

NOTICE OF MEETING

FULL COUNCIL

Monday, 18th July, 2022, 7.30 pm - Moselle Rooms Tottenham Town Hall , Town Hall Approach Road London N15 4RY (watch the live meeting [Here](#) and watch the recording [here](#))

Councillors: Abela, Gina Adamou (Mayor), Adje, Peray Ahmet, Ali, Amin, Arkell, Dawn Barnes, Nicola Bartlett, John Bevan, Barbara Blake, Mark Blake, Zena Brabazon, Brennan, Lester Buxton, Dana Carlin, Luke Cawley-Harrison, Seema Chandwani, Collett, Pippa Connor, Culverwell, da Costa, Lucia das Neves, Julie Davies, Diakides, Dogan, George Dunstall, Elliott, Scott Emery, Ruth Gordon, Gourtsoyannis, Makbule Gunes, Mike Hakata, Harrison-Mullane, Hymas, Ibrahim, Isilar-Gosling, Thayahlan Iyngkaran, Jameson, Adam Jogee, Johnson, Mahbub, Mason, Khaled Moyeed, Felicia Opoku, Ajda Ovat, Sheila Peacock, Reg Rice, Rossetti, Yvonne Say, Simmons-Safo, Stennett, Wallace, Elin Weston, Matt White, Sarah Williams and Alexandra Worrell

Quorum: 15

1. FILMING AT MEETINGS

Please note 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. TO RECEIVE APOLOGIES FOR ABSENCE

3. TO ASK THE MAYOR TO CONSIDER THE ADMISSION OF ANY LATE ITEMS OF BUSINESS IN ACCORDANCE WITH SECTION 100B OF THE LOCAL GOVERNMENT ACT 1972

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. TO APPROVE AS A CORRECT RECORD THE MINUTES OF THE MEETING OF THE COUNCIL HELD ON 23 MAY 2022 (PAGES 1 - 8)**
- 6. TO RECEIVE SUCH COMMUNICATIONS AS THE MAYOR MAY LAY BEFORE THE COUNCIL**
- 7. TO RECEIVE THE REPORT OF THE CHIEF EXECUTIVE**
- 8. TO RECEIVE THE REPORT OF THE MONITORING OFFICER AND HEAD OF LEGAL SERVICES**
- 9. ANNOUNCEMENT BY THE LEADER - CSO 3.1 VII (PAGES 9 - 12)**

Update on Special Urgency Decisions
- 10. TO RECEIVE REPORTS FROM THE FOLLOWING BODIES (PAGES 13 - 464)**
 - a) The Cabinet – Adoption of the North London Waste Plan
 - b) Overview and Scrutiny Committee – Annual Report
- 11. HARINGEY DEBATE : UNDERSTANDING AND TACKLING MENTAL HEALTH WELLBEING IN HARINGEY COMMUNITIES**
- 12. TO CONSIDER REQUESTS TO RECEIVE DEPUTATIONS AND/OR PETITIONS AND, IF APPROVED, TO RECEIVE THEM**
- 13. TO ANSWER QUESTIONS, IF ANY, IN ACCORDANCE WITH COUNCIL RULES OF PROCEDURE NOS. 9 & 10**

Q1 Cllr Sarah Elliott to Cllr Adam Jogee

What recent steps has the Council taken to ensure residents have the skills they need for the 21st century?

Q2 Cllr Cawley-Harrison to Cllr Ahmet

In your first meeting as Leader of the Council, you said that antisemitism has “festered” in Haringey Labour for “far too long”, and in a recent email to Labour councillors you wrote that you “will not tolerate antisemitism” in your Group. Given Haringey’s reputation, what are you doing to ensure that the council’s leadership, including all councillors, adhere to the highest standards?

Q3 Cllr Ahmed Mahbub to Cllr Seema Chandwani

Will the increase in benefits coming in April 2023 help Haringey residents who are struggling with the cost of living crisis?

Q4 Cllr Emery to Cllr Chandwani

Months after it first launched, the council’s virtual parking permit system is still not working for many residents, with people unable to purchase or renew resident or visitor CPZ permits, upload proof of address and ownership or access the online visitor parking platform. Do you agree that the council should have ironed out these flaws before rolling out the system and what is being done to fix the continuing issues?

Q5 Cllr Nicola Bartlett to Cllr Dana Carlin

Can the Cabinet member provide an update on the insourcing of Homes for Haringey?

Q6 Cllr Barnes to Cllr Carlin

When leaseholders and tenants report serious issues such as leaks in the bathroom or cracks in the ceiling to the council, what is the average time for the council to attend the property in comparison to the targeted time to respond?

14. TO CONSIDER THE FOLLOWING MOTIONS IN ACCORDANCE WITH COUNCIL RULES OF PROCEDURE NO. 13

Motion A

Cost of Living

Proposer: Councillor Dawn Barnes

Seconder: Councillor Marsha Isilar-Gosling

Council notes that:

- The UK inflation rate hit a 90 year high of 9.1 per cent in May, and is expected by the Bank of England to rise further to 11 per cent by October;
- The biggest contributor to last month’s increase in inflation was food prices, which have risen by 32.8 per cent in the past year;
- On 1 April 2022, Ofgem increased the energy price cap by 54 per cent;
- In light of the increased energy price cap, the average standard tariff energy bill will increase by £693 per year, and the average pre-pay meter energy bill will increase by £708 per year (Ofgem, 2022);

- On 6 April 2022, the government increased National Insurance by 1.25 percentage points, which is projected to cost the average family in Haringey an additional £600 a year;
- In 2021/22 Haringey Foodbanks distributed food parcels at a rate of 11 per 100,000 people (Trussell Trust, 2022);
- A 2022 survey from the Joseph Rowntree Foundation showed that 45% of all low-income families (those in the bottom 40% of household incomes) had family members either cut down on or skip meals, or go hungry because they did not have enough money for food;
- Thousands of households in Haringey live in fuel poverty, exacerbated by the fact that 60% of homes in the borough are not energy efficient (Climate Action, 2022).

Council believes that:

- The decision taken in June 2022 to agree to the policy first proposed by the Liberal Democrats, and soon supported by the Labour Party, to impose a 'Windfall Tax' on the super-profits of oil and gas companies and to redistribute this as a one-off payment of £400 to households later this year was a welcome first step from the government;
- That the government needs to take a long-term approach to lowering energy bills, including:
 - Reducing Britain's reliance on imported gas by accelerating home grown renewables;
 - Undertaking a national home insulation strategy which takes into account the private rented sector and encourages landlords to insulate properties they rent.
- The government is not going far enough to support ordinary people through the cost of living crisis.

Council resolves to:

- Declare a 'Cost of Living Emergency';
- Ask the Leader of the Council and Leader of the Opposition to write a joint letter to the Government asking them to:
 - Immediately reduce the standard rate of VAT from 20 per cent to 17.5 per cent for one year, saving the average household in Haringey a further £600 this year;
 - Immediately restore the Universal Credit supplement of £20, which was cancelled by the Government in September 2021.
- Call for a local Cost of Living Emergency Summit, with stakeholders including administration and opposition councillors, Citizens Advice, food banks, Trades Unions and Chambers of Commerce.

Motion B

Stop the bus cuts

Proposed by: Cllr Mike Hakata

Seconded by: Cllr Adam Jogee

This Council notes:

- Public transport makes up over one third of journeys in Haringey.

- Buses are the most affordable and accessible form of public transport available to Haringey residents.
- Buses are used by many local residents across Haringey to get to school, work, and to volunteer.
- That it is estimated that switching just one journey in 25 from car to bus or coach can save 2 million tonnes of CO2, and that a fully laden double-decker bus can take the place of as many as 75 cars on the road.
- Buses were responsible for only 3% of total greenhouse gas emissions by transport in the UK in 2019.
- Transport for London (TfL) is aiming for all buses in London to be zero emission by 2034, at the latest.
- TfL is one of the only major transport networks in the world that doesn't receive a central government grant, since the Central Government cut it.
- The impact of the Covid-19 pandemic on TfL's fare income and the need for Central Government support to ensure the continuation of vital public transport links in London.
- With Central Government delaying funding deals and only agreeing to short term funding, TfL is being forced to look at cutting services to balance the books.
- TfL have proposed sweeping changes to London's bus routes which will negatively impact Haringey residents.
- The Government set a number of conditions before it would provide emergency funding to enable TfL to keep operating, including requiring them to produce a plan to set out how they would achieve significant financial savings. This plan agreed by TfL with the government is for a 4% reduction on the bus network. This could mean up to 800 jobs being lost, 250 buses cut, and 16 routes axed.
- The 349 route will be cut entirely, this bus will no longer run and key (but not all) routes will be maintained by restructuring the 279 to run between Waltham Cross and Stamford Hill.
- The 259 route will be restructured to operate between Ponders End and Holloway Nag's Head, and would no longer serve stops between Kings Cross and Holloway Nag's Head.
- The 279 route will be restructured to operate between Waltham Cross station and Stamford Hill, and would no longer serve stops between Seven Sisters and Manor House station.
- The 214 route will be restructured to run between Highgate Village and Pimlico, instead of between Highgate Village and Moorgate.
- According to TfL's own impact assessment those most affected by these cuts would be 'women, older people, those on low incomes, and some Black, Asian and minority ethnic people are more likely to use buses (and many people will fall into more than one of these groups). There are also people who are more likely to be impacted by the planned changes, particularly older and disabled people as well as pregnant women and those travelling with small children'.

This Council believes:

- Bus routes should be expanded, not cut, in order to promote public transport and provide an effective and affordable alternative to car use in order to improve air quality and tackle the climate emergency.
- Access to affordable transport is essential during this cost-of-living crisis, especially considering that those on lower income, working shifts, and who have multiple jobs often rely heavily on buses.
- Londoners did the right thing and stayed at home during the pandemic, but TfL finances have been devastated as a result.
- Many local jobs are directly or indirectly reliant on bus services.
- Local businesses and high streets are reliant on our bus services, providing affordable transport for both customers and employees.
- London's transport system is crucial to the economic success of London and the government therefore has a duty to adequately fund TfL to ensure the levelling-up agenda is delivered in London.

This Council resolves:

- To work with other London Councils to call on the government to agree a long-term funding deal with TfL that would protect public transport and active travel investment.
- To ask the Leader of the Council to write to the Secretaries of State for Transport, Environment Food and Rural Affairs, and Work and Pensions expressing our concerns about impact of bus cuts on workers, those on low income, and our residents as a whole, as well as the potential environmental impact of cutting bus routes, and requesting a fair funding deal for TfL.
- Work with the Mayor of London to increase the amount of local people walking, wheeling or cycling.
- To continue to support trade unions taking action to protect workers' pensions and conditions, oppose job cuts, and call for a proper pay rise.

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George Meehan House, 294 High Road, Wood Green, N22 8JZ

Friday, 08 July 2022

MINUTES OF MEETING Full Council HELD ON Monday, 23rd May, 2022, 7.30pm

PRESENT:

Councillors: Adam Jogee (Mayor), Abela, Gina Adamou, Adje, Peray Ahmet, Dawn Barnes, John Bevan, Barbara Blake, Zena Brabazon, Dana Carlin, Luke Cawley-Harrison, Seema Chandwani, Culverwell, da Costa, Lucia das Neves, Julie Davies, Diakides, Dogan, Scott Emery, Ruth Gordon, Makbule Gunes, Mike Hakata, Ibrahim, Khaled Moyeed, Felicia Opoku, Sheila Peacock, Reg Rice, Rossetti, Yvonne Say, Elin Weston, Matt White, Sarah Williams, Ali, Arkell, Nicola Bartlett, Brennan, Lester Buxton, Collett, George Dunstall, Gourtsoyannis, Harrison-Mullane, Hymas, Thayahlan Iyngkaran, Jameson, Johnson, Mahub, Mason, Ajda Ovat, Simmons-Safo, Wallace and Alexandra Worrell

1. FILMING AT MEETINGS

The Mayor welcomed Members to the Annual Meeting of Full Council and notified attendees that it was being recorded for publication on the Council's website.

2. TO ELECT THE MAYOR FOR THE ENSUING YEAR 2022/23

Cllr Jogee, the Mayor, invited nominations for the office of the Mayor of Haringey for the municipal Year 2022- 23.

Councillor Ahmet nominated, and Councillor Brabazon seconded that Councillor Gina Adamou be elected Mayor for the forthcoming municipal year.

There being no other nominations, and further to adherence to Council Order 17.3, the Mayor duly announced Councillor Gina Adamou as Mayor for the forthcoming municipal year.

RESOLVED

1. That Councillor Gina Adamou be elected Mayor for the Municipal Year 2022/23
2. The Mayor made and signed the Declaration of Acceptance of Office, which was witnessed by Councillors Ahmet and Brabazon.
3. The Mayor then addressed the Council, reflected on her experiences in Haringey, gave thanks for her election and outlined her objectives for her year of office.

4. The Mayor's Consorts Andreas Adamides and Jonathan Vellapah were invested with a Badge of Office.

3. TO RECEIVE APOLOGIES FOR ABSENCE

Apologies for absence were noted from:

Councillor Elliott
Councillor M Blake
Councillor Stennett
Councillor Isilar – Gosling
Councillor Connor
Councillor Amin

Apologies for lateness from Councillor Adje.

4. TO ASK THE MAYOR TO CONSIDER THE ADMISSION OF ANY LATE ITEMS OF BUSINESS IN ACCORDANCE WITH SECTION 100B OF THE LOCAL GOVERNMENT ACT 1972

The Chief Executive asked the Mayor to agree the admission of the following late items of business that could not be available earlier, and needed to be dealt with at this meeting.

Item 11 – Appointments made by the political groups
Item 12 - Appointments of Committees for the Municipal Year 2022/23; and
Item 13: Appointments to outside bodies 2022/23:
Item 14 – Approval of Council Calendar of meetings 2022/23
Item 16: End of the year financial statement 2021/22 of allowances paid to Members
Item 17 Attendance of councillors at meetings for 2021/22

The first three reports outlined, were not available at the time of dispatch as they included recent changes following party group meetings and the final three report outlined required verification of information.

5. DECLARATIONS OF INTEREST

There were no declarations of interest.

6. TO RECEIVE WRITTEN NOTIFICATION OF THE APPOINTMENT OF DEPUTY MAYOR

The Chief Executive reported that the Mayor had signified in writing the appointment of Councillor Lester Buxton as Deputy Mayor for the Municipal Year 2022/23.

Councillor Buxton was invested with his Badge of Office.

The Mayor announced that the Deputy Mayor's Consort would be Alexander Ritchie who was then invested with the Badge of Office.

7. TO APPROVE AS A CORRECT RECORD THE MINUTES OF THE MEETING OF THE COUNCIL HELD ON 14TH OF MARCH 2022 AND 27TH OF APRIL 2022

RESOLVED

To approve the minutes of the Full Council meeting held on the 14th of March, adding Cllr Julie Davies apologies for the meeting.

To approve the minutes of the Full Council meeting held on the 27th of April 2022.

8. TO PASS A VOTE OF THANKS TO THE RETIRING MAYOR AND MAYOR'S CONSORTS ,AND THE RETIRING DEPUTY MAYOR AND DEPUTY MAYOR'S CONSORTS

A vote of thanks to the retiring Mayor, Deputy Mayor and Consorts was moved by Councillor Ahmet and seconded by Councillor Cawley – Harrison.

The retiring Mayor was presented with a badge and a framed collage in honour of his 2 municipal years of office. He addressed the meeting, thanking the Council for the honour of being Mayor. He thanked officers and residents that had supported him in his Mayoral years, outlining the past difficult two years of the pandemic for the borough, country and the world. His mayoralty had started with meetings online and no vaccine and were now ending with a vaccine that has been rolled out to communities and social distancing measures lifted with meetings in person.

He thanked the Council, partners, businesses, community groups and schools for all their efforts in supporting residents through the last couple of difficult years and hoped they could all continue working together to make Haringey even better.

There was special mention made of the outgoing Mayor's charities Pram Depot and The Friends of Hornsey Church Tower whom he hoped that Councillors would continue to support in their work for the community.

RESOLVED

That the Council extend its thanks and appreciation to the retiring Mayor, Adam Jogee, and his consorts Alison Lawther and Haroon Jogee for the services they had rendered to the Borough during the past municipal year.

9. TO RECEIVE SUCH COMMUNICATIONS AS THE MAYOR MAY LAY BEFORE THE COUNCIL

The Mayor announced her focus, for the forthcoming year ,would be on Mental Health. Her charity for the coming year, was MIND in Haringey. Mental Health would be a prominent issue as the country moved forward out of the pandemic. She noted that there had been some stark experiences of the pandemic for residents and there would be differing mental health challenges for the residents in the borough as a result of this with the need for support and services.

Information on the Mayor's chosen charity would be included on the Council mayoral webpages.

10. TO ELECT THE LEADER OF THE COUNCIL FOR FOUR CONSECUTIVE MUNICIPAL YEARS

Councillor Williams proposed that Councillor Peray Ahmet be elected Leader of the Council for 2022 - 2026, which was seconded by Councillor Ovat.

There being no other nominations received, the Mayor called a vote on the proposal. With 45 Members voting in favour, and 5 abstaining, it was agreed that Councillor Peray Ahmet be elected Leader.

The Leader of the Council then gave an address to the Council, setting out her aspirations for her term of office. This was responded to by Councillor Cawley-Harrison, after which Councillor Ahmet had opportunity to address the points made by Councillor Cawley- Harrison.

11. TO RECEIVE THE REPORT OF THE CHIEF EXECUTIVE, NOTING THE APPOINTMENTS MADE BY THE POLITICAL GROUPS, AND TO TAKE SUCH ACTION AS MAY BE APPROPRIATE

The Mayor had agreed to the admittance of this item as a late report, given that it set out decisions that had been made recently at party meetings.

Councillor Weston, as Chief Whip, introduced the paper that outlined appointments made by Political Groups in their recent annual meetings.

RESOLVED

That the constitution of the political groups be noted:

The Labour Group

Leader:	Councillor Ahmet
Deputy Leader:	Councillor Hakata
Chief Whip:	Councillor Weston
Chair:	Councillor Bartlett
Vice Chair:	Councillor Abela
Secretary:	Councillor Arkell
Assistant Whips:	Councillors , Ali, Dogan, Say
Group Treasurer	Councillor Dunstall
Non-Executive members	Councillors Culverwell, B. Blake

Councillors

Adamou
Adje
Amin

Bevan
M Blake
Brabazon
Brennan
Buxton
Carlin
Chandwani
Collett
das Neves
Davies
Diakides
Elliott
Gordon
Gourtsyannis
Gunes
Harrison – Mullane
Hymas
Ibrahim
Iyngkaran
Jameson
Jogee
Johnson
Mahbub
Mason
Moyeed
Opoku
Ovat
Peacock
Rice
Simmons- Safo
Stennett
Wallace
White
Williams
Worrell

The Liberal Democrat Group

Leader:	Councillor Cawley- Harrison
Deputy Leader:	Councillor Barnes
Chief Whip:	Councillor Emery
Deputy Whip:	Councillor Rossetti

Councillors:

Cllr Connor
Cllr da Costa
Cllr Isilar-Gosling

12. TO AGREE THE APPOINTMENTS PROCEDURE AND TO APPOINT COMMITTEES AND OTHER BODIES FOR THE MUNICIPAL YEAR 2022/23, INCLUDING THE SELECTION OF THE CHAIRS AND VICE CHAIRS

The Mayor had agreed to the admittance of this item as a late report, given that it set out decisions that had been made recently at party meetings.

The Chief Whip moved recommendation 1, as detailed in the circulated report and this was agreed.

The Chief Whip moved recommendation 2, as detailed in the circulated report and this was agreed.

Councillor Barnes moved an amendment to Recommendation 3, seconded by Councillor Emery,

as follows: -

“Agree the membership of Committees and the appointment of Chairs as detailed at Appendix 1 subject to Cllr Connor being made the Chair of Overview and Scrutiny Committee.”

Councillor Weston responded to the amendment.

Cllr Barnes continued to speak in favour of the amendment and Cllr Emery spoke in support of the amendment.

A vote was taken on the amendment to Recommendation 3, as follows:

5 in FAVOUR,

45 AGAINST

NO abstentions

The amendment was lost. On a vote on the original motion, this was agreed.

The Chief Whip moved recommendation 4, as detailed in the circulated report and this was agreed.

RESOLVED

1. To appoint to the Committees on the "slate" basis.
2. To agree the allocation of seats on Committees and appointments in accordance with paragraphs 4.1 to 4.6.
3. To agree the membership of Committees and the appointment of Chairs as detailed at Appendix 1 giving effect to the wishes of the political groups.

4. To note the proposed membership of the Cabinet as detailed at Appendix 2 appointed by the Leader in accordance with Article 7 paragraph 7.05 ii of the Council Constitution.

13. TO MAKE APPOINTMENTS TO OUTSIDE BODIES

The Mayor agreed to the admittance of this item as tabled, given that it set out decisions that had been made recently at party meetings.

The Chief Whip moved the report, as tabled.

RESOLVED

1. To note the appointments to the Partnership and Association bodies which mainly exercise 'executive' functions set out at Appendix 1 and in accordance with article 10.8b(i)
2. To approve the appointments to the remainder of outside bodies set out at Appendix 1.

14. TO RECEIVE THE REPORT OF THE CHIEF EXECUTIVE

RESOLVED

To agree the attached schedule of meetings for 2022/23.

Reasons for decision

The early notification of the schedule of meetings for 2022/23 will allow for the effective planning of meetings and in turn decision making of the council.

Publication of forth coming committee meeting dates will further support residents, stakeholders and partners participation in council decision making.

Alternative options considered

The alternative was not to publish the council schedule of meetings which would not be keeping with transparency and openness objectives of the council.

15. TO RECEIVE THE REPORT OF THE MONITORING OFFICER AND HEAD OF LEGAL SERVICES

There were no matters to report on.

16. **TO RECEIVE A STATEMENT OF COUNCILLORS' ATTENDANCE AT MEETINGS OF THE COUNCIL, COMMITTEES, AND SUB COMMITTEES IN ACCORDANCE WITH COUNCIL PROCEDURE RULES**

RESOLVED

That the statement of attendance, as attached, be noted.

17. **TO NOTE THE END OF MUNICIPAL YEAR FINANCIAL STATEMENT FOR 2021/22**

RESOLVED

That the allowances paid to each Member, as set out at Appendix 1, be noted.

CHAIR:

Signed by Chair

Date

Report for: Full Council – 18 July 2022

Title: **Leader’s Report on Special Urgency Decisions**

Authorised by: Fiona Alderman Head of Legal and Governance & Monitoring Officer

Lead Officer: Ayshe Simsek, Democratic Services and Scrutiny Manager
0208 489 2929 ayshe.simsek@haringey.gov.uk

Ward(s) affected: All

**Report for Key/
Non Key Decision:** Non Key Decision

1. Describe the issue under consideration

1.1 This report sets out the decisions taken under the Council’s Urgency Procedure which are required to be reported to Council on an annual basis.

2. Cabinet Member Introduction

N/A

3. Recommendations

3.1 Council is asked to:

Note the decisions taken under the Council’s Special Urgency Procedure.

4. Background information

4.1 Part 4 Section D, Paragraph 19.3 of the Council Constitution advises that the Leader submit a report to the Council at least annually on the Cabinet decisions taken in the circumstances set out in rule 17(special urgency) during the period since the last report was submitted to Council. The report will include the number of decisions so taken and a summary of the matters in respect of which those decisions were taken.

Date	Report title	Report Recommendations
13.07.2021	Extension of the Rough Sleeping Discretion Policy	<p>Approves the Rough Sleeping Discretion Policy attached at Appendix 1, as agreed in September 2020.</p> <p>ii. Extends the period of application of the Rough Sleeping Discretion Policy to 19 August 2021 unless terminated earlier or extended beyond this date by Cabinet / Cabinet Member decision.</p> <p>iii. Notes that following termination of the Rough Sleeping Discretion Policy some of those placed in emergency accommodation under the policy will remain there pending placement in move-on accommodation pursuant to the Exit Strategy at Appendix 2.</p> <p>iv. Delegates authority to the Director of Housing, Regeneration and Planning, in consultation with the Cabinet Member for Planning, Licensing and Housing Services, to amend this policy to give effect to changes in legislation or statutory guidance, or directives or requests of a similar character issued by Government.</p>

14.07.2021	COVID Additional Winter Grant Scheme in Haringey	<p>1. To approve the additional funding allocation from the Government.</p> <p>2. To approve the Covid Local Support Grant/ Winter Grant 4: June 2021 Scheme Policy which sets out the Council's arrangement for administering the additional funding and is attached at Appendix 1 to the report.</p> <p>3. To delegate authority to the Assistant Director Commissioning, in consultation with the Director of Children Services and the Cabinet Member for Children, Education and Families, 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.</p> <p>4. To agree that this policy is subject to the availability of government funding and will terminate on 30 September 2021 unless terminated earlier or extended beyond this date by Cabinet or Cabinet Member decision.</p>
12 October 2021	Brownfield Land Release Fund Grant Funding Agreement	<p>To approve the acceptance by the Director of Finance of the receipt from the Ministry of Housing, Communities and Local Government (MHCLG) of £3,866,214.00 in capital funding through the Brownfield Land Release Fund to pay for infrastructure works, including decontamination, utilities works and associated infrastructure provision, at the Ashley Road Depot site and at Gourley Triangle.</p> <p>To approve that the grant sum is added to the Housing Revenue Account (HRA) Budget.</p>
18 October 2021	Household Support Grant	<p>To approve the additional funding allocation from the Government.</p> <p>To approve the Household Support Fund Scheme Policy: October 2021 which sets out the Council's arrangement for administering part of the additional funding and is attached at Appendix 1 of the report.</p> <p>To delegate authority to the Assistant Director Commissioning, in consultation with the Director of Children Services and 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.</p> <p>To agree that this policy is subject to the availability of government funding and will terminate on 31 March 2022 unless terminated earlier or extended beyond this date by Cabinet or Cabinet Member decision</p>
17 November 2021	Household Support Grant	<p>To approve the additional funding allocation from the Government in the sum of around £1.4 million to support low-income families and residents most in need and in financial hardship and to be delivered through the Council and partners.</p> <p>To approve the updated Household Support Fund Scheme Policy [November 2021] at Appendix 1 of the report, which sets out the Council's allocations and arrangement for administering the funding provided by the government.</p> <p>To delegate authority to the Assistant Director for Finance, 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 the government.</p> <p>To agree that this policy is subject to the availability of government funding and will terminate on 31 March 2022 unless terminated earlier or extended beyond this date by Cabinet or Cabinet Member decision.</p>
20 December 2021	Disabled Residential Parking Permit	To approve the proposal to extend the concessions of the disabled virtual residential parking permit, as detailed in Table 1 in paragraph 6.4 of the report.
24 January 2022	Amendments to S47 Discretionary rate Relief policy in Respect of the COVID Additional Relief Fund	<p>To approve the Covid Additional Relief Fund (CARF) Discretionary Rate Relief scheme set out in Appendix 1 of the report.</p> <p>To delegate authority to the Director of Housing, Regeneration, and Planning, after consultation with the Cabinet Member for House Building, Place-Making, and Development to amend the levels of relief awarded, as set out in Appendix 1 to the report, to review the levels of the award of relief once take-up levels of the relief are known so as to maximise the distribution of the</p>

		<p>Covid Additional Relief Fund (CARF) funding without overspending the Government's funding for this scheme.</p> <p>To agree that awards of this additional discretionary rate relief are subject to the availability of Government funding for Covid Additional Relief Fund (CARF) and that the scheme is available for the financial year 2021/22 only.</p>
18 March 2022	Call-Off Agreements for the provision of Highways and Transport Consultancy Services	<p>To approve the Council entering into three individual non-binding call-off agreements with the following service providers:</p> <ol style="list-style-type: none"> 1. Project Centre Ltd 2. Gutteridge, Haskins and Davey Ltd, and 3. WSP UK Ltd <p>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.</p>
31 March 2022	Section 75 NHS ACT 2006 Health and Social care lead Commissioning and Pooled funds Partnership Agreement between the Council and NCL CCG	<p>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.</p> <p>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 schedules to the S.75 Partnership Agreement between the Council and the CCG</p>

5. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities) Finance and Procurement

5.1 There are no financial implications as this is a noting report.

Assistant Director Corporate Governance & Monitoring Officer

5.2 The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England Regulations 2012) requires local authorities to consider an annual report detailing each executive decision where the making of the decision was agreed as special urgency.

6. Use of Appendices

None

7. Local Government (Access to Information) Act 1985

7.1 Background documents:

Link to urgent decisions is as follows:

<https://www.minutes.haringey.gov.uk/ieListMeetings.aspx?CIId=773&Year=0>

<https://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CIId=435&MIId=9521&Ver=4>

- 7.2 The background papers are located at River Park House, 225 High Road, Wood Green, London N22 8HQ.
- 7.3 To inspect them or to discuss this report further, please contact Ayshe Simsek on 0208 489 2929.

REPORT OF CABINET 1/2022/23**FULL COUNCIL 18 July 2022****Chair : Cllr Peray Ahmet****To be introduced by Cllr Dana Carlin Cabinet Member for Housing Services, Private Renters, and Planning****1.INTRODUCTION**

Full Council approval is required of the North London Waste Plan as set out as set out at Part Three Section B - Section 1 - Full Council Responsibilities section 2 a (iv).

The North London Waste Plan has been considered by the Strategic Planning Committee on the 14th of June 2022 and endorsed its adoption by full Council . The attached report and its appendices were also considered by the Cabinet on the 21 June 2022 and recommended for full Council adoption.

2.NORTH LONDON WASTE PLAN

The NLWP had been subject to an Examination in Public by an independent Planning Inspector and had been found sound, subject to Main Modifications.

We noted that the development of the NLWP had been a long process with considerable community engagement that had resulted in a number of modifications. It was noted that three priority areas had been identified in the NLWP: Friern Barnet Sewage Works/ Pinkham Way, Brantwood Road, and North East Tottenham. It was clarified that the authority did not own these sites and it was noted that there were multiple site owners.

We noted that paragraph 5.26 of the Cabinet report had contained a factual error in relation to the Pinkham Way site. It was clarified that Barnet Council had not put forward the site as suitable for waste management. We further noted that this position was reflected in Appendix C to the report which demonstrated that, due to issues of multiple ownership, only one small area of the site owned by the North London Waste Authority (NLWA) was likely to be deliverable for waste management. We thanked the Pinkham Way Alliance for raising this issue.

We noted that the NLWP was last agreed by Cabinet in 2019. Following this, the independent Planning Inspector had examined the NLWP and had commented that it should demarcate more clearly where development could take place and that there should be additional arrangements for biodiversity. We considered that these issues had been addressed in the NLWP and corresponding appendices.

In response to questions at the Cabinet meeting, we noted the following information:

The Brantwood Road site was situated close to a residential area and it was explained that, because of the restrictions on the residential road, any vehicles would have to

access the site from the east and this would not impact the residential road. It was added that this was a large site and that any waste facility was unlikely to fill the entire site; in addition, it would be recommended that any facility avoided close proximity to residential areas.

In relation to the Brantwood Road site, that nothing in the NLWP would preclude the provision of solar, wind, or other sustainable energy. It was highlighted that any proposals would be subject to pre-application engagement with the community and the usual planning policy requirements.

That the NLWP had identified sites but that there was no guarantee that facilities would be brought forward in all of the locations. It was added that the NLWP would be subject to ongoing monitoring.

If sites in the NLWP were brought forward, members noted the importance of ensuring that resident engagement and communications were delivered in an accessible format.

That only a small section of the Pinkham Way was considered to be suitable for a waste facility and it was enquired why the NLWP identified the whole site. It was explained that the NLWP had identified the whole site as the Council did not want to pre-empt the best design of the site. It was added that the site had some clear constraints that any proposal would need to manage, including flooding risk, biodiversity, land ownership, and proximity to residential areas.

The NLWP did not affect or consider whether the Edmonton incinerator would be progressed. It was explained that the NLWP concerned site planning for waste.

Further to considering the report, we considered the comments of Strategic Planning Committee and who endorsed the North London Waste Plan.

WE RECOMMEND

That Full Council:

- 1) Note the content of the attached report and the Inspector's Report on the North London Waste Plan (set out in Appendix A);
- 2) Agree to adopt the North London Waste Plan (Appendix C) including Main Modifications (Appendix B) and associated changes to the Policies Map.

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:
- Make use of existing sites
 - Seek a better geographical spread of waste sites across North London, consistent with the principles of sustainable development
 - Encourage co-location of facilities and complementary activities
 - Provide opportunities for decentralised heat and energy networks
 - Protect local amenity
 - 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

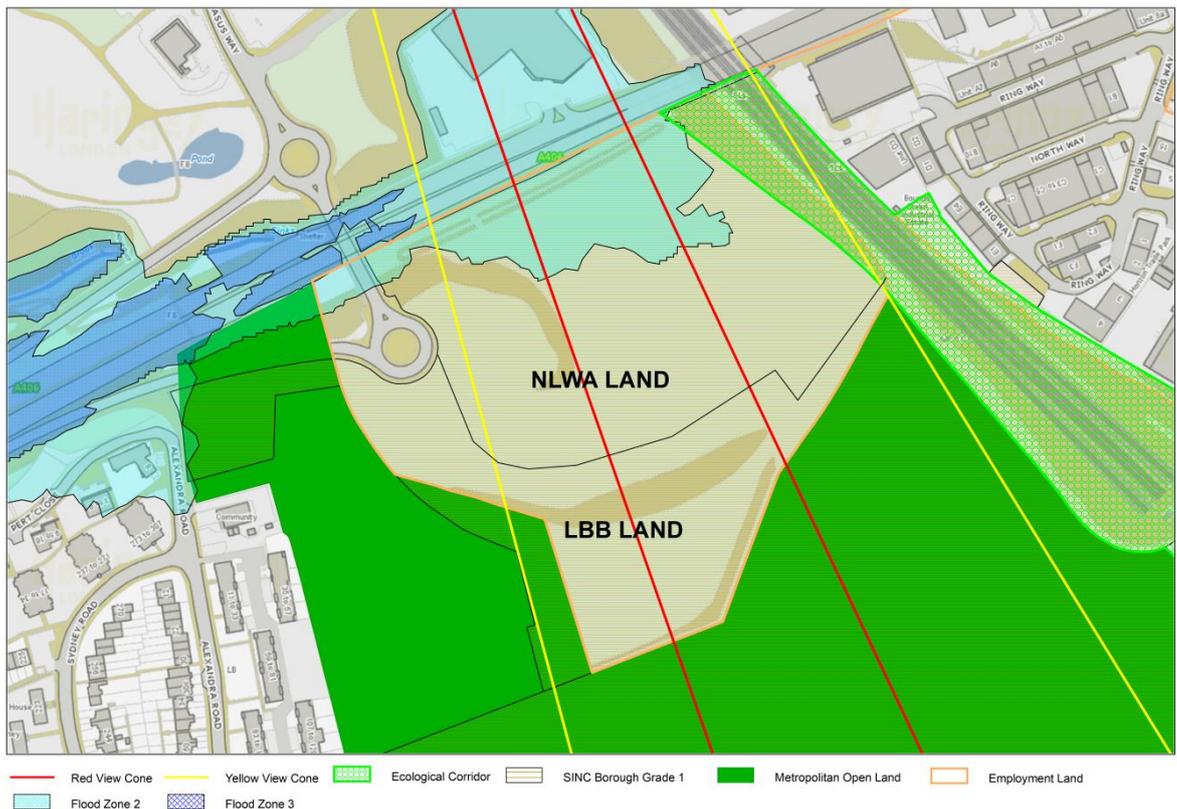
Priority Areas in Haringey

- 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. **MMS** 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 managed 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 underlining 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)	<p>The Aim and Strategic Objectives:</p> <p>[...]</p> <p>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.</p>
MM2	18	Paragraph 3.3	<p>Aim of the NLWP</p> <p>“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”.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>* 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.</p>
MM3	18	Paragraph 3.4	<p>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:</p> <p>[...]</p> <p>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 cooperate. Met through Policies 1, 2, 3, 4, and 8</p> <p>[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.</p>
MM4	15	2.27 [Moved here after 2.25]	<p>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</p>

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 provides 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 guides the assessment of the suitability of windfall sites under Policy 3. It They reflects 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	<p>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.</p>
MM8	22	4.12	<p>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).</p> <p>[separate here to new para]</p> <p>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.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>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, 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 8.</p>
MM9	25	New after 4.17	<p>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.</p>
MM10	27	4.18	<p>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.</p>
MM11	28	4.26	<p>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</p>

Ref	Page	Policy/ Paragraph	Main Modification												
			<p>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.</p> <p>Access to transport networks including sustainable transport modes was considered when assessing the suitability of new sites and areas. Rail and water road transport is particularly desirable when waste is travelling long distances. Policy 5 considers sustainable transport modes in planning decisions.</p>												
MM12	29	New after 5.3	<p>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.</p>												
MM13	30	New after Fig 8	<p>How North London's waste is currently managed</p> <p>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.</p>												
MM14	37	Revised Table 4	<p>Revised Table 4 : The amount of North London's waste managed in North London and elsewhere (2016) Waste recorded as exported from North London to landfill 2011-2016</p> <table border="1"> <thead> <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> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	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						
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										

Ref	Page	Policy/ Paragraph	Main Modification					
			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%
MM15	39	5.29 [moved here after 5.8]	<p>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.</p>					
MM16	37	5.27	<p>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</p>					

Ref	Page	Policy/ Paragraph	Main Modification
			<p>(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.</p>
MM17	37	New [after 5.27]	<p>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.</p> <p>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.</p> <p>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.</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM18	39	5.32	<p>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.</p> <p>[Moved from 5.31]</p> <p>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.</p> <p>[Moved from 7.6]</p> <p>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.</p>
MM19	41	6.3 and Table 5	Targets for North London's waste management managed within North London

Ref	Page	Policy/ Paragraph	Main Modification																					
		renumbered Table 3	<p>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:</p> <p>Table 35: Recycling and Recovery Targets with 2016 Baseline</p> <table border="1"> <thead> <tr> <th>Waste Stream</th> <th>Target</th> <th>2016 baseline</th> </tr> </thead> <tbody> <tr> <td>LACW</td> <td>50% recycling for LACW by 2025 (€ Contributing towards 65% recycling of municipal waste by 2030)</td> <td>279%</td> </tr> <tr> <td>C&I</td> <td>75% recycling by 2030 (€ Contributing towards 65% recycling of municipal waste by 2030)</td> <td>4452%</td> </tr> <tr> <td>C&D</td> <td>95% reuse/recycling/recovery by 2020</td> <td>9350-60%</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> </tbody> </table>	Waste Stream	Target	2016 baseline	LACW	50% recycling for LACW by 2025 (€ Contributing towards 65% recycling of municipal waste by 2030)	279%	C&I	75% recycling by 2030 (€ Contributing towards 65% recycling of municipal waste by 2030)	4452%	C&D	95% reuse/recycling/recovery by 2020	9350-60%	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
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MM20	34	5.13	<p>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</p>																					

Ref	Page	Policy/ Paragraph	Main Modification
			<p>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.</p>
MM21	36	5.21	<p>[Part of 5.21 moved here]</p> <p>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.</p>
MM22	41	6.4 (part)	<p>Options for managing modelling North London’s future waste arisings</p> <p>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</p>

Ref	Page	Policy/ Paragraph	Main Modification																		
			<p>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).</p> <p>[Moved down to after new Table 5]</p> <p>[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.]</p>																		
MM23	41	New Table after 6.4	<p>Table 4: Options considered for forecasting North London’s waste arisings and need</p> <table border="1" data-bbox="658 1177 2123 1366"> <thead> <tr> <th data-bbox="658 1177 927 1219">LACW</th> <th data-bbox="927 1177 1191 1219">C&I</th> <th data-bbox="1191 1177 1417 1219">C&D</th> <th data-bbox="1417 1177 1682 1219">Excavation</th> <th data-bbox="1682 1177 1908 1219">Hazardous</th> <th data-bbox="1908 1177 2123 1219">Agricultural</th> </tr> </thead> <tbody> <tr> <td colspan="6" data-bbox="658 1219 2123 1260" style="text-align: center;">Capacity options</td> </tr> <tr> <td data-bbox="658 1260 927 1366">Meeting the London Plan apportionment</td> <td data-bbox="927 1260 1191 1366">Meeting the London Plan apportionment</td> <td data-bbox="1191 1260 1417 1366">Baseline (no change)</td> <td data-bbox="1417 1260 1682 1366">Baseline (no change)</td> <td data-bbox="1682 1260 1908 1366">Baseline (no change)</td> <td data-bbox="1908 1260 2123 1366">Baseline (no change)</td> </tr> </tbody> </table>	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)
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)																

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]	<p>Further details of these options is available in NLWP Data Study 2. An Options Appraisal Report (20198) 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.</p>					
MM25	42	New below 6.6	<p>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</p>					

Ref	Page	Policy/ Paragraph	Main Modification
			<p>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.</p> <p>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.</p> <p>[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.</p>

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MM26	48	Table 8 renumbered Table 5 [revised and moved here]	<p>Table 5: Projected arisings and management of North London's waste 2020-2035</p> <table border="1"> <thead> <tr> <th>Waste Stream</th> <th>Facility Type</th> <th>2020</th> <th>2025</th> <th>2030</th> <th>2035</th> </tr> </thead> <tbody> <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> </tbody> </table>	Waste Stream	Facility Type	2020	2025	2030	2035	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
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Ref	Page	Policy/ Paragraph	Main Modification					
			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
MM27	30	5.5 [Moved here after Table 8]	<p>Existing capacity</p> <p>Table 63 below summarises shows the existing (20168) capacity of North London's waste management facilities in North London by type of facility and waste stream managed and changes in available capacity at known dates when facilities come on stream/close. It identifies an existing waste management capacity of around 4.4 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 reducing to around 3.8 million tonnes by 2029 as a result of known closure of some existing sites up to 2028. Figure 59 shows the location of the facilities represented in Table 63 and a full list is in Appendix 1.</p>					

Ref	Page	Policy/ Paragraph	Main Modification																					
MM28	31	Table 3 renumbered Table 6 [Revised and moved here after 5.5]	<p>Table 63: Maximum Existing Annual Capacity at Licensed Operational Waste Management Facilities at the Start of the Plan Period and a key dates following changes in sites capacities</p> <table border="1" data-bbox="660 336 2063 740"> <thead> <tr> <th data-bbox="660 336 739 395"></th> <th data-bbox="739 336 1288 395">Type of capacity</th> <th data-bbox="1288 336 1588 395">Waste stream</th> <th data-bbox="1588 336 2063 395">Existing capacity (2016)</th> </tr> </thead> <tbody> <tr> <td data-bbox="660 395 739 740" rowspan="6" style="writing-mode: vertical-rl; transform: rotate(180deg);">Management</td> <td data-bbox="739 395 1288 504" rowspan="3">Recycling/Composting/Treatment</td> <td data-bbox="1288 395 1588 445">LACW / C&I</td> <td data-bbox="1588 395 2063 445">1,062,424</td> </tr> <tr> <td data-bbox="1288 445 1588 504">CD&E</td> <td data-bbox="1588 445 2063 504">663,436</td> </tr> <tr> <td data-bbox="1288 504 1588 563">Hazardous</td> <td data-bbox="1588 504 2063 563">4,252</td> </tr> <tr> <td data-bbox="739 563 1288 619">Energy Recovery</td> <td data-bbox="1288 563 1588 619">LACW / C&I</td> <td data-bbox="1588 563 2063 619">597,134</td> </tr> <tr> <td data-bbox="739 619 1288 675">Transfer</td> <td data-bbox="1288 619 1588 675">All</td> <td data-bbox="1588 619 2063 675">1,225,068</td> </tr> <tr> <td data-bbox="739 675 1288 740">Landfill</td> <td data-bbox="1288 675 1588 740">All</td> <td data-bbox="1588 675 2063 740">0</td> </tr> </tbody> </table> <p data-bbox="660 786 2063 820">Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2012-2016</p>		Type of capacity	Waste stream	Existing capacity (2016)	Management	Recycling/Composting/Treatment	LACW / C&I	1,062,424	CD&E	663,436	Hazardous	4,252	Energy Recovery	LACW / C&I	597,134	Transfer	All	1,225,068	Landfill	All	0
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MM29	32	5.6 [Moved here]	<p>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. 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</p>																					

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	<p>Changes to Capacity over the Plan Period</p> <p>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.</p>
MM31	55	8.5 Moved here	<p>Edmonton EcoPark</p> <p>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.</p>
MM32	55	8.6 Moved here	<p>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.</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM33	56	8.10 Moved here	<p>Powerday</p> <p>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.</p> <p>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.</p>
MM34	56	8.11 Moved here	<p>Loss and re-provision of existing waste management facilities</p> <p>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.</p>
MM35	56	8.12 Moved here	<p>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</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>(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.</p>
MM36	56	New para after repositioned 8.12	<p>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.</p>
MM37	42	6.7	<p>Meeting the Capacity Gap</p> <p>The capacity gap is the difference between projected waste arisings (Table 5) and existing capacity (Table 6). Table 7 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</p>

Ref	Page	Policy/ Paragraph	Main Modification																																								
			<p>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.</p>																																								
MM38	43	Table 6 renumbered Table 7	<p>[Revised]</p> <p>Table 76: Capacity gaps throughout the Plan period (tonnes) –chosen option</p> <table border="1"> <thead> <tr> <th>LACW/C&I</th> <th>2020</th> <th>2025</th> <th>2030</th> <th>2035</th> </tr> </thead> <tbody> <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>35,200</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> </tbody> </table> <table border="1"> <thead> <tr> <th>C&D</th> <th>2020</th> <th>2025</th> <th>2030</th> <th>2035</th> </tr> </thead> <tbody> <tr> <td>Projections</td> <td>457,796</td> <td>457,746</td> <td>496,480</td> <td>517,032</td> </tr> </tbody> </table>	LACW/C&I	2020	2025	2030	2035	Projections	7,774,481	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	2035	Projections	457,796	457,746	496,480	517,032
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Ref	Page	Policy/ Paragraph	Main Modification				
			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	2035
			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
MM39	43	New para after Revised Table 6, now Table 7	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).				
MM40	43	6.8	<p>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 (20198) 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</p>				

Ref	Page	Policy/ Paragraph	Main Modification																						
			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.																						
MM41	44	New Table numbered Table 8	<p>Table 8: Reference Capacities for Land Take for New Waste Facilities</p> <table border="1" data-bbox="741 464 1664 1034"> <thead> <tr> <th data-bbox="741 464 1344 544">Facility Type</th> <th data-bbox="1344 464 1664 544">Assumed tonnes per hectare</th> </tr> </thead> <tbody> <tr> <td data-bbox="741 544 1344 587">Energy from waste (large scale)</td> <td data-bbox="1344 544 1664 587">165,000</td> </tr> <tr> <td data-bbox="741 587 1344 630">Energy from waste (small scale)</td> <td data-bbox="1344 587 1664 630">50,000</td> </tr> <tr> <td data-bbox="741 630 1344 673">Recycling (C+I & LACW)</td> <td data-bbox="1344 630 1664 673">128,000</td> </tr> <tr> <td data-bbox="741 673 1344 716">Recycling (C+D)</td> <td data-bbox="1344 673 1664 716">100,000</td> </tr> <tr> <td data-bbox="741 716 1344 807">Recycling (specialised – eg. Metals)</td> <td data-bbox="1344 716 1664 807">50,000</td> </tr> <tr> <td data-bbox="741 807 1344 850">Recycling (Hazardous)</td> <td data-bbox="1344 807 1664 850">10,000</td> </tr> <tr> <td data-bbox="741 850 1344 893">Re-use</td> <td data-bbox="1344 850 1664 893">15,000</td> </tr> <tr> <td data-bbox="741 893 1344 936">Composting</td> <td data-bbox="1344 893 1664 936">25,000</td> </tr> <tr> <td data-bbox="741 936 1344 979">Treatment Plant</td> <td data-bbox="1344 936 1664 979">50,000</td> </tr> <tr> <td data-bbox="741 979 1344 1023">Treatment Plant (Hazardous)</td> <td data-bbox="1344 979 1664 1023">10,000</td> </tr> </tbody> </table>	Facility Type	Assumed tonnes per hectare	Energy from waste (large scale)	165,000	Energy from waste (small scale)	50,000	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
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MM42	45	Table 7 revised and renumbered Table 9	<p>[Table 7 revised]</p> <p>Table 79: 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)</p>																						

Ref	Page	Policy/ Paragraph	Main Modification		
			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
MM43	45	6.10	<p>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.</p>		
MM44	54	New paragraphs after 8.1	<p>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).</p> <p>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.</p>		

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			<p>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.</p> <p>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.</p> <p>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.</p>
MM45	54	8.2 [Restructured]	<p>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 plots 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.</p>

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MM46	57	8.20	<p>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.</p> <p>[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.</p>
MM47	58	8.21	<p>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:</p> <p>[...]</p> <p>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</p>

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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	<p>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:</p> <ul style="list-style-type: none"> • 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	<p>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.</p> <p>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,</p>

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			<p>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.</p>
MM50	61	8.25 [restructured and split]	<p>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).</p> <p>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</p>

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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	<p>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.</p> <p>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.</p> <p>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</p>

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			<p>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.</p> <p>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.</p> <p>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</p>

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			<p>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.</p>
MM52	61	8.26	<p>The Priority Areas areas, shown in Figure 13 (see also Schedules 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.</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM53	63	Figure 10	<p>Figure 110: Priority Areas for new waste management facilities Location of proposed new areas</p> <p>Key Priority Areas for New Waste Management Facilities</p> <p>Priority Areas</p> <p>Barnet A02-BA - Oakleigh Road A03-BA - Brunswick Industrial Park A04-BA - Mill Hill Industrial Estate A05-BA - Connaught Business Centre</p> <p>Enfield A12-EN - Eley's Estate</p> <p>Hackney A15-HC - Millfields LSIS LLDC1-HC - Barlp Street LSIS LLDC2-HC - Palace Close SIL</p> <p>Haringey A19-HR - Branswood Road (SIL 3) A21-HR - North East Tottenham (SIL12) A22-HR - Friem Barnet Sewage Works/Pinkham Way</p> <p>Waltham Forest A24-WF - Argill Avenue LLDC3-WF - Bus Depot, Temple Mill Lane</p> <p>Scale: 0 0.5 1 2 4 Kilometres</p> <p>© Crown Copyright and database right (2016). Ordnance Survey 100021551</p> <p>urbanvision nlwp north london waste plans</p>
MM54	47	7.2	<p>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</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>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 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 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 58, thereby reducing exports. New waste facilities will be assessed against the criteria in Policy 5.</p>
MM55	48	7.4	<p>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 over-arching</u> policy is being delivered. All monitoring indicators are set out in Section 10 of this plan.</p>
MM56	49	7.8	<p>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.</p>
MM57	49	New after 7.8	<p>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.</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM58	49	7.9	<p>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.</p>
MM59	50	7.10	<p>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.</p>
MM60	50	New after 7.11	<p>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.</p>
MM61	50	New after 7.14	<p>There are opportunities for additional recovery capacity to be brought forward on three of the proposed Priority Areas.</p>

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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	<p><u>Recycling</u></p> <p>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 sSome 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</p>
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	<p><u>Landfill</u></p> <p>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.</p>
MM66	52	7.26	<u>Recycling and Recovery</u>

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			<p>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</p>
MM67	52	7.27	<p>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 4.92ha 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.</p>
MM68	64	Policy 1	<p>Policy 1: Existing waste management sites</p> <p>All existing waste management sites identified in <i>Schedule 1: Existing safeguarded waste sites in North London</i>, and any other sites that are given planning permission for waste use, are safeguarded for waste use.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>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.</p> <p>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.</p> <p>Development proposals in close proximity to existing safeguarded waste sites or sites allocated for waste use which would prevent or prejudice the use of these 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.</p> <p>This policy helps meet strategic objectives SO2 and SO3</p> <p>This policy contributes towards Spatial Principles Framework components A and C</p>
MM69	65	9.4	<p>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.</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM70	65	9.6	<p>Some existing waste sites may have the potential to increase their capacity, or provide additional waste services; pPlanning 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.</p>
MM71	65	9.7	<p>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, 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.</p>
MM72	66	9.8 [divided in two]	<p>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</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>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.</p> <p>[Begin new para]</p> <p>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.</p>
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
			<p>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.</p>
MM74	66	9.10	<p>[...]</p> <p>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.</p>
MM75	67	New after 9.10	<p>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.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>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:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>
MM76	67	Policy 2	<p>Policy 2: Priority Areas for new waste management facilities</p> <p>Areas listed in <i>Schedule 2: Areas suitable Priority Areas for waste management</i> and <i>Schedule 3: Areas Priority Areas identified in LLDC Local Plan</i> are identified as suitable for built waste management facilities to meet the identified need set out in Tables 5 and 7.</p> <p>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.</p>

Ref	Page	Policy/ Paragraph	Main Modification																																									
			<p>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.</p> <p>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.</p> <p>Applications for waste management development within the areas Priority Areas identified in Schedule 3 will be assessed by the London Legacy Development Corporation.</p> <p>This policy helps meet strategic objectives SO1, SO2, SO3 and SO5</p> <p>This policy contributes towards Spatial Principles Framework components B, C and E F</p>																																									
MM77	67	Schedules 2 and 3	<p>Table 11: Schedule 2 Areas suitable Priority Areas for waste management</p> <table border="1" data-bbox="660 1045 1588 1361"> <thead> <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> </thead> <tbody> <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> </tbody> </table>	Area ref	Area Name	Size Area (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
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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
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

Ref	Page	Policy/ Paragraph	Main Modification	
			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
MM78	68	9.11 [rearranged]	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.	
MM79	68	9.13	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,	

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 <i>Schedule 2: Areas suitable Priority Areas for waste management and Schedule 3: Areas Priority Areas identified in LLDC Local Plan</i> 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	<p>Policy 3: Windfall Sites</p> <p>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:</p> <p>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;</p> <p>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;</p> <p>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;</p> <p>[...]</p> <p>This policy contributes towards Spatial Framework Principles components B and C</p>
MM84	71	9.23	<p>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</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>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.</p> <p>[split paragraph]</p> <p>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</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM85	71	9.24	<p>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.</p>
MM86	73	Policy 4	<p>Policy 4 – Re-use & Recycling Centres</p> <p>Proposals for Re-use & Recycling Centres will be permitted where:</p> <ul style="list-style-type: none"> 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. <p>This policy helps meet strategic objectives SO1, SO2 and SO3</p> <p>This policy contributes towards Spatial Framework Principles components A and B</p>
MM87	74	9.33	<p>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</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>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.</p>
MM88	74	Policy 5	<p>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:</p> <p>New after a) the proposal maximises the waste management capacity of the site</p> <p>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.</p> <p>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;</p> <p>New after f) heritage assets and their settings are conserved and where appropriate enhanced;</p> <p>i) the development avoids increasing the levels of vulnerability to climate change, makes appropriate adaptation and mitigation measures to achieve this, and helps</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>reduce greenhouse gas emissions makes the fullest possible contribution to climate change adaptation and mitigation</p> <p>m) appropriate permits are held or have been applied for from the Environment Agency</p> <p>This policy helps meet strategic objectives SO4, SO5, SO7 and SO8</p> <p>This policy contributes towards Spatial Framework Principles component C, E and F</p>
MM89	75	9.34	<p>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.</p>
MM90	75	New para after 9.34	<p>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</p>

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

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			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
			<p>viable to do so. Developers must demonstrate how they meet these requirements as part of a submitted Energy Statement.</p> <p>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.</p> <p>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.</p> <p>This policy helps meet strategic objectives SO1 and SO6</p> <p>This policy contributes towards Spatial Framework Principles component D</p>
MM98	84	9.61	<p>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.</p>
MM99	84	Policy 7	<p>Proposals for the provision of new facilities for the management, treatment and disposal of wastewater and sewage sludge will be permitted, provided that:</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<ul style="list-style-type: none"> • 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. <p>This policy helps meet strategic objectives SO1, SO2 and SO5</p> <p>This policy contributes towards Spatial Framework Principles component A and B</p>
MM100	86	Policy 8	<p>Policy 8: Control of Inert Waste</p> <p>Inert waste should be managed as far up the waste hierarchy as possible, including on-site recycling and reuse of such material.</p> <p>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:</p> <ul style="list-style-type: none"> a) The purposes of r 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

Ref	Page	Policy/ Paragraph	Main Modification
			<p>d) Improving land damaged or degraded as a result of existing uses and where no other satisfactory means exist to secure the necessary improvement.</p> <p>Where one or more of the above criteria (a-d) are met, a All proposals using inert waste should:</p> <p>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</p> <p>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.</p> <p>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.</p> <p>This policy helps meet strategic objectives SO1, SO2 and SO3</p> <p>This policy contributes towards Spatial Framework Principle component B</p>
MM101	87	9.68	<p>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</p>

Ref	Page	Policy/ Paragraph	Main Modification																										
			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.																										
MM102	88	10.3	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.																										
MM103	90	10.6 Table 14	<table border="1"> <thead> <tr> <th></th> <th>Indicator</th> <th>Target(s)</th> <th>What it monitors</th> <th>What it monitors</th> </tr> </thead> <tbody> <tr> <td>IN1</td> <td>Waste arisings (Table 6) by waste stream and management route</td> <td>Waste arisings and management in line with forecasts in Table 6 (Baseline Table 3)</td> <td>Strategic Aim (capacity supply and self-sufficiency) Strategic Aim (move waste up Waste Hierarchy) SO1 (resource efficiency) SO3 (net self-sufficiency)</td> <td>To check that the NLWP is planning for the right amount of waste</td> </tr> <tr> <td></td> <td>5. Total quantity of waste arisings managed by waste stream (LACW, C&I and CD&E) and management route (recycling/composting, recovery and disposal)</td> <td>In line with Table 8 in Section 7 and the Data Study</td> <td>Meeting Future Requirements as specified in the NLWP</td> <td>Waste Policy and London Plan targets</td> </tr> <tr> <td></td> <td>11. Number of developments permitted which include disposal of inert waste to land</td> <td>To ensure that inert waste is managed in line with the waste hierarchy</td> <td>% waste diverted and % landfilled</td> <td>Ensure the NLWP delivers a net self-sufficient waste management outcome for the principal waste streams</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td>To ensure that proposals involving the importation and disposal of inert waste to land are achieving in line with waste hierarchy.</td> </tr> </tbody> </table>			Indicator	Target(s)	What it monitors	What it monitors	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)	To check that the NLWP is planning for the right amount of waste		5. Total quantity of waste arisings managed by waste stream (LACW, C&I and CD&E) and management route (recycling/composting, recovery and disposal)	In line with Table 8 in Section 7 and the Data Study	Meeting Future Requirements as specified in the NLWP	Waste Policy and London Plan targets		11. Number of developments permitted which include disposal of inert waste to land	To ensure that inert waste is managed in line with the waste hierarchy	% waste diverted and % landfilled	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.
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				To ensure that proposals involving the importation and disposal of inert waste to land are achieving in line with waste hierarchy.																									

Ref	Page	Policy/ Paragraph	Main Modification				
			<p>IN2</p>	<p>Waste management capacity (Table 8) by waste stream and management route, including existing capacity, new capacity, loss of capacity, compensatory capacity and capacity gaps</p> <p>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)</p> <p>4. Loss of existing waste capacity and provision of replacement capacity</p>	<p>Capacity to meet net self-sufficiency targets in Tables 6 and 8</p> <p>Zero loss of capacity</p> <p>Replacement locally, within the Borough, North London or London</p> <p>Replacement capacity for Brent Cross Cricklewood provided within Barnet</p> <p>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</p>	<p>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</p>	<p>To check that capacity is increasing to meet net self-sufficiency targets</p> <p><u>Ensure sufficient capacity of the right type is available throughout the plan period</u></p> <p>Ensure that capacity is replaced locally unless net self-sufficiency has been met valid planning reasons are provided for not doing so.</p>
			<p>IN3</p>	<p>Location of new waste facilities and</p>	<p>Land within Schedules 1, 2, 3</p>	<p>SO2 (capacity provision) Policy 1: Existing waste management sites</p>	<p>To check that identified sites and areas are being taken up as anticipated.</p>

Ref	Page	Policy/ Paragraph	Main Modification				
				<p>compensatory capacity</p> <p>1. Amount of Land within identified areas or on windfall sites brought forward for waste use during the plan period.</p>	<p>In line with Table 7: landtake requirements</p> <p>SO2 (capacity provision) Policy 1: Existing waste management sites</p> <p>Policy 2: Area allocations Policy 3: Unallocated sites</p>	<p>Policy 2: Area allocations Policy 3: Unallocated sites</p>	<p>To monitor if land within Schedules 1, 2 and 3 is not available or suitable for new waste facilities.</p>
			IN4	<p>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</p>	<p>Less than 25% of land lost</p> <p>If 50% of land is lost this will trigger review of plan</p>	<p>SO2 (capacity provision) Policy 2: Area allocations</p>	<p>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.</p>
			IN5	<p>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</p>	<p>Facilities where non-road forms of transport are used to move waste and recycling</p>	<p>SO5 (sustainability) SO7 (sustainable transport)</p>	<p>Reduce impact on climate change Improve amenity</p>

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				transported through non-road options (where known).				
			IN6	<p>Enforcement action taken against waste sites by the local authority and/or Environment Agency on breach of planning conditions or environmental permit</p> <p>7. Number of approvals for new waste facilities which meet legislative requirements</p>	<p>Zero</p> <p>±00%</p>	<p>SO5 (sustainability) SO8 (protect the environment) Spatial Principles framework (Reduce impact on amenity) Policy 5: Assessment Criteria for waste management facilities and related development</p>	<p>To ensure sites do not cause harm to the environment or local communities</p> <p>Avoid impact on sensitive receptors or maximise scope for effective mitigation</p>	
			IN7	<p>6. Amount of waste imported and exported to landfill by waste stream and management route (LACW, C&I and CD&E)</p>	<p>Exported waste to landfill in line with Table 69 of the NLWP Reduction in waste exports</p>	<p>Net self-sufficiency Changes to imports and exports</p>	<p>Waste exports are in line with those estimated in the NLWP and through the duty to co-operate</p>	
			IN8	<p>8. Number of new CHP facilities serving district heat networks in which the principal</p>	<p>Monitor only</p>	<p>Strategic Aim (green London)</p>	<p>Monitor only</p>	

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				fuel source is residual waste or recovered waste fuel			
			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
MM104		Table 15	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 Monitor Plan performance annually		
			Performance delivery		Support / promote waste reduction initiatives through the planning system		

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MM105a		Schedule 1	Table 1: Schedule 1: Existing safeguarded waste sites in North London										
			Site ID	Site Name	Site Address	Waste Stream	Managed Waste	2012	2013	2014	2015	2016	Borough
			BA R1	Winters Haulage, Oakleigh Road South	British Rai Sidings, Oakleigh Road South, Southgate, London N11 1HJ	C&I / CDE	X	10,495	38,503	40,409	35,379	0	
			BAR 2	Scratchwood Quarry	London Gateway Service Area, M1 Motorway, Mill Hill, London NW7 3HU	CDE	✓	52,835	71,064	99,060	102,527	131,505	Barnet
			BAR 3 ♦	P B Donoghue, Claremont Rd	3 Shannon Close, Claremont Rd, Cricklewood, London NW2 1RR	CDE	✓ (95%)	0	118,964	112,449	112,487	111,226	Barnet

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			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

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			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	0	0	Barnet
			BAR 10	GBN Services Ltd, New Southgate	Land/Prem ises at Oakleigh Road South, Friern Barnet, London N11 1HJ	CDE	✓ (72%)	14,596	29,938	29,456	31,274	10,746	0	0	Barnet
			BAR 11	Upside Railway Yard	Upside Railway Yard, Brent Terrace, Cricklewoo d, London NW2 1LN	CDE	X	0	0	0	0	0	234,930	0	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	0	0	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	0	0	Enfield
			ENF 2	Barrowell Green Recycling Centre	Barrowell Green, Winchmore Hill,	LACW	X	10,715	14,556	13,837	11,541	16,923	0	0	Enfield

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					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			

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				ntal), Adfa Road, Edmonton	Way, Enfield, London N9 OBD								
			ENF 9	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	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

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			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		

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					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

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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 (Edmonton 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	-	

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					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	Hazardo us (C&I)	✓	-	-	-	-	-	-	-	-	-	-	-	6,557	Enfield
			ENF 36	Greenstar Environment al																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								

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				Company (Clapton)	London E5 8QJ											
HAR 1/2				<u>Hornsey Central Depot, Haringey LBC</u>												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

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				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		
			HA R 11	Durnford Street Car Dismantler s & 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		
			WA F 1	Mercedes Parts Centre	21 Chingford Industrial Estate, Hall Lane, Chingford, London E4 8DJ	C&I	✓	0	0	0	0	7			

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			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, Walthamst ow, 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, Walthamste w									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
			WA F 9	Vacant (formerly BD & G parts for Rover)	Roxwell Trading Park, Leyton	C&I	-	0	0	0	0	0	

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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 12±			Argall Metal Recycling Baseforce Metals, Unit ±, 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	
<p>[footnote to BAR3, BAR4, BAR6 and BAR7]</p> <p>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 commenced; replacement capacity for these sites will be sought in accordance with the</p>												

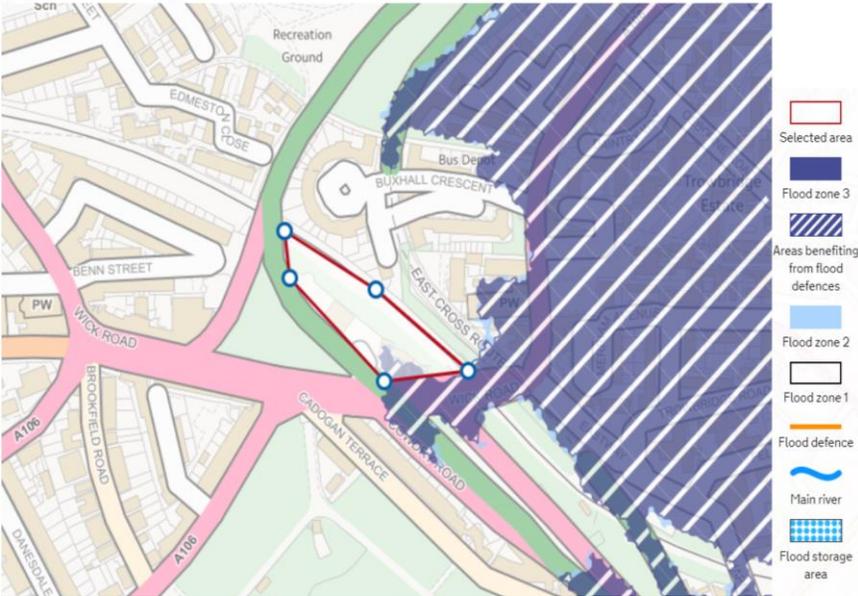
Ref	Page	Policy/ Paragraph	Main Modification
			<p>planning permission for Brent Cross Cricklewood. in early 2018. Replacement capacity for these sites will not be provided prior to their redevelopment and therefore replacement capacity will be sought outside of the BXC regeneration area on alternative 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.</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM105b		HAR 7	[Revision to safeguarded area for HAR 7 in Haringey's Policies Map]

Ref	Page	Policy/ Paragraph	Main Modification
			<p>Existing boundary Proposed new boundary</p>

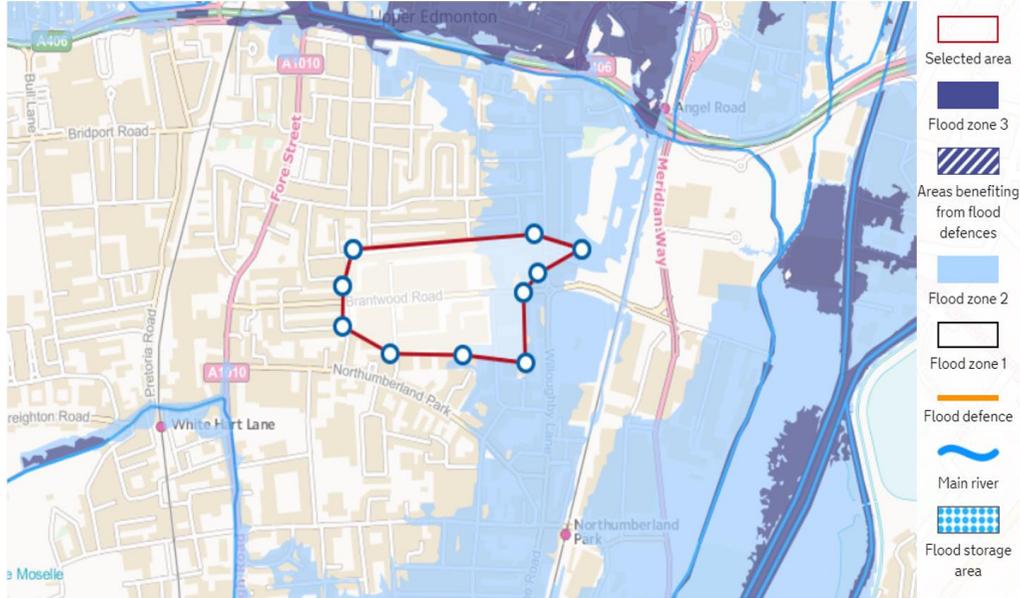
Ref	Page	Policy/ Paragraph	Main Modification			
MM106		Appendix 2: Barnet Area Profiles	<p>A05-BA Connaught Business Centre</p> <table border="1" data-bbox="660 304 2098 485"> <tr> <td data-bbox="660 304 1115 485">Historic Environment</td> <td data-bbox="1115 304 2098 485"> No assets identified in vicinity. 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>		Historic Environment	No assets identified in vicinity. 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.
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MM107		Appendix 2: Enfield Area Profiles	<p>12-EN Eleys Estate, Enfield</p> <table border="1" data-bbox="660 662 2119 1015"> <tr> <td data-bbox="660 662 1115 1015">Historic Environment</td> <td data-bbox="1115 662 2119 1015"> <p>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.</p> <p>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.</p> </td> </tr> </table>		Historic Environment	<p>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.</p> <p>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.</p>
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MM108		Appendix 2: Hackney Area Profiles	<p>A15-HC Millfields LSIS</p> <table border="1" data-bbox="660 1137 2119 1335"> <tr> <td data-bbox="660 1137 1115 1335">Historic Environment</td> <td data-bbox="1115 1137 2119 1335"> <p>There are three Grade II listed buildings adjacent to the west of site:</p> <ul style="list-style-type: none"> • Hackney Borough Disinfecting Station (on Heritage at Risk Register) • Shelter House • Caretakers Lodge </td> </tr> </table>		Historic Environment	<p>There are three Grade II listed buildings adjacent to the west of site:</p> <ul style="list-style-type: none"> • Hackney Borough Disinfecting Station (on Heritage at Risk Register) • Shelter House • Caretakers Lodge
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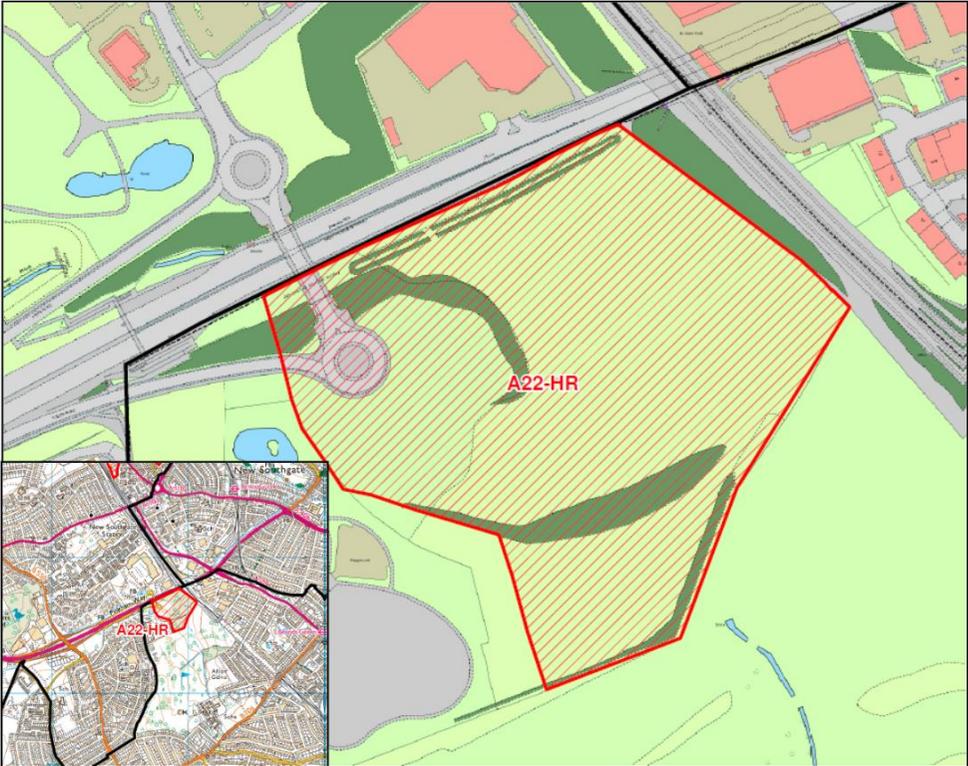
Ref	Page	Policy/ Paragraph	Main Modification	
				<p>The Mandeville Primary School which is Grade II listed is situated to the south of the area.</p> <p>Historic England has commented that any development within the area located to the east and north of these assets must address their long term conservation needs in a comprehensive manner.</p> <p>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.</p>
MM109		Appendix 2: Hackney LLDC Area Profiles	LLDC1-HC Bartrip Street	<p>Flood Risk</p> <p>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.</p> <p>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.</p> <p>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</p>

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			<p>and a site-specific flood risk assessment should consider how much these benefit the site area.</p> <p>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.</p> <p>Part of the site area benefits from existing flood defences.</p> <p>Part of the site area benefits from existing flood defences.</p> <p>[updated map]</p> 

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MM110		Appendix 2: Hackney LLDC Area Profiles	<p data-bbox="658 261 1265 293">LLDC2-HC Chapman Road (Palace Close)</p> <table border="1" data-bbox="658 347 2121 1251"> <tr> <td data-bbox="658 347 965 1251">Flood Risk</td> <td data-bbox="965 347 2121 1251"> <p data-bbox="976 352 2110 411">Flood Zone 2 (Medium probability of flooding) however the area benefits from flood defences.</p> <p data-bbox="976 424 1615 453">The area is at risk from surface water flooding.</p> <p data-bbox="976 504 2101 730">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.</p> <p data-bbox="976 783 2096 971">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.</p> <p data-bbox="976 986 2067 1078">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.</p> <p data-bbox="976 1131 1966 1160">The majority of the site area benefits from existing flood defence.</p> </td> </tr> </table>	Flood Risk	<p data-bbox="976 352 2110 411">Flood Zone 2 (Medium probability of flooding) however the area benefits from flood defences.</p> <p data-bbox="976 424 1615 453">The area is at risk from surface water flooding.</p> <p data-bbox="976 504 2101 730">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.</p> <p data-bbox="976 783 2096 971">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.</p> <p data-bbox="976 986 2067 1078">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.</p> <p data-bbox="976 1131 1966 1160">The majority of the site area benefits from existing flood defence.</p>
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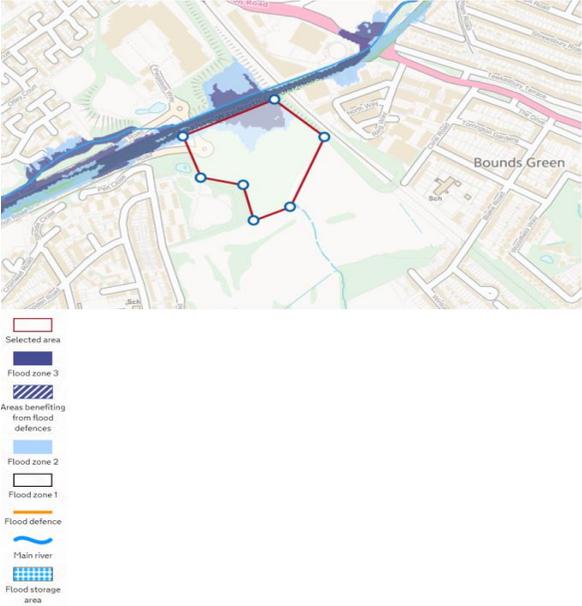
Ref	Page	Policy/ Paragraph	Main Modification	
			<p>[updated map]</p>	
MM111		Appendix 2: Haringey Area Profiles	A19-HR Brantwood Road	<p>Flood Risk</p> <p>The eastern section of the area lies within Flood Zone 2 (medium probability of flooding). The area is at risk from surface water flooding.</p> <p>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.</p>

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			<p>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.</p> <p>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.</p> <p>[updated map]</p> 			
MM112		Appendix 2: Haringey Area Profiles	<p>A21-HR North East Tottenham</p> <table border="1" data-bbox="651 1305 2134 1374"> <tr> <td data-bbox="651 1305 1137 1374">Historic Environment</td> <td data-bbox="1137 1305 2134 1374">No assets identified in vicinity. Within the Lee Valley Archaeological Priority Area. Historic England commented that</td> </tr> </table>		Historic Environment	No assets identified in vicinity. Within the Lee Valley Archaeological Priority Area. Historic England commented that
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			<p>there is potential for archaeological remains to be present and that further assessment should be undertaken.</p>
MM113		Appendix 2: Haringey Area Profiles	<p>A22-HR Pinkham Way</p> <p>A22-HR – Friern Barnet Sewage Works (LEA 4)/ Pinkham Way, Haringey</p>  <p>© Crown Copyright and database right (2016). Ordnance Survey 100021551</p>

Ref	Page	Policy/ Paragraph	Main Modification																				
			<table border="1"> <thead> <tr> <th colspan="2" data-bbox="660 304 2119 344">Area Details</th> </tr> </thead> <tbody> <tr> <td data-bbox="660 344 1115 384">Borough</td> <td data-bbox="1115 344 2119 384">Haringey</td> </tr> <tr> <td data-bbox="660 384 1115 424">Type of Location</td> <td data-bbox="1115 384 2119 424">Area</td> </tr> <tr> <td data-bbox="660 424 1115 464">Location Reference</td> <td data-bbox="1115 424 2119 464">A22-HR – Friern Barnet Sewage Works (LEA 4) /Pinkham Way</td> </tr> <tr> <td data-bbox="660 464 1115 504">Size</td> <td data-bbox="1115 464 2119 504">5.95ha</td> </tr> <tr> <td data-bbox="660 504 1115 584">Area Description</td> <td data-bbox="1115 504 2119 584">Land is currently unused and has become over grown with trees and vegetation.</td> </tr> <tr> <td data-bbox="660 584 1115 663">Description of surrounding uses</td> <td data-bbox="1115 584 2119 663">Pinkham Way and retail park to north, industrial properties east. Golf course south and a park and residential properties to the west.</td> </tr> <tr> <th colspan="2" data-bbox="660 663 2119 703">Planning Information</th> </tr> <tr> <td data-bbox="660 703 1115 775">Planning Designation</td> <td data-bbox="1115 703 2119 775">The Area is designated a Local Employment Area (LEA) and a Borough SINC.</td> </tr> <tr> <td data-bbox="660 775 1115 1270">Relevant Local Plan Policy</td> <td data-bbox="1115 775 2119 1270"> <p>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).</p> <p>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.</p> <p>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.</p> </td> </tr> </tbody> </table>	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	<p>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).</p> <p>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.</p> <p>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.</p>
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				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	<p>The Enfield potential Decentralised Energy area lies approximately 65m northeast of Friern Barnet.</p> <p>Not considered to be a practical option due to distance from potential users.</p> <p>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.</p>
			Details of in-situ infrastructure	None identified
			Constraints	
			Flood Risk	<p>North boundary and northeast corner of the area is within Flood Zone 2 (medium probability of flooding).</p> <p>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.</p> <p>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</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>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.</p> <p>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.</p> <p>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.</p> <p>[updated map]</p> 

Ref	Page	Policy/ Paragraph	Main Modification	
			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	<p>Integrated resource recovery facilities/resource parks, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment Waste transfer, processing and Rrecycling, indoor eComposting, 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.</p> <p>Areas not lying within Flood Zone 3 are potentially suitable to handle hazardous waste.</p>
			Uses unlikely to be suitable	N/A
			Potential mitigation measures	<p>The Area covers land owned separately by the North London Waste Authority and the London Borough of Barnet.</p> <p>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.</p> <p>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</p>

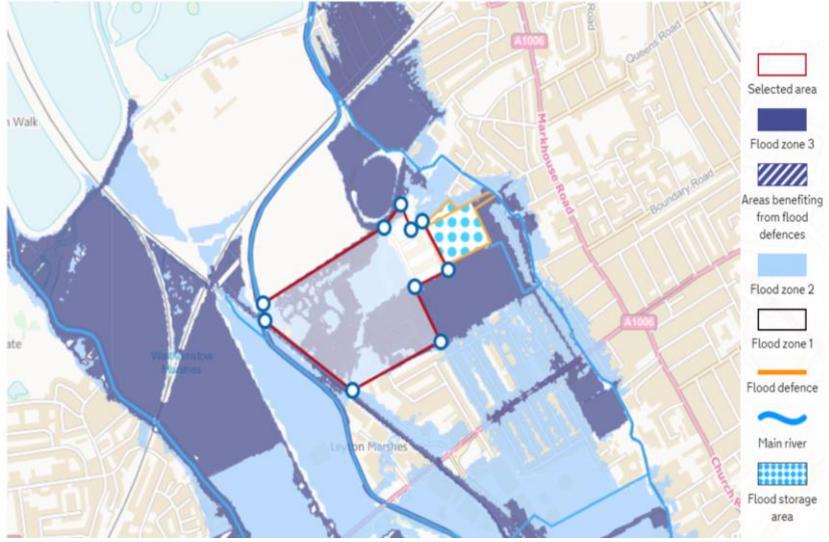
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			<p>development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.</p> <p>Given the constraints on the Area, the site footprint should be minimised, taking into account the necessary 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.</p> <p>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.</p> <p>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.</p> <p>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.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>

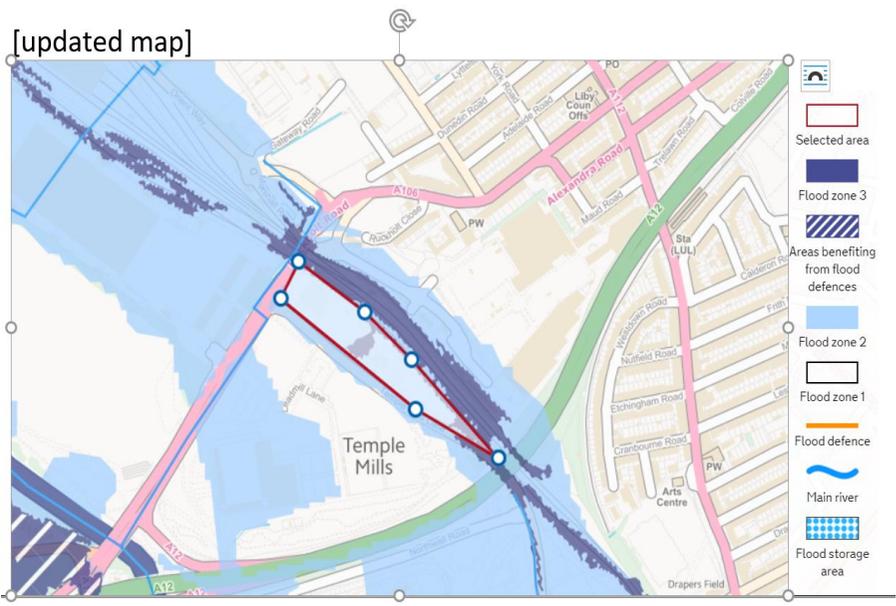
Ref	Page	Policy/ Paragraph	Main Modification
			<p>In line with Local Plan policy DM21: 'Sustainable Design, Layout and Construction', buildings within the development should be designed to complement nature conservation by maximising opportunities to enhance biodiversity, including through appropriate 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.</p> <p>Consideration should also be given to the creation of an appropriate buffer between waste management facility and nearby sensitive receptors.</p> <p>Provision of an acceptable access of from Orion Road Roundabout would be required.</p> <p>Any application should demonstrate how public access to the remainder of the Area could be achieved.</p> <p>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.</p> <p>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.</p> <p>A contamination and ground stability appraisal would be required to assess potential impacts from the historic landfill within the Area boundary.</p>

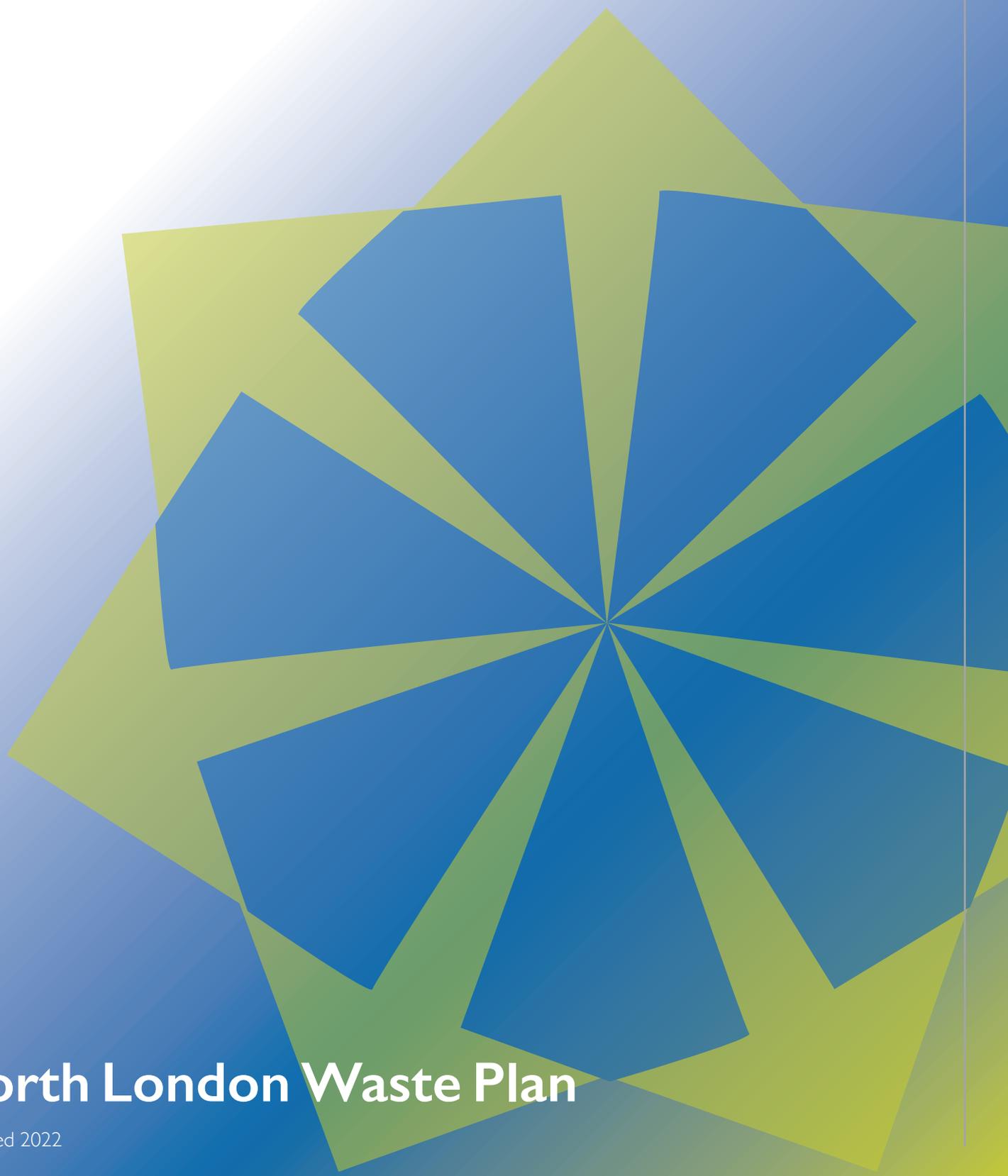
Ref	Page	Policy/ Paragraph	Main Modification					
				<p>As parts of the Area fall within flood Zone 2 and 3 are at a medium risk of flooding, the completion of a suitable Flood Risk Assessment and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures. Any necessary SuDS should be designed to integrate with other nature conservation elements.</p> <p>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.</p>				
MM114		Appendix 2: Waltham Forest Area Profiles	A24-WF Argall Avenue	<table border="1"> <tr> <td data-bbox="663 794 1115 975">Historic Environment</td> <td data-bbox="1115 794 2132 975">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.</td> </tr> <tr> <td data-bbox="663 1023 1115 1370">Flood Risk</td> <td data-bbox="1115 1023 2132 1370"> <p>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.</p> <p>Facilities within Flood Zone 3 should only deal with inert waste unless otherwise agreed with the Environment Agency.</p> <p>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</p> </td> </tr> </table>	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	<p>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.</p> <p>Facilities within Flood Zone 3 should only deal with inert waste unless otherwise agreed with the Environment Agency.</p> <p>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</p>
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Ref	Page	Policy/ Paragraph	Main Modification
			<p>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.</p> <p>However, development should be avoided on the part of the site area which lies within the functional floodplain.</p> <p>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.</p> <p>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.</p> <p>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.</p>

Ref	Page	Policy/ Paragraph	Main Modification					
				<p>[updated map]</p>  <p>The map shows a site outlined in red, situated near the River Lea. It is surrounded by various flood zones: Flood Zone 3 (dark blue), Flood Zone 2 (light blue), and Flood Zone 1 (white). A flood defence (orange line) and a flood storage area (blue grid pattern) are also indicated. The legend includes: Selected area (red outline), Flood zone 3 (dark blue), Areas benefiting from flood defences (hatched), Flood zone 2 (light blue), Flood zone 1 (white), Flood defence (orange line), Main river (blue wavy line), and Flood storage area (blue grid pattern).</p>				
MM115		Appendix 2: Waltham Forest LLDC Area Profiles	<p>LLDC3-WF Temple Mill Lane</p> <table border="1" data-bbox="660 938 2123 1345"> <tr> <td data-bbox="660 938 1115 1082">Historic Environment</td> <td data-bbox="1115 938 2123 1082">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.</td> </tr> <tr> <td data-bbox="660 1125 1115 1345">Flood Risk</td> <td data-bbox="1115 1125 2123 1345">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). Environment Agency — Facilities within Flood Zone 3 should only deal with inert waste unless otherwise agreed with the Environment Agency.</td> </tr> </table>		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 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). Environment Agency — Facilities within Flood Zone 3 should only deal with inert waste unless otherwise agreed with the Environment Agency.
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Ref	Page	Policy/ Paragraph	Main Modification
			<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>[updated map]</p>  <p>The map displays the Temple Mills area with various flood zones and defences. A legend on the right side of the map includes the following items:</p> <ul style="list-style-type: none"> Selected area (Red outline) Flood zone 3 (Dark blue) Areas benefiting from flood defences (Blue hatched pattern) Flood zone 2 (Light blue) Flood zone 1 (White) Flood defence (Orange line) Main river (Blue wavy line) Flood storage area (Blue grid pattern) <p>Key roads shown include Alexandra Road, M106, M102, and M10. Landmarks such as Temple Mills, Arts Centre, and Drapers Field are also labeled.</p>



North London Waste Plan

Adopted 2022

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Sorting paper at a Materials Recycling Facility



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I Introduction and Background



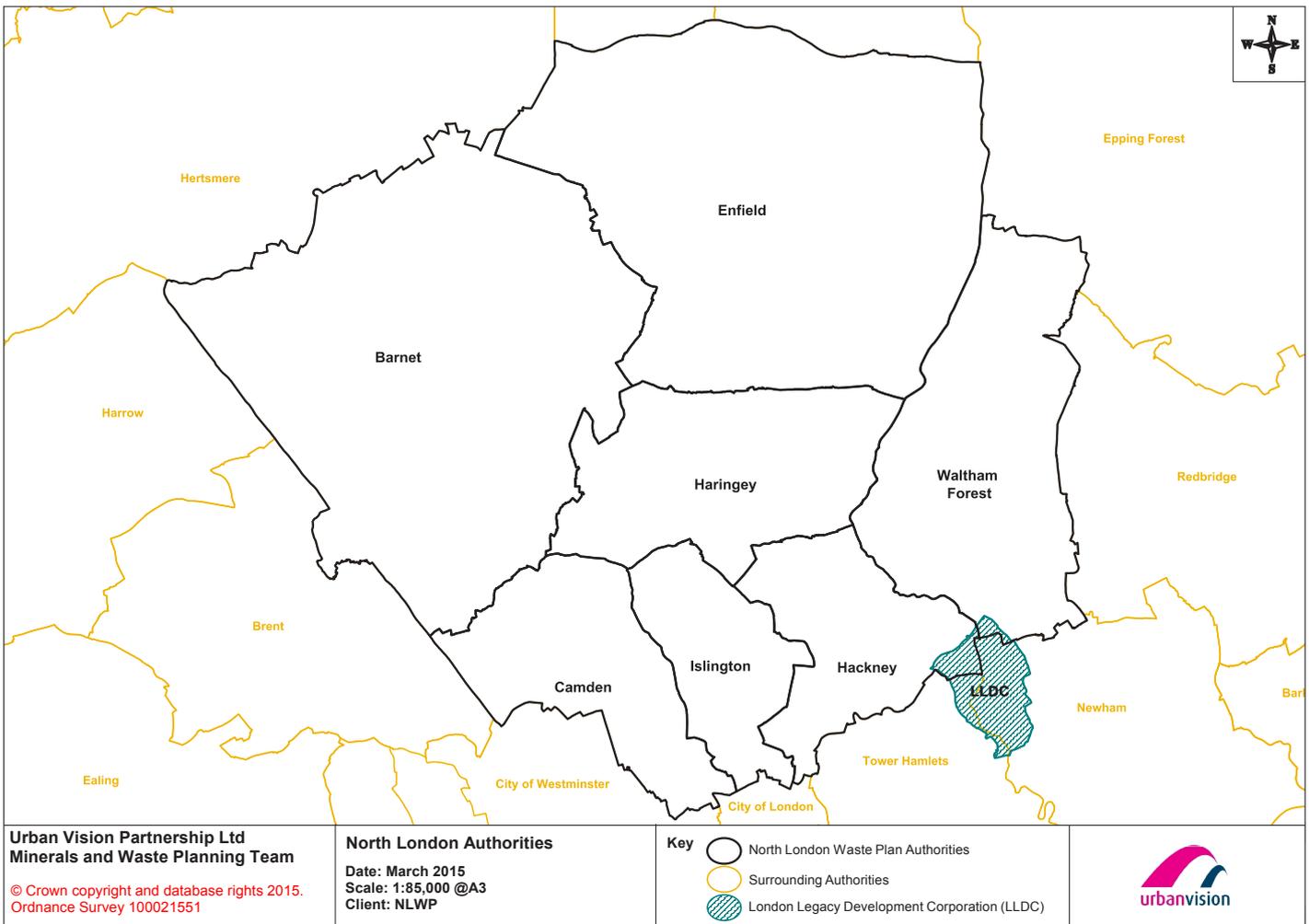
I Introduction and Background

I.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?

I.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



I.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.



I 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.

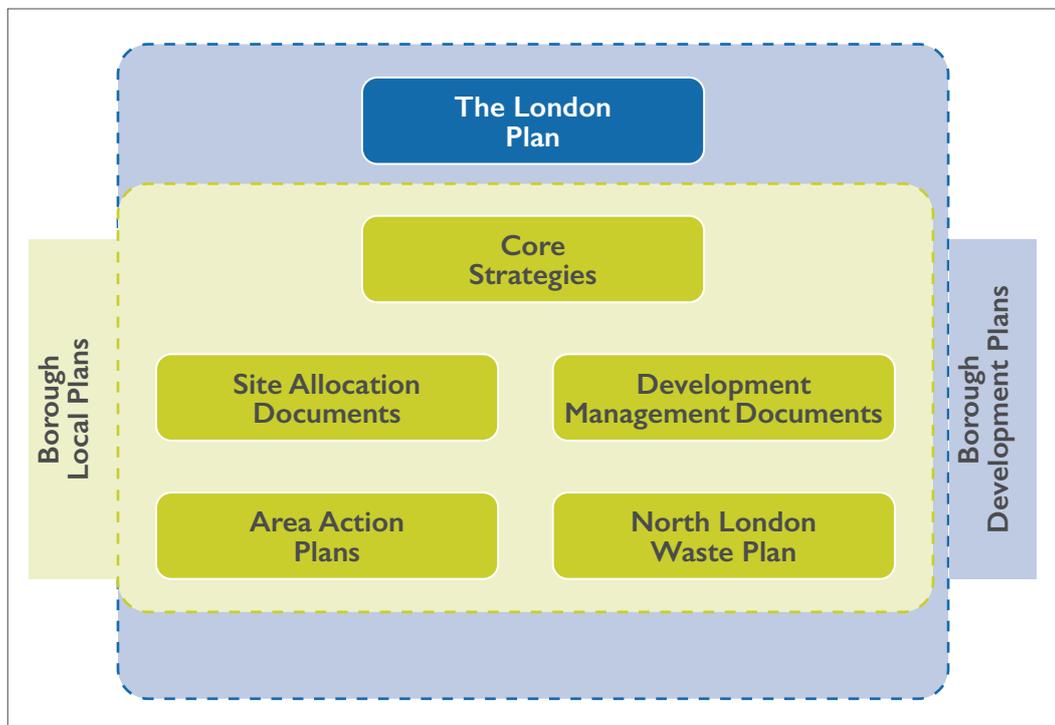


I Introduction and Background continued

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.

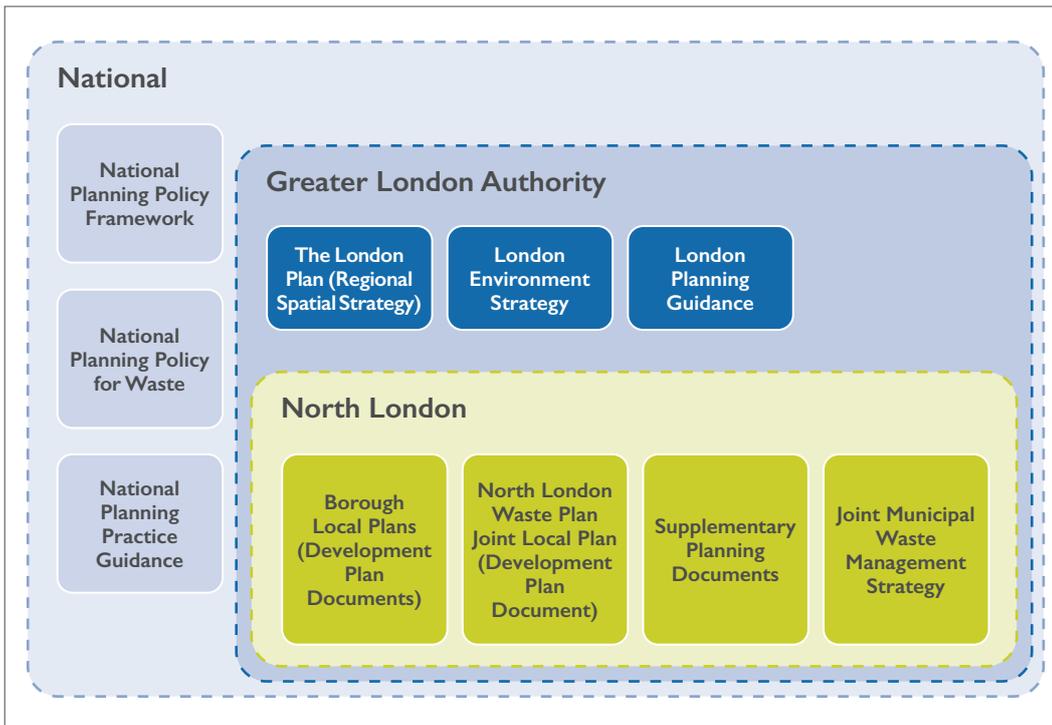
1.12 The North London Waste Authority (NLWA) and the seven constituent boroughs have produced the Joint Municipal Waste Management Strategy (JMWMS) (2009). The NLWA, as the Waste Disposal Authority for the NLWP area, is a key stakeholder. The NLWA is responsible for managing the household waste collected 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.



I 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.



I 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.



Bundles of recyclate at a Materials Recycling Facility



2 Aims and Objectives





2 Aims and Objectives

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:

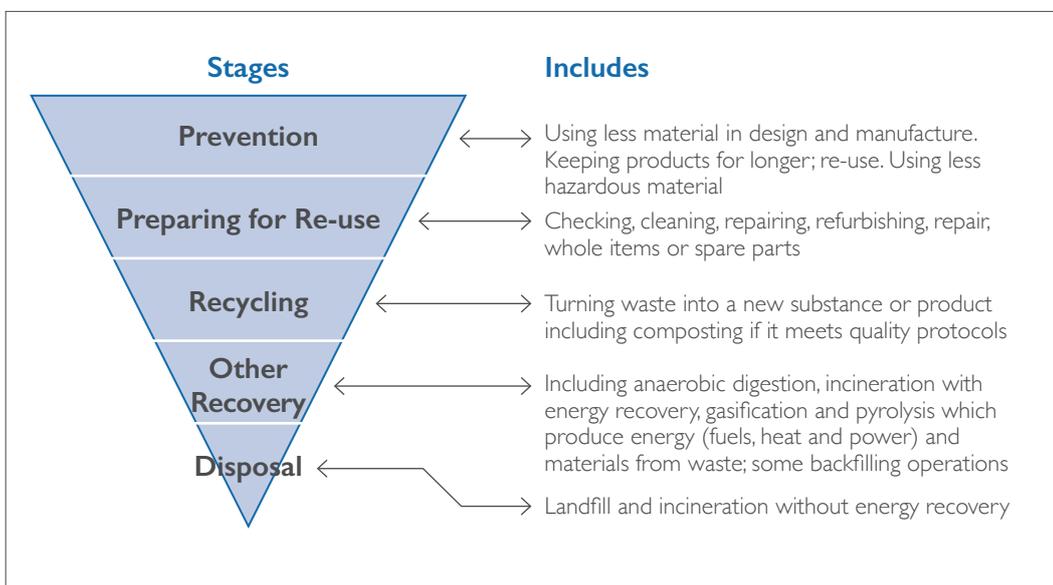
- living within the planet’s environmental limits;
- ensuring a strong, healthy and just society;
- achieving a sustainable economy;
- promoting good governance; and
- using sound science responsibly.

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 CO₂ 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 S18 requires boroughs, when preparing plans, to protect and facilitate the maximum use of existing waste sites.

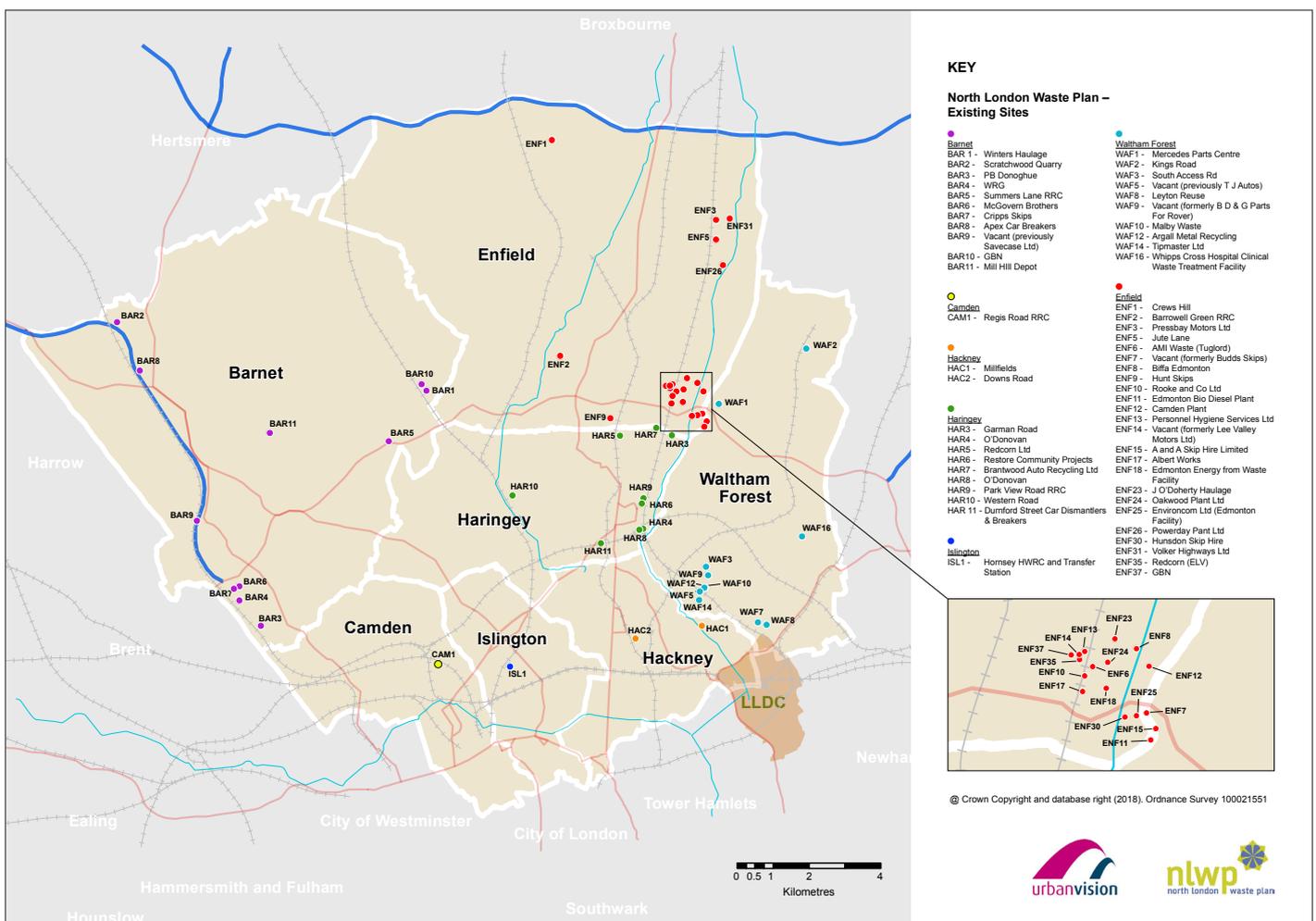
2.18 In line with this and in order to recognise the valuable contribution existing waste facilities make to managing waste effectively, existing waste management capacity has provided the baseline for identifying the waste management capacity gap and the consequent need for expanded and new facilities. 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

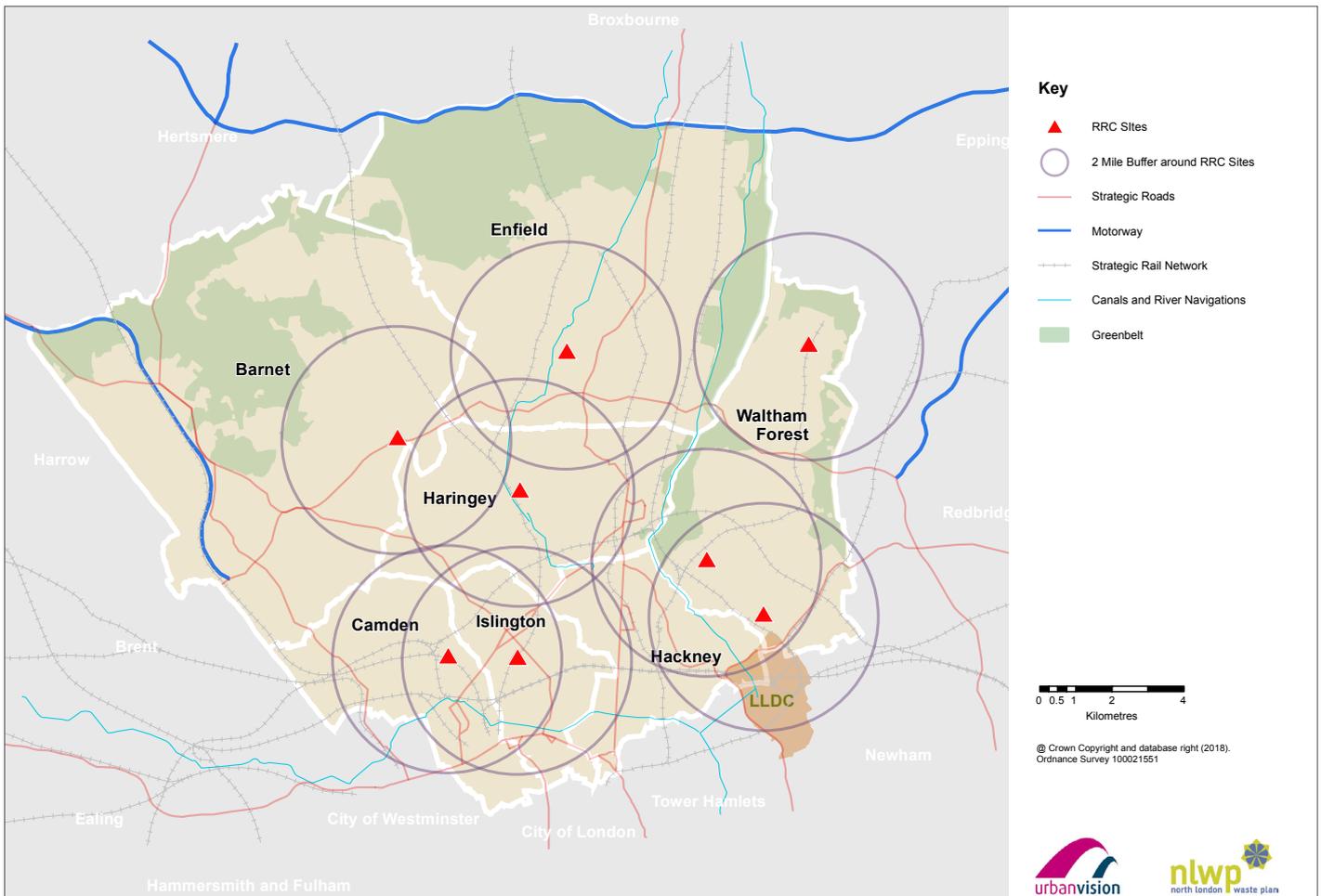


2 Aims and Objectives continued

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

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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 package³, while in London the London Waste and Recycling Board has published a Circular Economy route map⁴.

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 recycle material. *Policy 5* requires developers to consider the possible benefits of co-locating waste development as well as any potential cumulative impacts.



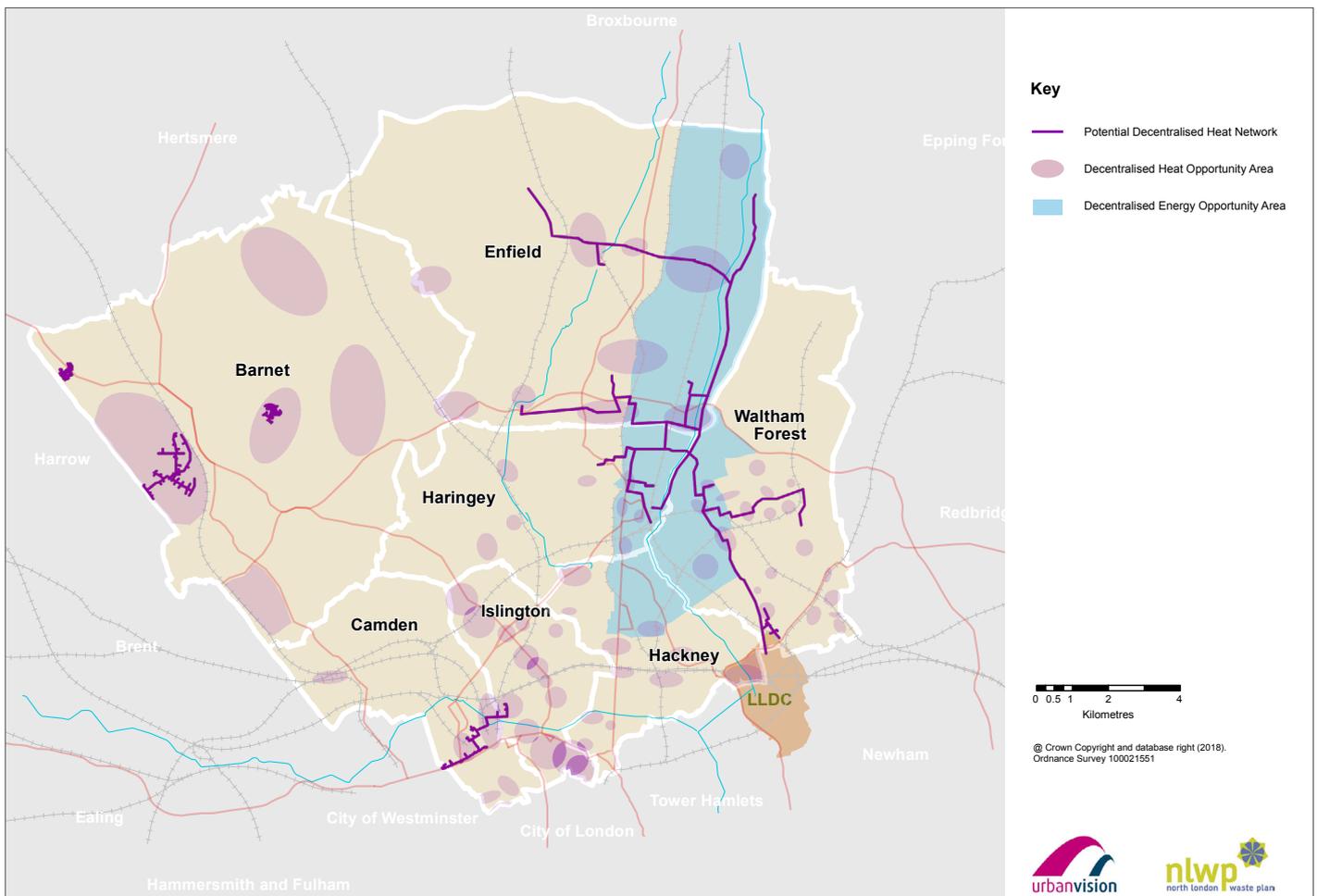
2 Aims and Objectives continued

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 CO₂ 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 (NO₂ 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*.

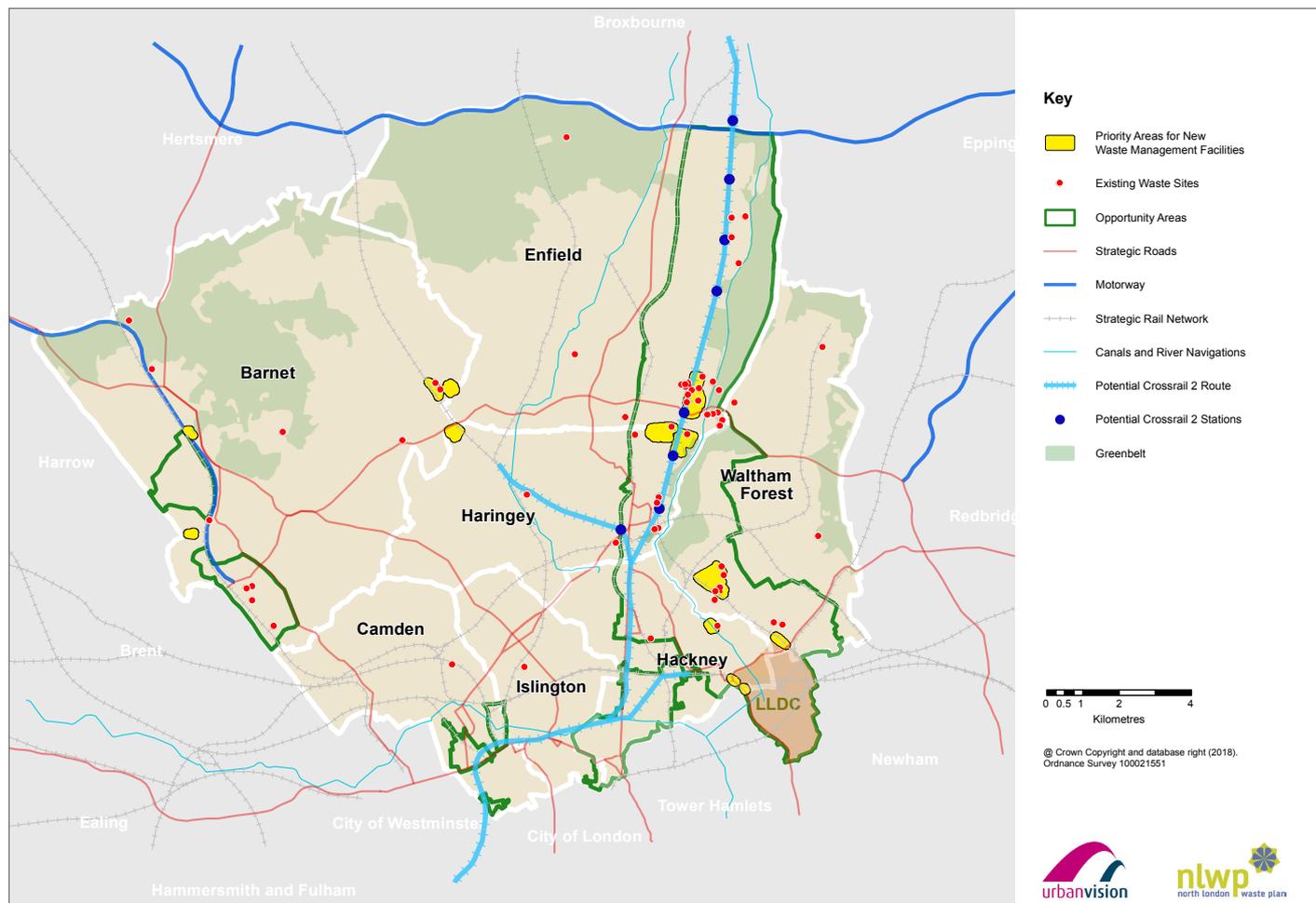
2.51 In addition the Grand Union Canal and the Lee Navigation run through the area and provide sufficient draught to allow light cargo movements to and from industrial and other facilities close to a number of wharves along each waterway.

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 wharves 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.



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 London⁵.

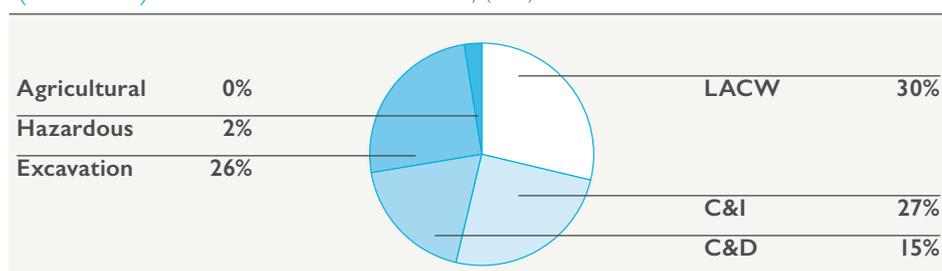
Table 1: Amount of Waste Generated in North London 2016

(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)





3 Current Waste Management in North London continued

⁶ Figures from the [NLWA Annual Monitoring Report 2016-17](#) and [ENVI8 - 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 2016/17⁶. 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 2014⁷. 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.

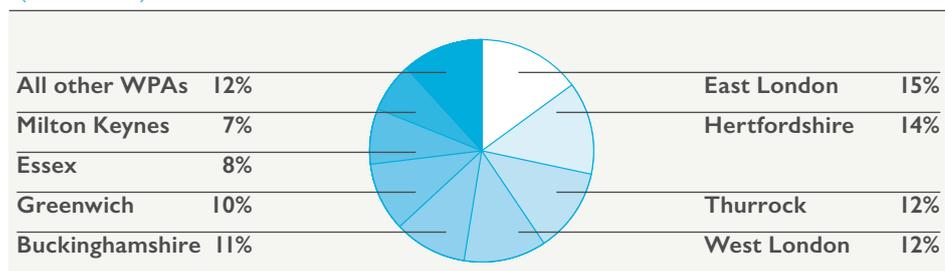
3.19 It should be noted that exports from and imports into North London are not a measure of North London's net self-sufficiency. Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste need in North London, while recognising that some imports and exports 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



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.

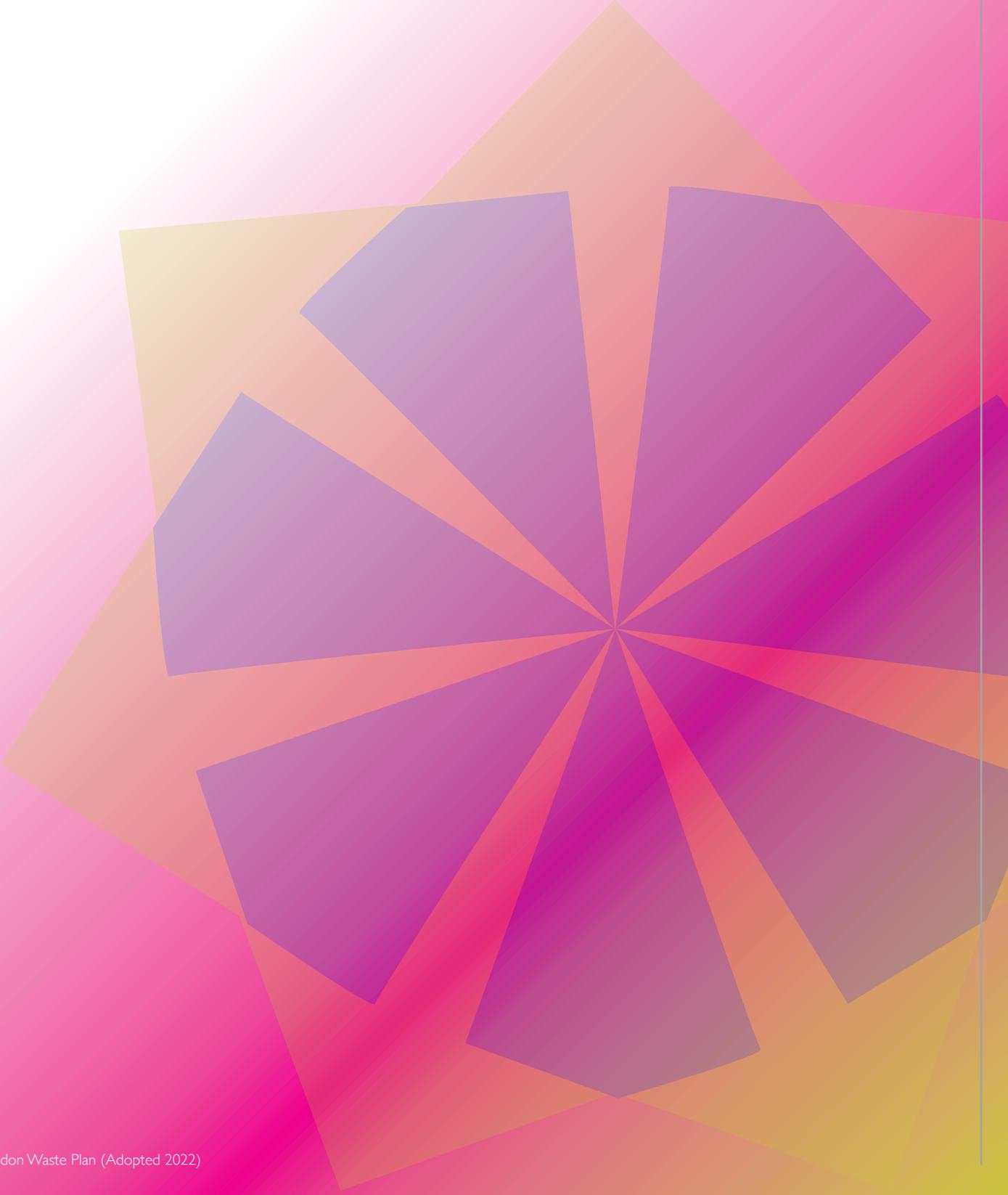
3.27 The boroughs will continue to monitor hazardous waste exports from North London and engage with waste planning authorities who receive strategic amounts of North London's waste when and if there are any substantial changes which may affect waste planning in their area.



Aluminium ready for reprocessing



4 Future Waste Management Requirements





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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 Package⁸. 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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⁹ http://ec.europa.eu/environment/circular-economy/index_en.htm

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 be 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 Package⁹ 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.



4 Future Waste Management Requirements

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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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¹⁰The NLWA Forecasting Model is summarised [here](#)

Table 4: Options Considered for Forecasting North London's Waste Arisings and Need
(■ Chosen scenarios)

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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|| 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^{||}. 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

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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



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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



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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



5 Sites and Areas



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 Waste¹², 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.



5 Sites and Areas continued

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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 Appraisal¹³ and Habitats Regulation Assessment¹⁴ 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
<ul style="list-style-type: none"> • 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) 	<ul style="list-style-type: none"> • 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 be 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.

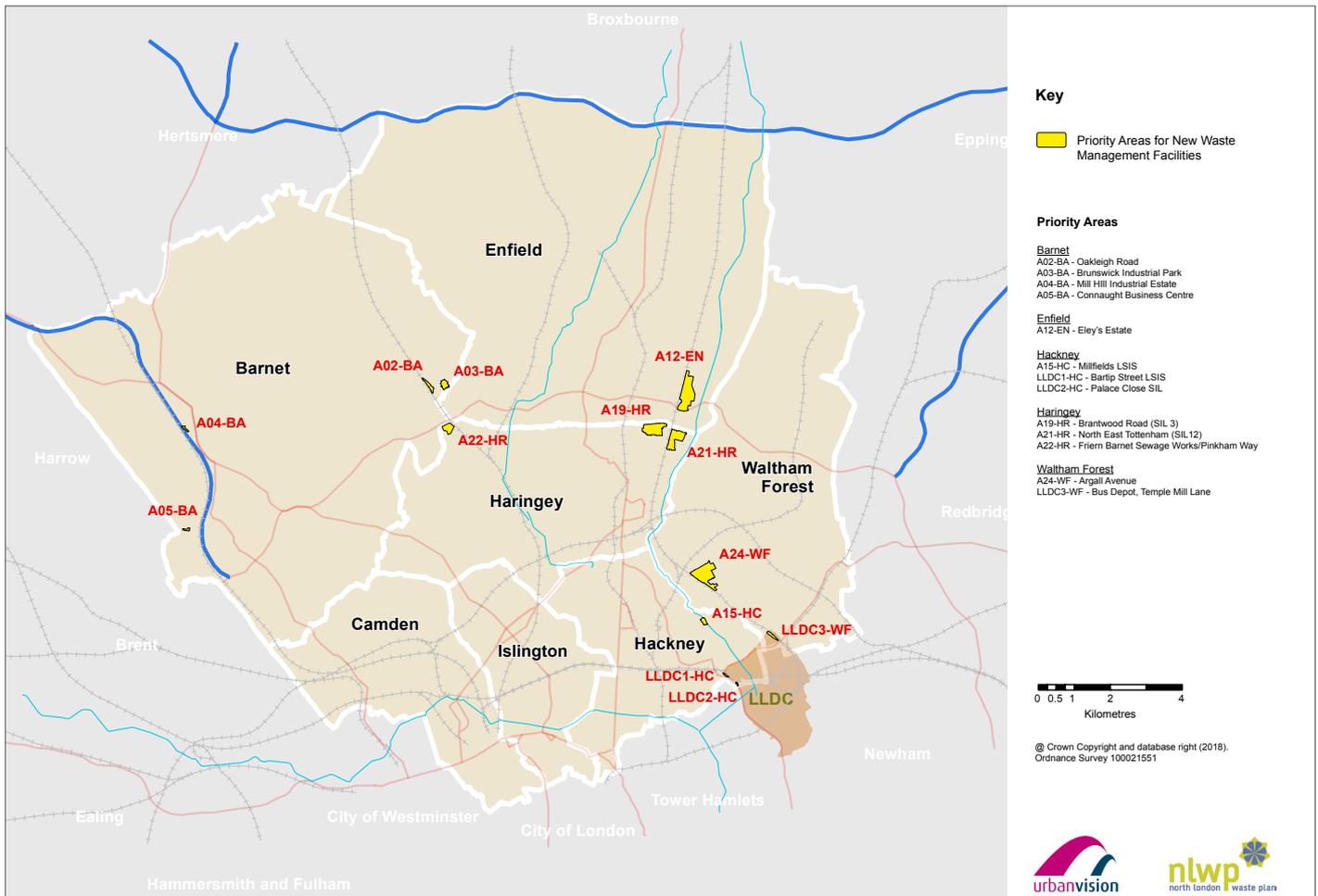
The Impact of Crossrail 2 and Opportunity Areas on Existing Sites and Priority Areas

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



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 Leaside 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 to 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.



6 Provision for North London's Waste to 2036 continued

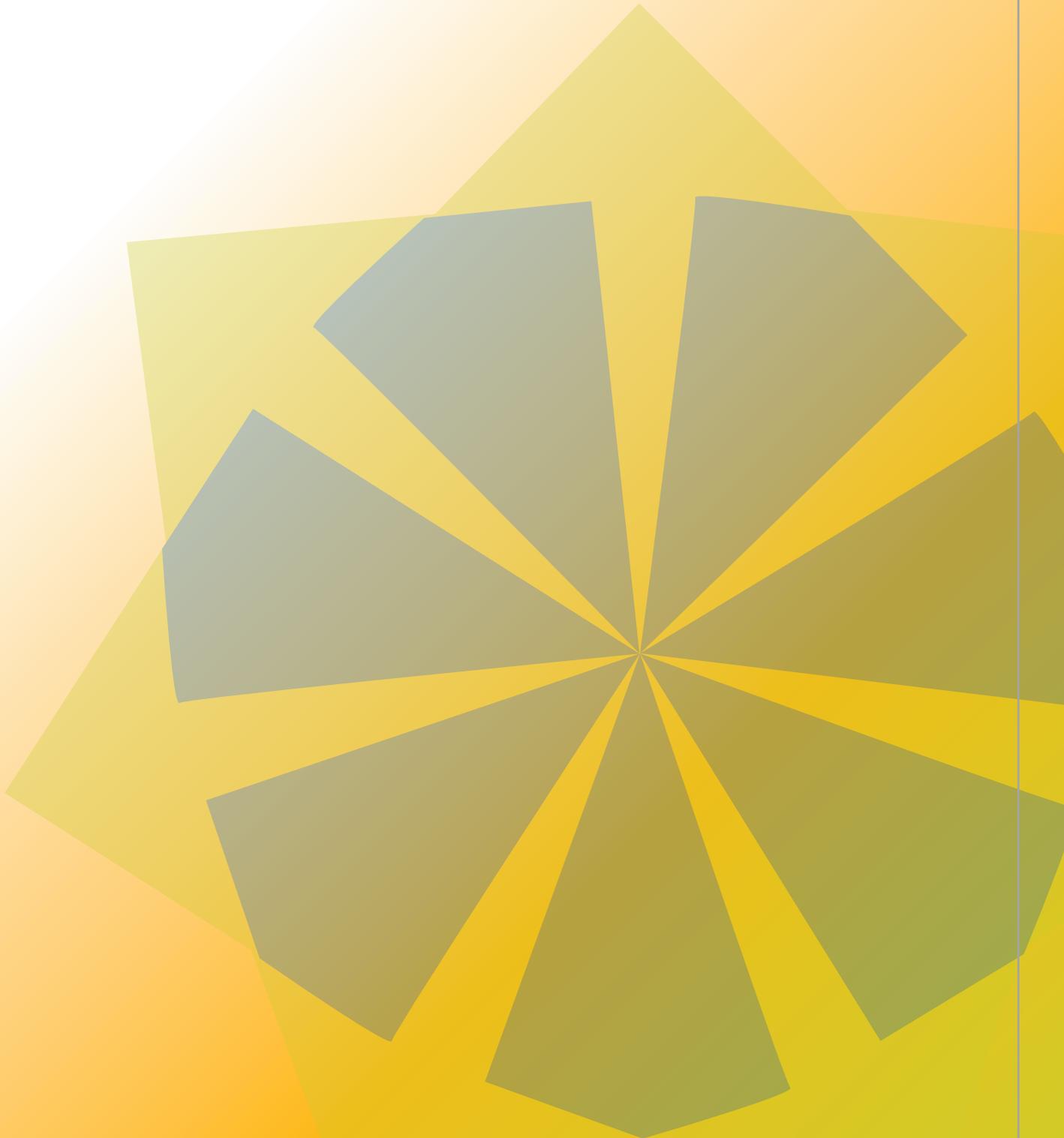
Waste Water

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*.





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	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	Eley's Estate	26.1	Enfield	x	x	x	x	x
A15-HC	Millfields LSIS	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

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	x				x
LLDC2-HC	Chapman Road LSIS (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

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

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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 facility¹⁵ – 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;



7 Policies continued

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¹⁶This 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 opportunities¹⁶;
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

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- 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 facilities¹⁷. 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 deposits¹⁸, 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 measurable 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 5I 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' SFRA's 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

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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 CO₂ 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 2008-2010¹⁹. 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:

- Restoring former mineral working sites; or
- Facilitating an improvement in the quality of land; or
- Facilitating the establishment of an appropriate use in line with other policies in the Local Plan; or
- 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:

- 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
- 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.

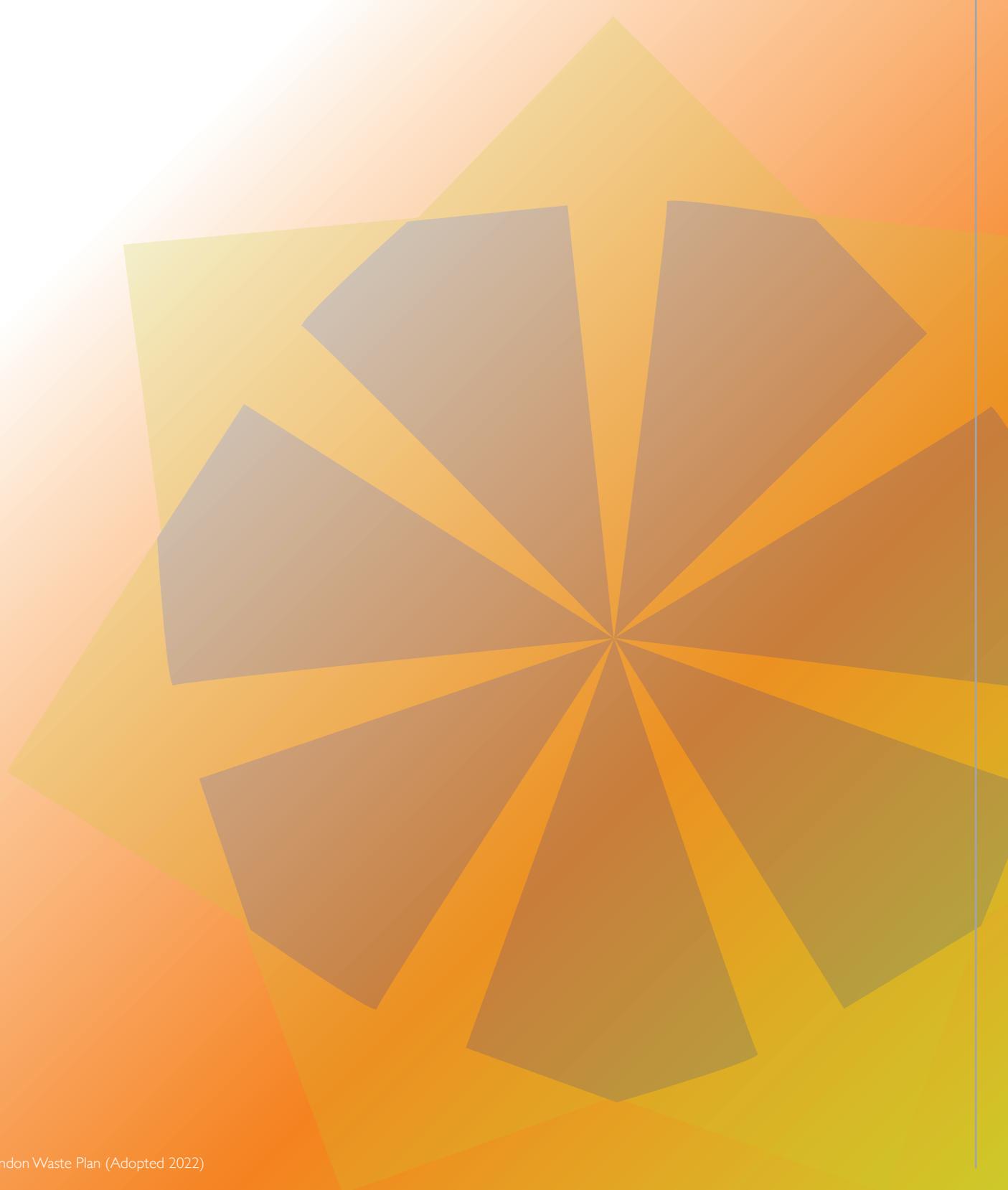
7.79 There should be a clear benefit or benefits from the proposed development. This should be a benefit to the site itself, for example, the use of residual inert material associated with the restoration of an active or dormant mineral working, the restoration of a former mineral working to agriculture 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



8 Monitoring and Implementation





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 (<i>Table 6</i>) by waste stream and management route	Waste arisings and management in line with forecasts in <i>Table 6</i> (Baseline <i>Table 3</i>)	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 (<i>Table 8</i>) 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 <i>Tables 6</i> and <i>8</i> 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 <i>Policy 2</i> : Priority Areas for New Waste Management Facilities <i>Policy 3</i> : Windfall Sites <i>Policy 4</i> : Reuse and Recycling Centres <i>Policy 7</i> : Waste Water Treatment Works and Sewage Plant <i>Policy 8</i> : 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) <i>Policy 1</i> : Existing Waste Management Sites <i>Policy 2</i> : Priority Areas for New Waste Management Facilities <i>Policy 3</i> : 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	<i>Policy 2:</i> 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 <i>Table 8</i>
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) <i>Policy 5:</i> 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 <i>Table 6</i> 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
<i>Policy 1: Existing Waste Management Sites</i>		
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
<i>Policy 2 Priority Areas for New Waste Management Facilities</i>		
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
<i>Policy 3: Windfall Sites</i>		
Planning permission and subsequent development	Landowners and developers/waste management companies/NLWA/local planning authorities/Environment Agency and other statutory bodies	SO2, SO3
<i>Policy 4: Re-use & Recycling Centres</i>		
Planning permission and subsequent development	Landowners and developers/waste management companies/NLWA/local planning authorities/Environment Agency and other statutory bodies	SO1, SO2, SO3
<i>Policy 5: Assessment Criteria for Waste Management Facilities and Related Development</i>		
Planning permission and subsequent development	Local planning authorities/Environment Agency and other statutory bodies	SO4, SO5, SO7, SO8
<i>Policy 6: Energy Recovery and Decentralised Energy</i>		
Planning permission and subsequent development	Landowners and developers/waste management companies/local planning authorities/NLWA/Environment Agency and other statutory bodies	SO1, SO6
<i>Policy 7: Waste Water Treatment Works and Sewage Plant</i>		
Planning permission and subsequent development	Thames Water/Environment Agency and other statutory bodies/local planning authorities	SO2, SO4, SO5, SO8
<i>Policy 8: Inert Waste</i>		
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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Appendix I





Appendix I

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 I: 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
CAMI	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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continued

Schedule I: 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

Appendix I

continued

Schedule I: 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	Hazardous (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	–



Appendix I continued

Schedule I: 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	Hazardous (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
ISLI	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



Appendix I continued

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 BD & 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



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North London Waste Plan

Appendix 2: Area Profiles

November 2021



Schedule 2: Priority Areas for waste management

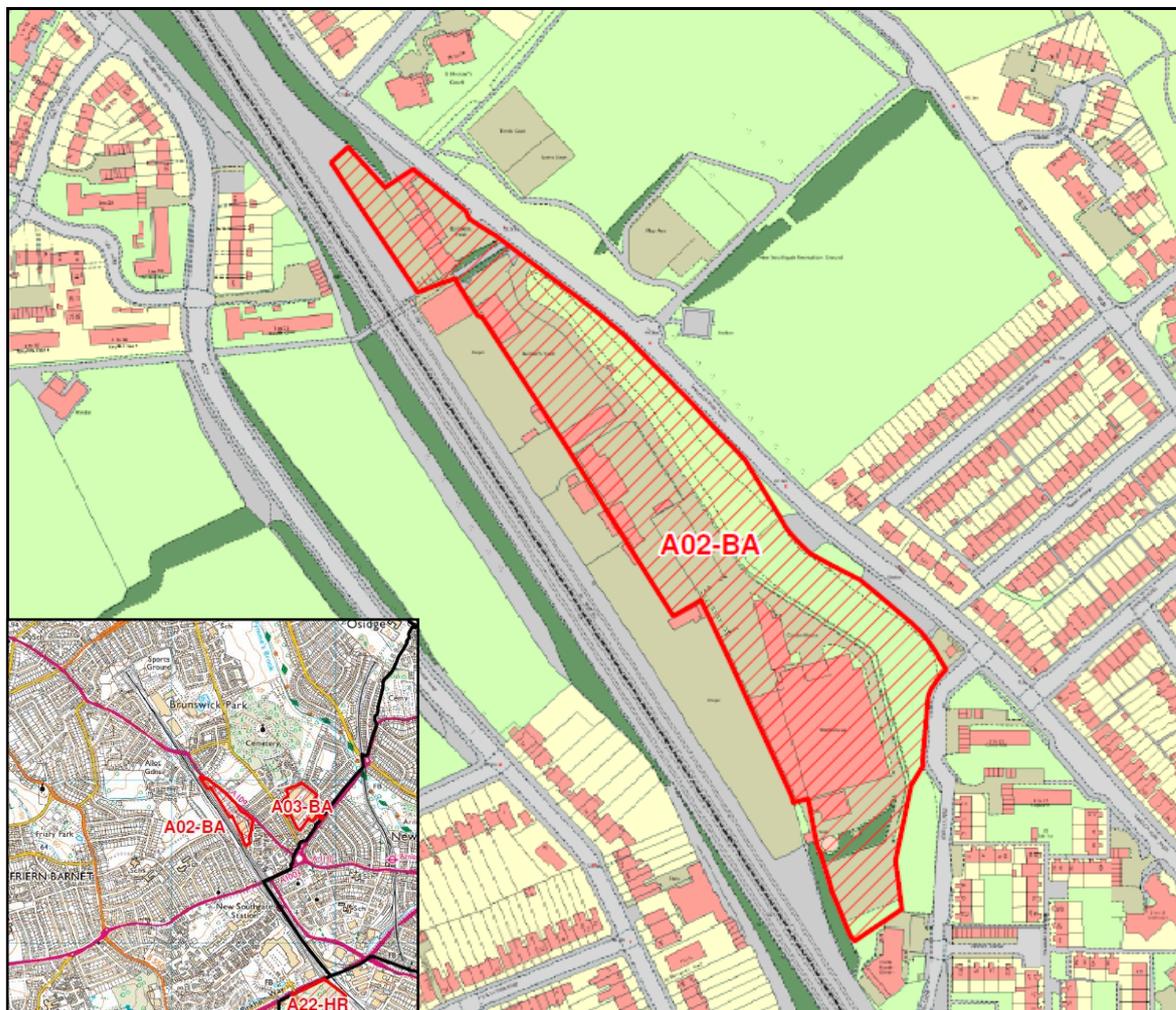
Area ref	Area Name	Borough
A02-BA	Oakleigh Road	Barnet
A03-BA	Brunswick Industrial Park	Barnet
A04-BA	Mill Hill Industrial Estate	Barnet
A05-BA	Connaught Business Centre	Barnet
A12-EN	Eley's Estate	Enfield
A15-HC	Millfields LSIS	Hackney
A19-HR	Brantwood Road	Haringey
A21-HR	North East Tottenham	Haringey
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

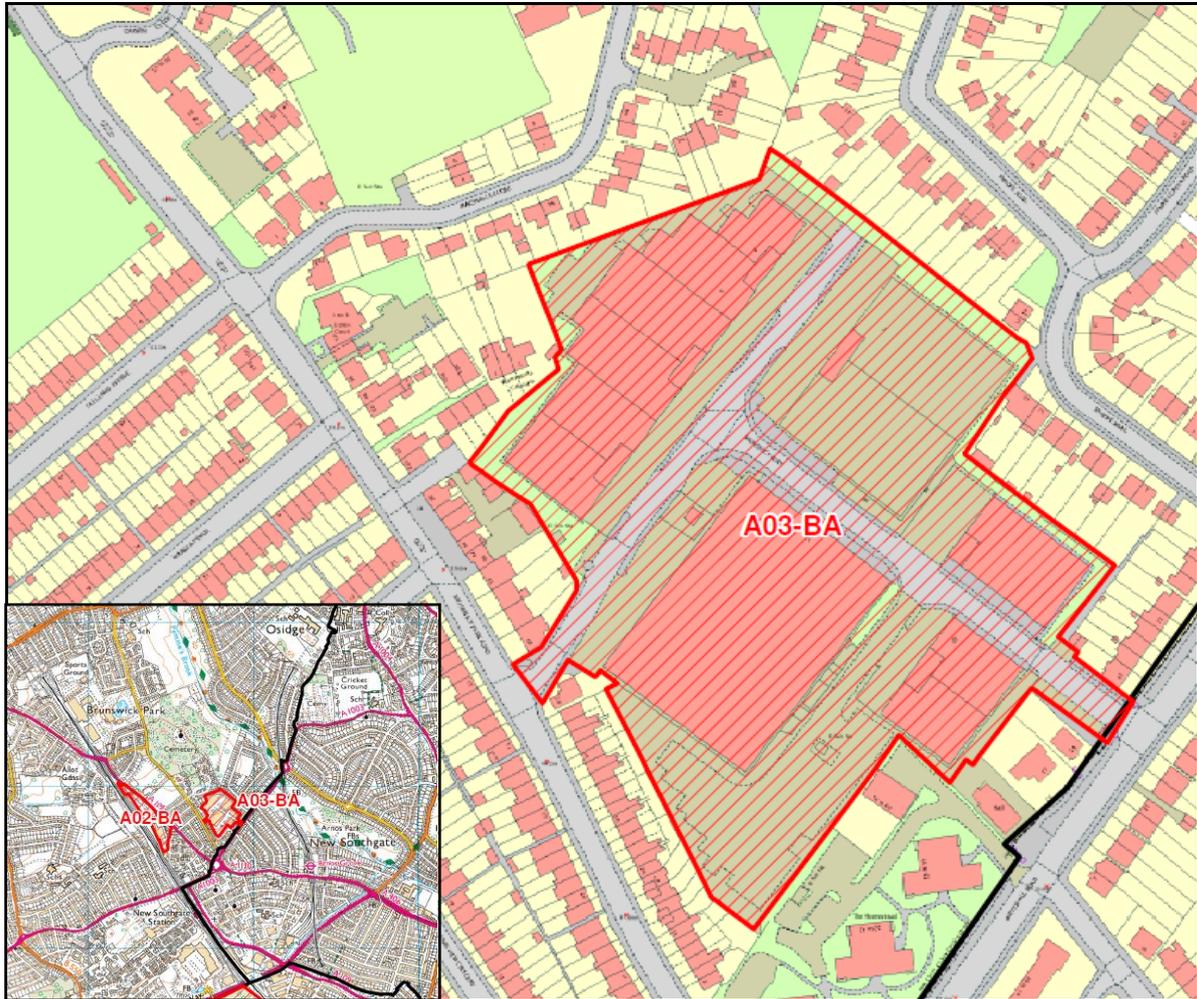
Borough	Barnet
Type of Location	Area
Location Reference	A02-BA - Oakleigh Road
Size	3.10 ha
Area Description	Industrial area, includes a builder's depot, a LB Barnet Council depot which contains a waste management element, and two existing waste management facilities.
Description of surrounding uses	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	<p>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.</p> <p>As proposals may increase the level of traffic generated within the area a traffic impact assessment should be undertaken.</p>
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A03-BA - Brunswick Industrial Park, Barnet

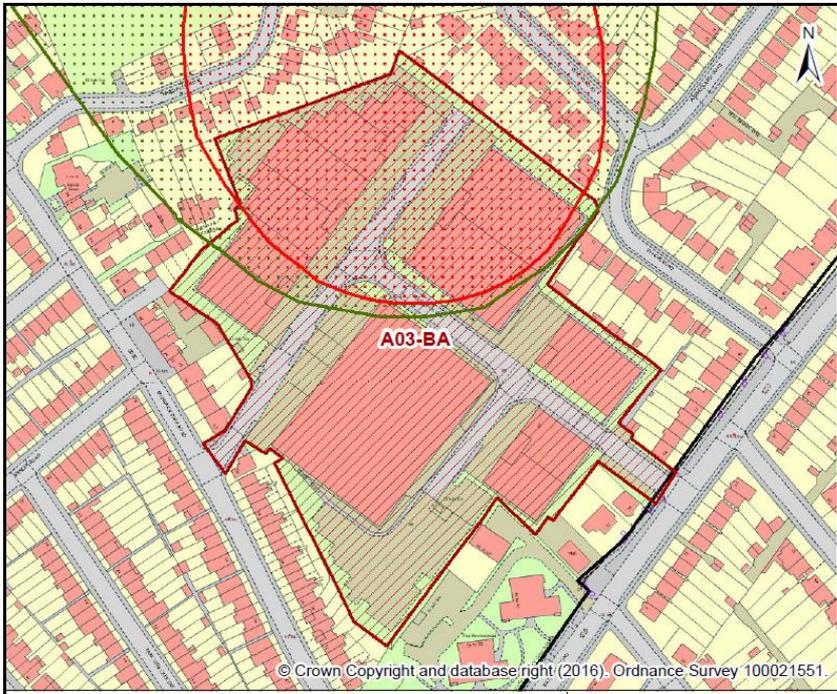
1:2,450 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)



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Area Details

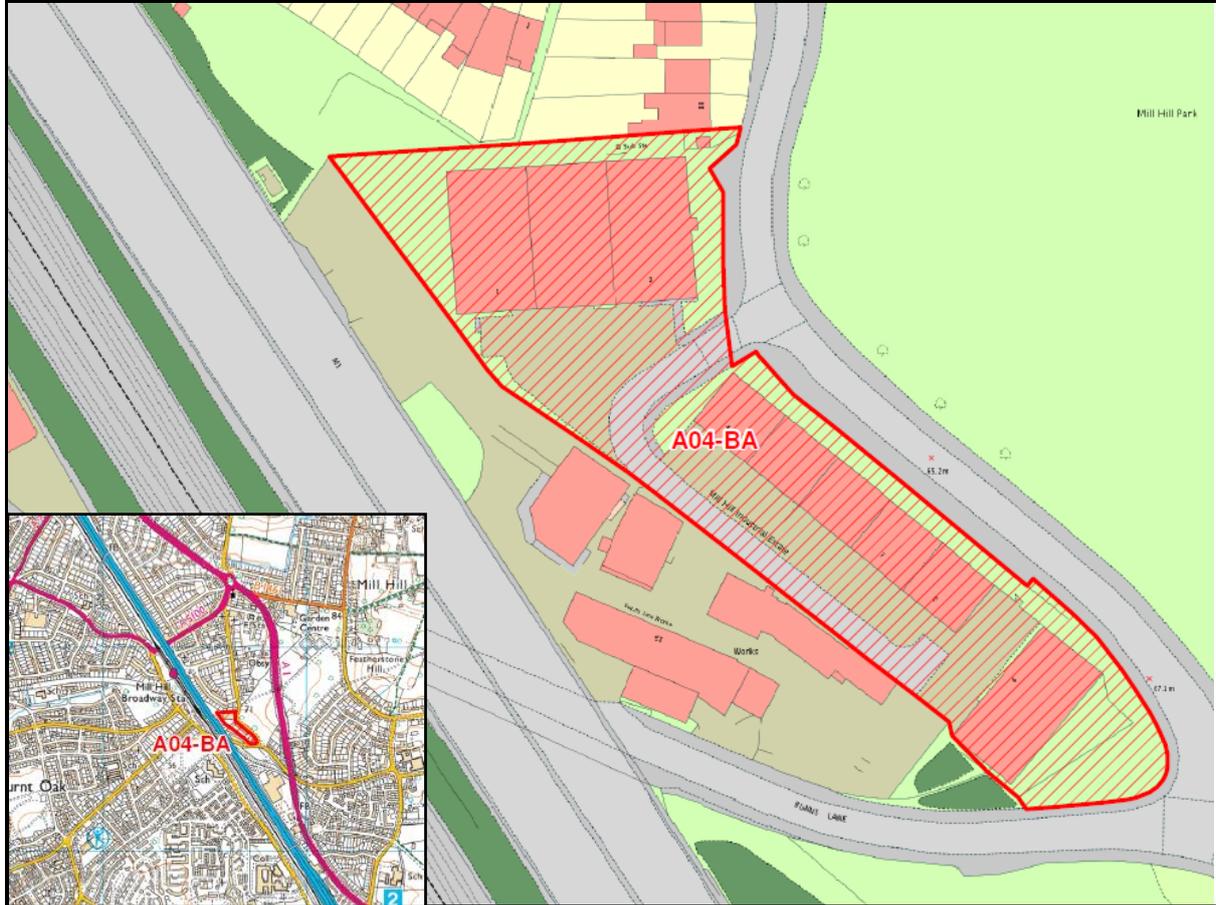
Borough	Barnet
Type of Location	Area
Location Reference	A03-BA - Brunswick Industrial Park
Size	3.95 ha
Area Description	The area is a Business Park which includes a builder's yard and other trade outlets.
Description of surrounding uses	The area is bound on all sides by residential properties. Areas 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.															
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<table border="0"> <tr> <td colspan="2">Key</td> <td rowspan="4">Copyright © and Database rights Environment Agency 2010. All rights reserved. Some of the information within the Flood Map is based in part on digital spatial data licensed from the Centre for Ecology and Hydrology © NERC.</td> </tr> <tr> <td></td> <td>Zone I - Inner Protection Zone</td> <td></td> <td>Proposed Areas</td> </tr> <tr> <td></td> <td>Zone II - Outer Protection Zone</td> <td></td> <td></td> </tr> <tr> <td></td> <td>Zone III - Total Catchment</td> <td></td> <td></td> </tr> </table>		Key		Copyright © and Database rights Environment Agency 2010. All rights reserved. Some of the information within the Flood Map is based in part on digital spatial data licensed from the Centre for Ecology and Hydrology © NERC.		Zone I - Inner Protection Zone		Proposed Areas		Zone II - Outer Protection Zone				Zone III - Total Catchment		
Key		Copyright © and Database rights Environment Agency 2010. All rights reserved. Some of the information within the Flood Map is based in part on digital spatial data licensed from the Centre for Ecology and Hydrology © NERC.														
	Zone I - Inner Protection Zone				Proposed Areas											
	Zone II - Outer Protection Zone															
	Zone III - Total Catchment															

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	<p>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.</p> <p>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.</p> <p>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.</p> <p>As proposals may increase the level of traffic generated within the area a traffic impact assessment will be a key mitigation measure.</p>

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.

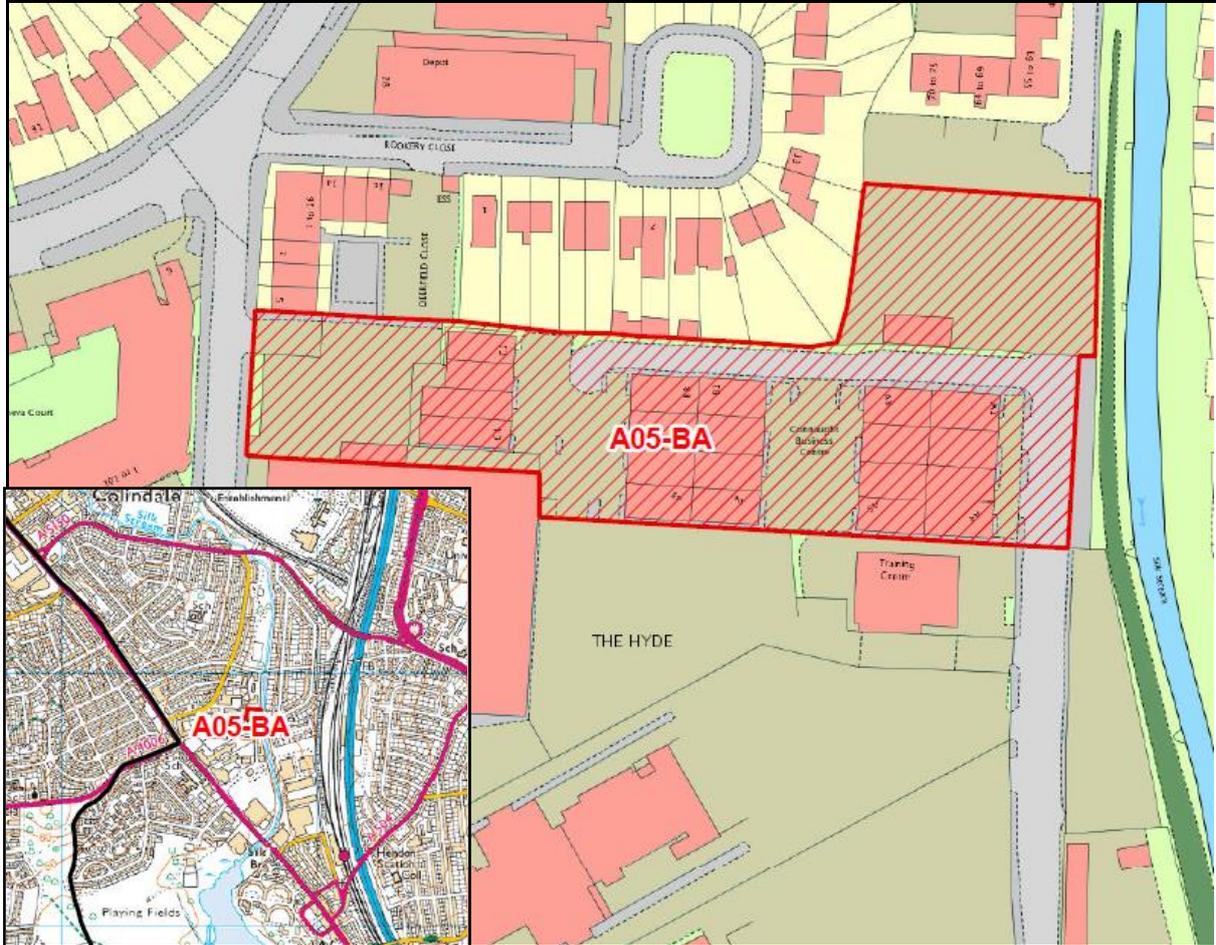
Planning Information

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	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
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A05-BA - Connaught Business Centre, Barnet

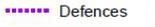
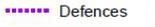
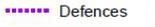
1:1,500 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)



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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.

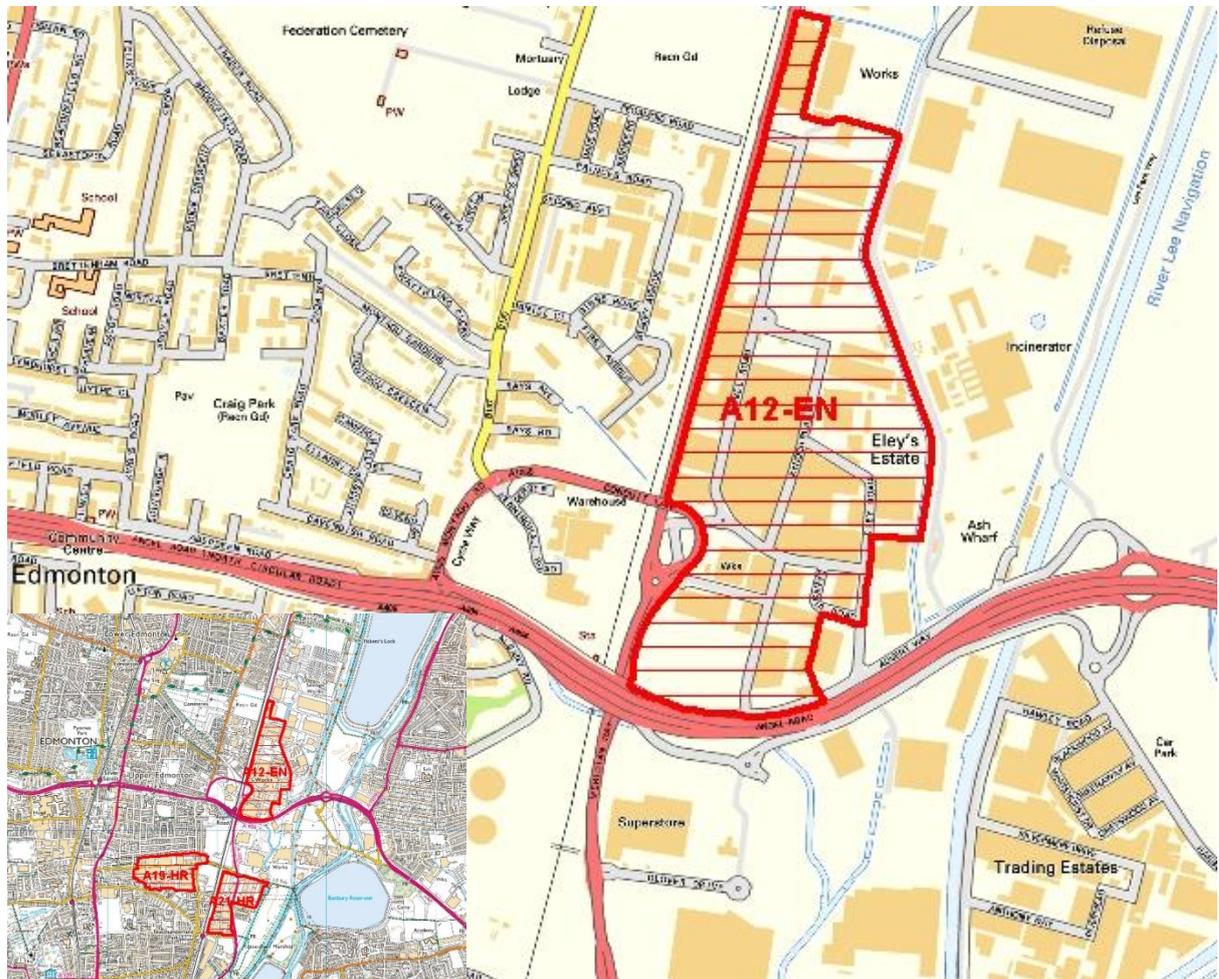
Planning Information																				
Planning Designation	Area is designated a Locally Significant Industrial Site (LSIS). Area is proposed for Article 4 designation to remove PD rights for conversion to residential. Expect to be confirmed Sept 2019.																			
Relevant Local Plan Policy	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	<p>Area is within Flood Zone 2 & 3 (medium and highest probability of flooding) and a stream runs adjacent to the east of the area.</p> <p>Facilities within Flood Zone 3 should only deal with inert waste unless otherwise agreed with the Environment Agency.</p> <p>At high risk of surface water flooding.</p>																			
 <p>© Crown Copyright and database right (2016). Ordnance Survey 100021551.</p>																				
<table border="0"> <tr> <td colspan="2">Key</td> <td rowspan="5"> Copyright © and Database rights Environment Agency 2010. All rights reserved. Some of the information within the Flood Map is based in part on digital spatial data licensed from the Centre for Ecology and Hydrology © NERC. </td> </tr> <tr> <td></td> <td>Flood Zone 3</td> <td></td> <td>Areas Benefiting from Flood Defences</td> </tr> <tr> <td></td> <td>Flood Zone 2</td> <td></td> <td>Flood Storage Areas</td> </tr> <tr> <td></td> <td>Defences</td> <td></td> <td>Proposed Areas</td> </tr> <tr> <td colspan="4"></td> </tr> </table>		Key		Copyright © and Database rights Environment Agency 2010. All rights reserved. Some of the information within the Flood Map is based in part on digital spatial data licensed from the Centre for Ecology and Hydrology © NERC.		Flood Zone 3		Areas Benefiting from Flood Defences		Flood Zone 2		Flood Storage Areas		Defences		Proposed Areas				
Key		Copyright © and Database rights Environment Agency 2010. All rights reserved. Some of the information within the Flood Map is based in part on digital spatial data licensed from the Centre for Ecology and Hydrology © NERC.																		
	Flood Zone 3				Areas Benefiting from Flood Defences															
	Flood Zone 2				Flood Storage Areas															
	Defences				Proposed Areas															

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	<p>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.</p> <p>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.</p> <p>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.</p>

	<p>A contamination and ground stability appraisal would be required to assess potential impacts from the historic landfill adjacent to the area boundary.</p> <p>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.</p>
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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)



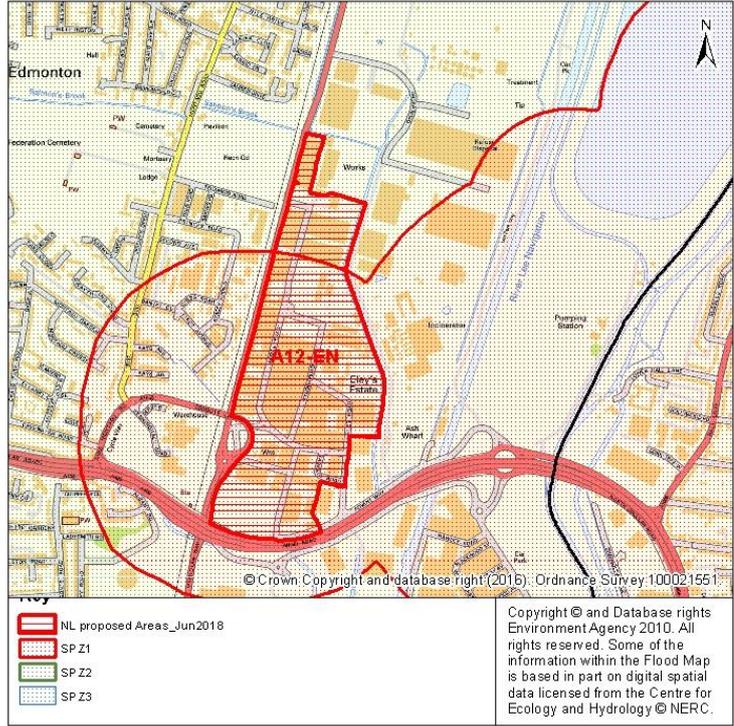
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Area Details

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 Leaside Area Action Plan Area (ELAAP).
Relevant Local Plan Policy	Edmonton Leaside 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 Leaside 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).

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<p>Surface and Groundwater</p>	<p>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.</p> <p>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.</p> <p>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.</p>

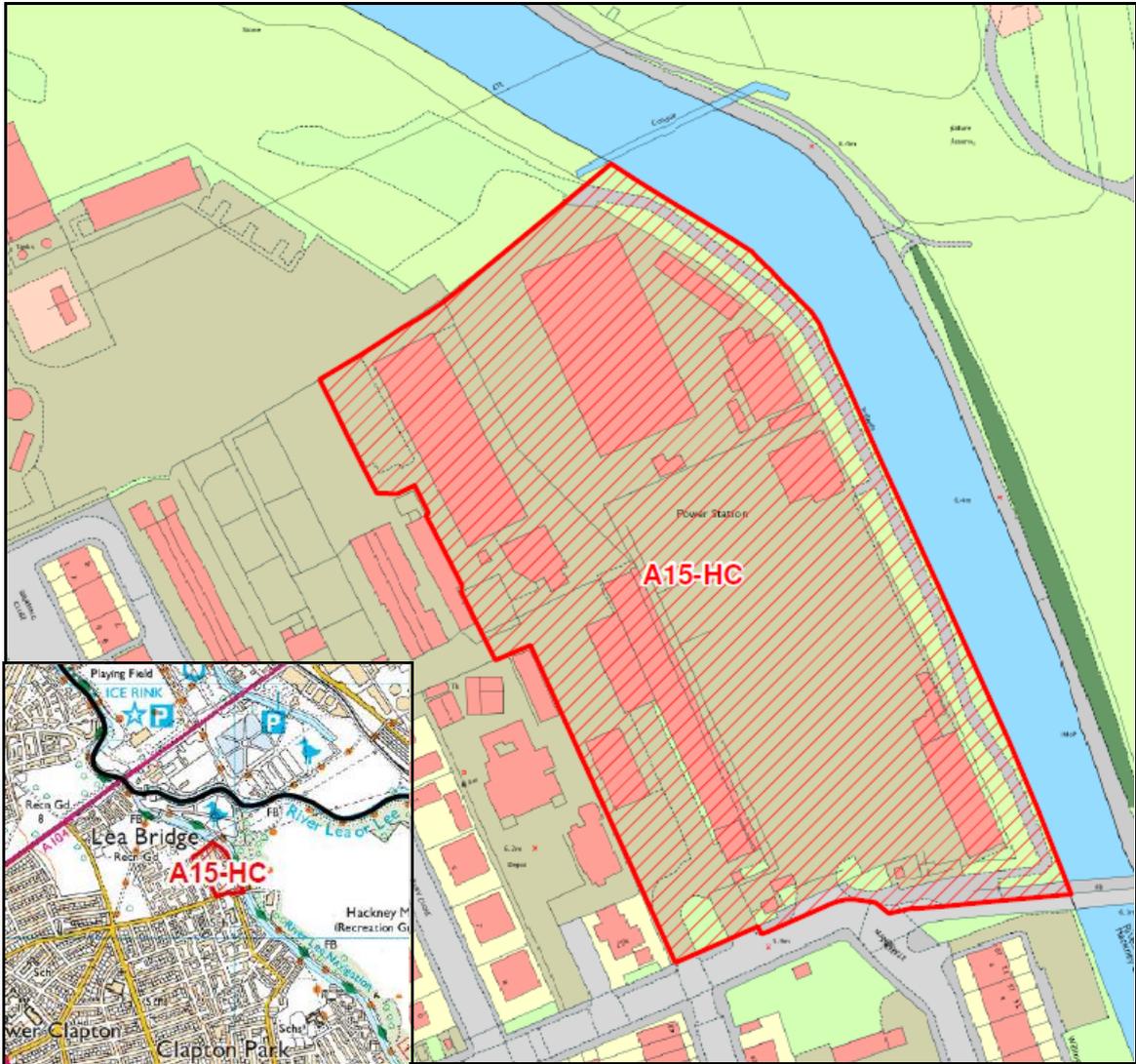
	 <p>The map shows the site A12-EN in Edmonton, Alberta. The site is outlined in red and labeled 'A12-EN'. Surrounding areas are shaded in orange and yellow, representing different types of sensitive receptors (SP Z1, SP Z2, SP Z3). The map includes a north arrow, a scale bar, and a legend. The legend indicates that the red outline represents 'NL proposed Areas_Jun2018', the orange shading represents 'SP Z1', the yellow shading represents 'SP Z2', and the light yellow shading represents 'SP Z3'. The map also shows the Lee Valley Regional Park to the east of the site.</p> <p>© Crown Copyright and database right (2016). Ordnance Survey 100021551</p> <p>Copyright © and Database rights Environment Agency 2010. All rights reserved. Some of the information within the Flood Map is based in part on digital spatial data licensed from the Centre for Ecology and Hydrology © NERC.</p>
<p>Land Instability</p>	<p>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.</p> <p>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.</p>
<p>Sensitive Receptors (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)</p>	<p>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.</p>
<p>Nature Conservation</p>	<p>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).</p>
<p>Green Belt and Open Space</p>	<p>Green Belt land within the Lee Valley Regional Park lies adjacent to the east of the area.</p>

Historic Environment	<p>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.</p> <p>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.</p>
Highways	<p>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.</p> <p>The North Circular Road (adjacent to the south of site) is classed as an Air Quality “hot spot” as emissions regularly surpass the targets.</p>
Conclusion	
Potential Uses	<p>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.</p>
Uses unlikely to be suitable	<p>Outdoor composting. Area is potentially unsuitable to handle hazardous waste.</p>
Potential mitigation measures	<p>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.</p> <p>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.</p> <p>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</p>

	<p>to the area.</p> <p>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.</p> <p>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.</p> <p>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.</p>
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A15-HC – Millfields LSIS, Hackney

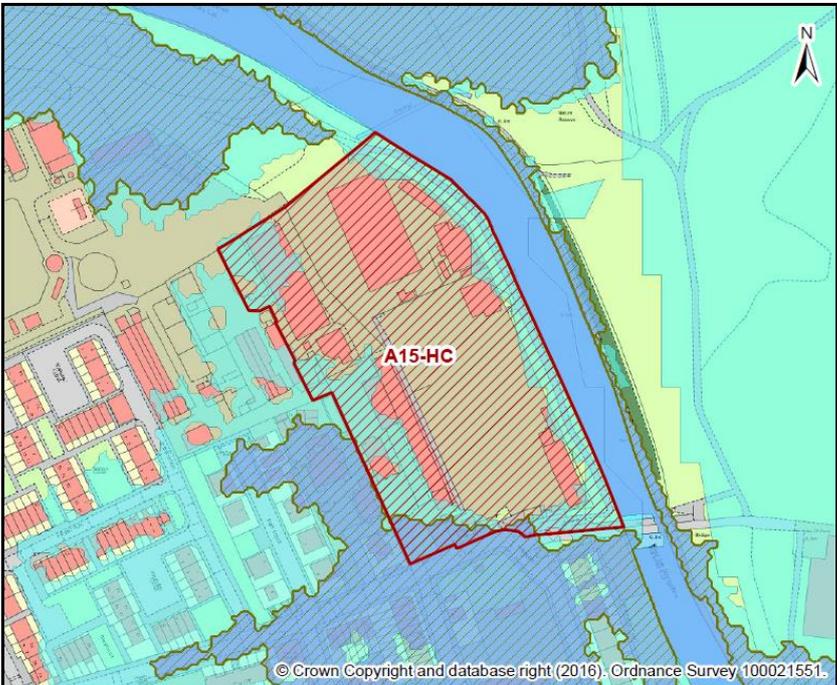
1:1,750 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)



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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

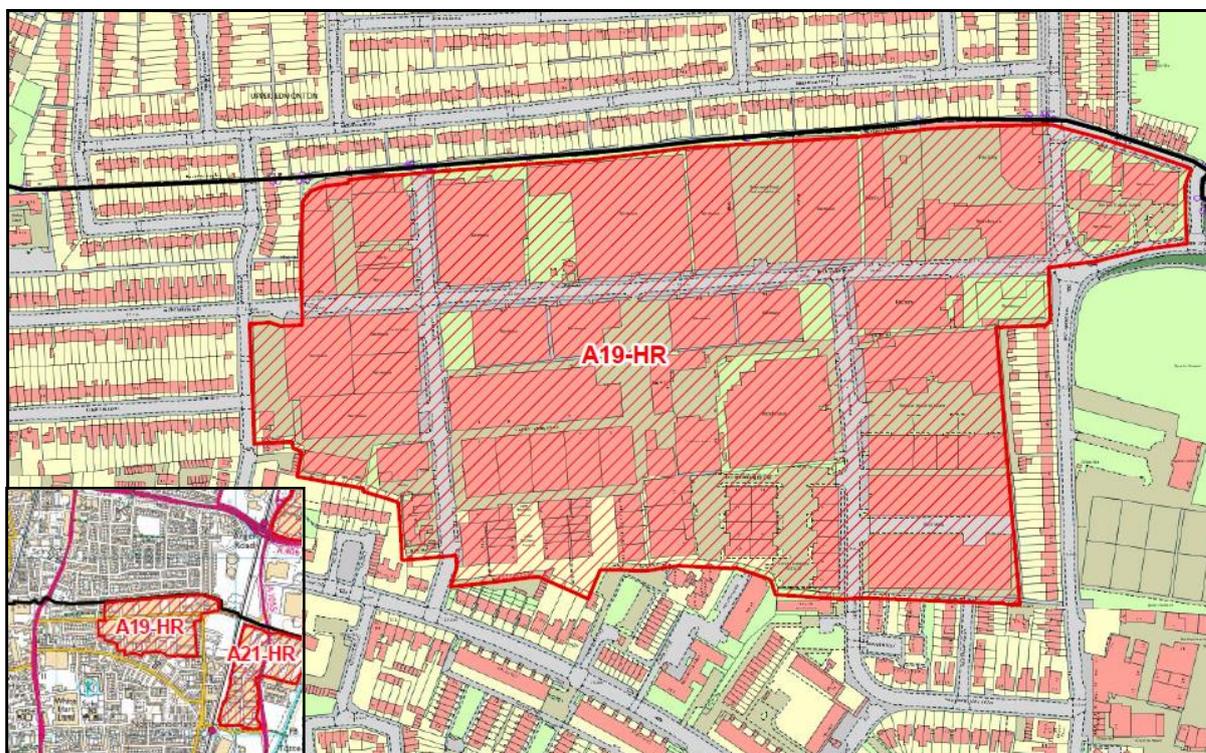
	west.						
Planning Information							
Planning Designation	Area is designated as a Local Significant Industrial Site (LSIS)						
Relevant Local Plan Policy	Core Strategy (2010), Development Management Local Plan (2015), Policies Map.						
Land Use							
Co-location	Location not suitable						
Major New Developments	None within location						
Decentralised Energy Network	None within location						
Details of in-situ infrastructure	National Grid identify the following assets during consultation: <ul style="list-style-type: none"> i. Underground cables – 400kV route – Hackney to West Ham ii. Hackney 132 kV substation. 						
Constraints							
Flood Risk	<p>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.</p>						
	 <p>© Crown Copyright and database right (2016). Ordnance Survey 100021551.</p>						
	<p>Key</p> <table border="0"> <tr> <td> Flood Zone 3</td> <td> Areas Benefiting from Flood Defences</td> </tr> <tr> <td> Flood Zone 2</td> <td> Flood Storage Areas</td> </tr> <tr> <td> Defences</td> <td> Proposed Areas</td> </tr> </table> <p>Copyright © and Database rights Environment Agency 2010. All rights reserved. Some of the information within the Flood Map is based in part on digital spatial data licensed from the Centre for Ecology and Hydrology © NERC.</p>	 Flood Zone 3	 Areas Benefiting from Flood Defences	 Flood Zone 2	 Flood Storage Areas	 Defences	 Proposed Areas
 Flood Zone 3	 Areas Benefiting from Flood Defences						
 Flood Zone 2	 Flood Storage Areas						
 Defences	 Proposed Areas						

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	<p>There are three Grade II listed buildings adjacent to the west of site:</p> <ul style="list-style-type: none"> • Hackney Borough Disinfecting Station (on Heritage at Risk Register) • Shelter House • Caretakers Lodge <p>The Mandeville Primary School which is Grade II listed is situated to the south of the area.</p> <p>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.</p> <p>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.</p>
Highways	<p>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.</p> <p>Routing arrangements for HGV traffic should be considered as part of any future planning applications.</p>
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	<p>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.</p> <p>Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the area are therefore likely to be important mitigation measures.</p> <p>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.</p> <p>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.</p> <p>An appraisal to assess impact of new structures on the historic environment will be required. Building design should be sympathetic to the historic setting.</p>
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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

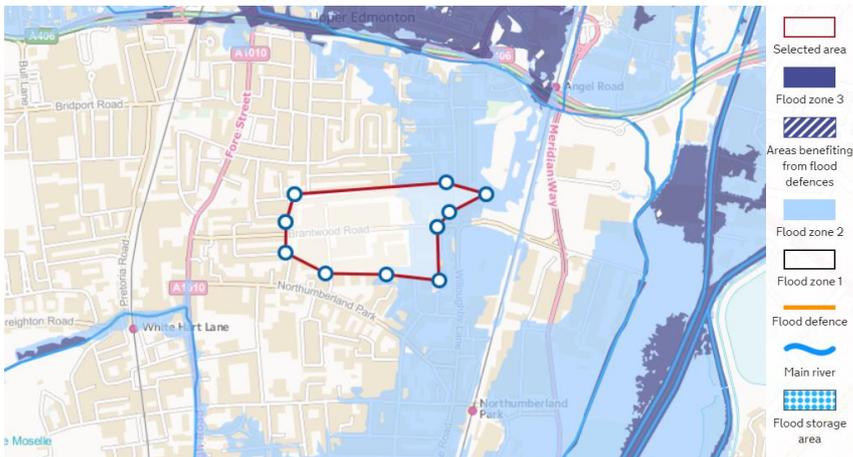
Borough	Haringey
Type of Location	Area
Location Reference	A19-HR – Brantwood Road
Size	16.90 ha
Area Description	Industrial Estate
Description of surrounding uses	The Industrial Estate is surrounded by residential properties on all sides as well as a sports field to the east and industrial land to the north east.

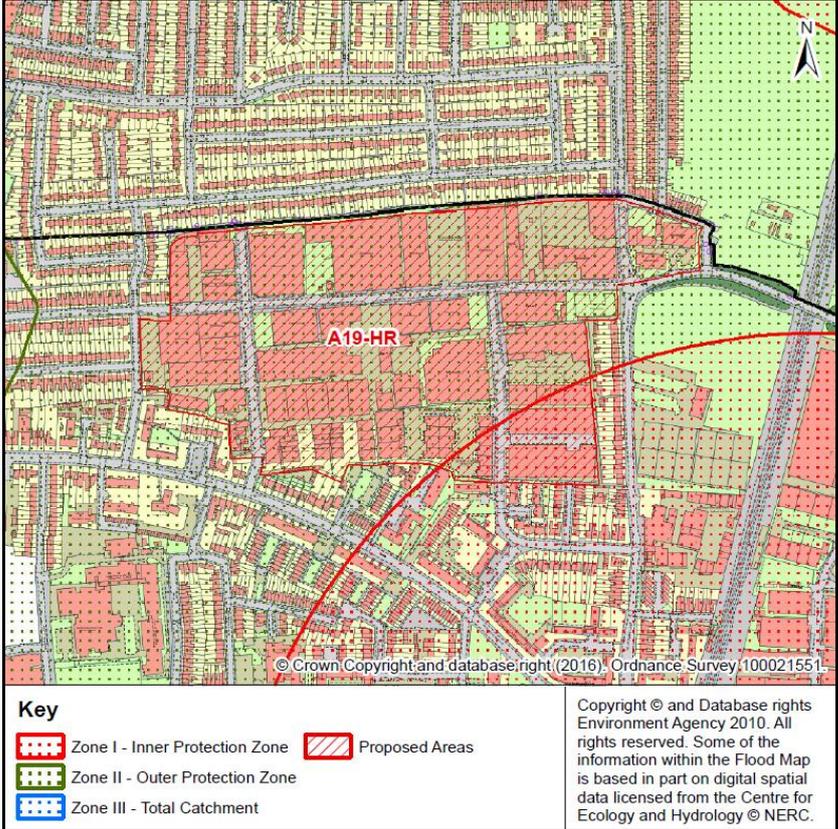
Planning Information

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 Haringey'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

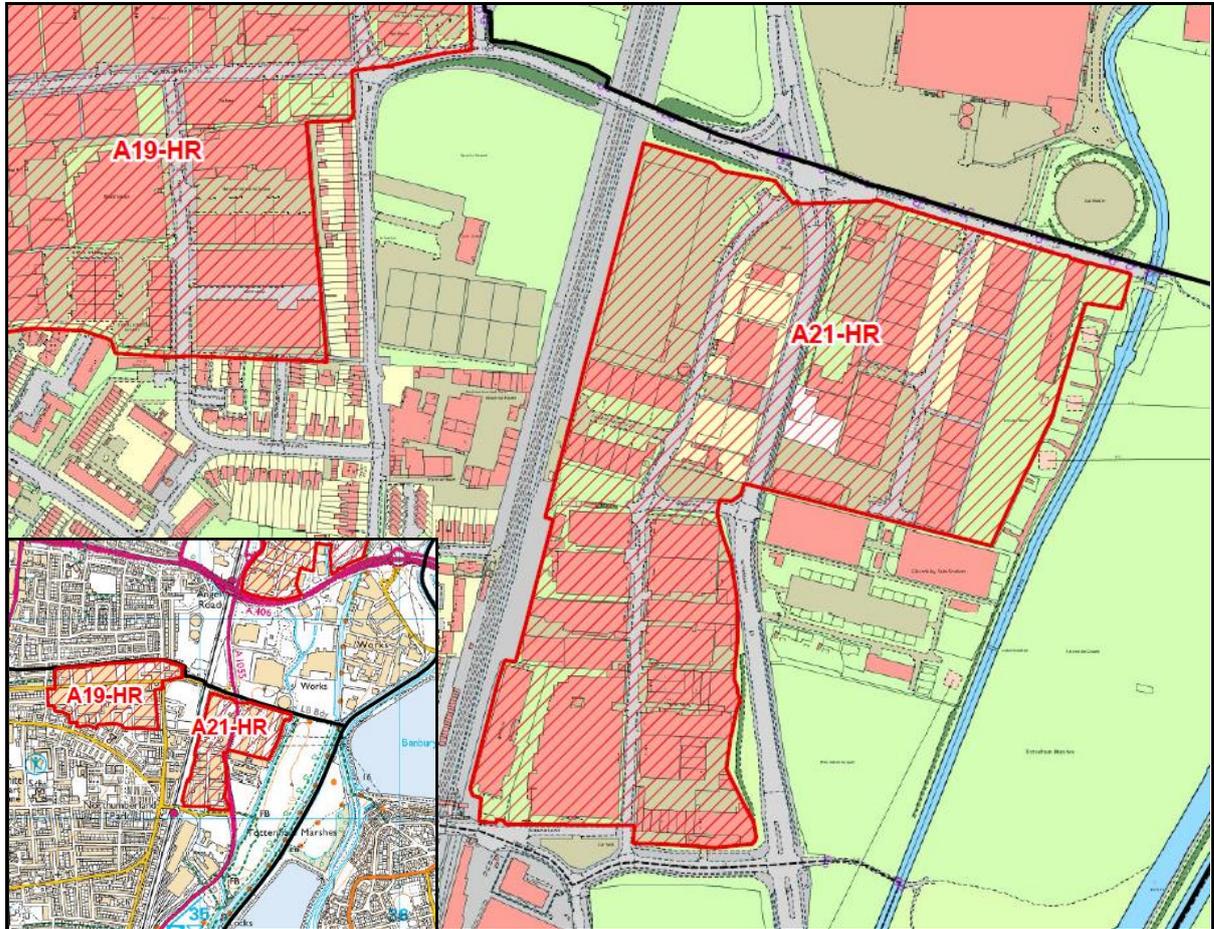
	<p>Housing Zone as set out within the London Plan. Transport for London has identified the area as lying in close proximity to a proposed Crossrail 2 station.</p>
<p>Decentralised Energy Network</p>	<p>The proposed Upper Lee Valley potential Decentralised Heating Network runs through the area. To the north east of the area is the potential Enfield decentralised energy network.</p>
<p>Details of in-situ infrastructure</p>	<p>None identified</p>
<p>Constraints</p>	
<p>Flood Risk</p>	<p>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.</p> <p>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.</p> <p>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.</p> 
<p>Surface and Groundwater</p>	<p>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.</p>

	
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	<p>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.</p> <p>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.</p> <p>As proposals may increase the level of traffic generated within the area a traffic impact assessment will be a key mitigation measure.</p>
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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)

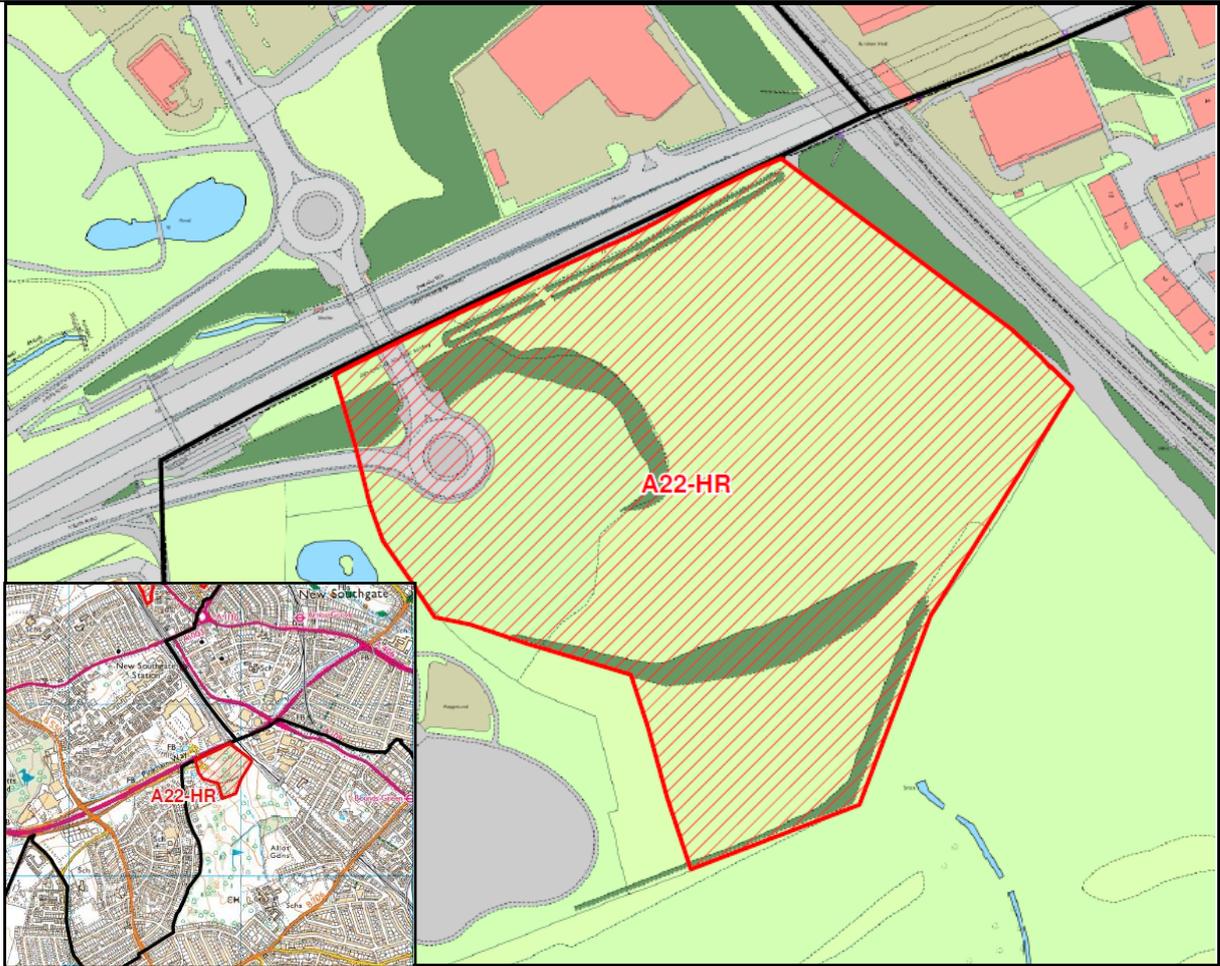


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Area Details

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)

Highways	<p>Access is suitable for HGV traffic. However, there are known congestion issues at the Leaside Road/Watermead Way junction at peak periods.</p> <p>The area is considered suitable but details of access and egress would need to be considered as part of any future development proposals.</p>
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 unlikely to be suitable for hazardous waste.
General mitigation measures	<p>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.</p> <p>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.</p>

A22-HR – Friern Barnet Sewage Works (LEA 4) /Pinkham Way, Haringey


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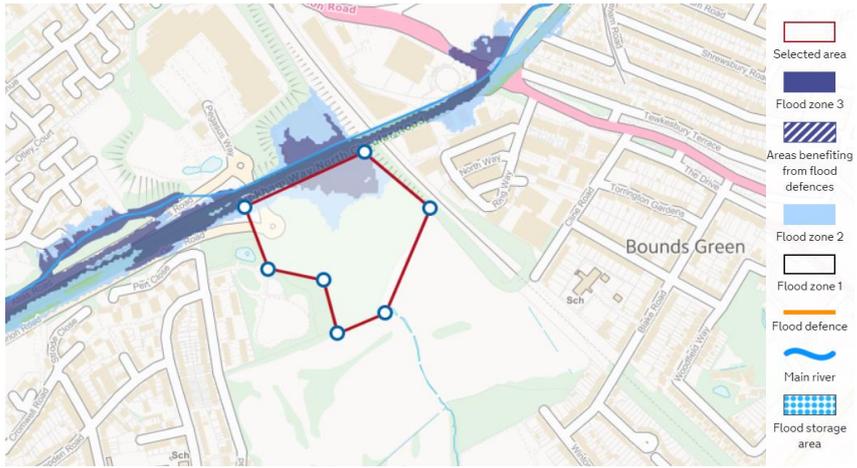
Area Details

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.
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Relevant Local Plan Policy	<p>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).</p> <p>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</p>
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	<p>The Enfield potential Decentralised Energy area lies approximately 65m northeast of Friern Barnet.</p> <p>Not considered to be a practical option due to distance from potential users.</p> <p>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.</p>
Details of in-situ infrastructure	None identified
Constraints	
Flood Risk	<p>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.</p> <p>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.</p> <p>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.</p>

	
<p>Surface and Groundwater</p>	<p>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.</p>
<p>Land Instability</p>	<p>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.</p>
<p>Sensitive Receptors (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)</p>	<p>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.</p>
<p>Nature Conservation</p>	<p>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.</p>
<p>Green Belt and Open Space</p>	<p>Land adjacent to the south and west of the area is designated as Metropolitan Open Land.</p>
<p>Historic Environment</p>	<p>No features identified</p>

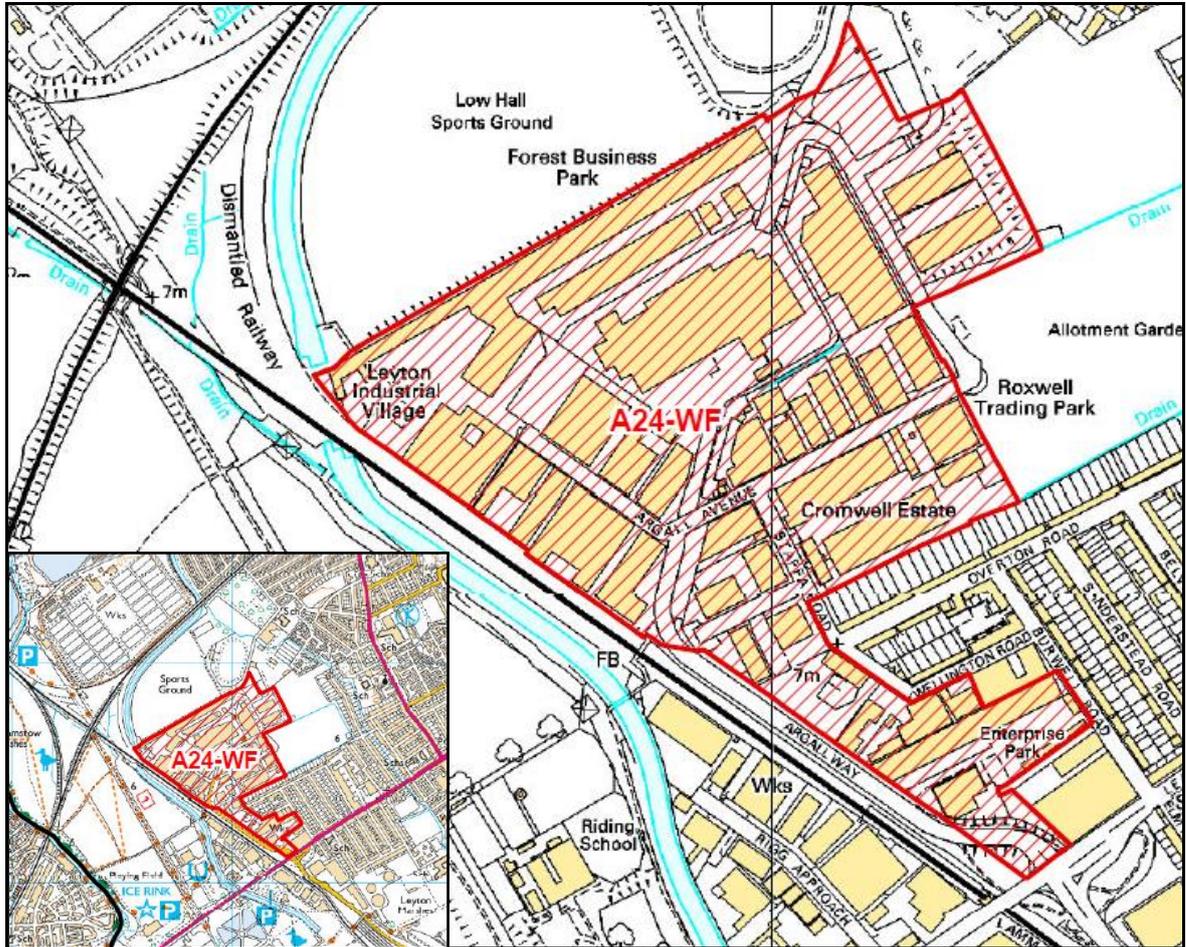
Highways	The Area would require the creation of an access to the roundabout on Orion Road/Pegasus Way. This would need to be designed to allow HGVs and refuse vehicles. The existing roundabout is suitable for these movements. Access to the North Circular is relatively easy from either Orion Road [heading 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	<p>The Area covers land owned separately by the North London Waste Authority and the London Borough of Barnet.</p> <p>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 SINIC.</p> <p>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</p> <p>Given the constraints on the Area, the site footprint should be minimised, taking into account the necessary operational</p>

	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>
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	<p>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.</p> <p>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.</p> <p>Provision of an acceptable access of from Orion Road Roundabout would be required.</p> <p>Any application should demonstrate how public access to the remainder of the Area could be achieved.</p> <p>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.</p> <p>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.</p> <p>A contamination and ground stability appraisal would be required to assess potential impacts from the historic landfill within the Area boundary.</p> <p>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.</p>
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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

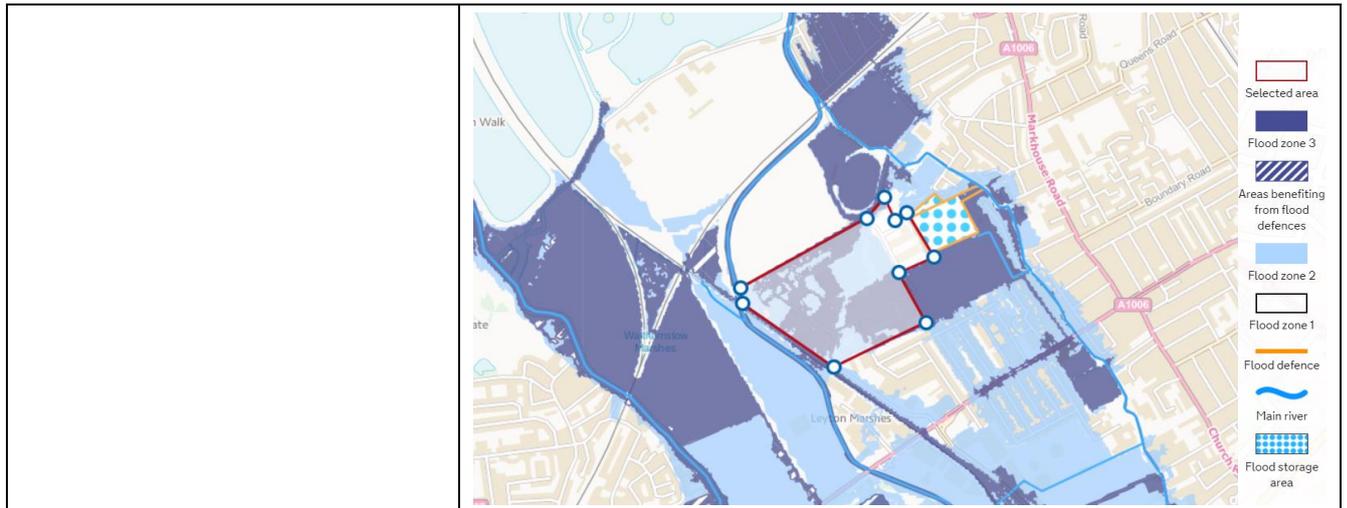
Borough	Waltham Forest
Type of Location	Area
Location Reference	A24-WF – Argall Avenue
Size	26.80 ha
Area Description	The area is an Industrial Estate.
Description of surrounding uses	There is a sports ground to the north, Lea Valley Park, allotments and residential properties to the east, industrial 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.
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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: <ul style="list-style-type: none"> 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	

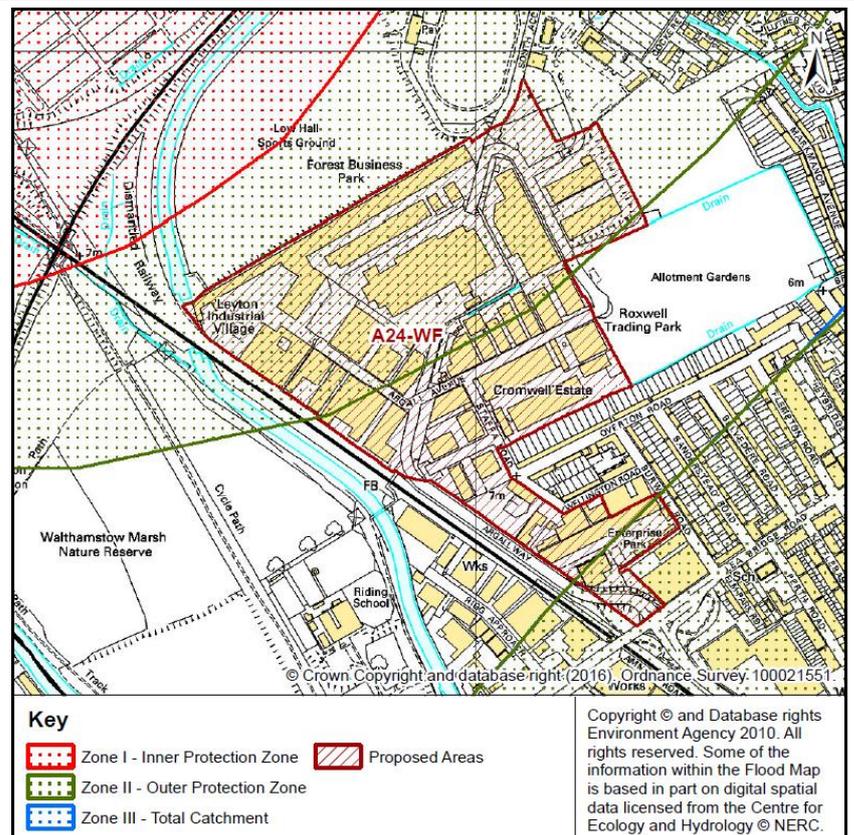
Flood Risk	<p>The site area falls partially within Flood Zone 1, Flood Zone 2 and Flood Zone 3. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.</p> <p>However, development should be avoided on the part of the site area which lies within the functional floodplain.</p> <p>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.</p> <p>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.</p> <p>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.</p>
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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.

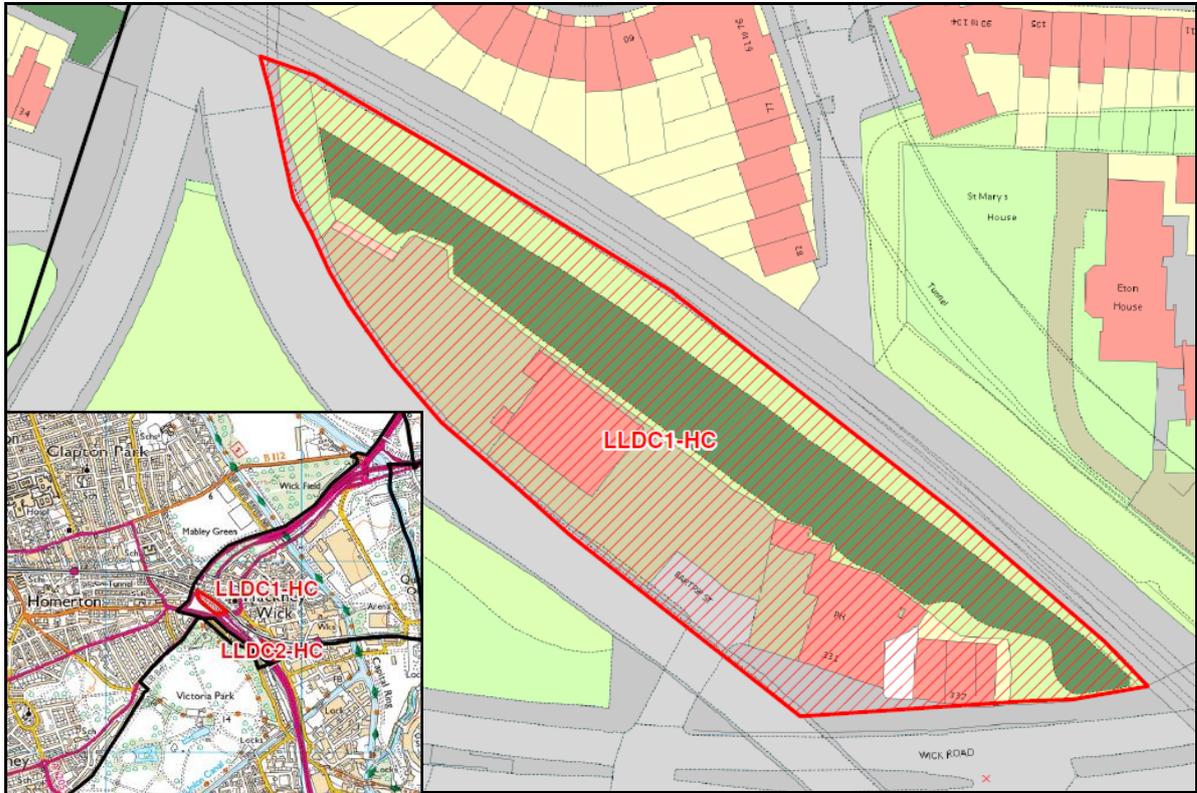
There is a potential for stability issues however Argall Avenue is completely developed which suggests any issue can be addressed. Further investigation will be required at the planning application stage.

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	<p>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.</p> <p>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.</p> <p>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</p>

	<p>water runoff will be key mitigation measures. Appropriate measures should also be incorporated to prevent any contamination of groundwater or adjacent watercourses.</p> <p>As the area has poor air quality an air quality impact assessment will be a key mitigation measure.</p>
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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

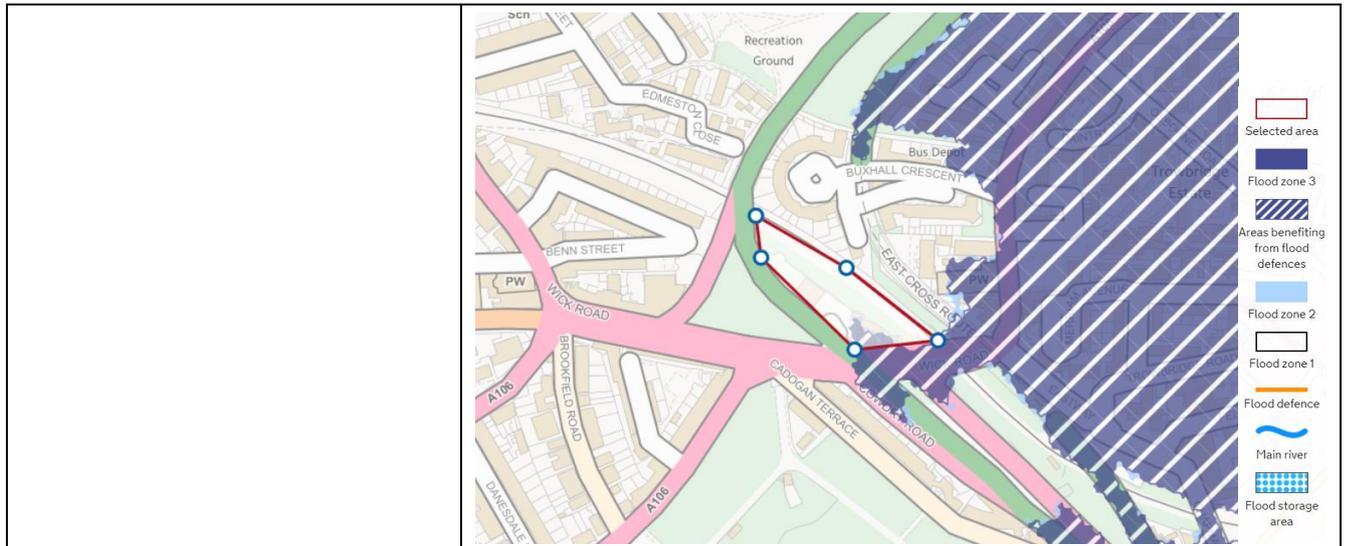
Borough	Hackney
Type of Location	Area
Location Reference	LLDC1-HC – Bartip Street LSIS
Size	0.60 ha
Area Description	Area contains small scale industrial, storage and distribution uses and residential
Description of surrounding uses	The area is bound on all sides by road and railway lines. There is some 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 Legacy 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	<p>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.</p> <p>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.</p> <p>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.</p> <p>Part of the site area benefits from existing flood defences.</p>



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.



Key	
	Zone I - Inner Protection Zone
	Zone II - Outer Protection Zone
	Zone III - Total Catchment
	Proposed Areas

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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

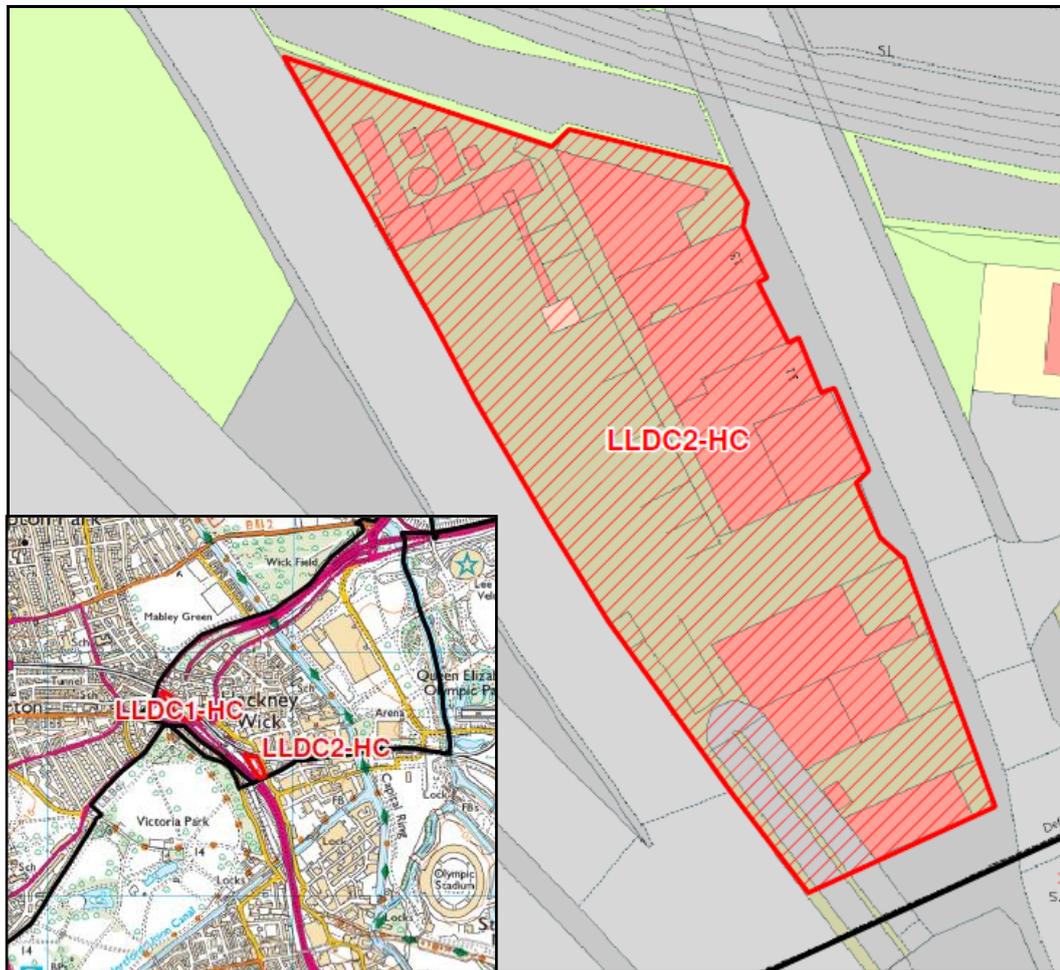
No features identified

Green Belt and Open Space	Metropolitan Open Land lies 100m to the north of the area.
Historic Environment	<p>Four listed buildings lie to the north east within 100m of the area:</p> <ul style="list-style-type: none"> • 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. <p>Historic England has noted that the setting of Victoria Park Registered Park and Garden and Conservation Area to the south should be considered.</p>
Highways	<p>The A12 is associated with significant air pollution. An air quality impact assessment would be required as part of any future planning application.</p> <p>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.</p>
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	<p>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.</p> <p>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</p> <p>An appraisal to assess impact of new structures on the historic environment will be required. Building design should be sympathetic to the historic setting.</p>

	<p>As proposals may increase the level of traffic generated within the area an air quality impact assessment will be a key mitigation measure.</p>
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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)



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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.

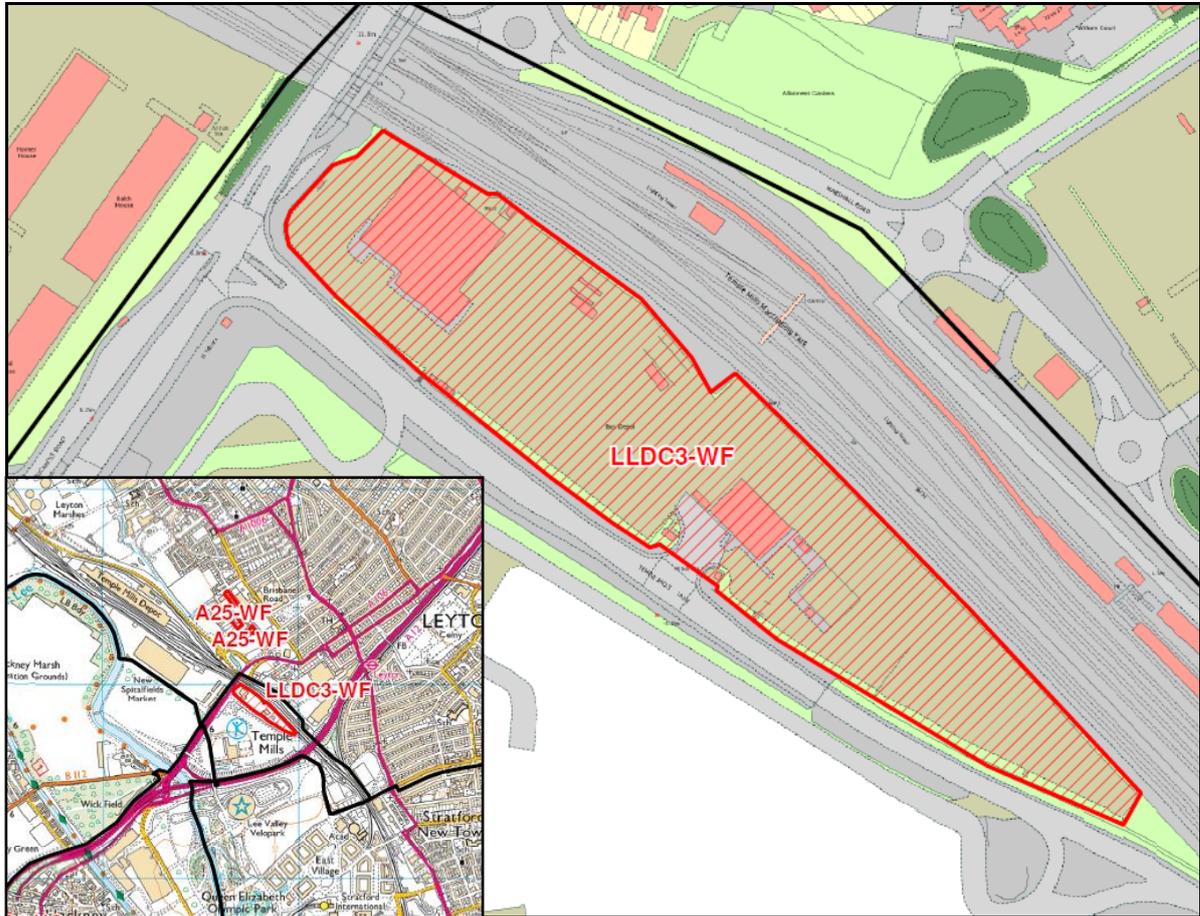
Planning Information	
Planning Designation	Area is designated as a Locally Significant Industrial Site (LSIS)
Relevant Local Plan Policy	Policy B.1, London Legacy DC Local Plan Policy IN.2 London Legacy DC Local Plan
Land Use	
Co-location	No the area is too small to contain more than one use.
Major New 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	<p>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.</p> <p>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.</p> <p>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.</p> <p>The majority of the site area benefits from existing flood defence.</p>

	
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	<p>Victoria Park Conservation Area lies 75m east and 140m west of the area.</p> <p>Historic England has commented that the sensitivity of Victoria Park Conservation Area and Registered Historic Park and Garden setting should be considered.</p>
Highways	<p>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.</p> <p>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.</p>
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

	<p>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.</p> <p>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.</p> <p>An appraisal to assess impact of new structures on the historic environment will be required. Building design should be sympathetic to the historic setting.</p> <p>As proposals may increase the level of traffic generated within the area an air quality impact assessment will be a key mitigation measure.</p>
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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)

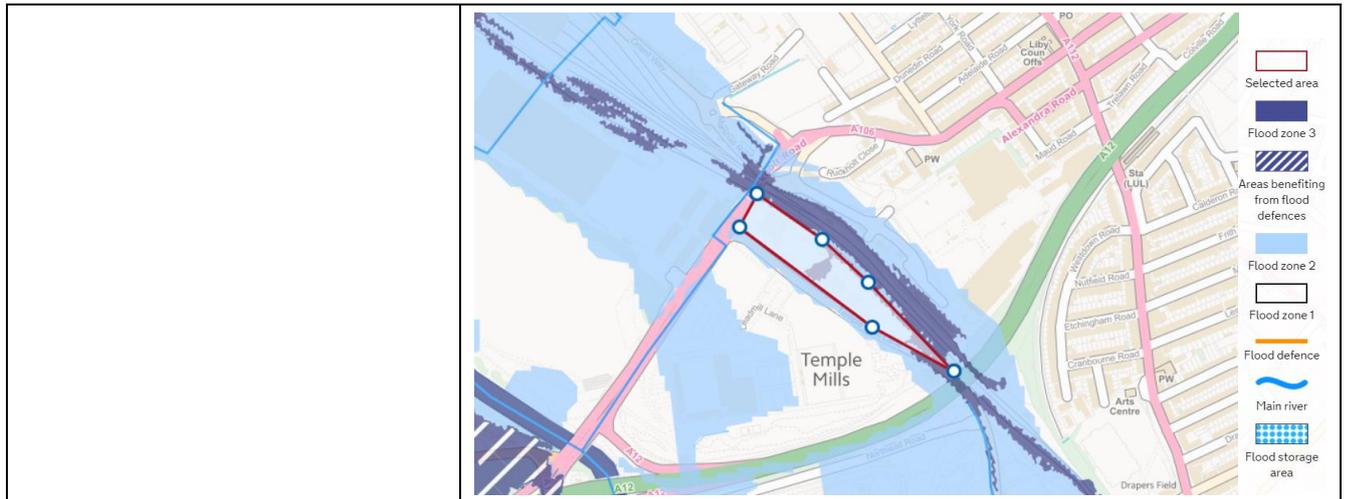


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Area Details

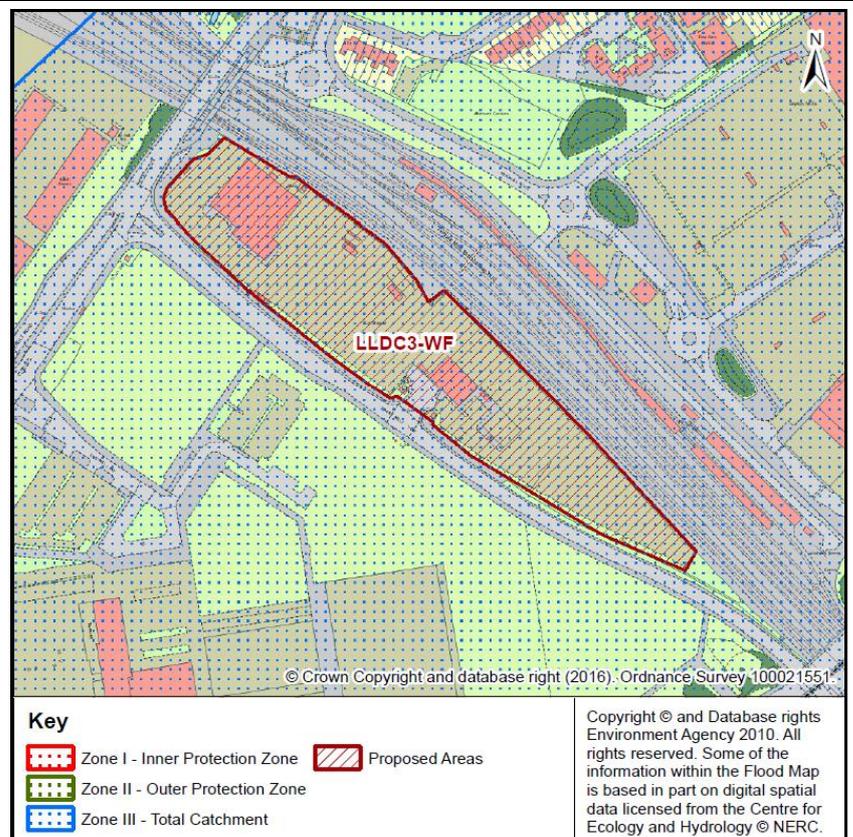
Borough	Waltham Forest
Type of Location	Area
Location Reference	LLDC3-WF – Bus Depot, Temple Mills Lane
Size	2.1 ha
Area Description	Bus Depot
Description of surrounding uses	Railway lines border the north and east of the area with residential properties, allotments and retail beyond, Easton Park and 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	<p>The site area is largely Flood Zone 2 with a small area of 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.</p> <p>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.</p> <p>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.</p> <p>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.</p>



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	<p>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.</p> <p>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.</p> <p>As proposals may increase the level of traffic generated within the area an air quality impact assessment will be a key mitigation measure.</p>

Sustainability Appraisal

January 2019

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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.

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. **Arabic**

Bengali এই দলিলাটি (ডকুমেন্ট) 'নর্থ লন্ডন ওয়েস্ট প্ল্যান' এর একটি অংশ। উক্ত দলিলাটির অনুবাদের জন্য যদি আপনার কোন সহায়তার দরকার হয়, তাহলে দয়া করে এই বাস্তবিকিতে 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 Αυτό το έγγραφο είναι μέρος, του Σχεδίου Αποβλήτων του Βορείου Λονδίνου στην εκθεση ζητημάτων και επιλο-γων του σχεδίου. Αν χρειάζεστε βοήθεια με την μεταφραση του, παρακαλώ 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 ਨੋਰਥ 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.

یہ دستاویز نارنہ 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 دہنے گئے ایڈریس پر واپس بھیج دیں۔

Urdu

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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 Guidance¹ 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 Regulations³ 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
<p>Biodiversity, Flora and Fauna</p> <ul style="list-style-type: none"> • 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. 	<p>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).</p>
<p>Population and Human Health</p> <ul style="list-style-type: none"> • 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 	<p>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).</p>

Key Messages	Policies, Plans and Programmes
<p>on the health and well being of local communities is minimised.</p> <ul style="list-style-type: none"> • Avoid adverse impacts on human health arising from the transport of wastes. 	
<p>Soil</p> <ul style="list-style-type: none"> • Prioritise the use of previously developed land. • Avoid ground pollution and seek to reduce land contamination. 	<p>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.</p>
<p>Water</p> <ul style="list-style-type: none"> • 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. 	<p>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.</p>
<p>Air</p> <ul style="list-style-type: none"> • 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. 	<p>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)</p>
<p>Climate</p> <ul style="list-style-type: none"> • 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. 	<p>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).</p>
<p>Transport</p> <ul style="list-style-type: none"> • 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 	<p>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</p>

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 Strategy (2018).
Material Assets <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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 statistics⁴ 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 CO₂ 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 CO₂ 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 CO₂ 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 CO₂ 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 London⁵.

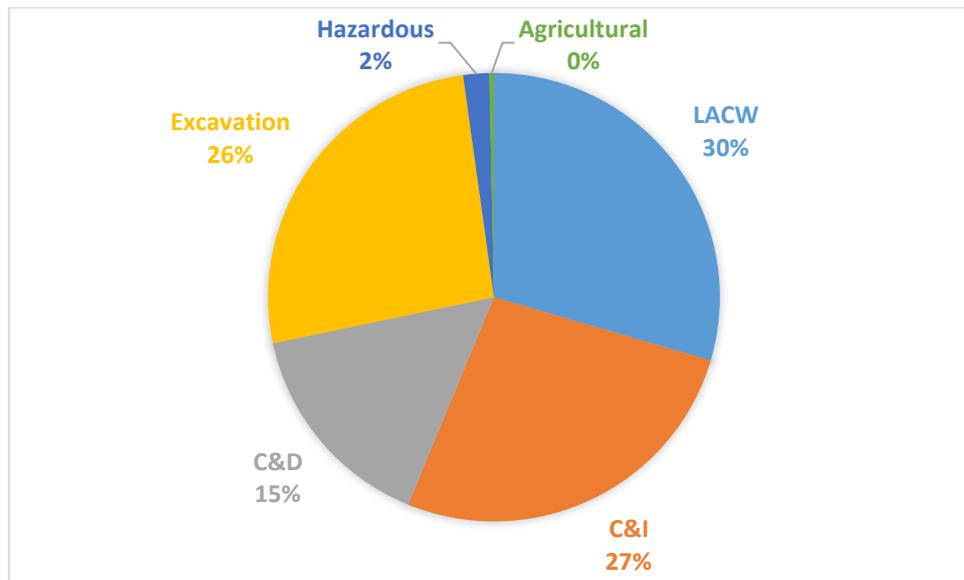
Table 4: Amount of Waste Generated in North London, 2018

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 2016/17⁶. 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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
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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 Report⁸ 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 Study⁹ 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 2016/17¹⁰. 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-sufficiency¹¹ 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 to 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 of 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

<p>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</p>

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 <i>practicable</i> 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.	<p>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?</p> <p>Will it redress environmental inequalities within the plan area?</p>	<p>Number of substantiated complaints to North London Borough's relating to waste development nuisances (noise, dust, light, vermin and odour).</p> <p>Number of fly tipping incidents in the Plan area.</p>
2. To maintain green infrastructure and open space	<p>Will the plan/proposal support the creation of healthier lifestyles through, for example, the provision of new or improved open space?</p> <p>Will it have an adverse impact on the green infrastructure network?</p> <p>Will it lead to a loss of open space / reduction in public access?</p>	<p>Net area of open space and green space permanently lost/created in North London as a result of new waste management facilities.</p>

SA Objective	Decision-Making Criteria	Indicators
<p>3. To promote sustainable modes of transport, reduce the need to travel and improve choice and use of more sustainable transport modes.</p>	<p>Will the plan/proposal reduce overall transport distances for waste?</p> <p>Will it reduce waste-related car and lorry traffic and increase sustainable transport use?</p> <p>Will it reduce/increase road congestion?</p>	<p>Number of permitted sites that use alternative means of transport other than road.</p> <p>Amount of waste transported by rail/water.</p> <p>Waste exported, imported and dealt with within Plan area.</p> <p>Percentage of waste transported by road, rail and water</p> <p>Tonne miles of waste that are transported by road, rail and water</p>
<p>4. To conserve and enhance the historic environment, heritage assets and their settings.</p>	<p>Will the plan/proposal have an adverse impact upon heritage assets and/or their setting?</p>	<p>Number of designated heritage assets (including conservation areas, listed buildings, SAMs and registered parks and gardens) adversely affected by waste development.</p>
<p>5. To maintain and enhance the quality and character of North London's townscapes and landscapes.</p>	<p>Will the plan/proposal have an adverse impact on local landscape character or on townscapes?</p> <p>Will it have an adverse affect on the openness of the Green Belt?</p> <p>Will it affect areas of public open space?</p> <p>Will it lead to landscape/townscape improvements?</p> <p>Will it result in development that is sympathetic to its surroundings?</p>	<p>Number of permitted sites judged to have an adverse impact on local landscape character/conservation areas.</p> <p>Number of permitted sites resulting in the redevelopment of a vacant or derelict site.</p> <p>Area of Green Belt lost to waste development.</p> <p>Area of open space lost to waste development.</p>
<p>6. To maintain, protect and enhance biodiversity, protected species, habitats, geodiversity and features of geological interest.</p>	<p>Will the plan/proposal have an adverse impact upon protected sites or species?</p> <p>Will it restore or create new habitat?</p> <p>Will it lead to the loss of, or impact on the integrity of, BAP habitats or species?</p>	<p>Number, total area and condition of internationally and nationally designated sites (SSSIs, SPAs, SACs, Ramsar) and those of local importance (SINCs, LNRs).</p> <p>Area of new habitat created through waste planning applications/restoration</p>

SA Objective	Decision-Making Criteria	Indicators
		<p>schemes.</p> <p>Change in priority habitats and population of local Biodiversity Action Plan (BAP) species.</p> <p>Area of UKBAP and LBAP habitats created as part of waste development.</p>
7. To reduce and manage flood risk	<p>Will the plan/proposal help to avoid inappropriate development in areas at risk of flooding?</p> <p>Will it exacerbate vulnerability to flooding?</p> <p>Will the plan reduce flood risk through the use of SUDS?</p> <p>Will the plan involve the reconfiguration of existing sites or development of a flood alleviation scheme?</p>	<p>Number of waste facilities development within EA Flood Zones 2 and 3 and within Critical Drainage Areas/Local Flood Risk Zones.</p> <p>Number of sites permitted against Environment Agency flood advice.</p> <p>Number of schemes incorporating Sustainable Drainage Schemes (SuDS).</p>
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.	<p>Will the plan/proposal increase emissions of greenhouse gases from waste activities?</p> <p>Will it reduce emissions of greenhouse gases?</p> <p>Will it encourage the use and/or production of renewable energy?</p> <p>Will it reduce waste-related car and lorry traffic and increase sustainable transport use?</p>	<p>Number of facilities generating energy from waste.</p> <p>Average distance travelled by LACW for treatment/disposal.</p> <p>Number of permitted sites that include renewable energy generation technologies.</p> <p>The number and capacity of Combined Heat and Power (CHP) facilities.</p>
10. To protect and improve air quality, water quality and soils.	<p>Will the plan/proposal have an adverse impact on air quality?</p> <p>Will it reduce/increase road congestion?</p> <p>Will the plan/proposal have an adverse impact on surface or ground water quality?</p>	<p>Location and area of Air Quality Management Areas.</p> <p>Number of days when air pollution is moderate or higher.</p> <p>Number of days when the air quality threshold value of PM₁₀ is exceeded.</p>

SA Objective	Decision-Making Criteria	Indicators
	<p>Will it improve existing water quality?</p> <p>Will the plan/proposal support the remediation of contaminated land?</p> <p>Will it have an adverse impact on soil quality?</p>	<p>Quality of local watercourses.</p> <p>Number of sites permitted within groundwater protection zones.</p> <p>Number and area of contaminated sites remediated as a consequence of waste-related development</p> <p>Number of sites permitted in areas of worsening air quality</p>
<p>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.</p>	<p>Will the plan/proposal minimise the production of waste?</p> <p>Will it promote sustainable waste management and encourage movement of waste up the Waste Hierarchy?</p>	<p>Annual waste arisings by type.</p> <p>Estimated permitted treatment and disposal capacity in North London.</p> <p>The quantity of new capacity added at each level of the Waste Hierarchy</p> <p>Average distance travelled by LACW for treatment/disposal.</p> <p>Waste dealt with within the Plan area</p> <p>Volume and % of waste disposed to landfill by waste stream.</p>
<p>12.To ensure the efficient use of land and natural resources and the sustainable management of existing resources.</p>	<p>Will the plan/proposal make use of previous developed land or buildings?</p> <p>Will it increase demand for water?</p> <p>Will it incorporate/encourage measures to ensure water is used efficiently?</p>	<p>Proportion of new waste development on previously developed land.</p> <p>Proportion of existing and new waste developments with water efficiency measures.</p>
<p>13.To encourage sustainable economic growth, exploit the growth potential of business sectors and improve the competitiveness and productivity of the local waste industry</p>	<p>Will the plan/proposal encourage sustainable economic growth through provision of adequate waste management facilities?</p> <p>Will the plan/proposal diversify the economy in terms of the waste management sector?</p>	<p>Economic output of Gross Value Added (GVA) per capita per annum</p> <p>Number of new jobs created by new waste sites.</p> <p>Annual waste arisings by type.</p>

SA Objective	Decision-Making Criteria	Indicators
	<p>Will it enable new and innovative waste management technologies to be developed and utilised?</p> <p>Will it enable maximum value recovery from waste where possible?</p> <p>Will it promote waste minimisation?</p>	<p>Capacity of new waste management facilities by type.</p> <p>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.</p>
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.



Equality Impact Assessment

January 2019



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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.

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. **Arabic**

Bengali এই দলিলাটি (ডকুমেন্ট) 'নর্থ লন্ডন ওয়েস্ট প্ল্যান' এর একটি অংশ। উক্ত দলিলাটির 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 Αυτό το έγγραφο είναι μέρος, του Σχεδίου Αποβλήτων του Βορείου Λονδίνου στην εκθεση ζητημάτων και επιλο-γων του σχεδίου. Αν χρειάζεστε βοήθεια με την μεταφραση του, παρακαλώ 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 ਨੋਰਥ 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 ਫਾਰਮ 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.

یہ دستاویز نارنہ 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 دہنے گئے ایڈریس پر واپس بھیج دیں۔

Urdu

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Name_____	Return to:
Address_____	Archie Onslow
_____	North London Waste Plan
_____	Regeneration & Planning
	Camden Town Hall
	Judd Street
	London WC1H 9JE

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:

Name:

Duncan McCorquodale

Position:

Associate Planning Consultant

Email:

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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 identified 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 2010¹. 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 website².

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 sites 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 statistics³ 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 country⁴. 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 proportions⁵.

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 group⁶.

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 2012-2014⁷. 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-2017⁹. 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 averages¹⁰.

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 the 16-64 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 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	<p>No</p> <p>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.</p> <p>Waste facilities can also provide employment opportunities both during construction and operation phase, which may be beneficial to all target groups in all Boroughs.</p> <p>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.</p>	No	N/A
Gender (including gender reassignment)	<p>No</p> <p>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.</p> <p>Waste facilities can also provide employment opportunities both during construction and operation phase, which may be beneficial to all target groups in all Boroughs.</p> <p>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.</p>	No	N/A

Sexual Orientation	<p>No</p> <p>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.</p> <p>Waste facilities can also provide employment opportunities both during construction and operation phase, which may be beneficial to all target groups in all Boroughs.</p> <p>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.</p>	<p>No</p>	<p>N/A</p>
Religion and Belief	<p>No</p> <p>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.</p> <p>Waste facilities can also provide employment opportunities both during construction and operation phase, which may be beneficial to all target groups in all Boroughs.</p> <p>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.</p>	<p>No</p>	<p>N/A</p>

<p>Age</p>	<p>No</p> <p>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.</p> <p>Waste facilities can also provide employment opportunities both during construction and operation phase, which may be beneficial to all target groups in all Boroughs.</p> <p>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.</p>	<p>No</p>	<p>N/A</p>
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Socio-economic	<p>No</p> <p>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.</p> <p>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.</p> <p>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.</p>	No	N/A
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<p>People who are pregnant or subject to maternity legislation</p>	<p>No</p> <p>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.</p> <p>Waste facilities can also provide employment opportunities both during construction and operation phase, which may be beneficial to all target groups in all Boroughs</p> <p>Sustainability Objective 10 relates to protecting improving air, water and soil quality which may have particular benefits for pregnant members of the community.</p> <p>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.</p>	<p>No</p>	<p>N/A</p>
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<p>People with dependents and caring responsibilities</p>	<p>No</p> <p>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.</p> <p>Waste facilities can also provide employment opportunities both during construction and operation phase, which may be beneficial to all target groups in all Boroughs.</p> <p>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.</p>	<p>No</p>	<p>N/A</p>
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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 examination¹. 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 EqlA produced in support of the submitted NLWP together with this EqlA 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 (EqlA) 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 EqlA 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 EqlA 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 EqIA² [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 document³ produced in January 2019.

3.2 As a result of the consultations undertaken at the regulation⁴ 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 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 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uksi/2012/2700/contents/part-1/section-18)

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 EqlA 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 amended⁵ 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 waste⁶. 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 report⁸, 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 \(www.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-for-waste)

⁷ [Waste - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/waste)

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 website⁹.

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 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 assessment¹⁰ 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 HRA¹¹ assessed the subsequent Main Modifications and found that they do not have any implications for the HRA. As noted by the Inspector in his report¹², "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 \(nlwp.net\)](https://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 Enfield¹⁶. The MMs considered by the Inspector in his report¹⁷ 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 Main 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 EqlA 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 states¹⁸ 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 Inspector¹⁹ 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 Inspector²⁰ 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 Inspector²¹ 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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MINUTES OF THE STRATEGIC PLANNING COMMITTEE MEETING HELD ON TUESDAY, 14 JUNE 2022, 7PM – 8.30PM

COUNCILLORS: Barbara Blake (chair), Rice (vice-chair), Bevan, Bartlett, Buxton, Cawley-Harrison, Dunstall, Ovat, Say, White.

Also present: Councillor Carlin (Cabinet Member for Housing Services, Private Renters, and Planning), Rob Krzyszowski (Assistant Director of Planning, Building Standards, and Sustainability), Robbie McNaugher (Head of Development Management, and Enforcement), Bryce Tudball (Interim Head of Planning, Policy, Transport, and Infrastructure), Bob McIver (Head of Building Control Services), Justin Farely (Legal), Jack Booth (Principal Committee Co-ordinator).

1. FILMING AT MEETINGS

The Chair referred to the notice of filming at meetings, this information was noted.

2. APOLOGIES

Apologies for absence were received from Councillor Worrell.

3. DECLARATIONS OF INTEREST

There were no declarations of interest.

4. URGENT BUSINESS

There were no items of urgent business.

5. DEPUTATIONS / PETITIONS / PRESENTATIONS / QUESTIONS

There were no deputations.

6. MINUTES

RESOLVED

To confirm and sign the minutes of the Strategic Planning Committee meetings held on 27 May 2021, 31 January 2022, and 23 May 2022 as a correct record.

7. ADOPTION OF THE NORTH LONDON WASTE PLAN

The chair introduced the item. She informed the committee that Councillor Carlin, Cabinet Member for Housing Services, Private Renters and Planning, wanted to make a comment on the item, as the plan came under her portfolio.

The Cabinet Member for Housing Services, Private Renters and Planning said that the plan before the committee had a long genesis. It had gone through substantial amendments following extensive consultation with residents and interested groups. The plan had also been reviewed by a Planning Inspector appointed by

the Secretary of State who had judged the plans to be sound. The primary changes were the redrawn site for Pinkham Way and the need for biodiversity on the sites. The plan had recycling at its core, which was a priority for the council.

The chair invited the Assistant Director of Planning, Building Standards, and Sustainability and the Interim Head of Planning, Policy, Transport, and Infrastructure to introduce the report.

The Interim Head of Planning, Policy, Transport, and Infrastructure highlighted that the item concerned the adoption of the North London Waste Plan (NLWP), the committee were asked to recommend it to cabinet with any comments. The following was outlined from the plan:

- The NLWP was a plan that:
 - o Covered seven boroughs;
 - o Planned for waste for the next 15 years;
 - o Identifies areas for potential waste management use; and
 - o Sets out policies for waste planning applications.
- The differences between the NLWP and the North London Waste Authority (NLWA) were demarcated. The central difference being that the latter was an authority, with its own governance structures. The NLWP was not an authority, it was a badge for a joint project across seven London boroughs;
- Timescales and community engagement:
 - o 2012 original NLWP deemed unsound;
 - o February 2012 cabinet agree new NLWP;
 - o 2013-14 community engagement;
 - o July 2015 cabinet approves the plan after formal consultation;
 - o January 2019 approved by cabinet and full council;
 - o November 2019 examination hearings;
 - o Modifications in response to community input;
 - o October – December 2020 community consultation on modifications;
 - o October 2021 Planning Inspector found the plan to be legally compliant, considering it to be sound;
 - o Seven councils to adopt plan, four already have done so;
 - o The plan currently at the final stage;
- Area allocations:
 - o Pinkham Way/ Friern Barnet Sewage Works. Significant modifications had been made to this site after community consultation. The Planning Inspector had found the plan to be sound; and
 - o Brantwood Road and North-East Tottenham. Both sites were designated as Strategic Industrial Locations. Therefore, they were already suitable for waste disposal.
 - o None of the above areas had been identified as suitable to contain integrated resource recovery facilities, such as an incinerator;
- The importance of the NLWP
 - o Ensure the sustainable and self-sufficient management of waste;
 - o An opportunity to apply environmental controls, while avoiding speculative applications
 - o Would support the production of the new local plan, providing a baseline for waste planning uses over the next 15 years.
- Next steps

- 21 June 2022 to be considered, with comments from Strategic Planning Committees, by cabinet; and
- 18 July 2022 to be adopted by full council.
- Other boroughs
 - The following boroughs had adopted the plan:
 - Barnet;
 - Hackney;
 - Islington; and
 - Waltham Forest.
 - Awaiting approval from:
 - Camden;
 - Enfield; and
 - Haringey.

In response to councillors questions the Assistant Director of Planning, Building Standards, and Sustainability Planning and the Interim Head of Planning, Policy, Transport, and Infrastructure provided the following answers:

The predictions set out in the NLWP were reflecting targets set out by the Greater London Authority's *The London Plan* for waste and those set by the NLWA. Haringey Council planning were not responsible for these targets, which were fed into the plan making process. The council planning authority had responsibility for planning judgements around land allocation. The methodology for these planning judgements were set out in *National Planning Policy for Waste (2014)* which was alongside the *National Planning Policy Framework*. The Planning Inspector had scrutinised these elements in the public hearing, ensuring that the council were not planning for too much or too little waste; concluding that the land allocations based on projections were sound. It was added that the NLWP was a 15-year plan, if targets were to change then the council would have the opportunity to review these targets.

A councillor noted that he was worried by an assessment set out in the Planning Inspector report, at Appendix A, which said that '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'. He was worried by this assessment, as he believed it reflected a lack of ambition within the plan, due to the need to follow policy that had been set by national government. The Assistant Director relayed that where the council as planning authority could shape the direction of NLWP it would be looking to actively tackle climate change. For example, a considerable amount of the plan was centred around minimising transportation frequency.

Brantwood Road and North-East Tottenham were both sites designated as Strategic Industrial Locations. Therefore, they were already suitable for waste disposal. The plan was not proposing to change these designations. The plan gave additional protection to these areas through applying additional environmental policies and controls. There was a specific policy that steered development as far away from residential property as possible. If the plan were not adopted these safeguards would not be part of planning policy.

The area allocation for Brantwood Road and North-East Tottenham was set out at Appendix D, pages 270 and 274. The Brantwood Road allocation covered the following roads:

- Brantwood Road;
- West Road; and
- Tariff Road.

The North-East Tottenham allocation covered the following roads:

- Garman Road;
- Sedge Road;
- Lee Side Road;

Regarding Pinkham Way and the designation as SINC and proposal of public access to the current undeveloped site. The two were not mutually exclusive land uses, often it was possible to have a SINC that was compatible with public access. It was standard practice as it was thought to promote biodiversity. It was important to manage the space in the correct way to ensure compatibility. Two key pieces of evidence for Local Plan were:

- An employment land study. Which would be reported back to the committee at a future date; and
- An updated SINC study, which provided an update on biodiversity across the borough.

There were no specific plans currently about transportation via rail and water, it was referred to in the document in a general sense.

A councillor commented that in the reports pack it said that the aim of NLWP was to 'improve the health of residents and tackle deprivation' across the seven boroughs. It also stated that:

'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.'

Factoring in these considerations would there be opportunity for stricter measures around traffic in this area. The Assistant Director of Planning, Building Standards, and Sustainability said that the traffic impact on this area could be scrutinised fully at a planning stage, where the latest environmental controls would be applied. This would create enhanced controls compared to similar older sites that had not been subject to the same degree of controls. In terms of the deprivation in the area any planning application for the site would have to provide a training and skills obligation. Requirements could be set on this topic to support the local area.

A councillor commented that he was fully supportive of the plan. This was based on the fact that if this plan were rejected, any waste operator could bid for land use in area in Haringey. If the plan were accepted waste operators would be restricted to the land allocations proposed in the NLWP.

The plan had scrutinised adjacent land uses, this had been looked at by an independent Planning Inspector, and planning officers have ensured that effective

safeguards are in place to minimise disruption to existing and new residential developments.

Pinkham Way allocated land had split ownership, NLWA owning the north half and London Borough of Barnet owning the southern half; no part of the allocation falls within metropolitan open land.

NLWP was dealing with policy and future planning applications. The wider issues around targets, the council's relationship with NLWA, and Veolia contracts were not part of the NLWP. These issues would be dealt with by officers concerned with waste disposal in the Environment and Neighbourhoods directorate. In relation to these issues, planning officers would be able to suggest design guidance on waste disposal and minimising disruption to residents. In terms of overall strategic planning policy, concerns around proximity to residents, designing sites to be neighbourhood friendly, and underground waste collection can be factored into the new the Local Plan.

RESOLVED

- a. To note the content of this report and the Inspector's Report on the North London Waste Plan (set out in Appendix A); and
- b. To agree to refer this report, attached with councillors' comments, and the appended documents to cabinet and 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 (Appendix D).

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Overview and Scrutiny

Annual Report 2021/22



Foreword

The Overview and Scrutiny Committee has delivered its work plan for the year in difficult circumstances due to the Covid-19 pandemic and the challenges that emerging from it has presented. Scrutiny has a crucial role in articulating the concerns of the local community and the work plan was therefore based on feedback received from representatives of the community in a series of virtual consultations to determine the issues that were most important to them.

In carrying out our work, we have made sure that the issues raised by the community were followed through and either became reviews, areas of enquiry or individual questions to Cabinet members. We have addressed a wide range of topics including ones that could be challenging or were sometimes difficult to address, led as we have been by a commitment to the independence and vital role of good oversight and transparency.

The Covid-19 pandemic has affected all of us and the Council and its partners face financial and operational challenges arising from it. In addition, there is a severe cost of living crisis that is impacting on the whole community and especially the most vulnerable. We must rise to meet them if we are to adequately support our community through the tough times ahead.

More than ever, scrutiny has a role to play in helping good policy making and bringing the voices of the community forward to make sure we hear them and respond appropriately.

Councillor Khaled Moyeed - Chair, Overview and Scrutiny Committee

Haringey's Overview and Scrutiny Committee 2021/22



Cllr Khaled Moyeed (Chair)



Cllr Pippa Connor
(Vice Chair)



Cllr Dana Carlin



Cllr Makbule Gunes



Cllr Matt White

Co-opted Members:

Church Representatives

- Yvonne Denny
- Lourdes Keever

Parent Governor Representatives

- Anita Jakhu
- Kanupriya Jhunhunwala

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Appendix 1: The functions and service areas covered by scrutiny (2021/22)

1. What is scrutiny?

- 1.1 Overview and Scrutiny was brought into being by the Local Government Act 2000. A requirement of the act is for a local authority with executive arrangements to have one or more overview and scrutiny committees.
- 1.2 These are able to scrutinise the decisions or actions taken by the Council or partner organisations or, indeed, consider any matter that affects people living in the area.
- 1.3 Overview and scrutiny should:
- Provide constructive “critical friend” challenge;
 - Amplify the voices and concerns of the public;
 - Be led by independent people who take responsibility for their role; and
 - Drive improvement in public services.
- 1.4 Overview and Scrutiny plays an important role in local democracy through enhancing local accountability of services, improving transparency of decision-making and enabling Councillors to represent the views of local residents.
- 1.5 The work programme of Overview and Scrutiny is determined by the Councillors that undertake it rather than Council officers or Councillors on the Council’s Cabinet, although they can make suggestions. Suggestions from members of the local community are also very welcome. In addition, consultation exercises have been undertaken by Overview and Scrutiny, including surveys, to identify the issues that matter most to local residents.
- 1.6 The work programme covers a balance of activities:
- Holding the Executive to account;
 - Policy review and development – in-depth reviews to assess the effectiveness of existing policies or to inform the development of new strategies;
 - Performance management – identifying under-performing services, investigating and making recommendations for improvement;
 - External scrutiny – scrutinising and holding to account partners and other local agencies providing key services to the public; and
 - Public and community engagement – engaging and involving local communities in scrutiny activities and scrutinising those issues which are of concern to the local community.
- 1.7 It should also;
- Reflect local needs and priorities;
 - Prioritise issues that have most impact or benefit to residents;
 - Involve local stakeholders; and
 - Is flexible enough to respond to new or urgent issues.

- 1.8 Scrutiny is a flexible process and can be carried out in a variety of ways, using various formats. In accordance with the Scrutiny Protocol, our areas of enquiry have been drawn from the following:
- Performance Reports;
 - One-off reports on matters of national or local interest or concern;
 - Issues arising out of internal and external assessment;
 - Reports on strategies and policies under development;
 - Issues on which Cabinet or officers would like scrutiny views or support; and
 - Progress reports on implementing previous scrutiny recommendations.
- 1.9 In addition, in-depth scrutiny reviews are an important aspect of Overview and Scrutiny and provide opportunities to thoroughly investigate issues and to make recommendations regarding them. Through the gathering and consideration of evidence from a wide range of sources, this type of work enables more robust and effective challenge as well as an increased likelihood of delivering outcomes.
-

2. The structure of scrutiny in Haringey

- 2.1 In Haringey there is one over-arching Overview and Scrutiny Committee. This is supported in its work by four standing scrutiny panels that scrutinise the following service areas:
- Adults and Health;
 - Children and Young People;
 - Environment and Community Safety; and
 - Housing and Regeneration.
- 2.2 The Overview and Scrutiny Committee is responsible for developing an overall scrutiny work programme, including the work done by the four standing panels.

Overview & Scrutiny Committee and Scrutiny Panels

- 2.3 The Overview and Scrutiny Committee is made up of five councillors who are not members of the Council's Cabinet. Membership of Overview & Scrutiny Committee is proportional to the overall political makeup of the Council. The scrutiny panels are made up of between 3 and 7 councillors who are also not members of the Cabinet. Scrutiny panels are chaired by members of the Overview and Scrutiny Committee and membership is, as far as possible, politically proportionate.
- 2.4 Both the Overview and Scrutiny Committee and scrutiny panels oversee discrete policy areas and are responsible for scrutinising services or issues that fall within these portfolios.
- 2.5 A number of scrutiny functions are discharged by both the Overview and Scrutiny Committee and the individual panels. These include:
- Questioning Cabinet members on areas within their portfolio;
 - Monitoring service performance and making suggestions for improvement;

- Assisting in the development of local policies and strategies; and
- Monitoring implementation of previous scrutiny reports; and
- Budget monitoring.

2.6 As the 'parent' committee, the Overview and Scrutiny Committee is required to approve work programmes and to ratify reports and recommendations developed by scrutiny panels. The Overview and Scrutiny Committee also retains a number of scrutiny functions not undertaken by panels. This includes:

- Call-ins: where there is a challenge to decision taken by the Cabinet or individual Cabinet member or a key decision taken by an officer under delegated authority; and
- Councillor call for action: where local councillors can refer matters of genuine and persistent concern which have not been possible to resolve through usual council processes.

3. Overview and Scrutiny Committee

Councillors: Khaled Moyeed (Chair), Pippa Connor (Vice-Chair), Dana Carlin, Makbule Gunes and Matt White

Co-optees: Anita Jakhu and KanuPriya Jhunjhunwala (Parent Governor representatives), Yvonne Denny and Lourdes Keever (Church representatives)

3.1 There were eight formal meetings of the Overview & Scrutiny Committee in 2021/22, as well as several evidence sessions for the Committee's Scrutiny Reviews. In addition to the issues set out below, the Committee monitored the Council's performance as set out in the Borough Plan Priority Dashboards, and held a Question and Answer session with the Leader of the Council and the Chief Executive on their priorities for the year ahead.

3.2 Cabinet members were invited to share their plans and thinking for their respective areas and answered questions on progress of their work areas. The Cabinet briefs covered in the year were:

- The Leader;
- Employment, Skills and Corporate Services;
- Finance and Transformation;
- Local Investment and Economic Growth;
- Customer Service & Welfare

High Road West

- 3.3 In November 2019, the Housing and Regeneration Scrutiny Panel began a detailed piece of work into a proposed regeneration site known as 'High Road West' located in the Northumberland Park ward in the north-east of the Borough. The proposals included the demolition of council homes on the Love Lane estate, a number of businesses including those on the Peacock Industrial Estate and other Council-owned buildings used by community groups. Evidence sessions had been held with a range of witnesses including Council officers, representatives of local businesses and residents' associations. However, the Review was suspended due to the first lockdown period caused by the Covid-19 pandemic as Housing & Regeneration officers were diverted to support the Council's response to the pandemic. In May 2021 the Overview & Scrutiny Committee took the decision to prioritise the completion of the Review as part of its own work programme.
- 3.4 The Committee conducted further evidence sessions including with Council officers, the Council's developer partner Lendlease and with Tottenham Hotspur Football Club. The Committee's final report made recommendations on various aspects of the proposed redevelopment. These recommendations included guarantees that residents transferring from the Love Lane estate should not see an increase in their rent/service charges, on the required infrastructure/green space in the regeneration area and that, in future, regeneration plans should be drawn up using co-production principles with active input from residents, businesses and community and voluntary organisations. The Council's Cabinet approved a response to the recommendations of the review at its meeting on 18th January 2022.

Gambling Inquiry Day

- 3.5 At a meeting of the Overview & Scrutiny Committee in July 2021, the Council's draft Statement on Gambling Policy was considered. It was reported that Westminster City Council had undertaken their own research on gambling harms and that evidence gathered from this research was subsequently used as grounds to refuse a licensing application. It was suggested at this meeting that Haringey Council should commission its own research in order to set the Council on a better footing to potentially refuse an application and provide evidence if a decision is challenged/tested in a court of law.
- 3.6 The Centre for Governance & Scrutiny provided scrutiny officers with advice on 'Gambling Inquiry Days' held by other local authorities which aim to bring together a range of witnesses who deal with gambling and the harms that it can cause. This would help to establish what local data is currently available on gambling harms, which people are particularly vulnerable and what is known about the impact of gambling on them.
- 3.7 Haringey's Gambling Inquiry Day was held by the Overview & Scrutiny Committee in March 2022. Expert witnesses included a leading academic expert with a research background on gambling policy, the CEO of a gambling support project, a person with lived experience of gambling harms, a local resident

concerned about the impact of gambling establishments in Tottenham and Council officers from the Licensing Team and the Public Health Team. After hearing the range of evidence submitted, the Committee recommended that a funding source should be sought for additional local research on gambling harms, the greater use of education/prevention on gambling as a priority and the establishment of a 'gambling harms prevention champion' to lead any lobbying activity aimed at the government on this issue.

Good Economy Recovery Plan

- 3.8 The Committee received a report from senior officers on the Council's Good Economy Recovery Plan. This had been developed in response to the impact of the pandemic on the borough which had been amongst the most severe in London. The Plan included measures to re-open and support high street and town centres, assist residents into work and training and secure social and economic value through investments in communities and neighbourhoods. The Committee Chair had consulted with Haringey Business Alliance and reported that they were fully supportive of the Plan. The Committee noted that the latest data showed a cautious of growth in the borough but that this represented business taking back some of the recent losses that they had experienced.

Voluntary & Community Sector

- 3.9 The Committee looked in detail about how the Council works with Voluntary and Community Sector in Haringey. This included a presentation from the Chief Executive of the Bridge Renewal Trust, the Council's voluntary sector strategic partner. The Committee scrutinised the outcomes of the outcomes of the voluntary sector community group initiatives that had recently been funded by external funders and by the Council as part of the Covid support grant. It was noted that the Council was aiming to support grass root organisations through specific themes developed through the new Voluntary Sector Community Strategy and a detailed finance report was requested by the Committee.

Universal Credit

- 3.10 The Committee continued to monitor the implementation of Universal Credit in Haringey, receiving a presentation from the local Employment and Partnership Manager at the Department for Work & Pensions. The Committee scrutinised the employment support schemes in the borough, queried the extent to which the DWP was involved with SEND programmes in the borough, sought assurances about the number of job vacancies available to deaf and disabled claimants and proposed further action to support people into employment after coming out of prison.

4. Adults and Health Scrutiny Panel

Chair's Introduction

Cllr Pippa Connor, Chair

Councillors: Pippa Connor (Chair), Mark Blake, Gideon Bull, Nick da Costa, Eldridge Culverwell, Mahir Demir and Sheila Peacock.

Co-optees/Non-voting Members: Ali Amasyali and Helena Kania

Overview

- 4.1 There were five formal meetings of the Adults & Health Scrutiny Panel in 2021/22, one of which was dedicated to scrutiny of the Draft Budget (2020/21) and the Medium-Term Financial Strategy (2020/21-2024/25). The meetings involved Q&A sessions with the Cabinet Member for Adults & Health and discussions with senior Adults & Health officers and a range of external witnesses on key issues of concern. The Panel also held a number of evidence sessions to gather information in support of its two Scrutiny Reviews, both of which were published in March 2022.

Scrutiny Reviews

- 4.2 The Panel published its final report for the Scrutiny Review on Adult Social Care Commissioning & Co-production in March 2022. While the Review initially began with the aim of understanding the commissioning process, the Council's recent emphasis on co-production became an area of particular interest that the Panel focused on in more detail.
- 4.3 The term co-production is not always widely understood and has a number of definitions. Throughout the evidence heard, the Panel's understanding of what residents wanted co-production to mean was for service users and carers to have an equal voice during the decision-making meetings. They wanted a defined role with terms of reference for the specific project with minutes taken and actions agreed; a desire not only to be there at the start of the project, but to monitor its delivery and advocate for any changes within the commissioned service. They wanted their opinions to count. The Panel made 18 recommendations to the Cabinet, including that a charter and framework structure should be established to ensure that everyone is clear about where responsibility of co-production lies and that the meaningful involvement of residents is embedded in the decision-making and delivery monitoring process.

- 4.4 The Panel also published its final report for the Scrutiny Review on Access to Health and Social Care Services for Sheltered Housing Residents in March 2022. The Panel had been concerned that sheltered housing was an area that was struggling with a loss of site managers for each scheme and a change from a mainly older frailer population to also include younger residents with high needs. The Panel visited two sheltered housing schemes in the borough to speak to staff and residents and also took verbal and written evidence from residents, senior managers and other staff. The Panel felt that residents within sheltered housing can often feel forgotten and that consideration needs to be taken over how residents with high health and care needs are being supported and monitored. The Panel made 10 recommendations to the Cabinet, including on embedding sheltered housing schemes in the Council's new locality approach and for improved access to services for residents, such as through regular visits by district nurses and the development of close links with local mental health staff.

Public Health response to Covid-19 pandemic

- 4.5 The Panel scrutinised the Council's public health response to the Covid-19 pandemic, receiving a report from the Director for Public Health. This included a statistical analysis of the age-standardised Covid-19 death rate in Haringey which was slightly above the median for London boroughs and data which demonstrated a moderate to strong correlation between higher rates of Covid-19 deaths and areas with a higher proportion of people from BAME backgrounds. The Panel studied the vaccination rates across the borough, noting that there was a geographical disparity in rates in the east of the borough which were considerably lower than those in the west. A discussion followed on how to increase uptake in the vaccine in communities with lower rates.
- 4.6 The Panel also endorsed the recommendations of the Joint Partnership Board's "Living Through Lockdown" report which examined the experience of adult social care service users and carers in Haringey during the first lockdown. Recommendations included improved communications from the Council/NHS, improved digital service provision/enablement and greater coordination and consistency in services, information and advice. The Panel will continue to monitor the Council's response to these recommendations.

Adult Carers' Strategy

- 4.7 An overview was received by the Panel on the Council's Adult Carers' Strategy for 2020-2023 which is for unpaid adult carers. The Council had recently been working with carers across the borough to co-develop the strategy and a carer and co-Chair from the working group spoke to the Panel about her experience. She had done so because she wanted carers to have a voice and be effectively supported, including young adult carers and carers for those with mental health needs who were underrepresented.

- 4.8 The Panel heard that the launch of the strategy would be followed by the creation of a Carers' Action Plan which had been co-designed with five different workstreams. The Panel emphasised the importance of supporting young people who were caring for their parents or other family members and of understanding that carers do not always understand what support they are entitled to. The Panel also raised issues around the paperwork for carers being too complicated and the lack of awareness about the consultation work. The Panel made a recommendation on better coordination with GP colleagues, including clarification on who would be championing carers' issues within GP practices.

Locality Working

- 4.9 An overview was received by the Panel on the Council's Adult Carers' Strategy for 2020-2023 which is for unpaid adult carers. The Council had recently been working with carers across the borough to co-develop the strategy and a carer and co-Chair from the working group spoke to the Panel about her experience. She had done so because she wanted carers to have a voice and be effectively supported, including young adult carers and carers for those with mental health needs who were underrepresented.
- 4.10 The Panel raised concerns about crime/anti-social behaviour issues around the Northumberland Park Neighbourhood Resource Centre which Members felt could put some vulnerable clients off from attending. The Panel also recommended:
- A review of public transport links to the Northumberland Park Neighbourhood Resource Centre.
 - Early discussions on partnership working and funding for improvements in the surrounding area to the Neighbourhood Resource Centre including the Police, NHS partners, Tottenham Hotspur Football Club and the Council's Regeneration Team.

Mental Health

- 4.11 A presentation was received by the Panel about Haringey's Great Mental Health Programme which was designed to reduce mental health inequalities by targeting at-risk and vulnerable groups and minority ethnic communities. It comprised of seven different programmes of activity including face-to-face and digital support for residents of all ages. Activities included parenting support, befriending groups, outreach work, community-based wellbeing and social activities and tailored support for vulnerable residents. Some of the activities were focused in the central and east parts of Haringey where risk factors for poor mental health were greatest. The Panel was made aware that this was an externally funded programme for one year and that a number of programme activities were due to cease in August 2022 unless action was taken to ensure the sustainability and legacy of the programme.

- 4.12 The Panel noted the heightened importance of mental health and wellbeing in Haringey following the Covid-19 pandemic and would continue to monitor this as a priority issue in 2022/23.

Cabinet Member Q&A

- 4.13 The Panel held two Q&A sessions in 2021/22 with the Cabinet Member for Health, Social Care and Well-being, Cllr Lucia das Neves, covering a range of topics including:
- The Council's ongoing response to the Covid-19 pandemic, including the vaccination of care staff.
 - Funding for social care and for the prevention of Violence Against Women and Girls (VAWG).
 - The renovation of the former Irish Centre site in Tottenham which included plans to provide space for the relocation of day opportunity services provided by the Grace Organisation.
 - Progress on the rebuilding of Osborne Grove Nursing Home.
 - Recent progress of the Haringey suicide prevention group including possible collaboration with the construction industry to support employees.
 - Delays in the completion of home adaptations.

Budget Scrutiny

- 4.14 As part of the Council's budget scrutiny process, the Panel examined proposals for the 2021/22 budget and the Medium-Term Financial Strategy with recommendations and requests for further information made to the Cabinet.

Joint Scrutiny work

- 4.15 The Chair of the Panel, Cllr Pippa Connor, is also Chair of the North Central London joint Health Overview and Scrutiny Committee (JHOSC) which covers the boroughs of Barnet, Enfield, Camden, Haringey and Islington (see section 8 of this report). Emerging issues that are raised at the JHOSC are often reported to the Adults & Health scrutiny panel and vice-versa.

5. Children and Young People Scrutiny Panel

Chair's Introduction

"The Children and Young People's Scrutiny Panel covers, amongst other things, safeguarding and education improvement, which are high priorities for both residents

and the Council. The Panel has aimed to focus on the key issues in these areas and the following were included within its work during the year.”

Cllr Makbule Gunes, Chair

Councillors: Makbule Gunes (Chair), James Chiriyankandath, Emine Ibrahim, Josh Dixon, Sarah James, Tammy Palmer and Daniel Stone

Co-optees (Voting): Yvonne Denny (Church of England representative), Anita Jakhu (Parent Governor), Kanupriya Jhunjhunwala (Parent Governor) and Lourdes Keever (Catholic Church representative).

Review on Haringey Family of Schools

- 5.1 The Panel completed its review on the range of the different types of school within the borough. It found that there are significant and permanent changes that occur when schools become academies, which are not always fully explained to school governors, who may therefore be unaware of the long-term implications of decisions. In addition, there has been a significant drop in demand for school places, which could have serious implications for the finances of schools. The Council has limited scope to agree a coordinated response to the drop and demand. It was recommended that further work be undertaken to maximise the effectiveness of schools in managing their finances.

Review on Child Poverty

- 5.2 Current data on the scale of child poverty in the borough was of deep concern to the Panel. Levels are also likely to get worse in the next four years due to increases in the cost of living. The Panel therefore felt that poverty should be a key priority within the refreshed Borough Plan. Children are not poor in isolation but as part of families and there are a range of causes. The response therefore needs to be cross cutting, coordinated and collaborative. Families can struggle to find out the support available and there is considerable stigma with seeking help. The expansion of free school meals has provided the Council with a route into schools and can provide the opportunity to improve communication of support available.
- 5.3 Customer Services are the first port of call for many struggling families seeking support. Work should be undertaken to increase further their accessibility and simplify application processes. Families do not always seek to access services at the correct location and work should be done to ensure that families are assisted irrespective of where they seek to access support. The Panel recommended that work on the development of the Council’s Food Strategy be prioritised and be a key part of the refreshed Borough Plan and any strategic plan to address poverty.

Youth Services

- 5.4 The Panel noted that the Council provided universal and targeted youth services. There was a lot of outreach work and this often also involved partners, such as the Police and schools. Mental health is a key focus and not just because of the effects of the pandemic. There had been projects on a wide range of other subjects, including gardening, media, self-defence and music. The pandemic had had a significant effect on participation, reducing attendance by two thirds and a virtual offer had been developed in response. The amount of face-to-face work was now being increased.
- 5.5 The Panel noted the service's five priorities for the forthcoming year:
- Working with the National Youth Agency (NYA) to develop hard and soft outcome measures;
 - Developing co-design;
 - Increasing the number of young people in education, employment and training;
 - Progressing significant capital projects; and
 - Securing longer term funding for a larger proportion of the service's work.

Covid 19 - Impact on Children and Young People

- 5.6 The Panel heard that the full impact of the lockdowns would not be known for some time. Some children had been born during them and deprived of early socialisation, whilst other children had been affected by mental health issues or bereavement. The number of families found to be struggling with poverty had been more than anticipated. There were also concerns about domestic abuse and it was known that many families lived in cramped conditions. Poverty and family stress were most prevalent in the east of the borough but they had also now spread to the west.
- 5.7 The childcare sector had been massively affected and only local authority and a few private nurseries had remained open. The Council had nevertheless been able to offer childcare to all that had asked for it. Facilities had re-opened and there were still the same number of nurseries but not all childminders remained in business. It had been necessary to embed remote education quickly and collaborative work had ensured that provision was strong. A considerable effort had been made to ensure that children had laptops and a large number of free school meals had also been provided. It had been estimated that the average amount of learning lost was three months but it was likely to be more for the most disadvantaged children. The government had allocated £1.4 billion for education recovery and this included £1 billion for tutoring, which would be delivered through schools and colleges.
- 5.8 In respect of social care, there had been concerns regarding vulnerable children not being able to attend hospital appointments and get into school. Work had taken place through Haringey Safeguarding Children's Partnership (HSCP) to set up systems to provide support. The first three weeks after the first lockdown had been focussed on ensuring children had access to basic needs and approximately 1,000 children were identified as requiring particular attention. A system to monitor data on a daily basis was set up. Work was also undertaken with HSCP to provide for face-to-face contact with the most vulnerable children. The response had demonstrated the strength of partnership work in the borough.

- 5.9 The Panel raised the issue of authorisation of school absences of young people who were clinically extremely vulnerable or had parents who were. Many children in such a situation had stayed away when schools had reopened and Education Welfare Officers had been in communication with schools regarding how such absences were marked. The Council had been clear that schools should not be punitive and guidance and support had been provided. Panel Members expressed concern regarding the funding that the government had made available to enable children to catch up on lost learning through the provision of tutoring. It was noted that there were constraints on the use of such funding but schools were working creatively to make the best use of it.

Missing Children

- 5.10 The Panel noted that safeguarding partners supported and had adopted the protocols relating to missing children, which had been reviewed earlier this year. Training on the updated protocol was taking place and included the actions supporting it. Recent achievements by the Council and partners included:
- Development of an app to enable young people to activate support and request a return home interview;
 - Widening the quarterly reporting to provide analysis of key themes and issues in order to better understand child sexual and criminal exploitation; and
 - Repurposing Family Network meetings to provide opportunities for looked after children to develop their care plans and shape their contact arrangements safely.
- 5.11 Looked after children are most at risk from going missing. Missing children were likely to be involved with “county lines” and low-level drug distribution. A disproportionate percentage are from BAME communities and was highest amongst the 15 to 17 age group. Between April 2020 and March 2021, there had been a total of 806 missing episodes reported, involving 190 children. The service were aware of the identities of the children who most frequently went missing and provided a range of support. All children were offered a return home interview but not all took up the offer. Return home interviews were only effective if follow up support was offered that addressed the reasons for absconding.

Area SEND Inspection

- 5.12 The Assistant Director for Early Help, Prevention and SEND, summarised the outcome of the joint area inspection of SEND within Haringey. The inspection had focussed on how well SEND was identified, outcomes improved and needs met. The authority was required to address:
- Poor quality of EHC plans and the annual review process;
 - Lack of partnership working and poor communication and co-production with parents, children and young people;
 - Unacceptable waiting times for Autism Spectrum assessments and insufficient support whilst people were waiting.
- 5.13 A written statement of action was required to be produced within 70 days. Work was also taking place with parents, carers and partners to develop a new SEND strategy. There was a strong focus on outcomes so the authority knew it was making a

difference and that these were measurable through key performance indicators, based on what families told them and what they saw. To truly make the difference, there needed to be shared ownership and accountability with families and partners. The written statement of action was being drafted based on priorities within SEND Strategy. The SEND Executive Board were accountable for its delivery and ensuring the timescales were realistic and outcomes achievable. The Panel were of the view that the plan was very well thought through. A further report was requested in due course that specifically covered the development of a new parent carer forum.

Mental Health and Well-Being of Children and Young People

- 5.14 The Panel heard how the Council and its partners were working together to support the mental health and well-being of children and young people. Services were critical to supporting local children and young people. It was known that Covid had had a huge impact, although the picture from data was complex. There had been a large increase in referrals during the pandemic. Most had been for anxiety and low mood. The prime areas of investment in services had been concerned with crisis and a number of services had been developed. A 24/7 crisis line had been set up as well as an out of hours nurse led service. In addition, Diversion Hubs had been established. These aimed to see young people within four hours and prevent the need for them to go to hospital, which could be very distressing. Trailblazer was also being expanded to the west of the borough. Waiting times for autism assessments were long throughout the NCL area and solutions to this were being worked on. An online platform on ADHD was shortly being rolled out and significant service redesigns were taking place across BEH in order to remove unwarranted variations.

Haringey Safeguarding Children's Partnership – Annual Report

- 5.15 David Archibald, the Independent Chair, reported on the progress made by Haringey Safeguarding Children's Partnership since its inception. The new arrangements had been implemented from September 2019 and there were now three agencies that were equally accountable for safeguarding children. These were the Council, the Police and the Clinical Commissioning Group (CCG). The Council provided 80% of the budget. In addition to the amounts in the budget, contributions in kind were also received from agencies. The changes were significant change and a lot of preparatory work had been necessary, including publication of the new arrangements. There was a requirement for them to include independent scrutiny.
- 5.16 The partnership had been developing well but the Covid pandemic had had a severe impact. The partnership had responded strongly to it and increased the frequency of its meetings to ensure that safeguarding was maintained. There had been 10,700 contacts in the previous year. The highest number of these had come from the Police. There had been 2,877 referrals, compared to 3,612 in the year before. Performance data was monitored to identify patterns and regular audits undertaken to promote challenge and learning. National guidelines were followed in respect of serious incidents. There were currently two Serious Case Reviews in progress. There were three specific themes within the priorities for the forthcoming year. These were:
- Children living with mental health issues;
 - Prevention and early intervention; and

- Older children in need of help and protection and contextual safeguarding, including exploitation.

5.17 In answer to a question from the Panel regarding whether the new arrangements were sufficiently robust yet to safeguard children effectively, Mr Archibald stated that the three strategic partners were now working more closely together than in the past. It was widely accepted that the best systems protected children by reducing levels of harm done but it was not possible to reduce this to zero.

Scrutiny of the 2022/23 Draft Budget/5 Year Medium Term Financial Strategy (2022/23-2026/27)

5.18 The Panel considered the budget proposals for 2022/23, which included growth spending of £11.8 million across the Council. Short term use of reserves had made the growth proposals possible. The Quarter Two financial position for Children and Young People (C&YP) showed an overspend of £7 million, £3 million of which was from Covid. The Dedicated Schools Grant showed an overspend of £6.3 million. The key driver for this was the increased number of children with Education, Health and Care (EHC) plans. The proposals provided growth funding for C&YP of £4.172 million in 2022/23 and £5.376 million during the MTF period. There were also savings of £1.679 million in 2022/23 and £2.039 million for the period as a whole. The capital budget included £92.9 for C&YP services during the MTF period, which was funded by government grant and borrowing. There was one new scheme included within this, which was for a new in-borough residential care home, which would provide high quality provision at a lower cost. The projected year end deficit of the DSG was £23.9 million. The total within the DSG for the forthcoming year was £288.34 million.

5.19 The Panel commented that the language that was used in the report to describe the reasons for the overspend in the High Needs Block of the DSG could be open to the misinterpretation that children with EHC plans were being blamed. An overspend was inevitable as SEN was inadequately funded by central government. It was demand led and the Council had a responsibility to deliver services. Councillor Zena Brabazon, the Cabinet Member for Early Years, Children and Families, stated that the cause of the overspend was that there was insufficient funding from the government and there was no intention to blame families. The responsibility for providing support had been extended until the age of 25 for some young people but no additional funding had been provided. Families had a legal right to support and it was a demand led service. It was noted that there was a commitment by the Council to consult but the documentation was not easy to understand and needed to be made more accessible to members of the community. Other local authorities had addressed this issue and an option that could be explored was the provision of easy to read version.

Cabinet Q & A

5.20 Councillor Zena Brabazon, the Cabinet Member for Early Years, Children, and Families, attended meetings of the Panel and took part in a Q&A at two meetings. Amongst the issues raised were;

- Parental involvement in special educational needs and the development of a new parents forum;

- Early Years provision; and
- Falling school rolls.

6. Environment and Community Safety Scrutiny Panel

Chair's Introduction

"We had a busy year in 2021/2022. As well as the normal business of the panel, taking evidence from cabinet members and scrutinising the budget, there were a number of matters that required specific focus. We took evidence from a delegation regarding the Edmonton incinerator and then followed up with a session with North London Waste Authority, in order to find out more about the scheme. We also took evidence on the difficulties with the online parking permit system and on the destruction of trees at various locations in the borough. We began an in-depth scrutiny on Low Traffic Neighbourhoods, which will need to be completed this year. The meetings were held in a hybrid format, for Covid security. Hopefully we will be able to go back to in person meetings this year.

Cllr Dana Carlin, Chair

Councillors: Dana Carlin (Chair), Gideon Bull, Scott Emery, Julia Ogiehor, Eldridge Culverwell, Preston Tabois & Kaushika Amin

Co-opted Member: Ian Sygrave (Haringey Association of Neighbourhood Watches)

Overview

6.1 There were five formal meetings of the Environment and Community Safety Scrutiny Panel in 2021/22, one of which was focused on scrutinising the budget proposals for the Place priority of the Council's Borough Plan. The work plan for the panel for 2021/22 was made up of a combination of issues raised by the Panel Members and areas of concern put forward by councillors, residents and partners as part of the scrutiny survey undertaken in February 2021. The Panel held Q&A Sessions with the Cabinet Members responsible for the policy areas under its remit and discussions with senior Environment & Neighbourhoods officers, Strategic Planning officers and a number of external stakeholders on key issues of concern. The Panel also began its Scrutiny Review on Low Traffic Neighbourhoods and held evidence sessions to gather information in support of the review.

Community Safety

6.2 The Panel scrutinised a range of topics during the year. In relation to community safety these included a report which set out the Haringey Crime and ASB hotspots and the actions being taken to reduce crime in these areas. The Panel

received performance information against MOPAC performance indicators, as well as a presentation from the Borough Commander and the Leader of the Council on the Community Safety Partnership's local priorities for tackling crime in the Borough.

Strategic Transport

- 6.3 The Panel received a number of updates on the Council's Transport Planning programmes, including the draft Walking and Cycling Action Plan, the Low Traffic Neighbourhood Programme, Transport for London funding update (post covid), and actions being taken to reduce congestion and improve east to west transport links.

Waste, Recycling & Parking.

- 6.4 The Panel received updates on Veolia as well as performance levels in respect of waste, recycling and street cleansing performance. The Panel also received an update on the Fly tipping Strategy as well as an update on the implementation of the Parking Transformation Plan. The Panel received updates on proposed changes to waste legislation that have been announced by the government, which include the Extended Producer Responsibility Consultation 2021, the Deposit Return Scheme 2021 and the Household and Business Consistency in Recycling Consultation 2021.

Parks & Green Spaces.

- 6.5 The Panel received updates on the Council's tree strategy, including additional investment in new trees. The Panel also received updates on the draft Parks and Green Spaces Strategy and flood management works that were being undertaken in Queen's Wood.
- 6.6 The Panel received a deputation on proposals to replace the NLWA waste incinerator at Edmonton and how this fitted in with the Council's wider climate change goals. The Panel also received deputations at its meetings around the management and maintenance of Parkland Walk and the need for increased investment in street trees across the borough.

NLWA Heat and Power Project

- 6.7 Following concerns raised by local residents, the Panel invited the North London waste Authority to give a presentation and to answer questions around its Heat and Power Project, which included proposals to invest in a new waste incinerator at its Edmonton Eco Park site.

Updates on Previous Scrutiny Reviews

- 6.8 The Panel received a further update on the implementation of the recommendations from its Scrutiny Review into Cycling and also received an initial update on the implementation of the recommendations from the review into Supporting Better Access to Parking for Disabled People and Blue Badges.

Financial Scrutiny

- 6.9 As part of the Council's formal budget scrutiny process the Panel examined proposals for the 2022/23 budget and the Medium Term Financial Strategy in December 2021 with recommendations subsequently made to Cabinet.

Cabinet Member Q&A

- 6.10 The remit of the Panel covers the portfolios of three Cabinet Members and the Panel held Q&A sessions with each Cabinet Member. The Panel had two Q&A sessions with the Cabinet Member for Environment, Transport and the Climate Emergency, key areas of questioning involved; the Climate Emergency, Low Traffic Neighbourhoods, Parks and Green Spaces and the Walking and Cycling Action Plan.
- 6.11 The Panel also held one session with the Cabinet Member for Customer Service, Welfare and the Public Realm. Key areas of questioning included; Parking and Blue Badges, Public Realm improvements, Waste Management and Enforcement. The Panel held one Q&A session with the Leader of the Council around her Community Safety portfolio, which focused on Serious Youth Violence, Crime Hotspots, Violence against Women and Girls, Hate Crime, Early intervention and the Turnpike Lane Strategy Forum.

7. Housing and Regeneration Scrutiny Panel

Chair's Introduction

"This year, the Housing & Regeneration Scrutiny Panel has covered a wide range of topics within its remit. We've heard evidence on how regeneration projects like the Wards Corner scheme in Seven Sisters impact on the local communities there. We've looked at how outstanding repairs and maintenance issues affect Broadwater Farm residents. We've examined how well the Council is embedding the need to combat climate change in its council house building and estate renewal schemes. We've asked questions about how well the Council is conducting ballots on demolitions of existing council housing in its housing and estate renewal projects.

As well as asking questions of the two Cabinet Members whose portfolios fall within the Panel's remit, we've heard from several deputations from residents, who have provided valuable input into our deliberations and helped us form the recommendations we put to the Council's decision makers.

More detail on the Panel's activities is set out below."

Cllr Matt White (Chair)

Councillors: Matt White (Chair), Dawn Barnes, Ermine Ibrahim, Bob Hare, Noah Tucker, Kirsten Hearn, Charles Adje.

Overview

- 7.1 There were five formal meetings of the Housing and Regeneration Scrutiny Panel in 2021/22, one of which was dedicated to scrutiny of the Draft Budget (2022/23) and the Medium Term Financial Strategy (2022/23-2026/27). The meetings involved questioning Cabinet Members and discussions with senior Housing & Regeneration officers and senior Homes for Haringey staff on key issues of concern. The Panel also held a number of evidence sessions to gather information in support of its scrutiny reviews.

Scrutiny Review – Wards Corner

- 7.2 The Panel has been gathering evidence during 2021/22 as part of a Scrutiny Review into the future of the Seven Sisters indoor market site in Tottenham, as part of the Wards Corner development. The Panel received deputations from two different sets of community groups at its September meeting and agreed to look into the issue in more detail.
- 7.3 The Panel undertook a Scrutiny Review on Wards Corner in 2018, the current review is a follow-up review to look at future options for the site following the end of the Council's development agreement with Grainger, after Grainger pulled out. The site is owned and managed by TfL. TfL are pulling together proposals for the future management of the site and have been engaging with local stakeholders, including the Council and community groups. Cabinet has been exploring options to support a community plan for the site. However, not all of the community groups and market stall holders support the community plan. The Panel have been looking into the various options and will be producing a report with recommendations about the future of the site and the Council's role within this.

Scrutiny Review – Broadwater Farm Repairs

- 7.4 Site visits by Panel Members have taken place at Broadwater Farm to examine the progress with implementation of the Decent Homes Plus monies agreed by Cabinet in 2019. This money was to cover estate improvements such as kitchens and bathrooms, but also investment in communal areas across the Broadwater Farm estate. The recommendations from the Review will be rolled into a future Scrutiny Review on the future of Housing Delivery options in Haringey.

St Ann's Development

- 7.5 The Panel received an update on the proposed development of the St Ann's site. This site was purchased by the Mayor in 2018 as part of the Mayor's Land Fund and the Mayor has subsequently appointed Catalyst as its development partner. The redevelopment would deliver around 930 new homes, 60% of which will be affordable. It will also provide a new and enlarged Peace Garden, improved

streets as well as new retail and affordable workspaces. The Council was in negotiations to purchase 50% of the affordable rent homes. The Panel's focus in this area has been on the purchase of new Council homes, seeking to maximise the number of homes that we can purchase, and the number of homes provided at social rents. The Panel was also interested in ensuring that service charges should be the same across all Council properties and ensuring that the Council would have full nomination rights for the 50% of affordable homes it has purchased.

Climate Change

- 7.6 The Panel received a report on Climate Change and how portfolios and services across the Council were contributing to reducing carbon emissions. Haringey has made a commitment that the borough would be carbon net-zero by 2041 and that the Council's buildings and vehicle fleet would be carbon net-zero by 2027. The Council has allocated £101m to retrofitting Council housing stock and the Panel was advised that a strategy is being developed around this programme, which includes focusing on the worst performing buildings first. The Panel's key areas of interest in this area were: Discussions on a pan-London energy retrofit programme, as well as the Energiesprong pilot to retrofit homes in Haringey in agreed pilot locations; progress against carbon reduction targets; the roll-out of electric vehicles; and enforcing minimal energy efficiency standards through the private landlord licensing scheme.

Love Lane

- 7.7 The Panel received an update on the resident ballot undertaken on the Love Lane estate as part of the High Road West Regeneration scheme. The ballot took place from 13 August to 6th September and was administered by Civica Election Services. The results of the ballot were that 55.7% voted in favour of the proposals, with a turnout of 69.4%. The Panel made some recommendations to the Cabinet Member about ensuring that, in future, officers did not post sealed ballot papers on behalf of residents with mobility issues and that the Cabinet Member give consideration to looking at undertaking a further ballot.

Cabinet Member Q&A

- 7.8 The Housing & Regeneration Scrutiny Panel oversees a range of issues that cover the portfolios of two different Cabinet Members: the Cabinet member for Planning, Licensing and Housing Services and the Cabinet Member for House Building, Place Making and Development. Rather than have dedicated Q&A sessions focused around a particular portfolio area, the Panel sought to have both Cabinet Members attend each meeting and to respond to questions throughout the course of the meeting. The key areas of questioning were around:
- The Council's Housebuilding programme and progress to date on building new Council homes.
 - The refresh of the Local Plan and consultation around this.
 - High Road West
 - Wards Corner and future plans for this site
 - Broadwater Farm – Repairs and maintenance issues

- Homes for Haringey's Repairs Service
- St Ann's Development
- The Climate Emergency.

Financial Scrutiny

- 7.9 As part of the Council's budget scrutiny process, the Panel examined proposals for the 2022/23 budget and the Medium-Term Financial Strategy with recommendations and requests for further information made to the Cabinet.
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8. North Central London Joint Health OSC

Overview

- 8.1 Haringey is a part of a joint health overview and scrutiny committee (JHOSC) covering the boroughs of Barnet, Enfield, Camden, Haringey and Islington. Each borough has two representatives on the Committee. Haringey's representatives on the JHOSC were Cllrs Pippa Connor (Chair) and Khaled Moyeed. The Committee was established to scrutinise health issues common to all of the five boroughs. Amongst the issues discussed this year at the JHOSC were the following:

GP Services

- 8.2 The Committee heard that all contracts with GP practices were delegated from NHS England to CCGs. GP practices were working together with local health and voluntary services in groups, known as Primary Care Networks. Alliances of GP practices were also working together to deliver primary care services and these were known as GP Federations. Under the developing Integrated Care System (ICS), it was envisioned that GP provider alliances would ensure a strong voice for primary care in decision-making.
- 8.3 Primary care had worked exceptionally hard throughout the Covid-19 pandemic. There had been a reduction in face-to-face provision at the beginning of the pandemic but over 50% of appointments were now face-to-face and were provided if requested. The traditional model was still important but the system needed to modernise to deal with demand and ensure high standards. The Committee highlighted the principles of post-Covid digital healthcare that were included in the Healthwatch report; Locked Out: Digitally excluded people's experiences of remote GP appointments:
- Maintain traditional models of care alongside remote methods and support patients to choose the most appropriate appointment type to meet their needs;
 - Invest in support programmes to give as many people as possible the skills to access remote care;
 - Clarify patients' rights regarding remote care, ensuring people with support or access needs are not disadvantaged when accessing care remotely;

- Enable practices to be proactive about inclusion by recording people's support needs;
- Commit to digital inclusion by treating the internet as a universal right.

8.4 The Committee noted that changes to the way NHS Digital would access and use GP data had been announced. GPs would provide pseudonymised data, which would be used to plan services and monitor delivery. They accepted that the data would be valuable for research purposes but expressed concerns about its commercialisation. It was considered that the governance arrangements and safeguards for patient data needed to be clearer.

Mental Health and Community Services Review

8.5 The Committee noted that there were mental health and community services reviews being run concurrently as they provided a number of related services. A key aim of the reviews was to ensure that there was a consistent offer across North Central London. Resident engagement was at the centre of the review design principles and there was a resident reference group with diverse membership and representation from all five boroughs. It was acknowledged that there had been minimal feedback from harder to reach groups and work was underway to maximise engagement from such groups. The review had a strong focus on increased prevention and would consider whether it was possible to provide services more directly, without the need for a referral.

Digital Inclusion and Health Inequalities

8.6 The Committee received a report on the work of the Communities Team, which had been set up as part of the NCL CCG Borough Directorate. It had been developed to focus on health inequalities and the delivery of plans to address them. The team was focusing on developing interventions to address inequalities but their wider determinants needed to be understood to do so effectively. Understanding the needs of residents and empowering them would enable the right interventions to be put in place.

8.7 Officers stated that it was important that they were able to demonstrate that local communities and residents had been listened to. Medical interventions were not always required to address inequalities and social interventions, employment opportunities or access to digital resources were sometimes needed instead. Through understanding the experiences of residents, interventions could be better embedded into assessments. The Committee requested an update in due course, including information on the next cohort of projects and how residents had been engaged with.

Update on Integrated Care Systems (ICS)

8.8 An overview of the development of the ICS, including its benefits for residents, was received by the Committee. The ICS would take on responsibilities which previously sat under the CCG and be placed based. The new set up would enable continued engagement with residents and the ability to respond to their needs, which had changed following the pandemic. The Integrated Care Board (ICB)

would be established to work with local authorities to understand the place-based partnerships arrangements and how the ICS could best deliver these. The primary aim of the ICS was to streamline work and reduce unnecessary bureaucracy. Clinicians would remain at the heart of the system, but services would be designed around local people.

- 8.9 The Committee noted that local authority involvement would be a key aspect of the ICS and the NCL Partnership Council would have all five local authority Chief Executives on it. There was a commitment to collaborative working, which had already been evidenced over the previous 18 months. It was not anticipated that there would be any change in terms of the role and engagement with the JHOSC but officers were unable to provide specific detail on arrangements as the bill had still not been confirmed.
- 8.10 Seven recommendations had been put forward by the Committee:
1. The Integrated Care System (ICS) and its committees should be as open to the public as possible.
 2. The NHS ICS Board should include local authority representation, local authority voting rights, and the ability to discuss and challenge decisions. It should also ensure that all agendas, minutes, and relevant documents are open to the public. It was considered that this would ensure transparency and accountability.
 3. The role of the Joint Health Overview and Scrutiny Committee (JHOSC) should be maintained, including the ability to scrutinise all decisions made by the ICS. It was also considered that the JHOSC should retain the right of refer matters to the Secretary of State.
 4. The ICS should consider how patient and resident voices would be included in its processes. The JHOSC felt that patient and resident voices should be included at all levels, including the top level.
 5. The JHOSC also requested further detail on the arrangements for the NHS ICS Board, the governance and committee structure within the ICS, and the relationship between the different committees, and how the voices of patients and residents would be included.
 6. The ICS should have an identified committee that was aware of any business relationships between primary, secondary, and tertiary providers to ensure openness and transparency.
 7. To support the NCL NHS Watch recommendation.
- 8.11 They had been noted by the ICS but they were unable to respond until after the bill had been passed.

Winter Pressures

- 8.12 The Committee noted that the priorities for winter were to reduce ambulance handover delays, to maintain elective recovery and to maintain the rollout of the vaccination programmes for Covid-19 and the flu. There had been increases in primary care and urgent presentations, as well as low acuity appearances at A&E. 6% of general and acute beds and 20% of critical care beds were occupied by Covid positive patients. 80% of these patients were unvaccinated, which underlined the importance of maintaining the vaccination programme. There were high levels of bed occupancy with an average of 96% across North Central

London (NCL). The pandemic had exponentially increased how trusts provided mutual aid and that escalation triggers were in place and had been strengthened for winter.

- 8.13 In relation to primary care, situation reports were being undertaken by practices every two weeks. There were some concerns about a small number of practices being closed and work was underway with them to ensure continuous provision. 20% of practices were reporting constraints on administrative capacity and some staff were experiencing abuse from patients. The Winter Access Fund had provided approximately £7 million to extend primary care capacity over the winter period. This would be supporting practices to extend same day access and would be channelled into the areas with the highest levels of deprivation.
- 8.14 The Committee noted that the London Ambulance Service (LAS) had experienced a large increase in demand. In relation to hospital breaches in October 2021, it was reported that there had been 450 over an hour at North Middlesex Hospital, 459 at Barnet, 333 at the Royal Free, 159 at Whittington, and 48 at University College London Hospital. Since October, the LAS had been developing a new process, which had been trialled over a two week period and had reduced delays. The non-emergency NHS number, 111, had seen significant activity over the pandemic with a 30% increase in calls which was approximately 610,000 calls per year. Additional call volumes were anticipated over the winter and that suitable resources should be in place, although there were staff retention issues across the country. Work had been undertaken by the LAS to identify which trusts were under the most pressure and which had capacity and boundary areas had been adapted in response. A number of LAS sites across London had been reconfigured in response to the Covid-19 pandemic but had now been deconsolidated to increase capacity. There was a long term ambition for the LAS to move to a more centralised model but no further changes were anticipated at present. It had been difficult to identify direct links between changes and impacts due to the number of developments that had taken place.
- 8.15 The Committee requested a future update on the results of the proposed actions to improve LAS waiting times. In relation to e-consult, the Committee asked to receive additional information on how it was being used and whether it was an appropriate platform. In relation to workforce pressures, the Committee requested a future update to ensure that GPs and staff were appropriately supported.

Elective Services Recovery

- 8.16 The Committee received an update on elective services recovery in North Central London. At various points over the past two years, elective services resources had been redeployed to respond to the Covid-19 pandemic. Infection prevention control measures had also reduced the efficiency of services by about 15%. The elective services waiting list had grown but this had provided some opportunities to transform delivery and work differently. NCL had been the first Integrated Care System (ICS) in London to be given permission to re-start elective services. A new elective centre had been opened in the Grafton Way building of University College London Hospital (UCLH). Seven clinical networks had been developed, which covered the high volume elective specialties and had resulted in improvements to pathways.

- 8.17 NCL had been identified as an accelerator site and this provided some additional funding. 15 projects had been funded through the programme, including a community gynaecology service and a data system which meant that all providers had access to waiting lists and could look to redistribute patients accordingly to even out waiting times.
- 8.18 The Chair noted that there were particular stresses around workforce and suggested that it would be useful for the Committee to consider this. It was commented that this could focus on the pilots, possibly the health and social care pilot where there was some council involvement. The Chair added that the Committee would request an update on the outcomes of the elective services recovery programme and whether waiting times had been reduced as a result.

Dental Services Update

- 8.19 The Committee noted that dental practices had been asked to close at the start of the Covid pandemic due to safety concerns and had remained closed for 12 weeks, which had caused a large backlog. During this period, only patients in urgent need had been seen. Urgent care hubs had been established and these had been treating between 1500 and 1750 patients per day. Primary care dental services were being gradually re-established, with full capacity being reached in the current quarter. £50 million of short term funding had been allocated by the government to address backlog. The funding was only for eight weeks and could not be carried over.
- 8.20 There was a London wide access issue for dental care and this had been the case before the pandemic. Services were doing that they could to deal with it. There were still 35 urgent care hubs and these were operational from 8:00 a.m. till 1:00 a.m. and were treating 600 patients per day. However, they could only see people who were in pain. The eight weeks of additional funding was welcome but would not fully address the backlog. The Committee expressed concern at the backlog and the long waiting times for secondary care. It expressed its support for efforts to secure additional funding and improve access.

Estates Strategy Update

- 8.21 The Committee received a report on progress with the Estates Strategy. More than 50% of primary care accommodation had been assessed as unfit for purpose. There was a driving need for investment and the realisation of assets. The strategy was also about reinvestment of capital. The aim was to ensure that all primary care estates were fit for purpose but there was insufficient capital available currently. However, there had been some successful external bids for capital. It was important that there was system wide prioritisation covering the next three to ten years. NCL were looking to work with partners on a local and national basis.
- 8.22 The three-year indication of capital allowances was useful as it facilitated planning. There was a £20 million reduction in capital though and consideration was being given to clinical led prioritisation. It was expected that the capital shortfall would reduce. There was a need for ambition to be maintained and

external funding to be obtained. The Strategy would need to ensure that Primary Care and Primary Network (PCN) priorities reflected local needs and optimised work with local authorities. There had been few recent estates disposals because of the pandemic.

- 8.23 The Committee requested further information regarding terms of reference, how local concerns were fed into the forums, their relationship with the NCL Estates Board. Details of membership and access to minutes were also requested. They also requested an update on disposal of assets, including details of which estates had been sold and how the capital realised had been used. It was noted that there was a £40 million gap in funding for primary care. More work was needed on how this gap would be reduced. Further information was requested on how revenue fitted in with capital as well as to gain an understanding regarding capital receipts, including who they were retained by. It was important to avoid the selling estates to mitigate revenue pressures.

9. Budget Scrutiny

- 9.1 As part of the Council's governance arrangements for the development of the new Medium Term Financial Strategy, Overview and Scrutiny considered savings proposals that were presented to the December 2021 Cabinet. Following consideration by Cabinet, all four Scrutiny Panels met in December and January to scrutinise the draft budget proposals that fell within their portfolio areas. In addition, the Overview and Scrutiny Committee met on 13th January to consider proposals relating to Your Council/Priority X.
- 9.2 Cabinet Members, senior officers and finance leads were in attendance at each meeting to present proposals and to respond to questions from members. For some of the proposals, additional information was requested. This was considered by the Overview and Scrutiny Committee on 20th January, along with emerging recommendations from each Panel, ahead of final recommendations being agreed and referred to Cabinet.
- 9.3 Key recommendations from Overview & Scrutiny included:
- The Committee expressed concerns about slippage from previously agreed savings leading to additional pressure on growth budgets and sought reassurance from Cabinet about these risks.
 - The Committee scrutinised the site acquisition of the 'Wards Corner' site requesting that the Cabinet provide clarity about future investment to make the

market viable and recommended that any capital funding used if the Council was minded to carry out the CPO without the developer should be used for the maximum provision of council homes at council rents.

- A commitment was sought from the Cabinet to address existing inequities in tree coverage and recommended that the east of the borough be prioritised when planting new trees.
- A recommendation was made in support of additional investment into active travel, with a particular focus on cycling infrastructure.
- Concerns were raised about the significant delays experienced by residents in the installation of aids and adaptations and the consequent impact of this on health and well-being. A recommendation was made that the Cabinet give consideration to whether funding is sufficient in this area, including specifically on whether additional Occupational Therapists were required.
- The commitment by the Council to engage with the community regarding the MTFS proposals was welcomed. However, it was felt that more needed to be done to improve the accessibility of the MTFS documentation to promote more effective engagement with the local community.

- 9.4 The final recommendations from the Overview and Scrutiny Committee, were considered by Cabinet at its 8th February meeting. The response from Cabinet to all recommendations can be found via the following link:
<https://www.minutes.haringey.gov.uk/documents/s129919/Appendix%209%20Budget%20Scrutiny%20Recommendations%202021-22.pdf>

10. How to get involved

- 10.1 Public engagement and involvement is a key function of scrutiny and local residents and community groups are encouraged to participate in all aspects of scrutiny from the development of the work programme to participation in project work. For this purpose, all formal meetings of the Overview and Scrutiny Committee and the four scrutiny panels are held in public and everyone is welcome to attend.
- 10.2 As well as attending a scrutiny meeting, there are a number of ways in which local people can be actively involved in the scrutiny process:

Suggest a topic for review

- 10.3 Members of the public and community groups can suggest topics for possible scrutiny review. Please use the scrutiny suggestion form (Word, 52KB) to suggest a topic for inclusion within the scrutiny work programme.

Being a witness

- 10.4 Like parliamentary select committees, a range of individuals may be asked to give evidence to support scrutiny reviews. This may include service users and community stakeholders, as well as service providers, policy makers, managers and people who have some knowledge or expertise of the area under consideration.
- 10.5 The ways in which evidence is collected will vary, but may include online surveys, focus groups or public meetings. Details of current scrutiny projects and how you can participate can be viewed on the scrutiny consultation page.

Asking questions

- 10.6 The Overview and Scrutiny Committee or scrutiny panels may call a Member of the Cabinet and chief officer (such as a service Director) to answer questions on the performance, policy plans and targets for their portfolio or service. The Committee or relevant scrutiny panel may also call local NHS executives to account for policy and performance issues in the health sector. Representatives from other local public services (for example, police service, fire service, housing associations or Jobcentre Plus) may also be invited to scrutiny meetings where appropriate.
- 10.7 Members of the public can also raise questions about a subject being scrutinised and can submit written questions to be asked of executive councillors and chief officers called before the Overview and Scrutiny Committee or panels. 11.8 Questions should be sent in writing at least 5 clear working days in advance of the meeting. Questions can be sent by email or post to the Democratic Services Manager, or the appropriate committee or panel support officer.
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Further information

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