

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

1. Issues under consideration

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

2. Recommendations

Regulatory Committee is recommended to:

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

3. Alternative options considered

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

4. Background

What is the NLWP?

- 4.1 The seven North London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest are working together to produce the North London Waste Plan ('NLWP'). The NLWP will cover the period 2017 to 2032 and, once adopted, it will form part of the statutory Development Plan for these areas.
- 4.2 The purpose of the NLWP is firstly to ensure there will be adequate provision of suitable land to accommodate waste management facilities of the right type, in the right place and at the right time up to 2032 to manage waste generated in North London; and secondly to provide policies against which planning applications for waste development will be assessed, alongside other relevant planning policies/guidance.

Consultation

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

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

Results of consolation

4.7 There was general support for the draft aims, objectives and spatial strategy of the NLWP. Some textual changes were suggested including a stronger commitment to achieving net self-sufficiency.

4.8 The preferred approach for the Plan including maximised recycling and net self-sufficiently in a number of waste streams was on the whole supported by those in the field of waste planning. More information on the management and export for each type of waste was requested, particularly Construction, Demolitions & Excavation waste and hazardous waste. It was also suggested that this section include more information about how the NLWP is reducing exports to landfill.

4.9 Around 70% (148) of the comments received were objections to sites and areas. The methodology for identifying new sites and areas was broadly supported. However a number of proposed sites and areas which have been assessed as potentially suitable for waste uses through the NLWP assessment criteria were not considered suitable by local residents and community groups. The main issues raised by residents related to the potential negative impacts of a waste facility in the local area, including traffic/congestion, suitability of roads and access, effect on biodiversity, flood risk, proximity to sensitive receptors and residential areas, concern over noise, smell, pollution, vermin etc. A number of objections by landowners and tenants were also received.

4.10 There was broad support for the policy setting assessment criteria for waste management facilities although a number of changes were suggested to strengthen requirements or for clarification. Competing views were received from residents who want strict controls on development alongside ambitious objectives, and the waste industry who consider some of the requirements in the policy too onerous.

4.11 There was strong support for the policy safeguarding existing sites. It was suggested that this policy could include expansions to existing facilities. There was general support for improving coverage of Re-use & Recycling Centres across North London with some suggestions about how the policy could be improved. New policies were suggested about incorporating recycling facilities in new development, waste water and landfill/landraising.

What has been changed?

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

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

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

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

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

What is in plan?

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

Existing sites

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

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

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

Targets

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

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

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

Capacity gap

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

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

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

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

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

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

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

New sites and areas

- 4.28 The NLWP identifies both sites and areas to meet future waste needs and these have equal status in the delivery of the NLWP. A 'site' is an individual plot of land that will be safeguarded for waste use, whereas an 'area' comprises a number of individual plots of land, for example, an industrial estate or employment area that is in principle suitable for waste use but where land is not specifically safeguarded for waste.
- 4.29 The following sites and areas are included:
- Oakleigh Road, Barnet (3.1ha)
 - Brunswick Industrial Park, Barnet (3.9ha)
 - Mill Hill Industrial Estate, Barnet (0.9 ha)
 - Connaught Business Centre, Barnet (0.9 ha)
 - Replacement site(s) for BXC redevelopment, Barnet (size TBC)
 - Freezywater, Enfield (10.7ha)
 - Brimsdown, Enfield (134.4ha)

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

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

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

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

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

Policies

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

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

Consultation on proposed submission/ Rest of timetable

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

Next steps

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

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

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

4.37 Once the Plan is submitted, an independent Inspector will be appointed (on behalf of the Secretary of State) to examine whether the NLWP meets the required legal and soundness tests, including duty to co-operate and procedural requirements.

5. Contribution to strategic outcomes

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

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

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

7. Head of Legal Services and legal implications

7.1 The Council agreed a revised Memorandum of Understanding (MoU) about joint working on the NLWP in July 2015. This has been agreed and signed by all the other boroughs. The MoU sets out how the boroughs will cooperate to carry out the work will be carried out, makes Camden the lead borough and deals with financial matters and dispute resolution.

7.2 The boroughs will be consulting on the proposed submission NLWP under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

8. Use of Appendices

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

9. Local Government (Access to Information) Act 1985

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