

# **Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP**

Updated October 2020

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## Executive Summary

- I. An extensive site and area search and selection process was undertaken for the Draft NLWP and full details of this are set out in the Sites and Areas Report (July 2019). The final list of sites and areas was then taken forward into the Draft Plan and published for consultation. The Draft Plan provided the first opportunity for stakeholders to make comments on the potential locations for new facilities across North London.
- II. The methodology for identifying new sites and areas was broadly supported. However, representors also commented that too much land had been identified, the best performing areas and existing industrial areas should be the focus for new waste facilities, and a wider geographical distribution of facilities should be sought.
- III. In order to respond to these and other issues raised at consultation on the suitability of the proposed sites and areas, and the local impact of waste facilities which may come forward, the North London Boroughs undertook further work in order to identify which sites and areas should be taken forward in the proposed Submission version of the plan.
- IV. One of these areas of work was to develop a range of reasonable options to choose the most appropriate sites and areas. The details are brought together in this 'Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP' (Updated 2020). The options include and exclude areas based on their performance against qualitative assessment criteria, detailed in the Sites and Areas Report. In considering each option, the Boroughs have also taken into account the total land provided and geographical spread.
- V. The preferred option was Option 5: Band B, SIL and LSIS areas with a cap on land in Enfield. All the land in this option is either designated industrial land or a high-performing Band B site/area and the land-take (102ha) is significantly reduced from the Draft Plan (316ha). In addition it helps to provide a better geographical spread by capping the number of areas identified in Enfield. 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.
- VI. However, analysis of Option 5 identified a risk that all new waste facilities could still come forward in Enfield which would not respect Spatial Principle B or generally encourage a sustainable distribution. Facilities could also come forward on industrial land outside the identified Areas and would be considered against the Windfall Sites policy.
- VII. Therefore, in order to direct new waste facilities towards land assessed as most suitable, and help deliver a better geographical spread of sites, it is recommended that a 'Preferred Locations' sequential approach is taken forward into the Proposed

Submission Plan to ensure developers consider siting their facility within the Areas listed in Schedules 2 and 3 before other locations. In addition, to help redress the high proportion of North London's waste facilities already in Enfield (62%), developers should seek sites in Preferred Locations outside Enfield before considering sites within Enfield's Preferred Location.

## **1. Introduction**

A draft Sites and Areas Options Appraisal was prepared to support the Proposed Submission NLWP in 2019, however this was not published. The Sites and Areas Options Appraisal detailed how the identified sites areas in the Draft Plan were reduced to the areas in the Proposed Submission Plan.

The Sites and Areas Options Appraisal, which is reflected in the SA of the NLWP provides more detail on how and why the Preferred Locations for new waste facilities in Schedules 2 and 3 were chosen and why 102ha of land was identified to meet the need for 9ha identified in the Proposed Submission Plan.

Since the public hearings, a Data Study Addendum (July 2020) has been prepared and the indicative land required has been reduced to 6.4ha.

This Sites and Areas Options Appraisal has therefore been updated to reflect the new information and data since the public hearings.

## **2. The aims of the NLWP**

In preparing the Proposed Submission version of the NLWP, and deciding which sites and areas to take forward, the North London Boroughs took account the Aim, Strategic Objectives and Spatial Principles of the NLWP.

In terms of the locations of waste management facilities the overall Aim is to “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”.

This is taken forward in Strategic Objective 2 (SO2) which is “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”.

The amount of land deemed ‘sufficient’ to meet future waste management needs is estimated to be approximately 6.4ha in the Data Study Addendum. This amount 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.

Waste facilities are 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 best land for a range of new waste facilities.

One individual site for new waste facilities came forward through the call for sites process carried out by the North London Boroughs. This is the site known as Friern Barnet Sewage Works or Pinkham Way and was submitted by the North London Waste Authority. Because of the size (5.95ha) and constraints of the site, namely its dual designation of employment land and SINC, not all of it can or should be developed, it has been treated as an “area” in the NLWP rather than an individual site which is safeguarded only for waste use.

No other individual sites for new waste facilities were identified during the land search process. This means that it is not possible to identify the exact plot(s) of land which will deliver new waste capacity for North London. However, this is not unusual, particularly in a London context; most waste planning authorities are in a similar position and, without a specific site or sites to be safeguarded for new waste facilities, are taking an area-based approach to waste planning. This approach is supported by both the NPPW and the London Plan. An area-based approach is to identify areas, usually occupied industrial areas, which are suitable for new waste development.

Finding land ‘of the right type, in the right place’ is guided by national policy and regional policies, which direct new waste facilities towards industrial land. It is not possible to say with any certainty how much of North London’s industrial land could come forward for waste uses over the plan period as this depends on existing businesses vacating their sites and a waste operator being ready and able to locate on that same site. Therefore identifying a range of land suitable for new waste facilities is a reasonable way of creating “sufficient opportunities to meet the identified needs of their area” as required by the NPPW. Identifying a range of areas also provides the flexibility sought by waste operators. Should sites not come forward in one particular area, or if an area changes over the plan period to become unsuitable for waste uses, this approach ensures there are alternative land options available.

### **3. Sites and Areas in the Draft Plan**

An extensive site and area search and selection process was undertaken. Full details of the site selection exercise are set out in the [Sites and Areas Report \(July 2019\)](#). In summary it involved the following key stages:

- A detailed review of the existing waste sites, including any plans for expansion. This work indicated that there was insufficient capacity within existing sites to meet the expected waste arisings over the plan period.
- A call for sites exercise targeting existing operators, landowners and other interested parties requesting them to put forward for consideration. This provided one proposed new site.
- A land availability search in all boroughs for sites and areas suitable for the development of waste facilities.
- Assessing the list of sites and areas against selection criteria (see Table 7 in the [Sites and Areas Report](#)). This excluded some sites and areas from further consideration and identified those which may be suitable.
- Site visits to check and refine information from the desk based assessment and add further detailed assessment.

- A Sustainability Appraisal and Habitats Regulation Assessment of sites/areas.
- Consultation with Landowners.
- Sequential test for any sites lying within a level 2 or 3 flood risk zone to assess the potential impact of a waste development in this zone.
- Banding of sites and areas to identify the amount of mitigation required to make them acceptable in planning terms for a waste facility (see Table 3.1).
- Identifying the broad types of waste management facility which would be suitable on each site/area.

Table 3.1: Explanation of suitability Bands

<b>BAND A</b>	<b>BAND B</b>	<b>BAND C</b>	<b>BAND D</b>
Site is highly suitable for waste uses with only minimal mitigation required	Site is suitable for waste uses following appropriate mitigation	Site is possibly suitable for waste uses although there are significant mitigation issues to address	Site is not suitable for waste uses

The final list of sites and areas was then taken forward into the Draft Plan and published for consultation. The Draft Plan provided the first opportunity for stakeholders to make comments on the potential locations for new facilities across North London.

The methodology for identifying new sites and areas was broadly supported. However, some representors felt that too much land had been identified and that sites in ‘Band B’ should be prioritised. Other representors felt that all existing industrial areas should be identified as suitable for waste uses.

Around 70% of the comments received were objections to proposed sites and areas from local residents. These objections related to the particular characteristics of each location and mostly related to the impact of new waste development on the existing area. These concerns included proximity of residential properties, suitability of small sites/areas, impact on the environment, and concern over traffic, road safety, and access.

During the consultation on the Draft Plan some representors expressed a wish to see a wider geographical distribution of facilities in order to manage waste near to its source and redress the existing concentration of facilities in the Lee Valley corridor, which are mainly in Enfield.

Organisations including the Environment Agency, Greater London Authority, Lee Valley Regional Park Authority, Crossrail, National Grid, Historic England and Transport for London provided additional information on the proposed sites and areas.

#### **4. Further work arising from the Draft Plan consultation**

The NLWP Waste Data Studies identify capacity gaps for waste management in North London up to 2035 and calculates the amount of land needed to meet these gaps. The Data Study Addendum (2020) updates this work and provides an indicative land take of 6.4ha to meet the identified need for waste management in North London.

The Draft Plan contained areas totalling around 316 hectares. Therefore, there was scope to reduce the amount of land being identified as suitable in the Proposed Submission Plan while still ensuring there is sufficient land to provide opportunities for new waste facilities to come forward and allow for flexibility. As mentioned above, it is not possible to say with any certainty how much of North London's occupied industrial land could come forward for waste uses over the plan period, however the greater the reserve of land identified to provide 'sufficient opportunities' for 6.4ha to be developed for waste facilities, the greater the likelihood of land coming forward. Therefore reducing the amount of land identified as suitable for waste uses needs to be balanced with providing sufficient opportunity for sites to come forward.

In order to respond to issues raised at Draft Plan consultation on the suitability of the proposed sites and areas, and the local impact of waste facilities which may come forward, the North London Boroughs identified four areas of further work in order to identify which sites and areas should be taken forward:

- A. Gather and assess additional information on sites/areas
- B. Seek a better geographical spread of waste facilities
- C. Changes to policy wording on reducing the impact of new waste development
- D. Consider alternative options for taking sites and areas forward

*A. Gathering and assessing additional information on sites/areas*

In order to better inform the choice of sites and ensure the site/area assessments are more detailed, holistic, robust and sensitive to a wider range of issues, further work was undertaken to gather and assess any additional information on the proposed sites and areas received during the consultation or as a result of new data being published. The sites/areas assessment proformas and site/area profiles were then updated accordingly and can be used as a guide for developers wishing to build new waste facilities in one of the Preferred Locations. This work included:

- Carrying out a transport assessment on sites/areas. Details were gathered on congestion, road safety, capacity, suitability, and access in liaison with borough transport officers. Information was collected about the current situation and the potential impact of a future facility based on a number of assumptions;
- Identifying potential mitigation measures in greater detail;
- Adding the latest information relating to flooding, groundwater, and proximity to rivers.
- Further clarification on the siting of new facilities within an Area, for example away from sensitive receptors;
- Identifying the suitability of each site/area for a hazardous waste facility (related to flooding);
- Adding details of National Grid assets, including substations, within the sites/areas;
- Adding details of heritage assets which could be impacted by development;



- Identifying if any sites/areas are in an Opportunity Area, Housing Zone, Lee Valley Regional Park or near proposed route of Crossrail2 and noting the impact of this; and
- Incorporating findings from Sustainability Appraisal (SA) and Habitats regulations Assessments (HRA).

This work resulted in the removal of some sites areas from Schedule 2 (see Appendix A of this Report), and refined the amount of land considered most suitable for new waste facilities in some of the areas. See the [Sites and Areas Report](#) (2019) for further information.

*B. Seek a better geographical spread of waste facilities*

One of the outcomes of the Draft Plan consultation was to seek a better spread of waste facilities across North London. Currently there is a concentration of waste uses in the Lee Valley corridor, for historical reasons, in particular in Enfield. This is shown in the table below which shows the amount of land currently in waste use in each Borough. The updated information is taken from the site sizes in Appendix B: Existing Waste Sites of the Data Study Addendum (2020).

Table 4.1: Amount of land currently in waste use in each North London Borough

Borough	Land in waste use (ha)	Proportion of total land in waste use
Barnet	12.31	18%
Camden	0.2	<1%
Enfield	42.45	62%
Hackney	0.8	1%
Haringey	8.17	12%
Islington	1	1.5%
Waltham Forest	3.62	5%
<b>Total</b>	<b>68.55</b>	<b>100%</b>

To reflect the feedback from the Draft Plan consultation, Spatial Principle B was changed from “Seek a network of waste sites across North London” to “Seek a geographical spread of waste sites across North London, consistent with the principles of sustainable development.”

In addition, when considering alternative options for taking areas forward, each of the options considers the proportion of land in each Borough. One of the options (Option 5) seeks specifically to address concerns that there is an over-concentration of sites in Enfield by limiting the proposed areas for new waste facilities in Enfield to one. While seeking a better geographical spread of waste facilities, the Boroughs acknowledge that the stock of suitable industrial land is not evenly spread across North London, and deliverability of waste uses will be better in some areas than others.

*C. Changes to policy wording*

In order to ensure any proposals for sites are subject to rigorous and reasonable assessment in line with aims of the plan, changes were made to Policy 6 and supporting text to strengthen the policy by:

- requiring no significant adverse impact on the Lee Valley Regional Park
- requiring no significant adverse impact on heritage assets and their settings, and undesignated remains within Archaeological Priority Areas
- requiring consideration to be given to the provision and/or enhancement of wharf facilities
- requiring no significant adverse impact on water quality
- requiring no adverse impact on flood risk
- requiring that cumulative impact is considered
- defining amenity

*D. Consider alternative options for taking sites and areas forward*

Options for choosing Preferred Locations for new waste facilities are considered in Section 5 below.

## **5. Options for taking forward sites and areas in the Proposed Submission Plan**

After taking into account a number of factors including national and regional policy, the aims of the NLWP and consultation responses on the Draft Plan, the North London Boroughs developed a range of reasonable options for taking forward a reduced number of sites and areas in the proposed Submission version of the plan. The options included:

Base Option: as per Draft Plan

1. Band B areas only
2. Band B areas and larger areas
3. Existing designated industrial areas only (Strategic Industrial Location (SIL) and Locally Significant Industrial Sites (LSIS))
4. Band B, SIL and LSIS areas
5. Band B, SIL and LSIS areas with a cap of Band B only in Enfield

An analysis of each of these options was undertaken and is set out below. The analysis takes the form of a RAG assessment with criteria which takes account of representations on the Draft NLWP consultation. These are set out below:

- A. In line with Spatial Principle B: Seek a better geographical spread of waste facilities
- B. A focus on high-performing (Band B) land and/or designated industrial land
- C. Reducing the amount of land identified as suitable for new waste facilities
- D. Providing flexibility and land which can accommodate a range of facilities

### Evaluation Key

	Does not meet criteria
	Partially meets criteria
	Meets criteria

## Base Option: Sites and Areas proposed in the Draft NLWP (July 2015)

There are 31 sites and areas included in the Draft Plan with a combined total of 316.32 hectares. The sites and areas are as follows:

- Geron Way/Edgware Road, Barnet (3.28ha)
- Bilton Way, Enfield (0.4ha)
- Eagle Wharf Road, Hackney (0.52ha)
- Meadow Works, Barnet (0.5ha)
- Oakleigh Road, Barnet (3.1ha)
- Brunswick Industrial Park, Barnet (3.9ha)
- Mill Hill Industrial Estate, Barnet (0.9ha)
- Connaught Business Centre, Barnet (0.9ha)
- BT Depot and Jewsons , Barnet (0.7ha)
- Freezywater, Enfield (10.7ha)
- Brimsdown, Enfield (134.4ha)
- Redburn Trading Estate, Enfield (4.0ha)
- Meridian Business Park, Enfield (14.9ha)
- Montagu Industrial Area (North) , Enfield (9.5ha)
- Eley's Estate, Enfield (26.1ha)
- Commercial Road and North Middlesex Estate, Enfield (10.0ha)
- Theydon Road, Hackney (4.3ha)
- Millfields LSIS, Hackney (2.1ha)
- Hackney Downs, Hackney (0.55ha)
- Mare Street , Hackney (0.46ha)
- Oak Wharf, Hackney (1.5ha)
- Brantwood Road, Haringey (16.9ha)
- Willoughby Lane , Haringey (1.1ha)
- North East Tottenham , Haringey (15.4ha)
- Friern Barnet Sewage Works, Pinkham Way, Haringey (5.95ha)
- Wood Green (LEA 19), Coburg Road, Haringey (11.5ha)
- Argall Avenue, Waltham Forest (27.9ha)
- Auckland Road, Waltham Forest (1.26ha)
- Palace Close SIL, LLDC/ Hackney (0.9 ha)
- Bartrip Street LSIS, LLDC/ Hackney (0.6 ha)
- Bus Depot, Temple Mill Lane, LLDC/Waltham Forest (2.1 ha)

### Planning analysis of Base Option: Sites and Areas proposed in the Draft NLWP (July 2015)

	Pro	Con	
D	Provides land which can accommodate a range of facility types. Would require 2% of total identified land to come forward for new waste management facilities to meet need (6.4ha).	Enfield areas contribute 66% (210ha) of the total land proposed for new waste facilities in addition to 62% of land in existing waste use.	A
		Includes land outside existing industrial	B

		locations which could compromise future Borough growth priorities.	
		Does not address some of the objections at consultation related to reducing land identified as suitable (total 316ha)	C

### Option 1: 'Band B' sites

This option takes forward the six areas which performed best against the selection criteria and were assessed to be “suitable for waste uses following appropriate mitigation”. The areas in Option 1 have a combined total of 193.04 hectares and are listed below:

- Oakleigh Road, Barnet (0.99ha)
- Freezywater, Enfield (10.7ha)
- Brimsdown, Enfield (134.4ha)
- Meridian Business Park, Enfield (14.9ha)
- Eley’s Estate, Enfield (26.1ha)
- Friern Barnet Sewage Works, Pinkham Way, Haringey (5.95ha)

#### Planning analysis of Option 1

	Pro	Con	
B	Takes forward the best performing areas in line with the Plan’s assessment criteria	Enfield areas contribute 96% (186ha) of the total land proposed for new waste facilities in addition to 62% of land in existing waste use.	A
D	Provides land which can accommodate a range of facility types Would require just over 3% of total identified land to come forward for new waste management facilities to meet need (6.4ha).	Land identified (193ha) is reduced from the Base Option (316ha)	C

### Option 2: Band B areas and larger<sup>1</sup> Band C areas

This option combines the best performing areas with the larger of the Band C sites/areas. The 12 areas in Option 2 have a combined total of 283.17 hectares and are listed below:

- Oakleigh Road, Barnet (0.99ha)
- Freezywater, Enfield (10.7ha)
- Brimsdown, Enfield (134.4ha)
- Meridian Business Park, Enfield (14.9ha)
- Eley’s Estate, Enfield (26.1ha)

<sup>1</sup> In this case, “larger” Areas were defined as those of 9.5ha and above. This size was chosen because the next Area in Schedule 2 was 4.3ha which was not considered to be “large”.

- Montagu Industrial Area, Enfield (9.5ha)
- Commercial Road and North Middlesex Estate, Enfield (10ha)
- Brantwood Road, Haringey (16.9ha)
- North East Tottenham, Haringey (15.32ha)
- Wood Green LEA, Haringey (11.5ha)
- Friern Barnet Sewage Works, Pinkham Way, Haringey (5.95ha)
- Argall Avenue, Waltham Forest (26.91ha)

Planning analysis of Option 2: Band B areas and larger Band C areas

	Pro	Con	
D	Provides land which can accommodate a range of facility types Would require just over 2% of total identified land to come forward for new waste management facilities to meet need (6.4ha).	Enfield areas contribute 73% (205.6ha) of the total land proposed for new waste facilities in addition to 62% of land in existing waste use.	A
		Band C areas are not the high-performing category. They are possibly suitable for waste uses although there are significant mitigation issues to address	B
		Land identified (283ha) is not significantly reduced from the Base Option (316ha)	C

**Option 3: Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS)**

This option includes 19 areas and focuses on designated industrial land. Areas designated as Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) make up five of the six Band B areas (the other is Friern Barnet Sewage Works, Pinkham Way). The remaining SIL/LSIS areas are in Band C. SIL/LSIS are already considered suitable for waste uses in principle. The areas in Option 3 have a combined total of 280.33 hectares and are listed below:

- Oakleigh Road, Barnet (0.99ha)
- Brunswick Industrial Park, Barnet (3.9ha)
- Mill Hill Industrial Estate, Barnet (0.9 ha)
- Connaught Business Centre, Barnet (0.9 ha)
- Freezywater, Enfield (10.7ha)
- Brimsdown, Enfield (134.4ha)
- Bilton Way, Enfield (0.4ha)
- Redburn Trading Estate, Enfield (4ha)
- Meridian Business Park, Enfield (14.9ha)
- Montagu Industrial Area, Enfield (9.5ha)
- Eley's Estate, Enfield (26.1ha)
- Commercial Road and North Middlesex Estate, Enfield (10ha)

- Millfields LSIS, Hackney (1.48 ha)
- Brantwood Road, Haringey (16.9ha)
- North East Tottenham, Haringey (15.32ha)
- Argall Avenue, Waltham Forest (26.91ha)
- Palace Close SIL, LLDC/ Hackney (0.33 ha)
- Bartrip Street LSIS, LLDC/ Hackney (0.6 ha)
- Temple Mill Lane, LLDC/Waltham Forest (2.1 ha)

Planning analysis of Option 3: Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS)

	Pro	Con	
D	Provides land which can accommodate a range of facility types Would require just over 2% of total identified land to come forward for new waste management facilities to meet need (6.4ha).	Enfield areas contribute 75% (210ha) of the total land proposed for new waste facilities in addition to 62% of land in existing waste use.	A
		Excludes a higher performing site at Friern Barnet Sewage Works / Pinkham Way (Haringey) and the only land submitted by a landowner	B
		Land identified (280ha) is not significantly reduced from the Base Option (316ha)	C

#### Option 4: Band B, SIL and LSIS areas

This option combines the best performing areas in Option 1 and the existing designated industrial locations in Option 3. The 20 areas in Option 4 have a combined total of 286.28 hectares and are listed below:

- Oakleigh Road, Barnet (0.99ha)
- Brunswick Industrial Park, Barnet (3.9ha)
- Mill Hill Industrial Estate, Barnet (0.9 ha)
- Connaught Business Centre, Barnet (0.9 ha)
- Freezywater, Enfield (10.7ha)
- Brimsdown, Enfield (134.4ha)
- Bilton Way, Enfield (0.4ha)
- Redburn Trading Estate, Enfield (4ha)
- Meridian Business Park, Enfield (14.9ha)
- Montagu Industrial Area, Enfield (9.5ha)
- Eley's Estate, Enfield (26.1ha)
- Commercial Road and North Middlesex Estate, Enfield (10ha)
- Millfields LSIS, Hackney (1.48 ha)
- Brantwood Road, Haringey (16.9ha)

- Friern Barnet Sewage Works, Pinkham Way, Haringey (5.95ha)
- North East Tottenham, Haringey (15.32ha)
- Argall Avenue, Waltham Forest (26.91ha)
- Palace Close SIL, LLDC/ Hackney (0.33 ha)
- Bartrip Street LSIS, LLDC/ Hackney (0.6 ha)
- Temple Mill Lane, LLDC/Waltham Forest (2.1 ha)

Planning analysis of Option 4: Band B, SIL and LSIS areas

	Pro	Con	
B	Takes forward the best performing areas in line with the Plan's assessment criteria	Enfield areas contribute 73% (210ha) of the total land proposed for new waste facilities in addition to 62% of land in existing waste use.	A
D	Provides land which can accommodate a range of facility types Would require just over 2% of total identified land to come forward for new waste management facilities to meet need (6.4ha).	Land identified (286ha) is not significantly reduced from the Base Option (316ha)	C

**Option 5: Band B, SIL and LSIS areas with a cap on land in Enfield**

This option seeks to reduce the high contribution of land made by Enfield to create a better geographical spread of waste sites across North London. It does so by prioritising the best performing (Band B) locations in Enfield and removing the four Band C areas. The 13 areas in Option 4 have a combined total of 102.38 hectares and are listed below:

- Oakleigh Road, Barnet (0.99ha)
- Brunswick Industrial Park, Barnet (3.9ha)
- Mill Hill Industrial Estate, Barnet (0.9 ha)
- Connaught Business Centre, Barnet (0.9 ha)
- Eley's Estate, Enfield (26.1ha)
- Millfields LSIS, Hackney (1.48 ha)
- Brantwood Road, Haringey (16.9ha)
- North East Tottenham, Haringey (15.32ha)
- Friern Barnet Sewage Works, Pinkham Way, Haringey (5.95ha)
- Argall Avenue, Waltham Forest (26.91ha)
- Bartrip Street LSIS, LLDC/ Hackney (0.6 ha)
- Palace Close SIL, LLDC/ Hackney (0.33 ha)
- Temple Mill Lane, LLDC/Waltham Forest (2.1 ha)

Planning analysis of Option 5: Band B, SIL and LSIS areas with a cap on land in Enfield

	Pro	Con	
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B	Takes forward the best performing areas in line with the Plan's assessment criteria	Enfield areas contribute 25% (26.1ha) of the total land proposed for new waste facilities in addition to 62% of land in existing waste use.	A
C	Land identified (102ha) is significantly reduced from the Base Option (316ha)		
D	Provides land which can accommodate a range of facility types Would require just over 6% of total identified land to come forward for new waste management facilities to meet need (6.4ha).		

## 6. Decision on Taking Forward Sites and Areas

As a result of the Draft Plan consultation, it was decided by the Boroughs that there were sufficient reasons to reassess the approach to sites and areas and to focus on existing, well-established industrial land, and sites which performed well against the assessment criteria. An opportunity was also identified to reduce the number of areas identified as suitable for waste use, while maintaining flexibility and seeking wider geographical spread of land.

In seeking a better geographical spread of sites, the Boroughs have taken account of the locations of existing waste facilities and the contribution of each Borough to existing capacity in North London (see Table 4.1 above). Table 6.1 below summarises the amount of land in each Borough for each of the options to identify land for new waste facilities. It is clear from the table that Option 5 is best for a geographical spread of waste facilities. Table 6.2 shows

Table 6.1: Proportion of land in each Borough for Options 1-5

Borough	Draft Plan	Option 1	Option 2	Option 3	Option 4	Option 5
Barnet	13.28ha 4%	0.99ha 0.5%	0.99ha 0.3%	6.69ha 2%	6.69ha 2%	6.69ha 6.5%
Camden	0	0	0	0	0	0
Enfield	210ha 66%	186.1ha 96%	205.6ha 73%	210ha 75%	210ha 73%	26.1ha 25%
Hackney	10.93ha 3%	0	0	2.41ha 1%	2.41ha 1%	2.41ha 2%
Haringey	50.85ha 16%	5.95ha 3%	49.67ha 17%	32.22ha 11%	38.17ha 13%	38.17ha 37%
Islington	0	0	0	0	0	0
Waltham Forest	31.26ha 10%	0	26.91ha 9.5%	29.01ha 10%	29.01ha 10%	29.01ha 28%
Total (hectares)	316.32	193.04	283.17	280.9	286.85	102.38



**Base Option: As per Draft Plan**

This option was not considered suitable as it did not meet all the criteria in the revised approach to sites/areas. While this option meets the strategy for a wider geographical spread, it includes land not designated industrial land or assessed as Band B, and it is the highest land-take of all the options.

**Option 1: Take forward 'Band B' sites only**

All the land in this option is high-performing Band B sites/areas and the land-take is considerably reduced from the Base Option (193ha to meet the required 6.4ha). However, the majority of land identified is in Enfield (96%) which does not meet the strategy for a wider geographical spread of sites and areas. Option 1 was therefore not considered a reasonable option to take forward.

**Option 2: Take forward Band B areas and larger Band C areas**

The amount of land identified in this option is reduced from the Base Option (283ha). However, it excluded smaller sites/areas which performed just as well against the assessment criteria. Excluding smaller sites/areas also does not meet the aim for flexibility. In addition, the majority of land identified is in Enfield (73%) which does not meet the strategy for a wider geographical spread of sites and areas. Option 2 was therefore not considered a reasonable option to take forward.

**Option 3: Existing designated industrial areas only (SIL and LSIS)**

All the land in this option is designated industrial land and the land-take is reduced from the Base Option (280ha). However, it excluded a higher performing 'Band B' site which was also the only land submitted by a landowner. In addition, the majority of land identified is in Enfield (75%) which does not meet the strategy for a wider geographical spread of sites and areas. Option 3 was therefore not considered a reasonable option to take forward.

**Option 4: Band B, SIL and LSIS areas**

All the land in this option is either designated industrial land or a high-performing Band B area and the land-take is reduced from the Base Option (286ha). However, it does not meet our own assessment criteria which identifies more suitable and less suitable SIL/LSIS areas. Some SIL/LSIS areas in this option are in the less suitable category. In addition, there is still a high concentration of land in Enfield (73%) and this undermines the aim for a wider geographical spread of sites and areas across North London. Option 4 was therefore not considered a reasonable option to take forward.

**Option 5: Band B, SIL and LSIS areas with a cap on land in Enfield**

All the land is either designated industrial land or a high-performing Band B site/area and the land-take is reduced from the Base Option (102ha). In addition it helps to provide a better geographical spread by capping the number of areas identified in Enfield. However, there is still a risk that all new waste facilities could come forward in Enfield. Facilities could also come forward on other industrial land and would need to be considered against the Windfall Sites policy. In addition, the opportunity for land to come forward for new waste facilities is reduced because much less land has been identified in this option.

Notwithstanding this, Option 5 is considered the most reasonable option to take forward into the Proposed Submission Plan.

### **Additional recommendations arising from public hearings in November 2019**

Option 5 has been taken forward into the Proposed Submission Plan. With no individual sites identified, the NLWP takes an area-based approach to waste planning. 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.

However, the Plan does not provide a robust rationale that clearly demonstrates why all of the proposed new waste areas are necessary. Further explanation should be provided in the supporting text to make clear that while 102ha is a large area when compared to the need for 6.4ha, this land is currently occupied by existing industrial uses, and there is strong competition for industrial land in North London. The Plan should make clear that Boroughs will rely on business churn for release of individual sites which could come forward for waste uses and that analysis of business churn and vacancy rates is included in the Sites and Areas Report.

It is recommended that the Areas in Schedules 2 and 3 are designated as 'Priority Areas for new waste management facilities' in order to improve clarity on the sequential approach to seeking waste sites in North London and ensure developers are directed towards these locations before considering others.

It is also recommended that delivery of Spatial Principle B, to create a better geographical spread of waste facilities, is strengthened. In particular to address concerns that there is an over-concentration of waste facilities in Enfield. This could be achieved through an additional clause in Policy 2 and Policy 3 requiring developers to seek sites outside Enfield, and demonstrate that no sites are available or suitable before considering sites within Enfield.

## Appendix A: Sites and Areas not being taken forward

The sites and areas included in the Draft Plan which are not being taken forward are:

Site/Area	Reason for exclusion
Geron Way	Application granted for new waste facility, Schedule 1 to be updated once operational
Eagle Wharf Road, Hackney (0.52ha)	Not designated as SIL or LSIS
Meadow Works, Barnet (0.5ha)	Not designated as SIL or LSIS
BT Depot and Jewsons , Barnet (0.7ha)	Not designated as SIL or LSIS
Bilton Way, Enfield (0.4ha)	Limit on Enfield sites for better geographical spread
Montagu Industrial Area (North) , Enfield (9.5ha)	Limit on Enfield sites for better geographical spread
Redburn Trading Estate, Enfield (4.0ha)	Limit on Enfield sites for better geographical spread
Commercial Road and North Middlesex Estate, Enfield (10.0ha)	Limit on Enfield sites for better geographical spread
Theydon Road, Hackney (4.3ha)	Not designated as SIL or LSIS
Hackney Downs, Hackney (0.55ha)	Not designated as SIL or LSIS
Oak Wharf, Hackney (1.5ha)	Not designated as SIL or LSIS
Mare Street, Hackney (0.46 ha)	Not suitable based on highways assessment
Wood Green (LEA 19), Coburg Road, Haringey (11.5ha)	Plan for alternative use, not designated as SIL or LSIS
Willoughby Lane , Haringey (1.1ha)	Not designated as SIL or LSIS
Auckland Road, Waltham Forest (1.26ha)	Identified as redevelopment site in the Olympic Fringe AAP