

NOTICE OF MEETING

REGULATORY COMMITTEE

Thursday, 19th May, 2016, 7.00 pm – Civic Centre, High Road, Wood Green N22 8LE

Members: To be confirmed at Annual Council on 16 May.

Quorum: tbc

1. FILMING AT MEETINGS

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

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

2. APOLOGIES FOR ABSENCE

3. URGENT BUSINESS

The Chair will consider the admission of any late items of urgent business. Late items will be dealt with under the agenda item where they appear. New items will be dealt with at item 10 below.

4. DECLARATIONS OF INTEREST

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

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

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

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

- 5. MINUTES (PAGES 1 - 10)**
To approve the minutes of the meeting held on 15 February.
- 6. ESTABLISHMENT OF PLANNING AND LICENSING SUB-COMMITTEES 2016/17 (PAGES 11 - 28)**
To establish the Regulatory Committee sub-bodies for the new municipal year.
- 7. HARINGEY QUALITY REVIEW PANEL (DEFERRED FROM PREVIOUS MEETING) (PAGES 29 - 34)**
To provide an introduction and brief overview of the work of the Haringey Quality Review Panel.
- 8. PLANNING SERVICES 2015/16 AND APRIL 2016/17 UPDATE (PAGES 35 - 98)**
To receive a performance update.
- 9. NORTH LONDON WASTE PLAN - PRE-SUBMISSION VERSION (PAGES 99 - 202)**
To receive an update on key issues raised through the consultation on the Preferred Option draft of the North London Waste Plan (NLWP) and to consider the Pre-submission version of the NLWP.
- 10. NEW ITEMS OF URGENT BUSINESS**
To consider any new items of urgent business admitted under agenda item 2 above.
- 11. DATES OF FUTURE MEETINGS**
8 September

Maria Fletcher
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Bernie Ryan
Assistant Director – Corporate Governance and Monitoring Officer
River Park House, 225 High Road, Wood Green, N22 8HQ

11 May 2016

MINUTES OF THE MEETING OF THE REGULATORY COMMITTEE HELD ON Monday, 15th February, 2016, 19:00 hrs

PRESENT:

**Councillors: Peray Ahmet (Chair), Vincent Carroll (Vice-Chair),
Dhiren Basu, David Beacham, John Bevan, Clive Carter, Toni Mallett,
James Patterson and Elin Weston**

198. FILMING AT MEETINGS

The Chair referred those present to agenda item 1 as shown on the agenda in respect of filming at this meeting and asked that those present reviewed and noted the information contained therein.

199. APOLOGIES FOR ABSENCE

Apologies for Absence were noted from Cllr Mitchell.

Apologies were also noted for Peter Studdart who was unable to attend due to illness.

In addition, apologies were also noted from Raymond Prince for lateness.

200. URGENT BUSINESS

There were no items of Urgent Business.

201. DECLARATIONS OF INTEREST

No Declarations of Interest were received.

202. MINUTES

Cllr Bevan requested an update on meeting with the Quality Review Panel, both as Design Champion and as part of the Committee. Officers responded that Peter Studdart from the Quality Review Panel was due to attend the meeting but had to give apologies due to illness. Mr Studdart would hopefully be attending the next meeting to update the Committee on the Quality Review Panel.

The AD Planning added that he was attempting to facilitate the Quality Review Panel meeting with local amenity groups as requested and was looking at what the most efficient and effective manner of doing that would be.

The Chair proposed that this should be done through a community conference to ensure that all groups get equal access. The AD Planning agree to look in to putting together an annual sharing and review process with the panel and Members, potentially around April time and to look in to a similar process for community groups.

Action: Stephen Kelly

Cllr Bevan requested clarification on the issue of security grills within the conservation area on Noel Park Estate. Officers responded that the Committees' concerns around security grills had been reflected in the Noel Park Conservation Area Character Appraisal and Management Plan, presented to the Committee at Agenda Item 8.

Cllr Bevan also sought clarification on pooled resources with the GLA around viability assessments. The AD Planning was due to meet the lead officer on this project last week but the meeting was rescheduled, he advised that Haringey were working with the GLA to move to an agreed and shared protocol.

Cllr Bevan requested an update on the previous action around the terms affordable housing and social housing being set out in a glossary and also consistency in their use in Council reports. Officers responded that a review was undertaken of Local Plan documents to ensure that the terms were used in a consistent manner and that the definition adopted was derived from the National Planning Policy Framework. Officers commented that the Housing and Planning Bill proposed including starter homes being part of that definition.

Cllr Bevan also sought clarification on the re-definition of Travellers and the impact on the provision for Travellers sites within the borough. Officers responded that they had engaged consultants ORS to undertake the further survey work required in light of the change in definition.

Cllr Cater requested that the minutes of 21st September be amended to reflect that he was a Director of the Friends of Finsbury Park Group Ltd and that the minutes reflect that it was a limited company and a registered charity.

Action: Clerk

RESOLVED

That the minutes of the Regulatory Committee on 21st September and the Special Regulatory Committees on the 9th November and the 4th January be approved.

203. REVISION OF GAMBLING POLICY

The Lead Licensing Officer, Daliah Barrett, gave a verbal update to the Committee on the revision of Gambling Policy. The Committee noted that that new Statement of Licensing Policy was on the Council's website and that the Statement of Gambling Policy was also on the website. The Statement of Gambling Policy required updating this year to reflect the new provisions around local risk assessments. The Lead Licensing Officer was pulling together data on ward profiles and was developing a policy that would set out what each of the local risk assessments would be for each betting operator.

Cllr Weston enquired how the risk assessments would impact the Licensing Committee's ability to condition licenses. Officers responded that there was no change to the primary legislation, so there was still a duty on the Committee to aim to permit. Having the risk assessments in place meant that the operator needed to undertake

further research of the area that they wanted to open a premises in and also enabled the panel to put in place some conditions on the premises to open in a particular area. The Committee noted the example of requiring a premises to put a door supervisor on duty.

Cllr Carter asked for clarification on the term aim to permit and enquired whether any discussion had taken place on what the term meant as that term was not used in other aspects of licensing. Officers responded that Gambling Act required that we should aim to permit gambling as far as it is in line with the objectives set in the legislation, the guidance from the Gambling Commission and the Council's Statement of Licensing Policy.

204. REVIEW OF FEES AND CHARGES (LICENSES) 2016/17

The AD Finance apologised for the late dispatch of the report. The AD Finance introduced the report which sought approval for the annual review of the level of Fees and Charges levied upon service users and the accompanying increases entailed. The AD Finance advised that the fee's and charges contained in the report were separate to the fees and charges approved at February Cabinet in a separate report. The Committee was informed that by law, a number of fees and charges could not be approved by Cabinet hence this report.

The Committee noted that the approach in the report was consistent with the Cabinet report in that where there was discretion, an inflationary rate of 1% was proposed. There were a couple of exceptions to this approach such as street trading fees, as set out in paragraph 6.6 of the report.

Cllr Bevan commented that he had written to the Cabinet Member and reiterated his view that the fees and charges should be rounded up or down to the nearest pound or 50 pence, but was told that the fees and charges had already been set. Officers responded that these fees and charges were an entirely separate list of fees and charges from those agreed by Cabinet. Officers also advised that some work had been done to try and achieve a relatively round figure, however there was a balance between doing so and being mindful of the need to justify any increases that were significantly above inflation.

Cllr Bevan asked for clarification on whether this report covered swimming charges and was advised by officers that they were contained in the earlier Cabinet report.

Cllr Carroll enquired whether the authority was charging the maximum allowable amount for gambling fees. Officers responded that they were 5% below the maximum level but the report proposed increasing these by 1 %.

Cllr Bevan proposed moving that the gambling fees be moved to the maximum amount allowable. Officers advised that the Committee could do so but warned that any increases would leave the Council more open to challenge by the betting industry and potentially generate greater scrutiny from the betting industry of what the money from the annual fees was spent on. The Committee agreed that any further increase in gambling fees should be done with caution and properly evidenced.

Assistant Head Litigation & Corporate advised that in terms of timescales, any increase would need to be agreed through the annual budget process, however the ground work could be done beforehand. The AD Finance stated that he was not aware of any reason why a change in the fee level could not come back mid year, subject to the appropriate consultation and equalities assessments being carried out.

Officers agreed to look into increasing gambling fees to their maximum amount and bringing an update back to a future meeting of the Committee.

Action: Daliah Barrett

RESOLVED

To approve the increases to the Council's licensing fees and charges, as set out in Appendix A of the report, with effect from 1st April 2016.

205. NOEL PARK CONSERVATION AREA CHARACTER APPRAISAL AND MANAGEMENT PLAN

The Committee considered a report which fed back on the Noel Park Conservation Area Character Appraisal and Management Plan following the expiration of the public consultation period. The document had been amended in light of the representations received. The Committee was asked to review the finalise draft of the document and recommend it to Cabinet for adoption. The AD for Planning and Lucy Morrow, Conservation Assistant introduced the report.

Ms Morrow informed the committee that, following concerns raised previously around prevention of external security grills, gates and shutters being installed, the report was amended prior to going to consultation to reflect these concerns. Cllr Bevan enquired whether the report referred to security grills on windows as well as doors and requested that the report be amended to include a recommendation that residents seek advice from the crime prevention officer. Ms Morrow agreed to include mention of window security grills and to suggest seeking advice from the crime prevention officer.

Action: Lucy Morrow

The Chair raised concerns around enforcement of the conservation appraisal and enquired what was being done to ensure adequate enforcement took place. Officers responded that the Council was aiming to improve its processes within the Planning Enforcement team and progress was being made on this front. Officers also fed back to the Committee that they were engaging with the Team Noel Park project and with HfH about how they could improve joint working and appropriately target interventions through the TNP project.

Cllr Weston enquired what the position was regarding enforcement for those residents who currently lived outside of the Article 4 and Conservation Area but would be caught in the expanded Article 4 and Conservation Area. Officers responded that the Article 4 declaration was not retrospective and so if changes were made under Permitted Development at the time, they would remain permitted.

In response to a question around outreach work and community engagement, officers advised that the community engagement had already been undertaken as part of the consultation process and it was planned to deliver leaflets to local residents following adoption of the character appraisal and management plan.

Cllr Carroll enquired what would be done in the instance of somebody within the conservation area installing UPVC windows. Officers responded that the normal route would be an Enforcement Notice requiring their replacement. The Chair requested that officers feedback to Cabinet on the need for an effective and consistent approach to enforcement.

The Committee noted the comments received on the draft document and recommended that Cabinet adopted the Noel Park Conservation Area Appraisal and Management plan, subject to the report being amended to include mention of security grills in front of windows as well as doors.

RESOLVED

1. To note the comments received to the consultation on the draft document and how these have been taken into account in the finalising the draft Noel Park Conservation Area Appraisal and Management Plan, highlighted at paragraph 5.18 and set out in the Consultation Statement at Appendix 2 of the report;
2. To recommend to Cabinet that it adopt the finalised draft Noel Park Conservation Area Appraisal and Management Plan as attached at Appendix 2 of the report (subject to expanding the prohibition of security grates to cover both windows and doors);
3. To recommend to Cabinet that the Article 4 Direction be extended to include the whole of the Noel Park Conservation Area in accordance with the appraisal recommendations.

206. REVISED LOCAL DEVELOPMENT SCHEME

The Committee considered a report that set out the revised timetable for the Local Plan documents that the Council was intending to produce over the coming years. The revised Local Development Scheme was being developed to replace the current outdated LDS published in January 2015. The Committee noted that the revised timetable for the Local Development Scheme was around 3 months behind what was agreed in the previous Local Development Scheme.

Cllr Bevan asked for clarification around the five documents that were currently out to consultation and sought clarification on the basis with which a resident could request a change to be made. Officers responded that the Council was currently out to consultation on four key planning documents at pre-submission stage; Alterations to Strategic Policies, Site Allocations, Development Management Plan and the

Tottenham Area Action Plan. The Committee noted that the Wood Green Area Action Plan was out for Regulation 18, Issues and Options stage – which was an open and informal consultation stage seeking stakeholder views on the main issues and options for the scheme.

The test of soundness for those four documents involved the following three criteria: Was the document justified, was it based on robust and credible evidence and was it the most appropriate strategy considered against other alternatives; was the document effective (could it be delivered) and was it flexible enough; was it consistent with national and regional policy.

Cllr Bevan also asked for an update on increasing the range of the Community Infrastructure Levy (CIL). Officers responded that Overview & Scrutiny Committee had recently looked at the CIL process and had recommended revisiting the CIL rates. Officers commented that a piece of work would be undertaken to look at both the rate and the list of the projects that CIL would be applied to once the scrutiny process can be completed.

RESOLVED

1. To note and comment on (if necessary) the revised Local Development Scheme at Appendix A of the report; and
2. To recommend that Cabinet approve the revised Local Development Scheme (LDS) at Appendix A of the report and that in doing so Cabinet resolve that the LDS is to have effect and in the resolution specify the date from which the scheme is to have effect.

207. REVISED PLANNING PROTOCOL 2016

The Committee considered a report seeking approval to adopt a revised version of the Planning Protocol taking account of the lessons learnt in the first year of operation for the existing protocol and the comments made by Members. The purpose of the planning protocol was to provide more detailed guidance on the standards to be followed in relation to planning matters, which supplements the Members Code of Conduct.

Following a workshop to discuss the operation of the Planning Protocol held in October 2015, a key proposal was for the inclusion of speaking rights for ward Members and the Cabinet Member for Planning at pre-application briefing meetings of the Planning Committee. Speaking rights were included at 3 minutes each in the proposed revised protocol. In addition the following additional changes were proposed:

- The removal of reference to the weekly list of planning applications as this was being phased out as a list, by ward, and could be run from the website at any time.
- Clarification that if an application was recommended for refusal a request for referral to Planning Sub-Committee will not be accepted.

- Clarification that there were no public speaking rights at pre-application briefings to committee.
- The introduction of the opportunity for Ward Members or Cabinet Members to speak for three minutes at pre-application briefing meetings to Planning sub-committee.
- Encouraging Ward Members to register their intention to speak at pre-application briefing meetings or at planning sub-committee by midday on the working day prior to the Planning Sub-Committee meetings in order to manage the efficient operation of the Planning Sub-Committee (this cannot be required because of the Committee Procedure rules which allow for any member to speak at the Chair's discretion).
- Clarification that proposals should go before the Quality Review Panel prior to presentation at pre-application committee briefing meetings unless scheduling and programming prevents this.
- Changing references to the Design Review Panel to its replacement the Quality Review Panel.
- Clarifying that the applicant has a right to reply of the equivalent length of time of the objectors and any objecting ward councillors.

The Chair welcomed the proposal to allow speaking rights for ward Members and the Cabinet Member but cautioned that ward councillors needed to make it clear whether they were objecting to a particular application or not. Officers advised that, under the new protocol, Members would be asked to state that intention when they registered to speak. Similarly, if Members arrived on the night and requested to speak, they would also be asked to state their intention as to whether they were objecting or not. The Committee welcomed the removal of any ambiguity in that regard.

Cllr Paterson asked for clarification on the purpose of allowing objecting ward councillors to speak at pre application meetings. Officers responded that when the proceedings were reviewed, there was a certain amount of angst as to why ward councillors were invited to attend when they were unable to take part. After reflecting on the concerns raised, officers added that they did not think it was appropriate for ward councillors to sit around a table with the Committee because it was important for the public to understand who was the Committee and who was a ward councillor. It was felt that the most appropriate solution to this issue was to give the ward Member the opportunity to be able to publically state what their views were in relation to a particular scheme. Officers clarified that it did not have to be an objection and could simply be participation or comments on the scheme.

Cllr Paterson further remarked that his concern was that the pre-application meeting could end up pre-empting the Committee meeting. Officers responded that they shared some of those concerns but on reflection decided that it was important to give ward councillors the opportunity to speak. The Chair commented that she had also a discussion with officers on this issue prior to inclusion in the draft protocol and advocated that having a 3 minute slot to speak was a valuable part of the process in terms of open/transparent decision making and giving Members an opportunity to be involved in the process, giving the developers the chance to hear the views of the local ward councillors. Officers also stated that, going forward, one of the key

objectives sought was to improve the quality of the outcomes that were put in front of the Committee as a decision making body. The pre-application process provided an opportunity for developers to engage with Members on the issues that the Council saw as a priority, at an early stage, to improve the quality of design. The provision would be monitored going forward to observe its effectiveness and the speaking rights could be reviewed if it was subject to abuse.

Officers advised that some form or guidance note for Members on how the pre-application meetings would work, including speaking rights, would be developed. Officers suggested that the Committee may want to review this again in a year's time.

The Committee expressed concern at the intention to discontinue the weekly list of planning applications as they found it extremely useful in terms of understanding what decisions were due. Officers advised that one of the reasons behind doing away with the list was that it tended to drive behaviour, particularly from the public, to wait for its circulation before looking at or commenting on applications and this effectively elongated the process. Officers advised that a daily list of applications by ward could be generated on the website.

Officers agreed to run a training or drop-in session for Members to show them how to use the website effectively.

Action: Emma Williamson

The Committee raised concerns that without a reminder of applications in their wards, Members would struggle to keep track with what was happening on a weekly basis.

Officers also agreed to develop a guidance note and accompanying flow chart for Members that outlined how to access upcoming planning applications, which would be published on the intranet.

Action: Stephen Kelly/Emma Williamson

The Committee requested that, given that most of the issues caused by the weekly list were based around residents and community groups, could a weekly list continue to be developed for councillors. Officers responded that a number of significant changes were being implemented to the Northgate software system and Planning was also scheduled to be included in the My Haringey application in September. Officers agreed to look at whether it would be possible to generate a system of automatic emails or notifications to councillors highlighting when an application was due in their ward. Officers also agreed to look into maintaining the weekly list for councillors in the interim.

Action: Stephen Kelly/Emma Williamson

Officers commented that the Planning service was undergoing a pilot process to implement a new way of working to improve productivity and reduce the timeframe for making a decision on a planning application. Officers further advised that part of the reasoning behind discontinuing the weekly list was that it undermined the process and

tended to result in delays to the 22 day target to make a decision on a planning application.

The AD Planning agreed to circulate a briefing note via Democratic Services around proposals for continuing the weekly list for councillors in the short term and the potential for automating notifications on planning applications, prior to the next meeting.

Action: Stephen Kelly/Emma Williamson

Cllr Weston commented that Paragraph 10.6 of the draft planning protocol did not make sense with the tracked changes and officers agreed to review and amend the wording in the report.

Action: Emma Williamson

RESOLVED

1. That the Regulatory Committee adopt the revised planning protocol;
2. That the Regulatory Committee requires that the Planning Sub-Committee implement the provisions of the revised planning protocol; and
3. That the Regulatory Committee authorises the Assistant Director Corporate Governance in consultation with the Assistant Director Planning to make any consequential amendments to the protocol arising out of any changes made to the Council’s constitution or scheme of delegation

208. HARINGEY QUALITY REVIEW PANEL

This item was deferred until the next meeting of the Committee.

Action: Clerk

209. NEW ITEMS OF URGENT BUSINESS

None.

210. DATES OF FUTURE MEETINGS

The future meeting dates were noted as to be confirmed, in line with approval of the calendar for the new municipal year.

CHAIR: Councillor Peray Ahmet

Signed by Chair

Date

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Report for: Regulatory Committee 19 May 2016

Item number:

Title: Establishment of Planning and Licensing Sub-Committees 2016/17

Report authorised by : Bernie Ryan, Assistant Director of Corporate Governance & Monitoring Officer

Lead Officer: Michael Kay, Democratic Services Manager

Ward(s) affected: All

1. Describe the issue under consideration

1.1 To establish for the 2016/17 municipal year a) Planning Sub-Committee to conduct town planning and miscellaneous functions and b) two Licensing Sub-Committees to conduct both the statutory and non-statutory licensing functions of the Council as set out in Part Three, Section B of the Council's constitution which is attached as Appendix 3 to this report. Members are also asked to note the provisions for the appointment of substitutes.

2. Cabinet Member Introduction

Not applicable.

3. Recommendations

3.1 To note the terms of reference of the Regulatory Committee as set out within the Council's Constitution attached as Appendix 1 and confirm the terms of reference of the Planning and Licensing Sub-Committees attached as Appendix 3 to this report.

3.2 That Members agree the establishment of a Planning Sub-Committee and two Licensing Sub-Committees with the memberships set out in Appendix 2 to this report (to follow once membership is confirmed at Annual Council on 16 May).

3.3 That Members note the provisions in the Committee Procedure Rules, Part 4, Section B of the Constitution covering substitution arrangements for Committees and Sub-Committees. Additional delegations are made to the Democratic Services Manager (Part 3, Section E paragraph 1.5 of the Constitution), attached at Appendix 4ii to this report, for the appointment of a substitute Member for a Licensing Sub-Committee from among the Members of the Regulatory Committee when the permanent Sub-Committee Member is unable to attend for any reason.

3.4 To note that the Council Procedure Rules in Part 4 Section B of the Constitution do not apply to licensing hearings only in those areas where they conflict with the Local Licensing Procedure Rules and the relevant Acts and Regulations which take precedence.

4. Reasons for decision

4.1 To support the discharge of planning and licensing functions as set out within Part Three, Section B of the Council's constitution (Appendix 3).

5. Alternative options considered

Not applicable.

6. Background information

Regulatory Committee

6.1 The Full Council appoints the membership of the Regulatory Committee including its Chair and Vice-Chair. By law there must be at least 10 but no more than 15 appointed Members. The Committee can still meet and undertake its business with a quorum of 4 Members.

6.2 The Council can determine the terms of reference of the Committee. These are currently set out in Part 3 Section B of the Council's Constitution and attached as Appendix 1 to this report. Members are invited to note the Committee's terms of reference.

Establishing the Licensing Sub-Committees

6.3 The Regulatory Committee may establish Licensing Sub-Committees to conduct hearings. Although the membership for these has been reported to Annual Council, legally it is the Regulatory Committee that fixes these Sub-Committees' membership and confirms their terms of reference. The suggested membership of the two Licensing Sub-Committees, as reported to Annual Council, will be set out in Appendix 2 to this report (to follow).

6.4 Last year there were two Licensing Sub-Committees to deal with contested applications. It is anticipated that the volume of applications will continue for the foreseeable future. It is recommended that two Licensing Sub-Committees be appointed and this should be sufficient. The appointed membership of the Sub-Committees is fixed by law at 3 Members. The Council's own Local Licensing Procedure Rules set the quorum for hearings at 3 Members since this promotes better decision-making.

6.5 On occasion, an appointed Member of a Licensing Sub-Committee cannot take part in the decision on a particular case, for example, due to a conflict of interest or if the premises in question is located in the Member's own Ward. In such cases, and any other case where a Member is unexpectedly absent or seriously late, it will be necessary to appoint a substitute Member often at short notice. Any such substitution will be made in accordance with the provisions of Part 3, section E, Paragraph 1.5 (j-l) of the Constitution. Substitute Members would always be trained Members of the Regulatory Committee who were able to make themselves available.

6.6 Members of the Committee are asked to note the terms of reference of the Licensing Sub-Committees. These are set out in Part 3, Section B of the Constitution and attached as Appendix 3 to this report. Reports on matters of general concern and decisions on general procedural issues will come to the Regulatory Committee.

- 6.7 While there is no requirement in law for the statutory licensing committee (or its sub-committees) to reflect political balance, historically this has been done as a matter of good governance.

Establishing the Planning Sub-Committee

- 6.8 The Regulatory Committee may establish a Planning Sub-Committee to exercise town planning and miscellaneous functions and fix its membership and confirm its terms of reference as set out in appendix 3. In line with the last municipal year, it is recommended that one Planning Sub-Committee be established.
- 6.9 The membership of the Planning Sub-Committee must be constituted in accordance with the provisions of the Local Government and Housing Act 1989 and the Local Government (Committees and Political Groups) Regulations 1990 in terms of political balance. The proportionality split is as follows: Labour Councillors (48 Members) now constitute 84.2% of the available seats on the Council and Liberal Democrats Councillors (9 Members) occupy 15.79%. Where practicable, the allocation of seats on Committees should be in line with the proportion of seats on the Council held by the political groups. The rule about proportionate allocation of seats on bodies overall takes precedence over the rule about proportionate allocation on any individual body. The membership of the Planning Sub-Committee will be set out in Appendix 2 to this report, which will be circulated once the membership of the full Regulatory Committee is confirmed at Annual Council.
- 6.10 The quorum for Planning Sub Committee meetings shall be in line with Part four section B of the Constitution in that no business shall be transacted unless a quarter of the whole number of voting Members are present.

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

The Chief Finance Officer confirms that there are no financial implications arising from the recommendations in this report.

Comments of Assistant Director of Corporate Governance

The Assistant Director of Corporate Governance has been consulted and approves the content of this report.

Equalities and Community Cohesion Comments

The Council has a public sector equality duty under S149 of the Equality Act 2010 to have due regard to need 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 those characteristics and people who do not.

An initial screening of the proposals in this report has been completed and the proposals carry no implications for any aspect of the duty outlined above.

8. Use of Appendices

8.1 Appendix 1 to this report is the terms of reference of the Regulatory Committee

8.2 Appendix 2 to this report is the proposed membership of the Planning Sub Committee and two Licensing Sub- Committees (to follow)

8.3 Appendix 3 to this report is the terms of reference of the Planning and Licensing Sub- Committees

8.4 Appendix 4 to this report is the extracts from the Committee Procedure Rules and Scheme of Delegation to officers in respect of substitution arrangements.

9. Local Government (Access to Information) Act 1985

9.1 The following background papers were used in the preparation of this report:

(i) The Council's Constitution and (ii) Local Licensing Procedure rules.

PART THREE – RESPONSIBILITY FOR FUNCTIONS
Section B – Full Council & Non-Executive Bodies

6. Alexandra Palace and Park Board

To fulfil the functions, powers and duties of the Council as Trustee of Alexandra Palace and Park under the Alexandra Park and Palace Acts and Order 1900 to 1985 and, without prejudice to the generality of this, these functions include:

- (a) The duty to uphold, maintain and repair the Palace and to maintain the Park and Palace as a place of public resort and recreation and for other public purposes.
- (b) Acting as the employing body for employees engaged in the working of the Trust at Alexandra Palace, and to be responsible for the setting of staffing policies, conditions of service and terms of employment of those employees.
- (c) In relation to the Trust, being responsible for developing and monitoring the implementation of effective policies and practices to achieve equality of opportunity both for employment and service delivery.

7. The Regulatory Committee

The Regulatory Committee has functions either (1) as the statutory Licensing Committee of the Council under the Licensing Act 2003, which also exercises functions under the Gambling Act 2005, or (2) as a non-statutory Committee exercising other non-executive functions relating to Licensing, Town Planning and other regulatory matters generally. At the beginning, and at other appropriate stage(s) in each meeting, the Chair will make a short announcement indicating whether the Committee is operating in its capacity as "statutory Licensing Committee" or as a "non-statutory Committee".

Membership

The Regulatory Committee must have between 10 and 15 Members in order to comply with the legislation as statutory Licensing Committee.

Protocol

There is a Protocol outside this Constitution setting out how the Regulatory Committee is to operate. The Protocol shall be applied in a manner consistent with Committee Procedure Rules in Part 4 and the relevant Licensing Procedure Rules when the Committee is conducting a formal hearing. Any issue on procedure at the meeting shall be subject to the ruling of the Chair. The Protocol can be amended by the written agreement of the Leaders of the Political Groups on the Council.

- (1) In its capacity as the statutory Licensing Committee the Committee has all the functions referred to it by law under the Licensing Act 2003 and the Gambling Act 2005. These include:

PART THREE – RESPONSIBILITY FOR FUNCTIONS

Section B – Full Council & Non-Executive Bodies

- (a) To be responsible for monitoring the operation of the Acts licensable activities and gambling in the Borough;
 - (b) To establish the Licensing Sub-Committees and to agree the delegation of functions to the Sub-Committees and to officers;
 - (c) To receive reports on the matters in (a) above and on the functions delegated to the Licensing Sub-Committees and to officers. To call for a report on any individual case;
 - (d) To determine the procedures to be followed in handling applications, notices, representations and all hearings, subject to the relevant Regulations;
 - (e) Subject to Regulations, to determine the fees payable for applications for premises licences and related matters under the Gambling Act 2005;
 - (f) In a Council Election Year when there is a need to hold a hearing in the period between Election day and the Annual Meeting of the Council, those Members of the Committee who are re-elected as Councillors shall meet as the Committee (subject to there being a quorum of 3 Members) in order to exercise any of the functions of the Licensing Sub-Committees, or of the Committee under (f) above, and shall elect a Chair for the meeting.
- (2) In its capacity as the non-statutory Committee exercising other non-executive functions the Committee has the following functions:
- (a) Exercising the functions which are stated not to be the responsibility of The Executive/Cabinet In Regulation 2 and Schedule 1, Paragraph B (Licensing and Registration) of The Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (as amended) and in any Statute or subordinate legislation further amending these Regulations. The Committee's functions are to determine all policy issues, procedures and standard terms and conditions relating to the non-executive licensing functions but exclude decisions in individual cases which are delegated to the Licensing Sub-Committees. The Sub-Committee's remit includes the licensing of street trading, scrap metal dealing, special treatment premises, sex establishments and dog breeding establishments;
 - (b) Formulating, reviewing and approving for consultation the Statement of Licensing Policy under the Licensing Act 2003 and recommending it, and any revisions to it, to full Council for adoption;

PART THREE – RESPONSIBILITY FOR FUNCTIONS

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- (c) Being consulted informally on the review and determination of the Statement of Gambling Policy, including procedures for Council consultation with external stakeholders, and making recommendations on these matters to the Cabinet;
- (d) Making informal recommendations to the Cabinet and full Council on local development documents, development plan documents, the local development framework, the statement of community involvement and any other planning policy matter;
- (e) Reviewing all Council plans and policies on any licensing, planning or regulatory matters, exercising an overview in relation to common themes and making informal recommendations on these matters to Cabinet and full Council;
- (f) Making informal recommendations to the Cabinet and other bodies on service delivery, grant aid, commissioning and procurement matters when these involve or relate to licensing, planning, conservation or regulatory issues.

8. The Health and Wellbeing Board

8.1 Health and Wellbeing Board functions

The Health and Wellbeing Board will have the following functions:

- (a) To carry out the Board's statutory duties as set out in the Health and Social Care Act 2012, in particular:
 - (i) for the purpose of advancing the health and wellbeing of the people in its area, to encourage persons who arrange for the provision of any health or social care services in its area to work in an integrated manner;
 - (ii) to provide advice, assistance or other support as it thinks appropriate for the purpose of encouraging arrangements under section 75 of the NHS Act. These are arrangements under which, for example, NHS Bodies and local authorities agree to exercise specified functions of each other or pool funds;
 - (iii) to encourage persons who arrange for the provision of any health-related services in its area to work to closely with the Health and Wellbeing Board;
 - (iv) to encourage persons who arrange for the provision of any health or social care services in its area and persons who arrange for the provision of any health-related services in its area to work closely together;

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PART THREE – RESPONSIBILITY FOR FUNCTIONS
Section B – Full Council & Non-Executive Bodies

- (b) To determine whether or not the member of co-opted member did / did not fail to comply with the Members' Code of Conduct.
- (c) Where the Sub-Committee has determined that a member has failed to comply with the Members' Code of Conduct to take such action as it may lawfully take.
- (d) In consequence of the hearing and determination of any allegation to make recommendations to the Council with a view to promoting high standards of conduct amongst members.

The quorum of the Hearing Sub-Committee is three.

4. Under The Regulatory Committee

4.1 Licensing Sub-Committees

Introduction

The Licensing Sub-Committees have functions either (1) as Sub-Committees of the Regulatory Committee in its capacity as the statutory Licensing Committee of the Council under the Licensing Act 2003, which also exercises functions under the Gambling Act 2005, or (2) as Sub-Committees of the Regulatory Committee in its capacity as a non-statutory Committee exercising non-executive licensing and regulatory functions. At the beginning, and at other appropriate stage(s) in each meeting, the Chair will make a short announcement indicating whether the Sub-Committee is operating in its capacity as "statutory Licensing Sub-Committee" or as a "non-statutory Sub-Committee".

Membership

The membership of each Sub-Committee shall be drawn from the Regulatory Committee. In the event that an appointed Member or Members of a Sub-Committee is unable or unwilling to take part in a hearing for any reason a Special Licensing Sub-Committee may be appointed from among the remaining Members of The Regulatory Committee. When operating in its capacity as "statutory Licensing Sub-Committee" there must be a membership and quorum of 3 present at all times.

- (1) General Provisions Relating to the Statutory Licensing Sub-Committees
 - (a) Licensing Sub-Committees have the power to make final decisions on behalf of the Council on matters within their terms of reference and there is no right of appeal to the Regulatory Committee;

Functions under both the Licensing Act 2003 and the Gambling Act 2005

- (b) To determine applications for premises licences where relevant

PART THREE – RESPONSIBILITY FOR FUNCTIONS
Section B – Full Council & Non-Executive Bodies

representations have been made;

- (c) To determine applications for provisional statements where relevant representations have been made;
- (d) To determine valid applications for review of premises licences where relevant representations have been made;
- (e) To decide on any other matter where it is necessary or desirable for Members to make that decision;

Functions under the Licensing Act 2003 alone

- (f) To determine applications for variations of premises licences where relevant representations have been made except in the case of minor variations;
- (g) To determine applications to vary designated premises supervisors following police objections;
- (h) To determine applications for transfer of premises licences following police objections;
- (i) To consider police objections made to interim authority notices;
- (j) To determine applications for club premises certificates where relevant representations have been made;
- (k) To determine applications to vary club premises certificates where relevant representations have been made except in the case of minor variations;
- (l) To determine valid applications for review of club premises certificates where relevant representations have been made;
- (m) To decide whether to give counter notices following police objections to temporary event notices;
- (n) To determine applications for grants of personal licences following police objections;
- (o) To determine applications for renewals of personal licences following police objections;
- (p) To decide on revocation of personal licences where convictions come to light after grant;
- (pa) To determine the review of a premises license following a closure order

PART THREE – RESPONSIBILITY FOR FUNCTIONS
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where relevant representations have been made

Functions under the Gambling Act 2005 alone

- (q) To determine applications for variations of premises licences where relevant representations have been made;
- (r) To determine applications for transfers of premises licences following representations by the Gambling Commission or others;
- (s) To determine applications for the re-instatement of premises licences where relevant representations have been made;
- (t) To decide whether to give counter notices following objections to temporary use notices;
- (u) To determine applications for the grant or renewal of club gaming permits and club machine permits where valid objections have been received;
- (v) To determine proposals to cancel club gaming permits and club machine permits where the licence holder requests a hearing;
- (w) When the licence holder requests a hearing, to determine officer proposals: (i) to make an order removing the entitlement of an on-premises alcohol licence holder to have one or two gaming machines, or (ii) to cancel or vary a licensed premises gaming machine permit;
- (x) To determine applications for the grant or variation of licensed premises gaming machine permits for 5 or more machines or in any case where the Chair of the Regulatory Committee considers that there is cause for concern about the proper management of the premises;
- (2) General Provisions Relating to the Non-Statutory Licensing Sub-Committees
 - a) The Sub-Committees have all the functions which are stated not to be the responsibility of the Council's Executive/Cabinet in Regulation 2 and paragraph B (Licensing and Registration) of Schedule 1 of The Local Authorities (Functions and Responsibilities) (England) Regulations 2000 S. I. 2853, as amended, or further amended, in any statute or subordinate legislation. The Sub-Committee's remit includes the licensing of street trading, scrap metal dealing, special treatment premises, sex establishments and dog breeding establishments.
 - (b) The Sub-Committees make decisions in all individual licensing or registration cases where a hearing is required because of an objection to an application or to a proposed revocation or because of an officer

PART THREE – RESPONSIBILITY FOR FUNCTIONS
Section B – Full Council & Non-Executive Bodies

recommendation for refusal.

- (c) The Sub-Committees have the power to make final decisions on behalf of the Council in relation to its functions in (b).
- (d) Excluded from the Sub-Committees' terms of reference are decisions on all policy issues, procedures and standard terms and conditions which are within the remit of The Regulatory Committee.

4.2 Planning Sub-Committee

There is a Protocol outside this Constitution setting out how Members of the Planning Sub-Committee will exercise those functions, including behaviour in relation to applicants, residents and other third parties, to ensure the probity of planning transactions and the highest standards expected in public office. This protocol is supplementary to the Members' Code of Conduct at Part 5 of the Constitution.

The Sub-Committee has all the functions which are set out below and which are stated not to be the responsibility of the Executive in Regulation 2 and Schedule 1 of The Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (as amended) and in any statute or subordinate legislation further amending those Regulations (references to paragraphs are to those in Schedule 1):

- (a) paragraph A - Town Planning Functions
 - (A) planning applications for the erection of 10 or more dwellings and where the officer recommendation is for approval;
 - (B) planning applications for changes of use 1000 sq. metres of gross internal floor space and where the officer recommendation is for approval;
 - (C) planning applications for the erection, or extension of non-residential buildings where the new build is more than 1000 sq metres gross internal floor space and where the officer recommendation is for approval;
 - (D) unless otherwise agreed with the chair of the Planning Sub-Committee, planning applications either:
 - (i) for major development as categorised by the Department for Communities in Local Government (DCLG) and where the officer recommendation is for approval; or
 - (ii) where a S106 is required; or
 - (iii) where the decision would be contrary to a policy in the development plan;

PART THREE – RESPONSIBILITY FOR FUNCTIONS
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- (E) planning applications submitted by or on behalf of the Council except for applications for development within the curtilage of a dwelling house;
 - (F) planning applications on Council owned land, where the Council is not the applicant, where significant material planning objections are received during the consultation process and which the Director, in consultation with the Chair of the Planning Sub-Committee, determines should be subject to Members' consideration;
 - (G) planning applications submitted by or on behalf of Members; or employees within the Planning Service or senior employees elsewhere in the Council; or their spouses, parents or children;
 - (H) any planning application to amend an application or vary conditions or a section 106 agreement previously decided/imposed by Planning Sub-Committee and which the Director, in consultation with the Chair of the Planning Sub-Committee, considers to constitute a major or significant change;
 - (I) any planning application where there have been objections from a single Ward Councillor and/or a local community body and/or a local residents' association, and a written request setting out the planning reasons for the matter to be referred to the Planning Sub-Committee has been made before the expiry of the consultation period, and which the Director in consultation with the Chair of the Planning Sub-Committee considers should be referred to the Planning Sub-Committee for determination;
- (b) paragraph I - Miscellaneous Functions;
- (A) the creation, stopping up and diversion of highways, footpaths and bridleways in connection with development control decisions, and
 - (B) the preservation of trees;
 - (c) The Sub-Committee may enter into highway works agreements under section 278 of the Highways Act 1980 in connection with the determination of a planning application.

SECTION 4 - UNDER ALEXANDRA PALACE AND PARK

Arising from the Council's role as trustee of Alexandra Palace and Park the following additional bodies shall be established. Membership of the additional bodies is as described in the Appointments of Non Executive Committees, Sub-Committees, as approved by the Annual Meeting. The Terms of Reference of the additional bodies shall be as follows:

PART FOUR – RULES OF PROCEDURE
Section B – Committee Procedure Rules

discussion of the relevant matter is concluded unless that member has obtained a dispensation from the Council's Standards Committee.

45. If a member of a Committee has a personal interest which is not a disclosable pecuniary interest nor a prejudicial interest, the member is under no obligation to make a disclosure at the meeting but may do so if he/she wishes.

VOTING

46. Unless the Constitution provides otherwise, any matter will be decided by a simple majority of those members present and voting in the room at the time the question was put. Voting shall be by a show of hands.
47. Immediately after the vote is taken, a member may require to be recorded in the minutes whether he/she voted for or against the decision or abstained.
48. In the case of an equality of votes, the Chair shall have a second or casting vote, unless the constitution of the body as approved by the Council provides otherwise.
49. Proposals carried are recorded as resolutions or recommendations. Proposals lost are not recorded, except as provided for in (2) above.

ATTENDANCE

50. Any member of the Council may attend the public part of all meetings whenever he/she wishes and, with the Chair's consent, may take part in the business of a meeting of which he/she is not a member but may not move a resolution nor vote. Before a member participates in or addresses a meeting under this rule, written notice should be given to the Chair, preferably before the meeting but in any event as soon as the member arrives at the meeting. Members of the Council are not required to complete any form used by the public to request permission to speak at a meeting.
51. With the Chair's consent, any member of the Council may attend the exempt part of meetings whenever he or she wishes and may take part in the business of a meeting of which he or she is not a member but may not move a resolution nor vote. No member, other than the appointed members of the bodies concerned, may attend certain meetings affecting specific individuals, such as Appointments Panels, hearings and appeals where this is prevented in the Constitution or procedure rules of the body or where advised by the Monitoring Officer.
52. Every member attending a meeting shall sign his/her name on the attendance sheet provided for that purpose.

PART FOUR – RULES OF PROCEDURE
Section B – Committee Procedure Rules

53. Where a member is proposing to be absent for any reason from a meeting of a particular Committee/Sub-Committee to which they have been appointed they may give notice to arrange for a substitute member in their place. The Chief Whip of a political group may give this notice in place of any member from that group who will be absent.
54. Notice under rule 53 must be given in writing, including e-mail, to the Democratic Services Manager by 10.00 a.m. on the day of the meeting if the meeting commences at 6.00 p.m. or later. Where the meeting commences before 6.00 p.m., the notice must be given by 10.00 a.m. on the previous working day before the meeting.
55. On receipt of notice under rule 53 above, the Democratic Services Manager will notify the Chief Whip for the political group of the member who will be absent. The Chief Whip will make arrangements for the attendance of a substitute member from the list of reserve members for that Committee/Sub-Committee nominated by the group. Where none of the listed reserve members for the relevant Committee/Sub-Committee is available, or where no reserve members have been nominated, then the Chief Whip may select any other member of the group. The provisions of this rule are subject to rule 58 below.
56. The name of the Member selected to act as the substitute must be notified in writing, including e-mail, by the Chief Whip to the Head of Local Democracy & Member Services no later than 3 hours before the time for commencement of the meeting stated on the agenda.
57. If the Chief Whip of a political group is absent or unable to act for any reason, then any action to be taken by the Chief Whip in this rule may be undertaken instead by the group's Assistant Whips, Group Secretary and Group Chair.
58. In the case of meetings of Committees/Sub-Committees where prior member training is required, only those members who have attended appropriate training can be selected as substitutes. Currently these bodies are the Standards Committee and its Sub-Committees, the Planning Sub-Committee, Haringey Council and Employees Joint Consultative Sub Committee, Dismissal Appeals Sub-Committee, and hearings conducted by the Licensing Committee and its Sub-Committees. Reserve members will be trained for the relevant body as soon as possible after their appointment.
59. Substitutes properly appointed will be recorded in the minutes and shall carry full voting and other rights and responsibilities. Rule 53 does not apply so as to allow substitution at meetings of The Cabinet or its Committees or its subordinate bodies.

RECORDING, PHOTOGRAPHY AND USE OF SOCIAL MEDIA AT MEETINGS

PART THREE – RESPONSIBILITY FOR FUNCTIONS**Section E – Scheme of Delegation – Section 4 Proper Officer and Specified Officer Functions**

refusal of a request, under section 2 and Part 2 of the Freedom of Information Act 2000;

- (i) Being the “qualified person” to form a reasonable opinion as to whether disclosure of information would be likely to inhibit the free and frank provision of advice or exchange of views or would be likely otherwise to prejudice the effective conduct of public affairs under section 36 of the Freedom of Information Act 2000;
- (j) In addition the Assistant Director of Corporate Governance is empowered to exercise powers to authorise directed surveillance or the conduct and use of a covert human intelligence source for the purpose of preventing or detecting crime pursuant to sections 28 and 29 Regulation of Investigatory Powers Act 2000

1.5 Democratic Services Manager

The Democratic Services Manager is appointed Proper Officer and specified officer in relation to:

- (a) Those proper officer functions relating to access to information not delegated to the Assistant Director of Corporate Governance above under Part VA and Schedule 12A of the Local Government Act 1972 and the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 (Access to Information);
- (b) Section 191 of the Local Government Act 1972 (providing information to assist the Ordnance Survey);
- (c) Sections 225 and 229 and Schedule 14, Part II, Paragraph 25 (7) of the Local Government Act 1972, and Section 41(1) of the Local Government (Miscellaneous Provisions) Act 1976 (custody of, and certifying, documents);
- (d) Section 8 of the Representation of the People Act 1983 (the officer who will act as Deputy to the Electoral Registration Officer in the event of the latter’s incapacity or a vacancy arising);
- (e) Section 2(2) of the Local Government and Housing Act 1989 (Maintenance of the list of politically restricted posts);

In addition the Democratic Services Manager is empowered:

- (f) To determine the appointment of outside members to the “pool” from which the membership of School Admissions Appeals Panels and School Exclusions Appeals Panels are drawn;

PART THREE – RESPONSIBILITY FOR FUNCTIONS

Section E – Scheme of Delegation – Section 4 Proper Officer and Specified Officer Functions

- (g) To determine the membership of individual Appeals Panels (under (f) above) and the selection of Chairs of these Panels;
- (h) To make appointments of representative School Governors as notified by the Cabinet Member for Children or the Opposition Spokesperson, as appropriate;
- (i) To make appointments to vacancies on the Standing Advisory Council on Religious Education and Conference Committees;
- (j) To make appointments to the membership of Special Licensing Sub-Committees from among the Members of the Regulatory Committee;
- (k) To appoint an additional Member or Members to any scheduled meeting of a Licensing Sub-Committee from among the Members of the Regulatory Committee whenever the appointment of a substitute Member under the Committee Procedure Rules (Part 4, Section B) would be impracticable and the meeting would otherwise be inquorate;
- (l) The exercise of the delegated powers in (j) and (k) above shall be, so far as practicable, in consultation with the Chair of the Regulatory Committee and the Chief Whip of each Group and with a view to achieving political balance in the membership of Licensing Sub-Committees.
- (m) To appoint the membership of Assessment Sub-Committees, and Hearing Sub-Committees in accordance with the arrangements for dealing with allegations that a member or co-opted member has failed to comply with the Members' Code of Conduct and the decisions of the Standards Committee and in consultation with the Chair of the Standards Committee and the Monitoring Officer.

1.6 Business Manager, Legal Services

The Business Manager, Legal services is appointed Proper Officer and specified officer in relation to the provisions of The Registration Services Act 1953 (appointment of superintendent registrars and registrars of births and deaths and their deputy and interim officers and all related functions therein).

1.7 Assistant Director for Human Resources

The Assistant Director for Human Resources is authorised to provide the "Certificate of Opinion" for an employee on SCP44 or above making

Report for: Regulatory Committee

Title: Haringey Quality Review Panel

Report authorised by : Lyn Garner Corporate Director Planning, Development and Regeneration

Lead Officer: Stephen Kelly Assistant Director – Planning

Ward(s) affected: All

- 1. Describe the issue under consideration**
The report provides an introduction and brief overview of the work of the Haringey Quality Review Panel
- 2. Recommendations**
That the report and associated presentation be noted.
- 3. Reasons for decision**
Not applicable
- 4. Alternative options considered**
This report is for noting. Alternative options are not applicable.
- 5. Background information**
The Haringey Quality Review Panel was established in April 2015 with an independent chair, Peter Studdert. The panel comprises 21 experts appointed from over 60 applications following a national recruitment campaign. The panel members encompass a range of disciplines, including architecture, urban design, landscape design, building engineering, conservation and accessibility.

Since April, applicants for major development have been encouraged to submit their proposals to the quality review panel for consideration and comment. To date over 20 schemes have been reviewed – some schemes have been reviewed more than once (see appendix A).

The comments from the Quality Review Panel have been included in planning officer reports to the Planning Committee and have assisted the Local Planning Authority when it is balancing the sometimes competing policy considerations that are part of the decision making process.

In parallel with the work of the Quality Review Panel, the planning authority has also undertaken a range of other activities aimed at supporting and promoting improved development outcomes for the borough. These include the development of a suite of new Local Plan documents – including the creation of a “Haringey Development Charter” (contained within the Draft Development Management Policy DM1) and revisions to the Planning Protocol for members

and officers – to enable development proposals to be presented to the Planning Committee for comment at the “pre-application” stage.

The Chair of the Quality Review Panel will attend the regulatory Committee meeting to report on the progress made and experiences of the Panel since it was established and to receive questions from the Committee on matters relating to the work of the panel.

6. Contribution to strategic outcomes

The QRP is part of a service wide programme of measures that aim to promote and secure higher quality development outcomes for the Borough. The work of the Panel and the Planning Service plays a central role in the physical renewal and regeneration of the Borough and contributes to the successful achievement of outcomes associated with priority three, four and five of the Corporate Plan – including the Wood Green and Tottenham regeneration programmes.

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

Not applicable

Finance and Procurement

The establishment costs (advertisement and project management) were paid for through the planning service budget. The operating costs of the Panel are recovered in full through charges levied upon the developers that use the panel.

Legal

The Assistant Director of Corporate Governance has been consulted on the preparation of the body of this report and confirms that there are no immediate legal issues arising from it.

8. Appendices

Appendix A: Schedule of schemes reviewed and QRP members.

9. Local Government (Access to Information) Act 1985

- a. Haringey Development Management Polices DPD January 2016
- b. Planning Protocol 2015

Appendix A Quality Review Panel: Schemes reviewed and list of Members 2016

Schemes reviewed April 2015 to January 2016

1. Connaught House
2. 33-35 Crouch End Hill
3. Apex House
4. Tottenham Hale District Centre Framework
5. Beacon Lodge, 35 Eastern Road
6. 191-201 Archway Road
7. 255 Lordship Lane
8. Northumberland Development Project (THFC)
9. 109 Fortis Green
10. Technopark through School
11. Canning Crescent
12. St. Ann's Police Station
13. 500 White Hart Lane
14. Bruce Grove Station
15. Templeton Road Garages
16. Cross Lane
17. Hale Wharf
18. Tottenham Hale Green Grid
19. 45 – 63 & 67 Lawrence Road
20. Hawes and Curtis Building

Current list of Panel members

Architects

Andrew Matthews Director of Proctor and Matthews Architects

Principal of well-respected and established firm of architects specialising in housing design. Abode, Great Kneighton won a Civic Trust Award, and was Housing Design Awards Supreme Winner in 2015. www.proctorandmatthews.com

Annalie Riches Director of Mikhail Riches

Principal of small architectural practice, producing high quality work. They have won several Housing Design Awards and made the Stirling Prize mid-list for their Clay Field project in Suffolk and Church Walk in London, which also won Building of the Year in 2013. www.mikhailriches.com

Hari Phillips, Bell Phillips Architects

Bell Phillips Architects was established in 2001 after Tim Bell and Hari Phillips won an international design competition to carry out a major regeneration project in East London. They have particular expertise in housing design. www.bellphillips.com

John Lyall. Lyall Bills and Young

John Lyall is currently vice chair of the LLDC Quality Review Panel, and has substantial experience of design review. John Lyall Architects designed the Tottenham Hale tube modernisation. www.lbyarchitects.com

Phyllida Mills, Mills Power

Phyllida is a current member of the Haringey DRP, and has recently established her own practice. Previously she was a partner at Penoyre & Prasad Architects. She has particular expertise in school design. www.millspower.com

Stephen Davy, Stephen Davy Peter Smith Architects

Stephen is a current member of the Haringey DRP, and grew up in the Borough. His practice specialise in housing design – often working with Housing Associations.

www.davysmitharchitects.co.uk

Tim Pitman, Pitman Tozer

Tim's practice is one of 6 practices chosen from more than 300 entries to join the Peabody Trust Small Projects Panel. Their Mint Street Project for Peabody has won numerous awards including the Housing category at the New London Architecture Awards in 2014.

www.pitmantozer.com

Wen Quek, Cullinan Studio

Wen is a partner at Cullinan Studio, a highly respected architectural practice with a broad range of completed projects, many of which have won awards. She is also an external examiner at the University of Nottingham, and was previously a Design Council CABA Enabler.

www.cullinanstudio.com

Landscape architects

Deborah Nagan, (uncommon)

Deborah is principal of a small landscape architecture practice based in London. She is also on the steering group for the South Bank and Waterloo Neighbourhood Plan, and serves with Peter Studdert on the Oxford Design Review Panel.

www.uncommonland.co.uk

Robert Aspland, LDA Design

Robert is a partner at LDA Design, a well-established landscape architecture practice, who are probably best known for their work on the Olympic Park. www.lda-design.co.uk

Hugo Nowell Urban Initiatives

Hugo is a Director of Urban Initiatives Studio with 20 years experience of urban design master planning and public realm design. His work ranges from city centre and residential master planning, preparation of design codes and design guidance through to detailed design and delivery on site. <http://www.uistudio.co.uk>

Urban designer / heritage experts

Charles Wagner, English Heritage

Charles was formerly Head of Planning and Urban Advice at English Heritage. He has an interest in joining the panel because of his 6 years' experience helping with the regeneration of Tottenham High Road.

David Birkbeck, Design for Homes

David Birkbeck wrote the Building for Life matrix, and is a leading thinker on housing design. www.designforhomes.org

Esther Kurland, Urban Design London

Esther Kurland is Director of Urban Design London, who provide support and training for London Boroughs, TfL and the GLA. They also provide design surgeries, which are an informal type of design review. Esther Kurland previously served as a member of CABA's Crossrail design review panel. www.urbandesignlondon.com

Selina Mason, LDA Design

Selina Mason was previously Director of Design Review at CABE, before moving to the Olympic Delivery Authority as Deputy Director of Design. She is now a partner at LDA Design, and specialises in urban design and master planning. www.lda-design.co.uk

M & E engineering / sustainability

Chris Twinn, Twinn Sustainability Innovation

Chris Twinn was previously an Arup Fellow / Director, and has participated in a large number of government advisory committees on low carbon and sustainable development. He has also served as a member of CABE's design review panel.

David Lindsey, Max Fordham

David is a senior partner at a highly respected firm of M & E engineers, with a particularly strong reputation for energy efficient and sustainable design. www.maxfordham.com

Civil / structural engineer

Gary Elliot, Elliot Wood

Gary Elliot is a founding partner and now managing partner of Elliot Wood. He has worked on numerous award winning projects with leading architects and clients. He has also sat on the Merton Design Review Panel. www.elliottwood.co.uk

Property Developer

Andrew Beharrell, Pollard Thomas Edwards

Andrew is senior partner at PTEa an architectural practice specialising in housing design. He is also a Haringey resident, and lives in a development that won a Haringey Design Award in 2012 – for which they were both designer and developer. www.pollardthomasedwards.co.uk

Inclusive Design

Ann Sawyer, Access=Design

Ann is an architect who has specialised in inclusive design. Her book *The Access Manual* has recently been published in its 3rd edition and she has written many other design and policy guidance documents on inclusive design. She is also a member of the LLDC Quality Review Panel. www.accessdesign.co.uk

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Report for: Regulatory Committee

Item number:

Title: Planning Services 2015/16 and April 2016/17 update

Report authorised by : Stephen Kelly

Lead Officer: Emma Williamson, emma.williamson@haringey.gov.uk, 5507

Ward(s) affected: N/A

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

1. Describe the issue under consideration

A report on the work of the Planning Service in 2015/16 and April 2017

2. Recommendations

- a) That this report be noted; and
- b) that the committee agree to the change to the scheme of delegation proposed to allow for Chair's discretion for Council own applications to be delegated decisions; and

3. Reasons for decision

In order to ensure that there is sufficient time on the Committee Agenda to deal with major and contentious applications.

4. Alternative options considered

Most of this report is for noting and as such no alternative options were considered for these elements. In relation to the scheme of delegation the alternative of leaving the scheme as it is now was considered however was not followed due to the need to ensure that the committee has time to consider major and contentious applications. Consideration was also given to specifying categories of applications that could be delegated however it was felt that this was too restrictive.

5. 2015/16 and April 2017 work report

Development Management

- Applications to date **2015/2016: 3907 & April 2016: 330**
- Applications in same period **2014/2015: 3479 & April 331**
- Number of cases on-hand end **2015/2016: 729 & April 2016: 686**
- Appeals decided **2015/2016: 64 & April 2016: 15**
- Appeals dismissed **2015/2016: 36 (56%) & April 2016: 11 (73%)**
- Cumulative performance
 - Majors **2015/2016: 100% (19/19) & April 2016: 100% (2/2)**

- Minors **2015/2016: 81% (356/438) & April 2016: 93% (39/42)**
- Others **2015/2016: 90% (1540/1707) & April 2016: 93% (102/110)**
- PSO **2015/2016: 84% (1273/1515) & April 2016: 83% (123/149)**
- Validation- **2015/2016: 3 days average & April 2016: 7days**

Performance overview

- 5.1 Performance has improved on determination of applications in time despite the increases in the number of applications over the year. Inroads have also been made into the backlog with the number of applications on-time reducing. The workloads of officers, although reduced through the new systems thinking approach and by recruiting an additional officer do still remain high. Performance on validation has dropped significantly in April. This is due to the support team being short staffed following the resignation of a member of staff and delays in subsequent recruitment as well as annual leave and the impact of the planning solutions work.

Pre-application advice

- 5.2 In 2015/16 there were 258 pre-application meetings generating a total of £194,000 of income and in April 2016 demand has remained consistent with 2015/16 and there have been 23 pre-application meetings generating a total of £23,000 of income. In 2015/16 there were 222 householder pre-application meetings generating £35,000 of income and again demand has remained consistent with 2015/6 and there have been 23 householder pre-application meetings on April generating £4,000 of income.
- 5.3 The use of Planning Performance agreements has continued to increase and in 2015/16 the service received £148,000 in income from these agreements on 14 schemes, with a further £70,000 due to be paid. In April 5 further PPA's have been agreed with developers amounting to approximately £180,000 although the income has yet to be received.
- 5.4 Meeting the 10 day deadline following pre-application meetings for providing responses has proved challenging and this target has now been increased to 21 days following the meeting. In some cases this has still proved challenging due to staff workload on planning applications and the service is looking at ways to combat this. This includes shortening the length of responses, which developers have indicated they support and implementing systems for officers and managers to be reminded of deadlines. Where complaints have been made regarding lateness of responses partial refunds of the pre-application fee have been offered.

Systems Thinking (Planning Solutions Team)

- 5.5 The Planning Solutions team was established in December 2015 with 2 members of staff and a team leader and has now been expanded to 3 members of staff with a team leader with another member of staff to join shortly. It is currently operating in Woodside, Noel Park, St Ann's, Harringay, Bounds Green and West Green wards. It is expected that this system will roll out across the borough by December 2016.

5.6 The key principles of this approach are:

- Aiming to assess an application on day 1 rather than just validating it
- Not validating an application if it is not acceptable
- Making a decision as soon as possible after consultation ends

5.7 This means that the metrics used to measure the data differ to that in the conventional system. The application end to end time (ie date deemed valid to date of decision) is the key metric rather than the % of applications determined in-time.

5.8 The PST team has received 213 applications of which 165 have been decided. In January and February the average days to a decision were 29 and 33 respectively and in March and April these have risen to 42 and 41 respectively. These end to end times are significantly lower than those in the rest of service. However we had hoped to reduce end to end times to 30 days. Performance has been influenced by a number of factors including the inability to stop sending consultation letters because of a delay in adopting the amended Statement of Community Involvement (SCI) that would allow for this due to a Judicial Review which was unsuccessful, IT and data management issues, the inclusion of some cases with section 106 agreements that have increased decision times and expanding the geographical scope of the team too quickly as well as a bulge in submitted applications. The Corporate Delivery Unit are assisting the service in reviewing the roll-out so far and putting in place measures to assist in managing performance going forward.

Planning Quality Framework

5.9 Haringey is taking part in the Planning Quality Framework which is coordinated by Planning Advisory Service. This provides us with an opportunity for us to compare our performance data with other similar local authorities and also for us to gather customer satisfaction data. We are awaiting the comparable data however the data for Haringey is set out below:

AGENTS SATISFACTION RATES 2015/2016: 79%

APPLICANTS SATISFACTION RATES 2015/2016: 67%

NEIGHBOURS SATISFACTION RATES 2015/2016: 58%

Planning Decisions

5.10 The planning Committee met 15 times over 2015/2016 and considered a total of 38 applications. It has approved 35 and refused 3. Of the applications refused, 1 was subsequently the subject of an appeal, which was withdrawn (St Anns Police Station) after a revised application was approved by committee. In one of these cases partial costs were awarded against the Council.

Planning Enforcement

- Complaints received 2015/16 **952**
- Complaints received April 2016 **70**
- Enforcement notices served 2015/16 **115**

- Enforcement notices April 2016 15
- 5.11 Improvement of the planning enforcement team is ongoing and performance has improved significantly over the year with notifications of decisions within 8 weeks as follows: 2015/2016: 96% (943/986) & April 2016: 100% (53/53).
- 5.12 In 2016/17 the consultation on, and subsequent adoption of, a new Enforcement Plan which sets the priorities for the Borough with regards to enforcement action is a priority.

PLANNING POLICY

Haringey Local Plan

- 5.13 2015 has seen steady progress being made on Haringey's emerging Local Plan, which includes the alterations to the Strategic Polices DPD, and replacements for the saved UDP polices with a Development Management Polices DPD, Site Allocation DPD and Tottenham Area Action Plan.
- 5.14 Consultation took place on the preferred option versions of the document early in the year (January – February 2015). This required significant engagement with a range of land interests, community groups and infrastructure providers. In addition, we held six 'drop-in' sessions across the borough and presented at a further 18 public events over the consultation period. In total, we received almost 700 individual representations making in excess of over 6,000 individual comments/proposed changes to the Plan. Much of the year was therefore taken up with reviewing and responding to the comments received, gathering further evidence, and firming up the position for certain sites and policies.
- 5.15 The revised documents - the pre-submission versions - gained full Council approval in November and were published for Regulation 19 consultation in January – March 2016. The Pre-submission documents, along with the representations received (424 in total) and the Council's response to each, are to be submitted to the Secretary of State in May for Examination in Public. The public hearings are likely to take place over the summer and, if found sound, all four documents will be reported back to Full Council towards the end of the year for formal adoption.
- 5.16 In addition to the above documents, work has also commenced on a Wood Green Area Action Plan (AAP) with Issues & Options consultation taking place in February – March 2016. 27 statutory responses were received, along with over 1000 other responses to drop-ins jointly organised by the Council and Soundings in Wood Green over the consultation period. The AAP recognises the development potential of the area, which includes significant Council landholdings, and the opportunities therein to strengthen the status of the Wood Green Metropolitan town centre. Four broad development options were promoted for consultation based around different levels of intervention, including a single more centrally located Crossrail 2 station to serve the area. Further analysis of the comments received and evidence gathering is underway, with a Preferred Option draft of the AAP due towards the end of summer 2016.

- 5.17 The service also continues to support the preparation of the Joint North London Waste Local Plan, which under went preferred option consultation in July 2015 and which is due to come forward for pre-submission consultation in Summer 2016. The service is also responding to Government proposals for the implementation of planning and housing reforms, including the proposals for 'Starter Homes'.

Neighbourhood Planning

- 5.18 The policy team have also supported the Highgate Neighbourhood Forum in the progression of the Highgate Neighbourhood plan which was published at the end of 2015 for consultation prior to submission to the Council – expected in mid 2016. The policy team have also provided advice and support for the recently recognised Neighbourhood Forum for Crouch End, who are expected to begin work on the preparation of a Neighbourhood Plan for that area in 2016. Public consultation could take place towards the end of 2016.

Other work

- 5.19 An Article 4 Direction restricting rights to convert warehouses to residential is currently being consulted on.
- 5.20 Planning Policy has processed 1 unsuccessful nomination for an Asset of Community Value, and two are currently pending decisions. In 2015 there were five successful ACV nominations, and no unsuccessful ones.
- 5.21 Additional evidence on open space, Gypsies and traveller needs, to support the production of the Wood Green AAP, and Tall Building SPD will be completed. Additionally input from Planning Policy will be required into other corporate documents, notably: the Housing Strategy, Affordable Housing Enabling, Housing Infill/Small Sites, Estate Renewal and Development Vehicle, Upper Lee Valley DIFS, Upper Lee Valley OAPF Update, Cultural Strategy, Economic Development Strategy, and Masterplans for Tottenham Hale, High Rd West, and Northumberland Park. It is anticipated that there will be work undertaken to support the production of the next version of the London Plan. This includes in 2016 updating the Strategic Housing Land Availability Assessment, and Town Centre Healthchecks.

S106/CIL

- 5.22 The service took part in the 'Scrutiny in a day' on Community Infrastructure Levy (CIL) and these findings are being reported by the Housing and Regeneration Scrutiny Panel to Cabinet on May 16. One of the recommendations is for the CIL to be reviewed in 2016 and this will be reported to the Scrutiny Panel in due course.

Viability

5.23 The Service recently took part in the 'Scrutiny in day' on Housing Viability and will incorporate the outcomes and findings of this review in its work programme going forward.

Conservation

5.24 A brief update is below:

Noel Park

- Recently adopted the new appraisal and management plan and amended CA boundary
- Will now seek to extend the relevant Article 4 direction to cover the whole estate

Conservation Area Appraisal and Management Plans for the Tottenham High Road Historic Corridor

- 6 conservation areas: North Tottenham, Scotland Green, Bruce Grove, Tottenham Green, Seven Sisters/Page Green, and South Tottenham
- Cabinet to approve public consultation on all 6 in September
- Work being carried out by our consultants

Complete Review of Local List

- Working in Conjunction with the CAACs
- Currently in the early stages of project

Transportation

5.25 The team has made major contribution to supporting planning officers in dealing with their very high number of planning applications as well as providing input at the pre-application stage. The team provided comments to over 400 applications.

5.26 The team has supported the delivery of regeneration in Tottenham and Wood Green through the provision of transport planning advice and participation in a range of delivery groups. It has led on the Council's input to Crossrail 2 which, if approved, would transform access and capacity across much of the Borough. In addition the team has worked to secure improvements to the Barking Gospel Oak line and to support enhancements to the West Anglia main line through Tottenham Hale and Northumberland Park.

5.27 The team has worked with the Smarter Travel team to deliver personalised travel planning in the Harringay/St Ann's area of the borough. The team is leading on measures to mitigate the impact of motor traffic such as setting up a car club contract, supporting the use of electric vehicles through BluePoint London and point to point car hire through Drive Now.

5.28 Following a successful bid in October TfL has allocated £2.3m LIP funding for transport projects in December for delivery in 2016/17. Transport planning has

led on planning of cycle routes, provided input to bus service planning and commenced work on developing a Transport Strategy.

BUILDING CONTROL

- Fee earning Applications received 2016 - 1252
- Fee earning Applications received 2015 - 1322
- Fee income from applications 2015 – £569k
- Fee income from applications 2016 – £637k

5.29 Against a challenging background, the Building Control Service has continued to provide valued customer services. Although applications over the year have slightly decreased the reach of the service has continued to increase, (following a protocol for BC across London) with the service inspecting and considering 38 applications for development beyond the Borough boundary. Fee income has also increased, partly due to larger projects, such as St Lukes, Hornsey Depot and THFC being on site. Work on the THFC stadium continues apace and the coming 12 months will be very difficult balancing the new building works whilst maintaining the safety at the existing stadium. Building Control continue to issue the Safety Certificate and monitor compliance on a match by match basis.

5.30 Dangerous Structures have again been ever prevalent, both within normal office hours and outside office hours (including seven callouts on Easter Monday!), with the team has been “called upon” over 230 times this year, from emergencies including partial demolition of buildings by vehicles to rectifying poor workmanship where adequate temporary support was not provided. Notable enforcement cases have included the need to mass fill an unauthorised and unsafe basement in South Tottenham to removing partially collapsed scaffolding.

5.31 BC consult continues to grow in stature providing affordable expert advice to other Council services. This advice ranges from party wall agreements to feasibility studies to structural surveys to structural repairs to bridge inspections and strengthening to highways related works and so on. The consultancy work continues to grow and is widely used by colleagues in Homes for Haringey and is now well respected throughout the Council. This growth has also been reflected in the fee income for this service.

MEMBERS

5.32 A member training programme is currently under development.

Revised scheme of delegation

5.33 A revision to the scheme of delegation is proposed to be taken to Standards Committee in June, for recommendation to full Council thereafter. This is in respect of applications made by the Council. The Scheme of Delegation was amended in 2014 to add a requirement that all applications where the Council is the applicant be required to be taken to committee for determination. An amendment is proposed such that the Chair can agree that a delegated

decision can be taken on applications made by the Council. Council applications where delegated decisions are proposed will be recorded on a form for discussion with the Chair at regular liaison meetings. The decision will be made by the Chair and the decision recorded on the form and the form will be saved to the case file. This change is proposed in order to ensure that the committee has enough space on its agenda for major and contentious applications. A tracked changed version of the scheme of delegation is appended in Appendix three.

STAFFING

5.34 Advertisements for 17 posts across the service were placed in Jobs Go Public and Haymarket on 12 April 2016 as well as on the Haringey Website in 8 April. The closing date for application was 1 May 2016. 117 applications were received and 25 people have been shortlisted. It is anticipated that interviews will take place in the last week of May and the first two weeks of June.

PERFORMANCE AND CONTINUED IMPROVEMENT

5.35 The service has committed to be top quartile in London for speed, quality and cost. The service is top quartile for Majors and Minors. The attached appendix explains how the service is progressing in the realisation of this objective and reflects reporting undertaken to the corporate performance board. (see appendix 1 and 2). These figures cover 2015/16 and April 2016.

5.36 The service has refreshed its Improvement Plan to ensure continuous improvement and is currently working up a Transformation Funding bid in order to fund some of its activities. Notable items in this plan include design and delivery of a training programme for staff at all levels and further improvement activity in the Enforcement Service.

6. Contribution to strategic outcomes

The Planning Service contributes to outcomes in Priority 4 and 5.

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

The Assistant Director of Corporate Governance has been consulted in relation to changes to the Planning Committee scheme of delegation. Changes to the Planning Committee scheme of delegation require a change to the Council Constitution. Any proposed change will therefore need to be referred to Standards Committee and then full Council for approval.

8. Use of Appendices

Appendix 1 and 2 Development Management and Planning Enforcement performance data
Appendix 3 Proposed amendment to Scheme of Delegation

9. Local Government (Access to Information) Act 1985

Planning Applications are on the Planning Register on the Council's website and the Local Plan Documents are also on the Council's website.

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DM Board (Speed, Quality & Cost stats)

Planning service - towards 'Top quartile in London/England'

March 2016



Summary dashboard



Performance on majors measured over the two years rolling is now in the top quartile.

Performance on minors and others is still variable but has improved since the dip in the summer and is now in the top quartile in London.

Performance on discharge of conditions is improving although further improvement is needed. Further work with internal consultees is planned.

One major application has been overturned at appeal and one had a split decision in the last two years.

Performance on validation has significantly improved. A spreadsheet to allow automatic allocation has been developed and implemented which has led to substantial improvements in performance in validation.

Although enforcement requires further work to reach target. Substantial improvements have been made in all areas.

This is Amber because of enforcement.

Preliminary results from the Resources Review suggest that DM is at 75% cost recovery

Workforce / Caseloads Amber /Green

The number of applications on hand is still high but has stabilised. Some inroads have been made into the backlog.

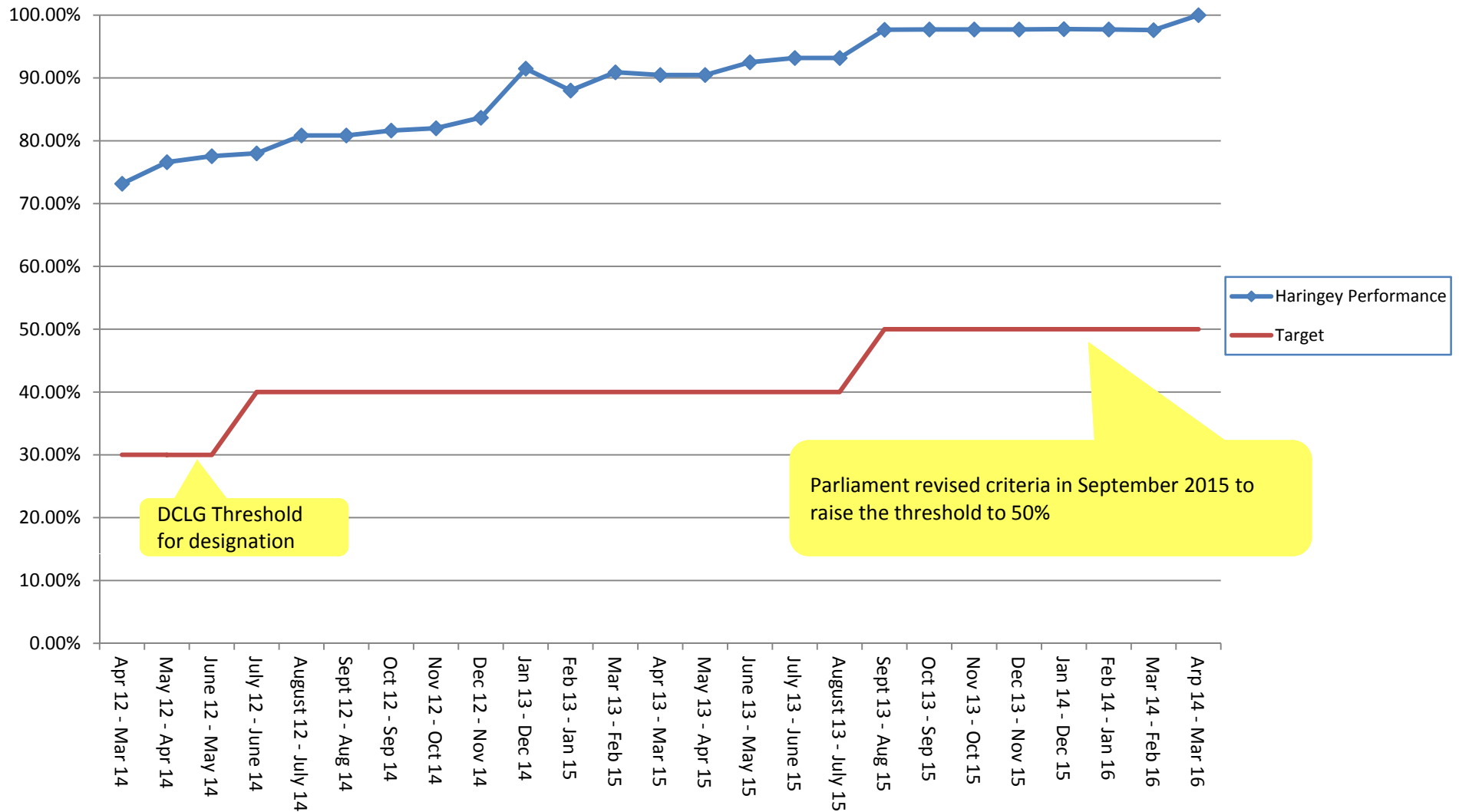
Speed Indicators

-
- Major planning applications decided within 13 weeks over a 2 year period
 - Percentage of Major applications determined within 13 weeks
 - Percentage of minor applications determined within 8 weeks
 - Percentage of others applications determined within 8 weeks
 - Percentage of Approval of details (Discharge of conditions) determined within time
 - Average number of days to make a decision

Speed of decisions – DCLG Measurement: Major applications decided within 13 weeks over a 2 year period



Threshold: 50% Current performance: 100%



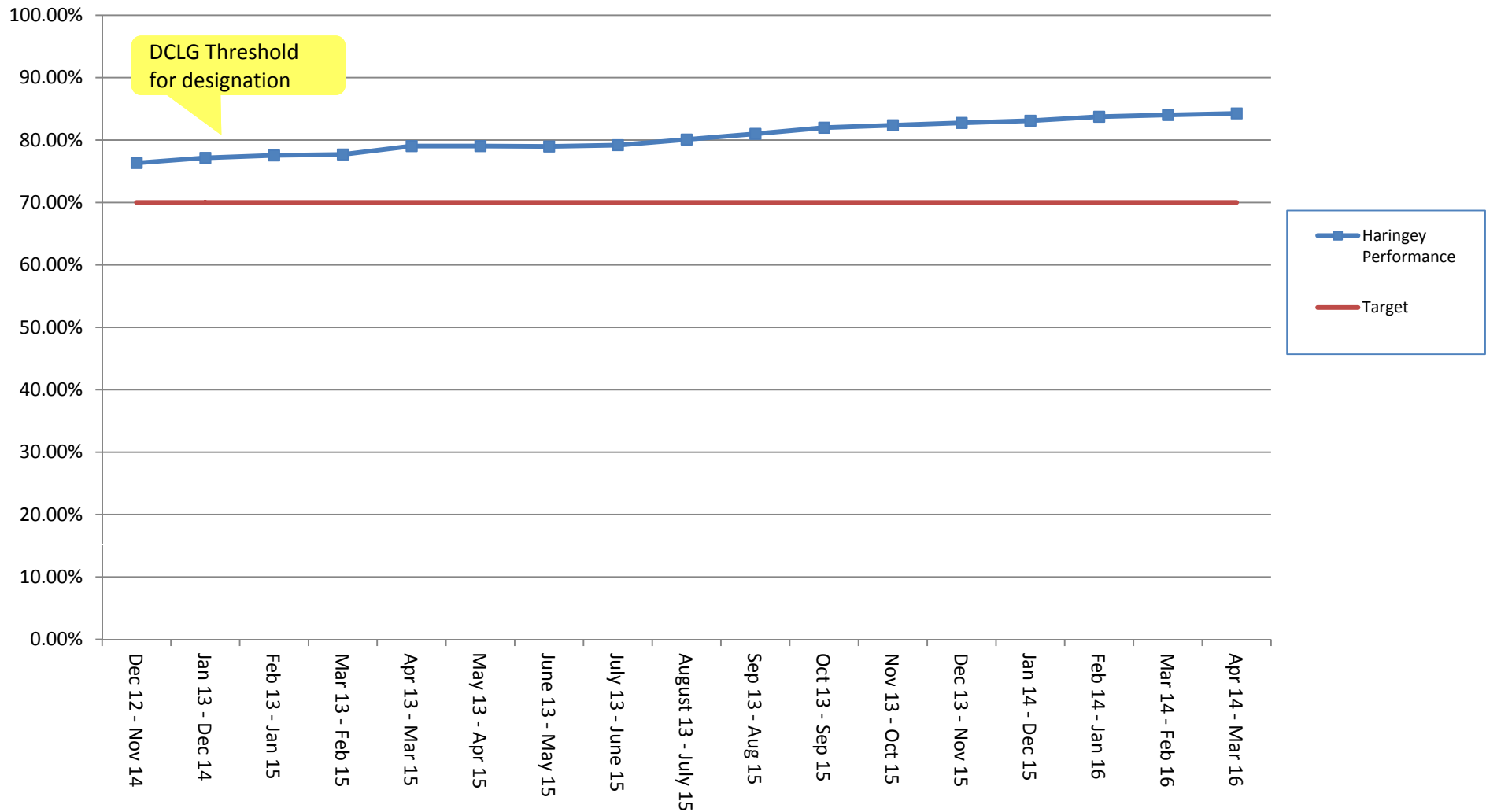
DCLG Threshold for designation

Parliament revised criteria in September 2015 to raise the threshold to 50%

Speed of decisions – DCLG Measurement: Minor / Other applications decided within 13 weeks over a 2 year period



Threshold: 70% Current performance: 84%



Performance on 'Major' applications determined within 13 weeks, or within an agreed extension of time or Planning Performance Agreement



Percentage of Major applications determined within 13 weeks

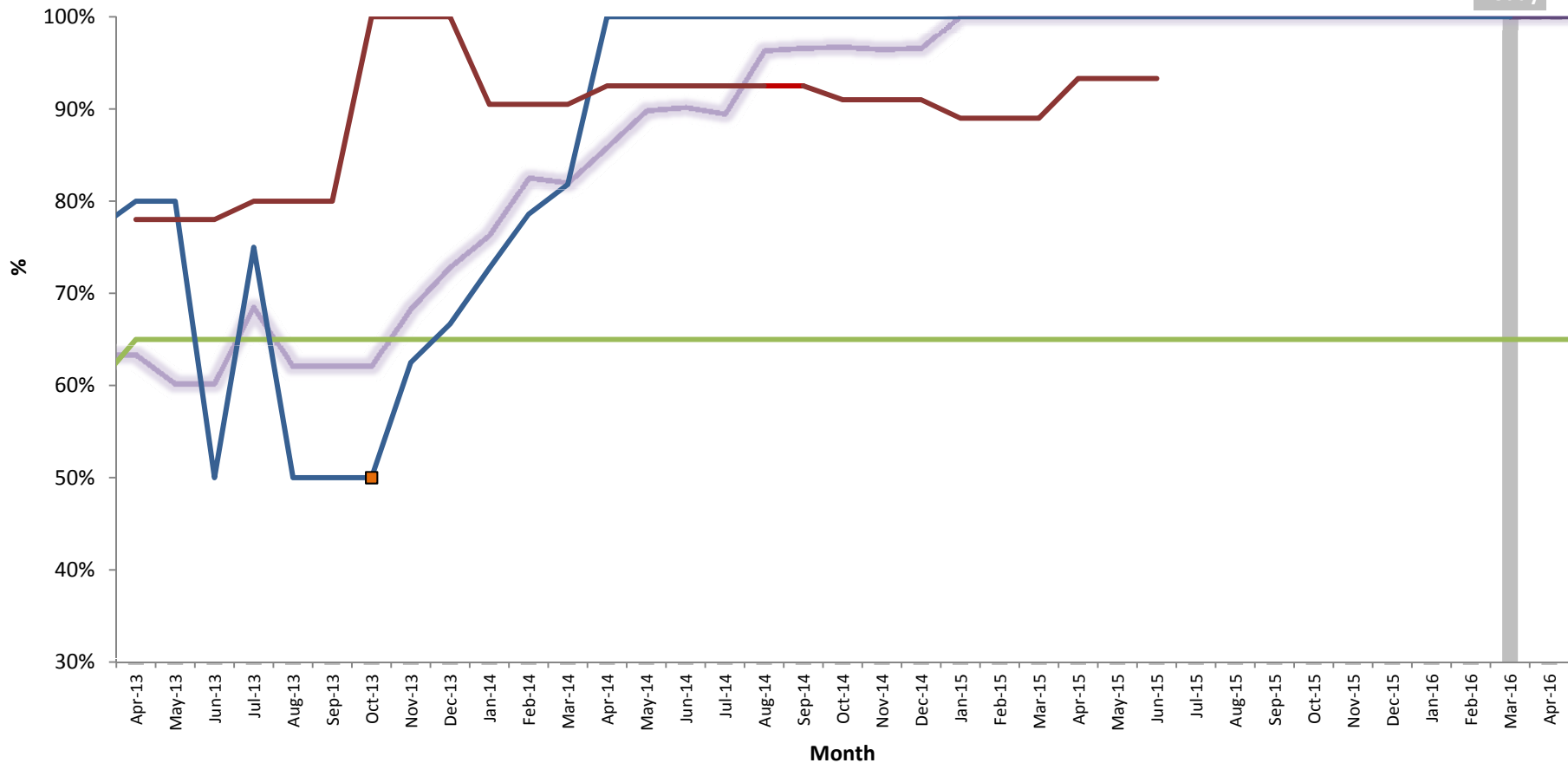
Target: 65% Current performance: 100% (cumulative for current financial year)

Percentage of planning applications processed in 13 weeks (Major)

Year to date

Good performance is high

Today



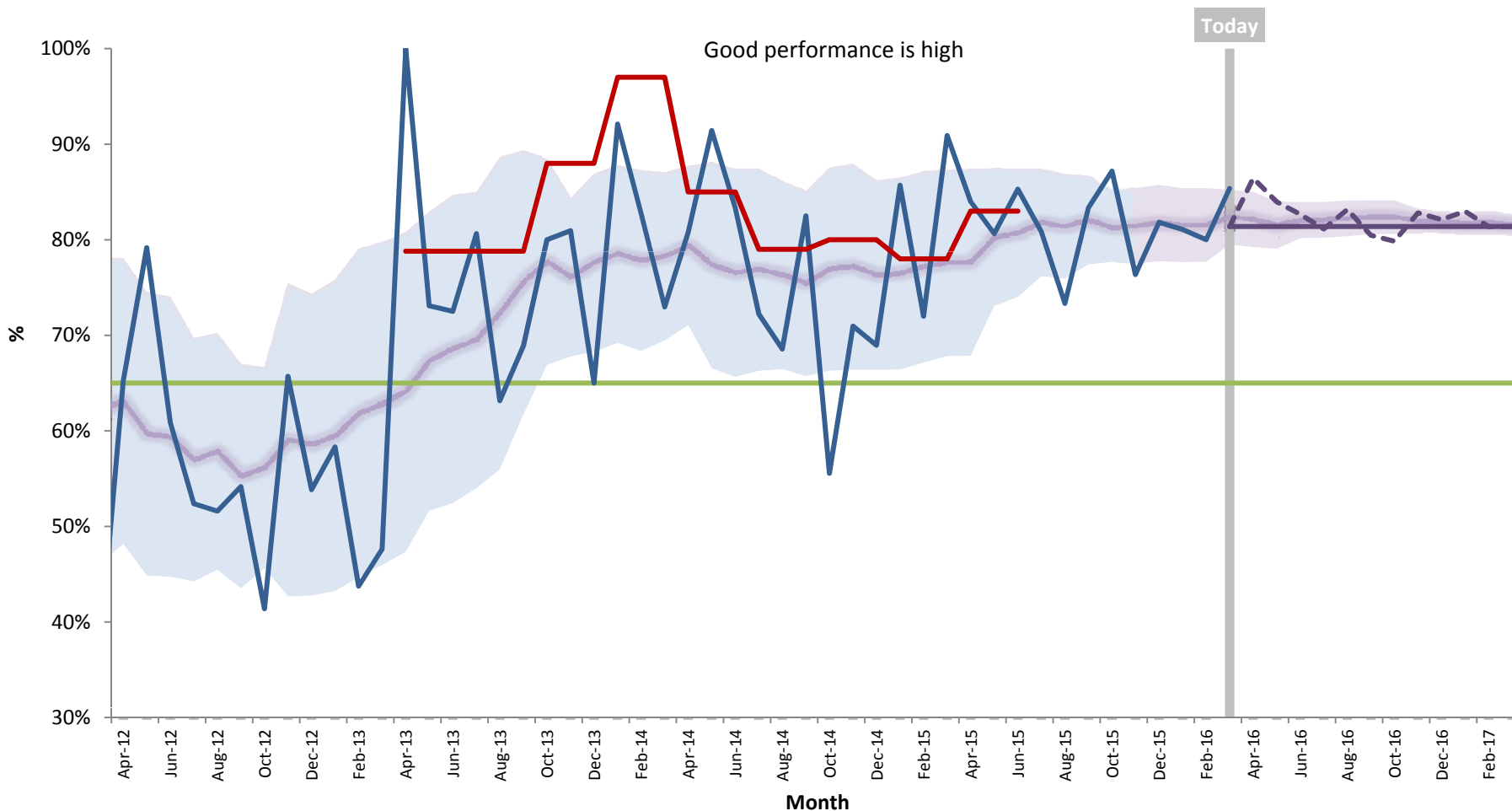
Performance on 'Minor' applications determined within 8 weeks, or within an agreed extension of time



Percentage of Minor applications determined within 8 weeks
 Target: 65% Current performance: 81% (cumulative for current financial year)

* Applications subject to a PPA or an agreed extension of time are included in these figures.

Percentage of planning applications processed in 8 weeks (Minor)



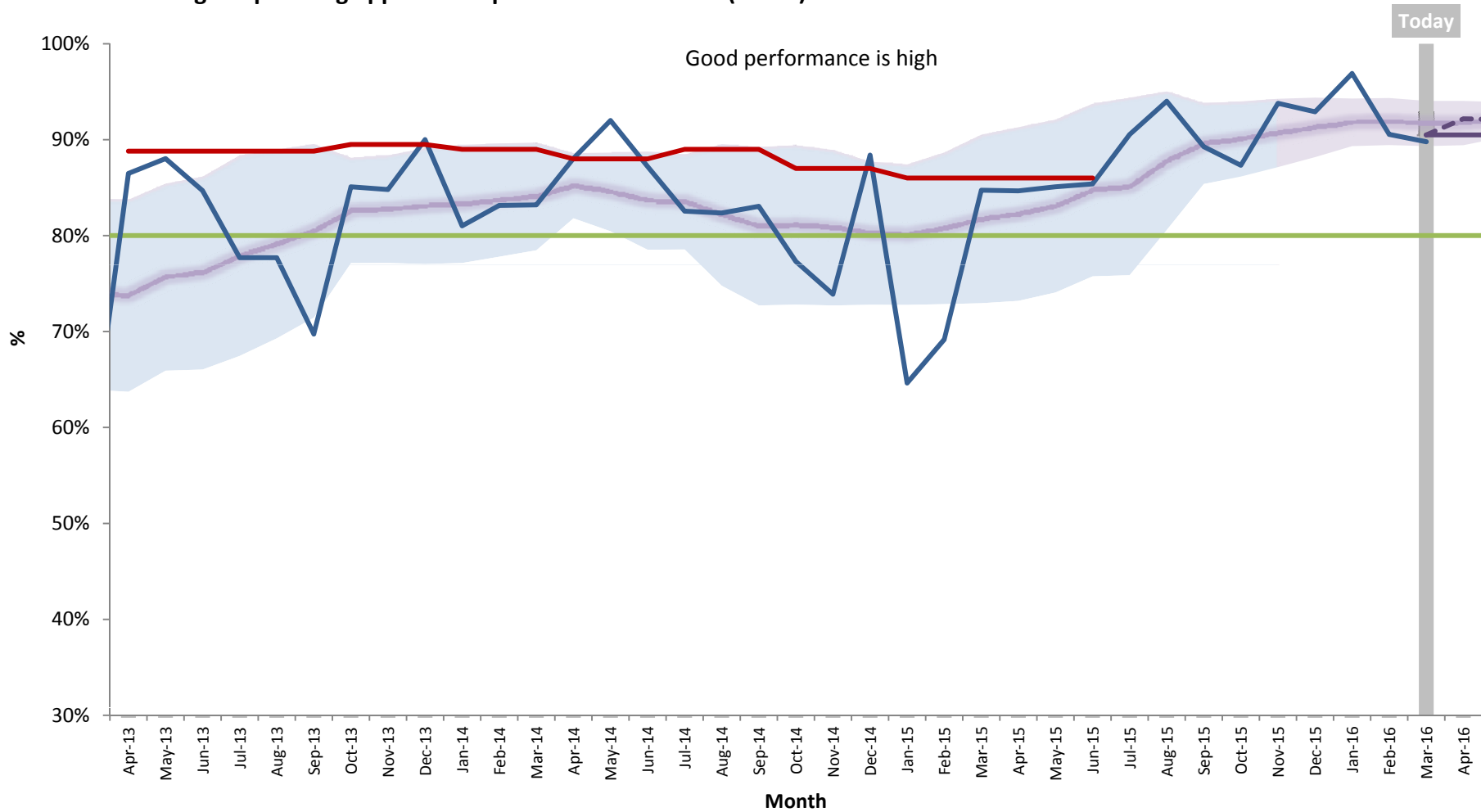
Performance on 'other' applications determined within 8 weeks, or within an agreed extension of time



Percentage of others applications determined within 8 weeks
 Target: 80% Current performance: 90% (cumulative for current financial year)

* Applications subject to a PPA or an agreed extension of time are included in these figures.

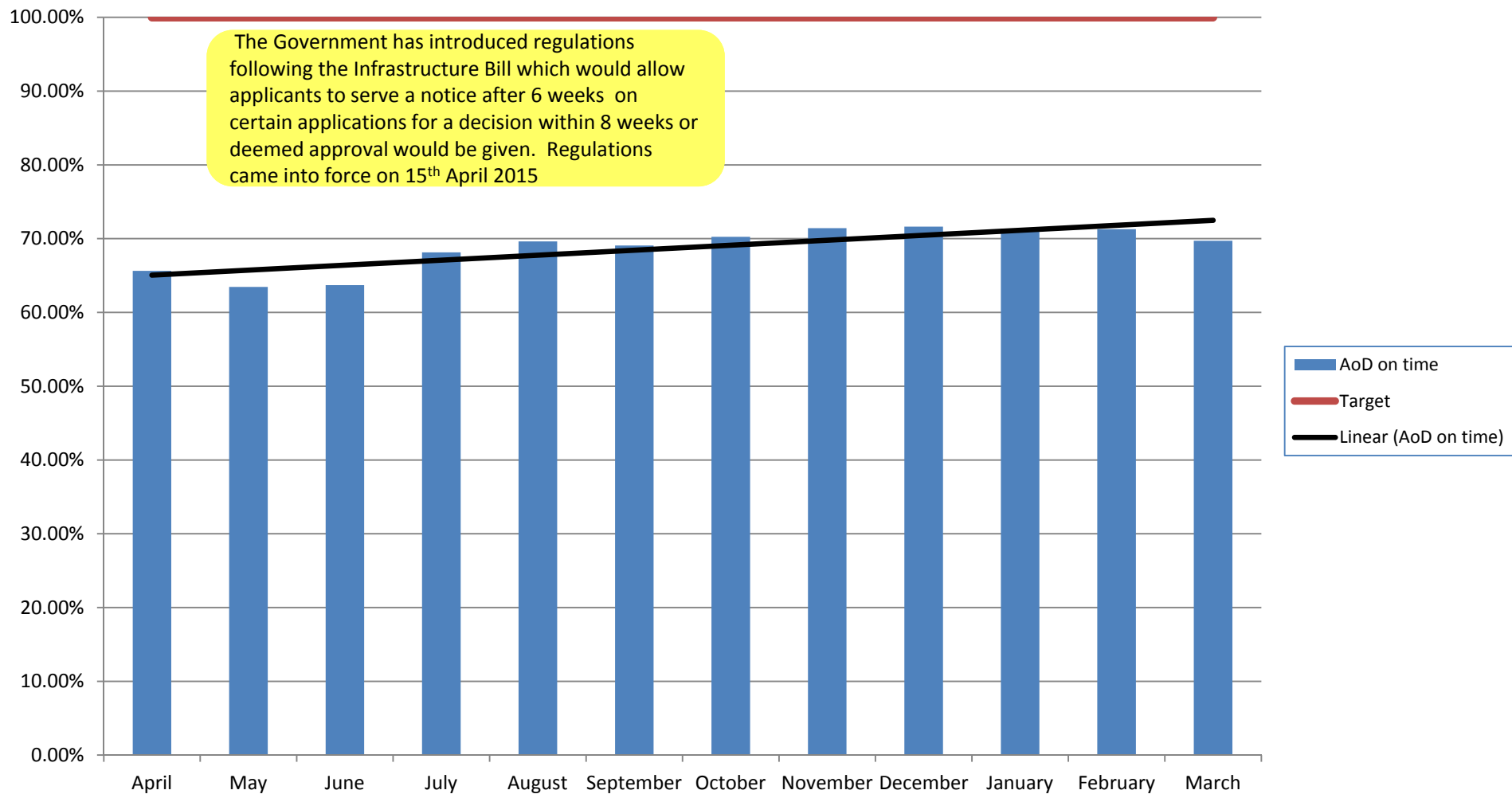
Percentage of planning applications processed in 8 weeks (Other)



Percentage of Approval of Details planning applications determined within time

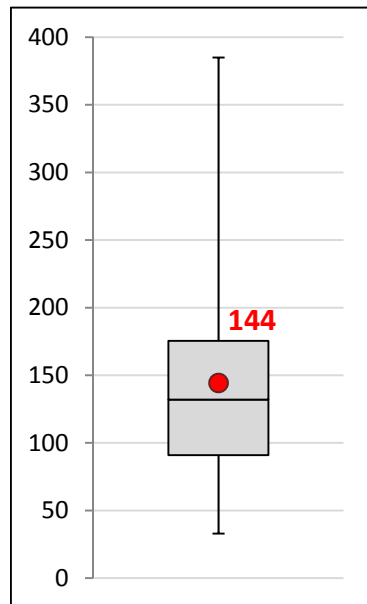


Target: 100% Current performance: 70% (cumulative for current financial year)



**Major Planning Applications:
Days taken from receipt of a valid application to date of decision issued**

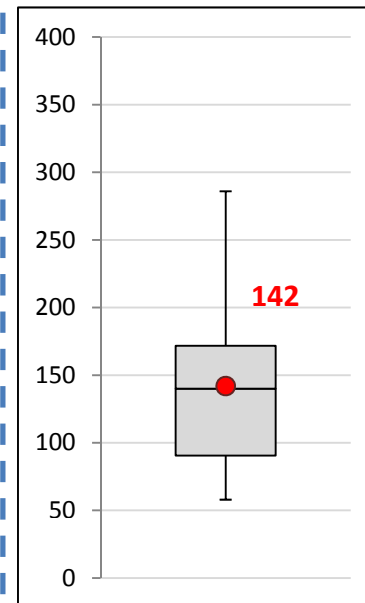
Majors performance Apr-Mar 2015-2016
- 19 Majors decided -



- Average days: 144
- Most days taken: 385
- Least days taken: 33
- Most frequent day number: 132
- Most decisions between 91 and 176 days

12 of the 19 decisions (63%) were decided within a PPA

Majors performance 2014-2015
- 20 Majors decided -

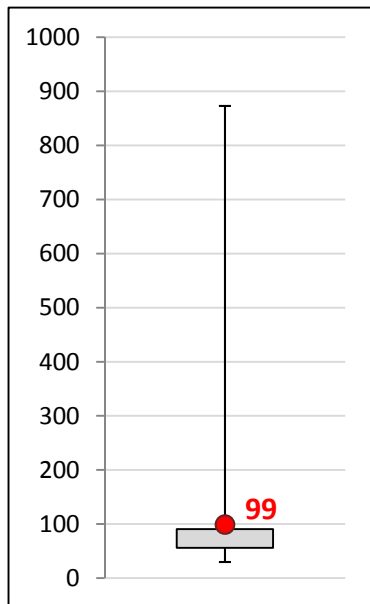


- Average days: 142
- Most days taken: 286
- Least days taken: 58
- Most frequent day number: 140
- Most decisions between 91 and 172 days

14 of the 20 decisions (70%) were decided within a PPA

**Minor Planning Applications:
Days taken from receipt of a valid application to date of decision issued**

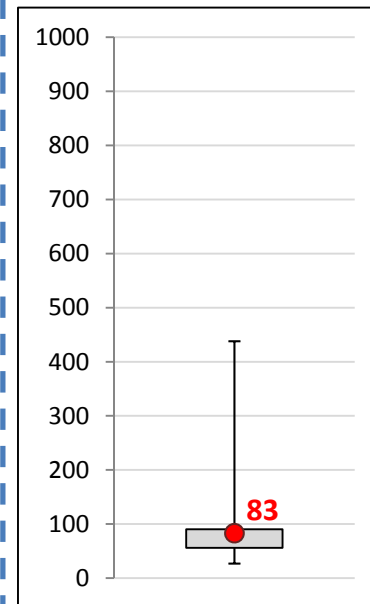
Minors performance Apr-Mar 2015-2016
- 438 Minors decided -



- Average days: 99
- Most days taken: 873
- Least days taken: 30
- Most frequent day number: 56
- Most decisions between 56 and 91 days

85 of the 438 decisions (19%) were decided within an extension of time

Minors performance 2014-2015
- 371 Minors decided -

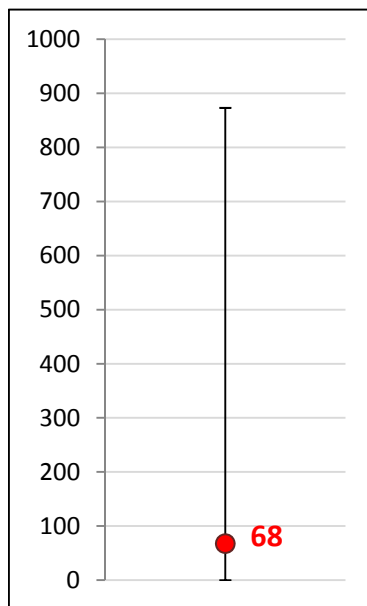


- Average days: 83
- Most days taken: 438
- Least days taken: 27
- Most frequent day number: 56
- Most decisions between 56 and 91 days

70 of the 371 decisions (19%) were decided within an extension of time

**Other Planning Applications:
Days taken from receipt of a valid application to date of decision issued**

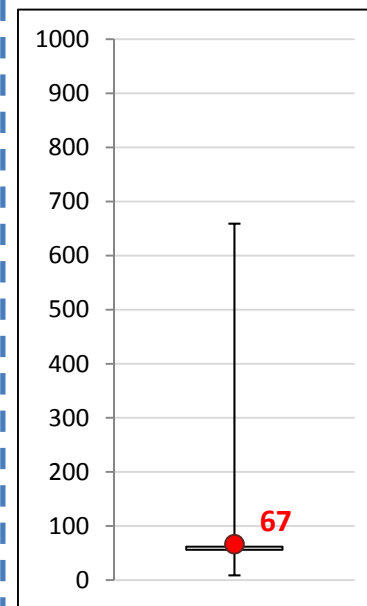
Others performance Apr-Mar 2015-2016
- 1707 Others decided -



- Average days: 68
- Most days taken: 873
- Least days taken: 0
- Most frequent day number: 56
- Most decisions made on 56 days

209 of the 1707 decisions (12%) were decided within an extension of time

Others performance 2014-2015
- 1858 Others decided -



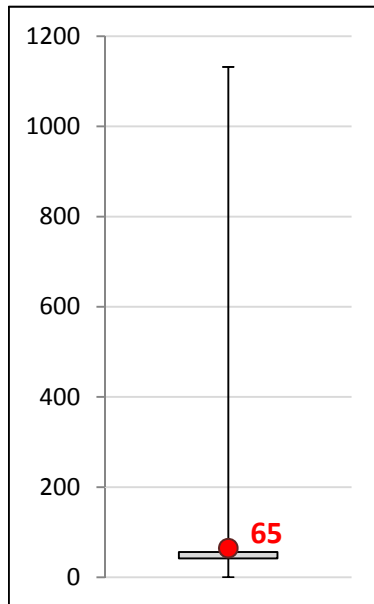
- Average days: 67
- Most days taken: 659
- Least days taken: 9
- Most frequent day number: 56
- Most decisions between 56 and 62 days

200 of the 1858 decisions (11%) were decided within an extension of time

**PSO Planning Applications:
Days taken from receipt of a valid application to date of decision issued**



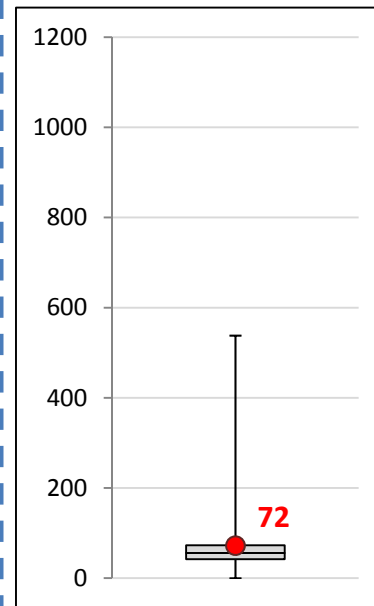
PSO performance Apr-Mar 2015-2016
- 1515 PSOs decided -



- Average days: 65
- Most days taken: 1132
- Least days taken: 0
- Most frequent day number: 56
- Most decisions between 42 and 56 days

41 of the 1515 decisions (3%) were decided within an extension of time

PSO performance 2014-2015
- 979 PSOs decided -



- Average days: 72
- Most days taken: 538
- Least days taken: 0
- Most frequent day number: 56
- Most decisions between 42 and 73 days

33 of the 979 decisions (3%) were decided within an extension of time

*PSO (includes discharges of conditions, trees, prior approval, non-material amendments , COLs, etc)

A grey arrow-shaped graphic pointing to the right, containing the word "Quality" in white text.

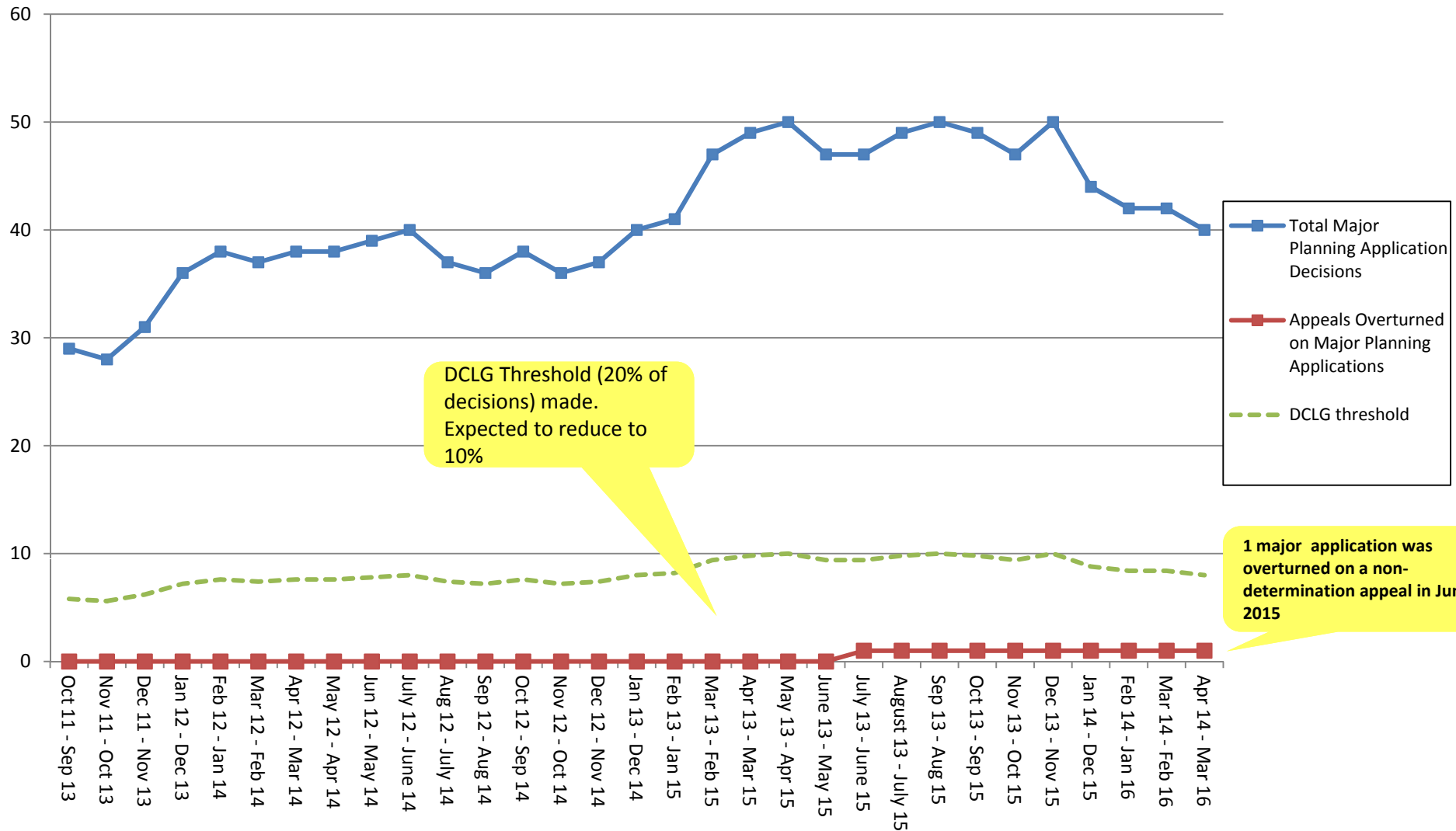
Quality

- The extent to which major applications are overturned at appeal over a two year period
- Days to make valid
- Days from declared Valid to Decision issued
- Percentage of Planning Enforcement Complaints on which a decision is taken within 8 weeks
- Percentage of complainants notified about the progress of the enforcement complaint decision within 8 weeks
- Number/percentage of Acknowledged enforcement complaints with in 24hrs
- Customer satisfaction

Quality of decisions – DCLG Measurement: Major applications overturned at appeal over a 2 year period



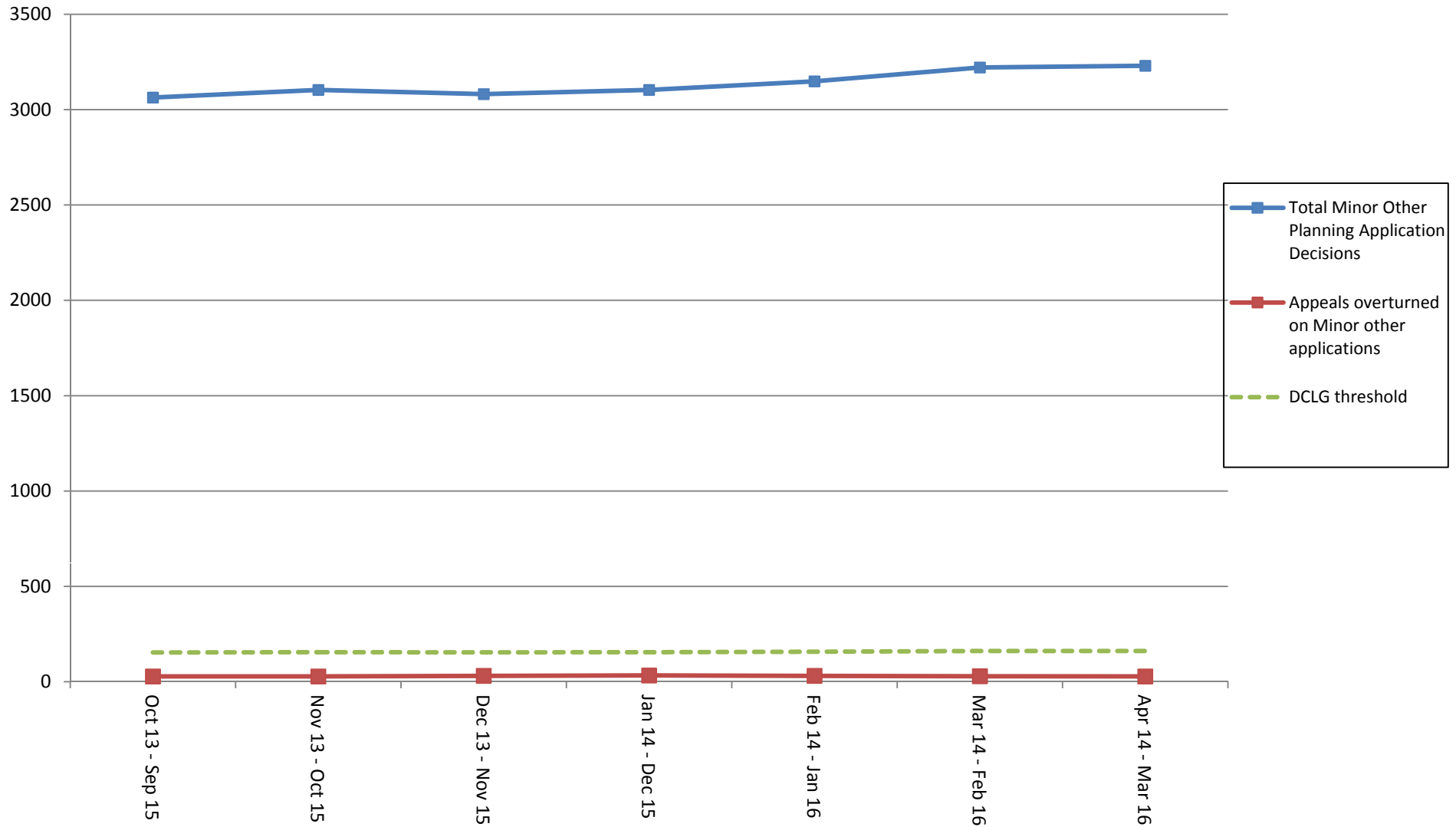
Threshold: 20% Current performance: 2%



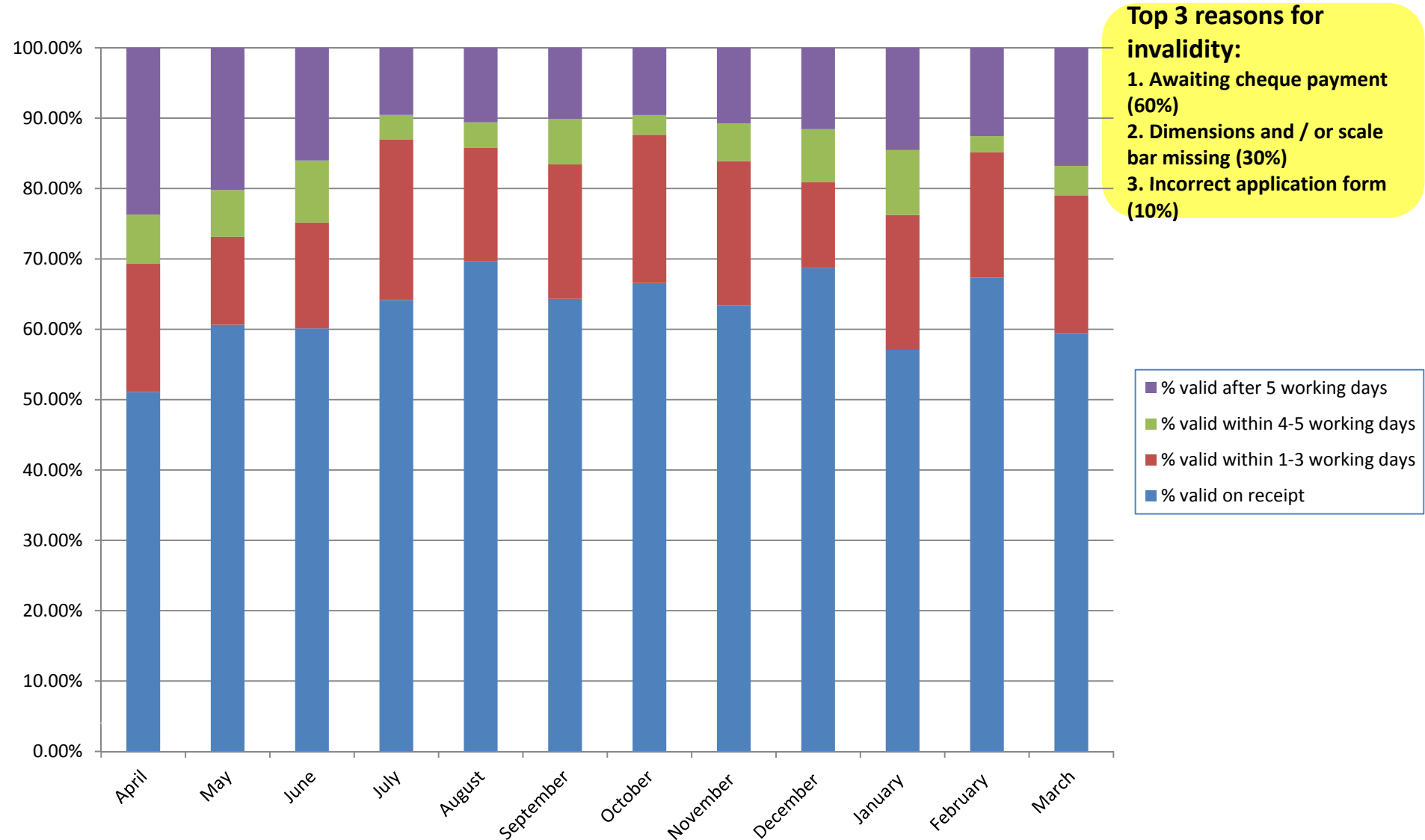
Quality of decisions – DCLG Measurement: Minor / Other applications overturned at appeal over a 2 year period



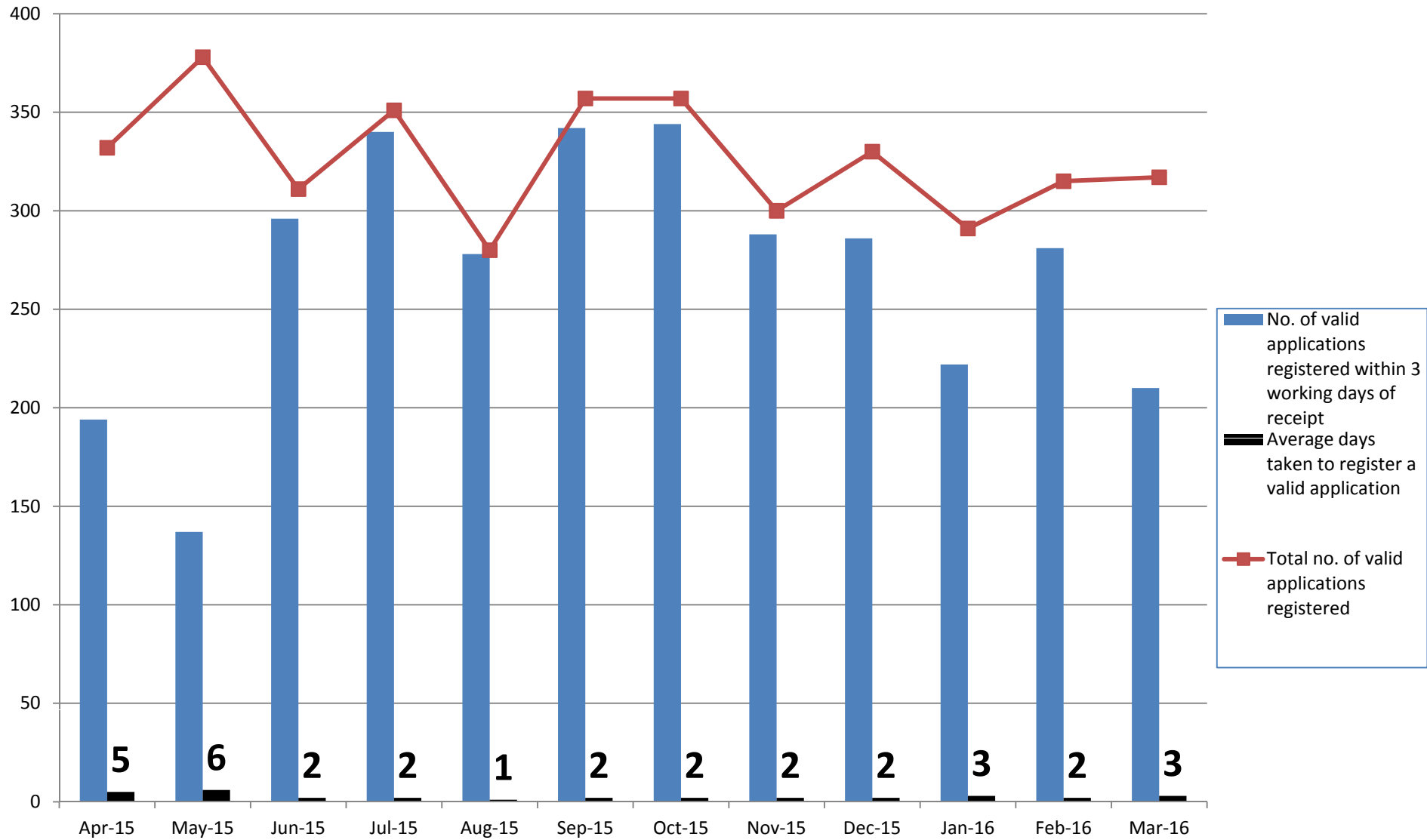
Threshold: 5% of all minor other decisions



Percentage of planning applications which are valid on receipt



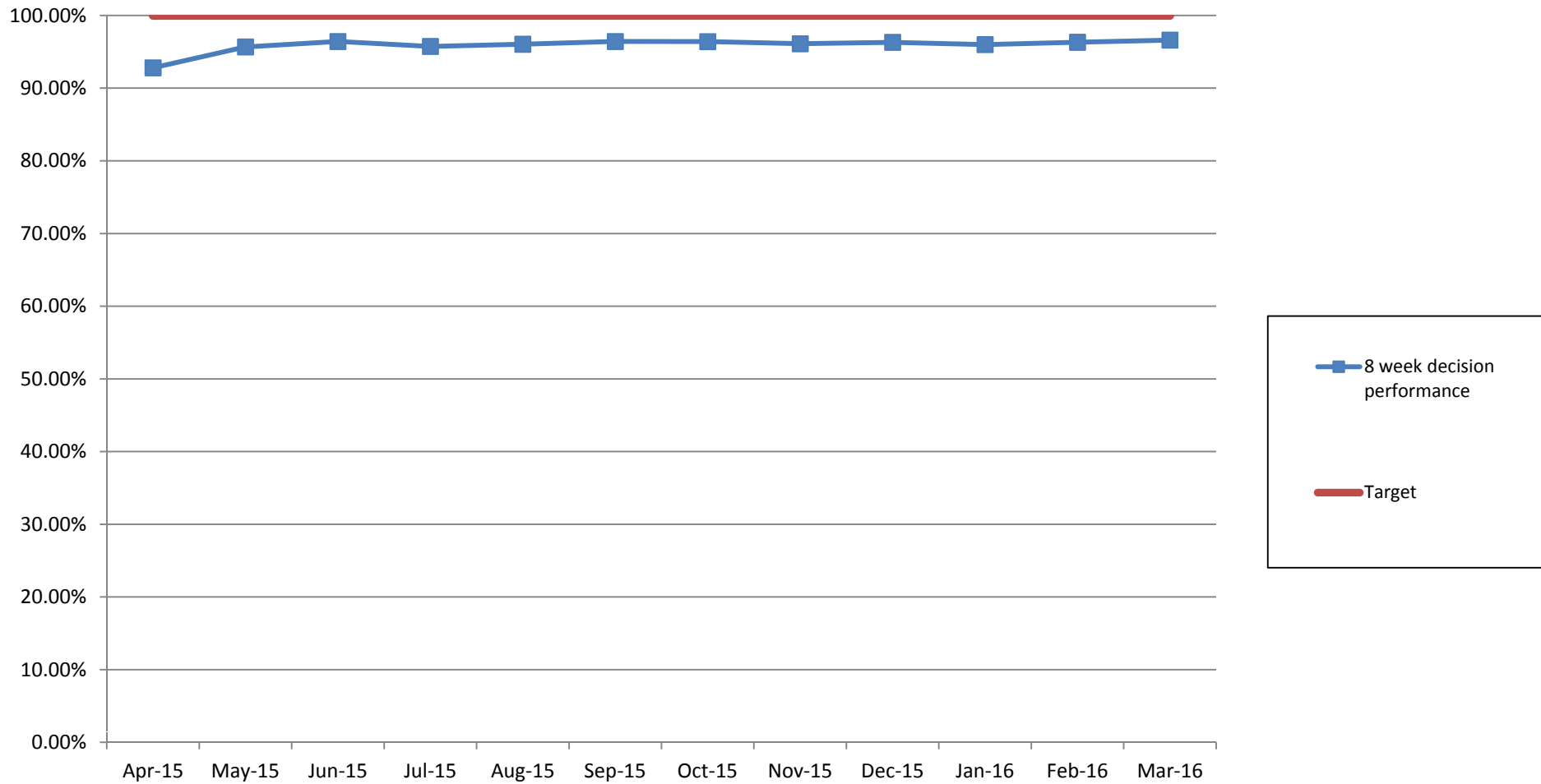
Average time taken to register a valid planning application



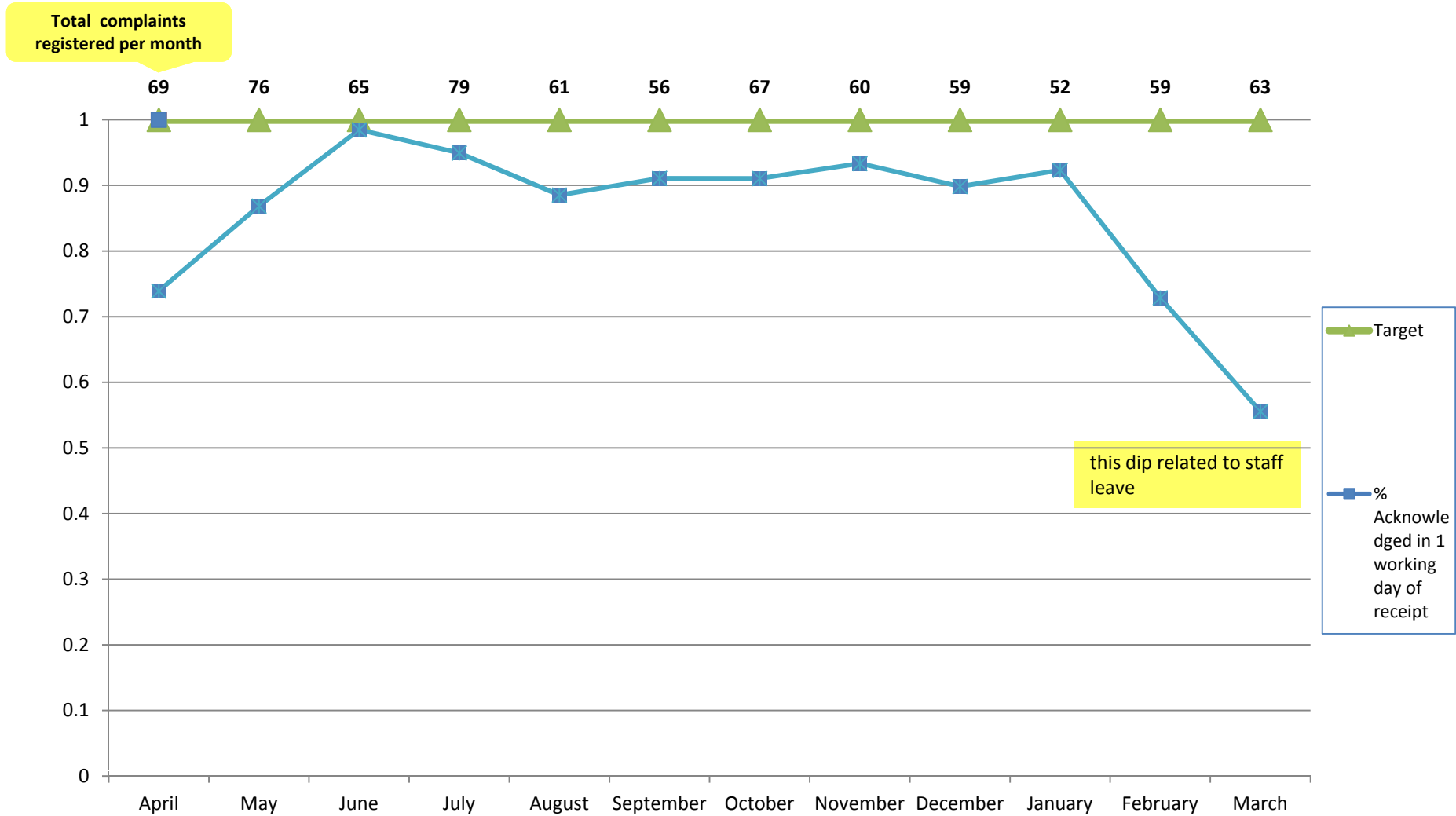
Percentage of Planning Enforcement Complaints on which a decision is taken within 8 weeks



Target: 90% Current performance: 97% (cumulative)



Number of Planning Enforcement Complaints acknowledged within 1 working day

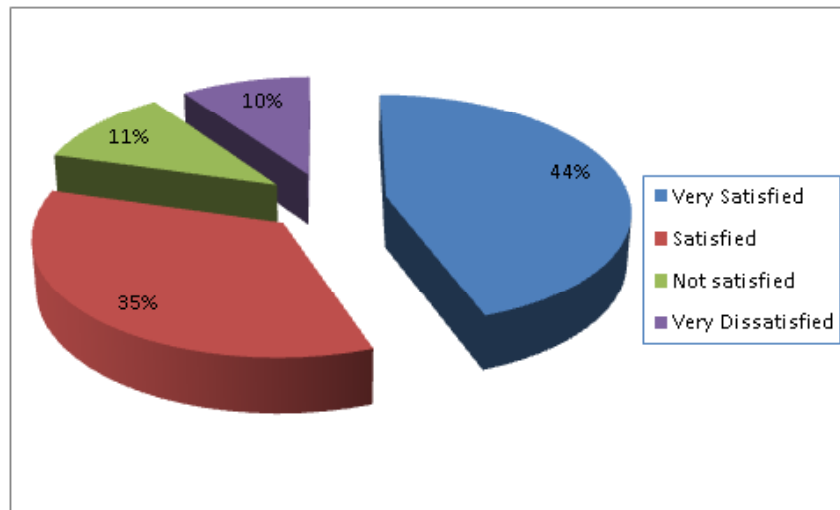


Customer satisfactions surveys for April – March 2016 showed that agents are overall 79% satisfied with the Planning Service



3376 surveys were e-mailed to agents which had received a planning decision between the 1st of April 2015 and the 31st of March 2016 : 230 surveys were completed (7%)

4 questions were asked in regards to helpfulness, use of time, use of information and clarity of decision



Overall satisfaction rating of 79% from agents

Highest scoring question from agents was in relation to clarity of decision – 86%

Lowest scoring question from agents was in relation to use of peoples time – 26%

Some mixed comments received including:

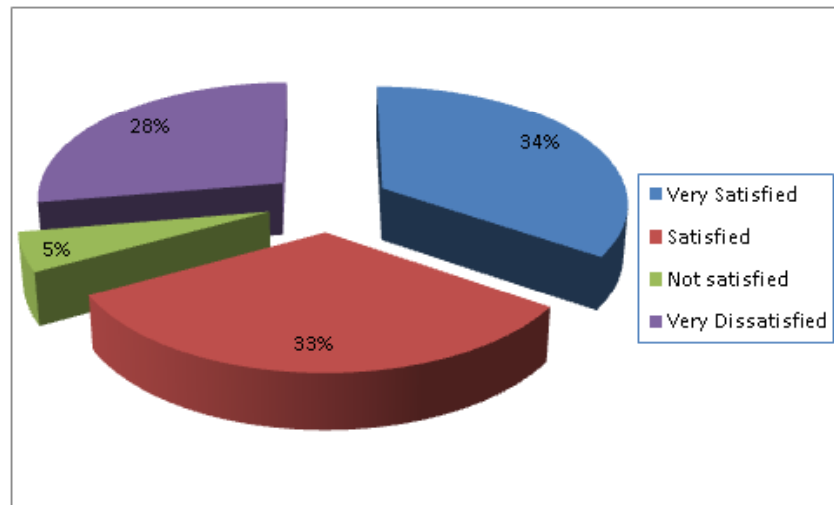
- We deal with lots of local authority planning departments and have to say that Haringey have so far been amongst the best.
- We have had a really positive experience that is not really frequent by dealing with other councils
- It would have been helpful to have returned my telephone call to keep me informed, or a least an email note with update and/or comments.
- One general comment on the time scale for the application, the council usually take 6-8 weeks for decision but really look at the application in the last week only. It would be better if they make the decision after the consultation period.

Corporate Delivery Unit

Customer satisfactions surveys for April – March 2016 showed that applicants are overall 67% satisfied with the Planning Service

895 surveys were sent to applicants who had received a planning decision between the 1st of April 2015 and the 31st of March 2016 : 88 surveys were completed (10%)

4 questions were asked in regards to helpfulness, use of time, use of information and clarity of decision



Overall satisfaction rating of 67% from applicants

Highest scoring question from applicants was in relation to clarity of decision – 82%

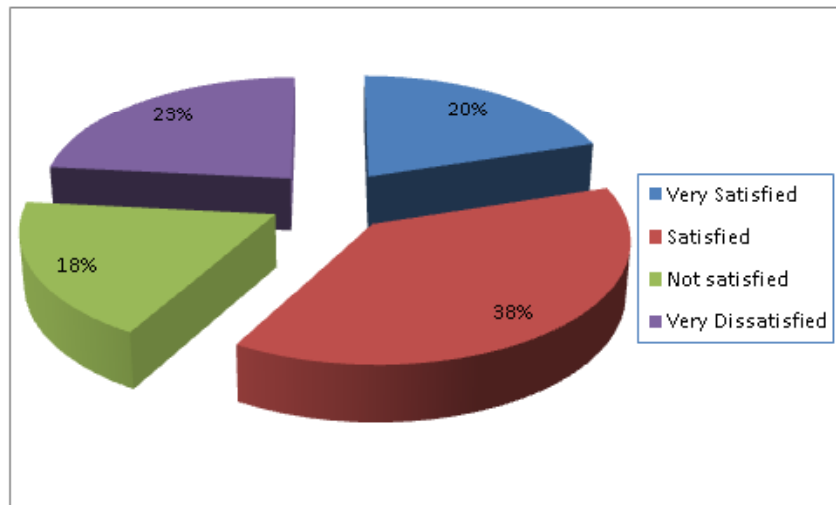
Lowest scoring question from applicants was in relation to use of peoples time – 63%

Some mixed comments received including:

- We have been very happy with the planners handling of this project. Very responsive and clear communication.
- It would help if some communication occurred prior to the decision. Certainly, I would have been happy to amend our plans if we had some guidance on what was more acceptable than our original plans. Perhaps it would have saved council another application
- We have been very happy with the planners handling of this project. Very responsive and clear communication.
- The pre planning meeting was actually incredibly helpful to stop me trying to apply for something that would be turned down and inform me about prior approval which i hadn't heard of before

Customer satisfactions surveys for April – March 2016 showed that neighbours are overall 58% satisfied with the Planning Service

3227 surveys were sent to neighbours who had commented on a planning application, which had been decided between the 1st of April 2015 and the 31st of March 2016 : 387 surveys were completed (12%)
4 questions were asked in regards to helpfulness, use of time, use of information and clarity of decision



Overall satisfaction rating of 58% from neighbours

Highest scoring question from neighbours was in relation to use of information – 66%

Lowest scoring question from neighbours was in relation to use of peoples time – 48%

Some mixed comments received including:

- I have been impressed by my dealings with Haringey Council planning department, as a member of the planning committee of the Highgate Society. This application was a very simple and straightforward one.
- I would love it if Haringey Planning offered a service where local people could register an interest and receive automatic emails alerting them to new and progressing planning cases.
- It was very disheartening to only learn of this application from a notice on a lamp-post, which itself wasn't particularly visible due to the elements and slipping below eyelevel.
- Make it much easier for a layman to understand the council and planning process. I would very much like to be further involved, but I feel the process is not transparent enough for us to contribute.

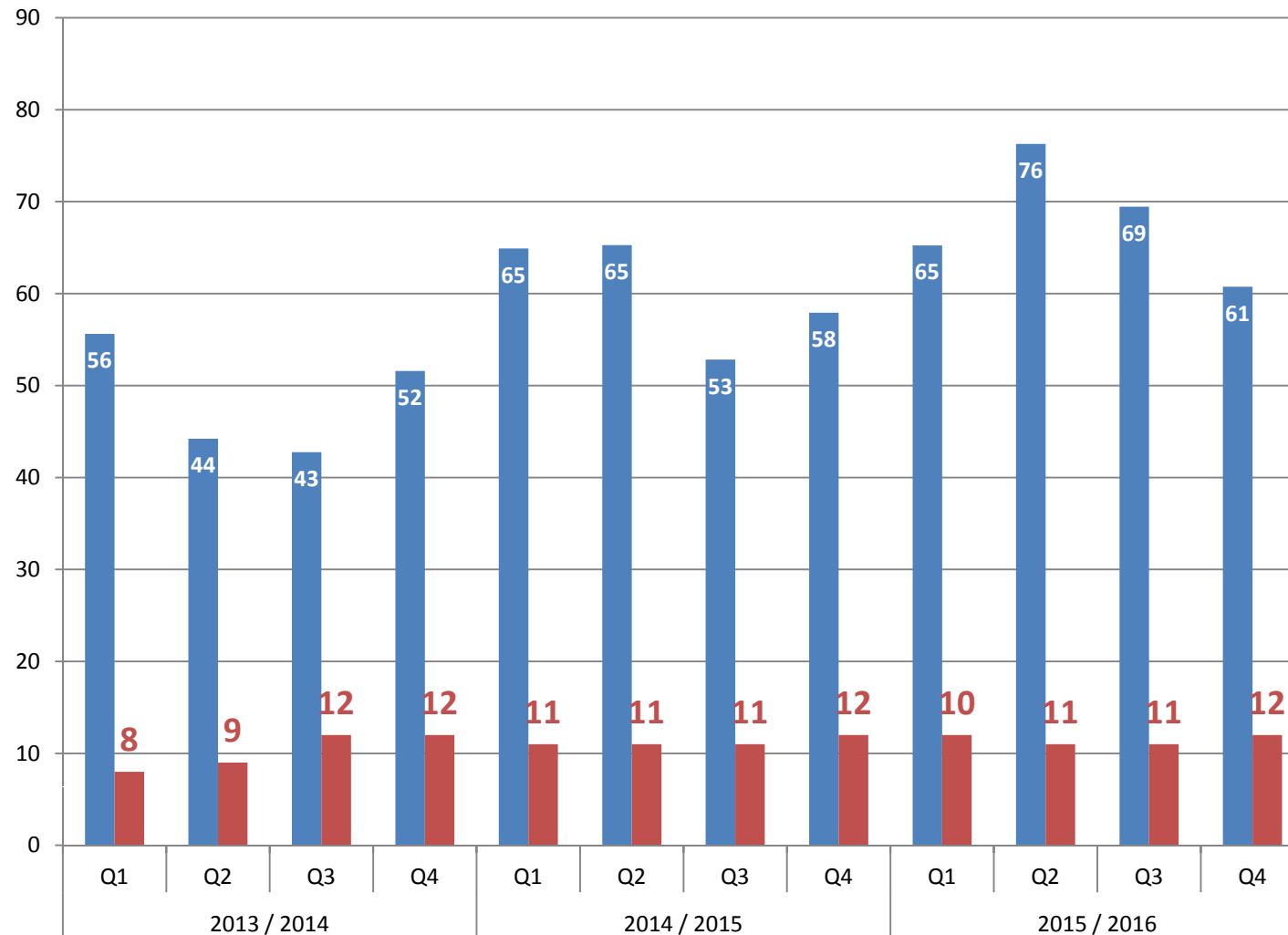
Corporate Delivery Unit

Workforce / Caseloads

- Caseload (average number of applications on hand per officer by quarter)

Planning application caseloads on hand per officer by quarter

Target: **Not set** Current performance: **average of 61 cases for each of the 12 member of staff**



This is a crude measure of caseloads, calculated as follow:
 On hand (PSOs, Majors, Minors, Others) / FTE Case officers, this does not include the pre-application caseload, enquiries and appeals

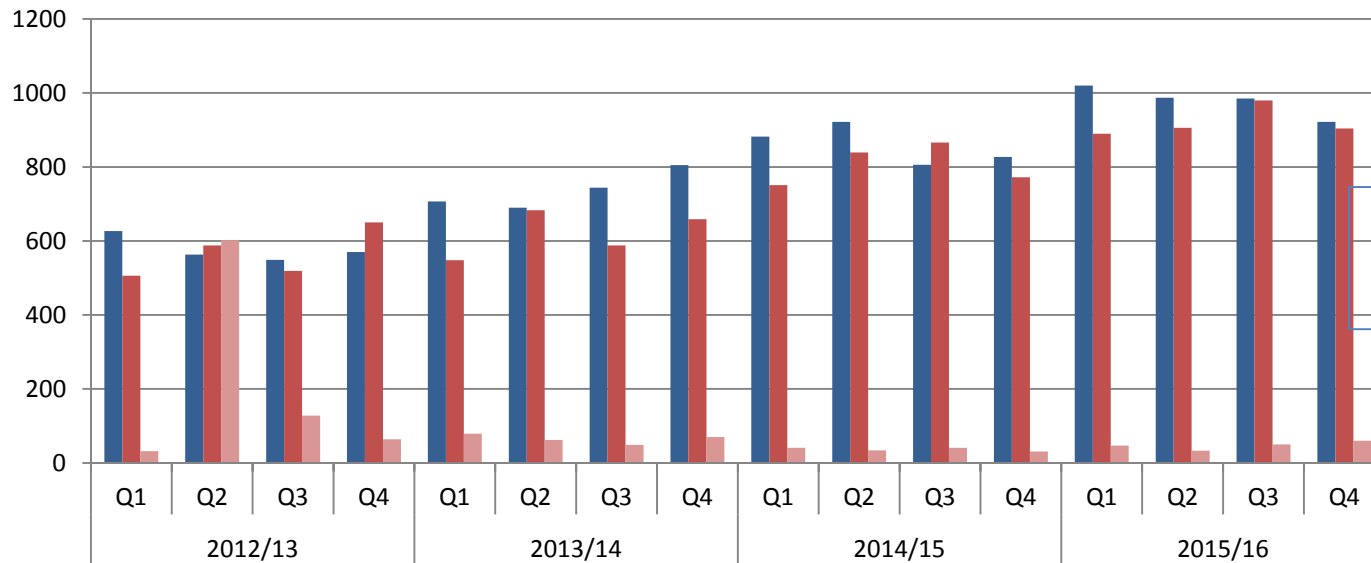
Caseloads are still high, but are reducing

Corporate Delivery Unit

Applications received, determined and withdrawn per quarter, Including applications on hand at the end of each quarter



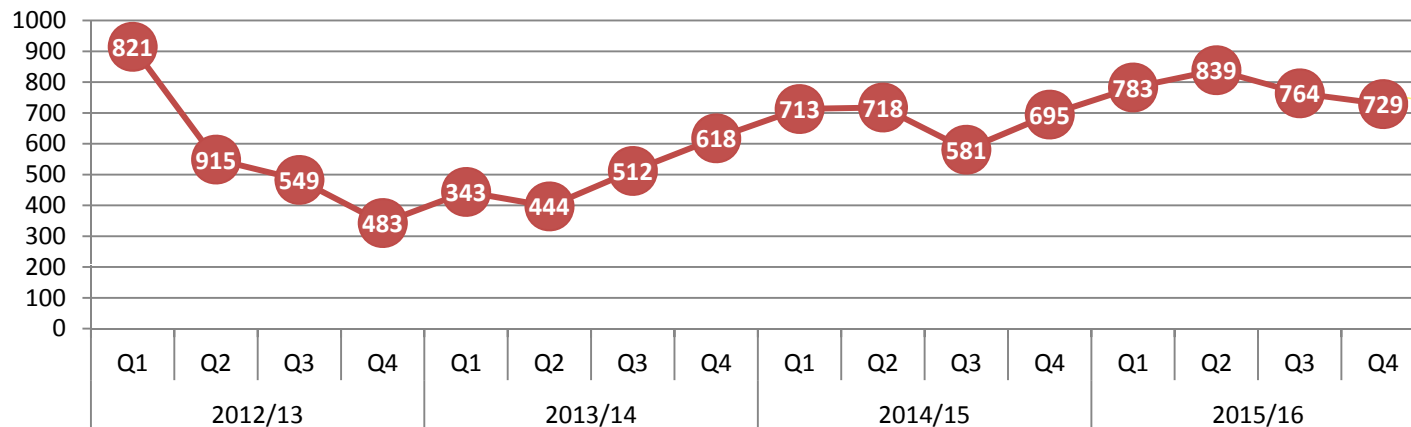
Applications received, determined and withdrawn per quarter



'Withdrawn' includes applications dealt with under the finally disposed of procedure

Numbers on hand include majors, minors, others and PSO's only. Q3 of 2014/15 saw more applications determined than received so that the number of cases on hand had started to fall but it has risen again in quarter 4 and again in quarter 1

Applications on hand at end of quarter



A healthy ratio would be the number on hand at the end of the quarter being about half of the applications received.

DM Board (Speed, Quality & Cost stats)

Planning service - towards 'Top quartile in London/England'

April 2016



Summary dashboard



Performance on majors measured over the two years rolling is now in the top quartile.

Performance on minors and others is still variable but has improved since the dip in the summer and is now in the top quartile in London.

Performance on discharge of conditions is improving although further improvement is needed. Further work with internal consultees is planned.

One major application has been overturned at appeal and one had a split decision in the last two years.

Performance on validation has significantly improved. A spreadsheet to allow automatic allocation has been developed and implemented which has led to substantial improvements in performance in validation.

Although enforcement requires further work to reach target. Substantial improvements have been made in all areas.

This is Amber because of enforcement.

Preliminary results from the Resources Review suggest that DM is at 75% cost recovery

Workforce / Caseloads Amber /Green

The number of applications is still high but has stabilised. Some inroads have been made into the backlog.

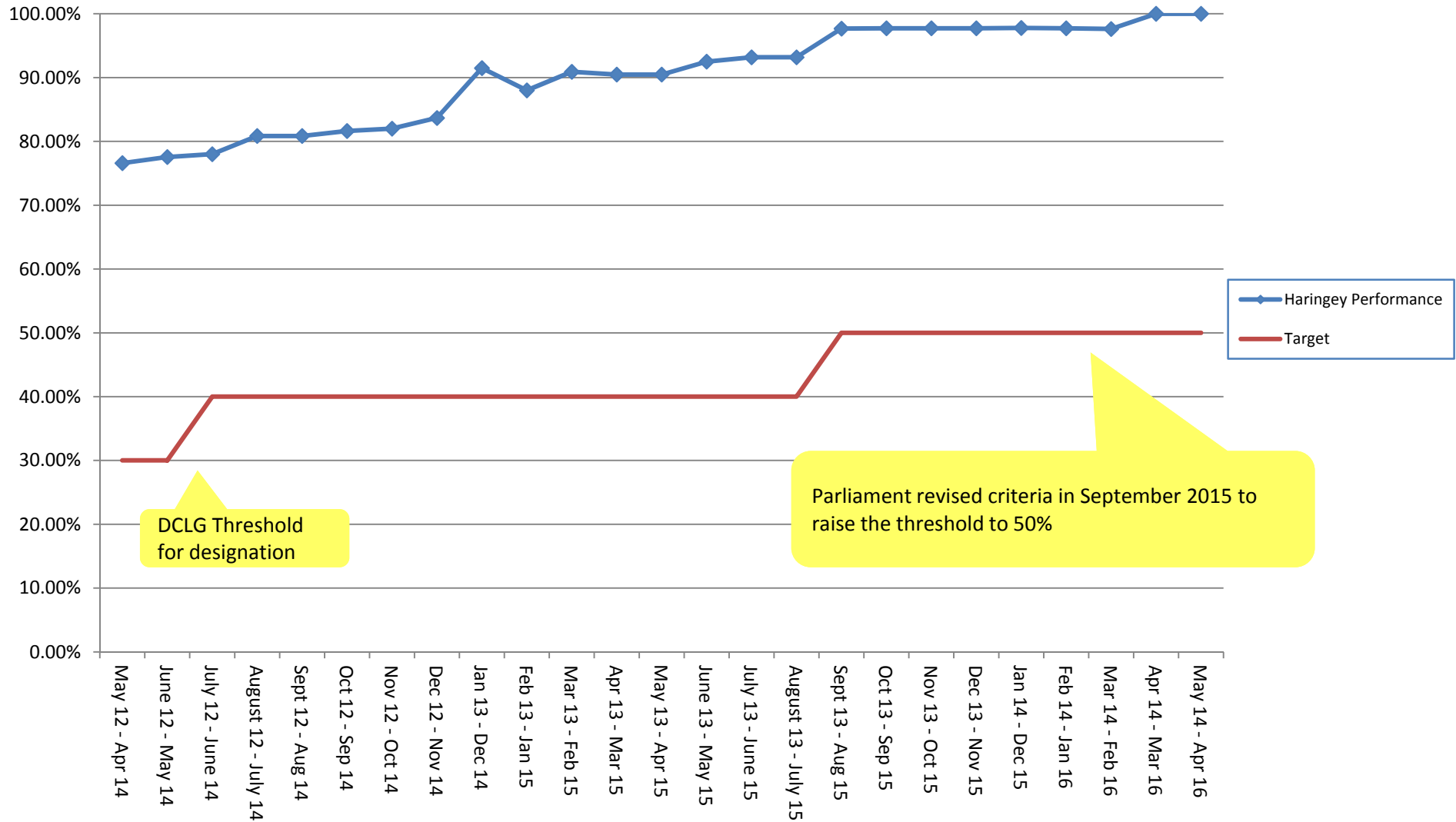
Speed Indicators

-
- Major planning applications decided within 13 weeks over a 2 year period
 - Percentage of Major applications determined within 13 weeks
 - Percentage of minor applications determined within 8 weeks
 - Percentage of others applications determined within 8 weeks
 - Percentage of Approval of details (Discharge of conditions) determined within time
 - Average number of days to make a decision

Speed of decisions – DCLG Measurement: Major applications decided within 13 weeks over a 2 year period



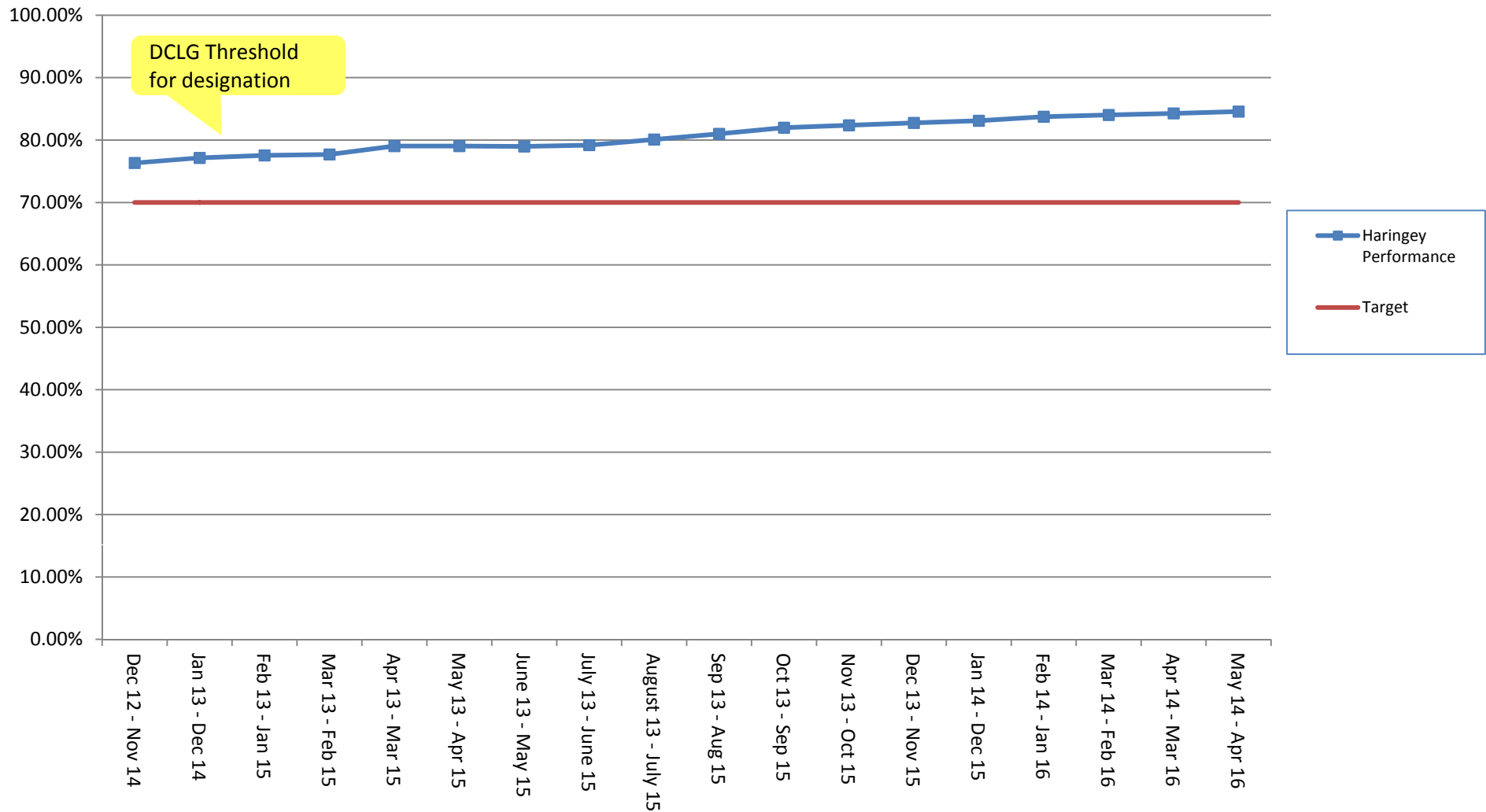
Threshold: 50% Current performance: 100%



Speed of decisions – DCLG Measurement: Minor / Other applications decided within 13 weeks over a 2 year period



Threshold: 70% Current performance: 85%



Performance on 'Major' applications determined within 13 weeks, or within an agreed extension of time or Planning Performance Agreement

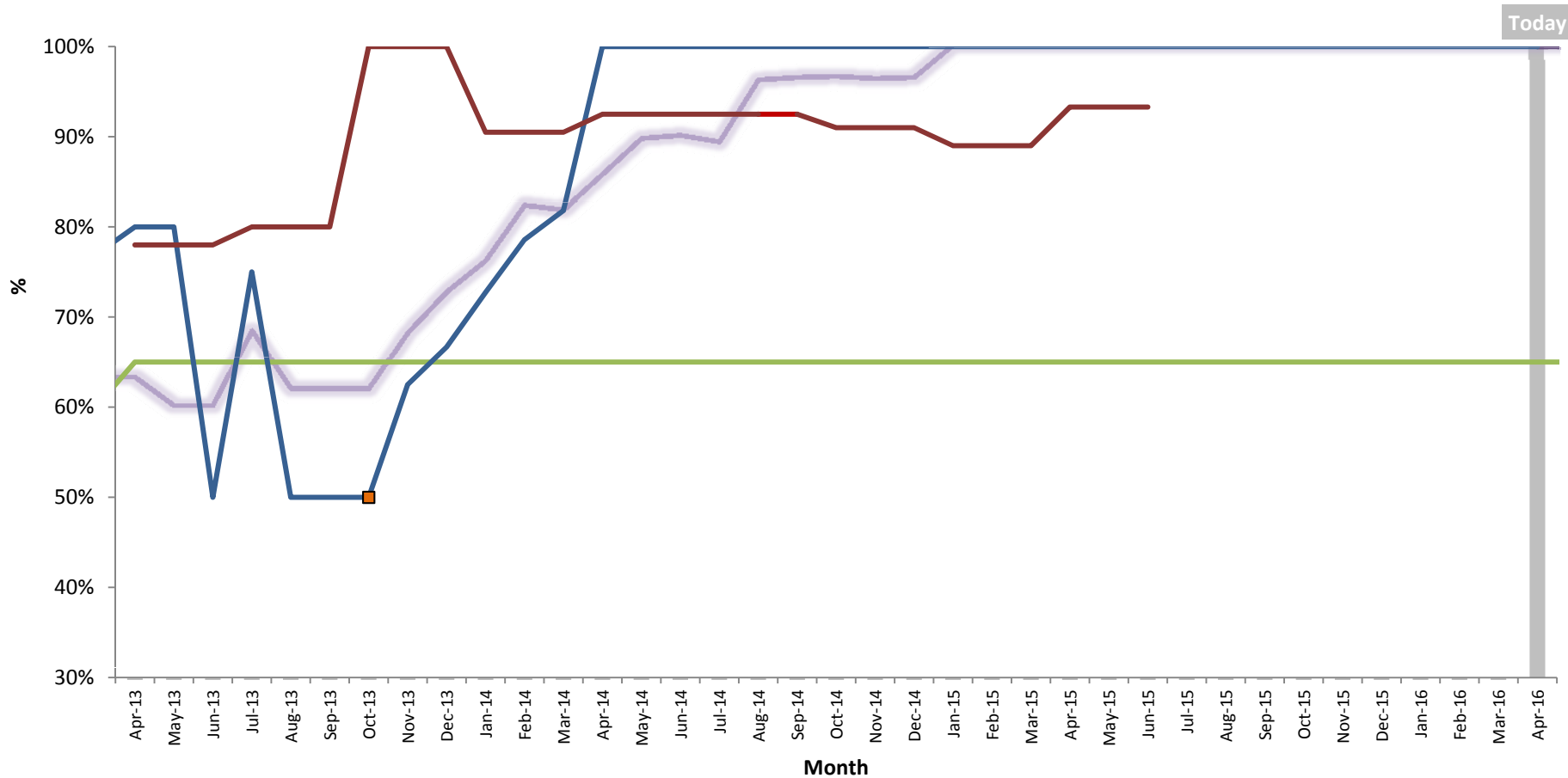


Percentage of Major applications determined within 13 weeks

Target: 65% Current performance: 100% (cumulative for current financial year)

Percentage of planning applications processed in 13 weeks (Major)
Year to date

Good performance is high



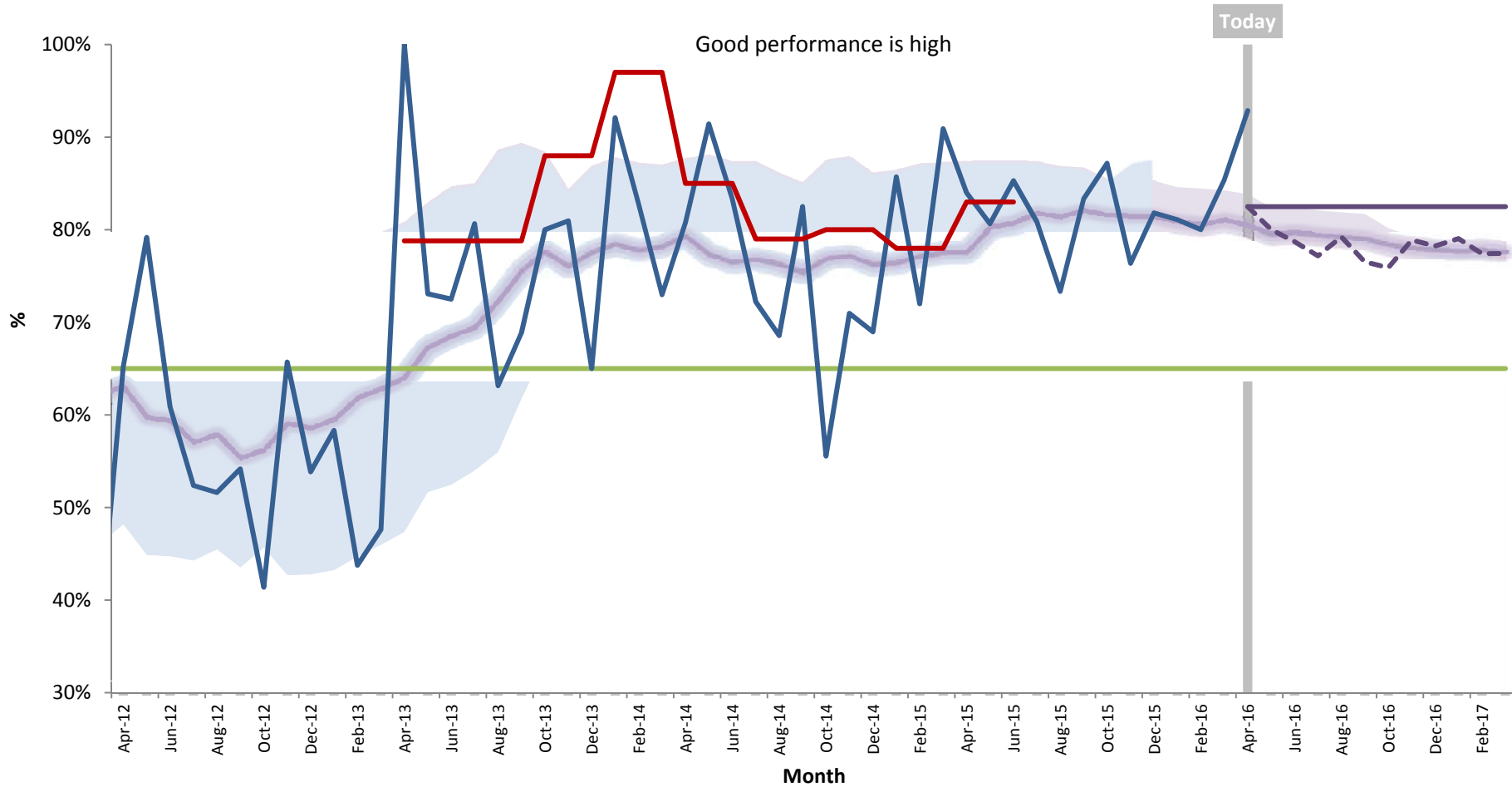
Performance on 'Minor' applications determined within 8 weeks, or within an agreed extension of time



Percentage of Minor applications determined within 8 weeks
 Target: 65% Current performance: 93% (cumulative for current financial year)

* Applications subject to a PPA or an agreed extension of time are included in these figures.

Percentage of planning applications processed in 8 weeks (Minor)



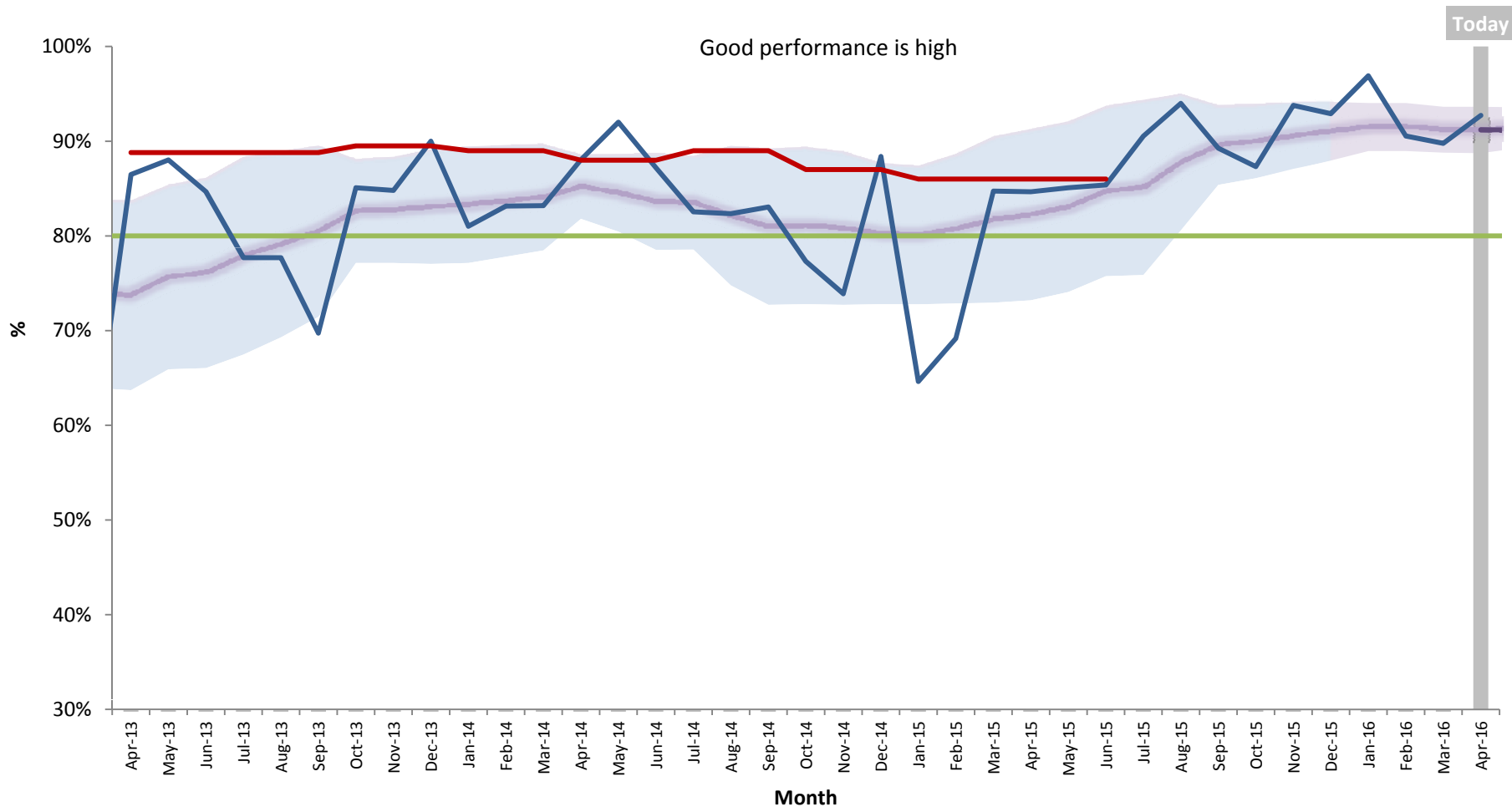
Performance on 'other' applications determined within 8 weeks, or within an agreed extension of time



Percentage of others applications determined within 8 weeks
 Target: 80% Current performance: 93% (cumulative for current financial year)

* Applications subject to a PPA or an agreed extension of time are included in these figures.

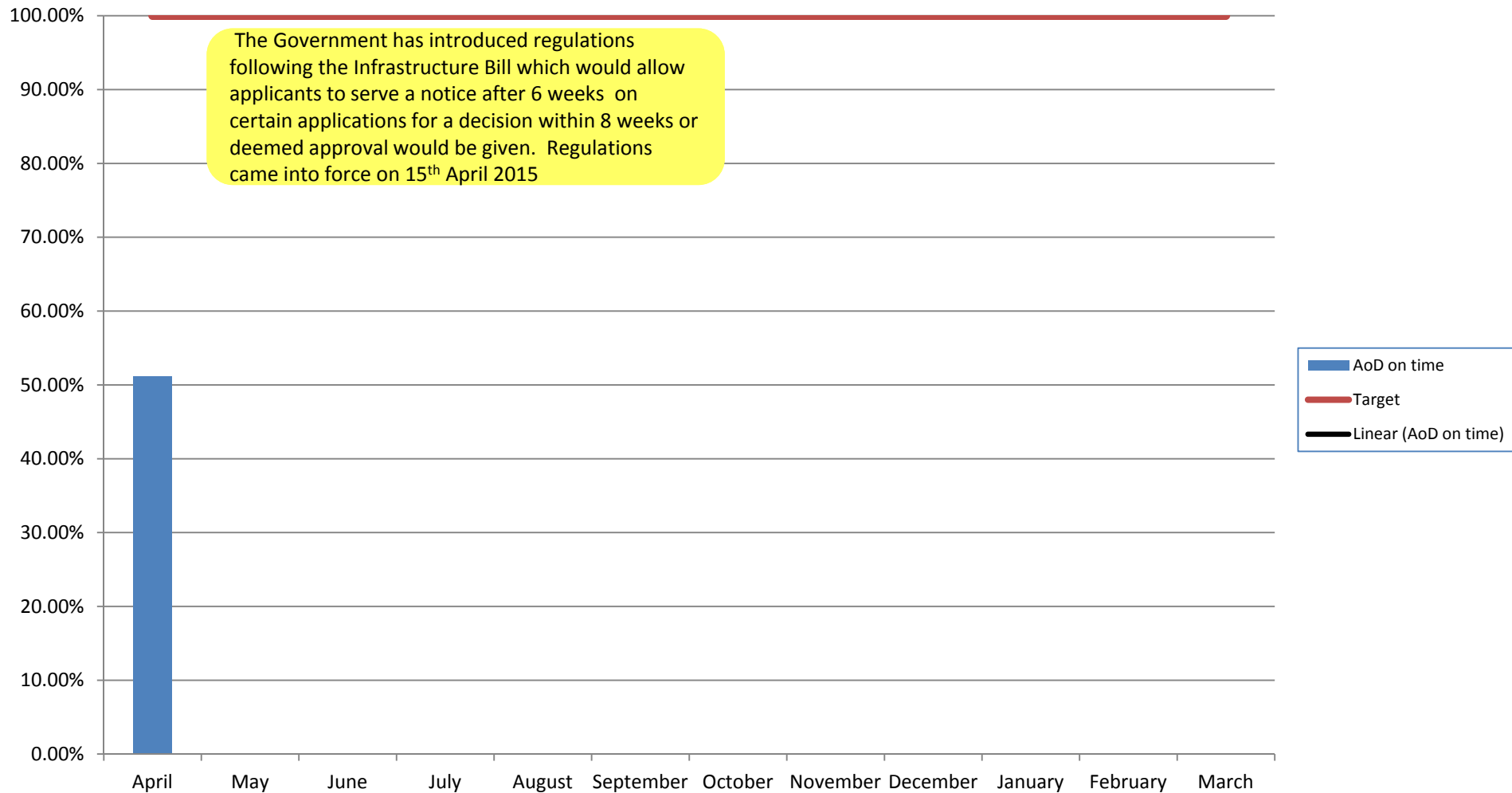
Percentage of planning applications processed in 8 weeks (Other)



Percentage of Approval of Details planning applications determined within time

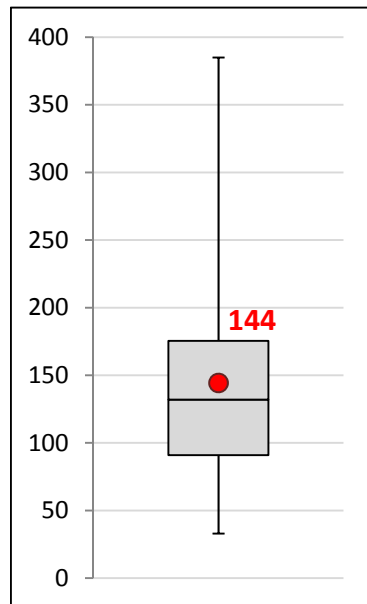


Target: 100% Current performance: 51% (cumulative for current financial year)



**Major Planning Applications:
Days taken from receipt of a valid application to date of decision issued**

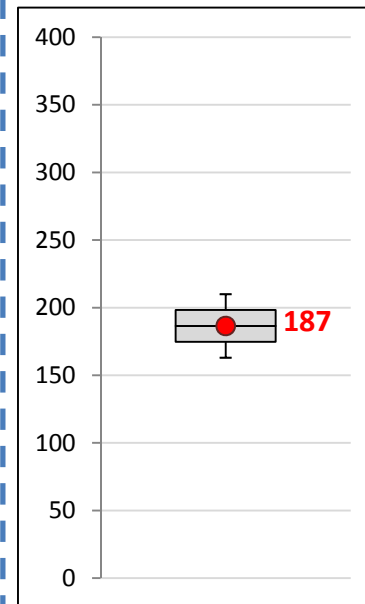
Majors performance Apr-Mar 2015-2016
- 19 Majors decided -



- Average days: 144
- Most days taken: 385
- Least days taken: 33
- Most frequent day number: 132
- Most decisions between 91 and 176 days

12 of the 19 decisions (63%) were decided within a PPA / extension of time agreement

Majors performance April 2016
- 2 Majors decided -

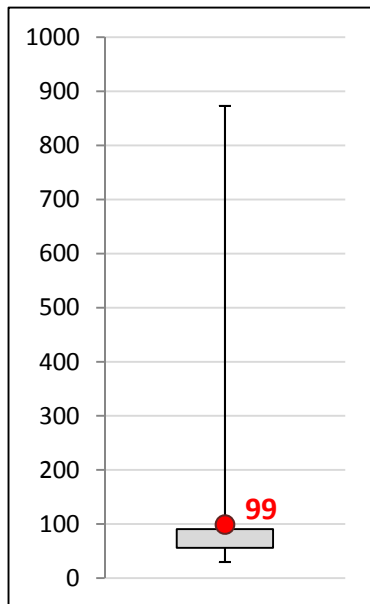


- Average days: 187
- Most days taken: 210
- Least days taken: 163
- Most frequent day number: 186
- Most decisions between 175 and 198 days

2 of the 2 decisions (100%) were decided within a PPA / extension of time agreement

**Minor Planning Applications:
Days taken from receipt of a valid application to date of decision issued**

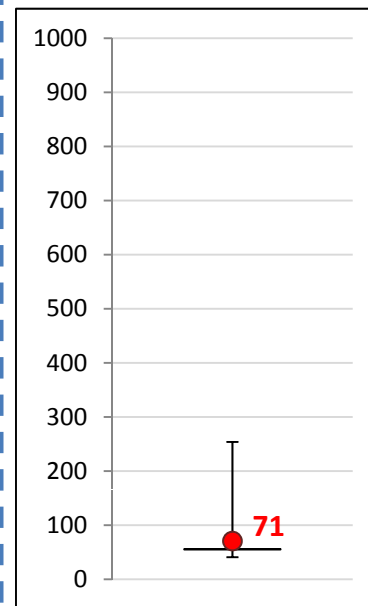
Minors performance Apr-Mar 2015-2016
- 438 Minors decided -



- Average days: 99
- Most days taken: 873
- Least days taken: 30
- Most frequent day number: 56
- Most decisions between 56 and 91 days

85 of the 438 decisions (19%) were decided within an extension of time

Minors performance April 2016
- 42 Minors decided -

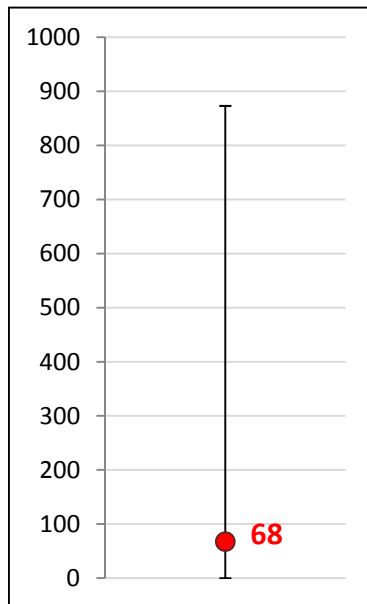


- Average days: 71
- Most days taken: 254
- Least days taken: 41
- Most frequent day number: 56
- Most decisions between 55 and 56 days

7 of the 42 decisions (17%) were decided within an extension of time

**Other Planning Applications:
Days taken from receipt of a valid application to date of decision issued**

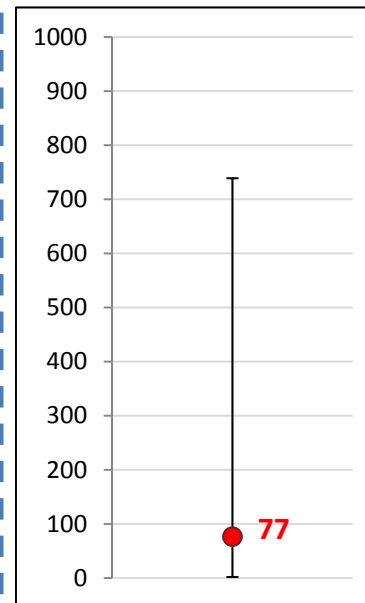
Others performance Apr-Mar 2015-2016
- 1707 Others decided -



- Average days: 68
- Most days taken: 873
- Least days taken: 0
- Most frequent day number: 56
- Most decisions made on 56 days

209 of the 1707 decisions (12%) were decided within an extension of time

Others performance April 2016
- 110 Others decided -

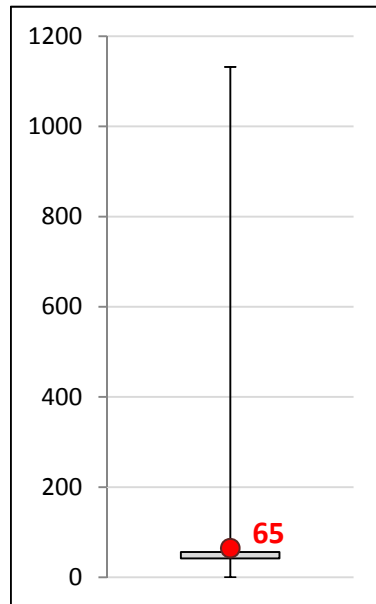


- Average days: 77
- Most days taken: 739
- Least days taken: 2
- Most frequent day number: 56
- Most decisions made on 56 days

15 of the 110 decisions (14%) were decided within an extension of time

**PSO Planning Applications:
Days taken from receipt of a valid application to date of decision issued**

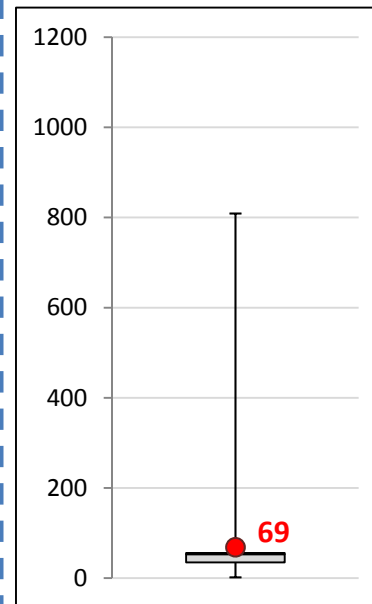
PSO performance Apr-Mar 2015-2016
- 1515 PSOs decided -



- Average days: 65
- Most days taken: 1132
- Least days taken: 0
- Most frequent day number: 56
- Most decisions between 42 and 56 days

41 of the 1515 decisions (3%) were decided within an extension of time

PSO performance April 2016
- 149 PSOs decided -



- Average days: 69
- Most days taken: 809
- Least days taken: 2
- Most frequent day number: 53
- Most decisions between 35 and 56 days

4 of the 149 decisions (3%) were decided within an extension of time

*PSO (includes discharges of conditions, trees, prior approval, non-material amendments , COLs, etc)

A grey arrow-shaped graphic pointing to the right, containing the word "Quality" in white text.

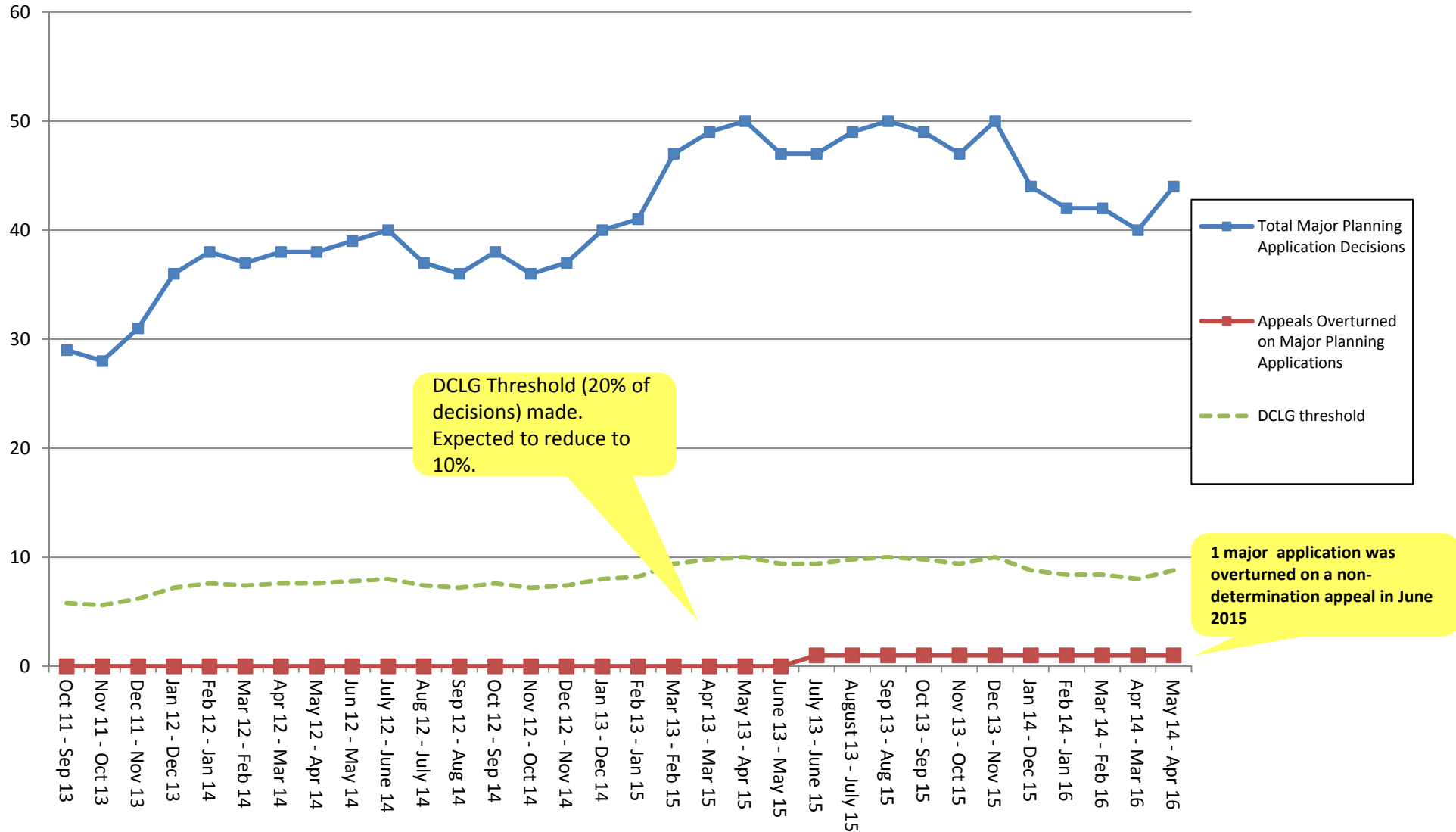
Quality

- The extent to which major applications are overturned at appeal over a two year period
- Days to make valid
- Days from declared Valid to Decision issued
- Percentage of Planning Enforcement Complaints on which a decision is taken within 8 weeks
- Percentage of complainants notified about the progress of the enforcement complaint decision within 8 weeks
- Number/percentage of Acknowledged enforcement complaints with in 24hrs
- Customer satisfaction

Quality of decisions – DCLG Measurement: Major applications overturned at appeal over a 2 year period



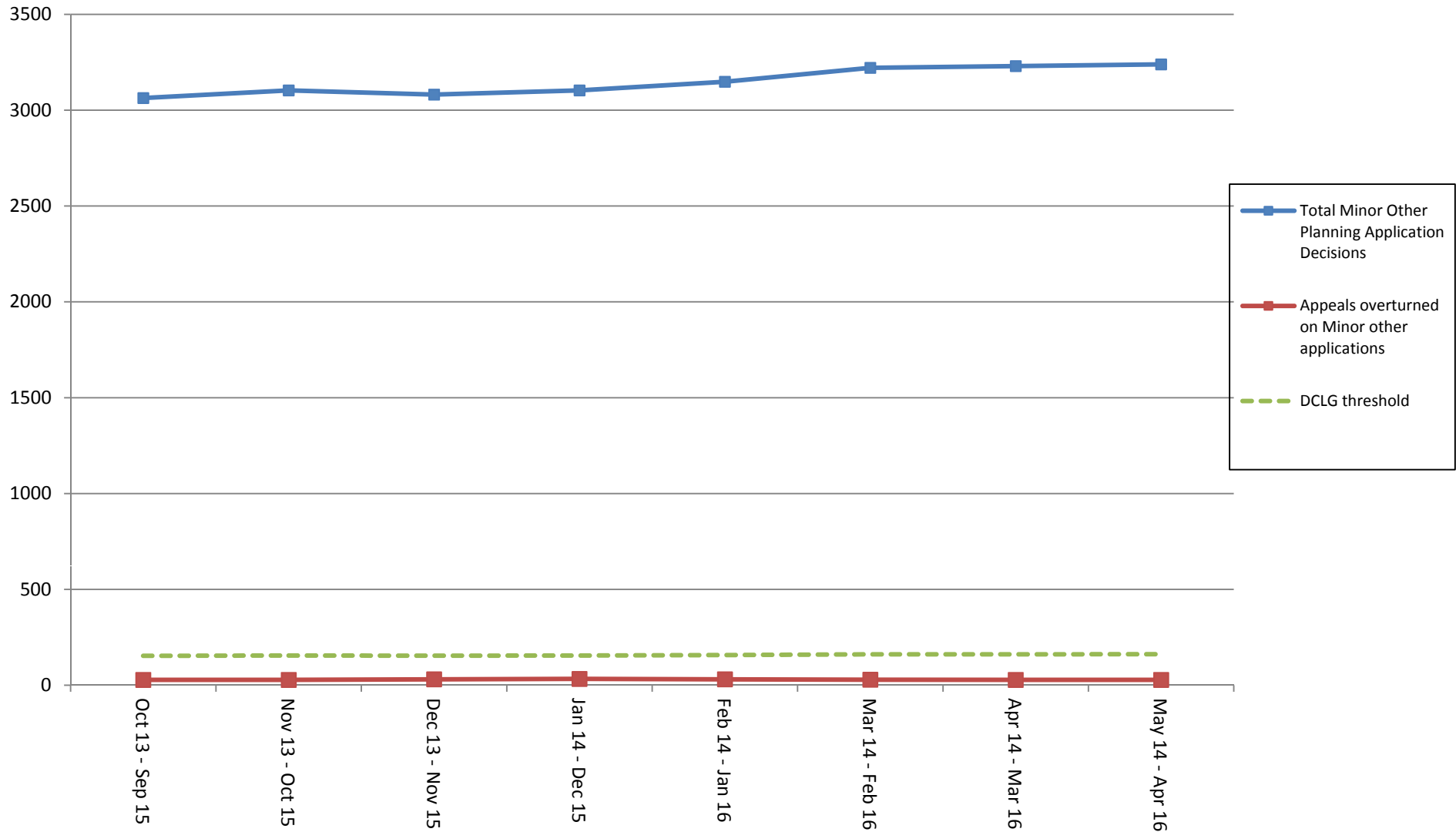
Threshold: 20% Current performance: 2%



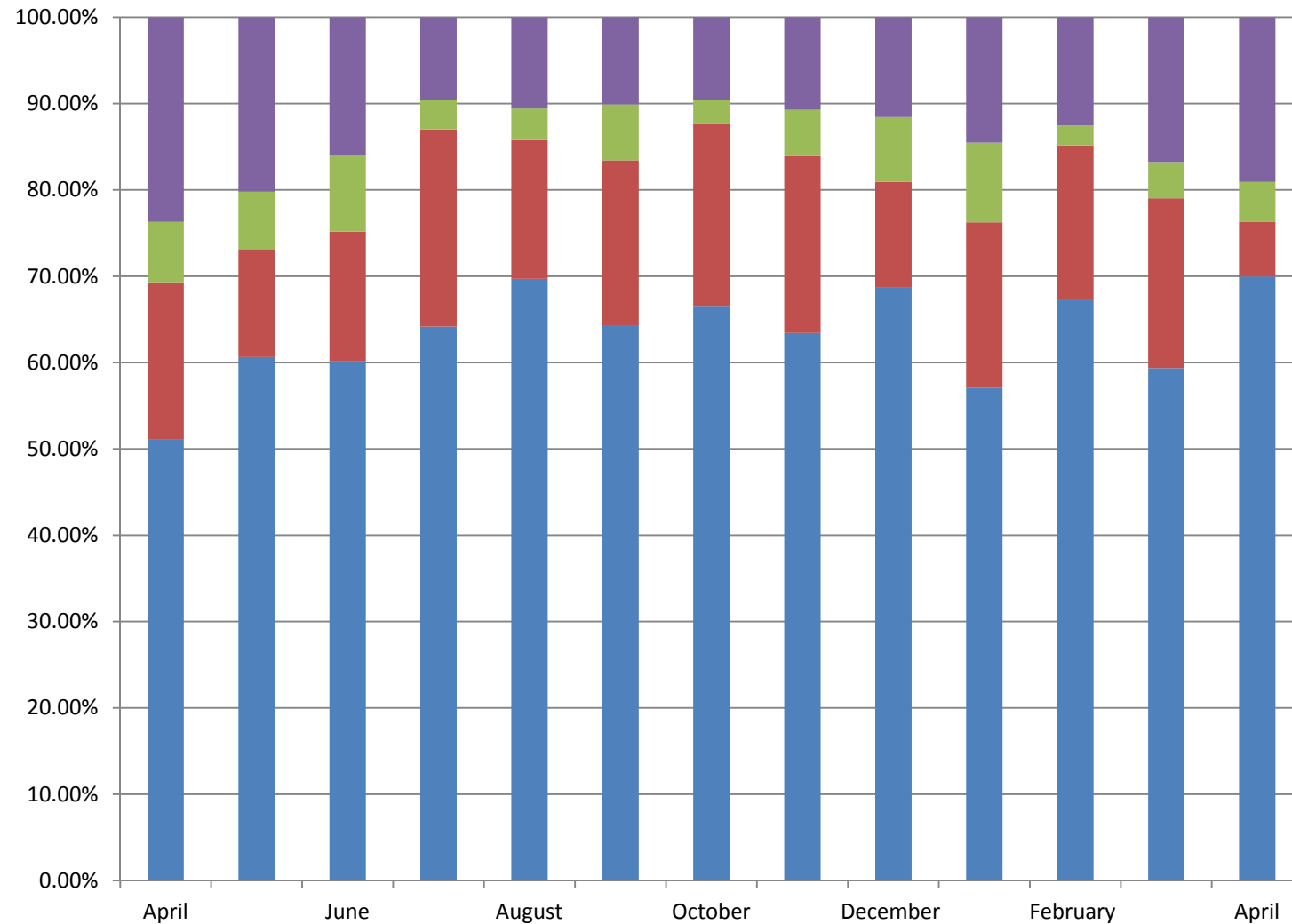
Quality of decisions – DCLG Measurement: Minor / Other applications overturned at appeal over a 2 year period



Threshold: 5% of all minor other decisions



Percentage of planning applications which are valid on receipt

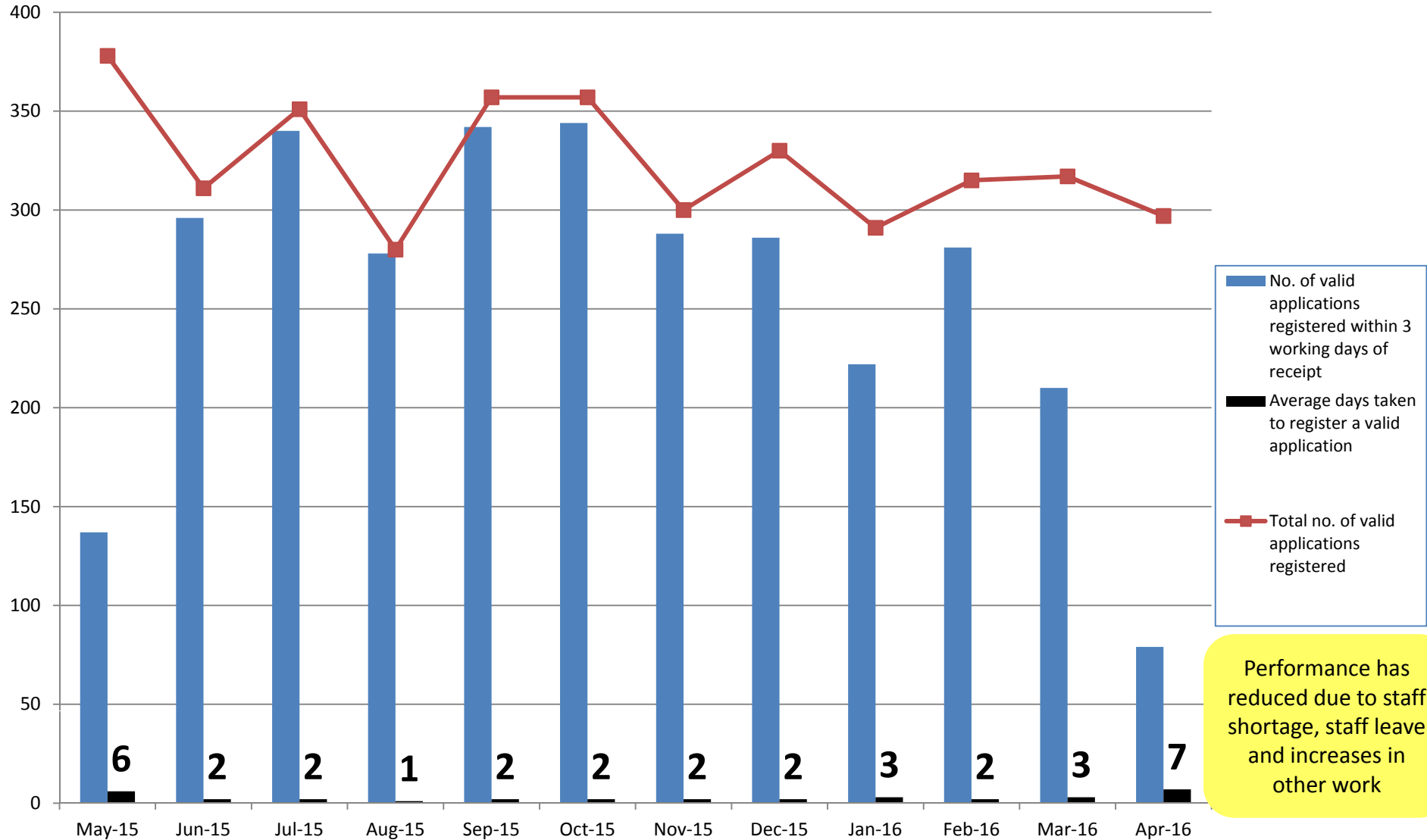


Top 3 reasons for invalidity:

1. Awaiting cheque payment (60%)
2. Dimensions and / or scale bar missing (30%)
3. Incorrect application form (10%)

■ % valid after 5 working days
■ % valid within 4-5 working days
■ % valid within 1-3 working days
■ % valid on receipt

Average time taken to register a valid planning application

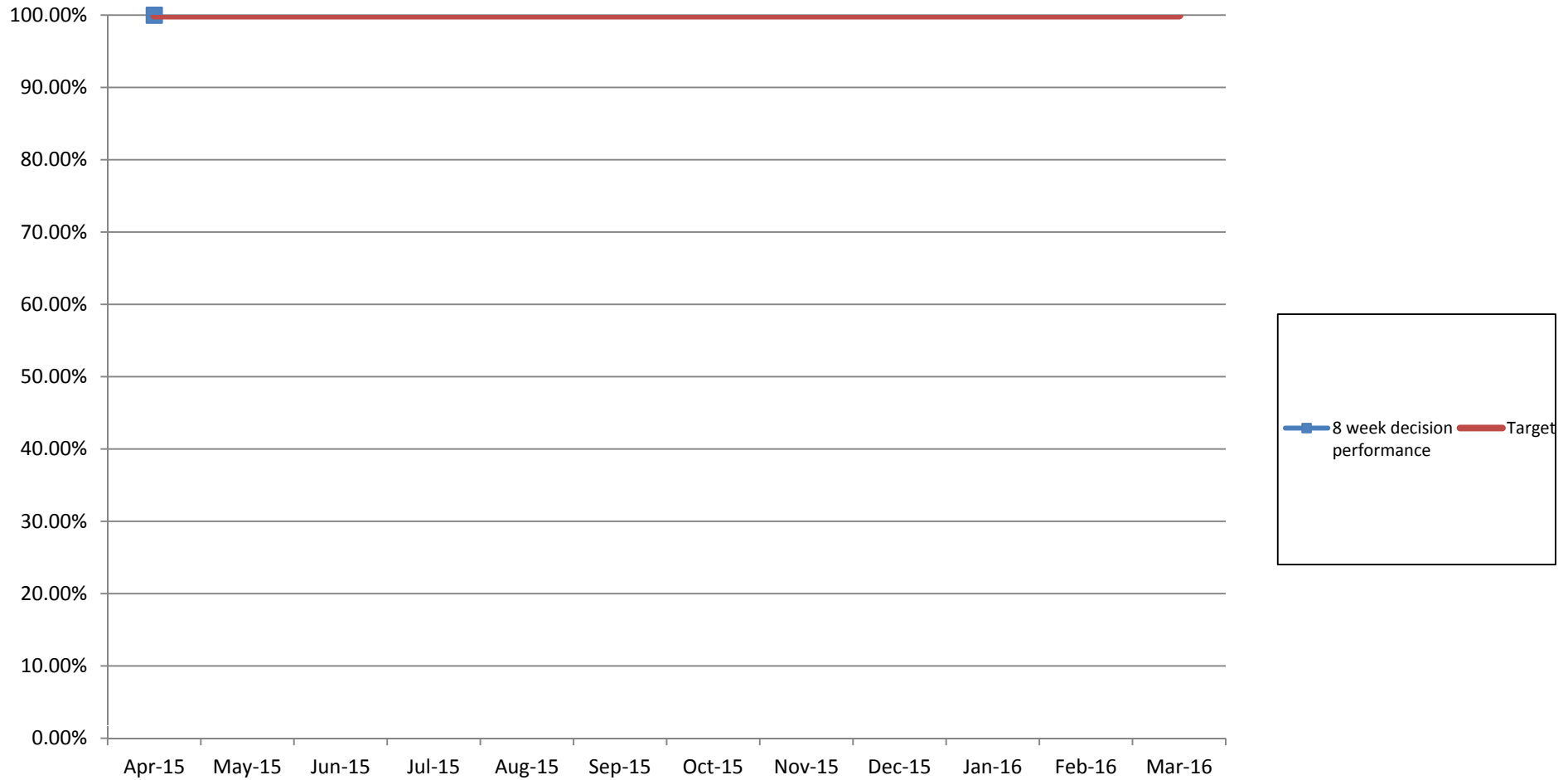


Performance has reduced due to staff shortage, staff leave and increases in other work

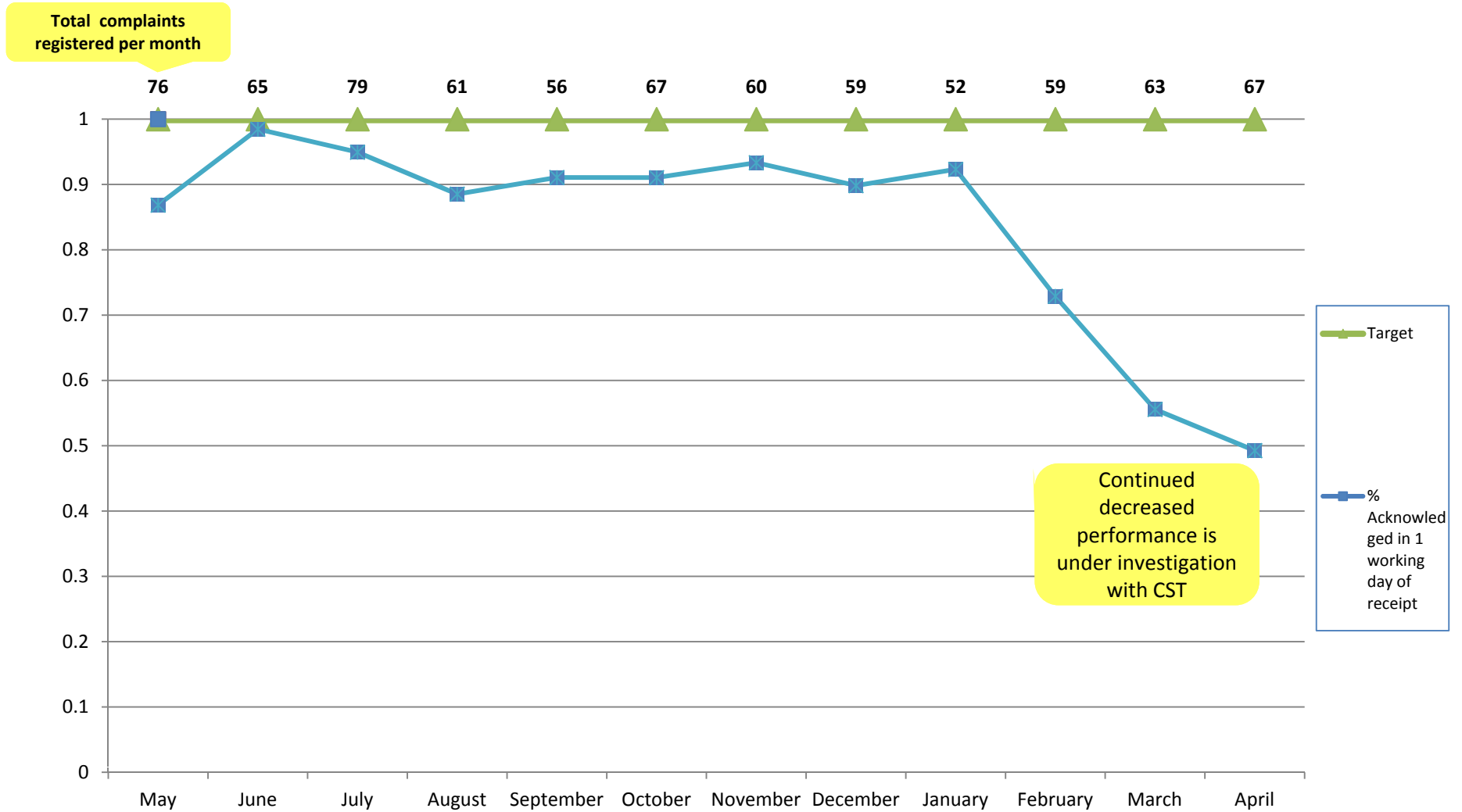
Percentage of Planning Enforcement Complaints on which a decision is taken within 8 weeks



Target: 90% Current performance: 100% (cumulative)



Number of Planning Enforcement Complaints acknowledged within 1 working day

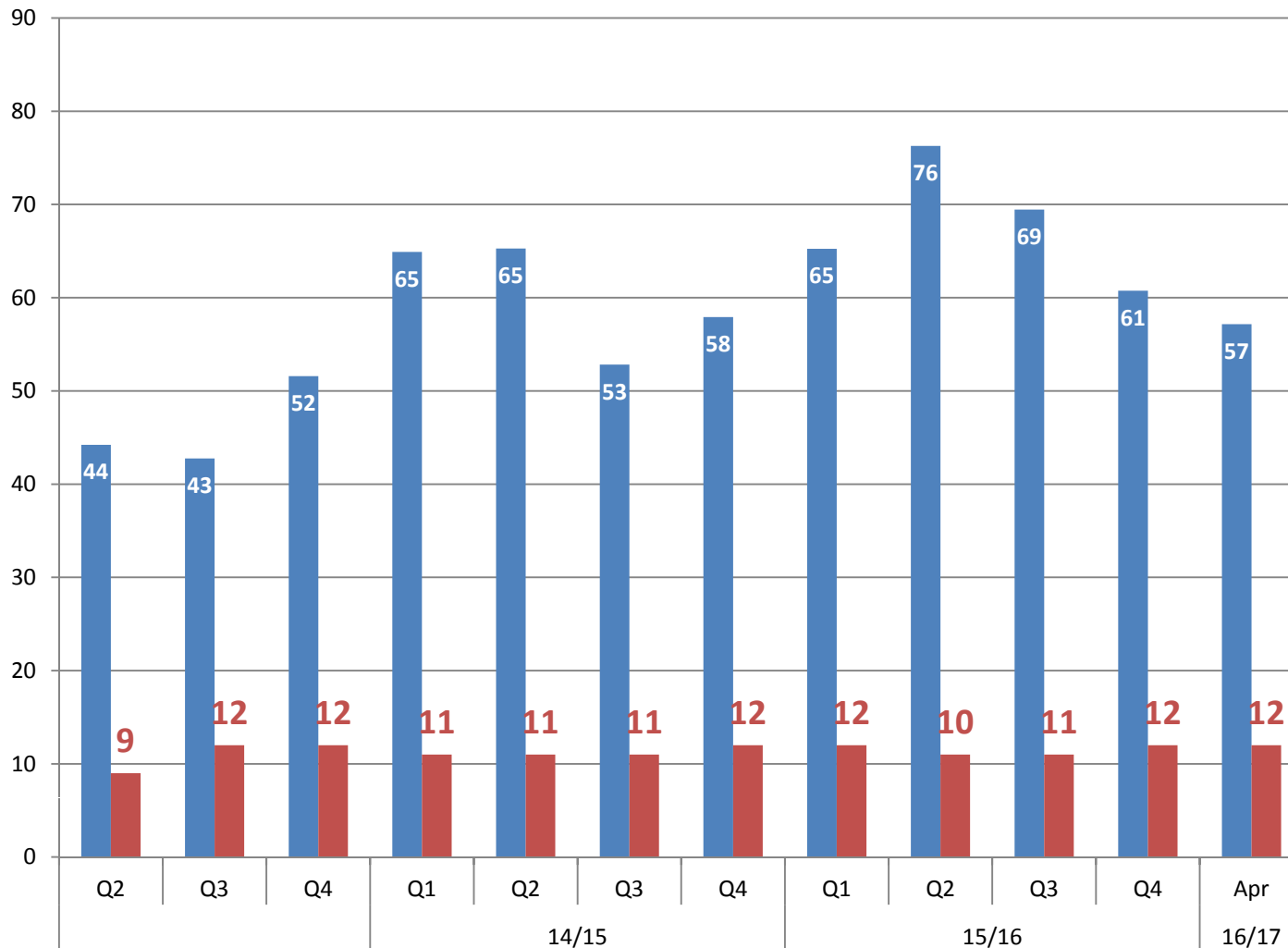


Workforce / Caseloads

- Caseload (average number of applications on hand per officer by quarter)

Planning application caseloads on hand per officer by quarter

Target: **Not set** Current performance: **average of 57 cases for each of the 12 member of staff**



This is a crude measure of caseloads, calculated as follow:
 On hand (PSOs, Majors, Minors, Others) / FTE Case officers, this does not include the pre-application caseload, enquiries and appeals

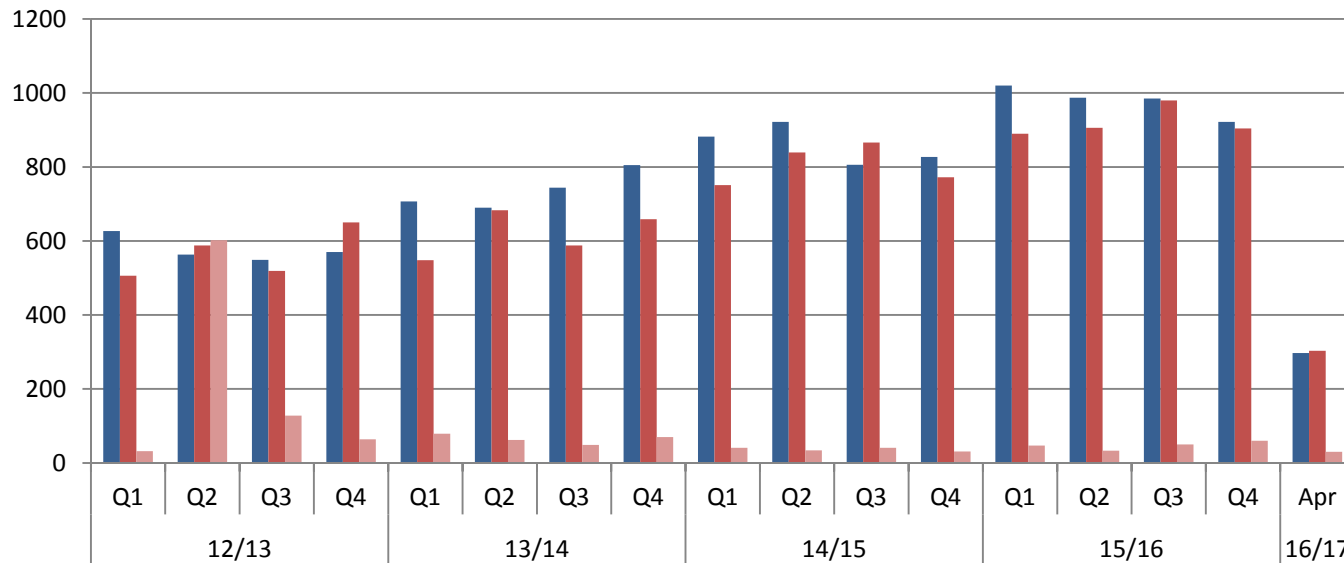
Caseloads are still high but are reducing.

Corporate Delivery Unit

Applications received, determined and withdrawn per quarter, Including applications on hand at the end of each quarter



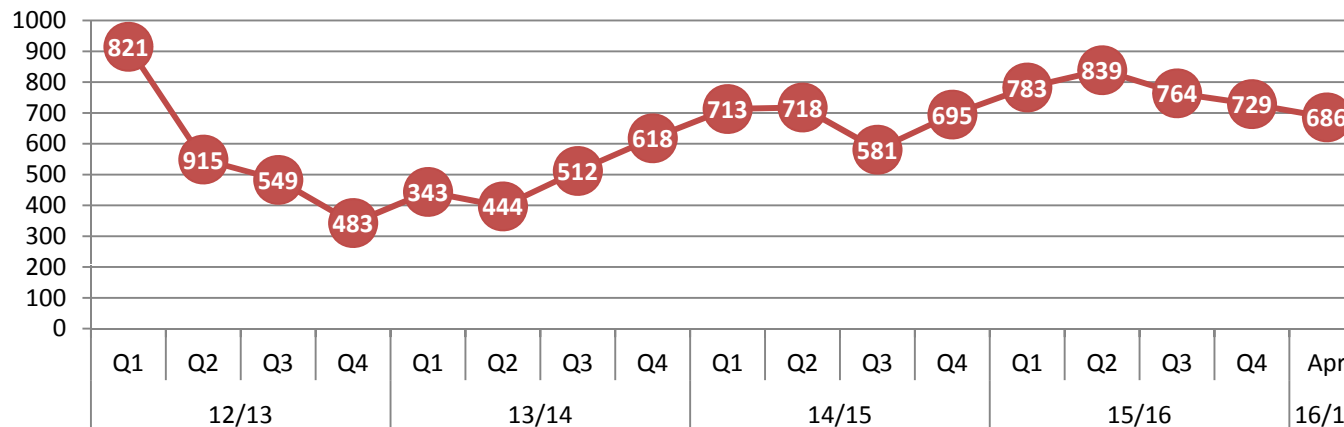
Applications received, determined and withdrawn per quarter



'Withdrawn' includes applications dealt with under the finally disposed of procedure

Numbers on hand include majors, minors, others and PSO's only. Q3 of 2014/15 saw more applications determined than received so that the number of cases on hand had started to fall but it has risen again in quarter 4 and again in quarter 1

Applications on hand at end of quarter

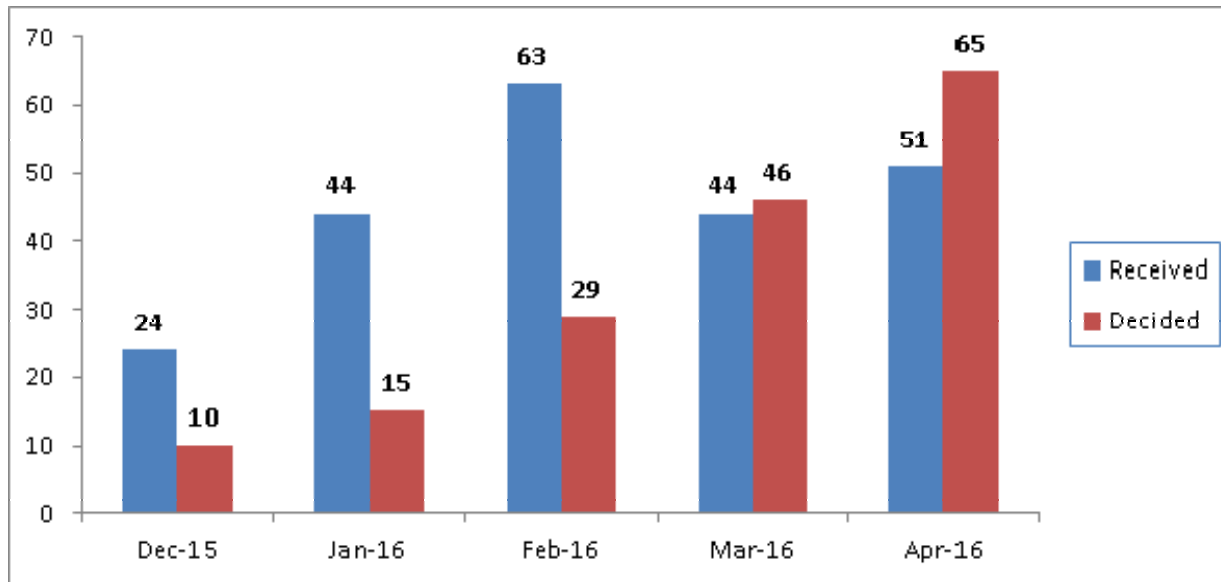


A healthy ratio would be the number on hand at the end of the quarter being about half of the applications received.

**Planning Solutions Team:
Length of time taken from date deemed valid to date decision made**



The Planning Solutions Team are making decisions on applications significantly quicker than planning officers in the rest of the service



In the past 5 months, PST received 213 applications, of which 165 have been decided.

In April the average length of time taken from date received to the date the decision was sent was 41.

New applications from 6 wards are now being processed by the PST.

	Received	Decided	Average days to decision	Least days	Most days
Dec-15	24	10	6	0	9
Jan-16	44	15	29	8	37
Feb-16	63	29	33	10	63
Mar-16	44	46	42	13	65
Apr-16	51	65	41	2	84
Total	213	165	36	0	84

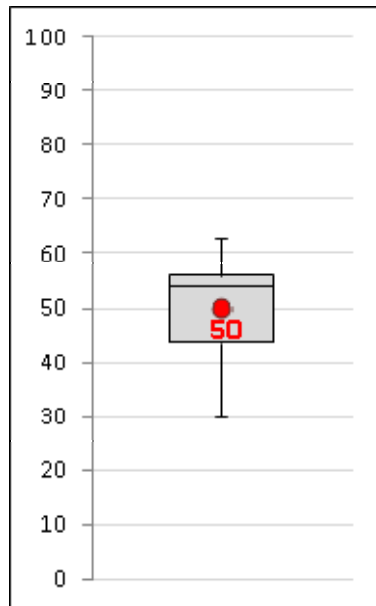
Wards incorporated: Wood Side / Noel Park / St Ann's / Haringay / Bounds Green / West Green

**Planning Solutions Team:
Range of days taken to send the applicant a decision**



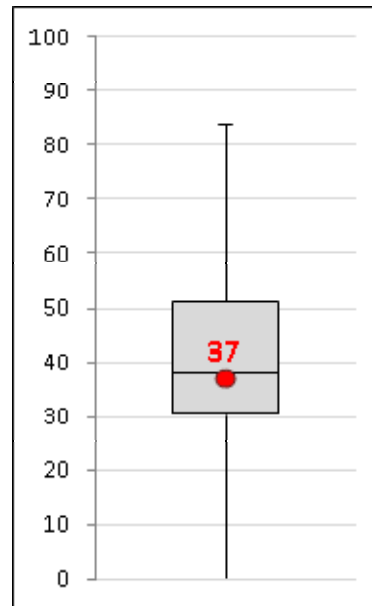
The range of days taken by the PST to send the application a decision is considerably smaller than planning officers in the rest of the service

Minors



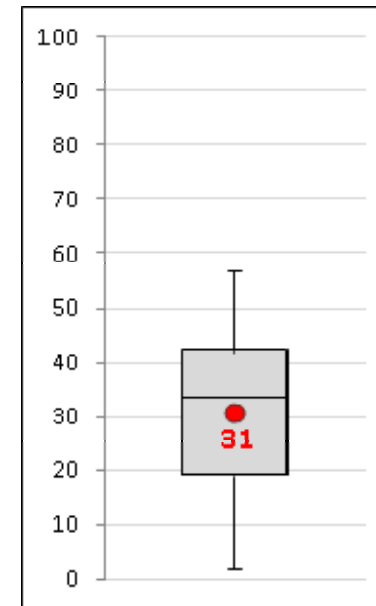
**From December to April PST took an average of 50 days to send a decision on the 28 decisions made.
This compared to 93 days on 160 decisions for officers in the rest of the service in the same period**

Others



**From December to April PST took an average of 37 days to send a decision on the 63 decisions made.
This compared to 70 days on 595 decisions for officers in the rest of the service in the same period**

PSO



**From December to April PST took an average of 31 days to send a decision on the 74 decisions made.
This compared to 70 days on 582 decisions for officers in the rest of the service in the same period**

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Scheme of Delegation - Planning Sub-Committee (Part Three Section B of the Constitution agreed by Council on xx)

All matters are delegated by the Planning Sub-Committee except the following:

(A) *planning applications for the erection of 10 or more dwellings and where the officer recommendation is for approval;*

(B) *planning applications for changes of use 1000 sq. metres of gross internal floor space and where the officer recommendation is for approval;*

(C) *planning applications for the erection, or extension of non-residential buildings where the new build is more than 1000 sq metres gross internal floor space and where the officer recommendation is for approval*

(D) *unless otherwise agreed with the chair of the Planning Sub- Committee, planning applications either:*

(i) for major development as categorised by the Department for Communities in Local Government (DCLG) and where the officer recommendation is for approval; or

(ii) where a S106 is required; or

(iii) where the decision would be contrary to a policy in the development plan;

(E) *unless otherwise agreed with the Chair of the Planning Sub- Committee, Applications submitted by, or on behalf of the Council, planning applications submitted by or on behalf of the Council except for applications for development within the curtilage of a dwelling house or if agreed with the chair of the Planning sub-committee other applications which are of a minor nature;*

(F) *planning applications on Council owned land, where the Council is not the applicant, where significant material planning objections are received during the consultation process and which the Director, in consultation with the Chair of the Planning Sub-Committee, determines should be subject to Members' consideration;*

(G) *planning applications submitted by or on behalf of Members; or employees within the Planning Service or senior employees elsewhere in the Council; or their spouses, parents or children;*

(H) *any planning application to amend an application or vary conditions or a section 106 agreement previously decided/imposed by Planning Sub-Committee and which the Director, in consultation with the Chair of the Planning Sub- Committee, considers to constitute a major or significant change;*

(I) *any planning application where there have been objections from a single Ward Councillor and/or a local community body and/or a local residents' association, and a written request setting out the planning reasons for the matter to be referred to the Sub-Committee has been made before the expiry of the consultation period, and which the Director in consultation with the Chair of the Planning Sub-Committee considers should be referred to the Planning Sub-Committee for determination;*

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Report for:	Regulatory Committee	Item Number:	
Title:	North London Waste Plan – Pre-Submission Version		
Report Authorised by:	Lyn Garner, Director of Planning, Regeneration and Development		
Lead Officer:	Matthew Patterson, Head of Strategic Planning		
Ward(s) affected: All	Report for Key/Non Key Decisions: Key Decision		

1. Issues under consideration

- 1.1 This report highlights the main issues arising from consultation (Regulation 18) on the Preferred Option draft of the Joint North London Waste Plan (NLWP) and how these issues have been addressed in the Pre-submission version of the NLWP (attached at Appendix A).
- 1.2 Approval is now being sought from all seven local authorities to publish the Pre-submission document (Regulation 19) and following publication, to submit the document to the Secretary of State for Examination in Public.

2. Recommendations

Regulatory Committee is recommended to:

- A) Note the summary of the key issues raised through the consultation on the Preferred Option draft of the North London Waste Plan (NLWP) and how these have been addressed in the Pre-submission NLWP, as set out in the main body of this report.
- B) Provide comment, if any, on the Pre-submission version of the NLWP (attached at Appendix A) thereto for reporting to Cabinet.
- C) Recommend (subject to (B) above) that Cabinet endorse the Pre-submission version of the NLWP for reporting to Full Council for its consideration and approval to publish and submit to the Secretary of State for Examination in Public.

3. Alternative options considered

- 3.1 The seven North London Boroughs, as Waste Planning Authorities (WPAs) are statutorily required to prepare a Waste Local Plan.
- 3.2 In line with the National Planning Policy Framework (paragraph 182) to ensure the NLWP is justified, a range of options have been tested through the preparation of the NLWP to demonstrate that all reasonable alternatives have been considered and that the subsequent Plan (attached at Appendix A) is the most appropriate strategy/approach.

4. Background

What is the NLWP?

- 4.1 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 ('NLWP'). The NLWP will cover the period 2017 to 2032 and, once adopted, it will form part of the statutory Development Plan for these areas.
- 4.2 The purpose of the NLWP is firstly 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 secondly to provide policies against which planning applications for waste development will be assessed, alongside other relevant planning policies/guidance.

Consultation

- 4.3 Consultation on the Preferred Option version of the NLWP took place over a nine week period during 30th July 2015 to 30th September 2015. The Draft Plan provided the first opportunity for stakeholders to make comments on the strategy for future waste management in North London, potential locations for new facilities across the area, and policies.
- 4.4 A total of 6,707 individuals were notified of the consultation alongside 5,050 organisations and public bodies, and 7,577 properties that were likely to be affected by the proposals.
- 4.5 Six public consultation days were held during 2nd September to 11th September. Events took place in each borough, with the exception of Camden and Islington for which a combined event was held in Camden. An additional meeting was held in Hackney about the Theydon Road area. Information about these events was included in the letter/email sent to individuals and organisations. Each consultation day included an afternoon workshop session which people were asked to register for in advance and an informal drop-in session in the evening.

- 4.6 A total of 213 representations were received. An [Interim Report](#) on the draft NLWP consultation was published on the NLWP website.

Results of consolation

- 4.7 There was general support for the draft aims, objectives and spatial strategy of the NLWP. Some textual changes were suggested including a stronger commitment to achieving net self-sufficiency.
- 4.8 The preferred approach for the Plan including maximised recycling and net self-sufficiently in a number of waste streams was on the whole supported by those in the field of waste planning. More information on the management and export for each type of waste was requested, particularly Construction, Demolitions & Excavation waste and hazardous waste. It was also suggested that this section include more information about how the NLWP is reducing exports to landfill.
- 4.9 Around 70% (148) of the comments received were objections to sites and areas. The methodology for identifying new sites and areas was broadly supported. However a number of proposed sites and areas which have been assessed as potentially suitable for waste uses through the NLWP assessment criteria were not considered suitable by local residents and community groups. The main issues raised by residents related to the potential negative impacts of a waste facility in the local area, including traffic/congestion, suitability of roads and access, effect on biodiversity, flood risk, proximity to sensitive receptors and residential areas, concern over noise, smell, pollution, vermin etc. A number of objections by landowners and tenants were also received.
- 4.10 There was broad support for the policy setting assessment criteria for waste management facilities although a number of changes were suggested to strengthen requirements or for clarification. Competing views were received from residents who want strict controls on development alongside ambitious objectives, and the waste industry who consider some of the requirements in the policy too onerous.
- 4.11 There was strong support for the policy safeguarding existing sites. It was suggested that this policy could include expansions to existing facilities. There was general support for improving coverage of Re-use & Recycling Centres across North London with some suggestions about how the policy could be improved. New policies were suggested about incorporating recycling facilities in new development, waste water and landfill/landraising.

What has been changed?

- 4.12 The Boroughs have taken into account the consultation responses in drawing up the proposed submission version of the plan. In addition the boroughs have updated the NLWP Data Study to ensure that the proposed submission plan is based on the most up to date evidence. At the same time the opportunity has been taken to resolve some technical issues raised at consultation regarding how the NLWP classifies the

recycling at waste transfer stations and how it models trade waste collected by local authorities. The result is a revised capacity gap.

- 4.13 Further work has been done to estimate how much waste in which waste streams is likely to be exported to each waste planning authority area from North London during the plan period. This is to give greater certainty to the waste planning authorities who have been taking in waste from North London. The boroughs have been engaging with these authorities under the duty to cooperate and identifying if there are any barriers to these movements continuing.
- 4.14 In preparing the Pre-submission version of the NLWP, and deciding which sites and areas to take forward, the boroughs took into account a number of factors including national and regional policies, the aims of the NLWP and consultation responses on the Draft Plan. Further work was undertaken to gather and assess any additional information on the proposed sites and areas received during the consultation or as a result of new data being published, for example sites and areas affected by Crossrail 2, groundwater, historic assets and proximity of sensitive receptors. In addition borough transport officers have undertaken broad brush highways assessments of the sites and areas. The selection of new sites and areas has been based on using a number of criteria to assess them and categorising them into Bands A to D but chiefly into Band B *“Site is suitable for waste uses following appropriate mitigation”* or Band C *“Site is possibly suitable for waste uses although there are significant mitigation issues to address”*.
- 4.15 As a result of this work, it was decided by the boroughs that there were sufficient reasons to reassess the approach to sites and areas. The boroughs considered a range of reasonable options for taking forward sites and areas in the Pre-submission version of the Plan. The revised approach is to focus on existing, well-established industrial land, and areas which performed well against the assessment criteria, while achieving a better geographical spread. An opportunity was also identified to reduce the number of sites/areas identified in the Draft Plan as suitable for waste use, while maintaining flexibility and aiming for a wider geographical spread of land in order to maximise the opportunities for waste to managed as near to its source as possible.
- 4.16 The new sites and areas have been identified for built waste management facilities. The sites and areas are being put forward as they perform well against the NLWP Spatial Framework 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.
- 4.17 As a result of this work the boroughs are proposing to take forward the list of new sites and areas set out below in para 4.29 for inclusion in the Pre-submission version of the NLWP because it includes the most suitable sites with best geographic spread.
- All Band B areas
 - All Band C areas designated as Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), except for Enfield where four Band C areas will

not be put forward because there is sufficient coverage in that borough supplied by the Band B areas

- Further clarification on the siting of new facilities is to be provided for Band C areas in the site profiles in Appendix 2 of the plan. .
- Replacement site(s) for sites affected by Brent Cross Cricklewood development in Barnet

What is in plan?

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

Existing sites

4.19 The Plan builds on the waste management capacity of existing waste sites. Existing waste sites are safeguarded for waste use in the London Plan and also through the NLWP. A change to the Plan since consultation is that appropriate expansion or intensification of existing waste sites is encouraged.

4.20 The existing safeguarded waste sites in Haringey are set out below:

HAR 1/2	Hornsey Central Depot, Haringey LBC
HAR 3	Garman Road, Tottenham
HAR 4	O'Donovan, Markfield Rd, Tottenham
HAR 5	Redcorn Ltd, White Hart Lane, Tottenham
HAR 6	Restore Community Projects, Ashley Road, Tottenham
HAR 7	Brantwood Auto Recycling Ltd, Willoughby Lane
HAR 8	O'Donovan, Markfield Road, Tottenham
HAR 9	Park View Road Reuse and Recycling Centre
HAR 10	LondonWaste Ltd. Western Road H W R C

Targets

4.21 The recycling and recovery targets built into the NLWP are as follows:

Waste stream	Target	2014 baseline
Local Authority Collected Waste	50% recycling for LACW by 2020 with 40% energy recovery from 2015	33%
Commercial and Industrial	70% recycling by 2020, 75% recycling by 2031 with 15% energy recovery from 2020	66%
Construction and	95% recycling by 2020	65%

Demolition		
Biodegradable or recyclable waste	Zero biodegradable or recyclable waste to landfill by 2026	Not known

Capacity gap

4.22 There is not enough capacity in North London to deal with the amount of waste projected. The capacity gap is identified by looking at the amount of different waste streams projected to need management at five yearly intervals and taking away the capacity that will exist at time for that waste stream. Based on assumptions regarding growth, achievement of recycling levels, net self-sufficiency in three waste streams in the Draft Plan, and the average size of facilities, the capacity gap can be translated into a need to identify 21 hectares of land.

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				
	2017	2022	2027	2032	Total
Recovery (C&I)	2 ¹ (2)				2 (2)
Recycling (C&I)				2	2
Recycling (C&D)	0	6	5	1	12
Recycling (Hazardous)	2				2
Recovery (Hazardous)	3				3
TOTAL land required in North London	7 (2)	6 (0)	5 (0)	3 (0)	21 (2)

4.23 Most Local Authority Collected Waste is managed at the Edmonton EcoPark facility. The existing Edmonton facility will be replaced in 2025. The North London Waste Authority (NLWA) is pursuing a Development Consent Order (DCO) for a new Energy Recovery Facility (ERF) with capacity of around 700,000 tonnes per annum to deal with all the residual waste under the control of the Authority from 2025 until at least 2050.

4.24 Until 2025 there is sufficient capacity for recycling for both Local Authority Collected Waste and Commercial & Industrial waste streams. As many existing facilities can manage both waste streams, the need for recycling is combined. As recycling rates increase, this capacity becomes exhausted towards the end of the plan period where a gap appears. Otherwise the capacity gaps are in waste management areas where private operators can be expected to take the lead in promoting development. The major requirement is for capacity to manage construction and demolition waste.

¹ The existing Edmonton EfW only accepts LACW, however the replacement facility may be able to take C&I. Should this be the case, the Edmonton facility would assist in meeting Recovery requirements during the plan period. Although a short term need is identified, it is unlikely this would be built within a time frame that would meet this need.

- 4.25 The NLWP will identify sufficient land to manage the equivalent of all Construction and Demolition (C&D) waste arising in North London by 2032, while acknowledging that some exports will continue, particularly for Excavation waste. A total of 12 hectares of land will be required to facilitate this recycling provision. Recycling opportunities are likely to be mainly for C&D wastes although around 45% of excavation waste is also currently recycled within North London. Opportunities to re-use CD&E waste locally will be supported, with the remainder being disposed of directly to landfill outside the plan area.
- 4.26 Another part of the capacity gap relates to hazardous waste. All the waste streams include some hazardous waste. Hazardous waste is managed in specialist facilities which have and depend on wide catchment areas for their economic feasibility. North London has a limited number of such facilities, mainly metal recycling and end of life vehicles, although other facilities are permitted and carry out management of hazardous waste as part of their regular operation. There remain gaps in provision. The areas identified in this plan have been assessed for their potential suitability for such facilities. Any applications for hazardous waste facilities in North London that do come forward will be considered on a case by case basis. However, in the short term it is likely that hazardous waste will continue to be exported to the most appropriate specialist facilities.
- 4.27 The North London boroughs have estimated and consulted on future exports to landfill for each of the main recipients of North London's waste. A number of facilities in receipt of the boroughs' waste sent for landfill are due to close during the NLWP plan period. The amount of waste affected by these closures has been identified. The Boroughs have established that there is both alternative sites and adequate void space in London, South East and East of England to take North London's estimated waste exports between 2017 and 2032.

New sites and areas

- 4.28 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 is in principle suitable for waste use but where land is not specifically safeguarded for waste.
- 4.29 The following sites and areas are included:
- Oakleigh Road, Barnet (3.1ha)
 - Brunswick Industrial Park, Barnet (3.9ha)
 - Mill Hill Industrial Estate, Barnet (0.9 ha)
 - Connaught Business Centre, Barnet (0.9 ha)
 - Replacement site(s) for BXC redevelopment, Barnet (size TBC)
 - Freezywater, Enfield (10.7ha)
 - Brimsdown, Enfield (134.4ha)

- Meridian Business Park, Enfield (14.9ha)
- Eley’s Estate, Enfield (61.6ha)
- Millfields LSIS, Hackney (2.1 ha)
- Brantwood Road, Haringey (16.9ha)
- North East Tottenham, Haringey (15.4ha)
- Friern Barnet Sewage Works, Haringey (5.95ha)
- Argall Avenue, Waltham Forest (27.9ha)
- Palace Close SIL, LLDC/ Hackney (0.9 ha)
- Bartrip Street LSIS, LLDC/ Hackney (0.6 ha)
- Bus Depot, Temple Mill Lane, LLDC/Waltham Forest (2.1 ha)

4.30 Three of the areas lie within the area of the London Legacy Development Corporation (LLDC) because they are the planning authority for small parts of Hackney and Waltham Forest and so the boroughs cannot make planning allocations in their area. Under the MoU that the boroughs have agreed with the LLDC, three areas have been identified as potentially suitable for waste use. Two of these are in the geographic area of Hackney and one is in Waltham Forest

4.31 The distribution of sites and areas is shown in the table below.

Boroughs	Proposed Option
Barnet	4 (areas) +1 (site)
Camden	0
Enfield	4
Hackney	1
Haringey	3
Islington	0
Waltham Forest	1
LLDC	3
Total Hectares	>302.25

4.32 Based on an analysis of vacancy rates and business churn in industrial areas, it is estimated that 15.6ha of vacant land is currently available to meet waste management needs in North London and that an estimated 60ha could become available over the plan period as a result of business churn. There is significant churn in the industrial sector that will enable sites in industrial areas to come forward for waste uses. It is expected that waste uses will continue to be able to compete with other industrial uses and benefit from inward migration of firms, as London moves towards an industrial sector which services its own economy and population.

Policies

4.33 The seven development management policies remain from the draft version of the Plan with amendments to take into account consultation responses. The policies cover existing sites; site allocation; identification of areas for new waste facilities; windfall sites; Re-use and Recycling Centres; assessment criteria for waste management facilities; and energy recovery. The revised policies include assessment

of cumulative impacts of waste developments to provide some safeguards against over provision in any one area or borough. There are also two new policies covering waste water and control of inert waste, both issues raised through consultation.

Consultation on proposed submission/ Rest of timetable

4.34 The proposed submission version is going to cabinets and Full Councils in each of the seven boroughs in June and July. Following that it is intended to consult on the document from the end of July to the end of September. Following that, the boroughs will submit the plan to the Secretary of State for examination in early 2017. A public hearing is expected in spring 2017 and the Inspector's report in late summer. This should enable boroughs to adopt the plan by the end of 2017.

Next steps

4.35 The draft Joint North London Waste Plan is on the cabinet agenda for July 2016. A decision is need by July to enable 6-8 weeks consultation start end of July to the end of September 2016. Below is a timetable setting out the progress of this document.

Tasks	Time
Full Council approve proposed submission plan (Regulation 19)	July 2016
Consultation on proposed submission plan (Regulation 19)	Summer 2016
Amendments made by Boroughs	January 2017
Adoption	Autumn 2017

4.36 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.

4.37 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.

5. Contribution to strategic outcomes

5.1 The preparation of the NLWP contributes to outcomes in Priority 4 and 5 by ensuring sufficient infrastructure, in the form of waste management provision, is available to cater for existing and proposed development and growth across the borough and North London.

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

- 6.1 Under the NLWP MoU the boroughs have agreed to share the costs equally. The costs to be shared include the cost of the consultants, the two members of staff employed by Camden as lead borough for the various consultations and of the examination. The cost over 5 years is expected to be £169,000 per borough or an average of £34,000 per year. There are two more years left. Haringey Council has made financial provision for this expenditure.

7. Head of Legal Services and legal implications

- 7.1 The Council agreed a revised Memorandum of Understanding (MoU) about joint working on the NLWP in July 2015. This has been agreed and signed by all the other boroughs. The MoU sets out how the boroughs will cooperate to carry out the work will be carried out, makes Camden the lead borough and deals with financial matters and dispute resolution.
- 7.2 The boroughs will be consulting on the proposed submission NLWP under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

8. Use of Appendices

- 8.1 Appendix A: Pre-Submission draft of the North London Waste Plan

9. Local Government (Access to Information) Act 1985

- 9.1 All relevant information, including evidence base studies and previous iterations of the NLWP can be found on the North London Waste Plan webpage at www.nlwp.net

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:

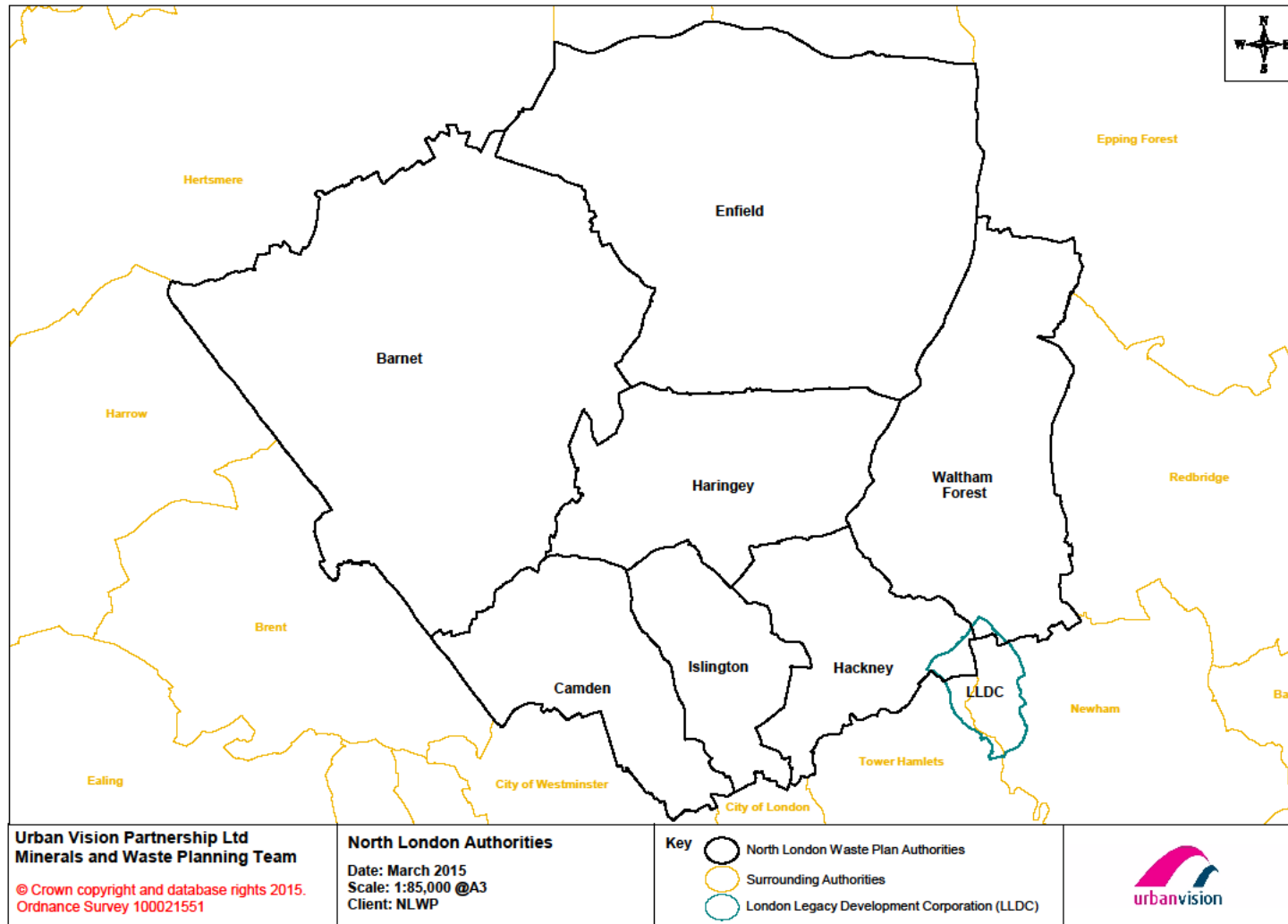
The Aim and Objectives: These are overarching principles which have steered the development of the NLWP.

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 are 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 (December 2013) contains an imperative for waste planning authorities to develop local authority waste plans, as does the National Planning Policy for Waste (NPPW). This plan is being prepared to fulfil the statutory responsibilities of the seven North London Boroughs under the planning system having regard to the national plan and policy.

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 supporting Planning Practice Guidance (PPG) also direct 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 Plan¹ 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

¹ At time of writing this is The Spatial Development Strategy For London Consolidated With Alterations Since 2011 (March 2015) also known as London Plan March 2015
North London Waste Plan Proposed Submission April 2016

wider Development Plan. The Mayor who is elected in May 2016 will decide whether to carry out a full review of the London Plan. The North London Boroughs will monitor progress on this in order to reflect any relevant changes of policy in the NLWP.

- 1.8. The London Plan with which the NLWP, being a Local Plan, must confirm generally contains a range of planning policies covering the gamut of economic, environmental, transport and social matters with which together form the overall strategic plan for London. Importantly, it 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.

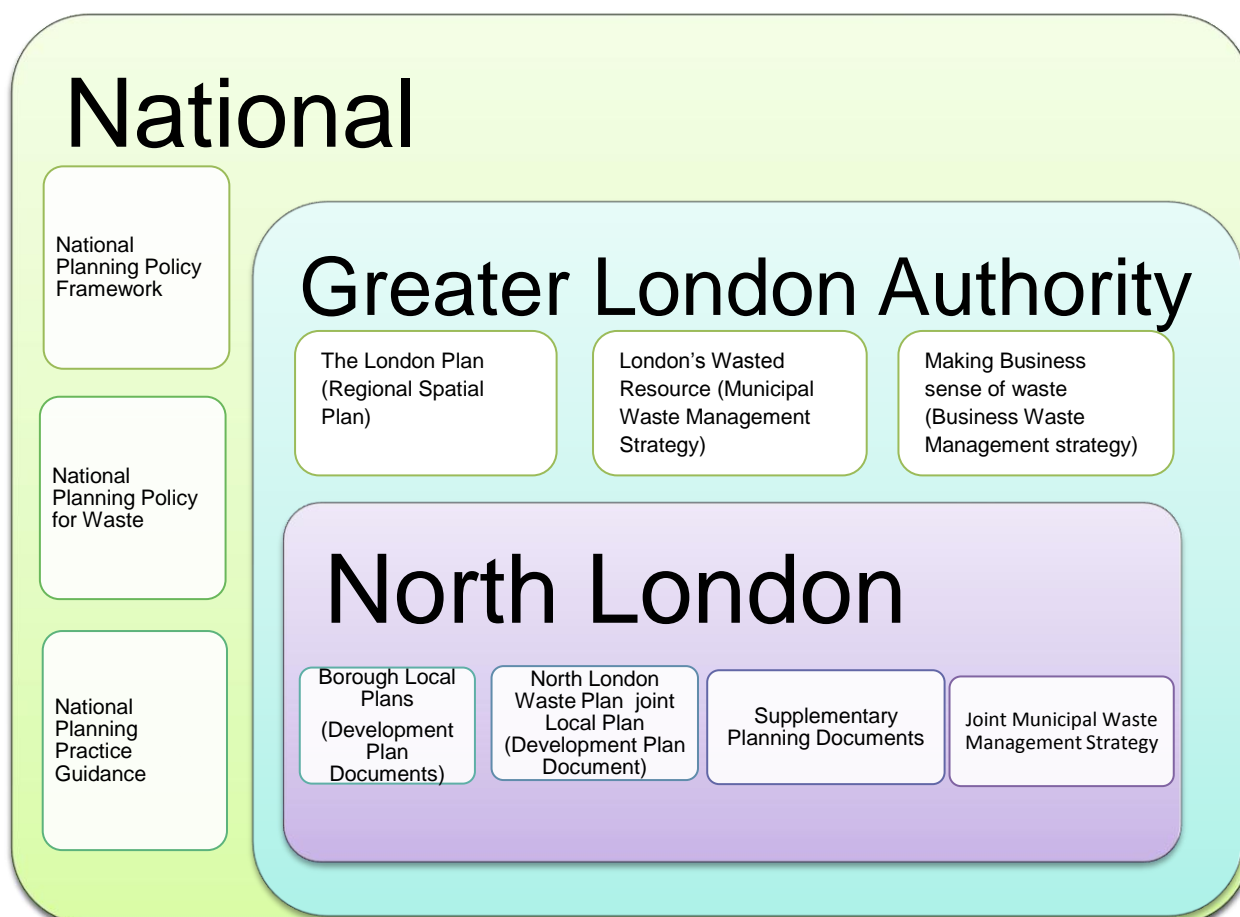
- 1.9. Each of the seven boroughs has an adopted Core Strategy as part of their Local Plan; these contain an overarching policy on sustainable waste management. The Core Strategies provide the borough-wide strategic policy direction for the development of the NLWP which will provide a more detailed planning 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) (2009); and the London Mayor’s Waste Management Strategies “London’s Wasted Resource” (2011) (on the management of municipal waste) and “Making Business Sense of Waste” (2011) (a business waste management strategy).
- 1.11. The North London Waste Authority (NLWA), being 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 the NLWP in context.

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;
 - Borough Local Plan documents including the Core Strategy, Development Management policies, Site Allocation Documents, Area Action Plans;
 - Other relevant Borough planning documents including Supplementary Planning Documents (SPDs)/ 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'.
- 1.16. The duty to co-operate was introduced by the Localism Act 2011. Local planning authorities are required to formally co-operate with other local planning authorities and bodies prescribed in the Town and Country Planning (Local Planning) (England) Regulations 2012 on strategic matters. These are defined as matters relating to the sustainable development or use of land that would have a significant impact on at least two local planning authorities or on a planning matter that falls within the remit of a county council, for example waste and minerals planning. The duty requires local planning authorities and other public bodies to engage constructively, actively and on an ongoing basis to develop strategic policies. Meeting the requirements of the duty to co-operate is a key part of the plan making process for the NLWP and the North London Boroughs are working closely with other waste planning authorities that are critical for the delivery of an effective waste strategy for North London, in addition to prescribed public bodies such as the Environment Agency.
- 1.17. In addition, the North London Boroughs are working closely with the London Legacy Development Corporation (LLDC). The LLDC is a Mayoral Development Corporation with responsibility for securing the regeneration of an area of London focused on the former Olympic Park. The LLDC is the local planning authority, which includes waste

planning, for small parts of the North London Boroughs of Hackney and Waltham Forest (and other boroughs not part of the NLWP group). However, while all the Boroughs have an apportionment of waste from the Mayor under the London Plan for which they must plan and find land, the LLDC is not allocated a share of the borough apportionment. The NLWP is required therefore to plan for the quantity of waste generated across the seven boroughs including the parts of Hackney and Waltham Forest that lie within the LLDC area. In carrying out their responsibilities under the NPPW, the North London Boroughs are engaging with other planning authorities in the country which import waste from North London including the LLDC area. The NLWP cannot directly allocate sites/areas within the LLDC area as this is the responsibility of the LLDC as 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. 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 \(2014\)](#).
- 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. The Boroughs have supplemented this information with the latest available data from the Environment Agency.
- 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 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 Proposed Submission Plan (Regulation 19). It has been prepared following consideration of responses received to the consultation on the draft NLWP (Regulation 18) which took place from 30th July – 30th September 2015. The consultation provided an opportunity for stakeholders and communities to comment on the draft plan and proposed policies. A report on the outcomes of this consultation is available here. A separate report of the previous consultation at the outset of plan preparation is also available to view on the website.
- 1.26. Six two-part public consultation events were held from 2nd September to 11th September consisting of facilitated afternoon workshops requiring registration and evening drop-in sessions. These took place in each North London Borough, with the exception of Islington which co-hosted a combined event in Camden close to the borough boundary. An additional meeting was scheduled in Hackney specifically concerning the suitability of the Theydon Road area for the development of waste

management facilities. The purpose of these events was to seek views from residents and interested parties on development management policies, sites and areas set out in the draft Plan. A report on the outcomes of this consultation can be found here.

1.27.

1.28. Evidence gathering to inform the preparation of the NLWP has been underway since April 2013. It comprises a Data Study (July 2014) and Data Study Update (July 2015), a Duty to Co-operate Protocol (March 2015) and Report (July 2015). The Regulation 18 Draft Plan was supported by a Sites and Areas Report, Options Appraisal and Consultation Statement.

1.29. A number of documents have been published to support this Proposed Submission Plan, These include: revised Data Study; Sustainability Appraisal; Habitats Regulations Assessment; Sequential Test; and Consultation Statement.

1.30.

1.31. The Proposed Submission Plan is the version of the NLWP that the Boroughs intend to submit to the Secretary of State for examination. It is being published to allow the opportunity for stakeholders and communities to submit representations on the soundness and legal and procedural compliance of the Proposed Submission Plan.

What happens next?

1.32. Representations made during consultation on the Proposed Submission Plan will be considered and any proposed changes considered appropriate will be submitted to the Inspector for examination along with supporting documents.

1.33. 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/Autumn 2016
Submission (Regulation 22)	Winter 2017

Public hearings	Spring 2017
Inspector's report	Summer 2017
Adoption	Winter 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*'². 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

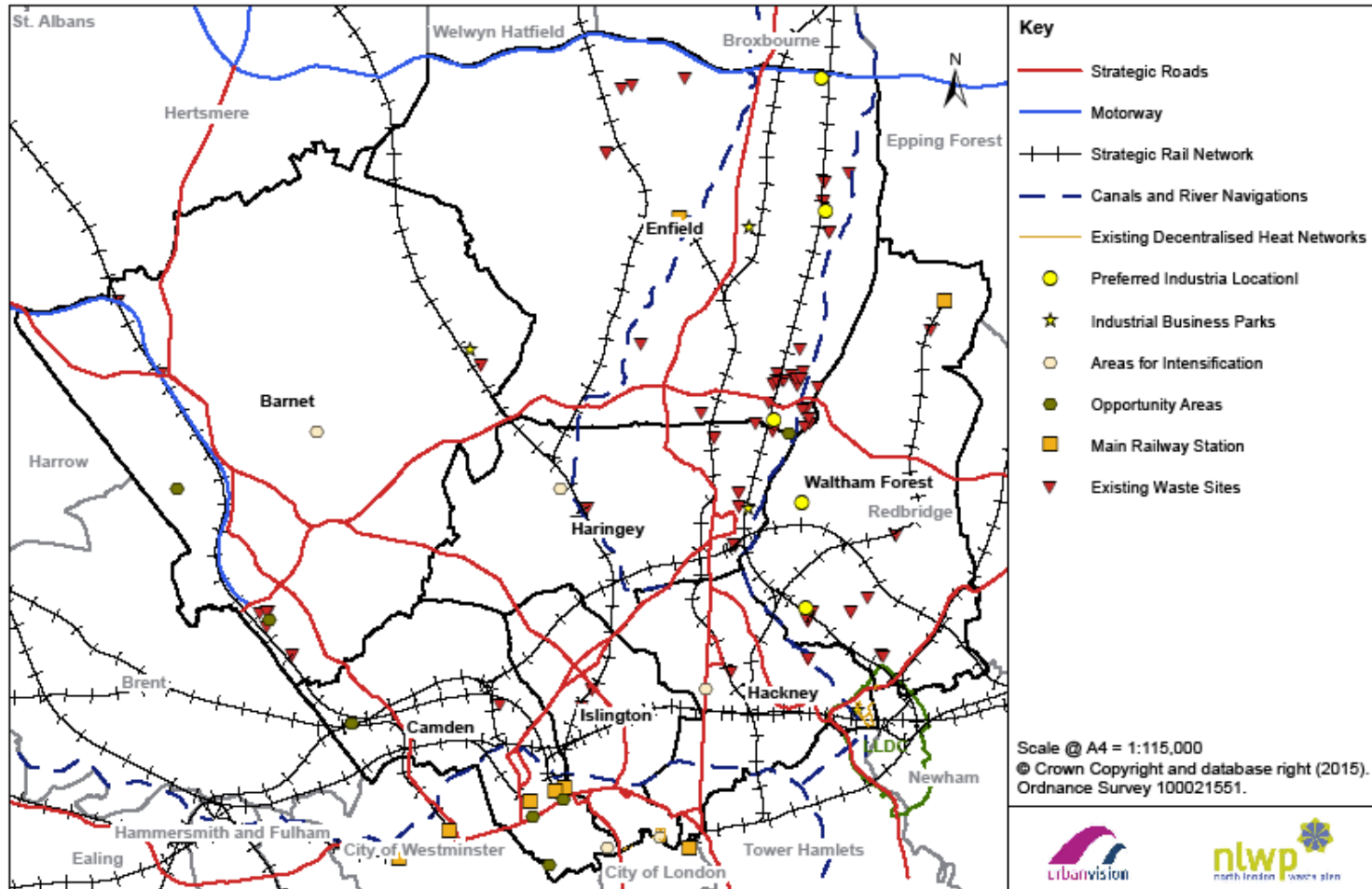
2.3. The North London Boroughs cover a large swathe of London from the inner city into the Green Belt of outer London. The geographical extent takes in both the inner London Boroughs of Camden, Hackney and Islington, and the outer London Boroughs of Barnet, Enfield, Haringey and Waltham Forest (see Figure 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

² Brundtland Commission, 1987 (Resolution 42/187 of the United Nations General Assembly)

within the North London Boroughs spans an area of 293 square kilometres. The geographical characteristics of North 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

North London Waste Plan - 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 statistics³ show that the population has risen from 1.6 million in 2002 to an estimated 1.95 million in 2014 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 according to the 2011 Census), Hackney and Camden, closely followed by Haringey. Waltham Forest, Barnet and Enfield are the least densely populated of the North London Boroughs, with the latter two below the London average, however these Boroughs are still substantially more densely populated than the rest of the country. 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 varying 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 Proposed Submission 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

³ Source of population data

of their working population employed than the national average. This is mirrored by the high cost of living in all Boroughs. At the same time, four Boroughs (Hackney, Haringey, Islington and Waltham Forest) contain wards that are amongst the 20 most deprived areas in England pointing to varying degrees of polarisation. 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'⁴ 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 and Special Protection Area (SPA)) as the reservoirs and old gravel pits support internationally important numbers of wintering birds as well as other nationally important species. In addition to this, the adjacent Epping Forest Special Area of Conservation (SAC), part of which lies in Waltham Forest, is important for a range of rare species, including mosses. 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. 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 Throughout the plan area there are many areas and sites of historic interest including 172 conservation areas, over 14,000 listed buildings, registered landscapes, scheduled monuments, archaeological priority areas and as yet unknown archaeological remains. Protection for heritage assets is included in local plan policies and the sites/areas assessment criteria (see section 7) and policy 6.

⁴ Jobs in environmental sectors

- 2.13 The heavily developed and built up nature of North London coupled with differential values between competing land uses and protected areas such as Green Belt presents a significant challenge in planning for waste. 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.
- 2.14 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.
- 2.15 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.
- 2.16 Air quality within North London is uniformly poor as a result of high levels of nitrogen dioxide and dust (NO₂ and PM₁₀ respectively) that are mainly, but not exclusively, due to road traffic. As a result, all of the councils have declared Air Quality Management Areas (AQMA) covering the entire Borough in each case.
- 2.17 The NLWP includes strategies and policies to protect environmental assets and amenity.

Transport

- 2.18 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.
- 2.19 Car ownership levels in the inner Boroughs are low compared to the national average but average in the outer Boroughs.

- 2.20 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.
- 2.21 Transport for London is consulting on the route of Crossrail 2, a proposed new railway which would connect the national rail network in Surrey with Hertfordshire running through North London. Depending on the route selected, some existing waste sites and proposed new areas might be affected, in parts of the Lee Valley in particular. Existing and proposed sites and areas may be affected by safeguarding for use as worksites or, due to proximity to a proposed station by pressure for other land uses such as housing. Known information on Crossrail2 is detailed further in the site briefs in Appendix 2 and in the proformas in the Sites and Areas Report. If approved Crossrail 2 is expected to be operational by 2030. The impact of Crossrail 2 on the NLWP will be picked up under the monitoring arrangements in section 10.
- 2.22 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.
- 2.23 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

- 2.24 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, economic, administrative, cultural, and core spanning ten boroughs in total. The Upper Lee Valley on the east of the NLWP 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 provides the strategic direction for the identification of Locally Significant Industrial Sites (LSISs) and other industrial/employment designations in Local Plans.
- 2.25 The London Plan has identified Opportunity Areas and Housing Action Zones in parts of North London including parts of the Lee Valley. There is a potential impact on existing waste operations and proposed new areas by Opportunity Areas. Many existing waste operations are carried out in areas designated as Opportunity Areas

and the Areas cover 95% of the proposed new locations. The identified areas unaffected by such designation would not be able to provide sufficient land to meet the capacity gap over the life time of the NLWP. Opportunity Areas need to be developed in a way that safeguards and enhances employment and industrial land and floorspace in a balanced manner alongside the need to identify additional housing capacity.

- 2.26 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. There are no current plans by any of the boroughs to review their Green Belt boundaries. This may change in the lifetime of the NLWP as a result of the review of the London Plan and of Local Plans.

Climate Change

- 2.27 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.
- 2.28 All Boroughs have lower CO₂ 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 CO₂ emissions from road transport when compared to the national average. This is particularly apparent in Camden, Hackney, Haringey, Islington and Waltham Forest. Per capita CO₂ emissions from the domestic sector are below the national average.
- 2.29 The NLWP seeks to reduce the reliance on disposal to landfill sites outside London as this contributes to CO₂ emissions from transport as well as the decomposing buried waste. It is recognised that waste management facilities will continue to generate CO₂ 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.
- 2.30 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.
- 2.31 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.

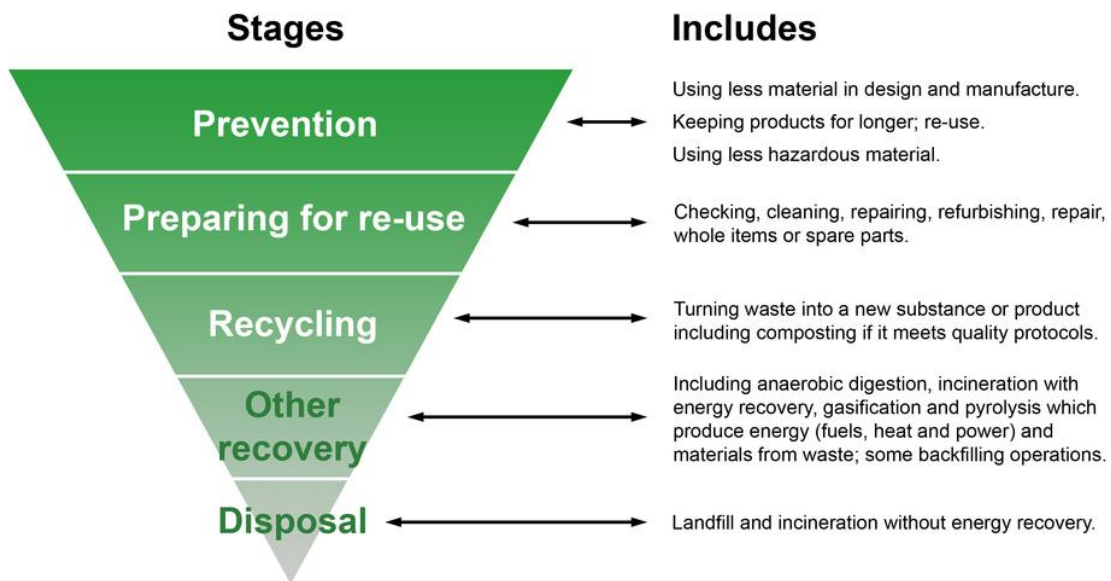
3. Aims and Objectives

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. 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 spanning strategies which influence but are outside of the planning framework. The NLWP aim and objectives reference and integrate the Waste Hierarchy which is shown in Figure 5.

Figure 5: Waste Hierarchy

The Waste Hierarchy



3.3. The aim of the NLWP is:

Aim of the NLWP

“To achieve net self-sufficiency for four waste streams 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 the sustainable development of waste facilities that are of the right type, in the right place and provided at the right time to enable the North London Boroughs to meet their waste management needs throughout the plan period”.

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 and reduce the movements of waste through safeguarding existing sites and identifying locations for new waste facilities;
Met through Policies 1, 2, 3, 4 and 5
- SO3. To plan for net self-sufficiency in LACW, C&I, C&D and hazardous waste by providing opportunities to manage as much as practicable of North London’s waste within the Plan area taking into account the amounts of waste apportioned to the Boroughs in the London Plan, and the requirements of the North London Waste Authority.
Met through Policies 1, 2, 3, 4 and 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 a low carbon economy 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

4. Spatial Framework

- 4.1 The spatial framework flows from the Plan's objectives and takes account of the spatial context outlined in chapter 2 and the strategic and policy context outlined in chapter 1, alongside the Plan's technical evidence base, and the views of stakeholders. Figure 6 below shows the relationship between the key elements that form the spatial framework.

- 4.2 The spatial framework provides the strategic direction for the detailed policies of the NLWP and part of the assessment criteria for site/area selection. The spatial framework also provides criteria to assess the suitability of windfall sites under Policy 4. It reflects the complexities and realities of planning at a sub-regional level taking into account varied characteristics and functions across the seven boroughs, from densely populated urban areas to stretches of Green Belt, . Competing and changing land uses, especially release of industrial land for housing, is a key issue for the boroughs.

- 4.3 The spatial principles set out below represent the outcome of balancing various priorities, opportunities and constraints, in particular the availability of sites/areas to achieve a deliverable distribution of waste management locations to meet identified need, whilst bringing social, economic and environmental benefits of new waste management facilities to North London.

- 4.4 The NLWP is underpinned by the following spatial principles:
 - A. Make use of existing sites

- B. Seek a geographical spread of waste sites across North London to achieve net self-sufficiency and reduce exports
- C. Encourage co-location of facilities and complementary activities
- D. Provide opportunities for decentralised heat and energy networks
- E. Protect local amenity
- F. Support sustainable modes of transport

A. Make use of existing sites

- 4.5 NPPW requires Boroughs to consider the capacity of existing operational facilities in meeting identified need. Further to this, Policy 5.17 *Waste Capacity* of The London Plan requires boroughs, when preparing plans, to protect and facilitate the maximum use of existing waste sites.
- 4.6 In line with this and in order to recognise the valuable contribution existing waste facilities make to managing waste effectively, existing waste management capacity has provided the baseline for identifying the waste management capacity gap and the consequent need for expanded and new facilities. Existing waste management sites form an important part of the strategic waste plan for North London and are safeguarded for waste use through NLWP Policy 1 (see Schedule 1 in Appendix 1 for a full list of existing sites).
- 4.7 Figure 6 shows that the majority of existing waste sites are located to the east of the Plan area in the industrial parts of the Lee Valley corridor. These sites have developed over decades outside of a strategic plan for waste, and in locations which may have been suitable for waste uses but which did not create an even geographical spread across North London. This reflects the mixed function and character of the Plan area, notably in terms of significant differences among the boroughs in supply of industrial land where waste uses are generally more acceptable.
- 4.8 Three existing sites are known to be planning capacity expansion or upgrades to existing facilities (see Expansion of existing Waste Management Facilities in Section 8). 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 expansion or intensification of operations at existing facilities and this is reflected in Policy 1.

B. Seek a geographical spread of waste sites across North London to achieve net self-sufficiency and reduce exports.

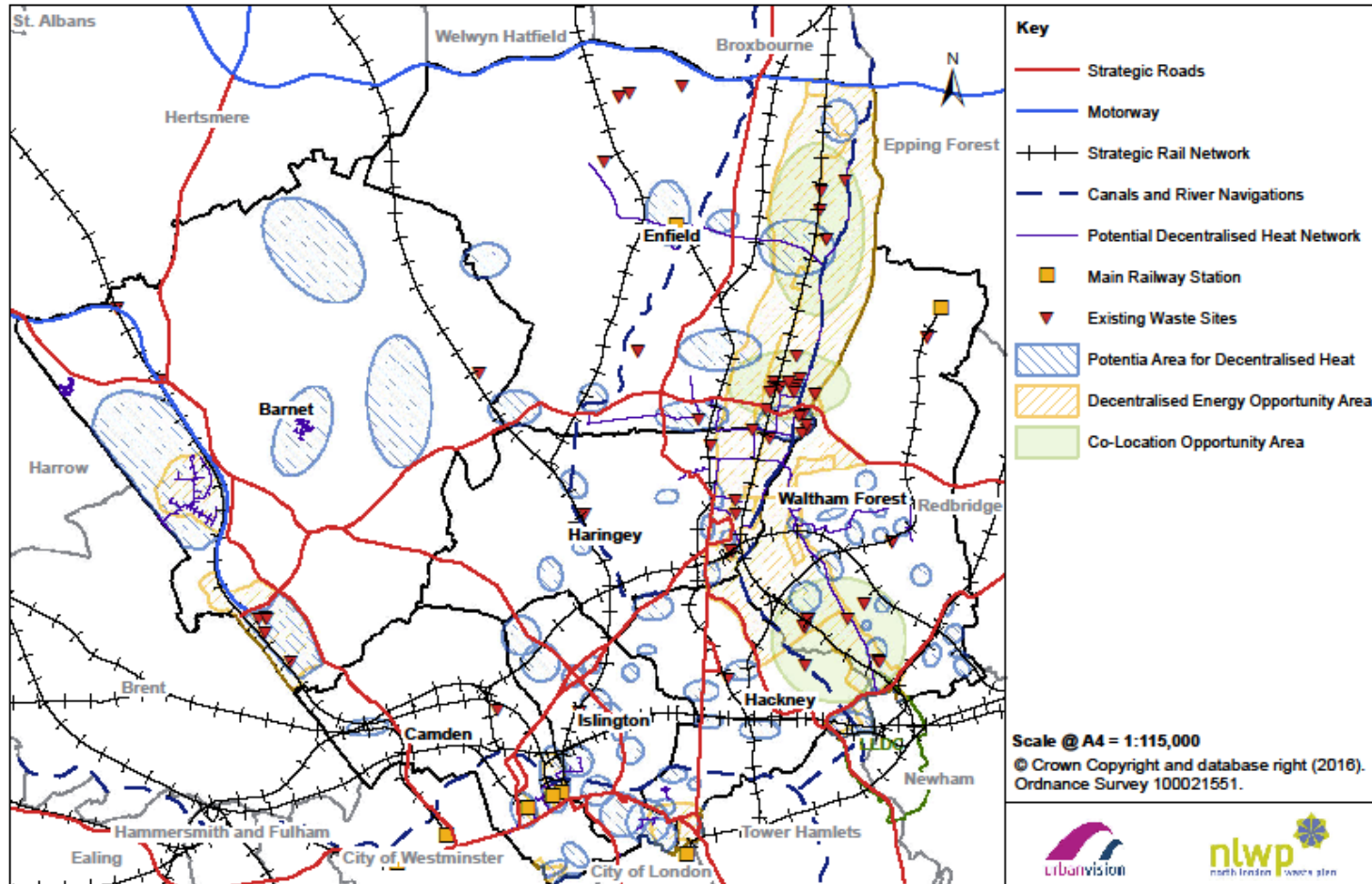
- 4.9 The NLWP is underpinned by an aim to achieve net self-sufficiency for four waste streams; LACW, C&I, C&D and hazardous waste. This will be achieved by identifying enough land in North London suitable for the development of waste management facilities to manage the equivalent of 100% of this waste arising in North London. The objective is to reduce waste exports and increase the amount of waste managed

in proximity to its source. Waste is exported to a number of areas outside of North London, mainly in the south east and east of England and Figure 12 shows the estimated reduction of waste exports over the plan period. The strategy for achieving net self-sufficiency is set out in the Provision for North London's Waste to 2032 in section 7.

- 4.10 Net self-sufficiency does not mean that the North London authorities will deal solely with their own waste, nor promote use of the absolute closest facility to the exclusion of all other considerations. While it is desirable for waste to be treated as close as possible to its source in line with the proximity principle, the complexity of the waste management business poses challenges. Different types of waste require different types of management and facilities need to serve catchment areas large enough to be economically viable. Consequently, the most suitable facility may be not be the nearest and may well be outside of North London. In addition, facilities in North London will continue to manage waste from outside the area.
- 4.11 The character of each borough's industrial land is a consideration in choosing new sites and areas. Larger and co-located facilities are more likely to be in areas with similar existing uses away from urban centres and sensitive receptors. Conversely, the urban environments of the inner London authorities experience severe physical constraints limiting opportunities for some types of waste facilities and some areas such as the protected Green Belt in the north will be largely out of bounds for any built waste facilities. By identifying suitable land across North London (Policy 2), the NLWP seeks to achieve a better geographical spread of waste facilities to manage waste as close to its source as possible and avoid any negative cumulative impacts resulting from a concentration of waste facilities.
- 4.12 Policies 2 and 3 seek to extend the existing spread of locations for waste facilities by identifying new sites and areas which are suitable for waste uses, taking into account factors such as the character of different areas, changing land uses and availability of suitable industrial land. Where demand arises, opportunities to improve the spread of waste sites across the area are supported through Policy 4: Windfall Sites.
- 4.13 When it comes to local re-use and recycling centres it is desirable to have a geographical spread that enables good access to residents. Figure 7 shows the current network of local re-use and recycling centres (RRC) and a radius of two miles around them. Gaps in coverage have been identified by the NLWA in parts of the Plan area, namely Barnet and Enfield, shown outside of the two mile radius around each RRC. Any new RRC facilities will be assessed against Policy 5: Re-use and Recycling Centres.

Figure 6: Key diagram

North London Waste Plan - Key Diagram

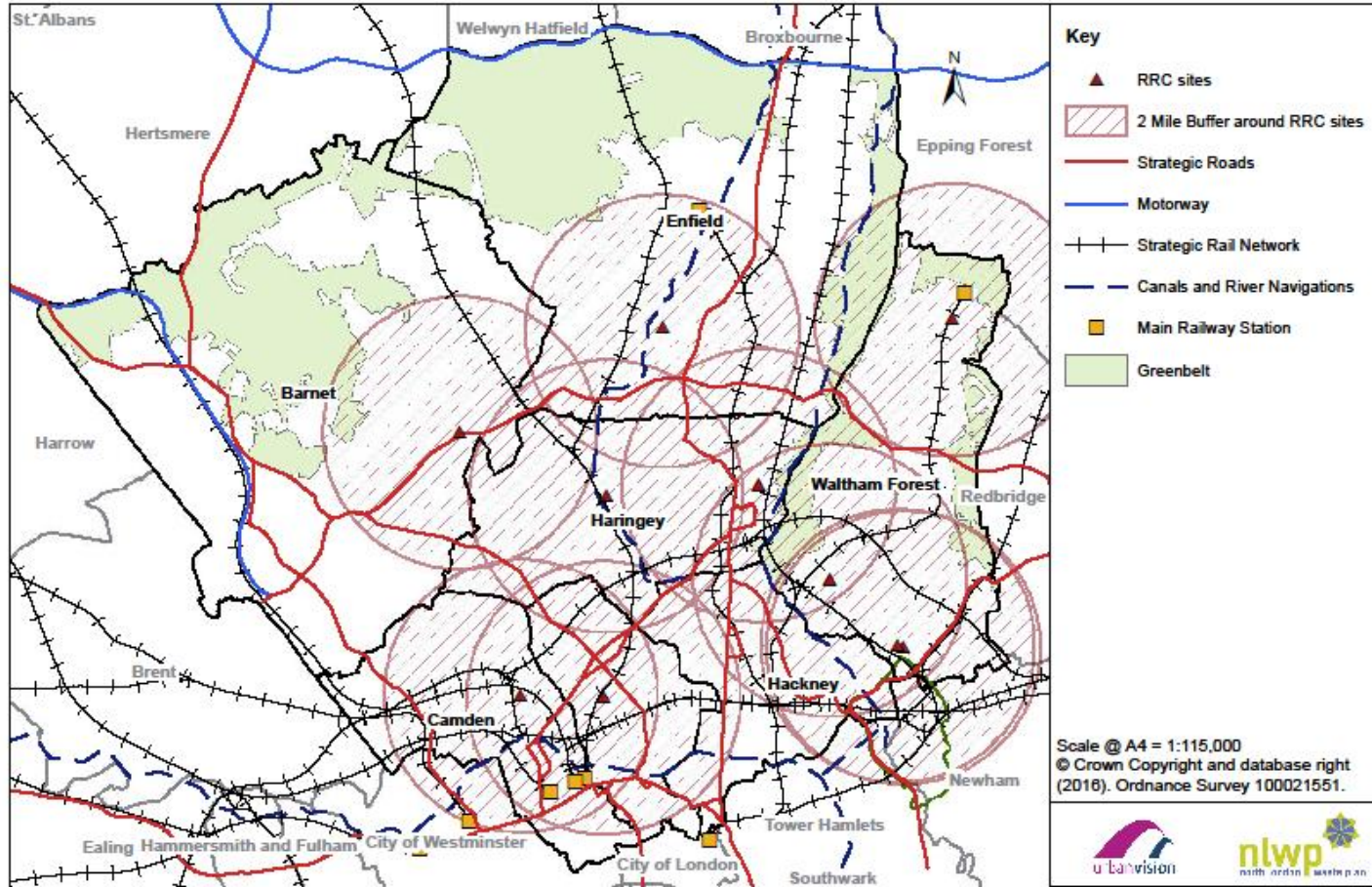


C. Encourage co-location of facilities and complementary activities

- 4.14 NPPW requires waste plans to identify opportunities to co-locate facilities together and with complementary activities, including end users of waste outputs such as users of fuel, low carbon energy/heat and recyclates.
- 4.15 There are several benefits of co-location of facilities. 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. The concentration of waste facilities in the Lee Valley corridor provides the most promising opportunities for co-location with existing facilities. Notwithstanding this, NPPW requires the Plan to take account of the cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community..
- 4.16 There are also co-location opportunities related to other industrial activities synergistic with waste management, for example the manufacturing of products from recycled materials and the development of a more circular economy. Existing waste facilities are already employing this approach as exemplified by the industries developing around the Edmonton EcoPark (Enfield) and the Plan seeks to build on the momentum by supporting this approach as a key element of the spatial framework and identifying which areas have potential for co-location.
- 4.17 Opportunity Areas, Housing Zones and the route of Crossrail 2 could also be factors when considering co-location of facilities. These schemes are likely to intensify development, especially near to stations, and there are both resulting opportunities and threats for existing waste facilities and land identified as suitable for waste uses. The opportunities include waste facilities supplying energy to new developments and new waste facilities being incorporated into the schemes, for example an anaerobic digestion facility to deal with household food waste. Risks include new uses displacing waste facilities due to incompatibility. Protection for waste capacity through the London Plan, Local Plans and NLWP Policy 1 will be a key policy tool under these circumstances.

Figure 7: Current RRCs in North London

North London Waste Plan - Current RRCs in North London



D. Provide opportunities for decentralised heat and energy networks

- 4.18 Higher level policy and guidance, including NPPW, also recognises the benefits of co-location of waste facilities with end users of their energy outputs. The London Plan supports the development of combined heat and power systems and provision of heat and power to surrounding consumers.
- 4.19 The Spatial Strategy Map above (Figure 6) shows where facilities could connect to a network ('decentralised heat opportunity area' and 'decentralised energy opportunity area'). There is already a relatively well-advanced plan for decentralised heat network in the Lee Valley and this offers the most promising and realistic possibility within the plan area. The NLWP supports opportunities to develop combined heat and power networks on sites and areas, within the Lee Valley, south Barnet and elsewhere (see Figure 6), that not only have the ability to link in to the decentralised energy network but also have the potential for waste development with Combined Heat and Power. Policy 7 seeks to secure opportunities for the recovery of energy from waste where feasible.

E. Protect local amenity

- 4.20 The protection of amenity is a well-established principle in the planning system. This is recognised in NPPW, which requires the Boroughs to consider the likely impact on the local environment and on amenity when considering planning applications for waste facilities. Amenity is generally agreed to include aural (noise) and visual amenity such as open space, flora, and the characteristics of the locality like historic and architectural assets.
- 4.21 The site selection criteria set out in Chapter 8 effectively direct waste management development to the most suitable sites/areas taking into account environmental and physical constraints, including locations where potential amenity impacts can be mitigated to an acceptable degree.
- 4.22 The protection of local amenity was considered during the assessment of sites/areas to identify those suitable for inclusion in the NLWP. Policy 6 sets out assessment criteria for waste management facilities deals with protection of local amenity including information requirements to support applications for waste facilities. The policy's presumption for enclosed as opposed to open air facilities is also important to the application of this principle in terms of air quality and protecting the health of residents.

F. Support sustainable modes of transport

- 4.23 NPPW and the London Plan requires Boroughs to seek to identify sites/areas with the potential to utilise use modes of transport other than road transport. As Figure 6 shows, North London is well served by road, rail and waterway networks and waste is currently transported in to, out of and around North London by both road and rail. But like many industry sectors, road is the main mode of transport for the movement of waste. There are potential opportunities for waste sites to better utilise sustainable modes of transport such as rail and waterways and movement of waste via more sustainable transport methods is duly supported in line with Objective 7. While this may be beneficial, it may not always be practicable especially where there is a lack of existing functional infrastructure. Costs associated with Investment in wharfs and rail sidings and other infrastructure which may be necessary before waste can be moved along the canal or rail network may not be economically viable, especially for smaller facilities. North London currently has one rail linked waste site (at Hendon) supporting the requirements of the North London Waste Authority (NLWA), however this site is due to be redeveloped as part of the Brent Cross Cricklewood regeneration project. There is also a wharf on the Lee Navigation which potentially could provide future opportunities for transportation by water at Edmonton EcoPark.
- 4.24 While more sustainable modes of transporting waste are desirable, road transport will continue to be the principal method of transporting waste in North London, particularly over shorter distances where this is more flexible and cost effective. Access to transport networks including sustainable transport modes was considered when assessing the suitability of new sites and areas. Consideration of sustainable transport modes has also been carried over to Policy 6 for the purpose of determining planning applications.

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 prepared in July 2014 and updated in July 2015 to inform the Draft NLWP. A further update in 2016 accompanies this Proposed Submission Plan. . All versions of the Data Study are available to view on NLWP website (www.nlwp.net). The Waste Data Study is in

three parts as shown below, with the date of the most recent version provided in brackets.:

- Part One: North London Waste Arisings (2016)
- Part Two: North London Waste Capacity (2016)
- Part Three: North London Sites Schedule (2014)

5.3 The Waste Data Study includes the following information for the seven waste streams for which the NLWP plans:

- The amount of waste currently produced in North London;
- How and where the 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 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 on an annual basis, data for the other waste streams is widely acknowledged to be imperfect. The National Planning Practice Guidance on waste recognises the challenge of obtaining up to date and reliable waste data. Against this backdrop, 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

5.5 Table 2 below shows the amount of waste generated in North London for the main waste streams using the latest data from 2014. Waste arisings vary from year to year and these figures represent a moment in time. Figure 8 shows the proportion of each waste stream as a percentage of the total waste in North London⁵.

Table 2: Amount of Waste Generated in North London, 2014

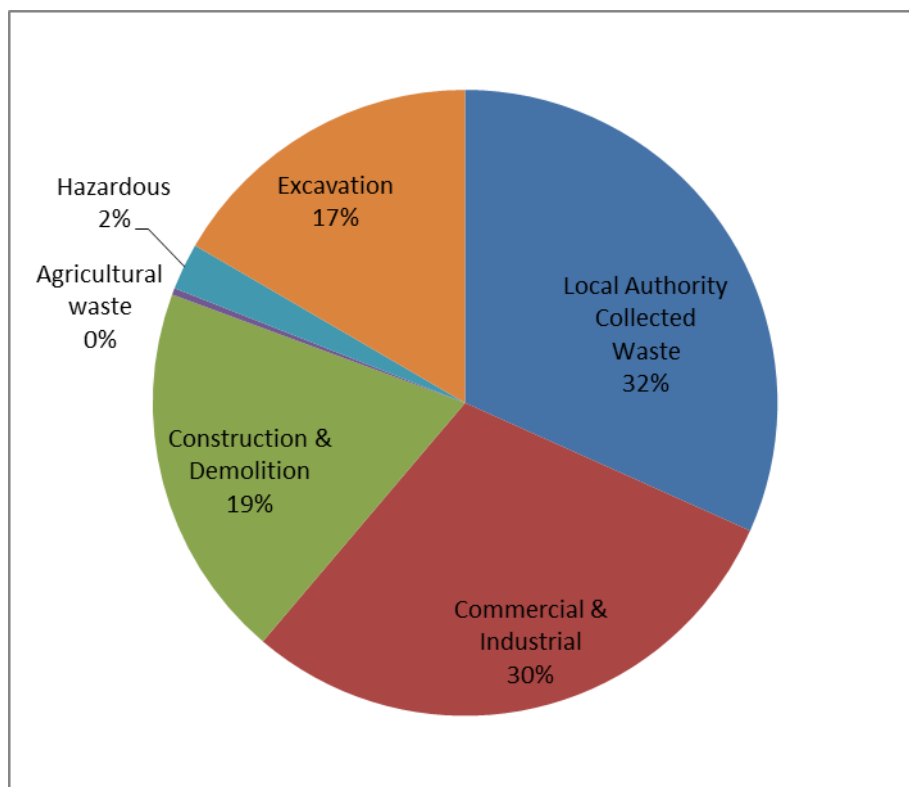
Local Authority Collected Waste (LACW)	845,043
Commercial and Industrial Waste (C&I)	786,660

⁵ The data is taken from the Waste Data Study (2016)

Construction and Demolition Waste (C&D)	517,720
Agricultural Waste	9,223
Hazardous waste	64,193
Excavation Waste	443,039
TOTAL	2,665,878

Source: North London Waste Data Study Update 2016

Figure 8: Proportion of North London Waste in Each Waste Stream 2014



Source: North London Waste Data Study Update 2016

Current facilities

5.6 Table 3 below shows the existing (2017) waste management facilities in North London by type and waste stream managed. It identifies an existing waste management capacity of around 3.3 million tonnes per annum. Figure 9 shows the location of the facilities represented in Table 3 and a full list is in Appendix 1.

Table 3: Maximum Annual Capacity at Existing North London Waste Management Facilities 2017

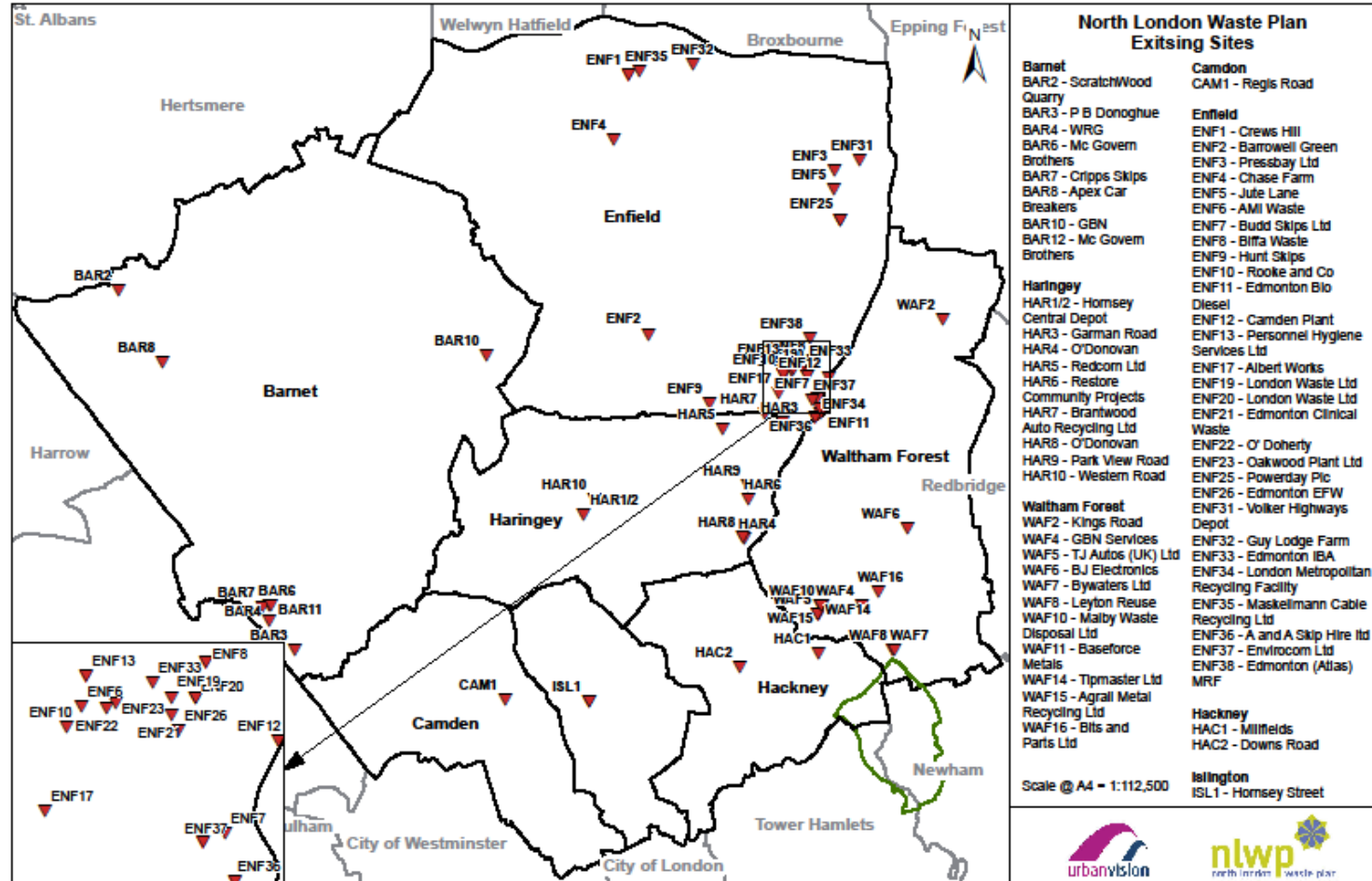
Waste stream	Facility type	Existing maximum capacity 2017(tonnes)
LACW only	Transfer stations (non-hazardous)	621,222
LACW only	Reuse & Recycling Centre	91,532
LACW only	Incineration with Energy Recovery	550,000
LACW and CI	Transfer stations (non-hazardous)	72,530
LACW and CI	Transfer stations (clinical waste)	11,050
LACW and CI	Composting	35,241
LACW and CI	Recycling (MRFS)	350,000
LACW and CI	Incineration with Energy Recovery	0
LACW and CI	WEEE	5,000
LACW, C&I, CDE	Transfer stations (non-hazardous)	9,391
LACW, C&I, CDE	Reuse & Recycling Centre	2,526
LACW, C&I, CDE	Recycling (MRFS)	193,896
LACW, C&I, CDE	Recycling (Metals)	31,603
C&I only	Recycling (MRFS)	47,030
C&I only	Recycling (ELVs)	27,958
C&I only	Recycling (Metals)	365,084
C&I only	Treatment facility	107,331
C&I and CDE	Transfer stations (non-hazardous)	30,876
C&I and CDE	Transfer stations (C&D)	28,920
C&I and CDE	Recycling (MRFS)	573,855
CDE only	Treatment facility (C&D)	110,203
CDE only	Recycling (aggregates, other C&D)	410,118
Hazardous	Recycling (ELVs)	391
Hazardous	Recycling (Metals)	2,215

Hazardous	Treatment facility (Hazardous)	3,662
TOTAL		3,681,634

- 5.7 On the face of it, when considering the overall amount of waste generated identified in Table 2 against the current capacity of waste management facilities in North London identified in Table 3, there appears to be more than enough waste management capacity.. However, , this does not take into account the specialism of each type of facility or importantly, since North London is a net importer of waste in terms of tonnage, imports to and exports from the area. .
- 5.8 Some facilities in North London have a wider-than-local catchment area and manage waste from outside North London. This includes recycling and treatment facilities, in particular metal recycling and end of life vehicle (ELV) facilities. The nature and practice of the waste industry means that a significant portion of imports to North London pass through transfer facilities for sorting/bulking prior to onward treatment or disposal. Although some facilities may seem to be surplus to our needs when considered purely in terms of waste arisings in North London that they could manage, the extra capacity contributes to achieving net self sufficiency, or managing the equivalent of the overall quantity of waste within the main categories for North London and London as a whole.
- 5.9 Conversely, North London does not have all the types of facilities necessary to manage all the sub-types of waste arising within the main categories shown in Table 2. . For example, there are few hazardous waste facilities and no landfill sites in North London. This means that North London’s hazardous waste and waste requiring landfill (for example excavation waste) will travel outside the area to be managed. North London will therefore need to identify sufficient capacity to manage the equivalent amount of exported waste within its boundary.
- 5.10 Against this backdrop, the principle of net self-sufficiency informing this plan is achievable because, as outlined in Chapter 4, it allows for the movement of waste between areas necessitated by waste industry practices and constraints.

Figure 9: Existing Waste Sites

North London Waste Plan - Existing Waste Facilities



Current Waste Management

Local Authority Collected Waste

- 5.11 As shown in Chapter 5, preventing waste generation in the first place sits 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’](#)⁶ campaign which seeks to reduce food waste.
- 5.12 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.
- 5.13 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.
- 5.14 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.
- 5.15 In North London, just over 845,000tonnes of LACW was collected in 2014/15⁷. Of this, approximately 33% was recycled, reused or composted. Of the remaining LACW, 58% was sent to NLWA’s energy-from-waste facility at Edmonton and 13% was sent to landfill outside of North London.

⁶ Managed by [WRAP](#)

⁷ Figures from WasteDataFlow

- 5.16 The North London Waste Authority has reported an increase in recycling performance from 23% in 2006/7 to 33⁸% by 2014/15. This is lower than the national average of 44% but higher than the London average of around 30%. There are a number of factors which contribute towards lower recycling rates in London than the country as a whole. These include: rapid population growth; a greater transient population than anywhere else in the UK; the greater proportion of flats compared to houses which 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 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) works 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.
- 5.21 The European Commission is putting forward new legislative proposals on waste to provide a long-term vision for increasing recycling and reducing the landfilling of

⁸ <http://www.nlwa.gov.uk/docs/authority-meetings-and-reports/nlwa-2014-15-annual-report---for-website.pdf>

municipal waste as part of the proposals for delivering a ‘Circular Economy’⁹. WRAP defines the Circular Economy as *an alternative to a traditional linear economy (make, use, dispose) in which we keep resources in use for as long as possible, extract the maximum value from them whilst in use, then recover and regenerate products and materials at the end of each service life*¹⁰. These proposals include a 65% recycling target for LACW by 2030. If this becomes policy applicable to the UK, the North London Boroughs will need to revise the NLWP strategy which currently plans for 50% recycling by 2020 and maintaining this level until 2032.

Commercial and Industrial Waste

- 5.22 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 while 18% of this waste stream is sent to landfill and land recovery. A small proportion (6%) of C&I is sent for thermal treatment or other forms of management (7%). It should be noted that potential reliance on landfill rises to up to 34% with the addition of a further 17% of C&I waste with an unknown management route..
- 5.23 The Mayor’s Business Waste Strategy, “Making Business Sense of Waste” sets a target of 70% of C&I waste to be recycled 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) works with businesses to increase their recycling rates.
- 5.24 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.
- 5.25 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.

⁹ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Closing the loop - an EU action plan for the circular economy

¹⁰ <http://www.wrap.org.uk/content/wrap-and-circular-economy>

- 5.26 European Commission proposals released in December 2015¹¹ include increased recycling targets for packaging materials in the commercial and industrial sectors of 65% by 2025 and 75% by 2030. If this becomes policy, it is unlikely the North London Boroughs will need to revise the NLWP strategy which currently plans for 70% recycling of C&I waste by 2020 and 75% recycling by 2031.

Construction, Demolition and Excavation Waste

- 5.27 Local planning policies and development industry practice mean a lot of C&D material is managed on site and does not enter the waste stream. Of that which does, the largest proportion of C&D waste is managed via transfer (46%) and treatment (16%) facilities, with 38% sent directly to landfill. Recycling rates of C&D waste are high due to the nature and value of the material. Excavation materials are primarily disposed of directly to landfill (56%) with the remainder managed through transfer stations (28%) or sent for treatment (16%). The London Plan includes a target of 95% recycling of CD&E by 2020.
- 5.28 The recycling of construction and demolition waste is encouraged by an EU-wide mandatory target¹², but challenges on the ground still have to be addressed if waste management in this sector is to improve. For example, valuable materials are not always identified, collected separately, or adequately recovered. The European Commission will develop targeted guidelines for use on demolition sites for that purpose, including on the treatment of hazardous waste, and is promoting sorting systems for construction and demolition waste in the revised proposals on waste. It will help to spread best practices by developing voluntary recycling protocols based on the highest common standards for each waste stream. The Commission is also currently conducting a study to identify the obstacles to, and drivers for, the recycling of construction and demolition waste, and best practices in this area. If this becomes policy, it is unlikely to affect the NLWP strategy as the targets are within those already planned for.

Hazardous Waste

- 5.29 For hazardous waste 50% (31,794 tonnes) was managed at treatment facilities in 2014, of which the majority was exported for treatment outside of North London. The next most common method of management was recovery (22%), with a further 10% being managed at landfill. Of the total hazardous waste arisings, 62,707 tonnes (98%) was exported out of North London for management. It is not unusual for

¹¹ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Closing the loop - an EU action plan for the circular economy

¹² http://ec.europa.eu/environment/waste/construction_demolition.htm

hazardous waste to travel outside the area to specialist facilities which tend to have a wider catchment area.

- 5.30 There are a number of initiatives in place to ensure better implementation of EU waste legislation, including on hazardous waste. None of the circular economy proposals referred to in 5.21 announced by the European Commission in December 2015 will affect the NLWP strategy for hazardous waste.

Agricultural Waste

- 5.31 The majority of agricultural waste arisings are managed within the limited number of farm holdings within the plan area, with a very small amount managed offsite. 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)

- 5.32 The very small amount of Low Level Non-Nuclear Radioactive Waste (LLW) arising in North London, mainly from hospitals, is currently managed outside of the area in specialist facilities. Records of LLW in the sub-region indicate that 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 100m³.

Waste Water and Sewage Sludge

- 5.33 Waste Water Treatment Works in North London are operated by Thames Water. The main Thames Water Waste Water/sewage treatment facility in North London is Deephams Sewage Treatment Works (STW), which is the ninth largest in England. The site is to be retained and improved for waste water use and planning permission has been granted for an upgrade to the sewage sludge treatment stream. 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. Further details can be found in section 8.

Cross Boundary Movements (exports and imports)

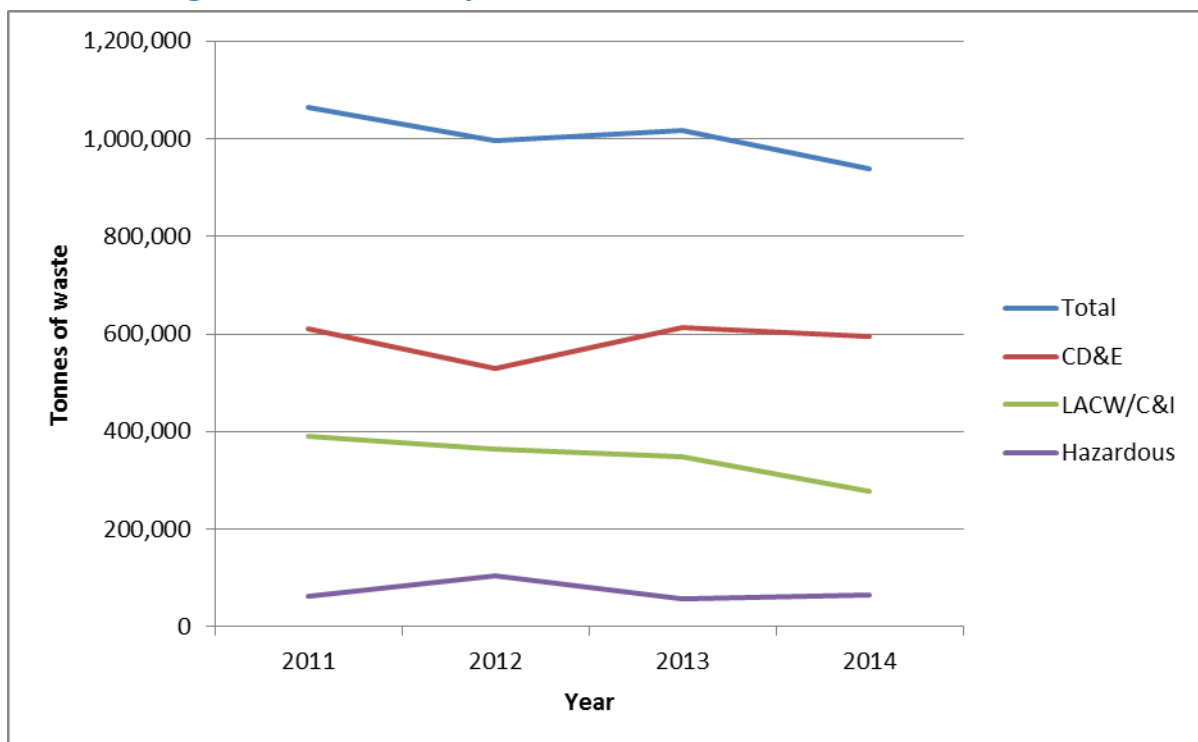
- 5.34 In 2014, 1,167,112 tonnes of waste was exported from North London. 54% of this went to landfill. Exports in the LACW/C&I category have been steadily declining in recent years. This is consistent with the waste strategies of the Mayor and the North London Waste Authority which aim to reduce the 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 overall. This pattern is shown in Table 4 and Figure 10 below.

Table 4.: Waste exported from North London 2011-2014

Type of waste	2011	2012	2013	2014
CD&E	610,864	530,025	611,902	595,203
LACW/C&I	390,226	362,950	347,206	278,050
Hazardous	62,473	103,884	58,216	64,193
Total	1,063,563	996,859	1,017,324	937,446

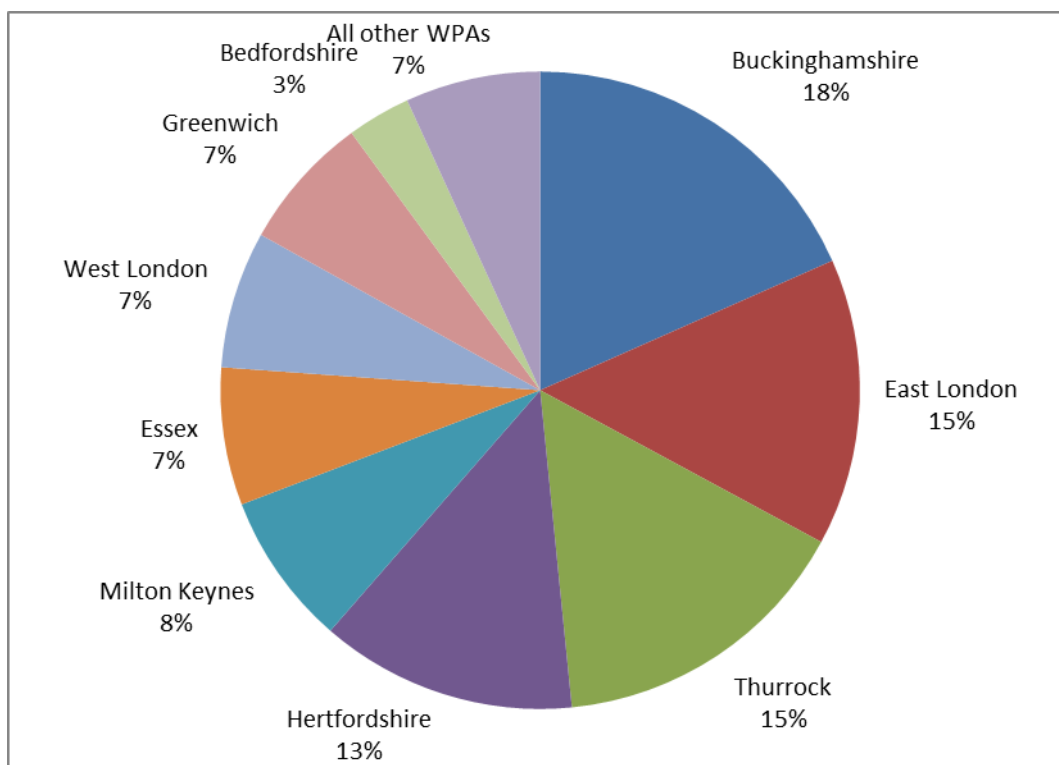
Figure 10: Waste exported from North London 2011-2014



Source: WDI 2011-2014

5.35 During 2010-14 waste exports from North London were deposited in more than 100 different waste planning authority areas but the majority (93%) went to nine main destinations. These are shown in the Figure 11 below:

Figure 11: Distributions of Waste Exports from North London



Source: WDI 2011-2014

- 5.36 On average 1.5 million tonnes of waste is imported to North London, making the area a net importer of waste when considered against the approximately 1.2 million tonnes exported as identified above. Most of the imported waste 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. The data study has identified that there is sufficient capacity for the recycling of LACW and C&I wastes throughout the plan period with some surplus capacity indicating an ability to manage more of this waste than North London produces. The area also has a strategically important Metal Recycling Site in Enfield which manages over 220,000 tonnes of metal a year from across London and surrounding areas.
- 5.37 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 of engagement has been on the above mentioned nine WPAs, the North London Boroughs are also continuing a dialogue on waste movements with all WPAs who have expressed a wish to do so. A Report on the duty to co-operate, issues identified and next stages accompanies this Plan and is summarised here.
- 5.38 Engagement to date has identified a particular constraint to the continuation of waste exports to landfill from North London relating to the scheduled closure of landfill sites during the plan period. Details can be found in the paper, *Exports to Landfill 2017-2032*, on the NLWP website (www.nlwp.net), though the operation of

some of these sites may be extended beyond their currently permitted end date. The boroughs will continue to monitor this information throughout the preparation of the NLWP, and after it is adopted as reflected in the monitoring framework in Chapter 10.

- 5.39 Nonetheless, as set out in the paper, capacity at potential alternative destinations for the amount of waste currently being exported to those sites earmarked for closure during the plan period has been identified. The paper shows that there are both alternative sites and adequate void space in London, South East and East of England to take North London's 'homeless' waste between 2017 and 2032.
- 5.40 Cooperation with those areas in receipt of North London's waste will continue in line with the requirements for the Duty to Co-operate, and where appropriate and possible, a Memorandum of Understanding (MoU) will set out working arrangements and agree the planning context for the movements of waste between the areas over the next 15 years. The MoU is also a mechanism to recognise the recipient authorities' strategic function in delivering the NLWP's plan for waste in line with national policy..
- 5.41 A further potential issue which could have implications for the continued export of waste has been identified with specific regard to hazardous waste, namely a lack of detailed data on where it ends up. This type of waste is managed in specialist facilities which have wide catchment areas and therefore may not be local to the source of the waste. North London has four waste facilities capable of handling hazardous waste, two of which are end of life vehicle sites handling around 400 tonnes per annum, with the other two being treatment facilities. The treatment facilities handle a small proportion of North London's hazardous waste (around 2% or 1,486 tonnes per annum in 2014) while the rest (62,706 tonnes 98%) is exported.
- 5.42 While the export of the majority of hazardous waste to the most appropriate specialist facilities is likely to continue, current data collection methods do not pinpoint the hazardous waste facilities in question. The boroughs will continue to engage with the Environment Agency and waste planning authorities in receipt of hazardous waste from North London, including seeking to identify any constraints to the continued export of this waste. Should any constraints come to light, such as anticipated closure of a facility, the boroughs will seek to identify potential new destinations with capacity for managing compensatory amounts. The North London Boroughs will pursue agreement on this matter with recipient waste planning authorities through a memorandum of understanding in line with the NLWP Duty to Co-operate Protocol (available at www.nlwp.net) which provides the framework for engagement with prescribed bodies in accordance with the statutory obligation.
- 5.43 In terms of plan provision, the work undertaken on identifying future locations for waste facilities across North London has assessed the potential to handle hazardous

waste. Of the 303 hectares of land identified as potentially suitable for the development of new waste management facilities during the plan period, 190 hectares are outside Flood Zone 3 and Source Protection Zone 1 and therefore possibly suitable for hazardous waste, subject to detailed assessment at planning application stage and notwithstanding issues around the scale of waste arisings required to make such facilities economically viable as set out in Chapter 9.

- 5.44 The North London Boroughs will continue to co-operate with relevant authorities on matters of strategic waste planning throughout the preparation of the NLWP and once the Plan is adopted. The Duty to Co-operate Protocol provides the framework for this with MoU being the preferred mechanism. For agreeing future cooperation, including the monitoring of the estimated exports set out in Table 7 of this Plan. A full report on the Duty to Co-operate, including issues identified and next stages accompanies this Plan and is available on the website

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 It follows that a key part of the development of the NLWP is to identify how much waste will be produced during the plan period, how this will be managed, what capacity is required and whether there is sufficient capacity already available. The NLWP must also consider how changes in the waste management behaviours, practices and technologies may influence this.
- 6.3 North London's waste management needs have been identified through the Waste Data Study. A Waste Data Study was prepared in July 2014 and updated in July 2015 to inform the Draft NLWP. A further update in 2016 accompanies the Proposed Submission Plan. The Data Study concludes that over the NLWP plan period there are capacity gaps for C&I, CD&E and Hazardous waste, and that North London will require additional facilities to meet these. In relation to the gap for Hazardous waste, the North London Boroughs will contribute to the planning for hazardous waste facilities at a regional level and through the identification of areas within North London that may be suitable for hazardous waste facilities. 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 accordance 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 explored reasonable alternatives leading to selection of the preferred strategy. An Options Appraisal Report (December 2014) was prepared which considered different scenarios around how much waste will be generated over the plan period (economic and population growth assumptions), how much waste can be managed within North London (capacity strategy, and how this waste should be managed (management strategy). The preferred option identified in the Options Appraisal was carried over to the Draft Plan (2015), alongside an outline of other options explored and, following consultation, has been taken forward as the 'chosen approach' in this Proposed Submission Plan. This section sets out the chosen 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: How much waste will be generated in North London up to 2032?

6.5 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 (March 2015), as well as those set nationally.

6.6 All the evidence and projections anticipate substantial population and economic growth in London over the next few decades. The Options Appraisal report concludes that the most appropriate strategy for the NLWP is the option closely aligned with the Greater London Authority's (GLA) modelling which has been independently tested through the London Plan Examination process.

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

6.7 The NLWP is required to plan for seven waste streams, in accordance with EU and national policy: local authority collected waste (LACW); commercial and Industrial (C&I) waste; construction, demolition and excavation (CD&E) waste, low level radioactive waste and, agricultural waste. In so doing, it must meet apportionment targets for LACW and C&I waste by 2026 as set out in the London Plan.

6.8 As mentioned in section 5, 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 LACW, C&I and CD&E waste streams to identify management capacity for in the NLWP. Hazardous waste is a sub category of all waste streams, and is also considered in the NLWP.

6.9 Net self-sufficiency for LACW, C&I and C&D waste was considered the most appropriate capacity strategy for the 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 (which differentiates it from total self sufficiency). All these waste streams can be managed at recycling/composting or recovery facilities which could be provided within North London. The NLWP plans for net self-sufficiency for LACW and C&I waste streams by 2026 in line with London Plan targets, and for C&D waste by the end of the plan period in 2032.

6.10 Some waste will still require disposal outside the area, for example, it is not possible to achieve net self-sufficiency for excavation waste as this waste stream is most appropriately disposed of at landfill and North London has no landfill sites. In order to identify options for future landfill the North London Boroughs are working closely with areas capable of providing landfill capacity for North London's waste over the plan period and can demonstrate that there are landfill sites with the potential to take North London's waste between 2017 and 2032. See Figure 12 for anticipated exports to landfill during the NLWP plan period.

Management: how waste will be managed within North London

6.11 The North London Boroughs have statutory duties to meet recycling and recovery targets and the NLWP will need to be ambitious in order to achieve European Union, national, regional and local targets. These targets are as follows:

Table 4: Recycling and Recovery Targets with 201/5 Baseline

Waste stream	Target	2014 baseline
LACW	50% recycling for LACW by 2020 with 40% energy recovery from 2015	33%
C&I	70% recycling by 2020, 75% recycling by 2031 with 15% energy recovery from 2020	66%
C&D	95% recycling by 2020	65%
Biodegradable or recyclable waste	Zero biodegradable or recyclable waste to landfill by 2026	Not known

6.12 Options were explored around different levels of recycling and recovery of waste arisings. Maximising recycling is considered to be the most appropriate choice of behaviour scenario as it aligns with European Union, national, regional and local targets and, based on current levels of recycling and recovery, is considered to be realistic and achievable. It also represents the option whereby comparatively more waste will be managed further up the waste hierarchy with more opportunity to divert waste away from landfill.

Chosen Approach

6.13 The chosen approach for the NLWP can be summarised as follows:

<p>Chosen Approach for planning for North London’s waste</p> <p>Population/Economic Growth in line with London Plan forecasts</p> <p>+ Maximising Recycling</p> <p>+ Net self-sufficiency for LACW and C&I by 2026 and C&D by 2032</p> <p>= Quantity of waste to be managed</p>

6.14 It is considered that this approach provides the most robust modelling scenario to project future capacity gaps, taking account of existing/planned capacity, and waste management needs. The results of the modelling work can be found in Appendix Y of the Data Study (2016) and summarised in Table 7: Amount of waste to be managed 2017-2032.

Meeting the Capacity Gap

6.15 Table 5 below sets out the capacity gap broken down in to 5 year periods over the NLWP plan period. The capacity gap is the difference between tonnage associated with existing and planned waste management capacity (see Table 3 – Chapter 5) and the quantity of waste to be managed over the plan period (see the chosen approach set out above). This method identifies whether there is adequate or surplus of capacity or a requirement for additional facilities. Table 5 sets out the capacity gaps for each management route. Negative figures indicate a capacity gap and therefore the type of management route for which capacity is sought over the plan period. The highlighted boxes denote where ‘surplus’ capacity exists.

Table 5: Capacity gaps throughout the Plan period –chosen option

	Capacity gap/ surplus (per annum)			
Management Route	2017	2022	2027	2032

Management Route	Capacity gap/ surplus (per annum)			
	2017	2022	2027	2032
Landfill (C+I and LACW)	-214,438	-132,592	-119,227	-108,417
Landfill (Hazardous)	-8,836	-8,836	-8,836	-8,836
Landfill (C+D)	-152,317	-22,536	-23,283	-24,055
Landfill (E)	-251,618	-259,961	-268,580	-277,485
Energy from waste	-45,405	-15,377	14,606	3,187
Energy from waste (Hazardous)	-171	-171	-171	-171
EfW (CI only)	-49,900	-109,542	-	-
Thermal Treatment (Hazardous - no energy recovery)	-928	-928	-928	-928
Recycling (C+I and LACW)	368,722	23,329	-17,014	-55,855
Recycling (C+D)	3,506	-144,806	-282,170	-301,179
Recycling (specialist material)	415,616	415,064	414,495	413,906
Recycling (Hazardous)	-18,819	-18,819	-18,819	-18,819
Composting	22,765	-12,890	-13,317	-13,759
Treatment plant	39,592	33,693	27,598	21,300
Treatment Plant (Hazardous)	-31,781	-31,781	-31,781	-31,781
Land recovery	-18,455	-18,765	-19,086	-19,417

Source: NLWP data study model 2016

6.16 Table 5 identifies that there is a capacity gap for landfill throughout the plan period. The NLWP seeks to reduce the levels of waste as far as practicable to reduce the level of waste exported for disposal to landfill. The table also identifies a need for both recycling and recovery for hazardous waste to reduce exports of this waste stream. With the ambitious recycling targets for C&D waste, there is an identified need early in the plan period and this continues throughout. For C&I there is a need for recovery early in the plan period, however the new ERF at Edmonton will accept C&I waste from 2026, and this need subsequently disappears. A gap for C&I recycling

also emerges towards the end of the plan period. A fuller explanation of requirements is set out in chapter 7.

6.17 The capacity gap figures in tonnage of waste have been converted to waste management land requirement using data from evidence gathered and evaluated on typical capacity and land take for each type of facility. The Data Study Update available on the website (www.nlwp.net) provides a fuller explanation. Table 6 below sets out the amount of land required within North London to meet the capacity gaps identified in Table 5 for the chosen approach of net self-sufficiency for LACW, C&I and C&D waste streams.

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				
	2017	2022	2027	2032	Total
Recovery (C&I)	2 ¹³ (2)				2 (2)
Recycling (C&I)				2	2
Recycling (C&D)	0	6	5	1	12
Recycling (Hazardous)	2				2
Recovery (Hazardous)	3				3
TOTAL land required in North London	7 (2)	6 (0)	5 (0)	3 (0)	21 (2)

6.18 Although Table 6 identifies a need for recovery facilities for C&I waste, this need is immediate and declines over the plan period to when the Edmonton Energy Recovery Facility is completed. For this immediate need to be met facilities would need to be in place now, or at least in planning, which is not the case. There is a facility permitted in Enfield which was known as the Kedco Facility however, this has not been built. Therefore it is highly probable that this need will not be met and that C&I waste requiring recovery will continue to be exported in the short term. The

¹³ The existing Edmonton EfW only accepts LACW, however the replacement facility may be able to take C&I. Should this be the case, the Edmonton facility would assist in meeting Recovery requirements during the plan period. Although a short term need is identified, it is unlikely this would be built within a time frame that would meet this need.

main need identified is for the provision of construction and demolition recycling facilities in order that the 95% recycling target for this waste stream can be achieved. There is a requirement in the last 3 years for additional recycling facility to manage the increasing levels of recycled waste expected from the C&I waste stream reflecting the 75% recycling target.

- 6.19 A capacity gap equivalent to five hectares of land has been identified for meeting North London’s hazardous waste management need over the plan period. While the North London Boroughs support the provision of hazardous waste facilities in appropriate locations, it is acknowledged that these facilities generally operate for a wider-than-local catchment area due to their specialist nature. The Boroughs will therefore work with the GLA and other boroughs across London to identify and meet a regional need.

7. Provision for North London’s Waste to 2032

- 7.1 The information about existing capacity and facilities and the chosen approach outlined in Chapter 6 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 approach set out below (‘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 are being planned for. While some waste will continue to be exported to types of facilities not existing or feasible to accommodate in North London, there is a surplus of provision for some management routes (shown in Table 5) and therefore an equivalent quantity of waste from outside of the area can be managed within North London leading to net self-sufficiency.
- 7.2 Table 7 sets out how net self-sufficiency for LACW, C&I and C&D waste will be achieved over the plan period. The table shows the estimated amount of waste generated in North London, including the quantity of waste to be managed within the area and how much waste will be exported to landfill. Further details on waste exports for disposal to landfill can be found in Figure 12 below. Appendix Y in the Data Study includes a more detailed breakdown of the estimated amount of waste arising for each waste stream and how it will be managed (recycling/composting, recovery or disposal). Table 7 and Appendix Y will be used as monitoring benchmarks.

Table 7: Amount of waste to be managed 2017-2032

Waste Stream	2017	2022	2027	2032
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	(tonnes)	(tonnes)	(tonnes)	(tonnes)
Estimated Waste arising	2,773,054	2,880,209	2,952,840	3,028,636
LACW	940,781	989,619	1,002,001	1,015,548
C&I	791,809	818,064	845,186	873,210
C&D	521,109	538,386	556,237	574,680
Hazardous	64,193	64,193	64,193	64,193
Target for net self-sufficiency (waste to be managed in North London)	2,317,892	2,410,262	2,467,617	2,527,631
Excavation	445,939	460,724	476,000	491,782
Agricultural	9,223	9,223	9,223	9,223
Planned exports to landfill	627,205	423,921	419,922	418,789
Total	2,773,054	2,880,209	2,952,840	3,028,636

Provision for North London's Waste to 2032

The chosen approach to future waste management in North London is effectively to reduce waste exports by identifying land for facilities 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 NLWP plans to move waste up the waste hierarchy by diverting as much waste as possible away from disposal to landfill by identifying land suitable for recycling and recovery facilities.

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 identifies sufficient land to manage the equivalent of all LACW and C&I waste arising in North London by 2026.

Recycling

The NLWA is seeking to achieve a household waste recycling target of 50% by 2020 consistent with the targets included within the North London Joint Waste Strategy. The Authority and partner boroughs will continue to seek to maximise recycling levels for LACW. Until 2025 there is sufficient capacity for recycling for both LACW and C&I waste streams. As many existing facilities can manage both waste streams, the need for recycling is combined. As recycling rates increase, this capacity becomes exhausted towards the end of the plan period where a gap of nearly 56,000 tonnes appears.

In addition to recycling, the existing composting facility at Edmonton will be displaced due to the development of the new Energy Recovery Facility. The NLWA are not intending to build a replacement facility to meet this requirement. Current contracts exist to export this waste outside the plan area.

Recovery

Most LACW is managed at the Edmonton EcoPark facility which has an existing 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 replaced in 2025. The North London Waste Authority (NLWA) is pursuing a Development Consent Order (DCO) for a new Energy Recovery Facility (ERF) with capacity of around 700,000 tonnes per annum to deal with all the residual waste under the control of the Authority from 2025 until at least 2050. The planning framework for this site includes the Edmonton EcoPark Supplementary Planning Document and emerging Central Leaside Area Action Plan.

As the existing EfW facility at Edmonton does not currently treat C&I waste, there is an immediate capacity gap for recovery of C&I waste amounting to 2ha of land as identified in Table 6. However, as no such facilities are currently in the pipeline, it is likely the waste will continue to be exported in the short to medium term until 2025. After this time, recovery of C&I waste will be met by the new Edmonton ERF to the end of the plan period.

Transfer

NLWA manage three waste transfer stations in North London namely the Hendon Rail Transfer Station (Barnet), Edmonton Ecopark Transfer Station (Enfield) and the Hornsey

Street Transfer Station (Islington). 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 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 and recycling levels increase.

The North London Boroughs have established that there are landfill sites in London, South East and East of England able to take North London's waste between 2017 and 2032.

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 land to manage the equivalent of all Construction and Demolition (C&D) waste arising in North London by 2032, 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. Each Borough Local Plan has a sustainable design and construction policy in place which seeks to minimise waste generated during the design and construction of development and re-use or recycling of materials on-site where possible.

North London has a number of transfer facilities which also recycle CD&E waste but a large quantity is still exported to landfill. Recycling opportunities are likely to be mainly for C&D wastes although around 45% of excavation waste is also recycled within North London, with the remainder being disposed of directly to landfill. Factoring the diversion of C&D waste away from landfill, the Data Study has identified a capacity gap of 42,000 tonnes per annum by 2017, rising incrementally over the three five yearly intervals to 2032 to around 301,000

tonnes per annum . Provision will be needed throughout the plan period.

A total of 12 hectares of land will be required to facilitate this provision as identified in Table 6. Opportunities to re-use CD&E waste locally will be supported, though this cannot be predicted with any certainty. Policy 9 'Inert Waste' seeks to ensure that any planning application for the recycling and reuse of inert waste for all types of development demonstrates that viable opportunities to minimise construction and demolition waste disposal will be taken, making use of existing industry codes of practice and protocols, site waste management plans and relevant permits and exemptions issued by the Environment Agency.

Landfill

North London has no landfill sites and depends on capacity outside the plan area. 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. It is anticipated that C&D waste exports to landfill will reduce over the plan period while excavation waste exports will increase in line with growth.

The North London Boroughs, working with waste planning authorities who receive CD&E waste from North London, have identified constraints to the export of this waste and have established that there are both alternative landfill sites and adequate void space in London, South East and East of England to take North London's waste between 2017 and 2032.

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 and depend on wide catchment areas for their economic feasibility, and may not be local to the source of the waste. Planning for hazardous waste is a strategic issue (regionally and arguably nationally rather than sub-regional) and it is not anticipated that land for facilities would be identified to meet the requirements of North London alone, though the areas identified in this plan have been assessed for their potential suitability for such facilities.

Recycling and Recovery

North London has two hazardous waste treatment facilities with a small combined capacity of around 7,600 tonnes per annum and two more for end of life vehicles handling around 400 tonnes per annum between them,. It is denoted in the sites and area profiles in Appendix 2 of the plan when they have been assessed as not suitable for hazardous waste

recycling and recovery facilities.

There is a capacity gap for the recovery of around 32,000 tonnes per annum and recycling of around 19,000 tonnes per annum, requiring an estimated 5ha of land. The North London Boroughs support the provision of such facilities in appropriate locations and will work with the GLA and other Boroughs across London to meet this need. Any applications for hazardous waste facilities in North London that do come forward will be considered on a case by case basis. However, in the short term it is likely that hazardous waste will continue to be exported to the most appropriate specialist facilities.

Landfill

The need for export to landfill of around 8,000 tonnes per annum, is expected to continue due to inability of the area for provide this type of facility.

The North London Boroughs will continue to work with waste planning authorities who receive hazardous waste from North London to identify constraints to the continued export of this waste and identify potential new destinations if necessary.

Agricultural Waste

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

Low Level Radioactive Waste (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

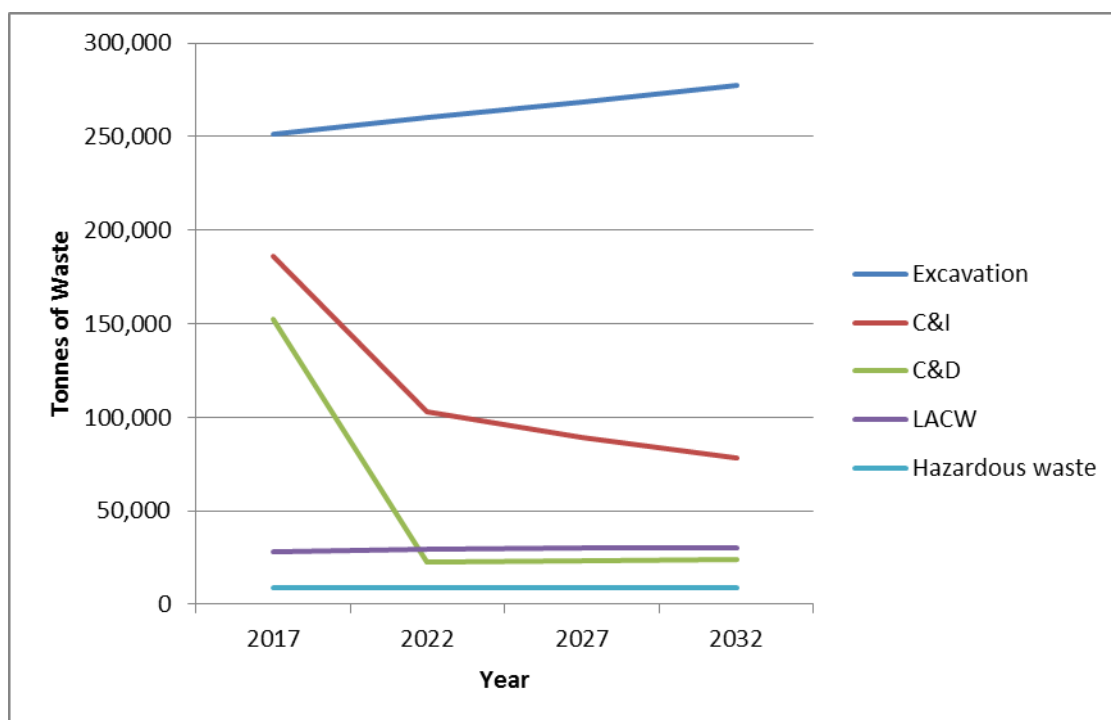
The main Thames Water sewage treatment facility in North London is Deephams Sewage Treatment Works (STW), operated by Thames Water. Work to upgrade this facility is due to be completed by March 2017. Thames Water anticipates this will provide sufficient effluent treatment capacity to meet its needs during 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 its needs during the plan period. It is therefore not necessary to identify additional land for this waste stream in the NLWP.

Exports to landfill

7.3 The chosen approach to future waste management in North London means that the NLWP plans to meet all recycling and recovery capacity required to achieve net self-sufficiency for LACW, C&I, C&D and hazardous waste within North London. Due to the nature of the plan area, local requirements for landfill of all waste streams cannot be met within North London and continued export to landfill outside the plan areas will be required, however this anticipated need reduces in direct relation to increased levels of recycling and recovery facilities for which are anticipated to be accommodated in North London.

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

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



Source: NLWP Data Study (2016)

7.5 The North London Boroughs have estimated and consulted on future exports to landfill for each of the main recipients of North London's waste. This is set out in the background paper *Exports to Landfill 2017-2032*.

7.6 A number of facilities in receipt of the Boroughs' waste sent for landfill are due to close during the NLWP plan period. The amount of waste affected by these closures has been identified. The Boroughs have established that there is both alternative sites and adequate void space in London, South East and East of England to take North London's estimated waste exports between 2017 and 2032.

- 7.7 The Boroughs have prepared a Memorandum of Understanding (MoU) for each of the main recipients of North London's waste to landfill which set out working arrangements and the planning context for the movements of waste between each area over the next 15 years.
- 7.8 Mechanisms for monitoring waste movements after the NLWP is adopted will be set out in memoranda of understanding and in Chapter 10 of this Plan.

8. Sites and Areas

Context

- 7.1. 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.
- 7.2. 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.
- 7.3. 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 is in principle suitable for waste use but where land is not specifically 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".
- 7.4. Allocating both sites and areas to meet the identified capacity gaps offers considerable benefits. Allocating sites will provide certainty to the waste industry that these are suitable locations for future waste development in North London and will help the North London boroughs meet the London Plan apportionments – 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.

- 7.5. Identifying areas within which waste uses would be broadly acceptable is also required to ensure the NLWP can meet the aim of net self-sufficiency for LACW, C&I and C&D waste, and 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

- 7.6. 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

- 7.7. 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.
- 7.8. 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 '*energetik*.'
- 7.9. The Authority's proposed DCO application allows for the loss of the composting plant at the Edmonton EcoPark site in 2020 to make way for the new ERF facility to

be built whilst maintaining the current EfW operation. It is also proposed to include a Resource Recovery Facility (RRF) including a new Reuse and Recycling Centre (RRC), a relocated transfer hall and a bulky waste/fuel preparation facility on the site as part of the DCO application.

- 7.10. Once the new facility has been developed, the plan is for the existing EfW facility to be demolished meaning that the associated parcel of land will continue to be safeguarded for future waste use, and would become 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 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

- 7.11. Deephams Sewage Treatment Works is a waste water treatment facility in Edmonton. The works serves a large area of north east London, both inside and outside the M25 corridor. The Environment Agency has issued a significantly tighter environmental permit in respect of sewage treatment standards 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 20th February 2015. Work has started and is due to be completed in March 2017.
- 7.12. 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

- 7.13. 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

- 7.14. 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, the Local Plan and, once adopted, the NLWP. 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

- 7.15. 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 were 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 (Methodology)

- 7.16. 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 sites forward for consideration.
 - iii. Land availability search – this was an initial search into the land available in North London that may be suitable for the development of waste management infrastructure. At this stage, all available sites and areas were included in the process in order that the site assessment process for the NLWP could then be applied. The purpose of this work was to identify a ‘long’ list of potential sites that should be subject to further evaluation to identify

those with the potential for future waste use and which should be taken forward for further consideration.

- iv. Desk based site and area assessment – Following compilation of the ‘long’ list of sites, the information was then assessed using GIS to help refine the list of sites. 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 8 below. The absolute criteria were applied first to determine if the identified constraints affected part of the proposed sites and areas, resulting in their removal. The remaining sites and areas were then subject to the screening criteria. The aim of using the absolute criteria was to ensure that those sites/areas which are wholly unsuitable are excluded from further consideration and to identify those which may be suitable.
- v. Site visits were undertaken in August and October 2014 to check and refine information from the desk based assessment and make a visual assessment of the characteristics that could impact on the suitability for waste management facilities and relationship with adjoining development. The information was used to complete the criteria-based assessment to determine the suitability of the sites/areas for future waste development as well as evaluate the potential facility types.
- vi. Areas identified as suitable for future waste management facilities were subject to an assessment was undertaken to calculate the level of capacity they could reasonably be expected to provide. Firstly the proportion of North London’s industrial land in waste use was established. This showed the ability of waste facilities to compete with other land uses in these areas was good and that waste is a growing sector in contrast to declining industries such as manufacturing. Secondly, a review of the vacancy rates 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 Appraisal¹⁴ and Habitats Regulation Assessment¹⁵ 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 views on the inclusion of their land as a waste site allocation. The findings of this work have further refined the list of sites and further information can be found in the Sites and Areas Report.
- ix. Sequential test – any sites 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.

7.17. The assessment criteria applied to all sites and areas is listed in Table 8 below. The criteria have been used in assessing sites and areas during both the desk based assessment and site visits.

Table 8: Sites and Areas Assessment Criteria

Absolute Criteria	Screening Criteria
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¹⁴ 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.

¹⁵ HRA is a requirement of Europe that all plans are assessed against their potential impact of natura 2000 sites.

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

7.18. The sites and areas identified as a result of the methodology set out above were consulted on as part of the Draft Plan.

7.19. In preparing the Proposed Submission version of the NLWP, and deciding which sites and areas to take forward, the North London Boroughs took into account a number of factors including national and regional policy, the aims of the NLWP and consultation responses on the Draft Plan. Further work was undertaken to gather and assess any additional information on the proposed sites and areas received during the consultation or as a result of new data being published.

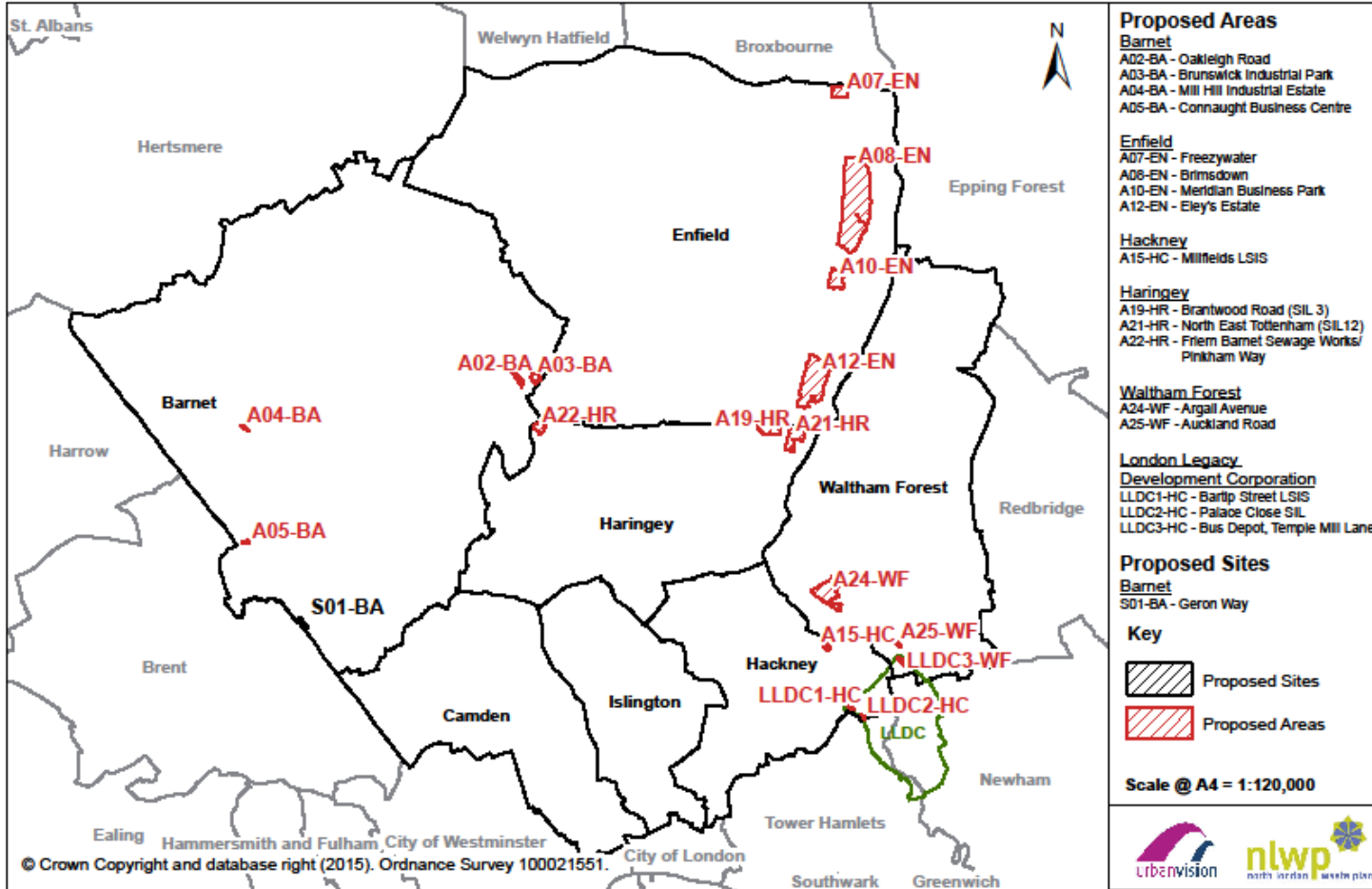
7.20. As a result of this work, it was decided by the Boroughs that there were sufficient reasons to reassess the approach to sites and areas. The revised approach is to focus on existing, well-established industrial land, and areas which performed well

against the assessment criteria. An opportunity was also identified to reduce the number of sites/areas identified in the Draft Plan as suitable for waste use, while maintaining flexibility and aiming for a wider geographical spread of land in order to maximise the opportunities for waste to be managed as near to its source as possible.

- 7.21. The North London Boroughs developed a range of reasonable options for taking forward sites and areas in the Proposed Submission version of the plan. The preferred option was to take forward land designated as industrial land and high-performing Band B sites/areas, while achieving a better geographical spread by reducing the number of sites identified in Enfield. This focus on industrial land and high-performing areas will help to mitigate the potential loss of land suitable for waste facilities. It also helps to locate waste facilities away from residential properties, as far as this is possible in an urban area like North London. Further details are set out in *Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP* (July 2016).
- 7.22. The new sites/areas, shown in Figure 13 (see also Schedules 2 and 3 in Chapter 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 Framework 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.

Figure 13: Location of proposed new sites and areas

North London Waste Plan - Proposed Sites and Areas



9 Policies

- 9.1 The policies set out in this chapter will form part of each Borough's 'development plan') which includes the Mayor's London Plan and individual borough Local Plans (see Figure 1). All planning applications for waste uses will be assessed against the following NLWP policies and other policies in the development plan and any associate Supplementary Documents (SPD)/guidance. Any proposals for waste development will be expected to take account of the full suite of policies and guidance. The policies have been developed with reference to regional and local policies as well as national policy and guidance, in particular the National Planning Policy Framework (NPPF), National Planning Policy for Waste (NPPW) and National Planning Practice Guidance (NPPG).
- 9.2 The NLWP policies will help deliver the NLWP's aim and objectives (section 2 & 3), spatial strategy (section 4) and the Provision for North London's Waste to 2032 (section 7). 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: Existing waste management sites
 - Policy 2: Site allocations
 - Policy 3: Locations for new waste management facilities
 - Policy 4: Windfall 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: Existing waste management sites

Policy 1: Existing waste management sites

All existing waste management sites identified in *Schedule 1: Existing safeguarded waste sites in North London* and in *Schedule 2 Site Allocations* are safeguarded for waste use.

Expansion or intensification of operations at existing waste facilities will be

supported where the proposal is in line with relevant aims and policies in the North London Waste Plan, the London Plan, Local Plans and related guidance.

Applications for non-waste uses on safeguarded waste 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 locally on a suitable replacement site, which normally 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 and is able to expand where appropriate. It applies to sites with existing operational waste facilities, waste facilities with or that receive planning permission not yet implemented, the site/(s) allocated for waste management use in this Plan, any other sites developed with waste facilities throughout the plan period.
- 9.5 *Schedule 1: Existing safeguarded waste sites in North London* is in Appendix 1. *Schedule 2: Site Allocations* is under policy 2 below. The London Plan requires boroughs to protect their existing waste capacity and each North London Borough is safeguarding this land through their Local Plan and Policies Map. The contribution currently made by these facilities, and that which they could make in the future, is taken into account in the estimation of how much additional waste management capacity is needed throughout the plan period so it is important to protect these existing facilities. If existing facilities were lost and the capacity not replaced elsewhere, this would result in additional waste management sites and facilities being required.
- 9.6 Planning applications for expansion of existing waste facilities will be supported where they are in alignment with policies in this plan and in Borough plans.
- 9.7 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. However, it may not be necessary for replacement sites to be on

a 'like for like' basis, for example, a new site with a larger capacity might replace a number of sites with individually smaller, but combined equivalent, capacity. .

- 9.8 Compensatory provision should be provided locally. The area of search for a replacement site should be within the same borough from which it is displaced in the first instance or failing that elsewhere in North London. Adequate evidence of compensatory provision will be required to the satisfaction of the local planning authority before planning permission for redevelopment is granted.
- 9.9 Any sites that come forward and receive permission for waste facilities which are implemented in the lifetime of the NLWP will be regarded as existing waste sites in North London and safeguarded under the provisions of this Policy (1).
- 9.10 Policy 1 also seeks to protect existing and allocated waste sites, which includes those identified in Schedules 1 and 2 respectively , from the influence of an adjacent incompatible use prejudicing the continuation or development of 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.

Policies 2 and 3: Site Allocations and Locations for new waste management facilities

- 9.11 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.
- 9.12 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 identified to accommodate built waste management facilities to deal with these identified capacity gaps for North London.

- 9.13 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 is 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.
- 9.14 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 identified Areas in Policy 3.
- 9.15 The sites and areas have been identified following a search and assessment process, the results of which are summarised in the site profiles 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.
- 9.16 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 9: 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 the second criteria of Policies 2 and 3 which requires development proposals to manage waste as far up the waste hierarchy as practicable.

9.17 The NLWP recognises that currently emerging or unknown waste management technologies, not listed in Table 9 'Key to Waste Facility Types', may be proposed on allocated sites and within identified areas 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 9: 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

9.18 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”¹⁶. 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 gains¹⁷. 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.

9.19 A full assessment of the suitability of the site/area for a facility type should be prepared by the developer to inform any development application for waste use. This will allow for a more detailed analysis and consideration of potential impacts associated with a specific proposal at the planning application stage.

Policy 2: Site allocations

The Site identified in *Schedule 2: NLWP Site Allocations* is allocated for waste use.

¹⁶ [WRAP definition](#)

¹⁷ Further information on the circular economy is available from sources such as the [Ellen MacArthur Foundation](#)

Applications for waste management development on the site identified in *Schedule 2: NLWP Site Allocations* will be permitted subject to detailed assessment against other policies in the North London Waste Plan, The London Plan and Local Plans and related guidance.

Development proposals will need to manage waste as far up the waste hierarchy as practicable.

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

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

Table 10: Schedule 2 Site Allocations

Site Ref	Site Name	Size (ha)	Borough	Waste Facility Type				
				A	B	C	D	E
S01-BA	Replacement site for BXC	TBC	Barnet	X	X	X	X	X

9.20 The site identified in *Schedule 2: NLWP Site Allocations* will be safeguarded for waste development to provide certainty to the waste industry that it is suitable in principle 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. Any development application and associated material considerations will need to be fully appraised at the planning application stage.

9.21 In North London the most likely options for waste management will be recycling and recovery. The test of whether the proposed management is acceptable in terms of the waste hierarchy will be based on the type of waste and the treatment proposed and demand.

Policy 3: Locations for new waste management facilities

Areas listed in *Schedule 3: New Locations for waste management* and *Schedule 4: Areas identified in LLDC Local Plan* are identified as suitable for built waste management facilities.

Applications for waste management development will be permitted on suitable land within the areas identified in Schedule 3 subject to other policies in the North London Waste Plan, the London Plan and Local Plans, and related guidance.

Development proposals will need to manage waste as far up the waste hierarchy as practicable.

Applications for waste management development within the 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 A, Band F

Table 7: Schedule 3 New Locations for waste management

Area ref	Area Name	Area (ha)	Borough	Waste Facility Type				
				A	B	C	D	E
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
A07-EN	Freezywater	10.7	Enfield	X	X		X	X
A08-EN	Brimmsdown	134.4	Enfield	X	X	X	X	X
A10-EN	Meridian Business Park	14.9	Enfield	X	X	X	X	X
A12-EN	Eley's Estate	61.6	Enfield	X	X	X	X	X
A15-HC	Millfields LSIS	2.1	Hackney			X		
A17-HC	Mare Street	0.46	Hackney	X				
A19-HR	Brantwood Road	16.9	Haringey	X			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
A24-WF	Argall Avenue	27.9	Waltham Forest	X	X			X
A25-EF	Auckland Road	1.26	Waltham Forest	X				X

Table 8: Schedule 4 Areas identified in LLDC Local Plan

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
LLDC3-WF	Temple Mill Lane	2.1	Waltham Forest	X	X			X

9.22 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 identified 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.

- 9.23 In North London the most likely options for waste management will be recycling and recovery. The test of whether the proposed management is acceptable in terms of the waste hierarchy will be based on the type of waste and the treatment proposed and demand.
- 9.24 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 4 sets out separately those areas identified in the LLDC Local Plan as being potentially suitable for built waste management facilities.

Policy 4: Windfall Sites

Policy 4: Windfall Sites

Applications for waste development on windfall sites outside of the sites and areas identified in Schedules 1-3 will be permitted provided 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 and the assessment criteria set out within Policy 6
- d) demonstrate they can manage waste as far up the waste hierarchy as practicable

This policy helps meet strategic objectives SO2 and SO3

This policy contributes towards spatial strategy components B and G

- 9.25 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. Windfall sites refer to locations which are not identified in Schedules 1-4 of this Plan.
- 9.26 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.

- 9.27 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 identified sites/areas do not meet the technical requirements of a proposed waste management facility, for example, the identified locations might be too small for the proposed development or the facility may need to be located near a specific waste producer or user of heat.
- 9.28 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 a site not identified in this Plan.
- 9.29 Proposals for waste development on windfall sites would be expected to be in line with the London Plan, the NLWP, and Local Plans. Proposals for waste management facilities on windfall 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.
- 9.30 In North London the most likely options for waste management will be recycling and recovery. The test of whether the proposed management is acceptable in terms of the waste hierarchy will be based on the type of waste and the treatment proposed and demand.

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 proposals:
- 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

- 9.31 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 eight are the responsibility of the North London Waste Authority (NLWA). They are safeguarded for waste use under Policy 1. The NLWA has identified areas of deficiency in coverage in parts of Barnet and Enfield and is seeking to address this by providing new or replacement sites so that 95% of residents live within two miles (measured as a straight line) of a facility¹⁸ - see Figure 7 in Section 4. The NLWA is also proposing a new RRC on the Edmonton EcoPark site as part of its current Development Consent Order (DCO) application on the site. The Spatial Framework 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.
- 9.32 Re-use & Recycling Centres should be located where they can provide appropriate access for members of the public and for contractors and their vehicles. They are best sited on former waste sites or in areas of industrial or employment land and need to be of a sufficient size for the range and quantity of materials likely to be received. There may be scope to provide localised recycling centres as part of major new development.

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

¹⁸ Household Waste Recycling Centre Policy, North London Waste Authority (June 2010)
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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 amenity of local residents is protected
- b) the facility will be enclosed unless justification can be provided by the developer as to why that is not necessary
- 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 any 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 appropriate high quality design;
- f) there is no significant adverse impact on the historic environment (heritage assets and their settings, and undesignated remains within Archaeological Priority Areas), open spaces or land in recreational use or landscape character of the area including the Lee Valley Regional Park
- 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) development makes the fullest possible contribution to climate change adaptation and mitigation;
- j) the development has no adverse effect on the integrity of an area designated under the Habitats Directive or no significant adverse effect on local biodiversity or water quality;
- k) there will be no significant impact on the quality of underlying soils, surface or groundwater;
- l) the development has no adverse impact on Flood Risk on or off site and aims to reduce risk where possible;
- m) holds or has applied for appropriate permits from the Environment Agency
- n) there is no adverse impact on health
- o) That consideration has been given to the cumulative impact of any proposed waste management development upon amenity, the economy, the natural and the built environment either in relation to the collective effect of different impacts of an individual proposal, or in relation to the effects of a number of waste developments occurring concurrently or successively.

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

This policy contributes towards spatial strategy component E

- 9.33 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. Amenity is defined as any element providing positive attribute to the local area and its residents and can include such issues as increased noise disturbance, light impacts including increased light or reduced light or sunlight, reduced privacy, loss of outlook and reduced visual amenity. Applicants will need to demonstrate that appropriate measures have been taken to minimise any potential impacts from new waste development and the operating hours of waste facilities may be limited to protect amenity.
- 9.34 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 to problems associated with open air facilities. It is current best practice that the operations are carried out within a covered building enclosed on all vertical sides with access and egress points covered by fast acting doors which default closed in order to minimise local public health and environmental impact. Such enclosed facilities are similar in appearance to modern industrial shed developments such as factories or logistics facilities 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 except in exceptional circumstances. There are types of waste management or storage for specific waste streams or waste types that may not need to or should not be enclosed but any activity likely to cause dust should be carried out within a building or enclosure. Enclosing waste management facilities not only results in less dust and particulate pollution but will also reduce the risk of pollution caused from other amenity issues such as noise, pests and odour. Noise, vibration, dust, litter, vermin, odours, air and water-borne contaminants, other emissions and their potential health impacts have been a major concern raised through public consultation. However, well sited, and well managed facilities should not cause harm or disturbance. Details of controls for emissions (including bio aerosols) from the site need to be supplied with the application. Planning conditions and section 106 agreements will be used to secure measures to address 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.
- 9.35 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.

- 9.36 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 facilities¹⁹. 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.
- 9.37 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.
- 9.38 Where sites include, or are likely to have an impact on the setting of a heritage asset both designated (Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, Registered Historic Parks and Gardens and Battlefields) and undesignated, including archaeology, it should be demonstrated that the development will conserve the asset. Where the site has potential to include assets with archaeological interest, such as if it is in an archaeological area identified in a Borough Local Plan or may affect a site recorded on the Greater London Historic Environment Record, an appropriate desk base assessment and where necessary, a field evaluation, is required to accompany the planning application. Where such an assessment and evaluation confirms significant archaeological interest then appropriate mitigation by design or investigation is also required.
- 9.39 A large part of the Lee Valley Regional Park (1483 ha) falls within four of the North London Boroughs involved in the Plan; Waltham Forest, Haringey, Enfield and Hackney. New development should contribute to the protection, enhancement and development of the Regional Park as a world class visitor destination and the wider public enjoyment of its leisure, nature conservation, recreational and sporting

¹⁹ Designing waste facilities – a guide to modern design in waste, Defra & CABE, 2008

resources. The Lee Valley is a significant resource for North London and developments should not have an adverse effect on the open space and character of the area and should aim to contribute to its enhancement where appropriate.

- 9.40 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 prioritise non-road forms of transport if at all possible and to set out their assessment in a Transport Assessment detailing transport issues to be submitted with any planning applications for waste facilities (see below). In North London there exists considerable potential for sustainable transport of waste as part of the waste management process. There are a number of railway lines and navigable waterways in North London including the Regents Canal and the Lee Navigation. It is existing practice to transport waste by train and pilot projects have taken place to transport waste by water. Developers are required to demonstrate that they have considered the potential to use water and rail to transport waste before reliance on transport of waste by road. Where the site lies adjacent to a wharf or waterway, capable of transporting waste, developers need to demonstrate that consideration has been given to the provision and/or enhancement of wharf facilities;
- 9.41 Applicants will need to submit a Transport Assessment in line with the relevant borough Local Plan policy and the London Plan. The Transport for London Best Practice Guide contains advice on preparing Transport Assessments when they are required to be submitted with planning applications for major developments in London. Consideration should be given to access arrangements, safety and health hazards for other road users, the capacity of local and strategic road networks, impacts on existing highway conditions in terms of traffic congestion and parking, on-site vehicle manoeuvring, parking and loading/unloading areas, and queuing of vehicles.
- 9.42 The development of Servicing and Delivery Plans and Construction Logistic Plans (CLP) will be encouraged for all waste developments. Such Plans ensure that developments provide for safe and legal delivery and collection, construction and servicing including minimising the risk of collision with vulnerable road users such as cyclists and pedestrians. Consideration should be given to the use of Direct Vision Lorries for all waste vehicles and the use of freight operators who can demonstrate their commitment to TfLs Freight Operator Recognition Scheme (FORS) or similar.
- 9.43 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 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. Information supplied should enable the Council in question to assess the proposal against relevant planning policies by clearly setting out how the application complies with sustainable design and construction policies and guidance including measurable outputs where appropriate. Production of Site Waste Management Plans will also be required prior to the commencement of construction of the development.

- 9.44 Waste developments should be designed to protect and enhance local biodiversity. Development that would have an adverse effect on any area designated under the Habitats Directive will not be permitted. Assessments undertaken for the plan have identified sites of European Community importance within and nearby the plan area. Sites at least partially within the plan boundary are the Lee Valley Special Protection Area (SPA) and RAMSAR site and part of Epping Forest Special Area for Conservation (SAC). Additional sites at least partially within 10 km of the plan area boundary are Wormley-Hoddesdon Park Woods SAC and Wimbledon Common SAC3. Developers need to be able to demonstrate that their proposals will not either alone or in combination, have an adverse effect on the integrity of any European site. In addition there are six Sites of Special Scientific Interest and 20 Local Nature Reserves as well as sites of importance to nature conservation (SINC). Developers should take note of existing Biodiversity Action Plans, protect existing features and promote enhancement for example through the use of green walls where acoustic barriers are required.
- 9.45 Where a development site is adjacent to a river the Environment Agency has advised that a setback of a minimum of 8 metres from the top of the bank to be incorporated into any redevelopment proposals. Consistent with this advice, setting back waste management development (not including wharf development) from watercourses and providing an undeveloped buffer zone free from built structures will be important for maintaining access to the river, to allow the landowner access for routine maintenance activities and for the Environment Agency to carry out Flood Defence duties. Maintaining a sufficient wildlife and riverside corridor is also important for minimising the potential adverse impacts to the water quality and riverine habitats. This will provide opportunities for flood risk management in line with the Environment Agency Catchment Flood Management Plans. Opportunities for river restoration through the redevelopment of sites should also be encouraged to ensure compliance with requirements under the Water Framework Directive and the Thames River Basin Management Plan.
- 9.46 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.

- 9.47 Higher risk waste uses are less likely to be acceptable in source protection zone 1. Early liaison with the Environment Agency is encouraged.
- 9.48 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.
- 9.49 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. Development proposals will be required to show that flood risk would not be increased as part of the scheme and, where possible, will be reduced overall through the use of Sustainable Drainage Systems (SuDS) and other techniques. Any proposed development should be reviewed by the Environment Agency at an early stage to discuss the reduction of flood risk on the site.
- 9.50 Developers of waste facilities should at the time they submit their planning application be engaged with the Environment Agency and hold or be in the process of applying for appropriate permits from the Environment Agency as the contemporaneous consideration of planning and environmental permit enables the application to be considered in the round.
- 9.51 Developers of waste facilities will need to fully identify the health implications of the development and plan the most appropriate scheme to protect the surrounding uses and community. Any proposed waste development which is required to have an Environmental Impact Assessment will also require a Health Impact Assessment.

- 9.52 Paragraph 5 of the National Planning Policy for Waste (NPPW) requires consideration be given to:

“The cumulative effect of existing and proposed waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential”

- 9.53 Cumulative impacts relate to the way in which different impacts can affect a particular environmental resource or location incrementally, for example, combined noise, dust and traffic emissions on a dwelling from a new road scheme. In essence, cumulative impacts are those which result from incremental changes caused by other past, present or reasonable foreseeable actions together with the proposed development. Therefore, the potential impacts of the proposed development cannot be considered in isolation but must be considered in addition to impacts already arising from existing or planned development.
- 9.54 In determining an application for a new waste management facility, account will normally be taken of the potential cumulative impact of waste management and other development within the locality and in particular the area’s capacity to absorb that change. Factors to be taken into account will include; the nature of the waste and the process involved; the direction of the prevailing wind; the amount of enclosure for the processes; use of odour neutralisation and minimisation; measures for dust control; the number of persons affected by the development and its duration; the effects on amenity that pollution would cause; local topography providing natural screening; the extent of noise and vibration generated by the operations; the proposed hours of working; and the impact of flood-lighting. In some instances, the combined impact of development over a sustained period of time may be sufficient to warrant refusal of planning permission.
- 9.55 As stated throughout this document applications will be assessed against the full suite of relevant national, London Plan and Local Plan policies and guidance. However, given the status of the NLWP as a multi-Borough 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.

Policy 7: Energy Recovery and Decentralised Energy

Policy 7: Energy Recovery and Decentralised Energy

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

Where there is no available decentralised energy network and no network is planned within range of the development, as a minimum requirement the proposal should recover energy through electricity production and be designed to enable it to deliver heat and/or energy and connect to a Decentralised Energy Network in the future.

Developers must demonstrate how they meet these requirements, or provide evidence if it is not technically feasible or economically viable to achieve them, as part of a submitted Energy Statement.

This policy helps meet strategic objectives SO1 and SO6

This policy contributes towards spatial strategy component D

- 9.56 Tackling climate change is a key Government priority for the planning system and a critical new driver for waste management. The purpose of this policy is to ensure that applications for waste management facilities incorporate opportunities for sustainable energy recovery and combined heat and power (CHP) where feasible and practicable. The policy 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.
- 9.57 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 7.
- 9.58 National policy for renewable energy says that Local Development Documents, such as the NLWP, should contain policies that promote and encourage, rather than restrict, the development of renewable energy resources. The London Plan includes minimum performance for technologies for generating energy from London's waste, known as the carbon intensity floor. This has been set at 400 grams of CO₂ eq generated per kilowatt hour (kwh) of electricity generated.

- 9.59 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 2008-2010²⁰. The programme initially focused on identifying opportunities for district heating networks through heat mapping and energy masterplanning with the London Boroughs.
- 9.60 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. The LVHN is requesting hot water to be supplied for the energy from waste facility (EfW) at Edmonton EcoPark. However, over time, the network will connect additional heat sources, including other waste developments, elsewhere in the Lee Valley.

Policy 8: Waste Water Treatment Works and Sewage Plant

Policy 8: Waste Water Treatment Works and Sewage Plant

Proposals for the provision of new or expanded facilities for the management, treatment and disposal of wastewater and sewage sludge will be permitted, provided that:

- it is demonstrated that there is an identified need for such a facility within the North London Waste Plan Area, which cannot be met through existing waste facilities; and
- the proposals meet the other policies of this North London Waste Plan together with all other relevant policies of the appropriate borough's Development Plan and meet environmental standards set by the Environment Agency.

This policy helps meet strategic objectives

This policy contributes towards

²⁰ London Heat Map – www.londonheatmap.org.uk

- 9.61 Waste Water Treatment Works in North London are operated by Thames Water, with the main facility being Deephams Sewage Treatment Works (STW), which is the ninth largest in England. Deephams STW serves a Population Equivalent (PE) of 891,000 (as at 2011). Works to Deephams STW are planned to commence in 2018 providing sufficient capacity to meet Thames Water's projections of future requirements into the next decade.
- 9.62 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 STW is highlighted in the National Planning Statement on Waste Water, and planning permission for this work was granted by Enfield Council on 20th February 2015. The site is to be retained for waste water use and Thames Water anticipates that the approved upgrade to Deephams STW will provide sufficient effluent treatment capacity to meet their needs during the plan period.
- 9.63 The Council will work with Thames Water and the Environment Agency to ensure that adequate and appropriate waste water treatment infrastructure is provided to meet environmental standards and planned demand. In September 2014 the Government approved plans to build the Thames Tideway Tunnel - a 25km conduit flowing beneath the Thames which would provide collection, storage and transfer capacity for waste water and rainwater discharge from a significant part of Central London. Construction is scheduled to begin in 2018 with completion scheduled for 2023. Once completed the new tunnel will be connected to the Lee Tunnel which will transfer sewage to the expanded Beckton Sewage Treatment complex. The proposal has indirect implications for the Plan area in that it will benefit from the additional capacity and this will relieve pressure for further expansion of local Waste Water Treatment Works.
- 9.64 Any other new waste water and sewage treatment plants, extensions to existing works, or facilities for the co-disposal of sewage with other wastes will be supported where the location minimises any adverse environmental or other impact that the development would be likely to give rise to, and the suitability of the site can be justified in accordance with this Plan. The Plan has a supporting role to identify suitable locations for additional infrastructure.

Policy 9: Control of Inert Waste

Policy 9: Control of Inert Waste

Proposals for inert landfill/landraise development will be permitted where the proposal is both essential for, and involves the minimum quantity of waste necessary for:

- a) The purposes of restoring former mineral working sites; or
- b) Facilitating an improvement in the quality of land; or
- c) Facilitating the establishment of an appropriate use; or
- d) Improving land damaged or degraded as a result of existing uses and where no other satisfactory means exist to secure the necessary improvement.

Where the above criteria are met, all proposals for landfilling/landraising should:

- a) Incorporate finished levels that are compatible with the surrounding landscape. The finished levels should be the minimum required to ensure satisfactory restoration of the land for an agreed after-use; and
- b) Include proposals for high quality restoration and aftercare of the site, taking account of the opportunities for enhancing the overall quality of the environment and the wider benefits that the site may offer, including biodiversity enhancement, geological conservation and increased public accessibility.

This policy helps meet strategic objectives

This policy contributes towards

- 9.65 Construction, demolition and excavation waste is largely made up of inert construction waste, such as bricks and hardcore which can be used in site restoration and land reclamation projects.
- 9.66 Recycling and reuse of inert waste applications for all types of development should demonstrate that viable opportunities to minimise construction and demolition waste disposal will be taken, making use of existing industry codes of practice and protocols, site waste management plans and relevant permits and exemptions issued by the Environment Agency.
- 9.67 The location of inert landfill sites is less constrained by geology. However, inert materials are more likely to be used for beneficial purposes, such as the restoration of mineral sites and in engineering works, or at other 'exempt sites' rather than disposed of at inert landfill sites. Increased use of recycled and secondary aggregates can reduce the need and demand for primary aggregates extraction.

- 9.68 Inert waste will continue to be deposited to land where it is reused for beneficial purposes, including within engineering schemes, as landfill cover, for the restoration of mineral workings, and for agricultural improvement. It will only be disposed of to land as a last resort. Proposals for inert waste landfilling operations will not be permitted unless it can be demonstrated that the waste cannot be managed through recovery operations and that there is a need to dispose of waste, consistent with the principle of net self sufficiency. Proposals on unallocated sites for the recycling of inert waste will be permitted where it can be demonstrated that there is a market need, consistent with the principle of net self-sufficiency.
- 9.69 There should be a clear benefit or benefits from the proposed development. This should be a benefit to the site itself, for example, the use of residual inert material associated with the restoration of an active or dormant mineral working the restoration of a former mineral working to agriculture or an engineering operation for the provision of a new leisure facility. However, given the likely disturbance to local communities and the local environment, for example, due to the movement of HGVs, there should be benefits for the wider area, for example, through environmental improvement or the creation of new public rights of way.

8. Monitoring and Implementation

Monitoring the Plan

- 8.1. The Planning and Compulsory Purchase Act (2004) requires planning authorities to monitor and report annually on whether the Aims and Objectives of all local plans (whether prepared individually or in conjunction with other authorities) are being achieved (paragraph 35). The 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 waste being created locally and how much is being managed at different levels in the Waste Hierarchy i.e. recycling/composting, recovery, and disposal.
- 8.2. Monitoring is also required to check on whether the intending policy outcomes of the NLWP are being delivered and whether the identified capacity gaps are being met through the allocated sites and areas listed in Policies 2 and 3. The results of monitoring will also play an important role in informing Development Management decisions when authorities determine planning applications for new waste facilities.
- 8.3. Responsibility for monitoring lies with the individual Boroughs; however, 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. Data will be collated by each Borough and included in their Authority Monitoring Report, which is produced annually.

- 8.4. 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

- 8.5. The aim of monitoring is to check whether the policy framework in the NLWP is working as intended. The proposed monitoring indicators reflect a number of National Indicators and also the statutory and non-statutory performance targets including those set by the EU, the 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 waste cannot be differentiated from those of other activities.
- 8.6. Table 13 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 13: NLWP Monitoring Indicators

Indicator	Target(s)	What it monitors	Outcome(s) sought
<p>1. Land within identified sites and areas brought forward for waste use and land outside identified sites and areas brought forward for waste use</p>	<p>In line with Table 6: land use requirements and Schedules 3 and 4 which identify suitable sites and areas for waste facilities</p>	<p>SO2 (capacity provision) Policy 2: Site allocations Policy 3: Area allocations Policy 4: Unallocated sites</p>	<p>To check that identified sites and areas are being taken up as anticipated.</p>
<p>2. New waste capacity added by management type (recycling/composting, recovery and disposal) and type of wastes handled (LACW, C&I and CD&E)</p>	<p>New waste facilities in line with Table 6: land use requirements</p>	<p>Strategic Aim (capacity supply and self-sufficiency) Strategic Aim (move waste up Waste Hierarchy) SO1 (resource efficiency) SO3 (net self sufficiency) Meeting Future Requirements as specified in the NLWP Policy 2: Site allocations Policy 3: Area allocations Policy 4: Unallocated sites</p>	<p>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 waste streams</p>

Indicator	Target(s)	What it monitors	Outcome(s) sought
		Policy 5. Reuse and Recycling Centres Policy 8 Waste Water Treatment Works and Sewage Plant Policy 9 Control of Inert Waste	
3. Total quantity of waste arisings by waste stream (LACW, C&I and CD&E) and management route (recycling/composting, recovery and disposal)	In line with Table 7 in Chapter 7 and Appendix Y of the Data Study	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 National Indicators NI192 and 193 (% LACW diverted and % landfilled)	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 principal waste streams

Indicator	Target(s)	What it monitors	Outcome(s) sought
4. Loss of existing waste capacity and location of replacement capacity	Zero loss Replacement locally, within North London or London	Strategic Aim (capacity supply and net self-sufficiency) SO2 (capacity provision and protection) Policy 1: Safeguarding existing waste management sites	Ensure sufficient capacity of the right type is available throughout the Plan period Ensure that capacity is replaced locally unless valid planning reasons are provided for not doing so.
5. Amount of waste exported to landfill by waste stream (LACE, C&I and CD&E)	Exported waste to landfill in line with Figure 12 of the NLWP	Net self-sufficiency	Waste exports are in line with those estimated in the NLWP and through the duty to co-operate
6. 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 framework (Provide opportunities for decentralised heat and energy networks) Policy 7: Energy recovery	Contribute to delivery of decentralised energy and incremental improvement in environmental performance with respect to climate change

Indicator	Target(s)	What it monitors	Outcome(s) sought
		and decentralised energy	
7. Number of applications for new waste facilities where concerns of statutory consultees regarding potential impacts can be effectively mitigated and monitored” with a target of 100%	100%	SO5 (sustainability) SO8 (protect the environment) Spatial framework (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

- 8.7. Development and adoption of the Plan must be followed by actions by a range of agencies and other organisations to ensure that its Aims and Objectives are met. The section summarises proposals for how these outcomes will be delivered and who will be responsible for them.
- 8.8. Implementation has four components – infrastructure delivery; application of the policies to planning 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 14 summarises the organisations involved in each component.

Table 14: 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 ERF plant Delivery of other facilities enabling achievement of desired performance levels
	Performance delivery	Prioritising infrastructure delivery that moves waste up the Waste Hierarchy Support / promote waste reduction

Organisation	Role	Responsibilities
		initiatives
Landowners	Infrastructure delivery	Propose new waste sites in line with NLWP policies that delivery capacity requirements
The waste industry	Infrastructure delivery	Propose new waste sites and deliver new waste facilities in line with NLWP policies that delivery capacity requirements
The Environment Agency	Regulate / monitor	<p>Advise on planning applications according to the nature of the proposal</p> <p>Assess applications for Environmental Permits, issue licences where the proposal meets the necessary standards</p> <p>Inspect operating waste sites periodically</p> <p>Collect and publish information about waste movements for use in Plan monitoring</p> <p>Monitor water quality</p>
	Performance delivery	Promote waste reduction initiatives
The Health & Safety Executive	Regulate	<p>Advise on planning applications according to the nature of the proposal</p> <p>Monitor</p>
Other statutory bodies (eg. Natural England)	Regulate / monitor	<p>Advise on planning applications according to the nature of the proposal</p> <p>Monitor protected sites such as SSSI</p>
The Greater London Authority	Performance delivery	<p>Promote waste reduction initiatives</p> <p>Promote carbon reduction initiatives</p>
	Apply Plan policies	Assessing suitability of applications against London Plan policies and

Organisation	Role	Responsibilities
		<p>priorities</p> <p>Regional coordination of waste planning</p>
London Waste and Recycling Board	Infrastructure delivery	Support to new waste infrastructure
	Performance delivery	<p>Support to waste collection authorities to deliver desired performance levels</p> <p>Support / promote waste reduction initiatives</p>

8.9. New commercial infrastructure required during the Plan period will be funded by private funding through sources that cannot be identified at this time. In addition, there may be other sources of funding available such as public sector borrowing. Facilities required for the management of LACW will be funded by NLWA. The waste industry has been invited to take part in the development of the Plan through involvement in the various consultation processes and calls for them to propose suitable sites for waste management use. The NLWP identifies infrastructure priorities for the next 15 years and this will help to provide the industry with greater certainty about waste management priorities in the North London Boroughs that can inform future investment decisions.

8.10. Table 15 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 15: How the NLWP policies will be implemented

Mechanism	Stakeholders involved	Objectives implemented
Policy 1: Safeguarding of existing waste management sites		
<p>Planning permission for the expansion or intensification of operations at existing waste facilities.</p> <p>Refusal of planning permission for non-waste use on existing waste sites unless capacity is</p>	Local planning authorities/ Landowner/developers	SO2, SO3

re-provided. Identifying compensatory provision when it is proposed to redevelop existing waste management facilities for non-waste uses.		
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	SO1, SO6

	authority Environment Agency and other statutory bodies	
Policy 8: Waste Water Treatment Works and Sewage Plant		
Planning permission and subsequent development	Thames Water / Environment Agency and other statutory bodies / local planning authorities	SO2, SO4, SO5, SO8
Policy 9: Control of Inert Waste		
Planning permission and subsequent development	Landowners and developers / waste management companies / local planning authorities / waste disposal authority Environment Agency and other statutory bodies	SO1, SO2, SO3, SO5, SO8