

STATEMENT OF COMMON GROUND

BETWEEN

THE NORTH LONDON BOROUGHS OF BARNET, CAMDEN, ENFIELD, HACKNEY, HARINGEY, ISLINGTON AND WALTHAM FOREST

AND

GBN SERVICES LTD

This Statement of Common Ground has been prepared to identify areas of agreement between the Boroughs working on the North London Waste Plan ("the North London Boroughs") and GBN Services Ltd. The North London Boroughs are Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. The Statement of Common Ground is on matters relating to GBN Service's representations on the Proposed Submission North London Waste Plan (2019) to assist the Inspector during the examination of the North London Waste Plan.

GBN representations

GBN's representations relate to updating the plan to reflect the redevelopment and consolidation of their sites.

GBN's representations are set out in full in Appendix A, alongside the section of the NLWP they refer to.

Areas of Agreement

The discharge of conditions for the planning permission for the Enfield site has been progressing since the Reg 19 version of the NLWP was agreed. The Environmental Permit process has been going on in the same time period. The Boroughs are now satisfied that the Enfield site provides compensatory provision for the Leyton site and that WAF 4 can be deleted and be replaced with the new site at Gibbs Road, Enfield into Appendix 1.

**Signed on behalf of the North London
Boroughs**

Signed:
Archie Onslow
Programme Manager, North London Waste
Plan
Date:

Signed on behalf of GBN Services

Signed:
Alexander Chalkin
Date: 08/10/2019



Appendix A: Representations from GBN Services Ltd

Code	Section	Policy / Para	Representation
11-1/1	Appendix 1	Schedule 1 Existing safeguarded waste sites in North London	<p>DWD are instructed by GBN Services Ltd (“GBN”) to review the proposed submission version of the North London Waste Plan (“NLWP”) and submit a response to the consultation where necessary. GBN is one of London’s largest waste management operators with 6 operational sites, 3 of which fall within the NLWP area across as many Boroughs; Barnet, Enfield and Waltham Forest.</p> <p>Having reviewed the NLWP we consider that GBN’s sites within the NLWP area are not accurately assessed and therefore we submit that the NLWP is not sound without the amendments described in this submission.</p> <p>GBN’s Position</p> <p>Within the NLWP area GBN operate 3 sites which will soon reduce to 2 following plans to consolidate operations (see later). The existing sites are at Railway Sidings, Oakleigh Road South, New Southgate (“Southgate”) within LB Barnet, Yard at Gibbs Road, Montagu Industrial Estate (“Gibbs Road”) within LB Enfield and Estate Way, Church Road, Leyton (“Leyton”) within LB Waltham Forest.</p> <p>In the near future GBN will be relocating the operations at Leyton to their new site at Gibbs Road to allow the Leyton site to be redeveloped for mixed use development including employment generating land uses that are more appropriate given the surrounding residential land use. Planning permission was granted at the Gibbs Road site for use as an inert waste management and recycling facility on 2nd March 2018 under application reference 17/00555/FUL; the EA issued a permit to operate the site in 13th August 2018 under reference EPR/FB3609LQ.</p> <p>GBN Southgate will continue to function as existing.</p>

Code	Section	Policy / Para	Representation
			<p>NLWP Evidence Base and GBN</p> <p>Data Study Part 3 Appendix 4 (“Part 3”) detailing the ‘Existing Waste Management Facilities in the London Borough of Barnet’ includes the Southgate site as “A11: Household, Commercial and Industrial Waste Treatment Station” under reference BAR 10. The types of waste assumed to be accepted are CDE at a licensed capacity of 75,000 tonnes.</p> <p>Part 3 detailing the ‘Existing Waste Management Facilities in the London Borough of Enfield’ includes the Gibbs Road site as “CDEW Processing” facility with a licensed capacity of 200,000 tonnes under reference ENF 37.</p> <p>Part 3 detailing the ‘Existing Waste Management Facilities in the London Borough of Waltham Forest’ includes the Leyton site as an “A11: Household, Commercial and Industrial Waste Treatment Station” under reference WAF 4. The types of waste assumed to be accepted are C&I. Details of the licensed capacity are noted as not available.</p> <p>Waste Data Study Part 2 ‘Waste Capacity in North London’ (revised and updated 2019) includes Table 6 which details of the existing annual handling capacity across the NLWP area. Presumably that table includes the details contained within the Borough specific reports at Part 3 Appendix 4.</p> <p>Preceding Table 6 is Table 4 which notes the ‘Reductions and Additions to Local Waste Management Capacity’. GBN’s Southgate and Gibbs Road sites are referred to within Table 4. With regards to Gibbs Road it is noted that it is a “new facility for recycling C&D waste, capacity 200,000t. Site to be operational end on 2018” and the notes regarding GBN Southgate serve to refine the proportion of waste recycled and reclassify the site accordingly.</p>

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			<p>NLWP Appendix 1 lists existing and safeguarded waste where Southgate is included as BAR10 and the Leyton site is included as WAF4. The site at Gibbs Road is not included within the NLWP at Appendix 1 despite it being included in the Part 3 Appendix 4 'Existing Waste Management Facilities in the London Borough of Enfield' under reference 'ENF 37'.</p> <p>Consultation Response</p> <p>The information within Part 3 of the Evidence Base pertaining to the use and tonnage at Southgate is accurate and the site is accurately represented within the NLWP thus no amendments are proposed.</p> <p>The information within Part 3 pertaining to the use at the Leyton site is partially accurate albeit incomplete. We can confirm that site has a licensed capacity for 75,000 tonnes. Furthermore, we can confirm that on average 98% of all outgoing waste is classified as 'recycling' under European Waste Catalogue ("EWC") codes R03, R04 and R05.</p> <p>The information within Part 3 pertaining to the tonnage at the Gibbs Road site is accurate and in addition we can confirm that the assumed waste streams are widened to include A11: Household, Commercial and Industrial in addition to Construction, Demolition and Excavation. For clarity, GBN Gibbs Road will absorb the Leyton operation and increase throughput with an additional 125,000 tonne capacity. It is anticipated that the outgoing waste streams will continue to fall under EWC codes for 'recycling' and that in the future the percentage of outgoing recycled material is increased from 98%.</p> <p>In response to the consultation on the NLWP we submit the following points:</p> <ul style="list-style-type: none"> • The Gibbs Road site should be included in Appendix 1 as ENF 37, as it appears so in the Data Study at Part 3 Appendix 4. This amendment will allow the NLWP to positively respond to the emerging London Plan which

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			<p>states at paragraph 9.8.8 that <i>“existing waste management sites should be clearly identified and safeguarded for waste use [my emphasis]”</i> under Policy S18 ‘Waste capacity and net waste self-sufficiency’;</p> <ul style="list-style-type: none"> • GBN has initiated a transfer of operations from Leyton to Gibbs Road and we therefore submit that the Leyton site (WAF4) is removed from Appendix 1; • Notwithstanding that the NLWP already takes account of the waste capacity at Gibbs Road, it does not take in to account the fact that the Leyton site will cease operation once the Gibbs Road site is operational in mid-2019. Furthermore, the evidence base does not take into account the full scope of waste streams accepted at Gibbs Road and seemingly does not take account of the amount of recycling undertaken. Consequently, the waste streams listed at Table 3 should be amended to omit the licensed capacity at GBN Leyton under CI waste stream and further amended to reflect the high output percentage (98%) of recycled material that will be undertaken at the Gibbs Road site where the 200,000t capacity should be split as follows: <ul style="list-style-type: none"> o 4,000t to CI and CDE waste stream under ‘Transfer stations (non-hazardous)’ o 196,000t to CI and CDE under ‘Recycling (MRFS)’.