and ensuring protected characteristics are not considered in isolation from the individuals who embody them.
  Please consider if there is an impact on one or more of the protected groups? Who are the groups and what is the impact?

Many of the residents in this block will have protected characteristics in two or more equalities strands, such as elderly BAME residents or women with mobility issues**.** The Council recognises that inter-connected protected characteristics require a tailored approach that recognises the specific needs of individuals and households. This is why all effort will be made to ensure that every resident has all of the information and support necessary throughout the rehousing process, such as by undertaking individual needs assessments and providing financial support under the Broadwater Farm Rehousing and Payments Policy.

5c. Data Gaps

Based on your data are there any relevant groups who have not yet been consulted or engaged? Please explain how you will address this

None applicable.

6. Overall impact of the policy for the Public Sector Equality Duty

Summarise the key implications of the decision for people with protected characteristics.

In your answer, please consider the following three questions:

- Could the proposal result in any direct/indirect discrimination for any group that shares the relevant protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not?
- Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

It is not believed that this proposal would result in any direct or indirect discrimination for any group that shares a protected characteristic.

7. Amendments and mitigations

7a. What changes, if any, do you plan to make to your proposal because of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EQIA guidance

Please delete Y/N as applicable

No major change to the proposal: the EQIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them **Y**

No major change to the proposal, all negative impacts are mitigated.

Adjust the proposal: the EQIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly set out

below the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below **N**

N/A

Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision. **N**

N/A

7b. What specific actions do you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty?

Action:

Socio-economic – most residents will be from lower-income backgrounds and hence impacted by the need to be rehoused.

Action: provisions for financial support, set out in the BWFRPP and detailed in this EQIA, will mitigate the costs of moving home and ensure all reasonable costs are covered for residents. The provision of equity loans for resident leaseholders and the Right to Return for resident leaseholders and secure tenants, ensures these residents can afford to return to the estate. The 10% rent cap (above the average for an equivalent property on the estate) for returning secure tenants will mitigate the impact of newer council homes having higher council rents (due to the rent formula) and ensure that these residents can afford to return to the estate should they wish to do so.

Lead officer: **Sarah Lovell**

Timescale: **24-months**

Please outline any areas you have identified where negative impacts will happen because of the proposal, but it is not possible to mitigate them.

Please provide a complete and honest justification on why it is not possible to mitigate the:

N/A

7. Ongoing monitoring

Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented.

- Who will be responsible for the monitoring?
- What the type of data needed is and how often it will be analysed.
- When the policy will be reviewed and what evidence could trigger an early revision
- How to continue to involve relevant groups and communities in the implementation and monitoring of the policy?

Equalities duties will be taken into account throughout every stage of the rehousing and demolition process and on a case-by-case basis.

Date of EQIA monitoring review:

N/A

8. Authorisation

EQIA approved by (Assistant Director/ Director) **Peter O'Brien**

Date 19.05.2022

9. Publication

Please ensure the completed EQIA is published in accordance with the Council's policy**.**

Please contact the Policy & Strategy Team for any feedback on the EQIA process.

Report for: Cabinet – 21 June 2022

Title: Establishment of the Corporate Parenting Committee and Appointment of Cabinet Members to Committees and Partnerships 2022/23 & Confirmation of their Terms of Reference**.**

Report authorised by: Fiona Alderman, Head of Legal & Governance (Monitoring Officer)

Lead Officer: Ayshe Simsek, Democratic Services and Scrutiny Manager

Ward(s) affected: N/A

Report for Key/ Non-Key Decision: Non-Key

1. Describe the issue under consideration

1.1 To re-establish the Corporate Parenting Advisory Committee, confirm its terms of reference, and appoint Members to serve on this advisory Cabinet sub-Committee.

1.2 To update the membership of the LHC which is a joint executive committee which will only be continuing until March 2023, following agreement by constituent boroughs in Feb 2022 to disband.

1.3 To confirm the appointment of Cllr Bevan to the LHC board as he was nominated to sit on the Holding Board on 25th March as the delegated representative from the Joint Committee. This holding board will be exploring options for the new proposed corporate entity to take forward work of the LHC.

1.3 To confirm the terms of reference of the Community Safety Partnership and appoint members to this statutory partnership body.

2. Cabinet Member Introduction

2.1 The Corporate Parenting Advisory Committee is responsible for the Council's role as corporate parent for children and young people in care. Its purpose is to ensure that the health, education and access to employment of children in care is maximised, to monitor the quality of care provided, and also to ensure that children leaving care have sustainable arrangements for their future**.** It is proposed to continue with the current arrangement for the Corporate Parenting Advisory Committee.

2.2 The Council, as a constituent member borough of the LHC Joint Committee and need to appoint 2 members to this executive related body until March 2023 when the Joint Committee will cease following agreement to disband in

February 2022. The Cabinet Member responsible for Procurement and a deputy are proposed to these positions.

2.3 It is important for the Council to maintain links with the LHC Board as a previous constituent Council member and to consider plans for the new corporate entity when finalised.

2.4 The Community Safety Partnership plays an important role in ensuring that key local agencies are brought together to improve outcomes for our residents across different service areas.

3. Recommendations

It is recommended that the Cabinet:

3.1.1 To re-establish the Corporate Parenting Advisory Committee, and that the terms of reference for this advisory Sub Committee, attached at Appendix A be noted.

3.1.2 To note the Community Safety Partnership membership and terms of reference attached at Appendix B;

3.1.3 To agree appointments to the LHC Joint Committee (1 Cabinet Member – Cllr Williams and 1 non-exec – Cllr Bevan). These appointments shall be until March 2023.

3.1.4 To confirm the appointment of Cllr Bevan to the LHC Holding Board following nomination by the Joint Committee on the 25th of March 2022 as the delegated representative from the Joint Committee.

3.1.5 To appoint the following Members to serve on the Corporate Parenting Advisory Committee and Community Safety Partnership:

<u>Corporate Parenting Advisory Committee</u>
Chair – Cllr Brabazon Cabinet Member for Children, Schools, and Families
Cllr Johnson
Cllr Opoku
Cllr Mahbub
Cllr Weston
Cllr Collett
Cllr Isilar-Gosling

<u>Community Safety Partnership</u>
Cabinet Member for Economic Development, Jobs, and Community Cohesion (as Co-Chair)
Cabinet Member for Children, Schools, and Families
Cllr da Costa

4. Reasons for decision

4.1.1 Establishing a Corporate Parenting Advisory Committee ensures that there is an overview of the Councillors statutory role as a corporate parent, assisting the Council to deliver its duties to children in care and young people leaving care.

4.1.2 These appointments allow the constituent Authorities to consider participation in the new corporate entity which will help maintain the principle of collaborative working which was a core objective of the LHC when a joint Committee. Also Cllr Bevan has been a member and chair of the LHC Joint Committee for many years and will be able to continue to provide the oversight and challenge, as a Board member, to the developing plans for the new corporate entity.

4.1.3 Appointments from Cabinet are required to the Community Safety Partnership to reflect statutory duties and enable high level, accountable, strategic, oversight of issues relating community safety.

5. Alternative options considered

5.1.1 The alternative option would be for the Corporate Parenting Advisory Committee to cease and this would mean that there is not a scheduled opportunity for members and officers to meet and discuss the wellbeing of children in care and to ensure that the Council is meeting its corporate parenting obligations. This Committee is different to the Children and Young People's Scrutiny Panel as it concentrates on Looked After Children and care leavers and reports directly to the Cabinet.

5.1.2 To not appoint to the LHC Joint Committee and board would mean that the borough is not included in developing governance plans for the new corporate entity. The Council would not be able to advocate continued partnership working and maintain the principle of collaborative working which were the driving principles of the LHC.

5.1.3 The Community Safety Partnership is a statutory partnership body and therefore not appointing Cabinet Members to this body is not an option.

6. Background information

6.1.1 All Councillors, when they are elected, take on the responsibility of corporate parents to children that are looked after by their local authority. This means that they have a duty to take an interest in the well being and development of these children who are one of the most vulnerable groups in society.

6.1.2 The Corporate Parenting Committee has an overview of the Council's role as Corporate Parent for children and young people who are in care. It is responsible for ensuring that the life chances of children in care are maximised in terms of health, educational attainment and access to training and employment, in order to aid the transition to a secure and fulfilling adulthood. The

6.1.3 The LHC was a not-for-profit body set up to provide effective procurement solutions for public sector bodies, to include local authorities. This was previously established as a Joint Executive Committee in 2012. This was

agreed to be disbanded in February 2022, by constituent boroughs including Haringey, following the outcome of a governance review. The Joint committee is continuing until March 2023 to allow plans to be developed for a new corporate entity which will be put forward to constituent boroughs for consideration in due course. In the meantime, the LHC Joint Committee agreed to establish a new LHC Board of Directors. This board was given delegated authority from the Joint Committee to oversee the work of the LHC Management Team who are compiling the proposals on the new entity. There is a need to appoint 2 Members to the Joint Committee until March 2023 and also confirm the appointment of Cllr Bevan to the LHC board.

6.1.4 The Community Safety Partnership (CSP) is a statutory body established pursuant to sections 5-7 of the Crime and Disorder Act 1998. The CSP fulfils the duty placed on local authorities to address community safety in partnership with the Police and other partners.

7. Contribution to strategic outcomes

7.1 Borough Plan Objective - Reducing Inequality and making Haringey a fairer place. The Virtual School Team was established in 2009 and is a small multi-disciplinary team based in the Council and working to raise the educational attainment and attendance of children and young people. It works in close collaboration with colleagues across the authority, but also in partnership with the third sector (voluntary / community). It tracks educational progress, and monitors work with children and young people in care to help them achieve their full potential and supports and advises those who care and work with them. The Head of the Virtual School is a regular attendee of the Corporate Parenting Advisory Committee and reports to this Committee.

7.2 Borough Plan Objective – Housing Haringey's People. Having access to expert support in building procurement will assist with the Council's home building projects.

7.3 The Community Safety Partnership supports meeting the requirements of the Borough Plan objective of tackling serious violent crime.

8. Statutory Officers comments

8.1 Finance

8.1.1 These Committees can be serviced from within existing business unit resources. Members should note that these Committees do not have the authority to incur expenditure or make budgetary decisions.

8.1.2 The financial implications of joining a new LHC corporate identity will be dealt with in the relevant Cabinet report at that time.

8.2 Procurement

8.2.1 The Council can continue to access LHC frameworks whilst any corporate restructure is being put in place. Expenditure through the LHC frameworks in 2019/20 was £123k and £125k in 2020/21.

8.5 Strategic Procurement supports monitoring the proposals put forward for the new entity and considering the opportunities provided by proposed new arrangement.

8.3 Legal

8.3.1 The Head of Legal and Governance (Monitoring Officer) has been consulted on the contents of this report.

8.3.2 The Council's Constitution sets out the relevant Cabinet arrangements at Part Three, Section C and confirms that the Cabinet may establish advisory Committees the membership of which does not have to be limited to Cabinet Members. The Cabinet may change them, abolish them, or create further ones, at its own discretion. These powers must be exercised with the agreement of the Leader and may be exercised by the Leader personally.

8.3.3 In agreeing the disbandment of the Joint Committee in February 2022, the Cabinet noted that the LHC Joint Committee had agreed to establish a new LHC Board of Directors. This was given delegated authority from the Joint Committee to oversee the work of the LHC Management Team. This is a holding board and the LHC advise that there are no legal implications for members being appointed to this holding board.

8.3.5 The Community Safety Partnership (CSP) is a statutory body established pursuant to sections 5 -7 of the Crime and Disorder Act 1998. The CSP fulfils the duty placed on local authorities to address community safety in partnership with the Police and other partners.

8.4 Equality

8.4.1 There are no specific equalities and cohesion implications to the proposals made in this report.

9. Use of Appendices

Appendix A - Corporate Parenting Advisory Committee Terms of Reference
Appendix B - Community Safety Partnership Terms of Reference
Appendix C - LHC Joint Committee Terms of Reference

10. Local Government (Access to Information) Act 1985

London Housing Consortium - Cabinet Report – 9 February 2022
Appointment of Cabinet Committees 2021/22 – 15 June 2021

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Appendix A

Corporate Parenting Advisory Committee

Terms of Reference

1. To be responsible for the Council's role as Corporate parent for those children and young people who are in care;
2. To ensure the voice and views of children in care are heard;
3. To seek to ensure that the life chances of children in care are maximized in terms of their safety, health and well-being, housing, educational attainment and access to training and employment to aid the transition to a secure and fulfilling adulthood;
4. To ensure that the voice and needs of disabled children in care are identified and provided for;
5. To monitor the quality of care provided by the Council to Children in Care;
6. To ensure that young people leaving care have sustainable arrangements for their future wellbeing; and

To make recommendations on these matters to the Cabinet or Cabinet Member for Children, Schools and Families and Director for Children's Services.

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The Community Safety Partnership (CSP) –

1. Purpose

The CSP is a statutory partnership which is responsible for delivering the outcomes in the Community Safety Strategy 2019 – 22/23 that relate to the prevention and reduction of crime, fear of crime, anti-social behaviour, harm caused by drug and alcohol misuse and re-offending. The prevention of violent extremism became a further statutory duty from 1st July 2015. The CSP has strong links to the work of the Early Help Partnership and the Health & Wellbeing Board especially in respect of mental disorder and violence prevention.

The Partnership will work towards its vision by:

- Having strategic oversight of issues relating to all aspects of community safety
- Overseeing production of rolling crime/needs assessments
- Using evidence from crime audits, needs assessment and other data sources to plan value for money services and interventions
- Closely monitoring changes and trends in performance
- Making decisions in an inclusive and transparent way

2. Principles

The following principles will guide the CSP's work. It will seek to:

- Solve problems with long-term positive outcomes
- Balance risk and harm
- Seek long-term solutions to areas of multiple deprivation
- Maximise resources (co-locating, reducing duplication and pooling budgets where
- possible)
- Share information effectively as a default principle
- Build on proven interventions
- Facilitate effective community input and capacity
- Integrate approaches to enforcement/front-line services
- Monitor robustly, evaluating progress and applying good practice

3. Responsibilities and core business of the CSP

3.1 Strategic planning:

- To oversee the delivery of the strategic priorities for community safety, holding those responsible to account.
- To integrate, wherever appropriate, the plans and services of partner organisations.
- To ensure that the partnership is kept up to date so that it is able to respond effectively to changes in legislation, information and developments in relation to community safety.
- To identify, gain and manage funding as required to implement the Community Safety Strategy

- To review and update relevant information sharing protocols.

3.2 Monitoring outcomes:

- To agree a performance framework with regular monitoring and evaluation of outcomes against agreed milestones and targets.
- To monitor and review key performance indicators.
- To ensure equalities underpins the work of the partnership and all improvements deliver equality of access, outcome, participation and service experience.

3.3 Community engagement:

- To ensure the views of service users and residents are taken into consideration in planning and prioritising objectives.
- To remain flexible in order to respond to and help support individuals and communities that are affected by crime.

4. Priorities and Outcomes

4.1 The CSP is currently working on the following strategic outcomes in partnership with the Mayor's Office for Policing and Crime and the Home Office:

Outcome One	Rebuild and improve public confidence in policing and maintaining community safety
Outcome Two	Prevent and minimise gang-related activity and victimisation
Outcome Three	Respond to Violence against Women and Girls*
Outcome Four	Reduce re-offending (through an integrated multi-agency model)
Outcome Five	Prevent and reduce acquisitive crime and anti-social behaviour (to include residential burglary, personal robbery, vehicle crime, fraud and theft)
Outcome Six	Prevent violent extremism, delivering the national PREVENT strategy in Haringey

*This has been renamed from the original 'Domestic and Gender-based violence'

5. Operational protocols

5.1 Membership

The membership of the CSP will:

- reflect statutory duties
- be related to the agreed purpose of the partnership
- be responsible for disseminating decisions and actions back to their own organisations and ensuring compliance
- be reviewed annually

The list of current members and advisors is attached on page 5

5.2 Chairing arrangements

The CSP is currently being co-Chaired by the Cabinet Member responsible for Community safety and the Police Borough Commander.

5.3 Deputies and representation

Partner bodies are responsible for ensuring that they are represented at an appropriate level. It is not desirable to delegate attendance unless this is absolutely necessary. Where the nominated representative is hampered from attending, a deputy may attend in their place.

5.4 Co-opting

The Board may co-opt additional members by agreement who will be full voting members of the Board.

5.5 Ex-officio

The partnership may invite additional officers and other stakeholders to attend on an ex-officio basis, who will not be voting members of the CSPB, to advise and guide on specific issues.

5.6 Confidentiality

The CSP has a strategic remit and will not therefore discuss individual cases. However, the disclosure of information outside the meeting, beyond that agreed, will be considered as a breach of confidentiality.

5.7 Meetings

- Quarterly meetings will be held
- A meeting of the CSP will be considered quorate when at least one Chair and a representative of each of the local authority, health and police are in attendance.
- Attendance by non-members is at the invitation of the Chairs.
- The agendas, papers and notes will be made available to members of the public when requested, but meetings will not be considered as public meetings.

5.8 Agendas

Agendas and reports will be circulated at least five working days before the meeting, after the agenda has been agreed by the Chairs. Additional late items will be at the discretion of the Chairs.

5.9 Partner action

Representatives will be responsible for ensuring that all key issues are disseminated back to their organisations, ensuring compliance with any actions required and reporting back progress to the CSP.

5.10 Interest

Members must declare any personal and/or pecuniary interests with respect to agenda items and must not take part in any decision required with respect to these items.

5.11 Absence

If a representative of a statutory agency is unable to attend, a substitute must be sent to the meeting. If there is no representation for three meetings the organisation/sector will be asked to re-appoint/confirm its commitment to the partnership.

Appendix B
Community Safety Partnership - Membership List

	NAME OF REPRESENTATIVE
Statutory partners/CSP members	**Cllr Adam Jogee,** (Co-chair) -Cabinet Member Economic Development, Jobs, and Community Cohesion Caroline Haines Borough Commander (Co-chair), Haringey Metropolitan Police **Cllr Brabazon,** Cabinet Member for Schools and Families **Cllr L/D tbc** **Keith Wilson,** Borough Fire Commander, Haringey Fire Service **Rachel Lissauer,** Director of Commissioning, Haringey Clinical Commissioning Group **Mark Landy,** Community Forensic Services Manager, BEH Mental Health Trust **Geoffrey Ocen,** Chief Executive, Bridge Renewal Trust **Joanne McCartney,** MPA, London Assembly **Eubert Malcolm,** Interim Director for Environment and Neighbourhoods **Dr. Will Maimaris**, Director Public Health, Haringey Council **Ann Graham**, Director of Children Services, Haringey Council **Beverley Tarka,** Director Adult &Health, Haringey Council **Jessica Ralph,** Victim Support **Tony Hartney,** Safer Neighbourhood Board Chair
Supporting advisors	**Jo Benmore** **Sarah Hart,** Commissioning Manager, Public Health Committee Secretariat

The Community Safety Partnership (CSP) –
Previously amended Terms of Reference
July 2015

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5.17 Meetings

- Quarterly meetings will be held
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5.19 Partner action

Representatives will be responsible for ensuring that all key issues are disseminated back to their organisations, ensuring compliance with any actions required and reporting back progress to the CSP.

5.20 Interest

Members must declare any personal and/or pecuniary interests with respect to agenda items and must not take part in any decision required with respect to these items.

5.21 Absence

If a representative of a statutory agency is unable to attend, a substitute must be sent to the meeting. If there is no representation for three meetings the organisation/sector will be asked to re-appoint/confirm its commitment to the partnership.

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This Constitution had been approved by each of the Authorities as the Constitution of the LHC Joint Committee.

1. Establishment of the Joint Committee

1.1 The Joint Committee shall be the “LHC Joint Committee”

1.2 The Joint Committee is established under Section 101(5) of the Local Government Act 1972, as applied by Section 9EB of the Local Government Act 2000 and Part 4 of the Local Authorities (Arrangements for the Discharge of Functions) (England) Regulations 2012 by the Executives of each of the Councils.

1.3 The Joint Committee shall comprise two members from each of the Authorities. Each Authority’s representatives on the Joint Committee shall be appointed by the Authority’s executive, a member of the executive or a committee of the executive, as appropriate. One member shall be an executive member and one a non-executive member.

1.4 A member of the Joint Committee shall cease to be a member of the Joint Committee, and a vacancy shall automatically arise, where the member ceases to be a member of the Executive of the Appointing Authority or a

member of the Appointing Authority.

1.5 Upon being made aware of any member ceasing to be a member of the Joint Committee, the Secretary to the Joint Committee shall write to that member confirming that he/she has ceased to be a member of the Joint Committee, and notify the Appointing Authority and the other members of the Joint Committee accordingly. The relevant Appointing Authority shall appoint another qualifying member to the Joint Committee for the duration of the term of office of the original member.

1.6 When sitting on the Joint Committee members are bound by the provisions of the Members’ Code of Conduct for their authority.

2. Chairperson and Vice-Chairperson of the Joint Committee

2.1 At the first meeting of the Joint Committee and thereafter at the first meeting of the Joint Committee after 1 May in any year, the Joint Committee shall elect a Chairperson of the Joint Committee and a Vice Chairperson of the Joint Committee for the following year from among the members of the Joint Committee.

2.2 Where a member of one Authority is elected as the Chairperson of the Joint Committee, the Vice Chairperson of the Joint Committee shall be elected from among the members of the Joint Committee who are members of the other Authorities.

2.3 The Chairperson and Vice Chairperson of the Joint Committee shall each hold office until:

(i) A new Chairperson or Vice Chairperson of the Joint Committee is elected in accordance with Paragraph 2.1 above;

(ii) He/she ceases to be a member of the Joint Committee; or

(iii) He/she resigns from the office of Chairperson or Vice Chairperson by notification in writing to the Secretary to the Joint Committee.

2.4 Where a casual vacancy arises in the office of Chairperson or Vice Chairperson of the Joint Committee, the Joint Committee shall at its next meeting elect a Chairperson or Vice Chairperson, as the case may be, for the balance of the term of office of the previous Chairperson or Vice Chairperson.

2.5 Where, at any meeting or part of a meeting of the Joint Committee, both the Chairperson and Vice Chairperson of the Joint Committee are either absent or unable to act as Chairperson or Vice Chairperson, the Joint Committee shall elect one of the members of the Joint Committee present at the meeting to preside for the balance of that meeting or part of the meeting, as appropriate.

3. Secretary to the Joint Committee

3.1 The Joint Committee shall be supported by the Secretary to the Joint Committee.

3.1 The Secretary to the Joint Committee shall be an officer of one of the Authorities, appointed by the Joint Committee for this purpose. 3.2 The functions of the Secretary to the Joint Committee shall be:

(i) To maintain a record of membership of the Joint Committee;

(ii) To summon meetings of the Joint Committee in accordance with Paragraph 4 below;

(iii) To prepare and send out the agenda for meetings of the Joint Committee after consultation with the Chairperson and the Vice Chairperson of the Committee and the Project Director;

(iv) To keep a record of the proceedings of the Joint Committee and to publicise such record as is required by law;

(v) To take such administrative action as may be necessary to give effect to decisions of the Joint Committee;

(vi) Such other functions as may be determined by the Joint Committee.

4. Convening of Meetings of the Joint Committee

4.1 The Joint Committee shall meet at least twice in the course of each financial year.

4.2 Meetings of the Joint Committee shall be held at such times, dates and places as may be notified to the members of the Joint Committee by the Secretary to the Joint Committee, being such time, place and location as:

(i) the Joint Committee shall from time to time resolve;

(ii) the Chairperson of the Joint Committee, or if he/she is unable to act, the Vice Chairperson of the Joint Committee, shall notify to the Secretary to the Joint Committee; or

(iii) The Secretary to the Joint Committee, after consultation where practicable with the Chairperson and Vice Chairperson of the Joint Committee, shall determine in response to receipt of a request in writing addressed to the Secretary to the Joint Committee:

(a) from and signed by two members of the Joint Committee, or

(b) from the Chief Executive of any of the Authorities,

which request sets out an urgent item of business within the functions of the Joint Committee.

4.3 The Secretary to the Joint Committee shall settle the agenda for any meeting of the Joint Committee after consulting, where practicable:

(i) The Chairperson of the Joint Committee;

(ii) The Vice Chairperson of the Joint Committee;

and shall incorporate in the agenda any items of business and any reports submitted by:

(a) the Chief Executive of any of the Authorities;

(b) the Chief Finance Officer to any of the Authorities;

(c) the Monitoring Officer to any of the Authorities;

(d) the Legal Adviser to the Joint Committee;

(e) the Director of the LHC Operations Group;

(f) any two members of the Joint Committee in accordance with Paragraph 8.1(iii) below.

5. Procedure at Meetings of the Joint Committee

5.1 The Joint Committee shall, unless the member of the Joint Committee presiding at a meeting or the Joint Committee determines otherwise, conduct its business in accordance with the Joint Committee Procedure Rules set out in Appendix One to this Constitution

5.2 The Chairperson of the Joint Committee, or in his/her absence the Vice Chairperson of the Joint Committee, or in his/her absence the member of the Joint Committee elected for this purpose, shall preside at any meeting of the Joint Committee.

6. Powers Delegated to the Joint Committee

6.1 The Joint Committee shall act as a strategic forum for LHC, providing direction to the Operations Group. Its executive decision-making powers shall include the following:

(i) identification of the overall strategic objectives of the LHC;

(ii) management of the LHC

(iii) overseeing and monitoring the work of the Operations Group;

(iv) setting the staffing structure of the LHC

(v) overseeing the procurement of framework agreements on behalf of the Authorities

(vi) overseeing the provision of technical advice and consultancy services provided by the LHC Operations Group.

6.2 The Joint Committee may make such other executive decisions from time to time as are necessary for the efficient operation of LHC.

6.3 Without prejudice to Paragraph 6.1 above, it is hereby declared that the following functions are reserved to each of the Authorities and shall not be within the powers of the Joint Committee:

(i) All non-executive functions of any of the Authorities.

(ii) Any decision which is contrary to or not wholly in accordance with the Budget approved by each Authority for the Joint Committee, or is contrary to an approved policy or strategy of any of the Authorities;

7. Attendance at meetings of the Joint Committee

7.1 Notwithstanding that a meeting or part of a meeting of the Joint Committee is not open to the press and public, the officers specified in Paragraph 7.2 below of each of the Authorities shall be entitled to attend all, and all parts,

of such meetings, unless the particular officer has a conflict of interest as a result of a personal interest in the matter under consideration.

7.2 The following are the officers who shall have a right of attendance in accordance with Paragraph 7.1:

(i) the Chief Executive of any of the Authorities;

(ii) the Chief Finance Officer to any of the Authorities;

(iii) the Monitoring Officer to any of the Authorities;

(iv) the Director of the LHC Operations Group

8. Financial Regulations, Officer Employment Procedure Rules and Contract Standing Orders

8.1 The Joint Committee shall operate under the Financial Regulations, Officer Employment Procedure Rules and Contract Standing Orders of the London Borough of Hillingdon ('Hillingdon').

9. Amendment of this Constitution

9.1 This constitution may be altered by resolution of a meeting of the Joint Committee supported by a majority of the members voting provided that notice in writing of such alterations has been given to the Members of the Joint Committee by the Secretary to the Joint Committee not less than 21 clear days before the meeting.

10. Lead Borough Arrangements

10.1 Hillingdon shall act as lead borough for and on behalf of all the Authorities in relation to:

(i) the employment of the staff of LHC,

(ii) insurance,

(iii) financial oversight,

(iv) the entering into of legal relations where LHC would enter such relations were it a competent legal entity, (v) Secretary to the Joint Committee.

10.2 The LHC Operations Group shall be employed by Hillingdon and the terms and conditions of staff within the LHC Operations Group shall be those used by Hillingdon.

10.3 Hillingdon shall effect insurance for all the insurable risks of LHC including employer's, public, professional and motor contingency liability insurance together with all other risks which it considers appropriate to cover, in order to protect the liabilities and assets of the Authorities.

10.4 Hillingdon shall enter all contractual and other legal relations for LHC and shall defend or settle any proceedings issued for liabilities arising from the activities of LHC.

10.5 The method of calculating the reimbursement of the costs of performing lead borough functions shall be on such basis as the Joint Committee shall from time to time approve. Calculations relating to payments of reimbursement of costs to lead boroughs shall be presented to the Joint Committee for information.

11. Indemnities

11.1 The Authorities (which for the elimination of doubt includes Hillingdon) in equal shares shall indemnify Hillingdon against any costs, losses, liabilities and proceedings which Hillingdon may suffer as a result of or in connection with its obligations herein provided that any such costs are not due to any negligent act or omission (determined at law) of Hillingdon or any breach by it of its obligations.

11.2 Hillingdon shall indemnify the Authorities against any costs, losses, liabilities and proceedings which the Authorities may suffer as a result of or in connection with any breach by Hillingdon of its obligations and/or any negligent act or omission (determined law).

12. LHC Operations Group

12.1 Notwithstanding that Hillingdon shall be the employer of the staff, the Joint Committee shall determine the structure of the staffing group from time to time to ensure that the LHC can carry out its role efficiently and effectively.

12.2 The Director shall report to the Joint Committee on all activity relating to the work of the Operations Group at least annually.

12.3 Notwithstanding that Hillingdon shall, as employer, be responsible for the staff of the LHC in circumstances where either the Joint Committee or the LHC cease to exist, the Authorities shall co-operate with each other with a view to finding continued employment for the displaced staff with one or more of the Authorities.

13. Budget

13.1 An annual budget showing forecasts and estimates for income and expenditure for the following two years shall be presented for approval by the Joint Committee annually.

14. Surpluses and deficits

14.1 The method of calculating the share of the surplus due to LHC members shall be on such basis as the Joint Committee shall from time to time approve. Calculations relating to payments of surpluses to LHC members shall be presented to the Joint Committee for information. Any deficits arising from

the activities of the LHC Operations Group shall be borne equally between the Authorities.

15. Premises

15.1 Any premises relating to the work of the LHC Joint Committee must be owned or leased by one of the Authorities.

15.2 Premises currently occupied by the LHC Operations Group are leased by the London Borough of Hillingdon.

16. Withdrawal from membership of the Joint Committee

16.1 If any of the authorities wishes to withdraw from membership of the Joint Committee that authority shall give notice to the Secretary to the Joint Committee by no later than 30 September in any year and that authority shall cease to be a member of the Joint Committee on 1 April in the following year.

16.2 From the date of giving notice up to and including 31 March in the following year the authority which has given notice shall remain a full member of the Joint Committee and shall be entitled to receive its full share of any distributed surplus or will be liable to pay its full share of any deficit, as the case may be, for the financial year in which its membership ceases.

17. Interpretation

17.1 In this Constitution the following words and phrases shall have the following meanings"

"Authority" means each of the London Boroughs of Ealing, Hackney, Haringey, Hillingdon, Islington, Tower Hamlets and Buckinghamshire County Council and "Authorities" shall mean all of these Authorities. "Council" means each [as above] and "Councils" shall mean all of these Councils.

"Director" means the officer of the London Borough of Hillingdon who acts as Director of the LHC Operations Group

"The Joint Committee" means the LHC Joint Committee comprised of members of each of the Authorities.

"LHC" means the London Housing Consortium which exists to provide specialist technical and procurement services to building programmes undertaken by participating local authorities and other public sector bodies and provides framework arrangements for such procurement services to such bodies

"The LHC Operations Group" means such team of officers from the Authorities, as the Authorities shall establish to manage LHC under the guidance of the Joint Committee.

"The Secretary to the Joint Committee" means the officer of one of the Authorities appointed for the time being by the Joint Committee to perform this function.

Appendix One Joint Committee Procedure Rules

1 Application

1.1 These procedure rules apply to all meetings of the Joint Committee, any Sub-Committee of the Joint Committee, and to decisions of individual Joint Committee Members and executive decisions taken by officers under powers delegated from the Joint Committee.

2 Allocation and Delegation of Functions

2.1 Where the Joint Committee is responsible for the discharge of a function, it may arrange for the discharge of that function by a Sub-Committee of the Joint Committee or by an officer.

2.2 Where a Sub-Committee is responsible for the discharge of a function, it may arrange for the discharge of that function by an officer.

2.3 Where a function has been delegated by the Joint Committee or a SubCommittee of the Joint Committee, the Joint Committee or Sub-Committee may at any time resume responsibility for the discharge of that function by giving notice in writing to the person or body to whom the function has been delegated, with a copy to the Secretary to the Joint Committee.

2.4 Where a Sub-Committee of the Joint Committee or officer has been given delegated powers in respect of a function, that body or person may at any time refer the matter back for decision to the body by which the power was delegated.

3 Meetings

3.1 The Joint Committee shall meet as necessary for the effective discharge of its functions. Any Sub-Committees shall meet as necessary to discharge their functions.

3.2 The Joint Committee shall meet at such time, date and location as may be determined:

(i) by the Joint Committee;

(ii) by the Chairperson of the Joint Committee or if the Chairperson is unable to act, the Vice-Chairperson;

(iii) following a request from any two members of the Joint Committee and notified to the Secretary to the Joint Committee;

(iv) following a request from the Chief Executive of any of the Authorities
and notified to the Secretary to the Joint Committee.

3.3 Meetings of Sub-Committees shall be on such time, date and location as the Sub-Committees may determine and notify to the Secretary to the Joint Committee.

4 Summons and Agenda Procedure

4.1 All meetings of Joint Committee and Sub-Committees shall be summoned by the Secretary to the Joint Committee.

4.2 Except in cases of special urgency, at least 5 clear working days before the meeting, the Secretary to the Joint Committee shall prepare and send to each member an agenda setting out:

(i) The identity of the body;

(ii) The time, date and location of the meeting;

(iii) The business to be transacted at the meeting, including:
- (a) A report concerning the finances of LHC
- (b) Any reports and recommendations from any of the Authorities;
- (c) Any reports or recommendations from the Joint Committee, or a Sub-Committee;
- (d) Any notices of motion to, or referred to, the Joint Committee;
- (e) Any petitions to, or referred to, the Joint Committee;
- (f) Any reports to be made by statutory officers of any of the Authorities;
- (g) Any matters which the Chair has notified to the Secretary to the Joint Committee for inclusion in the agenda;
- (h) Any reports to be made by the Project Director or other officers of any of the Authorities appropriate to the proper discharge of the Joint Committee's business;
- (i) Consideration of the Joint Committee's work programme
- (j) Where practicable, an indication that the Secretary to the Joint Committee is of the opinion that it is likely that the press and public will be excluded from all or part of the meeting.

4.3 No business may be transacted at a meeting which is not specified in the agenda or supplementary agenda for the meeting unless the Chairperson of the Joint Committee or Sub-Committee agrees that the item should be considered as a matter of urgency. The reason for the urgency shall be specified in the statement of decision.

4.4 The agenda shall be accompanied by any reports and documents necessary for the decision-maker(s) to discharge the business effectively. Each such report shall be in such standard form as the Secretary to the Joint Committee

may prescribe and shall include a list of all background papers which the author of the report has relied upon in compiling the report. As a matter of principle, any written report relating to a matter included in the agenda should be made available and circulated at the same time as the agenda, but where this is not practicable because of the urgent nature of the matter, the agenda will state that the report is to follow and the report will be circulated as soon as possible after the circulation of the agenda for the meeting.

5 Rights of Attendance and Audience

5.1 Agendas of the Joint Committee and of any Sub-Committee meetings and reports, except those marked “Not for Publication”, will be available for inspection on request by the public at the offices of the constituent Authorities during normal office hours.

5.2 The presumption is that all meetings of the Joint Committee and of any Sub-Committees shall be open to the public. However:

(i) Where the Secretary to the Joint Committee is of the opinion that it is likely that the press and public will be excluded from all or part of a meeting, he/she shall so indicate on the agenda and may withhold from the press and public any report or background paper which would disclose confidential or exempt information;

(ii) The Joint Committee and any Sub-Committee must exclude the press and public from any part of a meeting at which confidential information is likely to be disclosed;

(iii) The Joint Committee and any Sub-Committee may exclude the press and public from any part of a meeting:

(a) at which exempt information is likely to be disclosed; or

(b) at which officers will provide a briefing to members on a matter on which a decision is likely to be taken on the matter within the next 28 days;

5.3 Where the Joint Committee or a Sub-Committee excludes the press and public from a meeting, all members of the constituent authorities who are not members of the Joint Committee or Sub-Committee, as appropriate, shall leave the meeting unless specifically invited to remain. This provision shall not apply to:

(i) the Chief Executive of any of the Authorities;

(ii) the Chief Finance Officer to any of the Authorities;

(iv) the Monitoring Officer to any of the Authorities; (v) the Director of the LHC Operations Group.

5.4 All documents which are open to public inspection will normally be available at least five clear days before the relevant meeting. Where a report is not available when the agenda is published, the report shall be made available for public inspection when it is made available to members of the Joint Committee.

5.5 Any Member (of any of the Authorities) may:

(i) Provide the Secretary to the Joint Committee, before the day on which the meeting is to be held, with representations in writing in respect of any matter on such an agenda, in which case the Secretary to the Joint Committee shall ensure that such representations are provided to the decision-maker(s);

(ii) Attend the meeting and address the decision-maker for up to 5 minutes in respect of the matter to be decided.

5.6 Members of the public may submit to the Secretary to the Joint Committee comments in writing about any matter on an agenda for a meeting before the day on which the meeting is to be held. Where practicable, such comments will be reported to the decision-maker(s)

6 Departure Decisions

6.1 The Joint Committee and any Sub-Committee shall not take a decision which is contrary to or not wholly in accordance with an Authority's approved Budget or the Authority's approved plan or strategy for borrowing and capital expenditure, and which is not within the approved virement limits, but shall refer the proposed decision to all relevant Authorities for determination.

6.2 The Joint Committee and any Sub-Committee shall not take a decision which is contrary to an Authority's Policy Framework, but shall refer the proposed decision to all relevant Authorities for determination.

6.3 Paragraphs 6.1 and 6.2 shall not apply where the decision -

(i) is urgent (in the sense that the interests of the Authority, its area or the inhabitants of the area are at risk of suffering unacceptable damage if the decision were to be deferred.); and

(ii) the Secretary to the Joint Committee has notified the Chairperson of Scrutiny Committee of the relevant Authority or, if he/she is unable to act, the Chairperson of Council or, if he/she is unable to act, the ViceChairperson of Council of the intended decision and the reasons for urgency and that Councillor has notified the Secretary to the Joint Committee in writing that he/she agrees that the matter needs to be determined as a matter of urgency.

6.4 In each instance where an urgent decision is taken under Paragraph 6.3 above, the decision-maker(s) shall as soon as reasonably practicable after the making of the decision, submit a report to each relevant Authority setting out the particulars of:

(i) the decision which has been taken
(ii) the reasons why the decision was urgent, and (iii) the reasons for the decision itself.

6.5 The Secretary to the Joint Committee shall ensure that a report setting out each urgent departure decision is presented to the next convenient meeting of the relevant Scrutiny Committee.

7. Overview and Scrutiny

7.1 Decisions of the Joint Committee will be subject to scrutiny and call-in by the Authorities. Each of the Authorities will apply their existing overview and scrutiny arrangements to decisions of the Joint Committee.

7.2 The Secretary to the Joint Committee will publish a record of the decisions of the Joint Committee within 3 clear working days of a meeting and will send a copy of the decisions to a nominated person of each Authority.

7.3 Each nominated person will publish the record of decisions within his/her Authority on the day of notification at which point the requirements of the Authorities' Overview and Scrutiny Procedure Rules shall apply in relation to the call-in of any decision.

7.4 If a decision of the Joint Committee is not called-in in any of the Authorities by the expiration of 5 clear working days from the date on which the nominated persons were provided with a record of the decision and the Secretary to the Joint Committee has not been notified of any such call-in then the decision may be implemented forthwith.

7.5 If a decision is called-in in one or more of the Authorities, the overview and scrutiny arrangements of each Authority which has called-in the decision shall apply as if the decision was one made by that Authority's own executive. When the appropriate overview and scrutiny committee has considered the matter and determined whether or not to agree with the decision of the Joint Committee, the nominated officer of each Authority which has called-in the decision shall notify the Secretary to the Joint Committee of the outcome of such consideration.

7.6 If the decision of each relevant overview and scrutiny committee is to agree with the decision of the Joint Committee, the Secretary to the Joint Committee will notify each nominated officer and the decision may be implemented forthwith.

7.7 If the decision of one or more relevant overview and scrutiny committees is to recommend to the Joint Committee an alternative course of action, then the decision of the Joint Committee shall be held in abeyance until further consideration is given to the matter at the next appropriate meeting of the Joint Committee.

7.8 At the meeting of the Joint Committee at which the matter is considered further, the Chair of the relevant overview and scrutiny committee(s) may attend and address the Joint Committee upon the decision of his/her overview and scrutiny committee and in relation to the alternative course of action recommended.

7.9 The Joint Committee will reconsider the proposed decision and may affirm it, or amend it as it considers appropriate.

8 Rules of Procedure

8.1 The Chairperson shall preside at meetings of the Joint Committee. In his/her absence, the Vice Chairperson shall preside. In the absence of both Chairperson and Vice Chairperson, the meeting shall elect a member of the Joint Committee to preside for the duration of the meeting.

8.2 Each Sub-Committee shall elect a Chairperson. In his/her absence, the Sub-Committee shall elect a member to preside for the duration of the meeting.

8.3 At each meeting of the Joint Committee the following business will be transacted:

(i) Apologies for absence
(ii) Declarations of interest
(iii) Matters arising from the minutes of the previous meeting (iv) Matters set out in the agenda for the meeting.

8.4 The person presiding at a meeting shall conduct the meeting in accordance with these Procedure Rules.

8.5 The person presiding at the meeting may vary the order of business at the meeting.

8.6 The person presiding at the meeting may invite any person, whether a member or officer of the Joint Committee or a third party, to attend the meeting and to speak on any matter before the meeting.

9 Quorum

9.1 The quorum for a meeting of the Joint Committee or a Sub-Committee shall be three members each from a separate authority

10 Record of Attendance

10.1 All Joint Committee Members and Sub-Committee members present during the whole or part of a meeting must sign their names on the attendance sheet before the conclusion of the meeting.

11 Disorderly Conduct

11.1 If in the opinion of the person presiding, any member of the Joint Committee or of a Sub-Committee misbehaves at a meeting by persistently disregarding the ruling of the person presiding, or by behaving irregularly, improperly or offensively, or by wilfully obstructing the business of the Joint Committee or a Sub-Committee, the person presiding may move not to hear the member further. If the motion is seconded it shall be put to the vote without discussion.

11.2 If in the opinion of the person presiding, the member persistently misbehaves after such a motion has been carried, the person presiding may require the removal of the member for such period as the person presiding shall determine. The person presiding may if necessary adjourn or suspend the sitting of the Joint Committee or Sub-Committee.

11.3 If a member is required to leave a meeting under this Procedure Rule, the member is not entitled to vote during the period of exclusion.

11.4 If a member of the public or Councillor who is not a Joint Committee or Sub-Committee Member interrupts the proceedings at any meeting, the person presiding may issue a warning. If the interruption continues the person presiding may order the person's removal from the room or chamber in which the meeting is being held.

11.5 In case of general disturbance in any part of the chamber open to the public the person presiding may order that part cleared. If the person presiding considers it necessary, he may adjourn or suspend the sitting of the Joint Committee or Sub-Committee.

12 Voting

12.1 Whilst the Joint Committee shall seek to operate by consensus, matters under consideration shall be determined by a majority vote of those members present and voting

12.2 Voting is generally by a show of hands.

12.3 Any Joint Committee or Sub-Committee Member may ask for a vote to be recorded. Individual votes will then be taken by way of a roll call and recorded in the minutes so as to show how each member present and voting gave his vote.

12.4 Any Joint Committee or Sub-Committee Member may ask that his/her individual vote be recorded in the minutes.

12.5 Whenever a vote is taken by show of hands and not by roll call, the person presiding shall ask for those in favour and those against to vote in turn. He will then ask those abstaining from voting to indicate accordingly. Any member may ask for the number of those in favour, the number of those against and the number of those abstaining to be recorded in the minutes.

12.6 A member may not change his/her vote once he/she has cast it and another member has been called upon to vote.

12.7 If a member arrives before the casting of votes has been commenced he/she is entitled to vote.

12.8 Immediately after a vote is taken any member may ask for it to be recorded in the minutes that he/she voted for or against the question, or that he/she abstained.

12.9 A matter shall be considered to be approved if it receives the votes of a majority of those members entitled to vote who are present and voting. In the event that the votes cast for and against a proposal are equal, the person presiding, will have a second and/or casting vote. There shall be no restriction on the manner in which the casting vote is exercised.

12.10 Where there are more than two persons nominated for any position to be filled by the Joint Committee or a Sub-Committee, and no person receives more than one half of the votes given, the name of the person having the least number of votes will be struck off the list and a fresh vote taken, and so on until a clear majority of votes is given in favour of one person.

13 Recording the Decision

13.1 The person presiding shall be responsible for ensuring that the Secretary to the Joint Committee is clear as to the decision taken and the reasons for that decision.

13.2 The Secretary to the Joint Committee shall then, as soon as reasonably practicable after the end of the meeting, prepare a statement of the decisions taken at the meeting, including:

(i) The Joint Committee and Sub-Committee and other members of the Authorities attending the meeting
(ii) Any disclosures of personal or prejudicial interests

(iii) The decisions taken and the date of those decisions
(iv) Whether the decision is urgent and should be implemented directly
(v) A summary of the reasons for the decision
(vi) The options which were considered at, but rejected by, the meeting

The Secretary to the Joint Committee may consult the person presiding at the meeting as to the matters to be recorded in the minute.

13.3 Where the statement of decision(s) would disclose confidential or exempt information, the Secretary to the Joint Committee shall produce a formal statement of decisions of the meeting and a summary of the decisions taken at the meeting excluding such confidential and exempt information but providing a coherent account of the matters decided.

13.4 Where the decision is a decision upon a reconsideration of a decision on a Call-In by a Scrutiny Committee, the Secretary to the Joint Committee shall be responsible for reporting that reconsideration decision to the Scrutiny Committee.

13.5 The Secretary to the Joint Committee shall be responsible for circulating the statement of decisions to officers of the authority responsible for the implementation of the decision(s).

14 Implementing decisions

14.1 Decisions shall not be implemented until 5 clear days from the publication of the statement of decision(s) of the meeting or the decision.

14.2 Paragraph (a) shall not apply where the author of any report has stated therein, or the decision-maker(s) have determined, that the matter is urgent and that the interests of one or more of the constituent authorities, its area or the inhabitants of the area are at risk of suffering unacceptable damage if the decision were not to be implemented directly.

14.3 Where a non-urgent decision is called in by a Scrutiny Committee before it is implemented, implementation of the decision will be deferred until the decision-maker has had the opportunity to consider any request from the Scrutiny Committee for the re-consideration of the matter.

MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON FRIDAY, 4TH MARCH, 2022, 2.00 - 2.35 PM

PRESENT: Councillor Isidoros Diakides – Cabinet Member for Finance and Transformation.

In attendance: Andrew Meek, Head of Organisational Resilience; Gloria Ighodaro, Capital Projects Manager; Richard Kiernan, Senior Project Manager; Jonathan Kirby, Assistant Director for Capital Projects and Property; and Fiona Rae, Acting Committees Manager.

130. APOLOGIES FOR ABSENCE

There were no apologies for absence.

131. DECLARATIONS OF INTEREST

There were no declarations of interest.

132. AWARD OF CONTRACT FOR WOOD GREEN LIBRARY 2ND & 3RD FLOOR OFFICE AND MECHANICAL & ELECTRICAL REFURBISHMENT

The Cabinet Member for Finance and Transformation considered the report which sought approval to award a contract for the 2nd & 3rd floor office and Mechanical & Electrical refurbishment at Wood Green Library to improve the office and service provision facilities for Haringey Works on the 2nd floor; and to enable the interim relocation of departments currently occupying Alexandra House to the 3rd floor.

It was noted that a number of services operated in Wood Green Library and that this included the Cabinet Member for Early Years, Children, and Families, Cabinet Member for Customer Service, Welfare, and the Public Realm, Cabinet Member for Employment, Skills, and Corporate Services, and Cabinet Member for House Building, Placemaking and Development. It was confirmed that the Cabinet Members had been informed and did not have any concerns about the proposals.

The Cabinet Member RESOLVED

1. In accordance with Contract Standing Order 16.02, to approve the award of the Contract for works at Wood Green Library to Contractor A for the contract sum of £539,603.18 excluding VAT.

2. To approve the contingency sum as set out in the exempt section of this report (Part B).

Reasons for decision

To improve the Employment and Skills offer, creating a flagship service for vulnerable resident

The Employment and Skills Recovery Action Plan identified that the current Haringey Works Hub in Wood Green Library was unfit for purpose for a flagship service working with vulnerable residents. This proposal will create private interview rooms, a space for delivering group sessions and a welcoming more environment with improved equipment and facilities.

The proposed improvements to the Haringey Works Hub would provide a professional and welcoming base where residents can have private one to one meetings with their employment advisor or finalise employment checks if they are joining the Temp Recruitment talent pool, a space to carry out job search with support of the team, and to participate in group employability and upskilling workshops.

Heating and ventilation improvements for library users

This package of works includes some improvements to the heating and ventilation systems and associated control systems. This will resolve some longstanding problems with ensuring the library is kept at a comfortable temperature for staff and visitors alike.

It will also deliver financial savings and environmental benefits by reducing energy consumption.

To deliver the Council's Accommodation strategy objectives

In November 2021, Cabinet approved a proposal to refurbish Alexandra House and 48 Station Road, and to tender the associated works packages. The report set out that, in addition to the appointment of a main contractor, it would be necessary to undertake some of the works at an earlier stage.

To support the delivery of the Accommodation programme, it is intended to relocate the Council's Digital Contact Centre from Alexandra House to the 3rd floor of Wood Green Library.

The relocation of the Digital Contact Centre to Wood Green Library is an interim arrangement to allow the realisation of the wider consolidation of the Council's core office accommodation into Alex House and 48 Station Road. This interim arrangement does not impact any long-term decisions that may be taken separately over the future use of the Wood Green Library site.

To deliver service management improvements within Customer Services

This location will provide co-location and synergies for Customer Services colleagues located on the ground floor of Wood Green Library and those working in the Contact Centre.

The renovation works proposed in the office section and break-out area on the 3rd floor of Wood Green library will provide an improved working environment and re-allocation of space to current occupants: Libraries management team, libraries stock management, Home library service and Haringey Adults Learning Services (HALS) back-office.

Alternative options considered

Do Nothing

Haringey Works, being a front-line service, offering essential reemployment advice to local residents following the end of the furlough scheme urgently need a dedicated, and far improved space to offer their services. Not undertaking this part of the works will hinder Haringey Works in providing a professional and essential service which is essential to the prospects of some of the most disadvantaged residents in the borough.

Not to upgrade to heating and ventilation systems has been discounted as the Council has a statutory duty to ensure all our building are fit for purpose and safe for all users. Ventilation control is at the forefront of building design following the COVID-19 pandemic. By doing nothing, we are not fulfilling this obligation.

The option not to move the Digital Contact Centre is not recommended, as the Council would not be able to meet its Accommodation Strategy objectives. A variety of factors have been considered when determining how to allocate space to services. Moving the Digital Contact Centre to the library, frees up half a floor of Alexandra House, which will be better suited for use by other departments.

Refurbish 3rd Floor as part of the main Accommodation programme

This option would be for the Council not to commission refurbishment of the 3rd floor of Wood Green Library at an early stage. This work is currently programmed to start in early March 2022 subject to approval. The refurbishment of the Haringey Works area could go ahead as a smaller works package.

This would significantly delay the relocation of the Contact Centre and Customer Experience management team occupying the 3rd floor of Alexandra House. The 3rd floor of Alexandra House is due to be vacated by 20 May 2022 for refurbishment works to commence on 23 May 2022. Delaying this would have knock on implications for the whole programme.

As the contractor for the main programme would need to consider works for an additional site, this would add considerably to the overall cost.

Separate Construction Contracts for 2nd & 3rd Floor Refurbishment Projects

The option to tender the 3rd floor separately was discounted at an early stage. The refurbishment works on both floors are of a time-critical nature and this would have meant that both contracts would have needed to run concurrently. This would have

resulted in two contractors, working alongside each other, to complete the refurbishment works.

This option would also contravene the Construction Design and Management Regulations 2015 and create a number of significant H&S issues, as two contractors would be sharing the same site. As a result, one of the contractors would need to become the Principal Contractor, overseeing the other contractor. This would have resulted in a cost uplift for the contractor chosen as the Principal Contractor.

This option would also result in higher charges (Preliminaries) overall, as each contractor would charge for work that would only be needed once in the preferred option.

133. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

That the press and public be excluded from the remainder of the meeting as item 5 contained exempt information, as defined in Section 100a of the Local Government Act 1972 (as amended by Section 12A of the Local Government Act 1985); paras 3 and 5, namely information relating to the financial or business affairs of any particular person (including the authority holding that information) and information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

134. EXEMPT - AWARD OF CONTRACT FOR WOOD GREEN LIBRARY 2ND & 3RD FLOOR OFFICE AND MECHANICAL & ELECTRICAL REFURBISHMENT

The Cabinet Member considered the exempt information.

The Chair of Overview and Scrutiny has been informed that it was impracticable to give 28 days' notice of the decision. The Wood Green Library project is combining two separate, small projects into a single piece of work. This is due to practicalities, safety, and value for money considerations. It is impracticable to give 28 days' notice because delay to the work on the 3rd floor of Wood Green Library would have a knock-on impact on the council's accommodation programme which, in turn, would lead to higher costs.

Given the above, it is not practicable to comply with the 28-day notice requirement in Part Four, Section D, Rule 13 of the constitution. This is set out in Part Four, Section D, Rule 16, of the Constitution.

CABINET MEMBER: Cllr Isidoros Diakides

Signed by Cabinet Member ……

Date …8 March 2022…….

MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON MONDAY, 7TH MARCH, 2022, 9.00 - 9.10 AM

PRESENT: Councillor Mike Hakata, Cabinet Member for Environment, Transport and the Climate Emergency.

In attendance: Danny Gayle, Engineering Projects Manager; Simi Shah, Group Engineer – Traffic and Parking; Andrew Bourke, Team Manager Parking Schemes; Peter Boddy, Highways and Traffic Manager; Mark Stevens, Assistant Director Direct Services; and Fiona Rae, Acting Committees Manager.

135. APOLOGIES FOR ABSENCE

There were no apologies for absence.

136. DECLARATIONS OF INTEREST

There were no declarations of interest.

137. PROPOSED CYCLING IMPROVEMENTS ALONG STATION ROAD N22

The Cabinet Member for Environment, Transport and the Climate Emergency considered the report which reported on the feedback of the statutory consultation carried out from 20 October to 10 November 2021, on proposals to improve protection for cyclists using the northbound and southbound cycle lanes along Station Road from the junction with High Road to the junction with Park Avenue.

The report also sought approval to proceed to implementation, having considered objections received to the statutory consultation.

The Cabinet Member RESOLVED

To approve the implementation of the Station Road cycling improvement scheme, as set out in the plan in Appendix A, which includes:

(a) Converting the northbound advisory cycle lanes on Station Road from the junction with High Road to the junction with Park Avenue to mandatory cycle lanes and the single kerb blips to double kerb blips.

(b) Converting the southbound advisory cycle lane on Station Road between its junction with High Road to its junction with Mayes Road, outside St Pauls Church to No. 76 Station Road and from its junction with Park Avenue to 138 Station Road to mandatory cycle lane and the single kerb blips to double kerb blips.

(c) Adding protection for cyclists by replacing the existing wand and mini orcas with longer poles installed inside the markings of the new mandatory cycle lanes where the widths of the cycle lanes exceed 1.65m.

Reasons for decision

The Council is required to consider the feedback received during the statutory notification period, in particular any objections to proposals, prior to proceeding to implementation. The proposed changes will make it safer for cyclists using these lanes as motor vehicles will not be allowed to enter the mandatory cycle lanes.

Alternative options considered

The proposals consulted upon included the moving of the parking bays located between 98 and 138 Station Road to outside of the existing advisory cycle lane, allowing the southbound cycle lane along Station Road between Park Avenue and Mayes Road to be made mandatory. This included removal of the widened footway at the junction with Barratt Avenue in order to provide a continuous cycle lane, negating the need for cyclists to weave in and out. However, following further site analysis, the road widths in this section were found to be too narrow, meaning these changes would result in the cycle lanes on both sides of the road being substandard and not meeting minimum widths set out in the London Cycling Design Standards (LCDS). For these reasons and following further discussions with Haringey Cycling Campaign, it was agreed that these measures would not be recommended for approval and instead a more holistic solution would be sought for this section, which would consider continuity towards Alexandra Palace and Bounds Green. This is subject to funding being identified to undertake this feasibility work.

The proposal also included replacing the existing wand and mini orcas (small units laid inside the cycle lane markings) with longer poles installed inside the lane of the new mandatory cycle lanes. These were proposed to be provided at regular intervals providing a safe barrier between the cyclist and motor traffic. As the road widths were found to be too narrow for the section of Station Road between Park Avenue and Mayes Road to accommodate wide cycles lanes to meet LCDS, the poles are now recommended to only be provided in sections of the cycle lanes where the widths exceed 1.65m, which would allow a clear width of 1.5m to be retained for use by cyclists.

138. SCHOOL STREETS (BATCH 1A AND 1B) - REVIEW OF 10 SCHOOL STREETS INTRODUCED UNDER EXPERIMENTAL TRAFFIC MANAGEMENT ORDER PROCEDURES

The Cabinet Member for Environment, Transport and the Climate Emergency considered the report which reported the impact of 10 School Streets introduced on an experimental basis across the borough between November 2020 and April 2021. The report also asked the Cabinet Member to consider any statutory objections made to the associated traffic orders and sought approval to make all 10 School Streets permanent.

The Cabinet Member RESOLVED

1. To note the outcome of the trial/experimental period of the 10 School Streets, as detailed in the Monitoring Report (Appendix A);

2. To consider the scheme objections (Appendix B) and officer's responses to the themes raised (Appendix C);

3. To approve the amendment (a reduction) to the hours of operation of Rokesly School Street to 8:15am to 9:15am and 2:45pm to 3:45pm, for reasons given in paragraph 8.9 and 8.10;

4. To approve the making permanent of the 10 School Streets, subject to the outcome of any statutory traffic order procedures.

Reasons for decision

As set out in Haringey Council's School Streets Plan1, the Council took the decision to implement its School Streets using experimental traffic orders (ETOs).

The procedures for an ETO are defined by legislation2. An ETO can last for a maximum of 18 months and will involve a 6-month statutory consultation that runs concurrently with the delivery of a scheme. After 6 months (but before 18 months), the Council must decide whether to revoke the ETO, amend the ETO (and invoke another 6-month consultation window) or make the order, and thus the scheme, permanent.

The use of ETOs has enabled the swift implementation of School Streets and were, in part, driven by a need to respond to the pandemic and to support social distancing and reduce the risk of a damaging car-led recovery. ETOs have allowed the Council and the public to assess the schemes in operation, rather than try and predict their impact. Implementation using ETOs also encourages local residents who may otherwise be unaware of proposals to gain a sense of how well they think a scheme is working and provide feedback on that basis.

As the latter half of the 18-month ETO period is being reached, it is now necessary for the Council to take a decision on whether to make permanent the 10 School Streets schemes that were introduced in late 2020 and early 2021.

The 10 School Streets under consideration in this report are:

1. Chestnuts School (SS02)
2. Campsbourne Primary School (SS03)
3. Coldfall Primary School (SS04)
4. Earlsmead Primary School (SS06)
5. Highgate Primary School and Blanche Neville School for the Deaf (SS10)
6. Holy Trinity Primary School (SS11)
7. Rokesly Infants and Junior School (SS13)
8. St Pauls Catholic Primary School (SS16)
9. Tiverton Primary School (SS17)
10. Welbourne Primary School (SS18)

The decision to make permanent the above 10 schemes is based upon the evidence collected during the ETO period and the positive benefits that the School Streets have delivered in terms of:

i. Reduced congestion and car use near schools
ii. Reduced road danger and improved safety for pupils and parents/carers travelling to and from school
iii. Encouraged active travel to schools
iv. Improved air quality around schools

Alternative options considered

Do Nothing – i.e. *let the experimental traffic orders lapse*

This option was rejected as it would mean the Council would need to remove the infrastructure associated with the 10 School Streets listed in paragraph 4.5.

The Council would therefore fail to deliver on the motion passed by Full Council in March 2019, which set out a commitment to deliver School Streets at primary schools across the borough.

Failure to deliver these School Streets would be contrary to the objectives set out in the Borough Plan, the Transport Strategy, the Climate Change Action Plan and the Draft Walking and Cycling Action Plan.

Allow a further six months of experimental operation before a decision is made.

This option was rejected due to the pressure on resources required to review and then deliver any change within a shorter time period.

Alongside this, there is evidence from other School Streets across London that little would change or be gained within an extra 6-month time period.

If time runs out on the ETO, the default position is that it lapses and is no longer enforceable. This would allow no time for any delays in making the School Streets permanent.

CABINET MEMBER: Cllr Mike Hakata

Signed by Cabinet Member ……

Date …8 March 2022…….

MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON MONDAY, 7TH MARCH, 2022, 10.00 - 10.25 AM

PRESENT: Councillor Seema Chandwani, Cabinet Member for Customer Service, Welfare, and the Public Realm.

In attendance: Matthew Middup, IT Procurement and Software Management Officer; David Graaff, Head of Service Delivery; Mark Stevens, Assistant Director for Direct Services; Ann Cunningham, Head of Highways and Parking; and Fiona Rae, Acting Committees Manager.

139. APOLOGIES FOR ABSENCE

There were no apologies for absence.

140. DECLARATIONS OF INTEREST

There were no declarations of interest.

141. CONTRACT VARIATION FOR PROVISION OF MOBILE NETWORK VOICE AND DATA SERVICES

The Cabinet Member for Customer Service, Welfare, and the Public Realm considered the report which sought approval under Contract Standing Order 10.02.1 b), where the value is £500,000 (five hundred thousand pounds) or more, and subject to the provisions of Public Contract Regulations 2015 (PCR) 72(1) (b) (i) & (ii) for the extension and variation to the Mobile Network Voice and Data Services contract awarded to EE Ltd.

The contract award would be for a period of no more than 12 months, with a value of up to £204,000.00, to commence on 1 April 2022. The total aggregated contract value was up to £1,022,000.00, over the 5-year term.

It was noted that this decision needed to be taken so that the Mobile Network Voice and Data Services contract for the Council was maintained. A new contract would be procured and in place before 1 April 2023.

The Cabinet Member noted that the contract would be extended for 12 months and enquired how the council would be ensuring timely and strong arrangements for future contracts. The IT Procurement and Software Management Officer explained that a new framework was due to be published in June for the provision of mobile network voice and data services contract. It was added that the extended contract was for 12 months but was a rolling 30 day arrangement which would allow the council to transition to a new contract when convenient.

The Cabinet Member RESOLVED

1. To approve the implementation of Contract Standing Order 10.02.1 (b) and Contract Standing Order 16.02 and award the extension and variation for the Mobile Network Voice and Data Services contract to EE Ltd, for a period no longer than 12 months, from 1 April 2022.

2. The contract value will not exceed £204,000.00, over the 12-month variation term, with a total aggregated contract value of up to £1,022,000.00.

Reasons for decision

The current contract is due to expire on 30th March 2022. Therefore, this variation is being presented to Cabinet Member to ensure the continuity of all mobile network voice and data services used by the London Borough of Haringey and Homes for Haringey.

An open tender to procure a new contract for the Council's Mobile Network Voice and Data Services was issued on 19th November 2021, with the provision of a new service scheduled for 1st April 2022. Of the submissions received, none were compliant, and the decision was taken to cancel the procurement, with no new contract being let.

Alternative options considered

There are 2 alternative options available:

Retender – not an option as we do not have sufficient time to carry out a compliant procurement.

No Action – do not award a contract extension and allow the existing contract to end. This option has a high level of risk. The implications of not having a contract are:
- Special tariff rates and discounts could revert to increased standard rates
- Possible disruption to mobile network services

142. DISCRETIONARY HOUSING PAYMENTS POLICY

The Cabinet Member for Customer Service, Welfare, and the Public Realm considered the report which noted that, each year, the Department for Work and Pensions (DWP) made grants available to local authorities for Discretionary Housing Payment (DHP) purposes. The report was brought to the Cabinet Member with an updated DHP policy to reflect the new funding allocation.

It was noted that the main objective of the DHP policy was to prevent homelessness and to sustain existing tenancies where possible.

The Head of Service Delivery reported that, on 24 February 2022, the DWP had issued subsidy circular S1/2022. This stated that:
- The total amount of DHP funding for England and Wales for FYE March 2023 was £100 million.

- £98 million of funding would be allocated in April 2022 for the FYE March 2023. Haringey had a funding allocation of £1,168,397.
- DWP was reserving £2 million of DHP funding until later in the year. DWP would provide further information about how this funding would be allocated in due course.

The Cabinet Member noted that the allocation was reducing fairly significantly each year and expressed concerns about the reduction in welfare spending. It was noted that Cabinet was still due to be notified of the figure in the Quarter One budget monitoring report.

The Cabinet Member RESOLVED

1. To approve Haringey's Discretionary Housing Payments Policy 2022/23 (see Appendix A) as the methodology to determine the award of individual Discretionary Housing Payments during the financial year 2022/23 having regard to the Equalities Impact Assessment (set out in Appendix B).

2. At the time of writing this report, the Department for Work and Pensions (DWP) have not confirmed the Discretionary Housing Payment allocation to Haringey for 2022/23. If notification arrives after this Cabinet meeting, Cabinet will be notified of the figure in the Quarter One budget monitoring report.

3. It was noted that, after the report had been published, the Department for Work and Pensions (DWP) had issued subsidy circular S1/2022. This stated that:

- **The total amount of Discretionary Housing Payment (DHP) funding for England and Wales for Fiscal Year End (FYE) March 2023 was £100 million.**
- **£98 million of funding would be allocated in April 2022 for the FYE March 2023. Haringey had a funding allocation of £1,168,397.**
- **DWP was reserving £2 million of DHP funding until later in the year. DWP would provide further information about how this funding would be allocated in due course.**

Reasons for decision

The DHP Policy must be reviewed and approved every year in line with the changing funding allocated by the DWP.

Alternative options considered

None.

143. FLOOD WATER MANAGEMENT INVESTMENT PLAN

The Cabinet Member for Customer Service, Welfare, and the Public Realm considered the report which noted that it was widely recognised that the combined effects of climate change and continuing urban development would give rise to increased flood risk. In London alone, there were many properties that were deemed

at risk of flooding. Haringey as well as several other London boroughs experienced flooding from extreme rainfall on two occasions in July 2021.

Haringey was responsible for taking the lead in managing flood risk from surface water, groundwater, reservoir, rivers, and some of the smaller watercourses. In 2010, the Flood and Water Management Act came into effect, and this required the Council to take on the role of 'lead local flood authority' (LLFA) for the Haringey area.

It was not possible to completely stop flooding, but steps could be taken to reduce the effect through measures including that of highways drainage resilience works and schemes to prevent unmanaged flooding.

The Flood Water Management Investment Plan (FWMIP) set out the capital investment programme for 2022/2023. Appendix 1 set out the proposed allocation of schemes within the overall programme. This programme had been developed to meet the objectives in the Haringey Local Flood Risk Management Strategy.

The schemes proposed in the Flood Water Management Investment Plan were a 'living document' of proposals which were developed as the Council understood the various issues that had an impact on flooding.

In response to a question from the Cabinet Member, it was noted that officers were hopeful that there would be Greater London Authority (GLA) funding for the Chestnuts Park rainwater masterplan scheme and a decision was expected shortly.

The Cabinet Member RESOLVED

1. To approve the Flood Water Management Investment Plan for the 2022/23 financial year as set out in the attached Appendix 1.

2. To delegate decisions relating to flood water management scheme design and implementation to the Head of Highways and Parking.

3. To authorise the Head of Highways and Parking to carry out any required consultation in accordance with Appendix 2 and to make any necessary traffic orders, having had due regard to any prior consultation, to give effect to those schemes.

4. To authorise the Head of Highways and Parking to consider any objections and representations and to report back to the Cabinet Member for Customer Service, Welfare and the Public Realm if there are significant or substantial objections or concerns raised; and

5. To agree to a review of policy to allow a more robust approach in dissuading the conversion of existing property frontages from soft landscaping to hard landscaping in the face of the global climate crisis.

6. To agree to vire £355k from the Borough Roads budget to the Flood Water Management budget.

Reasons for decision

The FWMIP sets out the Council's flood water management and highways drainage resilience projects for the coming financial year and how they align with the Council's strategic objectives.

The report provides detail of the funding arrangements, seeks authority to proceed with the development and delivery of these projects. Some of those projects will be subject to appropriate consultation.

Alternative options considered

No other options were considered. The Council has a statutory obligation to maintain the public highway network. The Council is the lead local flood authority in the borough and is responsible for taking the lead in managing flood risk from surface water, groundwater, reservoir, rivers and some of the smaller watercourses. This 2022/23 investment plan has been informed by the Council's Transport Strategy, Local Flood Risk Management Strategy and a developing Asset Management Strategy. The projects proposed are those that have already been identified as priorities to further reduce the risk of future flooding in the borough.

The funding for the proposed projects comes from Council resources approved by Cabinet as part of the Capital Programme and from external grants or contributions that have been received or are proposed.

144. HIGHWAYS AND STREET LIGHTING INVESTMENT PLAN

The Cabinet Member for Customer Service, Welfare, and the Public Realm considered the report which made recommendations for investment in Haringey's highways infrastructure during 2022/23 and particularly covered footway, carriageway and street lighting assets, as well as providing details of some traffic schemes. The report also provided an update on the insourcing of highways reactive maintenance.

Investment in Haringey's local highways network was critical to delivering the Council's ambitions to make Haringey a better and safe place to live, encouraging growth and attracting investment, and creating opportunities that all can share in.

The investment recommended in this report had been identified to meet the Borough Plan objectives and the Transport Strategy. The key objectives within the Transport Strategy were as follows:

- A public transport network that is better connected, has greater capacity and is more accessible, supporting our growth ambitions;
- A well-maintained road network that is less congested and safer;
- Active travel the easier choice, with more people choosing to travel by walking or cycling;
- Improved air quality and a reduction in carbon emissions from transport.

Appendices 1, 2 and 3 of this report set out the recommended investment and, where relevant, expected funding streams for 2022/23 for various works to highways infrastructure assets and on the local highway network.

The plan – which covered a number of service areas – would be collectively referred to as the Highways and Street Lighting Investment Plan (HSLIP).

The Cabinet Member RESOLVED

1. To approve the investment of £8.754m in highway assets for 2022/23, as set out in Appendix 1 of this report;

2. To approve the investment of £1.3m in lighting assets for 2022/23, as set out in Appendix 2 of this report;

3. To approve and note the investment of £0.350m in traffic schemes for 2022/23, as set out in Appendix 3 of this report;

4. To delegate decisions relating to highways infrastructure asset maintenance, and highways and traffic improvement scheme design and implementation to the Head of Highways and Parking;

5. To authorise the Head of Highways and Parking to carry out any required consultation in accordance with Appendix 4 and to make any necessary traffic management orders, having had due regard to any prior consultation, to give effect to those schemes;

6. To authorise the Head of Highways and Parking to consider any objections and representations on highways and traffic improvement schemes and to report back to the Cabinet Member for Customer Service, Welfare and the Public Realm if there are significant or substantial objections or concerns raised; and

7. To note the progress made on the insourcing of highways reactive maintenance.

Reasons for decision

This report sets out the 2022/23 investment in the Council's local highways infrastructure, the improvements that are planned, the programme for the future potential insourcing of highways reactive maintenance and how these activities align with the Council's strategic objectives.

The report provides detail of the funding arrangements and seeks authority to proceed with the development and delivery of these projects, subject to appropriate consultation.

Alternative options considered

Allocated funding is insufficient to cover all existing maintenance needs, so the proposals prioritise the essential works that need to be delivered. The 2022/23 investment plan has been informed by the Council's Transport Strategy, the Local

Investment Plan (LIP) - which involved consultation with key stakeholders - and the emerging, updated Highways Asset Management Plan.

The maintenance works programmes are prioritised through visual inspections and highway condition surveys by officers, and concerns raised by Members and by the wider community.

The lantern and column replacement programme for street lighting is developed around electrical and structural condition surveys, scouting, road hierarchy, visual inspections, lighting levels, and regeneration all to ensure that investment is targeted where most needed.

145. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

That the press and public be excluded from the remainder of the meeting as item 8 contained exempt information, as defined in Section 100a of the Local Government Act 1972 (as amended by Section 12A of the Local Government Act 1985); paras 3 and 5, namely information relating to the financial or business affairs of any particular person (including the authority holding that information) and information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

146. EXEMPT - CONTRACT VARIATION FOR PROVISION OF MOBILE NETWORK VOICE AND DATA SERVICES

The Cabinet Member considered the exempt information.

CABINET MEMBER: Cllr Seema Chandwani

Signed by Cabinet Member ……

Date …8 March 2022……

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MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON MONDAY, 7TH MARCH, 2022, 12.00 - 12.10 PM

PRESENT: Councillor Julie Davies, Cabinet Member for Employment, Skills, and Corporate Services.

In attendance: Elena Pippou, Cultural Officer; Flo Armstrong, Library Strategy Development Manager; Charlotte Pomery, Assistant Director for Commissioning; and Fiona Rae, Acting Committees Manager.

147. APOLOGIES FOR ABSENCE

There were no apologies for absence.

148. DECLARATIONS OF INTEREST

There were no declarations of interest.

149. JACKSONS LANE FUNDING AGREEMENT

The Cabinet Member for Employment, Skills, and Corporate Services considered the report which sought the decision for the continuation of funding to Jacksons Lane of £110,000 a year for a further five years, covering the period until financial year 2026/2027.

The Cabinet Member RESOLVED

To approve the continuation of the grant funding of the sum of £110,000 annually to Jacksons Lane starting from financial year 2022/23 for a five-year period running to 2026/2027.

Reasons for decision

The decision is being put forward for consideration for the following reasons.

Jacksons Lane is a key cultural provider in the London Borough of Haringey and requires a revenue contribution to its core staffing and service delivery costs in order to deliver its outcomes. The revenue contribution from the Council supports the centre's National Portfolio Organisation (NPO) status and attracts match funding from the Arts Council meaning that for each year between 2018/22 Jacksons Lane attracted additional funding of £129,742. The role of NPOs is to act as leaders in their areas, with a collective responsibility to protect and develop the national arts and cultural ecology. Jacksons Lane is due to submit its repeat application for NPO status in April 2022.

The funding will enable the delivery of cultural outreach programmes for older adults, children and young people across the borough, reaching communities who are not always able to access an arts and culture offer. In order to operate in this way, the organisation has established excellent partnership working with a range of partners to support its service delivery.

Jacksons Lane actively supports borough-wide initiatives such as Haringey Creates, Cultural Impact Award and Culture Board and the contribution to Jacksons Lane core activities will assist Haringey Council's delivery of its Borough Plan objectives as set out in Section 7. In addition, Jacksons Lane directly provides world class arts and culture in Haringey, particularly in the area of mime and circus art.

Jacksons Lanes' activities ensure that a significant return is made on the local authority's investment, including capital, through contributing to the local economy and attracting a wide range of external funding.

Alternative options considered

Jacksons Lane are a Haringey based venue, the services that they provide cannot be provided in an alternative manner and therefore there were no other viable alternatives.

CABINET MEMBER: Cllr Julie Davies

Signed by Cabinet Member ……

Date …8 March 2022…….

MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON TUESDAY, 8TH MARCH, 2022, 10.00 - 10.05 AM

PRESENT: Councillor Ruth Gordon, Cabinet Member for House Building, Place-Making, and Development.

In attendance: Yvonne Robinson, Housing Delivery Project Manager; Robbie Erbmann, Assistant Director for Housing; Bruno Bridge, Senior Housing Project Manager; Matthew Maple, High Road West Lead; Hamza Farah, Housing Delivery Project Manager; Anna Blandford, Head of Housing Development; Peter O'Brien, Assistant Director for Regeneration and Economic Development; and Fiona Rae, Acting Committees Manager

150. APOLOGIES FOR ABSENCE

There were no apologies for absence.

151. DECLARATIONS OF INTEREST

There were no declarations of interest.

152. LETTING OF BUILD CONTRACT FOR TOPHAM AND RISLEY

The Cabinet Member for House Building, Place-Making, and Development considered the report which sought approval, in the light of consultation with local residents, to build four new Council homes on Council-owned land at Topham Square and Risley Avenue, in the White Hart Lane Ward. The homes comprise 1 two-bedroom house, 2 three-bedroom houses and 1 four-bedroom house, all of which will be let at Social Rents.

In order to achieve this, the report asked to agree the appropriation of the land, first for planning purposes, and then, on completion, for housing purposes; and in light of a formal tender process to award a construction contract to a locally based firm, NFC Homes Limited.

The Cabinet Member for House Building, Place-Making, and Development noted that the Cabinet Member portfolio had been updated from the Cabinet Member for Housing and Estate Renewal to the Cabinet Member for House Building, Place-Making, and Development.

The Cabinet Member RESOLVED

1. To consider the responses to the consultation carried out on this proposed scheme in line with section 105 of the Housing Act 1985, as set out in the report, and the wider community engagement set out in the report.

2. To approve the direct appointment allowed by Contract Standing Order 10.01.2.d of NFC Homes Limited to undertake the new build works to provide a total of four new homes at Topham Square and 15-25 Risley Avenue car park for the contract and contingency sum set out in the exempt report attached as Appendix 2.

3. To approve the appropriation of the land at Topham Square and 15-25 Risley Avenue car park (edged red in the plans attached at Appendix 1) from housing purposes to planning purposes under Section 122 of the Local Government Act 1972 as it is no longer required for the purpose which it is currently held, and for the purpose of carrying out development as set out in section 6 of this report.

4. To approve the use of the Council's powers under Section 203 of the Housing and Planning Act 2016 to override easements and other rights of neighbouring properties infringed upon by the Topham Square and Risley Avenue development under planning ref: HGY/2022/0018.

5. To delegate to the Director of Housing, Regeneration and Planning, after consultation with the Director of Finance and the Cabinet Member for ~~Housing and Estate Renewal~~ **House Building, Place-Making, and Development**, authority to make payments of compensation in the event that any infringement arises from the development and the recommendation 3, within the existing scheme of delegation.

6. To approve the appropriation of the land at Topham Square and Risley Avenue Road car park (edged red in the plan attached at Appendix 1) from planning purposes back to housing purposes under Section 19 of the Housing Act 1985, after practical completion of the development.

Reasons for decision

The land at Topham Square and Risley Avenue was approved by Cabinet in July 2019 to be included in the Council's Housing Delivery programme. A planning application was submitted on 4 January 2022 and a decision is expected by 1 March 2022. Subject to planning approval, the scheme is ready to progress to the construction phase. This report therefore marks the third, and final, Members' decision to develop on these sites.

Direct appointment of the contractor in this case is justified because it is in the Council's overall interests. Current market conditions are uncertain and difficult, and there is significant risk of a lack of interest in this scheme. The scheme's viability depends on meeting deadlines attached to grant funding and the risk of an unsuccessful competitive tender process was considered to be high, and therefore to put the scheme's viability at risk. A locally based contractor known to have provided the Council with quality work on similar schemes was approached and asked to submit a tender return.

The appropriation of the site for planning purposes is required as it will allow the Council to use the powers contained in Section 203 to override third party rights such as easements and other rights of neighbouring properties and will prevent injunctions that could delay or prevent the Council's proposed development. Section 203 converts the right to seek an injunction into a right to compensation. The land will need to be

appropriated back from planning purposes to housing purposes on completion of the development to enable the Council to use the land for housing and let the new Council homes at Council rent.

The proposals will improve security for new and existing residents and alleviate potential anti-social behaviour and fly tipping attracted by an unsecured car park.

Alternative options considered

It would be possible not to develop this site for housing. However, this option was rejected as it does not support the Council's commitment to deliver a new generation of Council homes.

The Council could have run a competitive tender from the London Construction Programme (LCP). This option was rejected due to limited interest from the LCP framework contractors and the time constraints involved in delivering this scheme Instead, this opportunity will be procured via a direct appointment from the Major Works 2019 LCP Framework Agreement, the recommended route for a contract of this value.

The Council could continue with the scheme without appropriating the site for planning purposes, but this would risk the proposed development being delayed or stopped by potential third-party claims. By appropriating it for planning purposes and utilising the powers under Section 203 of the Housing and Planning Act 2016 (HPA 2016), those who benefit from third party rights will not be able to seek an injunction since those rights or easements that are overridden are converted into a claim for compensation only. The Council recognises the potential rights of third parties and will pay compensation where a legal basis for such payments is established. The housing delivery team actively engaged with local residents about the development of this site as they proceeded through the feasibility and design stages and any comments or objections raised were taken into consideration in reaching its decision.

The Council could decide not to appropriate the land for housing purposes upon practical completion of the building works. This option was rejected because it could prevent the Council from being able to offer up these homes for occupation as social housing thereby not supporting the delivery of much needed affordable homes.

153. APPROVAL OF HOUSING CONSTRUCTION CONTRACT AND LAND APPROPRIATION AT REMINGTON ROAD

The Cabinet Member for House Building, Place-Making, and Development considered the report which sought approval, in light of engagement with local residents, to deliver forty-six new Council homes for Council rent on Council land consisting of twelve one-bedroom, sixteen two-bedroom, fourteen three-bedroom and four four-bedroom with five of these homes being fully accessible for wheelchair-users.

In order to facilitate this, Cabinet is being asked to approve use of the Council's powers to appropriate the land for planning purposes and to override any easements.

Cabinet is asked in light of a formal procurement exercise to approve the appointment of Formation Design & Build Ltd (exempt - further details in exempt report), to deliver these new Council homes on vacant land.

The Cabinet Member for House Building, Place-Making, and Development noted that the Cabinet Member portfolio had been updated from the Cabinet Member for Housing and Estate Renewal to the Cabinet Member for House Building, Place-Making, and Development.

The Cabinet Member RESOLVED

1. To approve the appointment of Formation Design & Build Ltd to undertake building works to provide a total of forty-six Council rented homes at Remington Road for a total contract sum as set out in the exempt appendix; and to approve the client contingency sum set out in the exempt part of the report.

2. To approve the appropriation of the land at Remington Road highlighted in the red line boundary plan attached at Appendix 1 from housing purposes to planning purposes under Section 122 of the Local Government Act 1972 as it is no longer required for the purpose which it is currently held, and for the purpose of carrying out development as set out in paragraphs 6.1 to 6.7 of the report.

3. To approve the use of the Council's powers under Section 203 of the Housing and Planning Act 2016 to override easements and other rights of neighbouring properties infringed upon by the Remington Road development, under planning permission Ref: HGY/2021/2882.

4. To delegate to the Director of Housing, Regeneration and Planning, after consultation with the Director of Finance and the Cabinet Member for ~~Housing and Estate Renewal~~ **House Building, Place-Making, and Development**, authority to make payments of compensation as a result of any infringement arising from the development and payable as a result of recommendation 3, within the existing scheme of delegation.

5. To approve the appropriation of the land at Remington Road (edged red in the boundary plan attached at Appendix 1) from planning purposes back to housing purposes under Section 19 of the Housing Act 1985, after practical completion of the development.

Reasons for decision

On July 2019 Cabinet included the land at Remington Road into the Council's housing delivery programme. This scheme has subsequently been granted planning consent and is ready to progress to construction. This report therefore marks the third, and final, Member led decision to develop on this site.

Following a formal procurement process, a contractor has been identified to undertake these works.

Alternative options considered

It would be possible not to appoint a contractor to develop this site for the Council. However, this option was rejected as it does not support the Council's commitment to deliver a new generation of Council homes.

This opportunity was procured via a competitive tender through the Westworks Development and Construction Dynamic Purchasing System, using JCT Design & Build 2016 with amendments. An alternative option would have been to do a direct appointment, but this option was rejected due to the estimated contract value of the scheme.

The Council could continue with the scheme without appropriating the site for planning purposes, but this would risk the proposed development being delayed or stopped by potential third-party claims. By utilising the powers under Section 203 of the Housing and Planning Act 2016 (HPA 2016), those who benefit from third party rights will not be able to seek an injunction since those rights or easements that are overridden are converted into a claim for compensation only.

The Council recognises the potential rights of third parties and will pay compensation where a legal basis for such payments is established. The housing delivery team actively engaged with local residents about the development of this site as they proceeded through the feasibility and design stages and any comments or objections raised were taken into consideration by Planning Committee in reaching its decision.

154. APPOINTMENT OF CONTRACTOR FOR WORKS TO IRISH CENTRE FOR RELOCATION OF THE GRACE ORGANISATION

The Cabinet Member for House Building, Place-Making, and Development considered the report which noted that the Whitehall Street premises occupied by the GRACE were in the first phase of the High Road West Scheme, recently confirmed as proceeding following a 'yes' vote in the ballot of Love Lane Estate residents. The High Road West Scheme would require the demolition of Grace Centre premises at Whitehall Street as this was the location for the first new council houses. The GRACE Organisation's relocation was therefore important for the delivery of the scheme and in light of the importance of the service to the community in north Tottenham, the Council had prioritised finding suitable new premises to enable this service for Haringey residents to continue. The Council had committed to finding the GRACE Organisation a space of similar size in which to provide their day provision services. The Council was working with the Grace Organisation to shape the design and agree the works required to refurbish the Irish Centre to enable their relocation. The relocation was required to provide vacant possession of the first part of the High Road West site, ahead of the deadline for Start on Site of Plot A of the High Road West scheme as required under the terms of the GLA funding.

It was noted that the report sought approval for a budget of up to **[This information is contained in the exempt report]** to deliver these works, and to approve a delegated authority to the Director for Housing, Regeneration and Planning to appoint a Contractor on completion of the tender. The report described the nature of those works and the basis for this decision.

The Cabinet Member RESOLVED

1. To approve the sum of up to **[This information is contained in the exempt report]** for the appointment of a Contractor for delivery of the Grace Relocation Works as outlined in paragraphs 6.7 to 6.8 of the report.

2. To give delegated authority to the Director of Housing, Regeneration and Planning to agree the final sum for the works within the upper limit referred to in 'i' above, and to appoint, and enter into contract with a Contractor based on the outcome of the tender process.

3. To agree for the costs for the works to be paid from the Land Assembly Budget and subsequently claimed from Lendlease on transfer of the lease for Phase 1 of the scheme, as part of the reimbursement costs for property in the High Road West scheme as related to the CPO Indemnity Agreement as described at paragraph 6.9 of the report.

Reasons for decision

The Grace Organisation delivers a valuable day service to the local older community including clients referred by Adults and Health, which will need to be maintained following their relocation from their current site, which is in the first phase of the High Road West scheme. The proposed refurbishment of the Irish Centre to accommodate the Grace Organisation provides the opportunity for a good quality new facility to be provided for the Grace Organisation that is compliant with recognised day provision and dementia standards as part of the wider range of community organisations based at the Irish Centre.

The High Road West scheme is required to meet challenging timescales related to the funding and delivery deadlines. The Council needs to procure a contractor to deliver the works to the required level of quality and specification, in line with the timescales. The period available to the Council in which to procure and deliver the works to meet GLA funding deadlines, requires that a contractor is procured by mid March and in contract by April. Approval of the recommendation(s) through this Cabinet Member Signing will allow the Council to meet this timescale.

Alternative options considered

<u>Not to approve the sum to undertake the works to the Irish Centre</u>

Not to approve the sum recommended in this report would result in the Council being unable to procure and deliver the refurbishment works at the Irish Centre that would allow the relocation of the Grace Organisation. This in turn, would result in Grace not being able to move away from the site area to a facility with which to deliver their service and the Council being unable to meet its obligations in delivering a vacant site for the first phase of High Road West. This would result in substantial risks (e.g. financial, political, reputational, legal) due to the failure of the High Road West scheme to progress in line with commitments made by the Council.

155. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

That the press and public be excluded from the remainder of the meeting as items 7-9 contained exempt information, as defined in Section 100a of the Local Government Act 1972 (as amended by Section 12A of the Local Government Act 1985); paras 3 and 5, namely information relating to the financial or business affairs of any particular person (including the authority holding that information) and information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

156. EXEMPT - LETTING OF BUILD CONTRACT FOR TOPHAM AND RISLEY

The Cabinet Member considered the exempt information.

157. EXEMPT - APPROVAL OF HOUSING CONSTRUCTION CONTRACT AND LAND APPROPRIATION AT REMINGTON ROAD

The Cabinet Member considered the exempt information.

158. EXEMPT - APPOINTMENT OF CONTRACTOR FOR WORKS TO IRISH CENTRE FOR RELOCATION OF THE GRACE ORGANISATION

The Cabinet Member considered the exempt information.

CABINET MEMBER: Cllr Ruth Gordon

Signed by Cabinet Member ……

Date …8 March 2022……..

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MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON THURSDAY, 10TH MARCH, 2022, 10.00 - 10.35 AM

PRESENT: Councillor Zena Brabazon, Cabinet Member for Early Years, Children, and Families.

In attendance: Keith Mattacks, Project Manager; David Moore, Head of Construction Related Project Delivery; Sylvester Olutayo, Senior Project Manager; Shwetal Patel, Project Manager; Adrian Watson, Major Projects Delivery Manager; Charlotte Pomery, Assistant Director for Commissioning, and Fiona Rae, Acting Committees Manager.

159. APOLOGIES FOR ABSENCE

There were no apologies for absence.

160. DECLARATIONS OF INTEREST

There were no declarations of interest.

161. ALEXANDRA PRIMARY SCHOOL URGENT CONDITION WORKS - CONSTRUCTION WORKS CONTRACT AWARD

The Cabinet Member for Early Years, Children, and Families considered the report which sought approval for an award of contract to provide Urgent Condition Work at Alexandra Primary School, pursuant to Contract Standing Order (CSO) 16.02. The report also sought, pursuant to CSO 16.02, to approve the issuance of a letter of intent.

The Cabinet Member highlighted the importance of ensuring that there were firm project management arrangements for works undertaken by contractors and suggested that it would be beneficial to meet with school Headteachers in order to share information on projects. The Head of Construction Related Project Delivery noted that communications were taking place with the school and had resulted in some positive project developments, such as undertaking works out of hours to avoid pressure during essential spaces during school hours. It was stated that there was also a delivery plan to assist with project management. It was added that there had been a number of recent works at schools and that there would be reviews with Headteachers in order to document learning points for future contracts.

The Cabinet Member RESOLVED

1. Pursuant to Contract Standing Order 16.02, to approve the award of contract to Contractor A (identified in the exempt part of the report).

2. To approve a client construction contingency as outlined in the exempt part of this report strictly managed under change control governance arrangements. Regular updates on any expenditure of the contingency can be provided to the Cabinet Member on request.

3. To approve the issuance of a letter of intent for up to 10% of the contract value (identified in the exempt part of this report).

Reasons for decision

A major review of the condition and suitability of the Children's Services estate has been undertaken which has informed the Children's Service's asset management plan (CSAMP). This identified condition and suitability deficiencies in the primary, secondary, and wider Children's Service estate that need addressing in the short, medium, and long-term. Alexandra Primary School is high priority for major works due to issues relating to health and safety and school closure risks.

These works at Alexandra Primary School form part of the programme of repair and improvement works being undertaken by Children's Services to the school estate following an estate wide review of school condition and compliance. A number of programme delivery options were presented for consideration and approval was subsequently granted to proceed with the design of a number of the most urgent projects. This project forms one of those given approval for urgent commissioning.

While the scheme at Alexandra Primary School relates to the resolution of a number of condition and health and safety issues as part of these works there will be improvements in the school buildings in terms of energy consumption. Specific works generating are:

- Replacement of existing sash windows with double glazed units
- Improvements to ceiling/roof insulation
- Replacement of heating pipework – the new pipework will have improved insulation which will reduce the energy required to heat to temperature required
- Replacement of flat roof coverings

It is anticipated that these measures will result in a reduction in energy consumption equivalent to a cost saving of £5,870 per year.

The works at Alexandra Primary School are being delivered as a single phase. This construction award report requests a decision on the procurement of a contractor to undertake the following works:

- Replacement of the heating distribution pipework
- Replacement of hot and cold water distribution pipework
- Upgrading of fire compartmentation within the school buildings
- Repairs to window frames
- Replacement of existing single glazed sash windows with new double glazed sash windows.
- Major repairs to the roof

- Repairs to gutters and downpipes.

A Cabinet Member signing has been requested in March 2022 to enable the mobilisation of the contractor after Easter to enable scaffolding of the whole building to commence in May half term 2022 and the main works from the school summer holiday period. This is essential due to the need to maximise the school summer holiday period as the school site is constrained with no available decant spaces available once the school return in September, limiting all works to out of hours after the summer holiday. A later signing would severely impact on the school and would be disruptive to teaching and learning.

Alternative options considered

Do nothing – a decision not to support this award of construction contract will result in the Councils failure to suitably maintain its education estate by undertaking essential condition improvements. This would increase the likelihood of reactive works which will create greater disruption and cost to the Council and potentially result in the loss of education days. All of which would undoubtedly impact on the quality of teaching and learning.

Delaying a decision further would add additional time to the programme. Not being able to award a contract and place orders in time to complete all scaffolding and other enabling works before the school summer holiday 2022 would result in greater cost due to additional out of hours working and a prolongation of the programme. Minimising disruption to learning and the safety and wellbeing of both pupils and staff is of paramount importance. Although these are intrusive works, the area of the development will be clearly segregated from the staff and pupils.

Due to limitation on teaching space, temporary decant accommodation on site was explored but discounted due to site constraints and cost.

162. PARK VIEW SCHOOL - REPLACEMENT OF SPORTS HALL ROOF AND WALL CLADDING WITH ASSOCIATED WORKS – VARIATION OF CONSTRUCTION CONTRACT

The Cabinet Member for Early Years, Children, and Families considered the report which noted that, on 13th April 2021, the Cabinet Member for Early Years, Children, and Families approved an award to Cosmur Construction for the Construction Contract for Park View School up to £869,431.24. This was broken down into an initial award of £790,392.04 and contingency allowance of £79,039.20.

This award was amended under officer delegation to correct the company name to Cosmur Construction (London) Ltd and subsequently reported to Cabinet on 8th February 2022.

The report sought Cabinet Member approval to vary the contract with Cosmur Construction (London) Ltd for Park View School as allowed under Contract Standing Order (CSO) 16.02 and 10.2.1.b.

The Cabinet Member RESOLVED

1. Pursuant to Contract Standing Order 16.02, to approve a variation of the construction contract to Cosmur Construction (London) Ltd in the sum of £39,271.59 giving a varied contract value of £908,702.83.

2. To approve a contingency allowance of 5% at £45,435.14 offering a total award value up to £954,137.97. The contingency will be managed under strict change control governance.

Reasons for decision

During construction, additional condition works have been identified that include the replacement of the hall flooring, lighting and redecoration. This was discovered once the works commenced and the contractor was able to fully access and intrusively inspect the hall flooring and lighting. Scaffolding and working crash deck in place for new mechanical works provided greater access to inspect lighting.

The opportunity to complete these additional works as part of the current construction contract provides best value for the council and minimises disruption for the school.

The Children's Capital Programme Budget is sufficient to cover this contract increase.

Alternative options considered

Do nothing – a decision not to support the increase in the value of the construction works contract would leave the school with inadequate facilities to meet curriculum requirements which the community also benefit from.

163. ALEXANDRA PARK LIBRARY - ENHANCEMENT WORKS - AWARD OF CONSTRUCTION CONTRACT

The Cabinet Member for Early Years, Children, and Families considered the report which sought approval for an award of contract to carry out enhancement, compliance and condition works at Alexandra Park Library, pursuant to contract standing order 16.02. The report also sought, pursuant to Contract Standing Order (CSO) 16.02, to approve the issuance of a letter of intent.

The Cabinet Member noted the importance of ensuring that the library was designed and developed appropriately to encourage people to come to the library and to use it. The Major Projects Delivery Manager acknowledged this comment and noted that the works were designed to revitalise the library, which included a new stock of books.

The Cabinet Member RESOLVED

1. Pursuant to Contract Standing Order 16.02, to approve an award to Contractor A (identified in the exempt part of the report) of up to £644,655.00.

2. To approve a client construction contingency of 10% that equates to £64,466.00, which will be strictly managed under change control governance arrangements.

3. To approve other sundry costs such as: PM fees, design fees, QS fees, statutory costs, contingencies, and sundry other costs amounting to £334,928.

4. To approve the issuance of a letter of intent for up to 10% of the contract value totalling £64,466.00.

Reasons for decision

In 2019, the Council allocated capital funds for major improvements to the Council owned libraries. The Council has committed funds from the Capital Programme for the Library IT and Building Upgrade works, and following completion of Stroud Green and Harringay, and Coombes Croft Libraries, currently the available budget is £1.91m. The aim of this programme is to improve the environment for customers and staff. Coombes Croft Library was completed in 2020 and Stroud Green and Harringay Library in November 2021. Alexandra Park Library is the next library in the Enhancement Programme sequence and will be followed by Highgate Library, Muswell Hill Library and Wood Green Library. Marcus Garvey and Hornsey Libraries were the subject of a separate refurbishment programme budgets and have been completed.

The objectives of the Library IT and Buildings Upgrade Programme are as follows:

- Revitalising internal space by reorganizing how the space is utilised and to upgrade finishes.
- Redecoration in the main library areas.
- Interior redesign of the library space to modernize and better facilitate library floor walking and self- service technology.
- Enhanced lighting.
- New furniture.
- New stock and books.
- New wayfinding signage.
- IT upgrades including new hardware, RFID self-service kiosks, and improved Wi-Fi.

In early 2020, it was discovered that in addition to the aesthetic enhancements to be undertaken in the Library IT and Building Upgrade Programme, significant compliance and condition works were also required to all of the branch libraries. Following a gap analysis and review, the scope of the compliance and condition works at Alexandra Park Library has been agreed with Corporate Landlord, and to avoid unnecessary disruption to library customers and staff, the agreed scope of those works is now incorporated into the IT and Buildings Upgrade scheme. The works include external redecoration, paving repairs and improved accessibility ramp, roof repairs and insulation, new fire alarm, electrical rewire, and a new heating system. Corporate Landlord will be contributing the funding value of the compliance and condition works which has been agreed as £341,000 plus fees of £61,380, their total contribution being £402,380.

A Cabinet decision is requested in March 2022 to enable the mobilisation of the contractor, meaning works can commence in late March 2022 with completion of the works in August 2022. The Libraries IT and Building Upgrade programme is sequential so as not to impact Library Services, therefore, delay to commencement of Alexandra Park Library will have a knock-on effect to the libraries that follow on in the programme sequence.

Alternative options considered

Do nothing – a decision not to support this award of construction contract will result in the Councils failure to suitably maintain the Alexandra Park Library by undertaking essential condition and compliance works, and further delay may mean the building fabric deteriorates in the ensuing years causing further disruption and expense. This would also increase the likelihood of reactive works at further cost to the Council. In addition, the experience of staff and customers will continue to be impaired as the aesthetic and ICT improvements will not have been carried out.

Delaying a decision further would add additional time to the programme. Not being able to award a contract and place orders at the earliest opportunity in March 2022 would mean that the ensuing libraries in the programme (Highgate, Muswell Hill and Wood Green) would also be delayed, as these are to be started and completed sequentially to minimise disruption to Library Services and customers.

164. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

That the press and public be excluded from the remainder of the meeting as items 7-8 contained exempt information, as defined in Section 100a of the Local Government Act 1972 (as amended by Section 12A of the Local Government Act 1985); paras 3 and 5, namely information relating to the financial or business affairs of any particular person (including the authority holding that information) and information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

165. EXEMPT - ALEXANDRA PRIMARY SCHOOL URGENT CONDITION WORKS - CONSTRUCTION WORKS CONTRACT AWARD

The Cabinet Member considered the exempt information.

166. EXEMPT - ALEXANDRA PARK LIBRARY - ENHANCEMENT WORKS - AWARD OF CONSTRUCTION CONTRACT

The Cabinet Member considered the exempt information.

CABINET MEMBER: Cllr Zena Brabazon

Signed by Cabinet Member ……..

Date …17 March 2022……

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MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON THURSDAY, 10TH MARCH, 2022, 2.00 - 2.20 PM

PRESENT: Councillor Lucia das Neves, Cabinet Member for Health, Social Care, and Well-Being.

In attendance: Anita Marsden, Head of Integrated Care; Rebecca Cribb, Commissioning Officer; Jeni Plummer, Assistant Director for Adults; Charlotte Pomery, Assistant Director for Commissioning; and Fiona Rae, Acting Committees Manager.

167. APOLOGIES FOR ABSENCE

There were no apologies for absence.

168. DECLARATIONS OF INTEREST

There were no declarations of interest.

169. INCREASE THE VALUE OF THE COMMUNITY EQUIPMENT CONTRACT WITH MEDEQUIP ASSISTIVE TECHNOLOGY LTD

The Cabinet Member for Health, Social Care, and Well-Being considered the report which noted that Community Equipment supported vulnerable people to remain independent for longer improving their outcomes and reducing the need for more formal and costly care.

It was noted that, to enable the best value for money in purchasing communinty equipment, mainly due to economies of scale, Haringey joined the London Consortium for the provision of Community Equipment. Haringey jointly tendered and awarded the contract to Medequip Assistive Technology Ltd ('Medequip') through a framework contract ("the Framework"). At present the Consortium consisted of 21 London Boroughs out of 33. The only borough delivering in house equipment store was Enfield.

The 4-year Framework with Medequip was agreed at Cabinet in February 2017 (taking the contract to 2021) with the option to extend for 1+1 years (to March 2023). Both extension periods had been agreed by the consortium.

Since then, additional services had benefitted from access to this contract, increasing the volume of equipment being supplied and therefore the associated value of the contract. The additional services include Special Educational Needs & Disabilities (SEND), the Paediatric Therapy Team at Whittington Health and the Community Alarm Team (CAS) which all procured their community equipment stock through this contract. In addition, there had been increased demand for community equipment from the contract during the pandemic.

This increased activity would result in there being insufficient budget reflected in the contract for the financial year 2022-23 and there was a need to increase the total contract value by £1.1 million, from £10.8 million to £11.9 million.

The Cabinet Member RESOLVED

To approve the increase in the value of the Framework with Medequip by £1.1 million for the remainder of the contract term to March 31 2023, in accordance with Contract Standing Order 10.02.1(b).

Reasons for decision

Cabinet originally approved the award of the Framework in March 2017 for the initial period of 4 years with an option to extend for 2 years at a total value of some £7.2 million. In February 2020 Cabinet approved a contract extension to March 2023, and variation to increase the contract value to £10.8 million.

Since the contract extension in February 2020, the Covid pandemic has affected all areas of life, leading to unprecedented demand for use of the community equipment service which has continued to meet the challenge. The increased demand and other factors set out below resulted in 20% higher spending through the contract by the 5 services in 2020-21, up from £1.77 million to just under £2.2 million As an example, average monthly spending through the contract increased to £177,000 in 2020/21 and has increased again to £193,000 in the first 6 months of 2021-22.

The other factors leading to increased costs include:

An increase in community equipment prices. From April 1st 2021, 520 Medequip stock items had a price increase whilst 420 remained the same. The net effect was a 2.7% price increase. The price rises were driven by large increases in raw material costs due to shortages in foam and steel.

Increased costs due to contributions to the Personal Protective Equipment (PPE) costs of Medequip technicians during the pandemic by all consortium members. This was charged at 0.82p per activity (a visit to a residents home).

The implementation of a block payment scheme, agreed across London Association of Directors of Adult Social Services in late March 2020, to assist Medequip with a potential shortfall during the pandemic in three areas, activity fees, labour repair costs, recycling fees.

1.7% increase in activity fees by Medequip from April 2021.

Increased freight/ shipping container cost charges that are forecast to continue until early 2022, some of which will potentially be passed onto boroughs, with amounts still to be determined. Average price per container increased from £2000 per container to £18,000.

Procurement costs for the new consortium tender, projected to be circa £35k per borough.

Of the £2.2 million spent in 2020-21, £855,000 (40%) was attributable to Adult Social Care spend and the remainder was recharged as follows:

- Haringey Clinical Commissioning Group (CCG): £1,117,000 (53%)
- Community Alarm Services: £37,000 (1.75%)
- Special Educational Needs & Disabilities: £76,000 (3.6%)
- Whittington Paediatric Therapies: £38,000 (1.8%)

The CCG figure of £1,117,000 represents an increase in spending of 22% from the previous financial year. Covid caused an unprecedented demand for beds and high risk pressure mattresses, which along with other equipment helped to facilitate fast hospital discharges.

Given the above figures it is expected that of the £1.1m contract variation request, £660,000 (60%) would be recharged to other services.

Alternative options considered

The London Consortium will be going out to tender for a new contract to start in April 2023. The process for re-tendering commenced in April 2021 and has involved extensive engagement and workshops with local boroughs and driven by the Consortium Management Board. Locally we have been involved from a Procurement and operational perspective. Given we are approaching the final year of a 6-year contract other options are limited at this stage.

170. CONTRACT FOR NURSING INTERMEDIATE CARE BEDS

The Cabinet Member for Health, Social Care, and Well-Being considered the report which sought seek authorisation for a direct contract award under Contract Standing Order 16.02 in line with CSO 9.01.2 (g), negotiation without publication of an advertisement, to Magicare Ltd T/A Priscilla Wakefield House for the provision of 8 Intermediate Care Nursing beds.

The report also detailed the Council's requirement for Nursing Intermediate Care provision and demonstrated that these specialist nursing beds were an essential element of Haringey's intermediate care pathway, which is made up of a range of integrated care services that aim to support residents at risk of an unnecessary hospital admission and to support patients to increase their independence following hospital admission.

The Cabinet Member enquired whether alternative providers had been considered. The Commissioning Officer noted that this had been considered but highlighted that Priscilla Wakefield House, run by Magicare Ltd, was currently the only Care Quality Commission (CQC) registered nursing care home in the borough and that in-borough delivery of the service was key for the patients and their families. It was added that the beds were supported by a dedicated Multi-Disciplinary Team (MDT) which also operated from Priscilla Wakefield House. It was noted that, if there were to be a

tender, this would be open to bids from out of borough and it was considered that, given the key role of the MDT, this would impact on the viability of the bids.

In relation to queries about staffing pay and conditions, the Commissioning Officer noted that Priscilla Wakefield House currently offered the National Living Wage and officers were working with the provider to move towards the London Living Wage. It was noted that it was aimed to phase this process in order to ensure that it was sustainable. It was added that there was currently an increased degree of uncertainty, including fuel costs, and so the phased approach was considered the most appropriate and deliverable option.

The Cabinet Member RESOLVED

1. Pursuant to CSOs 9.07.1(d and e) and 16.02, to approve the award of contract to Magicare Ltd for the provision of eight (8) Nursing Intermediate Care Service beds for a period of three (3) years, from 1 April 2022 to 31 March 2025 with the option to extend for up to two (2) years, up to a maximum contract value of £2,288,000.

2. To give delegated authority to the Director of Adults and Health to agree the final sum for the service within the upper limit referred to above.

Reasons for decision

Evidence from the 2015 National Audit of Intermediate Care shows that intermediate care services are key to reducing the financial, quality and activity pressures being experienced in secondary care and the social care sector.

There is a very limited market for nursing beds in the local area. Priscilla Wakefield House (PWH), run by Magicare Ltd, is currently the only Care Quality Commission (CQC) registered nursing care home in the borough with a bed base of 117 Nursing beds.

The award of this contract will enhance Haringey's intermediate care pathway by continuing to work with a local provider to deliver a co-ordinated intermediate care nursing bed service in Haringey allowing Haringey residents to remain close to home whilst recovering.

The Joint intermediate care pathway was established in 2016 and is a partnership approach between health and social care to managing hospital discharges for patients requiring short term health and care interventions. The proposed Nursing Intermediate Care Beds will be funded through the Clinical Commissioning Group (CCG) Minimum Allocation for the Better Care Fund (BCF) which will be recharged to the Local Authority by the Clinical Commissioning Group and shall not have a financial implication to the Local Authority.

The Nursing Intermediate Care Beds will provide an alternative nursing care offer for those with ongoing health needs following a hospital discharge. These beds will support patients with high intensity and/or more specialised nursing needs who may require a spell of 'active nursing convalescence' as part of the joint intermediate care pathway to prevent patients needing to go to, or to facilitate their return home from

hospital. This time-limited response forms part of the wider intermediate care and community nursing solutions available for Haringey patients.

Traditionally these patients would have been provided care by health partners through spot purchased health step down. It is recognised that patients placed in these provisions frequently deconditioned due to a lack of timely therapeutic input and following period of convalescence had higher than anticipated needs requiring Long Term Care placements funded predominantly by adult social care. It is believed that incorporating these beds into the joint Health and Social Care intermediate care pathway will streamline connections between Intermediate Care Services and Continuing Health Care (CHC) assessments through closer collaboration between the Single Point of Access (SPA), CHC team and Reablement services and will better accommodate and manage this patient group improving patient outcomes and the effectiveness of care.

It is anticipated that the provision of these beds will improve outcomes for patients as a result of the convalesced individuals receiving co-ordinated care from the Nursing Home, Care Homes Assessment Team (CHAT)[1] and Multi-Disciplinary Team (MDT)[2] who are already providing intermediate care services within Priscilla Wakefield House. This will enable patients to 'step down' to less intensive solutions following their intervention which will be beneficial to health and social care Long Term Care budgets and will reduce the risk of subsequent hospital readmissions.

Purchase of these eight beds will support Haringey's intermediate care pathway by mitigating the significant risk that beds will otherwise not be available when needed. This will result in delayed transfers of care for Haringey patients and increased risk that patients will be placed in out of borough spot purchase arrangements with no access to multi-disciplinary input to support the patients recovery which potentially lead to irreversible deconditioning increasing probability of requirement for long term nursing placement. The CCG has recently reinforced its commitment to these Integrated Care Beds by agreeing to increase its funding of the contract from six beds to eight beds.

Should need or demand for these beds change during the course of this contract, the Council will retain the right to use the beds flexibly, including for general nursing, but with the prior notification to the provider.

The Nursing Intermediate care beds are part of Haringey's wider intermediate care provision. As noted, the beds are supported by a dedicated community health multidisciplinary team (MDT). The MDT is critical for ensuring efficient bed flow and therapy input to achieve better outcomes for individuals and reduce long term care costs.

Haringey's MDT Service is comprised of a part time GP, Social Worker, Physiotherapist, Occupational Therapist, Rehab Technician and Pharmacist all working holistically with the service user to maximise their independence. The MDT service is funded through the Boroughs Better Care Fund and covers other intermediate care services within the borough, providing continuity of care for patients transferring between establishments. The Team are also able to access additional support from other community health providers such as District Nursing and Rapid

Response within borough. However, it should be noted that the funding and contracting of the MDT is under a separate element of the Section 75 Agreement between the Council and the CCG, and are not included in the contract under discussion in this paper. If as an alternative, we utilised a nursing home outside of the borough for these intermediate care beds, this would result in no MDT input. In-borough delivery of this service and MDT is in the patients' and families, and Council's overall interest.

Alternative options considered

Do nothing – this would result in Haringey CCG being solely reliant on spot purchasing for the provision of these beds. Due to the limited availability of nursing bed provision within the borough this would likely lead to out of borough provision, delays to discharge and the loss of the benefits of rehabilitative input from the MDT and CHAT.

Go out to tender – The Council and CCG could have undertaken a competitive tender process in line with Contract Standing Orders. However, as Priscilla Wakefield House is the only nursing home in the borough it would have been necessary to obtain bids from nursing homes outside the borough. Due to the multi-disciplinary support already in place at PWH out of borough provision would result in the loss of the benefits of rehabilitative input from the MDT and CHAT and diminish the effectiveness and value of the service.

Across the North Central London footprint there is limited provision of nursing care. Currently there are approximately 2500 nursing home beds within the five partner boroughs. It is Haringey's policy to place residents only in homes which are rated 'Good' and 'Outstanding' by CQC and 28% of beds within the North Central London footprint are in establishments rated 'requires improvement' which further limits the number of available supply.

171. VARIATION AND EXTENSION OF HOUSING RELATED SUPPORT CONTRACT - REACH & CONNECT SERVICE

The Cabinet Member for Health, Social Care, and Well-Being considered the report which sought Cabinet approval to implement Contract Standing Order 10.02.1b, to vary and extend the contract for the Community Navigator Service for Older people in Haringey (Reach & Connect) with Public Voice for a period of 2 years.

The Cabinet Member noted the importance of ensuring that various services, such as the Reach & Connect and Information & Advice Service, were connected and were providing the best possible results for residents. She added that this included the information that was provided to residents, both directly and on the Council's website. The Assistant Director for Commissioning acknowledged the points made and noted that links between services and capacity building opportunities were being considered. It was explained that there was a request to extend the Reach & Connect Service whilst a more comprehensive review on community navigators was being undertaken.

The Cabinet Member RESOLVED

1. To approve the variation and extension of contract for the Community Navigator Service for Older People in Haringey (Reach & Connect), held by Public Voice, as allowed under Contract Standing Order 10.02.1b as follows:

- Year 4 (1 May 2022 to 30 April 2023) – £391,670
- Year 5 (1 May 2023 to 30 April 2024) - £401,670
- Which is a total extension value of £793,340

2. The aggregated value of the contract period from 1 May 2019 to 30 April 2024 is £2,041,440.

3. Funding for this extension will be from the Council's Housing Related Support general fund budget, in Adults and Health.

4. The contract was re-negotiated with Public Voice for the duration of the variation and extension period as shown in 6.13 of the report.

Reasons for decision

The service enables older people in the borough to continue living independently in their own homes and prevent escalation in care needs and hospital admissions.

Performance has been evaluated as good throughout the contract period. Performance returns are completed and submitted on time and targets are met. There is a demonstrable need for this service in Haringey and the services are evidently delivering positive outcomes for older residents. Therefore, it is in residents and the Council's overall interest to continue to provide these much-needed older people services in Haringey.

Alternative options considered

Do nothing: It would be possible to leave the contract to cease at the end of this contract period, however there is continued high demand for this service, and it continues to achieve positive outcomes for vulnerable people. Therefore, it would not be in the council's interest to end this contract at this time.

In-house provision was considered and was found not to be suitable for delivery of this service, as there is not currently the expertise within the Council to provide this service.

Consideration was given to the completion of a procurement exercise via an open tender process. However, this option was discounted because the Council was able to enter into negotiations with the current provider and use the option to extend the contract which was agreed by Cabinet in March 2019.

CABINET MEMBER: Cllr Lucia das Neves

Signed by Cabinet Member ……

Date …17 March 2022…….

MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON FRIDAY, 18TH MARCH, 2022, 10.00 - 10.30 AM

PRESENT: Councillor Lucia das Neves, Cabinet Member for Health, Social Care, and Well-Being.

In attendance: Sarah Hart, Senior Commissioner, and Fiona Rae, Acting Committees Manager.

172. APOLOGIES FOR ABSENCE

There were no apologies for absence.

173. DECLARATIONS OF INTEREST

There were no declarations of interest.

174. APPROVAL OF ACCEPTANCE OF GRANT FUNDING FOR 2022/23 FOR THE SUPPLEMENTAL FUNDING FOR SUBSTANCE MISUSE TREATMENT AND RECOVERY

The Cabinet Member for Health, Social Care, and Well-Being considered the report which noted that the Council had been given early warning of an indicative grant from the Office of Health Improvement and Disparities (OHID). The grant was to support improvements in the quality and capacity of substance misuse treatment and recovery for Haringey residents. The report sought rapid approval to accept this grant, thus allowing existing contracts to be extended and planning to commence.

The Cabinet Member noted that the importance of ensuring that there was a Drug Strategy with a system-wide approach, including public health, children's services, and the police, to ensure the best outcomes for service users and residents.

It was added that the Cabinet Member for Stronger and Safer Communities had been informed about the indicative grant. It was requested that there was an opportunity for the Cabinet Member for Health, Social Care, and Well-Being and the Cabinet Member for Stronger and Safer Communities to meet formally to discuss options for a holistic Drug Strategy.

The Cabinet Member RESOLVED

1. In accordance with Contract Standing Orders (CSO) 16.02 and 17.1, to approve the receipt of the Office of Health Improvement and Disparities (OHID) grant to supplement funding for substance misuse treatment and recovery for the year 2022/23.

2. The Grant is expected to be in the region of £850,000 for 2022/23.

Reasons for decision

Reducing the impact of drugs and alcohol misuse on adults, families and the community is a cross cutting Council priority. The Council therefore welcomes a significant uplift in funding over the next three years. We have received very late notification of the funding for the financial year 2022/23, which is still only indicative. However, some of this grant is already committed to contracts due to finish in March 2022. We wish to accept the indicative budget for 2022/23 to be able to extend our current contracts and to start planning. The plan is then to return to Cabinet to accept the confirmed budgets for subsequent years with a comprehensive plan for spend.

Alternative options considered

The Cabinet Member could refuse to receive the grant. However, as there is a clear need for this work and strong support to continue to tackle the impact of substance misuse on the community, this option has not been considered.

The Chair of Overview and Scrutiny has been informed that it was impracticable to give 28 days' notice of the decision. Notice of the indicative allocation was given on 15 February 2022. This is a new grant, which follows on from the Universal Grant received in 2020/22. The new grant needs to be accepted so that the Council can extend the Universal contracts from April 2022. The pre-election period will be in place from 21 March 2022; therefore, normal Cabinet functions will be suspended/limited during this period.

Given the above, it is not practicable to comply with the 28-day notice requirement in Part Four, Section D, Rule 13 of the constitution. This is set out in Part Four, Section D, Rule 16, of the Constitution.

175. CONTRACT EXTENSION WITH CENTRAL NORTH-WEST LONDON NHS FOUNDATION TRUST (CNWL) FOR CONTRACTS FOR LOTS 1A- GENITO-URINARY MEDICINE (GUM), SEXUAL HEALTH REPRODUCTIVE SERVICES (SRH), AND ROUTINE PRE-EXPOSURE PROPHYLAXIS (PREP) COMMISSIONING

The Cabinet Member for Health, Social Care, and Well-Being considered the report which requested the implementation of Contract Standing (CSO) 16.02 and 10.02.1 (b) to approve an extension of contract to Central and North West London NHS Foundation Trust ("CNWL"), for the delivery of the North Central London (NCL) Genito-Urinary Medicine (GUM), Sexual Health Reproductive Services (SRH), additionally, routine Pre-Exposure Prophylaxis (PrEP) commissioning which was transferred from NHS to local authorities in October 2020 and appended to this contract via cabinet approval in February 2021.

The report also proposed that contracts were extended in accordance with the terms of the contract and approval in the original Cabinet award report for 3 concurrent years from 1st April 2022 – 31st March 2025.

In response to a question about changes to health services across North Central London, it was noted that there had been and were expected to be a number of changes as a result of the Covid-19 pandemic and the introduction of Integrated Care Systems (ICS). It was noted that there were a number of ways to access services, including online, through pharmacies, and through clinics. It was explained that, although a number of people would prefer online services, it was important to ensure that GUM clinics were available as they were often the most appropriate setting for complex or harder to treat cases and for cases with potential safeguarding considerations. It was highlighted that it would be important to ensure that services continued to be available and delivered in North Central London.

The Cabinet Member enquired whether there were differing outcomes for people who accessed services using different mediums, such as online services. It was explained that, in many cases, the different options allowed people to use the service that best suited them. It was noted that officers were conscious of monitoring any differences in outcomes for service users.

The Cabinet Member RESOLVED

To approve the extension of contracts in respect of the provision delivered by the North Central London (NCL) partnership for Genito-Urinary Medicine (GUM), Sexual Health Reproductive Services (SRH) and routine Pre-Exposure Prophylaxis (PrEP) commissioning in accordance with Contract Standing Order (CSO) 16.02 and 10.02.01 (b), from 1 April 2022 – 31 March 2025 to CNWL as follows:

(i) Lot 1a - GUM services, for a period of 3 years from 1 April 2022- 31 March 2025 at an estimated total cost of £4,824,219 for the 3-year extension period. The maximum total estimated cost of the contract, inclusive of the initial 5-year contract is therefore £12,787,991 over 8 years.

(ii) Lot 1b - SRH services, for a period of 3 years from 1 April 2022 – 31 March 2025 at an estimated total cost of £155,001 for the 3-year extension period. The maximum total estimated cost of the contract, inclusive of the initial 5-year contract is therefore £413,336 over 8 years.

(iii) Routine Pre-Exposure Prophylaxis (PrEP) commissioning – for a period of 3 years from 1 April 2022 – 31 March 2025 at an estimated cost of £627,000 (£209,000 per annum).

The estimated annual grant allocation to LB Haringey for PrEP commissioning is £418,000 (based on 2021-22 allocation). It is anticipated that 50% of the annual budget expenditure (£209k) will be spent through CNWL as the commissioned sexual health provider for NCL. Whilst the remainder will cover the cost of residents who access the service from other providers across London and Home Counties.

The total value of the contracts for the 3-year extension period to 31 March 2025 is therefore £5,606,220.

The total value over the life of the contracts is £13,828,327.

Reasons for decision

The NCL Integrated Sexual Health (NCLISH) services are provided by Central and North-West London NHS Foundation Trust (CNWL).

The Haringey - Genito-Urinary Medicine (GUM) contract – lot 1a, for clinic-based services commenced on 3 July 2017, in partnership with Barnet, Camden & Islington for a period of five (5) years (with an option to extend for a further 3 year on year extensions.

The NCL services have been very successful with over 18,000 Haringey residents accessing the service since launch in 2017. Residents benefit from the local authorities pooling their funds and expertise to have a modern, well-staffed service. Haringey has realised savings, some of which have been reinvested in more local services like the Healthy Living Pharmacy (HLP) programme, pan-London sexual health online services, dedicated young people sexual health testing, treatment and women's contraceptive services and a dedicated community-based outreach sexual health promotion STI and HIV testing service aimed at engaging with and supporting residents from groups and communities most impacted by sexual ill health.

The transfer from NHS to local authorities of routine Pre-Exposure Prophylaxis (PrEP) as a standard treatment commissioned by local authorities in October 2020 has also been welcomed. Local Authorities are best placed to ensure equity of access, and this fits well with Haringey's strategy to reduce late diagnosis of HIV and London's ambition to end new infections in the capital by 2030.

Furthermore, because of health concerns, confinement measures and service closures adopted in the wake of the Covid-19 crisis, which caused severe disruption to the core provision of the service alongside other local and regional services that are inter-connected as part of the wider sexual health services landscape. The extension period will allow NCL-commissioners, rest of London (RoL) commissioners (as part of the London sexual health transformation programme (LSHTP) and trust providers (through representation via the Clinical Advisory Group) sufficient time to:

- Review existing service models, due to operational and service delivery challenges experienced during covid-19 lockdown.
- Review best practices implemented during the pandemic to meet those challenges.
- Understand the long-term impact the pandemic has had on how residents will re-engage with in-clinic sexual health services.
- Use the opportunity to apply some of the learning garnered through the council's recovery renewal exercise, to help the council, to better understand how communities disproportionately impacted by the Covid-19 pandemic are accessing sexual health and wellbeing services.
- Allow NCL commissioners and LSHTP to work with sexual health providers to review and re-model current service provision and tariffs as it is clear that a return

to ‘business as usual’ due to the impact of the pandemic on operational and service sustainability is unlikely long-term. The extension period will also provide commissioners the opportunity to better understand the changing service landscape and allow time to develop a new service model that is able to evolve and support increased complexities presented by service users when accessing services i.e., safeguarding concerns, sexual assault, drugs and alcohol and learning disabilities as an example.

The contracts are monitored on quarterly basis including submission of activity data e.g. 21/22 data showed a total of 12,250 attendances comprising clinic and telephone consultations, of which:

- 9,822 were for STI testing and treatment
- 1,877 was for contraceptive support

Alternative options considered

This is a mandated open access service. Service transformation has already realised significant savings and transferred the previous sexual health services into an integrated system across the NCL sector. This is an activity and tariff-based contract, and therefore charges are ultimately based on levels of activity. Due to the complex nature of the cross-charging arrangements, this service is part of the London Sexual Health Programme (LSHP).

The Memorandum of Understanding (MOU) for the LSHP strategic board sets out that partners agree to a number of areas of working together “collaboratively regarding the Integrated Sexual Health Tariff (ISHT). As part of the LSHP, it is required that services use a standardised contract format agreed by all Boroughs as part of the governance of the transformation. This ensures that all the clinics are governed under a similar set of terms and conditions, as a result, any changes made to the contract need to be made in agreement with colleagues across London, in accordance to the contract clause.

The Chair of Overview and Scrutiny has been informed that it was impracticable to give 28 days’ notice of the decision. A timely decision is required to ensure that a contract is in place by 1 April 2022. The pre-election will be in place from 21 March 2022; therefore, normal Cabinet functions will be suspended/limited during this period.

Given the above, it is not practicable to comply with the 28-day notice requirement in Part Four, Section D, Rule 13 of the constitution. This is set out in Part Four, Section D, Rule 16, of the Constitution.

CABINET MEMBER: Cllr Lucia das Neves

Signed by Cabinet Member ……

Date …22 March 2022…….

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MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON FRIDAY, 18TH MARCH, 2022, 2.40 - 2.45 PM

PRESENT: Councillor Ruth Gordon, Cabinet Member for House Building, Place-Making, and Development.

In attendance: Graham Sheret, Project Manager, and Fiona Rae, Acting Committees Manager.

1. APOLOGIES FOR ABSENCE

There were no apologies for absence.

2. DECLARATIONS OF INTEREST

There were no declarations of interest.

3. STATION ROAD SUPPORTED ACCOMMODATION - AWARD OF CONSTRUCTION CONTRACT

The Cabinet Member for House Building, Place-Making, and Development considered the report which requested approval for an award of a contract for the provision of modular accommodation at 141 – 147 Station Road, and for an issuance of Letter of Intent, pursuant to contract standing order 9.04 (Dynamic Purchasing Systems) and CSO 16.02 (contracts awarded by Cabinet Member). The report also requested approval of the project budget as set out in the exempt section of the report and appropriation of the Station Road site from the General Fund (GF) to the Housing Revenue Account (HRA).

The Cabinet Member RESOLVED

1. Pursuant to Contract Standing Order 16.02, to approve an award of contract to Contractor A as detailed in the exempt section of this report.

2. To approve a client construction contingency as outlined in the exempt section of this report strictly managed under change control governance arrangements at the discretion of the Director Housing, Regeneration and Planning. Regular updates on any expenditure of the contingency can be provided to the Cabinet Member on request.

3. To approve the issuance of a letter of intent for up to 10% of the contract value.

4. To approve the total project cost as set out in the exempt section of this report.

5. To approve the appropriation of the land at Station Road (shown edged red on the boundary plan attached at Appendix 2) from general fund purposes to housing purposes under Section 19 of the Housing Act 1985.

Reasons for decision

Addressing homelessness is a priority for Haringey, as indicated in the 2019-2023 Borough Plan.

Besides building more council rent homes for local residents, the council is also seeking to increase the amount of move-on, supported accommodation within the borough, to help people transition from homelessness into independence. Since March 2020, Haringey have moved more than 350 people on from emergency accommodation and hotels into settled accommodation.

The COVID-19 pandemic has shown that it is possible to significantly minimise (or even eliminate) street homelessness given sufficient political will. The “Everyone In” approach has been a great success in protecting some of our most vulnerable residents. Single-night figures of the number of people rough sleeping in Haringey are at a record low. However, this requires a concerted effort to maintain.

By focusing on the development of move-on accommodation for some of Haringey's most vulnerable and excluded residents we are both addressing their individual needs as well as trying to address the balance of provision across emergency, supported and independent living in the borough. To us, it is critical that individuals can see that longer term stable accommodation is an achievable reality for them and that hotel and hostel living can provide a platform to settled accommodation. As well as this we are committed to improving health, housing and employment outcomes for individual residents through the provision of strengths-based practice and trauma-informed care at the frontline, so that the journey away from rough sleeping is personalised, sustained and leads to equal and fulfilling lives.

The proposed site for temporary high-quality accommodation at Station Road, in the centre of the borough, is an important part of this plan and will help to make a real difference to its residents’ lives, providing the base for the final stage in the residents transition back to independent living and the next stage in the journey sometimes started at the new development at Ermine Road in the east of the borough. It will also lead to improvements to the local environment for all residents through site clearance new green landscaping and improved street frontage.

Planning approval will be required for the project. Preparing and submitting the planning application is one of the contractor’s duties. There will be a break-clause in the contract to allow termination of the contract should planning permission fail to be granted.

This construction award report requests a decision on the procurement of Contractor A to undertake the following works:

- Site clearance including demolition of existing buildings. Landscaping works including boundary treatments, bin and cycle stores and CCTV.

- Manufacture, delivery and installation of 29 modular units (27 one-bedroom flats, one office and one café).
- New replacement café to suit the new site layout
- Provision of new utilities and removal of old
- Making all statutory applications and gaining approvals
- Liaison with Network Rail
- Provision of FFE

Alternative options considered

Two other sites were evaluated for suitability to provide 25+ single person modular homes. These were Stoneleigh Road Car Park B and above Westerfield Road Car Park.

Stoneleigh Road was discounted as it was thought that the surrounding area may not be suitable for people who previously may have had dependency issues.

Building above Westerfield Road Car Park, which is located next to Seven Sisters Overground rail station, was discounted as it transpired that agreements had been established to provide small retail units on the car park and it was thought that the colocation of residential and retail units was unsuitable for both types of property.

As the Station Road site is safeguarded for Crossrail 2 'traditional' construction was not considered to be appropriate as there is the risk that the site would be used by Crossrail 2 resulting in any new development having to be demolished. The use of Modular accommodation is considered to be more appropriate given its ability to be moved to other sites and re-used. This allows the site to be developed, with subsequent improvements to the local environment, ahead of any decision being made with regard to the safeguarding of the site for Crossrail 2.

4. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

That the press and public be excluded from the remainder of the meeting as item 5 contained exempt information, as defined in Section 100a of the Local Government Act 1972 (as amended by Section 12A of the Local Government Act 1985); paras 3 and 5, namely information relating to the financial or business affairs of any particular person (including the authority holding that information) and information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

5. EXEMPT - STATION ROAD SUPPORTED ACCOMMODATION - AWARD OF CONSTRUCTION CONTRACT

The Cabinet Member considered the exempt information.

CABINET MEMBER: Cllr Ruth Gordon

Signed by Cabinet Member ……..

Date …21 March 2022……

MINUTES OF Cabinet Member Signing MEETING HELD ON Friday, 18th March, 2022, 11.00 - 11.55 am

PRESENT: Councillor Isidoros Diakides – Cabinet Member for Finance and Transformation.

In attendance: Andrew Meek, Head of Organisational Resilience; Gloria Ighodaro, Capital Projects Manager; Martin Young, Senior Project Manager; Michael Harrington, Senior Procurement Officer; and Fiona Rae, Acting Committees Manager.

1. APOLOGIES FOR ABSENCE

There were no apologies for absence.

2. DECLARATIONS OF INTEREST

There were no declarations of interest.

3. AWARD OF CONTRACT FOR ALEXANDRA HOUSE AND 48 STATION ROAD REFURBISHMENT WORKS

The Cabinet Member for Finance and Transformation considered the report which sought, following the approval of the Station Road Refurbishment Works Programme at Cabinet in November 2021, to award a contract to carry out refurbishment and fitout works at Alexandra House and 48 Station Road, in order to meet the objectives of the programme.

Further to considering the exempt information,

The Cabinet Member RESOLVED

1. Pursuant to Contract Standing Order 16.02, to approve an award of contract to Alcema Ltd for the sum of £3,665,316 to deliver the part refurbishment and redecoration of Alexandra House and the full refurbishment of office floors in 48 Station Road.

2. Pursuant to Contract Standing Order 16.02, to approve the issuance of a letter of intent for up to 10% of the contract value, totalling £366,531.

3. To approve the contingency sum as set out in the exempt part of this report (Part B).

4. To approve the delegation as set out in the exempt part of this report (Part B).

Reasons for decision

The report “Station Road Refurbishment Works” approved at Cabinet on 9th November 2021 gave three reasons for programme.

Firstly, to deliver office accommodation improvements, noting the poor standard of existing office accommodation, and the need for essential maintenance as well as interior redecoration.

Secondly, to enable the continued adoption of flexible working, so that officers can work in and for the borough, whilst maintaining a good work-life balance through the adoption of Hybrid working. The plans will modernise audio-visual equipment, office layouts and furniture to provide a variety of work settings to enable greater cross-service collaboration and partnership working.

Thirdly, it supports short-term goals in the Accommodation Strategy, such as the release of 40 Cumberland Road to be repurposed as an Enterprise Hub. This aligns with the overall aim of relocating core office and civic functions to the refurbished Civic Centre in 2025, by ensuring the buildings the Council occupies in the interim are maintained in suitable condition.

The proposed contract enables the Council to meet these objectives and achieve value for money and delivery of the works within an acceptable timeframe.

The letter of intent is required to enable the preferred contractor to begin mobilisation at an early stage, thereby expediting delivery of the programme.

The rationale for the additional recommendation is also set out in the exempt part of the report.

Alternative options considered

Do Nothing

This option, which is not to appoint Alcema Ltd to undertake the proposed works, is not recommended as the Council would fail to achieve the agreed Accommodation objectives as set out it the November cabinet report.

This would mean the Council would be left without suitable office workspace for its staff, and significant operational difficulties in achieving plans for more flexible working.

Further information on why this is not recommended is set out in the Exempt Part B.

Other redecoration / refurbishment options

Other options for proceeding with a different scope of works were considered and rejected at an earlier stage and are set out in the November Cabinet Report.

4. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

That the press and public be excluded from the remainder of the meeting as item 5 contained exempt information, as defined in Section 100a of the Local Government Act 1972 (as amended by Section 12A of the Local Government Act 1985); paras 3 and 5, namely information relating to the financial or business affairs of any particular person (including the authority holding that information) and information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

5. EXEMPT - AWARD OF CONTRACT FOR ALEXANDRA HOUSE AND 48 STATION ROAD REFURBISHMENT WORKS

The Cabinet Member considered the exempt information.

CABINET MEMBER: Cllr Isidoros Diakides

Signed by Cabinet Member ……

Date …11 May 2022……..

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MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON FRIDAY, 18TH MARCH, 2022, 12.00 - 12.30 PM

PRESENT: Councillor Zena Brabazon, Cabinet Member for Early Years, Children, and Families.

In attendance: Ngozi Anuforo, Head of Strategic Commissioning, and Fiona Rae, Acting Committees Manager.

1. APOLOGIES FOR ABSENCE

There were no apologies for absence.

2. DECLARATIONS OF INTEREST

There were no declarations of interest.

3. ANNUAL CHILDCARE SUFFICIENCY REPORT

The Cabinet Member for Early Years, Children, and Families considered the report which noted that the Childcare Act 2006, and Early Education and Childcare statutory guidance, gave local authorities a duty to secure, so far as is reasonably practicable, childcare provision for children aged 0-14 and up to 18 for disabled children. The provision should be sufficient to meet the requirements of parents/carers to enable them to work or undertake education or training leading to work, and for their child to access their free entitlement place.

It was also noted that section 6 of the Childcare Act 2006 and statutory guidance stated that there should be an annual report 'to elected council members on how they are meeting their duty to secure sufficient childcare and make this report available and accessible to parents'. The Annual Childcare Sufficiency Report had been prepared to support this duty.

The report outlined childcare supply and demand progress since 2020, identifies key findings relating to childcare sufficiency during 2021 and provides key challenges and improvement actions for 2022.

In response to a question from the Cabinet Member, it was explained that childcare provision had remained reasonably resilient throughout the Covid-19 pandemic. It was noted that only three settings had closed in 2020 and, as this had occurred quite early in 2020, it was not clear that this had happened as a result of the pandemic.

In relation to the figures for the take up of places for early education and childcare, it was clarified that this related to the number of available places that were used rather than the total number of children who were taking up places. It was agreed that a

briefing note would be provided to the Cabinet Member outlining comparative data and observations between 2020-2021 and 2021-2022.

The Cabinet Member RESOLVED

To approve the Annual Childcare Sufficiency Report 2020-2021, as set out in Appendix 1, and to agree to its publication on the Council's website.

Reasons for decision

The reason for the recommendation is that a decision to approve the proposed Annual Childcare Sufficiency Report 2020 (Appendix 1), will ensure that the Council is fulfilling its statutory duty, under the Childcare Act 2006.

In addition, the Annual Childcare Sufficiency Report will provide an updated representation of Haringey's childcare market, enabling the Council to develop childcare plans to support the market and maximise childcare participation in the future.

Alternative options considered

The requirement to complete an Annual Childcare Sufficiency Report is part of the statutory requirement placed on the Council by the Childcare Act 2006.

CABINET MEMBER: Cllr Zena Brabazon

Signed by Cabinet Member ……

Date …22 March 2022…….

MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON FRIDAY, 18TH MARCH, 2022, 4.30 - 4.45 PM

PRESENT: Councillor Mike Hakata, Cabinet Member for Environment, Transport and the Climate Emergency.

In attendance: Simi Shah, Group Engineer – Traffic and Parking; Mark Stevens, Assistant Director Direct Services; and Fiona Rae, Acting Committees Manager.

1. APOLOGIES FOR ABSENCE

There were no apologies for absence.

2. DECLARATIONS OF INTEREST

There were no declarations of interest.

3. EXTENSION OF CYCLEWAY 1 (C1) ROUTE TO QUEEN STREET VIA WHITE HART LANE

The Cabinet Member for Environment, Transport and the Climate Emergency considered the report which reported on the feedback of statutory consultation carried out from 20 October to 12 November 2021, on the proposal to extend the current Cycleway 1 (C1) Route to Queen Street via White Hart Lane. The report also sought approval to proceed to implementation, having considered objections received to the statutory consultation.

The Cabinet Member RESOLVED

To approve the implementation of the proposed improvements to Cycleway C1 – Queen Street which includes:

(a) The extension of Cycleway 1 (C1) Route to Queen Street via White Hart Lane as detailed in Appendix (I); and
(b) The installation of the proposed modal filter in White Hart Lane at its junction with Queen Street.

Reasons for decision

The Council is required to consider the feedback received during the statutory notification period, in particular any objections to proposals, prior to proceeding to implementation. The proposals consulted upon are aimed at providing safe conditions for cyclists using the CS1 route but will also benefit pedestrians.

Alternative options considered

None.

CABINET MEMBER: Cllr Mike Hakata

Signed by Cabinet Member ……

Date …21 March 2022……..

MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON FRIDAY, 18TH MARCH, 2022, 4.00 - 4.05 PM

PRESENT: Councillor John Bevan, Cabinet Member for Planning, Licensing, and Housing Services.

In attendance: Kurtis Lee, Director of Asset Management; Robbie Erbmann, Assistant Director for Housing; Simon Eversley, Interim Head of Arms Length Management Organisation (ALMO) Clienting; and Fiona Rae, Acting Committees Manager.

1. APOLOGIES FOR ABSENCE

There were no apologies for absence.

2. DECLARATIONS OF INTEREST

There were no declarations of interest.

3. STRUCTURAL REMEDIAL WORKS PACKAGE FOR EDGECOTT GROVE, CORDELL HOUSE, AND CHETTLE COURT

The Cabinet Member for Planning, Licensing, and Housing Services considered the report which sought approval for the award of a contract to the preferred contractor in Appendix A to carry out external structural repair and renewal works at Chettle Court, Cordell House and Edgecot Grove. The contract award would be for the sum of £1,366,363.08 and included a contingency sum as shown in Appendix A. The report also sought approval for the issue of a letter of intent to the preferred contractor. This would be for an amount up to, but not exceeding, £136,636.31. This represented 10% of the contract sum. It was further recommended that the Cabinet Member approves the professional fees of £101,315.82, which represented 7.415% of the contract sum. Details of the preferred contractor were outlined in Appendix A (exempt information) of the report.

In response to a question from the Cabinet Member, it was explained that, where possible, works were delivered holistically but that the proposed works in this case were essential and could not be delayed.

The Cabinet Member RESOLVED

1. Pursuant to the Council's Contract Standing Order (CSO) 16.02, to approve the award of a contract to the preferred contractor (named in the exempt part of the report) to carry out brick work and concrete repairs to Chettle Court, Cordell House and Edgecott Grove blocks. The works also include repairs to steelwork supports and associated repairs to the existing underpass at Chettle Court as well as the repairs and/or replacement of the timber cladding to the walkways. In addition to

these works, the main roof at Cordell House will be replaced. This will be for a total sum of £1,366,363.08 and includes a contingency sum as shown in **Appendix A.**

2. To approve the issue of a letter of intent for an amount of up to, but not exceeding £136,636.31, which represents 10% of the contract sum.

3. To approve the total professional fees of £101,315.82, which represents 7.415 % of the contract sum.

4. To approve the total project costs of £1,467,678.90.

Reasons for decision

Homes for Haringey requires the Cabinet Member's approval to award the contract for structural works at Chettle Court, Cordell House and Edgecot Grove, which includes, brickwork and concrete repairs to all blocks. The works also include repairs to steelwork supports and associated repairs to the existing underpass at Chettle Court as well as repairs and/or replacement of the timber cladding to the walkways. In addition to these works, the main roof at Cordell House will be replaced. These works will preserve, protect and improve the appearance and structural strength of the buildings.

Homes for Haringey requires the Cabinet Member's approval for the award of this contract, which is deemed to represent value for money. This is following a tender process undertaken in conjunction with Haringey Council's Procurement team via the London Construction Programme (London Construction Programme) framework and processes.

The tender process was carried out in accordance with the framework requirements that incorporate price and quality. The preferred contractor scored the highest in relation to these criteria in the associated lot 1.1B.

Alternative options considered

An alternative option would be for Homes for Haringey to use third party industry frameworks or a tender process that is compliant with the Public Contracts Regulations 2015 to deliver the remedial works to the blocks Chettle Court, Cordell House and Edgecot Grove. Homes for Haringey sought support and advice from Haringey Strategic Procurement and determined the London Construction Programme framework, as being the optimum route to the market. This was due to the speed of access to quality-checked contractors and focus on companies that concentrate their resources in the local area.

A do-nothing option would mean the Council is not able to deliver external capital investment works to bring the estate up to the Decent Homes standard, in accordance with the Asset Management Strategy 2020-25.

4. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

That the press and public be excluded from the remainder of the meeting as item 5 contained exempt information, as defined in Section 100a of the Local Government Act 1972 (as amended by Section 12A of the Local Government Act 1985); paras 3 and 5, namely information relating to the financial or business affairs of any particular person (including the authority holding that information) and information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

5. EXEMPT - STRUCTURAL REMEDIAL WORKS PACKAGE FOR EDGECOTT GROVE, CORDELL HOUSE, AND CHETTLE COURT

The Cabinet Member considered the exempt information.

CABINET MEMBER: Cllr John Bevan

Signed by Cabinet Member ……..

Date …21 March 2022……

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MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON THURSDAY, 31ST MARCH, 2022, 9.30 - 9.35 AM

PRESENT: Councillor Mike Hakata, Cabinet Member for Environment, Transport and the Climate Emergency.

In attendance: Sarah Jones, Events and Partnerships Manager, and Fiona Rae, Acting Committees Manager.

1. APOLOGIES FOR ABSENCE

There were no apologies for absence.

2. DECLARATIONS OF INTEREST

There were no declarations of interest.

3. PARK HIRE APPLICATIONS FOR FUNFAIRS IN FINSBURY, MARKFIELD AND PRIORY PARKS AND DUCKETTS COMMON 2022

The Cabinet Member for Environment, Transport and the Climate Emergency considered the report which sought a determination of five applications made by three different funfair operators including Manning's Amusements Limited to hire (1) Finsbury Park between 28 March and 19 April 2022 and (2) Ducketts Common between 20 June and 04 July 2022; Manning's Fairview Company Ltd to hire (3) Priory Park between 14 April 2022 and 03 May 2022 and (4) Markfield Park between 13 June and 27 June 2022; and Carters Entertainment Ltd to hire (5) Priory Park between 21 June and 5 July 2022, for funfair events.

The report noted that the applications were required to be determined pursuant to the Council's Outdoor Events Policy (the Policy), which was approved by Cabinet on 17 December 2013, and implemented on 07 January 2014.

The Cabinet Member RESOLVED

1. To consider, and take account of, the comment received from a recognised stakeholder of Finsbury Park in response to the event notification being sent as part of the decision-making process (attached as Appendix 2 to the report).

2. To authorise the Director of Environment and Neighbourhoods, to approve conditional in-principle agreement to hire Finsbury Park, Ducketts Common, Markfield Park and Priory Park to the funfair operators for the events detailed in this report as set out in paragraph 6.5, subject to:

(i) the events being permissible under any then prevailing government legislation and guidance in relation to the Covid-19 pandemic, and
(ii) with the agreement of the Council's (interim) Director of Public Health.

3. To authorise the Director of Environment & Neighbourhoods to enter into agreements and or to grant permissions to hire Finsbury Park, Ducketts Common, Markfield Park and Priory Park to the funfair operators (for the events detailed in this report as set out in paragraph 6.5) provided that the Director of Environment and Neighbourhoods is satisfied with the terms of any proposed agreements and permissions.

Reasons for decision

Under the terms of the Policy, applications of the type detailed in this report are required to be determined with the prior agreement of the Cabinet Member.

If authority is given, then officers will give in-principle agreement to the Applicants for the event applications to progress. The events will then be subject to discussions between the Applicant and the Council before final agreement is given.

The rejection of the applications would have implications for the Parks & Leisure Service budget and reduce the opportunity for reinvestment into Finsbury Park, Ducketts Common, Markfield Park and Priory Park. It would also mean that the wider cultural and economic benefits to the borough were lost.

Alternative options considered

In adopting the Policy, the Council established its commitment to using parks for a limited number of funfairs and circuses each year. Accordingly, the only other alternative option which could be considered would be to reject the applications. That option was rejected, on the grounds that the events did not fall within any of the grounds set out in paragraph 5.3 of the Policy for automatic refusal.

4. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

That the press and public be excluded from the remainder of the meeting as item 5 contained exempt information, as defined in Section 100a of the Local Government Act 1972 (as amended by Section 12A of the Local Government Act 1985); paras 3 and 5, namely information relating to the financial or business affairs of any particular person (including the authority holding that information) and information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

5. EXEMPT - PARK HIRE APPLICATIONS FOR FUNFAIRS IN FINSBURY, MARKFIELD AND PRIORY PARKS AND DUCKETTS COMMON 2022

The Cabinet Member considered the exempt information.

CABINET MEMBER: Cllr Mike Hakata

Signed by Cabinet Member ……

Date …31 March 2022…….

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MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON THURSDAY, 31ST MARCH, 2022, 10.45 - 10.50 AM

PRESENT: Councillor Lucia das Neves, Cabinet Member for Health, Social Care, and Well-Being.

In attendance: Sujesh Sundarraj, Commissioning Manager; Priti Mohanty, Procurement Officer; Charlotte Pomery, Assistant Director for Commissioning; and Fiona Rae, Acting Committees Manager.

1. APOLOGIES FOR ABSENCE

There were no apologies for absence.

2. DECLARATIONS OF INTEREST

There were no declarations of interest.

3. AWARD OF CONTRACT FOR THE PROVISION OF POSITIVE BEHAVIOUR SUPPORT (PBS) SERVICE - CARE AND SUPPORT FOR PERSON A

The Cabinet Member for Health, Social Care, and Well-Being considered the report which detailed the outcome of a mini-competition process conducted via the Council's Adults Supported Living Dynamic Purchasing System (DPS) for Positive Behaviour Support (PBS) Services and sought approval to award a 'Call-Off' contract (hereafter Service Agreement) to the successful tenderer (identified in Appendix 1 - Part B (exempt information) of this report) in accordance with the Contract Standing Order (CSO) 9.07.1 (d) and 16.02.

The report noted that the successful service provider would deliver the PBS Services to Person A (service user – identified in Appendix 1 – Part B (exempt information) of this report) in a property based in Milton Keynes. The provider would be required to provide care and support as defined by the needs of Person A and be responsible reporting for the Health and Safety of the building to landlord on behalf of Person A.

Subject to approval, the Service Agreement would be awarded for a period of (7) seven years commencing from 1 April 2022 and (unless terminated earlier in accordance with law, placement breakdown or any provisions within the Supplier Agreement) would remain in force until 31 March 2029.

Officers highlighted that the start date for the service agreement in the report and recommendations was stated as 1 April 2022 – 31 March 2029. However, as the report was considered for Cabinet Member Signing on 31 March 2022 and would have a statutory call-in period of five working days, the outcome of the procurement process would not be able to be notified until 12 April 2022. Taking into account the timescales

required for the provider to sign and given the holiday period, the contract was expected to start on 21 April 2022 and would end on 20 April 2029.

The Cabinet Member RESOLVED

1. In accordance with Contract Standing Order 9.071 (d) and 16.02, to approve the award of a Service Agreement to deliver PBS Service care and support to Person A to successful tenderer (identified in Appendix 1 - Part B (exempt information) of this report) for a period of seven (7) years commencing from **21 April 2022** to **20 April 2029** at the estimated cost of £5.1 million (breakdown of cost is described in Appendix 1 – Part B (exempt information) of this report) inclusive of London Living Wage for first 18 months.

2. To vary the contract price annually commencing from 1 October 2023 to provide annual uplift. The annual price uplift will be capped to a maximum of London Living Wage (LLW) rate of inflationary increase as published by the Living Wage Foundation periodically; and

3. To waive Contract Standing Order (CSO) 9.08.8 (requirement to execute the contract under seal as a deed where value of the contract is above £250,000) as permitted under CSO 10.01.1(a) as the Service Agreements are electronic on the Council's Adults Supported Living Dynamic Purchasing System (DPS).

Reasons for decision

The decision to award a Service Agreement to the successful tenderer is based on the conclusion of a competitive procurement process. The proposed recommendation to award the Service Agreement is made according to the outcome of the Most Economically Advantageous Tender, as detailed in section 6 of this report.

The recommended service provider is one of the country's largest not-for-profit organisations and has extensive experience in supporting people with learning disabilities, autism, behaviours of distress and those with complex health needs. The provider has submitted a strong tender bid that clearly demonstrates significant expertise and commitment to providing the appropriate and relevant care and support to Person A. The organisation also has a strong track record of delivering Positive Behaviour Support services to the Transforming Care cohort.

Positive behaviour support (PBS) is a person-centred framework for providing long-term support to people with a learning disability, and/or autism, including those with mental health conditions, who have, or may be at risk of developing, behaviours that challenge. It is a blend of person-centred values and behavioural science and uses evidence to inform decision-making.

The use of the PBS Framework will bring several benefits: Services will be based on a PBS approach to improve life outcomes of vulnerable service users who present 'challenging behaviours' to live in a community setting. The provider's performance will be judged according to the extent to which the agreed outcomes are met and the extent to which an individual's independence is maintained with stable or decreased care and support needs. All providers on the framework, in partnership with the

Council, will be expected to measure and record achievement of individual outcomes and meet the requirements of the Council's Performance Monitoring Tool where the outcomes payments will be based.

The Service Provider will be required to ensure that all staff engaged in the delivery of the Services to Person A are rewarded fairly without unreasonable deductions from pay and will be paid hourly rates no less than the London Living Wage (LLW) in line with our wider commitment to paying LLW across all care services.

The Positive Behaviour Support model gives the flexibility to step down Person A's package of care over time. The payment model for a PBS provider on the Framework is outcomes related; 80% of flat weekly fee will be paid monthly in arrears based on sustainment of placement and remaining 20% of flat weekly fee will be paid pro-rata, quarterly in arrears linked to delivery of basket of outcomes. When services are sourced using the PBS Framework agreement, 15% of the Care and Support costs will be paid by the Big Lottery, Commissioning Better Outcomes Fund.

Alternative options considered

No alternative option was considered as Person A has had a number of discharges to supported living, residential care and direct payment provision resulting in re-admission to hospital (one placement lasting no more than 15 days). Taking all this into account a clinical decision was reached that Person A required a bespoke service to be developed to enable him to transition successfully from hospital to the community.

Person A's needs are highly complex resulting in him having spent a considerable amount of time in a long stay Assessment and Treatment Unit in hospital. In light of this, the future care and support offer must be able to meet Person A's needs and be able to respond to his highly challenging behaviours. PBS is a person-centred approach to supporting people who display or are at risk of displaying behaviours, which challenge. It involves understanding the reasons for the behaviour and considering the person as a whole - including their life history, physical health and emotional needs - to implement ways of supporting them. It focuses on creating physical and social environments that are supportive and capable of meeting people's needs, and teaching people new skills to replace the behaviours, which challenge. In the opinion of practitioners, the PBS approach will support Person A, who presents 'challenging behaviours' to live in a community setting and develop within a safe and nurturing environment.

Seeking the delivery through the Positive Behaviour Support Framework from an external provider was selected as the optimal way to meet the needs of Person A at the outset and over time as it allows for a high level of care from the start to support Person A to settle into the new and different environment of a supported living setting.

4. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

That the press and public be excluded from the remainder of the meeting as item 5 contained exempt information, as defined in Section 100a of the Local Government Act 1972 (as amended by Section 12A of the Local Government Act 1985); paras 3 and 5, namely information relating to the financial or business affairs of any particular person (including the authority holding that information) and information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

5. EXEMPT - AWARD OF CONTRACT FOR THE PROVISION OF POSITIVE BEHAVIOUR SUPPORT (PBS) SERVICE - CARE AND SUPPORT FOR PERSON A

The Cabinet Member considered the exempt information.

The Chair of Overview and Scrutiny has been informed that it was impracticable to give 28 days' notice of the decision. This decision was originally included on the Forward Plan for decision between 5 March 2022 and 18 March 2022. This decision seeks to provide Positive behaviour support (PBS) which is a person-centred framework for providing long-term support to people with a learning disability, and/or autism, including those with mental health conditions, who have, or may be at risk of developing, behaviours that challenge. It is a blend of person-centred values and behavioural science and uses evidence to inform decision-making.

As this decision relates to the specific needs of an individual and it highly personalised, some additional time was required to ensure that the arrangements would be appropriate. As such, the timeframe has been updated and it is highlighted that a timely decision is required in order to ensure that appropriate arrangements are in place for this individual.

Given the above, it is not practicable to comply with the 28-day notice requirement in Part Four, Section D, Rule 13 of the constitution. This is set out in Part Four, Section D, Rule 16, of the Constitution.

CABINET MEMBER: Cllr Lucia das Neves

Signed by Cabinet Member ……

Date …31 March 2022……

MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON FRIDAY, 22ND APRIL, 2022, 2.00 - 2.10 PM

PRESENT: Councillor Seema Chandwani, Cabinet Member for Customer Service, Welfare, and the Public Realm.

In attendance: David Graaff, Head of Service Delivery, and Fiona Rae, Acting Committees Manager.

1. APOLOGIES FOR ABSENCE

There were no apologies for absence.

2. DECLARATIONS OF INTEREST

There were no declarations of interest.

3. COUNCIL TAX (ENERGY) REBATE DISCRETIONARY SCHEME

The Cabinet Member for Customer Service, Welfare, and the Public Realm considered the report which noted that the Government issued the guidance for the delivery of the Council Tax Rebate scheme on 16 March 2022. This included the core scheme of payments to qualifying occupiers of properties in Council Tax bands A-D.

It was explained that the Council was required to develop and publish a discretionary scheme in accordance with the requirements set out in the Guidance issued by the Government. The report set out the proposed discretionary scheme in Appendix A.

RESOLVED

1. To approve Haringey's Discretionary Council Tax (Energy) Rebate Scheme April 2022 (as set out in Appendix A) as the methodology to determine the allocation of funding in accordance with the guidance issued by Government.

2. To authorise the Director of Customers, Transformation, and Resources, after consultation with the Lead Member, to make appropriate amendments to the Discretionary Council Tax (Energy) Rebate Scheme April 2022 where considered necessary.

Reasons for decision

The Council is required to develop and publish a discretionary scheme in accordance with the requirements set out in the Guidance issued by the Government on 16 March 2022.

Alternative options considered

None.

The Chair of Overview and Scrutiny has been informed that it was impracticable to give 28 days' notice of the decision. The Government issued the guidance for the delivery of the scheme on 16 March 2022. The scheme is designed to make payments to those on low incomes and facing hardship who are excluded from the Council Tax Energy Rebate. Payments of the Council Tax Rebate will start to be made in April and May 2022.

The Council is seeking to publish the discretionary scheme as start making payments rapidly in order to minimise hardship in the groups identified in the published guidance but excluded from the main scheme.

Given the above, it is not practicable to comply with the 28-day notice requirement in Part Four, Section D, Rule 13 of the constitution. This is set out in Part Four, Section D, Rule 16, of the Constitution.

CABINET MEMBER: Cllr Seema Chandwani

Signed by Cabinet Member ……

Date …22 April 2022…….

MINUTES OF MEETING Cabinet Member Signing HELD ON Tuesday, 3rd May, 2022, 11.00am

PRESENT:

Councillors: Peray Ahmet - Leader of the Council

ALSO ATTENDING: Thomas Skeen, Charlotte Pomery and Ayshe Simsek

4. APOLOGIES FOR ABSENCE

There were no apologies for absence.

5. DECLARATIONS OF INTEREST

There were no declarations of interests put forward.

6. HOUSEHOLD SUPPORT FUND IN HARINGEY

The Government, through the Department of Works and Pensions (DWP) launched the Household Support Fund in October 2021 for the period October 2021 – March 2022. The Government had further announced that the Household Support Fund would be extended for the period 1st April – 30th September 2022. The objective of the Scheme was to provide support to vulnerable households and families with children struggling with the significant rise in living costs with an emphasis on supporting households with energy, food and water bills. Local authorities were responsible for administering the Scheme and funding had been allocated to each authority. Haringey Council had been allocated £2,406,671.72 for the six month period April – September 2022.

The funding would enable the Council to provide support to families with children, other vulnerable households and individuals. The Household Support Fund will allow the Council to extend and expand its support to households in food or fuel poverty.

This report was seeking Leader approval for the proposed arrangement for the initial spend of funding as set out in the policy document (attached) to the report, which was within the conditions stipulated by DWP. This decision would be followed by a second decision to allocate the remaining funding available.

This decision was agreed as urgent by the Chair of Overview and Scrutiny as there was a need for schools to put in place the mechanisms to enable payments to be made to support families with children, in line with the draft guidance, and to continue to access Free School Meals vouchers during the May half term school holiday.

RESOLVED

1. To approve the additional Housing Support Fund allocation from the Government of £2,406,671.72 for the period April – September 2022.

2. To approve the Household Support Fund Scheme Policy: April 2022 which sets out the Council's arrangement for administering part of the additional funding and is attached at Appendix 1.

3. To delegate authority to the Assistant Director Commissioning, in consultation with the Leader of the Council, to amend this policy to give effect to changes in legislation, statutory or non statutory guidance, or directives or instructions of a similar character issued by Government.

4. To agree that this policy is subject to the availability of government funding and will terminate on 30th September 2022 unless terminated earlier

5. To note that a further set of recommendations for spend of the existing funding will come forward in due course and within the requirements of guidance.

Reasons for decision

The Government through the Department of Works and Pensions (DWP) has provided funding to local authorities to administer the Household Support Fund. It is acknowledged that local authorities have the local ties and knowledge and are best placed to allocate funding according to local need.

The Guidance for the Scheme, which remains draft at this stage, provides for local authorities to determine eligibility in their area and target support to those most in need but within the scope of conditions set by DWP. The proposed decision on the Household Support Fund sets out how the Council will target and deliver support to residents. This spend is targeted to those that are most in need and is in accordance with the Scheme.

The Household Support Fund payments are expected to support households over the grant period and for all funding to be spent between 1st April 2022 and 30th September 2022. The Council has identified that the cohort of families with children who have low household income and are eligible to receive free school meals vouchers, are both particularly impacted by the current economic environment and meet the criteria set out in the draft guidance and therefore will be supported under the continued Household Support Fund. Without additional funding, there is a potential gap during holiday periods in support for families with children who access free school meals in term time, as directly provided free school meals are not available at this time. There is a need, therefore, for an urgent decision to be taken on the recommendation in order to ensure that payments are made to support families with children, in line with the draft guidance, to continue to access Free School Meals vouchers during the May half term school holiday.

Alternative options considered

The alternative option considered was not to develop a Haringey Support Fund Policy. This was discounted as it would not have made use of potential support to Haringey residents and would have necessitated a return of the funds to central government.

A further option was to bring forward plans to allocate the total amount of funding at this stage, but as the guidance remains draft and more work needs to be carried out in order to ensure that the Fund is spent with maximum beneficial impact for local residents, this option was discounted.

Please be advised that the Chair of Overview and Scrutiny has further agreed that the call-in procedure shall not apply to this urgent decision. This is because the decision is urgent and any delay in implementation caused by the call-in procedure would seriously prejudice the Council's or the public's interests due to the fact that any delay in decision making will impact on the ability to utilise available funding to support households with children, other vulnerable households and individuals in Haringey. The Chair of Overview and Scrutiny Committee has agreed that the decision is both reasonable in all circumstances, and that it should be treated as a matter of urgency. This is in accordance with Part 4, Section H, and Paragraph 18 (a) and (b) of the Council Constitution.

CHAIR:

Signed by Chair ……..

Date ……

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MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON WEDNESDAY, 4TH MAY, 2022, 10.15 - 10.30 AM

PRESENT: Councillor Zena Brabazon, Cabinet Member for Early Years, Children, and Families.

In attendance: David Moore, Head of Construction Related Project Delivery, and Fiona Rae, Acting Committees Manager.

1. APOLOGIES FOR ABSENCE

There were no apologies for absence.

2. DECLARATIONS OF INTEREST

There were no declarations of interest.

3. STROUD GREEN PRIMARY SCHOOL - PHASE 2 EXTERNAL ENVELOPE AND BUILDING SERVICES IMPROVEMENT WORKS - VARIATION OF CONSTRUCTION CONTRACT

It was highlighted that there were some corrections to the original report that had been published. It was explained that there were no corrections to the proposal (to agree a variation in the sum of £385,000) but that some other figures, and the corresponding total figure, had been incorrectly stated. It was explained that the Cabinet approval on 15 September 2021 had been for a sum of £1,648,491.33 (£1,498,628.48 construction contract sum plus client construction contingency of 10% that equated to £149,862.85), rather than the figure stated in the report (1,498,628.48), and that the total contract sum would now be £2,033,491.33, rather than the figure stated in the report (1,883,628.48). It was also noted that any amendments were highlighted in bold text in the minutes. The corrections were noted by the Cabinet Member.

The Cabinet Member for Early Years, Children, and Families considered the report which noted that, on 15 September 2021, Cabinet approved an award of a construction contract to Cosmur Construction London Ltd for the Phase 2 of the construction works at Stroud Green Primary School in the sum of **£1,648,491.33 (£1,498,628.48 construction contract sum plus client construction contingency of 10% that equated to £149,862.85).** The report sought Cabinet approval to vary the original approved contract and contingency sum with Cosmur Construction London Ltd for the sum of £385,000, as allowed under Contract Standing Order (CSO) 10.2.1.b.

The Head of Construction Related Projects stated that, as the school was a listed building and was located in a conservation area, any decision would be subject to the relevant planning and conservation requirements. It was also noted that, due to the

additional works required, the works at the school were now scheduled to finish outside of the school summer holiday period. The Cabinet Member requested that the Headteacher was provided with regular updates. It was confirmed that there were regular meetings between the Project Team and the Headteacher. It was added that there was now a security guard on site, that safeguarding arrangements for the site had been reviewed, and that the school could raise out of hours concerns with the Project Team.

The Cabinet Member RESOLVED

To approve a variation of the construction contract to Cosmur Construction London Ltd in the sum of £385,000. The original construction contract award approved by Cabinet for Stroud Green Primary School was in the sum of **£1,648,491.33 (£1,498,628.48 construction contract sum plus client construction contingency of 10% that equates to £149,862.85).** Approval of the variation will give a total contract sum of up to **£2,033,491.33**.

Reasons for decision

During construction, and once the scaffold was erected around the main building, it became apparent that the roof tiles were in a far worse condition than originally surveyed and it is far more economical to re-roof the main building then undertake patch repairs. Under guidance of the Haringey Conservation officer (as the building is Grade 2 listed) an independent heritage specialist was procured to survey the roof. The heritage specialist reported the same conclusion that viewing the tiles from afar and even from a few meters away the outer slopes appear sound, but closer inspection and removal of a number of larger sample tiles revealed significant concealed delamination and damage. The recommendation is to retile the outer slopes with new tiles and reuse as many tiles as possible on the inner slopes.

The original project budget set at the client brief stage for each of the schools remains in place and overall is sufficient to cover the contract variation.

Alternative options considered

Do nothing – a decision not to support the increase in the value of the construction works contract will result in delays in completing urgent condition works and would also leave the schools with a defective roof with a short life span remaining.

The Chair of Overview and Scrutiny has been informed that it was impracticable to give 28 days' notice of the decision. On 14 September 2021, Cabinet agreed for works to be undertaken at Stroud Green Primary School, including some roof works. Initial surveys had indicated that minor roof patching was required. However, during these works, it has been identified that the tiles were in worse condition than anticipated. Following additional surveying, it has been established that it would be more economical and prudent to undertake re-roofing instead of patching.

It was not possible to provide 28 days' notice as any delay would expose the council to Extension of Time claims from the contractor which could be in excess of £50,000.

Given the above, it is not practicable to comply with the 28-day notice requirement in Part Four, Section D, Rule 13 of the constitution. This is set out in Part Four, Section D, Rule 16, of the Constitution.

CABINET MEMBER: Cllr Zena Brabazon

Signed by Cabinet Member ……

Date …4 May 2022…….

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MINUTES OF URGENT DECISIONS MEETING HELD ON FRIDAY, 18TH MARCH, 2022, 1.30 - 1.35 PM

PRESENT: Councillor Peray Ahmet, Leader of the Council.

In attendance: Mark Stevens, Assistant Director Direct Services, and Fiona Rae, Acting Committees Manager.

1. APOLOGIES FOR ABSENCE

There were no apologies for absence.

2. DECLARATIONS OF INTEREST

There were no declarations of interest.

3. CALL-OFF AGREEMENTS FOR THE PROVISION OF HIGHWAYS AND TRANSPORT CONSULTANCY SERVICES

The Leader of the Council considered the report which sought approval for the Assistant Director Direct Services to enter into three non-binding call-off agreements, with an aggregated value not exceeding £1m per annum, across all three named service providers on Lot 3 (Transport and Engineering Services) of the 2021 Ealing Highways and Transportation Services Framework ("Framework"), in accordance with Contract Standing Order (CSO) 7.01 b. It was noted that each call-off would be in accordance with the Framework terms and conditions, which was in order of supplier ranking. The Framework had a duration of four years, expiring 31 October 2025. Therefore, the maximum permissible aggregated value of contracts per borough under Lot 3 would be £4m.

It was noted that having three separate call-off facilities enabled the Council to respond and mobilise transport and engineering services more rapidly, without the need to obtain further approvals from Cabinet for any individual awards above £500k. All expenditure under this Framework would be within the Environment and Neighbourhood Directorate's allocated budgets for the individual services and works.

In response to a question from the Leader, it was noted that the arrangements would be used in order to call on additional resources in situations where external specialism was required or where something could not be delivered within Highways and Parking and there was a need for additional resources.

The Leader RESOLVED

To approve the Council entering into three individual non-binding call-off agreements with the following service providers:

a) Project Centre Ltd
b) Gutteridge, Haskins and Davey Ltd, and
c) WSP UK Ltd

up to an aggregated value not exceeding £1m per annum, across all three named service providers above on Lot 3 (Transport and Engineering Services) of the 2021 Ealing Highways and Transportation Services Framework Contract, until its expiry on 31 October 2025, in accordance with Contract Standing Order (CSO) 7 .01 b. (selecting one or more 'contractors' from a framework) and CSO 9.07 1 d) (contracts valued over £500k may be awarded by Cabinet) and CSO 16.02.

Reasons for decision

There are occasions when internal resources are not able to deliver services in addition to their current work programme, given the fluctuating workload and availability of funding. It is more cost-effective to make use of external consultancy services to cater for such peaks in the work programme.

Having a flexible call-off arrangement under the Framework enables the Council to respond quickly to unforeseen events and reduces the resources and effort required to undertake procurements and expediate the Council's governance processes.

Alternative options considered

Doing nothing is not an option, bearing in mind the need for additional professional and technical resources to ensure the delivery of the extensive highway and traffic related programmes required over the next few years.

Whilst an option would be to separately tender for the required additional services, this would represent an avoidable drain on resources when frameworks already exist that are accessible to the Council.

The contractual arrangements described in this report are intended to ensure that the Council can access the needed professional and technical support. Whilst the Council will keep alternative procurement strategies under review, the use of the contracts let by Ealing Council have historically been used extensively by other London Boroughs and have proved to be a cost-effective option due to the resulting economies of scale.

The Chair of Overview and Scrutiny has agreed that the decision is both reasonable in all the circumstances and that it should be treated as a matter of urgency for the following reasons:

The call-off agreements referred to in the report are required in order for the Council to procure transport and engineering-related consultancy services and, if they are not in place before 1 April 2022, the implementation of next year's works programmes for Highways and Parking Services will be significantly delayed. Due to the call-off agreements under the framework crosscutting three Cabinet Member portfolios, it became apparent that the Leader would be required to give approval rather than one Cabinet Member doing so.

Given the above, and the need to ensure the delivery of works programmes, it is not practicable to comply with the 28-day notice requirement in Part Four, Section D, Rule 13 of the constitution or the 5-day notice period requirement for key decisions. This is set out in Part Four, Section D, Rule 16, of the Constitution. As set out below, the decision is urgent and time critical in accordance with Part 4 Section H paragraph 18 (a) and 18 (b).

Please be advised that the Chair of Overview and Scrutiny has further agreed that the call-in procedure shall not apply to this urgent decision. This is because the decision is urgent and any delay in implementation caused by the call-in procedure would seriously prejudice the Council's or the public's interests as the contracts need to be in place by 1 April 2022 and a delay would prevent the Highways and Parking Service from seeking the delivery of transport and engineering-related services that the internal resource is currently unable to provide. Given that the scale of work that the Cabinet committed to on 8 March 2022 in relation to the investment plans for 2022/23 for Highways and Street Lighting, Parking, Flood Water Management and Road Danger Reduction, any delay in the commissioning of work through the proposed call-off agreements would seriously prejudice the Council's and/or the public's interests, given the improvements that these investment plans will deliver in Haringey in the forthcoming 12 months. The Chair of Overview and Scrutiny Committee has agreed that the decision is both reasonable in all circumstances, and that it should be treated as a matter of urgency. This is in accordance with Part 4, Section H, and Paragraph 18 (a) and (b) of the Council Constitution.

LEADER: Cllr Peray Ahmet

Signed by Leader ……

Date …22 March 2022…….

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MINUTES OF URGENT DECISIONS MEETING HELD ON THURSDAY, 31ST MARCH, 2022, 2.00 - 2.15 PM

PRESENT: Councillor Lucia das Neves, Cabinet Member for Health, Social Care, and Well-Being.

In attendance: Charlotte Pomery, Assistant Director for Commissioning, and Philip Slawther, Principal Scrutiny Officer.

1. APOLOGIES FOR ABSENCE

There were no apologies for absence.

2. DECLARATIONS OF INTEREST

There were no declarations of interest.

3. SECTION 75 NHS ACT 2006 HEALTH AND SOCIAL CARE LEAD COMMISSIONING AND POOLED FUNDS PARTNERSHIP AGREEMENT BETWEEN THE COUNCIL AND NCL CCG

The Cabinet Member for Health, Social Care, and Well-Being considered the report which noted that Haringey Council (the Council) and North Central London Clinical Commissioning Group (the CCG) had in place, since March 2017, a model of commissioning and pooled budgets supported by a partnership agreement under S.75 of the National Health Services Act 2006. The partnership agreement set out shared outcomes and objectives, and contained detailed schedules enabling:

i. Lead commissioning for specified care groups
ii. Pooled budgets for specified care groups

The report noted that the partnership agreement acted as a framework for a range of schedules, which had allowed flexibility and adaptability and ensured that the commissioning and pooled budgets in place met local need. The partnership agreement was initially in place for five years with the option to extend for a further two years. As the agreement expired at the end of March 2022, the report proposed use of the further 2 year extension period.

Officers noted some additional detail relating to paragraph 1.2 of the report and recommendation 3.1.1 (recommendation 1 below). It was explained that, as the agreement expired on 1 March 2022, the report proposed that the agreement be extended for a further 13 months through to 31 March 2023, with a further 1 year extension through to 31 March 2024 if agreed during 2022-23. A correction was also provided in relation to recommendation 3.1.2 (recommendation 2 below). It was noted that the delegation should be to the Director of Adults and Health, rather than the

Assistant Director for Commissioning. It was also noted that the delegation should give the authority to finalise and agree any further schedules to the S.75 Partnership Agreement between the Council and the CCG, rather than to finalise and agree the terms of the extension. The Cabinet Member noted and agreed these corrections.

The Cabinet Member RESOLVED

1. To approve the extension of the existing Section 75 Partnership Agreement between the Council and the CCG (Section 75 NHS Act 2006 Health and Social Care Lead Commissioning and Pooled Funds Partnership Agreement between the Council and NCL CCG) which provides for lead commissioning and pooled budgets across a range of schedules **for a period of 13 months to 31 March 2023 with an option to extend for a further 12 months to 31 March 2024**.

2. To delegate to the ~~Assistant Director for Commissioning~~ **Director of Adults and Health**, after consultation with the Lead Member for Health, Social Care and Well-Being, the authority to finalise and agree ~~the terms of the extension~~ **any further schedules to the S.75 Partnership Agreement between the Council and the CCG**.

Reasons for decision

The s. 75 Partnership Agreement has supported greater levels of integration between the NHS and the Council by enabling lead commissioning and pooled budgets across partners within a strategic framework as set out in the National Health Services Act 2006.

It remains the case that over the past five years of the Partnership Agreement's operation, local residents have continued to call for integration of health and care provision locally to support a better experience and to improve outcomes. By focusing on arrangements for pooling funding and integrating commissioning, the s. 75 Partnership Agreement already in place has enabled fuller integration creating greater strategic coherence to the joint work being developed. The Partnership Agreement in and of itself does not lead to changes to models of service delivery and any consultation on any redesigned services has taken place separately.

The s. 75 Partnership Agreement will expire if the extension is not put in place, which would undermine the joint approaches which continue to be developed as part of the work to create an Integrated Care System and a local Place-based Partnership in line with the Health and Care Bill, currently making its way through Parliament. The vision set out in the Partnership Agreement aligns with the focus on integration at both place and system indicated in the Bill's current provisions and both signatories support the proposed extension.

Alternative options considered

Consideration was given by officers to allowing the s. 75 Partnership Agreement to lapse at the end of its current term, in March 2022. This approach, however, would risk the joint arrangements and increasing drive towards greater integration reflected by both local working patterns and national policy.

Consideration was also given to a deeper strategic review of the s. 75 Partnership Agreement currently in place, but as the Government in its recently published Integration White Paper has committed to a review of the legislation covering pooled budgets (ie section 75 NHS Act) it is felt that a wider review could risk being out of kilter with the government's approach.

The Chair of Overview and Scrutiny has agreed that the decision is both reasonable in all the circumstances and that it should be treated as a matter of urgency. The s. 75 Partnership Agreement expired on 1 March 2022 and provides a framework for lead commissioning, pooled budgets and integrated services as set out within the scope of the National Health Services Act 2006. It is imperative for this Agreement to be extended for a further term and the Agreement provides for this. There are several joint arrangements between the Council and the CCG that are currently in place across Haringey, detailed in a series of Schedules to this overarching Agreement, to best meet the needs of local residents with specific additional health and care needs.

These Schedules require the overarching Partnership Agreement to be in place in order to enable them to continue. As noted above, the Agreement expired on 1 March 2022 and it is imperative it is extended. With the changes to the health and care landscape set out in the Health and Care Bill currently going through Parliament, it was anticipated that the requirements for the s. 75 Partnership Agreement would differ and therefore an extension might not be required in its current form. This has turned out not to be the case, hence the urgency in requesting this extension be approved.

Given the above, it is not practicable to comply with the 28-day notice requirement in Part Four, Section D, Rule 13 of the constitution or the 5-day notice period requirement for key decisions. This is set out in Part Four, Section D, Rule 17, of the Constitution. As set out below, the decision is urgent and time critical in accordance with Part 4 Section H paragraph 18 (a) and 18 (b).

Please be advised that the Chair of Overview and Scrutiny has further agreed that the call-in procedure shall not apply to this urgent decision. This is because the decision is urgent and any delay in implementation caused by the call-in procedure would seriously prejudice the Council's or the public's interests as there is a need to continue with the current health and social care partnership arrangement between the Council and the CCG. This decision is considered to be urgent as extension of the agreement would enable the Council and CCG to continue with the existing commissioning and service provision arrangements and for the benefit of local residents. The Chair of Overview and Scrutiny Committee has agreed that the decision is both reasonable in all circumstances, and that it should be treated as a matter of urgency. This is in accordance with Part 4, Section H, and Paragraph 18 (a) and (b) of the Council Constitution.

4. SECTION 75 NHS ACT 2006 HEALTH AND SOCIAL CARE HARINGEY LEARNING DISABILITY PARTNERSHIP AGREEMENT

The Cabinet Member for Health, Social Care, and Well-Being considered the report which noted that Haringey Council (the Council), Barnet, Enfield and Haringey Mental Health Trust (the Mental Health Trust), Whittington Health NHS Trust (the Trust) and North Central London Clinical Commissioning Group (the CCG) worked together in partnership to deliver the Haringey Learning Disabilities Partnership (the Partnership). This Partnership operated as an integrated service hosted by the Council. The Partnership was supported by a health and social care partnership agreement under S.75 of the National Health Services Act 2006. The agreement has since lapsed and approval was sought for an updated agreement.

The report noted that the overall aim of the integrated service arrangements was to ensure that services for people with learning disabilities were planned, commissioned and provided in an integrated manner. The Agreement, presented for approval, supported this aim by enabling an integrated service offer, underpinned by pooled funds and a lead commissioning arrangement described in Haringey's s. 75 commissioning partnership agreement.

The Cabinet Member RESOLVED

1. To approve the draft Section 75 NHS Act 2006 Partnership Agreement (Haringey Learning Disability Partnership Agreement) attached at Appendix 1 between the Council, the Mental Health Trust, the Trust and the CCG which provides integrated service arrangements for adults with learning disabilities hosted by the Council.

2. To delegate to the Director of Adults and Health, after consultation with the Lead Member for Health, Social Care and Well-Being, the authority to finalise and agree any further details within the Section 75 Partnership Agreement between the parties.

Reasons for decision

The s. 75 Partnership Agreement has supported greater levels of integration between the NHS and the Council by enabling an integrated service for adults with learning disabilities in Haringey within the framework set out in the National Health Services Act 2006. However, the Agreement has now expired and its approval is urgently required to ensure the integrated service can continue to develop and to facilitate partner contributions to the pooled fund which underpin its operations.

The integrated service ensures that adults with learning disabilities are able to access integrated health, care and support services which meet their needs in a joined up and holistic way. The integrated service helps to support parity of esteem between mental and physical health and supports the most efficient use of resources across partners.

Partners have taken the opportunity to refresh the s. 75 Partnership Agreement to ensure that it aligns with the work being developed to create an Integrated Care System and a local Place-based Partnership in line with the Health and Care Bill, currently making its way through Parliament. The proposed five year period for the

Agreement will support a sustainable approach to integration which is in line with the wider policy and legislative landscape for health and care delivery over the coming years.

Alternative options considered

Consideration was given by officers to redesigning the service to separate out the elements which together create the integrated service. This approach, however, would by its very nature undo the joint arrangements which enable a holistic offer to adults with learning disabilities in Haringey and was therefore disregarded.

The Chair of Overview and Scrutiny has agreed that the decision is both reasonable in all the circumstances and that it should be treated as a matter of urgency. The s. 75 Haringey Learning Disability Partnership Agreement provides a framework for an integrated service for adults with learning disabilities in Haringey as set out within the scope of the National Health Services Act 2006. The existing s. 75 agreement which governs the integrated service has expired. In order to ensure that the contractual framework is in place to enable both the partners' continued funding for and the Council's continued management of the integrated service, it is necessary to renew the agreement urgently and by 1 April 2022. Without the contractual framework which enables funding transfers between the NHS and the Council, payments from partners will be at risk. Likewise, the Council's ability to manage the integrated service as a single entity across the partnership will be constrained.

With the changes to the health and care landscape set out in the Health and Care Bill currently going through Parliament, it was anticipated that the requirements for the s. 75 Partnership Agreement would changes and that therefore an extension might not be required in its current form. This has turned out not to be the case, hence the urgency in requesting this extension be approved. Given the above, it is not practicable to comply with the 28-day notice requirement in Part Four, Section D, Rule 13 of the constitution or the 5-day notice period requirement for key decisions. This is set out in Part Four, Section D, Rule 17, of the Constitution. As set out below, the decision is urgent and time critical in accordance with Part 4 Section H paragraph 18 (a) and 18 (b).

Please be advised that the Chair of Overview and Scrutiny has further agreed that the call-in procedure shall not apply to this urgent decision. This is because the decision is urgent and any delay in implementation caused by the call-in procedure would seriously prejudice the Council's or the public's interests as the s. 75 Haringey Learning Disability Partnership Agreement, which provides a framework for an integrated service for adults with learning disabilities in Haringey has expired. This decision is considered to be urgent as approval to enter into and continue the partnership agreement would enable the Council, the Barnet, Enfield and Haringey Mental Health Services Trust, Whittington Health Services NHS Trust, and the North Central London Clinical Commissioning Group to continue to provide the integrated service arrangement and meet their respective obligations, in particular, relating to payments and funding. The Chair of Overview and Scrutiny Committee has agreed that the decision is both reasonable in all circumstances, and that it should be treated

as a matter of urgency. This is in accordance with Part 4, Section H, and Paragraph 18 (a) and (b) of the Council Constitution.

5. SECTION 75 NHS ACT 2006 HEALTH AND SOCIAL CARE COVID-19 HOSPITAL DISCHARGE PARTNERSHIP AGREEMENT

The Cabinet Member for Health, Social Care, and Well-Being considered the report which noted that Haringey Council (the Council) working in partnership with the four other local authorities (Barnet, Camden, Enfield and Islington) within the North Central London sub-region and the North Central London Clinical Commissioning Group (the CCG) had in place, since March 2020, a partnership agreement under S.75 of the National Health Services Act 2006 in response to the global Coronavirus pandemic.

The report noted that the Partnership Agreement acted as a framework for a range of schedules and already covered three Schemes designed to support effect hospital discharge arrangements between the NHS and local government. It was introduced with the support of the Department for Health and Social Care (DHSC) over the period to March 2022. Partners had now determined that a further 3 Schemes, 4, 5 and 6, as detailed in the attached variation, would continue to support smooth discharge arrangements between partners. The report therefore sought approval for the partnership agreement and the additional Schemes now deemed to be required.

Officers provided a correction in relation to recommendation 3.1.3 (recommendation 3 below). It was noted that the delegation should be to the Director of Adults and Health, rather than the Assistant Director for Commissioning. The Cabinet Member noted and agreed this correction.

The Cabinet Member RESOLVED

1. To approve Haringey Council's participation in the existing Section 75 Partnership Agreement (Covid-19 Hospital Discharge Partnership Agreement) between the Councils of North Central London and the CCG which provides for lead commissioning and pooled budgets across a range of schedules.

2. To approve the variation to include three further Schemes, 4, 5 and 6, as set out in Appendix 2.

3. To delegate to the ~~Assistant Director Commissioning~~ **Director of Adults and Health**, after consultation with the Lead Member for Health, Social Care and Well-Being, the authority to finalise and agree any further schedules to the Section 75 Partnership Agreement between the Councils of North Central London and the CCG.

Reasons for decision

The s. 75 Partnership Agreement has supported greater levels of integration between the NHS and the Councils of North Central London by enabling lead commissioning and pooled budgets across partners within a strategic framework as set out in the National Health Services Act 2006.

The Agreement has enabled additional NHS funding to be made available to local government through the CCG to support hospital discharge arrangements during the Coronavirus pandemic. Given the existing pressures on both the NHS and local government social care such support is required to meet local need.

The Council will fail to benefit from significant additional funding being made available to support local social care arrangements should the approvals sought not be forthcoming. The vision set out in the Partnership Agreement aligns with the partnership work, effective use of pooled budgets and integrated working at pace which have been features of the Covid response across North Central London.

Alternative options considered

Consideration was given by officers to suggesting the Council does not participate in this s. 75 Partnership Agreement. However, this approach would reduce the funding available to the local authority to support residents being discharged from hospital and directly therefore affect the funding available to the wider adult social care cohort.

The Chair of Overview and Scrutiny has agreed that the decision is both reasonable in all the circumstances and that it should be treated as a matter of urgency. Partners are keen to vary the s. 75 Hospital Discharge Partnership Agreement to ensure that additional funding very recently made available in light of the Covid-19 pandemic can be used most effectively to respond to local need and support the longer-term sustainability of health and social care.

The proposal for a variation to enable additional funding to be safeguarded for local residents has recently come forward and partners have had to act at pace to ensure that Councils can agree to accept the additional funding as indicated. Given the above, it is not practicable to comply with the 28-day notice requirement in Part Four, Section D, Rule 13 of the constitution or the 5-day notice period requirement for key decisions. This is set out in Part Four, Section D, Rule 17, of the Constitution. As set out below, the decision is urgent and time critical in accordance with Part 4 Section H paragraph 18 (a) and 18 (b).

Please be advised that the Chair of Overview and Scrutiny has further agreed that the call-in procedure shall not apply to this urgent decision. This is because the decision is urgent and any delay in implementation caused by the call-in procedure would seriously prejudice the Council's or the public's interests as the variation of the 75 Hospital Discharge Partnership Agreement would ensure that additional funding very recently made available in light of the Covid-19 pandemic can be used most effectively to respond to local need and support the longer-term sustainability of health and social care. This decision is considered to be urgent as the Council needs to accept the additional funding as soon as possible to enable additional funding to be safeguarded for local residents. The Chair of Overview and Scrutiny Committee has agreed that the decision is both reasonable in all circumstances, and that it should be treated as a matter of urgency. This is in accordance with Part 4, Section H, and Paragraph 18 (a) and (b) of the Council Constitution.

CABINET MEMBER: Cllr Lucia das Neves

Signed by Cabinet Member ……

Date …1 April 2022…….

MINUTES OF MEETING Cabinet Member Signing HELD ON Wednesday, 11th May, 2022, 11.00am – 12pm

PRESENT:

Councillors: Zena Brabazon – Cabinet Member for Early Years, Children and Families.

ALSO ATTENDING: Claire Barnes, Sylvester Olutayo, Ayshe Simsek

4. APOLOGIES FOR ABSENCE

There were no apologies for absence.

5. DECLARATIONS OF INTEREST

There were no declarations of interest put forward.

6. LORDSHIP LANE PRIMARY SCHOOL - NEW NURSERY BUILDING - VARIATION OF CONSTRUCTION WORKS CONTRACT

Officers introduced the report, which was seeking agreement to increase the award of the contract with City Axis Ltd for Lordship Lane New Nursery works as allowed under Contract Standing Order (CSO) 10.2.1.b and CSO 16.02.
The increase was needed to support funding for: requirements arising from the Planning appraisal, to meet Council objectives on sustainability and to meet the market costs of rising materials.

In response to questions, the following was noted:

- City Axis was a design, build contractor, and build being undertaken was in a SIP style which brought together timber panelling in a lamination fashion. This achieved better insulation and enabled heat retention. It was reiterated that these were not panels used on housing blocks and they did not contain cladding material such as aluminium.

- A full background was provided of the close engagement and consultation with the School Head and Early Years lead on the design and build of the Nursery. This included how there had been revision to the designs following changes in management of the school. Assurance was also provided of the close involvement of a client side designer who had expertise of nursery builds.

- It was also noted that this project was particularly unique in terms of progression and cost. Also the known operational and management challenges of the school had inevitably had an impact.

RESOLVED

That pursuant to Contract Standing Order 16.02 :

To approve a variation of the construction contract for Lordship Lane New Nursery to CityAxis Ltd in the sum of £243,574.84, giving a varied contract value from £1,143,688.61 to £1,387,263.45.

To approve an increase to the contingency allowance totalling 12.5% from £114,368.86 to £173,407.93 offering a varied award value up to £1,560,671.38. The contingency will be managed under strict change control governance

Reasons for decision .

Following the appointment of CityAxis Ltd some internal design changes were requested by the Client, Haringey Schools and Learning, increasing the scope of the works, to support the developed needs of the school curriculum and community. This required re-design of the internal spaces within the new nursery building, in full collaboration with the School's senior leadership team, providing a revised package of employer's requirements to be priced by the contractor. An increase has been realised during this period on material prices which has been taken into consideration with this variation.

The Cabinet Member approval (received on 9 November 2021) to award the construction contact, was subject to receipt of planning approval, which was received on 24 January 2022. Draft planning conditions were included in the tender package for the contractor to price following some pre-planning consultation, as approval was not yet available. The issue of the planning decision with associated conditions resulted in an increase in project scope, with elements to the conditions that had not previously been allowed for (specifically related to ecology and sustainability). The full planning permission with conditions was issued to the contractor, to price the uplift and variance to deliver the full planning approval and manage its conditions.

The Children's Services Capital Programme Budget is sufficient to cover this contract increase.

Alternative Options Considered

Do nothing – a decision not to support the increase in the value of the construction works contract will result in delays in completing urgent condition and replacement works, would leave the school with inadequate facilities to meet curriculum requirements, further disruption to children's education and would risk the loss of a large portion of Salix Public Sector Decarbonisation Grant, see paragraph 6.4.

Re-tender – an option to cancel this procurement exercise and re-tender the new nursery works was considered with Strategic Procurement, Legal and Finance.

However, as the previous tenders were returned in September 2021, it is believed due to construction inflation, changes in market rates, reduction in suppliers, material shortages and increase in material costs and the impact of the war in Ukraine, that a re-tender would likely incur substantial cost increases as realised in the market over recent months. It is also believed that these increases would be higher than those being witnessed for this variation. Re-tender would substantially lengthen the delivery programme and would not meet the Salix (Public Sector Decarbonisation) Grant spend deadline, see paragraph 6.4. The extended delivery programme would also create further disruption to the school environment into their 2022-23 academic year, prolonging the impact to their external play areas. In addition, a re-tender would risk challenge from CityAxis Ltd and expose the Council to reimbursement of any costs incurred as part of the procurement exercise and notification of acceptance of their tender.

7. WEST GREEN AND BRUCE GROVE PRIMARY SCHOOLS - BUILDING SERVICES AND EXTERNAL ENVELOPE WORKS - FURTHER VARIATION OF CONSTRUCTION CONTRACT

The Cabinet Member for Early Years, Children and Families considered a report which sought approval to further vary the contract with Mulalley & This Company Ltd as allowed under Contract Standing Order (CSO) 10.2.1.b and CSO 16.02 for West Green Primary School, to allow for additional condition works to be completed at the site.

It was noted that on 16 February 2022, the Cabinet Member for Early Years, Children, and Families had also approved a variation of the construction contract for work to Bruce Grove Primary School and this report also sought approval to further vary the contract with Mulalley & Company Ltd as allowed under Contract Standing Order (CSO) 10.2.1.b and CSO 16.02 for Bruce Grove, to allow for additional condition works to be completed at the site.

It was noted that both sets of additional works still provided the Council with greater value for money by including the works within the current contract on site, as opposed to returning with a separate contract, which as a result of the current climate – construction inflation and material shortages - would likely result in inflated market rates and cause further disruption to the schools.

The variation amounts and financial details were itemised within Part B of the report as were considered commercially sensitive.

Information was provided to the Cabinet Member of the nature of the works required.

With regards to West Green Primary School, additional condition works were identified that included further building services works and the complete replacement of the hall roof, as it was in significant disrepair to its main structure. The extent of this condition could not have been identified through non-intrusive surveys and was only discovered once the works commenced and the contractor was able to fully access, open up and intrusively inspect the hall roof structure. There was a need to fund the additional costs of the redesign, build and additional time the contractor had already spent on this project.

In relation to the works at Bruce Grove Primary School, during construction and once full access to the roof was available, additional condition works were identified including replacement of roof tiles and detailing and build-up of insulation. Additional glazing works were identified on site that included unexpected difficulties in accessing windows in some

areas. These additional works had now been fully detailed and specified, with access arrangements determined and the relative scope of electrical services works revised to accommodate them. It was necessary to undertake some additional works in areas critical to the operation of the school out of hours. To accommodate these works and the resultant extended construction programme additional funding was required.

The Cabinet Member noted that the Children's Services Capital Programme Budget was sufficient to cover this contract increase.

It was further noted that, going forward, the Council's Strategic Asset Management Programme would produce a costed asset management works programme that can inform items like this.

In response to questions from the Cabinet Member, the following information was provided:

With regards to considering the difficulties from recent school build projects and taking this learning forward to forthcoming school build projects, the School's project team were completing a lessons learnt exercise. This would consider the whole schools programme of capital builds. Meetings have included the technical team. Consideration was being given to completing more intrusive surveys at the start of projects in schools. These could be completed after school hours or on a Saturday to allow identification of issues and ensure the contract amounts and contingency sums agreed were realistic.

The Cabinet Member commented that it was important to keep in mind the overall positive impact on rebuilding school buildings which was increasingly necessary to ensure that children and young people had good facilities and environment to support their learning and development. She suggested the following:

- Contacting Communications Team to publicise the positive work on updating school buildings. There was a need to celebrate that these works were happening and helping to provide children with the best start in their educational journey.

- When works were taking place at these schools, to have signs that indicated that the works were funded by Haringey Council with additional funding from the DFE.

Further to considering the exempt information, it was

RESOLVED

That pursuant to Contract Standing Order 16.02 to:

1. To note that the variation of the original contract award approved by the Cabinet Member for Early Years, Children, and Families for West Green Primary School was in the sum of £2,644,202.90.

2. To approve a further variation of the construction contract to Mulalley & Company Limited for West Green Primary School as set out in Part B.

3. To approve a variation to the contingency allowance to be managed under strict change control governance as set out in Part B.

4. To note that the variation of original contract award approved by the Cabinet Member for Early Years, Children, and Families for Bruce Grove Primary School was in the sum of £3,082,000.

5. To approve a further variation of the construction contract to Mulalley & Company Limited for Bruce Grove Primary School as set out in Part B.

6. To approve a variation to the contingency allowance to be managed under strict change control governance as set out in Part B.

Reasons for decision

West Green Primary School - During construction, additional condition works were identified that include further building services works and the complete replacement of the hall roof, as it was in significant disrepair to its main structure. The extent of this condition would not have been identified through non-intrusive surveys and was only discovered once the works commenced and the contractor was able to fully access, open up and intrusively inspect the hall roof structure. These additional roof and associated structural works have now been fully designed and specified. To accommodate these works and the resultant extended construction programme, additional funding is required. The Children's Services Capital Programme Budget is sufficient to cover this contract increase.

Bruce Grove Primary – During construction and once full access to the roof was available, additional condition works were identified including replacement of roof tiles and detailing and build-up of insulation. Additional glazing works were identified on site that included unexpected difficulties in accessing windows in some areas. These additional works have now been fully detailed and specified, with access arrangements determined and the relative scope of electrical services works revised to accommodate them. It is necessary to undertake some additional works in areas critical to the operation of the school out of hours. To accommodate these works and the resultant extended construction programme additional funding is required. The Children's Services Capital Programme Budget is sufficient to cover this contract increase.

Going forward, the Council's Strategic Asset Management Programme will produce a costed asset management works programme that can inform items like this.

Alternative Options Considered

Do nothing – a decision not to support the increase in the value of the construction works contract will result in delays in completing urgent condition works, leave the Council unable to fulfil its contractual obligations (construction contract), a school with a roof at the end of its serviceable life, a school with a roof in need of considerable repair and increase the health and safety risk of closure (in part or full site) and disruption to children's education.

Re-tender – an option to re-tender or separately tender these was considered. However, this was discounted because existing contracts are in place for both West Green and Bruce Grove with Mulalley & Company Ltd that are circa 55-65% complete. It is believed that variations provide the Council with greater value for money by including them within the current contract works on site, as opposed to returning with a separate contract, causing further disruption to the school. If tendered separately, it is believed due to construction inflation, changes in market rates, reduction in suppliers, material shortages and increase in material costs and the impact of the war in Ukraine, that tenders returned would likely incur substantial cost increases as realised in the market over recent months. It is also believed that these increases would be higher than those being witnessed for the variations. Re-tendering these works would substantially lengthen the programme, not meet the Salix (Public Sector Decarbonisation) Grant spend deadline, see paragraph 6.4 and create further disruption to the school environment into their 2022-23 academic year.

8. EXCLUSION OF THE PRESS AND PUBLIC

9. WEST GREEN AND BRUCE GROVE PRIMARY SCHOOLS - BUILDING SERVICES AND EXTERNAL ENVELOPE WORKS - FURTHER VARIATION OF CONSTRUCTION CONTRACT - EXEMPT INFORMATION

CHAIR:

Signed by Chair ……..

Date ……

MINUTES OF MEETING Cabinet Member Signing HELD ON Tuesday, 31st May, 2022, 11.30am

PRESENT:

Councillor Peray Ahmet, Leader of the Council

ALSO ATTENDING: Benita Edwards, Ayshe Simsek, Cllr Carlin

10. APOLOGIES FOR ABSENCE

None

11. DECLARATIONS OF INTEREST

None

12. COUNCIL AS OWNER OF HOMES FOR HARINGEY TO APPROVE SPECIAL RESOLUTION, NEW ARTICLES OF ASSOCIATION, MEMBER'S AGREEMENT AND APPOINTMENT OF NEW DIRECTORS - NON KEY DECISION

The Interim Head of Legal Services introduced the report, which noted that the housing management agreement with Homes for Haringey would be terminated by midnight and housing services would be insourced and delivered by the Council on the 1st of June.

The report took forward agreement of Homes for Haringey to exist in a very modified format and to fulfil ongoing management of property leases held directly by HfH and used to provide homeless accommodation.

It was noted that HfH is a company limited by guarantee and the Council is the owner and sole Member of HfH. As such, it was for the Council to authorise adoption of a new Member's Agreement, Articles of Association and appointment of new Directors so that HfH would operate from 1 June 2022 with a new remit as outlined in the report. It was clarified that the new directors were essentially Council officers with responsibilities for Housing and Finance.

The Leader further noted that since the Cabinet report was approved on 7 December 2021 to insource Homes for Haringey, there was number of legacy issues, which would need to be resolved after 1 June 2022. In order to meet this objective, the report also recommended that the Leader approved HfH's ability to continue to provide housing services to the Council as required. In addition to future-proofing HfH, the outlined recommendations also enabled HfH to continue as the counter-party to contracts with third parties, the benefit of which would be for the Council, whilst action was taken to terminate, assign or novate these contracts as required.

The Leader, acting on behalf of the Council in its role as owner and sole Member of HfH:

RESOLVED

1. To approve the Member's Agreement (Appendix C to this Report), which shall apply to HfH with effect from 1 June 2022.

2. To approve the Articles of Association (Appendix B to this Report), which shall apply to HfH with effect from 1 June 2022.

3. To appoint Robbie Erbmann, Josephine Lyseight and Judith Page as Directors of HfH with effect from 00.01am on 1 June 2022.

4. To approve the Special Resolution (Appendix A to this Report) to adopt new Articles of Association, enter the Members Agreement and appoint new Directors in accordance with Recommendations 2.2, 2.3 and 2.4.

5. To approve that with effect from 1 June 2022, the remit and objectives of HfH shall be:
   a. to provide private sector leases to the Council for the provision of short term tenancies;
   b. to provide housing services to the Council;
   c. such other matters as notified by the Council in writing.

6. To delegate authority to the Chief Executive of the Council, in consultation with the Leader and the Lead Member for Housing Services, Private Renters and Planning, to exercise the role of the Council as sole member of HfH in relation to the future appointment and / or removal of Directors of HfH.

Reasons for decision

In accordance with the decision of Cabinet on 7 December 2021, a Termination Agreement between the Council and HfH was completed on 27 May 2022. Some of the key provisions of the Termination Agreement are as follows:

i. to terminate the current Management Agreement between the Council and HfH with effect from 1 June 2022;
ii. resignation of the HfH Board of Directors at 00.01am on 1 June 2022;
iii. transfer of HfH staff to the Council at about 00.01am on 1 June 2022.

Accordingly, in order for HfH to operate as envisaged from 1 June 2022, there is a need for the Council to approve the changes set out in this report. The proposal is consistent with the decision made by Cabinet at its meeting on 7 December 2021, along with the additional legacy issues set out in paragraphs 1.3, 5.2 and 5.3 of this report. This re-structure of HfH reflects its change in purpose from an ALMO (managing the Council's housing stock) to a company holding private sector leases to

provide accommodation to homeless applicants (and such other housing services as the Council may determine).

Alternative options considered

The Council could choose to close Homes for Haringey and take over the leases it already holds

This option was rejected as this would forgo the forecasted future savings. This option would also require renegotiation with landlords to convert the existing HfH leases to Council ownership and to re-sign tenancy agreements with existing tenants.

The Council could choose to allow Homes for Haringey to continue until the current leases end but with new leases taken up by the Council

This option was rejected as although it would allow some limited savings to be maintained until the leases naturally expired, it would still lead to those savings to be lost after that date. This option would also forego future savings.

The Council could choose to allow Homes for Haringey to continue until the current leases end but with new leases taken up by a third party

This option was rejected at this time as there is not currently a viable alternative provider. However, further negotiations many lead to alternative providers in the future as Capital Letters and the Haringey Community Benefit Society evolve.

CHAIR:

Signed by Chair ……..

Date ……

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By virtue of paragraph(s) 3, 5 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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