

North London Waste Plan Matters, Issues and Questions Main Matter 2

Responses from North London Boroughs

B SOUNDNESS

Main Matter 2 – Aim and objectives for Waste Development

Issue: Whether the Aim and Strategic Objectives of the Plan are the most appropriate, are soundly based and provide an appropriate basis for meeting the future waste management needs sustainably.

12 Does the Plan adequately reflect future patterns of growth in plan area?

12.1 The Options Appraisal Report January 2019 (CD1/10), presents the modelled growth strategy options, the management strategy options and the capacity strategy options. The NLWP Strategy is based on the following:

- Planning for increasing arisings as defined by the Growth scenario in the Data Study (see Table 2 of the Data Study Part 2 (CD1/7) 2019)
- Planning to achieve the landfill diversion and performance levels as defined by the maximum recycling and recovery scenario in the Data Study (see Table 3 of CD1/7)
- Planning to provide capacity equivalent to the quantities of LACW, C&I and CD&E wastes forecast to arise over the Plan period (i.e. achieving net self-sufficiency).

12.2 Using this strategy, a further analysis on a single forecast was conducted to identify the amount of additional capacity that will be needed, the type of facilities required, when they are needed and the implications in terms of land requirements.

12.3 Section 8 of the CD1/7 summarises the indicative future waste management requirements for North London and the Data Study results informed the preparation of the Site and Area allocations. Table 1 of the Sites and Areas report 2019 (CD1/9) summarises the amount of land required, which comes to a total of 9 hectares and as stated in paragraph 4.47 of CD1/9, a total of 102.38ha has been identified as potentially being suitable for waste development within the area allocations across the plan area. The Plan therefore takes into consideration the future patterns of growth as assessed through the Data Studies, which is then taken into account to inform the area allocations.

13 Does the Plan cover everything necessary, as set out in the Framework, NPPW and PPG?

13.1 Yes, the Plan covers everything necessary as set out in the Framework, NPPW and PPG. This is stated in paragraph 1.6 of CD1/1.

14 Explain how the outcomes of the Sustainability Appraisal (SA) have informed the Aim and Strategic Objectives of the Plan to reflect the principles of sustainable development with particular regard to the mitigation of, and adaptation to, climate change and sustainable transport.

14.1 The SA Objectives are distinct from the Strategic Objectives of the Plan which are focused on specific outcomes relating to the provision of waste management capacity whereas the SA Objectives cover the wider perspective required by SA with respect to the social, economic and environmental impacts of the Plan.

14.2 Section 3.2 in the SA appraises the compatibility of the SA and NLWP objectives to assess whether the objectives of the NLWP are consistent with the principles of sustainable development. Table 8 within the SA provides the results of this and it concludes that the majority of the interactions identified between the objectives are positive and, as a result, the two sets of objectives are broadly compatible with each other.

14.3 There were no instances where it was considered that the objectives were potentially incompatible. Nevertheless, there are a number of instances where the relationship between the two sets of objectives is considered to be uncertain. For example, the NLWP objective of ensuring that there are sufficient suitable land available to meet North London's waste management needs would have an uncertain impact on a number of social and environmental SA objectives, as it is not certain whether any of these sites may have an impact on, for example, the character of townscapes or green infrastructure. Nevertheless, it is acknowledged that the Plan and the Development Management process should ensure that any such adverse impact is avoided or mitigated. It is also recognised that not identifying sufficient land for waste management facilities also has the potential to have adverse social, environmental and economic implications.

14.4 The SA Objectives reflect the principle of sustainable transport through the inclusion of specific objectives on sustainable transport and climate change as detailed below together with the assessment criteria.

Objective 3 - To promote sustainable modes of transport, reduce the need to travel and improve choice and use of more sustainable transport modes.

- Will the plan/proposal reduce overall transport distances for waste?
- Will it reduce waste-related car and lorry traffic and increase sustainable transport use?
- Will it reduce/increase road congestion?

Objective 8 - To adapt to, and reduce the impacts of, climate change.

- Will the plan/proposal help to reduce vulnerability to the impacts of climate change?

Objective 9 - To reduce contributions to climate change, promote energy efficiency and increase the use of energy from sustainable sources.

- Will the plan/proposal increase emissions of greenhouse gases from waste activities?
- Will it reduce emissions of greenhouse gases?
- Will it encourage the use and/or production of renewable energy?
- Will it reduce waste-related car and lorry traffic and increase sustainable transport use?
- Each of the Plan's Policies and Area Allocations were assessed against these objectives.

14.5 The detailed results of the SA are located in the appendices of the SA which provides a more detailed assessment of each of the Plan's policies and site allocations. A description of the measures envisaged concerning monitoring for each of these objectives is also located in Table 19 of the SA.

15 Does the Plan demonstrate that adequate consideration has been given to cross-boundary issues and strategic priorities? In particular, is the aim correct as some of the North London Boroughs will be partially reliant on areas beyond the plan area for the management of waste by landfill?

15.1 The Plan demonstrates that adequate consideration has been given to cross-boundary issues and strategic priorities in a number of ways.

15.2 The strategic priorities of the plan are set out in the Strategic Objectives SO1 – SO8. The Spatial Framework sets out how the NLWP will deliver the strategic objectives. The aim is for net self-sufficiency in LACW, C&I, C&D waste streams, and this is taken forward in Strategic Objective 3. The explanatory footnote makes it clear that "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.

15.3 Paragraphs 5.30-5.35 discuss the cross-boundary issues identified through duty to cooperate engagement. The statements of common ground include agreement on how these issues will be addressed. One of the main issues, namely the decline in landfill capacity, is a strategic issue which cannot be resolved by the NLWP alone. The North London Boroughs, through the London Waste Planning Forum, will continue to work with waste planning authorities in the wider south east to monitor the situation. Modifications to paras 5.31 and

5.32 are proposed to reflect the statements of common ground and clarify the issues related to landfill capacity and exports from North London as follows:

5.31 Engagement to date has identified a constraint to the continuation of waste exports to landfill from North London relating to the scheduled closure of landfill sites during the plan period. Details can be found in the paper, Exports to Landfill 2017-2035, on the NLWP website (www.nlwp.net), though the operation of some of these sites may be extended beyond their currently permitted end date. The destination of waste is largely dependent on market forces and therefore it is not possible to identify specific alternative destinations where North London's waste will go after the closure of landfill sites during the plan period. The boroughs will continue to monitor this information throughout the preparation of the NLWP, and after the NLWP is adopted as reflected in the monitoring framework in section 10.

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 both alternative destinations sites and adequate void space in London, South East and East of England for 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.

15.4 Modifications to para 5.34 are also proposed to clarify the position on hazardous waste exports as follows.

5.34 While the export of the majority of hazardous waste to the most appropriate specialist facilities is likely to continue, current data collection methods do not identify the hazardous waste facilities in question. No planning issues have been identified which will prevent North London's hazardous waste continuing to be managed at these specialist facilities. ~~However,~~ the boroughs will continue to monitor ~~engage with the Environment Agency and waste planning authorities in receipt of hazardous waste exports from North London and engage with recipient authorities when and if there are any substantial changes, including seeking to identify any constraints to the continued export of this waste. Should any constraints come to light, such as anticipated closure of a facility, the boroughs will seek to identify potential new destinations with capacity for managing~~

~~compensatory amounts. The North London Boroughs will pursue agreement on this matter with recipient waste planning authorities through a statement of common ground.~~

15.5 The aim does not specifically mention waste exports, however a proposed modification to SO3 seeks to address this point by including a reference to monitoring waste exports as part of the ongoing duty to co-operate (see Q16).

16 Is the aspiration for net self-sufficiency an appropriate strategy for all waste types, excluding excavation waste, and does the aim make it clear that this excludes excavation waste or should excavation waste be referred to in the aim/objectives?

16.1 Net self-sufficiency for all waste types, excluding excavation waste, is in line with the new London Plan. Since the drafting of the Proposed Submission NLWP, the new London Plan has introduced a target of 95% beneficial use for excavation waste. The North London Boroughs are proposing modifications to incorporate this target into the NLWP in the appropriate sections. It is therefore proposed to include excavation waste in the overall aim and SO3, as follows:

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”.

SO3. To plan for net self-sufficiency¹ 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

¹ 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.

17 Is it clear when the aim of net self-sufficiency for the waste streams identified is to be achieved and is this aim of the Plan adequately reflected in the Monitoring and Implementation section? In particular, paragraph 5.6 identifies that North London is a net exporter of waste. Therefore, how does the Plan, and over what period, move the management of waste from a position of net exporter to net self-sufficiency and how is this to be monitored?

17.1 The NLWP plans for North London to become net self-sufficient by 2026 in line with the new London Plan and the North London Boroughs are proposing a modification to 6.5 and 7.3 to make this clear.

6.5 The chosen approach for the NLWP following the option appraisal can be summarised as follows:

<p style="text-align: center;">Chosen Approach for planning for North London's waste Population/Economic Growth in line with London Plan forecasts + Maximising Recycling + Net self-sufficiency for LACW, and C&I and C&D by 2026 and C&D by 2035 (<u>including hazardous waste</u>) = Quantity of waste to be managed</p>
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7.3 Table 8 sets out the quantities of waste, by waste stream, which need to be managed within North London in order to meet the policy for net self-sufficiency target for LACW, ~~and C&I~~ and C&D waste by 2026 ~~and C&D waste by 2035~~, including hazardous waste.....

17.2 Table 7 estimates how much land will be needed for new facilities to achieve net self-sufficiency over the plan period and Table 8 sets out how much new waste management capacity is required in North London to achieve net self-sufficiency over the plan period. Both tables show requirements at five-yearly intervals and form part of the monitoring indicators to measure new capacity in line with need. Monitoring Indicator 6 is for the amount of waste exported to landfill so boroughs will be able to assess if the reduction in exports is in line with projections in Table 9. In order to demonstrate if the aim for net self-sufficiency is being met, Indicators 3, 4 and 5 monitor waste arisings in North London, the amount and type of new waste management capacity, and any loss of waste management capacity and subsequent re-provision.

18 Should the aim and objectives refer to waste imports and/or seek any reduction in waste imports taking into account the needs of neighbouring Councils?

18.1 The NLWP plans for net self-sufficiency. Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste generated in North London, while recognising that some imports and exports will continue. Therefore net self-sufficiency does not mean that the North London Boroughs will deal solely with their own

waste. This is also true of any other waste planning authority planning for net self-sufficiency and this position is accepted across the wider south east region and set out in the statements of common ground.

18.2 While it is desirable for waste to be treated as close as possible to its source in line with the proximity principle, the complexity of the waste management business poses challenges. Different types of waste require different types of management and facilities need to serve areas large enough to be economically viable. While it is easier to influence where local authority collected waste is managed, C&I, CD&E and hazardous waste streams are subject to commercial contracts and decisions which may take waste beyond the administrative boundary to be managed.

18.3 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. It is expected that facilities in North London will continue to manage waste from outside the area.

19 Is it clear which version of the London Plan is referred to in the strategic objectives and throughout the Plan?

19.1 At time of writing, the adopted London Plan is March 2016, however a draft new London Plan has been developing while the NLWP is being prepared. The latest version of the new draft London Plan (consolidated changes version) was published in July 2019 and the direction of travel for the new waste policies and targets are now known. The GLA will publish an 'Intend to Publish' version of the London Plan six weeks after receiving the Panel Report. This is likely to be in December 2019, after the NLWP public hearings. This version will then be considered by the London Assembly with publication expected by March 2020.

19.2 Given the advanced stage of the new London Plan it is prudent for the NLWP to incorporate new targets and policy approaches to ensure it isn't immediately out of date. Some of the targets have already been incorporated in the Proposed Submission NLWP to be in line with the Mayor's Environment Strategy which was published in May 2018, including 50% recycling of LACW by 2026 and 75% recycling of C&I waste by 2030. Modifications are proposed to incorporate targets which were published after the Proposed Submission NLWP was drafted, including the 95% beneficial use for excavation waste. Where relevant, modifications are also proposed to clarify which version of the London Plan is being referred to and by the time of adoption of the Plan, it will be possible to further update all London Plan references.

20 Is there a need to refer to conformity or otherwise with the emerging new London Plan as, this plan refers to a target of 2026 for net self-sufficiency in all waste streams excluding excavation waste?

20.1 The GLA have confirmed that the NLWP is in general conformity with both the current London Plan and the draft London Plan. Given the advanced stage of the new London Plan it is prudent for the NLWP to incorporate new targets and policy approaches to ensure it isn't immediately out of date. It should be noted that incorporating the new London Plan targets and policies does not change the overall planning approach to waste for North London set out in the NLWP. The Mayor's Environment Strategy (May 2018) introduced new recycling targets which superseded those in the London Plan. Therefore the Proposed Submission NLWP already planned for these targets of 65% recycling of municipal waste by 2030 achieved through 50% recycling of LACW by 2025 and 75% recycling of business waste by 2030. (See also Q17). Modifications are proposed to align the NLWP with the new London Plan.

21 How does S07 contribute to the sustainable transport of imported waste?

21.1 S07 does not distinguish between imported and exported waste and the objective is directed at supporting sustainable transport of waste and minimising the impact of all waste movements within North London. Waste is transported at collection and when transported for management or between management facilities. The main means of achieving this is through policy 5 and through 5g) and 5h) and related paragraphs 9.40, 9.41 and 9.42 in particular. Under 5g) developers will need to demonstrate that the scope for use of water and rail has been considered.

22 How do the objectives consider co-locational benefits?

22.1 The benefits of co-location, and the support of the NPPW for the principle, are set out in the Plan in section 4C of the Spatial Framework and in particular in 4.15. The main benefits are identified as the potential to minimise environmental impacts, take advantage of 'economies of scale', share infrastructure, existing networks (e.g. the rail and highway network) and skilled workforce. In addition the development of a more circular economy would result from co-location opportunities related to other industrial activities synergistic with waste management, for example the manufacturing of products from recycled materials. In 4D another of the benefits of co-location is identified as the provision of opportunities for decentralised heat and energy networks.

22.2 The Plan also says in 4.11 that in promoting a geographic spread of facilities across the plan area consistent with the principles of sustainable development, the NLWP seeks to weigh the positive effects of co-location and economies of scale with the negative effects of excessive concentration of waste facilities in any one area. Given the need to find this balance in the Plan, it is not considered necessary to amend the objectives to consider co-location.