

North London Waste Plan Matters, Issues and Questions Main Matter 4

Responses from North London Boroughs

Main Matter 4 – Future Waste Management Requirements

Issue: Whether the future waste management requirements are justified by the evidence based.

49 Is the site and area search and selection process (methodology) clear, robust and justified?

49.1 Paragraph 8.21 provides clarification of the clear, robust and justified site and area search selection process.

49.2 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' available on the NLWP website. In summary it has involved the following key stages:

- i. Survey of existing waste sites – this involved a detailed review of the existing waste sites, including obtaining information from the operators on their future plans and validation of existing information held regarding their sites. This work indicated that there was insufficient capacity within existing sites to meet the expected waste arisings over the plan period.
- ii. Call for sites - a call for sites exercise was carried out in two stages. This included targeting existing operators, landowners and other interested parties requesting them to put sites forward for consideration.
- iii. Land availability search – this was an initial search into the land available in North London that may be suitable for the development of waste management infrastructure. At this stage, all available sites and areas were included in the process in order that the site assessment process for the NLWP could then be applied. The result of this work was to identify a long list of potential sites.
- iv. Desk based site and area assessment – the long list of sites and areas was then assessed against the selection criteria. As shown in Table 8 below, the assessment criteria were split into two levels, absolute criteria and screening criteria. The absolute criteria were applied first to determine if the identified constraints affected part of the proposed sites and areas, resulting in their removal. The remaining sites and areas were then subject to the screening criteria. The aim of using the absolute

criteria was to ensure that those sites/areas which are wholly unsuitable are excluded from further consideration and to identify those which may be suitable.

v. Site visits were undertaken in August and October 2014 to check and refine information from the desk based assessment and make a visual assessment of the suitability for different types of waste management facilities as well as the relationship with adjoining development. The information was used to complete the criteria-based assessment to ultimately determine the suitability of the sites/areas for future waste development as well as evaluate the potential facility types.

vi. Areas identified as suitable for future waste management facilities were subject to an assessment to calculate the level of capacity they could reasonably be expected to provide. Firstly the proportion of North London's industrial land in waste use was established. This showed the ability of waste facilities to compete with other land uses in these areas was good and that waste is a growing sector in contrast to declining industries such as manufacturing. Secondly, a review of the vacancy rates and business churn for industrial land was used to estimate the proportion of land within these areas which are likely to become available over the plan period. Further information is available in the Sites and Areas Report.

vii. Sustainability Appraisal and Habitats Regulation Assessment of sites/areas – all proposed sites have been subject to these assessments and the findings fed into the policy recommendations.

viii. Consultation with Landowners – Following completion of the above, land owners for all the sites remaining were contacted to seek feedback on the inclusion of their land as a waste site allocation. The findings of this work have further refined the list of sites and further information can be found in the Sites and Areas Report.

ix. Sequential test – any sites lying within a level 2 or 3 flood risk zone have been subject to sequential testing to assess the potential impact of a waste development in this zone. The results of this work can be found in the Sites and Areas Report

49.3 Within the SA, all proposed sites have been subject to these assessments and the findings fed into the policy recommendations.

50 Are facilities, existing and proposed, appropriately located in close proximity to waste sources, particularly as the Sustainability Appraisal identifies that some Boroughs are better equipped to deliver suitable waste sites than others?

50.1 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 the protected Green Belt in the north, will be largely out of bounds for any built waste facilities. 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. Any new waste development proposed in North London will be expected to be of a standard that is in keeping with and complements the existing and future planned development. By identifying suitable land across North London (Policy 2), the NLWP seeks to provide opportunities to manage waste as close to its source as possible, in line with the proximity principle. 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. All North London Boroughs want to play their part in managing north London's waste and therefore support an equitable geographical distribution across the seven Boroughs.

50.2 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 factors such as the character of different areas, changing land uses and availability of suitable industrial land. Where demand arises, opportunities to improve the spread of waste sites across the area are supported through Policy 3: Windfall Sites where they adhere to the site assessment criteria set out in section 8.

50.3 With local re-use and recycling centres (RRC) it is especially desirable to have a geographical spread that enables good access to residents. RRCs are facilities to which the public can bring household waste for free. Figure 7 shows the current network of local RRCs and a radius of two miles around them. Gaps in coverage have been identified by the NLWA in parts of the Plan area, namely Barnet and Enfield, shown outside of the two mile radius around each RRC. Any new RRC facilities will be assessed against Policy 4: Re-use and Recycling Centres.

51 Does the Plan provide sufficient guidance for the Boroughs to consider the implications of existing and future waste management facilities with regard to land use planning allocations and policy formulation within their Local Plans?

51.1 The Plan provides sufficient guidance for Boroughs in dealing with waste management issues in their Local Plans. The guidance falls into two main categories: the importance of

safeguarding existing waste management capacity and the identification and assessment of new waste management facilities.

51.2 Existing waste facilities are identified in Schedule 1 of the plan and are safeguarded under Policy 1. Boroughs will identify these on their policy maps when they next revise their Local Plans. There is a useful source of information for boroughs about each existing waste facilities in NLWP Data Study part 3. The importance of existing facilities is emphasised in spatial principle 4A of the Spatial Framework. Policy 1 safeguards existing waste facilities and allows for their expansion if other requirements of the NLWP can be met. If a site is redeveloped, then compensatory provision in North London needs to be provided. The principle of compensatory provision of maximum achievable throughput that the site has achieved sets the context for any redevelopment of that site or nearby. Policy 1 also sets out the agent of change principle so that any new development near an existing waste site must respect the existing waste use.

51.3 Boroughs will put the Schedule 2 areas of search into their policy maps when they next revise their Local Plans. Schedule 2 sets out the types of waste management facility that is potentially suitable within that area. Appendix 2 sets out for Boroughs the opportunities and constraints of each area which is supplemented by the Sites and Areas Report . Policy 3 sets out how windfall sites are to be assessed. The Plan sets out the need for waste facilities against which applications can be assessed and policy 5 sets out a range of criteria against which new waste management facilities are to be assessed.

52 Does the Plan identify existing and future areas of focus to enable the waste industry to deliver the facilities that are needed over the plan period relevant to the types of waste streams that need to be managed and the operational requirements of the respective waste management facilities?

52.1 There is a clear focus on the importance of keeping existing sites and protecting them from redevelopment in Policy 1. The introduction of the agent of change principle is designed to prevent the encroachment of sensitive development that might hinder the proper functioning of the plant. Under policy 1 encouragement is given to the expansion of existing facilities.

52.2 Sections 5 and 6 of the plan set out the results of the data study and provide the local waste context. Table 6 identifies the capacity gap in tonnage terms for broad waste treatment types under the chosen option . Investment in these types of facility would assist North London although under the principles of net self-sufficiency, comparable types of waste management will also help North London achieve a greater proportion of the equivalent of its waste arisings

52.3 The plan identifies areas of search for where new facilities might be located in Schedule 2. Schedule 2 indicates the suitability of the areas for certain waste management types. Appendix 2 has area profiles for each of the new areas indicating opportunities and constraints. Particular local factors that need to be taken into account are set out. Policy 3

sets out how the Boroughs will deal with applications that fall outside these new areas. Policy 5 sets out how the waste facilities will be assessed.

53 How does the Plan encourage co-locational waste management?

53.1 Co-location is identified as a key spatial principle of the Spatial framework. Spatial principle 4C is to encourage co-location of facilities and complementary activities. 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. The Lea Valley and the cluster of waste facilities around the Edmonton EcoPark are identified as one possible hub.

53.2 The plan promotes this through enabling the expansion of existing facilities under policy 1 and the identification of the new areas in policy 2 where complementary activities could be located. Windfall sites under policy 3 need to fit within the Spatial Framework which encourages co-location. Under Policy 6 co-locational benefits would include using the energy outputs from waste developments as a source of energy and heating for other developments.

53.3 The plan 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. This is considered within spatial principle 4B. Policy 5 o) deals with cumulative impact and is in line with advice in NPPW. Further considered is given para 9.51 to 9.53.