

STATEMENT OF COMMON GROUND

BETWEEN

THE NORTH LONDON BOROUGHS

AND

SURREY COUNTY COUNCIL

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

Surrey County Council representations

Surrey County Council’s representations relate to the approach to waste exports and hazardous waste in the North London Waste Plan (NLWP) and related evidence base.

Surrey County Council’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 Surrey County Council’s points made in their representations.

The North London Boroughs and Surrey County Council have now agreed a SoCG on waste exports as set out in Appendix A of the NLWP Duty to Co-operate Report (Aug 2019).

It is recognised that the figures for each Waste Planning Authority in the Exports to Landfill 2020-2035 document are indicative only and represent only one method of estimating where waste exports could go over the plan period. The figures should therefore not be viewed as an ‘apportionment’.

The NLWP is clear in its aim for net self-sufficiency for LACW, C&I and C&D waste streams, including hazardous waste. The NLWP is also clear that excavation waste is excluded from the aim for net self-sufficiency. Some excavation waste generated in North London will be managed in North London and the amount is shown in Table 8. Some excavation waste will be exported and the amount is shown in Table 9.

The Proposed Submission NLWP was drafted before the suggested changes to the new London Plan were published that subsequently removed excavation waste from the target

of net self-sufficiency by 2026 and included a target of 95% beneficial use for excavation waste.

Para 10.6 sets out what will be done if monitoring indicates that the targets in Table 14 are not being achieved. It states "In line with statutory requirements, the North London boroughs will review the plan every five years. If any targets are not being met the boroughs will assess where changes can and should be made."

Areas of Disagreement

Article 4 Directions

It is the view of Surrey County Council that the NLWP could seek to commit borough councils to using their 'Article 4' powers to influence use of the General Permitted Development Order which allows change of use from offices to residential. This would be in situations where offices close to existing waste management facilities might be converted to residential use and consequently hinder the operation of such waste facilities. However, the North London Boroughs consider that this does not fall under the remit of the NLWP and that, many of the North London Boroughs already have Article 4 Directions in place for the industrial Areas identified as suitable for waste uses in the NLWP. This includes all SIL and LSIS in Haringey and Waltham Forest, three of the four Areas in Barnet.

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

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

Signed on behalf of Surrey County Council

Signed: 
Caroline Smith
Planning Group Manager
Surrey County Council
Date: 06/11/2019

Appendix A: Representations from Surrey County Council

Code	Section	Policy / Para	Representation
39-1/6	7	SP	<p data-bbox="929 339 1966 448">Thank you for giving Surrey County Council as the Waste Planning Authority the opportunity to make a representation on the Proposed Submission Draft of the North London Waste Plan (NLWP).</p> <p data-bbox="929 496 2036 683">The strategy for managing waste in North London is set out in Section 7 of the NWLP. This includes the achievement of net self-sufficiency in LACW and C&I waste by 2026 and C&D waste by 2035, including hazardous waste. With regard to excavation waste, the approach is to <i>“manage as much of North London’s excavation waste arisings within North London as practicable”</i>.</p> <p data-bbox="929 730 1895 762">The resulting waste management capacity requirements would be met by:</p> <ul data-bbox="929 770 1664 842" style="list-style-type: none"> ○ Safeguarding existing capacity ○ Identify new sites for recycling and recovery capacity <p data-bbox="929 890 1769 922">This would reduce the need for landfill and the exports of waste.</p> <p data-bbox="929 970 2000 1157"><i>Paragraph 7.5 states: “The North London boroughs will plan to manage the equivalent amount of exported waste within North London through waste imports however, in reality, some of North London’s waste will continue to cross borders to be managed or disposed of in facilities which North London does not or cannot accommodate, such as landfill or specialist hazardous waste facilities.”</i></p> <p data-bbox="929 1204 2007 1353">Section 7 sets out the quantities of waste that would need to be managed in North London for these targets to be achieved (in Table 8) and also sets out (in Table 9) how much waste would be exported to landfill, recognising that North London is unable to develop landfill capacity.</p>

Code	Section	Policy / Para	Representation
			<p>The general approach set out in Section 7 (as outlined above) is supported as it is considered that this reflects the realities of managing waste in this area. It should be noted that in general terms the Surrey Waste Local Plan recognises that waste will be managed in Surrey that is produced in London; Paragraph 4.1.1.1 states: <i>“The Plan accepts that it is not practicable to deal only with waste produced in Surrey and that cross-boundary waste movements, including from London, are necessary to support the viable and efficient operation of waste management facilities.”.</i></p> <p>The SWLP also notes that, amongst other areas, towns close to the boundary with London are likely to offer opportunities for waste development that are in accordance with its Spatial Strategy.</p> <p>Paragraph 5.21 of the NWLP suggests that 747,243 tonnes of excavation waste was produced in North London in 2016 and of this 53% was disposed directly to landfill with the remainder managed through transfer stations (28%) or sent for treatment (19%).</p> <p>Table 8 shows that between 353,831 (2018) and 406,151 (2035) tonnes of excavation waste will be managed per year within North London. Table 9 shows that between 405,634 (2018) and 465,613 tonnes of excavation waste will be exported to landfills outside of the North London area. This suggests that over 50% of excavation waste will be exported to landfill which does not appear to be consistent with the London Plan 95% C, D & E waste target for recycling by 2020 mentioned in paragraph 5.21. It seems that this is because, in the NLWP, the management of excavation waste is being considered separately to the management of C&D waste. Indeed, the NLWP strategy for managing excavation waste is <i>“to manage as much of North London’s excavation waste arisings within North London as practicable. To achieve this, the North London Boroughs will plan to manage the quantities of waste set out in Table 8 over the next 15 years.”</i> It is noted that the NLWP strategy for</p>

Code	Section	Policy / Para	Representation
			<p>achieving 100% net self-sufficiency specifically does not include excavation waste. This reliance on export for the management of excavation waste is entirely understandable given the lack of opportunities that would exist in such a built up area for the deposit of such large quantities of material.</p> <p>Specific comments about certain other elements of the NLWP are provided below.</p>
39-2/6	9	Policy 1	<p>Safeguarding</p> <p>It is essential that in light of the pressure on land for development in North London that existing waste management capacity is robustly safeguarded against development for other uses. The approach to safeguarding is set out in Policy 1 and this is generally supported, however a particular issue relates to the conversion of offices to residential development via permitted development rights whereby offices, proximate to waste facilities are converted to a use that is much more sensitive to waste activities. In light of the Boroughs powers to influence such change of use, through the issue of 'Article 4 directions', it is considered that the Plan should commit the Boroughs to issuing such directions where offices proximate to existing waste management facilities might be converted to residential use that would hinder the operation of such a facility.</p>
39-3/6	7	7.5	<p>Landfill</p> <p>The production of excavation waste in 2016 is reported as 747,242 tonnes in Table 2 and Table 9 suggests 405,634 of excavation waste will be exported to landfill in 2018 – taken together this suggests that 54% of excavation waste is exported to landfill. Paragraph 5.21 states <i>“Excavation materials are primarily disposed of directly to landfill (53%) with the remainder managed through transfer stations (28%) or sent for treatment (19%).”</i></p> <p>And so it can be taken that all management of excavation waste by landfill takes place outside of the North London Boroughs area.</p>

Code	Section	Policy / Para	Representation
			<p>Paragraph 3.3 of the NLWP sets out the 'Aim of the NLWP' and includes the following:</p> <p><i>"To achieve net self-sufficiency for LACW, C&I and C&D waste streams, including hazardous waste, and support a greener London by providing a planning framework that contributes to an integrated approach to management of materials further up the waste hierarchy. The NLWP will provide sufficient land for the sustainable development of waste facilities that are of the right type, in the right place and provided at the right time to enable the North London Boroughs to meet their waste management needs throughout the plan period".</i></p> <p>However, this aim does not fully reflect the reliance North London has on areas beyond its boundaries for the management of waste by landfill. Specifically, the aim is misleading for the following reasons:</p> <ol style="list-style-type: none"> 1. It appears to specifically exclude excavation ('E') waste and so it is not clear what the 'aim' for the management of this significant waste stream is (747,242 tonnes in 2016); 2. Suggests that waste facilities will be provided 'in North London' to meet the waste management needs to the North London boroughs. This is not consistent with net 'self-sufficiency' and does not reflect the fact that the North London Boroughs will be specifically reliant on areas beyond the Plan for the management of waste by landfill (Table 12 shows the predicted export to landfill to 2035). <p>Paragraph 4.9 of the NLWP states: <i>"The NLWP is underpinned by an aim to achieve net self-sufficiency for LACW, C&I, C&D waste streams, including hazardous waste."</i> and <i>"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."</i></p>

Code	Section	Policy / Para	Representation
			<p>Paragraph 4.9 of the NLWP goes onto to suggest that “Waste is exported to a number of areas outside of North London, mainly in the south east and east of England and Figure 12 shows the estimated reduction of waste exports over the plan period.” but it is considered that this is a misleading statement as Table 9, which shows tonnages rather than percentages, clearly projects an increase in exports to landfill over the Plan period.</p> <p>Paragraph 5.8 notes there are no landfill sites in North London and paragraph 5.31 acknowledges the tension between any ongoing reliance on exports of waste to landfill and the finite capacity of such sites. A separate evidence report entitled ‘Exports to landfill from North London 2020-2035 (January 2019)’ seeks to address this and describes in detail how waste is currently exported to landfill and estimates how this might continue over the life of the NLWP. Clearly, from the perspective of an authority that receives waste from North London, this is an important document that requires particular attention and related comments are provided below.</p> <p>Table 4.7 of the Exports to Landfill report shows ‘estimated exports of hazardous waste to landfill 2020-2035’ and suggests that hazardous waste, in the order of 1,784 tonnes per year, will be landfilled in Surrey over the period to 2035. It is understood that this is based on the average level of exports of hazardous waste to Surrey that took place between 2013 and 2017. However, the site which received this waste (Patteson Court landfill near Redhill) between 2013 and 2017, is required to be restored by 2030 which means it will likely stop accepting hazardous waste by the end of 2028 (possibly earlier). It is therefore not appropriate to plan on the basis that 1,784 tonnes of hazardous waste will be landfilled in Surrey beyond this time. It may well be the case that this waste can be diverted to other facilities but this ought to be investigated and table 4.7 updated accordingly. It is noted that Section 6 does in fact acknowledge the closure of Patteson Court (albeit by 2030), and so it is</p>

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			<p>unclear how it has been assumed that 1,784 tonnes can be managed in Surrey during the period 2030 to 2035.</p> <p>It is also noted that Section 5 of the report, which sets out exports to landfill by WPA, is not consistent with Table 4.7 as the only mention of hazardous waste is in Table 5.8 which relates to relatively small quantities (less than 300tpa) projected as going to landfill in other WPA areas i.e. Section 5 does not reflect the greater quantities of hazardous waste projected as being landfilled in Surrey and other areas. Similarly, Table 6.2 is intended to represent recent waste exports to certain landfill sites due to close, but, while including Patteson Court, it does not show the past imports of hazardous waste to this site which, as mentioned above, is the important issue. In fact, Table 6.2 makes no mention of hazardous waste at all. In light of this it is not clear how this report can be relied on to assist with planning for the need for future landfill of hazardous waste emanating in North London.</p> <p>The above analysis raises a question mark over the veracity of the statement in paragraph 5.32 of the NLWP, that <i>“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.”</i></p> <p>It should be noted that despite the future closure of Patteson Court, the SWLP does not specifically allocate additional landfill capacity due to declining requirements and the fact that no sites were proposed for allocation by the industry or landowners.</p> <p>Paragraph 7.3 of the Exports to Landfill study asserts that: <i>“The destination of waste is largely dependent on market forces and exports will continue to go to the most suitable facility. Therefore it is not possible to identify a</i></p>

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			<p><i>specific landfill site or sites where North London’s waste will go over the next 15 years.”</i></p> <p>SCC do not agree with this statement as it appears to suggest that it is market forces which dictate which is the ‘most suitable facility’ at which waste should be managed. In doing so it ignores how the planning process is intended to influence where waste should be managed. Facilities can only be developed that have planning permission and an environmental permit and so their suitability has been established through these processes, however the waste industry will then make a choice of which facility to use based on cost (market forces) but this does not mean this is the <i>most</i> suitable facility for the management of waste being produced in a particular area. Perhaps the issue here is about how one defines ‘most suitable’ as this will depend on the perspective taken, but either way this statement over simplifies the situation. Having said that, SCC broadly agree with the statement made in paragraph 5.5 of the Duty to Cooperate report (set out in footnote below1), that is it is not possible to be precise about where waste from North London will be managed in future but it is important that the North London Boroughs establish that there will be sufficient opportunities and this is what the report attempts to do.</p> <p>The report concludes in paragraph 8.3 that: <i>“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.”</i></p> <p>And in paragraph 8.4: <i>“Mechanisms for monitoring waste movements after the NLWP is adopted will be set out in memoranda of understanding and in the NLWP itself.”</i></p> <p>It is noted that the conclusion in paragraph 8.3 is only concerned with the ‘short term’ and this is not especially reassuring. SCC also consider that, from the evidence</p>

Code	Section	Policy / Para	Representation
			<p>presented in the report, this conclusion cannot be reached insofar as hazardous waste is concerned. It is also considered that the above does not justify the following statement made in paragraph 5.5 of the Duty to Cooperate report:</p> <p><i>“The boroughs contend that the information in the Exports to Landfill reports provides sufficient information to demonstrate that there is available void space for North London’s waste.”</i></p> <p>In terms of the statement about monitoring, the NLWP includes the following indicator:</p> <p><i>“6. Amount of waste exported to landfill by waste stream (LACW, C&I and CD&E)”</i></p> <p>With the following target:</p> <p><i>“Exported waste to landfill in line with Table 9 of the NLWP”</i></p> <p>And following sought outcome:</p> <p><i>“Waste exports are in line with those estimated in the NLWP and through the duty to co-operate”</i></p> <p>However, there is no indication what would be done if the monitoring indicates that the target is not being achieved i.e. whether waste exports either exceed or don’t achieve the levels in Table 9. Such a target might not be achieved if insufficient facilities have been developed within North London and this ought to trigger a review of the Plan. Furthermore, if levels are below those in Table 9 then this would be a positive outcome and so the target ought to be modified to reflect this. In any event this target does not require any monitoring by the North London boroughs of landfill availability and so it would be impossible to form any conclusions on the ability of waste from North London to be landfilled in future. SCC suggest that this is required to allow the North London boroughs to alert authorities of the need to take North London’s requirements into account when planning for additional landfill capacity.</p>

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			<p>Relevant to this matter is paragraph 3.7.1.3 of the emerging SWLP that states: <i>“The county council will work collaboratively with other WPAs, particularly those in in the South East of England and adjoining Surrey (i.e. in London), to ensure that provision of strategic capacity is coordinated as far as possible.”</i></p> <p>The NLWP reliance on landfill for excavation waste (as shown in Figure 12) does not seem to reflect the fact that the deposit of excavation waste on land does not necessarily equate to ‘landfill’. Indeed, the fact that excavation waste is generally inert material makes it suitable for use in engineering applications such as landscaping and the restoration of mineral workings. SCC take such uses to be beneficial and as such consider them to constitute a waste recovery, rather than a disposal, operation that can be implied by use of the term ‘landfill’. Specifically, the Submission SWLP states:</p> <p><i>“ 5.2.5.2 In Surrey, inert material derived from C,D&E waste is a valuable resource and when used in mineral site restoration as inert fill or as capping material for landfilling or landraising activities is considered to be a recovery operation. This is explained further in the Minerals Site Restoration SPD. Given the need for this type of material in restoration, this activity is the preferred option over any other recovery operation.</i></p> <p><i>5.2.5.3 Other types of recovery operations involving inert waste can include:</i></p> <ul style="list-style-type: none"> <i>• Constructing haul roads / hardstanding.</i> <i>• Agricultural land improvements or other engineering operations.</i> <i>• Landscaping and noise attenuation bunds.</i> <p><i>5.2.5.4 Proposals involving the use of inert waste for recovery to land will be acceptable where the benefits of the development clearly outweigh any potential adverse impacts as set out by Policy 5 below. Disposal of inert waste to land is considered unacceptable.”</i></p>

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			<p>This approach reflects that taken by other Waste Planning Authorities in the south east and is being reflected by the Greater London Authority in its further suggested changes to the London Plan.</p> <p>The assumption in the NLWP that inert excavation waste currently being managed at landfills outside of North London, will in future, continue to need to be managed in this way does not acknowledge the approach above. Therefore, matching the production of inert excavation waste to the available capacity of landfills does not give an accurate representation of the availability of capacity for the management of this waste stream and paints an overly pessimistic picture.</p>
39-4/6	7	7.25	<p>Hazardous Waste</p> <p>Observations on the NLWP approach to the management of hazardous waste are set out below.</p> <p>Paragraph 1.4 notes that <i>“The NLWP plans for all principal waste streams including: Hazardous: A sub category of all waste streams where the material produced is hazardous and requires specialist treatment”</i> and paragraph notes that <i>“treatment facilities handle a small proportion of North London’s hazardous waste (less than 1% in 2016) while the rest (99.4%) is exported.”</i></p> <p>Paragraph 5.33, notes the boroughs intention <i>“to engage with the Environment Agency and waste planning authorities in receipt of hazardous waste from North London, including seeking to identify any constraints to the continued export of this waste. 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. The North London Boroughs will pursue agreement on this matter with recipient waste planning authorities through a statement of common ground.”</i> However, it is unclear how the boroughs will seek to identify potential new destinations and whether ‘new destinations’ means new sites</p>

Code	Section	Policy / Para	Representation
			<p>capable of development for new capacity or existing sites, which in the vast majority of cases will be beyond North London. If it is the former then this implies that the North London boroughs will need to keep an ongoing record of surplus hazardous waste management capacity beyond its area and, if there is no such capacity what would happen?</p> <p>Section 6 on Future Waste Management Requirements includes waste targets and a 'chosen approach' which relates to LACW, C&I and C&D waste and with no mention of hazardous waste, however Table 6 shows the capacity gaps for several types of hazardous waste management. Paragraph 6.8 states <i>"Table 7 below sets out the amount of land required within North London to meet the capacity gaps identified in Table 6 for the chosen approach of net self-sufficiency for LACW, C&I and C&D waste streams."</i> But Table 7 includes landtake estimates (2 hectares needed in 2018) for a management category termed 'Recycling (Hazardous)'. Paragraph 6.10 states: <i>"A capacity gap equivalent to two hectares of land has been identified for meeting North London's hazardous waste management need over the plan period, a small requirement of less than 2,500 tonnes per annum has also been identified for recovery of hazardous waste, but this figure is considered too small to plan for."</i> It is hard to understand how a 'small' requirement of 2,500 tonnes per annum equates to the need for two hectares and in turn how this is considered 'too small to plan for'.</p> <p>Despite the apparent reliance on exports of hazardous waste set out in paragraph 5.33, paragraph 6.10 states: <i>"While the North London Boroughs support the provision of hazardous waste facilities in appropriate locations, it is acknowledged that these facilities generally operate for a wider-than-local catchment area due to their specialist nature. The Boroughs will therefore work with the GLA and other boroughs across London to identify and meet a regional need."</i> It is noted that paragraph 6.11 states: <i>"In relation to the gap for Hazardous waste, the North London</i></p>

Code	Section	Policy / Para	Representation
			<p><i>Boroughs will contribute to the planning for hazardous waste facilities at a regional level and through the identification of areas within North London that may be suitable for hazardous waste facilities.”</i></p> <p>Section 7 clarifies that <i>“There is a capacity gap for the recovery of around 2,500 tonnes per annum, this is considered too small a figure to plan for provision of a new facility and as such a specific land requirement is not identified for this management option. There is a requirement for recycling of around 17,000 tonnes per annum, requiring an estimated 2ha of land.”</i> And states that the NLWP indicates which allocated sites could accommodate hazardous waste management capacity and recognises that any development would likely be used to manage hazardous waste from an area wider than just North London.</p> <p>While section 7 does clarify the approach to planning for hazardous waste, the earlier sections (5 and 6) are considered to be less clear. Overall the approach set out in Section 7 is supported.</p>
29-5/6	4	4.11	<p>Green Belt</p> <p>The NLWP does not include policy on the development of waste facilities with the Green Belt, however paragraph 4.11 states <i>“In addition, some areas, such as the protected Green Belt in the north, will be largely out of bounds for any built waste facilities.”</i> To suggest Green Belt is ‘out of bounds’ for waste facilities appears to rule out any possibility that waste management could come forward within such a designation which is inconsistent with national policy. In fact, if it can be shown that very special circumstances exist then waste development can come forward. In light of the physical constraints on development in North London for waste management capacity it is important that the NLWP does not overstate the impact of planning constraints.</p>

Code	Section	Policy / Para	Representation
29-6/6	7	SP	<p>It is noted that the NLWP strategy states that <i>“The North London Boroughs will continue to co-operate with waste planning authorities who receive significant quantities of waste exports from North London”</i> and Surrey County Council acknowledges that work is currently underway to prepare a Statement of Common Ground between it and the North London Boroughs and hope that it will soon be possible to reach final agreement on the text. It is important that this representation is read alongside this Statement of Common Ground.</p>

Appendix B: Proposed Modifications

Section	Proposed change	Representation code
4.9	The NLWP is underpinned by an aim to achieve net self-sufficiency for LACW, C&I, C&D waste streams, including hazardous waste. This will be achieved by identifying enough existing capacity and land in North London suitable for the development of new waste management facilities to manage the equivalent of 100% of this waste arising in North London. 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. Waste is exported to a number of areas outside of North London, mainly in the south east and east of England and Figure 12 shows the <u>the estimated reduction of waste exports to landfill as a % of the total waste stream</u> over the plan period. The strategy for achieving net self-sufficiency is set out in the Provision for North London's Waste to 2032 in section 7.	Surrey (Rep 39-3/6)
4.11	[...] In addition, some areas, such as <u>most waste facilities would be regarded as inappropriate development in</u> the protected Green Belt in the north, will be largely out of bounds for any built waste facilities unless very special circumstances justifying the use of Green Belt land have been demonstrated.	Surrey 29-5/6
5.21	[...] The <u>draft New London Plan</u> includes a target of 95% <u>reuse/recycling/recovery of C&D waste CD&E by 2020</u> and 95% beneficial use of excavation waste.	Surrey (Rep 39-1/6)
5.31	Engagement to date has identified a constraint to the continuation of waste exports to landfill from North London relating to the scheduled closure of landfill sites during the plan period. Details can be found in the paper, Exports to Landfill 2017-2035, on the NLWP website (www.nlwp.net), though the operation of some of these sites may be extended beyond their currently permitted end date. <u>The choice of the destination of waste to suitable sites is largely dependent on market forces and therefore it is not</u>	Surrey Rep 39-3/6

	<p><u>possible to identify specific alternative destinations where North London’s waste will go after the closure of landfill sites during the plan period.</u> The boroughs will continue to monitor this information throughout the preparation of the NLWP, and after it the NLWP is adopted as reflected in the monitoring framework in section 10.</p>	
5.32	<p>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. <u>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 workings. The 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. The paper shows that There is opportunity for the market to find an are both alternative destinations sites and adequate void space in London, South East and East of England for to take 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.</u></p>	Surrey Rep 39-3/6
5.34	<p>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. <u>No planning issues have been identified which will prevent North London’s hazardous waste continuing to be managed at these specialist facilities.</u> <u>However,</u> the boroughs will continue to <u>monitor engage with the Environment Agency and waste planning authorities in receipt of hazardous waste exports from North London and engage with recipient authorities when and if there are any substantial changes. including seeking to identify any constraints to the continued export of this waste.</u> 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. The North London</p>	Surrey Rep 39-4/6

	Boroughs will pursue agreement on this matter with recipient waste planning authorities through a statement of common ground.																						
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 are as follows:</p> <p>Table 5: Recycling and Recovery Targets with 2016 Baseline</p> <table border="1"> <thead> <tr> <th>Waste stream</th> <th>Target</th> <th>2016 baseline</th> </tr> </thead> <tbody> <tr> <td>LACW</td> <td>50% recycling for LACW by 2025 (contributing to 65% recycling of municipal waste by 2030)</td> <td>29%</td> </tr> <tr> <td>C&I</td> <td>75% recycling by 2030 (contributing to 65% recycling of municipal waste by 2030)</td> <td>52%</td> </tr> <tr> <td>C&D</td> <td>95% <u>reuse/recycling/recovery</u> by 2020</td> <td>50-60%</td> </tr> <tr> <td><u>Excavation</u></td> <td><u>95% beneficial use</u></td> <td><u>Not known</u></td> </tr> <tr> <td>Biodegradable or recyclable waste</td> <td>Zero biodegradable or recyclable waste to landfill by 2026</td> <td>Not known</td> </tr> <tr> <td><u>Hazardous</u></td> <td><u>Included in LACW, C&I and C&D targets</u></td> <td><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>	Surrey (Rep 39-4/6)
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>																					
6.5	<p>The chosen approach for the NLWP following the option appraisal can be summarised as follows:</p> <div 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</p> <p>+ Maximising Recycling</p> <p>+ Net self-sufficiency for LACW, and C&I and C&D by 2026 and C&D by 2035 (including hazardous waste)</p> </div>	Surrey Rep 39-4/6																					

	= Quantity of waste to be managed	
6.10	<p>A capacity gap equivalent to two hectares of land has been identified for meeting North London's hazardous waste management need over the plan period, a small requirement of less than 2,500 tonnes per annum has also been identified for recovery of hazardous waste, but this figure is considered too small to plan for. While the North London Boroughs support the provision of hazardous waste facilities in appropriate locations, it is acknowledged that these facilities generally operate for a wider-than-local catchment area due to their specialist nature. The Boroughs will therefore work with the GLA and other boroughs across London to identify and meet a regional need.</p>	Surrey rep 39-4/6