

STATEMENT OF COMMON GROUND

BETWEEN

THE NORTH LONDON BOROUGHES

AND

MAYOR OF LONDON

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 the Mayor of London. The North London Boroughs are Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. The Statement of Common Ground is on matters relating to the Mayor of London’s representations on the Proposed Submission North London Waste Plan (2019) to assist the Inspector during the examination of the North London Waste Plan.

The Mayor of London’s representations

The Mayor of London’s representations relate to textual updating and clarification, in particular to reflect the draft new London Plan policies, but are not related to the soundness of the North London Waste Plan (NLWP).

The Mayor of London’s representations are set out in full in Appendix A, alongside the section of the NLWP they refer to.

Areas of Agreement

The proposed modifications to the Proposed Submission NLWP set out in Appendix B are sufficient to address the related points made by the Mayor of London in his representations.

Signed on behalf of the North London Boroughs



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

Signed on behalf of the Mayor of London



Signed:
Juliemma McLoughlin
Chief Planner
On behalf of Mayor of London
Date: 31/10/19

Appendix A: Representations from the Mayor of London

Code	Section	Policy / Para	Representation
30-1/24	1	1.7	Thank you for consulting the Mayor of London on the proposed submission version of the North London Waste Plan. As you are aware, all development plan documents must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to provide comments on the emerging Local Plan on his behalf. Transport for London (TfL) have provided comments, which I endorse, and are highlighted in this letter with detailed comments attached at Annex 1. The North London Waste Plan (NLWP) is in general conformity with both the current London Plan and the draft London Plan.
30-2/24	8	8.26	A more proactive and positive approach in the allocation of future waste sites is encouraged to support the strategic effectiveness of the NLWP. It is recognised that because the NLWP identifies broad areas for future waste management uses it isn't possible to allocate specific individual sites for future purposes and can only safeguard existing ones.
30-3/24	1	1.7	The Mayor published his draft London Plan for consultation on 1st December 2017 and the Minor Suggested Changes (following consultation) on 13 August 2018. The Examination in Public of the draft London Plan commenced on 15 January 2019 with publication anticipated in Winter 2019/20. Once published, the new London Plan will form part of the NLWP Authorities' Development Plans. The NLWP is required to be in general conformity with the current London Plan, however any policies that diverge from the draft London Plan will become out of date once the new London Plan is published and the draft London Plan gains more weight as it moves towards publication.
30-4/24	7	SP	The Mayor welcomes the ambition of the NLWP to exceed the apportionment targets for household and commercial & industrial waste set out in Table 9.2 of the draft new London Plan for each of the North London boroughs and is reflected in strategic objective SO3 at paragraph 3.4 of the NLWP. The Mayor is also supportive

Code	Section	Policy / Para	Representation
			of the NLWP ambition for net self-sufficiency for all waste streams (excluding excavation waste).
30-5/24	12	All	<p>It is noted that the waste plan is a highly technical piece of work, making it difficult, in some instances, to translate into a comprehensive and easy-to-follow report. The Mayor understands that individual data for the separate waste streams is difficult to unravel. The inclusion of a non-technical summary that pulls together the main points of all associated studies would be useful. This should include key headline data and be set out in a logical order that allows the reader to progress through the study from the evidence right through to proposed solutions and conclusions.</p> <p>When referring to the London Plan, it would be helpful to clarify if the reference relates to the current London Plan (2016) or the Draft New London Plan. For instance, Table 7 of the NLWP refers to the land take requirements needed to meet the apportionment set out in the London Plan, it is presumed that this refers to the draft London Plan as paragraph 6.16 of the Data Study 2 refers to the apportionments set out therein.</p>
30-6/24	10	10.7	<p>The Mayor welcomes the NLWP's identification of 13 areas totalling ~104ha that are suitable for new waste facilities to meet the identified capacity gap of 9ha in North London up until 2035. The Sites and Areas Report (2019) states that the NLWP is aiming to provide flexibility in terms of land availability by providing a range of areas suitable for waste. It is recognised that because the NLWP identifies broad areas for future waste management uses, it isn't possible to allocate specific individual sites for those future purposes and can only safeguard existing ones. In light of this, the NLWP should set out when and how waste uses will need to come forward to implement the plan, clearly identifying at what point in the 15-year plan period existing waste management capacity will be exceeded and when new sites will need to come forward. In addition, the NLWP could include a clear process for bringing new waste sites forward</p>

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30-7/24	3	3.4	<p>The following includes suggestions and other representations to clarify and improve upon some policy areas and to ensure the document is more aligned with the draft new London Plan.</p> <p>While the Mayor welcomes the ambition of Strategic Objective SO3 at paragraph 3.4 for the North London boroughs to be 100% net self-sufficient in the management of waste, please note that policy SI8 of the draft London Plan sets a target date of 2026 for net self-sufficiency within London for all waste streams excluding excavation waste.</p>
30-8/24	4	4.5	<p>Reference at paragraph 4.5 to the current London Plan Policy 5.17 is welcome. However, reference should also be made to the associated policies in the draft London Plan, which is currently progressing through examination and will form part of the development plans for all the North London Waste Plan authorities. Specific reference should be made to Policy SI8A(3) of the draft London Plan, which requires the capacity of existing waste management sites to be optimised.</p>
30-9/24	4	4.4	<p>The Mayor welcomes the spatial principles set out at paragraph 4.4 which includes:</p> <ul style="list-style-type: none"> • Make use of existing sites • Seek a broad distribution of waste sites in sustainable locations • Encourage co-location of facilities • Protect local amenity, and <p>Support sustainable modes of transport.</p>
30-10/24	4	4.14	<p>Making use of existing waste sites is a welcome approach, and the development of complementary waste management facilities on a single site is supported. In addition, Policy SI9B of the draft London Plan encourages existing waste facilities located in areas identified for non-waste development to be integrated with other uses as a first principle. However, further regard should be made to the guidance for industrial intensification on designated and non-designated sites as set out in the draft London Plan Policies E4-E7 that seek to optimise the use of industrial land and floorspace capacity. For clarification, while the co-location of industrial and non-</p>

Code	Section	Policy / Para	Representation
			industrial uses can be appropriate within Locally Significant Industrial Sites (LSIS) where this is supported in a local plan policy or considered as part of a co-ordinated masterplan, the co-location of non-industrial uses at Strategic Industrial Locations (SIL) is not supported as set out in draft London Plan policies E5D and E7. The NLWP should make this distinction clear in Section C and may wish to cross reference this as a footnote. Uses that are considered acceptable within SIL are listed in draft London Plan Policy E5C and NLWP should recognise and reflect these. In addition, the NLWP should note that of the seven partner boroughs, six are identified as 'retain capacity' boroughs and Enfield is identified as a 'provide capacity' borough for the management of industrial floorspace capacity as set out in the Draft New London Plan in Table 6.2.
30-11/24	4	4.8	The Mayor welcomes the NLWP's intention to seek opportunities to co-locate waste uses with other potentially compatible ones, but the plan should also aim to intensify capacity at existing sites by seeking the more efficient use of land, having regard to operational yard space requirements and also through exploring opportunities for multi-storey schemes and the addition of basements as set out in draft London Plan Policy E7.
30-12/24	4	4.18	The draft London Plan 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. Paragraph 4.18 of the NLWP should make reference that the Edmonton replacement EFW facility will need to meet this requirement. The Mayor has set ambitious recycling targets for all waste streams in draft London Plan Policy SI7. It is recommended that the NLWP make reference to these in paragraph 5.13, 5.18, and alongside the discussion of EU and national targets in paragraph 6.3 and Table 5.
30-13/24	5	5.18	The Mayor's Environment Strategy (2018) aims for zero biodegradable or recyclable waste to landfill by 2026 and not 2030 as stated at paragraph 5.18 of the NLWP. In addition, the aims of the London Environment Strategy are set in Policies SI7 and SI8 of the draft London Plan. Paragraph 5.18 should be amended accordingly.

Code	Section	Policy / Para	Representation
30-14/24	6	6.5	The Mayor welcomes at paragraph 6.5 the NLWP's chosen approach (preferred option) to plan for the management of growth so that they are aligned with the forecasts set out in the draft London Plan. As well as the decision to plan for maximised recycling and the identification of the need for additional recycling facilities to meet recycling targets set for construction and demolition waste, and local authority collected waste.
30-15/24	6	6.8	Paragraph 6.8 states that the capacity gap figures in tonnage of waste have been converted to a waste management land requirement in hectares. An explanation of the approach taken to this conversion would be helpful here. Particularly as the NLWP directs to the Data Study (2018) for further information, however it is not clear which document or where this information can be found.
30-16/24	8	8.11	Policy 1 states that compensatory capacity for any lost waste management site will be "delivered in line with the spatial framework on a suitable replacement site in North London...", and this is further emphasised in paragraph 9.7. However, paragraph 8.11 states that "it is known that some capacity will be lost during the plan period. Some of this capacity will be replaced within North London, some outside North London with a net loss to North London but not to London as a whole". Clarification on the intention of the NLWP is required.
30-17/24	8	8.12	The release of existing waste sites is best done through a plan led process, with compensatory capacity identified prior to the release of the site. It is noted that replacement capacity for the loss of a safeguarded waste site in the Brent Cross Cricklewood redevelopment have not been found as part of the NLWP. Paragraph 8.12 states that alternative sites/areas will be identified by the LB of Barnet by 2025 in line with the planning permission. The current London Plan is clear that if an existing waste management site is lost then additional compensatory capacity is required to be provided (Policy 5.17). This requirement is reiterated in Policy S19 in the draft London Plan, where the proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London. The NLWP should identify and safeguard suitable replacement sites, or at least clearly

Code	Section	Policy / Para	Representation
			identify how replacement capacity will be found and secured. The replacement site/s must at least meet, and is encouraged to exceed, the maximum achievable throughput of the lost sites. In addition, it is important that the site (S01-BA) identified to replace capacity at the Hendon Rail Transfer Facility is properly secured and safeguarded prior to the loss of the existing facility. Consideration must also be given to the comments from TfL regarding rail connectivity of the replacement site.
30-18/24	9	Policy 1	It should be noted at paragraph 9.10, that the agent of change principle not only relates to noise generation but is also about dust, vibration and other nuisance-generating activities. The NLWP should follow and reflect the guidance set out in Draft New London Plan Policy D12.
30-19/24	9	Policy 6	The NLWP should note at paragraph 9.61 that some existing waste sites lie adjacent to the Green Belt, especially those located within or close to the Lee Valley, such as at Edmonton Eco Park. Any future plans to redevelop the site, including the current plan for the Lee Valley Heat Network should ensure that the openness and permanence of the Green Belt is maintained in accordance with draft London Plan Policy G2.
30-20/24	5	5.17	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

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			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.
30-21/24	9	Policy 2	Policy 2 of the NLWP should set out the additional land requirement needed to manage waste over the plan period. It should also set out clearly when additional capacity is likely to be required at the point where the ability of existing waste management facilities is exceeded by waste generation.
30-22/24	6	6.4	Options Appraisal The objectives of the NLWP to manage waste over the plan period by applying a combination of options which include planning for growth; maximising recycling and aiming for net self-sufficiency for LACW, C&I, C&D and hazardous waste streams is welcomed by the Mayor.
30-23/24	9	Policy 2	Site Allocations Where identified sites/areas are located within Strategic Industrial Locations, the NLWP should recognise that co-location with non-industrial uses is considered to be unacceptable and does not accord with draft London Plan Policies E4 and E7 (see earlier comments). The NLWP should recognise and make it clear that the only acceptable uses within SIL are those listed in draft London Plan Policy E4. A development proposing the co-location of waste with residential uses may be acceptable within LSIS (see earlier comments) but it would not be considered acceptable within SIL and would not be in accordance with Policy E7 of the draft London Plan.
30-24/24	9	Policy 1 and Policy 2	In addition, as the North London boroughs bring forward their individual Local Plans existing safeguarded waste sites and areas suitable for future new waste management activities should be identified and illustrated clearly on policy maps and this should be made clear in Policy 1: Existing waste management sites and Policy 2: Locations for new waste management facilities.

Appendix B: Proposed Modifications

Section	Proposed change	Representation code
All	[In relation to London Plan, clarify if the reference relates to the current London Plan (2016) or the Draft New London Plan. Boroughs propose to wait until hearings to do this as new London Plan may change as result of Panel report due out in autumn 2019]	GLA 30-5/24
1.7	<p>Once adopted, the NLWP will form part of the ‘Development Plan’ for each of the North London Boroughs which comprises the London Plan⁴ and borough Local Plans (see Figure 2). The NLWP must be in general conformity with the London Plan, <u>which sets the strategic framework for the NLWP</u>, and consistent with other documents in borough Local Plans. The NLWP should be read alongside other relevant policies within the wider Development Plan. The Mayor published a draft London Plan for consultation in December 2017. The Examination in public is expected to begin in January <u>took place in early 2019 with adoption publication scheduled for early 2020.</u> The London Plan sets the strategic framework for the NLWP. <u>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 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. 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. Where relevant, the NLWP states which version of the London Plan is being referenced [footnote].</u></p>	GLA 30-5/24

Section	Proposed change	Representation code
	<p>Footnote: At time of writing this is The London Plan March 2016 <u>[footnote] The current adopted London Plan is referenced as the London Plan (March 2016), the London Plan (consolidated changes version) is referenced as the draft new London Plan (July 2019).</u></p>	
4.5	<p>NPPW requires Boroughs to consider the capacity of existing operational facilities in meeting identified need. Further to this, Policy 5.17 Waste Capacity of The London Plan policy <u>[footnote]</u> requires boroughs, when preparing plans, to protect and facilitate the maximum use of existing waste sites.</p> <p><u>[footnote] London Plan (March 2016) Policy 5.17: Waste Capacity and draft new London Plan (July 2019) Policy S18.</u></p>	GLA (Rep 30-8/24 and 30-11/24)
4.8	<p>Three existing sites are known to be planning capacity expansion or upgrades to existing facilities (see Section 8). Most other existing sites do not have any current plans to expand capacity or change their operations but the North London Boroughs support, in principle, the expansion or intensification of operations at existing facilities and this is reflected in Policy 1. <u>Further guidance for industrial intensification is set out in draft New London Plan Policies E4-E7.</u></p>	GLA (Rep 30-10/24)
4.11	<p>The current and changing character of each borough's industrial land is a consideration in identifying locations for new waste infrastructure. <u>It should be noted that the draft New London Plan identifies Enfield as a 'provide capacity' borough for the management of industrial floorspace capacity, and the other six North London Boroughs are identified as 'retain capacity' boroughs.</u> Larger and co-located facilities are more suited to areas with similar existing uses away from sensitive receptors. [...]</p>	GLA (Rep 30-10/24)
4.16	<p>There are also co-location opportunities related to other industrial activities synergistic with waste management, for example the manufacturing of products from recycled materials and the development of a more circular economy. Existing waste</p>	GLA (Reps 30-10/24)

Section	Proposed change	Representation code
	<p>facilities are already employing this approach as exemplified by the industries developing around the Edmonton EcoPark (Enfield) and the Plan seeks to build on the momentum by supporting this approach as a key element of the spatial framework and identifying which areas have potential for co-location. <u>Co-location of industrial and non-industrial uses at Strategic Industrial Locations (SIL) is not supported, in line with draft New London Plan policy E5.</u></p>	
4.18	<p>The NPPW recognises the benefits of co-location of waste facilities with end users of their energy outputs. The London Plan <u>(March 2016)</u> supports <u>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.</u> <u>The draft New London Plan (July 2019) Policy S18 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 S13 Part D1e).</u> <u>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.</u></p>	GLA (Rep 30-12/24)
4.25	<p>[...] North London currently has one rail linked waste site (at Hendon) supporting the requirements of the NLWA, however this site is due to be redeveloped as part of the Brent Cross Cricklewood regeneration project and the NLWA's need for this railhead has changed. <u>This is reflected in the new replacement waste transfer station (approved by Barnet Council in September 2018).</u> <u>A replacement rail based freight facility with a different function was approved as part of the Brent Cross Cricklewood permission granted under F/04687/13.</u> There is a planning application for replacement rail based depot with a different function under consideration. There is also a wharf</p>	GLA

Section	Proposed change	Representation code
	on the Lee Navigation which potentially could provide future opportunities for transportation by water at Edmonton EcoPark.	
5.11	The North London Boroughs and the NLWA are committed to achieving the 50% recycling target set out in the Joint Municipal Waste Management strategy and the <u>Mayor's Environment Strategy London Plan</u> . The North London Boroughs, together with the NLWA, are beginning a renewed drive to increase recycling including looking at ways to standardise collection regimes. In addition, the London Waste and Recycling Board (LWARB) works with London Boroughs to increase recycling rates and supports waste authorities in improving waste management services.	GLA 30-5/24
5.13	The European Commission has put forward a Circular Economy Package ² . This includes a 65% recycling target for municipal waste (LACW and C&I) by 2035 0 . Notwithstanding the UK leaving the EU, the UK has signed up to delivering these targets as part of Brexit. <u>The London Mayor's target is 65% recycling for municipal waste by 2030 and this</u> these revised targets have <u>has</u> 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 projections of the NLWA at this time.	GLA (Rep 30-12/24)
5.18	Through the London Environment Strategy, the Mayor is seeking to make London a zero waste city with no biodegradable or recyclable waste sent to landfill by <u>2026</u> 2030 and by aiming to achieve 65% recycling from London's municipal waste <u>by 2030</u> ; this will be achieved through a 50% recycling rate from LACW by 2025 (Policy 7.2.1) and 75% from business waste by 2030 (policy 7.2.2). The Mayor has also said that he does not expect there to be a need for any new energy from waste capacity if existing planned sites are completed (policy 7.3.2.b). The Mayor has also indicated that he will use his powers to ensure there are sufficient sites to manage London's waste. The Environment Strategy embraces the ideals of the Circular Economy requiring	GLA (Rep 30-13/24)

² European Commission Circular Economy Package http://ec.europa.eu/environment/circular-economy/index_en.htm

Section	Proposed change	Representation code																					
	manufacturers to design products to generate less waste and which can be easily repaired, reused and recycled, and the strategy encourages the development of business to facilitate this.																						
5.21	[...] The <u>draft New London Plan (July 2019)</u> includes a target of 95% <u>reuse/recycling/recovery of C&D waste</u> CD&E by 2020 and 95% beneficial use of <u>excavation waste</u> .	GLA 30-5/24																					
6.3 and Table 5	<p>The North London Boroughs have statutory duties to meet recycling and recovery targets and the NLWP will need to be ambitious in order to achieve European Union, national, regional and local targets. These targets <u>taken from the draft new London Plan (July 2019)</u> are as follows:</p> <p>Table 5: Recycling and Recovery Targets with 2016 Baseline</p> <table border="1" data-bbox="443 778 1568 1321"> <thead> <tr> <th data-bbox="443 778 723 834">Waste stream</th> <th data-bbox="723 778 1352 834">Target</th> <th data-bbox="1352 778 1568 834">2016 baseline</th> </tr> </thead> <tbody> <tr> <td data-bbox="443 834 723 959">LACW</td> <td data-bbox="723 834 1352 959">50% recycling for LACW by 2025 (contributing to 65% recycling of municipal waste by 2030)</td> <td data-bbox="1352 834 1568 959">29%</td> </tr> <tr> <td data-bbox="443 959 723 1075">C&I</td> <td data-bbox="723 959 1352 1075">75% recycling by 2030 (contributing to 65% recycling of municipal waste by 2030)</td> <td data-bbox="1352 959 1568 1075">52%</td> </tr> <tr> <td data-bbox="443 1075 723 1131">C&D</td> <td data-bbox="723 1075 1352 1131">95% <u>reuse/recycling/recovery</u> by 2020</td> <td data-bbox="1352 1075 1568 1131">50-60%</td> </tr> <tr> <td data-bbox="443 1131 723 1187"><u>Excavation</u></td> <td data-bbox="723 1131 1352 1187"><u>95% beneficial use</u></td> <td data-bbox="1352 1131 1568 1187"><u>Not known</u></td> </tr> <tr> <td data-bbox="443 1187 723 1267">Biodegradable or recyclable waste</td> <td data-bbox="723 1187 1352 1267">Zero biodegradable or recyclable waste to landfill by 2026</td> <td data-bbox="1352 1187 1568 1267">Not known</td> </tr> <tr> <td data-bbox="443 1267 723 1321"><u>Hazardous</u></td> <td data-bbox="723 1267 1352 1321"><u>Included in LACW, C&I and C&D targets</u></td> <td data-bbox="1352 1267 1568 1321"><u>N/A</u></td> </tr> </tbody> </table>	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&I and C&D targets</u>	<u>N/A</u>	GLA (Rep 30-12/24)
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6.4	In accordance with the NPPF (paragraph 35) to ensure the NLWP is justified, a range of options were tested as part of the consideration of reasonable alternatives for	GLA 30-5/24																					

Section	Proposed change	Representation code
	<p>managing North London’s waste leading to selection of the preferred strategy. The scenarios considered looked at a range of options for recycling from maintaining the status quo to seeking to maximise opportunities for recycling in line with the targets set out in Table 5 above, the latter option being the most popular option and taken forward. Along with this a number of options were also considered in relation to waste growth over the plan period and what impact that would have on waste growth, again 3 approaches were modelled looking at no growth, growth in line with the London Plan <u>(March 2016)</u> for C&I and CDE waste – with LACW growth being in line with that of the NLWA for all options, a minimised growth was also modelled but was not considered in line with the growth planned for in the London Plan <u>(March 2016)</u>, as such growth was modelled in line with the London Plan <u>(March 2016)</u>. An Options Appraisal Report (2018) has been prepared which provides more detail on each of the options considered and provides information on the different scenarios including how much waste would be generated over the plan period (incorporating economic and population growth assumptions), how much waste could be managed within North London (capacity strategy), and how this waste should be managed (management strategy) for each of the options considered. The preferred option identified in the Options Appraisal³ has been carried through to the NLWP. The preferred option seeks to achieve growth in line with the London Plan <u>(March 2016)</u> and to deliver the targets set out in the Mayor’s Environment Strategy.</p>	
6.5	<p>The chosen approach for the NLWP following the option appraisal can be summarised as follows:</p> <div data-bbox="443 1150 1568 1305" style="border: 1px solid black; background-color: #d9ead3; padding: 10px; text-align: center;"> <p>Chosen Approach for planning for North London’s waste Population/Economic Growth in line with London Plan forecasts + Maximising Recycling</p> </div>	GLA rep

³ Available on the NLWP website

Section	Proposed change	Representation code																																													
	<p style="text-align: center;">+ Net self-sufficiency for LACW, and C&I and C&D by 2026 and C&D by 2035 (including hazardous waste) = Quantity of waste to be managed</p>																																														
6.7	<p>Table 6 below sets out the capacity gap broken down in to 5 year periods over the NLWP plan period. The capacity gap is the difference between tonnage associated with existing and planned waste management capacity (see Table 3 – section 5) and the quantity of waste to be managed over the plan period (see the chosen approach set out above). This method identifies whether there is adequate or surplus capacity, or a requirement for additional facilities. Table 6 sets out the capacity gaps for each management route. Negative figures indicate a capacity gap and therefore the type of management route for which capacity is sought over the plan period. The boxes that are not highlighted denote where ‘surplus’ capacity exists.</p> <p>Table 6: Capacity gaps throughout the Plan period (tonnes) –chosen option</p> <table border="1" data-bbox="461 858 1568 1374"> <thead> <tr> <th data-bbox="461 858 898 938">Waste function and stream managed</th> <th data-bbox="898 858 1059 938">2018</th> <th data-bbox="1059 858 1227 938">2025</th> <th data-bbox="1227 858 1397 938">2030</th> <th data-bbox="1397 858 1568 938">2035</th> </tr> </thead> <tbody> <tr> <td data-bbox="461 938 898 978">Landfill (C+I and LACW)</td> <td data-bbox="898 938 1059 978" style="background-color: #d9ead3;">-114,496</td> <td data-bbox="1059 938 1227 978" style="background-color: #d9ead3;">-112,951</td> <td data-bbox="1227 938 1397 978" style="background-color: #d9ead3;">-114,726</td> <td data-bbox="1397 938 1568 978" style="background-color: #d9ead3;">-119,392</td> </tr> <tr> <td data-bbox="461 978 898 1018">Landfill (Hazardous)</td> <td data-bbox="898 978 1059 1018" style="background-color: #d9ead3;">-12,741</td> <td data-bbox="1059 978 1227 1018" style="background-color: #d9ead3;">-12,741</td> <td data-bbox="1227 978 1397 1018" style="background-color: #d9ead3;">-12,741</td> <td data-bbox="1397 978 1568 1018" style="background-color: #d9ead3;">-12,741</td> </tr> <tr> <td data-bbox="461 1018 898 1058">Landfill (C+D)</td> <td data-bbox="898 1018 1059 1058" style="background-color: #d9ead3;">-26,534</td> <td data-bbox="1059 1018 1227 1058" style="background-color: #d9ead3;">-23,683</td> <td data-bbox="1227 1018 1397 1058" style="background-color: #d9ead3;">-24,664</td> <td data-bbox="1397 1018 1568 1058" style="background-color: #d9ead3;">-25,685</td> </tr> <tr> <td data-bbox="461 1058 898 1098">Landfill (E)</td> <td data-bbox="898 1058 1059 1098" style="background-color: #d9ead3;">-405,634</td> <td data-bbox="1059 1058 1227 1098" style="background-color: #d9ead3;">-429,334</td> <td data-bbox="1227 1058 1397 1098" style="background-color: #d9ead3;">-447,106</td> <td data-bbox="1397 1058 1568 1098" style="background-color: #d9ead3;">-465,613</td> </tr> <tr> <td data-bbox="461 1098 898 1137">Energy from waste (LACW,C&I)</td> <td data-bbox="898 1098 1059 1137" style="background-color: #d9ead3;">-47,167</td> <td data-bbox="1059 1098 1227 1137" style="background-color: #d9ead3;">-1,438*</td> <td data-bbox="1227 1098 1397 1137" style="background-color: #d9ead3;">3,280</td> <td data-bbox="1397 1098 1568 1137" style="background-color: #d9ead3;">-9,190</td> </tr> <tr> <td data-bbox="461 1137 898 1177">Energy from waste (Hazardous)</td> <td data-bbox="898 1137 1059 1177" style="background-color: #d9ead3;">-53</td> <td data-bbox="1059 1137 1227 1177" style="background-color: #d9ead3;">-53</td> <td data-bbox="1227 1137 1397 1177" style="background-color: #d9ead3;">-53</td> <td data-bbox="1397 1137 1568 1177" style="background-color: #d9ead3;">-53</td> </tr> <tr> <td data-bbox="461 1177 898 1297">Thermal Treatment (without energy recovery) (AGR)</td> <td data-bbox="898 1177 1059 1297" style="background-color: #d9ead3;">-32</td> <td data-bbox="1059 1177 1227 1297" style="background-color: #d9ead3;">-32</td> <td data-bbox="1227 1177 1397 1297" style="background-color: #d9ead3;">-32</td> <td data-bbox="1397 1177 1568 1297" style="background-color: #d9ead3;">-32</td> </tr> <tr> <td data-bbox="461 1297 898 1374">Thermal Treatment (Hazardous –no energy recovery)</td> <td data-bbox="898 1297 1059 1374" style="background-color: #d9ead3;">-2,476</td> <td data-bbox="1059 1297 1227 1374" style="background-color: #d9ead3;">-2,476</td> <td data-bbox="1227 1297 1397 1374" style="background-color: #d9ead3;">-2,476</td> <td data-bbox="1397 1297 1568 1374" style="background-color: #d9ead3;">-2,476</td> </tr> </tbody> </table>	Waste function and stream managed	2018	2025	2030	2035	Landfill (C+I and LACW)	-114,496	-112,951	-114,726	-119,392	Landfill (Hazardous)	-12,741	-12,741	-12,741	-12,741	Landfill (C+D)	-26,534	-23,683	-24,664	-25,685	Landfill (E)	-405,634	-429,334	-447,106	-465,613	Energy from waste (LACW,C&I)	-47,167	-1,438*	3,280	-9,190	Energy from waste (Hazardous)	-53	-53	-53	-53	Thermal Treatment (without energy recovery) (AGR)	-32	-32	-32	-32	Thermal Treatment (Hazardous –no energy recovery)	-2,476	-2,476	-2,476	-2,476	GLA Rep 30-21/24 and 30-6/24
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Section	Proposed change					Representation code														
	Recycling (C+I and LACW)	-95,461	-207,611	-256,906	-288,570															
Recycling (CD&E)	393,108	73,829	-72,993	-102,005																
Recycling (specialist material)	331,997	331,673	331,430	331,177																
Recycling (Hazardous)	-16,838	-16,838	-16,838	-16,838																
Treatment plant (C&I CD&E)	-85,564	-50,667	-57,514	-64,645																
Treatment Plant (Hazardous)	46,437	46,437	46,437	46,437																
Land recovery	-9,098	-9,098	-9,098	-9,098																
Transfer Station	1,555,349	1,233,796	1,233,796	1,233,796																
Transfer Station (Hazardous)	5	5	5	5																
Source: NLWP data study model 2019																				
6.8	<p>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. <u>Reference capacities are set out in the table below.</u></p> <p><u>Reference Capacities for Land Take for New Waste Facilities</u></p> <table border="1" data-bbox="439 1114 1335 1394"> <thead> <tr> <th data-bbox="439 1114 925 1153"><u>Facility type</u></th> <th data-bbox="936 1114 1335 1153"><u>Assumed tonnes per hectare</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="439 1153 925 1193"><u>Energy from waste (large scale)</u></td> <td data-bbox="936 1153 1335 1193"><u>165,000</u></td> </tr> <tr> <td data-bbox="439 1193 925 1233"><u>Energy from waste (small scale)</u></td> <td data-bbox="936 1193 1335 1233"><u>50,000</u></td> </tr> <tr> <td data-bbox="439 1233 925 1273"><u>Recycling (C+I & LACW)</u></td> <td data-bbox="936 1233 1335 1273"><u>128,000</u></td> </tr> <tr> <td data-bbox="439 1273 925 1313"><u>Recycling (C+D)</u></td> <td data-bbox="936 1273 1335 1313"><u>100,000</u></td> </tr> <tr> <td data-bbox="439 1313 925 1353"><u>Recycling (specialised – eg. metals)</u></td> <td data-bbox="936 1313 1335 1353"><u>50,000</u></td> </tr> <tr> <td data-bbox="439 1353 925 1394"><u>Recycling (Hazardous)</u></td> <td data-bbox="936 1353 1335 1394"><u>10,000</u></td> </tr> </tbody> </table>					<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 & 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>	GLA Rep 30-15/24
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7.3	<p data-bbox="443 639 1570 1066">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. Table 8 also takes account of the policy to manage as much of North London's excavation waste arisings within North London as practicable. The quantities of waste take into account population and economic growth and waste targets including net self-sufficiency, apportionment, recycling and landfill diversion, set out in the London Plan. The North London Boroughs are planning to meet more than their apportionment targets and to manage the waste arisings for North London set out in the London Plan. Further details of the methodology to estimate waste arisings is available in the NLWP Data Study (2018).</p> <p data-bbox="443 1114 1420 1142">Table 8: Amount of waste to be managed within North London 2018-2035</p> <table border="1" data-bbox="443 1177 1576 1390"> <thead> <tr> <th colspan="2">Waste Stream</th> <th>2018 (tonnes)</th> <th>2022 (tonnes)</th> <th>2027 (tonnes)</th> <th>2032 (tonnes)</th> <th>2035</th> </tr> </thead> <tbody> <tr> <td colspan="2">Estimated Waste arising</td> <td>2,773,054</td> <td>2,880,209</td> <td>2,952,840</td> <td>3,028,636</td> <td>3,357,725</td> </tr> <tr> <td>Net</td> <td>LACW</td> <td>967,755</td> <td>991,619</td> <td>1,004,001</td> <td>1,017,548</td> <td>1,026,176</td> </tr> </tbody> </table>	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	LACW	967,755	991,619	1,004,001	1,017,548	1,026,176	GLA Rep 30-12/24
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		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																																																
7.5 Table 9	<p>Table 9: Projected exports from North London to landfill <u>2022-2035</u></p> <table border="1"> <thead> <tr> <th>Waste Stream</th> <th>2018 (tonnes)</th> <th>2022 (tonnes)</th> <th>2027 (tonnes)</th> <th>2032 (tonnes)</th> <th>2035</th> </tr> </thead> <tbody> <tr> <td>Excavation</td> <td>405,634</td> <td><u>39,226</u> 419,012</td> <td><u>40,849</u> 436,356</td> <td><u>42,540</u> 454,419</td> <td><u>43,588</u> 465,613</td> </tr> <tr> <td>C&I</td> <td>112,496</td> <td>109,868</td> <td>111,666</td> <td>114,569</td> <td>117,392</td> </tr> <tr> <td>C&D</td> <td>26,534</td> <td>23,114</td> <td>24,071</td> <td>25,067</td> <td>25,685</td> </tr> <tr> <td>LACW</td> <td>2,000</td> <td>2,000</td> <td>2,000</td> <td>2,000</td> <td>2000</td> </tr> <tr> <td>Hazardous waste</td> <td>12,741</td> <td>12,741</td> <td>12,741</td> <td>12,741</td> <td>12,741</td> </tr> <tr> <td>Total <u>to landfill</u></td> <td>559,405</td> <td><u>186,949</u> 566,735</td> <td><u>191,327</u> 586,834</td> <td><u>196,917</u> 608,796</td> <td><u>201,406</u> 623,431</td> </tr> <tr> <td><u>Beneficial use of excavation waste</u></td> <td>367,661</td> <td><u>379,786</u></td> <td><u>395,507</u></td> <td><u>411,879</u></td> <td><u>422,025</u></td> </tr> </tbody> </table>						Waste Stream	2018 (tonnes)	2022 (tonnes)	2027 (tonnes)	2032 (tonnes)	2035	Excavation	405,634	<u>39,226</u> 419,012	<u>40,849</u> 436,356	<u>42,540</u> 454,419	<u>43,588</u> 465,613	C&I	112,496	109,868	111,666	114,569	117,392	C&D	26,534	23,114	24,071	25,067	25,685	LACW	2,000	2,000	2,000	2,000	2000	Hazardous waste	12,741	12,741	12,741	12,741	12,741	Total <u>to landfill</u>	559,405	<u>186,949</u> 566,735	<u>191,327</u> 586,834	<u>196,917</u> 608,796	<u>201,406</u> 623,431	<u>Beneficial use of excavation waste</u>	367,661	<u>379,786</u>	<u>395,507</u>	<u>411,879</u>	<u>422,025</u>	GLA Rep 30-12/24
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7.6	<p>The North London Boroughs have engaged with each of the main recipients of North London's waste to landfill and identified if there are planning reasons why similar exports of waste cannot continue over the plan period, for example the planned closure of a site. This work is set out in the <u>Duty to Co-operate Report - North London Exports to Landfill 2017-2032 (2018)</u>. The North London Boroughs have established</p>						GLA Rep 30-12/24																																																

Section	Proposed change	Representation code
	<p>that <u>there is opportunity for the market to find alternative destinations in the wider south east for North London's 'homeless' waste 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</u> there are sites and available void space in London, South East and East of England to take North London's estimated waste exports to 2035. The Boroughs will continue to co-operate with waste planning authorities who receive North London's waste, and mechanisms for monitoring waste movements after the NLWP is adopted are set out in in section 10.</p>	
7.19	<p>The NLWP will identify sufficient land to manage the equivalent of all Construction and Demolition (C&D) waste arising in North London by 2035, while acknowledging that some exports will continue, particularly for Excavation waste. <u>At least 95% of excavation waste exports will be put to beneficial use.</u></p>	GLA Rep 30-12/24
7.21	<p>North London has a number of transfer facilities which also recycle CD&E waste but a large quantity is still exported to landfill, mainly excavation waste. Recycling opportunities are likely to be mainly for C&D wastes although around 28% of excavation waste is also recycled within North London, with 53% being disposed of directly to landfill and 19% through treatment facilities. Taking account of the diversion of C&D waste away from landfill, the Data Study has identified a capacity gap of around 67,000 tonnes per annum from 2029, rising to around 102,000 tonnes per annum by 2026 <u>2035</u>. Provision will be needed throughout the plan period.</p>	GLA Rep 30-12/24
7.22	<p>A total of 2 hectares of land will be required to facilitate this provision. Opportunities to re-use CD&E waste locally will be supported, though this cannot be predicted with any certainty. Policy 8 'Inert Waste' seeks to ensure that any planning application for the recycling and reuse of inert waste for all types of development demonstrates that viable opportunities to minimise construction and demolition <u>CD&E</u> waste disposal will be taken, making use of existing industry codes of practice and protocols, site</p>	GLA Rep 30-12/24

Section	Proposed change	Representation code
	waste management plans and relevant permits and exemptions issued by the Environment Agency.	
7.23	<p><u>Landfill</u></p> <p>North London has no landfill sites and depends on capacity outside the NLWP area. Some A reduced amount of the CD&E waste stream, particularly excavation waste, will continue to be exported to landfill but the majority (95%) of C&D waste will be reused, recycled and recovered and the majority of excavation waste (95%) will be put to beneficial use, unless opportunities materialise to re-use it locally. It is anticipated that C&D waste exports to landfill will reduce over the plan period while excavation waste exports will increase in line with growth.</p>	GLA Rep 30-12/24
7.24	<p>The North London Boroughs, working with waste planning authorities who receive CD&E waste from North London, have identified constraints to the export of this waste and have established that there are both alternative landfill sites and adequate void space in London, South East and East of England to take North London's waste between 2017 and 2035. See Figure 12 for the anticipated decline in landfilling of North London's waste over the plan period. and have established that there are both alternative landfill sites and adequate void space in London, South East and East of England to take North London's waste between 2017 and 2035. See Figure 12 for the anticipated decline in landfilling of North London's waste over the plan period.</p>	
8.2	<p>The NLWP identifies a number of areas to meet future waste needs. An 'area' comprises a number of individual plots of land, for example, an industrial estate or employment area that is in principle suitable for waste use but where land is not specifically safeguarded for waste. The NPPW and the draft <u>new</u> London Plan (<u>July 2019</u>) endorse the identification of "sites and/or areas" in Local Plans. The approach is also supported by the waste industry and key stakeholder in consultation. It was initially intended to also identify sites within the NLWP, i.e. individual plots of land that would be safeguarded for waste use. However, only one site was brought forward by landowners</p>	GLA 30-5/24

Section	Proposed change	Representation code
	during the call for sites exercises and no further sites are required for the management of LACW. As a result, only areas have been identified.	
8.11	Where existing sites need to be relocated, compensatory capacity is required in order to comply with the London Plan, Borough Local Plans and, once adopted, the NLWP. It is known that some <u>waste sites in North London will be redeveloped for other uses</u> capacity will be lost during the plan period. Some of this capacity will be replaced within North London, some outside North London with a net loss to North London but not to London as a whole, and some is as yet unknown. Where such issues are known and new sites have already been sought, this information has been fed in to the Plan process and information has been given in Schedule 1.	GLA Rep 30-16/24
8.12	The North London Boroughs are aware that the regeneration of Brent Cross Cricklewood <u>Regeneration Area redevelopment (BXC) is likely to affect</u> includes four 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; <u>planning permission for this new site at Geron Way was granted by Barnet Council in September 2018.</u> The existing <u>commercial facilities at BAR 6 and BAR 7 fall within the land required to deliver the</u> early first Southern phase of the BXC regeneration which is <u>expected to</u> anticipated will commence in <u>the near term</u> early 2018. <u>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.</u> <u>The BAR3 site is identified for redevelopment in Phase 4 of the BXC regeneration and is currently not anticipated to be redeveloped until after 2026.</u> <u>Capacity at the waste facilities of BAR 4, BAR 6 and BAR 7 and part of the capacity of BAR 3 will be replaced by the new Waste Transfer</u>	GLA

Section	Proposed change	Representation code
	<p><u>Station (WTS) delivered as part of the Brent Cross Cricklewood Regeneration. The balance of replacement capacity for BAR3 will need to be identified prior to its redevelopment and the London Borough of Barnet will seek to provide replacement capacity within the borough with the Local Plan identifying potential sites.</u></p>	
9.10	<p>[...] The NPPF and the draft <u>new</u> London Plan (<u>July 2019</u>) sets out the ‘Agent of Change’ principle. This principle places the responsibility of mitigating the noise <u>impact of noise, dust, vibration and other nuisance-generating activities</u> (from existing noise-generating businesses) on the proposed new development. Developers proposing non-waste development in close proximity to existing waste sites should be aware of the potential impacts on existing waste operations and plan this into their development so as not to prevent or prejudice the continued waste use in that location, otherwise such developments will not be permitted. Accordingly proposed non-waste developments should be designed to protect both the amenity of potential new residential developments and the existing waste operation within that area.</p>	GLA Rep 30-18/24
P2	<p>Policy 2: Locations for new waste management facilities</p> <p><i>Areas listed in Schedule 2: Areas suitable for waste management and Schedule 3: Areas identified in LLDC Local Plan are identified as suitable for built waste management facilities <u>to meet the identified need set out in Tables 6 and 7.</u></i></p> <p>Applications for waste management development will be permitted on suitable land within the areas identified in Schedule 2 subject to other policies in the North London Waste Plan, the London Plan and Local Plans, and related guidance.</p> <p>Development proposals will need to manage waste as far up the waste hierarchy as practicable.</p>	GLA Rep 30-21/24 and 30-6/24

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	Applications for waste management development within the areas identified in Schedule 3 will be assessed by the London Legacy Development Corporation.	
9.13	The NLWP identifies several areas to provide land suitable for the development of waste management facilities. Each 'area' comprises a number of individual plots of land, for example, an industrial estate or employment area that is in principle suitable for waste use but where land is not safeguarded for waste. The identification of areas suitable for waste uses, subject to detailed site assessment at planning application stage, will help to achieve net self-sufficiency whilst encouraging co-location of facilities and complementary activities (an objective of the NPPW and Spatial Framework). <u>Areas listed in Schedule 2: Areas suitable for waste management and Schedule 3: Areas identified in LLDC Local Plan suitable for new waste facilities will be identified in borough policies maps, and any new waste sites will be safeguarded and identified in borough policies maps.</u>	GLA Rep 30-24/24
9.28	There will be mixed use developments across North London within the period of the NLWP. The revised <u>new</u> London Plan <u>(July 2019)</u> sets out a framework for development of new housing and employment together with the ancillary development necessary to sustain that development. Crossrail 2 will impact considerably on north London as mixed use development is expected to accumulate around Crossrail 2 stations.	
9.29	In large scale redevelopment areas across the boroughs there is opportunity to plan for waste uses to form part of the master-planning process. In this way it should be possible to design-out any potential land use conflicts with non-waste uses in close proximity and support the agent of change principle as promoted by the <u>draft new</u> London Plan <u>(July 2019)</u> . In such areas it may also be beneficial to allow temporary sites that can manage CDE waste generated as part of the redevelopment, subject to licencing and planning requirements.	GLA 30-5/24
9.56	As part of the Circular London programme, LWARB published a Circular Economy Route Map in June 2017. The Route Map recommends actions for a wide range of stakeholders, including London's higher education, digital and community sectors as	GLA 30-5/24

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	well as London's businesses, social enterprises and its finance sector. Developers should submit a Circular Economy Statement in line with the <u>draft new London Plan (July 2019)</u> and guidance issued by the Mayor.	
9.61	Work is already underway to progress the delivery of a decentralised network in the Lee Valley known as <u>Meridian Water</u> the Lee Valley Heat Network (LVHN) . The LVHN <u>Meridian Water</u> will capture affordable low carbon heat from waste to energy facilities and combined heat and power plants, supplying it to buildings and industry across the Lee Valley. The LVHN <u>Meridian Water</u> is requesting hot water to be supplied for the energy from waste facility (EfW) at Edmonton EcoPark. However, over time, the network will connect additional heat sources, including other waste developments, elsewhere in the Lee Valley. <u>Any future plans to redevelop the site, including the current plan for Meridian Water should ensure that the openness and permanence of the Green Belt is maintained in accordance with draft New London Plan Policy G2.</u>	GLA Rep 30-19/24
10.4	To supplement the boroughs' annual monitoring, it will be important for the GLA to monitor London Plan <u>waste Policies 5.16 and 5.17</u> and gather data in partnership with the boroughs on waste arisings, waste management capacity, both within London and landfill outside of London.	GLA 30-5/24
Schedule 1	♦ 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. <u>Planning permission for this new sites at Geron Way was granted by Barnet Council Planning Committee in September 2018.</u> The existing commercial facilities at BAR 6 and BAR 7 fall within the land required to deliver the first early Southern phase of the BXC regeneration which is anticipated will <u>expected to commence in the near term; replacement capacity for these sites will be sought in accordance with the planning permission for Brent Cross Cricklewood. early 2018.</u> Replacement capacity for these sites will not be provided prior to their redevelopment	GLA

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	<p>and therefore replacement capacity will be sought outside of the BXC regeneration area on alternative sites / areas to be identified within the London Borough of Barnet.</p> <p><u>The BAR3 site is identified for redevelopment in Phase 4 of the BXC regeneration and is currently not anticipated to be redeveloped until after 2026. Capacity at the waste facilities of BAR 4, BAR 6 and BAR 7 and part of the capacity of BAR 3 will be replaced by the new Waste Transfer Station (WTS) delivered as part of the Brent Cross Cricklewood Regeneration. The balance of replacement capacity for BAR3 will need to be identified prior to its redevelopment and the London Borough of Barnet will seek to provide replacement capacity within the borough with the Local Plan identifying potential sites.</u></p>	