HABITATS REGULATIONS ASSESSMENT OF THE NORTH LONDON WASTE PLAN (PROPOSED MODIFICATIONS TO THE SUBMISSION PLAN)

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Bittern, a qualifying species for the Lee Valley SPA

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1.0 INTRODUCTION

1.1 Article 6(3) of the European Habitats Directive dealing with the conservation of European protected sites states that:

'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subject to assessment of its implications for the site in view of the site's conservation objectives. In light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.'

1.2 The North London Waste Plan (hereafter referred to as 'the NLWP' or 'the Plan') is a Local Development Document (a 'Plan') and therefore under the terms of the Conservation of Habitats and Species Regulations 2017 is required to be subject to a Habitats Regulations Assessment (to be taken at least through the screening stage (Stage 1)).

1.3 European protected sites (the 'Natura 2000 Network') are of exceptional importance for the conservation of important species and natural habitats within the European Union. The purpose of Habitats Regulation Assessment (HRA) of land use plans is to ensure that protection of the integrity of European protected sites is an integral part of the planning process at a regional and local level. The network of European protected sites comprises Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites. Government guidance advises that potential SPAs (pSPA), candidate SACs (cSAC) and potential Ramsar (pRamsar) sites are also included in HRAs.

1.4 Habitats Regulation Assessments can be seen as having a number of discrete stages -

- Stage 1 - Screening
- Stage 2 – Appropriate Assessment
- Stage 3 – Assessment of Alternatives
- Stage 4 – Assessment where no alternatives are available

1.5 This document forms Stage 1 and 2 of the Habitats Regulation Assessment (HRA) process and contributes to the fulfilment of the Council's statutory duty as regards Article 6(3).

1.6 The 'People Over Wind' case established that mitigation measures for potential effects on European sites which could arise from the implementation Plans and Projects cannot be taken into account at the Screening stage. The judgement concludes that 'an analysis of the measures capable of avoiding or reducing any significant effects on the site concerned must be carried out not at the screening stage, but specifically at the stage of appropriate assessment'.

Article 6(3) of the Habitats Directive must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate

assessment of the implications, for a site concerned, of a plan or project, it is not appropriate at the screening stage to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site.

The distinction as to whether something is integral or embedded into the Plan or Project and can therefore be applied at the Screening stage, or needs to be considered as mitigation and therefore needs to be considered at the Assessment stage, remains unclear.

1.7 Previous iterations of the NLWP have been subject to Screening and Assessment under the terms of the Habitats Regulations. In previous comprehensive screening and assessment exercises the Policies and Sites in the previous Plan(s) were 'considered to have no harmful impacts on European Sites, providing that certain safeguards and mitigation measures were applied'.

1.8 The Greater Manchester Ecology Unit (GMEU), on behalf of Capita, has prepared this Screening Opinion and Assessment. Natural England and the JNCC were consulted for information on the conservation objectives and favourable condition tables for the European Sites concerned (the information is summarised in Appendix 1 below).

1.9 This report has first Screened the Policies and Priority Areas being put forward for potential inclusion in the North London Waste Local Plan ('the Plan') for potential 'likely significant effects'. Where without mitigation a potential significant effect cannot be ruled out Appropriate Assessment is required and has been carried out. Only if this Assessment concludes no significant effect can the NLWP be lawfully adopted.

The report -

- Identifies by a screening process any European site that could potentially be affected by the operations covered by the Plan.
- Identifies potential impacts on the important nature conservation features of the identified European sites that may occur from the implementation of the Plan by assessing potential sources, pathways and receptors for harmful impacts to occur
- Assesses any identified potential impacts and Assesses available mitigation measures for these identified impacts
- Discusses 'in-combination' impacts

1.10 Interpretation of 'likely significant effect'

1.10.1 Relevant case law helps to interpret when effects should considered as a 'likely significant effect'

1.10.2 In the Waddenzee case the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive, including that –

- An effect should be considered 'likely' "if it cannot be excluded on the basis of objective information, that it will have a *significant* effect on the site"
- An effect should only be considered significant if it undermines the conservation objectives of the European site concerned. The conservation objectives of the European site therefore need to be understood.

- Where a plan of project will have an effect on a site but is not likely to undermine its conservation objectives it cannot be considered likely to have a significant effect on the site concerned.

1.10.3 An opinion delivered to the Court of Justice of the European Union commented that:

"*The requirement that an effect in question be 'significant' exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to caught by Article 6(3) of the Directive activities on or near the site would risk being impossible by reason of legislative overkill*"

1.10.4 This opinion (the 'Sweetman' case) therefore allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered to be trivial or *de minimis*; referring to such cases as those 'which have no appreciable effect on the site'. In practice such effects can be screened out as having no likely significant effect; they would be insignificant.

Therefore it is not necessary for the competent authority to show that the Waste Plan will result in no effects whatsoever on any European sites. Instead, the competent authority is required to show that the Waste Plan, either alone or in combination with other plans and projects, will not result in an effect which undermines the conservation objectives of one or more qualifying features.

1.11 <u>Mitigation Provided by other Policies in the Plan and in other Plans and Strategies and the Planning Hierarchy</u>

1.11.1 Some of the potential effects of the waste plan on European sites could be 'mitigated' through the implementation of other Policies in the plan itself, or in other relevant Plans and Strategies.

1.11.2 There does not appear to overall agreement as to whether such Policies should be regarded as integrated or embedded avoidance measures, in which case they can be considered at the Screening stage, or whether they are better thought of as mitigation measures, in which case (according to the *People over Wind* case) they cannot be considered at the Screening stage and must be included in an Assessment. Mindful of the People over Wind case, this HRA has considered other Policies in the Plan and in other Plans and Strategies to be mitigation and has therefore taken them into account in the Assessment stage of the HRA.

1.11.3 In applying the Stage 2 – Appropriate Assessment the relevant Authority must also consider whether there is a relevant planning mechanism (which may apply at a different level of the planning hierarchy) which can secure the necessary mitigation via either conditions or obligations.

1.11.4 In the case of a high level Strategic Plan the level of detail in land use plans concerning developments that will be permitted under the Plan at some time in the future is rarely sufficient to allow the fullest quantification of potential adverse effects. It is therefore necessary to be cognisant of the fact that HRAs for plans can be tiered, with assessments being undertaken with increasing specificity at lower

tiers. This is in line with DCLG guidance and court rulings that the level of detail of the assessment, whilst meeting the relevant requirements of the Habitats Regulations, should be 'appropriate' to the level of plan or project that it addresses.

Government guidance says:

"*The scope and content of an appropriate assessment will depend on the nature, location, duration and scale of the proposed plan or project and the interest features of the relevant site. 'Appropriate' is not a technical term. It indicates that an assessment needs to be proportionate and sufficient to support the task of the competent authority in determining whether the plan or project will adversely affect the integrity of the site*."

That is, the Plan must make every effort to ensure that no Policies or Allocations will cause harm to the special nature conservation interest of European sites but where some doubt remains as to whether harm will occur the plan must show that sufficient safeguards will be in place in other levels of the planning hierarchy to ensure that no harm will be caused to the special interest of European sites.

On these occasions the advice of Advocate-General Kokott to the European Court of Justice is worth considering. She commented that:

"*It would …hardly be proper to require a greater level of detail in preceding plans [rather than planning applications] or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the Plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure*"

2.0 THE PLAN BEING ASSESSED

2.1 The seven North London boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest are working together to produce the North London Waste Plan (the 'NLWP'). The NLWP also covers part of the area of the London Legacy Development Corporation (LLDC), a Mayoral Development Corporation, which is the planning authority for a small part of Hackney and Waltham Forest.

2.2 The NLWP has two main purposes:

- to ensure there will be adequate provision of suitable land to accommodate waste management facilities of the right type, in the right place and at the right time up to 2035 to manage waste generated in North London; and

- to provide policies against which planning applications for waste development will be assessed, alongside other relevant planning policies/guidance.

2.3 It will cover all principal waste streams including:

- Local Authority Collected Waste (LACW)
- Commercial and Industrial (C&I)
- Construction, Demolition & Excavation (CD&E)
- Hazardous
- Agricultural waste
- Waste Water / Sewage Sludge
- Low level radioactive waste

2.4 The NLWP will sit within the suite of local planning policy documents of each of the London Boroughs. The NLWP must be in general conformity with the London Plan and consistent with other documents in borough Local Plans. The NLWP should be read alongside other relevant policies within the wider Development Plans. In particular the Mayor of London published a draft London Plan for consultation in December 2017. The Examination in public is expected to begin in January 2019 with adoption scheduled for 2020. The London Plan sets the strategic framework for the NLWP.

2.5 Each of the seven boroughs has a strategic waste policy as part of their Local Plan. The boroughs' strategic waste policies defer to the NLWP to provide a more detailed planning framework for waste development across the seven boroughs. Each borough's Local Plan may also include site allocation documents, development management policies and area action plans, as well as supplementary planning documents.

3.0 THE HRA PROCESS SO FAR

3.1 A Habitat Regulations Assessment (HRA) Screening Report of the potential effects of the draft Combined Waste Plan for North London document, and the Submission version of the Plan, on the *Natura 2000* network has already been undertaken

(*GMEU 2016 and GMEU2019*). The Policies and Sites within the pre-submission draft of this Plan were 'screened out' as not requiring a full Appropriate Assessment.

3.2 The previous HRA concluded that no likely significant effects would arise [on European sites] from the implementation of the policies in the previous iteration of the Plan or from the development of the waste sites put forward for consideration (existing and proposed), either alone or in combination with other projects and plans.

3.3 As already discussed more recent case law has established that where, without mitigation, a potential significant effect cannot be ruled out, appropriate assessment is required.

3.4 The Assessment of the the new Combined Waste Plan (submission version) was been undertaken from fundamental principles taking into account the results of the consultation exercise and involves a comprehensive review of both Policies and potential waste Priority Areas. This HRA has therefore been undertaken from first principles.

3.5 This version of the HRA takes into account Modifications to the Plan proposed following an Examination in Public of the Submission version of the Plan.

4.0 IDENTIFICATION OF RECEPTORS, SOURCES AND PATHWAYS

4.1 A Habitat Regulations Assessment must, as a starting point, identify –

- Possible **receptors** (that is, European Protected sites that could potentially be affected by the implementation of the Plan).
- Potential **sources** of harm to the special nature conservation interests of European protected sites that could arise from the implementation of the Plan
- Potential **pathways** between sources and receptors

Only where there are receptors, sources and pathways are significant effects likely to occur.

4.2 IDENTIFICATION OF EUROPEAN DESIGNATED SITES CONCERNED (THE RECEPTORS)

4.2.1 This Assessment has first screened European protected sites to decide which of these sites, and which important nature conservation features within these sites, are most likely to be affected by the operation of the North London Waste Plan. When assessing the impact of a Plan on European protected sites it is important to consider the impact on sites not only within the operational area covered by The Plan but also those which fall outside the Plan boundary, as these could still potentially be affected by the implementation of the Plan.

4.2.2 As a useful starting point, the Assessment has considered the suite of European sites assessed within Habitat Regulations Assessments of other, adopted Local Plans in and around London and taken into account the most important potential sources of harm to these European sites.

4.2.3 Following the methodologies adopted in other London development plans, and considering guidance issued by the Environment Agency with regard to impacts associated with waste management facilities (Environment Agency, 2008), only *Natura 2000* sites within 10km of the NLWA operational area have been 'scoped into' this Assessment.

4.2.4 These are -

- **Lee Valley SPA and RAMSAR site**
- **Epping Forest SAC**
- **Wormley-Hoddesdon Park SAC**

4.2.5 In undertaking the HRA of the Waste Plan the screening exercise and appropriate assessment has considered the conservation objectives and interest features of the above European sites. Full details of the important nature conservation features and nature conservation objectives of the above relevant European Sites are set out in Appendix 1 of this Report.

4.2.6 Any other European Protected Sites have been reasonably discounted from the Assessment because they are considered too distant from the Plan area for any harmful impacts to arise. The Environment Agency has advised that waste developments can be reasonably discounted from Assessment if they lie more than 10km from the boundary of a European site, because harmful effects are considered

unlikely to occur or will have become so diffuse that impacts cannot be reasonably assessed.

4.3 SOURCES AND PATHWAYS

4.3.1 Potential sources for effects on European sites arising from development implemented as a result of a Waste Plan adoption are considered to include:

- Direct land take
- Diffuse and localised air pollution including dust and odour
- Noise disturbance
- Light spill or shading
- Human presence/disturbance (arising from recreation and residential developments)
- Emissions to water (surface or ground water) containing pollutants
- Ground water depression or flow interception
- Inundation
- Decrease in surface water run-off e.g. through interception
- Introduction and spread of invasive species
- Introduction and spread of pathogens

Of the above, the following impacts will not occur and have been Screened Out of the Assessment –

- Direct Land Take
- Light spill or shading
- Human presence / disturbance (arising from recreation and residential developments)
- Inundation

Of the above the following sources have been Screened In to the Assessment –

- Diffuse and localised air pollution including dust and odour
- Noise disturbance
- Emissions to water (surface or ground water) containing pollutants
- Ground water depression or flow interception
- Decrease in surface water run-off e.g. through interception
- Introduction and spread of invasive species
- Introduction and spread of pathogens

4.3.2 A discussion of the main likely identified sources Screened In to the Assessment follows. This discussion is to establish a context for the subsequent Assessment, to provide a level of reasoned justification for why particular sources have been Assessed and why the conclusions have been reached about potential impacts and available mitigation within the Assessment.

Air Pollution

4.3.3 Air pollution has been linked to ill health amongst trees; particularly over-mature specimens, and also a failure of trees to regenerate, either from coppice, pollard or seed. Air pollution has been at least in part attributed to the failing condition of parts of Epping Forest SAC, one of the European sites screened in to this Assessment.

Eutrophication (nutrient enrichment) of sensitive habitats through atmospheric deposition is a widely acknowledged phenomenon, although it is extremely difficult to measure or to pinpoint sources and pathways as the effects of eutrophication are often hidden by changes in local nutrients (i.e. via direct fertilisation) or by changes in grazing pressure. However it is know that both Epping Forest SAC and the Lee Valley SPA currently exceed 'critical levels' for nitrogen deposition, predominantly resulting from direct fertilisation and sewage. Nutrient enrichment changes the composition of plant species communities and can lead to rare species being out-competed. Nutrient enrichment typically causes plant communities to become less diverse. At very high levels direct harm to plants is caused.

4.3.4 Waste sites (particularly incinerators and landfill sites) can contribute to the atmospheric pollution load through emission of the following pollutants:

- Methane (CH_4) - Methane is produced when organic matter is broken down in the absence of oxygen and large quantities are produced by livestock, the spreading of animal manure and landfill sites. It is estimated that waste treatment, including landfill, released nearly 22% of the UK's methane emissions in 2003, about 2% of all greenhouse gas emissions (in terms of carbon equivalents).

- Carbon Dioxide (CO_2) - Carbon dioxide is one of the major combustion products from burning fossil fuels. It is also produced in certain non-combustion chemical reactions, for instance in the manufacture of cement. Carbon dioxide is a long-lived pollutant and will remain in the atmosphere for between 50 and 200 years. Carbon dioxide contributes to the greenhouse effect.

- Oxides of Nitrogen (NOx) - Oxides of nitrogen are formed during high temperature combustion processes from the oxidation of nitrogen in the air. The principal source of oxides of nitrogen is road traffic, which is responsible for approximately half the emissions in Europe. NOx concentrations are therefore greatest in urban areas where traffic is heaviest. High levels of nitrogen dioxide and nitrogen monoxide can directly damage plant life. Nitrogen dioxide also contributes to the formation of acid rain which can cause damage to vegetation, buildings and water bodies. Nitrogen dioxide is also involved in the formation of ground level ozone which damages vegetation and other materials. Nitrogen dioxide can react with other air pollutants to form peroxyacetyl nitrates (PANs) which can then carry reactive and potentially damaging nitrogen-containing compounds for long distances. Oxides of nitrogen can also cause harm to human health and are therefore controlled through legislation controlling air pollution.

- Ammonia (NH_3) – This is probably the major source of nitrogen deposition causing harm to many wildlife sites, and is primarily agricultural in origin (predominantly from animal manures), although it is also produced through some industrial process and by the composting of organic matter on some waste sites. Issues with composting occur when high-nitrogen products (e.g. manures) are

being added to compost and the compost is not being managed (turned) regularly. Biofilters fitted to commercial composting operations can be effective in preventing excessive ammonia release by adsorption/absorption mechanisms.

- Sulphur dioxide (SO_2) – this is an acidic gas that combines with water vapour in the atmosphere to produce acid rain. Both wet and dry depositions have been implicated in the damage and destruction of vegetation and in the degradation of soils and watercourses. Major SO_2 problems now only tend to occur in cities in which coal is still widely used for domestic heating, in heavy industry and in power stations.

- Low-level ozone (O_3) – this is unlike the other pollutants mentioned, in that it is not emitted directly into the atmosphere, but is a secondary pollutant produced by a complex reaction between nitrogen dioxide (NO_2), hydrocarbons and sunlight. Unlike the other pollutants, it cannot therefore be directly related to increases in traffic etc. Although *peak* levels of ozone are generally reducing, annual *average* levels are generally increasing.

- Hydrogen chloride and hydrogen fluoride (HCl and HF) – Both of these chemicals are produced in small amounts as a result of certain energy from waste facilities, principally incineration. HF is the most phytotoxic of all air pollutants. It accumulates in very high concentrations in the margins of leaves. In sensitive species this may lead to distortion of the leaf shape, chlorosis (yellowing), red colouration and, in extreme cases, death of tissues. HCl can also have local, direct, effects on plants, but there is little information available about dose-response relations.

- Dioxins - These are long-lived organic compounds, which form when chlorinated substances in the waste, such as PVC plastic, are burnt and accumulate in the human food chain. Dioxin emissions to air from incinerators are thought to have decreased significantly in recent years. Four sources account for 74% of the total air emissions. These are legal municipal waste incineration (26%), sinter plants (18%), residential wood combustion (boilers, stoves, fireplaces, 16%) and incineration of hospital waste (14%). The incineration of hazardous industrial waste contributes less than 1%.

- Heavy metals – specifically Cadmium (Cd), which is a normal constituent of soil and water at low concentrations. The main sources of cadmium emissions are from waste incineration, and iron and steel manufacture. Cadmium and other heavy metals are mainly present in the ash produced by incinerators, but some is released directly to atmosphere via the exhaust stack. Emissions of cadmium have declined substantially over recent years; this is mainly attributable to the decline in coal combustion to generate power. Environmentally, cadmium is dangerous because many plants and some animals absorb it easily and it becomes concentrated in tissues.

4.3.5 For the following reasons, only NOx and ammonia are considered further as specific pollutants (sources) in this Assessment:

- Despite the general association with nitrogen dioxide, ozone levels are not as high in urban areas (where high levels of nitrogen dioxide are emitted) as in rural areas. This is largely due to the long-range nature of this pollutant, which is

sufficiently great that the source of emission and location of deposition often cross national boundaries. As such, low-level ozone can only be practically addressed at the national and international level.

- Sulphur dioxide concentrations are overwhelmingly influenced by the output of power stations and industrial processes that require the combustion of coal and oil. They are not particularly linked to waste operations.

- There is an enormous range in sensitivity to hydrogen chloride and hydrogen fluoride between species and habitats, and there are no commonly available critical levels for avoidance of visible injury to vegetation. Coupled with the fact that quantities of these pollutants emitted by incinerators will typically result in ground-level concentrations lower than the concentration that will harm vegetation, these chemicals are not considered further in this assessment.

- As with ozone, the distance from emission to deposition of dioxins can be many hundreds of miles, potentially crossing trans-national boundaries, and is dependent upon meteorological conditions. Most importantly, amounts of dioxins formed in incinerators do not depend on chlorine levels, but primarily on the design and operating temperatures of the facility. It is therefore not possible to consider dioxin emissions in detail within this assessment because this would need details of particular facilities to be available. Further, given the large distances over which dioxins can cause harm, it can be difficult to link particular sources with particular receptors. Dioxins are only emitted by incineration and that incinerators are required by law to control their dioxin emissions below set thresholds.

- Since ammonia is of relevance to European sites primarily through its effect upon nitrogen deposition, it is not considered independently of nitrogen deposition in this assessment.

4.3.6 The most acute impacts of NOx take place close to where they are emitted, but individual sources of pollution will also contribute to an increase in the general background levels of pollutants at a wider scale, as small amounts of NOx and other pollutants from the pollution source are dispersed more widely by the prevailing winds.

4.3.7 The main sources of NOx in the UK are –

- Road and other transport (approximately 47%; greater in urban areas);
- Public power generation using fossil fuels (22%).
- Combustion in industrial processes (14%).
- Domestic and commercial sources (4%), e.g. commercial boilers in schools, hospitals etc.

4.3.8 By far the largest contribution to NOx will generally be made by the road traffic movements associated with new waste facilities. Waste sites may generate increases in traffic although the level of increase will depend upon the nature and size of the facility. It is therefore not possible at this stage of Plan production to accurately estimate the amount of additional road traffic that will be generated by a new or extended waste facility. The level of traffic increase will depend on the details of the nature of the facility, the size of the facility and the expected use of the facility.

But it has been shown that at distances greater than 55 metres from the kerbside, ground level concentrations of NOx represent less than 1% of the critical levels that could cause harm to vegetation. According to the Department of Transport's Transport Analysis Guidance, "*Beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant*". The Environment Agency has agreed that if levels of nitrate deposition are below 1% of the predicted background levels then they can be considered to be insignificant in HRAs. This has been taken into account in the Assessment.

Air Pollution and the Thermal Treatment of Waste

4.3.9 Thermal treatments are processes which convert residual waste or RDF/SRF into a more useable form of energy such as heat or electricity. These processes include incineration, gasification (including plasma gasification) and pyrolysis; potential air pollutants resulting from thermal treatment include sulphur dioxide, nitrogen oxides, dioxins and particulates.

4.3.10 Any thermal treatment development will be subject both to development control through the land-use planning process and through a strict regulatory Licensing process. The two processes of planning and permitting can happen one after another or at the same time. The Environment Agency is the permitting authority in England and emissions from thermal treatment plants are very strictly controlled. What can be emitted into the atmosphere from an energy from waste plant has for a number of years been tightly controlled under the Waste Incineration Directive (2000/76/EC). There are stringent limits for a number of potential pollutants, as well as demanding operating requirements which help to minimise pollution, that apply to all plants thermally treating waste whatever the technology. These requirements have been recast virtually unchanged into the Industrial Emissions Directive (2010/75/EU).

Public Health England has assessed the possible impacts of thermal treatment of waste on public health and has determined that any effects are likely to be 'not detectable' (*source – Energy from Waste, Defra 2014).*

4.3.11 There is a concern that oxides of nitrogen in emissions from thermal treatment plants could lead to nutrient enrichment of soils which in turn can affect plant communities. In the case of the European sites most likely to be affected by this Plan Epping Forest and Wormley-Hoddesdon Park Woods are known to be susceptible to air pollution. The nearest priority area proposed for thermal treatment of Waste in the Plan is within 5km of Epping Forest. Since it is not possible to exclude any likely significant effect without mitigation this potential impact is screened in for appropriate assessment.

Dust from Waste Sites

4.3.12 Dust may arise from certain waste operations (e.g. stone, rubble and brick recycling). Effects of dust will depend on the prevailing wind direction and the transport distance is related to particle size; large particles (>30um) will mostly deposit within 100m of the source, intermediate particles (10-30um) are likely to travel up to 200 - 500m. Smaller particles (<10um) can travel up to 1km from the source. Dust size and chemical composition is important as smaller particles can enter or block plant leaf stomata and thus interfere with gas exchange, while sufficient coverage may prevent light penetration to the leaves. In prolonged cases of significant dust deposition plant death can result.

4.3.13 At this stage of Assessment dust impacts cannot readily be quantified beyond the broad potential distances identified above for different particle sizes. For the purposes of HRA, those waste sites that lie more than 500m from a European site may effectively be 'screened out' as being very unlikely to contribute significant dust impacts. Of the European sites concerned, the nature conservation interests of the Lee Valley SPA associated with wetland habitats are not considered to be particularly susceptible to dust pollution. Control of dust on industrial and waste sites is controlled by a statutory regime administered by the Environment Agency.

Nevertheless taking a precautionary approach potential waste sites within 500m of one of the European sites concerned have been 'Screened In' for further Assessment.

Water Pollution and Water Flows

4.3.14 Water pollution can have a harmful effect on habitats and species. At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour.

4.3.15 Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, augmenting the oxygen depleting effects of eutrophication.

4.3.16 Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life.

4.3.17 Water quality may be adversely affected by waste sites through:

- Pollution through water runoff from hard surfaces carrying oils, heavy metals and/or de-icing compounds. While these effects can be dispersed throughout the downstream water catchment, they will be most visibly manifested within tens of metres to a few hundred metres of the site

- Discharges of leachate from landfill sites can add ammonia, other nutrients and chemical pollutants to surface water bodies. Leachate can also penetrate groundwater. Leachate can escape from landfill sites by leakage through a barrier / containment system, 'break out through a cap, or overtopping containment.

4.3.18 In the area affected by the North London Waste Plane the **Lee Valley European site** can be regarded as having a particular hydrological sensitivity. The Lee Valley SPA / RAMSAR is dominated by inland standing water that is vulnerable to water pollution, in particular to eutrophication. Important qualifying species associated with the Lee Valley include *Botaurus stellaris* (Bittern), *Anas clypeata* (Shoveler duck) and *Anas Strepera* (Gadwall). These bird species are vulnerable to water pollution because water pollution affects food sources.

The most important source of water pollution in the Lee Valley arises from 'grey-water' and sewage arising from domestic sources.

4.3.19 There are a number of sites that have been put forward as potential waste sites in the NLWP that have some degree of hydrological connectivity with the Lee Valley (Table 6.1). Potential effects are therefore screened in.

Species Disturbance from Noise

4.3.20 Waste sites can share many noise and visual disturbance issues (e.g. heavy vehicle movements and loud machinery) with other industrial operations. **Birds** are the faunal group that is most often considered in relation to disturbance, largely as this is the group on which disturbance impacts have been most studied.

4.3.21 Disturbance effects are of particular concern for the Lee Valley because the qualifying species include bird species that can be vulnerable to increased disturbance. Further, sites in the Lee Valley are already subject to relatively high levels of disturbance.

4.3.22 Concern regarding the effects of disturbance on bird's stems from the fact that they are expending energy unnecessarily and that the time they spend responding to disturbance is time that is not spent feeding. Disturbance therefore risks increasing energetic output while reducing energetic input, which can adversely affect the 'condition' and ultimately survival of the birds. In addition, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they have to sustain a greater number of birds. Moreover, the more time a breeding bird spends disturbed from its nest, the more its eggs are likely to cool and the more vulnerable they are to predators.

4.3.23 Human activity can affect birds either directly (e.g. through causing them to flee) or indirectly (e.g. through damaging their habitat). The most obvious direct effect is that of immediate mortality such as death by shooting, but human activity can also lead to behavioural changes (e.g. alterations in feeding behaviour, avoidance of certain areas etc.) and physiological changes (e.g. an increase in heart rate) that, although less noticeable, may ultimately result in major population-level effects by altering the balance between immigration/birth and emigration/death.

4.3.24 Disturbing activities are on a continuum. The most disturbing activities are likely to be those that involve irregular, infrequent, unpredictable loud noise events, movement or vibration of long duration. Birds are least likely to be disturbed by activities that involve regular, frequent, predictable, quiet patterns of sound or movement or minimal vibration. The further any activity is from the birds, the less likely it is to result in disturbance.

4.3.25 The factors that influence a species response to a disturbance are numerous, but the three key factors are -

- species sensitivity,
- proximity of disturbance sources and
- timing/duration of the potentially disturbing activity.

4.3.26 The distance at which a species takes flight when approached by a disturbing stimulus is known as the 'tolerance distance' (also called the 'escape flight distance') and differs between species to the same stimulus and within a species to different stimuli. No data can be sourced on the tolerance distances of birds in response to waste sites specifically, although the regular mechanized noise that is associated with waste sites is likely to be less disturbing than the presence of visible human activity in areas in which the birds are not used to observing such activity because birds can become habituated to regular predictable noise.

4.3.27 For the purposes of this HRA a precautionary distance of 1km has been used as a basis on which to screen waste sites in or out of consideration with regard to the potential for disturbance (i.e. noise and visual) impacts.

4.3.28 In terms of potential disturbance effects it is of note that the Lee Valley SPA is already well regulated through 'zoning' of water bodies within the Lee Valley Regional Park. The majority of the site is already managed in accordance with agreed management plans, and with disturbance impacts fully taken into account, in which nature conservation is a high or sole priority.

Direct land take

4.3.29 Issues of direct land take from terrestrial European sites generally relate to existing permissions that were granted prior to the designation of the site and which have not yet reached completion. New applications would be subject to the most recent development management policy regime.

4.3.30 None of the sites being put forward for consideration as potential waste sites in this iteration of the Plan being assessed involve direct land take of a European designated site.

Invasive Species and Changes to species communities

4.3.31 Waste Sites have the potential to introduce aggressive alien species (e.g. Japanese knotweed) to areas where they have not occurred previously because large volumes of waste and contaminated material are transported from many disparate areas into concentrated areas. If not properly controlled within the boundaries of the waste site these species may be spread into the wider landscape.

4.3.32 This source of harm can be effectively dealt with effectively through the existing system of statutory controls placed on waste disposal sites and by existing legislation controlling the spread of alien invasive species (Wildlife and Countryside Act 1981 as amended). Well-managed and well-controlled waste sites will not result in the spread of invasive species.

Pathogens

4.3.33 In theory some composting sites may result in the production or spread of plant pathogens, which if released into the environment may result in adverse effects on vegetation within European sites located close to the facility. It has been agreed with Natural England that a precautionary screening distance of 1km from European Sites be applied to such facilities for risks from pathogens.

4.4 Conclusions

4.4.1 Based on the reasoning in the above discussion the following **sources** have been taken forward for consideration in this Assessment.

Table 4.1 Screening - potential sources of harm and distances from European Sites at which impacts can effectively be screened out

Source/Pathway	Screening Distance from European Site
Air pollution – vehicle exhausts	200m
Air pollution – energy from waste	10km
Disturbance	1km
Water pollution	5km
Pathogens	1km
Dust	500m

4.4.2 Since the Plan identifies general 'priority areas' for waste management rather than individual sites the distance thresholds have been measured taking a precautionary approach and taking the distance from the boundary of the priority area rather than the boundary of a particular site.

5 CONSIDERATION OF AVAILABLE MITIGATING POLICIES IN PLANS AND STRATEGIES

5.1 Carrying out this Assessment is just one part of the protection regime in place to avoid any possible harm to European Sites. European designated sites are robustly protected through a hierarchy of European and National statute, government guidance and Land-use Planning Policies (including the newly revised NPPF), Strategic Plans (*e.g.* the London Plan) and Local Development Plans. Controls in these Plans and Strategies will serve to prevent (avoid) harm and to mitigate for any potentially harmful impacts that may arise from the implementation of the NLWP and are therefore considered to be relevant to this Screening Report and worthy of mention here.

The National Planning Policy Framework (NPPF, July 2018)

5.2 The NPPF states –

> *"When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:*
>
> - *if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
>
> - *development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest;*
>
> *[SACs, SPAs and Ramsar sites are invariably also designated as SSSIs*]

5.3 The Draft London Plan

The HRA of the draft London Plan (AECOM, November 2017) concludes that

"The HRA of the London Plan has identified that several amendments to policy or matters of direction to boroughs (particularly those around Epping Forest SAC) are required. However, once those matters are addressed it is considered that this report can be updated to conclude that there are sufficient protective mechanisms in place to ensure that the growth objectives of the London Plan can be delivered without a likely significant effect on European sites, either alone or in combination with other plans and projects".

The suggested amendments to Policies within this HRA were predominantly related to the need for Policies to refer specifically to a requirement for Appropriate Assessments to be undertaken of certain types of development. In the case of the NLWP this requirement has already been met (in Policy 5)

5.4 Current Iteration of the NLWP (submission document)

One of the Strategic Objectives of the NLWP (SO8) is –

> "To protect and, where possible, enhance North London's natural environment, biodiversity, cultural and historic environment":

Policy 5 of the Plan states that –

> "***Applications for waste management facilities and related development, including those replacing or expanding existing sites, will be required to demonstrate to the satisfaction of the relevant Borough that the development has no adverse effect on the integrity of an area designated under the Habitats Directive and no significant adverse effect on local biodiversity or water quality***"

In the justifying text for the above Policy it is specifically stated (at paragraph 9.44) that –

> "***Development that would have an adverse effect on any area designated under the Habitats Directive will not be permitted***"

The proposed modifications to the Plan (August 2020) proposes some changes to the wording of Policy 5 –

~~Waste developments should be~~ Criteria 5j seeks ~~designed~~ to protect and enhance local **biodiversity**. Development proposals will be assessed against this policy as well as other relevant principles and policies set out in the NPPF and Borough Local Plans. […]

This proposed change does not alter the aim of the Policy to specifically protect biodiversity, including the special biodiversity importance of European Sites. The Policy therefore remains relevant as an integrated embedded measure mitigating any potential effects on the special interest of European sites.

5.5 Adopted Local Plans, Core Strategies and Development Plans

Relevant Policies in Local Plans of the NLWP Boroughs that will serve to protect European Sites are listed and described in **Appendix 3**.

6.0 Screening of Plan Policies

Table 6.1 Initial Screening of Plan Policies

Policy Reference	Policy Description	Screening Outcome
1 **Existing Waste Management Sites**	Safeguards existing and allocated waste sites and allows for expansion or intensification of operations at existing waste sites. Resists development proposals which would prevent or prejudice the use of existing or allocated sites.	The Policy has the potential, without safeguards, to cause harm to European sites within 10km of the existing and allocated sites depending on the type of expansion / intensification planned. Screened IN
2 **Priority Areas for New Waste Management Facilities**	Identifies new priority areas suitable for waste management. 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 Policy has the potential, without safeguards, to cause harm to European sites within 10km of the proposed areas depending on the type of facility / operation planned. Screened IN
3 **Windfall Sites**	Allows for waste operations to be applied for on sites outside of those identified in Policies 1 and 2, subject to a strict hierarchy and selection criteria. By definition the locations of windfall sites and the types of waste operation that would be allowed in such sites are not able to be defined.	The Policy has the potential, without safeguards, to cause harm to European sites within 10km of any proposed windfall sites depending on the type of facility / operation planned. Screened IN
4 **Re-use and Recycling Centres**	Allows for the establishment of re-use and recycling centres providing that the centres are in line with other policies in the Plan	The Policy has the potential, without safeguards, to cause harm to European sites within 10km of any proposed re-use and recycling centres Screened IN
5 **Assessment criteria for waste management facilities and related development**	Sets out a range of stringent assessment criteria for waste management and related development. The Policy includes the criteria that "*the development has no adverse effect on the integrity of an area designated under the*	This Policy will provide strict protection to European sites. Screened OUT

	Habitats Directive and no significant adverse effect on local biodiversity or water quality"	
6 **Energy recovery and decentralised energy**	Allows for waste developments to generate energy and/or recover excess heat (including the recovery of energy from gas) and provide a supply to networks including decentralised energy networks.	The Policy has the potential, without safeguards, to cause harm to European sites within 10km of any proposed energy-from-waste centres Screened IN
7 **Waste Water Treatment Works and Sewage Plant**	Allows for the provision of new facilities for the treatment of waste water, subject to other policies in the Plan, although no potential sites/areas for such facilities are identified	The Policy has the potential, without safeguards, to cause harm to European sites within 10km of any proposed waste water treatment centres Screened IN
8 **Control of Inert Waste**	Allows for development using inert waste where the proposal is both essential for, and involves the minimum quantity of waste necessary	The Policy has the potential, without safeguards, to cause harm to European sites within 10km of any proposed development using inert waste Screened IN

Table 6.2 Assessment of Plan Policies Screened In to the Assessment taking into account available safeguards / /embedded measures / mitigation

Policy	Available Safeguards / Mitigation	Assessment Outcome
1 **Existing Waste Management Sites**	National and International Legislation, **Policy 5 of the NLWP**, requirements of the London Plan (as amended), requirements and Policies in Local Plans, Regulations controlling the operation of waste facilities	Providing that available safeguards and mitigation measures are applied no adverse effect on the special nature conservation interests European designated sites will occur
2 **Priority Areas for New Waste Management Facilities**	National and International Legislation, **Policy 5 of the NLWP**, requirements of the London Plan (as amended), requirements and Policies in Local Plans, Regulations controlling the operation of waste facilities	Providing that available safeguards and mitigation measures are applied no adverse effect on the special nature conservation interests European designated sites will occur
3 **Windfall Sites**	National and International Legislation, **Policy 5 of the NLWP**, requirements of the London Plan (as amended), requirements and Policies in Local Plans, Regulations controlling the operation of waste facilities	Providing that available safeguards and mitigation measures are applied no adverse effect on the special nature conservation interests European designated sites will occur
4 **Re-use and Recycling Centres**	National and International Legislation, **Policy 5 of the NLWP**, requirements of the London Plan (as amended), requirements and Policies in Local Plans, Regulations controlling the operation of waste facilities	Providing that available safeguards and mitigation measures are applied no adverse effect on the special nature conservation interests European designated sites will occur
6 **Energy recovery and decentralised energy**	National and International Legislation, **Policy 5 of the NLWP**, requirements of the London Plan (as amended), requirements and Policies in Local Plans, Regulations controlling the operation of waste facilities in particular thermal waste treatment plants	Providing that available safeguards and mitigation measures are applied no adverse effect on the special nature conservation interests European designated sites will occur

7 **Waste Water Treatment Works and Sewage Plant**	National and International Legislation, **Policy 5 of the NLWP**, requirements of the London Plan (as amended), requirements and Policies in Local Plans, Regulations controlling the operation of waste water treatment facilities	Providing that available safeguards and mitigation measures are applied no adverse effect on the special nature conservation interests European designated sites will occur
8 **Control of Inert Waste**	National and International Legislation, **Policy 5 of the NLWP**, requirements of the London Plan (as amended), requirements and Policies in Local Plans	Providing that available safeguards and mitigation measures are applied no adverse effect on the special nature conservation interests European designated sites will occur

THE APPLICATION OF POLICY 5 OF THE NLWP IS KEY TO AVOIDING HARM TO THE SPECIAL NATURE CONSERVATION INTEREST OF EUROPEAN SITES

7.0 Screening of Priority Areas for new waste management facilities (Policy 2)

Notwithstanding the fact that it has been concluded above that Policy 2 ought not have any significant effects on the qualifying features of European sites providing that embedded safeguarding policies are applied, taking a precautionary approach potential new sites and areas being considered as waste sites are considered in more detail below.

7.1 Screening Methodology

Potential new waste areas were plotted on GIS in relation to the location and extent of relevant European Sites and the potential impacts of the development of these sites as waste sites was assessed using the following criteria –

- Distance from relevant European Sites
- Size and Scale of the Site concerned
- Context of the site
- Previous and Current Site Uses
- Identification of potential Pathways

The above 'desk-top' process relied on information concerning sites and areas collected and collated during wider site assessments undertaken by Urban Vision [Capita] on behalf of the Boroughs, on GIS analysis, on ecological information concerning the European Sites concerned. All sites and areas more than 10km from the boundary of European protected sites have been screened out of the Assessment.

Areas short-listed by the above process as having some potential to impact on the special nature conservation interest of European Sites were then visited to assess on the context of the sites on the ground and to assess potential Pathways.

In the following tables 'Screened Out' should be taken to mean that development of the Area Assessed as having potential to accommodate a waste facility will not have any impact on the special nature conservation interest of relevant European Sites. 'Screened In' should be taken to mean that the development of Area Assessed as having potential to accommodate a waste facility has been initially screened as having some potential to have an impact on the special nature conservation interest of relevant European Sites and therefore a further Assessment has been carried out.

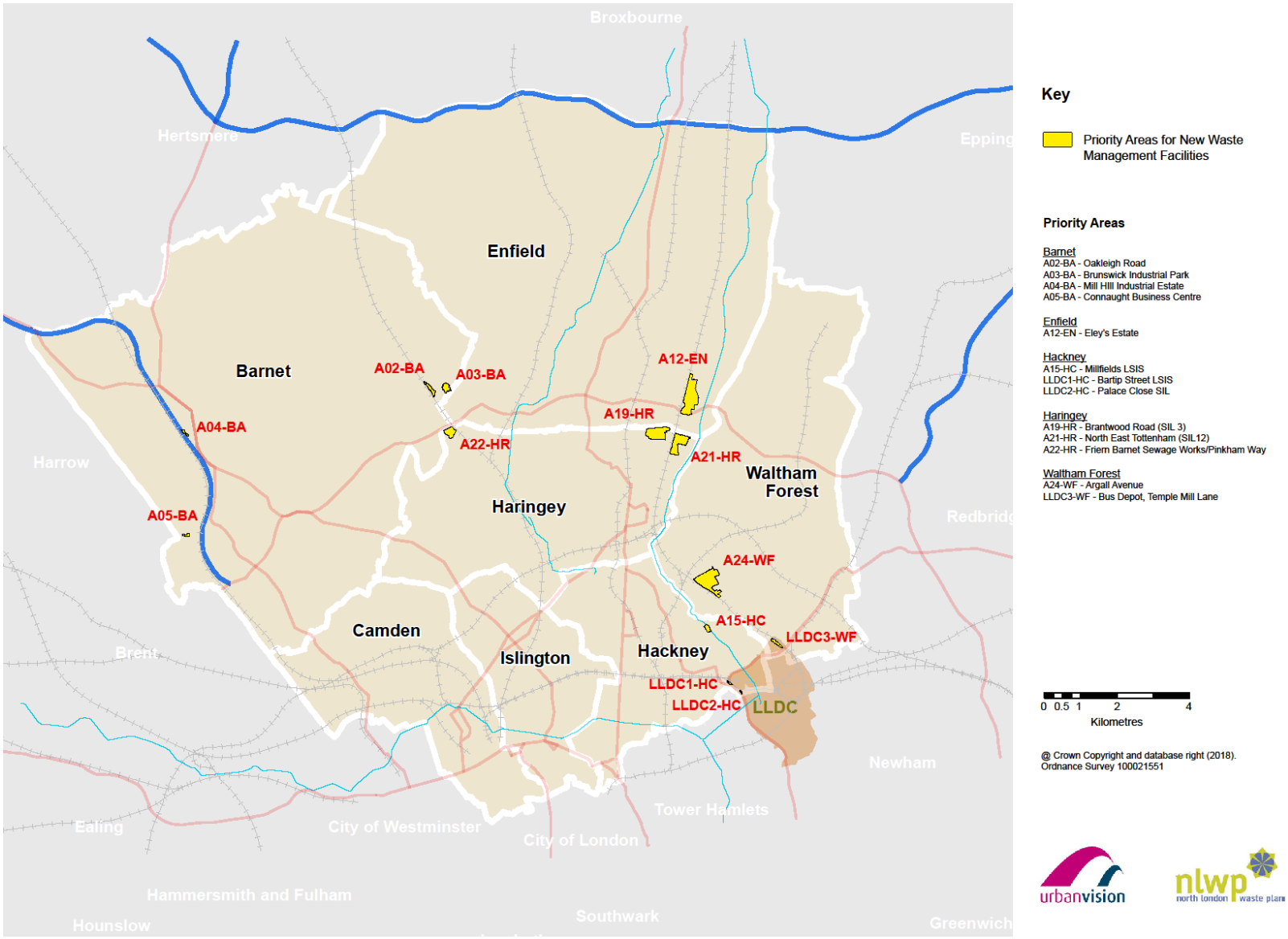


Fig 1 Locations and Distribution of proposed New Areas

7.2 RESULTS OF SCREENING OF PRIORITY WASTE AREAS (NEW AREAS)

Table 7.1 Initial Screening of potential new priority waste areas (those within 10km of a European designated site)

Site reference	Site Name	Available Details	HRA Screening Comments	Initially Screened In/Out
A12-EN	Eleys Estate	Large site, current industrial / commercial use including existing waste management facilities including 'Edmonton Eco Park' complex.	Potential hydrological connectivity to the Lee Valley SAC	**In – Lee Valley**
A19-HR	Brantwood Road	Large industrial / commercial site	No apparent direct connectivity to any SPA/SAC but within 1km of the SPA (pathogens and disturbance effects apply)	**In – Lee Valley**
A21-HR	North-East Tottenham	Large existing industrial / commercial site	Potential hydrological connectivity to the Lee Valley SPA and within 500m of the Lee Valley (potential impacts from dust)	**In – Lee Valley**
A24-WF	Argall Avenue	Large industrial / commercial site	Within 1km of the Lee Valley SPA (potential impacts from dust) and with potential hydrological connectivity.	**In – Lee Valley**
LLDC2-HC	Chapman Road LSIS	Current Industrial / residential site.	Although within 5km of the Lee Valley there are no apparent hydrological connections	**Out**
LLDC1-HC	Bartrip Street	Small-scale industrial, storage and distribution uses	Although within 5km of the Lee Valley there are no apparent hydrological connections	**Out**
LLDC3-WF	Temple Mills Lane	Existing commercial/industrial site	Within 5km of the Lee Valley SPA but located downstream – no hydrological pathway exists	**Out**
LLDC2-HC	Chapman Road (Palace Close)	Existing industrial and commercial properties	Although within 5km of the Lee Valley there are no apparent hydrological connections	**Out**

Assessment of those priority areas 'screened in' to the assessment in table 7.1

Pathogens and Disturbance – Assessment of short-listed sites

Table 7.2 Priority Areas within 1km of a European Site such that any possible impact from pathogens could occur.

Site ref.	Site Name	Assessment of potential effects from pathogens and disturbance taking into account available safeguards / mitigation	Conclusion of Assessment
A19-HR	Brantwood Road	A large existing industrial area surrounded by built development (mainly residential). Context of the site makes increased disturbance to the SPA very unlikely. Given the proximity of residential uses close by the site has been ruled out for use as a composting location.	**Site can be screened out for these effects**
A21-HR	North-east Tottenham	A large existing industrial area surrounded by built development (mainly residential). Context of the site makes increased disturbance to the SPA very unlikely. Given the proximity of residential uses close by the site has been ruled out for use as a composting location.	**Site can be screened out for these effects**
A24-WF	Argall Avenue	An existing large industrial / commercial area surrounded by built development (mainly residential). Context of the site makes increased disturbance to the SPA very unlikely. Given the proximity of residential uses close by the site has been ruled out for use as an open windrow composting location.	**Site can be screened out for these effects**

7.3 Air pollution – assessment of short-listed sites

7.3.1 Only three sources of potential air pollution have been assessed in this Report – emissions from thermal treatment sites, pollution from traffic increases and dust pollution.

7.3.2 In terms of pollution from traffic and pollution from dust only the area at North-east Tottenham is close enough to the SPA at Lee Valley to potentially cause any harm, although the habitats in the Lee Valley are not considered to be particularly susceptible to the effects of air pollution (*source – APIS*)

7.3.3 Of the European sites screened in as potential Receptors Epping Forest SAC and Wormley-Hoddesdon Park Woods SAC are known to be most susceptible to long-range air pollution such as may arise from a thermal treatment facility.

7.3.4 In terms of Wormley-Hoddesdon Park Woods SAC this site is more than 6 km from the nearest potential waste site (E01) and separated from it by very significant areas of built development and transport infrastructure, not least the M25. The SAC is more than 10km from the nearest proposed thermal treatment site. Any effects of diffuse air pollution that may arise from the operation of a waste facility would therefore be imperceptible whether in an individual or cumulative basis.

7.3.5 In terms of Epping Forest SAC at its closest point this SAC is only some 3 km from the nearest proposed thermal treatment site (Edmonton). But this is an existing thermal treatment facility already subject to very stringent controls with an approved DCO. New Thermal waste treatment sites will be subject to stringent controls on emissions from any new facility would be required in addition to the existing Policy framework. It can be concluded that with the operation of these controls the plans proposals will not give rise to any adverse effects.

Table 7.3 Further Assessment – air pollution

Site ref.	Site Name	Assessment of potential effects from pathogens and disturbance	Conclusion of Assessment and Recommendations
A21-HR	North East Tottenham	This site is less than 50m from the Lee Valley SPA although the habitat present in this part of the SPA (open water) is not considered to be particularly susceptible to air pollution. Recommend a dust management regime and a traffic management plan be required of any application as part of a required development-specific HRA.	**Site can be included for consideration but development-specific HRA should be required in line with Policy 5**

7.4 Water pollution – assessment of short-listed areas

Waste management activities require Licensing from the Environment Agency. The following extracts from guidance prepared by the Environment Agency for consideration of water pollution effects on European designated sites are relevant to this part of the Assessment -

Water pollution (leachate)

The polluting effects of leachate are well known. New sites dealing with any waste other than inert waste must operate on a containment basis, unless a risk assessment justifies otherwise. Impermeable surfaces and a sealed drainage system would be the norm at transfer / treatment facilities, with detailed barrier systems and leachate collection facilities at landfill sites.

It should be noted that the Landfill Regulations 2002 require appropriate collection and treatment of leachate and the provision of barrier systems which must be the subject of permit conditions [Regulation 8(3)(a)(I) and Schedule 2]. The standards chosen must be justified on the basis of risk assessment, including consideration of the European site as a receptor. As a landfill permit is a relevant authorisation under the Groundwater Regulations (being a PPC permit) there is an obligation to prevent discharges of List I substances to groundwater, and to prevent groundwater pollution by List II substances. These are 'pre-requisite' permit conditions.

Water pollution – surface water

Extent and impact

Surface water may become contaminated by contact with waste and leachate, construction materials, or chemicals used on site (fuels, pesticides, etc). The resulting water may be toxic, nutrient rich, or may carry a load of suspended solids that could lead to siltation. The physical passage of water may lead to scouring and erosion. While these effects can be dispersed throughout the downstream water catchment, they will be most visibly manifested within tens of metres to a few hundred metres of the site.

Surface water management systems should be installed at all waste sites, with the aim of segregating 'clean, uncontaminated water' from potentially contaminated water. The contaminated water should be subject to appropriate treatment (on site or via sewer), prior to release to the environment. The manner of all discharges may need to be controlled to prevent erosion or siltation.

A range of control measures can be deployed to prevent siltation consisting either of filtration (e.g. swales, straw bales) or settlement (e.g. catch pits or lagoons), or a combination of both. Scouring and erosion (& the consequent siltation) can be prevented by appropriate design of the surface water management system, such as controlling the gradient of flow paths, providing a liner system to ditches, or directing flow via swales with vegetation cover.

***Source** - Work Instruction Further Guidance applying the Habitats Regulations to Waste Management Facilities (EA, 2005).*

Table 7.4 Further Assessment – water pollution

Site reference	Site Name	HRA Screening Comments – Water Pollution and Potential Mitigation	Conclusions of Assessment and Recommendations
A24-WF	Argall Avenue	Within 1km of the Lee Valley SPA and with potential hydrological connectivity. Site is being considered for relatively small-scale use as a waste transfer and recycling facility and potentially for closed-vessel composting. Credible tried and tested pollution control methods are available such that any risk of water pollution can be mitigated. Any future development would be subject to stringent water pollution controls applied during any development control and/or licensing process such that harmful impacts on the Lee Valley can be avoided. Relevant policies, statutory controls and guidance relevant in this regard include – • Policy 5 of the NLWP • The EU Water Framework Directive • Pollution control policies in Local Plans • Requirements of Licensing processes for waste operations regulated by the EA • Pollution prevention Guidelines published by the EA • The Lee Valley Management Plan • Policy protection given to European Sites in the Waste Plan	**Site can be included for consideration but development-specific HRA should be required in line with Policy 5**
A12-EN	Eleys Estate	Potential hydrological connectivity to the Lee Valley SPA through drainage leading to Pymmes Brook. Credible tried and tested pollution control methods are available such that any risk of water pollution can be mitigated. Any future development would be subject to stringent water pollution controls applied during any development control and/or licensing process such that harmful impacts on the Lee Valley can be avoided. Relevant policies, statutory controls and guidance relevant in this regard include – • Policy 5 of the NLWP • The EU Water Framework Directive • Pollution control policies in Local Plans • Requirements of Licensing processes for waste operations regulated by the EA • Pollution prevention Guidelines published by the EA • The Lee Valley Management Plan • Policy protection given to European Sites in the Waste Plan	**Site can be included for consideration but development-specific HRA should be required in line with Policy 5**

A21-HR	North-east Tottenham	Potential hydrological connectivity to the Lee Valley via Pymmes Brook. Credible tried and tested pollution control methods are available such that any risk of water pollution can be mitigated. Any future development would be subject to stringent water pollution controls applied during any development control and/or licensing process such that harmful impacts on the Lee Valley can be avoided. Relevant policies, statutory controls and guidance relevant in this regard include – • Policy 5 of the NLWP • The EU Water Framework Directive • Pollution control policies in Local Plans • Requirements of Licensing processes for waste operations regulated by the EA • Pollution prevention Guidelines published by the EA • The Lee Valley Management Plan • Policy protection given to European Sites in the Waste Plan	**Site can be included for consideration but development-specific HRA should be required in line with Policy 5**

8 SCREENING OF SITES – EXISTING SITES AND AREAS

Policy 1 of the NWLP allows for the possible expansion and/or intensification of use of existing waste transfer sites and facilities.

These sites already have established use as waste sites and are regulated and where applicable licensed as such. The existing land use cannot be rescinded. None of the sites has been identified as having had any detrimental effects on the special nature conservation interests of any European sites; at least, the operation of these facilities has not been considered to be a particular harmful factor in condition assessments of any of the European sites concerned.

Policy 5 of the Plan, together with other relevant Policies, Regulations and Best Practice, will operate to manage any proposals for expansion and/or intensification of use of these existing sites to ensure that no harmful effects are caused to European sites.

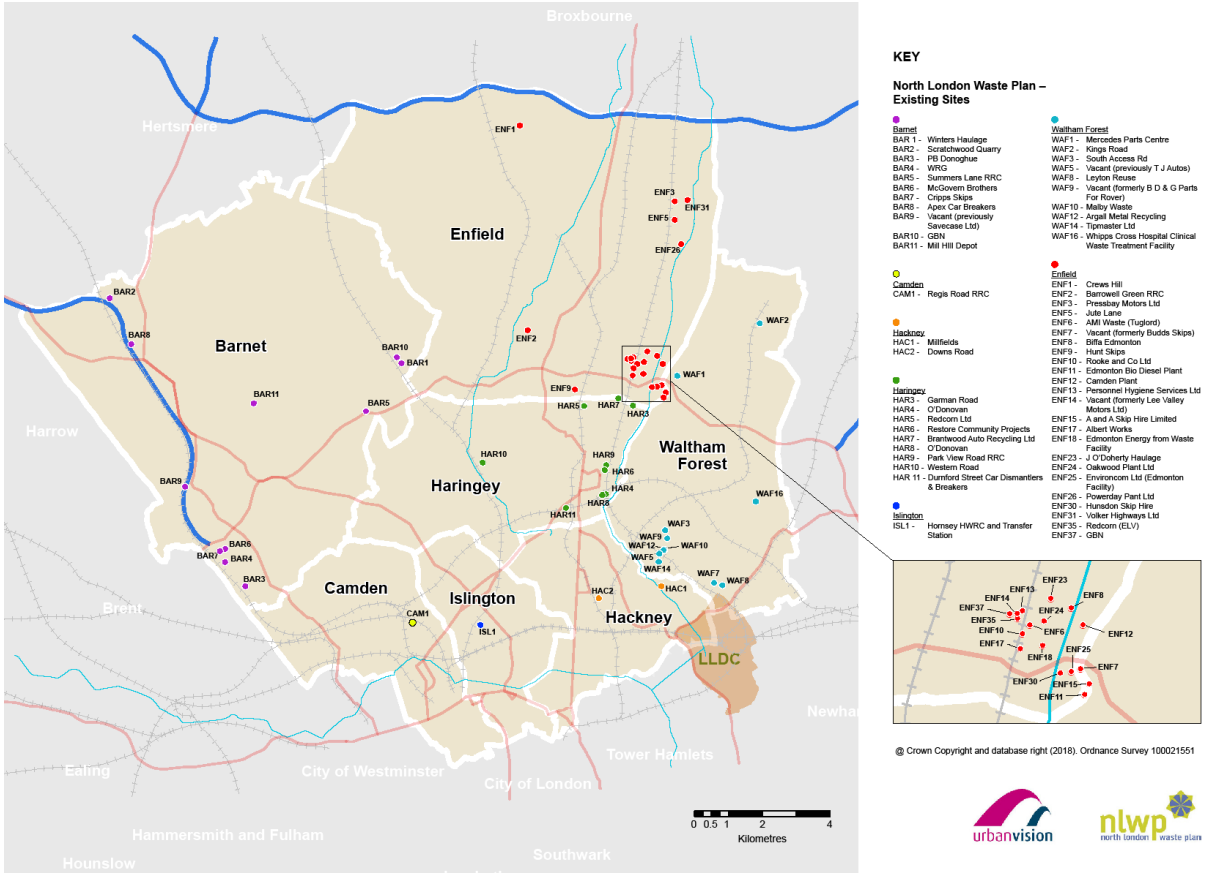


Fig 2 Locations of existing sites

9.0 IN COMBINATION EFFECTS WITH OTHER PLANS AND POLICIES

9.1 It is a requirement of the Habitats Directive that an analysis undertaken of whether there is scope for an interaction with other relevant projects and plans that may result in a likely significant effect 'in combination'.

9.2 The Assessment needs to be proportionate to the Strategic nature of the NLWP. In the case of the Waste Plan it is therefore considered that the key other strategic plans and projects that should be considered with regard to their interaction with the NLWP are:

- The Core Strategies/Local Plans for the NLWP boroughs
- The Mayor's London Plan. Borough Local Plans and the NLWP are required to be consistent with higher level Plans, making them mutually re-enforcing.
- The Mayor's Transport Strategy
- The Mayor's Economic Development Strategy
- The Lee Valley Park Development Framework
- The South London Waste Plan
- The Hertfordshire Joint Municipal Waste Management Strategy
- The Joint Municipal Waste Management Strategy for Essex
- Crossrail 2

9.3 All of the above Plans have been subject to independent Habitats Regulations Assessment and all contain safeguards against any potential harm that may be caused by operations controlled by the Plans to European protected Sites.

9.4 It is therefore concluded that there will be no additional impacts on European sites arising from the implementation of the Waste Plan arising from the Plan acting in combination with other Strategic Plans.

10.0 CONCLUSIONS AND RECOMMENDATIONS

10.1 Any potential harmful impacts on the nature conservation value of European sites that could arise from the implementation of the North London Combined Waste Plan can be avoided or mitigated.

Providing that available safeguards and mitigation measures are effectively applied the implementation of the NLWP there will not be any adverse effects on the special nature conservation interest of any designated European Sites

10.2 Policy 5 of the Plan provides an important safeguard for European sites.

10.3 It is not considered to be necessary to remove any sites from the list of sites being considered for potential waste operations from the Plan because of potentially harmful impacts on European protected sites.

10.4 Some sites will need to be subject to further, development-specific and more detailed Assessment under the terms of the Regulations as they come forward.

11.0 REFERENCES

Scott Wilson (2006) Appropriate Assessment of the Draft South East Plan, Scott Wilson Levett Threivel, October 2006.

Environment Agency (2008) Environmental Permitting Regulations, H1 Environmental Risk Assessment Part 1.

English Nature (1997) Habitats Regulations Guidance note (HRGN1), The Appropriate Assessment (Regulation 48), The Conservation (Natural Habitats & c) Regulations, 1994.

DCLG (2006) Planning for the Protection of European Sites: Appropriate Assessment Guidance for Regional Spatial Strategies and Local Development Documents, DCLG, August 2006.

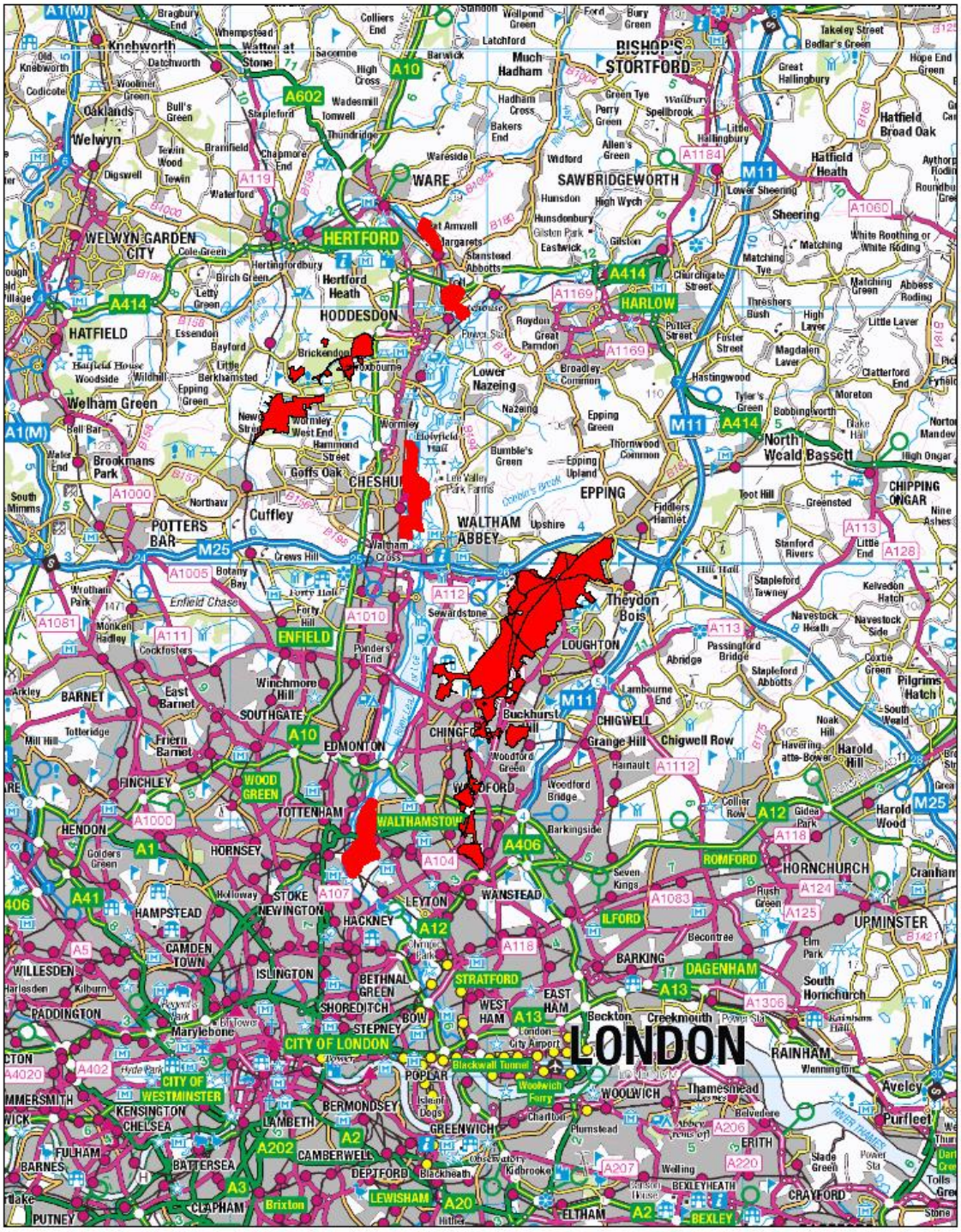
The North London Waste Plan Habitats Regulations Assessment: Screening Submission Statement February 2012

The Habitats Regulations Assessment Handbook DTA Publications 2015 (and additions)

Advanced Thermal treatment of Waste –Defra Guidance 2013

Environment Agency Work Instruction (Appendix 6) : Further Guidance applying the Habitats Regulations to Waste Management Facilities (EA, 2005).

MAPS and FIGURES


LONDON
HERTFORD
WELWYN GARDEN CITY
HATFIELD
WARE
SAWBRIDGEWORTH
HODDESDON
HARLOW
EPPING
WALTHAM ABBEY
ENFIELD
CHESHUNT
POTTERS BAR
BARNET
EDMONTON
TOTTENHAM
WALTHAMSTOW
WOOD GREEN
HORNSEY
FINCHLEY
HENDON
SOUTHGATE
CHINGFORD
WOODFORD
LOUGHTON
CHIGWELL
ROMFORD
HORNCHURCH
UPMINSTER
ILFORD
BARKING
DAGENHAM
RAINHAM
WANSTEAD
LEYTON
HACKNEY
STOKE NEWINGTON
ISLINGTON
CAMDEN TOWN
HAMPSTEAD
WILLESDEN
PADDINGTON
CITY OF WESTMINSTER
CITY OF LONDON
KENSINGTON
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BATTERSEA
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LAMBETH
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STEPNEY
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STRATFORD
WEST HAM
EAST HAM
BECKTON
CREEKMOUTH
WOOLWICH
GREENWICH
DEPTFORD
LEWISHAM
CAMBERWELL
ELTHAM
BEXLEY
CRAYFORD
ERITH
THAMESMEAD
PURFLEET
AVELEY
SOUTH HORNCHURCH
BECONTREE
THEYDON BOIS
NORTH WEALD BASSETT
CHIPPING ONGAR
WELHAM GREEN
BROOKMANS PARK
CUFFLEY
GOFFS OAK
WORMLEY
BRICKENDON
HERTFORD HEATH
LOWER NAZEING
HASTINGWOOD
HATFIELD HEATH
HATFIELD BROAD OAK
BISHOP'S STORTFORD
SHEERING
MATCHING
HIGH ONGAR
CHIGWELL ROW
GRANGE HILL
BUCKHURST HILL
SOUTH WOODFORD
WOODFORD BRIDGE
BARKINGSIDE
HAROLD WOOD
HAROLD HILL
GIDEA PARK
COLLIER ROW
NOAK HILL
HAVERING ATTE BOWER
PILGRIMS HATCH
SOUTH WEALD
NAVESTOCK
NAVESTOCK SIDE
STAPLEFORD TAWNEY
STAPLEFORD ABBOTTS
PASSINGFORD BRIDGE
ABRIDGE
THEYDON BOIS
FIDDLERS HAMLET
TOOT HILL
GREENSTED
STANFORD RIVERS
LITTLE END
KELVEDON HATCH
CHIPPING ONGAR
HIGH ONGAR
NORTH WEALD BASSETT
THORNWOOD COMMON
EPPING GREEN
EPPING UPLAND
BUMBLE'S GREEN
NAZEING
LOWER NAZEING
BROADLEY COMMON
GREAT PARNDON
ROYDON
HARLOW
CHURCHGATE STREET
GILSTON
EASTWICK
HUNSDON
HIGH WYCH
HUNSDONBURY
GILSTON PARK
ALLEN'S GREEN
LITTLE HALLINGBURY
GREAT HALLINGBURY
TAKELEY STREET
BEDLAR'S GREEN
HOPE END GREEN
HATFIELD BROAD OAK
HATFIELD HEATH
LOWER SHEERING
SHEERING
MATCHING
MATCHING TYE
WHITE ROOTHING OR WHITE RODING
MATCHING GREEN
ABBESS RODING
LITTLE LAVER
MAGDALEN LAVER
HIGH LAVER
THRESHERS BUSH
PUTTERS STREET
FOSTER STREET
CLATTERFORD END
MORETON
BOBBINGWORTH
TYLER'S GREEN
HASTINGWOOD
BROADLEY COMMON
GREAT PARNDON
ROYDON
PINNEY'S GREEN
WIDFORD
PERRY GREEN
SPELLBROOK
GREEN TYE
WALLBURY
BISHOP'S STORTFORD
HADHAM CROSS
BAKERS END
MUCH HADHAM
LITTLE HADHAM
WATTON AT STONE
STAPLEFORD
TOMWELL
THUNDRIDGE
WADESMILL
HIGH CROSS
BARWICK
SACOMBE
COLLIERS END
WELLPOND GREEN
LATCHFORD
STANDON
WARESIDE
CHAPMORE END
WATERFORD
BRAMFIELD
TEWIN WOOD
TEWIN
DIGSWELL
WELWYN
OAKLANDS
BULL'S GREEN
WOOLMER GREEN
CODICOTE
OLD KNEBWORTH
KNEBWORTH
BRAGBURY END
WHEMPSTEAD
DATCHWORTH
COLE GREEN
HERTINGFORDBURY
BIRCH GREEN
LETTY GREEN
HERTFORD HEATH
ESSENDON
BAYFORD
LITTLE BERKHAMSTED
BERKHAMSTED
HATFIELD HOUSE
WOODSIDE
WILDHILL
EPPING GREEN
NEWGATE STREET
WORMLEY WEST END
HAMMOND STREET
BELL BAR
WATER END
BROOKMANS PARK
NORTHAW
SOUTH MIMMS
POTTERS BAR
CUFFLEY
CROUCH HILL
BOTANY BAY
ENFIELD CHASE
WROTHAM PARK
MONKEN HADLEY
COCKFOSTERS
FRIERN BARNET
EAST BARNET
TOTTERIDGE
MILL HILL
ARKLEY
HENDON
GOLDERS GREEN
HOLLOWAY
HAMPSTEAD
CAMDEN TOWN
WILLESDEN
KILBURN
HARLESDEN
PADDINGTON
MARYLEBONE
HYDE PARK
KENSINGTON
CHELSEA
FULHAM
BARNES
PUTNEY
BATTERSEA
CLAPHAM
BRIXTON
LAMBETH
BERMONDSEY
SHOREDITCH
BETHNAL GREEN
STEPNEY
POPLAR
STRATFORD
WEST HAM
EAST HAM
BECKTON
CREEKMOUTH
WOOLWICH
GREENWICH
DEPTFORD
LEWISHAM
CAMBERWELL
ELTHAM
BEXLEY
CRAYFORD
ERITH
THAMESMEAD
PURFLEET
AVELEY
SOUTH HORNCHURCH
BECONTREE
BARKING
DAGENHAM
RAINHAM
WENNINGTON
UPMINSTER
HORNCHURCH
ROMFORD
ILFORD
WANSTEAD
LEYTON
HACKNEY
STOKE NEWINGTON
ISLINGTON
CAMDEN TOWN
HAMPSTEAD
WILLESDEN
PADDINGTON
CITY OF WESTMINSTER
CITY OF LONDON

APPENDIX A

Details of relevant European Sites (qualifying features, adapted from information available from Natural England and the JNCC)

A1 Lee Valley SPA / RAMSAR

The Lee Valley SPA is located to the north-east of London, where a series of wetlands and reservoirs occupy about 20 km of the valley. The site comprises embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that support a range of man-made, semi-natural and valley bottom habitats. These wetland habitats support wintering wildfowl, in particular Gadwall *Anas strepera* and Shoveler *Anas clypeata*, which occur in numbers of European importance. Areas of reedbed within the site also support significant numbers of wintering Bittern *Botaurus stellaris.*

Qualifying species

This site qualifies under **Article 4.1** of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:

Over winter;

Bittern *Botaurus stellaris*, 6 individuals representing at least 6.0% of the wintering population in Great Britain (5 year peak mean, 1992/3-1995/6)

This site also qualifies under **Article 4.2** of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:

Over winter;

Gadwall *Anas strepera*, 515 individuals representing at least 1.7% of the wintering Northwestern Europe population (5 year peak mean 1991/2 - 1995/6)
Shoveler *Anas clypeata*, 748 individuals representing at least 1.9% of the wintering Northwestern/Central Europe population (5 year peak mean 1991/2 - 1995/6)

Notes on Management and Protection

Sympathetic management of water levels within the main water body is necessary for the maintenance of optimal water depths throughout the year (according to the requirements of the plant and animal species present). For example, the presence of extensive shallow water and wet marginal substrates will provide the feeding conditions required by a variety of wintering, passage and breeding wildfowl, such as dabbling ducks and waders, whilst other species may require areas of water at least 3 metres in depth. Water level management should take into account the requirements of submerged aquatic plants that are restricted to areas where there is sufficient light for growth and minimal wave action. In shallow waterbodies (with an average water depth of less than 3 metres) plants may be able to grow throughout the waterbody, whilst in deeper waters plants will be restricted to the shallow margins.

Management should aim to maintain the habitats associated with shallowly sloping margins that are not too exposed to wave action as they are important for many species associated with standing open waters. For example, the maintenance of structural diversity within and between stands of aquatic vegetation (including emergent, floating and submerged vegetation) can provide important habitat for the immature stages of different dragonfly and damselfly species that require a wide variety of vegetation types.

The protection of appropriate water quality is important for maintaining aquatic habitats and the range of species associated with them. Increases in the amount of nutrients within the waterbody (as a result of pollution from direct discharges and also from diffuse sources resulting from land management practices within the wider catchment) can lead to a loss of aquatic plants in favour of algae and impact upon invertebrate species, both of which are important food sources for a range of wetland birds. Changes to the amount of water within the waterbody (by abstracting water from inflowing streams or raising the water level) can also alter nutrient regimes, as well as change the available area of some habitats. Increases in the amount of sediment entering a waterbody may smother stony beds, reduce water depth in shallow waterbodies and also increase the amount of nutrients present and should therefore be avoided. Other activities that can lead to a decrease in aquatic plants in favour of algae include the control or removal of the natural aquatic vegetation, or the intentional or accidental introduction of species such as bottom feeding coarse fish that uproot plants and disturb sediments on the bottom of the waterbody.

In common with other freshwater systems, artificial waterbodies are susceptible to the introduction of invasive species such as non-native crayfish or plant species, for example, Australian swamp stonecrop, and some management may be necessary to control these where they occur. Where native crayfish are present any measures which may limit the risks of transferring non-native crayfish or crayfish plague (such as information and awareness-raising initiatives amongst visitors to the waterbody) should be encouraged. Standing waters and their surroundings are often also a popular environment for recreational activities such as angling and boating which should be managed sympathetically to avoid conflict with the management of the waterbody for nature conservation.

Other wetland habitats surrounding the open water may require some active management. For example, management should ensure that appropriate nesting and feeding conditions are maintained across the site for breeding, wintering and passage birds. This might include the maintenance of some open areas with unrestricted views and ensuring any sparsely-vegetated islands, bars and margins retain an open character and are kept free of invading vegetation. For example, exposed areas of bare ground should be maintained to provide nesting sites for breeding terns where present. Alternatively, areas of lush, dense marginal and emergent vegetation should be retained where they are important for nesting birds. Large areas of wetland should be kept free from disturbance during the breeding season, as well as during the winter months. Dragonflies and damsel flies require the maintenance of a mosaic of open habitats such as grassland, reedbed and fen with plentiful herbs, scrub and small trees to provide ideal hunting habitat, as well as basking and perching sites that are open to direct sunlight but sheltered from the wind.

A2 Epping Forest SAC

Epping Forest is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain and has retained habitats of high nature conservation value including ancient semi-natural woodland, old grassland plains and scattered wetland. The semi-natural woodland is particularly extensive, forming one of the largest coherent blocks in the country. Most is characterised by groves of overmature pollards and these exemplify all three of the main wood-pasture types found in Britain: beech-oak, hornbeam-oak and mixed oak. The Forest plains are also a major feature and contain a variety of unimproved acid grasslands which have become uncommon elsewhere in Essex and the London area.
In addition, Epping Forest supports a nationally outstanding assemblage of invertebrates, a major amphibian interest and an exceptional breeding bird community.

The Forest lies on a ridge of London clay overlain in places by Claygate Beds and in the highest areas by Bagshot Sand and Pebble Gravel. In some of the southernmost areas, the sands and gravels on which the Forest lies are glacial in origin. This varied geology gives rise to a mosaic of soil types from neutral soils to acidic loams and from impervious clays to well-drained gravels. To a large extent these soil patterns have dictated the pattern of vegetation in Epping Forest.

Epping Forest was traditionally managed as wood-pasture in which the trees were lopped or 'pollarded' above the reach of browsing animals to produce a crop of wood. This practice also prolonged the life of individual trees and has created a distinctive woodland structure markedly different from that found under other forms of woodland management.
During the 19th century this traditional system of wood management declined and eventually ceased in 1878 under the Epping Forest Act.

The site includes several areas of open grassland. These vary from acid grassland transitional with relict heathland to mown neutral grassland but they all add to the habitat diversity of the Forest. Many are old plains, the result of the former management as wood pasture. Areas of acidic grassland transitional with heathland are generally dominated by a mixture of fine-leaved grasses, including red fescue *Festuca rubra*, mat-grass *Nardus stricta*, wavy hair-grass *Deschampsia flexuosa* and common bent *Agrostis capillaris*. In marshier areas, purple moor-grass frequently becomes dominant. Broad-leaved herbs typical of acidic grassland and heathland are frequent, including sheep's sorrel *Ruxem acetosella*, heath bedstraw *Galium saxatile*, Petty whin *Genista anglica*, slender rush *Juncus tenuis*, tormentil *Potentilla erecta*, and ling *Calluna vulgaris*. Sunshine Plain supports one of only very few examples of wet dwarf-shrub heath remaining in Essex and the London area. This contains both ling and cross-leaved heath *Erica tetralix* as well as sharp-flowered rush *Juncus acutiflorus*, bulbous rush *Juncus bulbosus*, heath rush *Juncus squarrosus*, common cotton-grass *Eriophorum angustifolium* and oblong and round-leaved sundew *Drosera intermedia* and *D. rotundifolia*. The last three plants do not grow in Essex outside Epping Forest. Other areas of acidic grassland include Long Running, Deershelter Plain, Strawberry Hill Gravels, Warren Hill Heath and Wanstead Flats. The botanical quality and size of many of these areas has declined owing to cessation of grazing and subsequent colonisation by birch, pedunculate oak, hawthorn and blackthorn. However, recent conservation management has been successful in regenerating grassland and

Qualifying habitats and species

Annex 1 Habitats

Epping Forest represents **Atlantic acidophilous beech forests** in the north-eastern part of the habitat's UK range. Although the epiphytes at this site have declined, largely as a result of air pollution, it remains important for a range of rare species, including the moss *Zygodon forsteri*. The long history of pollarding, and resultant large number of veteran trees, ensures that the site is also rich in fungi and dead-wood invertebrates

The Forest also supports areas of northern **Atlantic wet heaths** and **European dry heaths**

Species

Records of **stag beetle *Lucanus cervus*** are widespread and frequent; the site straddles the Essex and east London population centres. Epping Forest is also a very important site for fauna associated with decaying timber, and supports many Red Data Book and Nationally Scarce invertebrate species.

A3 Wormley-Hoddesdon Park SAC

Wormley Hoddesdonpark Woods in south-east England has large stands of almost pure hornbeam *Carpinus betulus* (former coppice), with sessile oak *Quercus petraea* standards. Areas dominated by bluebell *Hyacinthoides non-scripta* do occur, but elsewhere there are stands of great wood-rush *Luzula sylvatica* with carpets of the mosses *Dicranum majus* and *Leucobryum glaucum*. Locally, a bryophyte community more typical of continental Europe occurs, including the mosses *Dicranum montanum*, *D. flagellare* and *D. tauricum*.

This site supports wide range of habitats supports a variety of invertebrate species including the green tiger beetle *Cicindela campestris* of limited distribution in Hertfordshire, and several local species of butterfly and moth *Lepidoptera*. The woodland bird community exhibits equivalent diversity with all three woodpeckers, woodcock *Scolopax rusticola* and hawfinch *Coccothraustes coccothraustes* known to breed.

Annex I habitats that are a primary reason for selection of this site

Sub-Atlantic and medio-European oak or oak-hornbeam forests of the *Carpinion betuli*

Habitats Regulations Assessment of the North London Waste Plan

APPENDIX B - Addendum to HRA of Submission Draft: Assessment of Proposed Modifications

Prepared by GMEU September 2020

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Quality Management

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Document Title	**Post Examination in Public Habitats Regulations Assessment Addendum**		
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Version Date	**16/09/2020**	**Revision**	**03**
Prepared By	**Derek Richardson**	**Signature**	**DR**
Checked By	**Teresa Hughes**	**Signature**	

Introduction

1.1 A Habitats Regulations Assessment (HRA) of the (submission version) combined North London Waste Plan (NLWP) was prepared in 2019. The HRA concluded that, providing certain safeguards are implemented, the NLWP would not have any likely significant effects on any European designated sites.

1.2 Following completion of the subsequent Examination in Public (EiP) hearings and further correspondence between the Authority and the appointed Planning Inspector, a series of modifications are proposed to be made to the Submission draft NLWP. This document comprises an assessment of the implications of these proposed modifications for the HRA of the Submission draft Local Plan. The results of the assessment of the proposed main modifications are set out in this HRA addendum.

1.3 To put these results in context, they should be read alongside the assessment of the policies and priority areas for new waste sites prior to these modifications that are contained in the HRA of the Submission draft of the NLWP

North London Waste Plan: Main Modifications (August 2020) – implications for HRA

The following Main Modifications have been made in response to the issues raised at the public hearing held in November 2019.

They include:

- Proposed modifications made in January 2019 are shown with underline or ~~strike through~~
- Further modifications made after the public hearing in November 2019 are shown with underline and ~~strike through~~ and highlighted in grey

Reference	Section	Further modification	Implications for the Habitats Regulations
MM1	1.3	[…] **The Spatial Principles ~~Framework~~**: The spatial principles flow from the Strategic Objectives and provide the strategic direction for the detailed policies of the NLWP and inform site/area selection. ~~This sets out~~ They reflect the physical and planning components that influence the Plan and guide the ~~identifies~~ identification of opportunities and constraints for waste planning in North London.	None - introduction
MM2	3.3	Aim of the NLWP "To achieve net self-sufficiency* for LACW, C&I and C&D waste streams, including hazardous waste, seek beneficial use of excavation 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 identified waste management needs throughout the plan period". * Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste generated in North London, while recognising that some imports and exports will continue. Equivalent capacity will	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		be measured by the amount (tonnes) managed for each waste stream against the projected waste arisings in Table 8.	
MM3	3.4	The Strategic Objectives are the steps needed to achieve the Aim of the ~~draft~~ NLWP. They are delivered through the policies in the Plan and each Strategic Objective signposts the policy or policies through which it will be met. The Strategic Objectives are as follows: […] SO3. To plan for net self-sufficiency in LACW, C&I, C&D waste streams, including hazardous waste, by providing opportunities to manage as much as practicable of North London's waste within the Plan area taking into account the amounts of waste apportioned to the Boroughs in the London Plan, and the requirements of the North London Waste Authority, to seek beneficial use of excavation waste, and to monitor waste exports as part of the ongoing duty to co-operate. Met through Policies 1, 2, 3, 4, and 8 [footnote] ~~Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste generated in North London, while recognising that some imports and exports will continue.~~	None
MM4	2.27 [Moved here after 2.25]	The North London Boroughs are all focused on the challenges posed by climate change. Borough strategies are driven by the requirements to mitigate and adapt to all effects of climate change. The NLWP aims to deliver effective waste and resource management which makes a positive and lasting contribution to sustainable development and to combating climate change. In particular this includes reducing the reliance on disposal to landfill sites outside London, lowering CO2 emissions from road transport, ensuring new waste facilities generating energy meet the Mayor's Carbon Intensity Floor, directing new development to the most appropriate sites and taking into account the greater occurrence of urban flood events.	None – potential positive outcomes for European sites

Reference	Section	Further modification	Implications for the Habitats Regulations
MM5	4.2	The Spatial Principles ~~Framework~~ flow from the Plan's Strategic Objectives and provides ~~the~~ the strategic direction for the detailed policies of the NLWP and informs site/area selection. The principles take account of the spatial and wider policy context, the Plan's evidence base and the views of stakeholders. The Spatial Principles ~~Framework~~ also guide~~s~~ the assessment of the suitability of windfall sites under Policy 3. ~~It~~ They reflect~~s~~ the complexities and realities of planning at a sub-regional level taking into account varied characteristics and functions across the seven boroughs, from densely populated urban areas to stretches of Green Belt. Competing and changing land uses, especially release of industrial land for housing, is a key issue for the boroughs.	None
MM6	4.11 (part)	The current and changing character of each borough's industrial land is a consideration in identifying locations for new waste infrastructure. 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. Larger and co-located facilities are more suited to areas with similar existing uses away from sensitive receptors. A future waste industry focused on resource management may derive positive cumulative impacts from a concentration of facilities. Conversely, the urban environments of NLWP boroughs are restricted by severe physical constraints limiting opportunities for some types of waste facilities. In addition, ~~some areas, such as~~ most waste facilities would be regarded as inappropriate development in 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. As population and densities in the plan area increase with projected growth, fewer areas away from sensitive receptors will be available. Continued development of waste facilities in areas which have, and continue to provide, significant waste capacity could have wider implications on the regeneration of the local economy. When choosing locations for future development, the benefits of co-location will need to be balanced against the cumulative impacts which can arise from an accumulation of facilities in one location. Cumulative impacts can include traffic levels, noise and odours. There may be times when the cumulative impacts of several waste developments operating in an area would be considered unacceptable.	None
MM7	New after 4.11	Figure 9 shows that there is a concentration of existing waste sites in the Lee Valley corridor, mainly in Enfield. Indeed, Enfield contributes 62% of the land currently in waste use in North London, compared to 18% in Barnet,	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		12% in Haringey and 5% or less in the remaining Boroughs. The NLWP has the opportunity to address concerns that there is an over-concentration of waste facilities in Enfield by promoting a better geographic spread of sites across North London and create a more sustainable pattern of waste development.	
MM8	4.12	While all industrial land in North London is suitable 'in principle' for waste uses, there are certain locations which are more suitable than others to provide the waste capacity needed. Section 8 of the NLWP sets out how 'Priority Areas' for new waste facilities in North London were identified. One of the considerations was creating a better geographical spread, and this has been sought by limiting the number of Priority Areas within Enfield. The NLWP takes an area-based approach to waste planning and identifies certain industrial and employment areas as in principle more suitable for waste use but where the land is not specifically safeguarded for waste. The area-based approach allows for flexibility in bringing forward a range of locations across North London which is combined with policy to promote areas outside Enfield first (see Policy 2). This is supported by annual monitoring to check that land for waste capacity is being taken up as anticipated (see Chapter 10 monitoring indicator IN3). In addition the NLWP supports the intensification of existing waste facilities where appropriate to optimise their throughput (see Policy 1). [separate here to new para] ~~Policy 2 seeks to extend the existing spread of locations for waste facilities by identifying locations which are suitable for new waste facilities, taking into account~~ In combination, existing waste sites and the 'Priority Areas' are considered a sustainable network of waste facilities because they present sufficient opportunity to meet North London's waste capacity needs and net self-sufficiency targets while promoting a better geographical spread. They will help reduce movements of waste, including waste exports and increase opportunities for waste to be managed in proximity to its source. New waste facilities will be directed towards the most suitable land in North London when assessed against the planning criteria (see Table 10) as well as ~~factors such as~~ the character of different areas, changing land uses and availability of suitable industrial land. Policy 2 identifies these Priority Areas in Schedules 2 and 3. Outside of the Priority Areas, ~~W~~where demand arises, opportunities to improve the	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		spread of waste sites across the area are supported through Policy 3: Windfall Sites where they adhere to the site assessment criteria set out in section 8.	
MM9	New after 4.17	Co-location of facilities with complementary activities will be encouraged through Policy 2, which directs new waste uses to Priority Areas and provides a spatial focus towards land with similar existing uses away from sensitive receptors. Policy 3: Windfall Sites allows for opportunities of locating recycling facilities near to a reprocessing plant that could use the recyclate material. Policy 5 requires developers to consider the possible benefits of co-locating waste development as well as any potential cumulative impacts.	None – areas and in-combination effects have already been assessed
MM10	4.18	The NPPW recognises the benefits of co-location of waste facilities with end users of their energy outputs. The London Plan (March 2016) supports 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. The draft New London Plan (December 2019) Policy SI8 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 SI3 Part D1e). 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.	None – areas and in-combination effects have already been assessed
MM11	4.26	Road transport will continue to be the principal method of transporting waste in North London, particularly over shorter distances where this is more flexible and cost effective. The efficient use of transport networks combined with good logistics and operational practices can make a significant contribution towards the level of transport sustainability achieved. The transportation of waste as well as other traffic movements to and from sites can impact on amenity along the routes used. Policy 5 will seek to minimise such impacts where possible , for example through	None – likely positive impacts [on

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for the Habitats Regulations</th></tr>
<tr><td></td><td></td><td>the use of low emission vehicles. Access to transport networks including sustainable transport modes was considered when assessing the suitability of new sites and areas. Rail and road transport is particularly desirable when waste is travelling long distances. Policy 5 considers sustainable transport modes in planning decisions.</td><td>European sites]</td></tr>
<tr><td>MM12</td><td>New after 5.3</td><td>A Data Study Addendum (2020) was prepared to support the Main Modifications to the NLWP. The Data Study Addendum proposes modifications to the way data is presented in the NLWP so that the reader can more readily follow the line of justification and reasoning behind the approach to waste management in North London.</td><td>None – point of clarification</td></tr>
<tr><td>MM13</td><td>New after Fig 8</td><td>How North London’s waste is currently managed

Around 50% of waste generated in North London is managed in North London, and this rises to 66% if excavation waste is excluded from the total. The amounts of North London’s waste managed within North London and elsewhere is set out in Table 4. This section sets out how and where each waste stream is currently managed.</td><td>None</td></tr>
<tr><td>MM14</td><td>Revised Table 4</td><td>Revised Table 4 : The amount of North London’s waste managed in North London and elsewhere ~~Waste recorded as exported from North London to landfill 2011-2016~~
<table>
<tr><th>Waste stream</th><th>Waste arising</th><th>Amount managed in North London</th><th>Amount managed elsewhere in London</th><th>Amount exported to landfill outside London</th><th>Amount exported to other facilities outside London</th></tr>
<tr><td>LACW</td><td>845,776</td><td>718,900</td><td>1,000</td><td>68,900</td><td>56,900</td></tr>
<tr><td>C&I</td><td>762,301</td><td>402,900</td><td>34,600</td><td>251,600</td><td>73,000</td></tr>
<tr><td>C&D</td><td>443,180</td><td>248,000</td><td>108,225</td><td>30,200</td><td>31,000</td></tr>
<tr><td>Hazardous (HWDI)</td><td>53,420</td><td>313</td><td>12,663</td><td>8,557</td><td>31,887</td></tr>
<tr><td>Proportion</td><td></td><td>66%</td><td>7.5%</td><td>17%</td><td>9%</td></tr>
<tr><td>Excavation</td><td>747,242</td><td>52,523</td><td>335,862</td><td>265,415</td><td>82,463</td></tr>
<tr><td>Proportion</td><td></td><td>7%</td><td>45%</td><td>35.5%</td><td>11%</td></tr>
</table></td><td>None</td></tr>
</table>

Reference	Section	Further modification	Implications for the Habitats Regulations
MM15	5.29 [moved here after 5.8]	Some of this capacity will be provided by existing facilities which import waste from outside North London. In 2016, around 1 million tonnes of waste was imported in to North London. Most of the imported waste comes from immediate neighbours in Greater London, the South East and East of England and is managed in transfer stations, treatment facilities and metal recycling sites. ~~Some~~ The type of facilities in North London ~~have~~ with a wider-than-local catchment area ~~and manage waste from outside North London. This~~ include recycling and treatment facilities, in particular metal recycling and end of life vehicle (ELV) facilities as well as facilities for the processing of CDE in to recycled aggregate products for resale. Waste will continue to be imported into North London over the plan period in line with market demands. ~~The extra capacity contributes to achieving net self sufficiency, or managing the equivalent of the overall quantity of waste within the main categories for North London and London as a whole.~~	None
MM16	5.27	In 2016, ~~1,201.,964~~ 1.4 million tonnes of waste was recorded as exported from North London, ~~56%~~ 675,788 tonnes of which went to landfill. Most of the waste deposited to landfill was excavation waste (65%) followed by LACW/C&I (35%). Exports of LACW to landfill ~~in the LACW/C&I category~~ have been steadily declining in recent years~~, however an increase was shown in 2016. This is consistent~~ in line with the waste strategies of the London Mayor and the North London Waste Authority which aim to reduce the amount of waste going to landfill. ~~Therefore the increase in 2016 of exports to landfill in this category can probably be attributed to commercial and industrial waste, although the data does not identify why this has occurred.~~ Data for hazardous waste exports to landfill is shown from both the Waste Data Interrogator (WDI) and the Hazardous Waste Data Interrogator (HWDI). The HWDI is the more accurate of the two for hazardous waste, but the total exports to landfill figure is taken from the WDI only. Exports of CD&E waste generally follow patterns of waste arising, so when more CD&E waste is generated, more is exported. ~~This pattern is shown in Table 4 and Figure 10 below.~~	None
MM17	New [after 5.27]	Local planning authorities have a duty to cooperate with each other on strategic matters that cross administrative boundaries. Exports of waste from one waste planning authority to another is a strategic cross-boundary matter and is an important consideration in assessing the effectiveness of the NLWP. It is therefore important to understand the destination of North London's waste exports and to understand any issues which could prevent similar amounts of waste being exported in the future.	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		Although North London is planning for capacity to meet the equivalent of 100% of its waste arisings, North London has no landfill sites and is not planning to open any landfill sites. This means that waste arising in London which cannot be recycled or recovered and can only be disposed of to landfill will continue to do so. Table 6 identifies the amount of waste which is expected to be disposed of to landfill over the plan period and this will form part of the annual monitoring to ensure that duty to co-operate engagement takes place if there are significant changes from current and anticipated waste exports to landfill. It should be noted that exports from and imports into North London are not a measure of North London's net self-sufficiency. Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste need in North London, while recognising that some imports and exports will continue. For most waste streams, the market dictates where the waste is managed, however the more capacity there is within North London, the more opportunity for North London's waste to be managed within its own boundaries.	
MM18	5.32	~~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.~~ 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 works. 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 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.~~ [Moved from 5.31]	None

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for the Habitats Regulations</th></tr>
<tr><td></td><td></td><td>The destination of waste is largely dependent on market forces and therefore it is not possible to identify specific alternative destinations where North London's waste will go after the closure of landfill sites during the plan period. [Moved from 7.6]
The North London Boroughs have established that there is opportunity for the market to find alternative destinations in the wider south east for any of 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.</td><td></td></tr>
<tr><td>MM19</td><td>6.3 and Table 5</td><td>Targets for North London's waste management ~~managed within North London~~

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 taken from the draft new London Plan (December 2019) are as follows:

Table 5: Recycling and Recovery Targets with 2016 Baseline
<table>
<tr><th>Waste stream</th><th>Target</th><th>2016 baseline</th></tr>
<tr><td>LACW</td><td>50% recycling for LACW by 2025

(contributing to 65% recycling of municipal waste by 2030)</td><td>27~~9~~%</td></tr>
<tr><td>C&I</td><td>75% recycling by 2030

(contributing to 65% recycling of municipal waste by 2030)</td><td>44~~52~~%</td></tr>
</table></td><td>None</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for the Habitats Regulations</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>C&D</td><td>95% reuse/recycling/recovery ~~by 2020~~</td><td>93~~50-60~~%</td></tr>
<tr><td>Excavation</td><td>95% beneficial use</td><td>Not known</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>Hazardous</td><td>Included in LACW, C&I and C&D targets</td><td>N/A</td></tr>
</table>
</td><td></td></tr>
<tr><td>MM20</td><td>5.13</td><td>[Moved here]

The European Commission has put forward a Circular Economy Package’. This includes a 65% recycling target for municipal waste (LACW and C&I) by 2030. Notwithstanding the UK leaving the EU, the UK has signed up to delivering these targets as part of Brexit. The Circular Economy Package (CEP) recycling target of 65% municipal waste by 2030 has been superseded by the London Environment Strategy (LES) published in May 2018 in time to be incorporated into the NLWP. The LES aims to achieve 65% recycling from London’s municipal waste by 2030; this will be achieved through a 50% recycling rate from LACW by 2025 (LES Policy 7.2.1) and 75% from business waste by 2030 (LES policy 7.2.2). The LES therefore goes further than the CEP by bringing forward London’s LACW recycling target to 2025. The LES states that the Mayor expects waste authorities to collectively achieve a 50 per cent LACW recycling target by 2025 and aspire to achieve 45% household waste recycling by 2025 and 50% by 2030. Responsibility falls largely to London Boroughs in their capacity as waste collection and waste disposal authorities. The NLWA are expected to contribute to the Mayor’s targets and produce a waste strategy to show they are acting in conformity with the LES policies and proposals (see LES Box 36). ~~These revised targets have 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.~~</td><td>None</td></tr>
<tr><td>MM21</td><td>5.21</td><td>[Part of 5.21 moved here]</td><td>None</td></tr>
</table>

Reference	Section	Further modification	Implications for the Habitats Regulations
		The draft New London Plan (December 2019) includes a target of 95% reuse/recycling/recovery of C&D waste ~~CD&E by 2020~~ and 95% beneficial use of excavation waste. Beneficial use could include using excavated material within the development, or in habitat creation, flood defences or landfill restoration. Preference should be given to using the materials on-site or within local projects.	
MM22	6.4 (part)	Options for ~~managing~~ modelling North London's future waste arisings 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 ~~managing~~ modelling North London's waste arisings over the plan period. Analysis of and consultation on these options led ~~leading~~ to the selection of ~~the~~ a preferred strategy. These options seek to reflect the effects of future economic activity, including fiscal, financial and legislative factors such as landfill tax charges driving waste away from landfill, and financial incentives such as ROCs (Renewable Obligations Certificates) increasing the competitiveness of energy recovery. Employment growth is based on demographic projections of employment in the London Plan using North London Borough employment projections and is applied to the growth rates for the C&I and CD&E streams. For the LACW stream, the NLWA have provided the projections which have been used to inform the proposed application for a Development Consent Order to enable them to develop and operate an Energy Recovery Facility (ERF) at the Edmonton EcoPark from 2026. The scenarios considered are summarised in New Table, with the preferred scenarios highlighted. ~~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 (March 2016) 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 (March 2016), as such growth was modelled in line with the London Plan (March 2016).~~	None

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for the Habitats Regulations</th></tr>
<tr><td></td><td></td><td>[Moved down to after new Table 5]
[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 Appraisal has been carried through to the NLWP. The preferred option seeks to achieve growth in line with the London Plan (March 2016) and to deliver the targets set out in the Mayor's Environment Strategy.]</td><td></td></tr>
<tr><td>MM23</td><td>New Table after 6.4</td><td>New Table : Options considered for forecasting North London's waste arisings
<table>
<tr><th>LACW</th><th>C&I</th><th>C&D</th><th>Excavation</th><th>Hazardous</th><th>Agricultural</th></tr>
<tr><td colspan="6">Net self-sufficiency options</td></tr>
<tr><td>Meeting the London Plan apportionment</td><td>Meeting the London Plan apportionment</td><td>Baseline (no change)</td><td>Baseline (no change)</td><td>Baseline (no change)</td><td>Baseline (no change)</td></tr>
<tr><td>Net self-sufficiency</td><td>Net self-sufficiency</td><td>Net self-sufficiency</td><td>Managing as much as possible in North London</td><td>Net self-sufficiency</td><td></td></tr>
<tr><td>Self-sufficiency</td><td>Self-sufficiency</td><td>Self-sufficiency</td><td></td><td>Self-sufficiency</td><td></td></tr>
</table></td><td>None</td></tr>
</table>

			Growth Options						
				No growth (0% pa)	No growth (0% pa)	No growth (0% pa)	No growth (0% pa)	No growth (0% pa)	
				Minimised growth (0.40% pa)	Minimised growth (0.40% pa)	Minimised growth (0.40% pa)	Minimised growth (0.40% pa)		
			NLWA Waste Forecasting Model[1]	Growth (0.81% pa)	Growth (0.81% pa)	Growth (0.81% pa)	Growth (0.81% pa)		
			Management Options						
				Baseline (no change)	Baseline (no change)	Baseline (no change)	Baseline (no change)	Baseline (no change)	
				Median 80% recycling by 2035 16% Energy Recovery by 2035 4% to Landfill by 2035	Median 85% recycling 9% treatment 6% landfill				
			NLWA Forecasting	Maximised	Maximised	Maximised			

Reference	Section	Further modification							Implications for the Habitats Regulations
		model Central Scenario 44% recycling by 2035 (50% HH recycling by 2035) 55% Energy Recovery by 2035 1% landfill	85% Recycling by 2035 12% Energy Recovery by 2035 3% to Landfill by 2035	95% recycling / recovery / reuse 5% landfill	95% beneficial use 5% landfill				
MM24	6.4 (part) [Moved to after new Table 5]	Further details of these options is available in NLWP Data Study 2. An Options Appraisal Report (2019~~8~~) has also 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~~ net self-sufficiency options), and how this waste should be managed (management ~~strategy~~ options) for each of the options considered. Meeting North London's LACW, C&I and C&D waste arisings, including hazardous waste, was the preferred net self-sufficiency option because it is compliant with national legislation on managing all main							None

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for the Habitats Regulations</th></tr>
<tr><td></td><td></td><td>waste streams. In addition, it demonstrates to neighbouring authorities outside London that North London intends to manage as much of its own waste as possible and reduce exports. Growth of 0.81% was chosen as the preferred option because GLA evidence and projections anticipate substantial population and economic growth in London over the next few decades. Maximised Recycling was chosen as the preferred option for the management strategy because it aligns with national, regional and local recycling targets. This option also means that more waste will be managed further up the waste hierarchy with more opportunity to divert waste away from landfill. ~~The preferred option identified in the Options Appraisal has been carried through to the NLWP. The preferred option seeks to achieve growth in line with the London Plan (March 2016) and to deliver the targets set out in the Mayor's Environment Strategy.~~</td><td></td></tr>
<tr><td>MM25</td><td>New below 6.6</td><td>The results of the modelling of the preferred strategy for waste arisings over the plan period is set out in Table 8 below. The baseline data for these projections are the waste arisings figures set out in Table 2 of this plan. These figures represent two sets of projections. The first is how North London's waste is most likely to be managed over the plan period, aligned with the levels in the waste hierarchy (see STRATEGIC OBJECTIVE 1). While some of North London's waste will still be exported for management or disposal to landfill, the aim of the NLWP is to deliver the equivalent capacity for LACW, C&I, C&D and hazardous waste within its administrative borders. Therefore Table 8 also shows the total amount of waste arising in North London which the Boroughs need to provide capacity for (net self-sufficiency). This is in line with STRATEGIC OBJECTIVE 3 which is to plan for net self-sufficiency by providing opportunities to manage as much as practicable of North London's waste within the Plan area. Prevention and re-use also have a part to play, but in terms of waste management capacity in North London, recovery and recycling will play the most substantial part.</td><td>None</td></tr>
<tr><td>MM26</td><td>Table 8 [revised and moved here]</td><td>Table 8: Projected arisings and management of North London's waste 2020-2035<table><tr><th>Waste Stream</th><th>Facility Type</th><th>2020</th><th>2025</th><th>2030</th><th>2035</th></tr><tr><td>LACW</td><td>Recycling</td><td>418,169</td><td>424,049</td><td>430,280</td><td>436,824</td></tr></table></td><td>None</td></tr>
</table>

Reference	Section	Further modification						Implications for the Habitats Regulations
		LACW	Recovery (EfW), Treatment	566,872	572,856	579,725	587,352	
		LACW	Landfill	2,000	2,000	2,000	2,000	
		Total LACW capacity required for net self-sufficiency		**987,041**	**998,905**	**1,012,005**	**1,026,176**	
		C&I	Recycling	525,853	566,563	609,743	634,983	
		C&I	Recovery (EfW), Treatment	152,448	142,523	131,513	136,957	
		C&I	Landfill	109,139	110,951	112,726	117,392	
		Total C&I capacity required for net self-sufficiency		**787,440**	**820,037**	**853,982**	**889,332**	
		C&D	Recycling	435,054	453,063	471,816	491,347	
		C&D	Landfill	22,742	23,683	24,664	25,685	
		Total C&D capacity required for net self-sufficiency		**457,796**	**476,746**	**496,480**	**517,032**	
		Hazardous	Recycling	16,838	16,838	16,838	16,838	
		Hazardous	Recovery, Treatment	23,846	23,846	23,846	23,846	
		Hazardous	Landfill	12,737	12,737	12,737	12,737	

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for the Habitats Regulations</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td colspan="2">Total Hazardous capacity required for net self-sufficiency</td><td>53,421</td><td>53,421</td><td>53,421</td><td>53,421</td></tr>
<tr><td>Excavation</td><td>Beneficial use, Recycling, Treatment</td><td>733,294</td><td>763,647</td><td>795,257</td><td>828,176</td></tr>
<tr><td>Excavation</td><td>Landfill</td><td>38,594</td><td>40,192</td><td>41,856</td><td>43,588</td></tr>
<tr><td colspan="2">Total Excavation Waste</td><td>771,888</td><td>803,839</td><td>837,113</td><td>871,764</td></tr>
<tr><td>Agricultural</td><td>Recycling</td><td>89</td><td>89</td><td>89</td><td>89</td></tr>
<tr><td>Agricultural</td><td>Recovery, Treatment</td><td>9,130</td><td>9,130</td><td>9,130</td><td>9,130</td></tr>
<tr><td>Agricultural</td><td>Landfill</td><td>4</td><td>4</td><td>4</td><td>4</td></tr>
<tr><td colspan="2">Total Agricultural Waste</td><td>9,223</td><td>9,223</td><td>9,223</td><td>9,223</td></tr>
</table>
</td><td></td></tr>
<tr><td>MM27</td><td>5.5 [Moved here after Table 8]</td><td>Existing capacity

Table 3 below summarises ~~shows~~ the existing (2016~~8~~) capacity of North London's waste management facilities ~~in North London~~ by type of facility and waste stream managed ~~and changes in available capacity at known dates when facilities come on stream/close~~. It identifies an existing waste management capacity of ~~around 4.4~~ just over a million tonnes per annum of recycling/composting for the LACW and C&I waste streams, just under 600,000 tonnes per annum of energy recovery for LACW, around 630,000 tonnes per annum of recycling and treatment for CD&E waste, and about 4,250 tonnes of hazardous waste capacity. ~~reducing to around 3.8 million tonnes by 203529 as a result of known closure of some existing sites up to 2028~~ . Figure 9 shows the location of the facilities represented in Table 3 and a full list is in Appendix 1.</td><td>None</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for the Habitats Regulations</th></tr>
<tr><td>MM28</td><td>Table 3 [Revised and moved here after 5.5]</td><td>Table 3: ~~Maximum~~ Existing Annual Capacity at Licensed Operational Waste Management Facilities at the Start of the Plan Period ~~and a key dates following changes in sites capacities~~
<table>
<tr><th colspan="2">Type of capacity</th><th>Waste stream</th><th>Existing capacity (2016)</th></tr>
<tr><td rowspan="4">Management</td><td rowspan="3">Recycling / Composting / Treatment</td><td>LACW / C&I</td><td>1,062,424</td></tr>
<tr><td>CD&E</td><td>633,436</td></tr>
<tr><td>Hazardous</td><td>4,252</td></tr>
<tr><td>Energy Recovery</td><td>LACW / C&I</td><td>597,134</td></tr>
<tr><td rowspan="2"></td><td>Transfer</td><td>All</td><td>1,225,068</td></tr>
<tr><td>Landfill</td><td>All</td><td>0</td></tr>
</table></td><td>None</td></tr>
<tr><td>MM29</td><td>5.6 [Moved here]</td><td>The London Plan defines the technologies and processes which constitute ‘managing’ waste and these have been applied to North London’s facilities when calculating capacity. Only facilities which recycle and compost waste or recover energy from waste count towards waste ‘management’ in North London. Transfer Stations are therefore excluded from this total, although many facilities categorised as ‘transfer stations’ do some recycling and where recycling takes place at transfer stations this has been noted in the site profiles and added to the total in Table 3. ~~When considering the overall amount of waste generated identified in Table 2 against the current capacity of waste management facilities in North London identified in Table 3, there appears to be more than enough waste management capacity. However, this does not take into account the specialism of each type of facility or importantly, since North London is a net exporter of waste in terms of tonnage, imports to and exports from the area.~~</td><td>None</td></tr>
<tr><td>MM30</td><td>New paragraph after repositioned 5.6</td><td>Changes to Capacity over the Plan Period

Waste management capacity in North London will change over the plan period with some facilities moving or closing down and new facilities being built. This section sets out what we currently know about such changes.</td><td>None</td></tr>
</table>

Reference	Section	Further modification	Implications for the Habitats Regulations
MM31	8.5 Moved here	**Edmonton EcoPark** A Development Consent Order (DCO) has been approved by the Secretary of State for a ~~the~~ new Energy Recovery Facility (ERF) which will manage the treatment of the residual element of LACW during the NLWP plan period and beyond. The existing Edmonton EfW provides just under 600,000 tonnes of waste management capacity per annum and the new facility will provide around 700,000 tonnes per annum. This is an additional 100,000 tonnes which has been built into the calculation for the capacity gap. ~~The replacement facility, expected to be operational from 2025, will generate power for around 127,000 homes and provide heat for local homes and businesses as part of a decentralised energy network known as the Lee Valley Heat Network, trading as energetik.'~~	None – strengthens the air pollution impact assessment by confirming / clarifying that Edmonton EcoPark has already been subject to stringent assessment
MM32	8.6 Moved here	The NLWA's DCO allows for the loss of the composting plant at the Edmonton EcoPark site in 2020 to make way for the new ERF facility to be built whilst maintaining the current EfW operation and the NLWA are not intending to build a replacement facility. This will result in a capacity loss of around 35,200 tonnes per annum. This has also been built into the calculation of the capacity gap. ~~The development also includes a Resource Recovery Facility (RRF) including a new Reuse and Recycling Centre (RRC), a relocated transfer hall and a bulky waste/fuel preparation facility on the site.~~	None

Reference	Section	Further modification	Implications for the Habitats Regulations
MM33	8.10 Moved here	**Powerday** Powerday in Enfield is an existing site currently operating as a Waste Transfer Station. Planning permission was granted for an upgrade to a Materials Recovery Facility (MRF) capable of handling 300,000 tonnes of C&I and C&D waste per annum and the new facility was opened in 2015. However, this increase in capacity has not yet happened and it is not clear if the planning permission will be implemented. Therefore this has not been added to the pipeline capacity, however throughput for the site will be monitored and if additional capacity comes online it will be used to close the capacity gap.	None
MM34	8.11 Moved here	**Loss and re-provision of existing waste management facilities** 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 waste sites in North London will be redeveloped for other uses as part of the Brent Cross Cricklewood Regeneration scheme. ~~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 into the Plan process and~~ This information has been ~~given~~ highlighted in Schedule 1.	None
MM35	8.12 Moved here	The ~~North London Boroughs are aware that the regeneration of~~ Brent Cross Cricklewood Regeneration Area ~~redevelopment~~ (BXC) ~~is likely to affect~~ includes four existing waste sites, comprising a NLWA transfer station and three commercial operations. These are BAR3 PB Donoghue, BAR4 Hendon Transfer Station, BAR6 McGovern, and BAR7 Cripps Skips. 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; planning permission for this new site at Geron Way was granted by Barnet Council in September 2018. The existing commercial facilities at BAR 6 and BAR 7 fall within the land required to deliver the early ~~first~~ Southern phase of the BXC regeneration which is expected to ~~anticipated will~~ commence in the near term ~~early 2018~~.	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		~~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.~~ 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. For the purposes of the plan, therefore, it is assumed there will be no loss of capacity for these facilities.	
MM36	New para after repositioned 8.12	Two facilities in Waltham Forest (GBN Services and Pulse Environmental) have closed and their capacity has been replaced in a new facility operated by GBN services in Enfield. While the capacity has moved to a different Borough, there is no loss of capacity for North London as a whole. The new GBN facility is newly built but has been designed with sufficient capacity to replace that lost at the two Waltham Forest facilities and therefore, for the purposes of the plan the capacity of these facilities is assumed to remain the same. The new facility may also be able to provide capacity on top of what has been replaced, and this will be monitored.	None
MM37	6.7	**Meeting the Capacity Gap** The capacity gap is the difference between projected waste arisings (Table 8) and existing capacity (Table 3). Table 6 below sets out the capacity gap broken down in to 5 year periods over the NLWP plan period. It takes account of the known changes to capacity over the plan period, including the upgrading and loss of existing facilities. ~~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).~~ North London can accommodate recycling, composting, treatment and recovery facilities to manage waste and so additional waste management capacity will be in the 'recycling' and 'recovery' tiers of the waste hierarchy. ~~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~~	None

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for the Habitats Regulations</th></tr>
<tr><td></td><td></td><td>~~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.~~</td><td></td></tr>
<tr><td>MM38</td><td>Table 6</td><td>[Revised]

Table 6: Capacity gaps throughout the Plan period (tonnes) ~~– chosen option~~

<table>
<tr><td>LACW/C&I</td><td>2020</td><td>2025</td><td>2030</td><td>2035</td></tr>
<tr><td>Projections</td><td>1,774,481</td><td>1,818,942</td><td>1,865,987</td><td>1,915,508</td></tr>
<tr><td>Existing capacity – recycling/ composting</td><td>1,062,424</td><td>1,062,424</td><td>1,062,424</td><td>1,062,424</td></tr>
<tr><td>Existing and pipeline capacity - recovery</td><td>597,134</td><td>700,000</td><td>700,000</td><td>700,000</td></tr>
<tr><td>Loss of capacity - composting</td><td>-</td><td>35,200</td><td>35,200</td><td>35,200</td></tr>
<tr><td>Capacity Gap</td><td>-114,923</td><td>-91,718</td><td>-138,763</td><td>-188,284</td></tr>
</table>

<table>
<tr><td>C&D</td><td>2020</td><td>2025</td><td>2030</td><td>2035</td></tr>
<tr><td>Projections</td><td>457,796</td><td>476,746</td><td>496,480</td><td>517,032</td></tr>
<tr><td>Existing capacity</td><td>633,436</td><td>633,436</td><td>633,436</td><td>633,436</td></tr>
<tr><td>Additional pipeline capacity</td><td>0</td><td>0</td><td>0</td><td>0</td></tr>
<tr><td>Surplus capacity</td><td>+175,640</td><td>+156,690</td><td>+136,956</td><td>+116,404</td></tr>
</table>

<table>
<tr><td>Hazardous</td><td>2020</td><td>2025</td><td>2030</td><td>2035</td></tr>
<tr><td>Projections</td><td>53,421</td><td>53,421</td><td>53,421</td><td>53,421</td></tr>
<tr><td>Existing and pipeline capacity</td><td>4,252</td><td>4,252</td><td>4,252</td><td>4,252</td></tr>
<tr><td>Capacity Gap</td><td>-49,169</td><td>-49,169</td><td>-49,169</td><td>-49,169</td></tr>
</table>
</td><td>None</td></tr>
<tr><td>MM39</td><td>New</td><td>[New para after Revised Table 6, now Table 8]</td><td>None</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for the Habitats Regulations</th></tr>
<tr><td></td><td></td><td>To meet the capacity gaps identified in Table 6, the North London Boroughs will seek opportunities for new capacity through intensification of existing sites and/or new facilities. The North London Boroughs contacted existing waste operators to find out if there are any current plans to upgrade or intensify their facilities (see chapter 8 and Policy 1).</td><td></td></tr>
<tr><td>MM40</td><td>6.8</td><td>~~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~~ In order to estimate how much land is required for plan-making purposes, the capacity gap has been converted into a land area requirement based on a typical throughput per hectare for each type of facility. The amount of land required depends on the type of facility and the technology being used. New technologies may come forward during the plan period which have a higher throughput per hectare and so will require less land. The North London Boroughs want to ensure the best use of land in the area and this means maximising the capacity of a site while mitigating any environmental impacts. The land required is indicative only and new capacity will be monitored rather than land. Reference capacities are set out in ~~the table~~ Table New below. Table 20 in section 7 of the Data Study Part 2 (2019~~8~~) ~~available on the website (www.nlwp.net)~~ provides a fuller explanation. 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. In order for net self-sufficiency to be achieved by 2026, in line with the London Plan, new capacity will need to be delivered by this date.</td><td>None</td></tr>
<tr><td>MM41</td><td>New Table</td><td>New Table: Reference Capacities for Land Take for New Waste Facilities<table><tr><th>Facility type</th><th>Assumed tonnes per hectare</th></tr><tr><td>Energy from waste (large scale)</td><td>165,000</td></tr><tr><td>Energy from waste (small scale)</td><td>50,000</td></tr><tr><td>Recycling (C+I & LACW)</td><td>128,000</td></tr><tr><td>Recycling (C+D)</td><td>100,000</td></tr><tr><td>Recycling (specialised – eg. metals)</td><td>50,000</td></tr></table></td><td>None</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for the Habitats Regulations</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>Recycling (Hazardous)</td><td>10,000</td></tr>
<tr><td>Re-use</td><td>15,000</td></tr>
<tr><td>Composting</td><td>25,000</td></tr>
<tr><td>Treatment plant</td><td>50,000</td></tr>
<tr><td>Treatment Plant (Hazardous)</td><td>10,000</td></tr>
</table>
</td><td></td></tr>
<tr><td>MM42</td><td>Table 7</td><td>[Table 7 revised]

Table 7: Indicative land take requirements for meeting the capacity gap ~~net self-sufficiency for LACW, C&I and C&D (requirements for London Plant apportionment in brackets)~~

<table>
<tr><th>Waste Stream</th><th>Management type</th><th>Hectares
2026</th></tr>
<tr><td>C&I/LACW</td><td>Recycling</td><td>1.5</td></tr>
<tr><td>Hazardous</td><td>Recycling/recovery/treatment</td><td>4.9</td></tr>
<tr><td>TOTAL land required in North London</td><td></td><td>6.4</td></tr>
</table>
</td><td>None</td></tr>
<tr><td>MM43</td><td>6.10</td><td>A capacity gap equivalent to ~~two~~ around 4.9 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</td><td>None</td></tr>
</table>

Reference	Section	Further modification	Implications for the Habitats Regulations
		nature. The Boroughs will therefore work with the GLA and other boroughs across London to identify and meet a regional need.	
MM44	New paragraphs after 8.1	At the core of waste planning is the requirement for waste planning authorities to "prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams" (NPPW 3). In particular, waste planning authorities should "identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations" (NPPW 4). The London Plan (Policy SI8) requires Development Plans to plan for identified need and "allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste". The London Plan also identifies existing waste sites, Strategic Industrial Land (SIL) and Locally Significant Industrial Sites as a focus for new waste capacity. STRATEGIC OBJECTIVE 2 seeks to ensure there is sufficient suitable land available to meet North London's waste management needs and reduce the movements of waste through safeguarding existing sites and identifying locations for new waste facilities. Known opportunities to intensify and upgrade existing facilities have already been taken into account in section 6 and have been incorporated into the calculations for meeting the capacity gap. Where further opportunities to optimise waste management capacity on existing sites arise, this is supported by Policy 1 where the proposal is in line with relevant aims and policies in the North London Waste Plan, the London Plan, Local Plans and related guidance. North London's identified waste need and capacity gap is set out in section 6 and summarised in Table 6 above. Additional facilities to meet the capacity gap would require approximately 6.4ha of land, depending on the type of technology used.	None

Reference	Section	Further modification	Implications for the Habitats Regulations
MM45	8.2 [Restructured]	The ~~NLWP identifies a number of~~ North London Boroughs assessed a range of sites and areas to meet future waste needs. Assessment criteria have been developed using waste planning policy and in consultation with key stakeholders in a series of focus groups. This work is set out in the Sites and Areas Report. ~~It was initially intended to also identify sites within the NLWP, i.e.~~ A 'site' in this context is an individual plot~~s~~ of land that ~~would be~~ is safeguarded for waste use only. ~~However, only one site was brought forward by landowners 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.~~ 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 New London Plan (December ~~July~~ 2019) 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.	None
MM46	8.20	Waste facilities are considered to be industrial uses and are therefore considered suitable, in principle, to be developed on any industrial land in North London. This is in line with policies in the NPPW and London Plan which direct new waste facilities towards industrial land. However, in preparing the NLWP, the North London Boroughs have sought to take this approach a stage further and identify the most suitable land in North London for a range of new waste facilities: "Priority Areas". The proposed site and area search criteria used in the NLWP site selection process were developed based on the requirements of national waste planning policy. Both planning and spatial criteria were discussed with key stakeholders through a focus group session in spring 2014 . Following the introduction of the NPPW in October 2014, the site and area search criteria were reviewed to ensure compliance with this document.	None - clarification
MM47	8.21	An extensive site and area search and selection process has been undertaken. Full details of the site selection exercise are set out in the 'Sites and Areas Report' and the 'Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP' Report available on the NLWP website. In summary it has involved the following key stages: […]	None - clarification

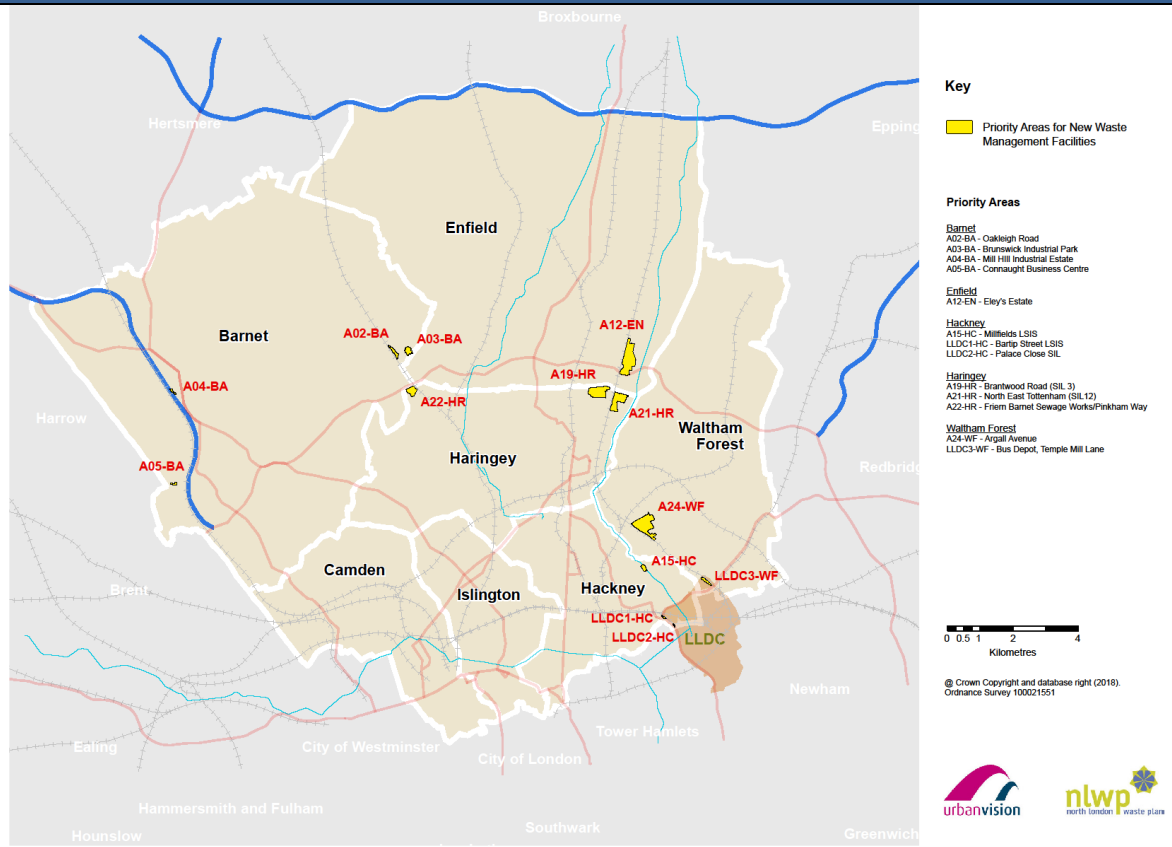
Reference	Section	Further modification	Implications for the Habitats Regulations
		x. Following consultation responses on the Draft Plan, a Sites and Areas Options Appraisal was prepared to analyse a number of different approaches for reducing the total quantum of land identified for new waste facilities and creating a better geographical spread of waste facilities in line with Spatial Principle B. This resulted in the reduction of total land identified for new waste facilities from 351.8ha in the Draft Plan to 102.38ha in the Proposed Submission Plan.	
MM48	8.24	~~In preparing this (Proposed Submission) version of the NLWP, and deciding which sites and areas to take forward, the North London Boroughs took into account national and regional policy, the aims of the NLWP and consultation responses on the Draft Plan, including issues raised around deliverability and other constraints. Further work was undertaken to gather and assess additional information on the proposed sites and areas received during the consultation or as a result of new data being published.~~ In order to respond to issues raised during consultation on the suitability of the Draft Plan proposed sites and areas, the North London Boroughs undertook four areas of further work in order to identify which sites and areas should be taken forward: • Gather and assess additional information on sites/areas • Changes to policy wording on reducing the impact of new waste development • Seek a better geographical spread of waste facilities • Consider options to reduce the amount of land taken forward in the Proposed Submission Plan	None - clarification
MM49	New paragraphs after 8.24	The additional information gathered and assessed included transport evaluations, potential mitigation measures, updating flood risk information and other environmental factors, consideration of where waste facilities might be best located within an Area, heritage and National Grid assets, and identifying Areas within an Opportunity Area, Housing Zone, Crossrail 2 or Lee Valley Regional Park. This information helped inform amendments to Policy 6, and Area Profiles were updated accordingly with a further assessment of the suitability of the proposed sites and areas undertaken.	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		In response to comments about the distribution of waste facilities across North London, Spatial Principle B was amended from 'Seek a network of waste sites across North London' to 'Seek a better geographical spread of waste sites across North London, consistent with the principles of sustainable development'. This change provided the basis for further work on the distribution of Areas taken forward in the Proposed Submission Plan.	
MM50	8.25 [restructured and split]	~~The North London Boroughs developed a range of reasonable options for taking forward sites and areas in the Proposed Submission version of the plan. Further~~ In considering geographical spread of facilities and reducing the sites and areas to be taken forward in the Proposed Submission Plan, each Borough's current contribution to waste management capacity In North London was calculated. Currently 62% of the total land in existing waste use across North London is located in Enfield. In order to address concerns that there is an over-concentration of waste facilities in Enfield, promote a better geographic spread of waste facilities in North London, and reduce the amount of land taken forward into the Proposed Submission Plan, the Boroughs considered five alternatives with different land options. The details of these options are brought together ~~set out~~ in 'Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP' (Updated 2020)~~(2018~~. The options included and excluded areas based on their performance against qualitative assessment criteria, such as Local Plan designations and performance against suitability rating (banding) as detailed in the Sites and Areas Report. Analysis of each of the five options considered, amongst other issues, the proportion of Enfield's contribution to the Areas identified. One of the options limited the number of Areas for new waste facilities in Enfield to one. The option with the lowest land provided (102ha) combined with the best geographical spread (limiting the land identified in Enfield) has been taken forward into this Plan. In looking to reduce the total amount of land identified as most suitable for new waste uses, the Boroughs did not identify any criterion which would provide a sound basis to reduce the number of areas further than a combined total of 102ha. The other options did not significantly reduce the amount of land identified and/or did not provide a better geographical spread of Areas. The preferred option was to take forward land designated as industrial land and high-performing (Band B) ~~sites/~~areas, while achieving a better geographical spread by reducing the ~~number of sites~~ amount of land for new	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		waste facilities identified in Enfield. This focus on industrial land and the highest performing areas helps to locate waste facilities away from residential properties, as far as this is possible in an urban area like North London.	
MM51	New after 8.25	Following the work described above, all of the individual sites and several of the Areas were removed from Schedules 2 and 3 and in some of the remaining Areas the amount of land considered most suitable for new waste facilities was refined. The NLWP therefore takes an area-based approach to waste planning with no individual sites allocated for new waste facilities. An area-based approach is one which identifies areas which comprise 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 uses. The identification of Areas allows for flexibility in bringing forward a range of locations across North London, allowing for a better geographic spread of opportunities for future waste development that is consistent with the spatial principles of the plan to meet North London's requirement. However, because the Areas identified are not safeguarded solely for waste use it is important to identify sufficient land to ensure adequate opportunity across North London for waste operators to provide new facilities because there will competition for this land by other industrial users. It should be noted that most waste planning authorities are in the same position and that this approach is supported by both the NPPW and the London Plan. An update to the Data Study to support the Proposed Submission NLWP reduced the indicative land required to meet the capacity gap from 12ha in the Draft NLWP to 9ha in the Proposed Submission NLWP. This has since reduced further to 6.4ha in light of the Data Study Addendum (2020). For the Plan to provide confidence that sufficient land is available in the right place and at the right time a quantum of land and number of Areas has to be identified. As identified in the Sites and Areas Report, it is not possible to say precisely how much of North London's industrial land could become available for waste uses over the plan period. This depends on the rate at which existing land becomes vacant in the identified Areas and a waste operator being ready and able to locate on that same site. This in turn depends on the wider economic factors. Identifying a range of land suitable for new waste facilities	None – clarifies the area-based approach

Reference	Section	Further modification	Implications for the Habitats Regulations
		responds to the NPPW expectation that waste planning authorities "should identify sufficient opportunities to meet the identified needs of their area". This also provides flexibility for waste operators and should sites not become available in one particular Area, or if an Area changes over the plan period to become unsuitable for waste uses, this approach will ensure there are alternative land options available. The work set out in the 'Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP' resulted in reducing the total amount of land identified as most suitable for new waste facilities from 351.8 in the Draft Plan to 102.38ha in the Proposed Submission Plan. While 102ha is a large area when compared to the need for 6.4ha, this land is currently occupied by existing industrial uses. There is strong competition for industrial land in North London and this is reflected by low vacancy rates (an average of 4.8%). The Boroughs will rely on business churn for release of individual sites which could come forward for waste uses. The most recent analysis of business churn in London suggests that around 20% of land could be released in this way. Analysis of business churn and vacancy rates is included in the Sites and Areas Report. To provide 6.4ha, 6% of the Priority Areas would need to be developed for waste management to meet the capacity gap, if no additional capacity is provided on existing sites. It should be noted that 6.4ha of land is indicative only and throughput on a site will depend on the operational technology used. New capacity to meet North London's needs will be monitored rather than land take. The preferred approach limits the areas proposed for new waste facilities in Enfield to one industrial area and although this option is considered the most appropriate to take forward in the NLWP, there is a risk that the identified Area in Enfield (comprising 26ha) could accommodate all new waste capacity, which would not respect Spatial Principle B or generally encourage a sustainable distribution. There is also a possibility that applications could come forward for new waste facilities on other industrial land in Enfield. To address this, the 'Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP' recommends a 'Priority Areas' sequential approach to ensure developers consider siting a facility within the Areas listed in Schedules 2 and 3 before other locations. In addition, developers should seek sites in Priority Areas outside Enfield before	

Reference	Section	Further modification	Implications for the Habitats Regulations
		considering sites in Enfield. This recommendation has been taken forward in Policy 2: Priority Areas for New Waste Management Facilities and Policy 3: Windfall Sites.	
MM52	8.26	The Priority Areas ~~areas~~, shown in Figure 13 (see also Schedules 2 and 3 in section 9), have been identified as the most suitable for built waste management facilities. The Priority Areas ~~areas~~ are being put forward as they comply with the NLWP Spatial Principles ~~Framework~~ which is reflected in the site and area selection criteria, as well as a range of environmental, social and economic criteria set out in the Sustainability Appraisal Scoping Report. In the absence of the identification of individual sites, the Priority Areas represent sufficient opportunities to deliver the identified waste management needs of North London over the plan period. ~~During the course of the plan, it is expected that land will become available as part of the business churn~~. In order to ensure that Priority Areas are the focus for new waste capacity, the location of new waste facilities and any compensatory capacity will be monitored through Monitoring Indicator IN3. The aim of the indicator is to check that sites in Priority Areas are being taken up as anticipated and also monitor if land within Schedules 1, 2 and 3 is not available or suitable for new waste facilities. The later aspect in particular will enable the Boroughs and developers to understand where sufficient land remains available and the geographic distribution of new waste facilities, which will inform potential site searches and evidence required by the Boroughs for those seeking planning consent for sites for waste uses. The monitoring will help to demonstrate the progress of the spatial principle for better geographical spread and achievement of the sequential approach to delivery of new waste sites set out in Policies 2 and 3. Any proposals for waste facilities within the Priority Areas ~~areas~~ will be subject to planning permission. ~~No provision is made for landfill due to the inability of the Plan area to accommodate development of landfill.~~	None – clarification of the area-based approach
MM53	Figure 13	Priority Areas for new waste management facilities ~~of proposed new areas~~	None – areas have been Assessed

Reference	Section	Further modification	Implications for the Habitats Regulations
			
MM54	7.2	Most of North London's waste capacity need is met through its existing facilities. These existing facilities are safeguarded through London Plan policy, however they are not always in the most sustainable locations. The	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		NLWP seeks to make the most of the existing infrastructure by supporting intensification of existing sites, where appropriate, while enabling relocation to more sustainable locations for replacement capacity (see Policy 1). Existing capacity and additional new capacity will be needed to meet North London's identified need for waste management over the plan period (2020-2035). The Boroughs are seeking a sustainable network of waste facilities which helps reduce movements of waste, including waste exports and increase opportunities for waste to be managed in proximity to its source. Existing waste capacity in North London is ~~safeguarded and~~ set out in Schedule 1 (see Policy 1 and Appendix 1) and ~~land~~ Priority Areas for new waste facilities is set out in Schedules 2 and 3 (see Policy 3). The Priority Areas for new waste capacity represent the most suitable land when assessed against the Spatial Principles, including a better geographical spread, and the assessment criteria detailed in the previous chapter. This helps to deliver STRATEGIC OBJECTIVE 2 which seeks to ensure there is sufficient suitable land available to meet North London's waste management needs. The focus for new waste capacity in North London is for recycling and recovery facilities to manage the quantities of waste set out in Table 8, thereby reducing exports. New waste facilities will be assessed against the criteria in Policy 5.	
MM55	7.4	The North London Boroughs will monitor the NLWP against the projected quantities of waste generated set out in Table 8, (IN1), new waste management capacity delivered (IN2), the locations of new waste facilities and compensatory capacity (IN3) and the amount of waste exported (IN7) to ensure the ~~strategic~~ over-arching policy is being delivered. All monitoring indicators are set out in Section 10 of this plan.	None
MM56	7.8	Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste streams comprise similar types of waste. Most facilities which manage these waste streams do not differentiate between them and so it is reasonable to group them together when assessing existing capacity and planning for additional capacity. ~~The NLWP identifies sufficient land to manage the equivalent of all LACW and C&I waste arising in North London by 2026.~~	None
MM57	New after 7.8	There is a capacity gap of up to around 174,500 tonnes for LACW and C&I waste over the plan period. This equates to approximately 1.5 hectares of land, depending on the technology of the facility/ies. This calculation includes the increase in EfW capacity and the loss of composting capacity at Edmonton EcoPark.	None

Reference	Section	Further modification	Implications for the Habitats Regulations
MM58	7.9	The North London Waste Authority (NLWA) and seven constituent boroughs are ~~is~~ seeking to achieve a household waste recycling target of 50% by 2020 consistent with the targets set out in the North London Joint Waste Strategy. The Authority and partner boroughs will continue to seek to maximise recycling levels for LACW. The North London Joint Waste Strategy, and this target, may be revised to bring it in line with the targets in the Mayor's Environment Strategy of 50% LACW recycling by 2025, 50% household waste recycling by 2030 and 65% municipal waste recycling by 2030.	None
MM59	7.10	There is a need for additional capacity for recycling for ~~both~~ the LACW/~~and~~ C&I waste streams~~s~~ throughout the plan period. ~~A~~LACW and C&I are combined for the purposes of waste planning as many facilities ~~can~~ manage both waste streams~~, the need for recycling is combined~~.	None
MM60	New after 7.11	There is an opportunity to bring forward new LACW waste recycling/composting capacity on the Friern Barnet Pinkham Way site which is owned by the North London Waste Authority, although presently there are no plans to do so. There are also opportunities to bring forward commercial recycling capacity in all but one of the Priority Areas identified in Schedules 2 and 3, and composting capacity on four of the Priority Areas. Additional capacity and recycling rates will be monitored by Monitoring Indicator IN1 and reported in the Annual Monitoring Report.	None
MM61	New after 7.14	There are opportunities for additional recovery capacity to be brought forward on three of the proposed Priority Areas.	None
MM62	New after 7.15	Many waste transfer facilities also recycle some of the waste they receive. There is opportunity for waste transfer facilities to come forward on nine of the Priority Areas.	None
MM63	7.19	*Recycling* ~~The NLWP will identify sufficient land to manage the equivalent of all~~ North London has sufficient capacity to manage Construction and Demolition (C&D) waste arising in North London over the plan period. ~~by 2035, while acknowledging that s~~Some exports of excavation waste will continue, but opportunities to manage as much of this waste stream as practicable within North London will be sought. ~~particularly for Excavation waste. At least 95% of excavation waste exports will be put to beneficial use~~	None
MM64	7.20	The majority of C&D waste is recycled on site or through transfer facilities. Each Borough Local Plan has a sustainable design and construction policy in place which seeks to minimise waste generated during the design	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		and construction of development and re-use or recycling of materials on-site where possible. Recycling rates will be monitored by Monitoring Indicator IN1 and reported in the Annual Monitoring Report.	
MM65	7.23	*Landfill* 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.~~	None
MM66	7.26	*Recycling and Recovery* North London has a number of facilities which manage ~~one~~ hazardous waste ~~treatment facility~~ alongside other non- hazardous waste. The majority of these are ~~include~~ vehicle depollution (car breakers) and metal recycling sites ~~WEEE sites~~. There are also transfer facilities ~~as well as~~ such as RRCs which will accept some hazardous waste, for example, paints and batteries which require specialist treatment and disposal. Such sites will continue to make a valuable contribution to managing North London's hazardous waste requirements. The amount of hazardous waste managed in North London varies from year to year with a maximum capacity of around 4,250 ~~3,600~~ tonnes over the last five years. ~~per annum and two recycling facilities; one for metals and one for end of life vehicles handling around 2,500 tonnes per annum between them. In addition, other facilities permitted to manage hazardous waste~~	None
MM67	7.27	There is a capacity gap for the ~~recovery~~ management of around 49,000 ~~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 4.9~~2~~ha of land. The North London Boroughs support the provision of such facilities in principle in the Priority Areas ~~appropriate locations~~ and will work with the GLA and other Boroughs across London to meet this need. It is noted in the sites and area profiles in Appendix 2 of the NLWP where a ~~site or area~~ Priority Area is not suitable for hazardous waste recycling and recovery facilities. Any applications for hazardous waste facilities in	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		North London that do come forward will be considered on a case by case basis. However, in the short term it is likely that hazardous waste will continue to be exported to the most appropriate specialist facilities.	
MM68	Policy 1	Policy 1: Existing waste management sites All existing waste management sites identified in *Schedule 1: Existing safeguarded waste sites in North London*, and any other sites that are given planning permission for waste use, are safeguarded for waste use. Expansion or intensification of operations at existing waste sites will be ~~supported~~ permitted where the proposal is in line with relevant aims and policies in the North London Waste Plan, the London Plan, Local Plans and related guidance. Applications for non-waste uses on safeguarded waste sites will only be permitted where it is clearly demonstrated by the developer to the satisfaction of the relevant borough that compensatory capacity will be delivered in line with the Spatial Principles ~~Framework~~ on a suitable replacement site in North London that must at least meet, and, if possible, exceed, the maximum achievable throughput of the site proposed to be lost and help to promote the increased geographical spread of waste sites across the plan area. [*no underline*] Development proposals ~~in close proximity to existing safeguarded waste sites or sites allocated for waste use~~ which would prevent or prejudice the use of ~~those~~ existing waste sites for waste purposes will be resisted under the agent of change principle unless design standards or other suitable mitigation measures are adopted to ensure that the amenity of any new residents would not be significantly adversely impacted by the continuation of waste use at that location or suitable compensatory provision has been made for the waste use elsewhere within the Plan area. **This policy helps meet strategic objectives SO2 and SO3**	None – existing sites already managed, regulated and controlled as waste facilities

Reference	Section	Further modification	Implications for the Habitats Regulations
		This policy contributes towards Spatial Principles ~~Framework components~~ A and C	
MM69	9.4	The purpose of Policy 1 is to ensure that the existing waste capacity in North London is protected and is able to expand where appropriate. It applies to sites with existing operational waste facilities, and any other sites developed for waste use throughout the plan period. The safeguarding of waste sites for waste use does not preclude waste operators from moving and selling their site as a waste site.	None – existing sites already managed, regulated and controlled as waste facilities
MM70	9.6	Some existing waste sites may have the potential to increase their capacity, or provide additional waste services; p~~P~~lanning applications for ~~expansion of existing waste facilities~~ such changes will be ~~supported~~ permitted where they are in alignment with policies in this Plan and with Borough Local Plans.	None – existing sites already managed, regulated and controlled as waste facilities
MM71	9.7	If, for any reason, an existing waste site is to be lost to non-waste use, compensatory waste capacity ~~provision~~ will be required ~~within North London~~. Compensatory capacity must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost. When assessing the throughput of a site, the maximum throughput achieved over the last five years should be used. ~~Replacement provision will be calculated using the maximum achievable throughput (tonnes per annum)~~	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		~~that the site has achieved as set out in the EA Waste Data Interrogator.~~ ~~Maximum throughput for existing sites 2009-2016 can be found in the Data Study Part 3: Sites Schedule Report Tables 1-7: Assessment of existing waste management capacity.~~ This information is sourced from the Environment Agency's Waste Data Interrogator. It is the responsibility of the developer to demonstrate that replacement capacity has been provided. Where this information is not available, for example if a waste site has been vacant for a number of years, the potential capacity of the site should be calculated using an appropriate and evidenced throughput per hectare. Applicants will need to demonstrate that provision of replacement capacity is secured before permission is granted for an alternative use. This could be through a compensatory site of a suitable size to meet at least the maximum annual throughput or an increase of capacity in an existing facility. Boroughs may consider using conditions or s106 agreements to satisfy themselves that compensatory capacity will be delivered. ~~However, i~~It may not be necessary for replacement sites to be on a 'like for like' basis, for example, a new site with a larger capacity might replace a number of sites with individually smaller, but combined equivalent, capacity.	
MM72	9.8 [divided in two]	Compensatory provision should be delivered in accordance with the Spatial Principles ~~Framework~~ and such proposals will need to demonstrate compliance with Policy 2 (Priority Areas for new waste management facilities), Policy 3 (Windfall sites) and Policy 5 (Assessment Criteria for waste management facilities and related development) of the NLWP. ~~The area of search for a replacement site~~ Compensatory capacity should be provided within North London unless the NLWP Monitoring Report demonstrates that waste capacity in North London is sufficient to meet net self-sufficiency for LACW, C&I and C&D waste, including hazardous waste (Table 6). If sufficient capacity has been achieved in North London, compensatory capacity should be provided elsewhere in London. If it can be demonstrated that there is sufficient capacity in London to meet London's apportionment and net self-sufficiency targets, it may be possible to justify the release of waste sites for other uses. During the Plan period, where waste sites shown in Schedule 1 are lost, but compensatory provision has been made and can be identified, this will be noted in the NLWP AMR (see IN2 in section 10). Sites which are going to be redeveloped for other uses during the plan period are identified in Schedule 1 and should be excluded from the search criteria for potential sites for new or replacement waste facilities.	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		[Begin new para] As set out within Section 4, a key Spatial Principle of the NLWP is to establish a geographical spread of waste sites across North London, consistent with the principles of sustainable development. The aim is to ensure that waste is managed efficiently and as close to its source as possible whilst minimising any negative cumulative impacts resulting from a high concentration of waste facilities. Avoiding an unduly high concentration of waste facilities in a location is consistent with the overarching objectives of sustainable development, identified within the NPPF and would leave land available for other uses. Policy 2 identifies the Priority Areas for new waste management facilities and a sequential approach to site selection. The most suitable location for the re-provision of a site lost to non-waste development may therefore not necessarily be within the same north London borough as the displaced site. Adequate evidence of compensatory provision will be required to the satisfaction of the local planning authority before planning permission for redevelopment proposing loss of a facility is granted.	
MM73	9.9	Any sites that come forward and receive planning permission for waste development which are implemented in the lifetime of the NLWP will be regarded as existing waste sites in North London and safeguarded under the provisions of this Policy (1). As part of the monitoring of the plan, waste arisings (IN1) the tonnage of waste capacity available by management type and type of wastes handled (IN2) and the loss of existing waste capacity and provision of replacement capacity (IN4), will be monitored (see section 10). The most up-to-date list of existing waste management sites will be found in the NLWP AMR. Where existing waste sites are lost, but compensatory provision has been made to the satisfaction of the Borough, this will be noted in the AMR. In time the safeguarded designation will be removed from the relevant Borough's policies map.	None
MM74	9.10	[…] The NPPF and the draft new London Plan (December 2019) sets out the 'Agent of Change' principle. This principle places the responsibility of mitigating the ~~noise~~ impact of noise, dust, vibration and other nuisance-generating activities (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	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		developments should be designed to protect both the amenity of potential new residential developments and the existing waste operation within that area.	
MM75	New after 9.10	Some existing waste sites may be having an adverse impact on surrounding uses such as schools and residential areas. Both the Boroughs and the Environment Agency have a role in ensuring that conditions of the environmental permit and planning permission are not breached. The North London Boroughs will monitor any enforcement action taken against waste operators (IN6) to ensure that existing waste facilities do not cause harm to the environment or local communities.	None – confirms that existing sites already managed, regulated and controlled as waste facilities
MM76	Policy 2	**Policy 2: Priority Areas for new waste management facilities** Areas listed in *Schedule 2: ~~Areas suitable~~ Priority Areas for waste management* and *Schedule 3: ~~Areas~~ Priority Areas identified in LLDC Local Plan* are identified as suitable for built waste management facilities to meet the identified need set out in Tables 6 and 8. To help meet the spatial principle to create a better geographical spread of waste facilities in North London, developers should first seek sites in Priority Areas outside Enfield, and must demonstrate that no sites are available or suitable before considering sites within Enfield's Priority Area.	None – Areas have already been Assessed and no LSE will occur, providing mitigation measures are

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for the Habitats Regulations</th></tr>
<tr><td></td><td></td><td>Applications for waste management development will be permitted on suitable land within the ~~areas~~ Priority Areas identified in Schedule 2 subject to other policies in the North London Waste Plan, the London Plan and Local Plans, and related guidance.

Development proposals will need to manage waste as far up the waste hierarchy as practicable.

Applications for waste management development within the ~~areas~~ Priority Areas identified in Schedule 3 will be assessed by the London Legacy Development Corporation.

This policy helps meet strategic objectives SO1, SO2, SO3 and SO5

This policy contributes towards Spatial Principles ~~Framework components~~ B, C and E ~~F~~</td><td>implemented</td></tr>
<tr><td>MM77</td><td>Schedules 2 and 3</td><td>Table 1: Schedule 2 ~~Areas suitable~~ Priority Areas for waste management
<table>
<tr><th rowspan="2">Area ref</th><th rowspan="2">Area Name</th><th rowspan="2">Size ~~Area~~ (ha)</th><th rowspan="2">Borough</th><th colspan="5">Waste Facility Type</th></tr>
<tr><th>A</th><th>B</th><th>C</th><th>D</th><th>E</th></tr>
<tr><td>A02-BA</td><td>Oakleigh Road</td><td>0.99</td><td>Barnet</td><td>X</td><td></td><td>X</td><td></td><td>X</td></tr>
<tr><td>A03-BA</td><td>Brunswick Industrial Park</td><td>3.9</td><td>Barnet</td><td>X</td><td></td><td></td><td></td><td>X</td></tr>
<tr><td>A04-BA</td><td>Mill Hill Industrial Estate</td><td>0.9</td><td>Barnet</td><td>X</td><td></td><td></td><td></td><td>X</td></tr>
<tr><td>A05-BA</td><td>Connaught Business Centre</td><td>0.9</td><td>Barnet</td><td>X</td><td></td><td></td><td></td><td>X</td></tr>
</table></td><td>None</td></tr>
</table>

Reference	Section	Further modification	Implications for the Habitats Regulations

A12-EN	Eley's Estate	26.1	Enfield	X	X	X	X	X
A15-HC	Millfields LSIS	1.48	Hackney			~~X~~		X
A19-HR	Brantwood Road	16.9	Haringey	X			X	X
A21-HR	North East Tottenham	15.32	Haringey	X			X	X
A22-HR	Friern Barnet Sewage Works/ Pinkham Way	5.95	Haringey	X	X			X
A24-WF	Argall Avenue	26.91	Waltham Forest	X	X			X

Table 2: Schedule 3 ~~Areas~~ Priority Areas identified in LLDC Local Plan

Area ref	Area Name	Size ~~Area~~ (ha)	Borough	Waste Facility Type				
				A	B	C	D	E
LLDC1-HC	Bartrip Street	0.6	Hackney	X				X
LLDC2-HC	Chapman Road (Palace Close)	0.33	Hackney	X				X
LLDC3-WF	Temple Mill Lane	2.1	Waltham Forest	X	X			X

Reference	Section	Further modification	Implications for the Habitats Regulations
MM78	9.11 [rearranged]	National and European requirements state that waste plans must identify locations where future waste development may take place. In addition, the London Plan requires boroughs to allocate sufficient land to provide capacity to manage apportioned waste. Policy 2 identifies ~~areas~~ Priority Areas for new waste facilities and their suitability for a range of built waste management facilities. These Priority Areas have been assessed against national, regional and local criteria, including the Strategic Objectives and Spatial Principles, and represent the most suitable areas for new waste facilities in North London. To help redress the high proportion of North London's waste facilities already in Enfield (62%), and help deliver a better geographical spread of sites (Spatial Principle B), developers are required to demonstrate that no land is available or suitable in Priority Areas outside of Enfield before considering the Priority Area identified within the Borough. The exception to this is for Recycling and Reuse Centres (RRCs) where there is an identified need in Enfield and Barnet to improve the coverage across North London (see Policy 4). The evidence will need to demonstrate an adequate search has been undertaken which takes into account the type of waste facility proposed, the criteria set out in Table 10 and the criteria set out in policy 6.	None - clarification
MM79	9.13	In Schedules 2 and 3, the NLWP identifies thirteen ~~several~~ ~~areas~~ Priority Areas to provide land suitable for the development of waste management facilities, including RRCs (see Policy 4). Each ~~'area'~~ Priority 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~~ Priority 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 Principle C ~~Framework~~). Areas listed in Schedule 2: ~~Areas~~ Priority Areas listed in *Schedule 2: ~~Areas suitable~~ Priority Areas for waste management* and *Schedule 3: ~~Areas~~ Priority Areas identified in LLDC Local Plan* 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.	None
MM80	9.14	The ~~areas~~ Priority Areas are considered to be in the most suitable, sustainable and deliverable locations in North London for new waste management facilities when assessed against a range of environmental, economic and	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		social factors (see STRATEGIC OBJECTIVE 5) and the Spatial Principles ~~Framework~~. The location of new waste facilities and compensatory capacity will be monitored through Monitoring Indicator IN3.	
MM81	9.15	~~The site~~ Area profiles in Appendix 2 are provided to assist developers who wish to build a waste facility in North London. The Profiles indicate the size of each ~~area~~ Priority Areas, the type of facility likely to be accommodated on the area, constraints, and any mitigation measures which may be required. Developers should be aware that any type of facility listed as potentially suitable is subject to consideration against the full suite of relevant local planning policies/guidance.	None
MM82	9.16	The ability of ~~areas~~ Priority Areas to accommodate a range of types and sizes of waste management facility is important to the flexibility of the Waste Plan. Table 13: Key to Waste Management Facility Types contains a full list of the types of facilities which were considered when assessing ~~sites~~ Areas and which may be required over the plan period to meet the identified capacity gap and to provide new sites for compensatory capacity. The facility types identified are broad categories which may come forward over the plan period. The order of facility types reflects their place in the waste hierarchy, with categories A and B at the 'recycling' level and C-E at the 'other recovery' level. Applicants should take account of this order when responding to the second criteria of Policy 2 which requires development proposals to manage waste as far up the waste hierarchy as practicable in line with STRATEGIC OBJECTIVE 1.	None – range of possible impacts already Assessed
MM83	Policy 3	**Policy 3: Windfall Sites** Applications for waste development on windfall sites outside of the existing sites and ~~areas~~ Priority Areas for new waste management facilities identified in Schedules 1,2 and 3 will be permitted provided that the proposal can demonstrate that: a) the sites and ~~areas~~ Priority Areas identified in Schedules 1, 2 and 3 are not available or suitable for the proposed use or the proposed site would be better suited to meeting the identified need having regard to the Spatial Principles; New) sites have first been sought outside Enfield before sites within Enfield were considered, and that no sites outside Enfield are available or suitable, in line with Spatial Principle B;	None – windfall sites will be separately Assessed if/when they come forward

Reference	Section	Further modification	Implications for the Habitats Regulations
		b) the proposed site meets the criteria for built facilities used in the site selection process (see Table 10 of Section 8 of the NLWP) the proposal fits within the NLWP Spatial Principles ~~Framework~~, and contributes to the delivery of the NLWP aim and objectives; […] **This policy contributes towards Spatial ~~Framework~~ Principles ~~components~~ B and C**	
MM84	9.23	Developers of windfall sites are required to demonstrate why it is not possible to use, expand or intensify an existing waste site set out in Schedule 1 or why ~~the~~ sites ~~and~~ in the ~~areas~~ Priority Areas in Schedules ~~1,~~ 2 and 3 are not available or suitable. In addition, to help address concerns that there is a high proportion of North London's waste facilities already in Enfield, and help deliver a better geographical spread of sites (Spatial Principle B), developers are required to demonstrate that no sites are available or suitable outside of Enfield before considering those within the Borough. The exception to this is for Recycling and Reuse Centres (RRCs) where there is an identified need in Enfield and Barnet to improve the coverage across North London (see Policy 4). The evidence will need to demonstrate an adequate search has been undertaken which takes into account the type of waste facility proposed, the criteria set out in Table 10 and the criteria set out in policy 6. [split paragraph] Developers proposing waste sites outside the Priority Areas will be expected to demonstrate ~~or~~ that the proposed site would be better suited to meeting the identified need for North London having regard to delivering the Spatial Principles of the NLWP. For example a windfall site may deliver a better geographic spread of facilities in North London (Spatial Principle B), or there may be an opportunity to co-locate a recycling facility with a reprocessing plant (Spatial Principle C) or an opportunity for small scale expansion of an existing site onto adjacent land which helps facilitate the maximum use of an existing waste site and enable co-location of facilities. There may be instances in the future where advances in waste technologies are such that existing sites or Priority Areas ~~the identified sites/areas~~ do not meet the technical requirements of a proposed waste management facility, for example, the identified locations might be too small for the proposed development or the facility may need to be	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		located near a specific waste producer or user of heat. Some of the ~~areas~~ Priority Areas identified in Policy 2 may become unavailable over the Plan period because they will be used for other purposes or affected by future development proposals such as Crossrail 2 and Opportunity Areas. Locating certain types of waste processing sites within large scale redevelopment areas may also have benefits for reducing need for waste transport especially during the construction phase for the management of CDE. In addition, it is also recognised that proposals on windfall site may come forward to provide capacity for displaced facilities from within the plan area where existing capacity needs to be re-provided locally and this need cannot be met through the existing allocations.	
MM85	9.24	Proposals for waste development on windfall sites will be supported where the proposal would not compromise existing planning designations and where the impacts on communities and environment can be satisfactorily controlled. ~~This~~ In proposing a windfall site, developers will need demonstrate that the spatial principles set out in chapter 4 have been considered, and in particular ~~should not work against~~ that the proposed site can deliver the spatial principle of balanced geographical distribution of waste facilities across North London, taking into account the concentration of existing waste sites in Enfield with reference to the NLWP Annual Monitoring Report ~~as set out in the Spatial Framework~~.	None
MM86	Policy 4	**Policy 4 – Re-use & Recycling Centres** Proposals for Re-use & Recycling Centres will be permitted where: a) They improve the coverage of centres across the North London Boroughs, in particular ~~are sited~~ in an area of identified need for new facilities in Barnet or Enfield ~~or elsewhere where they improve the coverage of centres across the North London Boroughs~~, and; b) They are in line with relevant aims and policies in the North London Waste Plan, London Plan, Local Plans and other related guidance. **This policy helps meet strategic objectives SO1, SO2 and SO3**	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		This policy contributes towards Spatial ~~Framework~~ Principles ~~components~~ A and B	
MM87	9.33	Re-use & Recycling Centres should be located where they can provide appropriate access for members of the public and for contractors and their vehicles. They are best sited on former waste sites or in areas of industrial or employment land and need to be of a sufficient size for the range and quantity of materials likely to be received. Sites within areas identified in Schedules 1, 2 and 3 ~~Areas suitable for waste management~~ are likely to be the most suitable locations, and Policy 3: Windfall Sites will apply to any application for a RRC outside of these areas. There may be scope to provide localised recycling centres as part of major new development.	None
MM88	Policy 5	**Policy 5: Assessment Criteria for waste management facilities and related development** Applications for waste management facilities and related development, including those replacing or expanding existing sites, will be required to demonstrate to the satisfaction of the relevant Borough that: New after a) the proposal maximises the waste management capacity of the site c) the facility will be enclosed unless justification can be provided by the developer ~~as to why that is not necessary~~ that an equivalent level of protection can be permanently achieved by other means. f) there is no significant adverse impact on ~~the historic environment (heritage assets and their settings, and undesignated remains within Archaeological Priority Areas),~~ open spaces or land in recreational use or landscape character of the area including the Lee Valley Regional Park; New after f) heritage assets and their settings are conserved and where appropriate enhanced;	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		i) the development avoids increasing the levels of vulnerability to climate change, makes appropriate adaptation and mitigation measures to achieve this, and helps reduce greenhouse gas emissions ~~makes the fullest possible contribution to climate change adaptation and mitigation~~ ~~m) appropriate permits are held or have been applied for from the Environment Agency~~ **This policy helps meet strategic objectives SO4, SO5, SO7 and SO8** **This policy contributes towards Spatial ~~Framework~~ Principles ~~component~~ C, E and F**	
MM89	9.34	Policy 5 seeks to ensure that the construction and operation of waste facilities does not give rise to an unacceptable impact on health, or harm the **amenity** of local residents or the environment. Amenity is defined as any element providing positive attributes to the local area and its residents and impacts can include such issues as, but not limited to, increased levels of local air pollution, increased noise disturbance, light impacts including increased light or reduced light or sunlight, reduced privacy, loss of outlook and reduced visual amenity. Applicants will need to demonstrate that appropriate measures and/or Best Available Techniques (BAT) (where applicable) have been taken to minimise any potential impacts from the proposed waste development to ensure the protection of local amenity and health. The specific requirements will vary from site to site, however issues to be addressed may include strict hours of operation, effective cladding on buildings to prevent noise pollution, and dust and odour suppression systems as appropriate. These issues are discussed in more detail below. Policy 5 helps deliver a number of the STRATEGIC OBJECTIVES, including SO4 which seeks high standards of design, SO5 which seeks to integrate social, environmental and economic considerations, SO6 which seeks a low carbon economy, SO7 which supports the use of sustainable forms of transport, and SO8 which seeks to protect the natural environment, biodiversity, cultural and historic environment.	None – provides for effective protection of European Sites
MM90	New para after 9.34	London Plan policy SI8 promotes capacity increases at waste sites and where appropriate to maximise their use. In order to demonstrate that North London's land is being used to its highest potential, developers are required to	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		provide evidence that the waste management capacity on a site has been optimised. This could be in reference to similar facilities operating to a high standard.	
MM91	9.37	The supporting documents should set out how landscape proposals can be incorporated as an integral part of the overall development of the site and how the development contributes to the quality of the wider urban environment. The applicant will need to demonstrate that there will be no significant adverse effect on areas or features of landscape~~, historic~~ or nature conservation value. Where relevant, applications for waste management facilities and related development will be required to demonstrate that they conserve and where appropriate enhance heritage assets and their settings, including consideration of non-designated archaeology where relevant ~~the delivery of waste facilities (through construction to operation) should take account of the need to conserve and enhance the historic environment~~ in line with the NPPF.	None
MM92	9.40	Waste and recyclables require transportation at various stages of their collection and management and so opportunities to employ more sustainable options such as rail and river should be fully considered. STRATEGIC OBJECTIVE 7 supports the use of sustainable forms of transport and minimise the impacts of waste movements including on climate change. North London is characterised by heavy traffic on all principal roads. That is why developers need to prioritise non-road forms of transport if at all possible and to set out their assessment of sustainable transport options in a Transport Assessment detailing transport issues to be submitted with any planning applications for waste facilities (see below). In North London there exists considerable potential for sustainable transport of waste as part of the waste management process. There are a number of railway lines and navigable waterways in North London including the Regents Canal and the Lee Navigation. It is existing practice to transport waste by train and pilot projects have taken place to transport waste by water. Developers are required to demonstrate that they have considered the potential to use water and rail to transport waste before reliance on transport of waste by road. Where the site lies adjacent to a wharf or waterway, capable of transporting waste, developers need to demonstrate that consideration has been given to the provision and/or enhancement of wharf facilities. This will be monitored through Monitoring Indicator IN5 (see Chapter 10). Waste transfer activities that do take advantage of rail and or boat transportation must also ensure that they design their site and meet the standards required by all waste management sites stated in this Plan.	None

Reference	Section	Further modification	Implications for the Habitats Regulations
MM93	9.41	Applicants will need to submit a **Transport Assessment** in line with the relevant borough Local Plan policy and the London Plan. The Transport for London Best Practice Guide contains advice on preparing Transport Assessments when they are required to be submitted with planning applications for major developments in London. Consideration should be given to access arrangements, safety and health hazards for other road users, the capacity of local and strategic road networks, impacts on existing highway conditions in terms of traffic congestion and parking, on-site vehicle manoeuvring, parking and loading/unloading areas, and queuing of vehicles. The Assessment ~~statement~~ should include a traffic management plan establishing the times of access for vehicles to minimise disruption on the local road network during peak hours, and setting out specific routes to ensure that vehicles are accessing the site via roads considered suitable by the Highways Authority and, where possible, avoid overlooking of the site access by residential properties. The Assessment should cover the types of vehicles to be used, including opportunities to use low emission vehicles, alternatives to vehicles powered by the internal combustion engine, and the provision of any infrastructure at future or expanded waste sites to accommodate this. The statement should also cover emission standards and fuel types in line with national and regional air quality standards.	None
MM94	9.42	The development of Servicing and Delivery Plans and Construction Logistic Plans (CLP) will be encouraged for all waste developments. Such Plans ensure that developments provide for safe, efficient and legal delivery and collection, construction and servicing including minimising the risk of collision with vulnerable road users such as cyclists and pedestrians. Consideration should be given to the use of Direct Vision Lorries for all waste vehicles and the use of freight operators who can demonstrate their commitment to TfL's Freight Operator Recognition Scheme (FORS) or similar. Developers need to demonstrate that they can operate servicing and deliveries in the most efficient way that makes best use of transport movements that are made.	None
MM95	9.44	~~Waste developments should be~~ Criteria 5j seeks ~~designed~~ to protect and enhance local **biodiversity**. Development proposals will be assessed against this policy as well as other relevant principles and policies set out in the NPPF and Borough Local Plans. […]	None
MM96	9.48	The North London Strategic Flood Risk Assessment (SFRA) and individual borough 'Level 2' SFRAs have demonstrated the current risks from **flooding** from various sources across North London and site specific flooding	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		assessments have been undertaken on Priority Areas ~~new sites/areas~~ in schedules 2and 3. Where a site is near or adjacent to areas of flood risk, the development is expected to contribute through design to a reduction in flood risk in line with the NPPG. Development proposals will be required to assess the impact of climate change using the latest published climate change allowances, and mitigate to the appropriate future flooding scenario using these allowances. . A sequential approach to the layout of the site should be taken aiming to locate development in the parts of the site at lowest risk of flooding. Waste facilities are often characterised by large areas of hardstanding for vehicles and large roof areas. Development proposals will be required to show that flood risk would not be increased as part of the scheme and, where possible, will be reduced overall through the use of Sustainable Drainage Systems (SuDS) and other techniques. Any proposed development should be reviewed by the Environment Agency at an early stage to discuss the reduction of flood risk on the site.	
MM97	Policy 6	**Policy 6: Energy Recovery and Decentralised Energy** Where waste cannot be managed at a higher level in the waste hierarchy ~~and recovery of energy from waste is feasible,~~ waste development~~s~~ are required to ~~should~~ generate energy, ~~and/or~~ recover excess heat ~~(including the recovery of energy from gas)~~ and provide a supply to networks including decentralised energy networks unless it is not technically feasible or economically viable to do so. Developers must demonstrate how they meet these requirements as part of a submitted Energy Statement Where there is no available decentralised energy network and no network is planned within range of the development, as a minimum requirement the proposal should recover energy through electricity production and be designed to enable it to deliver heat and/or energy and connect to a Decentralised Energy Network in the future. ~~Developers must demonstrate how they meet these requirements, or provide evidence if it is not technically feasible or economically viable to achieve them, as part of a submitted Energy Statement.~~	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		This policy helps meet strategic objectives SO1 and SO6 **This policy contributes towards Spatial ~~Framework~~ Principles ~~component~~ D**	
MM98	9.61	Work is already underway to progress the delivery of a decentralised network in the Lee Valley known as Meridian Water ~~the Lee Valley Heat Network (LVHN)~~. ~~The LVHN~~ Meridian Water 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. Meridian Water ~~The LVHN~~ 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. Any future development, 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.	None
MM99	Policy 7	Proposals for the provision of new facilities for the management, treatment and disposal of wastewater and sewage sludge will be permitted, provided that: • it is demonstrated that there is an identified need for such a facility within the North London Waste Plan Area, which cannot be met through existing waste facilities; and • the proposals meet the other policies of this North London Waste Plan together with all other relevant policies of the appropriate borough's Development Plan~~, and meet environmental standards set by the Environment Agency.~~ **This policy helps meet strategic objectives SO1, SO2 and SO5** **This policy contributes towards Spatial ~~Framework~~ Principles ~~component~~ A and B**	None
MM100	Policy 8	**Policy 8: ~~Control of~~ Inert Waste**	None

Reference	Section	Further modification	Implications for the Habitats Regulations
		Inert waste should be managed as far up the waste hierarchy as possible, including on-site recycling and reuse of such material. Proposals for development using inert waste will be permitted where the proposal is for beneficial use, including but not limited to: ~~both essential for, and involves the minimum quantity of waste necessary for:~~ a) ~~The purposes of~~ ~~r~~ Restoring former mineral working sites; or b) Facilitating an improvement in the quality of land; or c) Facilitating the establishment of an appropriate use in line with other policies in the Local Plan; or d) Improving land damaged or degraded as a result of existing uses and where no other satisfactory means exist to secure the necessary improvement. ~~Where one or more of the above criteria (a-d) are met, a~~ All proposals using inert waste should: a) Incorporate finished levels that are compatible with the surrounding landscape. The finished levels should be the minimum required to ensure satisfactory restoration of the land for an agreed after-use; and b) Include proposals for high quality restoration and aftercare of the site, taking account of the opportunities for enhancing the overall quality of the environment and the wider benefits that the site may offer, including biodiversity enhancement, geological conservation and increased public accessibility. Proposals for inert waste disposal to land will not be permitted if it can be demonstrated that the waste can be managed through recovery operations ~~and that there is a need to dispose of waste~~. **This policy helps meet strategic objectives SO1, SO2 and SO3**	

Reference	Section	Further modification	Implications for the Habitats Regulations
		This policy contributes towards Spatial ~~Framework~~ Principle ~~component~~ B	
MM101	9.68	Inert waste materials can be an important resource and should be used for beneficial purposes, such as the restoration of mineral sites and in engineering works, or at other 'exempt sites' rather than disposed of at inert landfill sites. A definition of 'beneficial uses' can be found in the new London Plan. Increased use of recycled and secondary aggregates can reduce the need and demand for primary aggregates extraction. Sites and operators will need to conform to the 'Aggregates from inert waste Quality Protocol' document to achieve 'end of waste' status. If this cannot be achieved and/or the operator cannot prove compliance with the protocol, then the material will not have achieved 'end of waste' status and will still be considered a waste and subject to controlled waste legislation. There is no 'end of waste' criteria for soil so this will always be viewed as a waste once it has become a controlled waste outside of the Definition of Waste Code of Practice.	None
MM102	10.3	Responsibility for monitoring lies with the individual boroughs. However the boroughs have agreed to monitor the Plan jointly through a lead borough arrangement. Data will be collated ~~by each borough~~ and included in a joint NLWP ~~their Authority~~ Monitoring Report~~, which is produced annually~~ which will be produced annually.	None

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for the Habitats Regulations</th></tr>
<tr><td>MM103</td><td>10.6 Table 14</td><td>
<table>
<tr><th></th><th>Indicator</th><th>Target(s)</th><th>What it monitors</th><th>Outcome(s) sought</th></tr>
<tr><td>IN1</td><td>Waste arisings (Table 6) by waste stream and management route

~~5. Total quantity of waste arisings managed by waste stream (LACW, C&I and CD&E) and management route (recycling/composting, recovery and disposal)~~</td><td>Waste arisings and management in line with forecasts in Table 6 (Baseline Table 3)

~~In line with Table 8 in Section 7 and the Data Study~~

~~To ensure that inert waste is managed in line with the waste hierarchy~~</td><td>Strategic Aim (capacity supply and self-sufficiency)
Strategic Aim (move waste up Waste Hierarchy)
SO1 (resource efficiency)
SO3 (net self-sufficiency)
Meeting Future Requirements as specified in the NLWP</td><td>To check that the NLWP is planning for the right amount of waste

~~Waste Policy and London Plan targets~~

~~Ensure the NLWP delivers a net self-sufficient waste management outcome for the principal waste streams~~</td></tr>
</table>
</td><td>None</td></tr>
</table>

Reference	Section	Further modification					Implications for the Habitats Regulations
			~~11. Number of developments permitted which include disposal of inert waste to land~~		% waste diverted and % landfilled	~~To ensure that proposals involving the importation and disposal of inert waste to land are achieving in line with waste hierarchy.~~	
		IN2	Waste management capacity (Table 8) by waste stream and management route, including existing capacity, new capacity, loss of capacity,	Capacity to meet net self-sufficiency targets in Tables 6 and 8 Zero loss of capacity	Strategic Aim (capacity supply and self-sufficiency) Strategic Aim (move waste up Waste Hierarchy) SO1 (resource efficiency)	To check that capacity is increasing to meet net self-sufficiency targets ~~Ensure sufficient capacity of the right~~	

Reference	Section	Further modification					Implications for the Habitats Regulations
			compensatory capacity and capacity gaps ~~3. Tonnage of waste capacity, including new waste capacity available by management type (recycling/composting, recovery and disposal) and type of wastes handled (LACW, C&I and CD&E)~~ ~~4. Loss of existing waste capacity and~~	Replacement ~~locally,~~ within ~~the Borough,~~ North London ~~or~~ London Replacement capacity for Brent Cross Cricklewood provided within Barnet ~~Capacity sufficient to manage capacity requirements as set out in Table 6 Capacity Gaps. New waste facilities in~~	SO3 (net self-sufficiency) Meeting Future Requirements as specified in the NLWP Policy 2: Area allocations Policy 3: Unallocated sites Policy 4. Reuse and Recycling Centres Policy 7 Waste Water Treatment Works and Sewage Plant	~~type is available throughout the plan period~~ Ensure that capacity is replaced locally unless net self-sufficiency has been met ~~valid planning reasons are provided for not doing so.~~	

Reference	Section	Further modification					Implications for the Habitats Regulations
			~~provision of replacement capacity~~	~~line with Table 7: land take requirements~~	Policy 8 Control of Inert Waste		
		IN3	Location of new waste facilities and compensatory capacity ~~1. Amount of Land within identified areas or on windfall sites brought forward for waste use during the plan period.~~	Land within Schedules 1, 2, 3 ~~In line with Table 7: landtake requirements~~	SO2 (capacity provision) Policy 1: Existing waste management sites Policy 2: Area allocations Policy 3: Unallocated sites	To check that identified sites and areas are being taken up as anticipated. To monitor if land within Schedules 1, 2 and 3 is not available or suitable	

Reference	Section	Further modification					Implications for the Habitats Regulations
						for new waste facilities.	
		IN4	~~2.~~ Sites in Schedule 1 and Areas in Schedules 2 and 3 lost to other non-industrial uses through a major regeneration scheme or designated for non-industrial uses in a review of the London Plan or Local Plan	Less than 25% of land lost If 50% of land is lost this will trigger review of plan	SO2 (capacity provision) Policy 2: Area allocations	To check that identified land is sufficient to deliver the plan's aims To ensure sufficient existing capacity remains for managing the levels of waste expected across North London over the plan period as set out in Table 8.	

Reference	Section	Further modification					Implications for the Habitats Regulations
		IN5	The number of sites consented that offer non-road transport options, the number of those sites where such options have been implemented and the total tonnage transported through non-road options (where known).	Facilities where non-road forms of transport are used to move waste and recycling	SO5 (sustainability) SO7 (sustainable transport) Spatial Principle F (sustainable transport)	Reduce impact on climate change Improve amenity	
		IN6	Enforcement action taken against waste sites by the local authority and/or Environment Agency on breach of planning	Zero ~~100%~~	SO5 (sustainability) SO8 (protect the environment) Spatial Principles ~~framework~~ (Reduce impact on amenity)	To ensure sites do not cause harm to the environment or local communities	

Reference	Section	Further modification					Implications for the Habitats Regulations
			conditions or environmental permit ~~7. Number of approvals for new waste facilities which meet legislative requirements~~		Policy 5: Assessment Criteria for waste management facilities and related development	~~Avoid impact on sensitive receptors or maximise scope for effective mitigation~~	
		IN7	~~6.~~ Amount of waste imported and exported ~~to landfill~~ by waste stream and management route ~~(LACW, C&I and CD&E)~~	Exported waste to landfill in line with Table ~~6~~9 of the NLWP Reduction in waste exports	Net self-sufficiency Changes to imports and exports	Waste exports are in line with those estimated in the NLWP and through the duty to co-operate	

Reference	Section	Further modification					Implications for the Habitats Regulations
		IN8	~~8.~~ Number of new CHP facilities serving district heat networks in which the principal fuel source is residual waste or recovered waste fuel	Monitor only	Strategic Aim (green London)	Monitor only	
		IN9	~~9.~~ Sufficient infrastructure in place for management of waste water	Monitor only – information to be obtained from Thames Water	Strategic Aim (capacity supply and self-sufficiency) SO5 (sustainability)	To ensure that Thames Water have sufficient capacity to management the levels of waste water generated in North London over the plan period	

<table>
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<tr><td></td><td></td><td></td><td></td></tr>
<tr><td>MM104</td><td>Table 15</td><td>Table 15: Roles and responsibilities involved in implementing the Plan<table><tr><th>Organisation</th><th>Role</th><th>Responsibilities</th></tr><tr><td>Local planning authorities (including</td><td>Apply Plan policies</td><td>Assessing suitability of applications against Plan policies and priorities</td></tr></table></td><td>None</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for the Habitats Regulations</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>London Legacy Development Corporation)</td><td></td><td>Deliver the strategic objectives and policies of the NLWP alongside wider development and regeneration objectives</td></tr>
<tr><td></td><td>Regulate / monitor</td><td>Inspect operating waste sites periodically

<u>Appoint a lead borough to monitor the plan and carry out the duty to co-operate when required</u>

<u>Publish annual monitoring reports in the NLWP</u>

<s>Monitor Plan performance annually</s></td></tr>
<tr><td></td><td>Performance delivery</td><td>Support / promote waste reduction initiatives through the planning system</td></tr>
</table>
</td><td></td></tr>
<tr><td>MM105</td><td>Schedule 1</td><td><s>Table 3:</s> Schedule 1: Existing safeguarded waste sites in North London</td><td>None</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for the Habitats Regulations</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>Site ID</td><td>Site Name</td><td>Site Address</td><td>Waste Stream</td><td>Managed Waste</td><td>2012</td><td>2013</td><td>2014</td><td>2015</td><td>2016</td><td>~~Borough~~</td></tr>
<tr><td>BAR1</td><td>Winters Haulage, Oakleigh Road South</td><td>British Rail Sidings, Oakleigh Road South, Southgate, London,

N11 1HJ</td><td>C&I / CDE</td><td>X</td><td>10,495</td><td>38,503</td><td>40,409</td><td>35,379</td><td>0</td><td></td></tr>
<tr><td>BAR 2</td><td>Scratchwood Quarry</td><td>London Gateway Service Area, M1 Motorway, Mill Hill, London, NW7 3HU</td><td>CDE</td><td>✓</td><td>52,835</td><td>71,046</td><td>99,060</td><td>102,527</td><td>131,505</td><td>~~Barnet~~</td></tr>
</table>
</td><td></td></tr>
</table>

Reference	Section	Further modification										Implications for the Habitats Regulations
		BAR 3♦	P B Donoghue, Claremont Rd	3 Shannon Close, Claremont Rd, Cricklewood, London, NW2 1RR	CDE	✓ (96%)	0	118,964	112,449	112,487	111,226	~~Barnet~~	
		BAR 4♦	W R G, Hendon Rail Transfer Station	Hendon Rail Transfer Station, Brent Terrace, Hendon, London, NW2 1LN	LACW	X	153,952	164,129	114,457	128,605	142,107	~~Barnet~~	
		BAR 5	Summers Lane Reuse and Recycling Centre	Civic Amenity & Waste Recycling Centre, Summers	LACW	X	15,612	16,361	17,206	10,584	18,237	~~Barnet~~	

Reference	Section	Further modification											Implications for the Habitats Regulations
				Lane, London, N12 0RF									
		BAR 6♦	Mc Govern Brothers, Brent Terrace, Hendon	26-27 Brent Terrace, Claremont Industrial Estate, Hendon, London, NW2 1BG	C&I / CDE	X	78,488	76,609	78,855	106,206	102,373	~~Barnet~~	
		BAR 7♦	Cripps Skips Brent Terrace	Nightingale Works, Brent Terrace, Claremont Way Industrial Estate, London, NW2 1LR	C&I / CDE	X	9,726	7,719	8,807	9,408	8,910	~~Barnet~~	

Reference	Section	Further modification											Implications for the Habitats Regulations
		BAR 8	Apex Car Breakers, Mill Hill	Ellesmere Avenue, Mill Hill, London, NW7 3HB	C&I	✓	182	162	227	256	243	~~Barnet~~	
		BAR 9	Vacant (previously ~~Railway Arches, Hendon~~ Savacase Ltd)	Railway Arches, Colindeep Lane, Hendon, London, NW9 6HD	C&I	N/A	0	0	0	0	0	~~Barnet~~	
		BAR 10	G B N Services Ltd, New Southgate	Land/Premises at Oakleigh Road South, Friern Barnet,	CDE	✓ (72%)	14,596	29,938	29,456	31,274	10,746	~~Barnet~~	

Reference	Section	Further modification										Implications for the Habitats Regulations
				London, N11 1HJ								
		BAR 11	~~Upside Railway Yard~~ Mill Hill Depot	Upside Railway Yard, Brent Terrace, Cricklewood, London, NW2 1LN	CDE	X	0	0	0	0	234,930	~~Barnet~~
		CAM1	Regis Road Reuse and Recycling Centre	Regis Road, Kentish Town, London NW5 3EW	LACW	X	-	2,535	5,409	5,595	5,119	~~Camden~~
		ENF 1	Crews Hill Transfer Station	Kingswood Nursery, Theobalds Park Road, Crews Hill, Enfield,	C&I	X	17,466	17,124	19,231	19,507	18,427	~~Enfield~~

Reference	Section	Further modification											Implications for the Habitats Regulations
				Middlesex, EN2 9BH									
		ENF 2	Barrowell Green Recycling Centre	Barrowell Green, Winchmore Hill, London, N21 3AU	LACW	X	10,715	14,556	13,837	11,541	16,923	~~Enfield~~	
		ENF 3	Pressbay Motors Ltd, Motor Salvage Complex	Motor Salvage Complex, Mollison Avenue, Brimsdown, Enfield, Middlesex, EN3 7NJ	C&I	✓	63	63	26	29	37	~~Enfield~~	
		~~ENF 4~~	~~Chase Farm Hospital, The~~		C&I (clinical)	✓	1,615	1,705	2,396	2,276	-	~~Enfield~~	

Reference	Section	Further modification										Implications for the Habitats Regulations
			~~Ridgeway (SITA)~~									
		ENF 5	Jute Lane, Brimsdown	Greenwood House, Jute Lane, Brimsdown, Enfield, Middlesex, EN3 7PJ	LACW	✓ (76%)	16,115	11,732	12,659	10,125	15,410	~~Enfield~~
		ENF 6	AMI Waste (Tuglord Enterprises) ~~Stacey Avenue~~	17 Stacey Avenue, Edmonton, London, N18 3PP	C&I / CDE	X	16,855	27,043	28,566	23,004	21,974	~~Enfield~~
		ENF 7	Vacant (formerly Budds Skips) ~~, The Market~~	The Market Compound, 2 Harbet Road, Edmonton,	C&I / CDE	-	834	802	1,778	0	0	~~Enfield~~

Reference	Section	Further modification											Implications for the Habitats Regulations
			~~Compound, Harbert Road~~	London, N18 2HQ									
		ENF 8	Biffa Edmonton (AKA Greenstar Environmental) ~~, Adra Road, Edmonton~~	Atlas at Aztec 406, 12 Ardra Road, Off Meridan Way, Enfield, London, N9 0BD	LACW / C&I	✓ (84%)	231,771	72,530	271,888	276,855	270,106	~~Enfield~~	
		ENF 9	Hunt Skips, Commercial Road, Edmonton	Rear of 160 Bridport Road, Commercial Road, Edmonton, London, N18 1SY	C&I / CDE	✓	9,935	-	20,359	-	8,719	~~Enfield~~	

Reference	Section	Further modification											Implications for the Habitats Regulations
		ENF 10	Rooke & Co Ltd, Edmonton	Montague Road Industrial Estate, 22-26 First Avenue, Edmonton, London, N18 3PH	C&I	✓	32,249	24,867	28,095	25,235	3,897	~~Enfield~~	
		ENF 11	Edmonton Bio Diesel Plant (Pure Fuels)	Unit A8 Hastingwood Trading Estate, Harbet Road, London, N18 3HT	C&I	✓	512	738	895	1,251	-	~~Enfield~~	
		ENF 12	Camden Plant~~, Lower Hall Lane, Chingford~~	Camden Plant, Lower Hall	CDE	✓	236,950	232,590	241,900	216,334	206,806	~~Enfield~~	

Reference	Section	Further modification											Implications for the Habitats Regulations
				Lane, Chingford									
		ENF 13	Personnel Hygiene Services Ltd, Princes Road, Upper Edmonton	10 Princes Road, Edmonton, London, N18 3PR	C&I	X	0	0	95	1,004	1,081	~~Enfield~~	
		ENF14	Vacant (Formerly Lea Valley motors Ltd)	Second Avenue, Edmonton	C&I	N/A	0	0	0	0	0		
		ENF 15	~~Yard 10 - 12 Hastingwood Trading Est.~~ A & A	Yard 10-12 Hastingwood Trading Estate, Harbet Road,	C&I	✓ (89%)	0	0	9,391	16,277	10,696	~~Enfield~~	

Reference	Section	Further modification										Implications for the Habitats Regulations
			Skip Hire Limited	Edmonton, London, N18 3HR								
		ENF 17	Albert Works~~,~~ ~~Kenninghall Road, Edmonton~~	Albert Works, Kenninghall Road, Edmonton, London, N18 2PD	C&I	✓	193,308	224,020	233,225	211,424	-	~~Enfield~~
		ENF18	Edmonton Energy from Waste Facility	Edmonton Ecopark, Advent Way, Edmonton, London, N18 3AG	LACW	✓	546,402	526,829	560,685	550,408	597,134	
			LondonEnergy Ltd Composting	Edmonton Ecopark, Advent Way,	LACW	✓	32,498	32,779	35,241	32,475	33,981	

Reference	Section	Further modification											Implications for the Habitats Regulations
				Edmonton, London, N18 3AG									
			LondonEnergy Bulk Waste Recycling Facility	Edmonton Ecopark, Advent Way, Edmonton, London, N18 3AG	LACW	X	192,907	190,333	168,121	157,227	198,389		
			Ballast Phoenix Ltd	Edmonton Ecopark, Advent Way, Edmonton, London, N18 3AG	LACW	✓	58,255	106,341	112,419	109,114	101,189		
		~~ENF 19~~	~~London Waste Ltd Composting, Edmonton~~		C&I	✓ (59%)	85,103	69,124	64,897	77,305	88,636	~~Enfield~~	

Reference	Section	Further modification											Implications for the Habitats Regulations
			~~Eco Park, Advent Way~~										
		~~ENF 20~~	~~London Waste Bulk Waste Recycling Facility, Edmonton EcoPark, Advent Way~~		C&I / CDE	✓ (84%)	10,282	7,495	10,011	13,489	14,428	~~Enfield~~	
		~~ENF 20~~	~~London Waste Ltd, Edmonton Ecopark, Advent Way~~		Hazardous (WEEE)	✓	2,447	1,327	9,194	11,400	67	~~Enfield~~	
		~~ENF 22~~	~~Edmonton Clinical Waste Treatment Centre~~		C&I / CDE	✓	27,319	18,664	43,851	23,490	49,754	~~Enfield~~	

Reference	Section	Further modification											Implications for the Habitats Regulations
		ENF 23	J O' Doherty Haulage, Nobel Road, Edmonton	Pegamoid Site, Nobel Road, Edmonton, London, N18 3BH	C&I / CDE	✓	0	7,150	26,545	15,501	11,337	~~Enfield~~	
		ENF 24	Oakwood Plant Ltd, Edmonton	Oakwood House, Nobel Road, Eley Industrial Estate, Edmonton, London, N18 3BH	C&I / CDE	✓	-	8,892	13,652	7,344	-	~~Enfield~~	
		ENF 25	Environcom Ltd (Edmonton Facility) ~~, Stonehill Business~~	Unit 8a Towpath Road Stonehill Business		-	14,992	33,720	4,200	0	0	~~Enfield~~	

Reference	Section	Further modification										Implications for the Habitats Regulations
			~~Park, Edmonton~~	Park, N18 3QU								
		ENF 26	Powerday Plant Ltd, Jeffreys Road	Unit 2, Jeffrey's Road, Brimsdown, Enfield, Middlesex, EN3 7UA	Hazardous (C&I)	✓	-	-	-	-	6,557	~~Enfield~~
		~~ENF 27~~	~~Edmonton EFW~~		CDE	✓						~~Enfield~~
		ENF30	Hunsdon Skip Hire (Previously L&M Skips and London & Metropolitan Recycling)	Unit 1, 1b Towpath Rd, Stonehill Business Park, London, N18 3QX	C&I	X	17,466	17,124	19,231	19,507	18,427	

Reference	Section	Further modification											Implications for the Habitats Regulations
		ENF 31	Volker Highways Ltd	15 Edison Road, Brimsdown Industrial Estate, Enfield EN3 7BY	LACW	X	10,715	14,556	13,837	11,541	16,923	~~Enfield~~	
		~~ENF 32~~	~~Guy Lodge Farm~~		C&I	✓	63	63	26	29	37	~~Enfield~~	
		~~ENF 33~~	~~Ballast Phoenix Ltd~~		C&I (clinical)	✓	1,615	1,705	2,396	2,276	-	~~Enfield~~	
		~~ENF 34~~	~~London & Metropolitan Recycling Facility~~		LACW	✓ (76%)	16,115	11,732	12,659	10,125	15,410	~~Enfield~~	
		ENF 35	Redcorn (ELV) ~~Unit 25 Enfield Metal~~	22a & 24, Stacey Avenue, Montagu Industrial	C&I / CDE	X	16,855	27,043	28,566	23,004	21,974	~~Enfield~~	

Reference	Section	Further modification											Implications for the Habitats Regulations
			~~Kingswood Nursery, Theobalds Park road~~	Estate, Enfield, N18 3PS									
		~~ENF 36~~	~~Greenstar Environmental~~		C&I / CDE	-	834	802	1,778	0	0	~~Enfield~~	
		ENF37	GBN	Gibbs Road, Montagu Industrial Estate, London, N18 3PU	LACW / C&I	✓ (84%)	231,771	72,530	271,888	276,855	270,106		
		HAC 1	Millfields Waste Transfer & Recycling Facility	Millfields Recycling Facility, Millfields Road, Hackney,	LACW	X	18,202	13,935	14,173	16,785	16,725	~~Hackney~~	

Reference	Section	Further modification											Implications for the Habitats Regulations
				London, E5 0AR									
		HAC 2	Downs Road Service Station ~~(Braydon Motor Company), Clapton~~	1A Downs Road, Clapton, London, E5 8QJ	C&I	✓	177	175	96	101	-	~~Hackney~~	
		~~HAR 1/2~~	~~Hornsey Central Depot, Haringey LBC~~									~~Haringey~~	
		HAR 3	Biffa Waste Services Ltd, Garman Road, Tottenham	81, Garman Road, Tottenham, London, N17 0UN	C&I	✓	28,851	30,355	34,690	33,704	37,454	~~Haringey~~	

Reference	Section	Further modification											Implications for the Habitats Regulations
		HAR 4	O'Donovan, Markfield Rd, Tottenham	100a Markfield Road, Tottenham, London, N15 4QF	C&I / CDE	✓ (50%)	6,316	10,099	11,143	7,035	14,693	~~Haringey~~	
		HAR 5	Redcorn Ltd, White Hart Lane, Tottenham	44 White Hart Lane, Tottenham, London N17 8DP	C&I	✓	15,712	22,733	23,852	8,508	-	~~Haringey~~	
		HAR 6	Restore Community Projects~~, Ashley Road, Tottenham~~	Unit 18, Ashley Road, Tottenham Hale, London, N17 9LJ	C&I	✓	24	103	185	278	98	~~Haringey~~	
		HAR 7	Redcorn / Brantwood Auto	Brantwood Road, Tottenham,	C&I	✓	2,470	5,225	2,250	23,779	39,283	~~Haringey~~	

Reference	Section	Further modification											Implications for the Habitats Regulations
			Recycling Ltd~~,~~ ~~Willoughby Lane~~	London N17 0ED									
		HAR 8	O'Donovan~~,~~ ~~Markfield Road,~~ ~~Tottenham~~	82 Markfield Road, Tottenham, London, N15 4QF	CDE	✓	5,079	27,330	31,460	25,674	123,308	~~Haringey~~	
		HAR 9	Park View Road Reuse and Recycling Centre	Civic Amenity Site, Park View Road, Tottenham, London, N17 9AY	LACW	X	3,706	2,409	6,326	5,499	5,745	~~Haringey~~	
		HAR 10	~~LondonWaste Ltd.~~ Western Road Re-use	Western Road,	LACW	X	0	0	2,526	4,851	3,799	~~Haringey~~	

Reference	Section	Further modification										Implications for the Habitats Regulations
			& Recycling Centre ~~H W R C~~	Haringey N22 6UG								
		HAR11	Durnford Street Car Dismantlers & Breakers	6-40, Durnford Street, Tottenham, London, N15 5NQ	C&I	✓	0	0	0	432	288	
		ISL 1	Hornsey Household Re-use & Recycling Centre and Transfer Station	Hornsey Street, Islington London N7 8HU	LACW	X	196,818	195,018	203,919	204,496	212,232	~~Islington~~
		WAF1	Mercedes Parts Centre	21 Chingford Industrial Estate, Hall Lane,	C&I	✓	0	0	0	0	7	

Reference	Section	Further modification											Implications for the Habitats Regulations
				Chingford, London, E4 8DJ									
		WAF 2	Kings Road Household Waste Recycling Centre	Civic Amenity Site, 48 Kings Road, Chingford, London, E4 7HR	LACW	X	1,213	881	2,178	2,400	2,853	~~Waltham Forest~~	
		WAF 3	South Access Road Household Waste Recycling Centre	42a South Access Road, Walthamstow London, E17 8BA	LACW	X	2,917	2,784	6,790	6,949	7,203	~~Waltham Forest~~	
		~~WAF 4~~	~~G B N Services, Estate Way, Leyton~~									~~Waltham Forest~~	

Reference	Section	Further modification											Implications for the Habitats Regulations
		WAF 5	Vacant (previously T J Autos (U K) Ltd)	17 Rigg Approach, Leyton, London, E10 7QN	C&I	✓	53	53	81	21	11	~~Waltham Forest~~	
		~~WAF 6~~	~~B J Electronics, Ravenswood road Industrial Estate, Walthamstow~~									~~Waltham Forest~~	
		WAF 8	Leyton Reuse & Recycling Centre	Gateway Road, Leyton, London, E10 5BY	LACW	X	2,164	2,255	2,564	3,003	2,589	~~Waltham Forest~~	
		WAF9	Vacant	Roxwell Trading	C&I	-	0	0	0	0	0		

Reference	Section	Further modification											Implications for the Habitats Regulations
			(formerly B D & G Parts For Rover)	Park, Leyton									
		WAF 10	Malby Waste Disposal Ltd, Staffa Road, Leyton	5 Staffa Road, Leyton, London, E10 7PY	C&I / CDE	X	6,700	10,682	12,624	7,339	9,925	~~Waltham Forest~~	
		WAF 12~~1~~	Argall Metal Recycling ~~Baseforce Metals, Unit 1 Staffa Road, Leyton~~	Unit 1, Staffa Road, E10 7PY	C&I	✓	0	21,537	31,603	30,378	0	~~Waltham Forest~~	
		WAF 14	Tipmasters	15 Rigg Approach London Greater	C&I	X	0	0	586	2,847	3,622	~~Waltham Forest~~	

<table>
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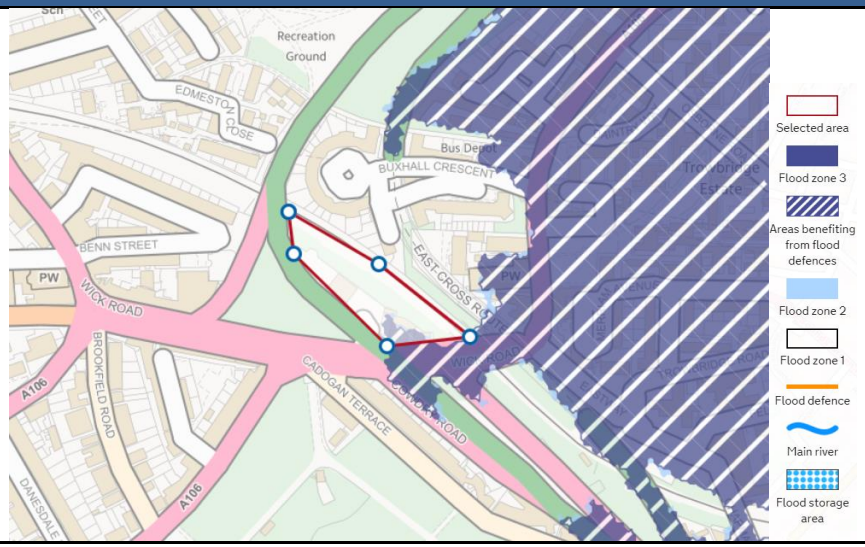
<table>
<tr><td></td><td></td><td>London E10 7QN</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>~~WAF 15~~</td><td>~~Bits and Parts~~</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>~~Waltham Forest~~</td></tr>
<tr><td>WAF16</td><td>Whipps Cross Hospital Clinical Waste Treatment Facility</td><td>Whipps Cross Hospital, Whipps Cross Road, London, E11 1NR</td><td>C&I (clinical)</td><td>X</td><td>0</td><td>0</td><td>0</td><td>0</td><td>5</td><td></td></tr>
</table>
</td><td></td></tr>
<tr><td>MM106</td><td>Appendix 2: Barnet Area Profiles</td><td>A05-BA Connaught Business Centre
<table><tr><td>Historic Environment</td><td>~~No assets identified in vicinity.~~ Within Watling Street Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</td></tr></table></td><td>None</td></tr>
<tr><td>MM107</td><td>Appendix 2: Enfield</td><td>12-EN Eleys Estate, Enfield</td><td>None</td></tr>
</table>

Reference	Section	Further modification		Implications for the Habitats Regulations
	Area Profiles	**Historic Environment**	Historic England commented that development should avoid harm to the historic environment and the setting of Chingford Mill Pumping Station (grade II) should be considered~~. The potential archaeology value of area should be considered~~ along with the setting of Montagu Road Cemeteries Conservation Area. <u>Within the Lea Valley West Bank Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</u>	
MM108	Appendix 2: Hackney Area Profiles	A15-HC Millfields LSIS		None
		Historic Environment	There are three Grade II listed buildings adjacent to the west of site: • Hackney Borough Disinfecting Station <u>(on Heritage at Risk Register)</u> • Shelter House • Caretakers Lodge The Mandeville Primary School which is Grade II listed is situated to the south of the area.	

Reference	Section	Further modification		Implications for the Habitats Regulations
			Historic England has commented that any development within the area located to the east and north of these assets must address their long term conservation needs in a comprehensive manner. Within Lea Valley Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.	
MM109	Appendix 2: Hackney LLDC Area Profiles	LLDC1-HC Bartrip Street		None
		Flood Risk	~~Part of the southern area of Bartip St LSIS is within Flood Zone 2 (medium risk) although the area benefits from flood defences.~~ ~~The area is at risk from surface water flooding.~~ The site area is largely within Flood Zone 1 with the southern most part falling partially within Flood Zones 2 and 3, noting that the Flood Zone 3 is within an area benefiting from defence. The site area would be suitable for the proposed "Less Vulnerable" developments. It is therefore considered that the site area should pass the sequential test. The exception test would not be applicable. The site area is shown to flood from the River Lea / Lee Navigation in the 1% AEP event (without defences) and this will potentially increase with the future with 1% AEP event covering a greater extent of the site. The River Lea / Lee Navigation benefits from	

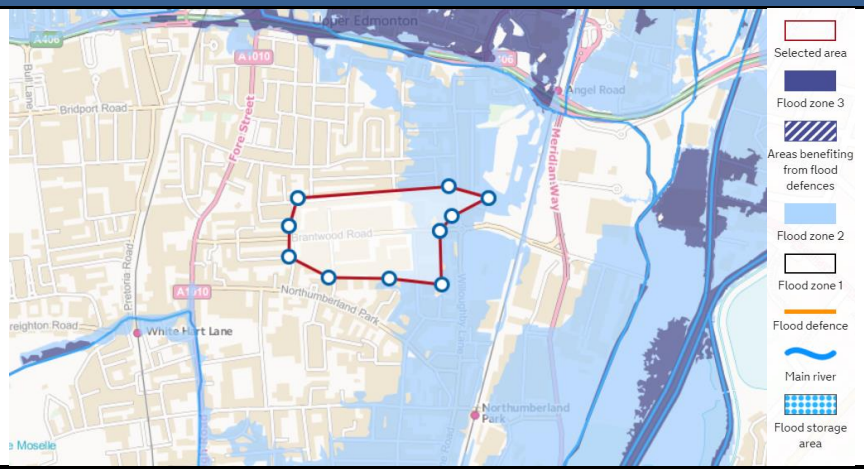
Reference	Section	Further modification	Implications for the Habitats Regulations
		defences and a site-specific flood risk assessment should consider how much these benefit the site area. A flood risk assessment would be required for any redevelopment. This will need to incorporate the following climate change allowances into the assessment: • Use central (25% increase from 2070 to 2115) for peak river flow. • Use central (20% increase from 2070 to 2115) and upper end (40% increase from 2070 to 2115) for peak rainfall intensity. Part of the site area benefits from existing flood defences. [updated map]	

Reference	Section	Further modification	Implications for the Habitats Regulations
			
MM110	Appendix 2: Hackney LLDC Area Profiles	LLDC2-HC Chapman Road (Palace Close) Flood Risk: ~~Flood Zone 2 (Medium probability of flooding) however the area benefits from flood defences.~~ ~~The area is at risk from surface water flooding.~~ The site area falls partially within Flood Zone 1 and 2 but is largely in Flood Zone 3, noting that this is within an area benefiting from defences. The site area would be suitable for the proposed "Less Vulnerable" developments, however it may be sequentially less preferable than other site areas listed based on the proportions of Flood Zone 1, 2 and 3 and the residual risk to the site area. It is therefore considered that	None

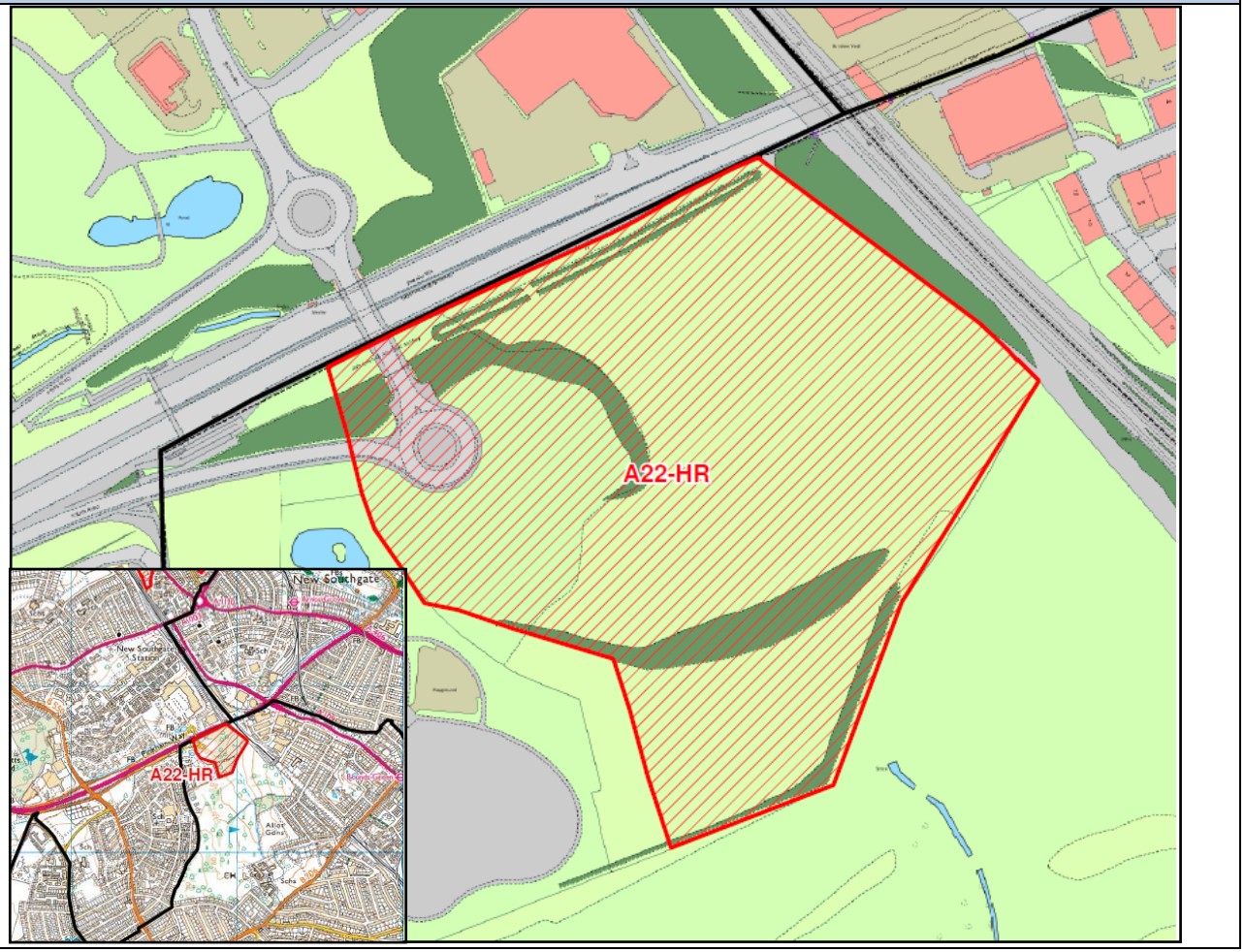
Reference	Section	Further modification		Implications for the Habitats Regulations
			the site area should pass the sequential test. The exception test would not be applicable. The site area is shown to flood from the River Lea / Lee Navigation in the 1% AEP event (without defences) and this will potentially increase with the future with 1% AEP event covering a greater extent of the site area. The River Lea / Lee Navigation benefits from defences and a site-specific flood risk assessment should consider how much these benefit the site area. A flood risk assessment would be required for any redevelopment. This will need to incorporate the following climate change allowances into the assessment: • Use central (25% increase from 2070 to 2115) for peak river flow. • Use central (20% increase from 2070 to 2115) and upper end (40% increase from 2070 to 2115) for peak rainfall intensity. The majority of the site area benefits from existing flood defence. [updated map]	

Reference	Section	Further modification		Implications for the Habitats Regulations
MM111	Appendix 2: Haringey Area Profiles	A19-HR Brantwood Road		None
		Flood Risk	~~The eastern section of the area lies within Flood Zone 2 (medium probability of flooding).~~ ~~The area is at risk from surface water flooding.~~ The site area is largely Flood Zone 1 with the western most part of the site area falling partially within Flood Zone 2. The site area is considered suitable for the proposed "Less Vulnerable" developments. It is therefore considered that the site area should pass the sequential test. The exception test would not be applicable. Note that the site area may	

Reference	Section	Further modification		Implications for the Habitats Regulations
			also be suitable for "More Vulnerable" developments, as this would pass the sequential test. The exception test would not be applicable. The site area is shown to flood from the Pymmes Brook in the 0.1% AEP event (without defences) and this will increase with the future 1% AEP event to cover approximately one quarter of the site area. A flood risk assessment would be required for any redevelopment. This will need to incorporate the following climate change allowances into the assessment: • Use central (25% increase from 2070 to 2115) for peak river flow. • Use central (20% increase from 2070 to 2115) and upper end (40% increase from 2070 to 2115) for peak rainfall intensity. [updated map]	

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for the Habitats Regulations</th></tr>
<tr><td></td><td></td><td> 
</td><td></td></tr>
<tr><td>MM112</td><td>Appendix 2: Haringey Area Profiles</td><td>A21-HR North East Tottenham

<table><tr><td>Historic Environment</td><td><s>No assets identified in vicinity.</s> <u>Within the Lee Valley Archaeological Priority Area.- Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</u></td></tr></table></td><td>None</td></tr>
</table>

MM113	Appendix 2: Haringey Area Profiles	A22-HR Pinkham Way **A22-HR – Friern Barnet Sewage Works (LEA 4) /Pinkham Way, Haringey**  	None

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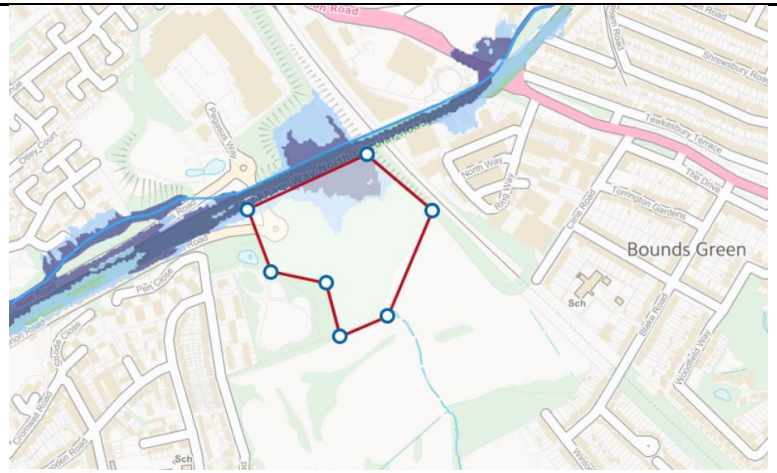
Area Details	
Borough	Haringey
Type of Location	Area
Location Reference	A22-HR – Friern Barnet Sewage Works (LEA 4) /Pinkham Way
Size	5.95 ha
Area Description	Land is currently unused and has become over grown with trees and vegetation.
Description of surrounding uses	Pinkham Way and retail park to north, industrial properties east. Golf course south and a park and residential properties to the west.
Planning Information	
Planning Designation	The Area is designated a Local Employment Area (LEA) and a Borough SINC.
Relevant Local Plan Policy	The Area is subject to Local Plan policy SP8: Employment. Friern Barnet ~~site~~ Area falls within the Borough's Specific Proposal 5, Employment generating uses subject to no adverse effect on the nature conservation value of the ~~site~~ Area. The area is subject to policy SP13: Open Space and Biodiversity. Friern Barnet is allocated as Borough Grade 1 SINC, and for employment uses in the Local Plan.
Land Use	
Co-location	This Area would allow for co-location with complementary activities due to its size and highway accessibility.
Major New Developments	None identified locally

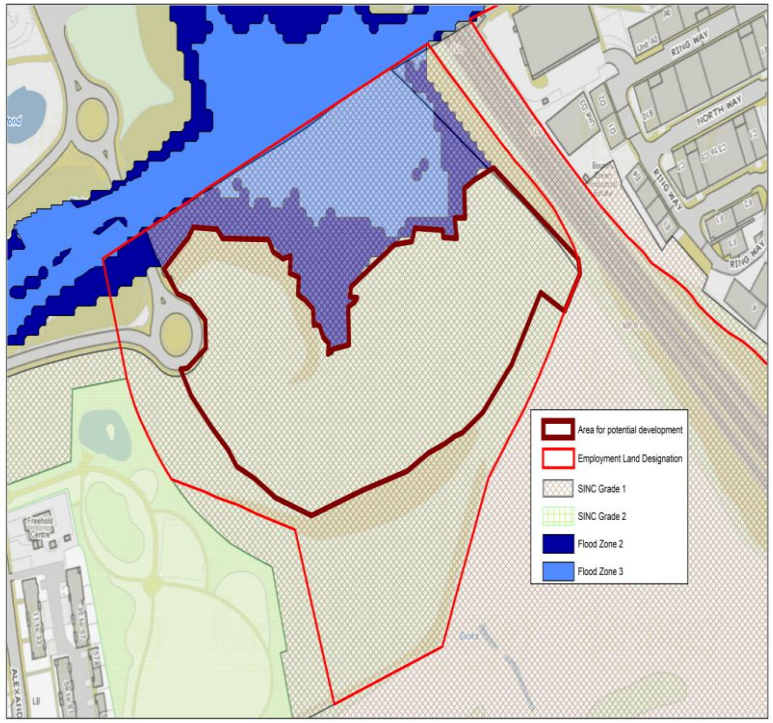
		Decentralised Energy Network	The Enfield potential Decentralised Energy area lies approximately 65m northeast of Friern Barnet. Not considered to be a practical option due to distance from potential users. Friern Barnet is in an area of low energy consumption (as ~~site~~ Area undeveloped). Areas northeast, east and west of ~~site~~ Area are high energy consumption zones.		
		Details of in-situ infrastructure	None identified		
		Constraints			
		Flood Risk	~~North boundary and northeast corner of the area is within Flood Zone 2 (medium probability of flooding).~~ ~~Any development on the area will increase impermeable surfaces and therefore increases surface water runoff which would need to be managed. It is understood that historical use of the area may have left contamination. It is unknown whether or not this previous use has an impact on the quality of groundwater. This could be ascertained through any planning application which may offer the opportunity to provide appropriate remediation.~~ The ~~site~~ Area is largely within Flood Zone 1 with a small area to the north of the ~~site~~ Area falling partially within Flood Zones 2 and 3. It is considered that the ~~site~~ Area would be suitable for the proposed "Less Vulnerable" developments. The ~~site~~ Area would pass the sequential test. The exception test would not be applicable. Part of the ~~site~~ Area is shown to flood from the Bounds Green Brook in the 1% AEP event (without defences) and this will potentially increase in the future with 1% AEP event covering a greater extent of the ~~site~~ Area.		

				A flood risk assessment will therefore be required for any redevelopment. This will need to incorporate the following climate change allowances into the assessment: • Use central (25% increase from 2070 to 2115) for peak river flow. • Use central (20% increase from 2070 to 2115) and upper end (40% increase from 2070 to 2115) for peak rainfall intensity. [updated map below		

						
		Surface and Groundwater	Not within a Source Protection Zone or ~~principle~~ principal aquifer. Bounds Green Brook lies approximately 40m north of ~~site~~ Area. A pond lies approximately 10m west of ~~site~~ Area and unnamed water course lies approximately 20m south of ~~site~~ Area.			

		Land Instability	The Environment Agency records historic landfilling in the area. This may represent a ground stability issue and as such further investigation will be required at the planning application stage.			
		Sensitive Receptors (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Residential properties lie west of Friern Barnet. Given the scale of the area there is scope to create a buffer around any waste management facility and orientate the facility away from residents.			
		Nature Conservation	Area is within a Borough Site of Importance for Nature Conservation which includes the adjacent Park and Golf Club. A number of ecology surveys have been undertaken and identified habitat of "potential value to a number of protected and notable species". There is an ecological corridor to the east of the area along the railway embankment. Japanese Knotweed and Giant Hogweed have been identified in abundance across ~~site~~ Area. There is currently no active management of the SINC.			
		Green Belt and Open Space	Land adjacent to the south and west of the area is designated as Metropolitan Open Land.			
		Historic Environment	No features identified			
		Highways	The Area would require the creation of an access to the roundabout on Orion Road/Pegasus Way. This would need to be designed to allow HGVs and refuse vehicles. The existing roundabout is suitable for these movements. Access to the North Circular is relatively easy from either Orion Road [heading east] or from Pegasus Way [to head west]. The Colney Hatch Lane/North Circular Road junction suffers from congestion at peak times. Use of the ~~site~~ Area for waste would add to HGV/refuse vehicle movement but is unlikely to have a significant impact on the operation of this junction, based on 60 in/out movements per day for refuse vehicles plus 40 bulk transport in/out movements.			

Conclusion	
Potential Uses	~~Integrated resource recovery facilities/resource parks, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment~~ Waste transfer, ~~processing and~~ Rrecycling, ~~indoor c~~Composting, including indoor in-vessel composting and outdoor composting. ~~Thermal Treatment facilities may be viable but should only be considered if a combined heat and power facility could be incorporated into the facility and linked up to a district heating system.~~ Areas not lying within Flood Zone 3 are potentially suitable to handle hazardous waste.
Uses unlikely to be suitable	N/A
Potential mitigation measures	The Area covers land owned separately by the North London Waste Authority and the London Borough of Barnet. There are a number of policy, environmental and amenity issues facing this area, although it previously accommodated a sewage treatment works. The Area has revegetated, contains a number of mature trees and is designated as a SINC. Due to the number of designations affecting this Area, only a proportion of the overall area will be suitable for development. Given the land is in two ownerships, development would be better suited on land in the control of the NLWA to ensure deliverability. New development should be located in areas with the lowest risk of flooding. The map below shows the area of the Priority Area within which a site could come forward once land at risk of flooding and land outside NLWA ownership has been removed.



Given the constraints on the Area, the site footprint should be minimised, taking into account the necessary operational elements of a waste facility, for example space for turning and parking for waste vehicles, processing area with sufficient room for equipment for waste treatment, and areas for the storage and stockpiling of materials. This should be on level areas where feasible.

The location of new development should take the opportunity to create an appropriate buffer zone between the proposed facility and nearby sensitive receptors, including residential properties.

Any new waste facility in this Priority Area will need to be in line with the Haringey's Local Plan and the London Plan. There are community concerns around the development of a waste facility within this Area and how this will affect the natural environment, flood risk and biodiversity in the Area. Specific policy considerations on this topic are set out below.

In line with London Plan policy G6: 'Biodiversity and access to nature', development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. In line with London Plan policy G7: 'Trees and Woodland', development proposals should ensure that, wherever possible, existing trees of value are retained.

In line with Local Plan policy DM19: 'Nature Conservation', development proposals should protect and enhance the nature conservation value of the area. Development that has a direct or indirect adverse impact upon important ecological assets will only be permitted where the harm cannot be reasonably avoided and it has been suitably demonstrated that appropriate mitigation can address the harm caused.

In line with London Plan Policy G6D, any development needs to achieve biodiversity net gain that leaves the biodiversity in a better state than before the development. This should be outside the areas at risk of flooding (Zone 2 and 3), suitably buffered from the ecological corridor to the east of the area, and subject to up-to-date Biodiversity and Wildlife surveys, be on land that is not identified as having priority species or habitats.

				An appropriate ecological survey will be required to identify significant ecological features to retain or replace. Consideration should be given to the retention and protection of existing mature trees and the designation and management of appropriate areas of habitat to be retained and enhanced. Mitigation measures should include continued habitat connectivity with the adjacent green spaces and ecological corridor along the railway embankment that needs to be retained and enhanced. ~~Incorporating appropriate boundary treatments / landscaping, protecting existing green infrastructure features, undertaking appropriate ecological surveys and creating replacement habitat are likely to be important mitigation measures.~~ In line with Local Plan policy DM21: 'Sustainable Design, Layout and Construction', buildings within the development should be designed to complement nature conservation by maximising opportunities to enhance biodiversity, including through appropriate landscaping, Sustainable Drainage Systems, living roofs and green walls. Mitigation measures would be required to protect the amenity of sensitive receptors including hours of working, noise and odour suppression. ~~Consideration should also be given to the creation of an appropriate buffer between waste management facility and nearby sensitive receptors.~~ [Referenced elsewhere] Provision of an acceptable access ~~of~~ from Orion Road Roundabout would be required. Any application should demonstrate how public access to the remainder of the Area could be achieved.		

				Any application will need to have regard to the needs of different users of the Area to ensure the safe operation of the waste management facility. A contamination and ground stability appraisal would be required to assess potential impacts from the historic landfill within the Area boundary. As parts of the Area are at a medium risk of flooding, the completion of a suitable Flood Risk Assessment and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures. Any necessary SuDS should be designed to integrate with other nature conservation elements. ~~For any proposed development which involves an increase in built footprint within the modelled extent of the 1 in 100 chance in any year flood event, taking the impacts of climate change into account, or where the footprint has been moved into a deeper area of floodplain than the existing built footprint, floodplain compensation will need to be provided on a volume-for-volume and level-for-level basis.~~		

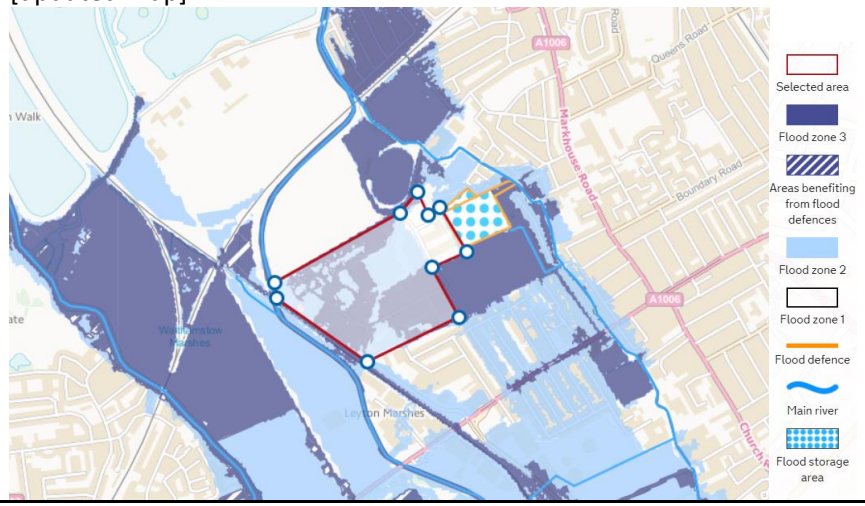
<table>
<tr>
<td>MM114</td>
<td>Appendix 2: Waltham Forest Area Profiles</td>
<td>A24-WF Argall Avenue

<table>
<tr><td>.Historic Environment</td><td><s>No assets identified in vicinity.</s> Within the River Lea and Tributaries Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</td></tr>
</table>

<table>
<tr><td>Flood Risk</td><td><s>The north of the area lies with Flood Zone 2 and 3 (medium to highest probability of flooding) with the southern tip lying within Zone 2.</s>
<s>A flood storage area lies adjacent to the east of the northeast corner of the area. Facilities within Flood Zone 3 should only deal with inert waste unless otherwise agreed with the Environment Agency.</s>

The site area falls partially within Flood Zone 1, Flood Zone 2 and Flood Zone 3. It is considered that the site area would be suitable for the proposed “Less Vulnerable” developments and should pass the sequential test, however it may be sequentially less preferable than other site areas listed based on the proportions of Flood Zone 1, 2 and 3. The exception test would not be applicable.

However, development should be avoided on the part of the site area which lies within the functional floodplain.</td></tr>
</table>
</td>
<td>None</td>
</tr>
</table>

				The site area is shown to flood from the River Lee and Dagenham Brook in the 1% AEP event (without defences) and this will potentially increase with the future with 1% AEP event covering a greater extent of the site area. A flood risk assessment would be required for any redevelopment. This will need to incorporate the following climate change allowances into the assessment: • Use central (25% increase from 2070 to 2115) and higher central (35% increase from 2070 to 2115) for peak river flow. • Use central (20% increase from 2070 to 2115) and upper end (40% increase from 2070 to 2115) for peak rainfall intensity. For any proposed development which involves an increase in built footprint within the modelled extent of the 1 in 100 chance in any year flood event, taking the impacts of climate change into account, or where the footprint has been moved into a deeper area of floodplain than the existing built footprint, floodplain compensation will need to be provided on a volume-for-volume and level-for-level basis. [updated map] 		

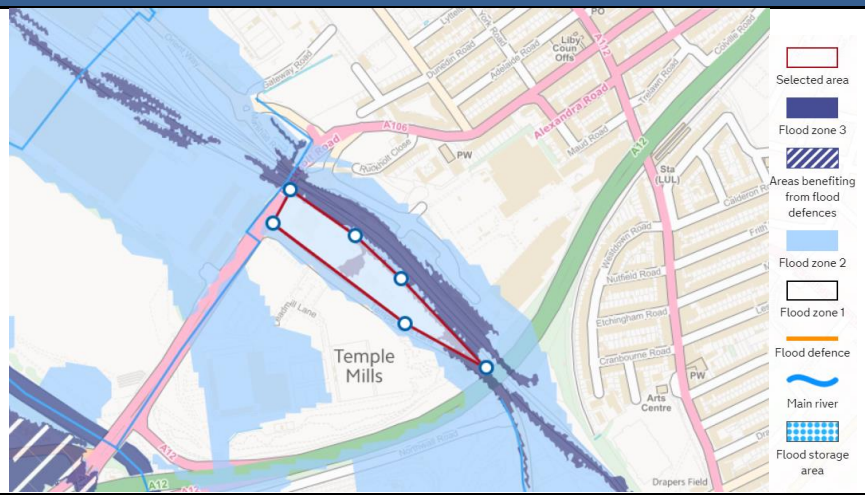
<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for the Habitats Regulations</th></tr>
<tr><td>MM115</td><td>Appendix 2: Waltham Forest LLDC Area Profiles</td><td>LLDC3-WF Temple Mill Lane

<table><tr><td>Historic Environment</td><td><s>No assets identified in vicinity.</s> Within the River Lea and Tributaries Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</td></tr></table>
<table><tr><td>Flood Risk</td><td><s>The majority of the site lies within Flood Zone 3 (highest probability of flooding). Parts of the eastern half of the area lie within Flood Zone 2 (medium probability of flooding).</s>
<s>Environment Agency – Facilities within Flood Zone 3 should only deal with inert waste unless otherwise agreed with the Environment Agency.</s>

The site area is largely Flood Zone 2 with a small area of Flood Zone3. It is therefore considered that the site area would be suitable for the proposed “Less Vulnerable” developments and should pass the sequential test. The exception test would not be applicable.

The site area is shown to flood from the River Lee and Dagenham Brook in the 1% AEP event (without defences) and this will potentially increase with the future with 1% AEP event covering a greater extent of the site area.</td></tr></table></td><td>None</td></tr>
</table>

Reference	Section	Further modification		Implications for the Habitats Regulations
			A flood risk assessment would be required for any redevelopment. This will need to incorporate the following climate change allowances into the assessment: • Use central (25% increase from 2070 to 2115) and higher central (35% increase from 2070 to 2115) for peak river flow. • Use central (20% increase from 2070 to 2115) and upper end (40% increase from 2070 to 2115) for peak rainfall intensity. For any proposed development which involves an increase in built footprint within the modelled extent of the 1 in 100 chance in any year flood event, taking the impacts of climate change into account, or where the footprint has been moved into a deeper area of floodplain than the existing built footprint, floodplain compensation will need to be provided on a volume-for-volume and level-for-level basis. [updated map]	

Reference	Section	Further modification	Implications for the Habitats Regulations
			

Summary and Conclusions

The review of the main modifications concludes that –

- The Main Modifications have no significant implications for the HRA conclusions at Submission draft stage, or they serve to reinforce/strengthen mitigation of potential effects on European sites.

- The conclusion of the HRA of the NLWP, as amended by the proposed main modifications, therefore remains that the Plan will not have an adverse effect on the integrity of any European site, either alone or in-combination with other plans or projects, providing that the available safeguards are implemented.

Appendix C

Summary of Relevant Policies in relevant Local Plans and Core Strategies that may help to achieve the avoidance and/or mitigation of potential harmful effects of the implementation of the NLWP on European designated sites.

Council	Document	Policy Code	Wording	Reference
Enfield	Core Strategy 2010	CORE POLICY 36	BIODIVERSITY The Council will seek to protect, enhance, restore or add to biodiversity interests within the Borough, including parks, playing fields and other sports spaces, green corridors, waterways, sites, habitats and species identified at a European, national, London or local level as being of importance for nature conservation by: • Continuing to protect, restore, and enhance sites, habitats and species identified for their biodiversity importance at the national, London, or borough level. The Development Management Document will set out criteria to assess development proposals that are likely to have an adverse ecological impact; • Requiring improvements to biodiversity provision, with priority given to areas of deficiency identified in the Enfield Open Space Study and proposals which assist in achieving Biodiversity Action Plan objectives; • Reviewing the schedule of Sites of Importance for Nature Conservation in light of the findings of GLA survey of the Borough and other appropriate evidence, in order to set out a hierarchy of locally important sites in the Development Management Document; and • Preparing a Local Biodiversity Action Plan to set out the Borough's actions and objectives with regard to biodiversity, and to contribute towards the UK and London Biodiversity Action Plan targets and objectives	Enfield Council, 2010. CORE POLICY 36 BIODIVERSITY. *Core Strategy Adoption*, [Online]. November, 147. Available at: https://www.enfield.gov.uk/downloads/file/6928/enfield_core_strategy [Accessed 15 December 2014].

Enfield	Development Management Document	DMD 76	Wildlife Corridors Development on sites that include or abut a wildlife corridor will only be permitted if the proposal protects and enhances the corridor. This policy should be read in conjunction with Core Strategy Policy 36.	Enfield Council, 2014. DMD 76 Wildlife Corridors. *Enfield's Development Management Document Adopted*, [Online]. November, 114. Available at:http://www.enfield.gov.uk/downloads/file/10438/development_management_document_adopted_november_2014[Accessed 15 December 2014].
Enfield	Development Management Document	DMD 78	Nature Conservation Development that has a direct or indirect negative impact upon important ecological assets will only be permitted where the harm cannot reasonably be avoided and it has been demonstrated that appropriate mitigation can address the harm caused. Mitigation will be secured through planning obligations or planning conditions. Major development on sites located within areas of deficiency must maximise opportunities to improve access to nature. This policy should be read in conjunction with Core Strategy Policy 36.	Enfield Council, 2014. DMD 78 Nature Conservation. *Enfield's Development Management Document Adopted*, [Online]. November, 115. Available at:http://www.enfield.gov.uk/downloads/file/10438/development_management_document_adopted_november_2014[Accessed 15 December 2014].

Barnet	Core strategy	CS7	Enhancing and protecting Barnet's open spaces • protecting existing Sites of Importance for Nature Conservation and working with our partners including the London Wildlife Trust to improve protection and enhancement of biodiversity in Barnet • ensuring that development protects existing site ecology and makes the fullest contributions to enhancing biodiversity, both through on-site measures and by contribution to local biodiversity improvements;	Barnet Council, 2012. Policy CS7: Enhancing and protecting Barnet's open spaces. *Barnet's Local Plan (Core Strategy) Development Plan Document*, [Online]. September, 89. Available at:http://www.barnet.gov.uk/downloads/download/1000/adopted_local_plan-core_strategy_dpd [Accessed 15 December 2014].
Barnet	Development Management Policies	DM16	Biodiversity a. When considering development proposals the council will seek the retention and enhancement, or the creation of biodiversity. b. Where development will affect a Site of Importance for Nature Conservation and/or species of importance the council will expect the proposal to meet the requirements of London Plan Policy 7.19E.	Barnet Council, 2012. Policy DM16: Biodiversity. *Barnet's Local Plan - Development Management Policies*, [Online]. September, 58. Available at:http://www.barnet.gov.uk/downloads/download/1003/adopted_local_plan-development_managemen

			c. Development adjacent to or within areas identified as part of the Green Grid Framework will be required to make a contribution to the enhancement of the Green Grid.	t_policies_dpd [Accessed 15 December 2014].
Islington	Core Strategy	CS 15	Open space and green infrastructure D. Protecting and enhancing biodiversity across the borough and addressing deficiencies in access to nature. Sites of Importance for Nature Conservation (SINCs) will be protected in line with their hierarchical importance (26) and improvements to their biodiversity value will be supported. SINCs will be identified and designated in the Development Management Policies. Other key habitats, and priority species within them, will also be protected and enhanced including: • built environment canals, waterways and standing water (this includes ponds) parks and urban green spaces private gardens, community gardens, and allotments, railside land school grounds woodland acid grassland cemeteries other habitats deemed important for London	Islington Council, 2011. Policy CS 15 Open space and green infrastructure. *Islington's Core Strategy - YOUR NEIGHBOURHOOD YOUR ISLINGTON*, [Online]. February, 88-89. Available at:http://www.islington.gov.uk/publicrecords/library/Environmental-protection/Quality-and-performance/Reporting/2011-2012/%282012-03-03%29-Core-Strategy-February-2011.pdf [Accessed 15 December 2014].

Islington	Development Management Policies	DM6.5	Landscaping, trees and biodiversity A. Developments must protect, contribute to and enhance the landscape, biodiversity value and growing conditions of the development site and surrounding area, including protecting connectivity between habitats. Developments are required to maximise the provision of soft landscaping, including trees, shrubs and other vegetation, and maximise biodiversity benefits, including through the incorporation of wildlife habitats that complement surrounding habitats and support the council's Biodiversity Action Plan.	Islington Council, 2013. y DM6.5 Landscaping, trees and biodiversity. *Islington's Local Plan: June 2013 Development Management Policies*, [Online]. June, 105. Available at:http://www.islington.gov.uk/publicrecords/library/Planning-and-building-control/Publicity/Public-consultation/2013-2014/(2013-12-11)-Development-Management-Policies-(adopted-June-2013).pdf[Accessed 15 December 2014].
Waltham Forest	Core Strategy	CS5	Enhancing Green Infrastructure and Biodiversity The Council will endeavour to protect and enhance green infrastructure and biodiversity and to maximise access to open spaces across the Borough by:	Waltham Forest Council, 2012. Policy CS5 - Enhancing Green Infrastructure and Biodiversity. *Waltham Forest Local Development Framework - Core*

A) protecting Green Belt and Metropolitan Open Land (MOL) and improviding access where appropriate. Development and regeneration activity should be delivered principally through the use of brownfield land and buildings;

B) enhancing the green infrastructure network through better connectivity and the creation of new open spaces whilst also conserving their historic value;

C) establishing and extending the Borough's Greenways, Green Corridors; and, providing landscaping along transport routes where possible;

D) improviding the quality of, and access to, open spaces especially in areas of deficiency; E) ensuring the adequate provision and efficient use of allotments and other spaces on which to grow food and plants;

F) improviding and increasing the provision of burial space;

G) protecting, promoting and enhancing the Lee Valley Regional Park and Epping Forest;

H) safeguarding and improviding the quality, character, access and ecology of waterways in the Borough, and supporting the aims of the London Rivers Action Plan (LRAP);

Strategy, [Online]. March , 73 - 74. Available at:https://www.walthamforest.gov.uk/Documents/Core%20Strategy%20-%20Interim%20Final%20-%20V3%20-LR.pdf [Accessed 15 December 2014].

				Protecting and Improviding Biodiversity and Nature Conservation I) seeking to protect and enhance biodiversity, especially where habitats, species and sites are recognised at the international, national, regional and local levels and as outlined in the Waltham Forest, London and UK Biodiversity Action Plans (BAPs); J) creating and capturing opportunities for increasing the area and number of priority and locally important habitats; K) promoting public access and improved contact with nature; L) Local Nature Reserves should be maintained; and further reserves should be designated as documented in the Waltham Forest Biodiversity Action Plan; M) protecting existing healthy trees and encouraging the planting of new trees as informed by the Waltham Forest Tree Strategy;	
Waltham Forest	Development Management Policies	DM35	Biodiversity and Geodiversity Biodiversity		Waltham Forest Council, 2013. Policy DM35 Biodiversity and Geodiversity. *Waltham Forest Development Management Policies Local Plan*, [Online]. October 2013, 49 - 50.

A) Development proposals will not normally be granted planning permission where they pose adverse direct or indirect effects on any land or area within the identified Sites of Special Scientific Interest (SSSI), Sites of Importance to Nature Conservation (SINC), Special Areas of Conservation (SAC), RAMSAR sites, Special Protection Areas (See Schedules 13 to 16 and 24 to 26 and the Policies Map) or to protected or priority species. However, in an exceptional situation where such proposals are permitted, any damaging impacts should be prevented by appropriate mitigation measures or use of conditions.

Available at:http://www.walthamforest.gov.uk/Documents/DMPolicies%20Adoption%20Version%20October%202013.pdf[Accessed 15 December 2014].

B) Where there are existing biodiversity resources on-site or in the vicinity of a development site, the developer must provide measures for their retention, the integration of existing wildlife habitats and features, and their restoration and enhancement where appropriate. Where retention, restoration or enhancement measures are not considered possible, mitigation and compensation measures should be clearly set out with supporting evidence for their effectiveness and relevance in relation to supporting the specific biodiversity value of the borough and its key international sites.

			C) Where opportunities arise, development proposals must provide measures to support species and habitats through the use of landscaping on or adjacent to buildings. This may involve the inclusion of living roofs and walls or other measures which provide space for species to nest, roost or hibernate.	
Haringey	Strategic Policies	SP13	OPEN SPACE AND BIODIVERSITY New development shall protect and improve Haringey's parks and open spaces. All new development shall: Protect and enhance, and when and where possible, extend the existing boundaries of the borough's Green Belt, designated Metropolitan Open Land, designated Open Spaces, Green Chains, allotments, river corridors and other open spaces from inappropriate development;	Haringey Council, 2013. 6.3 SP13 OPEN SPACE AND BIODIVERSITY. *Haringey's Local Plan: Strategic Policies 2013 - 2026 (formerly the Core Strategy)*, [Online]. March, n/a. Available at:http://www.cartogold.co.uk/haringey/text/strategic_policies_2013_doc/06_safer_forall.htm#6.3 [Accessed 15 December 2014].

			All development shall protect and improve sites of biodiversity and nature conservation, including private gardens through its: Contribution to wildlife and ecological habitats and, where possible, include green and brown roofs, rainwater harvesting, green walls, bird and bat nesting/roosting opportunities; Protection, management and maintenance of existing trees and the planting of new trees where appropriate; and Protection, enhancement and creation of Sites of Importance for Nature Conservation (SINCs) and Local Nature Reserves (LNRs).	
Hackney	Development Management Local Plan	Policy DM32	Protection and Enhancement of Existing Open space and the Lee Valley Regional Park – The Council supports in principle the Lee Valley Regional Park Authority's Park Plan and Park Development Framework (PDF) adopted Area Proposals schedule for the area of the Park within Hackney. These will be important considerations in determining applications.	Hackney Development Management Local Plan https://www.hackney.gov.uk/development-management-DPD

Hackney	Development Management Local Plan	Policy DM34	SITES OF NATURE CONSERVATION AND / OR GEODIVERSITY VALUE, WALTHAMSTOW RESERVOIRS SPECIAL PROTECTION AREA AND WALTHAMSTOW MARSHES SITES OF SPECIAL SCIENTIFIC INTEREST Proposals for development adjacent to the SINCs including Springfield Park as an area of geodiversity value and a potential RIG and to the Walthamstow Reservoirs Special Protection Area and Walthamstow Marshes Sites of Special Scientific Interest, must not have a significant detrimental impact on the nature conservation value, geodiversity value and biodiversity of these sites. Mitigation and/or compensatory measures will be considered in assessing the impact on nature conservation, biodiversity and geodiversity.	Hackney Development Management Local Plan https://www.hackney.gov.uk/development-management-DPD
Hackney	Core Strategy	Policy 27	Biodiversity - The Council will protect, conserve and enhance nature conservation areas, in particular in and around Dalston and Shoreditch for their biodiversity value, and develop a local habitat network contributing to the wider Green Grid. Development will be encouraged to include measures that contribute to the borough's natural environment and biodiversity. Where appropriate, a biodiversity survey of the site must be carried out, with actions to enhance the biodiversity value, mitigate or compensate for any harm to habitats and / or species.	LDF Core Strategy https://www.hackney.gov.uk/core-strategy

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