

## **North London Waste Plan Matters, Issues and Questions Main Matter 3**

### **Responses from North London Boroughs**

#### **Main Matter 3 – Spatial Framework for Waste**

**Issue:** Whether the Spatial Framework for waste management is appropriate and is soundly based.

#### **23 Does the Spatial Framework adequately reflect the aim and objectives for waste development?**

23.1 Yes. As stated in paragraph 3.1 of the NLWP (CD/1), the plan objectives deliver the overarching aim of the NLWP. Paragraph 4.1 of CD/1 states that the spatial framework flows from the Plan's objectives.

23.2 Section 9 of the NLWP (CD1/1) outlines the policies of the NLWP. Underneath each policy box, it is stated how the different strategic objectives and the spatial framework principles are related and delivered by the policy that is referred to.

#### **24 Is the methodology/assessments used to calculate capacity gaps, amount of waste to be managed and land take requirements robust and clear and does it adequately take into account any potential future dampening factors on growth and forecasts in waste arisings?**

24.1 Whilst DEFRA's 2009 survey to obtain data from businesses in England on C&I waste arisings and management methods had been used in the waste data study report published in 2014, this was withdrawn on 9 February 2015, following which it was agreed that the method for calculating (C&I) waste arisings should be based on the approach set out in New Methodology to Estimate Waste Generation by the Commercial and Industrial Sector in England (DEFRA, published August 2014).

24.2 This approach uses data on C&I waste arisings from the Environment Agency Waste Data Interrogator (EA WDI) as the basis for calculating C&I waste arisings in the North London. The WDI holds detailed information on waste managed, including waste deposited and waste removed at all permitted sites with waste classified in 3 levels of detail both by European Waste Catalogue (EWC codes) and as Substance Orientated Classification. Data analysis at the most detailed level 3 was used to ensure that base data derived in terms of waste type and management route for modelling purposes was the most accurate and appropriate possible.

24.3 Data for the whole of England by origin is reviewed. This enables information to be gathered on the waste managed within the North London Sub-region as well as how much waste arose in the Sub-region and was managed elsewhere.

24.4 Details of C&I (trade waste) collected by the local authorities is taken separately from LACW data. Detailed explanation of the modelling of capacity gaps and underpinning assumptions is given in the Data Study Part 2 (CD1/7).

- The capacity available at all sites permitted to accept waste is summed
- The quantity of waste arisings and the proportion that is assumed to be recycled is estimated based on the Growth and Behaviour Modifiers;
- The available capacity is then subtracted from the forecast quantity of waste that will need to be managed and the resulting figure will indicate whether there is a gap or a surplus of capacity..

24.5 With regards to the dampening effect on growth factors, allowance for suppression of growth is built into the assessment as 3 growth scenarios are modelled in Data Study Part 2 (CD1/7): No growth, Minimised Growth (0.40% per annum) and Growth (0.81% per annum.).

24.6 These factors seek to reflect the effects of future economic activity, such as 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 proposed application for a Development Consent Order to enable them to develop and operate an Energy Recovery Facility (ERF) at the Edmonton EcoPark from 2026.

## **25 Should any reference be made to the waste forecasts and methodology used in the emerging new London Plan?**

25.1 The NLWP meets the waste targets, the apportionment targets and the identified waste arisings set out for household and commercial and industrial waste in the emerging new London Plan. Differences in methodology between NLWP and London Plan are set out in the Data Study and the differences are discussed in section 6 of Data Study 2 (CD1/7).

25.2 In para 5.17 of the Plan the two approaches used in the Waste Data Study for identifying and projecting C&I waste are set out.. The first is to use data from the Defra C&I Waste Survey 2009 in line with the London Plan to assess the management routes of North London's C&I waste. The second is to use the new method for calculating C&I waste as introduced following the withdrawal of the Defra C&I surveys which uses published data from the EA's WDI. While using and contrasting both methodologies, the Boroughs prefer a different methodology to the GLA for estimating the baseline arisings for C&I waste. However both the London Plan and the NLWP use the same methodology for estimating

growth in waste arisings both for C&I and CD&E (the GLA Economic employment projections by sector).

25.3. For LACW the Boroughs are using the projections done for NLWA by Eunomia.

25.4 The Mayor has stated that the NLWP is in general conformity with the London Plan. In his letter (at representation 30-20/24) he discusses the differences in forecasting C&I waste and concludes that the NLWP has clearly set out its ambition to meet apportionment targets:

The Mayor welcomes the NLWP's objective to exceed the pooled apportionment set out in the draft London Plan for North London Waste Plan authorities. However, the discrepancy that exists between the C&I waste forecasts for NLWP and the Draft New London Plan are noted. It is recognised that the difference in the waste forecasts between the NLWP and the Draft New London Plan for the year 2021 is approximately 300,000 tonnes. In the Task 1 report for London Plan Waste Forecasts and Apportionments 2017, at page 16, SLR (consultants) state that "Defra's 2009 C&IW survey remains the most robust and fit for purpose source of baseline waste data for London Plan forecasts." This is as the 2009 data set quantifies waste arisings for each of London's commercial and industrial sectors, which means the GLA can apply employment projections per sector to get more accurate projections for C&I waste arisings. This is particularly important as some industries are more waste producing than others. In contrast the Waste Data Interrogator (WDI) used by NLWP to forecast waste arisings doesn't allow for this sector specific analysis. While the Mayor recognises the discrepancy in waste forecasts it is noted and welcomed that the NLWP has clearly set out its ambition to meet the apportionment targets set out in the draft London Plan.

25.5 In the light of these comments, the Boroughs do not consider any further modifications to the Plan are required.

**26 Does the methodology/assessments utilise the latest data and could there be any 'over-inflation' in the outputs from the methodology? In particular, if Table 3 and paragraph 5.6 identify surplus capacity, and the same paragraph also refers to North London as being a net exporter, could there be an argument that the proposals for future waste facilities would result in over provision? If not, should there be more detailed explanation as to why this is not the case?**

26.1 The latest data available at the time that a the reports were compiled was for 2016.

26.2 The total capacity indicated in table shows in the order of 4.4 million tonnes included transfer facilities . Excluding transfer facilities total waste management capacity is 2,928,228 tonnes. Total capacity by type needs to be matched to arisings by waste category. Estimated waste arisings are categorised by both their source as arisings and the type of

facility needed to manage the waste. Transfer facilities are not included as a management type.

26.3 The modelling process calculates the total available capacity for particular types of waste management sites and matches this to the arisings which will need to be managed through these facilities. Extensive and detailed explanation of why there are capacity gaps is given in sections 3 & 4 of the Data Study Report Part 2 (CD1/7).

26.4 The 1.55million tonnes of waste capacity through Transfer facilities will still require waste management capacity to recycle, treat or dispose of the waste materials. About 0.8 m tonnes of capacity is classed as recycling sites in which the operations are mainly sorting and bulking, where both recycle and rejects will require further additional waste processing, treatment or disposal capacity. Almost 1.1 m tonnes of waste managed through North London sites are recorded as arising outside North London

26.5 It should also be noted that waste facilities are in practice limited by a daily capacity for waste storage and processing, which means that the theoretical capacity will rarely if ever be reached as facilities cannot practically be operated full time at maximum capacity.

**27 Should the Plan provide more data on waste imports and consider/identify the effect of imports on the aspiration of net self-sufficiency?**

27.1 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.

27.2 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.

27.3 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.

27.4 Regulation of imports is not possible under current legal position either through planning controls waste management permitting.

**28 How does the Plan reflect the proximity principle in relation to sustainable waste transport movements?**

28.1 Policy 2 of the NLWP seeks to provide opportunities to manage waste as close to its source as possible, in line with the proximity principle. In section 4 on the Spatial Framework, spatial principle 4B seeks a geographical spread of waste sites across North London, consistent with the principles of sustainable development. Spatial principle 4F supports sustainable modes of transport. Access to transport modes was part of the site assessment criteria discussed in section 8 and in policy 5g) developers need to account for how sustainable transport modes have been considered.

28.2 Figure 13 of the Plan shows a good spread of new areas whilst replacement sites must be within North London and re-use and recycling centres should be sited where they meet need and improve area coverage.

**29 Does/should the Plan consider opportunities for replacement capacity outside of the plan area?**

29.1 This is addressed in Exports to Landfill 2020-35 (January 2019) (CD1/13).

29.2 The Boroughs have estimated future exports to each area based on the assumption that recent proportions of waste exports to each area will continue. It is acknowledged that current trends may change in the future, however given the number of variables which could influence future patterns of waste flows, it is considered that this is a reasonable and proportionate approach.

29.3 A number of facilities to which the Boroughs' waste is presently taken for landfill will close during the NLWP plan period. The amount of waste affected by these closures has been identified. The Boroughs need to establish that there are alternative homes for this waste after the current landfill sites cease operation.

29.4 It is acknowledged that landfill capacity in the wider south east is declining and that destinations of waste is largely dependent on market forces. However, it can be shown that there are alternative sites and void space in the wider south east to take North London's waste in the short term after the closure of landfill sites 2020-2035. 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.

**30 In paragraph 4.11 is the phrase “Green Belt in the north, will be largely out of bounds” appropriate and overly constraining? Does this appropriately take into account the fact that a very special circumstance would be necessary to support waste development proposals in the Green Belt?**

30.1 The Boroughs agree that as worded, para 4.11 is overly constraining and propose a change as follows:

[...] In addition, some areas, 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 can be demonstrated justifying the use of Green Belt land.

**31 Should paragraphs 4.18 and 4.19 make any reference to the impact of decentralised heat and energy opportunities on climate change? Should any reference be made to the carbon dioxide emission objectives in the emerging new London Plan?**

31.1 The following changes are proposed to 4.18 to bring it in line with the emerging new London Plan

The NPPW recognises the benefits of co-location of waste facilities with end users of their energy outputs. The London Plan (March 2016) supports developments that contribute towards renewable energy generation and seeks opportunities for the development provision of combined heat and power systems and cooling provision of heat and power to surrounding consumers. The draft New London Plan (July 2019) 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.

**32 As the plan period is to 2035, should Table 3 also provide capacity to the end of the plan period as oppose to 2029 and therefore provide consistency with Table 6?**

32.1 Yes, a modification is proposed to update Table 3 and paragraph 5.5 ha as follows:.

5.5 Table 3 below shows the existing (2018) waste management facilities in North London by type 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 million tonnes per annum, reducing to around 3.8 million tonnes by ~~2035~~ as a result of known closure of some existing sites up to

2028. Figure 9 shows the location of the facilities represented in Table 3 and a full list is in Appendix 1.

	FacilityID	2018	2026	2029	<u>2035</u>
LACW only	Transfer stations (non-hazardous)	621,222	416,864	416,864	<u>416,864</u>
LACW only	Household Waste Recycling Site	100,204	100,204	100,204	<u>100,204</u>
LACW only	Composting	35,241	0	0	<u>0</u>
LACW only	Recycling (MRFS)	276,855	276,855	276,855	<u>276,855</u>
LACW only	Incineration with Energy Recovery	550,000	0	0	<u>0</u>
LACW and CI	Transfer stations (non-hazardous)	206,748	206,748	206,748	<u>206,748</u>
LACW and CI	Incineration with Energy Recovery	0	700,000	700,000	<u>700,000</u>
LACW, CI and CDE	Transfer stations (non-hazardous)	26,545	26,545	26,545	<u>26,545</u>
LACW, CI and CDE	Recycling (MRFS)	16,277	16,277	16,277	<u>16,277</u>
CI only	Transfer stations (non-hazardous)	288	288	288	<u>288</u>
CI only	Recycling (MRFS)	54,632	54,632	54,632	<u>54,632</u>
CI only	Treatment facility	2,332	2,332	2,332	<u>2,332</u>
CI only	Treatment facility (Hazardous)	64,132	64,132	64,132	<u>64,132</u>
CI and CDE	Transfer stations (non-hazardous)	236,245	119,050	119,050	<u>119,050</u>
CI and CDE	Recycling (MRFS)	432,538	432,538	432,538	<u>432,538</u>
CDE only	Transfer stations (construction & demolition)	364,097	328,014	328,014	<u>328,014</u>
CDE only	Recycling (aggregates, other C and D)	980,780	746,840	627,876	<u>627,876</u>
Hazardous	Transfer stations (hazardous)	5	5	5	<u>5</u>
Hazardous	Treatment facility (Hazardous)	3,622	3,622	3,622	<u>3,622</u>
CI Specialist	Treatment facility	112,419	112,419	112,419	<u>112,419</u>
CI Metals	Recycling (ELVs)	362	362	362	<u>362</u>
CI Metals	Recycling (Metals)	318,522	318,522	318,522	<u>318,522</u>
CI Metals	WEEE	18,657	18,657	18,657	<u>18,657</u>

**33 Is figure 6 ‘user friendly’ in terms of achieving a clear and coherent geographical representation? Paragraph 4.7 of the Plan refers to the fact that figure 6, which isn’t titled as such on the figure, shows existing waste sites. Although these are shown in the key, they are not shown on the map and neither is the area for Decentralised Energy Opportunity.**

33.1 It is accepted that Figure 6 would benefit from improvement and this is included within the proposed modifications.

**34 Is paragraph 5.13 clear as to why the Circular Economy Package recycling target of 65% for municipal waste (LACW and C&I) by 2030 has only been applied to C&I waste in the Plan? Is the effect of this target clearly identified in the Plan, or reasons as to why it has no effect clear? Does this target have any effect on the data contained within tables 6 to 9?**

34.1 A modifications is proposed to provide clarity to this area of the Plan.

The European Commission has put forward a Circular Economy Package<sup>1</sup>. 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 London Mayor's target is 65% recycling for municipal waste by 2030, comprising 50% for LACW by 2026 and up to 75% for C&I by 2030, and ~~These revised targets have~~ this target has 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 LACW projections of the NLWA at this time, as these already incorporate the 50% target .

**35 Paragraph 5.27 indicates that exports in LACW/C&I waste have been steadily declining in recent years. However, Table 4 shows a significant increase in waste exported for these waste streams between 2014 and 2016. Therefore, is paragraph 5.27 correct and should some explanation be provided as to why such increase occurred? Moreover, the increase in exports for this waste stream over the period 2014 to 2016 (against a steady decrease from 2011 to 2014) would appear to undermine the aspiration for net self-sufficiency unless there is some explanation identified for this or that there is planned response to reduce this exported tonnage.**

35.1 Overall, waste exports from North London to landfill have been declining in recent years, but there are different patterns for different waste streams. Arisings from each of the main categories of waste are calculated separately, as shown in revised table 4 (see below). LACW to landfill has reduced by 88% and C&D by 96% whilst C&I for year 2016 shows an increase in landfilled quantity. The data is not available to identify why C&I waste exports to landfill have increased.

35.2 Data in Table 4 is the best available on exports however, data on NL waste arisings are significantly higher than would be indicated by traceable exports. This indicates that data on exports in the Environment Agency WDI is not wholly reliable. Waste "imported" to NL transfer stations will be classed as NL origin when exported to site outside NL.

35.5 The output from the model from the scenario "Growth and Maximised Recycling" does show an increase in landfill requirements. The increase in landfill quantities reflect growth

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<sup>1</sup> European Commission Circular Economy Package [http://ec.europa.eu/environment/circular-economy/index\\_en.htm](http://ec.europa.eu/environment/circular-economy/index_en.htm)



factors applied to the model and is mainly seen in C&I waste arisings. The NLWP can only influence the requirement for export to landfill of C&I waste by making adequate provision for alternative treatment or recycling capacity. (Also see Q 39 re landfill)

35.3 Amendments are proposed to paragraph 5.27, Table 4 and figure 10 to clarify recent patterns of waste exports to landfill as follows:

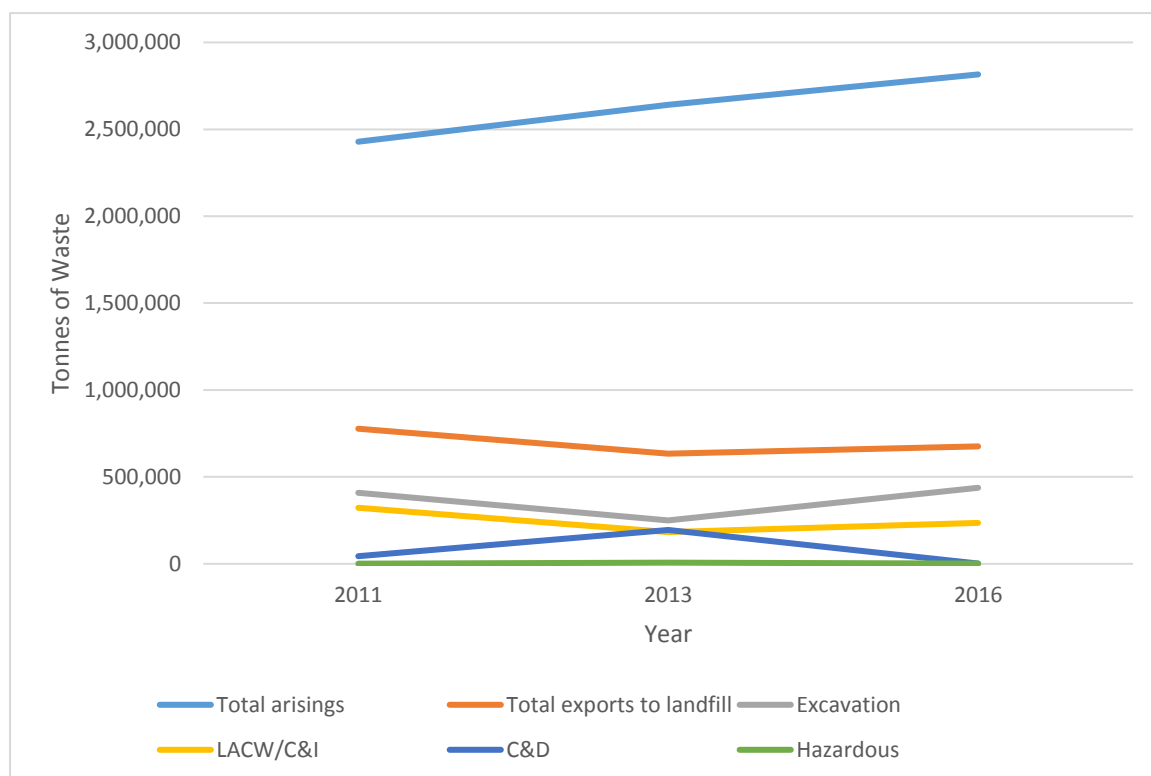
5.27 In 2016, 1,201,964 tonnes of waste was recorded as exported from North London, ~~56%~~ 675,788 tonnes of which went to landfill. Most of the waste deposited to landfill was excavation waste (65%) followed by LACW/C&I (35%). Exports of LACW to landfill in the LACW/C&I category have been steadily 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 (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.

Table 1: Waste recorded as exported from North London to landfill 2011-2016

<b>Type of Waste</b>	<b>2011</b>	<b>2013</b>	<b>2016</b>
Excavation	409,311	249,701	437,480
LACW/C&I	322,501	182,599	235,506
C&D	44,446	194,780	1,636
Hazardous (WDI)	929	6,727	1,166
Hazardous (HWDI)	6,524	7,449	8,568
Total exports to landfill	777,187	633,807	675,788
Total exports to all facilities	1,063,563	1,017,324	1,201,964
Total arisings	2,428,709	2,640,862	2,815,783

Source: Waste Data Interrogator (WDI) and Hazardous Waste Data Interrogator (HWDI)

**Figure 1: Waste recorded as exported from North London to landfill 2011-2016**



**36 In Table 4 should C&D waste be shown separately from Excavation (E) waste, particularly as C&D waste is subject to self-sufficiency aspirations and E waste is not?**

36.1 A modification is proposed to Table 4 to show separate figures for C&D and E waste. The modification is shown in Q35 above.

**37 Paragraph 5.22 indicates that 53,420 tonnes of hazardous waste was produced in 2016. The same paragraph indicates that 53,107 tonnes (99.4%) of this waste was exported out of North London for management. However, Table 4 shows that 10,352 tonnes of hazardous waste was exported in 2016. How is discrepancy explained and is the Plan robust in its approach to the future management of hazardous waste to achieve self-sufficiency?**

37.1 There are two sources of data for hazardous waste which are not consistent with each other. Data on Hazardous waste for the NLWP is taken primarily from the HWDI database, which is based on records provided by waste producers and is the more accurate of the two sources. This is the source for paragraph 5.22 which records 53,420 tonnes of hazardous waste was produced in 2016. While the HDWI is the more accurate source in terms of the amounts of hazardous waste, it does not record which individual sites the waste has been sent to. The WDI is the most useful source of information on the final destinations of hazardous waste for us in the duty to co-operate. ~~and so data on hazardous waste as managed at waste management sites is recorded in the WDI.~~ There is no precise correlation between the two methods of hazardous waste data recording. The Boroughs have used the

53,420 tonnes figure as the more reliable baseline figure. The data in table 4 is taken from the WDI in order to be consistent with the remaining data in the table. Modifications to table 4 (see Q35) mean that this table now records export specifically to landfill and the opportunity has been taken to include figures from the Hazardous Waste Data Interrogator as well as those from the WDI, with additional explanatory information in the supporting text.

37.2 The strategy for achieving net self-sufficiency is set out in the Provision for North London's Waste to 2032 in section 7.

37.3 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.

37.4 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 engage with the Environment Agency and waste planning authorities in receipt of hazardous waste from North London including seeking to identify any new constraints to the continued export of this waste.

37.5 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.

### **38 Are the land take requirements in Table 7 robust and should the Plan seek to provide opportunity to intensify capacity at existing sites by seeking more efficient use of land?**

38.1 The capacity gap figures in tonnage of waste have been converted to waste management land requirement using data from evidence gathered and evaluated on typical capacity and land take for each type of facility.

38.2 A modification to para 6.8 is proposed as follows:

Reference capacities are set out in the table below.

Reference Capacities for Land Take for New Waste Facilities

<u>Facility type</u>	<u>Assumed tonnes per hectare</u>
<u>Energy from waste (large scale)</u>	<u>165,000</u>
<u>Energy from waste (small scale)</u>	<u>50,000</u>
<u>Recycling (C+I &amp; LACW)</u>	<u>128,000</u>
<u>Recycling (C+D)</u>	<u>100,000</u>
<u>Recycling (specialised – eg. metals)</u>	<u>50,000</u>
<u>Recycling (Hazardous)</u>	<u>10,000</u>
<u>Re-use</u>	<u>15,000</u>
<u>Composting</u>	<u>25,000</u>

<u>Treatment plant</u>	<u>50,000</u>
<u>Treatment Plant (Hazardous)</u>	<u>10,000</u>

Table 20 in section 7 of the [Data Study Part 2 \(2019\)](#) available on the website ([www.nlwp.net](http://www.nlwp.net)) provides a fuller explanation.

38.3 In Data Study Part 2, table 19 shows that the reference capacities are based on evidence from ODPM, London Plan, West London Waste Plan, Worcestershire, Nottinghamshire, North Wales, Plymouth Bradford, Environment Agency and North London.

38.4 Policy 1 supports appropriate intensification of existing sites

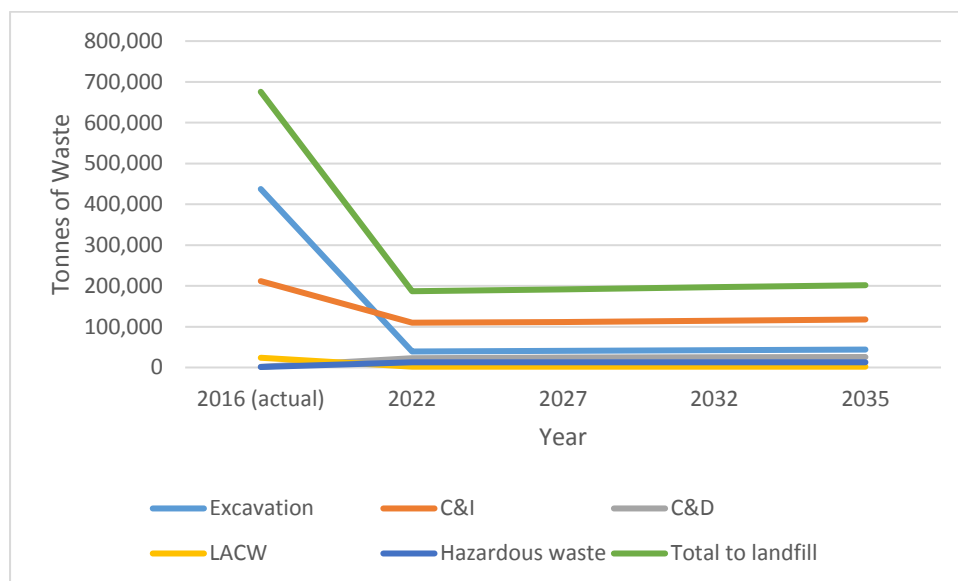
**39 Does the text of paragraph 7.18 conflict with the tonnages shown in Table 9? In particular, this paragraph indicates an anticipated decline in landfilling of North London’s waste over the plan period. However, Table 9 shows that the total projected exports to landfill from North London increases in each of the identified years to 2035. How is this conflict to be reconciled and evidenced? Is the statement in paragraph 7.18 that there are sufficient landfill sites available to take North London’s waste based on an anticipated decline in tonnage or does this cater for the increase in tonnage identified in Table 9?**

39.1 Paragraph 7.18 references Figure 12 as showing the anticipated decline in landfilling of North London waste over the plan period. An update to Table 9 and Figure 12 is proposed to take account of the new target for 95% beneficial use for excavation waste. The proposed changes to Table 9 and Figure 12 are as follows:

**Table 9: Projected exports from North London to landfill (tonnes) 2018-2035**

Waste Stream	<u>2016</u> <u>(actual)</u> <u>2018</u> <u>(tonnes)</u>	<u>2022</u> <u>(projected)</u> <u>(tonnes)</u>	<u>2027</u> <u>(projected)</u> <u>(tonnes)</u>	<u>2032</u> <u>(projected)</u> <u>(tonnes)</u>	<u>2035</u> <u>(projected)</u>
Excavation	<u>437,480</u> <u>405,634</u>	<u>39,226</u> <u>419,012</u>	<u>40,849</u> <u>436,356</u>	<u>42,540</u> <u>454,419</u>	<u>43,588</u> <u>465,613</u>
C&I	<u>211,636</u> <u>112,496</u>	109,868	111,666	114,569	117,392
C&D	<u>1,636</u> <u>22,521</u>	23,114	24,071	25,067	25,685
LACW	<u>23,869</u> <u>2,000</u>	2,000	2,000	2,000	2000
Hazardous waste	<u>1,166</u> <u>12,741</u>	12,741	12,741	12,741	12,741
Total to landfill	<u>675,788</u> <u>187,731</u>	<u>186,949</u> <u>566,735</u>	<u>191,327</u> <u>586,834</u>	<u>196,917</u> <u>608,796</u>	<u>201,406</u> <u>623,431</u>
<u>Beneficial use of excavation waste</u>	<u>367,661</u>	<u>379,786</u>	<u>395,507</u>	<u>411,879</u>	<u>422,025</u>

**Figure 22: Predicted Landfill Exports to Landfill as a % total Waste Stream.**



39.2 The definition of Beneficial Use in the draft London Plan is:

The placement of excavation waste to land in a way that:

- provides environmental benefits, particularly through the restoration of priority habitat, flood alleviation or climate change adaptation/mitigation; OR
- contributes towards the restoration of landfill sites and mineral workings while minimising adverse impacts to the environment or communities (for example transport, air quality and other considerations); AND
- demonstrating that the waste cannot be recycled or treated and managed in a more sustainable way.

39.3 The updated Figure 12 shows the anticipated decline in landfill at the beginning of the plan period. It is proposed to update para 7.18 to align it with the wording of the statements of common ground and para 5.31 and 5.32. The proposed modification is as follows:

7.18 The North London Boroughs have established that there are ~~landfill sites in London, South East and East of England~~ opportunities for the market to find alternative destinations in London, South East and East of England to take North London's waste between 2017 and 2035 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. See Figure 12 for the anticipated decline in landfilling of North London's waste over the plan period.

**40 Does the Plan adequately take into account the fact that existing landfill capacity outside of North London may also be taken up by other local authorities waste?**

40.1 This issue could be made clearer and changes are proposed to para 5.32 on the issue of landfill capacity as follows:

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 competition for, and shortage 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. There is opportunity for the market to find an ~~are both~~ alternative destination sites and adequate void space in London, South East and East of England for ~~to take~~ any of 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.

40.2 In addition to the above, SoCG agreed between North London and recipients of North London's waste include a commitment to monitoring waste exports and remaining landfill capacity (see section 'g' of SoCG in CD1/12 Appendix A).

40.3 Calculating remaining void space, depletion rates and need for new landfill capacity in the wider south east is complex work. The waste planning forums in the wider south east are each undertaking this work and are sharing their findings with each other. Inter-forum co-operation will help with future monitoring.

**41 Should C&D predicted waste arisings be related to construction activities as oppose to employment growth?**

41.1 Information of actual construction proposals is short term and very limited. Growth in line with economic activity as expressed by employment growth was selected as the best available growth option with supported data projections.

**42 Should the 95% target for beneficial use, as set out in the draft new London Plan be incorporated in the Plan?**

42.1 The 95% figure for beneficial use is included as a proposed modification to table 5

**Table 5: Recycling and Recovery Targets with 2016 Baseline**

Waste stream	Target	2016 baseline
LACW	50% recycling for LACW by 2025 (contributing to 65% recycling of municipal waste by 2030)	29%
C&I	75% recycling by 2030 (contributing to 65% recycling of municipal waste by 2030)	52%
C&D	95% <u>reuse/recycling/recovery</u> by 2020	50-60%
<u>Excavation</u>	<u>95% beneficial use</u>	<u>Not known</u>
Biodegradable or recyclable waste	Zero biodegradable or recyclable waste to landfill by 2026	Not known
<u>Hazardous</u>	<u>Included in LACW, C&amp;I and C&amp;D targets</u>	<u>N/A</u>

**43 Is it clear that the Spatial Framework appropriately reflects the relationship between existing population and population growth and future infrastructure provision in relation to likely future waste generation and the need for new facilities?**

43.1 The Data Study part 1(CD1/6) provided a detailed analysis of current waste arisings in North London for all waste streams and waste movements into and out of the area in 2011. This was updated in 2014, 2016 and 2018.

43.2 The information in Waste Data Study Part 1 (CD1/6) was used to inform Waste Data Study Part 2 (CD1/7). CD1/7 uses the data on current waste arisings, the latest capacity at existing sites and the preferred growth scenario (see Table 2 of CD1/7) and the maximum recycling and recovery scenario (see Table 3 of CD1/7) to provide projections for future waste arisings and management capacity in North London up until 2035.

43.3 The outcome of CD1/7 was that it presented future waste management requirements for North London and this is summarised in Section 8 of CD1/7. As outlined in Table 1 of the Sites and Areas report (CD1/9), the overall amount of land required to manage North London's Waste over the plan period is 9 hectares. These requirements were used to inform the spatial framework of the plan when it came to allocating areas to meet the required amount of hectares needed for new facilities.

**44 Does the Plan appropriately take into account future development allocations and strategies in Local Plans with regard to the future need, provision and location of waste facilities?**

44.1 Paragraph 1.7 of the NLWP states that the NLWP must be consistent with other documents in borough Local Plans. Through the Duty to Cooperate process, the North London Boroughs have worked closely together to ensure that the NLWP takes into account

future development allocations and strategies in Local Plans. As stated in paragraph 1.9, each of the seven boroughs has a strategic waste policy as part of their Local Plan. The boroughs' strategic waste policies defer to the NLWP to provide a more detailed planning framework for waste development across the seven boroughs.

44.2 In regard to the London Legacy Development Corporation, paragraph 1.16 of the Plan explains that a Memorandum of Understanding has been drawn up between the NLWP Boroughs and the London Legacy Development Corporation which identifies the Sites and Areas suitable for waste within the Hackney and Waltham Forest parts of the LLDC area. This is necessary as the NLWP is required to plan for the quantity of waste generated across the seven boroughs including the parts of Hackney and Waltham Forest that lie within the LLDC area, however the NLWP cannot directly allocate sites/areas within the LLDC area as this is the responsibility of the LLDC as the local planning authority.

44.3 As mentioned in paragraph 8.12, the regeneration of Brent Cross Cricklewood redevelopment (BXC) is likely to affect existing waste sites, comprising a NLWA transfer station and three commercial operations. 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. The existing facilities at BAR 6 and BAR 7 fall within the land required to deliver the first Southern phase of the BXC regeneration which 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.

44.4 In regard to the impact of Crossrail 2, only one location (A02-BA-Oakleigh Road) within an Area identified in Schedule 2 New locations for waste management has been identified in the Crossrail 2 safeguarding directions issued in January 2015. This plot of land (shown in Appendix 2) has been safeguarded in order to deliver part of the construction of Crossrail 2 and will be released after this is completed.

44.5 As demonstrated in Table 10 of the Plan, one of the screening criteria in the site and areas assessment is local plan designations, and therefore existing allocations were taken into consideration during the NLWP area allocation process. Paragraph 4.9 of the Plan states that the NLWP is underpinned by an aim to achieve net self-sufficiency for LACW, C&I, C&D waste streams, including hazardous waste. The objective is to reduce movements of waste, including waste exports, and increase the amount of waste managed in proximity to its source, in accordance with the principles of sustainable development. However, a balance is maintained, as future sensitive receptors and protection of local amenity have also been taken into consideration through the waste area/site allocation process. Therefore, the areas where future waste will be generated in the NLWP area have been taken into consideration and have informed the spatial distribution of areas/sites in the NLWP.



**45 Is paragraph 5.18 correct as the Environment Strategy (2108) is understood to aim for zero biodegradable waste to landfill by 2026 and not 2030?**

45.1 Modifications to 5.18 are proposed to update this and 65% recycling of London's municipal waste by 2030.

**46 Is the last sentence of paragraph 5.21 correct as the recycling target only applies to C&D waste and not excavation waste?**

46. A modification to para 5.21 is proposed to take account of the target of 95% beneficial use of excavation waste introduced in the draft new London Plan. The proposed modification is as follows:

5.21 Local planning policies and development industry practice mean a lot of C&D material is managed on site and does not enter the waste stream. A total of 443,180 tonnes of C&D waste and 747,243 tonnes of excavation waste was produced in North London in 2016. The largest proportion of C&D waste arising in North London is managed via recycling (73%) and treatment (20%) facilities, with 7% sent directly to landfill. Recycling rates of C&D waste are high due to the nature and value of the material. Excavation materials are primarily disposed of directly to landfill (53%) with the remainder managed through transfer stations (28%) or sent for treatment (19%). The draft new London Plan (July 2019) includes a target of 95% reuse/recycling/recovery of C&D C&E and 95% beneficial use of excavation waste by 2020.

**47 Should paragraph 5.26 be updated in the light of representations made by Thames Water?**

47.1 Yes. It is proposed to modify 5.26 along the lines put forward by Thames Water as follows:

5.26 Waste Water Treatment Works in North London are operated by Thames Water. The main Thames Water Waste Water/sewage treatment facility in North London is Deephams Sewage Treatment Works (STW), which is the ninth largest in England. The site is to be retained and improved for waste water use and planning permission has been granted for an upgrade to the effluent sewage sludge treatment stream. Thames Water anticipates that the recently ~~approved~~ constructed upgrade to Deephams STW will provide sufficient effluent treatment capacity to meet their needs into the next decade during the plan period. However, this will be reviewed in future AMP periods to ensure ongoing capacity in relation to population growth. Further details can be found in section 8.

**48 Does Table 8 sum correctly or is there some explanation that needs to be provided in relation to this matter?**

48.1 The difference between the estimated waste arisings and waste to be managed within North London, set out in Table 8, are excavation waste exports which are set out in Table 9. The reason for the gap is that Excavation waste is not included in the aim for net self-sufficiency.

**Table 8: Amount of waste to be managed within North London 2018-2035**

Waste Stream		2018 (tonnes)	2022 (tonnes)	2027 (tonnes)	2032 (tonnes)	2035
Estimated Waste arising		2,773,054	2,880,209	2,952,840	3,028,636	3,357,725
Net self-sufficiency	LACW	967,755	991,619	1,004,001	1,017,548	1,026,176
	C&I	774,768	800,321	833,451	867,949	889,332
	C&D	450,429	465,284	484,544	504,601	517,032
	Hazardous	53,421	53,421	53,421	53,421	53,421
Excavation		353,831	365,501	380,631	396,386	406,151
Agricultural		9,223	9,223	9,223	9,223	9,223