



**Haringey** Council

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## Special Regulatory Committee

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THURSDAY, 2ND JULY, 2015 at 7.00 pm HRS - CIVIC CENTRE, HIGH ROAD, WOOD GREEN, N22 8LE.

**MEMBERS:** Councillors Ahmet (Chair), Basu, Beacham, Bevan, Carroll (Vice-Chair), Carter, Doron, Gunes, Mallett, Marshall, Patterson, Ryan and Weston

### AGENDA

#### 1. **FILMING AT MEETINGS**

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#### 2. **APOLOGIES FOR ABSENCE**

#### 3. **URGENT BUSINESS**

It being a special meeting of the Committee, under Part 4, Section B, paragraph 17 of the Council's Constitution, no other business shall be considered at the meeting.

#### **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. NORTH LONDON WASTE PLAN (PAGES 1 - 218)**

To note the draft North London Waste Plan and proposed consultation period and to comment on two associated Memorandums of Understanding.

#### **6. STATEMENT OF COMMUNITY INVOLVEMENT (SCI) (PAGES 219 - 260)**

To note and provide comments on the draft revised Statement of Community Involvement.

#### **7. DATES OF FUTURE MEETINGS**

- 21 September.

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Wednesday, 24 June 2015



**Haringey Council**

<b>Report for:</b>	<b>Regulatory Committee 2<sup>nd</sup> July 2015</b>	<b>Item Number:</b>	
<b>Title:</b>	<b>North London Waste Plan</b>		
<b>Report Authorised by:</b>	<b>Lyn Garner, Director Regeneration, Planning and Development</b>		
<b>Lead Officers:</b>	<b>Matthew Patterson</b> Interim Head of Policy, Strategic Transport and Infrastructure <a href="mailto:Matthew.Patterson@haringey.gov.uk">Matthew.Patterson@haringey.gov.uk</a>  <b>Neil Goldberg</b> Planning Policy <a href="mailto:Neil.Goldberg@haringey.gov.uk">Neil.Goldberg@haringey.gov.uk</a>		
<b>Ward(s) affected: All</b>	<b>Report for Key Decision</b>		

## 1 The issue under consideration

1.1 This report introduces a consultation draft of the Joint North London Waste Plan (NLWP) and two Memorandums of Understanding (MOUs):

- Memorandum of Understanding for Joint Working with North London Boroughs and;
- Memorandum of Understanding for providing a frame work for co-operation between London Legacy Development Corporation (“Legacy Corporation”) and the North London Boroughs.

## 2 Cabinet Member introduction

2.1 The seven North London Boroughs (Barnet, Enfield, Waltham Forest, Hackney, Islington, Haringey and Camden), as Waste Planning Authorities (WPAs), are required to prepare a Waste Local Plan. Article 28 of the European Union (EU) Waste Framework Directive states that all member states must prepare a Waste Management Plan. The National Waste Management Plan for England, supported by the National Planning Policy for Waste (NPPW), identify that the National Waste Management Plan will be supported by each WPA’s Waste Local Plan and as such it is a statutory requirement to prepare this document.



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- 2.2 The NLWP's main purpose is to ensure that there will be adequate provision of suitable land (sites and areas) to accommodate waste management facilities of the right type, in the right place and at the right time up to 2032 to manage waste generated in North London.
- 2.3 The draft NLWP provides policies against which planning applications for waste development will be assessed, safeguards existing waste sites and allocates sites and areas with potential to accommodate waste facilities in the future.
- 2.4 The NLWP plans for all principal waste streams including:
- **Local Authority Collected Waste (LACW):** Waste produced by householders;
  - **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 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.
- 2.5 The NLWP has been prepared in accordance with the NPPW which provides detailed guidance specific to waste plan preparation and content, alongside considerations for the determination of planning applications for waste facilities and the London Plan which set waste apportionment targets for each London Borough
- 2.6 Once adopted by all the North London Boroughs, the NLWP will form part of the overarching planning framework (the 'Development Plan') 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 following documents in the submission of a planning application related to an existing or proposed waste facility:
- National planning policy and guidance;
  - The London Plan and Supplementary Planning Guidance;
  - The North London Waste Plan;
  - Other relevant Borough Local Plan documents including the Core Strategy, Development Management policies, Site Allocation Documents, Area Action Plans and any associated Supplementary Planning Guidance or Planning Briefs.

## 3 Recommendations





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### 3.1 That Regulatory Committee:

- Notes the draft North London Waste Plan at Appendix A and the proposed consultation period in respect thereof; and
- Is invited to make comment thereon:
  - the MoU at Appendix B with the other North London Boroughs, being Barnet, Camden, Enfield, Hackney, Islington and Waltham Forest, for the purpose of preparing the NLWP; and
  - the MoU at Appendix C to provide a framework for co-operation between London Legacy Development Corporation and the North London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest undertaking the North London Waste Plan; and

both of which will be reported to the Cabinet meeting on Cabinet resolution to enter into.

## 4 Alternative options considered

- 4.1 In line with the National Planning Policy Framework (paragraph 182) to ensure the NLWP is justified, a range of options have been tested to demonstrate that the North London Boroughs have considered reasonable alternatives and that the Plan follows the most appropriate strategy. An Options Appraisal Report (December 2014) considered 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). The findings of the Options Appraisal have been taken forward as 'preferred options' in this Draft NLWP Plan.
- 4.2 The three growth scenarios represent different population and economic factors that will affect the quantity of waste generated from households, businesses and services. The growth assumption options are:
- Option A: No Growth
  - Option B: Growth
  - Option C: Minimised growth
- 4.3 All the evidence and projections anticipate substantial population and economic growth in London over the next few decades. The Options Appraisal report concludes that Growth Assumption Option B: Growth is the most appropriate strategy for the Draft NLWP as it will provide the most accurate modelling scenario to project future capacity gaps.



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- 4.4 Growth Options A and C are not considered to be appropriate strategies as they do not represent the most credible estimate of growth in North London over the plan period.

**5 Background information**

- 5.1 On 1 November 2005 the Council's Executive agreed in principle to produce a joint waste plan. The Executive also resolved that authority be delegated to the Director of Environmental Services, in consultation with the Executive Member Enterprise and Regeneration to approve a MoU in order to agree detailed arrangements for the production of the joint document. On 19 December 2006 the Council's Executive resolved to "approve the preparation of the Joint Waste Development Plan Document" with the other North London Boroughs.
- 5.2 The North London Boroughs prepared a Waste Plan, undertook statutory consultation, and presented an Issues and Options Draft to Haringey's Cabinet on 20 November 2007. On 18th November 2008 Cabinet noted the extension to the preparation timetable and a submission draft was presented to Cabinet on the 8 February 2011.
- 5.3 On 31 August 2012 the Planning Inspector concluded that the Waste Plan did not comply with the legal requirements of the Duty to Co-operate and recommended that the North London Boroughs request he write his report recommending the non-adoption or the withdrawal of the plan.
- 5.4 On 12 February 2013 Cabinet resolved to recommend the Inspector write his report endorsing the non-adoption of the waste Plan. The same Cabinet meeting resolved "that the Local Authority should draw up the next version of the NLWP following regulations 18 and 19 of the 2012 regulations, while meeting the Duty to Cooperate."
- 5.5 The current plan delivers a revised draft addressing the recommendations made by the Inspector in 2013 and in particular the legal requirements of the Duty to Co-operate.

**6 Structure of the Draft North London Waste Plan**



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- 6.1 The stated aim of the NLWP is to “provide a planning framework that contributes to an integrated approach to the movement of materials up the waste hierarchy to support a greener London and move towards achieving net self sufficiency in the management of north London’s waste. It will provide sufficient sites for development of waste facilities that are of the right type, in the right place, and provided at the right time to help the north London boroughs meet their future waste management needs until 2031”.
- 6.2 The Spatial Strategy within the NLWP reflects the complexities of addressing waste issues in a large urban area where there are a number of competing land use requirements. The aim of the spatial strategy is to provide a network of waste sites across North London taking into account the principles of:-
- Places accessible by different modes of transport;
  - Close to waste sources;
  - Areas that can accommodate the co-location of facilities;
  - Places that provide the opportunity for the development of combined heat and power networks; and
  - The exclusion of areas that are unsuitable due to environmental and physical constraints.

### Calculating waste to be managed and capacity gap

- 6.3 The future requirements for waste management are calculated using a number of variables, specifically:-
- The amount of waste that will be generated of the plan period (growth assumption);
  - The amount of waste the NLWP will seek to manage (capacity requirement); and
  - How this waste will be managed (management strategy).
- 6.4 The London Plan provides a figure (apportionment target) for how much waste each borough is expected to manage during the plan period. The NLWP has taken the decision to manage more than this apportioned amount, and will be managing for Net Self Sufficiency: this approach is entirely consistent with National Guidance.
- 6.5 Using assumptions for the land take required to manage waste (tonnes of throughput per hectare) and the number of hectares within north London currently managing waste, and the anticipated growth rate, it is possible to predict the amount of land needed to manage waste in North London.



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6.6 This identifies a capacity gap of 16 hectares within the waste plan period of 2015 to 2031. Sites and areas which can be developed for waste facilities, and which will therefore fill this capacity gap are listed and discussed below.

## 7 Sites and Areas identified in the waste plan.

7.1 The purpose of safeguarding sites, and allocating sites and areas is to make provision for the identified capacity gap for built waste management facilities in north London. The sites and areas have been identified after an extensive site search and assessment process. The process of assessment has led to the inclusion of a number of sites and areas that most effectively satisfy the assessment criteria when considered against a range of environmental, economic and social factors and the spatial strategy.

### Safeguarded Sites

7.2 It is a requirement of the London Plan that existing waste management facilities are protected, and if an existing waste management site is lost to a non waste use, an additional compensatory site provision will be required which meets the maximum throughput that the site could have achieved.

Sites in Haringey that have been safeguarded by the Plan are:-

Site	Size in hectares	Current Use
Western Road Depot, Wood Green N22	0.3	Household Waste Amenity Site, Waste Transfer Station
81 Garman Road, Tottenham, N17	0.2	Household, Commercial and Industrial Waste Transfer Station
O'Donovan, 100a Markfield Road, Tottenham, N15	0.8	Physical Treatment Facility – the site is dealing with wood waste
44 White Hart Lane, Tottenham, N17	1.1	Metal Recycling Site (Vehicle Dismantler)
Brantwood House, 175 Willoughby Lane, Tottenham N17	1.1	Metal Recycling Site (Vehicle Dismantler)
O'Donovan, 82 Markfield Road, Tottenham N15	0.6	Household, Commercial and Industrial Waste Transfer station
Civic Amenity Site, Park View Road, Tottenham N17	0.1	Household Waste Amenity Site

(NB these sites are also considered in Haringey's Site Allocations DPD and Tottenham Area Action Plan DPD)



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### Sites Allocated

7.3 Sites are allocated after discussions with the land owner. Applications for waste uses on sites within the identified areas are required to demonstrate they meet a range of development criteria and are suitable for the use.

7.4 The consultation draft of the Waste Plan does not propose any new “sites” but instead promotes new “areas” for waste provision. .

### 7.5 **Areas identified in the plan to be allocated**

7.6 Areas are identified instead of sites to provide a larger amount of land and allow greater flexibility for delivery.

7.7 Areas are used where uses other than waste are still permissible, such as in employment areas, and further investigation is required. The plan envisages that waste provision within these identified areas will come forward through the planning application process, which will be used to determine the suitability of a site for waste use and the appropriate developable area. Allocating areas rather than sites alone is the preferred option for both landowners and waste operators. This approach is consistent with the NPPW and associated guidance.

7.8 Applications for waste uses on sites within the identified areas are required to demonstrate they meet a range of development criteria including the need for the facility and the suitability of the use on that site.

### Areas allocated within Haringey

Area	Size	Current use
Brantwood Road (SIL 3)	16.9	Industrial Estate surrounded by mainly residential properties, a sports field to the east and industrial uses to the north east.
Willoughby Lane (LEA 18)	1.1	Site occupied by industrial units and offices.
North East Tottenham (SIL 12)	15.4	Warehouses and Industrial units on site.



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Wood Green (LEA 19)	11.5	Industrial units on site. A railway line lies on the western boundary of site.
Friern Barnet Sewage Works (aka Pinkham Way)	5.93	Land is currently unused and has become overgrown with trees and vegetation. Pinkham Way and retail park to the north, industrial properties east, Golf Course south and a park and residential properties to the west.

## 8 Consultation

### Previous Consultation

- 8.1 The NLWP has been prepared following an initial 'launch consultation' on what the Plan ought to contain (consistent with requirements of Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012). This consultation exercise provided an opportunity for stakeholders and communities to comment on the proposed content of the Waste Plan. A report on the 'launch consultation' has been published on the NLWP website ([www.nlwp.net](http://www.nlwp.net)).
- 8.2 Subsequently a series of Focus Group workshops were held based around different themes. The Focus Group helped work towards a shared vision for the NLWP including key principles that informed the aim and objectives of the Plan and sites assessment criteria. A report of discussions is also available on the website
- 8.3 Evidence gathering has been underway since April 2013. It comprises a Data Study and Data Study Update, a Duty to Co-operate Protocol and Report. Further Evidence has been published to support this Draft Plan comprising a Sites and Areas Report, Options Appraisal and Consultation Statement. All of which will be available on the Haringey website when the NLWP is consulted on.

### Proposed Consultation

- 8.4 The proposed consultation will run for 6-8 weeks from July to August 2015
- 8.5 During the 6-8 weeks consultation events will be held in locations in each of the seven boroughs, near sites and areas where appropriate.
- 8.6 Groups local to the proposed sites and areas will be identified to consult with.



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## **9 Working Arrangements**

9.1 The Plan-making process is managed by Camden Council, on behalf of the North London Waste boroughs. The Waste Plan will consider the amount of waste that will need to be managed in the seven boroughs up to 2031. The Plan will consider options for managing all the types of waste that will be generated across the seven boroughs and will identify and safeguard sites for managing and recycling that waste using a mix of different technologies. The Plan will be drawn up under the planning regulations and will be subject to public consultation at each stage. The Plan will need to be ratified at key stages by each borough, ultimately including adoption as part of that Borough's Planning Policy.

### 9.2 Planning Officers' Group

The role of this group is to take ownership of the plan preparation process through a close working relationship with the Programme Manager, the consultants, Heads of Planning, and the Planning Members Group, and where necessary provide additional capacity as a working group.

### 9.3 Heads of Planning Group

The role of this group is to oversee the NLWP preparation process, to consider the guidance of the Planning Officers Group and to provide guidance to and have regard to any guidance from the Planning Members Group, and to agree the timetable, and budget of the NLWP and agree any necessary changes.

### 9.4 Planning Members Group

The role of this group is to oversee the plan preparation process, provide feedback in response to the guidance of the Heads of Planning, to provide guidance to the Heads of Planning Group and to make recommendations to Borough Cabinet or Full Council for approval where necessary.

9.5 It is proposed that the following be members of the respective groups:

- a) Planning Officers' Group: Neil Goldberg, currently lead officer on the Waste Plan
- b) Heads of Planning Group: Matthew Patterson, currently Interim Head of Policy, Strategic Transport and Infrastructure
- c) Members' Group: Councillor Alan Strickland, currently Cabinet Member for Housing and Regeneration





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## 10 Memorandums of Understanding

10.1 Cabinet Members will be asked to consider and agree two MOUs as follows and to provide delegated authority in respect of the agreement of any future MOUs.

10.2 **MOU 1 - Joint Waste Planning in North London** - This Memorandum of Understanding is an updated version of a Memorandum of Understanding entered into by all the North London Boroughs on 26<sup>th</sup> February 2007 which provides a framework for the preparation of the joint waste plan between the 7 North London Boroughs.

10.3 **MOU 2 - Duty to Co-operate-** This Memorandum of Understanding provides a framework for co-operation between London Legacy Development Corporation and the North London Boroughs undertaking the NLWP. The London Legacy Development Corporation is the planning authority for parts of the London Boroughs of Newham, Waltham Forest, Hackney and Tower Hamlets and is responsible for development management decisions and development plans, and therefore is a key stakeholder for delivery of the NLWP. The NLWP will identify sites for waste management use and set out policies for determining waste planning applications.

## 11 Next Steps

11.1 The draft Joint North London Waste Plan is on the cabinet agenda for July 2015. A decision is needed by July to enable the 6-8 weeks consultation to start on July 31<sup>st</sup> 2015. Below is an anticipated timetable setting out the progress of this document.

Tasks	Time
Launch consultation (Regulation 18)	Spring 2013
Consultation on draft plan (Regulation 18)	Summer/Autumn 2015
Consultation on proposed submission plan (Regulation 19)	Summer 2016
Submission (Regulation 22)	Autumn 2016
Public hearings	Winter 2016/17
Inspector's report	Summer 2017
Adoption	Autumn 2017

11.2 Comments made during the consultation on this draft NLWP will be taken into consideration and will help to inform preparation of the Proposed Submission NLWP to be published under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Proposed Submission Plan will be the version of the NLWP that the Boroughs intend to submit to the Secretary of State for examination. In accordance with statutory requirements, this document will be published before it is submitted to provide an opportunity for stakeholders to submit representations on the soundness of the Plan and legal and procedural compliance.





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11.3 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.

**12 Comments of the Chief Finance Officer and financial implication**

12.1 The cost of preparing this report, the documents it refers to and the consultation recommended can be contained within existing budgets.

**13 Comments of the Assistant Director of Corporate Governance and legal implications**

13.1 The Assistant Director of Corporate Guidance has been consulted on the preparation of this report and comments as follows.

13.2 The NLWP, when adopted, will form part of the statutory development plan against which any subsequent applications for planning permission within the relevant areas would be tested.

13.3 That being the case, there is a formal process set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 to be complied with, the first stage of which is the Regulation 18 consultation with such of the specific consultation bodies as the Council consider may have an interest in the subject of the proposed AAPs, along with such of the general consultation bodies as the Council considers appropriate and such residents or other persons carrying on business in the Council's area from which the Council considers it appropriate to invite representations. This exercise should also be carried out in accordance with the Council's Statement of Community Involvement (updated February 2011) and currently under review.

13.4 There is a requirement that the NLWP must be in conformity with the London Plan and in preparing this document, the Council must take into account any representation made to them in response to the Regulation 18 consultations.

13.5 Under the Localism Act 2011 there is placed on plan making authorities a statutory duty to co-operate with adjoining authorities and prescribed bodies and persons in the preparation of development plan documents and local development documents. This duty requires active and constructive engagement with those parties and to have regard to the activities of those parties.



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13.6 Thereafter the documents must be published pursuant to Regulation 19 by the Council, together with other “proposed submission documents”, before they can be submitted to the Planning Inspectorate for examination. This provides a formal opportunity for the local community and other interests to consider and comment on the documents, which the Council would like to adopt.

13.7 The Supreme Court has recently endorsed the following general principles of consultation:

- That consultation must be at a time when proposals are still at a formative stage;
- That the proposer must give sufficient reasons for any proposal to permit intelligent consideration and response;
- That adequate time must be given for consideration and response; and
- That the product of consultation must be conscientiously taken into account in finalising any statutory proposals.

13.8 In short, in order to achieve the necessary degree of fairness, the obligation is to let those who have a potential interest in the subject matter know in clear terms what the proposal is and exactly why it is under positive consideration, telling them enough (which may be a good deal) to enable them to make an intelligent response. The obligation, although it may be quite onerous, goes no further than this.

## **14 Equalities and Community Cohesion Comments**



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14.1 The Council has a public sector equality duty under the Equalities Act (2010) to have due regard to:

- tackle discrimination and victimisation of persons that share the characteristics protected under S4 of the Act. These include the characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex (formerly gender) and sexual orientation;
- 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.

14.2 An initial Equalities Impact Assessment (EqIA) has been undertaken and found that there was no negative impact from the plans on those with protected characteristics. The waste site selection process has taken into account the proximity of sensitive receptors (such as schools and hospitals) to minimise the impact on vulnerable sections of the community. A full EqIA is not needed.

## **15 Head of Procurement Comments**

15.1 Not applicable

## **16 Policy Implication**

16.1 Haringey's Corporate Plan sets out the Council's strategic direction from 2015 to 2018. With the vision of 'Building a Stronger Haringey Together', the Corporate Plan guides the work of all Council programmes. The overarching theme is that everyone who lives in Haringey will have the opportunity to lead a successful and fulfilling life.

16.2 The Corporate Plan 2015-18 explains the priorities for the borough, and how the Council will achieve these priorities. Priority 3 encourages a clean, well maintained and safe borough where people are proud to live and work. The NLWP will help achieve this priority, providing the waste planning framework against which applications for waste development will be assessed across the plan area.

16.3 The NLWP is therefore consistent with the existing Corporate Plan and the emerging Corporate Plan.

## **17 Reasons for seeking Cabinet approval**



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17.1 The seven North London Boroughs (Barnet, Enfield, Waltham Forest, Hackney, Islington, Haringey and Camden), as Waste Planning Authorities (WPAs), are required to prepare a Waste Local Plan. Article 28 of the European Union (EU) Waste Framework Directive states that all member states must prepare a Waste Management Plan.

17.2 The main purpose is to ensure that there will be adequate provision of suitable land (sites and areas) to accommodate waste management facilities of the right type, in the right place and at the right time up to 2032 to manage waste generated in North London. The draft NLWP also provides policies against which planning applications for waste development will be assessed, safeguards existing waste sites and allocates sites and areas with potential to accommodate waste facilities in the future.

**18 Appendices**

- Appendix A – The Draft NLWP
- Appendix B – Memorandum of Understanding for Joint Working with North London Boroughs;
- Appendix C – Memorandum of Understanding for providing a frame work for co-operation between London Legacy Development Corporation (“Legacy Corporation”) and the North London Boroughs

**19 Local Government (Access to Information) Act 1985**

The following documents were used in the preparation of this report:

- National Planning Policy Framework 2012
- National Planning Policy for Waste 2014



**North London Waste Plan**

**Draft May 2015**

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## FOREWORD

As a group of seven North London Boroughs we are collaborating together to find the best possible solutions for the waste and recycling that is generated in our area. Now we want to hear what you think.

It is widely recognised that as a society we need to reduce our reliance on putting waste in landfill sites because that contributes to carbon emissions. Instead, we need to manage more of the waste we produce closer to where it arises and in better ways. In order of preference we should reuse, recycle, compost and, where none of these are possible, recover energy from the waste we produce.

The North London Waste Plan is an important stage in this process for our group of Boroughs. It uses the latest evidence about waste generated in our area to plot out a path to enable higher recycling levels to be achieved and to reduce reliance on other areas to treat our waste. It builds on the ability of existing waste sites to deal with waste and identifies new suitable sites and areas where waste facilities could be located. It sets out a number of planning policies against which applications for new waste facilities will be assessed.

Having the right infrastructure in place for waste and recycling is a vital ingredient for the proper functioning of our city and this is especially the case with the expected increase in housing and employment in North London. So we need to plan for how we deal with our waste in the same way that we plan for the proper provision of housing, open spaces, schools and transport. Waste facilities can also create jobs, produce energy and provide important resources for reuse in other processes. This contributes to a more circular economy in which materials can be reused rather than disposed of.

Now it's your opportunity to let us know what you think of the options facing the Boroughs and how we are proposing to move forward. We welcome your input and will consider all comments made when we draw up the next version of the plan.

Cllr Toby Simon

Chair North London Waste Plan Planning Members Group



## 1. Introduction and Background

### What is the North London Waste Plan?

1.1. 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'). Figure 1 shows the North London Waste Plan area. The NLWP will cover the period 2017 to 2032 and, once adopted, it will form part of the statutory Development Plan for these areas. The NLWP is identified in the Local Development Scheme for each of the Boroughs.

1.2. 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 2032 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.

1.3. The key elements of the NLWP are:

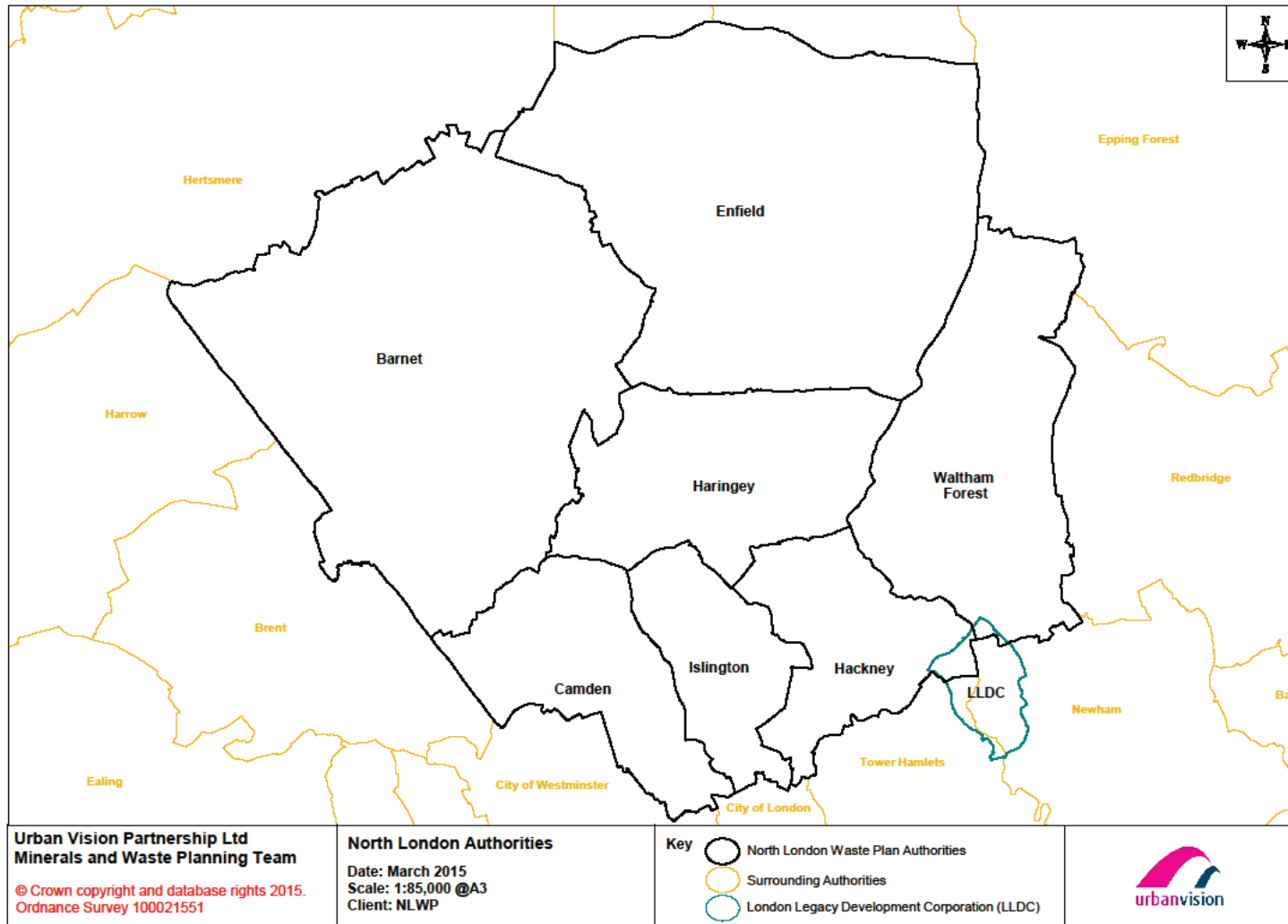
**The Aim and Objectives:** These are overarching principles which have steered the development of the NLWP.

**The Spatial Strategy:** This sets out the physical and planning components that influence the Plan and identifies opportunities and constraints for waste planning in North London.

**The Provision for North London's Waste to 2032:** 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 set out policies through which the aims and objectives, waste management strategy and spatial strategy will be delivered. The policies provide the waste planning framework against which applications for waste development will be assessed across the plan area.

Figure 1: North London Plan Area



1.4. The NLWP plans for all principal waste streams including:

- **Local Authority Collected Waste (LACW):** Waste produced by householders;
- **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 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?**

1.5. The seven North London Boroughs, as Waste Planning Authorities (WPAs) are required to prepare a Waste Local Plan. Article 28 of the European Union (EU) Waste Framework Directive states that all member states must prepare a Waste Management Plan. The National Waste Management Plan for England, supported by the National Planning Policy for Waste (NPPW), identify that the National Waste Management Plan will be supported by each WPA's Waste Local Plan and as such it is a statutory requirement to prepare this document.

1.6. The NLWP must be 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 National Planning Practice Guidance (NPPG) also set guidance on how Local Plans should be prepared and what they should contain. The National Planning Policy for Waste (NPPW) provides detailed guidance specific to waste plan preparation and content, alongside considerations for the determination of planning applications for waste facilities.

1.7. Once adopted, the North London Waste Plan (NLWP) will form part of the 'Development Plan' for 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 and consistent with other documents

in borough Local Plans. The NLWP should be read alongside other relevant policies within the wider Development Plan.

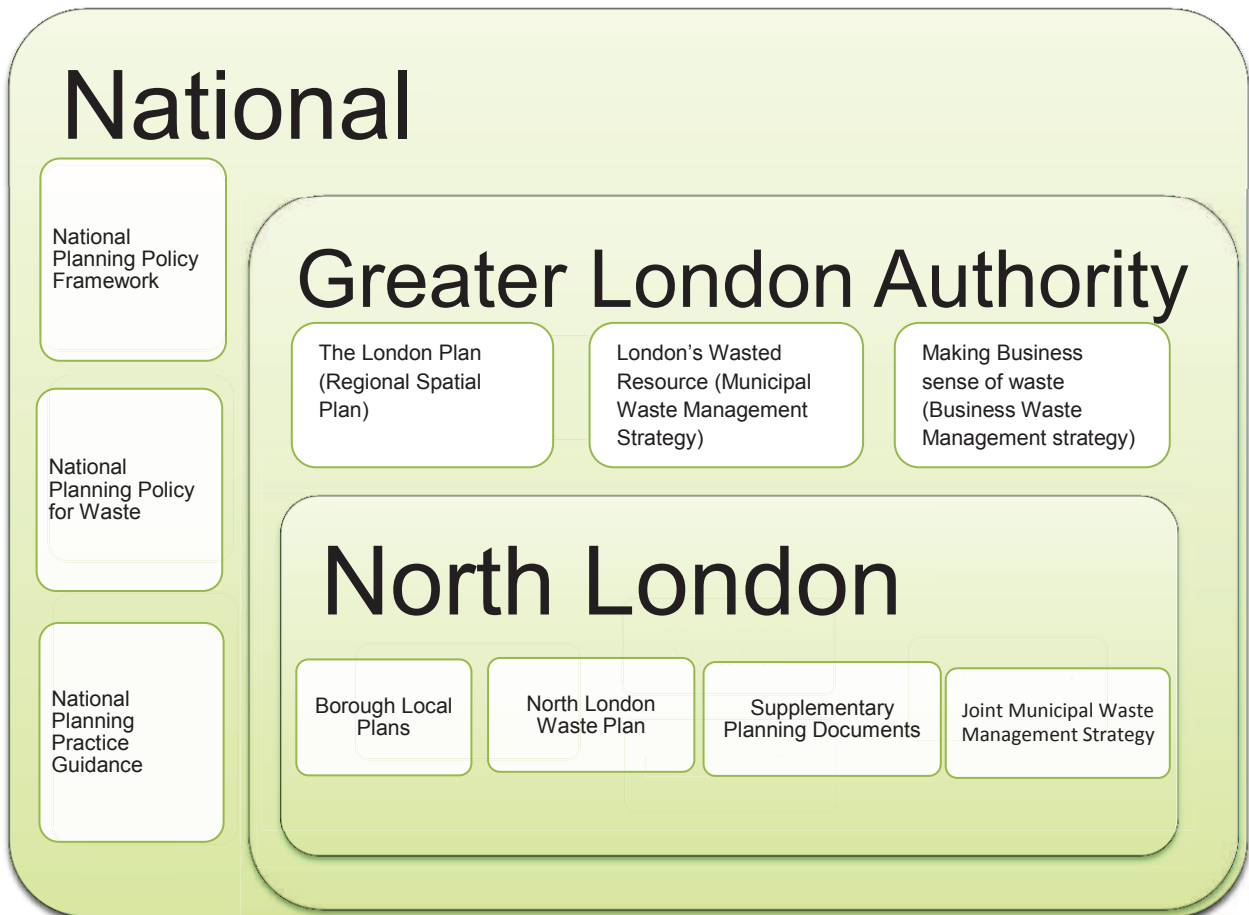
- 1.8. The London Plan contains a range of planning policies which the NLWP has to be in general conformity with. Importantly, it also projects how much LACW and C&I waste is likely to be generated in the capital over the next 20 years and apportions an amount of these two waste streams to each borough. Through each borough meeting their apportionment targets, London will dramatically reduce its reliance on landfill and move towards being self-sufficient. The North London Boroughs have pooled their apportionment and will meet it collectively through existing sites and land allocated in the NLWP.
- 1.9. Each of the seven boroughs has an adopted Core Strategy as part of their Local Plan; these contain an overarching policy on sustainable waste management. The Core Strategies provide the borough-wide strategic policy direction for the development of the NLWP and, in conjunction with this, the NLWP will 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**



- 1.10. In addition to the national and regional planning policies, there are also three waste strategies which impact on the development on the NLWP. These are the North London Waste Authority's (NLWA) Joint Municipal Waste Management Strategy (JMWMS); and the London Mayor's Waste Management Strategies "London's Wasted Resource" (on the management of municipal waste) and "Making Business Sense of Waste" (a business waste management strategy).
- 1.11. The North London Waste Authority (NLWA), which is the Waste Disposal Authority for the constituent boroughs, is a key stakeholder. The NLWA is responsible for managing the waste collected by the North London boroughs, in particular household waste but also some waste from smaller businesses; collectively this is known as Local Authority Collected Waste (LACW). The NLWP is required to ensure there is adequate provision for the disposal and recovery of this waste stream.
- 1.12. Each of these strategies contains recycling targets for Local Authority Collected Waste (LACW) and Commercial & Industrial (C&I) waste which inform policies within the London Plan. The recycling targets for LACW are linked to those set nationally which in turn reflect the requirements of the EU Waste Framework Directive. These targets have been used to inform the work on the NLWP Waste Data Study, and further information on how the plan will deal with these is set out in Chapter 4.
- 1.13. Figure 3 below shows the hierarchy of planning guidance, strategies and where the NLWP sits within this.

Figure 3: Hierarchy of Planning Guidance Policies and Strategies



1.14. 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 following documents in the submission of a planning application related to an existing or proposed waste facility:

- National planning policy and guidance;
- The London Plan and Supplementary Planning Guidance;
- The North London Waste Plan;
- Other relevant Borough Local Plan documents including the Core Strategy, Development Management policies, Site Allocation Documents, Area Action Plans and any associated Supplementary Planning Guidance or Planning Briefs.

### **What is involved in preparing the North London Waste Plan?**

- 1.15. 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 is 'sound'. The early stages of the preparation of the NLWP form a key part of demonstrating that these requirements have been met.
- 1.16. 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.
- 1.17. In addition, the North London Boroughs will work 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 the North London Boroughs of Hackney and Waltham Forest. 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. In carrying out their responsibilities under the NPPW, the North London Boroughs are engaging with other planning authorities in the country which import waste from North London including the LLDC area. 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. The NLWP cannot directly allocate sites/areas within the LLDC area as this is the responsibility of the LLDC as local planning authority.
- 1.18. 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 and their potential in meeting the capacity gap identified in the North London Waste Plan and related London Plan waste apportionment for each Borough. 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.

- 1.19. 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 and the Duty to Co-operate Protocol](#).
- 1.20. The legal and procedural requirements that the NLWP must meet are set out in the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. The key stages in the 2012 Regulations are:
  - Initial consultation on what the Plan should contain and work on evidence gathering leading to production of a set of policies in the draft Plan (Regulation 18);
  - Publication of Proposed Submission Plan (Regulation 19);
  - Submission of Local Plan to Secretary of State for examination by an Independent Inspector (Regulation 22);
  - Examination of Local Plan (Regulation 24); and
  - Adoption (Regulation 26).
- 1.21. At the heart of national policy (the NPPF) is the presumption in favour of sustainable development and policies in the NLWP must reflect this presumption. The NLWP must meet the soundness tests as set out in paragraph 182 of the NPPF. These require the NLWP to be:
  - Positively prepared (meet objectively assessed development needs of the area);
  - Justified (set out the most appropriate strategy based upon the evidence);
  - Effective (deliverable and address cross boundary issues);
  - Consistent with national policy.
- 1.22. The NLWP is accompanied by other relevant supporting assessments such as a Sustainability Appraisal (SA) (incorporating the requirements of the SEA Directive), Habitats Regulation Assessment (HRA), and Equalities Impact



Assessment (EqIA). These assessments form a key element of 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.

- 1.23. The NLWP must also be accompanied by a Strategic Flood Risk Assessment (SFRA). An SFRA for North London was prepared in 2008 to map flood risk zones and assess existing flood defences. In addition Camden, Enfield, Hackney, Haringey and Waltham Forest have prepared more detailed 'Level 2' SFRAs in support of the development of their Local Plans. All boroughs have prepared Surface Water Management Plans.
- 1.24. Flood risk and protection of groundwater was considered as part of the site/area search exercise using data available from the Environment Agency. The findings of the assessments are recorded in the site pro-formas. Sites and areas being taken forward in the draft NLWP have been subject to sequential testing and the results of this reported in the Sites and Areas Report.

**What stage is the NLWP at?**

- 1.25. This is the draft NLWP produced as part of the initial stages of NLWP preparation (Regulation 18). It has been prepared following an initial 'launch consultation' on what the Plan ought to contain (consistent with requirements of Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012). This consultation exercise provided an opportunity for stakeholders and communities to comment on the proposed content of the Waste Plan. A report on the 'launch consultation' has been published on the NLWP website ([www.nlwp.net](http://www.nlwp.net)).
- 1.26. Subsequently a series of Focus Group workshops were held based around different themes. The Focus Group helped work towards a shared vision for the NLWP including key principles that informed the aim and objectives of the Plan and sites assessment criteria. A report of discussions is also available on the [website](#).
- 1.27. Evidence gathering has been underway since April 2013. It comprises a Data Study and Data Study Update, a Duty to Co-operate Protocol and Report. Further Evidence has been published to support this Draft Plan comprising a Sites and Areas Report, Options Appraisal and Consultation Statement.
- 1.28. The purpose of this consultation is to provide an opportunity for stakeholders and communities to comment on the draft Plan.

### What happens next?

- 1.29. Comments made during the consultation on this draft NLWP will be taken into consideration and will help to inform preparation of the Proposed Submission NLWP to be published under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Proposed Submission Plan will be the version of the NLWP that the Boroughs intend to submit to the Secretary of State for examination. In accordance with statutory requirements, this document will be published before it is submitted to provide an opportunity for stakeholders to submit representations on the soundness of the Plan and legal and procedural compliance.
- 1.30. 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 indicative timetable for the Plan is as follows:

**Table 1: NLWP Timetable**

Launch consultation (Regulation 18)	Spring 2013
Consultation on draft plan (Regulation 18)	Summer/Autumn 2015
Consultation on proposed submission plan (Regulation 19)	Summer 2016
Submission (Regulation 22)	Autumn 2016
Public hearings	Winter 2016/17
Inspector's report	Summer 2017
Adoption	Autumn 2017

## 2. Setting the Scene

2.1. The way in which we deal with our waste has important environmental, social and economic consequences. 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*'<sup>1</sup>. 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 dimensions 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. This section looks at the setting of North London and how this context influences the Plan.

### Geographical Extent

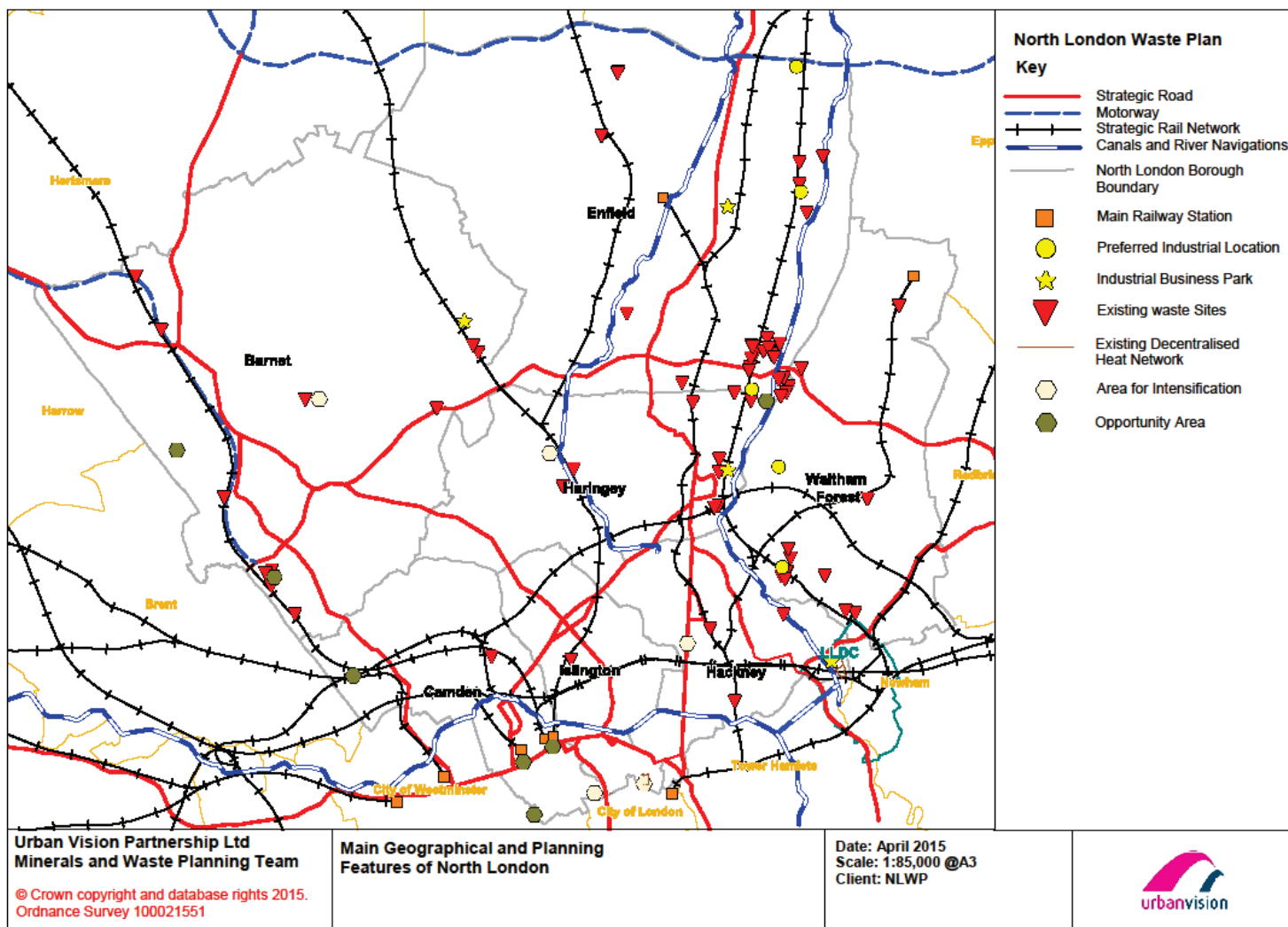
2.3. The North London Boroughs cover a large swathe of London from the inner city into the Green Belt of outer London. The geographical extent takes in both the inner London Boroughs of Camden, Hackney and Islington, and the outer London Boroughs of Barnet, Enfield, Haringey and Waltham Forest (see Figure 4). In the south, the Plan area borders on the City of London and the City of Westminster. To the north of the Plan area boundary lies Hertfordshire and Essex. The area is bounded by the London Boroughs of Brent and Harrow to the west and the London Boroughs of Tower Hamlets and Redbridge to the east. The land within the North London Boroughs spans an area of 293 square kilometres. The geographical characteristics of North

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<sup>1</sup> Brundtland Commission, 1987 (Resolution 42/187 of the United Nations General Assembly)

London are a key element in both the Spatial Strategy (see section 4) and the sites/areas assessment criteria (see section 8).

Figure 4: Main geographical and planning features of North London



## **Population Characteristics**

- 2.4. The North London area is one of the most densely populated areas in the UK. Recent statistics show that the population has risen from 1.6 million in 2002 to an estimated 1.89 million in 2012, and that the population continues to grow at a rate above the national average. 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 (see section 6 on future waste management requirements).
- 2.5. The highest density is in the inner London boroughs of Islington (the most densely populated local authority in the UK), 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. Density of population and the built environment has an influence on the amount of waste generated but also on competition for land and the availability of sites suitable for new waste facilities (see section 7 on sites and areas).
- 2.6. 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 London Boroughs which, consequently, have fewer gardens 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 6 on future waste management requirements).

## **Health**

- 2.7. There are contrasting levels of life expectancy across North London. The outer London boroughs of Barnet and Enfield report life expectancies that are higher than the national average. In contrast the five other Boroughs report male life expectancy to be lower than the average for England, while the same is true of females in Islington and Waltham Forest. 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 Draft Plan.

## **Socio-Economic**

- 2.8. 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 than the national average. However the cost of living in all Boroughs is high. Four Boroughs (Hackney, Haringey, Islington and Waltham Forest) contain wards that are amongst the 20 most deprived areas in England. Maximising economic benefits by utilising waste as a resource is one of the objectives 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' 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. Economic growth in North London is predicted to result in greater amounts of waste being generated. This is due to more people in jobs generating waste, although the amount of waste created per person is expected to stay the same.

### **Environment**

- 2.9. 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 Green Belt designations in the outer areas together with areas of agricultural land in Barnet and Enfield.
- 2.10. 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.
- 2.11. The Lee Valley contains an internationally important wetland habitat (Ramsar site) as the reservoirs and old gravel pits support internationally important numbers of wintering birds as well as other nationally important species. In the Lee Valley and in other parts of North London there are six Sites of Special Scientific Interest (SSSI). There are also 21 Local Nature Reserves and 307 Sites of Importance for Nature Conservation of varying grades. Given the concentration of industrial land in the Lee Valley this poses challenges here and elsewhere for development to take into account key biodiversity issues set out in Borough Biodiversity Action Plans.
- 2.12. The heavily developed and built up nature of North London coupled with intense competition for land and protected areas such as greenbelt presents a significant challenge in planning for waste. There are planning constraints near areas protected for their environmental value for some types of development which are perceived to create more environmental risk and harm

the amenity of the local area. Harm to amenity includes such factors as noise, dust and increased traffic.

- 2.13. 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 principal groundwater source beneath North London is the chalk aquifer which lies relatively close to the surface. A historically high level of groundwater abstraction means that water levels may be some way below the top of the aquifer; nevertheless 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.
- 2.14. 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 London boroughs where offices predominate. There may also be occurrences of derelict or previously developed land which remains undeveloped today. However 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.
- 2.15. Air quality within North London is uniformly poor as a result of high levels of nitrogen dioxide and dust (NO<sub>2</sub> and PM<sub>10</sub> 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 the entire Borough in each case.
- 2.16. The NLWP includes strategies and policies to protect environmental assets and amenity.

### **Transport**

- 2.17. North London benefits from good access to the strategic road network as the M1 and M11 run through the Plan area and the M25 follows the northern boundary of the Plan area. 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 congestions at off-peak as well as peak hours, despite the fact that part of the area lies within the Mayor's congestion charging zone.



- 2.18. Car ownership levels are low compared to the national average in the inner Boroughs but average in the outer Boroughs.
- 2.19. Three main train lines terminate in the plan area at Euston, St Pancras and Kings Cross all in Camden, and Islington's Farringdon Station is set to become a major transport hub following implementation of Crossrail. The North London Line (NLL) is a nationally important freight route providing movement of material across the area. A railhead at Hendon in Barnet transports waste out of London.
- 2.20. 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.
- 2.21. A key objective of the Plan is dealing with more of its own waste locally and thus contributing to the target of making London self-sufficient as required by the Mayor's waste apportionment targets. However, it is likely that some waste will continue to cross boundaries for treatment or disposal where commercial contracts are in place or where there is the most appropriate waste facility (see section 4 on cross boundary movements). Opportunities for using sustainable modes of transport is a key element of the Spatial Strategy.

### **Land Use**

- 2.22. Across North London as a whole the predominant land use is housing. 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, cultural, economic and administrative core. The Upper Lee Valley on the east of the area is a concentrated area of industrial activity. Each borough contains areas of industrial land that are designated for this purpose. The London Plan designates Strategic Industrial Locations (SILs) and Local Plans can identify Locally Significant Industrial Sites (LSISs) and other industrial/employment designations.
- 2.23. As mentioned in the environment section above, there are expanses of open space and Green Belt across the area; and agricultural land in the north of the Plan area.
- 2.24. There are many zones of historic conservation interest including over 14,000 listed buildings and 172 conservation areas and these are already protected by Local Plan policies. Historic assets are also considered in the sites/areas assessment criteria (see section 7).

## Climate Change

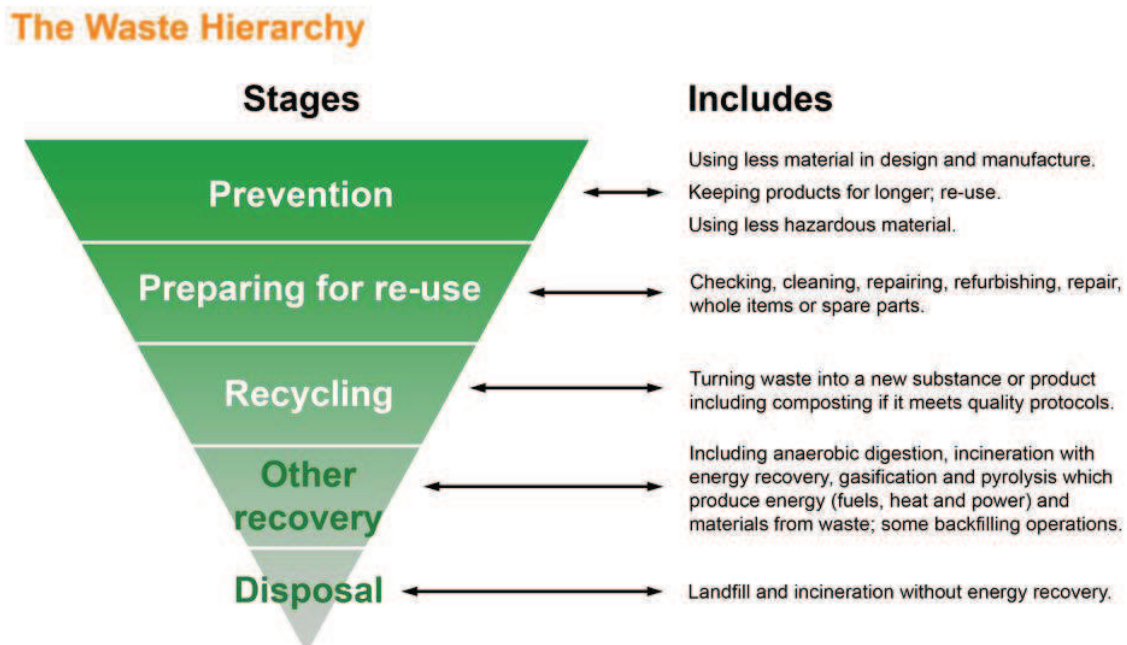
- 2.25. The North London Boroughs are all focused on the challenges posed by climate change. Borough strategies are driven by the requirements to mitigate and adapt to all effects of climate change. The NLWP aims to deliver effective waste and resource management which makes a positive and lasting contribution to the sustainable development of London and to combating climate change.
- 2.26. All Boroughs have lower CO<sub>2</sub> emissions per capita than the national average, with the exception of Camden where levels are elevated by the concentration of commercial and other non-domestic activities. However all Boroughs have significantly lower per capita CO<sub>2</sub> emissions from road transport when compared to the national average. This is particularly apparent in Camden, Hackney, Haringey, Islington and Waltham Forest. Per capita CO<sub>2</sub> emissions from the domestic sector are below the national average.
- 2.27. The NLWP seeks to reduce the reliance on disposal to landfill sites outside London as this contributes to CO<sub>2</sub> emissions from transport as well as the decomposing buried waste. It is recognised that waste management facilities will continue to generate CO<sub>2</sub> emissions but the priority will be to implement policies and direct new development to sites which deliver a better overall environmental outcome and by offsetting greenhouse gas emissions where this is technically and economically feasible, helping to improve identified environmental issues.
- 2.28. Parts of all Boroughs are under threat from surface water (and potentially sewer) flooding because of the extensive urbanised areas and because the surface geology is predominantly impermeable clay.
- 2.29. On the east side of the area a number of tributaries flow into the River Lea while parts of Barnet drain into the River Brent to the west. The greater occurrence of urban flood events over the last sixty years and climate change means that this could become more of a threat in the future.

### 3. Aims and Objectives

#### Aim of the North London Waste Plan

- 3.1. This section sets out information regarding the aim and supporting objectives for the NLWP. Each of the seven Borough Core Strategies contains a vision for their area, and the aim of the NLWP links to the delivery of that vision. The NLWP therefore does not include a vision, but instead a single overarching aim and a number of objectives to deliver that aim. Comments made at the focus group held in June 2014 and comments made through the initial consultation on the development of the NLWP undertaken between April and June 2013 have been considered. 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
- 3.2. 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. The NLWP aim and objectives reference and integrate the Waste Hierarchy which is shown in Figure 5.

Figure 5: Waste Hierarchy



- 3.3. The aim of the draft NLWP is:

**Aim of the NLWP**

“To move towards achieving net self-sufficiency in the management of North London’s 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 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 future waste management needs by 2032”.

**Question 1: Do you agree with the proposed Aim for the draft NLWP? If not, please suggest an alternative.**

**Strategic Objectives**

3.4. 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, 3, 5 and 7

SO2. To ensure there is sufficient suitable land available to meet North London’s waste management needs through safeguarding and allocation policies;  
Met through Policies 1, 2, 3, 4 and 5

SO3. To achieve net self-sufficiency 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 5

SO4. 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;  
Met through Policy 6

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, 3 and 6

SO6. To provide opportunities for North London to contribute to the development of low carbon industries and decentralised energy;  
Met through Policy 7

SO7. To support the use of sustainable forms of transport and minimise the impacts of waste movements including on climate change;  
Met through Policy 6

SO8. To protect, and where possible enhance, North London's natural environment, biodiversity, cultural and historic environment.  
Met through Policy 6

**Question 2: Do you agree with the proposed Draft Objectives for the draft NLWP? If not, please suggest an alternative and/or additional objectives.**

## 4. Spatial Strategy

### Purpose

- 4.1. A spatial strategy 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.
- 4.2. This spatial strategy provides the strategic framework for the detailed policies of the NLWP and the allocation of suitable sites. It reflects the complexities and realities of planning for waste in a large urban area where there are a number of competing land uses. It provides the basis for balancing various priorities, opportunities and constraints, in particular the availability of sites/areas to achieve a deliverable distribution of waste management sites, whilst bringing social, economic and environmental benefits of new waste management facilities to North London.
- 4.3. The NLWP spatial strategy was developed and presented to a focus group of key stakeholders in June 2014. Following consideration of the comments received from the focus group, the spatial strategy has been revised and is presented below. Key elements of the spatial strategy are reflected in the sites/areas assessment criteria.
- 4.4. The spatial strategy also takes account of the Plan's evidence base and objectives, regional and national guidance and the views of stakeholders, as well as the requirements set out in National Planning Policy for Waste (NPPW), specifically the section on 'Identifying suitable sites and areas' (NPPW paragraphs 4-6).
- 4.5. The NLWP spatial strategy is to:
  - A. Make use of existing sites and identify most suitable new sites/areas
  - B. Seek a network of waste sites across North London
  - C. Encourage co-location of facilities
  - D. Provide opportunities for decentralised heat and energy networks
  - E. Reduce impact on local amenity
  - F. Support sustainable modes of transport
  - G. Reduce exports of waste
- 4.6. Figure 4 in Section 2 shows the main infrastructural, geographical and planning designations which have an influence on planning for waste in North London. Figure 6 below shows the Spatial Strategy in map form.

4.7. Figure 4 in Section 2 shows the main infrastructural, geographical and planning designations which have an influence on planning for waste in North London. Figure 6 above shows the Spatial Strategy in map form.

**A. Make use of existing sites**

4.8. 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 (see Schedule 1 in Appendix 1 for a full list of existing sites). 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. Figure 6 above and Figure 9 (in section 5) shows that most of the existing sites are to the east of the North London area in the Lee Valley corridor.

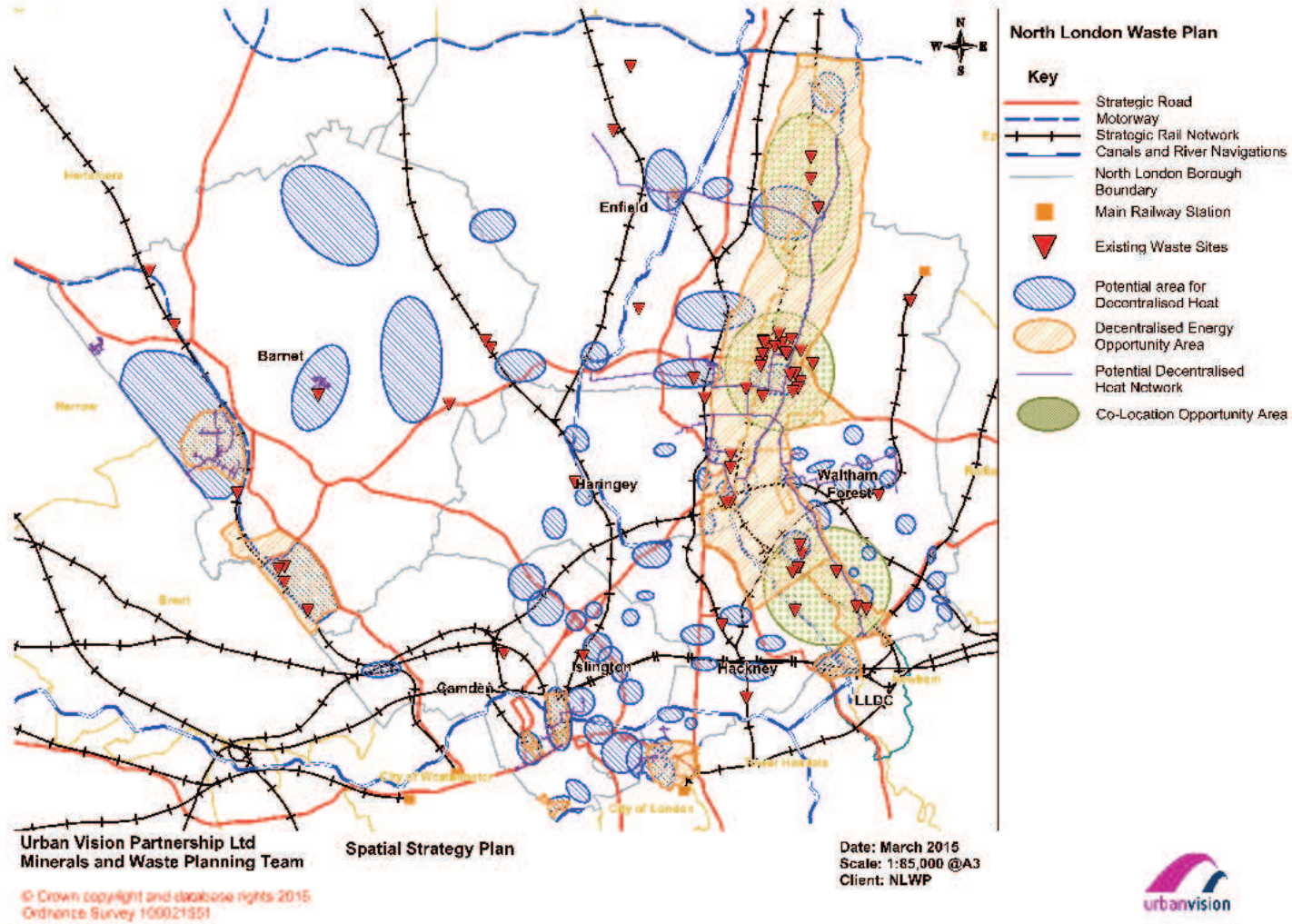
4.9. Three existing sites are known to be planning capacity expansion or upgrades to existing facilities (see Expansion of existing Waste Management Facilities in Section 7). Most existing sites do not have any current plans to expand capacity or change their operations but the North London Boroughs support, in principle, the upgrading of existing facilities.

**B. Seek a network of waste sites across North London**

4.10. Figure 6 shows that the majority of existing waste sites are located to the east of the area in the Lee Valley corridor. This reflects the nature of the area with some boroughs having a larger supply of industrial land, where waste uses are generally more acceptable. The geography of North London has influenced the spread of waste sites. For example, some areas such as the protected green belt in the north will restrict built waste facilities, whilst larger and co-located facilities are more likely to in areas with similar existing uses away from urban centres and sensitive receptors. Policies 2 and 3 build on the existing network of waste sites by identifying new sites and areas which are suitable for waste uses.



Figure 6: Spatial Strategy



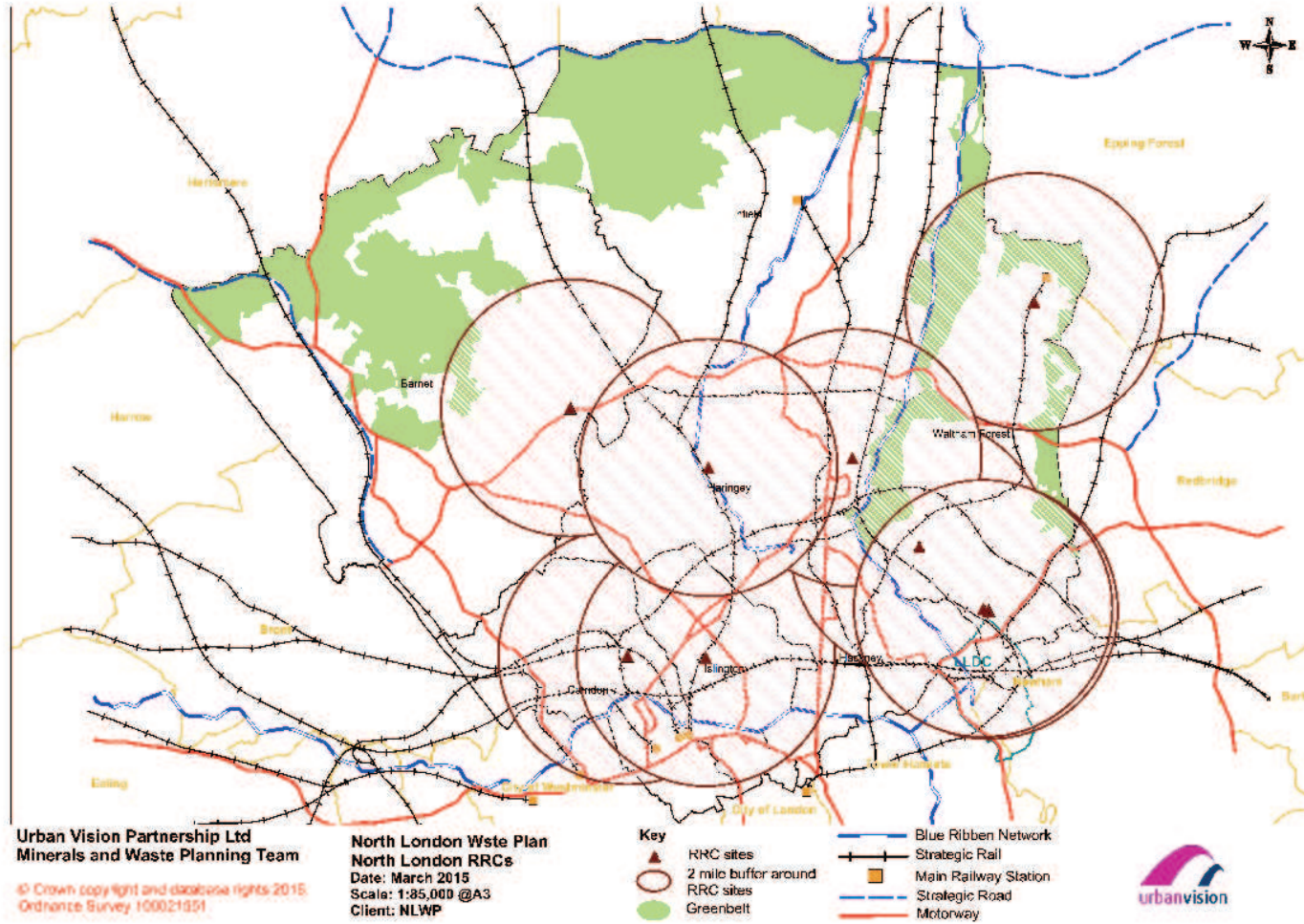


- 4.11. While it is desirable for waste to be treated as close as possible to its source, the complexity of the waste management business poses challenges. Different types of waste require different types of management and the most suitable facility may not be the nearest and may be outside North London. Waste sites tend to treat particular waste streams such as LACW or C&D and so there are networks of facilities for particular waste streams by treatment method, for example the NLWA has a network of sites across North London to manage LACW, focused on one main facility at Edmonton EcoPark. Contracts for commercial waste and for construction waste will require vehicles to travel to the nearest facility managed by or available to that particular operator.
- 4.12. Given that the predominant transport mode for waste movements is road, it is desirable to reduce the distance travelled. Where demand arises, opportunities to seek a wider network of waste sites for different waste streams across the area are supported through Policy 4: Unallocated Sites.
- 4.13. Figure 7 shows the current network of local re-use and recycling centres (RRCs) and a radius of two miles around them. Opportunities will be taken to ensure residents have good access to RRCs where there is an identified need (policy 5).

### **C. Encourage co-location of facilities**

- 4.14. The conglomeration of waste facilities in the Lee Valley corridor provides opportunities for co-location. The NPPW requires waste plans to identify opportunities to co-locate facilities together and with complementary activities, and this approach was supported by the focus group. There are several benefits of co-location. It has the potential to minimise environmental impacts, take advantage of 'economies of scale', share infrastructure, existing networks (e.g. the rail and highway network) and skilled workforces.
- 4.15. There are also co-location opportunities related to other industrial activities synergistic with waste management, for example the manufacturing of products from recycled materials. 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 strategy.

Figure 7: Current RRCs in North London



**D. Provide opportunities for decentralised heat and energy networks**

- 4.16. The concentration of existing and new sites in the Lee Valley corridor also creates good opportunities for developing connections to decentralised heat and energy networks. Co-location of waste facilities alongside potential consumers of the heat and power they produce is beneficial. The London Plan supports the development of combined heat and power systems and provision of heat and power to surrounding consumers. The Spatial Strategy Map above (Figure 6) shows where facilities could connect to a network ('decentralised heat opportunity area' and 'decentralised energy opportunity area'). The NLWP supports opportunities to develop combined heat and power networks on sites and areas within the Lee Valley that not only have the ability to link in to the decentralised energy network but also have the potential for waste development with CHP. All developments in these areas will be expected contribute to this in line with Policy 6.

**E. Reduce impact on local amenity**

- 4.17. The site selection criteria set out in Chapter 5 directs waste management development to the most suitable sites/areas taking into account environmental and physical constraints, including locations where any impacts that may occur can be mitigated to an acceptable level.
- 4.18. Policy 6 sets out assessment criteria for waste management facilities and related development which includes criteria for protecting local amenity. 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. Policy 6 also seeks the development of enclosed facilities to mitigate any negative impact associated with open air facilities on the surrounding environment and amenity.

**F. Support sustainable modes of transport**

- 4.19. As Figure 6 shows, North London is well served by road, rail and waterway networks and waste is currently transported in, out and around North London by both road and rail. There are potential opportunities for waste sites to better utilise sustainable modes of transport such as rail and waterways; however investment in wharfs and rail sidings may be required before waste can be moved along the canal or rail network. While sustainable transport methods are supported in line with Objective 7, it is recognised that related infrastructure is expensive to install and may not be economically viable for smaller facilities unless this already exists and can be easily used. North London currently has one rail linked waste site (at Hendon) supporting the

requirements of the North London Waste Authority (NLWA). This site is due to be redeveloped as part of the Brent Cross Cricklewood regeneration project. There are also opportunities for transportation by water at Edmonton EcoPark. Road transport will continue to be the principal method of transporting waste in North London. Access to transport networks including sustainable transport modes was considered when assessing the suitability of new sites and areas.

**G. Reduce exports of waste**

- 4.20. A final element of the spatial strategy relates to the areas outside the borders of North London. Waste is exported to a number of areas outside of North London, mainly in the south east and east of England. The NLWP seeks to reduce waste exports and increase the amount of waste managed in proximity to its source through 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. This is known as net self-sufficiency and the strategy for achieving this is set out in the Provision for North London's Waste to 2032 in section 7.

**Question 3: Do you agree with the draft spatial strategy for the NLWP? If not, please provide further detail and any alternative approaches.**

## 5. Current waste management in North London

- 5.1. This section looks at the current picture of waste management in North London, including the amount of waste generated; the current capacity, types and location of facilities; how each waste stream is managed and cross-boundary movements of waste.

### North London Waste Data Study

- 5.2. In order to assess North London's current facilities, capacity and arisings, and future waste management requirements, a Waste Data Study was published in 2014. This is available to view on NLWP website ([www.nlwp.net](http://www.nlwp.net)). The Waste Data Study is in three parts with an update to take account of new information and data:

- Part One: North London Waste Arisings
- Part Two: North London Waste Capacity
- Part Three: North London Sites Schedule
- Data Study Update

- 5.3. The Waste Data Study includes the following information:

- The amount of waste currently produced in North London;
- How and where North London's waste is managed;
- The capacity of existing waste infrastructure;
- The waste management targets the NLWP will support (for example recycling targets); and
- The amount of waste projected to be produced over the plan period (up to 2032) and the extent to which existing facilities can meet this future need

- 5.4. The Waste Data Study assessed all the main waste streams (set out in paragraph 1.4) which the NLWP will plan for and the findings are set out below.

- 5.5. The Waste Data Study was prepared using the best available and most recently published information for each waste stream. Other than for Local Authority Collected and Hazardous Waste, which is gathered and published consistently and on an annual basis, data for the other waste streams is widely acknowledged to be imperfect. The challenge of obtaining up to date and reliable waste data is highlighted in the National Planning Practice Guidance on waste. Part One of the Waste Data Study provides more detail on the sources of waste data used, its limitations and consistency.

**Waste generated in North London**

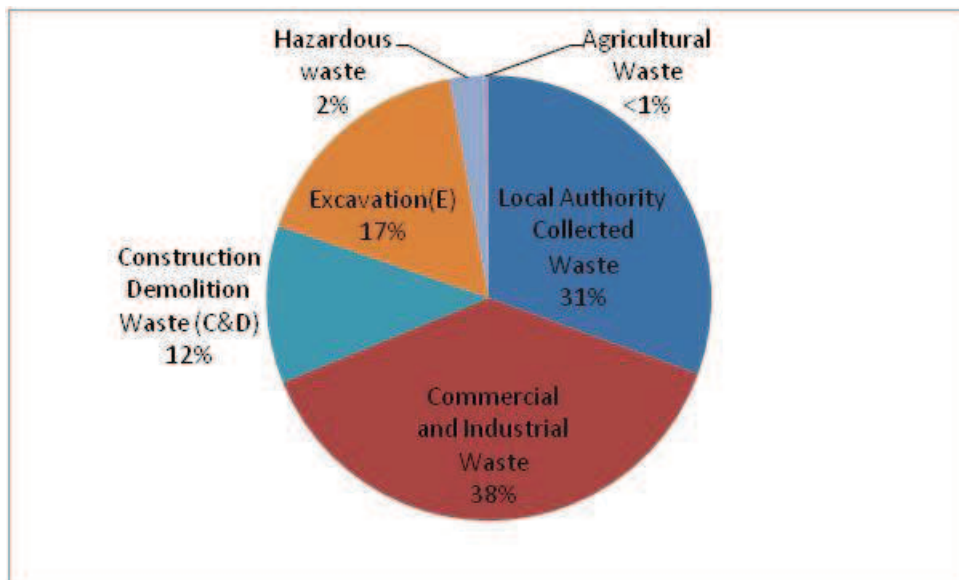
5.6. Table 2 below shows the amount of waste generated in North London for the main waste streams. Figure 8 shows the proportion of each waste stream as a percentage of the total waste in North London<sup>2</sup>.

**Table 2: Amount of Waste Generated in North London 2013**

Waste Stream	Tonnes Arising
Local Authority Collected (LACW including trade waste)	838,952
Commercial & Industrial (C&I excluding trade waste)	908,051
Construction and Demolition (C&D)	272,004
Excavation	401,072
Hazardous	58,216
Agricultural	9,223
<b>Total</b>	<b>2,373,330</b>

Source: North London Waste Data Study Update 2015

**Figure 8: Proportion of North London Waste in Each Waste Stream 2013**



Source: North London Waste Data Study Update 2015

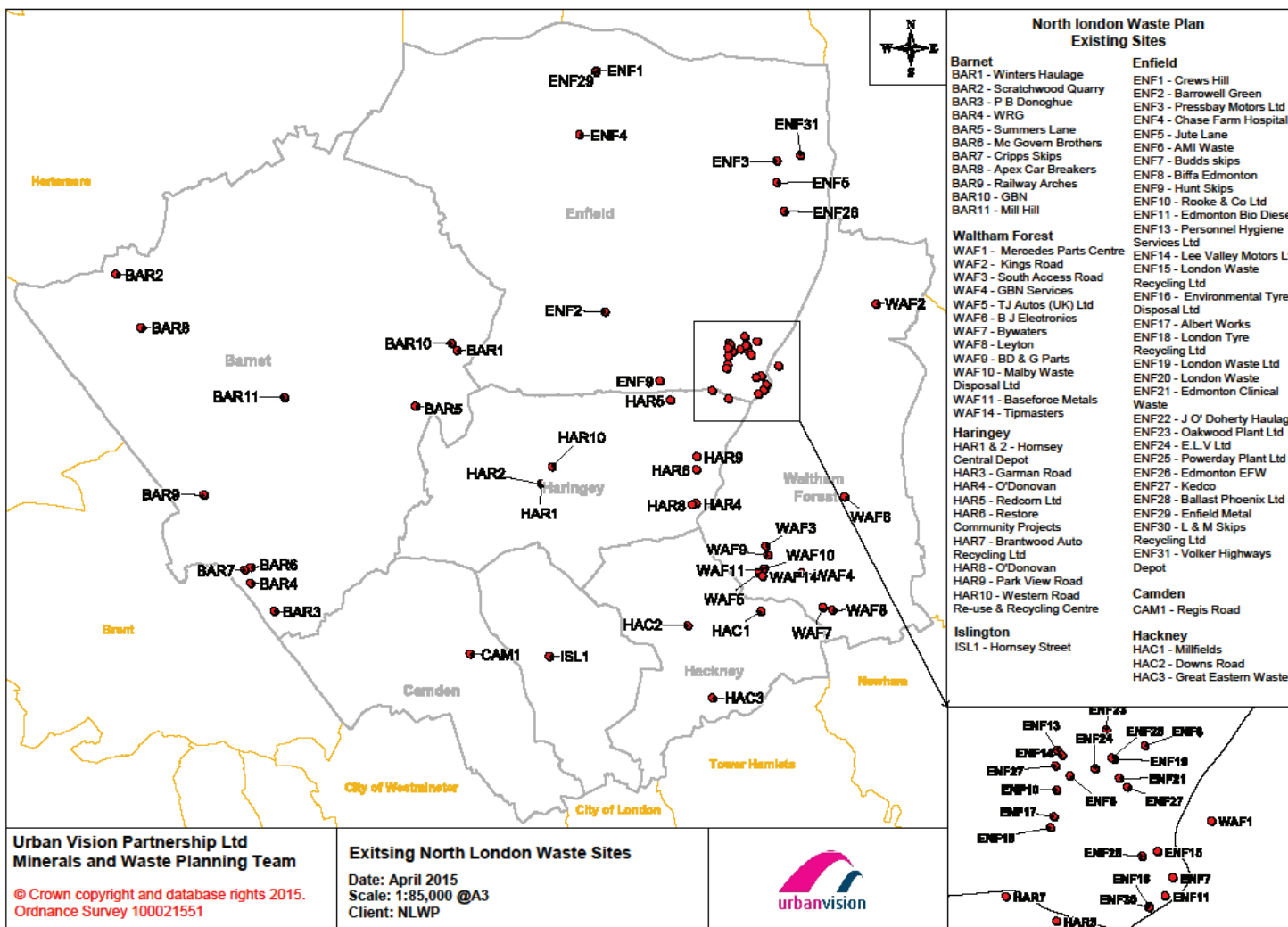
<sup>2</sup> The data is taken from the Waste Data Study Part Two, Table 1



### **Current facilities**

- 5.7. Table 3 below shows the existing waste management facilities in North London by type and waste stream managed, and takes account of the findings of the Waste Data Study Update. It identifies an existing waste management capacity of around 3.7 million tonnes per annum. Figure 9 shows the location of the facilities represented in Table 3 and a full list is in Appendix 1. North London has no landfill sites and waste is currently exported out of the plan area for this purpose.
  
- 5.8. On the face of it, current capacity of waste management facilities in North London appears to be more than enough to deal with the total waste generated in the area. However, this does not take into account the specialism of each type of facility, or imports to the area. This is examined in more detail in section 5.

Figure 9: Existing Waste Sites





5.9. The original Waste Data Study used the common assumption that sites categorised as Waste Transfer Stations did not carry out any recycling, and simply bulked up waste for transport to recycling and treatment facilities outside London. However, on further investigation it was found that a large amount of waste was being recycled at Waste Transfer Stations in North London and this is reflected in Table 3 below. As a result a number of sites, previously regarded solely as Waste Transfer Stations and not counted towards management capacity, have been re-categorised as Materials Recycling Facilities. A fuller explanation is provided in the Waste Data Study Update.

**Table 3: Maximum Annual Capacity at Existing North London Waste Management Facilities**

<b>Waste Stream</b>	<b>Facility Type</b>	<b>Maximum capacity (tonnes) (Base data 2013)</b>
LACW only	Transfer stations (non-hazardous)	827,971
LACW only	Re-use and Recycling Centres (RRCs)	90,020
LACW only	Material recycling facilities (MRF)	17,000
LACW only	Incineration with energy recovery (Energy from Waste: EfW)	550,000
LACW and C&I	Transfer stations (clinical waste)	203
LACW and C&I	Composting	33,427
C&I only	Material recycling facility (MRF)	357,257
C&I only	Recycling (Metals)	395,890
C&I only	Treatment facility	784
C&I and CDE	Transfer stations (non-hazardous)	124,866
C&I and CDE	Material recycling facilities (MRF)	632,002
C&I and CDE	Recycling (metals)	21,537
CDE only	Recycling (aggregates, other C&D)	216,177
CDE only	Treatment Facility	462,661
Hazardous	Treatment facility (Hazardous)	7,663
<b>TOTAL</b>		<b>3,737,460</b>

## Current Waste Management

### *Local Authority Collected Waste*

- 5.10. Preventing waste being generated in the first place is at the top of the waste hierarchy. Waste minimisation seeks to reduce the amount of waste produced by targeting particular behaviours and practices. Much of the regulatory impetus for waste minimisation in the UK comes from European regulations and is targeted towards LACW and C&I waste. There are a number of national schemes which promote waste minimisation. This includes the [‘Love Food Hate Waste’](#)<sup>3</sup> campaign which seeks to reduce food waste.
- 5.11. The Mayor supports the [London Reuse Network](#) which is made up of charities, social enterprises, and non-profit organisations who work together to promote re-use across London. The Mayor’s municipal waste strategy commits the Mayor to providing funding for waste authorities to carry out local waste minimisation campaigns. The London Infrastructure Plan 2050 embraces and seeks to accelerate a move towards better recycling and collection services.
- 5.12. The North London Boroughs run a number of waste minimisation activities for schools and communities. These are delivered through the North London Waste Authority’s (NLWA) [‘Wise up to Waste’](#) programme which focuses on reducing food waste (part of the ‘Love Food Hate Waste’ campaign) and junk mail, and encouraging home and community composting and use of real nappies. The Wise up to Waste team also facilitate reuse programmes ranging from clothes, shoes and furniture to carrier bags, and ‘Give and Take’ days where people can bring any household items that they no longer want or learn how to repair them.
- 5.13. Like waste minimisation, much of the impetus for recycling in the UK comes from European regulations. The EU Waste Framework Directive sets LACW recycling targets for member states and is enshrined in UK law.
- 5.14. Nearly 839,000 tonnes of LACW was collected in 2013/14<sup>4</sup>. Of this, approximately 32% was sent for recycling, reuse or composting. Of the remaining LACW, 45% was sent to NLWA’s energy-from-waste facility at Edmonton and 23% was sent to landfill outside of North London.

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<sup>3</sup> Managed by [WRAP](#)

<sup>4</sup> Figures from WasteDataFlow

- 5.15. The North London Waste Authority has reported an increase in recycling performance from 23% in 2006/7 to 32% by 2012/13. This is lower than the national average of 44% but higher than the London average of around 30%.
- 5.16. North London's recycling rate has slowed in recent years. There are a number of factors which contribute towards lower recycling rates in London. These include: rapid population growth; a greater transient population than anywhere else in the UK; the greater proportion of flats compared to houses which present challenges for setting up collection systems for recyclable waste; proportionately fewer gardens generating lower level of green waste for recycling, and; differences between Boroughs in terms of collection systems.
- 5.17. The North London Boroughs and the NLWA are all committed to achieving the 50% recycling target set out in the Joint Municipal Waste Management strategy and the London Plan. The North London Boroughs, together with the NLWA, are beginning a renewed drive to increase recycling including looking at ways to standardise collection regimes. Each of the North London Boroughs has their own recycling strategies in their capacity as waste collection authorities.
- 5.18. In addition the London Waste and Recycling Board (LWARB) work with London Boroughs to increase recycling rates and supports waste authorities in improving waste management services. LWARB also provides investment for new waste infrastructure, for example an anaerobic digestion plant north of Enfield which treats food waste from London, Hertfordshire and Essex to power homes and produce fertiliser for local farmers.
- 5.19. The planning application process also has a role to play in enabling recycling. Each North London Borough has planning policies or guidance to ensure procedures are in place to minimise waste generated during construction and that the building design includes measures to help residents recycle their waste, for example adequate storage for waste and recycling.
- 5.20. 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 and how it has informed the draft NLWP is set out in section 8 of this Plan.

#### *Commercial and Industrial Waste*

- 5.21. The Waste Data Study has used data from the Defra C&I Waste Survey 2009 to assess the management routes of North London's C&I waste. The 2009

survey indicates that 52% of C&I waste is recycled, reused or composted and 18% of this waste sent to landfill and land recovery. A small proportion (6%) of C&I is sent for thermal treatment or other forms of management (7%). However, it is not known how a further 17% of this waste stream is managed and potentially reliance on landfill could be as high as 34%.

- 5.22. The Mayor's Business Waste Strategy, "Making Business Sense of Waste" sets a target to recycle 70% of C&I waste by 2020. Businesses need to be encouraged and supported to recycle more. This includes having in place the waste management infrastructure to allow businesses to recycle and to reduce their reliance on landfilling. The London Waste and Recycling Board (LWARB) as discussed above works with businesses to increase their recycling rates.
- 5.23. 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. It is a voluntary agreement supported by leading retailers, brand owners, manufacturers and suppliers who sign up to the delivery of waste minimisation targets.
- 5.24. The Mayor's business waste strategy commits the Mayor to providing businesses with the help necessary to overcome barriers to waste minimisation. The North London Boroughs also run waste minimisation activities for businesses. The London Infrastructure Plan 2050 embraces and seeks to accelerate a move towards the circular economy in London.

#### *Construction, Demolition and Excavation Waste*

- 5.25. The majority of C&D waste is recycled on site or through transfer facilities (80%) with the remainder sent directly to landfill (16%) or treatment (3%). 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 (92%) with the remainder managed through transfer stations (6%) or sent for treatment (2%). The London Plan includes a target of 95% recycling of CD&E by 2020.

#### *Hazardous Waste*

- 5.26. For hazardous waste 53% (30,888 tonnes) was managed at treatment facilities in 2013, of which the majority (29,963 tonnes) was exported for treatment outside of North London. The next most common method of management was recovery (18%), with a further 13% being managed at landfill. The remaining amount was sent to transfer stations for later recovery

or disposal (14%) and to thermal treatment (2%). Of the total hazardous waste arisings, 57,053 tonnes (98%) 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*

- 5.27. The majority of agricultural waste arisings are managed within the farm holding, with a very small amount managed outside of farm holdings. 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 4 Unallocated sites.

#### *Low Level Non-Nuclear Radioactive Waste (LLW)*

- 5.28. The very small amount of Low Level Non-Nuclear Radioactive Waste (LLW) arising in North London, mainly from hospitals, is currently managed outside the area in specialist facilities. Records of LLW in the sub-region indicate that the amounts generated are below the reporting threshold, which is measured in terms of radioactivity. Volumes of waste are not requested from producers of LLW, however an estimate has been made that the annual arising of LLW in the sub-region is not likely to exceed 100m<sup>3</sup>.

#### *Waste Water and Sewage Sludge*

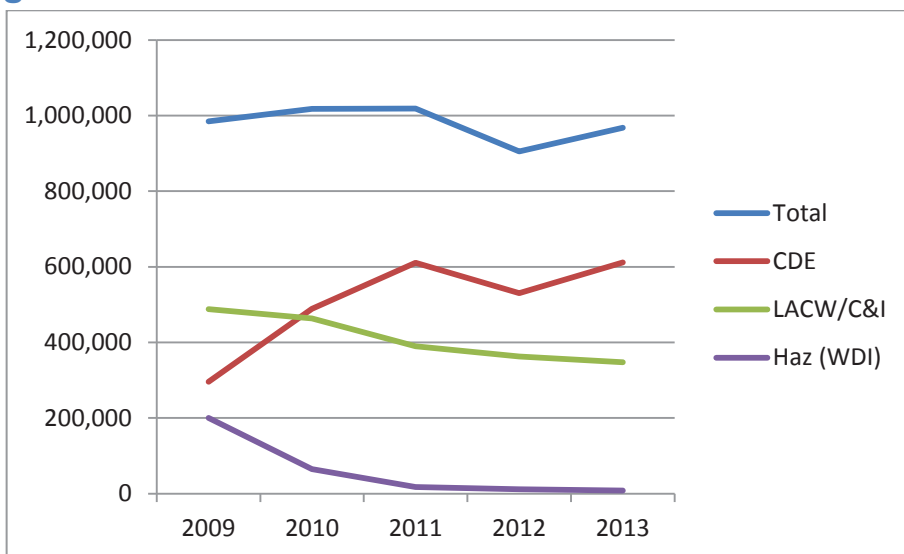
- 5.29. Waste Water Treatment Works in North London are operated by Thames Water. The main Thames Water Waste Water/sewage treatment facility in North London is Deephams Sewage Treatment Works (STW), which is the ninth largest in England. Deephams STW serves a Population Equivalent (PE) of 891,000 (as at 2011). The site is to be retained for waste water use and Thames Water anticipates that the recently approved upgrade to Deephams STW will provide sufficient effluent treatment capacity to meet their needs during the plan period. Thames Water is also proposing an upgrade to the sewage sludge treatment stream at Deephams STW. Further details can be found in section 8.

#### **Cross Boundary Movements**

- 5.30. On average, around 1 million tonnes of waste from all waste streams is exported from North London each year and over 70% of this goes to landfill. Exports in the LACW/C&I category have been steadily declining in recent years. This is in line with the waste strategies of the Mayor and the North London Waste Authority which aim to reduce the amount of waste going to landfill. Exports of CDE waste have been increasing at about the same rate

as LACW and C&I have been declining which results in a fairly consistent rate of export. This pattern is shown in the Figure 10 below.

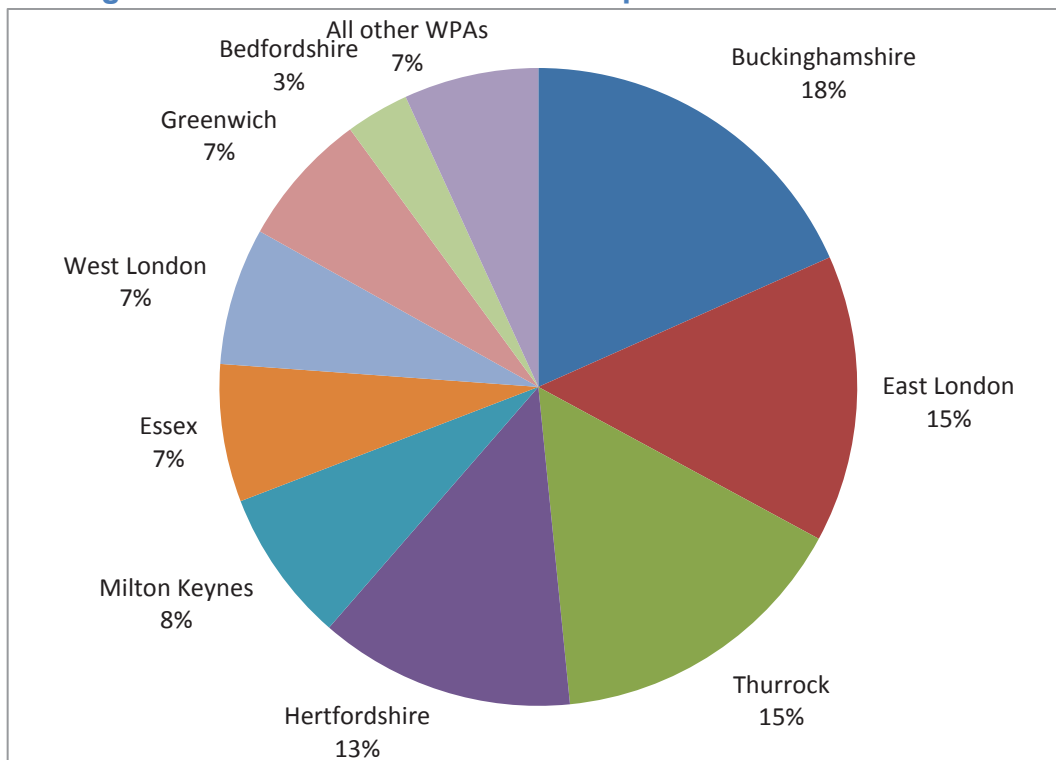
**Figure 10: Waste Generated in North London 2009-2013**



Source: WDI 2009-2013

5.31. Waste exports from North London are deposited in more than 100 different waste planning authority areas, but the majority (93%) goes to nine main destinations. These are shown in the Figure 11 below:

**Figure 11: Distributions of Waste Exports from North London**



Source: WDI 2010-2013

- 5.32. On average 1.2 million tonnes of waste is imported to North London. Most of this comes from our immediate neighbours in Greater London, the South East and East of England and is managed in transfer stations, treatment facilities and metal recycling sites. On the face of it, North London is a net importer of waste; however this does not take account of the unknown quantity of waste which passes through the area to be managed elsewhere.
- 5.33. 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. While the main focus has been on the nine WPAs shown above, the North London Boroughs are also continuing a dialogue on waste movements with all WPAs who wish to do so. A Report on the duty to co-operate, issues identified and next stages accompanies this Plan and is summarised here.
- 5.34. Engagement to date has highlighted a number of constraints to the continuation of waste exports to landfill from North London. These include the potential closure of landfill sites during the plan period in Bedfordshire, East London, Essex, Hertfordshire and Thurrock. The operation of some of these sites may be extended beyond their currently permitted end date and the boroughs will continue to monitor this information throughout the preparation of the NLWP. The next iteration of the Plan ("submission version") will need to demonstrate there is sufficient capacity outside North London to accommodate the waste anticipated for export to landfill (set out in Figure 12). Should a site be anticipated to close during the plan period, the NLWP will seek to identify potential alternative destinations and/or management routes for the amount of waste currently being exported to that site. The North London Boroughs will pursue agreement on this matter with recipient waste planning authorities through a memorandum of understanding in line with the Duty to Co-operate Protocol.
- 5.35. A further constraint to the continued movements of waste comes in the form of waste plan policies in those areas receiving London's waste. These policies provide for a declining amount of landfill space for London's LACW and C&I waste down to zero by 2026. The abolition of the RSS means that the apportionments will not be refreshed or updated beyond their current timeframe and the waste planning authorities in question do not expect to receive much LACW and C&I waste after 2026.
- 5.36. The NLWA intends to minimise the amount of LACW sent direct to landfill by 2025 by maximising recycling and maintaining the throughput of the existing Energy from Waste facility at Edmonton EcoPark. The North London Waste Plan will also support this strategy by identifying sufficient land to meet



capacity for the equivalent of all LACW and C&I generated in North London by 2026. Further information on how waste will be diverted from landfill can be found in the Provision for North London's Waste to 2032 in section 7.

- 5.37. A final issue related to the continued export of waste has been identified for hazardous waste. This type of waste is managed in specialist facilities which have wide catchment areas and may not be local to the source of the waste. North London has two hazardous waste facilities which manage a small amount of this waste (around 7,600 tonnes per annum) while the rest (87%) is exported. While the export of most hazardous waste to the most appropriate specialist facilities is likely to continue, current data collection methods do not make it easy to identify which hazardous waste facility is managing waste sent from North London. The boroughs will work with the Environment Agency and waste planning authorities who receive hazardous waste from North London to identify which facility manages North London's waste and any constraints to the continued export of this waste. Additionally, the boroughs will seek to identify potential new destinations for the management of North London's hazardous waste if any constraints to the continued movements of this waste are identified, for example closure of the facility. The North London Boroughs will pursue agreement on this matter with recipient waste planning authorities through a memorandum of understanding in line with the Duty to Co-operate Protocol.
- 5.38. The North London Boroughs will continue to co-operate with relevant authorities on matters of strategic waste planning throughout the preparation of the NLWPNorth London. The framework for this is set out in the Duty to Co-operate Protocol which was subject to consultation and is available [online](#). An important part of co-operation with WPAs who receive North London's waste is the consultation on this Draft Plan and in particular the 'Provision for North London's Waste to 2032' (section 7) which sets out in broad terms how the waste management needs in North London over the plan period will be met; and Figure 12 which shows anticipated waste exports to landfill over the plan period. We are inviting comments on this approach from WPAs who receive waste from North London.



## **6. Future Waste Management Requirements**

### **Context**

- 6.1. In line with the requirement of the National Planning Policy for Waste (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.
- 6.2. 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.
- 6.3. A Waste Data Study and an update to the Waste Data Study have been prepared to accompany this Draft Plan. The Data Study concluded that over the NLWP plan period there are capacity gaps for LACW, C&I and CD&E waste, and that North London will require additional facilities to meet these. There is also a capacity gap for hazardous waste and the North London Boroughs will contribute to the planning for hazardous waste facilities at a regional level. 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. More information about how each waste stream will be managed can be found in the Provision for North London's Waste to 2032 (section 7).

### **Options for managing North London's waste**

- 6.4. In line with the National Planning Policy Framework (paragraph 182) to ensure the NLWP is justified, a range of options have been tested to demonstrate that the North London Boroughs have considered reasonable alternatives and that the Plan follows the most appropriate strategy. An Options Appraisal Report (December 2014) was prepared which considered 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). The findings of the Options Appraisal have been taken forward as 'preferred options' in this Draft Plan.
- 6.5. This section summarises these options, sets out the preferred approach, identifies the capacity gaps and shows how much land will be required to meet the gaps. The outcome of this is the 'Provision for North London's Waste to 2032' in Chapter 7 which sets out the strategy for each waste stream over the plan period.

**Growth assumptions: How much waste will be generated in North London up to 2032?**

- 6.6. The Data Study 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, as well as those set nationally.
- 6.7. The three growth scenarios represent different population and economic factors that will affect the quantity of waste generated from households, businesses and services. The growth assumption options are:
- Option A: No Growth
  - Option B: Growth
  - Option C: Minimised growth
- 6.8. All the evidence and projections anticipate substantial population and economic growth in London over the next few decades. The Options Appraisal report concludes that Growth Assumption Option B: Growth is the most appropriate strategy for the Draft NLWP as it will provide the most accurate modelling scenario to project future capacity gaps.
- 6.9. Option B: Growth is closely aligned with the Greater London Authority's (GLA) modelling which has been independently tested through the London Plan Examination process. This provides a helpful alignment between the GLA's growth model and the findings of NLWP's waste data study model. In addition, Option B reduces the risk of under-provision of capacity for waste needs in North London over the next fifteen years.
- 6.10. Growth Options A and C are not considered to be appropriate strategies as they do not represent the most credible estimate of growth in North London over the plan period.

**Capacity Options: how much of North London's waste can be managed within North London?**

- 6.11. The NLWP is required to meet apportionment targets for Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste set out in the London Plan. The NLWP has to go beyond this and plan for all the main waste streams, in accordance with EU and national policy. As mentioned in section 4, Low Level Radioactive Waste and agricultural waste arisings do not need additional facilities during the plan period. Thames

Water anticipates that the upgrade to its existing Deephams facility will be sufficient to manage wastewater effluent during the plan period. It is anticipated that further upgrades to sewage sludge treatment or other treatments can be contained within the Deephams site. This leaves local authority collected waste (LACW), commercial and industrial (C&I) and construction, demolition and excavation (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.

6.12. The following capacity strategy options were considered:

- Option 1: Meeting the London Plan apportionment (managing approximately 85% of LACW and C&I waste generated in North London)
- Option 2: Net self-sufficiency for LACW and C&I waste streams (managing the equivalent of 100% of LACW and C&I waste generated in North London)
- Option 3: Net self-sufficiency for LACW, C&I and C&D waste streams (managing the equivalent of 100% of LACW, C&I and C&D waste generated in North London)
- Option 4: Complete self-sufficiency (managing every tonne of locally created waste within North London)

6.13. Option 3: Net self-sufficiency for LACW, C&I and C&D waste is considered the most appropriate capacity strategy for the Draft NLWP. 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. Option 3 is the only potentially deliverable option which is compliant with European Union and 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.

6.14. There are still risks associated with Option 3. Land requirements to meet net self-sufficiency for LACW, C&I and C&D waste streams is higher than the other options and the NLWP will need to demonstrate that the sites/areas required can be delivered. In addition, despite reducing the amount of waste which is exported, some waste will still require management outside the area and the Boroughs need to ensure that there are no constraints to this continuing. See Figure 12 for anticipated exports to landfill during the NLWP plan period.

6.15. Options 1 and 2 are not considered appropriate strategies as the NLWP would not be in compliance with European Union and national policy on planning for all main waste streams. In addition, Options 1 and 2 would rely more heavily

on facilities outside the area and neighbouring authorities have highlighted a need for London boroughs to reduce exports and for the NLWP to plan to meet as much of its waste as possible. Option 4 could only be achieved if the North London boroughs can provide capacity to manage every tonne of locally created waste within North London. This option was rejected as it would require more capacity, including landfill and specialist facilities, than could be realistically delivered in North London.

### Management Options: how waste will be managed within North London

6.16. 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. These targets are as follows:

**Table 4: Recycling and Recovery Targets with 2014 Baseline**

Waste stream	Target	2014 baseline
LACW	50% recycling for LACW by 2020 with 40% energy recovery from 2015	32%
C&I	70% recycling by 2020, 75% recycling by 2031 with 15% energy recovery from 2020	52%
C&D	95% recycling by 2020	80%
Biodegradable or recyclable waste	Zero biodegradable or recyclable waste to landfill by 2026)	Not known

6.17. Three recycling/recovery options were considered which represent different behaviours that will affect the quantity of recycling and recovery possible from the waste arisings. These are:

- Option I: Baseline (current levels of recycling/recovery)
- Option II: Maximised Recycling
- Option III: Maximised Recovery/median recycling

6.18. Option II: Maximised Recycling is the most appropriate choice of behaviour scenario as it aligns with European Union, national, regional and local targets. Option II also means that more waste will be managed further up the waste hierarchy than the other options with more opportunity to divert waste away from landfill.

6.19. There are risks associated with Option II. Land requirement is higher than the other options and the NLWP will need to demonstrate that the sites/areas required can be delivered within North London. In addition, increasing recycling in North London in the timeframes set out will be challenging.

- 6.20. Behaviour Option III could deliver net self-sufficiency through prioritising recovery over recycling, but it was discounted as it would not meet the Mayor's timescales for recycling and, along with Option I, would not be in line with European Union, national, regional and local targets on recycling within the 2020 timeframe. In addition, Options I and III would not help reduce waste going to landfill and manage waste higher up the waste hierarchy to the same extent as Option II.
- 6.21. The most appropriate strategy and therefore the Preferred Option for the Draft NLWP is a combination of Option B: Growth, Option II: Maximised Recycling to meet Option 3: Net self-sufficiency for LACW, C&I and C&D waste streams.

<p><b>Preferred Options for planning for North London's waste</b></p> <p>Population/Economic Growth (Option B)</p> <p>+ Max Recycling (Option II)</p> <p>+ Net self-sufficiency (Option 3)</p> <p>=</p> <p>Quantity of waste to be managed</p>
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- 6.22. It is considered that this combination, along with existing capacity, will provide the most robust modelling scenario to project future capacity gaps and waste management needs.

**Question 4: Do you agree with the NLWP taking forward the Preferred Options of Option B: Growth, Option II: Maximised Recycling to meet Option 3: Net self-sufficiency for LACW, C&I and C&D waste streams? If not, please state why and suggest an alternative Option.**

**Meeting the Capacity Gap**

- 6.23. Table 5 below sets out the capacity gap using the preferred options of Option B: Growth, Option II: Maximised Recycling to meet Option 3: Net self-sufficiency for LACW, C&I and C&D waste streams. This is broken down in to 5 year periods to show points in time when a capacity gap is identified. Negative figures indicate a a capacity gap and therefore the type of management route for which capacity is sought over the plan period.

Table 5: Capacity gaps throughout the Plan period – preferred scenario

Management Route	2016	2021	2026	2031
Landfill (C+I and LACW)	-326	-132	-115	-101
Landfill (Hazardous)	-7	-7	-7	-7
Landfill (C+D)	-44	-14	-15	-15
Landfill (E)	-370	-383	-395	-406
Energy from waste (LACW) <sup>5</sup>	94	135	279	273
Energy from waste (C&I)	-40	-94	-99	-105
Energy from waste (Hazardous)	-0.3	-0.3	-0.3	-0.3
Thermal Treatment (Hazardous - no energy recovery)	-0.8	-0.8	-0.8	-0.8
Recycling (C+I and LACW)	584	193	26	-14
Recycling (C+D)	-84	-127	-138	-147
Recycling (specialist material)	401	400	400	399
Recycling (Hazardous)	-15	-15	-15	-15
Reuse (E)	-41	-43	-44	-45
Composting	21	21	20	20

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<sup>5</sup> Assumes the redevelopment of Edmonton EcoPark in line with the proposed NLWA Development Consent Order.

Management Route	2016	2021	2026	2031
Treatment plant (non-hazardous)	445	64	64	63
Treatment plant (hazardous)	-27	-27	-27	-27

Source: NLWP data study model (all figures in 000 tonnes rounded)

6.24. In order to meet the preferred option of net self-sufficiency for LACW, C&I and C&D waste streams, sufficient land will be identified through site allocations and identified areas to provide for this need. Table 6 below sets out the amount of land required within North London to meet the capacity gaps identified in Table 5. It does not include capacity such as landfill, re-use of excavation waste and hazardous waste facilities for which there will be continued use of facilities located outside the area. The Data Study Update sets out the methodology used to translate the capacity gap into land required to meet waste management requirements over the plan period. In summary, evidence was gathered and evaluated to identify typical capacity and land take for each type of facility. This data was used to estimate the land take that would be required to meet the capacity gaps in Table 5. The results of this work is shown in Table 6.

**Table 6: Land take requirements for meeting net self-sufficiency for LACW, C&I and C&D (requirements for London Plan apportionment in brackets)**

Facility Type	Hectares				
	2016	2021	2026	2031	Total
Energy from waste (C&I)	4 <sup>6</sup> (4)				4 (4)
Recycling (LACW and C&I)			2 (2)		2 (2)
Recycling (C&D)	4	2			6
<b>TOTAL land required in North London</b>	<b>8 (4)</b>	<b>2 (0)</b>	<b>2 (2)</b>	<b>0 (0)</b>	<b>12 (6)</b>

<sup>6</sup> The existing Energy from Waste (EfW) facility at Edmonton does not currently accept C&I waste from private operators. Should a change in practice occur, this land may not be required.



## 7. Provision for North London's Waste to 2032

- 7.1. The information about existing capacity and facilities and the choice of the preferred options outlined in Chapter 5 establishes the capacity gaps for each of the seven waste streams, and how much land will be required to meet these gaps. Using this information, the North London Boroughs propose to adopt the following approach ('Provision for North London's Waste to 2032'); this sets out in broad terms how the waste management needs in North London over the plan period will be met. While some waste will continue to be exported to facilities which North London cannot accommodate, there is a surplus of provision for some management routes (shown as minus figures in Table 5) and therefore an equivalent quantity of waste can be provided within North London.

### Provision for North London's Waste to 2032

The preferred approach to future waste management in North London is to manage the equivalent of all Local Authority Collected Waste, Commercial and Industrial and Construction and Demolition waste generated in North London, while recognising that some imports and exports will continue (net self-sufficiency).

The waste management needs in North London to 2032 will be met as follows:

#### **Local Authority Collected Waste (LACW) and Commercial and Industrial Waste (C&I)**

Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste streams comprise similar types of waste. The NLWP will identify sufficient sites to manage the equivalent of all LACW and C&I waste arising in North London in order to divert these waste streams away from landfill by 2026.

#### **Recycling**

The NLWA are seeking to achieve a household waste recycling target of 50% by 2020 which is in line with the targets included within the North London Joint Waste Strategy. The Authority and partner borough will continue to seek to maximise recycling levels for LACW. At present there is substantial spare recycling capacity for handling both these waste streams but this will be increasingly exhausted as recycling rates rise to meet performance levels needed to deliver targets. As a result, a requirement for an additional 14,000 tonnes of capacity, with an anticipated land take of 2ha, will develop late in the Plan period and this requirement is identified in Table 6.

#### **Energy from Waste**



Most LACW is managed at the Edmonton EcoPark facility which has a capacity of around 550,000tpa. It is intended that the existing Edmonton facility will be modified to enable connection to a heat network. The facility does not currently accept C&I waste from private operators.

The existing Edmonton facility will be subject to upgrade work to enable connection to a heat network. The North London Waste Authority (NLWA) is pursuing a Development Consent Order (DCO) for a new Energy Recovery Facility (ERF) sized to deal with all the residual waste under the control of the Authority from 2025 until at least 2050. The planning framework for this site includes the Edmonton EcoPark Supplementary Planning Document and emerging Central Leaside Area Action Plan.

There is a capacity gap for Energy from Waste development to manage Commercial and Industrial (C&I) wastes. As the existing EfW facility at Edmonton does not currently co-treat both waste streams in the same facility, 4 ha of land is required to facilitate this provision. This is identified in Table 6.

#### *Transfer*

NLWA manage two waste transfer stations in North London namely the Hendon Rail Transfer Station (Barnet) and the Hornsey Street Road Transfer Station (Islington). Any future development associated with these facilities will need to demonstrate and ensure transfer of material to treatment facilities adequately serves the requirements of both the Authority and the boroughs.

#### Landfill

North London has no landfill sites and currently 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.

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.

See Figure 12 for the anticipated decline in landfilling of North London's waste over the plan period.

#### **Construction, demolition and excavation waste (CD&E)**

The NLWP will identify sufficient sites to manage the equivalent of all Construction and Demolition (C&D) waste arising in North London in order to divert this waste away from landfill during the plan period, while acknowledging that some exports will

continue, particularly for Excavation waste.

### Recycling

The majority of C&D waste is recycled on site or through transfer facilities. North London has a number of transfer facilities which recycle C&D waste but a large quantity is still exported to landfill. Recycling opportunities are likely to be mainly for C&D wastes as excavation waste is typically disposed of directly to landfill. In order to divert C&D waste away from landfill, the Data Study has identified a capacity gap for 84,000 tonnes per annum of C&D waste by 2016, rising to around 147,000 tonnes by 2031. Provision will be needed at the commencement of the Plan and additional capacity is needed by 2021. Six hectares of land will be required to facilitate this provision and this is identified in Table 6. Opportunities to re-use CD&E waste locally will be supported, though this cannot be predicted with any certainty.

### Landfill

North London has no landfill sites and currently depends on capacity outside the plan area. It is anticipated that C&D waste exports to landfill will reduce over the plan period.

Some of the CD&E waste stream, particularly excavation waste, will continue to be exported to landfill unless opportunities materialise to re-use it locally. The North London Boroughs will work with waste planning authorities who receive CD&E waste from North London to identify constraints to the continued export of this waste and identify potential new destinations where appropriate.

See Figure 12 for the anticipated decline in landfilling of North London's waste over the plan period.

### Hazardous Waste

All the waste streams include some hazardous waste. Hazardous waste is managed in specialist facilities which have wide catchment areas and may not be local to the source of the waste. Planning for hazardous waste facilities is a strategic issue (regionally and arguably nationally rather than sub-regional) and it is not anticipated that facilities would be identified to meet the requirements of North London alone.

North London has two hazardous waste treatment facilities with a small combined capacity of around 7,600 tonnes per annum. There is a capacity gap across all management options for hazardous waste. Hazardous waste is likely to continue to be exported to the most appropriate specialist facilities. The North London Boroughs will 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.

The North London Boroughs will continue to work with the Greater London Authority and surrounding WPAs in the management of hazardous waste. The proformas in Appendix 2 identify which sites and areas are not suitable for hazardous waste facilities. Any application for a hazardous waste facility in North London will be considered on a case by case basis.

### **Agricultural Waste**

The small amount of agricultural waste generated in North London is not expected to increase over the plan period and there is no requirement for plan for additional facilities to manage this waste stream.

### **Low Level Radioactive Waste (LLW)**

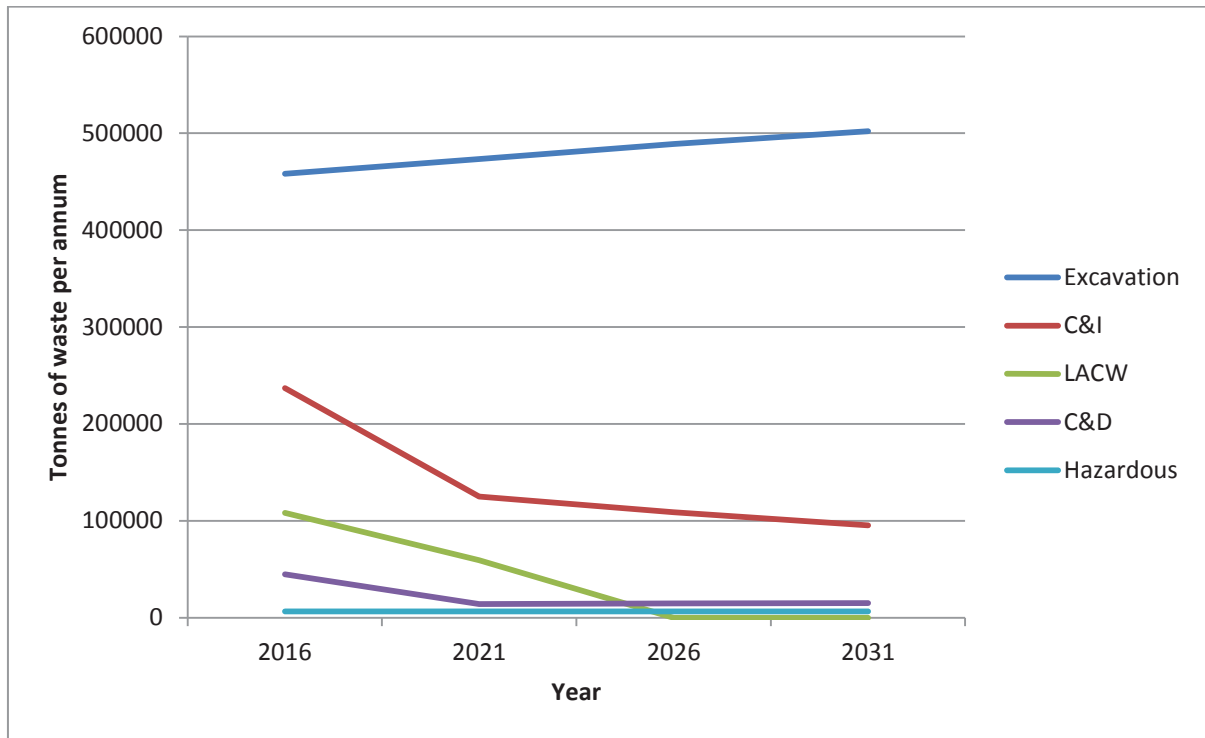
The very small amount of Low Level Non-Nuclear Radioactive Waste (LLW) arising in North London will continue to be managed outside the area in specialist facilities. It is therefore not necessary to plan for additional facilities in North London for this waste stream.

### **Waste Water**

The main Thames Water sewage treatment facility in North London is Deephams Sewage Treatment Works (STW), operated by Thames Water. Planning permission for an upgrade to this site has been secured and Thames Water anticipates this will provide sufficient effluent treatment capacity to meet their needs during the plan period. Thames Water is also proposing an upgrade to the sewage sludge treatment stream at the site which will be sufficient to meet their needs during the plan period. It is therefore not necessary to identify additional land for this waste stream in the NLWP.

7.2. Figure 12 below shows the anticipated decline of waste to landfill over the plan period, as set out in the 'Provision for North London's Waste to 2032'.

Figure 12: Anticipated exports to landfill during the NLWP plan period



Source: NLWP Data Study (2014)

## 8. Sites and Areas

### Context

- 8.1. The Waste Data Study has identified capacity gaps for waste management in North London up to 2032 and calculated the amount of land needed to meet these gaps. The methodology takes into account any known expansion to existing capacity or loss of existing facilities.
- 8.2. This section sets out the approach to identifying sufficient land for future waste management facilities in North London to ensure the delivery of the identified capacity requirements in Chapter 4. Sections 3-6 of the National Planning Policy for Waste (NPPW) sets 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. Assessment criteria have been developed using waste planning policy and in consultation with key stakeholders.
- 8.3. The NLWP identifies both sites and areas to meet future waste needs and these have equal status in the delivery of the NLWP. A 'site' is an individual plot of land that will be safeguarded for waste use, whereas an 'area' comprises 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 a number of reasons for following this approach. The (NPPW) endorses 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"
- 8.4. Allocating both sites and areas to meet the identified capacity gaps offers considerable benefits. Allocating sites that are available and suitable for waste management facilities will demonstrate that the North London Boroughs can meet the apportionment targets set out in the London Plan – boroughs are required to meet apportionment targets as a minimum. However, care needs to be taken when allocating sites to ensure there are no immitigable constraints to future development for waste management facilities.
- 8.5. Identifying areas within which waste uses would be broadly acceptable will ensure the NLWP has sufficient flexibility to cope with any future change in circumstances. In addition, developers seek flexibility in terms of location of waste facilities, particularly where considerable competition for land is a factor. Identification of a portfolio of sites and areas suitable for waste is considered an appropriate approach to meeting the needs of the industry and

was generally supported by key stakeholders in the NLWP focus group sessions held in 2014. A similar approach of identifying both sites and areas has been taken, deemed sound at examination and adopted by a number of other waste plans, including in London.

### **Expansion of existing Waste Management Facilities**

- 8.6. Existing waste management facilities are also a key part of future provision. A 'call for sites' exercise in 2014 targeted existing waste operators in North London seeking information on any planned capacity expansion or upgrades to existing facilities. Three sites were put forward: Edmonton EcoPark, Deephams Sewage Treatment Works and Powerday in Enfield. Any other proposals for upgrades to existing sites which are submitted during the plan preparation period will be included in subsequent iterations of the NLWP. Any applications for expansion or consolidation of existing waste management sites will be considered against NLWP policies and those of the Borough Local Plan in which the proposal is situated.

#### *Edmonton EcoPark*

- 8.7. In November 2014 the North London Waste Authority 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 has served North London and beyond for around 45 years but is coming to the end of its operational life. A Development Consent Order (DCO) is currently being sought for the new ERF and it is anticipated that this site will manage the treatment of the residual element of LACW during the NLWP plan period and beyond. The replacement facility, expected to be operational from 2025, could 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. Once the new facility has been developed, the existing EfW facility would be demolished and the associated parcel of land will continue to be safeguarded for future waste use, and would be available towards the end of the plan period. The development of Edmonton EcoPark for the new Energy Recovery Facility will provide a strategic facility for the NLWP and provide a solution for managing the non-recyclable element of LACW. Delivery of this facility would 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 the 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.

*Deephams Sewage Treatment Works*

- 8.8. The Environment Agency has issued a significantly tighter environmental permit that comes into force in March 2017 and requires Thames Water to make improvements to the quality of the discharged effluent. The need for an effluent upgrade to Deephams Sewage Treatment Works (STW) is highlighted in the National Planning Statement on Waste Water, and planning permission for this work was granted by Enfield Council on 20<sup>th</sup> February 2015. Thames Water is also proposing an upgrade to the sewage sludge treatment stream at Deephams STW during its 2015 to 2020 business plan period by providing enhanced sludge treatment plant within the boundaries of the existing site. Enfield Council will continue work with Thames Water and the Environment Agency to ensure that adequate and appropriate waste water treatment infrastructure is provided.

*Powerday*

- 8.9. Powerday in Enfield is an existing site currently operating as a Waste Transfer Station. Planning permission has been granted for an upgrade to a Materials Recovery Facility (MRF) capable of handling 300,000 tonnes of waste per annum which is expected to comprise C&I and C&D waste. Completion is due in April 2015.

**Loss of existing waste management facilities**

- 8.10. The North London Boroughs are aware that the regeneration of Brent Cross Cricklewood redevelopment and the construction of CrossRail 2 are likely to affect some existing waste sites. Should these sites or any others from new developments that may transpire need to be relocated, compensatory capacity within London is required in order to comply with the London Plan. It is known that some capacity will be lost during the plan period and replaced outside North London with a net loss to North London but not to London as a whole. Where such issues are known and new sites have already been sought, this information has been fed in to the Plan process.

**Site and Area Search Criteria**

- 8.11. The proposed site and area search criteria used in the NLWP site selection process were developed based on the requirements of national waste planning policy (National Planning Policy Statement 10 and its replacement the National Planning Policy for Waste). Both planning and spatial criteria was discussed with key stakeholders through a focus group in spring 2014 and further refined with consideration to the feedback received. Following the introduction of the National Planning Policy for Waste in October 2014, the site search criteria were reviewed to ensure compliance with this document.



### Site and Area Search and Selection Process

- 8.12. An extensive site and area search and selection process has been undertaken. Full details of the site selection exercise are set out in the evidence base document, Sites and Areas Report. 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 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 sites and areas were included in the process in order that the site assessment process for the NLWP could then be applied; unsuitable sites and areas were then screened out using desk based assessment described below, before applying the agreed assessment criteria to the remaining sites/areas.
  - iv. Desk based site and area assessment - To help refine the list of sites and areas, the assessment criteria were applied. These relate to factors that may constrain waste use on particular sites/areas, therefore ruling them out from further consideration. The assessment criteria were split into two levels, absolute criteria and screening criteria. Both are shown in Table 7 below. The absolute criteria were applied first where the identified constraint forms part of the proposed site. 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.
  - v. Site visits were undertaken in August and October 2014 to check and refine information from the desk based assessment and to assess potential facility types on the sites as well as a more

detailed assessment to determine whether the site/area was considered to have potential for future waste development.

- vi. An assessment on the ability of identified areas to accommodate waste facilities was undertaken. 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 against declining industries such as manufacturing. Secondly, a review of the vacancy rates for industrial land for each of the Boroughs was used to estimate the proportion of sites within these areas which are likely to become available over the plan period. The vacancy rates were applied to the areas resulting in an estimated 10% of the total becoming available over the plan period. Further information is available in the Sites and Areas Report.
- vii. Sustainability Appraisal<sup>7</sup> and Habitats Regulation Assessment<sup>8</sup> of sites/areas – all proposed sites 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 ask for their comments regarding 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 lying within a level 2 or 3 flood risk zone have been subject to sequential test 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.

8.13. The assessment criteria applied to all sites and areas is listed in Table 7 below. The criteria have been used in assessing sites and areas during both the desk based assessment and site visits.

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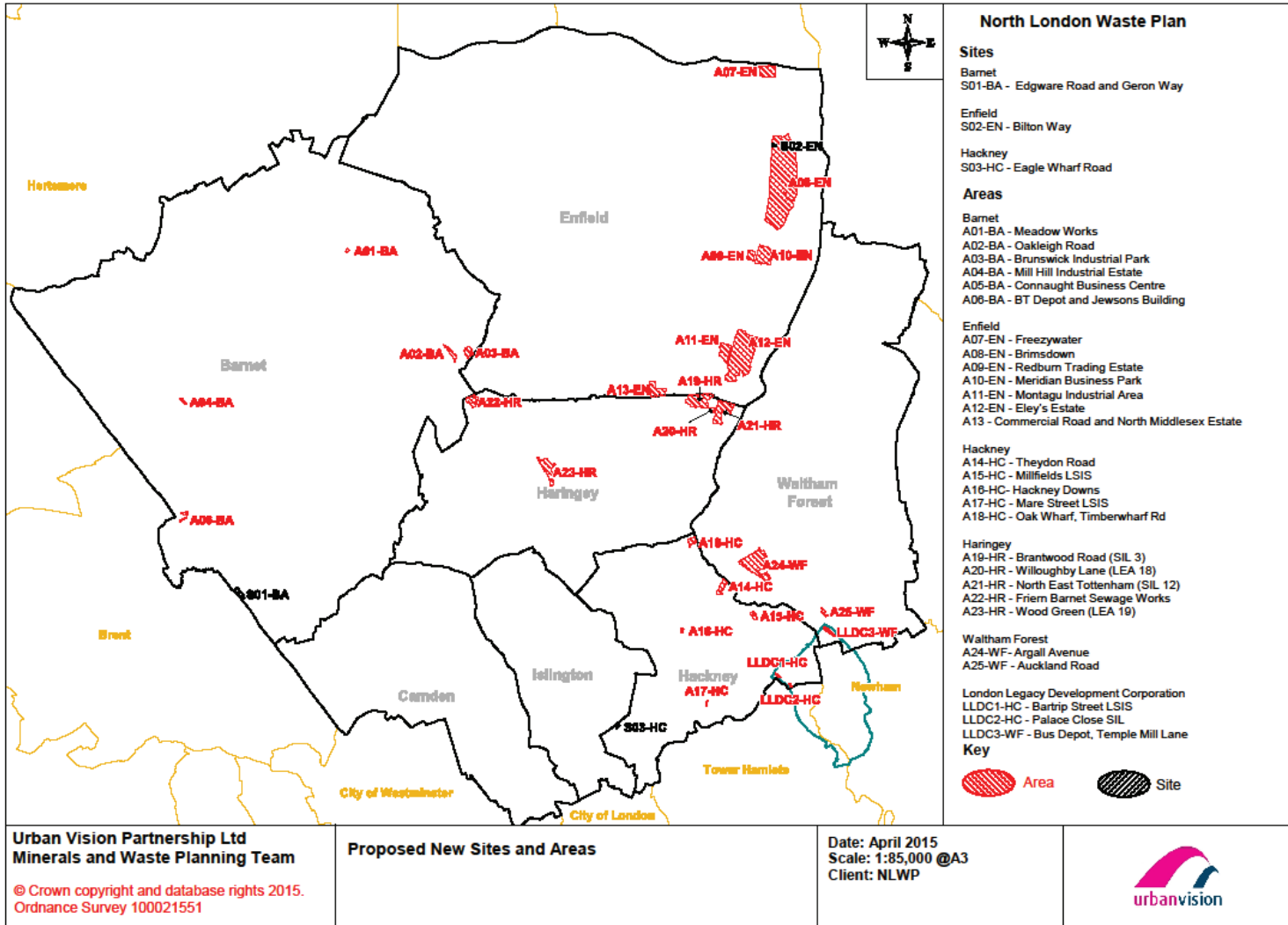
<sup>7</sup> Sustainability appraisal is the assessment of the potential impact against an agreed set of social, environmental and economic objectives. It encompasses the requirement of Strategic Environmental Assessment which is a requirement of Europe that all plans undergo.

<sup>8</sup> HRA is a requirement of Europe that all plans are assessed against their potential impact of natura 2000 sites.

Table 7: Sites and Areas Assessment Criteria

Absolute Criteria	Screening Criteria
<ul style="list-style-type: none"> <li>• Metropolitan Open Land (MOL)</li> <li>• Green Belt (for built facilities)</li> <li>• Grade 1 &amp; 2 agricultural land (part of the Green belt)</li> <li>• Sites of international importance for conservation e.g. Ramsar sites, Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)</li> <li>• Sites of national importance for conservation e.g. Sites of Special Scientific Interest and National Nature Reserves</li> <li>• Ancient Woodlands</li> <li>• Scheduled Ancient Monuments</li> <li>• Listed Buildings (grade I and II*)</li> <li>• Registered Parks and Gardens (grade I and II*)</li> <li>• Registered battle fields</li> <li>• Areas of Outstanding Natural Beauty (AONB)</li> <li>• Protected open spaces</li> <li>• Landscape designations such as Areas of Special Character (part of the Green Belt)</li> </ul>	<ul style="list-style-type: none"> <li>• Sites of local importance for nature conservation (SINCs)</li> <li>• Flood risk areas/flood plain</li> <li>• Accessibility (proximity to road, rail, canal/river)</li> <li>• Sites greater than 2km from the primary route network</li> <li>• Ground water protection zones</li> <li>• Surface waters</li> <li>• Major aquifers</li> <li>• Airfield safeguarding areas (Birdstrike zones)</li> <li>• Air Quality Management Areas</li> <li>• Unstable land</li> <li>• Green belt (for non-built facilities)</li> <li>• Local Plan designations</li> <li>• Settings of Scheduled Ancient Monuments</li> <li>• Settings of Listed Buildings</li> <li>• Settings of Registered Parks and Gardens (grade I and II*)</li> <li>• Neighbouring land uses</li> <li>• Proximity to sensitive receptors</li> </ul>

Figure 13: Location of proposed new sites and areas



8.14. The new sites/areas, shown in Figure 13 (see also Schedules 2 and 3 in section 9), have been identified for built waste management facilities as it is accepted that the seven North London Boroughs are unable to provide for the development of landfill. The sites and areas are being put forward as they perform well against the NLWP Spatial Strategy which is reflected in the site selection criteria, as well as a range of environmental, social and economic criteria set out in the Sustainability Appraisal Scoping Report.

**Question 7: Do you agree that the above described methodology used to identify potential sites and areas for future waste development is justified and proportionate? If not why not? Please provide an alternative approach.**

## 9. Policies

- 9.1. The policies set out in this chapter will sit within the planning framework (called the 'development plan') which includes the Mayor's London Plan and individual borough Local Plans and guidance (see Figure 1). All planning applications for waste uses will be assessed against the following NLWP policies and other policies in the development plan. Any proposals for waste development will be expected to take account of the full suite of policies. 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).
- 9.2. The NLWP policies will help deliver the NLWP's aim and objectives, spatial strategy and Provision for North London's Waste to 2032. The supporting text sets out why the particular policy approach has been chosen, any alternatives considered and how the policy will be implemented.
- 9.3. The policies are:
- Policy 1: Safeguarding of existing waste management sites
  - Policy 2: Site allocations
  - Policy 3: Area allocations
  - Policy 4: Unallocated sites
  - Policy 5: Re-use & Recycling Centres
  - Policy 6: Assessment criteria for waste management facilities and related development
  - Policy 7: Energy recovery and decentralised energy

### Policy 1: Safeguarding of existing waste management sites

#### Policy 1: Safeguarding of existing waste management Sites

All existing waste management sites identified in *Schedule 1: Existing safeguarded waste sites in North London* are safeguarded for waste use.

Applications for non-waste uses on safeguarded waste management sites will only be permitted where it is clearly demonstrated (by the applicant) to the satisfaction of the relevant borough that compensatory capacity will be delivered on a suitable replacement site within North London which provides equivalent to, or greater than, the maximum annual throughput that the existing site can achieve.

Development proposals in close proximity to sites allocated for waste use which would prevent or prejudice the use of those sites for waste purposes will be resisted unless suitable compensatory provision has been made.

**This policy helps meet strategic objectives SO2 and SO3**

**This policy contributes towards spatial strategy components A and C**

- 9.4. The purpose of Policy 1 is to ensure that the existing waste management capacity in North London is protected. *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. If, for any reason, an existing waste management site is lost to non-waste use, compensatory provision will be required. Replacement provision will be calculated using the maximum throughput (tonnes per annum) that the site has achieved over the last five years. Safeguarding existing waste management capacity is important because the predicted need for additional waste management capacity in North London relies on existing capacity continuing throughout the plan period. If existing facilities were lost and the capacity not replaced elsewhere, this would result in additional waste management sites and facilities being required. Existing waste sites serving the North London Boroughs are therefore essential to the delivery of the NLWP. Due to London Plan and borough policy requirements to safeguard waste sites, it is considered that there are no alternatives to this aspect of Policy 1.
- 9.5. Policy 1 also seeks to protect allocated waste sites, which includes those in Schedules 1 and 2 (once adopted), from the influence of an adjacent incompatible use prejudicing the continuation of the waste operations. Waste management facilities have an important role to play in ensuring that our communities are sustainable. Identifying and safeguarding suitable sites for waste management facilities is challenging with issues relating to public amenity, access, hydrology, and geology, amongst others, to consider. In addition, waste management is a relatively 'low value' land use which cannot compete with 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 management capacity as well as helping meet waste recycling, diversion and recovery targets. This would undermine the continued operation of existing waste facilities across North London and consequently the overall deliverability of the NLWP.



Question 16: Do you know of any existing waste facilities which are not included in Schedule 1 in Appendix 1? If so, please provide details.

## **Policies 2 and 3: Site and Area allocations**

- 9.6. Policies 2 and 3 identify sites and areas and their suitability for a range of built waste management facilities. 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. If the NLWP did not allocate any sites or areas in the plan for future waste development, this would mean the plan would not conform to these requirements and thus render it unsound.
- 9.7. The NLWP data study has identified capacity gaps for waste management during the plan period for the preferred option of net self-sufficiency. The purpose of Policies 2 and 3 is to ensure that sufficient land is allocated to accommodate built waste management facilities to deal with these identified capacity gaps for North London.
- 9.8. To this end, the NLWP identifies both sites and areas to provide land suitable for the development of waste management facilities. A 'site' is an individual plot of land that will be safeguarded for waste use, whereas an 'area' comprises 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. Allocating sites helps the boroughs to meet their combined apportionment targets in conformity with the London Plan and creates certainty in terms of deliverability. This is complemented by identification of areas suitable for waste uses, subject to detailed site assessment at planning application stage, which will help to achieve net self-sufficiency whilst encouraging co-location of facilities (an objective of the NPPW and spatial strategy). Additionally, some waste operators have indicated a preference for areas insofar as it provides greater flexibility to seek more favourable commercial terms for individual sites within an area. Further detail on the sites and areas approach is set out in the Sites and Areas Report which accompanies the Plan.

- 9.9. The sites and 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 and the spatial strategy. There is no sequential preference or priority of Site allocations in Policy 2 over Area allocations in Policy 3.
- 9.10. The sites and areas have been identified following a search and assessment process, the results of which are summarised in the proformas in Appendix 2. These indicate the size of each site/area, the type of facility likely to be accommodated on the site/area, and any mitigation measures which may be required. Developers should be aware that any use listed as potentially suitable is subject to consideration against the full suite of relevant planning policies/guidance as outlined in section 1 and will be assessed with regards to local circumstances as part of the planning application process.
- 9.11. The ability of sites and areas to accommodate a range of types and sizes of waste management facility is important to the flexibility of the Waste Plan. Table 8: Key to Waste Management Facility Types contains a full list of the types of facilities which were considered when assessing sites and which may be required over the plan period to meet the identified capacity gap. The facility types identified are broad categories which may come forward over the plan period and are indicative at this stage. 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 Criteria 2 of Policies 2 and 3 which requires the highest practicable level of recycling and recovery of materials to be achieved in line with the principles of the waste hierarchy.
- 9.12. The NLWP recognises that currently emerging or unknown waste management technologies, not listed in Table 8 'Key to Waste Facility Types', may be proposed on allocated sites 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.

Table 8: Key to Waste Management Facility Type

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

9.13. The North London Boroughs support a move towards a circular economy. A circular economy is “an alternative to a traditional linear economy (make, use, dispose) in which resources are kept in use for as long as possible to extract the maximum value from them whilst in use, then recover and regenerate products and materials at the end of each service life”<sup>9</sup>. It is an economic model that moves beyond recycling towards a supply chain that is less dependent on primary energy and materials, resulting in both environmental and economic gains<sup>10</sup>. The stimulus for a circular economy is likely to come from commercial interests and the manufacturing industry and is now only at the beginning of the journey. However, the NLWP plans for waste over a 15 year period and as the circular economy develops, new opportunities may arise for this type of waste management in North London.

9.14. A full assessment of the suitability of the site/area for a facility type should be prepared by the developer prior to applying for planning permission. This will allow for a more detailed analysis and consideration of potential impacts associated with a specific proposal at the planning application stage.

## Policy 2: Site allocations

Sites identified in *Schedule 2: NLWP Site Allocations* will be allocated and safeguarded for waste use.

<sup>9</sup> [WRAP definition](#)

<sup>10</sup> Further information on the circular economy is available from sources such as the [Ellen MacArthur Foundation](#)

Applications for waste management development on sites identified in *Schedule 2: NLWP Site Allocations* will be permitted where the applicant can demonstrate that:

- a) The proposal is in line with relevant aims and policies in the North London Waste Plan, the London Plan, Local Plans and related guidance and;
- b) The development results in highest practicable level of recycling and recovery of materials in line with the principles of the waste hierarchy

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

**This policy contributes towards spatial strategy components A, B and F**

**Table 9: Schedule 2 Site Allocations**

Site Ref	Site Name	Size (ha)	Borough	Waste Facility Type				
				A	B	C	D	E
S01-BA	Geron Way/Edgware Road	3.28	Barnet	As planning permission				
S02-EN	Bilton Way	0.4	Enfield	X				X
S03-HC	Eagle Wharf Road	0.52	Hackney	X				X

9.15. All sites identified in *Schedule 2: NLWP Site Allocations* will be safeguarded for waste development to provide certainty to the waste industry that these sites are suitable locations for future waste development in North London and to help the North London boroughs meet the London Plan Apportionments as set out in Chapter 4.

### **Policy 3: Area Allocations**

Areas listed in *Schedule 3: NLWP Area Allocations* and *Schedule 4: LLDC Allocations* are identified as suitable for built waste management facilities.

Applications for waste management development within areas identified in Schedule 3 will be permitted where the applicant can demonstrate that:

- a) The proposal is in line with relevant aims and policies in the North London Waste Plan, the London Plan, Local Plans and other related guidance and;
- b) The development results in the highest practicable level of recycling and recovery of materials in line with the principles of the waste hierarchy.

Applications for waste management development within areas identified in Schedule

4 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 strategy components H, I and M

**Table 10: Schedule 3 Area Allocations**

Area ref	Area Name	Area (ha)	Borough	Waste Facility Type				
				A	B	C	D	E
A01-BA	Meadow Works	0.5	Barnet	X				
A02-BA	Oakleigh Road	3.1	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
A06-BA	BT Depot and Jewsons	0.7	Barnet	X				X
A07-EN	Freezywater	10.7	Enfield	X	X		X	X
A08-EN	Brimmsdown	134.4	Enfield	X	X	X	X	X
A09-EN	Redburn Trading Estate	4.0	Enfield	X				X
A10-EN	Meridian Business Park	14.9	Enfield	X	X	X	X	X
A11-EN	Montagu Industrial Area (North)	9.5	Enfield	X	X	X		X
A12-EN	Eley's Estate	61.6	Enfield	X	X	X	X	X
A13-EN	Commercial Road and North Middlesex Estate	10.0	Enfield	X		X		X
A14-HC	Theydon Road	4.3	Hackney	X				X
A15-HC	Millfields LSIS	2.1	Hackney			X		
A16-HC	Hackney Downs	0.55	Hackney	X				
A17-HC	Mare Street	0.46	Hackney	X				
A18-HC	Oak Wharf	1.5	Hackney			X		X
A19-HR	Brantwood Road	16.9	Haringey	X			X	X
A20-HR	Willoughby Lane	1.1	Haringey	X				X
A21-HR	North East Tottenham	15.4	Haringey	X			X	X
A22-HR	Friern Barnet Sewage Works/ Pinkham Way	5.93	Haringey	X	X			X
A23-HR	Wood Green (LEA 19), Coburg Road	11.5	Haringey		X	X		X
A24-WF	Argall Avenue	27.9	Waltham Forest	X	X			X
A25-EF	Auckland Road	1.26	Waltham Forest	X				X

**Table 11: Schedule 4 LLDC Area Allocations**

Area ref	Area Name	Area (ha)	Borough	Waste Facility Type				
				A	B	C	D	E
LLDC1-HC	Bartrip Street	0.6	Hackney	X				X
LLDC2-HC	Palace Close	0.33	Hackney	X				X

Area ref	Area Name	Area (ha)	Borough	Waste Facility Type				
				A	B	C	D	E
LLDC3-WF	Temple Mill Lane	2.1	Waltham Forest	X	X			X

9.16. As noted in Section 1, 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 areas identified in the LLDC Local Plan that may be appropriate for waste related uses.

9.17. Each Area identified has been considered with regard to the potential uses which may be suitable, with some areas having been split to recognise the specific constraints surrounding sites. For the purpose of estimating waste management capacity associated with allocated areas, assumptions have been made about likely future availability of suitable land within the boundaries based on past turnover and the ability for waste uses to compete against other land uses (see Sites and Areas Report). Unlike Sites, Areas cannot be and are not safeguarded solely for waste use only.

Question 10: Do you agree with the draft policies for development on new sites and areas? If not, please provide reasons why and suggest an alternative

Question 11: Do you have any comments on the accuracy of the details in the sites and areas proformas in Appendix 2? Do you have any additional sites or areas you wish to put forward for consideration?

## Policy 4: Unallocated Sites

#### **Policy 4: Unallocated Sites**

Applications for waste development on unallocated sites outside of the sites and areas identified in Schedules 1-3 must clearly demonstrate to the satisfaction of the relevant borough that the proposal:

- a) fits within the NLWP spatial strategy, and contributes to the delivery of the NLWP aim and objectives;
- b) is in line with relevant aims and policies in the NLWP, London Plan, Local Plans and related guidance; and
- c) demonstrates consistency with the site assessment criteria used for the identification of the sites/areas.
- d) results in highest practicable level of recycling and recovery of materials in line with the principles of the waste hierarchy

**This policy helps meet strategic objectives SO2 and SO3**

**This policy contributes towards spatial strategy components B and G**

- 9.18. The purpose of this policy is to ensure that any development for waste management facilities which does not form part of the planned strategy in the NLWP provides a positive contribution to waste management in North London.
- 9.19. Policy 4 also provides an opportunity to develop a wider network of sites across the area, in line with the Spatial Strategy. Existing and new waste sites/areas are mostly concentrated in the east and west of North London and this policy also allows new sites to come forward across the area where demand and commercial opportunity arise.
- 9.20. Notwithstanding the allocation of sites and identification of areas (Policies 2 and 3), there may be instances in the future where advances in waste technologies are such that the allocated sites/areas do not meet the technical requirements of a proposed waste management facility, for example, the identified sites 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.
- 9.21. An alternative approach to Policy 4 would be to permit waste development only in locations identified in Schedules 1-4. However this would leave boroughs with a policy gap for determining an application should a proposal for a waste management facility come forward on an unallocated site.
- 9.22. Proposals for waste development on unallocated sites would be expected to be in line with the London Plan, the NLWP, and Local Plans. Proposals for waste management facilities on unallocated sites will be assessed against the



same planning and spatial criteria (Table 7, Chapter 5) used for the identification of sites and areas in the NLWP, and any other relevant material consideration.

Question 14: Do you agree with the inclusion and provision of the policy on unallocated sites? If not, please provide an alternative approach.

**Policy 5 – Re-use & Recycling Centres**

**Policy 5 – Re-use & Recycling Centres**

Proposals for Re-use & Recycling Centres will be permitted where:

- a) They 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 the proposal:
- 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 strategy components B and G**

9.23. 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 nine RRCs in North London of which seven are the responsibility of the North London Waste Authority (NLWA). 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<sup>11</sup>. The Spatial Strategy seeks 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. Policy 5 aims to address this aim.

9.24. 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

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<sup>11</sup> Household Waste Recycling Centre Policy, North London Waste Authority (June 2010)  
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of materials likely to be received. There may be scope to provide localised recycling centres as part of major new development.

Question 18: Do you agree with the locations identified as being in need for new Re-use & Recycling Centres?

**Policy 6: Assessment Criteria for waste management facilities and related development**

**Policy 6: 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 council that:

- a) the facility will be enclosed
- b) the amenity of local residents is protected
- c) adequate means of controlling noise, vibration, dust, litter, vermin, odours, air and water-borne contaminants and other emissions are incorporated into the scheme;
- d) there is no significant adverse effect on the established, permitted or allocated land uses likely to be affected by the development;
- e) the development is of a scale, form and character in keeping with its location and incorporates a high quality of design;
- f) there is no significant adverse impact on the historic environment or the recreational, open space and landscape character of the area
- g) active consideration has been given to the transportation of waste by modes other than road, principally by water and rail;
- h) There are no significant adverse transport effects outside or inside the site as a result of the development;
- i) the development makes the fullest possible contribution to climate change adaptation and mitigation, including contributions to the development of decentralised energy networks;
- j) the development has no significant adverse effects on local biodiversity and that there are no likely significant impacts or adverse effects affecting the integrity of an area designated under the Habitats Directive;
- k) there will be no significant impact on the quality of underlying soils, surface or groundwater;
- l) the development does not increase flood risk, and aims to reduce risk.

This policy helps meet strategic objectives SO4, SO5, SO7 and SO8

This policy contributes towards spatial strategy component E

- 9.25. Policy 6 seeks to ensure that the construction and operation of waste management facilities do not give rise to an unacceptable impact, or harm the amenity of local residents or the environment. Applicants will need to demonstrate that appropriate measures have been taken to minimise any potential impacts from new waste development and to enhance the quality of the surrounding area where possible.
- 9.26. The North London boroughs expect well controlled and well-designed waste facilities capable of fitting in with surrounding land uses and to act as good neighbours. When assessing planning applications for waste uses, in addition to Policy 6, the boroughs will also have regard to the criteria in Appendix B of the National Planning Policy for Waste (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 Waste Planning Authority prior to submitting a planning application to discuss relevant matters.
- 9.27. Waste management 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 management facilities are often seen as bad neighbours, due largely to problems associated with open air facilities. Enclosed facilities are similar in appearance to modern industrial shed developments such as factories or logistics facilities and it is this type of facility that is the focus of the NLWP site allocations. 'Open' facilities are unlikely to be suitable for North London as outlined in the Chapter 3 of the Plan.
- 9.28. 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 these 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.
- 9.29. Good design is fundamental to the development of high quality waste infrastructure and the North London boroughs seek innovative approaches,

where appropriate, to deliver high quality designs and safe and inclusive environments. The design and access statement should set out how the development takes on board good practice such as the Defra/CABE guidance on designing waste facilities<sup>12</sup>. The Design and Access Statement should set out how the siting and appearance complements the existing topography and vegetation. Materials and colouring need to be appropriate to the location.

- 9.30. The Design and Access Statement 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. Design and Access Statements 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, the implementation 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.
- 9.31. Waste and recyclables require transportation at various stages of their collection and management. North London is characterised by heavy traffic on all principal roads. That is why developers need to make every endeavour to use non-road forms of transport if at all possible and to set this out in a Transport Assessment. 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.
- 9.32. Applicants will need to submit Transport Assessment in line with the relevant borough Local Plan policy. 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.
- 9.33. Sustainable design, construction and operation of waste management development will be assessed against relevant borough Local Plan policies. Consideration should be given to how the development contributes to the mitigation of and adaption to climate change, promotes energy and resource

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<sup>12</sup> Designing waste facilities – a guide to modern design in waste, Defra & CABE, 2008

efficiency during construction and operation, 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. Production of Site Waste Management Plans will also be required prior to the commencement of construction of the development.

9.34. Waste developments should be designed to protect and enhance local biodiversity. No development will be allowed that will have likely significant impacts on any area designated under the Habitats Directive. Assessments undertaken for the plan have identified sites of European Community importance within and nearby the plan area. Sites 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 impacts on any of these sites are acceptable. 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. 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.

9.35. 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. The following waste facilities are considered lower risk and are more likely to be acceptable:

- Waste Incineration,
- 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.

Higher risk waste uses are less likely to be acceptable in source protection zone 1.

- 9.36. 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.
- 9.37. The North London Strategic Flood Risk Assessment (SFRA) and individual borough 'Level 2' SFRAs have demonstrated the risks from flooding from various sources across North London and site specific flooding assessments have been undertaken on new sites/areas in schedules 2-4. 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 in line with the National Planning Practice Guidance (NPPG). Waste facilities are often characterised by large areas of hardstanding for vehicles and large roof areas. Developments will be required to show that flood risk would not be increased as part of the development and, where possible, will be reduced overall through the use of sustainable urban drainage systems 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.
- 9.38. 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 the proposed waste development which is required to have an Environmental Impact Assessment will also require a Health Impact Assessment.
- 9.39. Applications will be assessed against the full suite of relevant national, London Plan and Local Plan requirements. However, given the status of the NLWP as a multi-Borough Development Plan Document which will form part of the Local Plan of each of the seven Boroughs, Policy 6 is considered a valuable signpost to impacts that will be considered in the determination of applications.

Question 17: Do you agree with assessment criteria for waste management facilities and related development? If not, please suggest alternatives

## Policy 7: Energy Recovery and Decentralised Energy

### **Policy 7: Energy Recovery and Decentralised Energy**

All waste management facilities should include measures to minimise carbon emissions and maximise the use of lower-carbon energy sources.

Where waste cannot be managed at a higher level in the waste hierarchy and recovery of energy from waste is feasible, waste developments 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.

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.

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.

Land and routes required for proposed future connections and/or supply to existing or proposed decentralised energy networks will be safeguarded both on-site and off-site where necessary.

**This policy helps meet strategic objectives SO1 and SO6**

**This policy contributes towards spatial strategy component D**

- 9.40. 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 all facilities minimise their impact on climate change and that applications for waste management facilities incorporate opportunities for sustainable energy recovery and combined heat and power (CHP) where feasible and practicable. 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.
- 9.41. The National Planning Policy for Waste (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. Due to strong national and regional policy requirements on this, it is considered that there are no alternatives to Policy 6.



- 9.42. National policy for renewable energy says that Local Development Documents, such as the NLWP, should contain policies that promote and encourage, rather than restrict, the development of renewable energy resources. The London Plan includes minimum performance for technologies for generating energy from London's waste, known as the carbon intensity floor. This has been set at 400 grams of CO<sub>2</sub> eq generated per kilowatt hour (kwh) of electricity generated.
- 9.43. The Greater London Authority (GLA) has committed to working with London Boroughs and partners in the private sector to develop opportunities by providing assistance for commercialisation of large decentralised energy projects. Opportunities for district heating were identified across London as part of the Decentralised Energy Master Planning programme led by the GLA in 2008-2010<sup>13</sup>. The programme initially focused on identifying opportunities for district heating networks through heat mapping and energy masterplanning with the London Boroughs..
- 9.44. Work is already underway to progress the delivery of a decentralised network in the Lee Valley known as the Lee Valley Heat Network (LVHN). The LVHN 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. It is intended that the LVHN will initially use heat and steam from the Energy from Waste (EfW) facility at the Edmonton EcoPark, moving energy in the form of hot water and/ or steam through a system of pipes to where it is needed. However, over time, the network will connect additional heat sources, including other waste developments, elsewhere in the Lee Valley.

Question 13: Do you agree with the proposed approach to Energy Recovery and Decentralised Energy? If not, please suggest an alternative.

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<sup>13</sup> London Heat Map – [www.londonheatmap.org.uk](http://www.londonheatmap.org.uk)

## 10. Monitoring and Implementation

### Monitoring the Plan

- 10.1. 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 National Planning Policy for Waste 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. Monitoring of the plan should also identify the proportions of each of these streams which is being managed at different levels in the Waste Hierarchy i.e. being recycled, recovered, reused, to monitor the extent to which the plan is delivering sustainable waste management, while contributing to resource efficiency improvements and climate change mitigation.
- 10.2. 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 allocated sites and areas listed in Policies 1 and 2. The results of monitoring will also play an important role in informing Development Management decisions when authorities determine planning applications for new waste facilities.
- 10.3. Responsibility for monitoring lies with the individual Boroughs; however, as the NLWP has been developed collaboratively it will be necessary to establish an appropriate mechanism to continue to monitor the progress of this joint Plan.
- 10.4. To supplement the Boroughs' annual monitoring, it will be important for the GLA to monitor London Plan Policies 5.16 and 5.17 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

- 10.5. 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 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. 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 wastes cannot be differentiated from those of other activities.

- 10.6. Table 9 identifies the monitoring indicators proposed for each policy in the NLWP and identify targets where appropriate. In some cases it will only be necessary to monitor (ie. count the number of instances of) what has happened in the preceding year. If any targets are not being met after five years from adoption, it is proposed to review the NLWP to assess where changes can and should be made.

**Table 12: NLWP Monitoring Indicators**

Indicator	Target(s)	What it monitors	Outcome(s) sought
1. New waste capacity added by function and type of wastes handled	New waste facilities in line with Table 6: land use requirements	Strategic Aim (capacity supply and self-sufficiency)  Strategic Aim (move waste up Waste Hierarchy)  SO1 (resource efficiency)  SO3 (net self sufficiency)  Meeting Future Requirements as specified in the NLWP  Policy 2: Site allocations  Policy 3: Area allocations  Policy 4: Unallocated sites  Policy 5. Reuse and Recycling Centres	Ensure that new waste facilities will close identified capacity gaps  Support delivery of the London Plan apportionment and the additional capacity required to achieve a net self-sufficient outcome across the principal controlled waste streams
2. Total quantity of waste arisings by waste stream management route	Year on year improvement over appropriate periods to achieve the following:  LACW: 50% recycled / composted by 2020;	Strategic Aim (capacity supply and self-sufficiency)  Strategic Aim (move waste up Waste Hierarchy)	Ensure the NLWP meets EU, national Waste Policy and London Plan targets  Ensure the NLWP delivers a net self-sufficient waste management outcome for the

Indicator	Target(s)	What it monitors	Outcome(s) sought
	<p>aspire to 60% by 2026. Energy recovered from 40% by 2015.</p> <p>CI waste: 70% recycled / composted by 2020, rising to 75% by 2031. Energy recovered from 15% by 2020</p> <p>CD waste: 95% recycled by 2020.</p>	<p>SO1 (resource efficiency)</p> <p>SO3 (net self sufficiency)</p> <p>Meeting Future Requirements as specified in the NLWP</p> <p>National Indicators NI192 and 193 (% LACW diverted and % landfilled)</p>	<p>principal controlled waste streams</p>
<p>3. Number of new waste permissions granted on unallocated site</p>	<p>Monitor only</p>	<p>SO2 (capacity provision and protection)</p> <p>Policy 4: Unallocated sites</p>	<p>Identify the level of capacity coming forward sites that may be less suitable for waste use than those allocated in the Plan</p>
<p>4. Number of existing waste sites and replacement capacity for which permission has been granted for change to non-waste use</p>	<p>None</p>	<p>Strategic Aim (capacity supply and self-sufficiency)</p> <p>SO2 (capacity provision and protection)</p> <p>Policy 1: Safeguarding existing waste management sites</p>	<p>Ensure sufficient capacity of the right type is available throughout the Plan period</p>

Indicator	Target(s)	What it monitors	Outcome(s) sought
5. 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)  SO6 (decentralised energy) Spatial strategy (Provide opportunities for decentralised heat and energy networks  )  Policy 7: Energy recovery and decentralised energy	Contribute to delivery of decentralised energy and incremental improvement in environmental performance with respect to climate change
6. Number of applications for new waste facilities where statutory consultees have raised concerns about potential impacts	0%	SO5 (sustainability)  SO8 (protect the environment)  Spatial strategy (Reduce impact on amenity)  Policy 6: Assessment Criteria for waste management facilities and related development	Avoid impact on sensitive receptors or maximise scope for effective mitigation

## Implementing the Plan

- 10.7. 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.
- 10.8. Implementation has four components – infrastructure delivery; application of the policies to planning applications for waste facilities; ongoing regulation and monitoring of the local waste management sector; and achieving performance levels – each of which involves different actors. Table 10 summarises the organisations involved in each component.

**Table 13: 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
	Regulate / monitor	Inspect operating waste sites periodically  Monitor Plan performance annually
	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 EfW plant  Delivery of other facilities enabling achievement of desired performance levels
	Performance delivery	Prioritising infrastructure delivery that moves waste up the Waste Hierarchy
Landowners	Infrastructure	Propose new waste sites in sustainable areas and sites that delivery capacity



Organisation	Role	Responsibilities
	delivery	requirements
The waste industry	Infrastructure delivery	Propose new waste sites in sustainable areas and sites that delivery capacity requirements  Prioritise management of locally arising waste in local rather than more distant facilities
The Environment Agency	Regulate / monitor	Advise on planning applications according to the nature of the proposal  Assess applications for Environmental Permits  Inspect operating waste sites periodically  Collect and publish information about waste movements for use in Plan monitoring
	Performance delivery	Promote waste reduction initiatives
The Health & Safety Executive	Regulate / monitor	Advise on planning applications according to the nature of the proposal
Other statutory bodies (eg. Natural England)	Regulate / monitor	Advise on planning applications according to the nature of the proposal
The 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	Support to waste collection authorities

Organisation	Role	Responsibilities
	delivery	to deliver desired performance levels  Support / promote waste reduction initiatives

10.9. As the government is no longer awarding Private Finance Initiative credits all new infrastructure required during the Plan period will be funded by private commercial funding through sources that cannot be identified at this time. This will apply to facilities brought forward by private waste contractors and the 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.

10.10. Table 11 sets out how policies in the NLWP will be implemented and who will be involved in each action and which of the Strategic Objectives are addressed as a result.

**Table 14: How the NLWP policies will be implemented**

Mechanism	Stakeholders involved	Objectives implemented
Policy 1: Safeguarding of existing waste management sites		
Refusal of planning permission for non-waste use unless capacity is re-provided	Local planning authorities	SO2, SO3
Policies 2 and 3 Site/Area Allocations		
Planning permission and subsequent development	Landowners and developers / waste management companies / waste disposal authority / local planning authorities / Environment Agency and other statutory bodies	SO1, SO2, SO3, SO5
Policy 4: Unallocated sites		

Planning permission and subsequent development	Landowners and developers / waste management companies / local planning authorities / Environment Agency and other statutory bodies	SO2, SO3
Policy 5: Re-use & Recycling Centres		
Planning permission and subsequent development	Landowners and developers / waste management companies / local planning authorities / Environment Agency and other statutory bodies	SO1, SO2, SO3
Policy 6: Assessment criteria for waste management facilities and related development		
Planning permission and subsequent development	Local planning authorities / Environment Agency and other statutory bodies	SO4, SO5, SO7, SO8
Policy 7: Energy recovery and decentralised energy		
Planning permission and subsequent development	Landowners and developers / waste management companies / local planning authorities / waste disposal authority Environment Agency and other statutory bodies	SO1, SO6

**Question 19: Do you agree with the proposals for monitoring the NLWP and the roles and responsibilities of the bodies involved in implementing it? If not, please state why and suggest an alternative.**

## Appendix 1: Schedule 1: Existing safeguarded waste sites in North London

**Table 15: Schedule 1: Existing safeguarded waste sites in North London**

Site ID	Site Name	Borough
BAR1	Winters Haulage, Oakleigh Road South	Barnet
BAR2	Scratchwood Quarry	Barnet
BAR3	P B Donoghue, Claremont Rd	Barnet
BAR4	W R G, Hendon Rail Transfer Station	Barnet
BAR5	Summers Lane Reuse and Recycling Centre	Barnet
BAR6	Mc Govern Brothers, Brent Terrace, Hendon	Barnet
BAR7	Cripps Skips Brent Terrace	Barnet
BAR8	Apex Car Breakers, Mill Hill	Barnet
BAR9	Railway Arches, Hendon Savacase Ltd	Barnet
BAR10	G B N Services Ltd, New Southgate	Barnet
BAR11	Mill Hill Depot	Barnet
CAM1	Regis Road Reuse and Recycling Centre	Camden
ENF1	Crews Hill Transfer Station	Enfield
ENF2	Barrowell Green Recycling Centre	Enfield
ENF3	Pressbay Motors Ltd, Motor Salvage Complex	Enfield
ENF4	Chase Farm Hospital, the ridgeway (SITA)	Enfield
ENF5	Jute Lane, Brimsdown	Enfield
ENF6	Tuglord Enterprises (AMI Waste Waste) Stacey Avenue	Enfield
ENF7	Budds skips, The Market Compound, Harbert road	Enfield
ENF8	Biffa Edmonton, Adra road, Edmonton	Enfield
ENF9	Hunt Skips, Commercial Road, Edmonton	Enfield
ENF10	Rooke & Co Ltd, Edmonton	Enfield
ENF11	Edmonton Bio Diesel Plant	Enfield
ENF12	Personnel Hygiene Services Ltd, Princes Road, Upper Edmonton	Enfield
ENF13	Lee Valley motors Ltd, Second Avenue, Edmonton	Enfield
ENF14	London Waste Recycling Ltd, 12 Hastingwood Trading Est, upper Edmonton	Enfield
ENF15	Environmental Tyre Disposals Ltd	Enfield

Site ID	Site Name	Borough
ENF16	Albert Works, Kenninghall road, Edmonton	Enfield
ENF17	E L V Limited, Montague road industrial estate (site part of ENF 17 Albert Works)	Enfield
ENF18	London Waste Ltd Composting, Edmonton Eco Park, Advent Way	Enfield
ENF19	London Waste Ltd, Edmonton EcoPark, Advent way	Enfield
ENF21	Edmonton Clinical Waste Treatment Centre	Enfield
ENF22	J O' Doherty Haulage, Nobel Road, Edmonton	Enfield
ENF23	Oakwood Plant Ltd, Edmonton	Enfield
ENF24	Envirocom Ltd, Stonehill Business Park, Edmonton	Enfield
ENF25	Powerday Plant Ltd, Jeffreys Road	Enfield
ENF26	Edmonton EFW	Enfield
ENF27	Kedco	Enfield
ENF28	Ballast Phoenix Ltd	Enfield
ENF29	Enfield Metal Kingswood Nursery, Theobalds Park road	Enfield
ENF30	L & M Skips Recycling Ltd	Enfield
ENF31	Volker Highways Ltd	Enfield
HAC1	Millfields Waste Transfer & Recycling Facility	Hackney
HAC2	Downs Road Service Station (Braydon Motor Company), Clapton	Hackney
HAC3	Recycling facility, Mare Street	Hackney
HAR1/2	Hornsey Central Depot, Haringey LBC	Haringey
HAR 3	Garman Road, Tottenham	Haringey
HAR4	O'Donovan, Markfield Rd, Tottenham	Haringey
HAR5	Redcorn Ltd, White Hart Lane, Tottenham	Haringey
HAR6	Restore Community Projects, Ashley Road, Tottenham	Haringey
HAR7	Brantwood Auto Recycling Ltd, Willoughby Lane	Haringey
HAR8	O'Donovan, Markfield Road, Tottenham	Haringey
HAR9	Park View Road Reuse and Recycling Centre	Haringey
HAR10	Western Road Re-use & Recycling Centre	Haringey
ISL1	Hornsey Street Re-use & Recycling Centre	Islington
WAF1	Mercedes Parts Centre, Chingford Industrial Centre, Hall Lane	Waltham Forest
WAF2	Kings Road Re-use & Recycling Centre	Waltham Forest
WAF3	South Access Road Re-use & Recycling Centre	Waltham

Site ID	Site Name	Borough
		Forest
WAF4	G B N Services, estate Way, Leyton	Waltham Forest
WAF5	T J Autos ( U K) Ltd	Waltham Forest
WAF6	B J Electronics, Ravenswood road Industrial Estate, Walthamstow	Waltham Forest
WAF7	Bywaters Recycling & Waste Management Centre	Waltham Forest
WAF8	Leyton Reuse & Recycling Centre	Waltham Forest
WAF9	B D & G Parts For Rover, Roxwell Trading Park, Leyton	Waltham Forest
WAF10	Malby Waste Disposal Ltd, Staffa Road, Leyton	Waltham Forest
WAF11	Baseforce Metals, Unit 1 Staffa Road, Leyton	Waltham Forest
WAF12	Argall Metal Recycling, Staffa Road Walthamstow Salvage, Wellington works, Staffa road, Leyton (no longer operational)	Waltham Forest
WAF13	Gateway Road Re-use & Recycling Centre (no longer operational)	Waltham Forest
WAF14	Tipmasters	Waltham Forest

**Appendix 2: Individual site/area profiles**

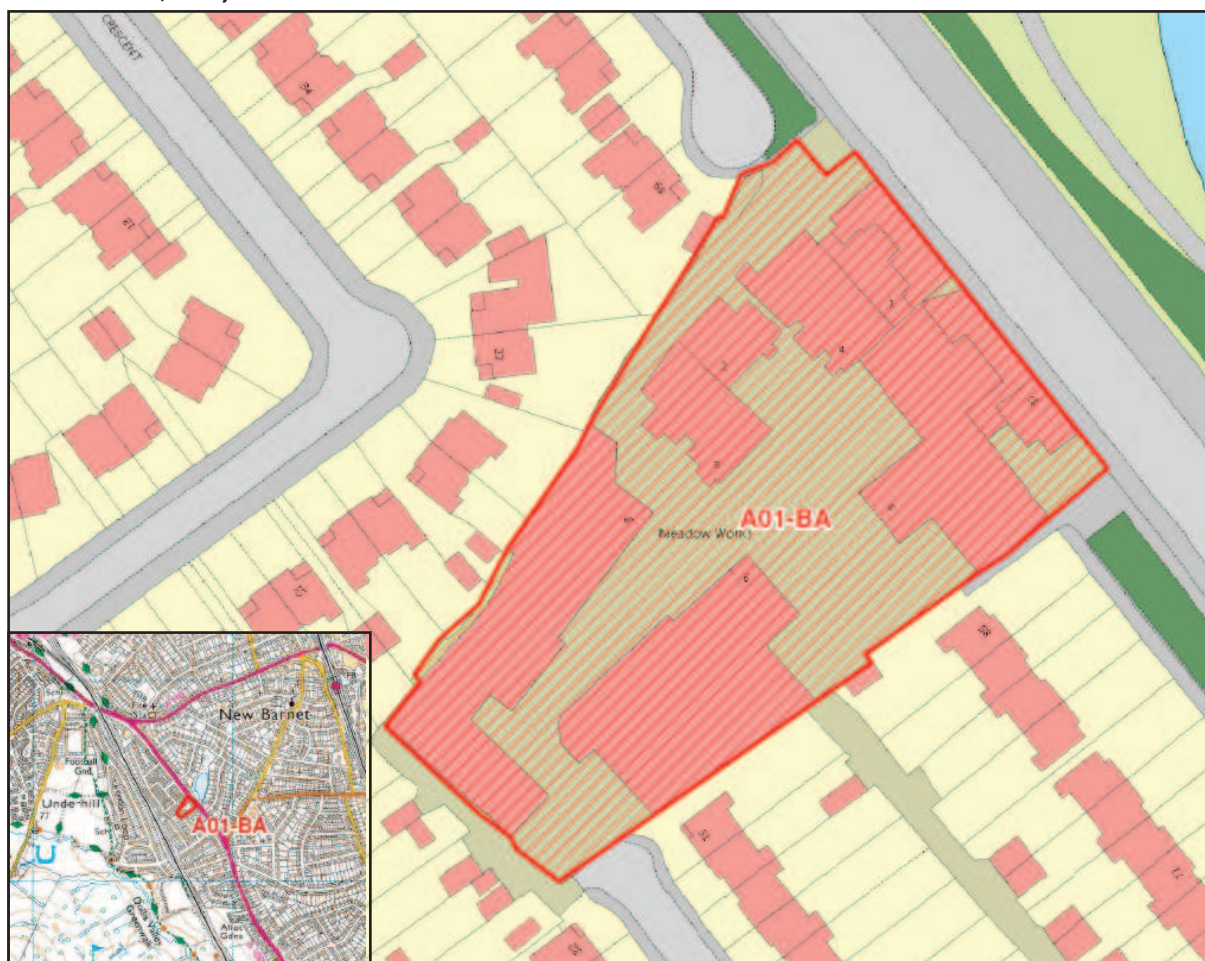


**Barnet Sites and Areas**

A01-BA	Meadow Works (Area)
A02-BA	Oakleigh Road (Area)
A03-BA	Brunswick Industrial Park (Area)
A04-BA	Mill Hill Industrial Estate (Area)
A05-BA	Connaught Business Centre (Area)
A06-BA	BT Depot and Jewsons Building (Area)
S01-BA	Edgware Road and Geron Way

**A01-BA - Meadow Works, Barnet**

1:850 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)



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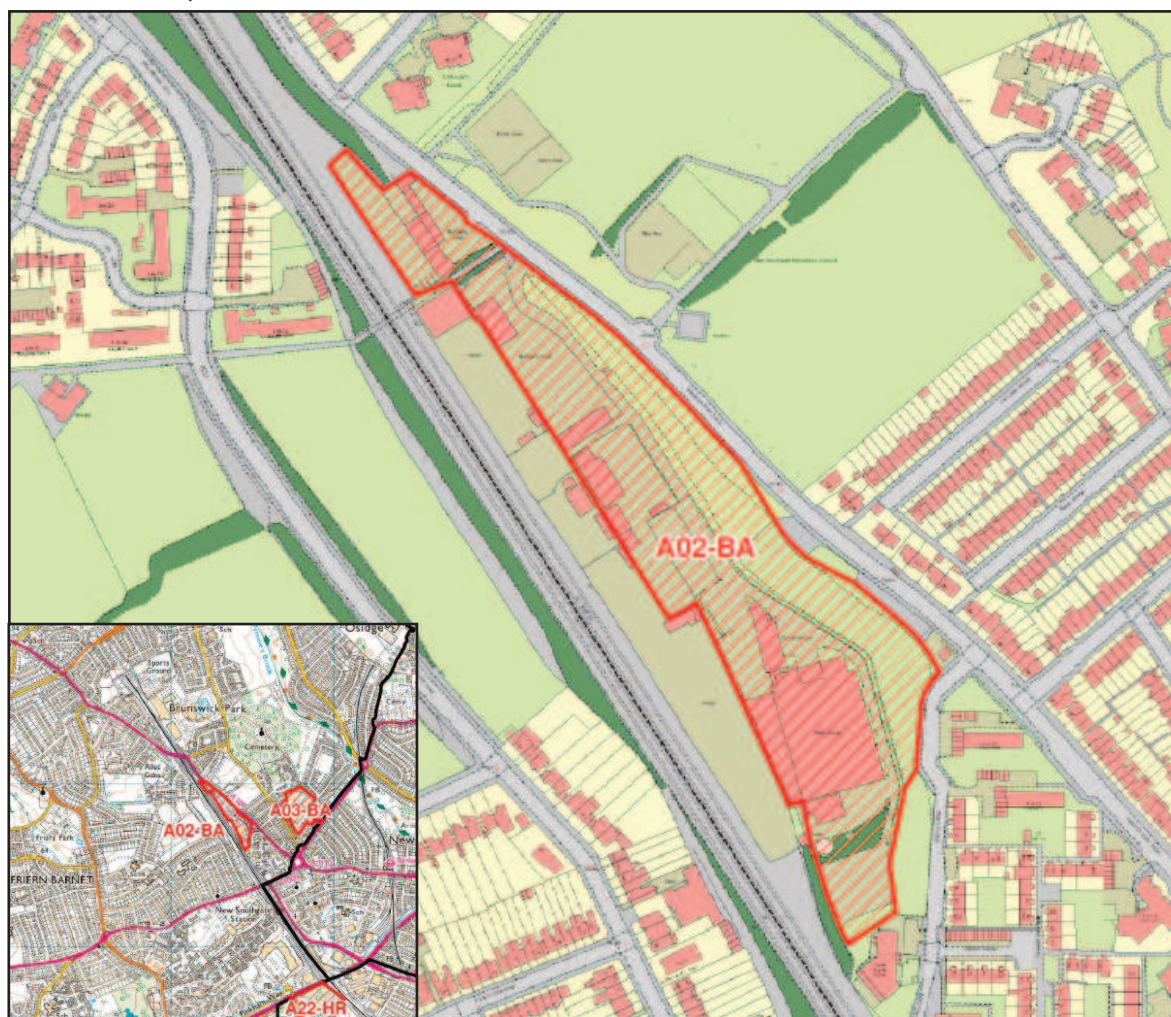
<b>Borough</b>	Barnet
<b>Type of Location</b>	Area
<b>Location Reference</b>	A01-BA - Meadow Works
<b>Size</b>	0.50 ha
<b>Area Description</b>	The area lies within a residential location. The area is occupied by a number of small industrial buildings including a metal recycler.
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Processing and recycling
<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, waste transfer outdoor composting, indoor/in-vessel composting.

<b>Sustainability Appraisal</b>	Band C – Development possible but significant planning issues require mitigation.
<b>Flood Risk Zone</b>	Area within Flood Zone 1 (lowest probability of flooding)
<b>Key Issues</b>	The site is relatively small and has limited potential for development. The surrounding area is residential and development would need to be appropriately designed to ensure there is no significant detrimental impact.
<b>Habitat Regulation Assessment</b>	Site currently being screened



## 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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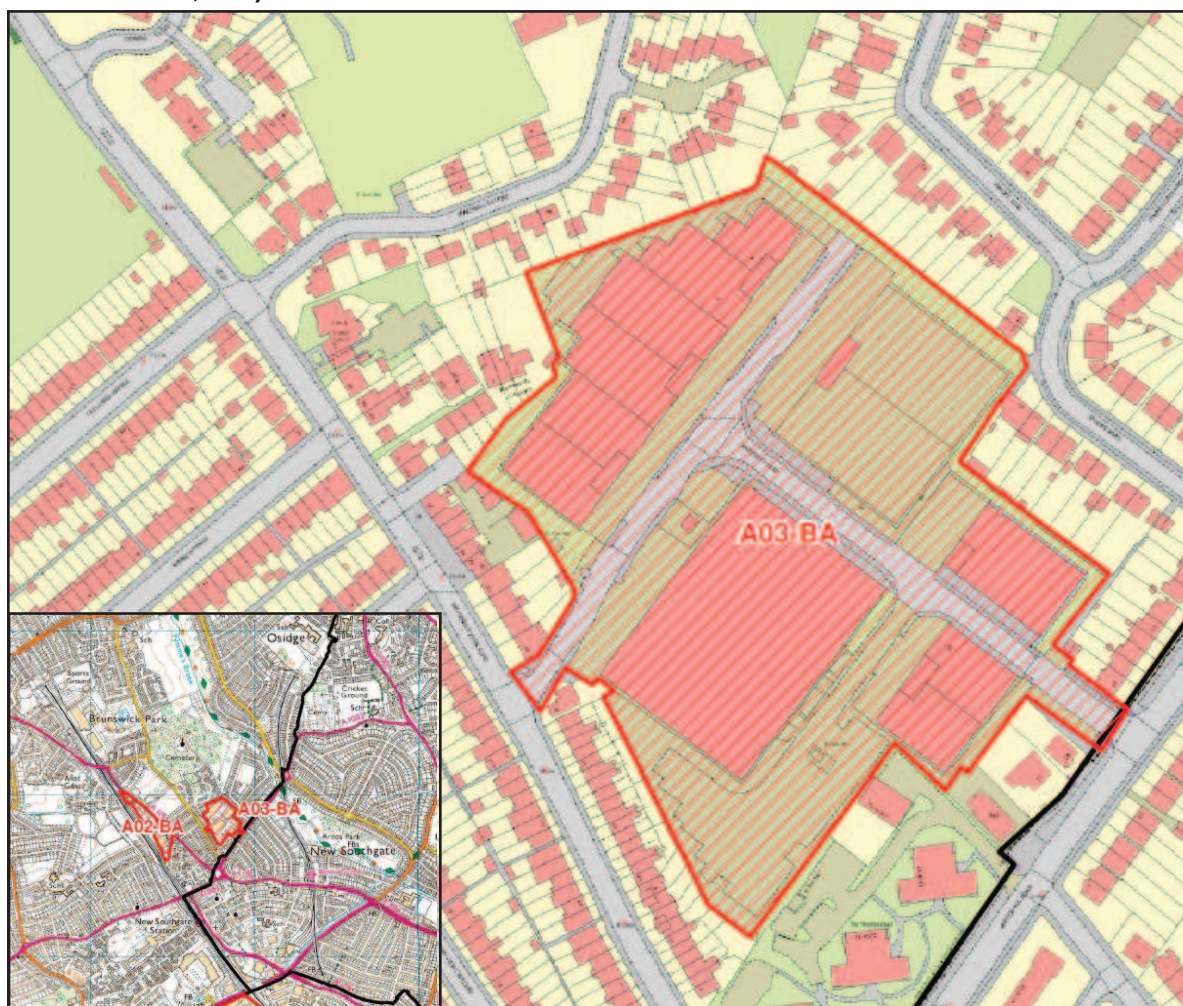
<b>Borough</b>	Barnet
<b>Type of Location</b>	Area
<b>Location Reference</b>	A02-BA - Oakleigh Road
<b>Size</b>	3.10 ha
<b>Area Description</b>	Industrial area, includes a builder's depot and two existing waste management facilities
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Integrated resource recovery facilities/resource parks, Waste transfer, processing and recycling
<b>Uses unlikely to be suitable</b>	Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.

<b>Sustainability Appraisal</b>	Band B – Several issues requiring mitigation however, generally suitable for development.
<b>Flood Risk Zone</b>	Area is within Flood Zone 1 (lowest probability of flooding)
<b>Key Issues</b>	Site already occupied by 2 waste facilities additional facilities unlikely to have significant impact. Residential properties do however lie close to the site so mitigation measure may be required. Vacant plot at site is identified as a potential site for Barents replacement of their Mill Hill Depot.
<b>Habitat Regulation Assessment</b>	Site currently being screened



**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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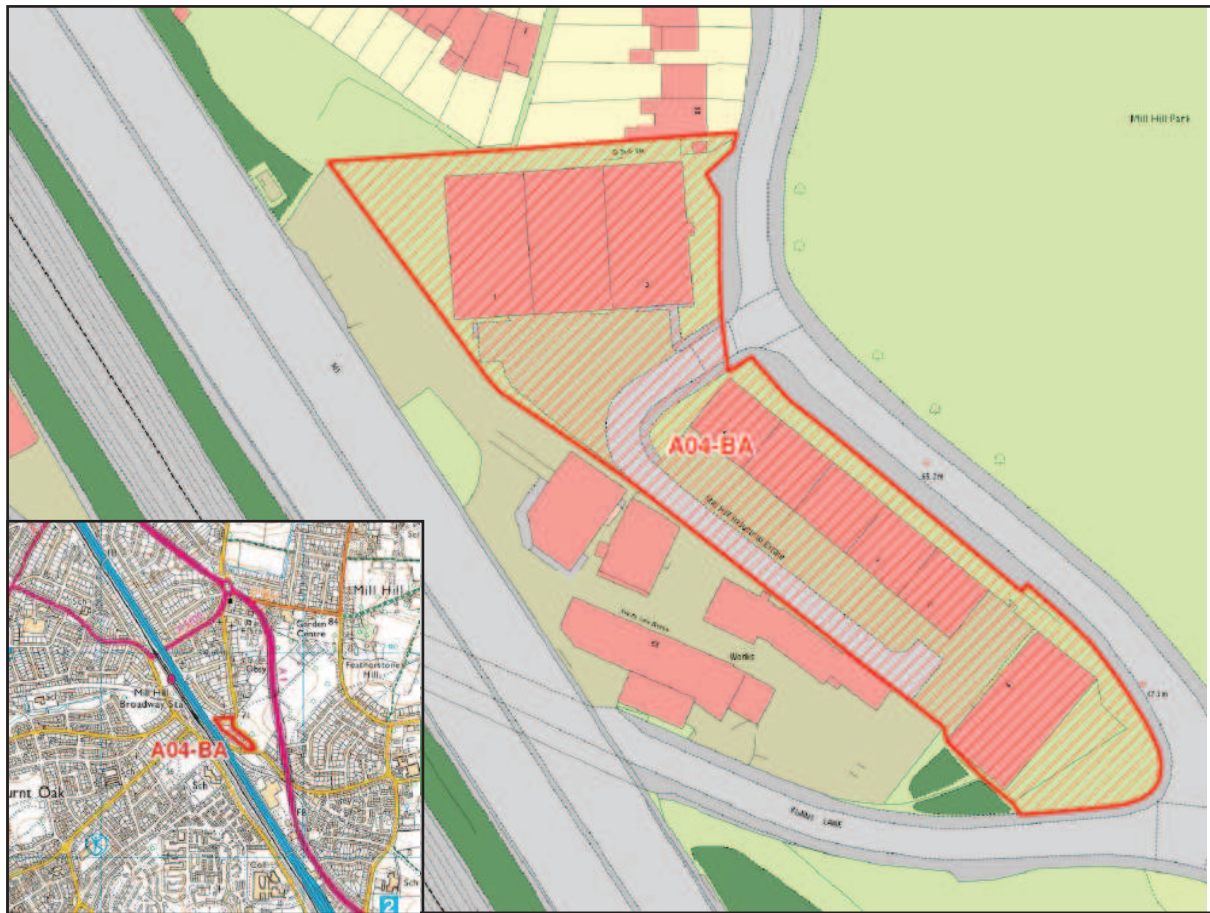
<b>Borough</b>	Barnet
<b>Type of Location</b>	Area
<b>Location Reference</b>	A03-BA - Brunswick Industrial Park
<b>Size</b>	3.95 ha
<b>Area Description</b>	The area is a Business Park which includes a builder's yard and other trade outlets.
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Waste Transfer, Processing and Recycling
<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting

<b>Sustainability Appraisal</b>	Band C – Development possible but significant planning issues require mitigation.
<b>Flood Risk Zone</b>	Flood Zone 1 (lowest probability of flooding)
<b>Key Issues</b>	<p>The site had no empty units at the time of the site visit. The route from the site to the primary road network passes through significant residential development although the traffic flows are likely to be similar to those of the current operations.</p> <p>The site is surrounded by residential dwellings but it is considered that the site could accommodate waste management facilities that did not incorporate any outside storage of waste.</p>
<b>Habitat Regulation Assessment</b>	Site currently being screened



**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)**



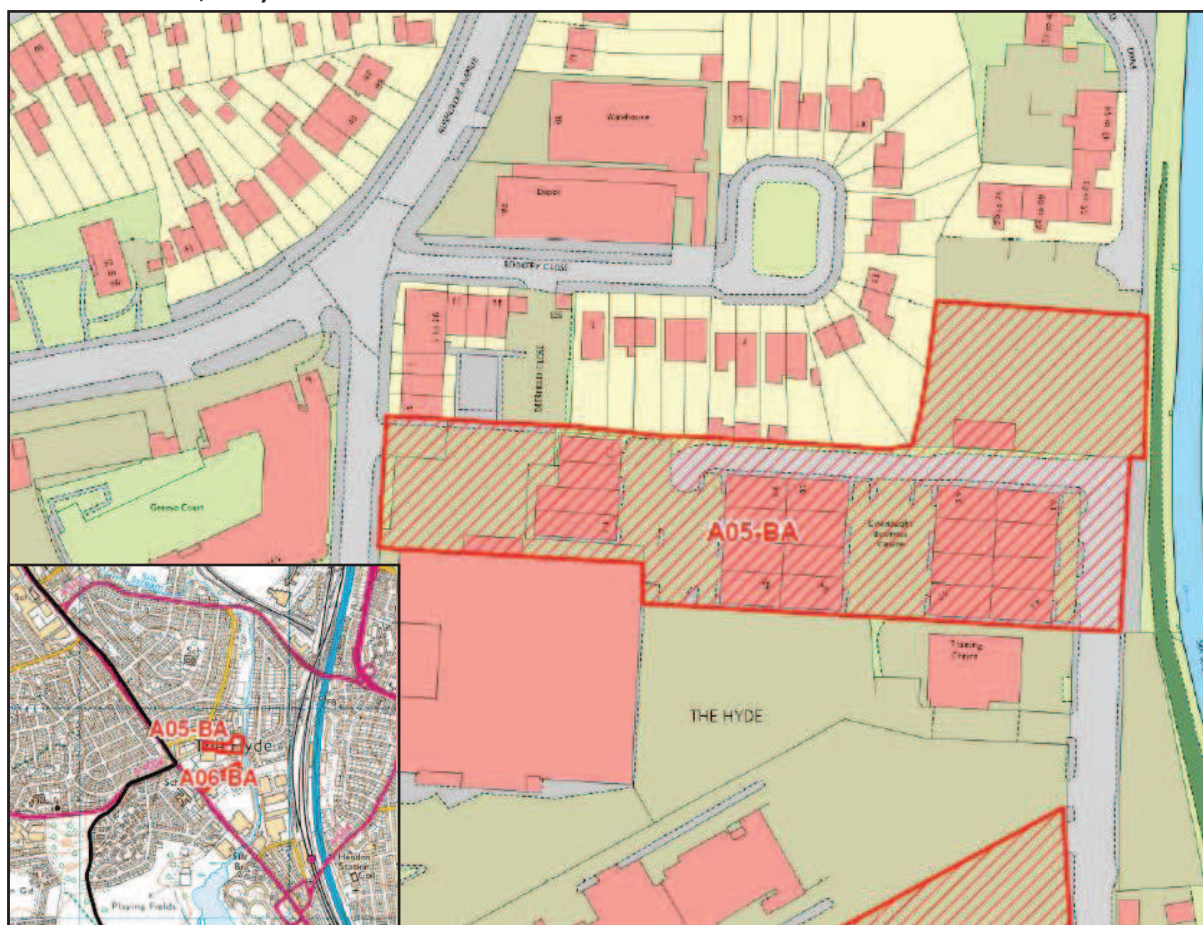
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<b>Borough</b>	Barnet
<b>Type of Location</b>	Area
<b>Location Reference</b>	A04-BA - Mill Hill Industrial Estate
<b>Size</b>	0.90 ha
<b>Area Description</b>	Industrial Estate comprising numerous small warehouses.
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Waste transfer, processing and recycling

<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.
<b>Sustainability Appraisal</b>	Band C – Development possible but significant planning issues require mitigation.
<b>Flood Risk Zone</b>	Area is within Flood Zone 1 (lowest probability of flooding)
<b>Key Issues</b>	The site is in close proximity to open recreational area of Mill Hill Park to the east. There is also a residential area to the north of the site and any waste management facility would need to take account of these sensitive receptors. The units appeared to be fully occupied and they were generally small single story units.
<b>Habitat Regulation Assessment</b>	Site currently being screened

## 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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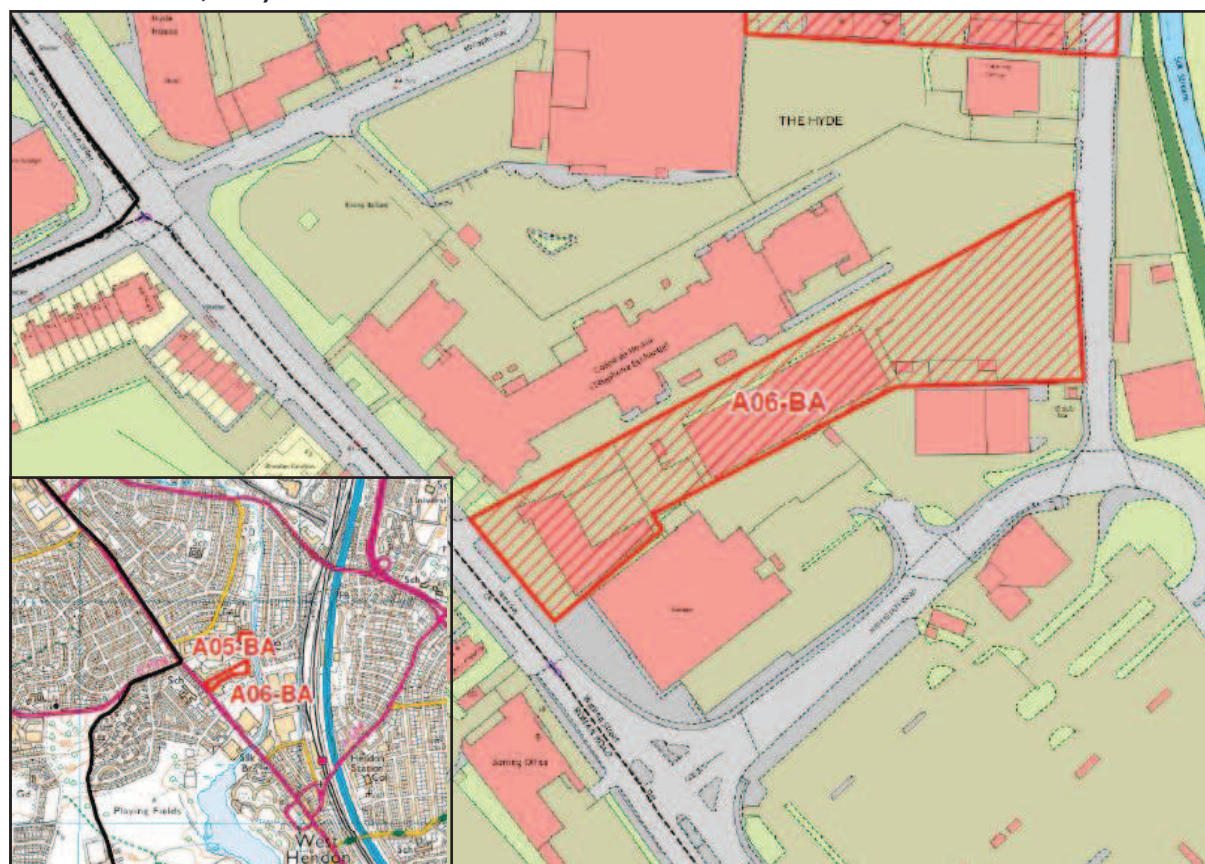
<b>Borough</b>	Barnet
<b>Type of Location</b>	Area
<b>Location Reference</b>	A05-BA - Connaught Business Centre
<b>Size</b>	0.90 ha
<b>Area Description</b>	The site is a commercial area made up of small units.
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Waste transfer, processing and recycling
<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.
<b>Sustainability Appraisal</b>	Band C – Development possible but significant planning issues require mitigation.

<b>Flood Risk Zone</b>	Site is within Flood Zone 2 & 3 (medium and high probability of flooding) As part of the area lies within Flood Zone 3 it is not suitable for the handling of Hazardous Waste.
<b>Key Issues</b>	Although the site access is acceptable, all waste vehicles would need to traverse the internal retail/business park roads. Residential development lies on the northern boundary whilst to the east is a small stream beyond which is further residential development. Due to its proximity to residential development, only enclosed waste management facilities would be appropriate.
<b>Habitat Regulation Assessment</b>	Site currently being screened



**A06-BA - BT Depot and Jewsons Building, Barnet**

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



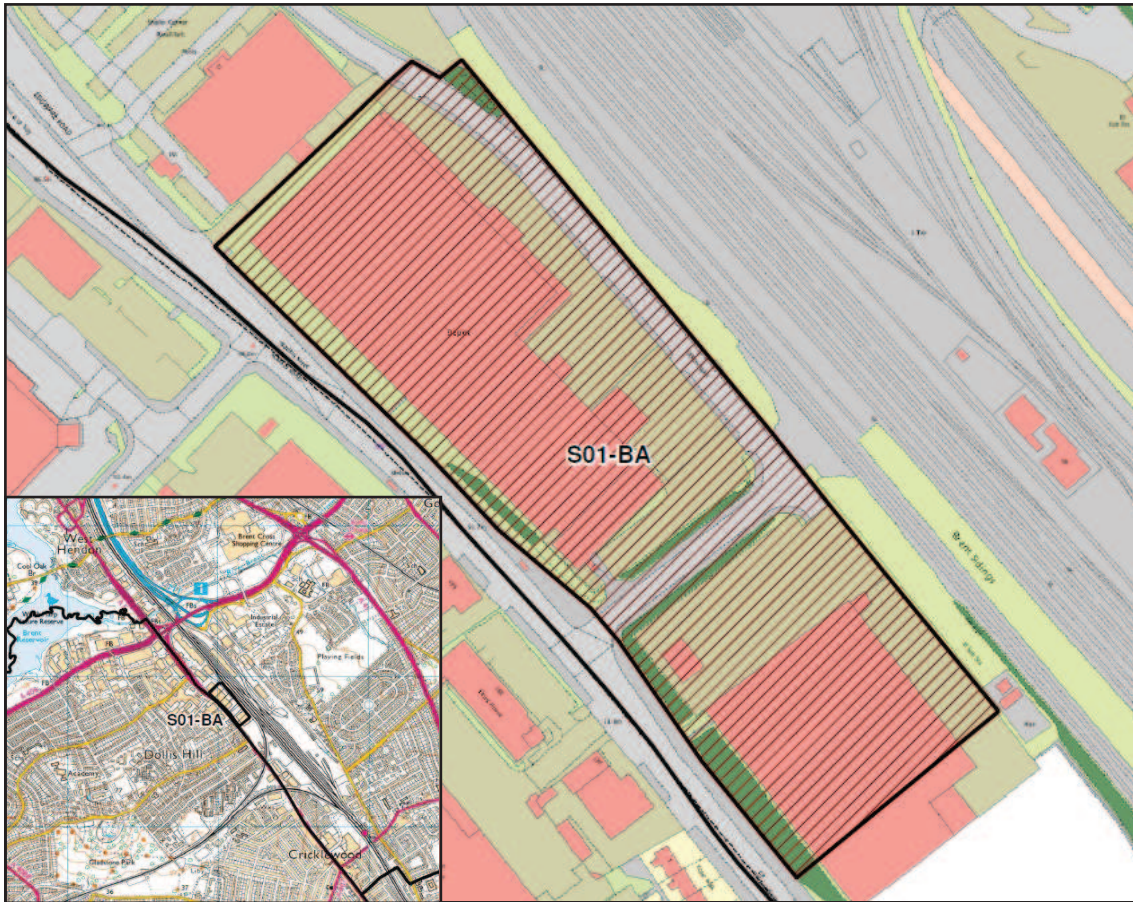
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<b>Borough</b>	Barnet
<b>Type of Location</b>	Area
<b>Location Reference</b>	A06-BA - BT Depot and Jewsons Building
<b>Size</b>	0.70 ha
<b>Area Description</b>	Suzuki dealership and unknown commercial building. Telephone exchange lies to the north and a Honda Garage to south. The site is bordered by the A1 and is 2.8 miles from the M1.
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Waste transfer, processing and recycling
<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.

<b>Sustainability Appraisal</b>	Band C – Development possible but significant planning issues require mitigation.
<b>Flood Risk Zone</b>	Site partially covered by Flood Zone 2 (medium probability of flooding).
<b>Key Issues</b>	<p>The site access is acceptable with entry to the site from Edgware Road. The area that includes the Suzuki dealership and associated car park is unlikely to be deliverable for waste management and should be discounted due to its position fronting Edgware Road and similar neighbouring uses. However the old BT Depot and yard would be suitable for a mix of waste management uses.</p> <p>There are a number of environmental and amenity issues facing the site such as the close proximity of the retail park, Sainsbury supermarket, a small stream, and the surrounding residential development.</p>
<b>Habitat Regulation Assessment</b>	Site currently being screened

### S01-BA - Edgware Road and Geron Way, Barnet

1: 1,950 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)



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<b>Borough</b>	Barnet
<b>Type of Location</b>	Site
<b>Location Reference</b>	S01-BA - Edgware Road and Geron Way
<b>Size</b>	3.28 ha
<b>Site Description</b>	Currently occupied by Bestway Cash and Carry in the north and Selco Builders Warehouse in the south.
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	The site has outline planning permission for a waste handling facility and treatment technology.



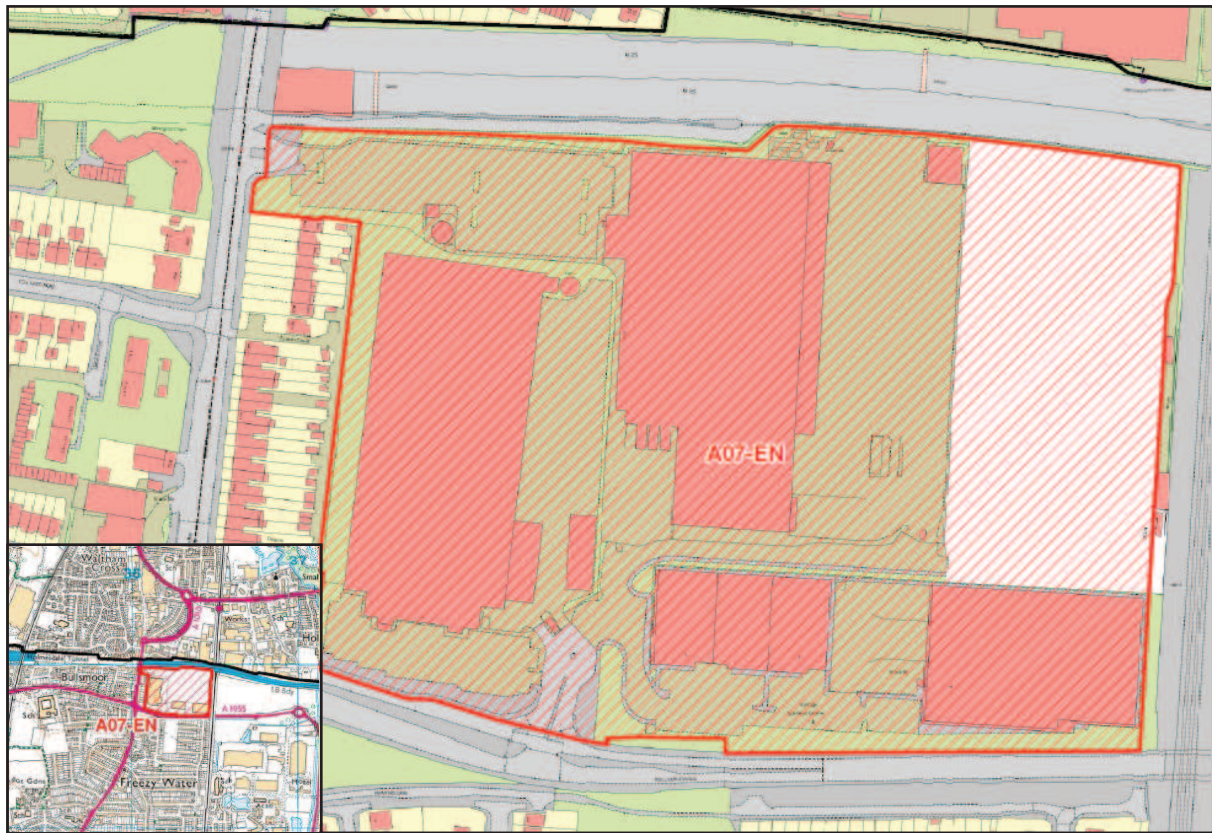
<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting and indoor/in-vessel composting.
<b>Details of in-situ infrastructure impacting waste development</b>	None identified
<b>Landowner details</b>	Bestway Wholesale Group
<b>Flood Risk Zone</b>	Area within Flood Zone 1 (lowest probability of flooding)
<b>Key Issues</b>	The site has outline planning permission for waste management and can be taken forward at this stage. However the north of site is currently occupied and operated by Bestway who have responded during the call for sites exercise on the North London Waste Plan specifically requesting that this site be excluded from allocation.'
<b>Habitat Regulation Assessment</b>	Site currently being screened

**Enfield sites and Areas**

A07-EN	Freezywater (Area)
A08-EN	Brimsgate (Area)
A09-EN	Redburn Trading Estate (Area)
A10-EN	Meridian Business Park (Area)
A11-EN	Montagu Industrial Area (Area)
A12-EN	Eley's Estate (Area)
A13-EN	Commercial Road and North Middlesex Estate (Area)
S02-EN	Bilton Way (Site)

## A07-EN - Freezywater, Enfield

1:2,400 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)



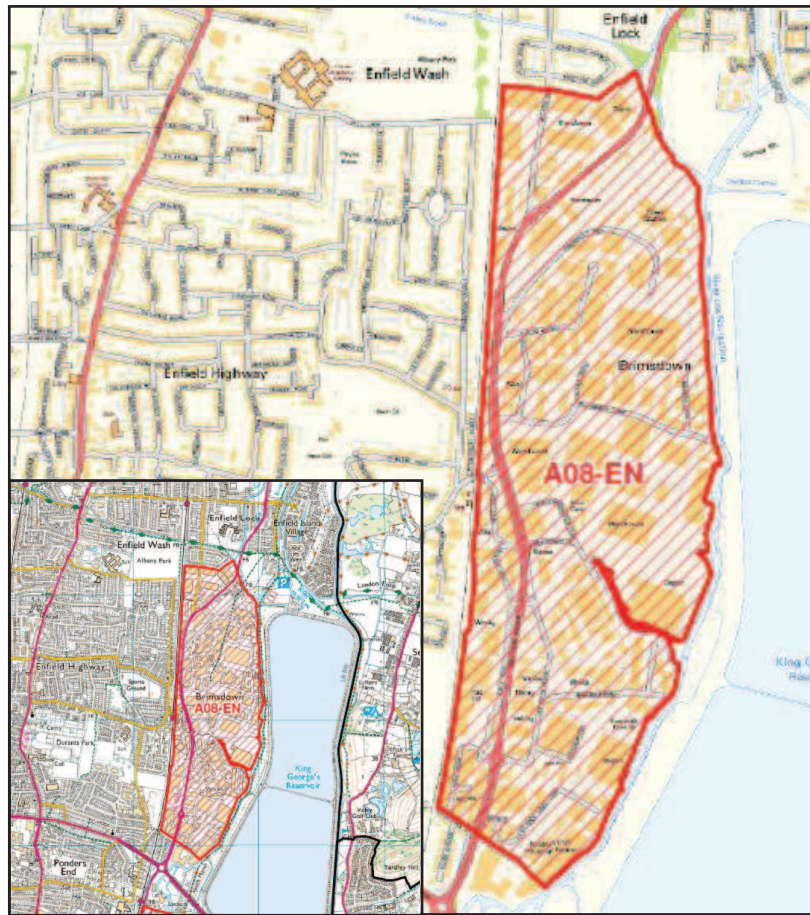
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<b>Borough</b>	Enfield
<b>Type of Location</b>	Area
<b>Location Reference</b>	A07-EN - Freezywater
<b>Size</b>	10.70 ha
<b>Area Description</b>	Large commercial area including a Tesco distribution centre.
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Waste transfer, processing and recycling Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, indoor composting and in-vessel composting.
<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks and outdoor composting.

<b>Sustainability Appraisal</b>	Band B – Several issues requiring mitigation however, generally suitable for development.
<b>Flood Risk Zone</b>	Area is within Flood Zone 1 (lowest probability of flooding)
<b>Key Issues</b>	The site has good access to the M25 and the strategic road network. Any facility would need to take account of neighbouring uses including green belt and Lee Valley Regional park to the east, at the planning stage.
<b>Habitat Regulation Assessment</b>	Site currently being screened

**A08-EN - Brimsdown, Enfield**

1:19,700 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)



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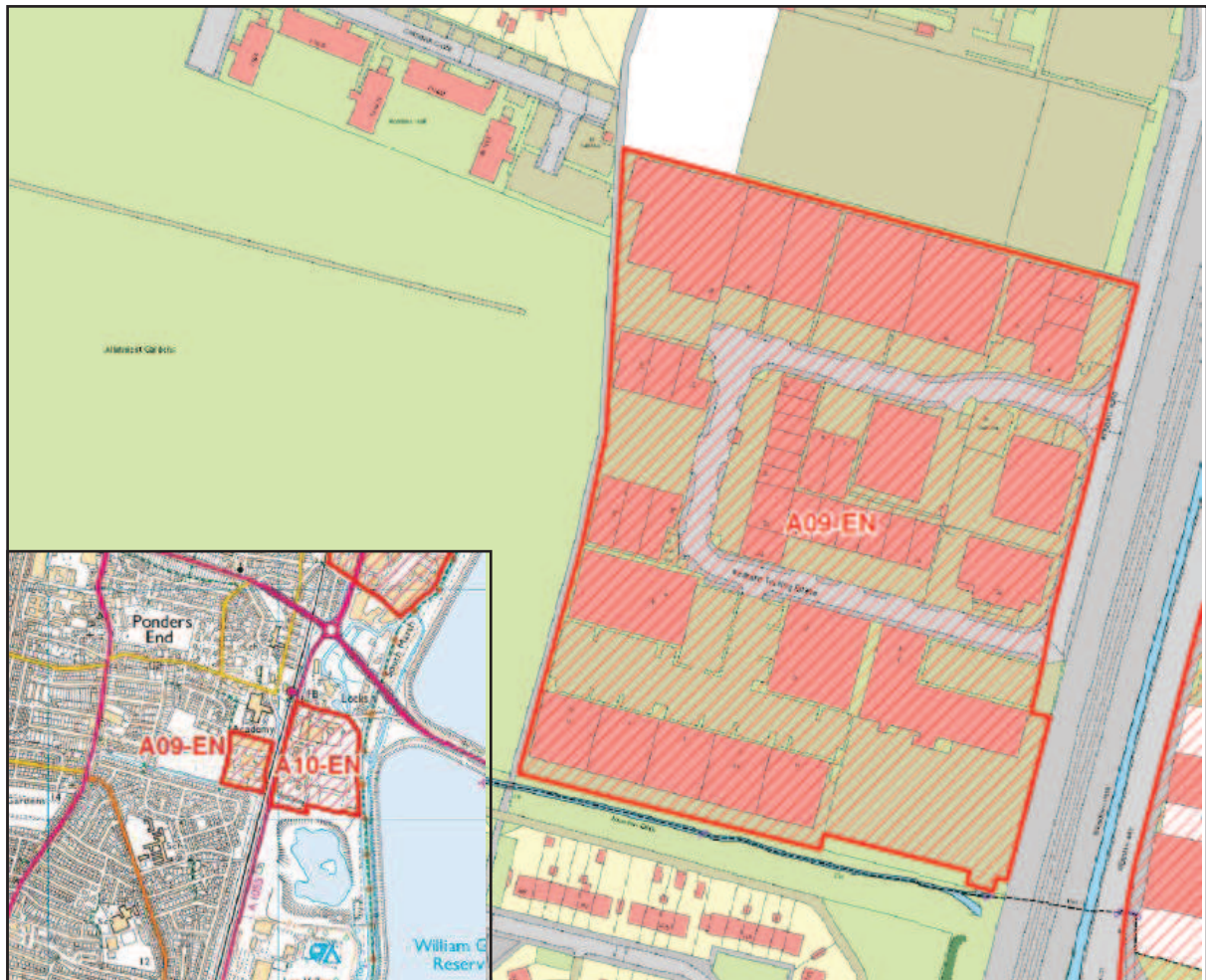
<b>Borough</b>	Enfield
<b>Type of Location</b>	Area
<b>Location Reference</b>	A08-EN - Brimsdown
<b>Size</b>	134.40 ha
<b>Area Description</b>	Industrial Estate
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Integrated resource recovery facilities/resource parks, Waste transfer, processing and recycling, thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, indoor composting and in-vessel composting.
<b>Uses unlikely to be suitable</b>	Outdoor composting

<b>Sustainability Appraisal</b>	Band B – Several issues requiring mitigation however, generally suitable for development.
<b>Flood Risk Zone</b>	Large Parts of site Flood Zone 2 (medium potential of flooding) remaining Flood Zone 1 (lowest potential of flooding). Some areas benefit from flood defences
<b>Key Issues</b>	<p>The Brimsdown Industrial Estate has existing waste management facilities and is large enough to accept most waste management uses.</p> <p>There are a number of environmental and amenity issues facing the site such as the close proximity of enclosed industrial uses, housing, Lee Valley Regional Park, the Green Belt, River Lee Navigation, a reservoir also designated an SSSI and Site of Metropolitan Importance for Nature Conservation.</p>
<b>Habitat Regulation Assessment</b>	Site currently being screened



**A09-EN - Redburn Trading Estate, Enfield**

**1:2,200 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)**



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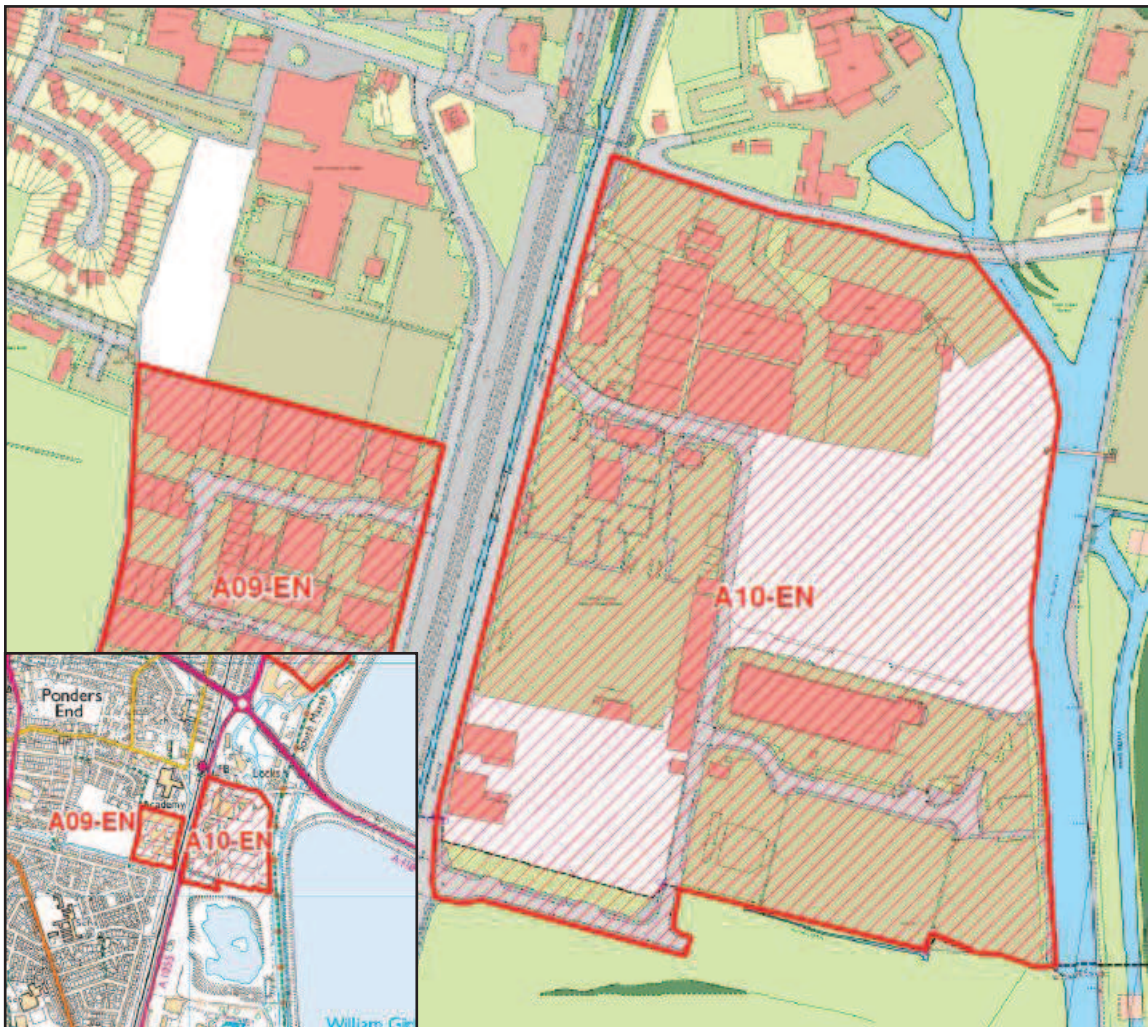
<b>Borough</b>	Enfield
<b>Type of Location</b>	Area
<b>Location Reference</b>	A09-EN - Redburn Trading Estate
<b>Size</b>	4.00 ha
<b>Area Description</b>	Industrial Estate with moderate size units
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Waste transfer, processing and recycling

<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.
<b>Sustainability Appraisal</b>	Band C – Development possible but significant planning issues requiring mitigation.
<b>Flood Risk Zone</b>	<p>The south western corner and southern boundary of site are within Flood Zone 3 (high potential of flooding). The remainder of site is Flood Zone 1 (lowest potential of flooding)</p> <p>As part of the area lies within Flood Zone 3 it is not suitable for the handling of Hazardous Waste.</p>
<b>Key Issues</b>	The site entry and egress is via the same roads and as such may not be an ideal location for large numbers of waste carrying vehicles. However, there are a number of empty units/buildings that would be large enough to house appropriate enclosed waste management facilities. Mitigation would be required to protect the amenity of the adjacent school and open space.
<b>Habitat Regulation Assessment</b>	Site currently being screened



**A10-EN - Meridian Business Park, Enfield**

1:4,100 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)



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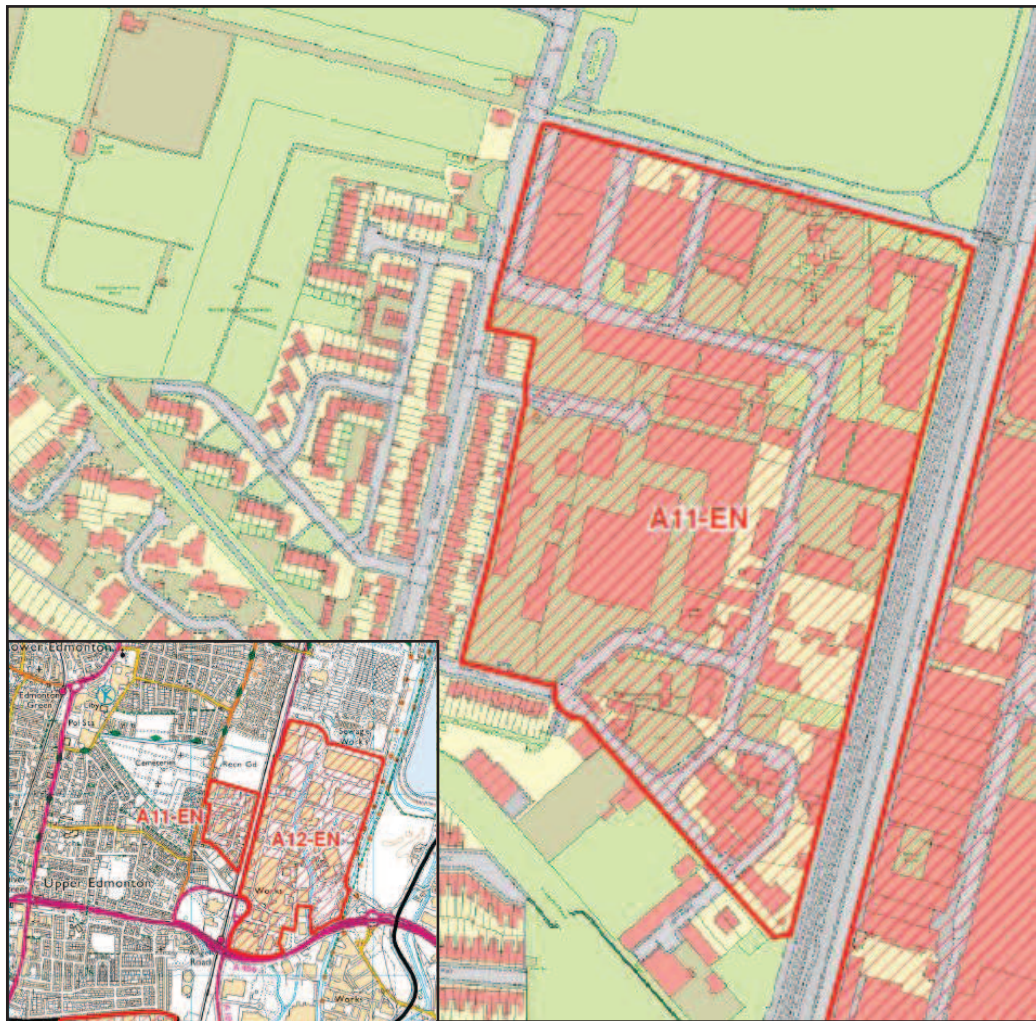
<b>Borough</b>	Enfield
<b>Type of Location</b>	Area
<b>Location Reference</b>	A10-EN - Meridian Business Park
<b>Size</b>	14.90 ha
<b>Area Description</b>	The Business Park lies in the east of Enfield and contains warehouse and industrial units. River Lee Navigation lies adjacent to the east of site with William Girling Reservoir (a SSSI) beyond. The land to the north east and south of site is designated as green belt.

<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Integrated resource recovery facilities/resource parks, Waste transfer, processing and recycling, Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, indoor composting and in-vessel composting.
<b>Uses unlikely to be suitable</b>	Outdoor composting
<b>Sustainability Appraisal</b>	Band B – Several issues requiring mitigation however, generally suitable for development.
<b>Flood Risk Zone</b>	The south west and western boundaries are within Flood Zone 2 (medium probability of flooding)
<b>Key Issues</b>	There was approximately 3ha of unused land at the site at the time of the assessment. Access to the strategic highway network is considered acceptable. Any facility on the site would need mitigation measures to protect the River Lee Navigation and surrounding green belt and SSSI.
<b>Habitat Regulation Assessment</b>	Site currently being screened



**A11-EN - Montagu Industrial Area, Enfield**

**1:4,150 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)**



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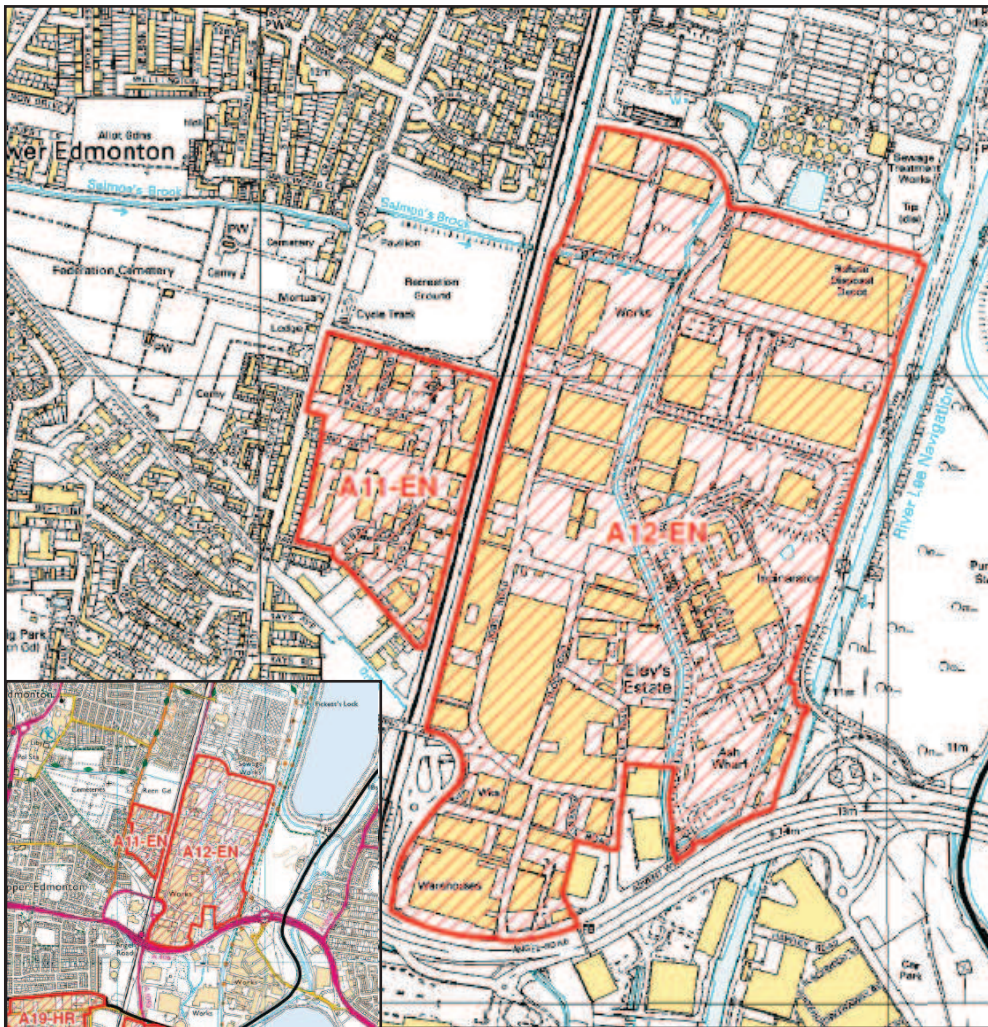
<b>Borough</b>	Enfield
<b>Types of Location</b>	Area
<b>Location Reference</b>	A11-EN - Montagu Industrial Area
<b>Size</b>	9.50 ha
<b>Area Description</b>	The site is occupied with industrial and commercial units. Green open space lies north, industrial and commercial properties lie to the east and residential properties lie to the south and west.

<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Integrated resource recovery facilities/resource parks, Waste transfer, indoor composting, in-vessel composting, processing and recycling
<b>Uses unlikely to be suitable</b>	Thermal treatment, anaerobic digestion, outdoor composting, pyrolysis / gasification and mechanical biological treatment.
<b>Sustainability Appraisal</b>	Band C – Development possible but significant planning issues require mitigation.
<b>Flood Risk Zone</b>	The west and north of site are within Flood Zone 2 (medium probability of flooding). The remainder of site is Flood Zone 1 (lowest probability of flooding)
<b>Key Issues</b>	This site is already occupied by a number of waste management facilities and there is potential for a number of waste management options to be taken forward. The north of the site is a recreational ground and waste management facilities should avoid the units fronting Pegamoid Road to avoid any adverse impact on any sensitive receptors. Similarly there is housing development along the eastern boundary.
<b>Habitat Regulation Assessment</b>	Site currently being screened



**A12-EN – Ely’s Estate, Enfield**

**1:10,700 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)**

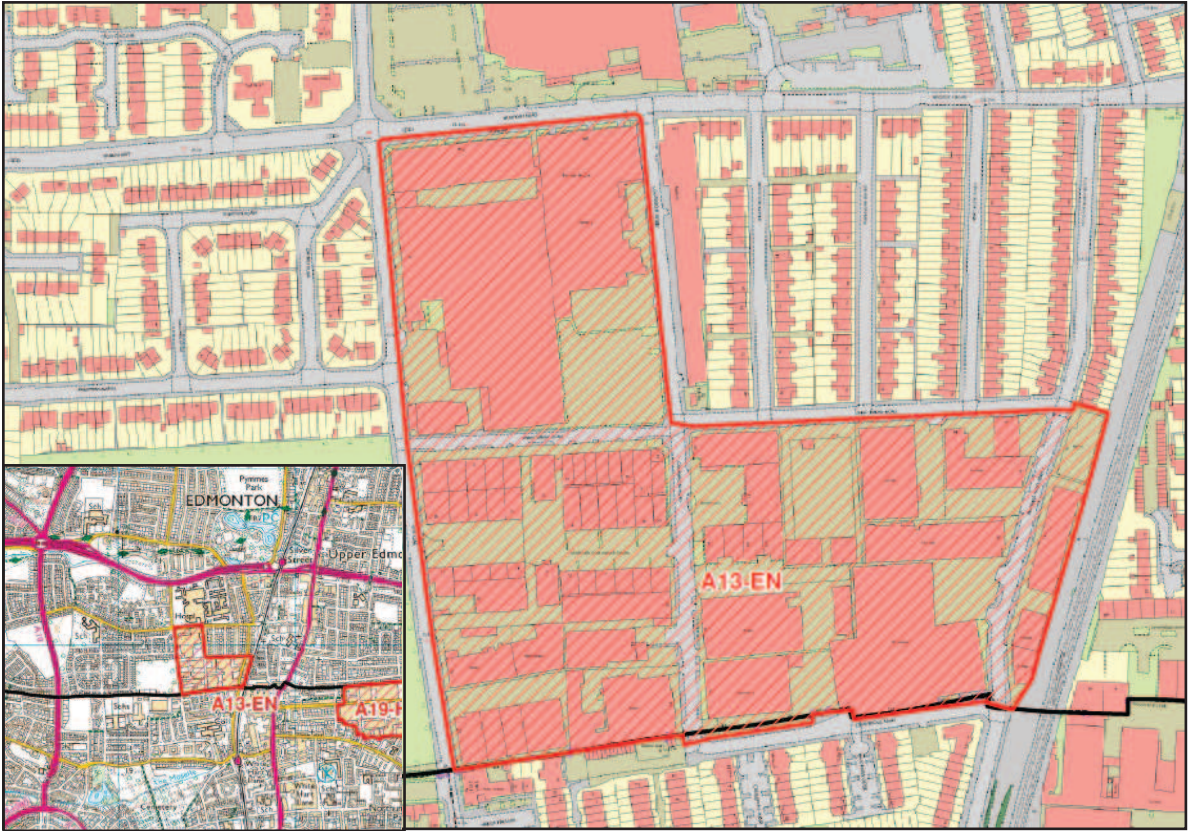


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<b>Borough</b>	Enfield
<b>Type of Location</b>	Area
<b>Location Reference</b>	A12-EN – Eley’s Estate
<b>Size</b>	61.60 ha
<b>Area Description</b>	Industrial areas incorporating Eleys Estate, Edmonton Eco Park and Aztec A406 Industrial Estate. The site is bordered by sewage works in the north, Lee navigation and open ground (green belt and Lee Valley Regional Park) to the east, Meridian Water Development to the south and industrial, commercial, residential and recreational ground to the west.

<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	<p><b>Within Flood Zone 2</b></p> <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> <p><b>Within Flood Zone 3</b></p> <p>Waste transfer and processing and recycling</p>
<b>Uses unlikely to be suitable</b>	Outdoor composting
<b>Sustainability Appraisal</b>	Band B – Several issues requiring mitigation however, generally suitable for development.
<b>Flood Risk Zone</b>	<p>The majority of site is covered by Flood Zone 2 (medium probability of flooding) parts are also covered by Flood Zone 3 (highest probability of flooding). Northeast area within Flood Zone 1 (lowest probability of flooding)</p> <p>As part of the area lies within Flood Zone 3 it is not suitable for the handling of Hazardous Waste.</p>
<b>Key Issues</b>	There are potential environmental and amenity issues facing the site such as the close proximity of enclosed industrial uses, the River Lee Navigation, the green belt and Lee Valley Regional Park.
<b>Habitat Regulation Assessment</b>	Site currently being screened



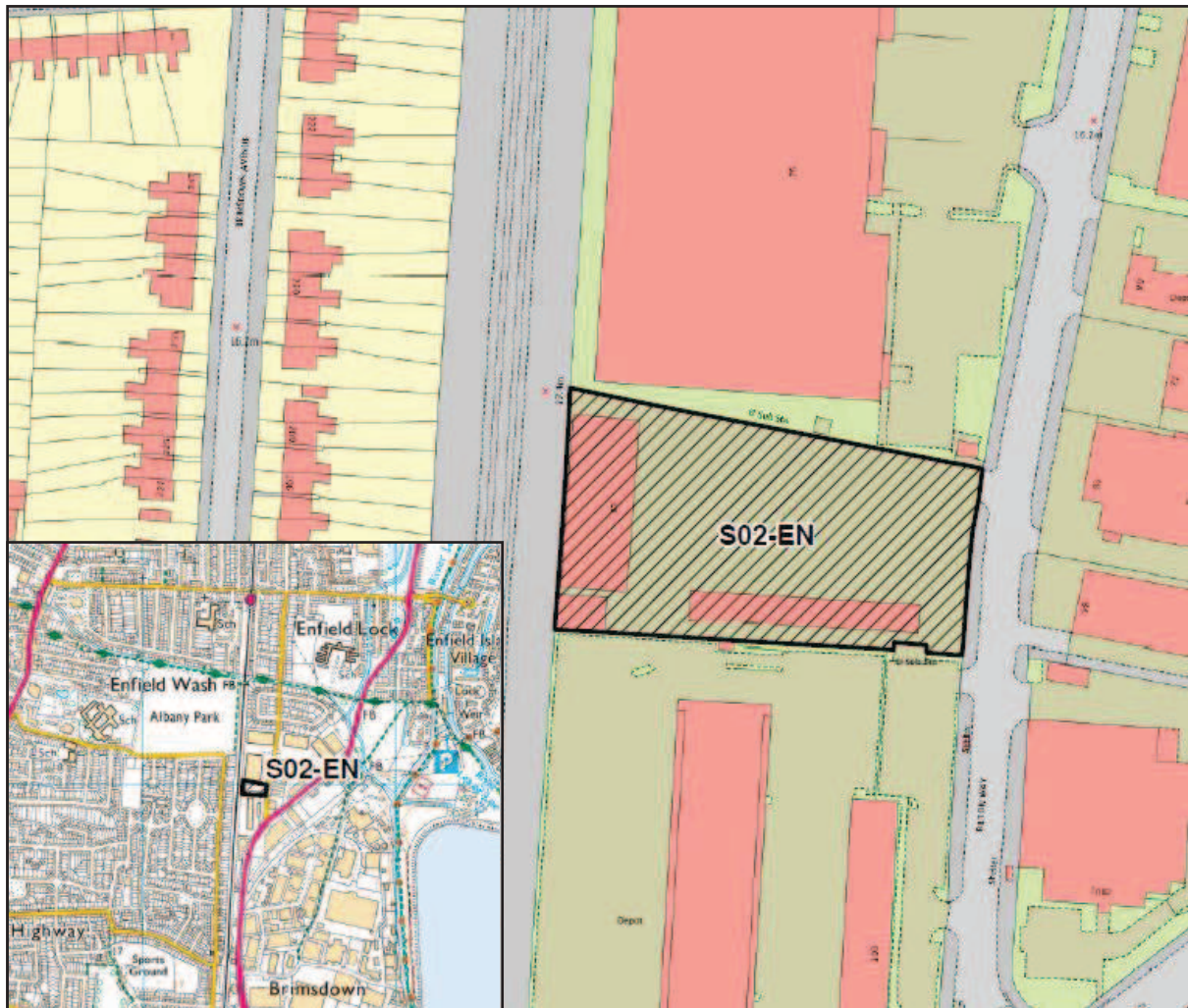
<b>A13-EN - Commercial Road and North Middlesex Estate, Enfield</b>	
<b>1:3,250 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)</b>	
	
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<b>Borough</b>	Enfield
<b>Type of Location</b>	Area
<b>Location Reference</b>	A13-EN - Commercial Road and North Middlesex Estate
<b>Size</b>	10.00 ha
<b>Area Description</b>	Site comprises industrial and commercial units. Residential areas surround the site with a Railway line bordering the east, green open space to the west and North Middlesex University Hospital to the north of site.
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Integrated resource recovery facilities/resource parks, Waste transfer, processing and recycling



<b>Uses unlikely to be suitable</b>	Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.
<b>Sustainability Appraisal</b>	Band C – Development possible but significant planning issues require mitigation.
<b>Flood Risk Zone</b>	Flood Zone 1 (lowest probability of flooding)
<b>Key Issues</b>	There are a number of environmental and amenity issues facing the site such as the close proximity of enclosed industrial uses, housing, North Middlesex Hospital and open parkland.
<b>Habitat Regulation Assessment</b>	Site currently being screened

**S02-EN – Bilton Way, Enfield**

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



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<b>Borough</b>	Enfield
<b>Type of Location</b>	Site
<b>Location Reference</b>	S02-EN – Bilton Way
<b>Size</b>	0.40 ha
<b>Site Description</b>	Occupied by Fraikin Commercial Vehicle Rental (GSV)
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Waste transfer, processing and recycling

<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.
<b>Sustainability Appraisal</b>	Band C – Development possible but significant planning issues require mitigation.
<b>Details of in-situ infrastructure impacting waste development</b>	None identified
<b>Landowner details</b>	Bilton's Enfield Company Limited
<b>Flood Risk Zone</b>	Flood Zone 2 (medium potential of flooding)
<b>Key Issues</b>	The site is small (<0.5ha) and currently in use by Fraikin, a fleet Management Company. The site does however have good access to the strategic highways. Approximately 30m to the west (behind) the site is housing although a railway line acts as a barrier.
<b>Habitat Regulation Assessment</b>	Site currently being screened

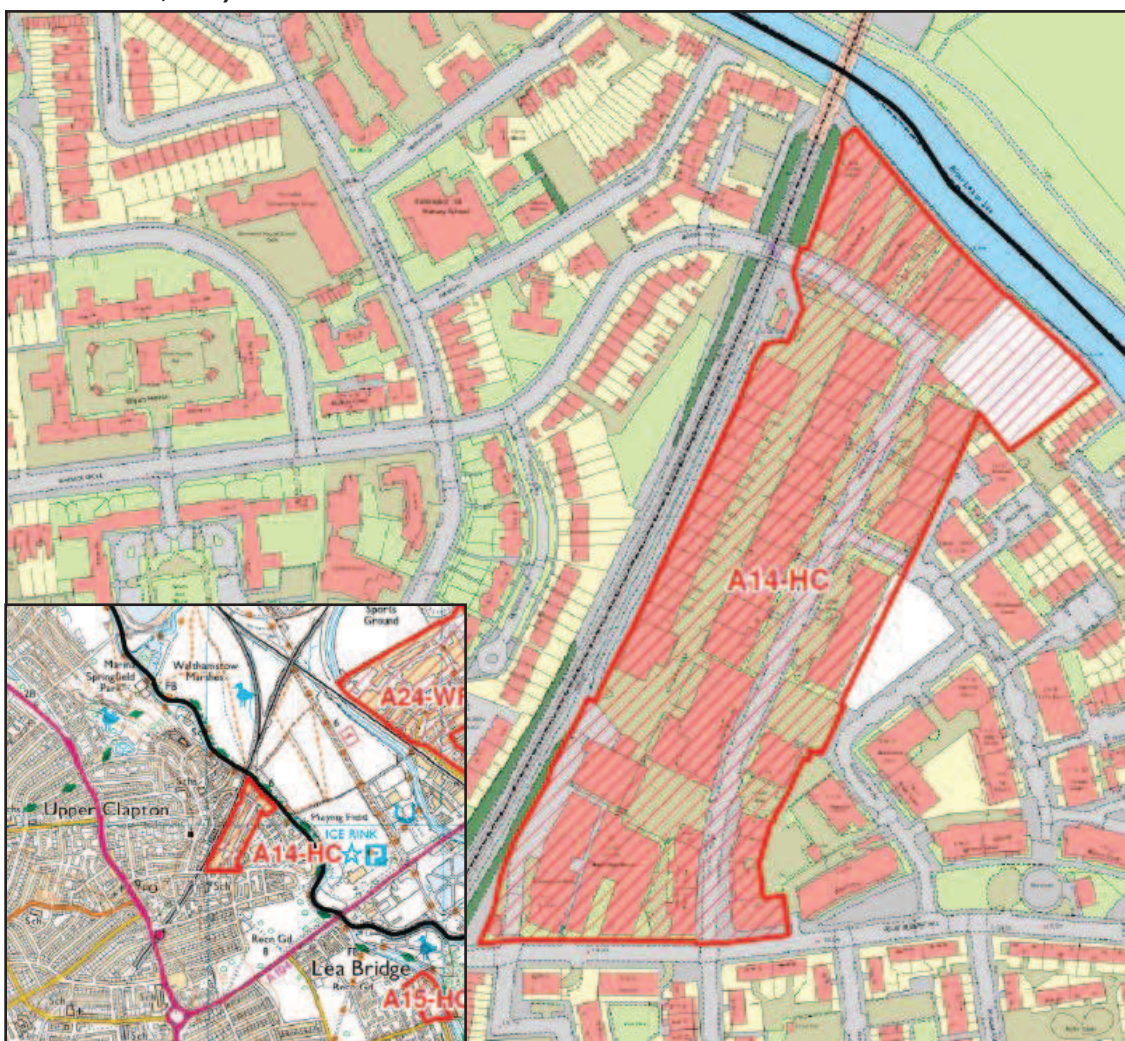
**Hackney Sites and Areas**

A14-HC	Theydon Road (Area)
A15-HC	Millfields LSIS (Area)
A16-HC	Hackney Downs (Area)
A17-HC	Mare Street LSIS (Area)
A18-HC	Oak Wharf, Timberwharf Rd (Area)
S03-EN	Eagle Wharf (Site)



**A14-HC – Theydon Road, Hackney**

**1:3,250 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)**



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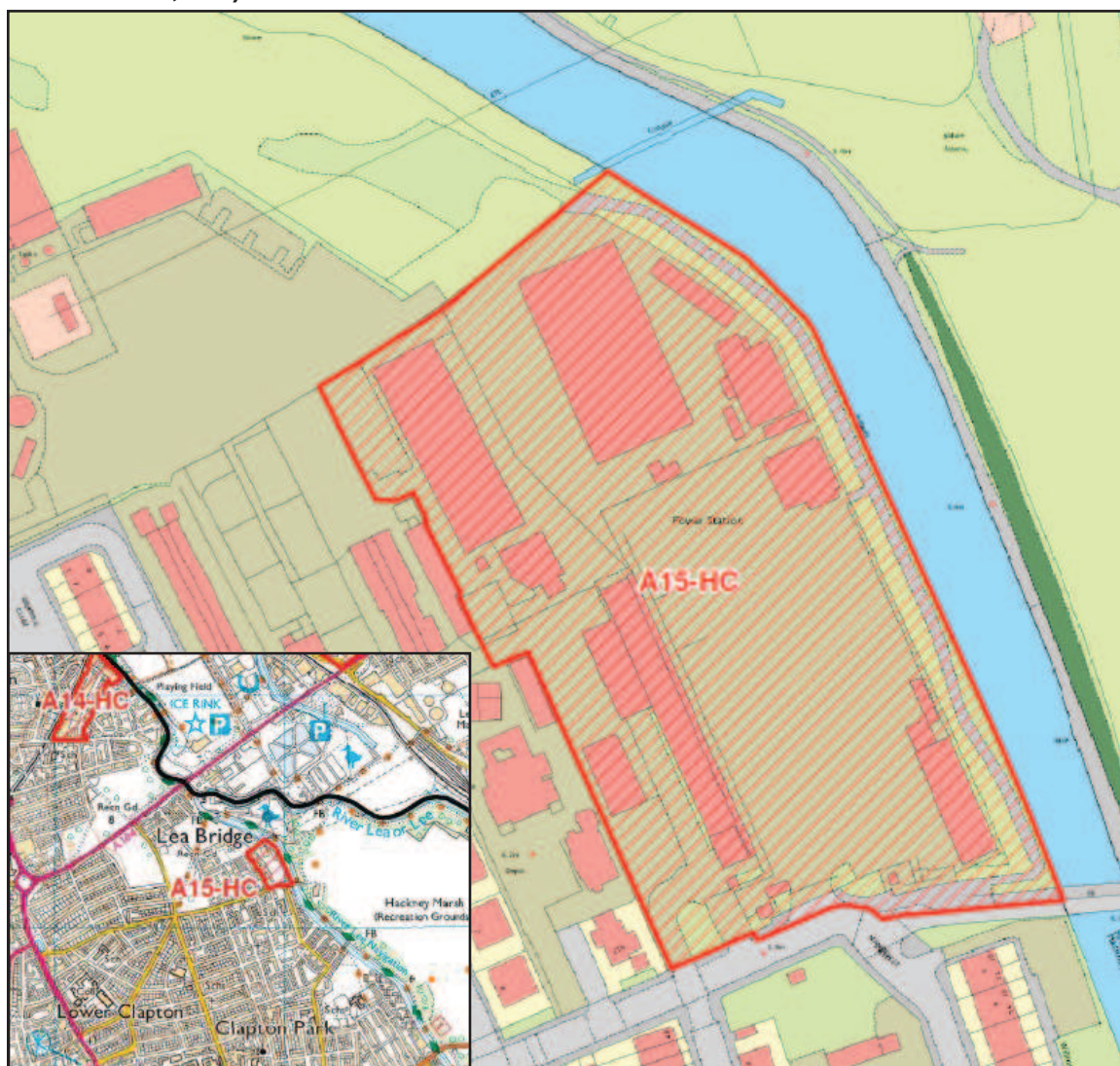
<b>Borough</b>	Hackney
<b>Type of Reference</b>	Area
<b>Location Reference</b>	A14-HC - Theydon Road
<b>Size</b>	4.30 ha
<b>Area Description</b>	Site comprises industrial units and offices. Walthamstow Marshes lie to the north of site whilst residential properties lie east, south and west of site.
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Waste transfer, processing and recycling

<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.
<b>Sustainability Appraisal</b>	Band C – Development possible but significant planning issues require mitigation.
<b>Flood Risk Zone</b>	Northern edge of site within Flood Zone 2 (medium potential of flooding) remainder Flood Zone 1 (lowest potential of flooding)
<b>Key Issues</b>	There are a number of environmental and amenity issues facing the site such as the close proximity of enclosed industrial units and offices, housing and the River Lea to the north.
<b>Habitat Regulation Assessment</b>	Site currently being screened



**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)**



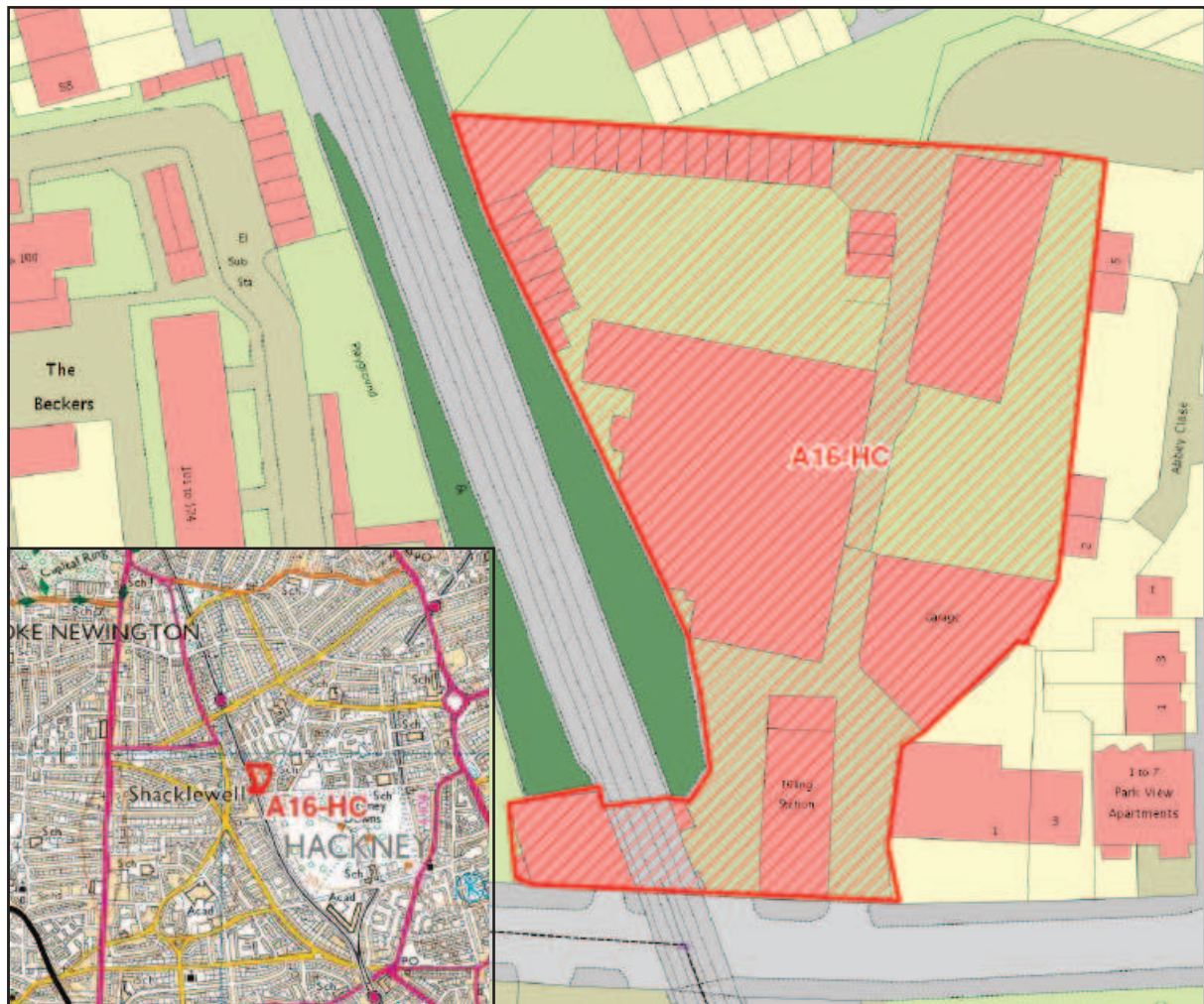
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<b>Borough</b>	Hackney
<b>Type of Location</b>	Area
<b>Location Reference</b>	A15-HC – Millfields LSIS
<b>Size</b>	2.19 ha
<b>Area Description</b>	The area is occupied by a Hackney Council Waste Transfer Station and Fleet Depot and a Power Station. It is bordered by a nature reserve in the north, Hackney Marsh to the east and residential properties south and west.
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	The waste transfer station is operated by Hackney Council whilst the Power Station is privately owned.

<b>Uses unlikely to be suitable</b>	N/A
<b>Sustainability Appraisal</b>	Existing Facility
<b>Flood Risk Zone</b>	Flood Zone 1 (lowest probability of flooding)
<b>Key Issues</b>	The majority of the site is an Active Waste Transfer Station operated by Hackney Council
<b>Habitat Regulation Assessment</b>	Site currently being screened

**A16-HC – Hackney Downs, Hackney**

1:850 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)



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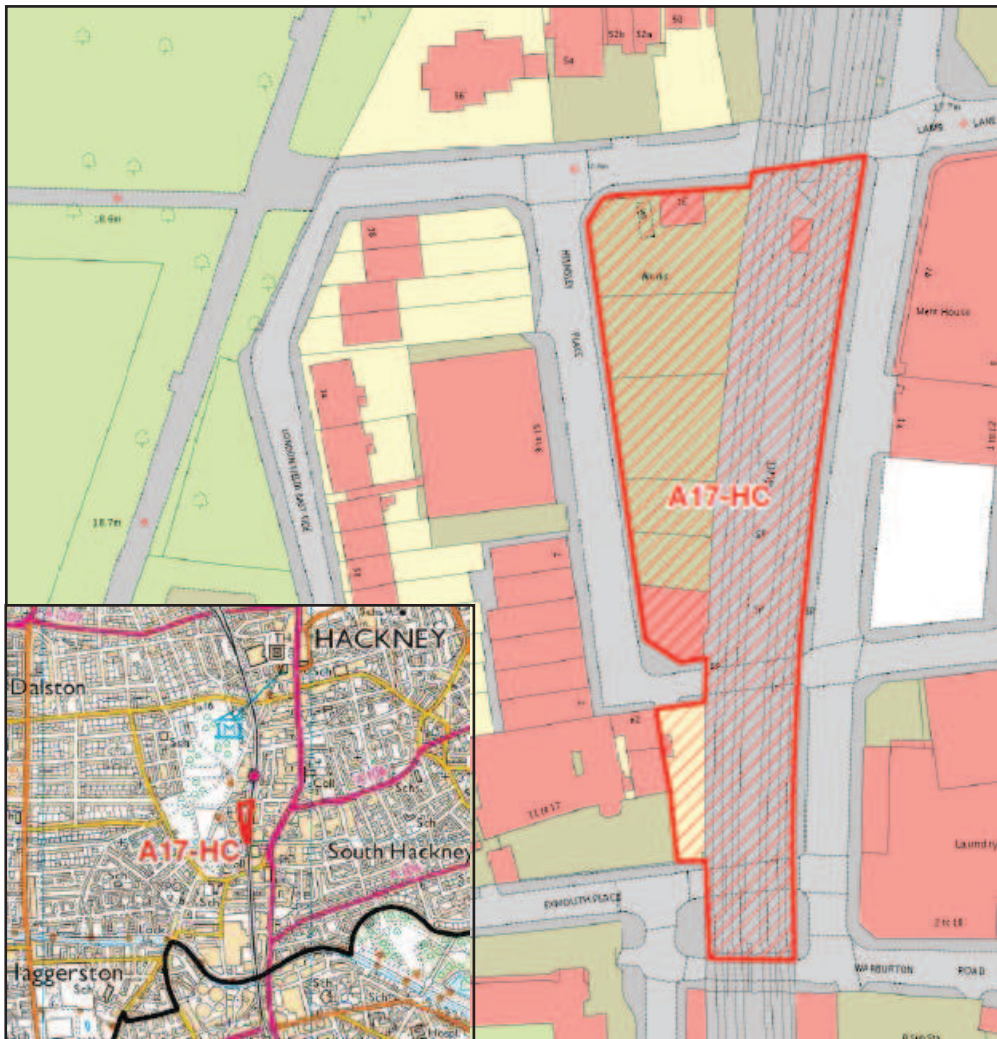
<b>Borough</b>	Hackney
<b>Type of Location</b>	Area
<b>Location Reference</b>	A16-HC – Hackney Downs (north)
<b>Size</b>	0.55 ha
<b>Area Description</b>	The site is split into two areas (northern area shown in plan) by Downs Road which runs east to west through the centre. Both section of site are occupied by Industrial Properties. Residential properties lie north, east, south and west of site. Hackney Downs Park lies approximately 15m east of site
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Processing and recycling

<b>Uses unlikely to be suitable</b>	Waste transfer, integrated resource recovery facilities/resource parks, Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.
<b>Sustainability Appraisal</b>	Band C – Development in northern area possible as existing facility at site but significant planning issues require mitigation.
<b>Flood Risk Zone</b>	Flood Zone 1 (lowest probability of flooding)
<b>Key Issues</b>	Only the northern part of the area (shown in plan) should be taken forward as a Band C and this is due to the existing vehicle dismantlers.
<b>Habitat Regulation Assessment</b>	Site currently being screened



**A17-HC – Mare Street LSIS, Hackney**

**1:1,250 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)**



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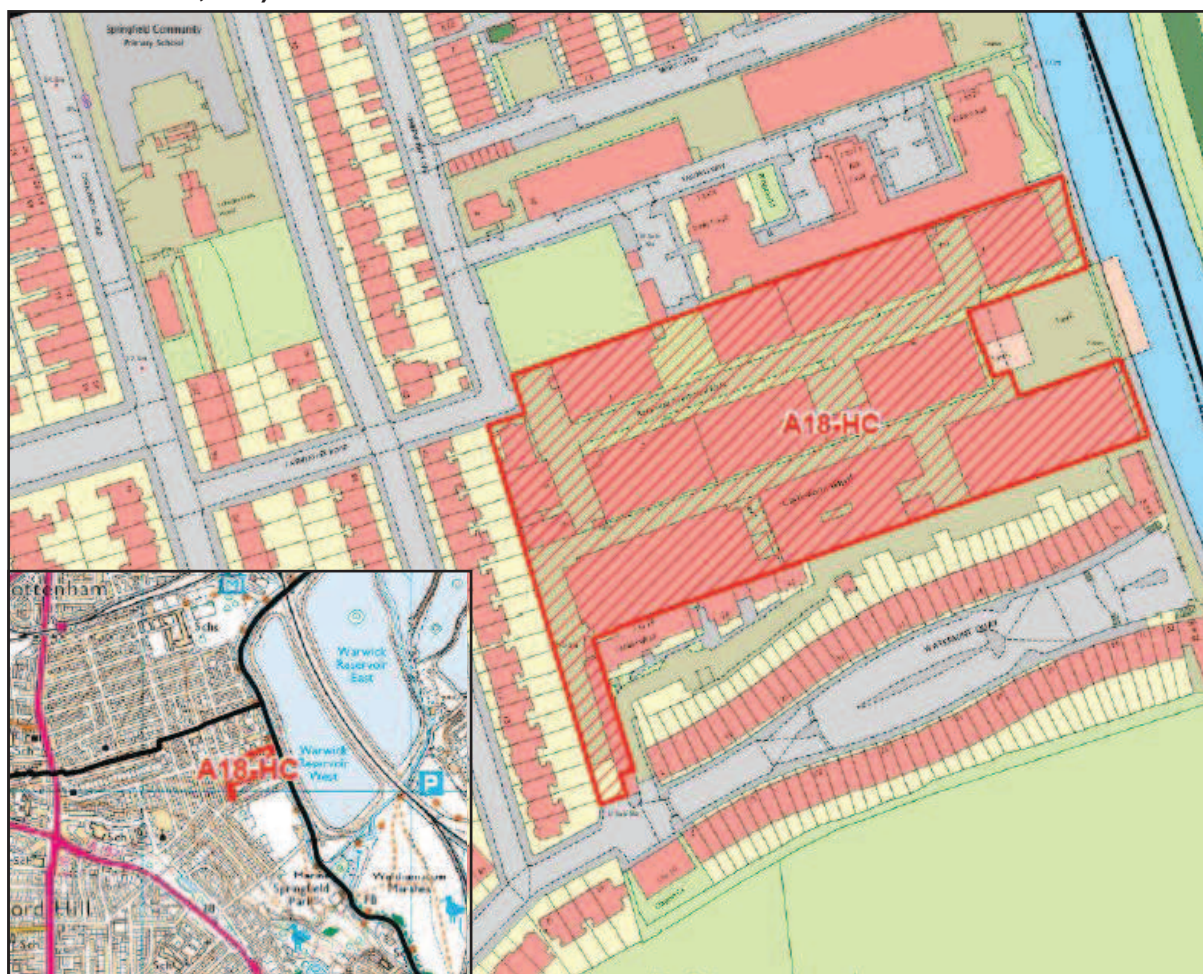
<b>Borough</b>	Hackney
<b>Type of Location</b>	Area
<b>Location Reference</b>	A17-HC – Mare Street LSIS (north)
<b>Size</b>	0.46 ha
<b>Area Description</b>	The site consists of Industrial units. The site is surrounded by industrial units to the north, east and south and playing fields to the west.
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Processing and recycling

<b>Uses unlikely to be suitable</b>	Waste transfer, integrated resource recovery facilities/resource parks, Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.
<b>Sustainability Appraisal</b>	Band C – Development possible due to existing facility at site but significant planning issues require mitigation.
<b>Flood Risk Zone</b>	Flood Zone 1 (lowest probability of flooding)
<b>Key Issues</b>	Only the northern area (shown in plan) should be taken forward because part of the site is an existing scrap metal recycling facility.
<b>Habitat Regulation Assessment</b>	Site currently being screened



**A18-HC – Oak Wharf, Timberwharf Rd, Hackney**

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



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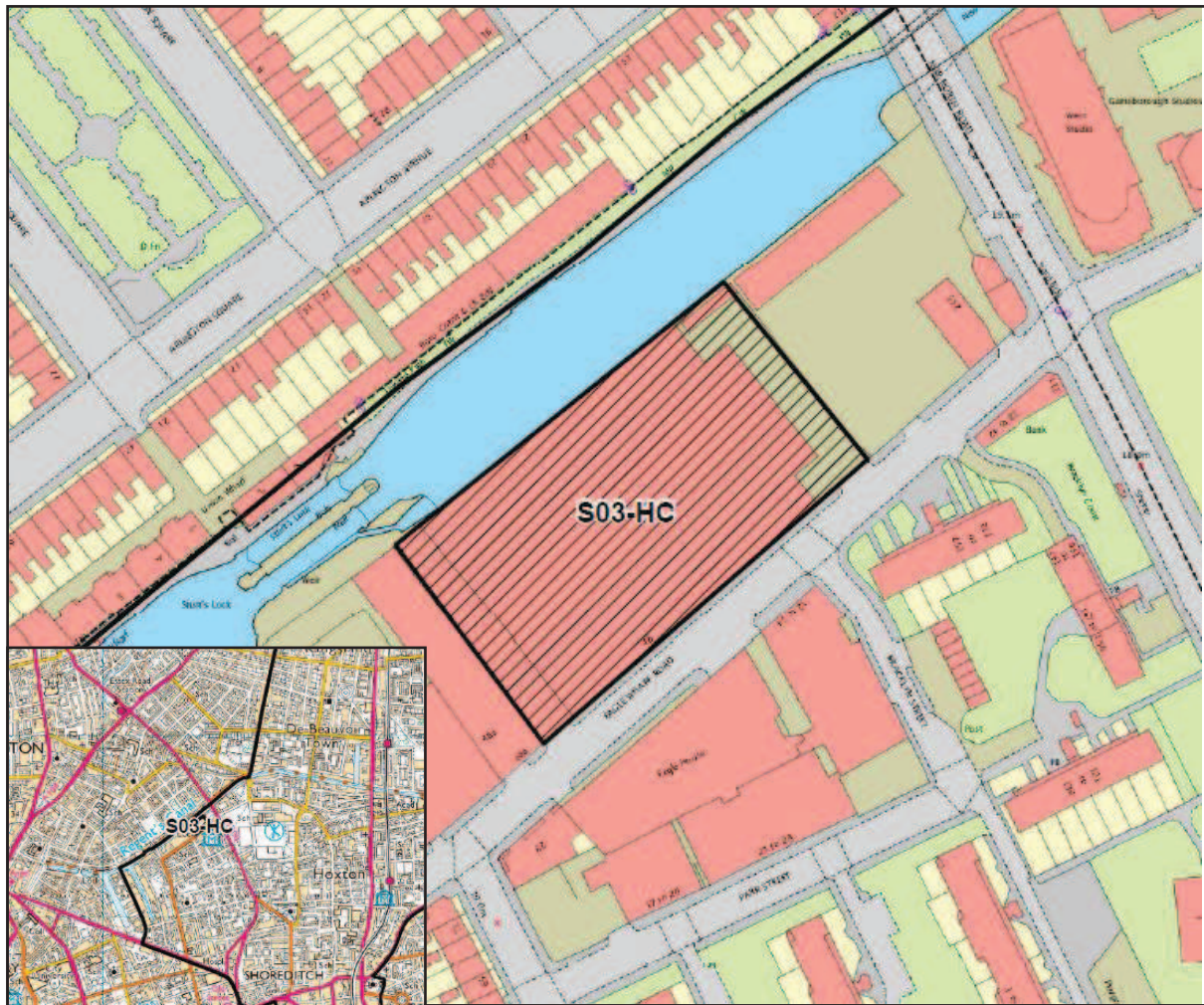
<b>Borough</b>	Hackney
<b>Type of Location</b>	Area
<b>Location Reference</b>	A18-HC – Oak Wharf, Timberwharf Rd
<b>Size</b>	1.58 ha
<b>Area Description</b>	The site is an Industrial Estate. The River Lea flows adjacent to the east of site whilst residential properties border the rest of site, a school lies approximately 50m to the northwest.
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Waste transfer, processing and recycling

<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.
<b>Sustainability Appraisal</b>	Band C – Development possible but significant planning issues require mitigation.
<b>Flood Risk Zone</b>	Eastern edge of site is in Flood Zone 2 (medium probability of flooding) remainder of site is Flood Zone 1 (lowest probability of flooding). The site benefits from flood defences.
<b>Key Issues</b>	Considering the adjacent sensitive receptors, a school and dwellings, then small scale waste management facilities would be the most appropriate option on this industrial site. There is a potential to use the River Lea Navigation to transport waste however, the feasibility is unknown at this time but should be explored at the planning stage.
<b>Habitat Regulation Assessment</b>	Site currently being screened



**S03-HC – Eagle Wharf, Hackney**

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



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<b>Borough</b>	Hackney
<b>Type of Location</b>	Site
<b>Location Reference</b>	S04-HC – Eagle Wharf
<b>Size</b>	0.52 ha
<b>Site Description</b>	The site comprises a warehouse. Site bounded by Regent's Canal to the north, with residential properties beyond. The rest of site is surrounded by industrial and residential properties.
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Waste transfer, processing and recycling

<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.
<b>Sustainability Appraisal</b>	Band C – Development possible but significant planning issues require mitigation.
<b>Details of in-situ infrastructure impacting waste development</b>	Existing building on site will restrict size and layout of any facilities.
<b>Landowner details</b>	The Board of Governors of the Museum of London of PO Box 270, Guildhall, London, EC2P 2EJ
<b>Flood Risk Zone</b>	Flood Zone 1 (lowest probability of flooding)
<b>Key Issues</b>	Access from the canal for the transportation of waste to this site would be viewed as a sustainable transport option but there is also an existing road access on the eastern edge of the site off Eagle Wharf Road. However, although the access is suitable for large vehicles it is one way at this location and traffic would need to access the site via residences. The old warehouse would not be considered suitable for a large facility but would be appropriate for an enclosed small scale waste management facility. Reusing the warehouse in this way would mitigate any impacts on the neighbouring sensitive uses.
<b>Habitat Regulation Assessment</b>	Site currently being screened

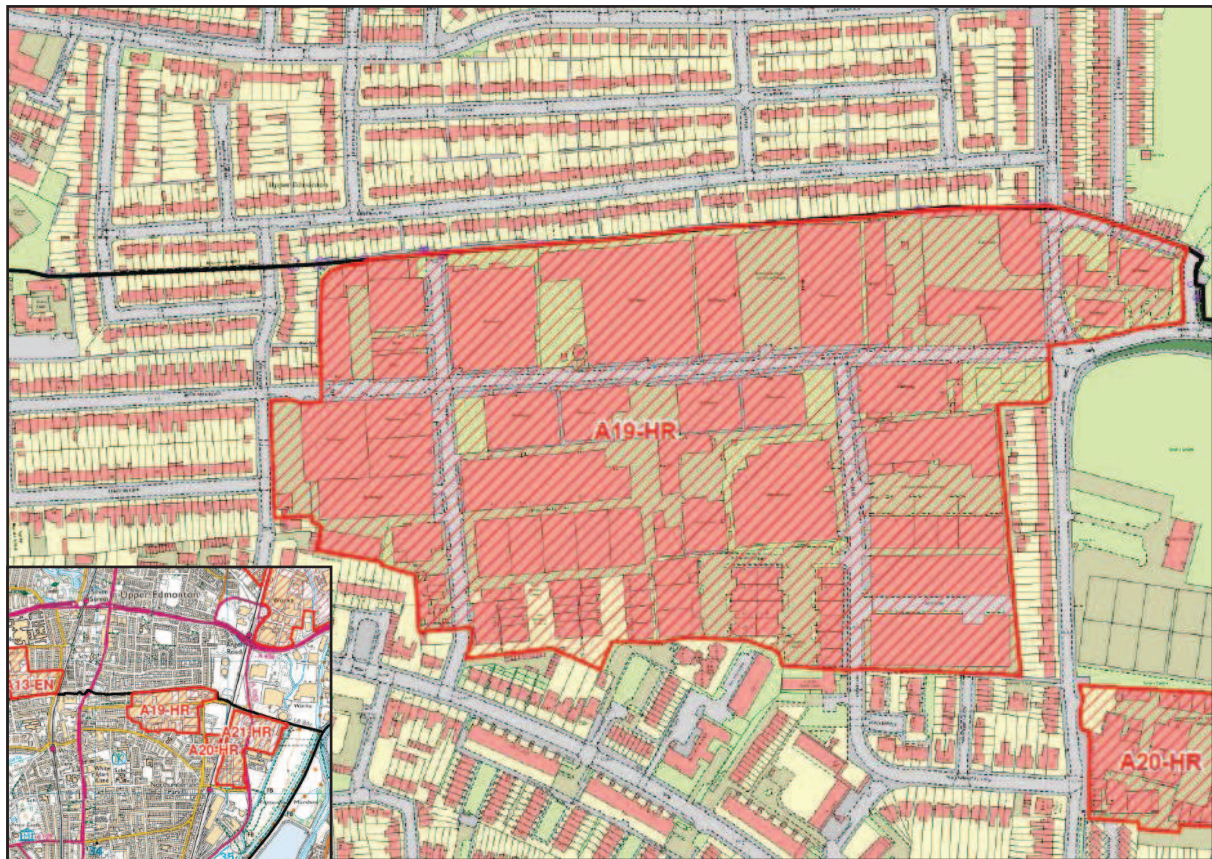
**Haringey Sites and Areas**

A19-HR	Brantwood Road (Area)
A20-HR	Willoughby Lane (Area)
A21-HR	North East Tottenham, Garmen Rd (Area)
A22-HR	Friern Barnet Sewage Works (Area)
A23-HR	Wood Green (Area)



**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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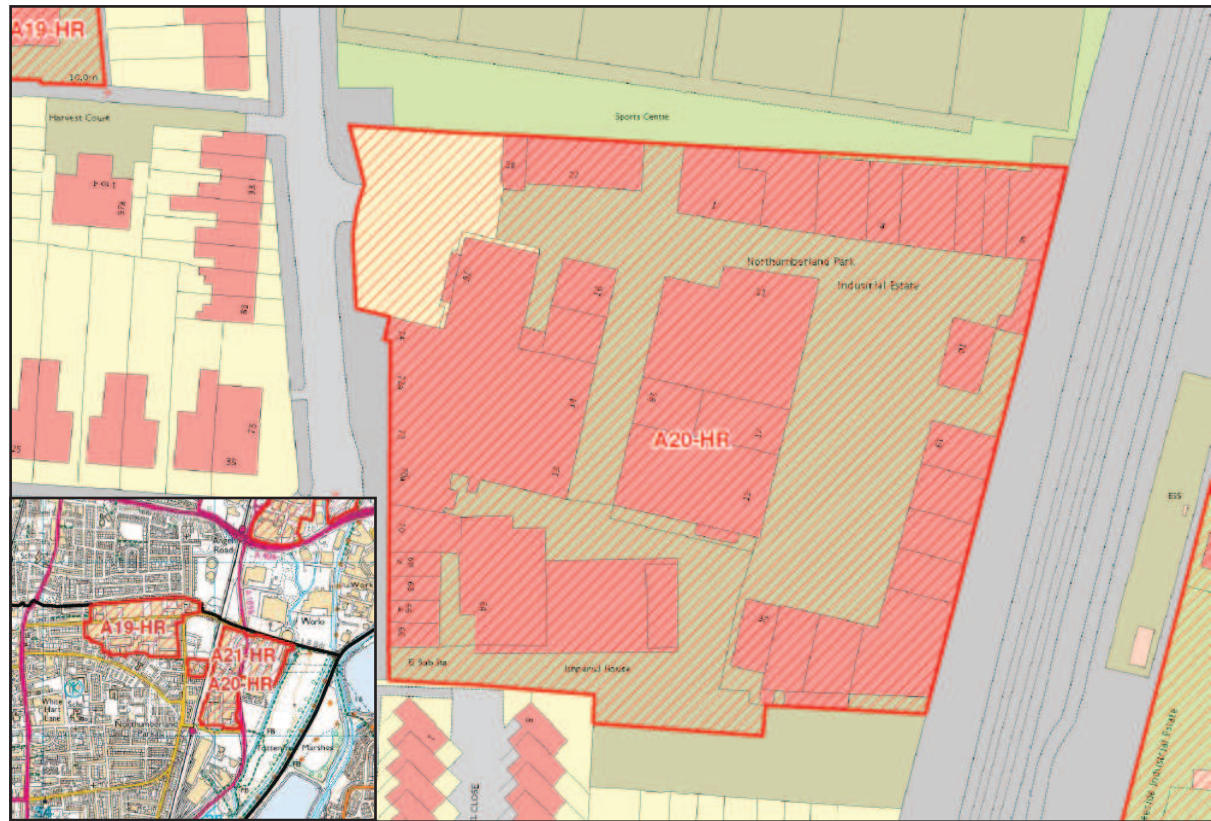
<b>Borough</b>	Haringey
<b>Type of Location</b>	Area
<b>Location Reference</b>	A19-HR – Brantwood Road
<b>Size</b>	16.90 ha
<b>Area Description</b>	Industrial Estate surrounded by mainly residential properties, a sports field to the east and industrial uses to the north east.
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, waste transfer, processing and recycling
<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, outdoor composting, indoor composting and in-vessel composting.



<b>Sustainability Appraisal</b>	Band C – Development possible but significant planning issues require mitigation.
<b>Flood Risk Zone</b>	East of site within Flood Zone 2 (medium probability of flooding)
<b>Key Issues</b>	This is a large site but bounded on all sides by housing and a sports ground on the eastern boundary. Waste management facilities would need to be restricted to the centre of the site away from sensitive receptors.
<b>Habitat Regulation Assessment</b>	Site currently being screened

## A20-HR – Willoughby Lane, Haringey

1:900 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)



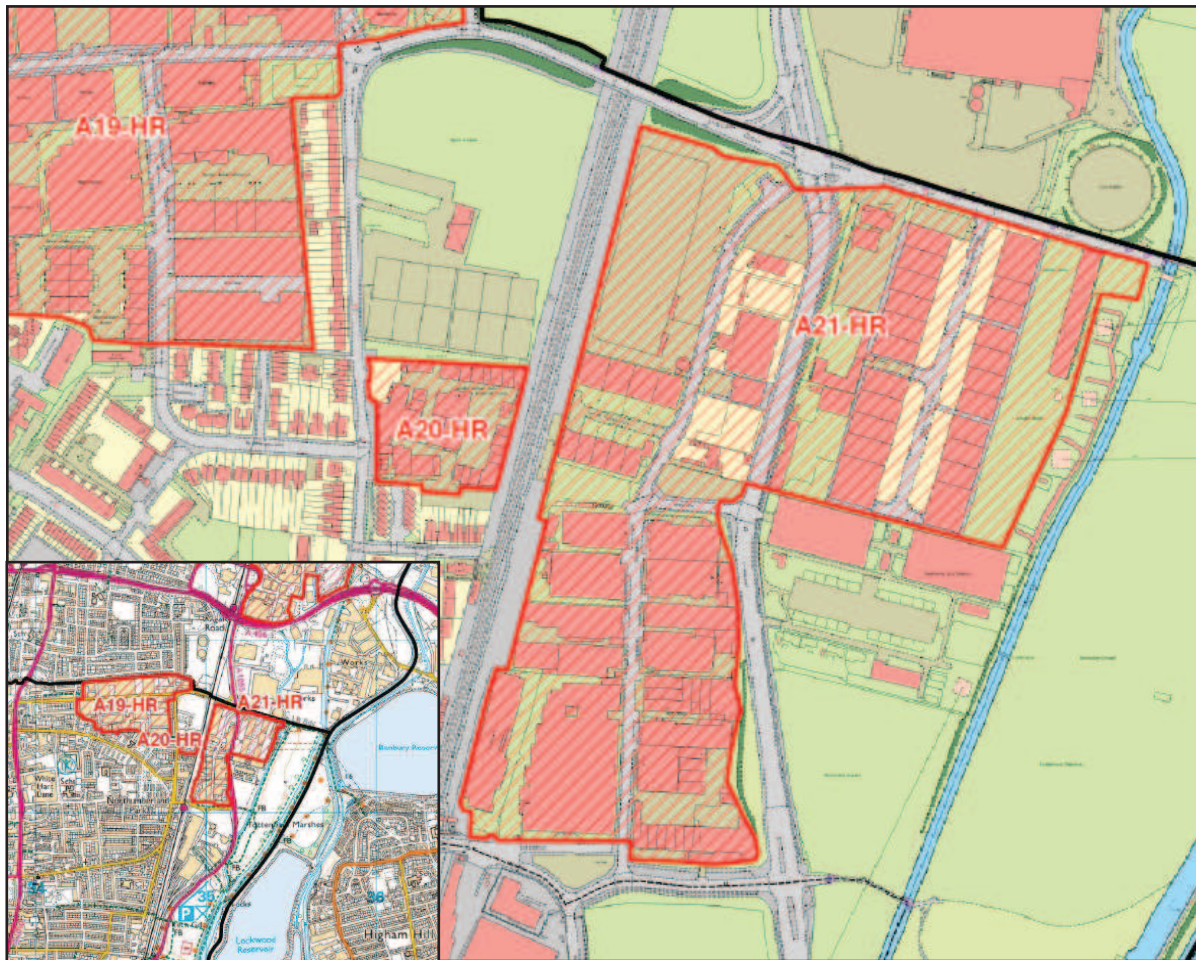
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<b>Borough</b>	Haringey
<b>Type of Location</b>	Area
<b>Location Reference</b>	A20-HR – Willoughby Lane
<b>Size</b>	1.10 ha
<b>Area Description</b>	Site occupied by industrial units and offices. Industrial units lie to the northwest and east, a railway line borders the eastern edge of site, residential properties lie to the south and west and a sports playing field lies to the north of site.
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Waste transfer, processing and recycling
<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.

<b>Sustainability Appraisal</b>	Band C – Development possible but significant planning issues require mitigation.
<b>Flood Risk Zone</b>	Western half of site Flood Zone 2 (medium probability of flooding) eastern half is within Flood Zone 1 (lowest probability of flooding)
<b>Key Issues</b>	This existing industrial unit has reasonable access although it is noted that there are a number of sensitive receptors. However, provided facilities are enclosed and of a small scale it is considered that they would be suitable at this location.
<b>Habitat Regulation Assessment</b>	Site currently being screened

**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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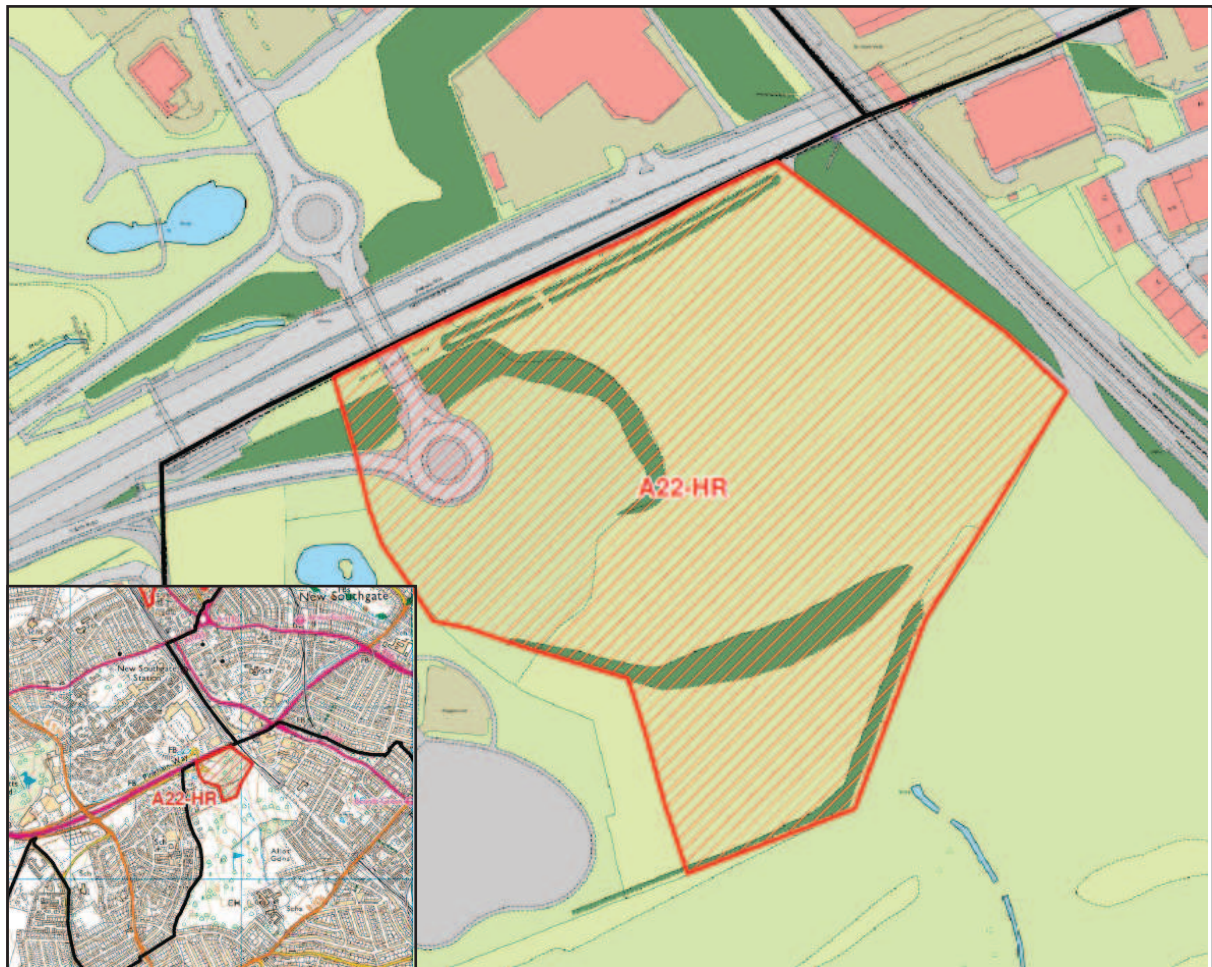
<b>Borough</b>	Haringey
<b>Type of Location</b>	Area
<b>Location Reference</b>	A21-HR – North East Tottenham (SIL 12)
<b>Size</b>	15.40 ha
<b>Area Description</b>	Warehouses and Industrial units on site. Further industrial use and some residential properties to the west. To the east is an area of green open space and the western part of the site is bounded by a railway line with a train station to the south. There are also allotments to the south and an Ikea to the north.



<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, waste transfer, processing and recycling
<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, outdoor composting, indoor composting and in-vessel composting.
<b>Sustainability Appraisal</b>	Band C – Development possible but significant planning issues require mitigation.
<b>Flood Risk Zone</b>	The majority of site is within Flood Zone 2 (medium probability of flooding)
<b>Key Issues</b>	This is a large (15ha) site and is set within a larger commercial/industrial area. The railway line to the west of the site acts as a buffer to residents further to the west and there is some recreational ground to the east. Running along the western boundary of part of the site is Pymmes Brook another sensitive receptor. However, the site is of sufficient size to accommodate a number of waste management facilities without compromising the amenity of these sensitive receptors.
<b>Habitat Regulation Assessment</b>	Site currently being screened

**A22-HR – Friern Barnet Sewage Works (LEA 4), Haringey**

1:2,650 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)



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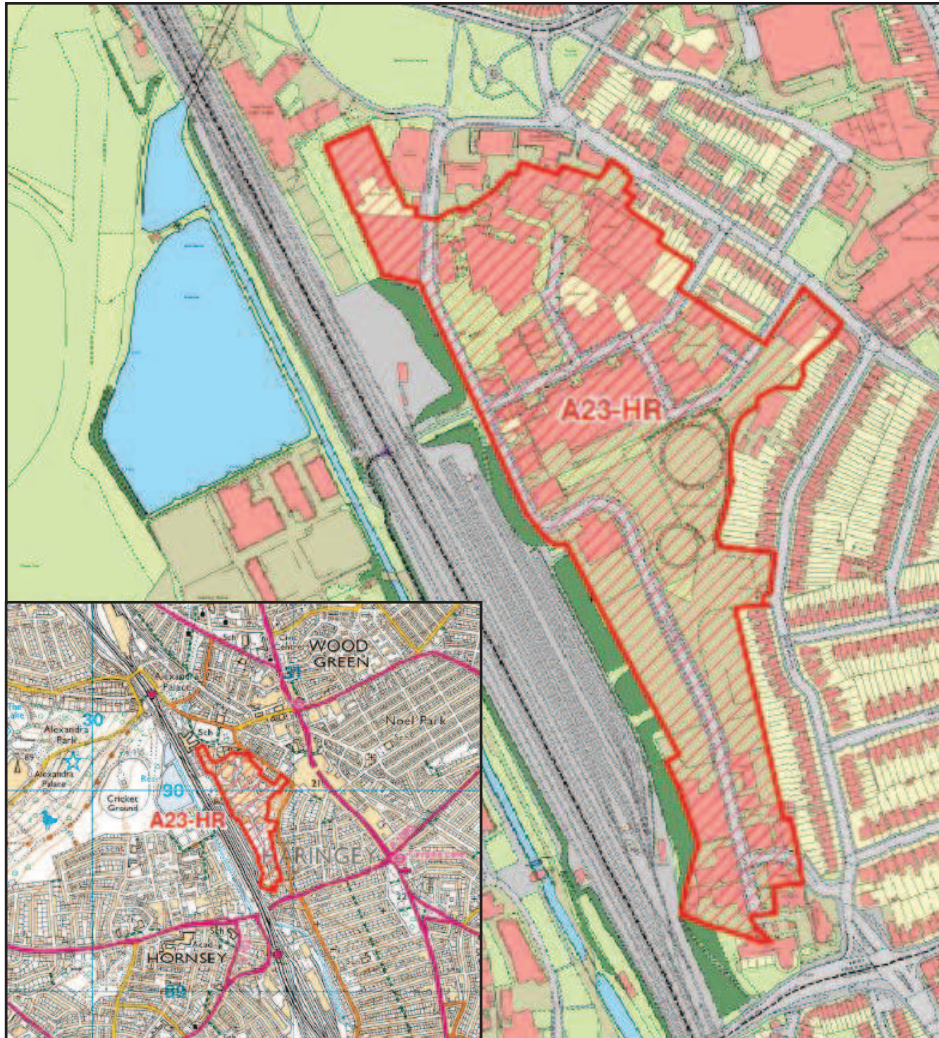
<b>Borough</b>	Haringey
<b>Type of Location</b>	Area
<b>Location Reference</b>	A22-HR – Friern Barnet Sewage Works (LEA 4)
<b>Size</b>	5.93 ha
<b>Area Description</b>	Land is currently unused and has become overgrown with trees and vegetation. Pinkham Way and retail park to the north, industrial properties east, Golf Course south and a park and residential properties to the west.
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Waste transfer, processing and recycling, indoor composting and in-vessel composting.



<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment and outdoor composting.
<b>Sustainability Appraisal</b>	Band B – Several issues requiring mitigation however, generally suitable for development.
<b>Flood Risk Zone</b>	Flood Zone 1 (lowest probability of flooding)
<b>Key Issues</b>	<p>Metropolitan Open Land lies adjacent and a Borough SINC covers the majority of the area. Hackney's Site Specific Proposal 5 requires development to be mitigated by improving the nature conservation value of the area. This will probably restrict the amount of site that can be developed.</p> <p>The site benefits from good access to the primary road network.</p>
<b>Habitat Regulation Assessment</b>	Site currently being screened

**A23-HR – Wood Green (LEA 19), Haringey**

1:5,950 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)



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<b>Borough</b>	Haringey
<b>Type of Location</b>	Area
<b>Location Reference</b>	A23-HR – Wood Green (LEA 19)
<b>Size</b>	11.50 ha
<b>Area Description</b>	Industrial units on site. A railway line lies on the western boundary of site. Mainly residential surrounding the rest of the site. Small area of green open space to the north and a shopping mall to the north east of site.

<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, waste transfer, processing and recycling
<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, outdoor composting, indoor composting and in-vessel composting.
<b>Sustainability Appraisal</b>	Band C – Development possible but significant planning issues require mitigation.
<b>Flood Risk Zone</b>	Flood Zone 1 (medium probability of flooding)
<b>Key Issues</b>	<p>Mitigation measures are likely to be required to ensure that potential adverse impacts on the amenity of those sensitive receptors are alleviated.</p> <p>We also note that there is an outline planning permission from 2012 for residential uses on site. If this planning permission is implemented, depending on the specific proposals, it is likely to impact upon the deliverability of the site.</p>
<b>Habitat Regulation Assessment</b>	Site currently being screened

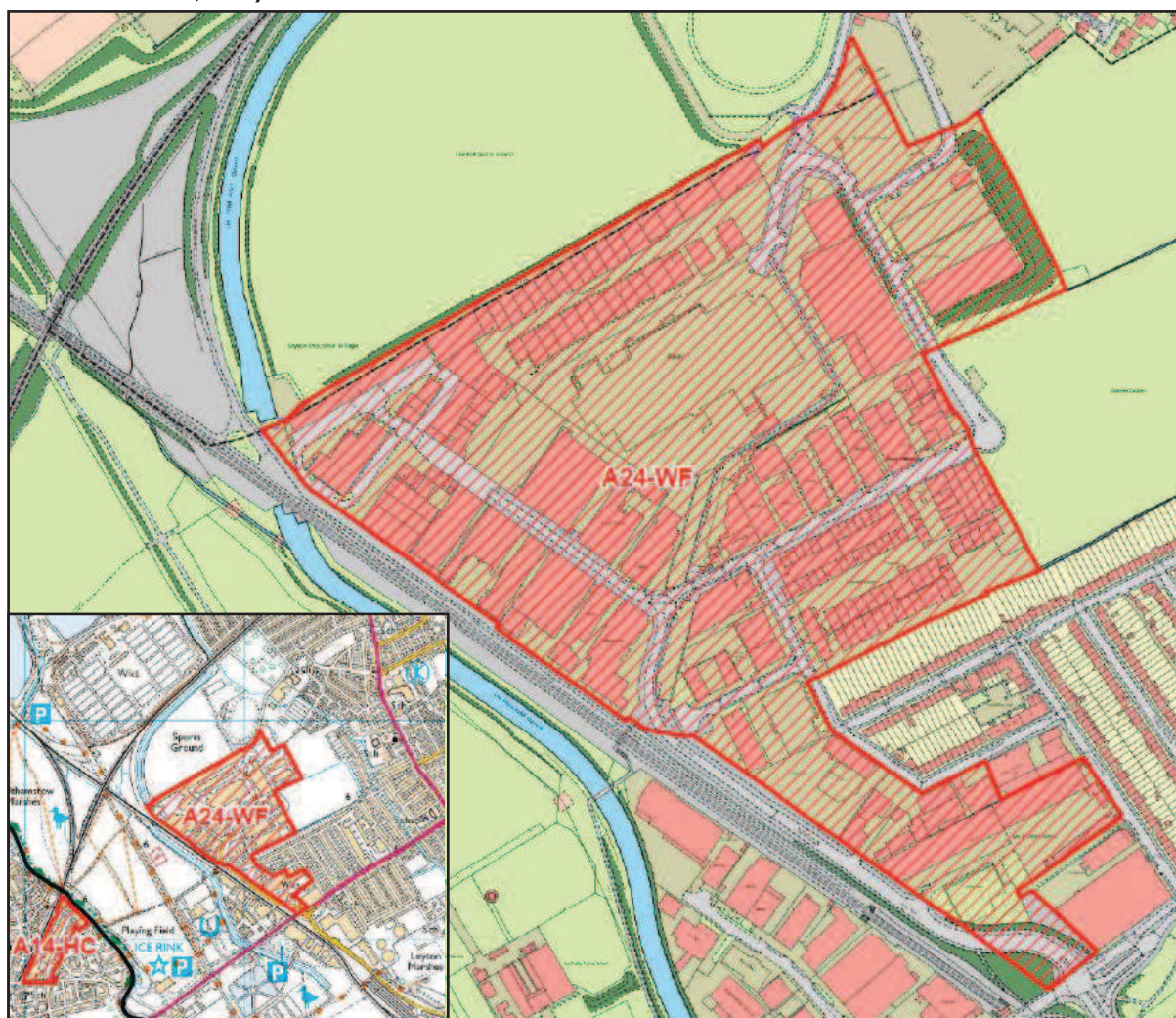
Waltham Forest Sites and Areas

A23-WF	Argall Avenue (Area)
A24-WF	Auckland Road (Area)



**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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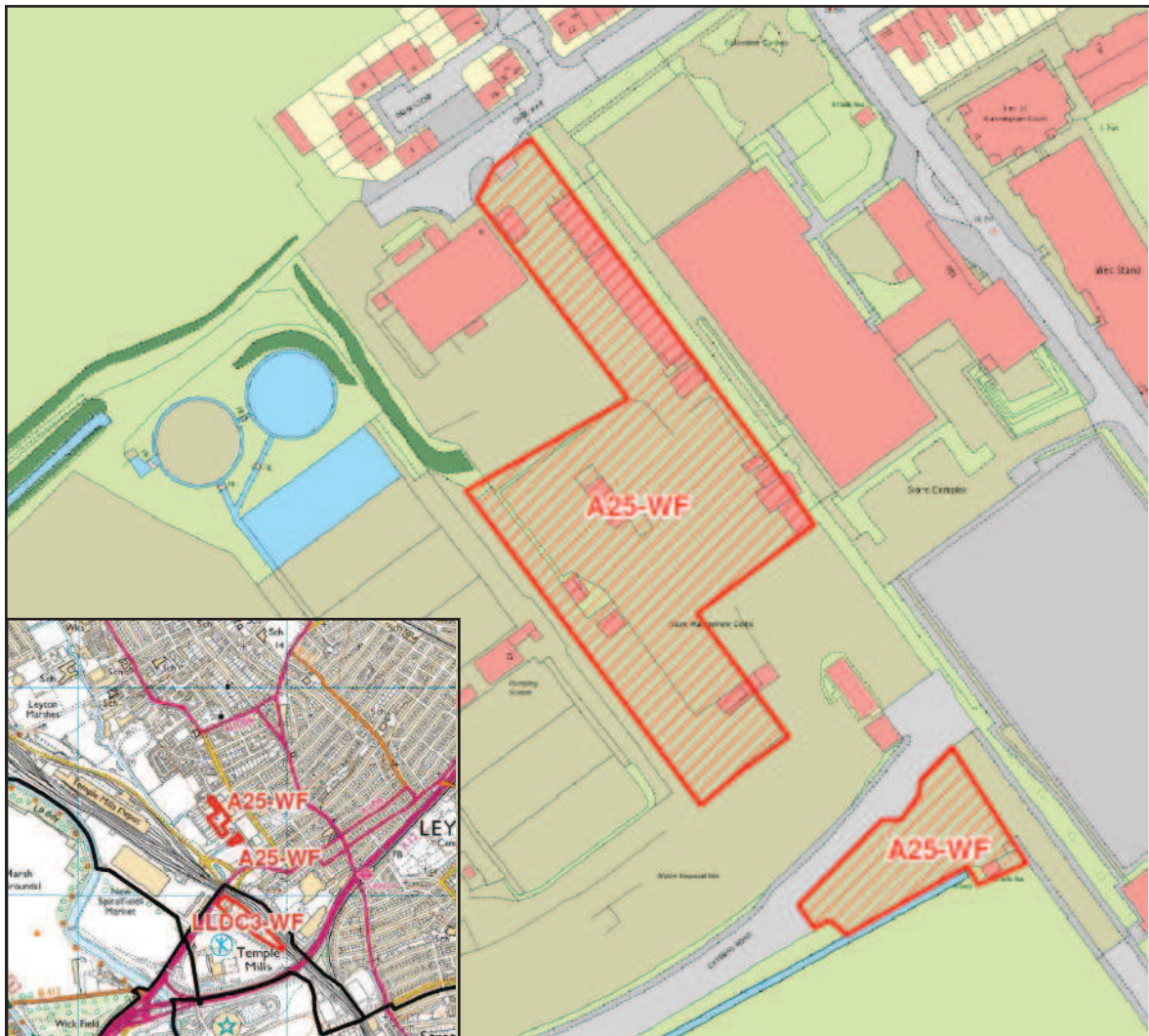
<b>Borough</b>	Waltham Forest
<b>Types of Location</b>	Area
<b>Location Reference</b>	A24-WF – Argall Avenue
<b>Size</b>	26.80 ha
<b>Area Description</b>	The area is an Industrial Estate. There is a sports ground to the north, Lea Valley Park, allotments and residential properties to the east, industrial properties to the south and a railway line to the west of site with open ground beyond.
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Waste transfer, processing and recycling

<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment and outdoor composting, indoor composting, in-vessel composting.
<b>Sustainability Appraisal</b>	Band C – Development possible but significant planning issues require mitigation.
<b>Flood Risk Zone</b>	Majority of site covered by Flood Zone 3 (highest probability of flooding). North of site covered by Flood Zone 2 (medium probability of flooding) As part of the area lies within Flood Zone 3 it is not suitable for the handling of Hazardous Waste.
<b>Key Issues</b>	There are a number of amenity issues with the proximity to housing, allotments and a recreation ground. Due regard will need to be given to nearby sensitive receptors and the high flood risk potential of site.
<b>Habitat Regulation Assessment</b>	Site currently being screened



**A25-WF – Auckland Road, Waltham Forest**

**1:1,950 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)**



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<b>Borough</b>	Waltham Forest
<b>Type of Location</b>	Area
<b>Location Reference</b>	A25-WF – Auckland Road
<b>Size</b>	1.26 ha
<b>Area Description</b>	Existing Household Waste Recycling Facility and Waste Transfer Station within existing industrial estate. There are allotments to north and south, community centre and sports facilities to the east and railway depot to the west of the Industrial estate.
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Waste transfer, processing and recycling

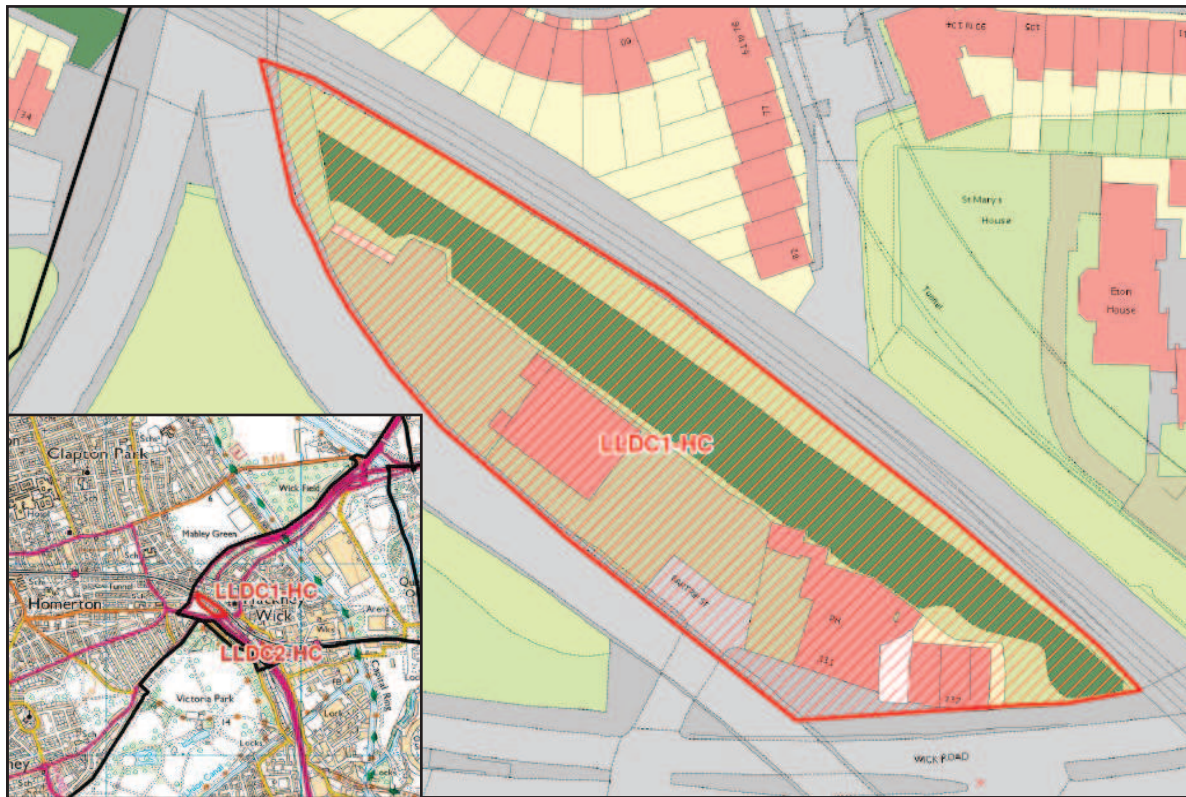
<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.
<b>Sustainability Appraisal</b>	Existing Facilities
<b>Flood Risk Zone</b>	Flood Zone 1 (lowest probability of flooding)
<b>Key Issues</b>	Existing Facilities. Owners, Bywaters, in pre application consultation with Council to redevelop the site.
<b>Habitat Regulation Assessment</b>	Site currently being screened

**London Legacy Development Corporation (LLDC) Sites and Areas**

LLDC1-HC	Bartrip Street LSIS (Area)
LLDC2-HC	Palace Close SIL (Area)
LLDC3-WF	Bus Depot, Temple Mill Lane (Area)

## 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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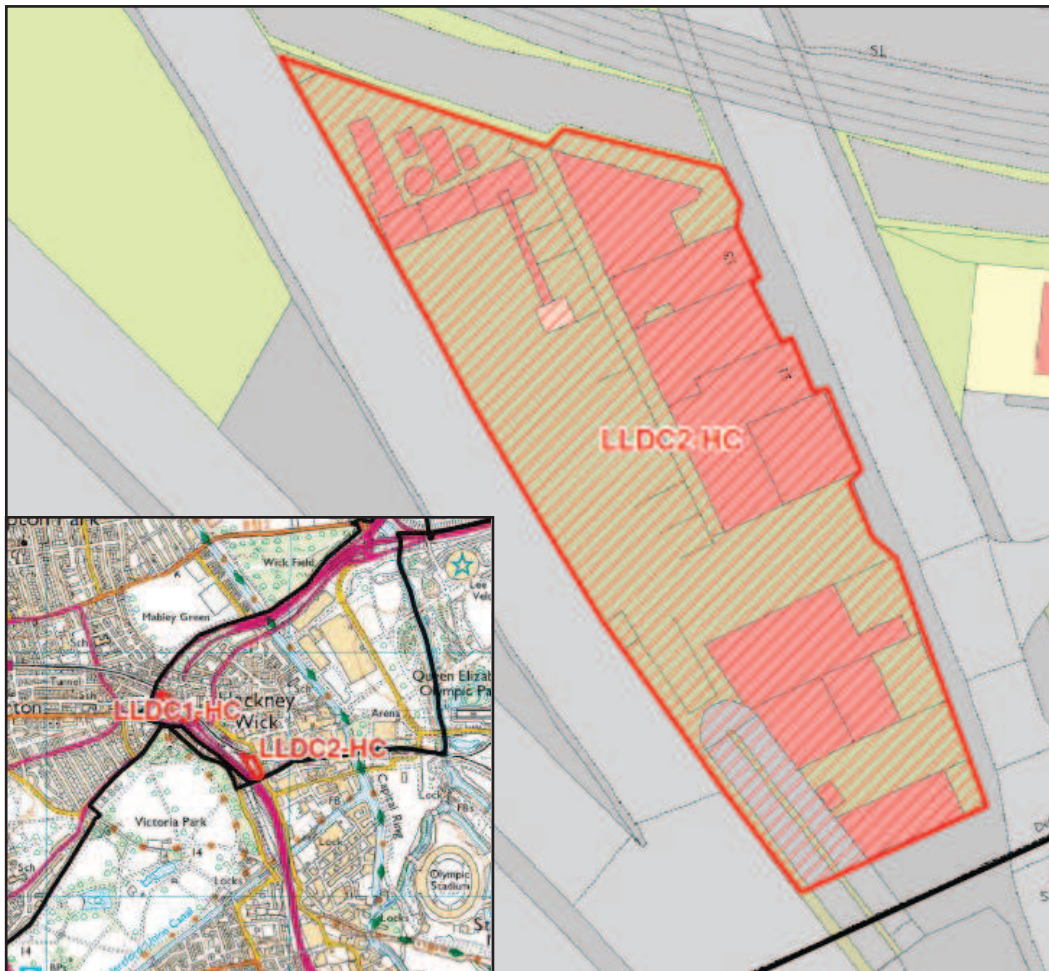
<b>Borough</b>	Hackney
<b>Type of Facility</b>	Site
<b>Location Reference</b>	LLDC1-HC – Bartip Street LSIS
<b>Size</b>	0.60 ha
<b>Site Description</b>	Site contains small scale industrial, storage and distribution uses as well as an abandoned building and lodge in south of site. The site is bounded by road and railway lines on all sides. There is an area of green space to the south west. Residential properties and a church lie in close proximity to the site.
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Waste transfer, processing and recycling
<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.

<b>Sustainability Appraisal</b>	Band C – Development possible but significant planning issues require mitigation.
<b>Details of in-situ infrastructure impacting waste development</b>	Access to site restrictive with poor visibility of the highway when existing.
<b>Landowner details</b>	Currently unknown
<b>Flood Risk Zone</b>	Part covered by Flood Zone 2 (medium probability of flooding)
<b>Key Issues</b>	Although the site is quite small (0.6ha) there is the potential to incorporate a small waste management facility on the commercial vehicle repair yard element of the area. The two redundant buildings may not be suitable in their current form due to size and height constraints.
<b>Habitat Regulation Assessment</b>	Site currently being screened



**LLDC2-HC– 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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<b>Borough</b>	Hackney
<b>Type of Location</b>	Area
<b>Location Reference</b>	LLDC2-HC – Palace Close SIL
<b>Size</b>	0.33 ha (western area)
<b>Area Description</b>	The site is occupied by industrial properties in the west and a permanent gypsy and traveller site in the east. The site is surrounded by industrial uses and a railway line borders the north of site.
<b>Potential Uses as Indicated by the Sustainability Appraisal</b>	Waste transfer, processing and recycling



<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.
<b>Sustainability Appraisal</b>	Band C – Development possible but significant planning issues require mitigation.
<b>Flood Risk Zone</b>	Flood Zone 2 (medium probability of flooding)
<b>Key Issues</b>	Considering the sensitive receptors of Palace Close it is considered that small scale waste management facilities that could make use of the existing buildings would be the most appropriate option on this part of a larger industrial area.
<b>Habitat Regulation Assessment</b>	Site currently being screened

### Appendix 3: Glossary

<b>Term</b>	<b>Acronym</b>	<b>Definition</b>
Air Quality Management Area	AQMA	An area declared by a local authority where it predicts that national air quality objectives will not be met.
Anaerobic Digestion	AD	A process where biodegradable material is encouraged to break down in the absence of oxygen. Material is placed into a closed vessel and in controlled conditions the waste breaks down to produce a mixture of carbon dioxide, methane and solids/liquids known as digestate which can be used for fertiliser, compost or Solid Recovered Fuel (SRF)
Annual Monitoring Report	AMR	A report published by each borough on the effectiveness of policies in the Local Plan to ensure that targets and are being met
Apportionment		Please see 'London Plan Apportionment'.
Area Action Plan	AAP	Type of Development Plan Document focused on a specific location or area which guides development and improvements. It forms one component of the Local Plan.
Biodegradable		Biodegradable materials can be chemically broken down (decomposed) by naturally occurring micro-organisms into simpler compounds.
Brownfield Land		Both land and premises are included in this term, which refers to a site that has previously been used or developed and is not currently fully in use, although it may be partially occupied or utilised. It may also be vacant, derelict or contaminated. This excludes open spaces and land where the remains of previous use have blended into the landscape, or have been overtaken by nature conservation value or amenity use and cannot be regarded as requiring development.
Building Research Establishment Environmental Assessment Method	BREEAM	Standard for assessing the sustainability and environmental performance of buildings.
Civic Amenity Site	CAS	See Recycling and Reuse Centre
Civil Engineering Environmental Quality Assessment and Award	CEEQUAL	Assessment scheme for improving sustainability in civil engineering and public realm projects.

Scheme		
Climate Change		Regional or global-scale changes in historical climate patterns arising from natural and/or man-made causes that produce an increasing mean global surface temperature.
Clinical Waste		Waste arising from medical, nursing, veterinary, pharmaceutical, dental or related practices, where risk of infection may be present.
Combined Heat and Power	CHP	The combined production of heat (usually in the form of steam) and power (usually in the form of electricity). The heat can be used as hot water to serve a district-heating scheme.
Commercial and Industrial Waste	C&I	Waste arising from business and industry. Industrial waste is waste generated by factories and industrial plants. Commercial waste is waste produced from premises used for sport, recreation or entertainment and from traders, catering establishments, shops, offices and other businesses. May include food waste, packaging and old computer equipment.
Composting	-	A biological process which takes place in the presence of oxygen in which organic wastes, such as garden and kitchen waste, are converted into a stable, granular material. This can be applied to land to improve soil structure and enrich the nutrient content of the soil.
Construction Demolition and Excavation Waste	CD&E	Waste arising from the construction, maintenance, repair and demolition of roads, buildings and structures. It is mostly comprised of concrete, brick, stone and soil, but can also include metals, plastics, timber and glass.
Core Strategy		Part of the Local Plan (and a Development Plan Document) which provides a written statement of the core policies for delivering the spatial strategy and vision for a borough, supported by a reasoned justification.
Development Management Document		A set of criteria-based policies in accordance with the Core Strategy, against which planning applications for the development and use of land and buildings will be considered. Also known as Site Development Policies.

Development Plan		The Development Plan for the North London Boroughs comprises the London Plan and borough Local Plans. The NLWP must be in line with the Development Plan through general conformity with the London Plan and consistency with documents in borough Local Plans.
Development Plan Document	DPD	These are statutory local development documents prepared under the Planning and Compulsory Purchase Act 2004, which set out the spatial planning strategy and policies for an area. They have the weight of development plan status and are subject to community involvement, public consultation and independent examination.
Energy from Waste	EfW	The conversion of waste into a useable form of energy, often heat or electricity. EfW is also used to describe some thermal waste treatment plants.
Energy Recovery		The combustion of waste under controlled conditions in which the heat released is recovered to provide hot water and steam (usually) for electricity generation (see also Recovery).
End of Life Vehicle	ELV	Motor vehicles that fall into the category of 'waste' as defined by the EU Waste Directive.
Environment Agency	EA	Agency which regulates waste management activities by issuing waste management licences and other permits and exemptions. The EA also conducts national surveys of waste arising and waste facilities.
Environmental Permit	EP	A permit issued by the Environment Agency to regulate the operation of a waste management activity. Formerly known as a Waste Management Licence.
Examination		Also known as public hearings. Presided over by a Planning Inspector or a Panel of Inspectors appointed by the Secretary of State; this can consist of hearing sessions, or consideration of written representations to consider whether the policies and proposals of the local planning authority's Development Plan Documents are sound.
Further Alterations to the London Plan	FALP	In March 2015, the Mayor published (i.e. adopted) the Further Alterations to the

		London Plan (FALP). From this date, the FALP are operative as formal alterations to the London Plan (the Mayor's spatial development strategy) and form part of the development plan for Greater London.
Gasification		The thermal breakdown of organic material by heating waste in a low oxygen atmosphere to produce a gas. This gas is then used to produce heat/electricity.
Greater London Authority	GLA	The GLA is the strategic citywide government for London. It is made up of a directly elected Mayor – the Mayor of London - and a separately elected Assembly – the London Assembly.
Green Belt		A planning designation to check the unrestricted sprawl of large built-up areas.
Green Waste		Organic waste from households, parks, gardens, wooded and landscaped areas such as tree prunings, grass clippings, leaves etc.
Greenhouse Gas		A gas in the Earth's atmosphere that traps heat and can contribute to global warming. Examples include carbon dioxide and methane.
Gross Value Added	GVA	A measure of the value of the goods and services produced in the economy.
Habitat Regulation Assessment	HRA	This is a requirement of the European Habitats Directive. Its purpose is to assess the impacts of plans and projects on internationally designated sites and nature conservation sites.
Hazardous waste	-	A sub category of all waste streams. Waste that contains potentially damaging properties which may make it harmful to human health or the environment and requires specialist treatment. It includes materials such as asbestos, fluorescent light tubes and lead-acid batteries. The European Commission has issued a Directive on the controlled management of hazardous waste; wastes are defined as hazardous on the basis of a list created under that Directive.
Hectare	ha	Hectare (10,000m <sup>2</sup> of area, which is equivalent to 2.47 acres).
Household Waste		Waste from a private dwelling or residential house or other such specified premises, and includes waste taken to

		household waste recycling centres. Together with Trade Waste known as Local Authority Collected Waste (LACW).
Household Waste Recycling Centre	HWRC	See Recycling and Reuse Centre
In-vessel Composting	IVC	Shredded waste is placed inside a chamber or container through which air is forced. This speeds up the composting process. It is a controlled process and is capable of treating both food and green waste by achieving the required composting temperatures. It is also known as enclosed composting.
Incineration		The burning of waste at high temperatures in the presence of sufficient air to achieve complete combustion, either to reduce its volume (in the case of municipal solid waste) or its toxicity (such as for organic solvents). Incinerators can recover power and/or heat. Incinerators are often referred to as EfW (energy from waste) plants.
Inert waste	-	Inert waste is waste that does not undergo significant physical, chemical or biological changes following disposal and does not adversely affect other matters that it may come into contact with, and does not endanger surface or groundwater.
Integrated resource recovery facilities / resource parks		A multi faceted waste management facility, processing recycling and treatment of waste in one location
Joint Municipal Waste Management Strategy	JMWMS	This sets out how authorities intend to optimise current service provision as well as providing a basis for any new systems or infrastructure that may be needed.
kilo-tonnes per annum	ktpa	A kilo-tonne is 1,000 tonnes
Landfill	-	Restoration of land (for example, a former quarry) using waste to provide land which may be used for another purpose..
Land recovery	-	The restoration of land using inert waste to enable the land to be used for a new purpose.
Local Authority Collected Waste	LACW	Previously known as municipal waste, LACW refers to all waste collected by a Local Authority.
Local Development Scheme	LDS	A document setting out the local planning authority's intentions for its Local Plan; in particular, the documents it intends to produce and the timetable for their production and review.



Local Plan		A portfolio of planning documents that provide the strategic and policy framework for delivering and managing development in an area. ). The NLWP must be in general conformity with the London Plan.
Low level Radioactive Waste	LLW	Radioactive waste having a radioactive content not exceeding four GBq/te of alpha or 12 GBq/te of beta/gamma activity.
The London Plan	-	This is the Spatial Development Strategy for London, produced by the Mayor of London which forms part of the Development Plan for each borough and provides a strategic framework for the boroughs' Local Plans. The London Plan was updated in March 2015 to incorporate the Further Alterations. It also incorporates the Revised Early Minor Alterations to the London Plan (REMA), which were published in October 2013. See also Further Alterations to the London Plan.
London Plan Apportionment		Allocates to each individual borough a proportion of London's total waste (expressed in tonnes) for which sufficient sites for managing and processing waste must be identified within their Local Plans.
Materials Recycling Facility or Materials Recovery Facility	MRF	A special sorting 'factory' where mixed recyclables are separated into individual materials prior to despatch to reprocessors who prepare the materials for manufacturing into new recycled products.
Mechanical Biological Treatment	MBT	A combination of mechanical separation techniques and (either aerobic or anaerobic) biological treatment, or a combination of the two, which are designed to recover value from and/or treat fractions of waste.
Mechanical Heat Treatment	MHT	A combination of mechanical and heating techniques which are designed to sterilise, stabilise and treat waste and recover value from it.
Net self-sufficiency		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.

North London Waste Authority	NLWA	Joint Waste Disposal Authority formed by the London boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest acting as waste collection authorities
North London Waste Plan	NLWP	The North London Waste Plan will set out the planning framework for waste management in the London boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest for the next 15 years up to 2032.
North London Joint Waste Management Strategy	NLJWMS	Document produced by the NLWA to provide the strategic framework for LACW waste management in North London for the period 2004 - 2020.
National Planning Policy Framework	NPPF	The NPPF acts as guidance for local planning authorities and decision-takers, both in drawing up plans and making decisions about planning applications.
National Planning Policy Guidance	NPPG	NPPG is an online living document providing practical guidance on delivering the NPPF.
National Planning Policy for Waste	NPPW	This document sets out the government's detailed waste planning policies.
Previously Developed Land	PDL	Land which is or was occupied by a permanent structure including any cartilage and associated fixed surface infrastructure. This excludes land that has or is occupied by agricultural or forestry building, land developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been agreed.
Policies Map		A map showing the location of the sites identified in the Local Plan. Also known as the Proposals Map.
Processing		Processing refers to the treatment of waste on site. The type of process for treating waste varies depending on the waste type but can vary from crushing construction and demolition waste into secondary aggregate to separating recyclable materials.
Pyrolysis		The heating of waste in a closed environment, in the absence of oxygen, to produce a secondary fuel product.
Railhead		This is a terminus of a railway line that interfaces with another transport mode

		e.g. road network.
RAMSAR		Sites which are wetlands of international importance designated under the Ramsar Convention.
Re-use (preparing for)		Checking, cleaning, repairing, refurbishing, whole items or spare parts.
Re-use and Recycling Centre (RRC)		Facilities to which the public can bring household waste, such as bottles, textiles, cans, paper, green waste and bulky household items/waste for free disposal
Recovery		The process of extracting value from waste materials, including recycling, composting and energy recovery.
Recycling		Turning waste into a new substance or product includes composting if it meets quality protocols.
Renewable Obligations Certificates	ROCs	Green certificates issued to operators of accredited renewable generating stations for the eligible renewable electricity they generate.
Self-sufficiency		Dealing with all wastes within the administrative region where they are produced.
Sites of Importance for Nature Conservation	SINC	SINCs are areas protected through the planning process having been designated for their high biodiversity value.
Site of Special Scientific Interest	SSSI	A specifically defined area which protects ecological or geological features.
Site Waste Management Plan	SWMP	A detailed plan setting out how waste will be managed during a construction project. This is a legal requirement for most construction projects.
Solid Recovered Fuel	SRF	These are solid fuels (also known as 'Refuse Derived Fuels' – RDF) prepared from non-hazardous waste to be utilised for energy recovery.
Sound (Soundness)		According to Planning Policy Statement 12 (para 4.52) for a plan to be "sound" it should be justified, effective and consistent with national policy. "Justified" means that the document must be: founded on a robust and credible evidence base and must be the most appropriate strategy when considered against the reasonable alternatives. "Effective" means that the document must be: deliverable, flexible, and able to be monitored
Source Protection zone		Area designated to protect groundwater
Spatial Planning		Spatial Planning goes beyond traditional

		land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function.
Special Protection Areas	SPA	A SPA is a site considered to be of international importance for species of birds and is designated under the EC Directive on the Conservation of Wild Birds.
Strategic Industrial Locations	SIL	Strategically important industrial areas designated by the London Plan and identified in Local Plans. SILs comprise Preferred Industrial Locations (PIL) and Industrial Business Parks (IBP) and exist to ensure that London provides sufficient quality sites, in appropriate locations, to meet the needs of the general business, industrial and warehousing sectors.
Strategic Environmental Assessment	SEA	A system of incorporating environmental considerations into policies, plans and programmes. It is sometimes referred to as Strategic Environmental Impact Assessment and is a legally enforced assessment procedure required by Directive 2001/42/EC.
Sustainability Appraisal (SA)		A formal process which analyses and evaluates the environmental, social and economic impacts of a plan or programme.
Thermal Treatment		The controlled high temperature burning of waste. Energy recovery is achieved by utilising the calorific value of the materials burnt. The most efficient facilities combine the production of heat (usually in the form of steam) with power (electricity) (combined heat and power referred to as CHP).
Tonnes per annum	tpa	Tonnes of waste each year
Trade waste		Non-household waste (eg business waste) collected by the local authority.
Transfer/Transfer Station		Facility for receiving and 'bulking up' waste before its onward journey for treatment, recycling or disposal elsewhere.
Treatment		Physical, chemical, biological or thermal waste management processes which change the characteristics of waste.
Waste arising		The amount of waste generated in a given

		locality over a given period of time.
Waste Collection Authority	WCA	Organisation responsible for collection of household and trade waste (local authority collected waste). In North London this is each boroughs.
Waste Disposal Authority	WDA	Organisation responsible for disposal of household and trade waste (local authority collected waste) and the provision of Reuse and Recover Centres (RRCs). In North London this is the North London Waste Authority.
Waste Data Interrogator/Hazardous Waste Data Interrogator	WDI/HWDI	Data tool prepared by the EA based on information provided by waste operators. It allows for assessments of strategic waste and general waste flow.
Waste Data Flow	-	WasteDataFlow is the web based system for municipal waste data reporting by UK local authorities to government
Waste Electrical and Electronic Equipment	WEEE	Term used to describe old, end-of-life or discarded appliances using electricity. This categorisation of waste electrical and electronic equipment was introduced by the European Union Waste Electrical and Electronic Equipment Directive (WEEE Directive) which aims to reduce the amount of electrical and electronic equipment being produced and to encourage everyone to reuse, recycle and recover it.
Waste facilities	-	Waste facilities include: <ul style="list-style-type: none"> <li>• Transfer stations</li> <li>• Energy from Waste (Incineration with energy recovery)</li> <li>• Recycling facility</li> <li>• Treatment facility (e.g. mechanical biological treatment, mechanical heat treatment)</li> <li>• Composting facility (In vessel or anaerobic)</li> <li>• Household waste recycling centre</li> <li>• Anaerobic Digestion</li> <li>• Landfill/landraise</li> <li>• Materials recovery facility</li> </ul>
Waste Hierarchy		An order of waste management methods, enshrined in European and UK legislation, based on their predicted sustainability. The hierarchy is summarised as “prevention, preparing for re-use, recycling/composting, other recovery,

		disposal”.
Waste Management Capacity		The amounts of waste currently able to be managed (recycled, composted or recovered) by waste management facilities within North London.
Waste Minimisation		Reducing the volume of waste that is produced. This is part of ‘prevention’ at the top of the Waste Hierarchy.
Waste Planning Authority	WPA	Local authority responsible for waste planning. In North London the seven boroughs are the Waste Planning Authority for their area.
Waste management routes	-	Waste management routes include: <ul style="list-style-type: none"> <li>• Reuse</li> <li>• Recycling</li> <li>• Composting (in vessel or open windrow)</li> <li>• Treatment (recovery via thermal, physical, chemical or biological treatment)</li> <li>• Landfill/landraise</li> <li>• Transfer onwards to other waste management facility</li> </ul>
Waste streams	-	Waste streams include: <ul style="list-style-type: none"> <li>• LACW</li> <li>• C&amp;I</li> <li>• CD&amp;E</li> <li>• Hazardous</li> <li>• Agricultural</li> <li>• LLW</li> <li>• Waste Water/Sewage Sludge</li> </ul>
Waste Transfer Station		A facility where waste is delivered for sorting prior to transfer to another place e.g. landfill.
Zero Waste to Landfill	-	The Mayor of London is committed to working towards zero waste to landfill by 2031. This is set out in Policy 5.16 of The London Plan which states an aim to work towards zero biodegradable or recyclable waste to landfill by 2031.



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## JOINT WASTE PLANNING IN NORTH LONDON

*This Memorandum of Understanding is made this day of 20  
Between*

- (1) **THE LONDON BOROUGH OF CAMDEN** of Town Hall, Judd Street, London WC1H 9LP (“Camden”) and
  - (2) **The LONDON BOROUGH OF BARNET** of Town Hall, The Burroughs, London NW4 4BG
  - (3) **THE LONDON BOROUGH OF HACKNEY** of Hackney Town Hall, Mare Street, London E8 1EA
  - (4) **THE LONDON BOROUGH OF HARINGEY** of Civic Centre, High Road, London N22 8LE
  - (5) **THE LONDON BOROUGH OF ENFIELD** of Civic Centre, Silver Street, London EN1 3XY
  - (6) **THE LONDON BOROUGH OF ISLINGTON** of 222 Upper Street, London N1 1XR.
  - (7) **THE LONDON BOROUGH OF WALTHAM FOREST** of Waltham Forest Town Hall, Forest Road, London E17 4JF
- Referred to throughout this document as the “North London Boroughs”*

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### **I. Background and purpose of Memorandum of Understanding**

- I. This Memorandum of Understanding is an updated version of a Memorandum of Understanding entered into by all the North London Boroughs on 26<sup>th</sup> February 2007.
- II. In order to meet EU and UK Government targets, there is a pressing need for new and expanded waste management infrastructure across London. There is a requirement on the North London Boroughs to make provision for managing more of the waste generated in the area.
- III. The policy of the Mayor’s London Plan is for the capital to become self-sufficient in managing waste by 2031. The North London Boroughs need to plan for a proportion of these facilities in order to maximise self-sufficiency and make provision for the management of north London’s waste in line with European, national and regional requirements.
- IV. The North London Boroughs recognise that the planning system has a central role to play in delivering the necessary infrastructure and to make the most of economic opportunities associated with re-use, recycling and recovery. Given the nature of waste arisings and the opportunity for shared use of infrastructure, the North London Boroughs agree that joint working on a Joint Waste Local Plan Document, hereinafter called the

North London Waste Plan (NLWP), is the most effective way to plan for future waste capacity needs of the North London Boroughs,. In any case, it is recognised that the production of a 'sound' NLWP will require neighbouring boroughs to collaborate in order to develop consistent policies and proposals.

- V. After the Planning Inspector declared in August 2012 that the previous version of the NLWP was not legally compliant because it did not meet the Duty to Co-operate, the North London Boroughs have all individually agreed to take part in a new NLWP and this Memorandum of Understanding details the ways the North London Boroughs will work together to facilitate the production of the new plan.
- VI. The North London Boroughs have individual responsibilities as Waste Collection Authorities and Waste Planning Authorities. Waste disposal functions are carried out on the North London Boroughs' behalf by the North London Waste Authority. This Memorandum of Understanding relates to the waste planning functions and responsibilities of the North London Boroughs, whilst being mindful of existing collection and disposal functions.
- VII. This Memorandum of Understanding provides guidance and records the agreement reached between the North London Boroughs in relation to the following areas:
- Status, duration and arrangements for amendment
  - Mission statement and objectives
  - Principles of partnership working
  - Organisational structure and accountability
  - Project management arrangements
  - Dispute resolution

#### Schedules

1. Organisational arrangements
2. Roles and responsibilities
3. Indicative costs and payment schedule

- VIII. The North London Boroughs are entering into this Memorandum of Understanding pursuant to section 1 of the Local Authority Goods and Services Act 1970.

**1. Status**

- 1.1. This Memorandum of Understanding is an agreement between the North London Boroughs to co-operate in the effective production of the North London Waste Plan (NLWP).

**2. Duration**

- 2.1. This Memorandum of Understanding applies to working arrangements during the lifetime of the production of the NLWP up until the point of adoption of the plan. From then on, a revised written agreement will need to be established to co-ordinate implementation and monitoring of the NLWP. An indicative timetable is set out in paragraph 8.7 below, but the North London Boroughs understand from experience that the timetable for the plan can be subject to extension because of events outside their control.

**3. Arrangements for amendments**

- 3.1. Any proposed amendments to the Memorandum of Understanding will be raised and discussed at meetings of the Planning Officer Group (“POG”) and Heads of Planning (“HOP”) Recommendations for amendments will be put to the Planning Members Group (“PMG”) for ratification (see **Schedule 2** for an explanation of the role of these groups). Changes to the Memorandum of Understanding should aim to enhance the delivery of the Mission Statement and objectives without prejudicing any of the partners. Changes to the Memorandum of Understanding will require approval by each of the North London Boroughs at the appropriate level of their organisation.

**4. Mission Statement and Objectives**

- 4.1. The Mission Statement agreed by the North London Boroughs is:

*“To work together in a co-operative and transparent way to enable the effective production of a ‘sound’, legally compliant NLWP that meets the duty to co-operate and establishes a framework of policies and includes site allocations to meet future waste capacity needs in north London during the period 2016 - 2031.”*

- 4.2. Within this, the North London Boroughs agree to the following Objectives:

- To develop a long-term vision for waste as a resource in north London.
- To co-ordinate the production of the NLWP as expeditiously as possible.

- To work closely with the North London Waste Authority as a key stakeholder to ensure integration with provisions for the collection and management of municipal waste.
- To ensure the NLWP conforms with the policies of the London Plan and the Local Plans of the North London Boroughs.
- To work together to raise awareness amongst stakeholders and promote sustainable waste management in north London.

## 5. Principles of partnership working

- 5.1. The North London Boroughs agree to conform to the following principles of partnership working:

**Co-operation:** agree to co-operate with each other with the aim of achieving the most sustainable waste management solutions for north London as a whole, whilst taking into consideration the implications for each North London Borough.

**Accountability:** actions and decisions recommended by the North London Boroughs should reflect the best interests of all council tax payers.

**Transparency:** will seek joint solutions to waste planning through communicating in an open and transparent manner.

## 6. Appointment of Lead Borough.

- 6.1. The London Borough of Camden (“Camden”) shall act as the Lead Borough and legal entity for the North London Boroughs and shall enter into all contracts with third parties on behalf of the North London Boroughs. All contracts shall be awarded by the Director of Culture and Environment at Camden in accordance with Camden’s Contract Standing Orders.
- 6.2. Camden will be responsible for the recruitment and management of the Programme Manager and any additional staff employed to support the work of the Programme Manager.
- 6.3. Camden will at all times act in accordance with the policies and project management arrangements set out in this Memorandum of Understanding.
- 6.4. Prior to entering into all contracts with third parties, Camden will convene a meeting of the Project Panel, which shall consist of the members of the POG, a representative of Camden’s Borough Solicitor, a representative of Camden’s Environment Procurement Hub and the Programme

Manager. All decisions to let contracts shall be made in consultation with this Project Panel.

## **7. Organisational structure and accountability**

- 7.1. The North London Boroughs agree to work together within the organisational arrangements set out in **Schedule 1** and to undertake the detailed roles and responsibilities listed within **Schedule 2**.

## **8 Project management arrangements**

### *Procurement of contracts*

- 8.1. Camden will oversee the recruitment of consultants and contractual arrangements between Camden and the consultants. All procurement activities carried out by Camden will be conducted in line with UK and EU legislation.

### *Timing and frequency of meetings*

- 8.2. Planning Officers Group meetings will be held every six weeks and the Heads of Planning and Planning Members Group meetings at key decision points in the plan-making process. More frequent meetings may be held to progress the plan at key stages. (See schedule 2 for terms of reference for these Groups)

### *Protocol for reporting and meetings*

- 8.3. The North London Boroughs will provide one representative at the appropriate level to attend POG, HOP and PMG meetings and will use reasonable endeavours to provide consistent attendance of personnel.
- 8.4. The North London Boroughs will provide the consultants and the Programme Manager with information held which may assist with the production of the NLWP, with the understanding that non-publicly available information will remain confidential amongst partners.
- 8.5. The North London Boroughs will undertake regular internal briefings within their individual authority to maintain awareness of members and others and assist the decision-making process.
- 8.6. The North London Boroughs will carry out consultation arrangements in line with the timing and format set out in the revised Consultation Protocol, to be agreed by the PMG.

### *Decision-making arrangements*

- 8.7. To enable the plan-making process to proceed as efficiently as possible, the North London Boroughs will aim to progress and not delay decisions. Predicted key decision points are listed below:



Key decision	Predicted timing
SA scoping report	Feb/March 2014
Regulation 18 draft Plan to be signed off	January 2015
Pre-submission Plan to be signed off	Winter 2015
Submission	Autumn 2016
Hearings	Winter 2017
Adoption	Autumn 2017

- 8.8. Heads of Planning will make recommendations on the content of the NLWP to the PMG. The PMG will meet before the key decision stages of the NLWP and at other times where recommended by the HOP. The PMG will review progress on the NLWP, the key issues arising during the production of the NLWP and other matters referred to them by the HOP.
- 8.9. The Programme Manager will provide Directors of Environment and HOP of the North London Boroughs with regular reports to keep them informed of progress.
- 8.10. Each of the North London Boroughs is required to seek ratification of the NLWP at each key decision stage. The North London Boroughs will use their reasonable endeavours to deal promptly and expeditiously with all required approvals of the plan in their own Borough including full Council as necessary.

*Press and public relations*

- 8.11. The emphasis will be on joint publicity arrangements for the NLWP in accordance with the agreed principles of partnership working and the Consultation Protocol. Publicity and public relations will be co-ordinated through the Programme Manager. Each North London Borough will endeavour to keep others informed of all relevant press releases to be publicised by Boroughs individually.

**9. Costs**

- 9.1. North London Boroughs agree to share on an equal basis (one seventh per borough) all costs associated with the Mission Statement and Objectives of this Memorandum of Understanding more specifically set out at paragraph 9.5 below (the "Costs"). An indicative budget for the NLWP is set out in Schedule 3. The North London Boroughs agree that control of expenditure on the NLWP is a priority and all appropriate steps will be taken by Camden to ensure that only necessary expenditure is incurred. Camden further agrees to pay the Costs only after consulting with the North London Boroughs and only on expenditure incurred which directly relates to its obligations as Lead Borough under this Memorandum of Understanding.
- 9.2. The Programme Manager will produce every quarter a financial report of the Costs of producing the NLWP, highlighting any variations. At the start

of every financial year, the Programme Manager will produce for HOP a project plan for the year ahead, reviewing expenditure in the past year and projecting expenditure for the financial year and the rest of the plan period, highlighting any changes to the indicative budget.

- 9.3 Camden will invoice each North London Borough for its share of the Costs twice a year. In October each North London Borough will be invoiced for expenditure incurred in the first half of the financial year. In March Camden will invoice each North London Borough for the remaining expenditure incurred in the financial year which will take into account any variation in costs detailed in the quarterly monitoring reports of the Programme Manager.
- 9.4 Where Camden seeks funds additional to the Costs in connection with the production of the NLWP, these will not be incurred without the approval of the HOP in conjunction with their PMG representative. Where this approval for additional expenditure is given, the North London Boroughs agree that Camden may undertake the additional expenditure or seek a variation of the contract with Urban Vision Partnership Limited, company number 5292634, (who have been appointed to advise and prepare the NLWP) and to give effect to such variation each of the North London Boroughs further undertakes to make payment of their proportion of the cost of such contract variation.
- 9.5. **Schedule 3** sets out a breakdown of the indicative Costs. Over a four year period the cost to each North London Borough will be approximately £159,000 or an average of approximately £39,750 per annum. The actual amount invoiced by Camden will vary depending on the stage of the NLWP.
- 9.6 In the event that any of the North London Boroughs for any reason withdraw from participation in this agreement they shall remain liable for all Costs and expenditure detailed in this clause 9 throughout the duration of this Agreement
- 9.7 All North London Boroughs shall make payment within thirty (30) days of receipt of an invoice for payment from Camden.
- 9.8. If any sum payable under this Agreement is in arrears for more than thirty (30) days after the due date, Camden reserves the right, without prejudice to any other right or remedy, to charge interest on such overdue sum on a day to day basis from the original due date until paid in full at a rate of 3% above Bank of England base lending rate in force from time to time.
- 9.9. Any North London Borough may notify Camden in writing within fourteen (14) days of receipt of an invoice if the North London Borough considers such invoice incorrect or invalid for any reason and the reasons for withholding payment failing which the North London Borough will raise

no objection to any such invoice and will make full payment in accordance with it.

**10 Dispute resolution-**

- 10.1 In the case of disagreement between the North London Boroughs, all efforts will be made to resolve problems and explore alternative solutions where appropriate to achieve the Mission Statement and Objectives of this Memorandum of Understanding.
- 10.2 The Programme Manager will oversee negotiations in resolving any dispute between the North London Boroughs.
- 10.3 The matter shall be referred in the first instance to the HOP who shall discuss the issue and use their reasonable endeavours to resolve the same.
- 10.4 If after discussion the matter has not been resolved, the matter relevant to the resolution shall be referred to the Directors of Environment or equivalent Chief Officer of each North London Borough who shall discuss the issue and use their respective reasonable endeavours to reach agreement. If agreement still cannot be reached the Directors of Environment or equivalent Chief Officer of the North London Boroughs may appoint an independent arbitrator who shall be a member of the Royal Town Planning Institute and whose decision shall be final and binding on the parties. All costs in connection with the appointment and services of the independent arbitrator shall be shared equally by the North London Boroughs.
- 10.5 Should disagreements between the North London Boroughs remain unresolved, all efforts will be made to maintain joint working arrangements between all North London Boroughs, with withdrawal from the agreement representing the last resort.
- 10.6 Any North London Borough may withdraw from participation in this Agreement by giving six months notice to the Programme Manager who will then notify the other North London Boroughs of this. Any North London Borough serving notice of withdrawal from the Agreement under this clause will remain liable for its share of the Costs throughout the remaining duration of the Agreement as set out in clause 9.6.
- 10.7 In the case of one or more of the North London Boroughs choosing to withdraw from joint working arrangements, the remaining North London Boroughs reserve the right to continue to work together to develop the NLWP for any remaining sub-regional area(s).

## **11. Further Agreements**

11.1 The North London Boroughs agree to consider any legislative changes affecting this Agreement and shall consider whether any additional agreements for specific services entered into by all or some of the North London Boroughs affect this Agreement in any material way and will if necessary enter into any further Agreements.

## **12 Confidentiality**

12.1 The North London Boroughs shall not divulge or dispose of or part with possession, custody or control of any confidential material or information provided to the North London Boroughs pursuant to this Agreement or obtained by the North London Boroughs pursuant to the Agreement, other than in accordance with the express written instructions of the other North London Boroughs.

12.2 The North London Boroughs shall take all reasonable steps as from time to time shall be necessary to ensure compliance with the provisions of Clause 12 by its employees and agents.

12.3 Clause 12 shall survive any termination of the Agreement.

## **13 Indemnity**

13.1 Subject to clause 13.4 below the North London Boroughs will fully indemnify each other in respect of any and all costs, expenses and liabilities incurred directly or indirectly as a result of the performance of their obligations under this Agreement

13.2 Subject to clause 13.4 below the North London Boroughs will fully indemnify Camden the lead Borough in respect of all reasonable costs expenses and liabilities directly incurred with regard to the performance of all of Camden's obligations under the terms of this Agreement.

13.3 It is hereby agreed that none of the North London Boroughs shall be liable to indemnify each other or Camden for any costs expenses and liabilities (hereafter "costs") ,howsoever arising, if these costs are incurred as a result of the wilful misconduct or negligence of any of the North London Boroughs or Camden.

13.4 To avoid doubt each North London Borough's liability under this Agreement is several and not joint.

## **14. Intellectual Property Rights**

14.1 Camden shall procure that it shall include a clause in any consultant's or contractor's appointment appointed to carry out services or works pursuant to Camden's role as Lead Council, requiring the consultant or

contractor to grant to each of the North London Boroughs all necessary intellectual property rights to copy and make full use of any work undertaken by or on behalf of the North London Boroughs for the purpose of their appointment (including but not limited to any data, reports, drawings, specifications, designs, inventions or other material produced or acquired in the course of such work).

- 14.2 Each North London Borough (the Licensor) grants to each of the other North London Boroughs (the Licensee) an irrevocable, non-exclusive, non-terminable, royalty-free licence, to copy and make full use of any work carried out by the Licensor in any work undertaken by or on behalf of the North London Boroughs for the purpose of this Agreement.
- 14.3 The North London Boroughs together reserve the right to determine whether the result of the works shall be published and if so on what conditions.
- 14.4 The North London Boroughs acknowledge and agree that any proposal by one member to grant a licence to a third party to use the documents and materials described in 14.1, shall be subject to the agreement of all the other North London Boroughs.
- 14.5 Any changes or edits made to the documents and materials by any of the North London Boroughs, if made under the terms of the Agreement shall be jointly owned by the North London Boroughs. Copyright in any edits or changes made to the documents and materials at the expiration of the term shall be owned by the relevant author.

## **15. Third Parties**

- 15.1 A person who is not a party to this Memorandum of Understanding shall have no rights under the Contracts (Rights of Third Parties) Act 1999 to enforce any of its terms.

## **16. Governing Law and Jurisdiction**

- 16.1 This Memorandum of Understanding shall be governed by English law, and each of the parties hereby submits to the exclusive jurisdiction of the Courts of England and Wales.

## **17. Counterparts**

- 17.1 This Memorandum of Understanding may be entered into in the form of two or more counterparts, each executed by one of the parties.

**IN WITNESS** whereof this document has been executed and delivered as a Deed by the parties the day and year first before written.

THE COMMON SEAL of THE )  
MAYOR AND BURGESSES OF THE )  
LONDON BOROUGH OF CAMDEN )  
was hereunto affixed in the presence of:- )

Authorised Signatory

Authorised Signatory

THE COMMON SEAL of THE )  
MAYOR AND BURGESSES OF THE )  
LONDON BOROUGH OF BARNET )  
was hereunto affixed in the presence of:- )

Authorised Signatory

Authorised Signatory

THE COMMON SEAL of THE )  
MAYOR AND BURGESSES OF THE )  
LONDON BOROUGH OF HACKNEY )  
was hereunto affixed in the presence of

Authorised Signatory

Authorised Signatory



THE COMMON SEAL of THE )  
MAYOR AND BURGESSES OF THE )  
LONDON BOROUGH OF HARINGEY )  
was hereunto affixed in the presence of )

Authorised Signatory

Authorised Signatory

THE COMMON SEAL of THE )  
MAYOR AND BURGESSES OF THE )  
LONDON BOROUGH OF ENFIELD )  
was hereunto affixed in the presence of )

Authorised Signatory

Authorised Signatory

THE COMMON SEAL of THE )  
MAYOR AND BURGESSES OF THE )  
LONDON BOROUGH OF ISLINGTON )  
was hereunto affixed in the presence of )

Authorised Signatory

Authorised Signatory

THE COMMON SEAL of THE )  
MAYOR AND BURGESSES OF THE )  
LONDON BOROUGH OF WALTHAM FOREST)  
was hereunto affixed in the presence of:- )

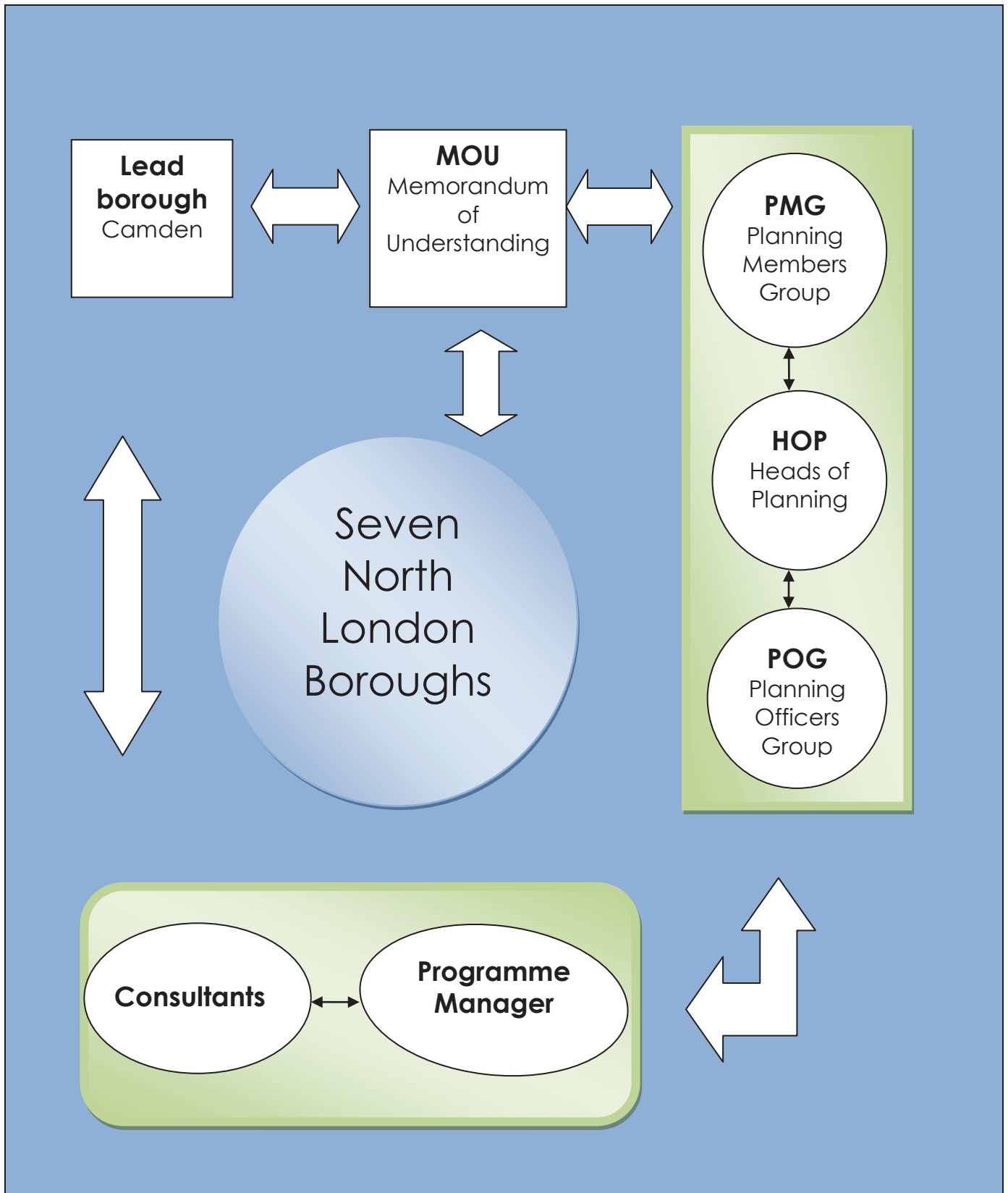
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**SCHEDULE 1**

**Organisational arrangements**

Organisational arrangements





**SCHEDULE 2**

**Roles and responsibilities**





### **Planning Officers Group (POG)**

#### ***Role***

- To take ownership of the plan preparation process through a close working relationship with the Programme Manager, the consultants, the Heads of Planning (HOP), and the Planning Members Group (PMG), and where necessary provide additional capacity as a working group.

#### ***Membership/personnel***

- Each North London Borough will provide one senior level planning officer to attend the POG. Officers should currently work in forward planning, and have a good overview of the Local Plan preparation process within their Borough and a broad understanding of waste planning issues.
- There may also be a need for involvement of other appropriate officers from each Borough with a background in sustainable development, at key stages of the SA/SEA process.
- The Group will be chaired by a planner from one of the North London Boroughs in rotation.
- A programme of meetings will be organised by the Programme Manager. However if two or more North London Boroughs wish there to be a meeting outside these arrangements, they may request the Programme Manager to convene a meeting and such a meeting shall take place as soon as practicably possible

#### ***Responsibilities of POG members***

- To actively participate in regular six-weekly meetings with the other boroughs and the consultants, to steer the NLWP preparation process.
- To contribute to progress reports with recommendations to be put to the HOP and PMG for joint decision-making where appropriate.
- To provide comments on the work of the consultants and on documents and proposals from the Programme Manager when requested
- To provide additional working capacity at certain stages in the process – in particular logistical arrangements during consultation stages.
- Each planning officer to take responsibility for reporting progress internally within their Borough and provide regular feedback to POG members, particularly where problems are identified.
- Each planning officer to take responsibility for arranging reporting mechanisms internally within their Borough, to enable ratification of the plan to proceed according to plan-making timetable.

## **Heads of Planning (HOP)**

### **Role**

- To oversee the NLWP preparation process
- To consider the recommendations of the Planning Officers Group (POG) and to make recommendations to Planning Members Group (PMG) on the content of the NLWP
- To agree the timetable, and budget of the NLWP and agree any necessary changes

### **Membership/personnel**

- The North London Boroughs shall be represented equally by the Head of the Planning Service in each of the North London Boroughs
- Meetings will be convened by the Lead Borough, through the Programme Manager. However if two or more North London Boroughs wish there to be a meeting outside these arrangements, they may request the Programme Manager to convene a meeting and such a meeting shall take place as soon as practicably possible.

### **Responsibilities of HOP members**

- To meet at key decision points in the preparation of the plan
- To consider whether the NLWP is in line with the Local Plan and the Sustainable Community Strategy/Corporate Plan of their own Borough and to bring to the attention of HOP any inconsistencies at the earliest opportunity
- To brief the Lead Member for Planning and the PMG member, if different, within their own Borough on the progress of the NLWP and any issues that arise
- To secure funding within own Borough for the agreed budget of the NLWP
- To ensure that any approval process required for the NLWP in each North London Borough is carried out promptly and expeditiously

## **Planning Members Group (PMG)**

### ***Role***

- To oversee the plan preparation process and provide feedback in response to recommendations of the Heads of Planning (HOP).
- To jointly approve recommendations wherever possible and seek the approval of Borough Cabinet/Executive/Policy and Resources Committee (“executive”)<sup>1</sup> or Full Council approval where necessary.

### ***Membership/personnel***

- The North London Boroughs will be represented equally, with one executive member or deputy (with responsibility for planning, environment or similar) from each of the seven North London Boroughs.
- Meetings will be convened by the Lead Borough, through the Programme Manager. However if two or more North London Boroughs wish there to be a meeting outside these arrangements, they may request the Programme Manager to convene a meeting and such a meeting shall take place as soon as practicably possible.

### ***Responsibilities of PMG members***

- To meet at key decision points in the plan preparation process.
- To make arrangements for appointing the chair and vice chair(s) of the PMG.
- To make joint decisions in response to recommendations from HOP throughout the development of the plan, where Borough executive or Full Council approval is not required.
- To consider agreements with other local planning authorities relating to a jointly agreed strategy on cross boundary matters under the Duty to Co-operate.
- To provide the main link between key decisions made within individual Boroughs and decisions made through joint working on the PMG
- To report back to the executive within their respective Borough and ensure key decisions are made at executive level and fed back via the Programme Manager.
- To report to Full Council and help to ensure approval is made at the Submission and Adoption stages. To report this back via the Programme Manager.

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<sup>1</sup> Camden, Enfield, Hackney, Haringey and Waltham Forest have a Cabinet. Islington has an Executive. Barnet has a Policy and Resources Committee.

- To use information provided by the HOP to promote progress on the development of the NLWP within their respective Borough decision-making machinery.

## **Programme Manager**

### ***Role***

- To lead in co-ordinating activity and ensuring progress on all aspects of the plan-making process, and to provide the main point of contact for all parties.

### ***Membership/personnel***

- The Programme Manager will be a full time post suitable for a Senior Officer to be recruited externally or provided by one of the North London Boroughs, and managed and accommodated within one of the Borough's offices by Camden.

### ***Responsibilities of Programme Manager***

- To lead and take responsibility for the project programme, ensuring necessary outputs are produced by all partners at key stages of the process.
- To oversee the NLWP budget, and report on financial arrangements, ensuring Boroughs are informed of payment requirements.
- To act as the main representative for the North London Boroughs in communicating with external organisations, in particular the Greater London Authority and London Councils at key points in the process and to represent the North London Boroughs in discussions with key stakeholders.
- Take a lead on co-ordinating all aspects of consultation, in conjunction with the consultants and key external stakeholders such as the North London Waste Authority.
- To lead on the responsibilities of the North London Boroughs on the Duty to co-operate and to make responses on behalf of the North London Boroughs on relevant correspondence, plans and programmes of other organisations.
- To report recommendations from the POG to HOP and from HOP to PMG at key points in the process and report back to all bodies on all decisions made.
- To co-ordinate the production of progress reports to Directors of Environment and Heads of Planning of the North London Boroughs
- To maintain regular liaison with North London Borough Cabinet members to enable key decisions to be reported back to HOP and POG.
- To manage the contract and maintain regular liaison with the consultants outside scheduled meetings in relation to progress, logistical



arrangements etc.

- To provide members of the POG with 3-4 months notice of each ratification stage of the plan-making process, to enable reporting mechanisms to be arranged within each North London Borough in accordance with the plan-making timetable.
- To provide support to the North London Boroughs outside POG meetings in order to facilitate the plan-making process e.g. training programmes for officers and members.
- To oversee negotiations in the case of any dispute between the North London Boroughs.
- To report to the POG, HOP and PMG and act upon agreements made
- To manage additional NLWP staff

**SCHEDULE 3**

**Indicative costs and payment schedule**

**Indicative Budget for the NLWP**

	<b>2013/14</b>	<b>2014/15</b>	<b>2015/16</b>	<b>2016/17</b>	<b>2017/18</b>	<b>Total</b>
Consultant Data Study	£42,956					£42,956
Consultant Plan	£34,186	£113,302	£106,624	£73,097	£10,076	£337,284
Programme Management	£99,921	£105,372	£110,678	£87,701	£16,188	£419,860
Publicity	£2,065	£2,041	£43,200	£29,700	£12,700	£89,706
Legal	£2,500	£8,650	£10,000	£44,000	£5,000	£70,150
Examination				£135,000		£135,000
<b>TOTAL</b>	<b>£181,628</b>	<b>£229,365</b>	<b>£270,502</b>	<b>£369,498</b>	<b>£43,963</b>	<b>£1,094,955</b>
Per borough	£25,947	£32,766	£38,643	£52,785	£6,280	£156,422

All costs are shared equally by the boroughs. The indicative budget for the NLWP is based on the following assumptions

- Procurement of the NLWP data study contract
- Procurement of the NLWP consultancy support contract
- Employment of Programme Manager to end of project
- Employment of Principal Planner up to September 2016 (end of hearings)
- The NLWP goes through the following stages: Regulation 18, Regulation 19, Examination and Adoption
- Costs associated with consultation at all stages
- Provision of legal advice
- Costs of holding examination including employment of Programme Officer

## **Planning and Compulsory Purchase Act, Section 33A – Duty to Co-operate**

Memorandum of Understanding (“MoU”) providing a framework for co-operation between London Legacy Development Corporation (“Legacy Corporation”) and the North London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest (“North London Boroughs”) undertaking the North London Waste Plan (“NLWP”).

### **Background**

1 The North London Boroughs are working together as waste planning authorities (“WPAs”) to prepare the NLWP. The NLWP will set out the planning framework for waste management in the North London Boroughs for the next 15 years. It will identify sites for waste management use and set out policies for determining waste planning applications. Adoption of the NLWP is expected to be in early 2017.

2 The Legacy Corporation is a Mayoral development corporation, established in March 2012 with responsibility for securing the regeneration of an area of London focused on the former Olympic Park. The Legacy Corporation’s area includes parts of the London Boroughs of Newham, Waltham Forest, Hackney and Tower Hamlets (“Host Boroughs”). The London Boroughs of Hackney and Waltham Forest are both members of the North London Boroughs.

3 By virtue of article 3 of the London Legacy Development Corporation (Planning Functions) Order 2012 (“2012 Order”) and section 7A of the Town and Country Planning Act 1990, the Legacy Corporation is the planning authority for the defined “*development area*”<sup>1</sup> for the purposes of Part 3 of the Town and Country Planning Act 1990 and Parts 2 and 3 of the Planning and Compulsory Purchase Act 2004. As a result it is responsible for all development management decisions and development plan preparation including waste planning within the Legacy Corporation’s area. In August 2014, the Legacy Corporation published its draft local plan for statutory consultation (“Local Plan”). The draft Local Plan carries forward and develops growth ambitions for the Legacy Corporation’s area that are set out in the London Plan 2011 and builds on the Host Borough development plan documents that were adopted at the time that the Legacy Corporation received its planning powers.

4 The London Plan has a strategy for London to achieve net self-sufficiency in managing waste arising in London by 2026.. Under the London Plan, each London borough including each of the North London Boroughs is given an apportionment of waste arisings for which it should plan waste management provision. The North London Boroughs are planning to meet their combined apportionment targets through the NLWP. The London Plan does not include a waste apportionment for the Legacy Corporation planning authority area, which includes parts of Hackney and Waltham Forest from the North London Boroughs. A formal working relationship is required between the Legacy Corporation and the North London Boroughs in securing the delivery of an effective waste plan for North London.

### **Proportion of North London Boroughs within Legacy Corporation area**

5 The proportion of each borough area that falls within the Legacy Corporation Boundary is set out within Table 1 below.

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<sup>1</sup> Defined in Article 2 to the Order as meaning the area of land described as a Mayoral development area, and in relation to which a Mayoral development corporation is established, by the London Legacy Development Corporation (Establishment) Order 2012

**Table 1 Proportion of Legacy Corporation Area by Borough**

LB Newham	63%
LB Tower Hamlets	16%
LB Hackney	16%
LB Waltham Forest	5%

6 Approximately seventy six percent (76%) of the projected growth in the Legacy Corporation's draft Local Plan is expected to come forward within the boundary of the London Borough of Newham. Just over a further eighteen percent (18%) is expected in the London Borough of Tower Hamlets, and the remaining six percent (6%) is expected to come forward within the London Borough of Hackney. None is planned within the London Borough of Waltham Forest as this portion comprises the Lea Valley Hockey and Tennis Centre at Eton Manor and Chobham Academy school playing fields which have open space/MOL designation, and the established Temple Mills Bus Depot site, designated as a Locally Significant Industrial Site.

#### ***Existing Frameworks for Co-operation***

7 A formal memorandum of understanding governing co-operation in plan making (amongst other activities) between the Legacy Corporation and the London Boroughs of Hackney and Waltham Forest was agreed in 2013. Co-operation is already taking place between the Legacy Corporation and the London Boroughs of Hackney and Waltham Forest in terms of plan-making. This includes attendance of borough officers representing Hackney and Waltham Forest at the established Planning Policy Forum Meetings.

8 A further formal memorandum of understanding exists between the seven North London Boroughs as the basis of working collaboratively on the NLWP. It establishes the lead borough, sets out how contracts will be let and creates terms of reference for the inter-borough grouping. The memorandum of understanding between the seven North London Boroughs describes how disputes will be resolved. It sets out the timetable and budget for the NLWP and how costs will be shared.

9 The North London Boroughs have prepared a Duty to Co-operate Protocol which will be used as the basis of co-operation; principally with other WPAs who receive significant quantities of waste from north London.

#### ***Co-operation between Legacy Corporation and the North London Boroughs***

10 The North London Boroughs and Legacy Corporation have co-operated in the preparation of:

- the Legacy Corporation draft Local Plan through meetings and correspondence via email and letter; and
- the NLWP through feedback on potential sites in the Legacy Corporation area provided by Legacy Corporation.

11 Co-operation will continue to take place through appropriate methods including:

- written correspondence
- exchange of information and verification of data
- meetings:
  - Attendance of borough officers representing London Boroughs of Hackney and Waltham Forest at the established Planning Policy Forum Meetings, which take place every month to six weeks in accordance with the 2013 memorandum of understanding.
  - Meetings between officers of the North London Boroughs and the Legacy Corporation at least annually and more frequently where it is agreed that such additional meetings are appropriate and necessary to the preparation or

review of relevant Development Plan Documents.

- agreement of key issues
- statement of common ground
- Memorandum of Understanding

12 The future co-operation between the Legacy Corporation and the North London Boroughs will be focused on the following areas with a view towards maximising the effectiveness of our respective plan making and securing sustainable development in accordance with our respective corporate objectives:

- policy approach to planning for waste within each local plan
- site analysis and selection within each local plan
- the further preparation, collection and updating of evidence base documents relating to waste planning
- the exchange of data (including electronically held data and GIS mapping data) relating to the evidence base for development plan documents
- the approach of the NLWP to identifying potential waste sites in North London to meet future capacity requirements in compliance with the London Plan
- the approach of the Legacy Corporation to meeting its strategic waste planning responsibilities where site capacity for waste management has not been or cannot be met by appropriate identified sites within the Legacy Corporation Local Plan for the areas of Hackney and Waltham Forest within the Legacy Corporation area

13 To secure the delivery of an effective waste plan for North London, the North London Boroughs and the Legacy Corporation agree that the areas listed in Table 2 are potentially suitable for waste management use. The North London Boroughs and Legacy Corporation have reached this conclusion after carrying out their own assessments of the areas described in evidence base documents. Acceptability of proposals for waste management uses in those locations will be determined with reference to Policy IN.2 and other relevant policies within the Legacy Corporation Local Plan and any other relevant material considerations that apply to that proposal. The North London Boroughs and the Legacy Corporation will take steps to reflect this in their respective plans.

**Table 2 Areas in Hackney and Waltham Forest portions of the Legacy Corporation area potentially suitable for waste management use**

Area ref	Site Name	Borough	Waste facility type: potential suitability
HAC09	Bartrip Street LSIS	Hackney	Waste transfer; Processing and recycling
HAC13	Palace Close SIL (to the west of Chapman Road)	Hackney	Waste transfer; Processing and recycling
	Temple Mills Lane LSIS	Waltham Forest	Waste transfer; Processing and recycling

14 The Legacy Corporation will decide planning applications for waste uses in its area in line with its Local Plan including Policy IN.2: Planning for waste, taking full account of the waste apportionment targets set for each Borough within the London Plan, the adopted local waste plans or waste planning policy for that Borough and the development of new or review of existing adopted waste plans for that Borough.



**Resources and timescales**

15 The Legacy Corporation and the North London Boroughs will use reasonable endeavours to respond in a timely manner to any request for information from the other.

16 The Legacy Corporation and the North London Boroughs officers had a preliminary agreement in place for the hearings of the Legacy Corporation Local Plan in March 2015 which will be subject to formal ratification by each North London Borough. An update to this agreement may be required in 2016 at the submission of the NLWP to the Secretary of State.

17 Both parties will inform each other of any changes in their plan making timetable.

**Level of sign off -**

18 The North London Boroughs will sign off agreements under the Duty to Co-operate using appropriate measures under their respective constitutions.

19 The Legacy Corporation will sign off agreements under the Duty to Co-operate using delegated powers.

**Confidentiality**

20 In the course of our co-operation, the Legacy Corporation and the North London Boroughs may exchange confidential information. Each organisation will treat any confidential information provided to it by the other with the same degree of care that it treats its own confidential information, and never with less than reasonable care, and shall not at any time disclose such information except:

- a) to employees, members, officers, representatives or advisers who need to know such information for the purposes of carrying out their organisation's obligations under this letter; or
- b) as may be required by law, a court of competent jurisdiction or any governmental or regulatory authority.

21 The Legacy Corporation and the North London Boroughs shall ensure that employees, officers, representatives or the advisers to whom confidential information is disclosed shall comply with the above restrictions. Neither the Legacy Corporation nor the North London Boroughs shall use the other's confidential information for any purpose other than to perform its obligations under this letter.

**Monitoring**

22 This Memorandum shall continue until such time as the Legacy Corporation ceases to be the local planning authority for the development area (see para 3 above) or any part thereof. The terms of this MoU will be reviewed at a meeting between officers of the Legacy Corporation and the North London Boroughs at least annually. If either the Legacy Corporation or the North London Boroughs thinks it necessary, the terms of the co-operation can be reviewed earlier on at least seven days written notice. If following any review, either the Legacy Corporation or the North London Boroughs reasonably considers that modifications to this MoU are necessary to maximise the effectiveness of our respective plan making, the Legacy Corporation and the North London Boroughs shall use reasonable endeavours to agree such modifications.

23 Neither the Legacy Corporation nor the North London Boroughs intend this MoU to create legally enforceable obligations, and nothing in this letter should be construed as conflicting with any agreement or contract involving either the Legacy Corporation or any of the North London Boroughs, or with any statutory or other legal duties of the Legacy Corporation or any of the North London Boroughs.

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Signed on Behalf of the  
London Borough of Barnet

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Date

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Signed on Behalf of the  
London Borough of Camden

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Date

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Signed on Behalf of the  
London Borough of Enfield

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Date

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Signed on Behalf of the  
London Borough of Hackney

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Date

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Signed on Behalf of the  
London Borough of Haringey

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Date

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Signed on Behalf of the  
London Borough of Islington

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Date

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Signed on Behalf of the  
London Borough of Waltham Forest

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Date

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Signed on Behalf of the London  
Legacy Development Corporation

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Date

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**Haringey Council**

<b>Report for:</b>	<b>Regulatory Committee 2 July 2015</b>	<b>Item Number:</b>	
<b>Title:</b>	<b>Statement of Community Involvement (SCI)</b>		
<b>Report Authorised by:</b>	<b>Lyn Garner, Director Regeneration, Planning and Development</b>		
<b>Lead Officers:</b>	<b>Matthew Patterson</b> Interim Head of Policy, Strategic Transport and Infrastructure <a href="mailto:Matthew.Patterson@haringey.gov.uk">Matthew.Patterson@haringey.gov.uk</a>  <b>Neil Goldberg</b> Planning Policy <a href="mailto:Neil.Goldberg@haringey.gov.uk">Neil.Goldberg@haringey.gov.uk</a>		
<b>Ward(s) affected: All</b>	<b>Report for Key Decision</b>		

## 1 The issue under consideration

- 1.1 This report seeks Regulatory Committee to note and make comments on:
- the draft revised Statement of Community Involvement (SCI) at Appendix A
- 1.2 Section 18 of the Planning and Compulsory Purchase Act (2004) requires local planning authorities to prepare a Statement of Community Involvement (SCI). The SCI must set out how persons, who appear to the authority to have an interest in matters relating to development in the area, will be involved in the authority's plan making and development management functions.
- 1.3 Haringey's SCI was adopted in 2008 following public consultation and an examination in public and was subsequently updated in 2011. It provides a commentary on the (then) new planning system, on the production of the SCI and upon the objectives and principles of community involvement. There are further chapters relating to involvement in the LDF (now the Local Plan) and the Development Management Process, and a detailed account of the consultation techniques to be employed in the preparation of different types of planning documents and for development management.



## Haringey Council

- 1.4 The adopted SCI is now four years old. Since its adoption there have been a number of amendments to the 2004 Act and the Regulations governing development planning in England including the enactment of the Localism Act 2011 and the publication of the National Planning Policy Framework 2012 and National Planning Practice Guidance. The principal effect of these changes, in relation to SCIs, is that they are no longer subject to examination in public. There have also been changes to planning terminology, comprising the re-introduction of the concept of Local Plans and a move from development 'control' to 'management' in the planning application process. Other important changes brought about by legislative changes include neighbourhood planning and the process of preparing neighbourhood plans, the Duty to Cooperate and the introduction of the Community Infrastructure Levy.
- 1.5 Locally, Haringey's Local Development Scheme is to be amended as a consequence of the preparation of Haringey's proposed new Local Plan, which includes most notably, Area Action Plans for Tottenham and Wood Green and a Highgate Neighbourhood plan which were not envisaged when the SCI was adopted. The Councils commitment to the efficient use of resources and the growth in new media have also prompted new thinking around the role of tradition and emerging communications media.
- 1.6 For the reasons set out in this paper, it is therefore proposed to consult upon a simpler, streamlined and updated SCI for Haringey.
- 1.7 Further details on the proposed updates are provided below.

## 2 Cabinet Member introduction

### What is the SCI?

- 2.1 The SCI is the document that sets out the standards to be achieved by the local authority in involving the community in the preparation, alteration and continuing review of all local development documents and planning applications.
- 2.2 The document should be a clear public statement enabling the community to know how and when they will be involved in the preparation of local development documents and how they will be consulted on planning applications.



## Haringey Council

2.3 The SCI should ensure the active meaningful and continued involvement of the community throughout the process. The National Planning Policy Framework (NPPF) states that it is essential for 'neighbourhoods, local organisations, and businesses to be actively involved as early as possible'. This document identifies how this can be put into practice effectively both throughout the plan making process and for planning applications.

2.4 To achieve this, the SCI sets out the following:

- When and by what means the Council will engage with the community and stakeholders in the consideration of both the preparation of the local plan and the planning application process.
- how these will be publicised.
- how community and stakeholder views will inform later stages of documents.

### 3 Recommendation

3.1 That Regulatory Committee note and provide comments on:

- the draft revised Statement of Community Involvement (SCI) at Appendix A

### 4 Alternative option considered

4.1 The Council could choose not to review the SCI. However, the Council is required to adopt an up-to-date SCI, pursuant to section 18 of the Planning and Compulsory Purchase Act 2004 (as amended), taking account of national, regional and local policy changes.

4.2 Haringey's draft Local Plan, which was consulted on during the spring 2015, will be assessed by a Planning Inspector at an Examination in Public against the Soundness Test set out in Paragraph 182 of the National Planning Policy Framework. The NPPF states that a local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;





**Haringey Council**

- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

4.3 A justified Plan means one which is based on a robust and credible evidence base including evidence of participation of the local community and others having a stake in the area. The Haringey SCI provides the framework for assessing that the Local Plan is justified and therefore the Council needs to update its SCI to ensure the relevant practices and procedures for consultation and community participation are followed

4.4 A number of changes have been made since the adoption of the previous SCI including the adoption in July 2014 of a revised Planning Protocol to ensure the highest standards of probity in the performance of its planning function the introduction but the Government of the Development Management Procedures Order 2015 with revised consultation requirements, the Council's Overview and Scrutiny Review of Community Engagement and the Council's need to streamline and become more efficient which has led to a move to self-service and paperless systems.

4.5 Not updating the SCI to take account of these local changes means the Development Management service is not meeting the requirements of the 2015 Development Management Procedures Order and would not be able to make the necessary budget savings associated with reducing the level of neighbour consultation letters and providing a better and more efficient self service

**Background information**

**The SCI review**

4.6 The first SCI document was adopted by Haringey in 2008. Various changes in legislation have occurred since then. In 2008, the requirement to include the SCI in the Local Development Scheme (LDS) and for it to be submitted to the Secretary of State for examination were removed. Furthermore, the Localism Act introduced in 2011 has resulted in a streamlining of plan preparation as well as a number of other relevant changes.



## Haringey Council

- 4.7 In recognition of these reforms, the Government published revised Local Planning Regulations in 2012. These introduced further changes justifying this update of the SCI document. In particular, this relates to a simplified plan preparation process with fewer formal stages and faster working methods with regard to consultation and engagement requirements and the increases use and availability of electronic communications such as email and the web.
- 4.8 Other recent statutory changes include the following:
- The Localism Act (2011) which places a 'duty to co-operate' on all local authorities and a number of other public bodies. It requires on-going, constructive and effective engagement on matters of strategic cross-boundary significance in plan making.
  - Neighbourhood Planning (General) Regulations 2012, which provide the opportunity for community groups (as designated neighbourhood forums) to prepare their own neighbourhood plans;
  - Community Infrastructure Levy Regulations (CIL), April 2010 (and subsequent amendments), which set out the provisions for CIL, the procedures and the bodies to be consulted during the preparation of a CIL;
  - The Town and Country Planning (Development Management Procedure) (England) Order 2015, which consolidates the amendments made by the Town and Country Planning (Development Management Procedure) (England) Order 2010 and subsequent amending instruments and revokes, in full or in part, a number of other the instruments. This includes setting out the statutory provisions for consultation on planning applications, and specifies the bodies to be consulted, depending on the type of planning application;
  - The Town and Country Planning (General Permitted Development) Order 2015, which sets out the requirements for statutory consultation on adjacent premises regarding prior approvals for householder extensions.
- 4.9 This review of the SCI takes on board these new changes and requirements.
- 4.10 At the local policy level the draft SCI reflects the proposed 2015 Local Development Scheme, which is to be amended as a consequence of the preparation of Haringey's new draft Local Plan documents. Most notable is the inclusion of proposed Area Actions Plans for Tottenham and Wood Green and a proposed Highgate Neighbourhood plan, which were not envisaged when the SCI was first adopted.



## Haringey Council

4.11 The proposed update to the SCI has also provided Haringey with the opportunity to improve its approaches to Development Management in order to reflect 'best practice' and consultation work on planning applications and to take on board the work of the Environment and Housing Scrutiny Panel to assess how planning services involved local residents and engaged local communities during 2013. In July 2014, the Council adopted an internal Planning Protocol following approval at Regulatory Committee, which set arrangements for Development Management and established the Council's move to self-service and paperless systems which was signalled in the previous SCI. These, along with the results of the recent statutory changes and a commitment to effective engagement including the use of new media/technology where appropriate, have resulted in the following key updates for Development Management:

- Using the existing Development Management Forum to consider some major planning applications, at the pre-application stage (rather than during the application process) and introduction of pre-application briefings for the planning sub-committee;
- Review of the charged pre application service including the introduction of a charged householder pre-application service and early construction advice together with a discounted service for small businesses;
- A new Quality Review Panel to replace the Design Review Panel;
- A move towards using new media (when the technology becomes fully developed) to help reduce and eventually remove the need for posted neighbour notification letters using site notices instead for all applications and the introduction email/SMS notification of applications in their area.

### Proposed Consultation

4.12 The Council is proposing to consult on the draft SCI for 8 weeks from Cabinet approval. Following the removal in the 2008 Planning Act of the requirement for the SCI to be submitted to the Secretary of State for examination, Haringey's SCI will not be publicly examined. Following the 8 weeks consultation, it is the intention to consider all responses to the SCI, bring a report back to Cabinet to amend the document where appropriate and to formally adopt the SCI.

### Prioritisation and Resource Implications

4.13 The preparation of the SCI is a statutory requirement.

4.14 The costs of preparing SCI will be met within existing budget commitments.



**Haringey Council**

## **5 Next Steps**

5.1 Below is a timetable setting out the progress of this document:.

<b>Task</b>	<b>Completion Date</b>
Cabinet approval to consult on the Draft SCI	14 July 2015
Consultation Period	July to September 2015
Adoption	Late 2015/ Early 2016

5.2 The public consultation on the SCI is scheduled to begin in July and will run for an 8 week period to take account of the summer period.

5.3 The consultation will be for eight weeks and will meet all the statutory requirements of the regulations.

## **6 Comments of the Chief Finance Officer and financial implication**

6.1 The cost of preparing this report, the documents it refers to and the consultation recommended can be contained within existing budgets.

## **7 Comments of the Assistant Director of Corporate Governance and legal implications**

7.1 The Assistant Director of Corporate Governance has been consulted on the preparation of this report and comments as follows.

7.2 Local Planning Authorities are required by virtue of s18 of the Planning and Compulsory Purchase Act 2004 to prepare a Statement of Community Involvement which should explain how they will engage local communities and other interested parties in producing their Local Plan and determining planning applications.

7.3 There is a process, set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, associated with the preparation of, consultation on and adoption of a Statement of Community Involvement.

7.4 It is clear that there have been significant changes in legislation, policy and guidance since the adoption of the last iteration of the Council's Statement of Community Involvement to require and justify the suggested update of and revision thereto.

7.5 The Statement of Community Involvement should, when adopted, be published on the Council's website



**Haringey Council**

## **8 Equalities and Community Cohesion Comments**

8.1 The Council has a public sector equality duty under the Equalities Act (2010) to have due regard to:

- tackle discrimination and victimisation of persons that share the characteristics protected under S4 of the Act. These include the characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex (formerly gender) and sexual orientation;
- advance equality of opportunity between people who share those protected characteristics and people who do not;
- foster good relations between people who share those characteristics and people who do not.

8.2 The SCI sets out the stages of preparing a Development Plan Document (section 2.2 in the draft). An initial screening for the Equality Impact Assessment should take place at an early stage. Equality considerations should inform both (i) the blomalidesign/substance of the draft plan and (ii) how the consultation process on the draft is carried out. The assessment should identify any mitigating measures which need to be put in place.

8.3 The draft SCI outlines a good range of measures which aim to increase the inclusivity of Development Plan consultations. Future EqlAs surrounding draft development plans should reference how the list of measures contained in the SCI would be deployed in the specific circumstances to advance equality, tackle discrimination and promote community cohesion.

## **9 Head of Procurement Comments**

9.1 Not applicable.

## **10 Policy Implication**

10.1 Haringey's Corporate Plan sets out the Council's strategic direction from 2015 to 2018. With the vision of 'Building a Stronger Haringey Together, the Corporate Plan guides the work of all Council programmes. The overarching theme is that everyone who lives in Haringey will have the opportunity to lead a successful and fulfilling life.



## **Haringey Council**

- 10.2 The Corporate Plan 2015-18 explains the priorities for the borough, and how the Council will achieve these priorities. The overall approach is to encourage investment in the borough to create more opportunities. The emerging SCI will help achieve all the priorities of the Corporate Plan by ensuring we work with our communities, as a team, with everyone who has an interest in our community to improve our neighbourhoods and increase skills and capacity around local problem solving. The SCI will encourage community participation, signposts local resources and connects skills and willingness with where it can really make a difference.
- 10.3 The SCI is therefore consistent with the existing Corporate Plan and the emerging Corporate Plan.

## **11 Reasons for seeking Cabinet approval**

- 11.1 Section 18 of the Planning and Compulsory Purchase Act (2004) requires local planning authorities to prepare a Statement of Community Involvement (SCI). The SCI must set out how persons who appear to the authority to have an interest in matters relating to development in the area will be involved in the authority's plan making and development management functions. Haringey's SCI is out of date and therefore needs updating following a statutory consultation period.

## **12 Use of Appendices**

- Appendix 1 – The Draft Statement of Community Involvement

## **13 Local Government (Access to Information) Act 1985**

- 13.1 The following documents were used in the preparation of this report:

- Haringey SCI 2008 (Updated 2011)
- The National Planning Policy Framework 2012
- The Localism Act 2011



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# Haringey Statement of Community Involvement

Adopted 2008

Draft Update 2015



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## **1. INTRODUCTION**

### **1.1 What is the Statement of Community Involvement (SCI)?**

1.1.1 All local planning authorities are required under section 18(1) of the Planning and Compulsory Act 2004 to prepare and maintain a Statement of Community Involvement (SCI). The SCI sets out how Haringey Council's Planning Service will involve local residents, local businesses and other key organisations and stakeholders in the plan-making process and in the determination of planning applications.

### **1.2 Why is community involvement in planning important?**

1.2.1 The shops, services, transport infrastructure and parks we use, to the businesses where we work and the homes we live in, are all the result of planning policies and decisions. Planning is therefore integral to our neighbourhoods, and it's important that the local community and businesses become involved at an early stage and throughout the planning process to help inform how Haringey and the places within it might evolve and develop over time.

1.2.2 This statement therefore demonstrates the various ways that the Planning Service will engage with the community and businesses in both the plan-making process and in decisions on planning applications, and provides an explanation of the planning process and what happens if you decide to become involved. This statement also provides a benchmark against which compliance on planning consultations will be measured.

### **1.3 Review of the SCI**

1.3.1 Haringey's SCI was initially adopted in 2008. It was subsequently updated in 2011 and, four years on, requires a further update to take account of recent changes in planning legislation and to reflect current practises in community engagement, including greater use of electronic communications such as email and social media.

1.3.2 The recent changes stem mostly from the introduction of the Localism Act in late 2011, which sought to speed up both plan-making and the time taken to determine planning applications. In particular, it simplified the plan-making process by reducing the number of informal consultation stages and reduced the status of certain types of planning documents making them less onerous to produce or update.

1.3.3 At the same time, the Localism Act also introduced measures to shift new rights and planning powers to local authorities and local communities. These changes included a new duty on all planning bodies to cooperate on cross boundary planning matters, the ability to introduce a levy on development to help pay for local infrastructure, and the ability for local communities to prepare their own plan for their own local neighbourhood area.

## **2. THE PLANNING PROCESS**

## 2.1 The Plan-Making Process – Haringey’s Local Plan

2.1.1 It is a statutory requirement that the Council must prepare and maintain an up-to-date Local Plan to guide development in Haringey. The Local Plan is the name given to documents that have special legal status under the Planning Acts. They are known as 'Development Plan Documents' (DPDs) and planning decisions must be made in accordance with any relevant provisions contained within these DPDs, unless material considerations indicate otherwise.

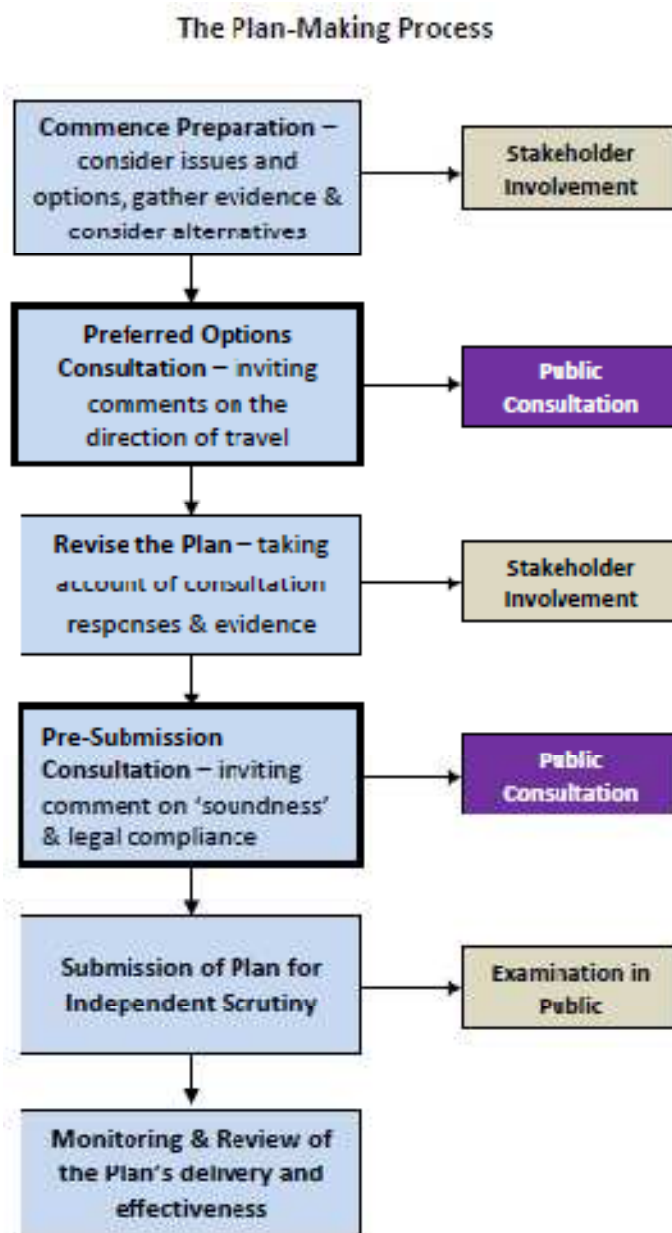
2.1.2 The Local Plan has a 15 year timeframe and comprises a strategic vision and objectives that set out the Council and community’s aspirations for Haringey's future. It also includes:

- strategic policies setting out where growth will go, and how the environment, open spaces and historic assets will be managed;
- detailed development management policies, which give specific guidance on all development issues such as quality and design standards;
- site allocations, which allocate strategic sites to help deliver the growth set out in strategic policies; and
- mechanisms for delivery and monitoring, to ensure that the plans are being implemented and are effective in managing growth and development.

2.1.3 The content of Haringey’s Local Plan must also be in general conformity with the policies of the National Planning Policy Framework (2012) and the London Plan (2015).

2.1.4 Although not sharing the same 'development plan' status as the Local Plan, there are also Supplementary Planning Documents (SPDs) on certain topics which add detail or contain further guidance on policies in the Local Plan. These documents do not contain policy themselves, but provide useful amplification and additional information for all involved in the planning process.

2.1.5 The process for creating Local Plan documents is shown above, highlighting the stages at which the Council will consult on the documents.



- 2.1.6 After a development plan document is adopted, following an independent examination in public, it will be monitored to ensure the plan is delivering on its objectives and to identify any unintended consequences of the plan. This may lead to it being reviewed and modified if the plan's objectives are not being achieved, or to address unexpected changes such as changes to national planning policy or revisions to the London Plan.
- 2.1.7 For more detail on how to get involved and comment on developing planning policy, please see Section 5: *How We Consult - Local Plans*.

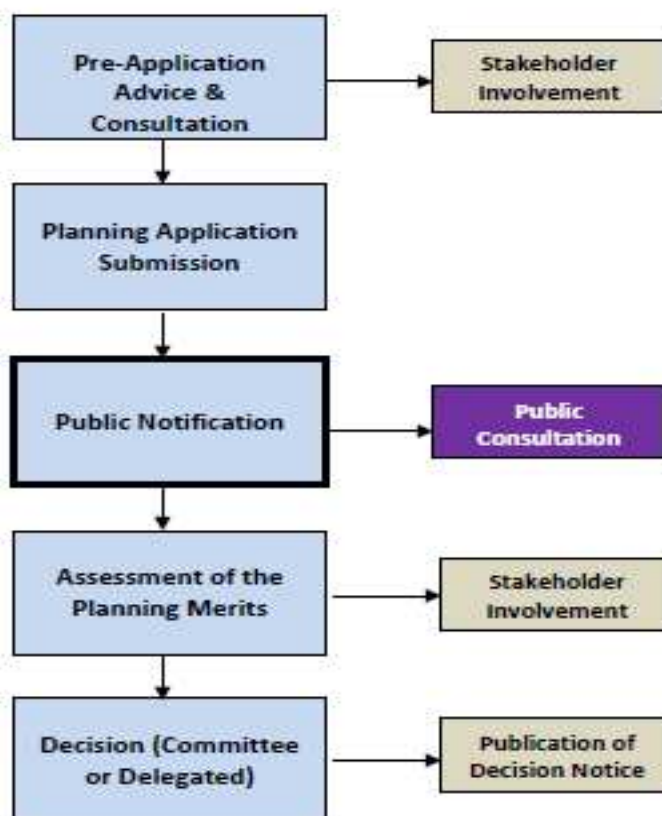
### Viewing the Local Plan

All Local Plan documents can be downloaded free of charge at [www.haringey.gov.uk/localplan](http://www.haringey.gov.uk/localplan). They are also available to view at the duty planner's office (River Park House, 225 High Road, Wood Green N22 8HQ). Printed copies of the documents may be purchased from the Council on request; for details of charges please e-mail [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk).

## 2.2 Planning Applications

- 2.2.1 The planning application process is set out in the diagram below. A planning application arises when permission is sought by someone (an individual, a group, a business, a public body) to use or develop land. Prior to submitting an application, proponents of a proposed development are strongly encouraged to discuss their proposal with likely affected parties, such as neighbours. For complex proposals, pre-application advice should be sought from the Council to ensure any subsequent application addresses the likely key considerations. Further information on pre-application advice and consultation is provided in Section 5 of this statement.

Planning Application Process



- 2.2.2 Once an application is submitted, Haringey Council is responsible for deciding whether planning permission should be granted or refused after considering the policies in the Local Plan, strategic priorities, advice from key stakeholders, representations from the local community, and any other relevant information.

- 2.2.3 Key stakeholders include relevant internal (such as the Highways Authority, drainage engineers, Council's ecologist) and external bodies (such as Sport England, Thames Water, Transport for London). The community can comprise both individuals and groups, many of whom command a wide range of professional and technical skills and have a detailed knowledge of the local area. Developers and other applicants are strongly encouraged to engage this resource at the earliest possible stage of the (proposed) development process. Other relevant information can include general



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evidence studies relating to housing need or employment land, as well as proposal specific studies such as Flood Risk Assessments and Transport Assessments.

2.2.4 For more detail on how to get comment on planning applications, please see Section 5: *How We Consult – Planning Applications*.

**Viewing Planning Applications**

To view planning applications and their associated documents including site plans please visit [www.haringey.gov.uk/planning](http://www.haringey.gov.uk/planning). You can view applications by the reference number given to them (as published on site notices and in notification letters) or by searching the property's post code. This will highlight all applications received in the vicinity.

### 3. CONSULTATION PRINCIPLES

3.1.1 We want our consultations to be as open and accessible as possible. Therefore this document outlines some key principles for effective engagement that we will apply to all our consultations. These principles reflect the Council-wide consultation principles contained in the Haringey COMPACT and those endorsed by the Supreme Court in its recent decision on consultation.

#### **Our Aims**

Haringey Planning Service will:

#### **Ensure consultation is Effective –**

- By being undertaken at the earliest possible stage in the decision-making process, when proposals are still at a formative stage and when there is scope to influence the outcome.
- By providing relevant information and sufficient reasons for any proposal to permit intelligent consideration and response by all affected parties.
- By targeting consultation to make sure that relevant stakeholders are involved.
- By ensuring the consultation methods used are appropriate in engaging affected parties.

#### **Ensure consultation is Transparent –**

- By ensuring the aims, purpose and scope of the consultation, and the issues involved, are clearly expressed.
- By being clear about how the consultation will be run, where information can be accessed and, as far as is possible, what can be expected after the consultation has formally closed.
- By being up front about any potential conflicts of interest and how these are to be appropriately managed to meet public expectations of integrity.
- By requiring all those connected with any proposal, including those commenting, to identify themselves and who they represent when taking part in public consultations.

#### **Ensure consultation is Proportional –**

- By ensuring the level of consultation undertaken and resources spent are proportionate to the scale and impact of the proposal.
- By ensuring affected parties have adequate time to consider and respond to the proposals.
- By promoting the use of electronic methods of communication to make participation easier and quicker.

#### **Ensure consultation is Inclusive –**

- By involving representatives of a cross-section of stakeholders, ensuring the different needs and views of different sections or groups of the community are considered.
- By utilising a wide range of consultation methods, ensuring that the consultation as a whole is accessible to all including those who are 'hard-to-reach' or are seldom heard.

#### **Ensure consultation findings are Accountable –**

- By publicising the responses and providing feedback to participants
- By explaining how the responses to consultation have or have not inform policy or the determination of a planning application.
- By linking to decision-making to robust, consistent and sound grounds.

#### **Ensure consultation material is Coherent –**

- By providing useful and clear summaries of the proposals and the main issues to be addressed.
- By ensuring consultation documents, including committee reports, are presented in an easy to read format and utilise 'plain English'.

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#### 4. ABOUT HARINGEY'S COMMUNITY

- 4.1.1 It is essential to understand the dynamics of our community in order to recognise the needs of the borough and the barriers that may arise during consultation, in order to effectively produce plans that are inclusive of everyone's views and to ensure people affected by plans and planning applications can voice their concerns.
- 4.1.2 Haringey's population was at 258,900 as of mid 2013 which was a rise of 3,300 since the census of 2011. The GLA projection figures predict that the number will significantly increase to 282,647 by 2020. Haringey accounts for 3.1% of London's population.
- 4.1.3 The borough has a higher proportion of young adults and a smaller proportion of older people compared to London figures.
- 4.1.4 As a result of these significant growth figures in Haringey's population there will be a great impact on housing and social infrastructure, such as health and education facilities, as well as on water and energy infrastructure. For example, Haringey will experience particularly high rise in school numbers to accommodate for the population growth.
- 4.1.5 The borough contains large and diverse black and ethnic minority communities. 65.3% of the Haringey population are made up of non-white British Ethnic Groups. This is higher than both London (55.1%) and England and Wales (19.5%).
- 4.1.6 There is great diversity in Haringey and our community involvement activities need to reflect this diversity and should aim to provide equal access to all. In particular, there are sectors within the community who traditionally may not have been involved in the planning system or who may find it difficult to engage with the planning system. There are a number of reasons why these 'hard to reach' groups find engagement in planning difficult including inaccessibility, language barriers, cultural perceptions, traditions or social expectations. To try and address these, the Planning Services will:

**Language barriers** – the diversity of language in the borough means that we will produce documents which are clear, concise, and are available in an electronic format capable of translation. More interactive community involvement activities will also be used such as visual displays and exhibitions.

**Children and young people** – we will seek to involve young people in decision-making on planning issues through use of more modern consultation tools, such as social media and the use of apps where appropriate.

**Low internet access** – access to the internet is not available to everyone. The methods selected for community involvement will continue to be a combination of online (e-planning) and offline facilities.

**Older People** – the Council will aim to involve older people and groups such as the Muswell Hill and Highgate Pensioners Group, and Age UK more effectively in decision making by creating stronger links with such groups in the borough. We will also use accessible venues and facilities and have documents available in accessible formats.

**Disabled people** - the Council will aim to involve people with disability and mobility issues more effectively in decision-making by creating stronger links with disability and mobility groups in the borough. We will also use accessible venues and facilities, and make documents available in accessible formats.

4.1.7 The Council recognises it cannot persuade everyone to get involved, or be able to take on board every comment received. We also recognise that some individuals, groups and businesses may have a greater capacity to get involved in planning matters than others and so where appropriate we will support those who find it difficult to get involved with planning issues. We have sought to be realistic about the community involvement activities proposed; recognising that there are limits to our resources and time constraints. The Council is committed to getting less actively engaged groups and individuals involved, and to support those who are already involved to support those who are not yet engaged or fully engaged. Appendix 1 identifies methods that will be used for the preparation and revision of Local Plan documents and are recommended to applicants of major or sensitive applications. Further information about these methods, including details of their benefits, limitations and resource implications are set out in Appendix 2.

## 5. CONSULTING THE COMMUNITY

### 5.1 Who We Consult – Local Plan-Making

5.1.1 The Planning Service consults a range of organisations during the process of preparing its Local Plan. Those who are consulted can be categorised into the following types of consultee:

Consultation Bodies	<b>Duty to Co-operate Bodies</b>	These are bodies that would be involved in cross boundary issues such as Neighbouring boroughs
	<b>Specific consultation bodies</b>	Statutory bodies such as adjoining boroughs and government agencies
	<b>General consultation bodies</b>	National and local community and voluntary groups, businesses and other stakeholders
	<b>Other Consultees</b>	Other groups which will be consulted on specific issues, some of whom are under-represented or hard to reach

5.1.2 **Duty to Co-operate Bodies** - The Localism Act 2011 places a 'duty to co-operate' on local planning authorities and neighbouring boroughs for any cross boundary issues. There is also a requirement for the Local Authority to co-operate with various public bodies for any cross boundary issues. These bodies play a key role in delivering local aspirations, and cooperation between them and local planning authorities is vital in order to make Local Plans as effective as possible on strategic cross boundary matters. The bodies should be proportionate in how they do this and tailor the degree of cooperation according to where they can maximise the effectiveness of plans. These bodies include:

- the Environment Agency
- Historic England
- Natural England
- the Mayor of London
- Civil Aviation Authority
- Homes and Communities Agency
- Clinical Commissioning Group
- National Health Service
- Office of Rail Regulation
- Transport for London
- Highways England
- Marine Management Organisation.
- Adjoining boroughs:
  - Barnet
  - Camden
  - Enfield
  - Hackney
  - Islington
  - Waltham Forest

5.1.3 **Specific Consultation Bodies** - The specific consultation bodies are groups that have expertise and knowledge in a particular subject. Many of the consultees in this list are also in the Duty to Co-operate list such as the Mayor of London. However this list is not exhaustive and may depend on the nature of the consultation. Examples are:

- The Mayor of London
- Natural England;
- The Environment Agency;

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- Historic England;
  - Highways Agency
  - Network Rail;
  - Mobile Operators Associations;
  - The NHS, PCT and CAAG
  - Gas and electricity operators;
  - Thames Water

**5.1.4 General Consultation Bodies** – which includes the following:

- Recognised voluntary bodies, active within the local area whose activities benefit any part of the Borough
- Recognised bodies which represent the interests of different racial, ethnic, or national groups in the Borough.
- Recognised bodies which represent the interests of different religious groups in the Borough
- Bodies which represent the interests of disabled persons in the Borough.
- Bodies which represent the interests of different age groups in the Borough
- Bodies which represent the interests of persons carrying out business in the Borough.

**5.1.5 Other Consultees** – this includes local representative bodies who are regularly consulted, when and where appropriate. The approach to consultation will be flexible, accessible and proactive, and the scale of consultation will be equal to the likely impact of the proposed plan. Notification material will be designed to be clear and concise, without any jargon. Type of engagement and consultation could include workshop style events, seminars, meetings, and interactive information stalls to encourage wide participation and engagement throughout the borough. Each event and meeting will be tailored to the specific focus group, discussing issues relevant to their interests and relevance to any proposals.

**5.1.6** In addition to the above, the Council also maintains a database of local individuals, organisations and businesses that have indicated they wish to be actively engaged in plan-making in Haringey. The database currently has over 1,000 consultees, and is continually updated. Everyone on the list is notified of any public consultation on any Local Plan document. Organisations, groups and individuals that wish to be added or deleted from the database can do so at any time by contacting the Local Plans team (See box below for details). This database includes specific consultation bodies, as prescribed in the Regulations, as well as individuals and groups who have previously responded to consultation on a particular planning document.

**Consultation Database - Be Included**

If you wish to receive notifications about future consultations on new town planning documents, please email [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk) or call 02084891479 or write to the Planning Policy Team, London Borough of Haringey, 225 High Road, London N22 8HQ to be added to our database or to have your details amended.

## **5.2 How We Consult - Local Plan-Making**

**5.2.1** In addition to contacting the above organisations and contacts on the consultation database about new consultations, the Council will also engage in the ways detailed below.

### *Haringey Council Committees and Ward Members*

**5.2.2** Local Plan documents are submitted to the Council's Regulatory Committee and Cabinet for comment and approval before being subject to public consultation. The



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Regulatory Committee can recommend changes to the document and is used to help guide the development of the plan before it is sent to Cabinet for approval for consultation. Full Council (all elected Councillors) approves the final versions of Local Plan documents for pre-submission consultation and submission to the Secretary of State for independent examination and for formal adoption.

### *Consultation Internally*

- 5.2.3 Planning Services consult widely with other Council departments when and where relevant to ensure the Local Plan reflects other Council initiatives and strategies, and that specialist feedback is incorporated where necessary.

### *External Consultation*

- 5.2.4 All Local Plan documents will be published for comment for at least a six week period. A number of different methods will be used to ensure that as wide a range of people and organisations are informed of the development of new plans for the Borough. These will include, as a minimum:

#### **Consultation Methods**

- Public Notice in the local press
- Notification emails / letters to consultees on the Planning Service's consultation database
- Notification letters to directly affected parties (i.e owners and occupiers of buildings and land with proposed site allocations)
- Notification via Council's online social media such as Blogs and social networks
- Plans and supporting information will be published on the Council's website and made available to view and on short-term loan in local libraries
- Public roadshows and Drop-in Sessions in areas affected by the plan at stage one of the statutory preparation process
- Presentations at meetings of stakeholders and interested parties' forums
- Summary information / web based guides on the key issues
- Consultation with key stakeholders as identified above

- 5.2.5 Other methods that may be utilised to ensure effective engagement include Forum Groups, Media Briefings, Community Surveys, Workshops, and Public Exhibitions, alongside any other relevant method of engagement (See Appendix 1). Efforts will be made to utilise online social networks and other e-tools to help publicise and improve engagement with us. Planning Services would welcome any suggestions as to how we can engage with you in a meaningful way. Any suggestions can be emailed to [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk) and will be considered for future events.

## **5.3 Consultation Results**

- 5.3.1 After the close of a consultation, the Local Plans team will consider the comments received and will prepare a revised Local Plan document. All responses will be made available online, alongside a consultation statement which will detail:
- Compliance with the Duty to Co-operate
  - Who was consulted and how they were consulted
  - A summary of the main issues raised from the comments
  - How the comments have been taken into account in the revised document
- 5.3.2 Where possible (resource dependent), a full schedule of comments with detailed officer responses will also be prepared.

## **5.4 Who We Consult – Planning Applications**

- 5.4.1 Planning applications arise when permission is sought by someone (an individual, groups, businesses, public authority) to change the use of or develop land. Haringey Council is responsible for deciding whether planning permission should be granted or refused after considering the policies in the Local Plan, strategic priorities and representations from the local community. The community can comprise both individuals and groups, many of whom command a wide range of professional and technical skills and have a detailed knowledge of the local area. Developers and other applicants are strongly encouraged to tap into this resource at the earliest possible stage of the (proposed) development process.
- 5.4.2 The most common applications the Council considers and the target timescale for their determination is set out in the table 5.1 below:
- 5.4.3 The nature of the application will decide who will be consulted. Appendix 3 set out the guidelines for who needs to be consulted on particular applications and how.
- 5.4.4 Applicants of major schemes are advised to undertake early community involvement before submitting an application to the Council. It is the responsibility of the applicant to conduct pre-application community involvement. For major applications the Council will discuss with the applicant the potential for taking the proposal to a development management forum at the pre-application stage. With applications submitted to the Council, interested people will have the opportunity to know what proposals are in their area, be consulted on them and find out about decisions. The comments received during the application stage will be taken into account when making a decision. Planning decisions are made in accordance with the development plan and taking into account relevant material considerations such as impact on local amenity, impact on transport and social infrastructure. An application that has numerous objections may still be approved and similarly one with no objections may still be refused.

**Table 5.1: Types of Planning Applications**

<b>Application Category</b>	<b>Development Type</b>	<b>Thresholds</b>	<b>Target Timescale</b>
<b>Major Applications</b>	Residential	10 or more units	13 weeks unless subject to an agreed extension of time or Planning Performance Agreement
		0.5 hectares site area	
	Non-Residential	1000m <sup>2</sup> or more floorspace	
		1 hectare or more site area	
	Change of Use		
	Waste		
	Approval of Details		
Variations of Permission			
<b>Minor Applications</b>	Residential	1 to 9 new units	8 weeks
	Non-Residential	Less than 1000m <sup>2</sup> of floorspace	
		Less than 1 hectare in site area	
		Alternations within the cartilage of non-residential properties	
	Change of Use (CoU)	Any CoU or conversion not within the above major categories	
Variations of Permission	Involving building works within the above minor categories		
<b>Other</b>	Change of Use	Any CoU or conversion not within the above major or minor categories	8 weeks
	Special Consents	Advertisement consent	
		Certificate of lawfulness applications	
		Listed building consent applications	
		Conservation area consent applications	
		Tree preservation orders	
	Prior approval notifications	48 Working days	
Variations of permission	Involving CoU not within the above major or minor categories	8 weeks	
<b>Householder</b>	Householder development	Any householder extensions /alterations	8 weeks
		Any householder outbuildings/garages	
		Any householder hardstandings/vehicular accesses	
		Any householder swimming pools, walls, fences	
		Satellite dishes on domestic properties	

## 5.5 How We Consult – Planning Applications

5.5.1 The Council must make decisions on all valid planning applications received. These range from simple house extensions to new office developments, retail stores to large housing developments. The Council also determines applications affecting

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listed buildings, and for works to protected trees. Whilst these follow their own procedures, they still require the same level of consultation as any other application.

- 5.5.2 Local authorities are required to publish details of all planning applications. Every week, the Council publishes a list on its website summarising all planning applications validated. This list sets out for each application: site name and address; nature of proposal and the name of the Planning Officer that will be dealing with the application. This list is posted on the Council's website <http://www.haringey.gov.uk/housing-and-planning/planning/planning-applications/current-planning-applications/view-and-comment-current-applications/planning-application-lists>. Certain types of planning application are also publicised in the local newspaper.

#### **Notification**

We will use a combination of the following methods to notify the community about planning applications:

- Site Notices and / or letters to adjoining properties (or surrounding area for major proposals)
- Council's website will contain all the application details and plans
- Publication of weekly list of applications
- Press Notice (for major applications, listed buildings and planning applications in a conservation area)

### **5.6 Pre-Application Advice**

- 5.6.1 Charged pre-application discussions are available to applicants and are intended to provide specific planning advice concerning the development of a particular site and provide greater clarity to the applicant by identifying planning issues and requirements before the application is submitted.
- 5.6.2 Applicants are advised to come to a discussion meeting with adequate information in the form of site plans and photographs in order to be able to describe in reasonable detail the context surrounding the proposal.
- 5.6.3 For major schemes relevant teams within the Planning Service (Design and Conservation, Strategic Sites, Transport and the relevant policy officer from Planning Policy) will have input into discussions as necessary.
- 5.6.4 Where appropriate, all Major Applications for residential and non-residential development should be considered by the Quality Review Panel at pre-application stage alongside sensitive proposals, such as a development adjacent to public open space or listed buildings; and, occasionally, other applications which officers feel will benefit from the expert design advice, could be brought to the Panel's attention with the agreement of the Head of Development Management. The charge for this service is set out on the Council's website.
- 5.6.5 For further details on Council's pre-application service, please visit <http://www.haringey.gov.uk/housing-and-planning/planning/planning-applications/pre-application-guidance>

### **5.7 Pre-Application Consultation**

- 5.7.1 It is the responsibility of applicants of major schemes to undertake early community involvement before applying for planning permission. The Council will recommend that this is undertaken. The Council will recommend the use of community involvement methods set out in paragraph Appendix 2. We also recommend that applicants follow the procedure below:
- (a) As early as possible, and where appropriate, applicants should discuss

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their community involvement programme together with the Council. This will help make sure that the involvement process is suitable, identifies relevant consultees and is in line with the SCI. It is the responsibility of applicants to design and plan their own community involvement strategy as they think fit, but mindful of the standards set out in the SCI.

- (b) Whilst applicants carry out the community involvement activity, Council officers will recommend suitable community involvement methods.
- (c) After the community involvement activities have been undertaken and as part of the application process applicants should submit a Consultation Statement (CS) with the planning application. This should summarise the type of consultation that was organised, the key issues raised and details of how the scheme addressed those issues.
- (d) In accordance with the Planning Protocol 2014 most major applications will be required to be presented at a Development Management Forum and to a pre-application briefing of the Planning Sub Committee. Where a Development Management Forum takes place the Council will put up site notices and send emails to local groups and councillors advising them of a proposed meeting. Details of Planning Sub Committee briefings will be available on the Council's website.

5.7.2 There are many benefits associated with pre-application community involvement. It provides the local community and other stakeholders with the opportunity to let applicants know what they think, and influence proposals right from the outset. Applicants too can benefit from local advice and intelligence so that what is proposed is the right development, in the right place, at the time. Hence, the pre-application involvement will, where appropriate, be encouraged for schemes other than major ones, if the Council consider that they are likely to be contentious.

5.7.3 If during the pre-application stage an applicant of a major scheme has involved and consulted with the community in a manner the Council disagrees with we cannot however refuse to consider a valid planning application. However, if an applicant fails to involve and consult the community on a major scheme this could give rise to objections being made, which could be taken into account when determining the proposal.

#### **Developer Consultation Requirements**

The Council expects developers to meeting the following pre-application consultation requirements as a minimum:

- Public Notice or press release in the local press
- Notification letters to directly affected parties (i.e. owners and occupiers of buildings and land within the vicinity of the proposed development site)
- Leaflet drops and posters
- Public meetings, including Exhibitions, Displays, Workshops & Focus Groups in a suitable location and at suitable times of day

### **5.8 Submitting a Planning Application**

5.8.1 When a planning application (major, minor or householder application) is submitted to the Council the details of the application will be entered on to the Statutory Register of Applications. This is available for inspection on the Council's website.

5.8.2 As appropriate, applicants of major schemes should also include the relevant documentation needed to assess the application such as existing and proposed drawings, site plan, Design Statement, Travel/Transport Statement and /or Plan, Design and Access, Statement and Energy Statement. Details of the Council's information requirements which applicants and agents are expected to provide

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with their application is available on the Council website.

- 5.8.3 Applicants of major schemes should also provide a Consultation Statement of any pre-application consultation undertaken and how they have taken account of the comments made by the community, and how the comments have helped shape the application.
- 5.8.4 All planning applications once submitted will be subject to public consultation. Anyone can make comments on planning applications regardless of whether they are directly affected or not. Comments must be made within 21 days from the date of the notification. Bodies such as Natural England will be allowed a longer period of time to comment on applications where this is prescribed by legislation. All comments and written representations are taken into account when the planning application is considered.
- 5.8.5 The Council will consult with any statutory body required in accordance the Development Management Procedure Order 2015. Adjoining Borough Councils will be notified if the site is near a Borough boundary and is likely to affect the neighbouring Borough.

### Consultation Methods

- All applications and supporting documents will be published online
- A newspaper advertisement will be published as required by statute
- Site notice or notification letters to residents will be issued

- 5.8.6 The process for submitting comments on applications is necessarily formal, given the need to determine applications in a timely manner. Therefore the following requirements apply to anyone wishing to comment on an application:
- All comments must be received in writing within the consultation period (normally 21 days)
  - Comments can be submitted by email, letter or online using the appropriate form
  - Late comments will be considered where circumstances allow
- 5.8.7 To submit comments online you must first search for the application at the address above, and then click the 'View Details' tab. From here there is a 'comments' tab that can be used to submit your representations. Please note that only material Planning Considerations will be taken into account, such as Local Plan policies compliance, and other site specific issues such as overlooking, transport problems, layout and design, amongst many others.
- 5.8.8 The determination of planning applications is a transparent, public process. Therefore representations made on planning applications will be made available to members of the public to view alongside all other application material and are included in the Council's report on the application. Where requests are made to withhold addresses these will be considered however anonymous representations on local amenity issues will not hold as much weight as ones where locations can be identified and impact assessed.

## 5.9 Changes to proposals after the application has been submitted

- 5.9.1 While there is no legal requirement to allow for amendments to submitted planning applications, or to re-consult neighbours on the change proposed, the National Planning Policy Framework encourages local planning authorities to work with applicants in a positive way. Where the Local Planning Authority accepts material amendments to a live application (noting that in most instances changes are made to



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meet objections), the Council will consider the following before deciding whether to reconsult:

- Were the earlier objections substantial?
- Are the changes significant?
- Did the earlier views cover the matters now under consideration?
- Do the changes mean others not previously consulted might now be concerned?

5.9.2 The period for re-consultation responses will be shorter than the initial 21 days, usually it will be 14 days.

## **5.10 Negotiations with the applicant**

5.10.1 The Council will negotiate with the applicant as appropriate so that a scheme is more acceptable in planning terms. Small amendments in order to make an application acceptable are likely to be negotiated although larger amendments are usually resisted.

## **5.11 The Decision**

5.11.1 After the statutory consultation period (21 days) has ended, the officer in charge of the case will make a recommendation to either grant or refuse the application. The final decision will be made in accordance with Haringey Council's scheme of delegation. The vast majority of planning applications (90%) are dealt with by officers under delegated powers. Major applications recommended for approval and applications where the Council is the applicant are determined by Planning Committee.

5.11.2 The Planning Sub-Committee is made up of elected Councillors and meets regularly throughout the year so that the committee can decide whether to grant or refuse planning permission.

5.11.3 During the Committee meeting Members consider:

- Planning application reports, which are made public five working days before the meeting.
- Planning officers' presentation describing relevant characteristics of the sites, the proposed scheme, material planning considerations and any addendum to the Planning Application report.
- Representations from those who have made arrangements to speak.

5.11.4 Further details on how to attend a Planning Sub Committee meeting are available on the website [http://www.haringey.gov.uk/index/housing\\_and\\_planning/planning-mainpage/applications/planning\\_sub\\_committee.htm#presentingviews](http://www.haringey.gov.uk/index/housing_and_planning/planning-mainpage/applications/planning_sub_committee.htm#presentingviews)

## **5.12 Councillor Involvement**

5.12.1 The meetings of the Planning Sub-Committee are open to the public so that anybody can hear the discussion on planning applications. Members of the Committee make decisions on planning applications taking into consideration the advice of the officers. The officer's report includes a recommendation to the Committee, whether to grant or refuse permission, but the Committee's decision is not bound by the recommendation.

5.12.2 The Planning Committee must make its decision based on all of the information available to it and, therefore, Members of the Committee are duty bound not to pre-determine applications in advance of the Planning Committee meeting and any relevant Member interests in a proposal must be declared in accordance with Council procedures.

5.12.3 Where a Committee application is recommended for grant there is a scheme in place to allow 2 objectors to make verbal representation (for up to three minutes each) regarding the proposal at the Committee meeting.

### **5.13 Where We Won't Consult**

5.13.1 Planning Services will not consult on the following types of applications:

- Certificate of lawfulness of proposed use or development
- Certificate of lawfulness of existing use or development
- Details pursuant to conditions
- Non-material minor amendment applications

5.13.2 This is because they are assessed against legal tests set out in planning legislation. There is no scope to take into account representations when making the decision on these types of applications.

### **5.14 Publicising Decisions**

5.14.1 Everyone who makes a comment on a planning application that is to be determined by committee will be advised of the date of the planning committee. Delegated and committee decisions are included on the 'Planning Decisions List on the Council's website. If the application is refused, and an appeal against this decision is lodged with the Planning Inspectorate, all those who made a representation to the refused application will be advised in writing of the appeal and the process the appeal will follow, including information on how they can participate in the appeal.

## 6. LOCALISM AND NEIGHBOURHOOD PLANS

6.1.1 The Localism Act, which received Royal Assent on 15th November 2011, introduced new rights and powers to allow local communities to shape new development by preparing a neighbourhood plan. In areas such as Haringey, where there are no town or parish councils, the Act allows neighbourhood planning to be taken forward by 'neighbourhood forums' composed of local community groups. These forums have the power to prepare neighbourhood development plans, that must be in general conformity with the strategic policies of the Local Plan, to be put to the wider community for approval by means of local referendum. It is the Council's role to agree the neighbourhood forum for the neighbourhood area and to help publicise and organise a referendum and examination of the neighbourhood plan. For more information on neighbourhood planning, including information on how to set up a neighbourhood forum and start preparing a neighbourhood plan, please visit the following websites:

<http://www.planningportal.gov.uk/inyourarea/neighbourhood/>  
<http://www.gov.uk/government/publications/localism-act-2011-overview>

### 6.2 What the Council Will Do

6.2.1 The Council will sit on the forum steering group to co-ordinate the fulfilment of its functions in relation to the establishment of any neighbourhood forum and the preparation of any neighbourhood plan. This will involve a ward Councillor, and relevant Council officers who will liaise with the forum, and advise on the extent of the neighbourhood plan area and matters of conformity with the Borough's Local Plan.

6.2.2 Once the plan has been developed and consulted on by the community, it will be submitted to the Council, and the Council will check it to ensure due process has been followed in accordance with the Localism Act 2011. If this is found to be so, the Council will organise an independent examination of the document in collaboration with the forum.

#### **Examination Support**

The Council will facilitate community involvement in the examination process by:

- Publicising the Examination dates in the local press
- Providing a web page with all relevant information on it
- Organise the Examination venue
- Make available key documents at accessible locations in the area affected e.g. libraries

6.2.3 If the document is approved by the independent examiner and the Council agrees, it will be subject to a referendum by the community / businesses affected. This will be co-ordinated by the Council and will normally be open to anyone eligible to vote in the area, but this may be extended by recommendation of the examiner if certain policies are seen to have implications on certain groups / communities.

**Referendum Support**

- To facilitate full participation in the referendum process the Council will:
- Advertise the referendum in the local press
- Place all content and information on the Council's website and, where possible and appropriate, use new online social media such as Blogs or social networks
- Dispatch notification emails / letters to affected residents / businesses
- Facilitate meetings with interested parties to ensure that the referendum is understood
- Provide summary information / web based guides on the key issues

6.2.4 The Council will publicise the referendum in accordance with the referendum regulations as run by the Council's electoral department, and will also help the forums contact interest groups, statutory bodies and other societies to aid in successful consultations.

6.2.5 It should be noted however that in developing a Neighbourhood Plan, most of the responsibility for consulting the community affected falls to the Neighbourhood Forum. It will be expected that the forum will undertake consultations broadly similar to that outlined in section 5: *How We Consult - Local Plans*. Further guidance on how to undertake consultations may be given by the Council, but the onus and costs (excluding the examination and referendum) must be borne by the forum.

6.2.6 For further details and support, it is recommended that you contact Planning Aid (or any subsequent replacement service), who may be able to offer financial assistance and guidance in developing a neighbourhood plan [www.rtpi.org/planningaid](http://www.rtpi.org/planningaid). The Council's Planning Service may also offer further guidance, and can be contacted in the first instance.

## **7. REVIEWING THE STATEMENT OF COMMUNITY INVOLVEMENT**

- 7.1.1 The Statement of Community Involvement will be reviewed and updated, as necessary, in order to deliver more effective consultation and in line with any changes in legislation and planning law. Consultation and engagement processes and techniques will be checked and updated to ensure wide involvement of local residents, businesses, voluntary organisations and individuals. Any gaps in information in the SCI will be identified in the Annual Monitoring Report (AMR). The AMR monitors the effectiveness of the policies in the Local Plan and assesses if it is achieving the desired results. The AMR will identify any need for revision of policy, which will be carried out in conjunction with public consultation and relevant bodies.

**Appendix 1: Community Involvement Methods**

<b>Community involvement methods</b>	<b>Planning process</b>
<b>Information by letter (available in different formats)</b>	Development Plan Documents Supplementary Planning Documents Planning Applications unless a site notice has been posted or an email sent
<b>Public Exhibitions/ Open Days/Road Shows</b>	Development Plan Documents Supplementary Planning Documents General awareness on planning Major Planning Applications (by developers)
<b>Council websites (the internal website (Harinet) and the public website, and the Council's consultation calendar)</b>	Development Plan Documents Supplementary Planning Documents All Planning Applications
<b>Council Magazines and Publications e.g. 'Haringey People'</b>	Development Plan Documents Supplementary Planning Documents
<b>Leaflets, Newsletters (available in different formats)</b>	Development Plan Documents Supplementary Planning Documents Major Planning Applications (by developers)
<b>Local press briefing and public notices</b>	Development Plan Documents Supplementary Planning Documents Planning Applications as required by
<b>Consultative documents requesting public comments</b>	Development Plan Documents Supplementary Planning Documents Major Planning Applications (by developers)
<b>Public meetings with displays</b>	Development Plan Documents Supplementary Planning Documents Major Planning Applications (by developers)
<b>Workshops and seminars</b>	Development Plan Documents Supplementary Planning Documents General awareness on planning Major Planning Applications (by developers)
<b>Surveys/ Questionnaires (available in different formats)</b>	Development Plan Documents Supplementary Planning Documents
<b>Focus groups and discussions</b>	Development Plan Documents Supplementary Planning Documents
<b>User panels and representative groups e.g. Quality Review Panel, Conservation Area Advisory Committee (CAAC),</b>	Development Plan Documents Supplementary Planning Documents Most Major Planning Applications or Applications within Conservation Areas as recommended by officers



**Participatory forums/Community forum  
e.g. DM Forum, Stakeholders Forum, HSP  
Forums**

Development Plan Documents  
Most Major Planning Applications  
as recommended by officers

<b>Community involvement methods</b>	<b>Planning process</b>
<b>Planning for Real (PFR)/ Workshops</b>	Development Plan Documents Supplementary Planning Documents Major Planning Applications (by developers)
<b>Social Media</b>	Development Plan Documents Supplementary Planning Documents Most Major applications as recommended by Officers

**Appendix 2: Potential Methods for Community Involvement**

<b>Method</b>	<b>Advantages</b>	<b>Disadvantages</b>	<b>Costs involved</b>
<b>Letters to statutory bodies and individuals (available in different formats on request)</b>	Can reach a wide audience of people as it is relatively inexpensive. Can be used to invite views and explain the Council's view and rationale for a certain position.	May not reach those with reading difficulties.	Inexpensive
<b>Public Exhibitions/ Open Days/Road Shows</b>	Opportunity to inform people about proposals and projects. Options can be clearly set out and presented all at once. Exhibitions can be moved between locations for maximum targeting. Can be used to generate feedback on a topic.	May only reach audience with interest in the topic. Information flow is largely one-way, though feedback can be requested (e.g. book to record comments, self-administered questionnaires).	Inexpensive - cost of hiring the venue, and staff time setting up the exhibition.
<b>Council websites (the internal website (Harinet) and the public website)</b>	Economical. Easy means of referring people to information in a short period of time.	Extent of internet access in the borough will be an issue.	Negligible
<b>Council Magazines and Publications e.g. 'Haringey People'</b>	Reaches a wide range of residents and is economical. Useful when needing to broadcast information and give people an opportunity to respond.	Extent of readership may be limited. May not reach non-residents of the borough.	Inexpensive or negligible
<b>Leaflets, Newsletters (available in different formats on request)</b>	Coverage is potentially wide, reaching residents and non-residents. Can be used to invite views. Can be high profile publicity.	Can generally give limited information. May deliver a poor response. Information flow is largely one-way, although can inspire debate amongst residents. May not reach those with reading difficulties.	Inexpensive, but requires skilled handling.
<b>Local press briefing and public notices</b>	Information can be provided in some detail. Economical	Not definite that a story will get in the press. May not reach those with	Moderate

Method	Advantages	Disadvantages	Costs involved
		reading difficulties.	
<b>Consultative documents requesting public comments</b>	Clear statement of purpose and reasoning should be apparent. Anyone can respond. Amenable to process on the web.	Relies on initiative of responders. Responses not likely to be representative of all opinion/interests. Can be hijacked by dominant and more resourceful individuals and organisations. May not reach those with reading difficulties.	Moderate/expensive - costs of publishing the documentation and administering the distribution and feedback process. Costs reduced if the process is done on the web.
<b>Public meetings with displays</b>	Combines the advantages of exhibitions with more informed discussion and opportunity to comment. Involves, informs and empowers the local community. Can involve different language groups using interpreters.	Relies on those who attend to comment, and hence can sometimes be unrepresentative. May only attract those with negative views. Many do not feel able to participate, as can be hijacked by more dominant and resourceful individuals. Size is limited by venue	Moderate
<b>Workshops and seminars</b>	Opportunity for stakeholders to make their opinion heard in a public debate. Encourages active citizenship. Encourages participants to develop a stronger and more relaxed working relationship. Can involve different language groups using interpreters.	Depends on stakeholders to take part.	Moderate - cost of hiring appropriate facilities for period of the workshop.
<b>Surveys/ Questionnaires (available in different formats on request)</b>	Good sampling technique should ensure that all shades of opinion are canvassed and captured. Can be geographically focused in terms of neighbourhoods, town	Can appear to be remote; while it captures public opinion, it does not necessarily capture opinion or the interests of	Moderate - skilled exercise which should be undertaken by trained staff or professionals. Can be

Method	Advantages	Disadvantages	Costs involved
	centres, and open space. Can be used to reach particular target groups.	institutions, corporate bodies and developers etc. May not reach those with reading difficulties.	inexpensive or moderately expensive.
<b>Focus groups and discussions</b>	A participatory approach, which can explore views on specific issues. A two-way process which gives clear encouragement to contribute ideas and views. Can be used to reach a target audience and those that do not respond to traditional forms of consultation. An opportunity to explore the factors which support an individual's opinion. Good for sensitive subjects where individuals may not respond to a structured questionnaire/group discussion. Can involve different language groups using interpreters.	Can be very time-consuming, and relies on good-will of respondents. Ultimately the group's views are only as representative as the group itself, i.e. selection of the group is very important. Cannot be used to extrapolate results for the whole population. Requires skilful facilitation.	Moderate - more costly if data is examined by a Consultant
<b>User panels and representative groups (VS) e.g. Quality ReviewPanel, Conservation Area Advisory Committee (CAAC),</b>	Provides a platform that is stable, can be very knowledgeable (representative groups) and gives a sense of involvement. Can be used to address more technically complex issues.	Where volunteers are being used, there is a need for frequent replacement.	Inexpensive/ Moderate
<b>Participatory forums/Community forum e.g. DM Forum, Stakeholders Forum, HSP Forums</b>	Provides the opportunity for participation in the process and procedures of planning. Strong two-way process.	Strong personalities may dominate proceedings.	Moderate
<b>Planning for Real (PFR)/ Workshops</b>	Involves, empowers and informs respondents – provides a degree of local	Structured approaches of PFR may limit its	Moderate/Expensive

Method	Advantages	Disadvantages	Costs involved
	ownership. Available as a tailored package, and easy to initiate. Takes respondents through the physical planning process and enables the visualisation of options. Can catch a wide range of participants. Can involve different language groups using interpreters.	usefulness for some situations. Needs planning, administration, time, and resources.	
<b>External Consultants</b>	Can provide specialised and focused facilitation for engagement events. This can allow for new and innovative engagement techniques to which participants respond more constructively.	May play a limited role in the consultation process and a very specific approach may not fit with the consultation aims.	Expensive.
<b>Councillor and MP surgeries</b>	Local residents and groups have access to elected representatives.	There may be some disappointment as it is not always possible for Councillors and MPs to intervene in the planning system in the way that their constituents might want because they must operate within the confines of planning law/policy.	Free
<b>Local amenity, tenant and other groups</b>	They have a wealth of local knowledge and play a vital role in expressing the concerns or needs of the local community.	They do not necessarily speak for all of the community as there is often more than one view on a development or proposed plan.	Free



**Appendix 3: Consultation policy – neighbour notification<sup>3</sup>****General Household Developments**

<b>Rear extension</b>	Site notice or All adjacent properties and affected properties to the rear
<b>Rear roof extension</b>	Site notice or All adjacent properties and 3 properties to rear
<b>Front roof extension</b>	Site notice or All adjacent properties and properties directly opposite to the front
<b>Material alterations to front elevation</b>	Site notice or All adjacent properties and properties directly opposite to the front
<b>Erection of domestic garage to front</b>	Site notice or All adjacent properties and properties directly opposite to the front
<b>Erection of boundary fencing</b>	Site notice or Adjoining properties
<b>Crossovers</b>	Site notice or Adjacent properties
<b>Erection of garden sheds, covered</b>	Site notice or Adjacent properties and all properties abutting the site

**Residential Development**

<b>Conversions</b>	<b>All conversions</b>	Site notice or Application property, all adjacent properties and 3 properties at the front and back
	<b>Conversions involving alterations to front elevation</b>	Site notice or All Adjacent properties and properties directly opposite to the front
	<b>Conversions involving rear alterations/ground floor extensions</b>	Site notice or All Adjacent properties properties directly affected at the rear
<b>New Build</b>	<b>All new build residential development sites</b>	Site notice or All Adjacent properties and those directly opposite and directly to rear of site
	<b>All major residential development (10+ units)</b>	Site notice or adjacent properties and those considered to be directly affected

**Major Commercial/Retail Development**

<b>All major commercial/retail development</b>	Site notice or adjacent properties and those considered to be directly affected
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**Change of Use**

<b>All change of use applications</b>	Site notice or adjacent properties and those considered to be directly affected
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**Advertisements**

<sup>3</sup> Relevant local resident and tenant groups will also be consulted where appropriate.

**All advertisements**

Site notice or those required to be consulted by statute

**Conservation Areas and Listed Buildings****Applications in****Conservation areas or  
applications for Listed****Building Consent**

The appropriate CAAC, neighbours as per the description of development. Also notify Heritage England where specified in regulations

<b>Mobile</b>	<b>Phone</b>	<b>Mast</b>
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**Applications**

Site notice and adjoining neighbours

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