Appendix – Main Modifications

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

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

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

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

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

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

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

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

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

<table>
<tr><th>Waste Stream</th><th>Waste arising</th><th>Amount managed in North London</th><th>Amount managed elsewhere in London</th><th>Amount exported to landfill outside London</th><th>Amount exported to other facilities outside London</th></tr>
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<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td>LACW</td><td>845,776</td><td>718,900</td><td>1,000</td><td>68,900</td><td>56,900</td></tr>
<tr><td>C&I</td><td>762,301</td><td>402,900</td><td>34,600</td><td>251,600</td><td>73,000</td></tr>
<tr><td>C&D</td><td>443,180</td><td>248,000</td><td>108,225</td><td>30,200</td><td>31,000</td></tr>
<tr><td>Hazardous (HWDI)</td><td>53,420</td><td>313</td><td>12,663</td><td>8,557</td><td>31,887</td></tr>
<tr><td>Proportion</td><td></td><td>66%</td><td>7.5%</td><td>17%</td><td>9%</td></tr>
<tr><td>Excavation</td><td>747,242</td><td>52,523</td><td>335,862</td><td>265,415</td><td>82,463</td></tr>
<tr><td>Proportion</td><td></td><td>7%</td><td>45%</td><td>35.5%</td><td>11%</td></tr>
</table>
</td></tr>
<tr><td>MM15</td><td>39</td><td>5.29
[moved here after 5.8]</td><td>Some of this capacity will be provided by existing facilities which import waste from outside North London. In 2016, around 1 million tonnes of waste was imported in to North London. Most of the imported waste comes from immediate neighbours in Greater London, the South East and East of England and is managed in transfer stations, treatment facilities and metal recycling sites. ~~Some~~ The type of facilities in North London ~~have~~ with a wider-than-local catchment area ~~and manage waste from outside North London. This~~ include recycling and treatment facilities, in particular metal recycling and end of life vehicle (ELV) facilities as well as facilities for the processing of CDE in to recycled aggregate products for resale. Waste will continue to be imported into North London over the plan period in line with market demands. ~~The extra capacity contributes to achieving net self-sufficiency, or managing the equivalent of the overall quantity of waste within the main categories for North London and London as a whole.~~</td></tr>
<tr><td>MM16</td><td>37</td><td>5.27</td><td>In 2016, ~~1,201,964~~ 1.4 million tonnes of waste was recorded as exported from North London, ~~56%~~ 675,788 tonnes of which went to landfill. Most of the waste deposited to landfill was excavation waste (65%) followed by LACW/C&I (35%). Exports of LACW to landfill ~~in the LACW/C&I category~~ have been steadily declining in recent years~~, however an increase was shown in 2016. This is consistent~~ in line with the waste strategies of the London Mayor and the North London Waste Authority which aim to reduce the amount of waste going to landfill. ~~Therefore the increase in 2016 of exports to landfill in this category can probably be attributed to commercial and industrial waste, although the data does not identify why this has occurred.~~ Data for hazardous waste exports to landfill is shown from both the Waste Data Interrogator</td></tr>
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Ref	Page	Policy/ Paragraph	Main Modification
			(WDI) and the Hazardous Waste Data Interrogator (HWDI). The HWDI is the more accurate of the two for hazardous waste, but the total exports to landfill figure is taken from the WDI only. Exports of CD&E waste generally follow patterns of waste arising, so when more CD&E waste is generated, more is exported. ~~This pattern is shown in Table 4 and Figure 10 below.~~
MM17	37	New [after 5.27]	**Local planning authorities have a duty to cooperate with each other on strategic matters that cross administrative boundaries. Exports of waste from one waste planning authority to another is a strategic cross-boundary matter and is an important consideration in assessing the effectiveness of the NLWP. It is therefore important to understand the destination of North London's waste exports and to understand any issues which could prevent similar amounts of waste being exported in the future.** **Although North London is planning for capacity to meet the equivalent of 100% of its waste arisings, North London has no landfill sites and is not planning to open any landfill sites. This means that waste arising in London which cannot be recycled or recovered and can only be disposed of to landfill will continue to do so. Table 5 identifies the amount of waste which is expected to be disposed of to landfill over the plan period and this will form part of the annual monitoring to ensure that duty to co-operate engagement takes place if there are significant changes from current and anticipated waste exports to landfill.** **It should be noted that exports from and imports into North London are not a measure of North London's net self-sufficiency. Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste need in North London, while recognising that some imports and exports will continue. For most waste streams, the market dictates where the waste is managed, however the more capacity there is within North London, the more opportunity for North London's waste to be managed within its own boundaries.**

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

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

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

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

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

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

[Moved down to after new Table 5]

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

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

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

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

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<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td></td><td></td><td></td><td></td></tr>
<tr><td>MM26</td><td>48</td><td>Table 8 renumbered Table 5 [revised and moved here]</td><td>
Table 5: Projected arisings and management of North London’s waste 2020-2035
<table>
<tr><th>Waste Stream</th><th>Facility Type</th><th>2020</th><th>2025</th><th>2030</th><th>2035</th></tr>
<tr><td>LACW</td><td>Recycling</td><td>418,169</td><td>424,049</td><td>430,280</td><td>436,824</td></tr>
<tr><td>LACW</td><td>Recovery (EfW), Treatment</td><td>566,872</td><td>572,856</td><td>579,725</td><td>587,352</td></tr>
<tr><td>LACW</td><td>Landfill</td><td>2,000</td><td>2,000</td><td>2,000</td><td>2,000</td></tr>
<tr><td colspan="2">Total LACW arisings (capacity required for net self-sufficiency)</td><td>987,041</td><td>998,905</td><td>1,012,005</td><td>1,026,176</td></tr>
<tr><td>C&I</td><td>Recycling</td><td>525,853</td><td>566,563</td><td>609,743</td><td>634,983</td></tr>
<tr><td>C&I</td><td>Recovery (EfW), Treatment</td><td>152,448</td><td>142,523</td><td>131,513</td><td>136,957</td></tr>
<tr><td>C&I</td><td>Landfill</td><td>109,139</td><td>110,951</td><td>112,726</td><td>117,392</td></tr>
<tr><td colspan="2">Total C&I waste arisings (capacity required for net self-sufficiency)</td><td>787,440</td><td>820,037</td><td>853,982</td><td>889,332</td></tr>
<tr><td>C&D</td><td>Recycling</td><td>435,054</td><td>453,063</td><td>471,816</td><td>491,347</td></tr>
<tr><td>C&D</td><td>Landfill</td><td>22,742</td><td>23,683</td><td>24,664</td><td>25,685</td></tr>
<tr><td colspan="2">Total C&D waste arisings (capacity required for net self-sufficiency)</td><td>457,796</td><td>476,746</td><td>496,480</td><td>517,032</td></tr>
<tr><td>Hazardous</td><td>Recycling</td><td>16,838</td><td>16,838</td><td>16,838</td><td>16,838</td></tr>
<tr><td>Hazardous</td><td>Recovery, Treatment</td><td>23,846</td><td>23,846</td><td>23,846</td><td>23,846</td></tr>
<tr><td>Hazardous</td><td>Landfill</td><td>12,737</td><td>12,737</td><td>12,737</td><td>12,737</td></tr>
<tr><td colspan="2">Total Hazardous waste arisings (capacity required for net self-sufficiency)</td><td>53,421</td><td>53,421</td><td>53,421</td><td>53,421</td></tr>
<tr><td>Excavation</td><td>Beneficial use, Recycling, Treatment</td><td>733,294</td><td>763,647</td><td>795,257</td><td>828,176</td></tr>
<tr><td>Excavation</td><td>Landfill</td><td>38,594</td><td>40,192</td><td>41,856</td><td>43,588</td></tr>
<tr><td colspan="2">Total Excavation waste arisings</td><td>771,888</td><td>803,839</td><td>837,113</td><td>871,764</td></tr>
</table>
</td></tr>
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<table>
<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td>Agricultural</td><td>Recycling</td><td>89</td><td>89</td><td>89</td><td>89</td></tr>
<tr><td>Agricultural</td><td>Recovery, Treatment</td><td>9,130</td><td>9,130</td><td>9,130</td><td>9,130</td></tr>
<tr><td>Agricultural</td><td>Landfill</td><td>4</td><td>4</td><td>4</td><td>4</td></tr>
<tr><td colspan="2">Total Agricultural waste arisings</td><td>9,223</td><td>9,223</td><td>9,223</td><td>9,223</td></tr>
</table>
</td></tr>
<tr><td>MM27</td><td>30</td><td>5.5 [Moved here after Table 8]</td><td>Existing capacity

Table 6~~3~~ below summarises ~~shows~~ the existing (2016~~8~~) capacity of North London's waste management facilities ~~in North London~~ by type of facility and waste stream managed ~~and changes in available capacity at known dates when facilities come on stream/close~~. It identifies an existing waste management capacity of ~~around 4.4~~ just over a million tonnes per annum of recycling/composting for the LACW and C&I waste streams, just under 600,000 tonnes per annum of energy recovery for LACW, around 630,000 tonnes per annum of recycling and treatment for CD&E waste, and about 4,250 tonnes of hazardous waste capacity ~~reducing to around 3.8 million tonnes by 2029 as a result of known closure of some existing sites up to 2028~~. Figure 5~~9~~ shows the location of the facilities represented in Table 6~~3~~ and a full list is in Appendix 1.</td></tr>
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<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td>MM28</td><td>31</td><td>Table 3 renumbered Table 6 [Revised and moved here after 5.5]</td><td>Table 6<s>3</s>: <s>Maximum</s> Existing Annual Capacity at Licensed Operational Waste Management Facilities <s>at the Start of the Plan Period and a key dates following changes in sites capacities</s>
<table>
<tr><th colspan="2">Type of capacity</th><th>Waste stream</th><th>Existing capacity (2016)</th></tr>
<tr><td rowspan="5">Management</td><td rowspan="3">Recycling/Composting/Treatment</td><td>LACW / C&I</td><td>1,062,424</td></tr>
<tr><td>CD&E</td><td>663,436</td></tr>
<tr><td>Hazardous</td><td>4,252</td></tr>
<tr><td>Energy Recovery</td><td>LACW / C&I</td><td>597,134</td></tr>
<tr><td>Transfer</td><td>All</td><td>1,225,068</td></tr>
<tr><td>Landfill</td><td>All</td><td>0</td></tr>
</table>
Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2012-2016</td></tr>
<tr><td>MM29</td><td>32</td><td>5.6 [Moved here]</td><td>The London Plan defines the technologies and processes which constitute ‘managing’ waste and these have been applied to North London’s facilities when calculating capacity. Only facilities which recycle and compost waste or recover energy from waste count towards waste ‘management’ in North London. Transfer Stations are therefore excluded from this total, although many facilities categorised as ‘transfer stations’ do some recycling and where recycling takes place at transfer stations this has been noted in the site profiles and added to the total in Table 6. <s>When considering the overall amount of waste generated identified in Table 2 against the current capacity of waste management facilities in North London identified in Table 3, there appears to be more than enough waste management capacity. However, this does not take into account the specialism of each type of facility or</s></td></tr>
</table>

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

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

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

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

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

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

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

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<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td></td><td></td><td></td><td>capacity gaps identified in Table 7 for the chosen approach of net self-sufficiency for LACW, C&I and C&D waste streams. In order for net self-sufficiency to be achieved by 2026, in line with the London Plan, new capacity will need to be delivered by this date.</td></tr>
<tr><td>MM41</td><td>44</td><td>New Table numbered Table 8</td><td>Table 8: Reference Capacities for Land Take for New Waste Facilities

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

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

The London Plan (Policy SI8) requires Development Plans to plan for identified need and “allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste”. The London Plan also identifies existing waste sites, Strategic Industrial Land (SIL) and Locally Significant Industrial Sites as a focus for new waste capacity.</td></tr>
</table>

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

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

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

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

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

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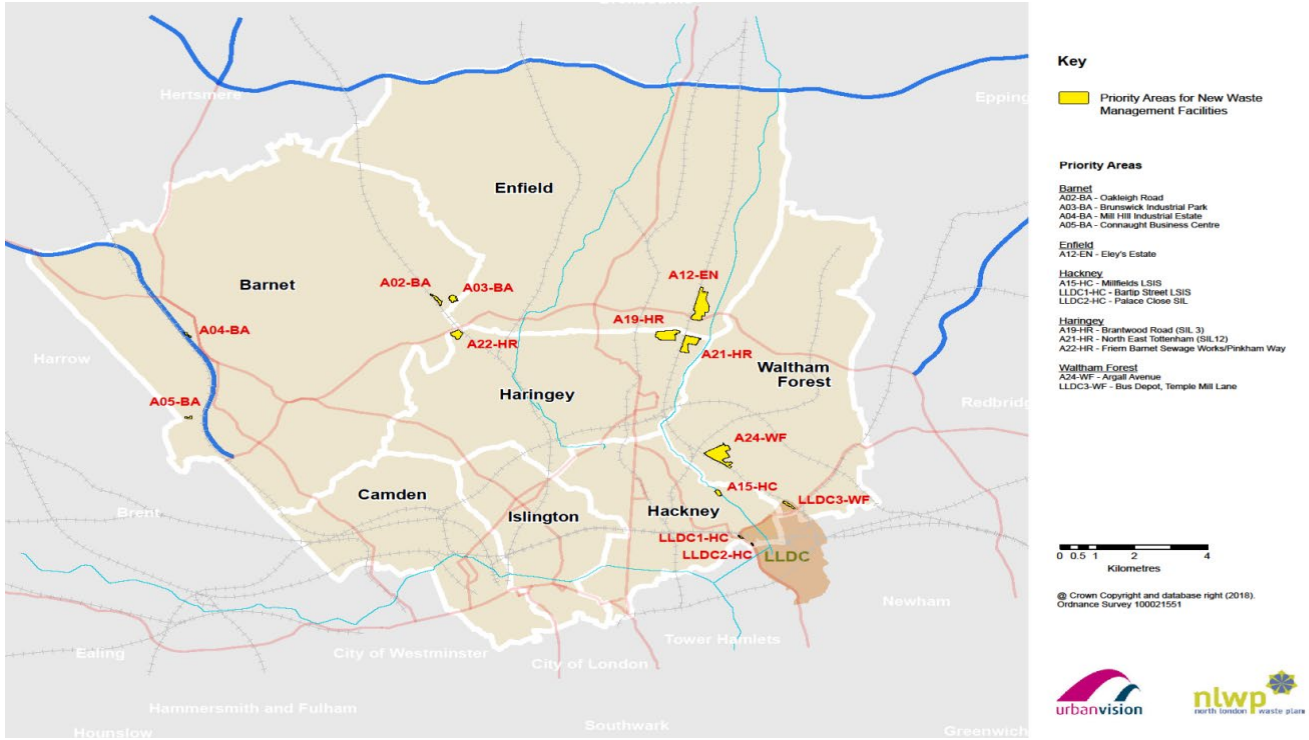
			period. This depends on the rate at which existing land becomes vacant in the identified Areas and a waste operator being ready and able to locate on that same site. This in turn depends on the wider economic factors. Identifying a range of land suitable for new waste facilities responds to the NPPW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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Table 13: Key to Waste management Facility Type

	Facility type

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<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td>A</td><td>Recycling</td></tr>
<tr><td>B</td><td>Composting (including indoor / in-vessel composting)</td></tr>
<tr><td>C</td><td>Integrated resource recovery facilities / resource parks</td></tr>
<tr><td>D</td><td>Waste recovery or treatment facility (including thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment)</td></tr>
<tr><td>E</td><td>Waste transfer</td></tr>
</table>
</td></tr>
<tr><td>MM78</td><td>68</td><td>9.11
[rearranged]</td><td>National and European requirements state that waste plans must identify locations where future waste development may take place. In addition, the London Plan requires boroughs to allocate sufficient land to provide capacity to manage apportioned waste. Policy 2 identifies ~~areas~~ Priority Areas for new waste facilities and their suitability for a range of built waste management facilities. These Priority Areas have been assessed against national, regional and local criteria, including the Strategic Objectives and Spatial Principles, and represent the most suitable areas for new waste facilities in North London. To help redress the high proportion of North London’s waste facilities already in Enfield (62%), and help deliver a better geographical spread of sites (Spatial Principle B), developers wishing to provide additional waste capacity on a new site in North London are required to demonstrate that no land is available or suitable in Priority Areas outside of Enfield before considering the Priority Area identified within the Borough. This applies to additional capacity only and not to the expansion or intensification of existing waste sites or providing compensatory capacity for sites already in Enfield. The exception to this sequential approach to site search is for Recycling and Reuse Centres (RRCs) where there is an identified need in Enfield and Barnet to improve the coverage across North London (see Policy 4). The evidence will need to demonstrate an adequate search has been undertaken which takes into account the type of waste facility proposed, the criteria set out in Table 10 and the criteria set out in policy 6.</td></tr>
<tr><td>MM79</td><td>68</td><td>9.13</td><td>In Schedules 2 and 3, the NLWP identifies thirteen ~~several areas~~ Priority Areas to provide land suitable for the development of waste management facilities, including RRCs (see Policy 4). Each ~~‘area’~~ Priority Area comprises ~~a number of individual plots of land, for example,~~ an industrial estate or employment area that is in principle suitable for waste use ~~but where land is not safeguarded for waste~~. The identification of ~~areas~~ Priority Areas ~~suitable~~ for waste uses,</td></tr>
</table>

Ref	Page	Policy/ Paragraph	Main Modification
			subject to detailed site assessment at planning application stage, will help to achieve net self-sufficiency whilst encouraging co-location of facilities and complementary activities (an objective of the NPPW and Spatial **Principle C** ~~Framework~~). **Areas listed in Schedule 2:** ~~Areas~~ **Priority Areas** listed in *Schedule 2: ~~Areas suitable~~* ***Priority Areas*** *for waste management and Schedule 3: ~~Areas~~* ***Priority Areas*** *identified in LLDC Local Plan* **suitable for waste management and Schedule 3: Areas identified in LLDC Local Plan suitable for new waste facilities will be identified in borough policies maps, and any new waste sites will be safeguarded and identified in borough policies maps.**
MM80	68	9.14	The ~~areas~~ **Priority Areas** are considered to be in the most suitable, sustainable and deliverable locations in North London for new waste management facilities when assessed against a range of environmental, economic and social factors **(see STRATEGIC OBJECTIVE 5)** and the Spatial **Principles** ~~Framework~~. **The location of new waste facilities and compensatory capacity will be monitored through Monitoring Indicator IN3.**
MM81	69	9.15	~~The site~~ **Area** profiles in Appendix 2 **are provided to assist developers who wish to build a waste facility in North London. The Profiles** indicate the size of each ~~area~~ **Priority Areas**, the type of facility likely to be accommodated on the area, **constraints,** and any mitigation measures which may be required. Developers should be aware that any type of facility listed as potentially suitable is subject to consideration against the full suite of relevant local planning policies/guidance.
MM82	69	9.16	The ability of ~~areas~~ **Priority Areas** to accommodate a range of types and sizes of waste management facility is important to the flexibility of the Waste Plan. Table 13: Key to Waste Management Facility Types contains a full list of the types of facilities which were considered when assessing ~~sites~~ **Areas** and which may be required over the plan period to meet the identified capacity gap **and to provide new sites for compensatory capacity**. The facility types identified are broad categories which may come forward over the plan period. The order of facility types reflects their place in the waste hierarchy, with categories A and B at the 'recycling' level and C-E at the 'other recovery' level. Applicants should take account of this order when

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

~~To ensure that inert waste is managed in line with the waste hierarchy~~</td><td>Strategic Aim (capacity supply and self-sufficiency) Strategic Aim (move waste up Waste Hierarchy) SO1 (resource efficiency) SO3 (net self-sufficiency)
Meeting Future Requirements as specified in the NLWP
% waste diverted and % landfilled</td><td>To check that the NLWP is planning for the right amount of waste

~~Waste Policy and London Plan targets~~

~~Ensure the NLWP delivers a net self-sufficient waste management outcome for the principal waste streams~~

~~To ensure that proposals involving the importation and disposal of inert waste to land are achieving in line with waste hierarchy.~~</td></tr>
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Ref	Page	Policy/ Paragraph	Main Modification				
			IN2	**Waste management capacity (Table 8) by waste stream and management route, including existing capacity, new capacity, loss of capacity, compensatory capacity and capacity gaps** ~~3. Tonnage of waste capacity, including new waste capacity available by management type (recycling/composting, recovery and disposal) and type of wastes handled (LACW, C&I and CD&E)~~ ~~4. Loss of existing waste capacity and provision of replacement capacity~~	**Capacity to meet net self-sufficiency targets in Tables 6 and 8** Zero loss **of capacity** Replacement ~~locally,~~ within ~~the Borough,~~ North London ~~or London~~ Replacement capacity for Brent Cross Cricklewood provided within Barnet ~~Capacity sufficient to manage capacity requirements as set out in Table 6 Capacity Gaps. New waste facilities in line with Table 7: land take requirements~~	Strategic Aim (capacity supply and self-sufficiency) Strategic Aim (move waste up Waste Hierarchy) SO1 (resource efficiency) SO3 (net self-sufficiency) Meeting Future Requirements as specified in the NLWP Policy 2: Area allocations Policy 3: Unallocated sites Policy 4. Reuse and Recycling Centres Policy 7 Waste Water Treatment Works and Sewage Plant Policy 8 Control of Inert Waste	**To check that capacity is increasing to meet net self-sufficiency targets** <u>Ensure sufficient capacity of the right type is available throughout the plan period</u> Ensure that capacity is replaced locally **unless net self-sufficiency has been met** ~~valid planning reasons are provided for not doing so~~.
			IN3	**Location of new waste facilities and**	**Land within Schedules 1, 2, 3**	SO2 (capacity provision) **Policy 1: Existing waste management sites**	To check that identified sites and areas are being taken up as anticipated.

Ref	Page	Policy/ Paragraph	Main Modification				
				compensatory capacity ~~1. Amount of Land within identified areas or on windfall sites brought forward for waste use during the plan period.~~	~~In line with Table 7: landtake requirements~~ SO2 (capacity provision) **Policy 1: Existing waste management sites** Policy 2: Area allocations Policy 3: Unallocated sites	Policy 2: Area allocations Policy 3: Unallocated sites	**To monitor if land within Schedules 1, 2 and 3 is not available or suitable for new waste facilities.**
			IN4	~~2.~~ Sites in Schedule 1 and Areas in Schedules 2 and 3 lost to other non-industrial uses through a major regeneration scheme or designated for non-industrial uses in a review of the London Plan or Local Plan	Less than 25% of land lost If 50% of land is lost this will trigger review of plan	SO2 (capacity provision) Policy 2: Area allocations	To check that identified land is sufficient to deliver the plan's aims To ensure sufficient existing capacity remains for managing the levels of waste expected across North London over the plan period as set out in Table 8.
			IN5	**The number of sites consented that offer non-road transport options, the number of those sites where such options have been implemented and the total tonnage**	**Facilities where non-road forms of transport are used to move waste and recycling**	**SO5 (sustainability) SO7 (sustainable transport)**	**Reduce impact on climate change Improve amenity**

Ref	Page	Policy/ Paragraph	Main Modification				
				transported through non-road options (where known).			
			IN6	**Enforcement action taken against waste sites by the local authority and/or Environment Agency on breach of planning conditions or environmental permit** ~~7. Number of approvals for new waste facilities which meet legislative requirements~~	**Zero** ~~100%~~	SO5 (sustainability) SO8 (protect the environment) Spatial **Principles** ~~framework~~ (Reduce impact on amenity) Policy 5: Assessment Criteria for waste management facilities and related development	**To ensure sites do not cause harm to the environment or local communities** ~~Avoid impact on sensitive receptors or maximise scope for effective mitigation~~
			IN7	~~6.~~ Amount of waste **imported and** exported ~~to landfill~~ by waste stream **and management route** ~~(LACW, C&I and CD&E)~~	Exported waste to landfill in line with Table **6**~~9~~ of the NLWP **Reduction in waste exports**	Net self-sufficiency **Changes to imports and exports**	Waste exports are in line with those estimated in the NLWP and through the duty to co-operate
			IN8	~~8.~~ Number of new CHP facilities serving district heat networks in which the principal	Monitor only	Strategic Aim (green London)	Monitor only

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<tr><td></td><td>fuel source is residual waste or recovered waste fuel</td><td></td><td></td><td></td></tr>
<tr><td>IN9</td><td><s>9.</s> Sufficient infrastructure in place for management of waste water</td><td>Monitor only – information to be obtained from Thames Water</td><td>Strategic Aim (capacity supply and self-sufficiency)
SO5 (sustainability)</td><td>To ensure that Thames Water have sufficient capacity to management the levels of waste water generated in North London over the plan period</td></tr>
</table>
</td></tr>
<tr><td>MM104</td><td></td><td>Table 15</td><td>
Table 15: Roles and responsibilities involved in implementing the Plan
<table>
<tr><th>Organisation</th><th>Role</th><th>Responsibilities</th></tr>
<tr><td rowspan="3">Local planning authorities (including London Legacy Development Corporation)</td><td>Apply Plan policies</td><td>Assessing suitability of applications against Plan policies and priorities Deliver the strategic objectives and policies of the NLWP alongside wider development and regeneration objectives</td></tr>
<tr><td>Regulate / monitor</td><td>Inspect operating waste sites periodically

Appoint a lead borough to monitor the plan and carry out the duty to co-operate when required

Publish annual monitoring reports in the NLWP

<s>Monitor Plan performance annually</s></td></tr>
<tr><td>Performance delivery</td><td>Support / promote waste reduction initiatives through the planning system</td></tr>
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<tr><td>MM105a</td><td></td><td>Schedule 1</td><td>~~Table 1:~~ Schedule 1: Existing safeguarded waste sites in North London
<table>
<tr><th>Site ID</th><th>Site Name</th><th>Site Address</th><th>Waste Stream</th><th>Managed Waste</th><th>2012</th><th>2013</th><th>2014</th><th>2015</th><th>2016</th><th>~~Borough~~</th></tr>
<tr><td>BAR1</td><td>Winters Haulage, Oakleigh Road South</td><td>British Rai Sidings, Oakleigh Road South, Southgate, London N11 1HJ</td><td>C&I / CDE</td><td>X</td><td>10,495</td><td>38,503</td><td>40,409</td><td>35,379</td><td>0</td><td></td></tr>
<tr><td>BAR2</td><td>Scratchwood Quarrry</td><td>London Gateway Service Area, M1 Motorway, Mill Hill, London NW7 3HU</td><td>CDE</td><td>✓</td><td>52,835</td><td>71,064</td><td>99,060</td><td>102,527</td><td>131,505</td><td>~~Barnet~~</td></tr>
<tr><td>BAR3 ◆</td><td>P B Donoghue, Claremont Rd</td><td>3 Shannon Close, Claremont Rd, Cricklewood, London NW2 1RR</td><td>CDE</td><td>✓ (95%)</td><td>0</td><td>118,964</td><td>112,449</td><td>112,487</td><td>111,226</td><td>~~Barnet~~</td></tr>
</table></td></tr>
</table>

Ref	Page	Policy/ Paragraph	Main Modification										
			BAR 4◆	WRG, Hendon Rail Transfer Station	**Hendon Rail Transfer Station, Brent Terrace, Hendon, London NW2 1LN**	**LACW**	**X**	**153,952**	**164,129**	**114,457**	**128,605**	**142,107**	~~Barnet~~
			BAR 5	Summers Lane Reuse and Recycling Centre	**Civic Amenity & Waste Recycling Centre, Summers Lane, London N12 0RF**	**LACW**	**X**	**15,612**	**16,361**	**17,206**	**10,584**	**18,237**	~~Barnet~~
			BAR 6◆	McGovern Brothers, Brent Terrace, Hendon	**26-27 Brent Terrace, Claremont Industrial Estate, Hendon, London NW2 1BG**	**C&I / CDE**	**X**	**78,488**	**76,609**	**78,855**	**106,206**	**102,373**	~~Barnet~~
			BAR 7◆	Cripps Skips, Brent Terrace	**Nightingale Works, Brent Terrace, Claremont Way Industrial Estate, London NW2 1LR**	**C&I / CDE**	**X**	**9,726**	**7,719**	**8,807**	**9,408**	**8,910**	~~Barnet~~
			BAR 8	Apex Car Breakers, Mill Hill	**Ellesmere Avenue, Mill Hill, London NW7 3HB**	**C&I**		**182**	**162**	**227**	**256**	**243**	~~Barnet~~

Ref	Page	Policy/ Paragraph	Main Modification										
			BAR 9	**Vacant (previously ~~Railway Arches, Hendon~~ Savecase Ltd)**	**Railway Arches, Colindeep Lane, Hendon, London NW9 6HD**	**C&I**	**N/A**	**0**	**0**	**0**	**0**	**0**	~~Barnet~~	
			BAR 10	GBN Services Ltd, New Southgate	**Land/Premises at Oakleigh Road South, Friern Barnet, London N11 1HJ**	**CDE**	**✓ (72%)**	**14,596**	**29,938**	**29,456**	**31,274**	**10,746**	~~Barnet~~	
			BAR 11	Upside Railway Yard	**Upside Railway Yard, Brent Terrace, Cricklewood, London NW2 1LN**	**CDE**	**X**	**0**	**0**	**0**	**0**	**234,930**	~~Barnet~~	
			CAM 1	Regis Road Reuse and Recycling Centre	**Regis Road, Kentish Town, London NW5 3EW**	**LACW**	**X**	**-**	**2,535**	**5,409**	**5,595**	**5,119**	~~Camden~~	
			ENF 1	Crews Hill Transfer Station	**Kingswood Nursery, Theobalds Park road, Crews Hill, Enfield, Middlesex EN2 9BH**	**C&I**	**X**	**17,466**	**17,124**	**19,231**	**19,507**	**18,427**	~~Enfield~~	
			ENF 2	Barrowell Green Recycling Centre	**Barrowell Green, Winchmore Hill,**	**LACW**	**X**	**10,715**	**14,556**	**13,837**	**11,541**	**16,923**	~~Enfield~~	

Ref	Page	Policy/ Paragraph	Main Modification										
					London N21 3AU								
			ENF 3	Pressbay Mpotors Ltd, Motor Salvage Complex	**Motor Salvage Complex, Mollison Avenue, Brimsdown, Enfield Middlesex EN3 7NJ**	**C&I**	✓	**63**	**63**	**26**	**29**	**37**	~~Enfield~~
			~~ENF 4~~	~~Chase Farm Hospital, The Ridgeway (SITA)~~									~~Enfield~~
			ENF 5	Jute Lane, Brimsdown	**Greenwood House, Jute Lane, Brimsdown, Enfield, Middlesex EN3 7PJ**	**LACW**	✓ **(76%)**	**16,115**	**11,732**	**12,659**	**10,125**	**15,410**	~~Enfield~~
			ENF 6	**AMI Waste (Tuglord Enterprises)** ~~Stacey Avenue~~	**17 Stacey Avenue, Edmonton, London N18 3PP**	**C&I / CDE**	**X**	**16,855**	**27,043**	**28,566**	**23,004**	**21,974**	~~Enfield~~
			ENF 7	**Vacant (formerly** Budds Skips**)**, ~~The Market Compound, Harbert Road~~	**The Market Compound, 2 Harbert Road, Edmonton, London N18 2HQ**	**C&I / CDE**	**-**	**834**	**802**	**1,778**	**0**	**0**	~~Enfield~~
			ENF 8	Biffa Edmonton **(AKA Greenstar Environme**	**Atlas at Aztec 406, 12 Adra Road, Off Meridian**	**LACW / C&I**	✓ **(84%)**	**231,771**	**72,530**	**271,888**	**276,855**	**270,106**	~~Enfield~~

Ref	Page	Policy/ Paragraph	Main Modification											
					ntal)~~,~~ ~~Adra Road, Edmonton~~	**Way, Enfield, London N9 0BD**								
				ENF 9	Hunt Skips, Commercial Road, Edmonton	**Rear of 160 Bridport Road, Commercial Road, Edmonton, London N18 1SY**	**C&I / CDE**	✓	**9,935**	**-**✓	**20,359**	**-**	**8,719**	~~Enfield~~
				ENF 10	Rooke & Co Ltd, Edmonton	**Montague Road Industrial Estate, 22-26 First Avenue, Edmonton, London N18 3PH**	**C&I**	✓	**32,249**	**24,867**	**28,095**	**25,235**	**3,897**	~~Enfield~~
				ENF 11	Edmonton Bio Diesel Plant **(Pure Fuels)**	**Unit A8 Hasting wood Trading Estate, Harbet Road, London N18 3HT**	**C&I**	✓	**512**	**738**	**895**	**1,251**	**-**	~~Enfield~~
				ENF 12	Camden Plant~~, Lower Hall Lane, Chingford~~	**Camden Plant, Lower Hall Lane, Chingford,**	**CDE**	✓	**236,950**	**232,590**	**241,900**	**216,334**	**206,806**	~~Enfield~~
				ENF 13	Personnel Hygiene Services Ltd, Princes Road, Upper Edmonton	**10 Prices Road, Edmonton, London N18 3PR**	**C&I**	**X**	**0**	**0**	**95**	**1,004**	**1,081**	~~Enfield~~

Ref	Page	Policy/ Paragraph	Main Modification										
			ENF 14	**Vacant (Formerly Lee valley Motors Ltd)**	**Second Avenue, Edmonton**	**C&I**	**N/A**	**0**	**0**	**0**	**0**	**0**	
			ENF 15	~~Yard 10 - 12 Hastingwood Trading Estate.~~ A&A Skip Hire Limited	**Yard 10-12, Hastingwood Trading Estate, Harbet Road, Edmonton, London N18 3HR**	**C&I**	✓ **(89%)**	**0**	**0**	**9.391**	**16,277**	**10,696**	~~Enfield~~
			ENF 17	Albert Works~~, Kenninghall Road, Edmonton~~	**Albert Works, Kenninghall Road, Edmonton, London N18 2PD**	**C&I**	✓	**193,308**	**224,020**	**233,225**	**211,424**	**-**	~~Enfield~~
			ENF 18	Edmonton Energy from Waste Facility	**Edmonton Ecopark, Advent Way, Edmonton, London N18 3AG**	**LACW**	✓	**546,402**	**526,829**	**560,685**	**550,408**	**597,134**	
				London Energy Ltd Composting	**Edmonton Ecopark, Advent Way, Edmonton, London N18 3AG**	**LACW**	✓	**32,498**	**32,779**	**35,241**	**32,475**	**33,981**	
				London Energy Bulk Waste Recycling Facility	**Edmonton Ecopark, Advent Way, Edmonton,**	**LACW**	**X**	**192,907**	**190,333**	**168,121**	**152,227**	**198,389**	

Ref	Page	Policy/ Paragraph	Main Modification										
					London N18 3AG								
				Ballast Phoenix Ltd	**Edmonton Ecopark, Advent Way, Edmonton, London N18 3AG**	**LACW**	✓	**58,255**	**106,341**	**112,419**	**109,141**	**101,189**	
			~~ENF 19~~	~~London Waste Ltd Composting, Edmonton EcoPark, Advent Way~~									~~Enfield~~
			~~ENF 20~~	~~London Waste Bulk Waste Recycling Facility, Edmonton EcoPark, Advent Way~~									~~Enfield~~
			~~ENF 20~~	~~London Waste Ltd, Edmonton EcoPark, Advent Way~~									~~Enfield~~
			~~ENF 22~~	~~London Waste Ltd, Edmonton EcoPark, Advent Way~~									~~Enfield~~
			ENF 23	J O'Doherty Haulage, Noble Road, Edmonton	**Pegamoid Site, Noble Road, Edmonton, London N18 3BH**	**C&I**	✓ **(59%)**	**85,103**	**69,124**	**64,897**	**77,305**	**88,636**	~~Enfield~~

Ref	Page	Policy/ Paragraph	Main Modification										
			ENF 24	Oakwood Plant Ltd, Edmonton	**Oakwood House, Nobel Road, Eley Industrial Estate, Edmonton, London N18 3BH**	**C&I / CDE**	✓ **(84%)**	**10,282**	**7,495**	**10,011**	**13,489**	**14,428**	~~Enfield~~	
			ENF 25	Environcom Ltd **(Eedmonton Facility)**~~, Stonehill Business Park, Edmonton~~	**Unit 8a Towpath Road, Stonehill Business Park, N18 3QU**	**Hazardous (WEEE)**	✓	**2,447**	**1,327**	**9.194**	**11,040**	**67**	~~Enfield~~	
			ENF 26	Powderday Plant Ltd, Jeffreys Road	**Unit 2, Jeffreys Road, Brimsdown, Enfield, Middlesex EN3 7UA**	**C&I / CDE**	✓	**27,319**	**18,664**	**48,851**	**23,490**	**49,754**	~~Enfield~~	
			~~ENF 27~~	~~Edmonton EFW~~									~~Enfield~~	
			ENF 30	**Hunsdon Skip Hire (Previously L&M Skips and London & Metropolitan Recycling)**	**Unit 1, 1b Towpath Road, Stonehill Business Park, London N18 3QX**	**C&I / CDE**	✓	**0**	**7,150**	**26,545**	**15,501**	**11,337**		
			ENF 31	Volker Highways Ltd	**15 Edison Road, Brimsdown Industrial Estate,**	**C&I / CDE**	✓	**-**	**8.892**	**13,652**	**7.344**	**-**		

Ref	Page	Policy/ Paragraph	Main Modification										
					Enfield EN3 7BY								
			~~ENF 32~~	~~Guy Lodge Farm~~									~~Enfield~~
			~~ENF 33~~	~~Ballast Phoenix Ltd~~									~~Enfield~~
			~~ENF 34~~	~~London & Metropolitan Recycling Facility~~									~~Enfield~~
			ENF 35	**Redcorn (ELV)** ~~Unit 25 Enfield Metal Kingswood Nursery, Theobalds Park Road~~	**22a & 24 Stacey Avenue, Montague Industrial estate, Enfield N18 3PS**	**Hazardous (C&I)**	✓	**-**	**-**	**-**	**-**	**6,557**	~~Enfield~~
			~~ENF 36~~	~~Greenstar Environmental~~									~~Enfield~~
			ENF 37	GBN	**Gibbs Road, Montague Industrial Estate, London N18 3PU**	**CDE**	✓						
			HAC 1	Millfields Waste Transfer & Recycling Facility	**Millfields Recycling Facility, Millfields Road, Hackney, London E5 0AR**	**LACW**	**X**	**18,202**	**13,935**	**14,173**	**16,785**	**16,725**	~~Hackney~~
			HAC 2	Downs Road Service Station ~~(Brydon Motor~~	**1A Downs Road, Clapton,**	**C&I**	✓	**177**	**175**	**96**	**101**	**-**	~~Hackney~~

Ref	Page	Policy/ Paragraph	Main Modification										
				~~Company Clapton)~~	**London E5 8QJ**								
			~~HAR 1/2~~	Hornsey Central Depot, Haringey LBC									~~Haringey~~
			HAR 3	**Biffa Waste Services** Ltd, Garman Road, Tottenham	**81 Garman Road, Tottenham, London N17 0UN**	**C&I**	✓	**28,851**	**30,355**	**34,690**	**33,704**	**37,454**	~~Haringey~~
			HAR 4	O'Donovan, Markfield Road, Tottenham	**100a Markfield Road, Tottenham, London N15 4QF**	**C&I / CDE**	✓ **(50%)**	**6,316**	**10,099**	**11,143**	**7,035**	**14,693**	~~Haringey~~
			HAR 5	Redcorn Ltd, White Hart Lane, Tottenham	**44 White Hart Lane, Tottenham, London N17 8DP**	**C&I**	✓	**15,712**	**22,733**	**23,852**	**8,508**	**-**	~~Haringey~~
			HAR 6	Restore Community Projects~~, Ashley Road, Tottenham~~	**Unit 18, Ashley Road, Tottenham, London N17 9LJ**	**C&I**	✓	**24**	**103**	**185**	**278**	**98**	~~Haringey~~
			HAR 7	Redcorn **Ltd, Brantwood Road** ~~/ Brantwood Auto Recycling Ltd, Willoughby Lane~~	**Brantwood Road, Tottenham, London N17 0ED**	**C&I**	✓	**2,470**	**5,225**	**2,250**	**23,779**	**39,283**	~~Haringey~~
			HAR 8	O'Donovan~~, Markfield~~	**82 Markfield**	**CDE**	✓	**5,079**	**27,330**	**31,460**	**25,674**	**123,308**	~~Haringey~~

Ref	Page	Policy/ Paragraph	Main Modification										
				~~Road,~~ ~~Tottenham~~	**Road, Tottenham, London N15 4QF**								
			HAR 9	Par View Road Reuse and Recycling centre	**Civic Amenity Site, Park View Road, Tottenham, London N17 9AY**	**LACW**	**X**	**3,706**	**2,409**	**6,326**	**5,499**	**5,745**	~~Haringey~~
			HAR 10	~~London Waste Ltd,~~ Western Road **Re-use and Recycling Centre** ~~HWRC~~	**Western Road, Haringey N22 6UG**	**LACW**	**X**	**0**	**0**	**2,526**	**4,851**	**3,799**	~~Haringey~~
			HAR 11	**Durnford Street Car Dismantlers & Breakers**	**6-40 Durnford Street, Tottenham, London N15 5NQ**	**C&I**	✓	**0**	**0**	**0**	**432**	**288**	
			ISL 1	Hornsey Household Re-use & Recycling Centre **and Transfer Station**	**Hornsey street, Islington, London N7 8HU**	**LACW**	**X**	**196,818**	**195,018**	**203,919**	**204,496**	**212,232**	~~Islington~~
			WAF 1	**Mercedes Parts Centre**	**21 Chingford Industrial Estate, Hall Lane, Chingford, London E4 8DJ**	**C&I**	✓	**0**	**0**	**0**	**0**	**7**	

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			WAF 2	Kings Road Household Waste Recycling Centre	**Civic Amenity Site, 48 Kings Road, Chingford, London E4 7HR**	**LACW**	**X**	**1,213**	**881**	**2,178**	**2,400**	**2,853**	~~Waltham Forest~~
			WAF 3	South Access Road Household Waste Recycling Centre	**42a South Access Road, Walthamstow, London E17 8BA**	**LACW**	**X**	**2,917**	**2,784**	**6,790**	**6,949**	**7,203**	~~Waltham Forest~~
			~~WAF 4~~	~~GBN Services, Estate Way, Leyton~~									~~Waltham Forest~~
			WAF 5	**Vacant (previously** T J Autos (UK) Ltd)	**17 Rigg Approach, Leyton, London E10 7QN**	**C&I**	✓	**53**	**53**	**81**	**21**	**11**	~~Waltham Forest~~
			~~WAF 6~~	~~BJ Electronics, Ravenswood Road Industrial Estate, Walthamstow~~									~~Waltham Forest~~
			WAF 8	Leyton Reuse & Recycling Centre	**Gateway Road, Leyton, London E10 5By**	**LACW**	**X**	**2,164**	**2,255**	**2,564**	**3,003**	**2,589**	~~Waltham Forest~~
			WAF 9	**Vacant (formerly BD & G parts for Rover)**	**Roxwell Trading Park, Leyton**	**C&I**	**-**	**0**	**0**	**0**	**0**	**0**	

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WAF 10	Malbay Waste Disposal Ltd, Staffa Road, Leyton	**5 Staffa Road, Leyton, London E10 7PY**	**C&I / CDE**	✓	**6,700**	**10,682**	**12,624**	**7,339**	**9,925**	~~Waltham Forest~~
WAF 1**2**~~1~~	Argall Metal Recycling Baseforce ~~Metals, Unit 1, Staffa Road, Leyton~~	**Unit 1, Staffa Road E10 7PY**	**C&I**	✓	**0**	**21,537**	**31,603**	**30,378**	**0**	~~Waltham Forest~~
WAF 14	Tipmasters	**15 Rigg Approach, London E10 7QN**	**C&I**	**X**	**0**	**0**	**586**	**2,847**	**3,622**	~~Waltham Forest~~
~~WAF 15~~	~~Bits and Parts~~									~~Waltham Forest~~
WAF 16	**Whipps Cross Hospital Clinical Waste Treatment Facility**	**Whipps Cross Hospital, Whipss Cross Road, London E11 1NR**	**C&I (clinical)**	**X**	**0**	**0**	**0**	**0**	**5**	

[footnote to BAR3, BAR4, BAR6 and BAR7**]**

These sites will be redeveloped under the ~~approved~~ planning permission for the regeneration of Brent Cross Circklewood (Barnet planning application reference F/04687/13). The Hendon Rail Transfer Station (BAR 4) will be replaced ~~as part of the BXC development~~ with a new facility ~~on site S01 BA~~ to meet the NLWA's requirements. **Planning permission for a new Waste Transfer Station (WTS) at Geron Way was granted by Barnet Council in September 2018.** The existing **commercial** facilities at BAR 6 and BAR 7 fall within the land required to deliver the ~~first~~ **early** Southern phase of the BXC regeneration ~~which is anticipated will~~ **has** commence**d; replacement capacity for these sites will be sought in accordance with the**

Ref	Page	Policy/ Paragraph	Main Modification
			planning permission for Brent Cross Cricklewood. ~~in early 2018. Replacement capacity for these sites will not be provided prior to their redevelopment and therefore replacement capacity will be sought outside of the BXC regeneration area on alternative sites / areas to be identified within the London Borough of Barnet.~~ **The BAR3 site is identified for redevelopment in Phase 4 of the BXC regeneration. It is planned that capacity at the waste facilities of BAR4, BAR6 and BAR7 and part of the capacity of BAR3 will be replaced by the new Waste Transfer Station (WTS) delivered as part of the Brent Cross Cricklewood Regeneration. The balance of the replacement capacity for BAR3 would need to be identified prior to its redevelopment and the London Borough of Barnet will seek to provide replacement capacity within the borough. The Barnet Local Plan will identify potential sites.**

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

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			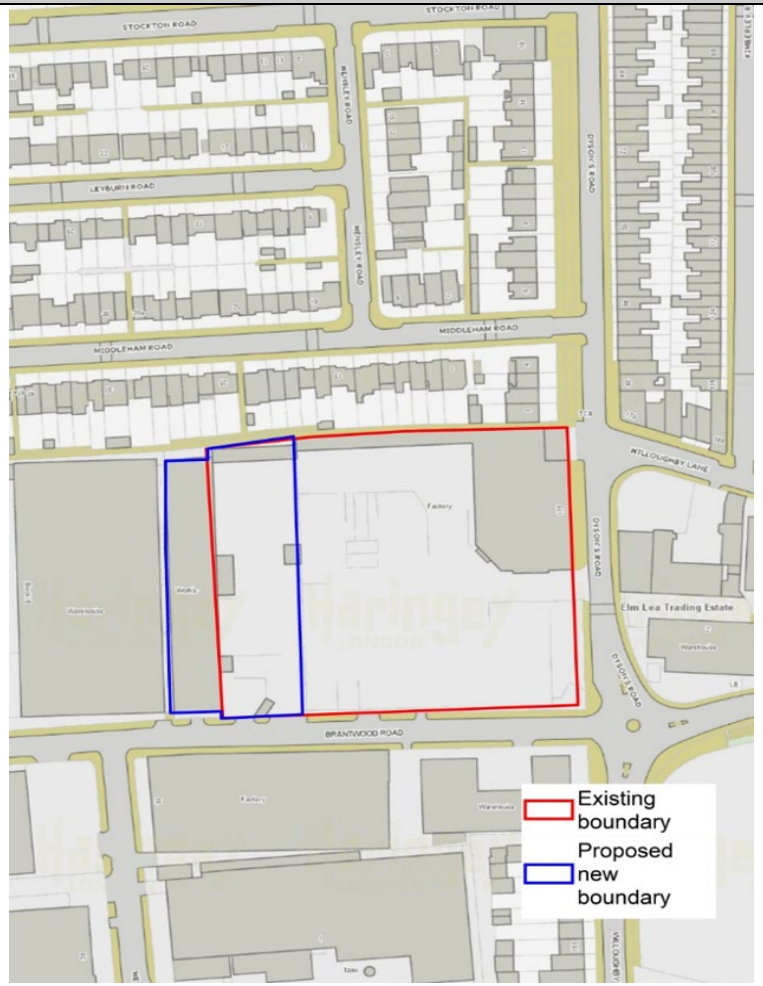

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<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td>MM106</td><td></td><td>Appendix 2: Barnet Area Profiles</td><td>A05-BA Connaught Business Centre

<table><tr><td>Historic Environment</td><td><s>No assets identified in vicinity.</s> Within Watling Street Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</td></tr></table></td></tr>
<tr><td>MM107</td><td></td><td>Appendix 2: Enfield Area Profiles</td><td>12-EN Eleys Estate, Enfield

<table><tr><td>Historic Environment</td><td>Historic England commented that development should avoid harm to the historic environment and the setting of Chingford Mill Pumping Station (grade II) should be considered<s>. The potential archaeology value of area should be considered</s> along with the setting of Montagu Road Cemeteries Conservation Area.
Within the Lea Valley West Bank Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</td></tr></table></td></tr>
<tr><td>MM108</td><td></td><td>Appendix 2: Hackney Area Profiles</td><td>A15-HC Millfields LSIS

<table><tr><td>Historic Environment</td><td>There are three Grade II listed buildings adjacent to the west of site:
Hackney Borough Disinfecting Station (on Heritage at Risk Register)
Shelter House
Caretakers Lodge</td></tr></table></td></tr>
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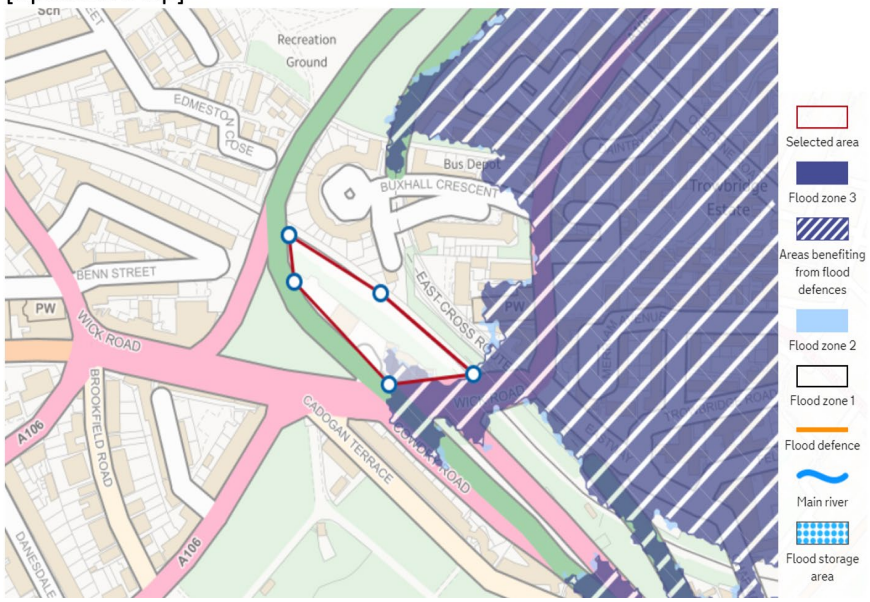
Ref	Page	Policy/ Paragraph	Main Modification
			The Mandeville Primary School which is Grade II listed is situated to the south of the area. Historic England has commented that any development within the area located to the east and north of these assets must address their long term conservation needs in a comprehensive manner. **Within Lea Valley Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.**
MM109		Appendix 2: Hackney LLDC Area Profiles	LLDC1-HC Bartrip Street Flood Risk: ~~Part of the southern area of Bartip St LSIS is within Flood Zone 2 (medium risk) although the area benefits from flood defences. The area is at risk from surface water flooding.~~ **The site area is largely within Flood Zone 1 with the southern most part falling partially within Flood Zones 2 and 3, noting that the Flood Zone 3 is within an area benefiting from defence. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.** **The site area is shown to flood from the River Lea / Lee Navigation in the 1% AEP event (without defences) and this will potentially increase in the future as a result of climate change with 1% AEP event covering a greater extent of the site. The River Lea / Lee Navigation benefits from defences**

Ref	Page	Policy/ Paragraph	Main Modification	
				and a site-specific flood risk assessment should consider how much these benefit the site area. **A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.** **Part of the site area benefits from existing flood defences.** Part of the site area benefits from existing flood defences. [updated map] 

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<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td>MM110</td><td></td><td>Appendix 2: Hackney LLDC Area Profiles</td><td>LLDC2-HC Chapman Road (Palace Close)

<table><tr><td>Flood Risk</td><td><s>Flood Zone 2 (Medium probability of flooding) however the area benefits from flood defences.</s>
<s>The area is at risk from surface water flooding.</s>

The site area falls partially within Flood Zone 1 and 2 but is largely in Flood Zone 3, noting that this is within an area benefiting from defences. The proposed use for the site is considered to be ‘Less Vulnerable’. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.

The site area is shown to flood from the River Lea / Lee Navigation in the 1% AEP event (without defences) and this will potentially increase in the future as a result of climate change with 1% AEP event covering a greater extent of the site area. The River Lea / Lee Navigation benefits from defences and a site-specific flood risk assessment should consider how much these benefit the site area.
A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.

The majority of the site area benefits from existing flood defence.</td></tr></table></td></tr>
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<tr><td>MM111</td><td></td><td>Appendix 2: Haringey Area Profiles</td><td>A19-HR Brantwood Road
<table>
<tr><td>Flood Risk</td><td><s>The eastern section of the area lies within Flood Zone 2 (medium probability of flooding).</s>
<s>The area is at risk from surface water flooding.</s>

The site area is largely Flood Zone 1 with the western most part of the site area falling partially within Flood Zone 2. The proposed use for the site is considered to be ‘Less Vulnerable’. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.</td></tr>
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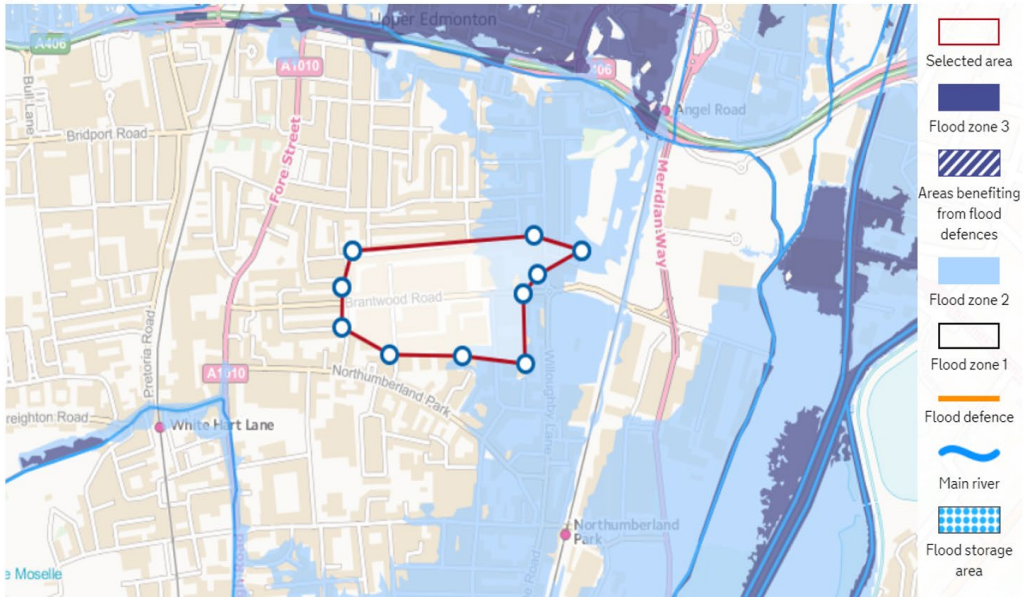
				The site area is shown to flood from the Pymmes Brook in the 0.1% AEP event (without defences) and this will increase in the future as a result of climate change with 1% AEP event to cover approximately one quarter of the site area. **A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.** [updated map] 
MM112		Appendix 2: Haringey Area Profiles	A21-HR North East Tottenham	
			Historic Environment	~~No assets identified in vicinity.~~ **Within the Lee Valley Archaeological Priority Area. Historic England commented that**

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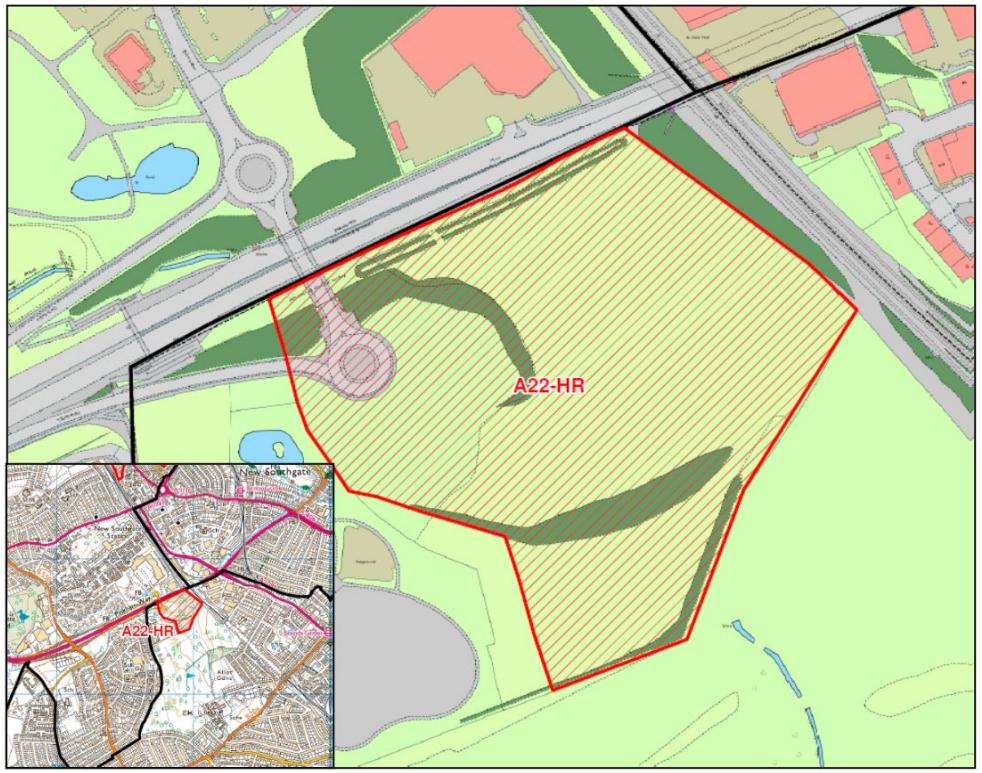
			there is potential for archaeological remains to be present and that further assessment should be undertaken.
MM113		Appendix 2: Haringey Area Profiles	A22-HR Pinkham Way **A22-HR – Friern Barnet Sewage Works (LEA 4)/ Pinkham Way, Haringey**  © Crown Copyright and database right (2016). Ordnance Survey 100021551

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Area Details	
Borough	Haringey
Type of Location	Area
Location Reference	A22-HR – Friern Barnet Sewage Works (LEA 4) /Pinkham Way
Size	5.95ha
Area Description	Land is currently unused and has become over grown with trees and vegetation.
Description of surrounding uses	Pinkham Way and retail park to north, industrial properties east. Golf course south and a park and residential properties to the west.
Planning Information	
Planning Designation	The Area is designated a Local Employment Area (LEA) and a Borough SINC.
Relevant Local Plan Policy	**Former Friern Barnet Sewage Works / Pinkham Way Area has the following planning designations on the site: Site of Importance for Nature Conservation Grade 1, Local Employment Area: Employment Land, Flood Zone 2 and 3 (part).** **The area is subject to the following key Local Plan policies: - SP13: Open Space and Biodiversity, DM 20: Open Space and Green Grid, SP8: Employment, DM 37: Maximising the Use of Employment Land and Floorspace, and DM 24: Managing and Reducing Flood Risk.** ~~The Area is subject to Local Plan policy SP8: Employment. Friern Barnet site falls within the Borough's Specific Proposal 5, Employment generating uses subject to no adverse effect on the nature conservation value of the site.~~

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				~~The area is subject to policy SP13: Open Space and Biodiversity. Friern Barnet is allocated as Borough Grade 1 SINC, and for employment uses in the Local Plan.~~
			Land Use	
			Co-location	This Area would allow for co-location with complementary activities due to its size and highway accessibility.
			Major New Developments	None identified locally
			Decentralised Energy Network	The Enfield potential Decentralised Energy area lies approximately 65m northeast of Friern Barnet. Not considered to be a practical option due to distance from potential users. Friern Barnet is in an area of low energy consumption (as ~~site~~ **Area** undeveloped). Areas northeast, east and west of ~~site~~ **Area** are high energy consumption zones.
			Details of in-situ infrastructure	None identified
			Constraints	
			Flood Risk	~~North boundary and northeast corner of the area is within Flood Zone 2 (medium probability of flooding).~~ ~~Any development on the area will increase impermeable surfaces and therefore increases surface water runoff which would need to be managed. It is understood that historical use of the area may have left contamination. It is unknown whether or not this previous use has an impact on the quality of groundwater. This could be ascertained through any planning application which may offer the opportunity to provide appropriate remediation.~~ **The** ~~site~~ **Area is largely within Flood Zone 1 with an area to the north of the** ~~site~~ **Area falling partially within Flood Zones 2 and 3. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report**

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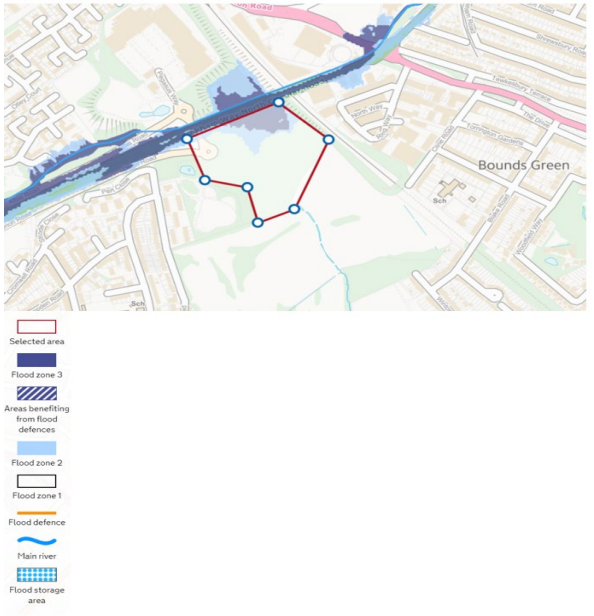
				and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable. **Part of the ~~site~~ Area is shown to flood from the Bounds Green Brook in the 1% AEP event (without defences) and this will potentially increase in the future as a result of climate change with 1% AEP event covering a greater extent of the site Area.** **A site specific flood risk assessment will therefore be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.** [updated map] 

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Surface and Groundwater	Not within a Source Protection Zone or ~~principle~~ **principal** aquifer. Bounds Green Brook lies approximately 40m north of ~~site~~ **Area**. A pond lies approximately 10m west of ~~site~~ **Area** and unnamed water course lies approximately 20m south of ~~site~~ **Area**.
Land Instability	The Environment Agency records historic landfilling in the area. This may represent a ground stability issue and as such further investigation will be required at the planning application stage.
Sensitive Receptors (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Residential properties lie west of Friern Barnet. Given the scale of the area there is scope to create a buffer around any waste management facility and orientate the facility away from residents.
Nature Conservation	Area is within a Borough Site of Importance for Nature Conservation which includes the adjacent Park and Golf Club. A number of ecology surveys have been undertaken and identified habitat of "potential value to a number of protected and notable species". **There is an ecological corridor to the east of the area along the railway embankment.** Japanese Knotweed and Giant Hogweed have been identified in abundance across ~~site~~ **Area**. There is currently no active management of the SINC.
Green Belt and Open Space	Land adjacent to the south and west of the area is designated as Metropolitan Open Land.
Historic Environment	No features identified
Highways	The Area would require the creation of an access to the roundabout on Orion Road/Pegasus Way. This would need to be designed to allow HGVs and refuse vehicles. The existing roundabout is suitable for these movements. Access to the North Circular is relatively easy from either Orion Road [heading east] or from Pegasus Way [to head west]. The Colney Hatch Lane/North Circular Road junction suffers from congestion at peak times. Use of the ~~site~~ **Area** for waste would add to HGV/refuse vehicle movement but is unlikely to have a significant impact on the

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				operation of this junction, based on 60 in/out movements per day for refuse vehicles plus 40 bulk transport in/out movements.
			Conclusion	
			Potential Uses	~~Integrated resource recovery facilities/resource parks, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment~~ Waste transfer, ~~processing and~~ **R**~~r~~ecycling, ~~indoor c~~**C**omposting, **including indoor** in-vessel composting and outdoor composting. ~~Thermal Treatment facilities may be viable but should only be considered if a combined heat and power facility could be incorporated into the facility and linked up to a district heating system.~~ Areas not lying within Flood Zone 3 are potentially suitable to handle hazardous waste.
			Uses unlikely to be suitable	N/A
			Potential mitigation measures	**The Area covers land owned separately by the North London Waste Authority and the London Borough of Barnet.** There are a number of **policy**, environmental and amenity issues facing this area, although it previously accommodated a sewage treatment works. **The Area** has revegetated, contains a number of mature trees and is designated as a SINC. **Due to the number of designations affecting this Area, only a proportion of the overall area will be suitable for development. Given the land is in two ownerships and Barnet has no current plans to develop a waste facility, this is likely to impact on the deliverability of the site in its entirety. A smaller part of the site area in NLWA's single ownership is therefore most likely to accommodate any development. The location of new development within the Area will be assessed against flood risk criteria in the NPPF and a site-specific flood risk assessment will be required. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where**

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				development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. **Given the constraints on the Area, the site footprint should be minimised, taking into account the necessary operational elements of a waste facility, for example space for turning and parking for waste vehicles, processing area with sufficient room for equipment for waste treatment, and areas for the storage and stockpiling of materials. This should be on level areas where feasible.** **The location of new development should take the opportunity to create an appropriate buffer zone between the proposed facility and nearby sensitive receptors, including residential properties.** **Any new waste facility in this Preferred Location will need to be in line with the Haringey's Local Plan and the London Plan. There are community concerns around the development of a waste facility within this Area and how this will affect the natural environment, flood risk and biodiversity in the Area. Specific policy considerations on this topic are set out below. Consultation with the local community will be required for any proposed waste facility on this site.** **In line with London Plan policy G6: 'Biodiversity and access to nature', development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. In line with London Plan policy G7: 'Trees and Woodland', development proposals should ensure that, wherever possible, existing trees of value are retained.**

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				In line with Local Plan policy DM19: 'Nature Conservation', development proposals should protect and enhance the nature conservation value of the area. Development that has a direct or indirect adverse impact upon important ecological assets will only be permitted where the harm cannot be reasonably avoided and it has been suitably demonstrated that appropriate mitigation can address the harm caused. **In line with London Plan Policy G6D, any development needs to achieve biodiversity net gain that leaves the biodiversity in a better state than before the development. This should be outside the areas at risk of flooding (Zone 2 and 3), suitably buffered from the ecological corridor to the east of the area, and subject to up-to-date Biodiversity and Wildlife surveys, be on land that is not identified as having priority species or habitats.** **An appropriate ecological survey will be required to identify significant ecological features to retain or replace. Consideration should be given to the retention and protection of existing mature trees and the designation and management of appropriate areas of habitat to be retained and enhanced.** **Mitigation measures should include continued habitat connectivity with the adjacent green spaces and ecological corridor along the railway embankment that needs to be retained and enhanced.** ~~Incorporating appropriate boundary treatments / landscaping, protecting existing green infrastructure features, undertaking appropriate ecological surveys and creating replacement habitat are likely to be important mitigation measures~~.

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				In line with Local Plan policy DM21: 'Sustainable Design, Layout and Construction', buildings within the development should be designed to complement nature conservation by maximising opportunities to enhance biodiversity, including through appropriate landscaping, Sustainable Drainage Systems, living roofs and green walls. Mitigation measures would be required to protect the amenity of sensitive receptors including hours of working, noise and odour suppression. ~~Consideration should also be given to the creation of an appropriate buffer between waste management facility and nearby sensitive receptors.~~ Provision of an acceptable access ~~of~~ **from** Orion Road Roundabout would be required. **Any application should demonstrate how public access to the remainder of the Area could be achieved.** **The Muswell Hill Golf Course Brook runs in culvert through the Pinkham Way Priority Area. Opening up the watercourse could bring multiple flood risk, biodiversity and amenity benefits and should be given consideration as site-specific development proposals are advanced.** **Any application will need to have regard to the needs of different users of the Area to ensure the safe operation of the waste management facility.** A contamination and ground stability appraisal would be required to assess potential impacts from the historic landfill within the Area boundary.

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				As parts of the Area **fall within flood Zone 2 and 3** ~~are at a medium risk of flooding~~, the completion of a suitable Flood Risk Assessment and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures. **Any necessary SuDS should be designed to integrate with other nature conservation elements.** ~~For any proposed development which involves an increase in built footprint within the modelled extent of the 1 in 100 chance in any year flood event, taking the impacts of climate change into account, or where the footprint has been moved into a deeper area of floodplain than the existing built footprint, floodplain compensation will need to be provided on a volume for volume and level for level basis.~~
MM114		Appendix 2: Waltham Forest Area Profiles	A24-WF Argall Avenue	
			Historic Environment	~~No assets identified in vicinity.~~ **Within the River Lea and Tributaries Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.**
			Flood Risk	~~The north of the area lies with Flood Zone 2 and 3 (medium to highest probability of flooding) with the southern tip lying within Zone 2. A flood storage area lies adjacent to the east of the northeast corner of the area.~~ ~~Facilities within Flood Zone 3 should only deal with inert waste unless otherwise agreed with the Environment Agency.~~ **The site area falls partially within Flood Zone 1, Flood Zone 2 and Flood Zone 3. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential**

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				Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable. **However, development should be avoided on the part of the site area which lies within the functional floodplain.** **The site area is shown to flood from the River Lee and Dagenham Brook in the 1% AEP event (without defences) and this will potentially increase with the future as a result of climate change with 1% AEP event covering a greater extent of the site area.** **A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.** **For any proposed development which involves an increase in built footprint within the modelled extent of the 1 in 100 chance in any year flood event, taking the impacts of climate change into account, or where the footprint has been moved into a deeper area of floodplain than the existing built footprint, floodplain compensation will need to be provided on a volume-for-volume and level-for-level basis.**

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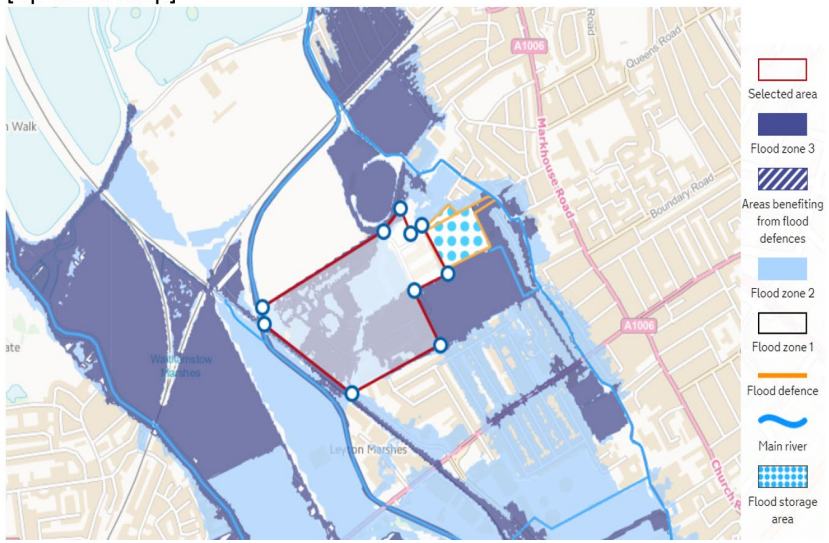
			[updated map] 
MM115		Appendix 2: Waltham Forest LLDC Area Profiles	LLDC3-WF Temple Mill Lane **Historic Environment** — ~~No assets identified in vicinity~~. **Within the River Lea and Tributaries Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.** **Flood Risk** — ~~The majority of the site lies within Flood Zone 3 (highest probability of flooding). Parts of the eastern half of the area lie within Flood Zone 2 (medium probability of flooding).~~ ~~Environment Agency – Facilities within Flood Zone 3 should only deal with inert waste unless otherwise agreed with the Environment Agency.~~

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				The site area is largely Flood Zone 2 with a small area of Flood Zone3. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable. **The site area is shown to flood from the River Lee and Dagenham Brook in the 1% AEP event (without defences) and this will potentially increase with the future as a result of climate change with 1% AEP event covering a greater extent of the site area.** **A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.** **For any proposed development which involves an increase in built footprint within the modelled extent of the 1 in 100 chance in any year flood event, taking the impacts of climate change into account, or where the footprint has been moved into a deeper area of floodplain than the existing built footprint, floodplain compensation will need to be provided on a volume-for-volume and level-for-level basis.**

Ref	Page	Policy/ Paragraph	Main Modification
			[updated map]