

Main Matter 4 – Future Waste Management Requirements - Issue: Whether the future waste management requirements are justified by the evidence based.

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

1) Geographical Spread of Waste Sites

It is noted that in Section B of the Spatial Framework, the NLWP is underpinned by a spatial approach which seeks a geographical spread of waste sites across North London, consistent with the principles of sustainable development. On this basis, we would question why it is, therefore, that the NLWP has allocated a further four waste areas in LB Barnet, whilst other Boroughs such as Camden and Islington have no proposed allocated areas, especially considering both authorities have only one existing waste site each.

The proposed geographic spread of waste sites clearly contradicts with the NLWP's own objectives in attempting 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. With respect to the proposed Oakleigh Road South policy allocation, crucially, one notes that the Brunswick Industrial Park and Friern Barnet Pinkham Way allocations are located nearby, and so the Oakleigh Road South safeguarding does not increase the geographical spread of waste sites in North London.

We would request that the Inspector call into question the proposed allocation of Oakleigh Road South, given the approach followed by the planning authorities responsible for the new Plan, where there will evidently be a cluster of proposed waste sites within close proximity of one another. In our view, the allocation of potential waste sites and that waste should be apportioned rather more equitably across all of the local planning authorities. If the NLWP is to be adopted in its current form, the strategy will result in the majority of North London's waste being dealt with in Barnet and Enfield – contradicting, in our view, one of the NLWP's core objectives, whilst placing extra burden on the amenity of businesses and residents that reside in these areas.

2) Intensification

Notwithstanding the need to spread the geography of waste sites across the boundaries of the authorities' overall area, in our opinion, the NLWP needs to go further in promoting existing waste sites for intensification of waste uses, rather than placing emphasis on allocating new safeguarded areas for waste uses. Whilst we strongly agree with Policy 1 '*Existing waste management sites*' and its '*in-principle*' support for expansion or intensification of operations at existing waste sites, we note that only three existing sites are proposed to be expanded.

As can be seen by Figure 9 in the NLWP, there a number of existing waste sites in the Plan and we would query whether the stakeholders of the NLWP have targeted existing waste operators thoroughly enough, in order to promote the principles of expansion and intensification of waste uses on their sites. It is our assertion that this might not be the case. We note that Paragraph 8.3 states that two "call for sites" exercises were undertaken through the NLWP process and that only three existing sites were put forward; however, we would question whether this level of engagement was extensive enough. It is our opinion that the stakeholders of the NLWP should have directly targeted existing waste operators, promoting and incentivising the intensification and expansion of their sites, rather than allocating new waste areas in more sensitive locations, like Oakleigh Road South, which have the potential to negatively impact neighbouring amenity.

3) Suitability of the Oakleigh Road South Policy Allocation

We would invite the Inspector to query the appropriateness, suitability and deliverability of the Oakleigh Road South area for future waste uses.

Paragraph 8.14 of the NLWP directly references Oakleigh Road South and how it has been identified in the Crossrail 2 safeguarding directions issued in January 2015 to deliver part of the construction of Crossrail 2. On this basis, we would query whether the area should be allocated in the NLWP, given

that its deliverability for waste uses in the future is questionable and that there is a direct land use conflict with the aims and objectives of Crossrail 2.

We would bring to the attention of the Inspector the *Employment Land Review* conducted in 2017 by Barnet Council. This study informed the emerging Local Plan and also influenced draft London Plan Policy E7 '*Industrial intensification, co-location and substitution*', both of which promote flexibility of land uses within the Oakleigh Road South LSIS, including the potential of co-locating sensitive uses with industrial uses, such as residential. The ELR's recommendation for the LSIS was to "leave it to the market" to decide what land uses are suitable. As such, by allocating the site for future waste safeguarding, the policy is restrictive in its nature, directly conflicting with the Barnet's own evidence base and the GLA's future vision for LSIS in London, as it hinders the flexibility of achieving a range of land uses on site in the future.