North London Waste Plan

Complete Schedule of Proposed Modifications

March 2021

North London Waste Plan: Proposed Modifications (March 2021)

Main and Additional Modifications to the Proposed Submission North London Waste Plan combining all modifications made after the submission of the Plan on 8th August 2019.

- Main Modifications (MM) which have a reference number and relate to issues of soundness
- Additional Modifications (AM) which are minor in nature and which provide consistency, clarity and/or correct errors
- New text **in bold**
- Deleted text ~~strikethrough~~
- Where paragraphs have been moved, this is indicated in both their original place (greyed out) and in their new location with any subsequent changes

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td>AM</td><td>All</td><td>Changes to Table and Figure numbering
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Reference	Section	Further modification				Justification
			North London and elsewhere (2016)			
		Table 5: Recycling and Recovery Targets with 2016 Baseline	Table 3: Recycling and Recovery Targets with 2016 Baseline	Figure 4: Waste Hierarchy	Figure 4: Waste Hierarchy	
		New Table: Options considered for forecasting North London's waste arisings	Table 4: Options considered for forecasting North London's waste arisings	Figure 5: Existing Waste Sites	Figure 5: Existing Waste Sites	
		Table 8: Amount of waste to be managed within North London 2018-2035 Table 9: Projected exports from North London to landfill 2018-2035	Table 5: Projected arisings and management of North London's waste 2020-2035	Figure 6: Key diagram	Figure 6: Key diagram	
		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 6: Existing Annual Capacity at Licensed Operational Waste Management Facilities at the Start of the Plan Period	Figure 7: Current Re-use and Recycling Centres (RRC) in North London	Figure 7: Current Re-use and Recycling Centres (RRC) in North London	
		Table 6: Capacity gaps throughout the Plan period–chosen option	Table 7: Capacity gaps throughout the Plan period (tonnes)	New Figure: Heat and Energy Networks in North London	Figure 8: Heat and Energy Networks in North London	

Reference	Section	Further modification				Justification
		New Table: Reference Capacities for Land Take for New Waste Facilities	Table 8: Reference Capacities for Land Take for New Waste Facilities	Figure 8: Waste arisings in North London 2016	Figure 9: Waste arisings in North London 2016	
		Table 7: Land take requirements for meeting net self-sufficiency for LACW, C&I and C&D (requirements for London Plant apportionment in brackets)	Table 9: Indicative land take requirements for meeting the capacity gap	Figure 9: Distributions of Waste Exports from North London	Figure 10: Destinations of Waste Exports from North London	
		Table 10: Sites and Areas Assessment Criteria	Table 10: Sites and Areas Assessment Criteria	Figure 10: Location of proposed new areas	Figure 11: Priority Areas for new waste management facilities	
		Table 11: Schedule 2 Areas suitable for waste management	Table 11: Schedule 2 Priority Areas for waste management			
		Table 12: Schedule 3 Areas identified in LLDC Local Plan	Table 12: Schedule 3 Priority Areas identified in LLDC Local Plan			
		Table 13: Key to Waste Management Facility Type	Table 13: Key to Waste Management Facility Type			
		Table 14: NLWP Monitoring Indicators	Table 14: NLWP Monitoring Indicators			
		Table 15: Roles and responsibilities	Table 15: Roles and responsibilities			

<table>
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<tr><td>involved in implementing the Plan</td><td>involved in implementing the Plan</td><td></td><td></td></tr>
<tr><td>Table 16: How the NLWP policies will be implemented</td><td>Table 16: How the NLWP policies will be implemented</td><td></td><td></td></tr>
<tr><td>Table 17: Schedule 1: Existing safeguarded waste sites in North London</td><td>Schedule 1: Existing safeguarded waste sites in North London</td><td></td><td></td></tr>
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</td><td></td></tr>
<tr><td>AM</td><td>2.3 [Moved here to before 1.1]</td><td>~~The~~ North London ~~Boroughs~~ covers a large swathe of London from the inner city into the Green Belt of outer London. The geographical extent takes in both the inner London Boroughs of Camden, Hackney and Islington, and the outer London Boroughs of Barnet, Enfield, Haringey and Waltham Forest (see Figure 1 ~~4~~). The land within the North London Boroughs spans an area of 293 square kilometres. ~~The geographical characteristics of North London are a key element in both the Spatial Framework (see section 4) and the sites/areas assessment criteria (see section 8).~~</td><td>Contributes to consistency, clarity and/or correct errors</td></tr>
<tr><td>MM1</td><td>1.3 and 4.1 (part)</td><td>The Aim and Strategic Objectives:

[…]
The Spatial Principles ~~Framework~~: The spatial principles flow from the ~~Plan's~~ 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.</td><td>These modifications are required to ensure clarity about the purpose of the Spatial Principles</td></tr>
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Reference	Section	Further modification	Justification
AM	1.3	[…] The Policies: These are **strategic** policies through which the aims and objectives, waste management strategy and Spatial **Principles** ~~Framework~~ will be delivered. The policies provide the waste planning framework against which applications for waste development will be assessed across the Plan area.	Contributes to consistency, clarity and/or correct errors
AM	1.7	Once adopted, the NLWP will form part of the 'Development Plan' for each of the North London Boroughs which comprises the London Plan[1] and borough Local Plans (see Figure 2). The NLWP must be in general conformity with the London Plan**, which sets the strategic framework for the NLWP,** and consistent with other documents in borough Local Plans. The NLWP should be read alongside other relevant policies within the wider Development Plan. The Mayor published a draft London Plan for consultation in December 2017. The Examination in public ~~is expected to begin in January~~ **took place in early** 2019 with ~~adoption~~ **publication of a new London Plan in March 2021** ~~scheduled for~~ ~~2020~~. ~~The London Plan sets the strategic framework for the NLWP.~~ Footnote: ~~At time of writing this is The London Plan March 2016~~	Contributes to consistency, clarity and/or correct errors
AM	1.11	The North London Waste Authority**'s** (NLWA) **and the seven constituent boroughs have** ~~has~~ produced the Joint Municipal Waste Management Strategy (JMWMS) (2009). The NLWA, as the Waste Disposal Authority for the NLWP area, is a key stakeholder. The NLWA is responsible for managing the **household** waste collected by the North London boroughs, ~~in particular household waste but also~~ **and also for the household** waste deposited at Reuse and Recycling Centres and some waste that the boroughs collect from local businesses; collectively this is known as Local Authority Collected Waste (LACW). The NLWP is required to ensure there is adequate provision for the disposal and recovery of this waste stream.	Contributes to consistency, clarity and/or correct errors

Reference	Section	Further modification	Justification
Chapter 2 [Paragraphs moved to Chapters 1, 3 and 4]			
	2.1 and 2.2	[Moved to before 3.1]	
	2.3	[Moved to before 1.1]	
	Figure 4	[Move to Chapter 4, combine with key diagram]	
AM	2.4	[First sentence moved to Chapter 4] ~~Recent statistics show that the population has risen from 1.6 million in 2002 to an estimated 2.0 million in 2017 and that the population continues to grow at a rate above the national average. This population growth will also increase the amount of waste North London will need to manage in the future, even though the amount of waste generated per person may not increase (see section 6).~~	Contributes to consistency, clarity and/or correct errors
AM	2.5	~~The highest density is in the inner boroughs of Islington (the most densely populated local authority in the UK according to the 2011 Census), Hackney and Camden, closely followed by Haringey. Waltham Forest, Barnet and Enfield are less densely populated, however these Boroughs are still substantially more densely populated than the rest of the country. Density of population and the built environment has an influence on the amount of waste generated but also on competition for land and the availability of sites suitable for new waste facilities (see section 7).~~	Contributes to consistency, clarity and/or correct errors
	2.6	[Moved to Chapter 4]	
AM	2.7	~~There are varying levels of life expectancy across North London. The outer boroughs of Barnet and Enfield report life expectancies higher than the national average, however significant inequalities exist within the boroughs. In contrast, the other Boroughs report male life expectancy lower than the average for England, while the same is true of females in Islington and Waltham Forest.~~ [Final sentence moved to Chapter 4]	Contributes to consistency, clarity and/or correct errors
AM	2.8	~~The average gross weekly earnings within each of the North London Boroughs is higher than the average for England. All of the Boroughs have a higher proportion of their working population~~	Contributes to

Reference	Section	Further modification	Justification
		~~employed than the national average. This is mirrored by the high cost of living in all Boroughs. Four Boroughs (Hackney, Haringey, Islington and Waltham Forest) contain wards amongst the 20 most deprived areas in England pointing to varying degrees of polarisation. All boroughs contain varying levels of deprivation within them.~~ [Moved to Chapter 4: Maximising economic benefits by utilising waste as a resource is an objective of this plan. There are opportunities for job creation through the development of new waste facilities at both the construction and end user stages. New technologies can also help to create 'green collar' jobs in new waste management facilities as well as in sectors that receive recycled or reprocessed material, turning it into new products, thereby creating wealth from waste.] ~~Economic growth in North London is predicted to result in greater amounts of waste being generated. This is due to more people in jobs, although the amount of waste created per person is expected to stay the same.~~	consistency, clarity and/or correct errors
	2.9-2.16	[Moved to Chapter 4]	
AM	2.17	~~The NLWP includes strategies and policies to protect environmental assets and amenity.~~	Contributes to consistency, clarity and/or correct errors
	2.18-2.21	[Moved to Chapter 4]	
AM	2.22	~~Opportunities for using sustainable modes of transport are a key element of the Spatial Framework~~.	Contributes to consistency, clarity and/or correct errors
	2.23-2.25	[Moved to Chapter 4]	

Reference	Section	Further modification	Justification
AM	2.26	~~Some boroughs are beginning to review their Green Belt boundaries as a result of the review of Local Plans.~~	Contributes to consistency, clarity and/or correct errors
	2.27	[Moved to Chapter 4]	
AM	2.28-2.31	[Summarised into 2.27] ~~2.28 All Boroughs have lower CO_2 emissions per capita than the national average, with the exception of Camden where levels are elevated by the concentration of commercial and other non-domestic activities. However all Boroughs have significantly lower per capita CO_2 emissions from road transport when compared to the national average. This is particularly apparent in Camden, Hackney, Haringey, Islington and Waltham Forest. Per capita CO_2 emissions from the domestic sector are below the national average.~~ ~~2.29 The NLWP seeks to reduce the reliance on disposal to landfill sites outside London as this contributes to CO_2 emissions from transport. While it is recognised that waste management facilities will continue to generate CO_2 emissions, new waste facilities generating energy need to meet the Mayor's Carbon Intensity Floor. The priority of the NLWP will be to implement policies and direct new development to sites which deliver a better overall environmental outcome.~~ ~~2.30 The NLWP site and area assessments take into account those parts of all Boroughs that are under threat from surface water (and potentially sewer) flooding because of the extensive urbanised areas.~~ ~~2.31 The site and area assessments also take into account the greater occurrence of urban flood events over the last sixty years and the risk that climate change will lead to a greater threat from~~	Contributes to consistency, clarity and/or correct errors

Reference	Section	Further modification	Justification
		~~flooding in the future. On the east side of the area a number of tributaries flow into the River Lee while parts of Barnet drain into the River Brent to the west.~~	
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 be measured by the amount (tonnes) managed for each waste stream against the projected waste arisings in Table 8.**	These modifications are required to ensure the wording in the NLWP is consistent with the London Plan (March 2021).
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	These modifications are required to ensure clarity about the purpose of the Strategic

Reference	Section	Further modification	Justification
		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.~~	Objectives and that the wording in the NLWP is consistent with the London Plan (March 2021).
AM	4	Spatial **Principles** ~~Framework~~	Contributes to consistency, clarity and/or correct errors
AM	2.15 [Moved to beginning of Chapter 4. Spatial Principles]	**Context: Land Use in North London** Historically much of the employment land in North London has been in industrial use. Inevitably the restructuring from an industrial-based to a service based economy has affected land use priorities, creating a situation where the type of employment land available has changed, particularly in the inner boroughs where offices predominate. Such areas are now under pressure to help deliver high housing and employment targets. The previous use of these areas raises the risk of contamination and the need for remedial measures regardless of how the land will be used in the future.	Contributes to consistency, clarity and/or correct errors

Reference	Section	Further modification	Justification
AM	2.5 [Moved here after 2.15]	**Across North London as a whole the predominant land use is housing.** While the outer Boroughs are characterised by traditional detached, semi-detached and terraced housing, overall across the Plan area, there is a higher proportion of flats and similar multi-tenant properties. This is particularly the case in the inner Boroughs which, consequently, have fewer gardens (and green waste) than the outer Boroughs. The differing ability of types of housing stock to incorporate waste collection infrastructure (for example recycling bins) impacts on recycling rates in North London (see section 6).	Contributes to consistency, clarity and/or correct errors
AM	2.23 [Moved here after 2.5]	~~Across North London as a whole the predominant land use is housing.~~ There are also concentrated areas of commercial activity and town centres. Parts of Camden, Hackney and Islington fall into the Central Activities Zone which covers London's geographic, economic, administrative, and cultural core spanning ten boroughs in total. The Upper Lee Valley on the east of the NLWP area includes a concentrated area of industrial activity. Each borough contains areas of industrial or employment land that are designated for this purpose. The London Plan designates Strategic Industrial Locations (SILs) and provides the strategic direction for the identification of Locally Significant Industrial Sites (LSISs) and other industrial/employment designations in Local Plans.	Contributes to consistency, clarity and/or correct errors
AM	2.24 [Moved here after 2.23]	**North London is one of the most densely populated areas in the UK.** There are a number of drivers for change in land use in **North** London, in particular the need to boost housing numbers and make best and most efficient use of land around public transport modes. These pressures are likely to increase as a result of planned investment such as Crossrail 2, Stratford to Angel Road (STAR) Scheme and four-tracking on the West Anglia Mainline.	Contributes to consistency, clarity and/or correct errors
AM	2.7 (part) 2.8 (part) [Moved here after 2.24]	**The Boroughs also seek to improve the health of residents and tackle deprivation.** Impact on human health has been a key consideration in the development of the NLWP and is discussed in more detail in the Sustainability Appraisal (SA) which supports the NLWP. Maximising economic benefits by utilising waste as a resource is an objective of this plan. There are opportunities for job creation through the development of new waste facilities at both the construction and end	Contributes to consistency, clarity and/or correct errors

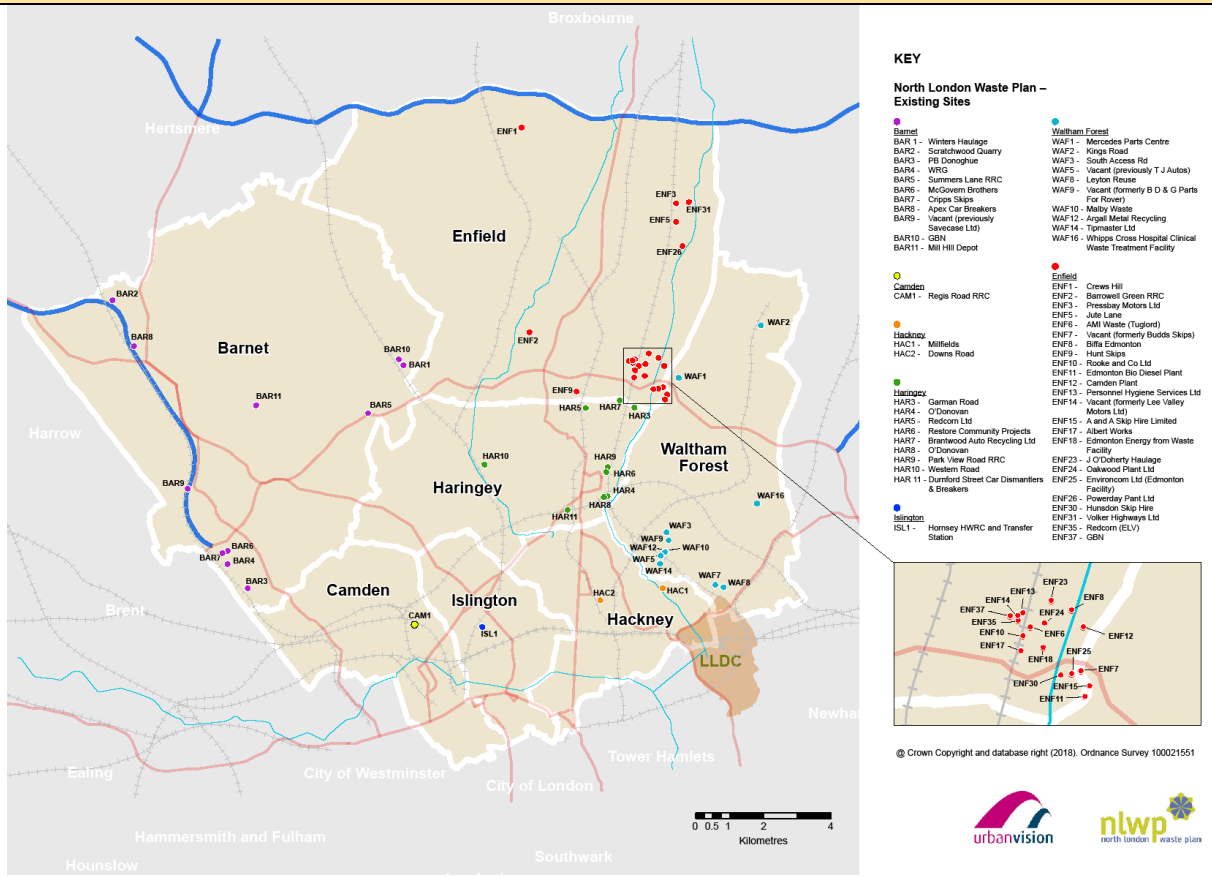
Reference	Section	Further modification	Justification
		user stages. New technologies can also help to create 'green collar'[2] jobs in new waste management facilities as well as in sectors that receive recycled or reprocessed material, turning it into new products, thereby creating wealth from waste.	
AM	2.25 [Moved here after 2.7 (part) and 2.8 (part)]	To deliver this change, the London Plan has identified Opportunity Areas and Housing Action Zones in parts of North London including parts of the Lee Valley and there may be future Opportunity Areas identified during the NLWP plan period. The Opportunity Areas overlap with land which contains existing facilities and also **some of** the **Priority Areas for new waste management facilities** ~~areas~~ identified in this Plan ~~for new waste facilities~~. **Therefore, it will be important for the Boroughs to monitor changing land uses through Monitoring Indicator IN4.** ~~alongside the opportunities for intensification and new homes, there will also be a need for Boroughs to consider existing waste operations and areas for new waste facilities, in light of NLWP Policies 1: and 2.~~	Contributes to consistency, clarity and/or correct errors
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.**	These modifications are required to clarify the Plan's approach to climate change.
AM	4.1 [part moved to 1.3]	The spatial framework flows from the Plan's objectives ~~and takes account of the spatial context outlined in section 2 and the strategic and policy context outlined in section 1, alongside the Plan's technical evidence base, and the views of stakeholders. Figure 6 below shows the relationship between the key elements that form the spatial framework.~~	Contributes to consistency, clarity and/or

[2] Jobs in environmental sectors

Reference	Section	Further modification	Justification
			correct errors
MM5	4.2	The Spatial **Principles** ~~Framework~~ flow from the Plan's Strategic Objectives and provide~~s~~ the strategic direction for the detailed policies of the NLWP and inform~~s~~ 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.	These modifications are required to ensure clarity about the purpose of the Spatial Principles
AM	4.4	The NLWP is underpinned by the following spatial principles: A. Make use of existing sites B. Seek a **better** geographical spread of waste sites across North London, consistent with the principles of sustainable development. C. Encourage co-location of facilities and complementary activities D. Provide opportunities for decentralised heat and energy networks E. Protect local amenity F. Support sustainable modes of transport	Contributes to consistency, clarity and/or correct errors
AM	4.5	NPPW requires Boroughs to consider the capacity of existing operational facilities in meeting identified need. Further to this~~, Policy 5.17 *Waste Capacity* of The~~ London Plan **policy SI8** requires boroughs, when preparing plans, to protect and facilitate the maximum use of existing waste sites.	Contributes to consistency, clarity and/or correct errors

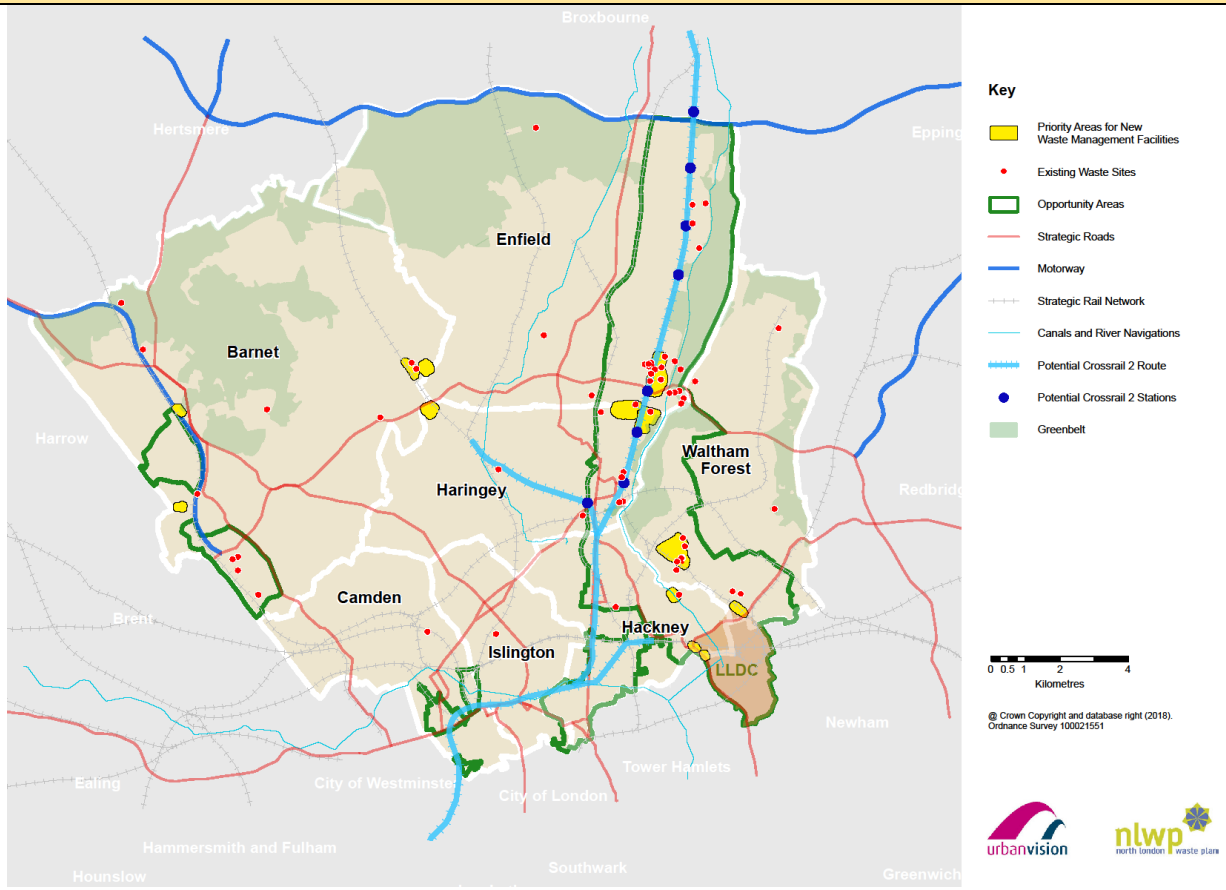
Reference	Section	Further modification	Justification
AM	4.8	Three existing sites are known to be planning capacity expansion or upgrades to existing facilities (see Section 8). Most other existing sites do not have any current plans to expand capacity or change their operations but the North London Boroughs support, in principle, the expansion or intensification of operations at existing facilities and this is reflected in Policy 1. Further guidance for industrial intensification is set out in draft New London Plan Policies E4-E7.	Contributes to consistency, clarity and/or correct errors
AM	4.9	B Seek a **better** geographical spread of waste sites across North London, consistent with the principles of sustainable development. The NLWP is underpinned by an aim to achieve net self-sufficiency for LACW, C&I, C&D waste streams, including hazardous waste. This will be achieved by identifying enough existing capacity and land in North London suitable for the development of new waste management facilities to manage the equivalent of 100% of this waste arising in North London. The objective is to reduce movements of waste, including waste exports, and increase the amount of waste managed in proximity to its source, in accordance with the principles of sustainable development. Waste is exported to a number of areas outside of North London, mainly in the south east and east of England ~~and Figure 12 shows the estimated reduction of waste exports over the plan period~~. The strategy for achieving net self-sufficiency is set out in the Provision for North London's Waste to 203**5**~~2~~ in section 7.	Contributes to consistency, clarity and/or correct errors
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. 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	These modifications are required to ensure the wording in the NLWP is

Reference	Section	Further modification	Justification
		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.	consistent with the London Plan (March 2021) and NPPF.
AM	Figure 5	[Update reference to: Redcorn **Ltd, Brantwood Road** ~~/ Brantwood Auto Recycling Ltd~~]	Correction
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, 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.**	This modification is required to provide context to Spatial Principle B.
AM	Figure 9: Existing Waste Sites	[Revised and moved here from Section 6]	Contributes to consistency, clarity and/or correct errors

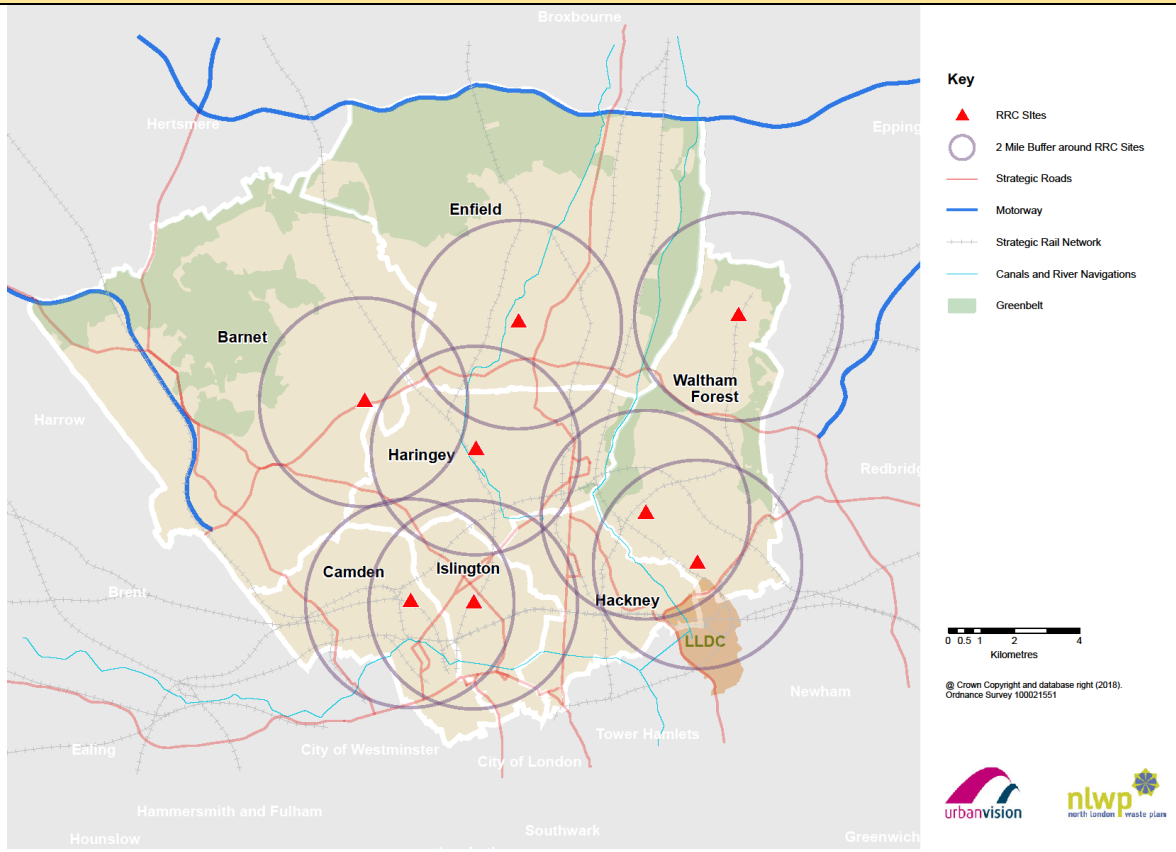
Reference	Section	Further modification	Justification
			
AM	4.11 [cont]	Any new waste development proposed in North London will be expected to be of a standard that is in keeping with and complements the existing and future planned development. By **delivering STRATEGIC OBJECTIVE 2 and** identifying suitable land across North London (Policy 2), the NLWP seeks to provide opportunities to manage waste as close to its source as possible, in line with the proximity principle. In promoting a geographic spread of facilities across the plan area consistent	Contributes to consistency, clarity and/or

Reference	Section	Further modification	Justification
		with the principles of sustainable development, the NLWP seeks to weigh the positive effects of co-location and economies of scale with the negative effects of excessive concentration of waste facilities in any one area. All North London Boroughs want to play their part in managing north London's waste and therefore support a~~n~~ **more** equitable geographical distribution across the seven Boroughs.	correct errors
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**	This modification is required to provide context to Spatial Principle B.

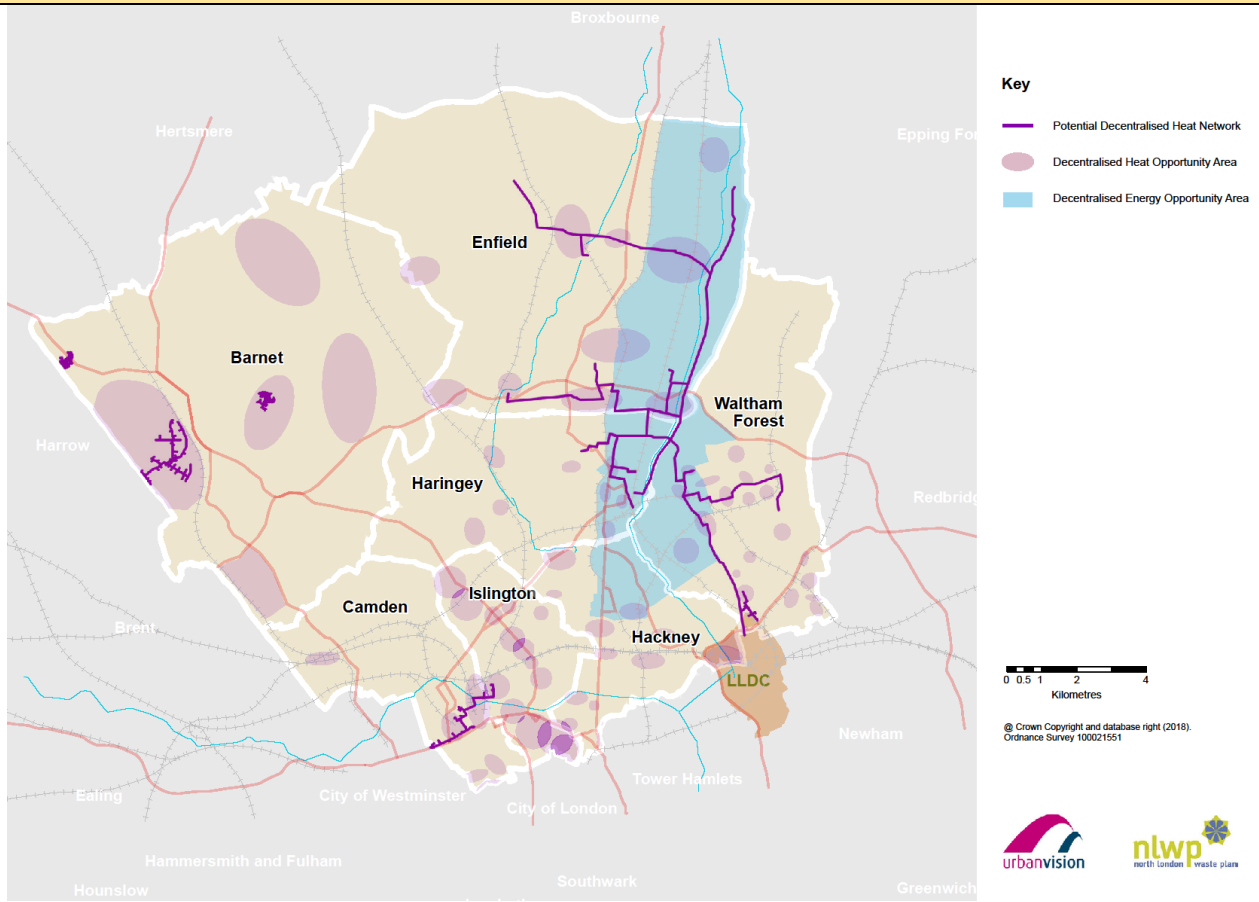
Reference	Section	Further modification	Justification
		suitable land in North London when assessed against the planning criteria (see Table 10) as well as ~~factors such as~~ the character of different areas, changing land uses and availability of suitable industrial land. **Policy 2 identifies these Priority Areas in Schedules 2 and 3. Outside of the Priority Areas,** ~~W~~**w**here demand arises, opportunities to improve the 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.	
AM	Key Diagram	[Combined with Figure 4: Main geographical and planning features of North London]	Contributes to consistency, clarity and/or correct errors

Reference	Section	Further modification	Justification
			
AM	4.16	There are also co-location opportunities related to other industrial activities synergistic with waste management, for example the manufacturing of products from recycled materials and the development of a more circular economy. Existing waste facilities are already employing this approach as exemplified by the industries developing around the Edmonton EcoPark (Enfield) and the Plan seeks to build on the momentum by supporting this approach as a key element of the	Contributes to consistency, clarity and/or

Reference	Section	Further modification	Justification
		Spatial **Principles** ~~framework~~ and identifying which areas have potential for co-location. **Co-location of industrial and non-industrial uses at Strategic Industrial Locations (SIL) is not supported, in line with draft New London Plan policy E5.**	correct errors
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.**	This modification is required to provide more explanation on the delivery of Spatial Principle C.
AM	Figure 7	[new format]	Contributes to consistency, clarity and/or correct errors

Reference	Section	Further modification	Justification
			
MM10	4.18	The NPPW recognises the benefits of co-location of waste facilities with end users of their energy outputs. The London Plan ~~supports the development of combined heat and power systems and provision of heat and power to surrounding consumers~~ **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-**	These modifications are required to ensure the

Reference	Section	Further modification	Justification
		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.	wording in the NLWP is consistent with the London Plan (March 2021).
AM	4.19	The ~~Key~~ **Heat and Energy Network** Diagram (Figure **~~8~~6**) shows where facilities could connect to a network ('decentralised heat opportunity area' and 'decentralised energy opportunity area'). There is already a relatively well-advanced plan for decentralised heat network in the Lee Valley and this offers the most promising and realistic possibility within the Plan area. The NLWP supports opportunities to develop combined heat and power networks on sites and areas, within the Lee Valley, south Barnet and elsewhere (see Figure 6), that not only have the ability to link in to the decentralised energy network but also have the potential for waste development with Combined Heat and Power. Policy 6 seeks to secure opportunities for the recovery of energy from waste where feasible.	Contributes to consistency, clarity and/or correct errors
AM	New Figure	**Figure 8: Heat and Energy Networks in North London**	Contributes to consistency, clarity and/or correct errors

Reference	Section	Further modification	Justification
			
	2.9-2.14	[Moved to E. Protecting Local Amenity before 4.20]	
	2,18, 2.16, 2.19-2.21	[Moved to beginning of F. Support sustainable modes of transport]	

Reference	Section	Further modification	Justification
AM	4.25	The NPPW and the London Plan require Boroughs to identify sites/areas with the potential to utilise modes of transport other than road transport. As Figure 6 shows, North London is well served by road, rail and waterway networks and waste is currently transported into, out of and around North London by both road and rail. But like many industry sectors, road is the main mode of transport for the movement of waste. There are potential opportunities for waste sites to better utilise sustainable modes of transport such as rail and waterways. Movement of waste via more sustainable transport methods is duly supported in line with ~~Objective~~ **STRATEGIC OBJECTIVE** 7, although this may not always be practicable, especially when costs associated with investment in wharfs and rail sidings and other infrastructure which may be necessary before waste can be moved along the canal or rail network may not be economically viable, especially for smaller facilities. North London currently has one rail linked waste site (at Hendon) supporting the requirements of the NLWA, however this site is due to be redeveloped as part of the Brent Cross Cricklewood regeneration project and the NLWA's need for this railhead has changed. **This is reflected in a new replacement waste transfer station (approved by Barnet Council in September 2018). A replacement rail based freight facility has also been approved as part of the Brent Cross Cricklewood regeneration scheme under planning permission 17/5761/EIA, which permits the transfer of aggregate and non-putrescible construction waste by rail. This rail transfer facility was brought into operation in March 2020.** ~~There is a planning application for replacement rail based depot with a different function under consideration.~~ There is also a wharf on the Lee Navigation which potentially could provide future opportunities for transportation by water at Edmonton EcoPark.	Contributes to consistency, clarity and/or correct errors
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 the use of low emission vehicles.** Access to transport networks including sustainable transport modes	These modifications are required to provide context to

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td></td><td></td><td>was considered when assessing the suitability of new sites and areas. Rail and water <s>road</s> transport is particularly desirable when waste is travelling long distances. Policy 5 considers sustainable transport modes in planning decisions.</td><td>the Plan's approach to sustainable transport.</td></tr>
<tr><td colspan="4">Chapter 5
Modifying and restructuring chapter 5. Changes to the proposed submission structure outlined below

<table>
<tr><th>Proposed Submission Structure</th><th>Proposed new structure</th></tr>
<tr><td>5. Current Waste Management in North London

<u>Waste generated in North London</u>
Monitoring: Table 2: waste arisings (baseline 2016)

<u>Existing facilities</u>
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

<u>How North London's waste is currently managed</u>
Table 4: Waste exported from North London 2011-2016</td><td>5. Current Waste Management in North London

<u>Waste generated in North London</u>
Monitoring: Table 2: waste arisings (baseline 2016)

<u>How North London's waste is currently managed</u>
Revised Table 4 (now Table 3): The amount of North London's waste managed in North London and elsewhere</td></tr>
</table></td></tr>
<tr><td>AM</td><td>5.1</td><td>This section looks at the current picture of waste management in North London, including the amount of waste generated, how and where it is currently managed; future waste arisings; <s>the</s></td><td>Contributes to</td></tr>
</table>

Reference	Section	Further modification	Justification
		~~current~~ existing capacity; ~~types and location of facilities~~ **capacity gaps; and how North London's waste will be managed over the plan period.** ~~how each waste stream is managed, key targets and cross-boundary movements of waste~~	consistency, clarity and/or correct errors
AM	5.2	The Waste Data Study was **first** prepared in July 2014 and updated in July 2015 to inform the Draft NLWP. A further update in 20198 accompanie**d ~~s~~ ~~this~~ the** Proposed Submission Plan. All versions of the Data Study are available to view on NLWP website (www.nlwp.net). The Waste Data Study is in three parts as shown below, with the date of the most recent version provided in brackets: • Part One: North London Waste Arisings (201**9**~~8~~) • Part Two: North London Waste Capacity (201**9**~~8~~) • Part Three: North London Sites Schedule (201**9**~~8~~)	Contributes to consistency, clarity and/or correct errors
MM12	New after 5.3	**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.**	These modifications are required to ensure clarity about the strategy for North London's Waste and demonstrate that it is positively prepared

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td></td><td></td><td></td><td>and justified.</td></tr>
<tr><td>AM</td><td>5.4 Table 2</td><td>Table 2 below shows the amount of waste generated in North London for the main waste streams using ~~the latest~~ baseline data from 2016. Waste arisings vary from year to year and these figures represent a snapshot in time. Figure 8 shows the proportion of each waste stream as a percentage of the total waste in North London.

Table 2: Amount of Waste Generated in North London, 2016
<table>
<tr><th>Waste Stream</th><th>Tonnes Arising</th></tr>
<tr><td>Local Authority Collected Waste (LACW)</td><td>845,776</td></tr>
<tr><td>Commercial and Industrial Waste (C&I)</td><td>762,301</td></tr>
<tr><td>Construction and Demolition Waste (C&D)</td><td>443,180</td></tr>
<tr><td>Agricultural Waste</td><td>9,223</td></tr>
<tr><td>Hazardous waste</td><td>534,420</td></tr>
<tr><td>Excavation Waste</td><td>747,242</td></tr>
<tr><td>TOTAL</td><td>2,861,062</td></tr>
</table></td><td>Contributes to consistency, clarity and/or correct errors</td></tr>
<tr><td>MM13</td><td>New after Fig 8</td><td>How North London’s waste is currently managed

Around 66% of waste generated in North London is managed in North London, excluding excavation waste. 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>These modifications are required to ensure clarity about the strategy for North London’s Waste and</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td></td><td></td><td></td><td>demonstrate that it is positively prepared and justified.</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 (2016) ~~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>These modifications are required to ensure clarity about the strategy for North London’s Waste and demonstrate that it is positively prepared and justified.</td></tr>
<tr><td></td><td>5.5-5.7 Fig 9</td><td>[moved to section 6]</td><td></td></tr>
</table>

Reference	Section	Further modification	Justification
	5.8	[moved to after 5.26]	
AM	5.9	Local Authority Collected Waste **The data for this waste stream is the most reliable. Local Authority Collected Waste (LACW) is reported annually by the North London Waste Authority (NLWA) and data from all waste authorities are published by government along with statistics.** In North London, around ~~850~~845,7~~0~~00 tonnes of LACW was collected in 2016/17 . Of this, approximately **224,500** (27~~6~~%) was recycled, reused or composted**, below the 30% London average**. Of the remaining LACW, **541,300** (6~~4~~0%) was sent to NLWA's energy-from-waste facility at Edmonton **(above the London average of 60%)** and **68,900** (8~~1~~2%) was sent to landfill outside of North London (**below the London average of 12.5%). For household waste only the recycling rate was 32% which is just below the London average of 33%.**	Contributes to consistency, clarity and/or correct errors
AM	5.10	The NLWA has reported an increase in recycling performance **for household waste** from 23% in 2006/7 to 32% **by 2016/17**. **The percentage of waste going to landfill fell from 36% in 2006/07 to 8% in 2016/17.** ~~2017/18 This is lower than the national average of 43.7% but in line with the London average of around 33%.~~ There are a number of factors which contribute towards lower recycling rates in London than the country as a whole. These include: rapid population growth; a greater transient population than anywhere else in the UK; the greater proportion of flats compared to houses which presents challenges for setting up collection systems for recyclable waste; and proportionately fewer gardens generating lower level of green waste for recycling.	Contributes to consistency, clarity and/or correct errors
	5.11-5.16	[Moved to section 6]	
AM	5.17	The Waste Data Study has used two methods to identify ~~and project~~ C&I waste **arisings**. The first is to use data from the Defra C&I Waste Survey 2009 in line with the London Plan to assess the management routes of North London's C&I waste. The second is to use the ~~new~~ method **based on published data from the Environment Agency's Waste Data Interrogator (WDI), introduced in 2014** ~~for calculating C&I waste as introduced following the withdrawal of the Defra C&I surveys which uses published data from the EA's WDI~~. **The Boroughs have used the 2014 'WDI methodology' for this plan.** This ~~new~~ method of calculation indicates that **around 760,000 tonnes**	Contributes to consistency, clarity and/or correct errors

Reference	Section	Further modification	Justification
		of C&I waste was generated in North London in 2016. Of this, 335,400 tonnes (44%**)** of C&I waste ~~is~~ **was** recycled, reused or composted while **251,600 tonnes (**33%**)** of this waste stream ~~is~~ **was** sent to landfill and land recovery. **Around 29,600 tonnes** (17%) **was** sent for thermal treatment with energy recovery **and a** small proportion (6%) of C&I ~~is~~ **was** sent for non- thermal treatment. **A high proportion of this waste (around 43%) is currently exported from London.** ~~with the remainder (17%) sent for thermal treatment with energy recovery. It should be noted that potential reliance on landfill will drop to 10% by 2030 in order to achieve EU statutory targets with recycling and reuse levels increasing to 65%.~~	
	5.18-20	[Moved to section 6]	
AM	5.21	Local planning policies and development industry practice mean a lot of C&D material is managed on site and does not enter the waste stream. A total of 443,180 tonnes of C&D waste and 747,243 tonnes of excavation waste was produced in North London in 2016. The largest proportion of C&D waste arising in North London is managed via recycling (73%) and treatment (20%) facilities, with 7% sent directly to landfill. Recycling rates of C&D waste are high due to the nature and value of the material **and most of this takes place in North London or elsewhere in London**. Excavation materials are primarily disposed of **outside North London** directly to landfill (53%) with the remainder managed through transfer stations (28%) or sent for treatment (19%).	Contributes to consistency, clarity and/or correct errors
AM	5.22	~~F~~A total of 53,420 tonnes of hazardous waste was produced in 2016, of this waste 40% was managed at treatment facilities, of which the majority was exported for treatment outside of North London.	Contributes to consistency, clarity and/or correct errors
	5.23	[Moved to section 6]	
AM	5.26	Waste Water Treatment Works in North London are operated by Thames Water. The main Thames Water Waste Water/sewage treatment facility in North London is Deephams Sewage Treatment Works (STW), which is the ninth largest in England. The site is to be retained and improved for waste water use and planning permission has been granted for an upgrade to the **effluent** ~~sewage sludge~~	Contributes to consistency, clarity

Reference	Section	Further modification	Justification
		treatment stream. Thames Water anticipates that the recently ~~approved~~ constructed upgrade to Deephams STW will provide sufficient effluent treatment capacity to meet their needs **into the next decade** ~~during the plan period~~. **However, this will be reviewed in future AMP periods to ensure ongoing capacity in relation to population growth.** Further details can be found in section **7**~~8~~.	and/or correct errors
AM	5.8 [moved here]	Cross Boundary Movements (exports and imports) ~~Conversely,~~ North London does not have all the types of facilities necessary to manage all the sub-types of waste arising within the main ~~categories~~ **waste streams** shown in Table 2. For example, there are few specialist hazardous waste facilities and no landfill sites in North London **and so waste which requires these types of facilities will continue to be exported. Exports of waste arising in North London will need to be balanced out by an equivalent amount of additional capacity within North London.** ~~North London will therefore need to identify sufficient capacity to manage the equivalent amount of this exported waste within its boundary.~~	Contributes to consistency, clarity and/or correct errors
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.~~	These modifications are required to ensure clarity about the strategy for North London's Waste and demonstrate that it is

Reference	Section	Further modification	Justification
			positively prepared and justified.
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.~~	These modifications are required to ensure clarity about the strategy for North London's Waste and demonstrate that it is positively prepared and justified.
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**	These modifications are required to ensure

Reference	Section	Further modification	Justification
		London's waste exports and to understand any issues which could prevent similar amounts of waste being exported in the future. **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.**	clarity about the strategy for North London's Waste and demonstrate that it is positively prepared and justified.
AM	5.28	During 2013-2016 waste exports from North London were deposited in more than 70 different waste planning authority areas but the majority (88%) went to eight main destinations. These are shown in the Figure 11 below: Figure 11: ~~Distributions~~ **Destinations** of Waste Exports from North London	Contributes to consistency, clarity and/or correct errors
	5.29	[Moved to before 5.27]	
AM	7.6 (part) [Moved here to	**In particular, ~~T~~t**he North London Boroughs have engaged with each of the main recipients of North London's waste to landfill and identified if there are planning reasons why similar exports of waste cannot continue over the plan period, for example the planned closure of a site. ~~North London Exports to Landfill 2017-2032 (2018). there are sites and available void space in London, South East~~	Contributes to consistency, clarity

Reference	Section	Further modification	Justification
	after 5.30]	~~and East of England to take North London's estimated waste exports to 2035. The Boroughs will continue to co-operate with waste planning authorities who receive North London's waste, and mechanisms for monitoring waste movements after the NLWP is adopted are set out in in section 10.~~	and/or correct errors
AM	5.31	Engagement to date has identified a constraint to the continuation of waste exports to landfill from North London relating to the scheduled closure of **some** landfill sites during the plan period~~. Details can be found in the paper, Exports to Landfill 2017-2035, on the NLWP website (www.nlwp.net)~~, though the operation of some of these sites may be extended beyond their currently permitted end date. [Moved from 5.30] This work is set out in the **Duty to Co-operate Report** ~~*North London Exports to Landfill 2017-2032* (2018~~). [Moved to 5.32] 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. ~~The boroughs will continue to monitor this information throughout the preparation of the NLWP, and after it~~ the NLWP ~~is adopted as reflected in the monitoring framework in section 10.~~	Contributes to consistency, clarity and/or correct errors
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~~	These modifications are required to ensure clarity about the strategy

Reference	Section	Further modification	Justification
		~~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] 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.	for North London's Waste and demonstrate that it is positively prepared and justified.
AM	5.33	A further constraint for the continued export of waste has been identified with regard to hazardous waste, namely a lack of detailed data on where it ends up. This type of waste is managed in specialist facilities which have wide catchment areas and therefore may not be local to the source of the waste. North London has ~~one~~ hazardous waste ~~treatment facility with a~~ capacity of around **4,250** ~~3,600~~ tonnes per annum, **mainly for** ~~and two recycling facilities; one for metals and one~~ for end of life vehicles ~~handling around 2,500 tonnes per annum between them~~. The treatment facilities handle a small proportion of North London's hazardous waste (~~less than 1~~ **around 8**% ~~in 2016~~) while the rest (~~99.4~~**92**%) is exported. ~~In addition, some facilities, whilst not classified as hazardous waste facilities, are permitted to manage a certain amount of hazardous waste alongside non-hazardous wastes. These include car breakers and metal recycling sites, WEEE sites as well as RRCs which will accept, for example, paints and batteries which require specialist treatment and disposal.~~	Contributes to consistency, clarity and/or correct errors
AM	5.34	While the export of the majority of hazardous waste to the most appropriate specialist facilities is likely to continue, current data collection methods do not identify the hazardous waste facilities in	Contributes to

Reference	Section	Further modification	Justification
		question. No planning issues have been identified which will prevent North London's hazardous **waste continuing to be managed at** ~~these~~ **specialist hazardous facilities in any of the areas which receive significant amounts of hazardous waste exports from North London**. ~~However, the boroughs will continue to monitor engage with the Environment Agency and waste planning authorities in receipt of hazardous waste exports from North London and engage with recipient authorities when and if there are any substantial changes. including seeking to identify any constraints to the continued export of this waste. Should any constraints come to light, such as anticipated closure of a facility, the boroughs will seek to identify potential new destinations with capacity for managing compensatory amounts. The North London Boroughs will pursue agreement on this matter with recipient waste planning authorities through a statement of common ground.~~	consistency, clarity and/or correct errors
AM	5.35	The North London Boroughs will continue **to monitor hazardous waste exports from North London and engage with waste planning authorities who receive strategic amounts of North London's waste when and if there are any substantial changes which may affect waste planning in their area.** ~~co-operate with relevant authorities on matters of strategic waste planning throughout the preparation of the NLWP and once the Plan is adopted.~~	Contributes to consistency, clarity and/or correct errors

Chapter 6

Modifying and restructuring chapter 6. Changes to the proposed submission structure outlined below

Proposed Submission Structure	Proposed new structure
6. Future waste management requirements Targets for North London's waste management Table 5: Recycling and Recovery Targets with 2016 Baseline Options for managing North London's waste	**6. Future waste management requirements** Targets for North London's waste management Updated Table 5 (now Table 4): Recycling and Recovery Targets with 2016 Baseline Options for modelling North London's future waste arisings

Reference	Section	Further modification	Justification
		Meeting the Capacity Gap Table 6: Capacity gaps throughout the Plan period –chosen option Table 7: Land take requirements for meeting net self-sufficiency for LACW, C&I and C&D (requirements for London Plan apportionment in brackets)	New table (5): Options considered for forecasting North London's waste arisings Monitoring: Revised Table 8 (now Table 6): Projected arisings and management of North London's waste 2020-2035 (linked to Table 2) Existing capacity Revised Table 3 (now Table 7): Existing Annual Capacity at Licensed Operational Waste Management Facilities at the start of the plan period Meeting the Capacity Gaps Revised Table 6 (now Table 8): Capacity gaps throughout the Plan period New Table 9: Reference Capacities for Land Take for New Waste Facilities Revised Table 7 (now Table 10): Indicative land take requirements for meeting the capacity gap	
MM19	6.3 and Table 5	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 London Plan (March 2021)** are as follows: Table 5: Recycling and Recovery Targets with 2016 Baseline	These modifications are required to ensure clarity about the

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><th>Waste stream</th><th>Target</th><th>2016 baseline</th></tr>
<tr><td>LACW</td><td><s>50% recycling for LACW by 2025 (c</s>
Contributing towards 65% recycling of municipal waste by 2030<s>)</s></td><td>27<s>9</s>%</td></tr>
<tr><td>C&I</td><td><s>75% recycling by 2030 (c</s>
Contributing towards 65% recycling of municipal waste by 2030<s>)</s></td><td>44<s>52</s>%</td></tr>
<tr><td>C&D</td><td>95% reuse/recycling/recovery <s>by 2020</s></td><td>93<s>50-60</s>%</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>strategy for North London’s Waste and demonstrate that it is positively prepared and justified.</td></tr>
<tr><td></td><td>6.4</td><td>[Moved below to make way for 5.11-5.16, 5.18-5.21, 5.23]</td><td></td></tr>
<tr><td>AM</td><td>5.11</td><td>[Moved to after Table 5]

The North London Boroughs and the NLWA are committed to achieving the 50% recycling by 2025 target set out in <s>the Joint Municipal Waste Management strategy and</s> the Mayor’s Environment Strategy<s> London Plan</s>. The North London Boroughs, together with the NLWA, are beginning a renewed drive to increase recycling including looking at ways to standardise collection regimes. In addition, the London Waste and Recycling Board (LWARB) works with London Boroughs to increase recycling rates and supports waste authorities in improving waste management services.</td><td>Contributes to consistency, clarity and/or correct errors</td></tr>
<tr><td></td><td>5.12</td><td>[Moved here]</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</td><td>These modifications are required</td></tr>
</table>

Reference	Section	Further modification	Justification
		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.~~	to ensure clarity about the strategy for North London's Waste and demonstrate that it is positively prepared and justified.
	5.14	[Moved here]	
	5.15	[Moved here]	
	5.16	[Moved here]	
AM	5.18	[Moved here] ~~C&I~~ **Commercial and Industrial Waste** Through the London Environment Strategy, the Mayor is seeking to make London a zero waste city with no biodegradable or recyclable waste sent to landfill by **2026** ~~2030~~ and by aiming to achieve 65% recycling from London's municipal waste **by 2030;** this will be achieved through a 50% recycling rate from LACW by 2025 (Policy 7.2.1) and 75% from business waste by 2030 (policy 7.2.2). **This is a collective target across the whole of London.** The Mayor has also said that he does not expect there to be a need for any new energy from waste capacity if existing planned sites are completed	Contributes to consistency, clarity and/or correct errors

Reference	Section	Further modification	Justification
		(policy 7.3.2.b). The Mayor has also indicated that he will use his powers to ensure there are sufficient sites to manage London's waste. The Environment Strategy embraces the **principles** ~~ideals~~ of the Circular Economy requiring manufacturers to design products to generate less waste and which can be easily repaired, reused and recycled, and the strategy encourages the development of business to facilitate this.	
	5.19	[Moved here]	
	5.20	[Moved here]	
MM21	5.21	[Part of 5.21 moved here] The London Plan **(March 2021)** 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.**	These modifications are required to ensure the wording in the NLWP is consistent with the London Plan (March 2021) and NPPF.
	5.23	[Moved here]	
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	These modifications are required

Reference	Section	Further modification	Justification
		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).~~ [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	to ensure clarity about the strategy for North London's Waste and demonstrate that it is positively prepared and justified.

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td></td><td></td><td>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 and need
<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">Capacity 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>
<tr><td colspan="6">Growth Options</td></tr>
<tr><td></td><td>No growth (0% pa)</td><td>No growth (0% pa)</td><td>No growth (0% pa)</td><td>No growth (0% pa)</td><td>No growth (0% pa)</td></tr>
<tr><td></td><td>Minimised growth (0.40% pa)</td><td>Minimised growth (0.40% pa)</td><td>Minimised growth (0.40% pa)</td><td>Minimised growth (0.40% pa)</td><td></td></tr>
<tr><td>NLWA Waste Forecasting Model[3]</td><td>Growth (0.81% pa)</td><td>Growth (0.81% pa)</td><td>Growth (0.81% pa)</td><td>Growth (0.81% pa)</td><td></td></tr>
</table></td><td>These modifications are required to ensure clarity about the strategy for North London's Waste and demonstrate that it is positively prepared and justified.</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><th colspan="6">Management Options</th></tr>
<tr><td></td><td>Baseline (no change)</td><td>Baseline (no change)</td><td>Baseline (no change)</td><td>Baseline (no change)</td><td>Baseline (no change)</td></tr>
<tr><td></td><td>Median
80% recycling by 2035
16% Energy Recovery by 2035
4% to Landfill by 2035</td><td>Median
85% recycling
9% treatment
6% landfill</td><td></td><td></td><td></td></tr>
<tr><td>NLWA Forecasting model Central Scenario
44% recycling by 2035
(50% HH recycling by 2035)
55% Energy Recovery by 2035
1% landfill</td><td>Maximised
85% Recycling by 2035
12% Energy Recovery by 2035
3% to Landfill by 2035</td><td>Maximised
95% recycling / recovery / reuse
5% landfill</td><td>Maximised
95% beneficial use
5% landfill</td><td></td><td></td></tr>
</table>
</td><td></td></tr>
</table>

Reference	Section	Further modification	Justification
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 (201~~8~~**9**) 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 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.~~	These modifications are required to ensure clarity about the strategy for North London's Waste and demonstrate that it is positively prepared and justified.
AM	6.5	~~Chosen Approach~~ The chosen approach for the NLWP following the option appraisal can be summarised as follows: **Chosen Approach for planning for North London's waste** Population/Economic Growth in line with London Plan forecasts + Maximising Recycling + Net self-sufficiency for LACW**,** ~~and~~ C&I and C&D by 2026 ~~and C&D by 2035~~**(including hazardous waste)** = Quantity of waste to be managed	Contributes to consistency, clarity and/or correct errors

Reference	Section	Further modification	Justification
MM25	New below 6.6	**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.** **Table 8 sets out waste arisings over the plan period and how much of the total will need to be recycled to meet the Mayor's targets shown in Table 2. The LACW figures in Table 8 are taken from the NLWP data study which reflects the NLWA modelling. The NLWA model is based on achieving 50% household waste recycling. Over 80% of total LACW is household waste and the remainder is mostly business waste. The NLWA model assumes business waste recycling improves gradually over time as business waste recycling continues to be encouraged and recycling behaviours change. The combined household and business waste recycling rate in the NLWA model is 44%. In order to meet the Mayor's target of 65% recycling of municipal waste by 2030, around 85% of the 'municipal' portion of the C&I waste stream needs to be recycled. The 'municipal' portion of the C&I waste stream is estimated to be around two thirds of the total [**footnote**]. The recycling rates for the municipal portion of the C&I waste stream rise to 85% by 2030 which, together with household and business waste recycling in the LACW waste stream, achieves 65% recycling of municipal waste by 2030 in line with the Mayor's target. The C&D waste stream has a recycling rate of 95% and excavation waste a beneficial use rate of 95% in line with the London Plan targets.** **[footnote] Separate figures for municipal and other C&I waste are set out in the Data Study Addendum Appendix A: Waste arisings forecast scenario taken forward in the NLWP.**	These modifications are required to ensure clarity about the strategy for North London's Waste and demonstrate that it is positively prepared and justified.

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

</td><td>These modifications are required to ensure clarity about the strategy for North London's Waste and demonstrate that it is positively prepared and justified.</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td></td><td></td><td>
<table>
<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 arisings</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 6<s>3</s> below summarises <s>shows</s> the existing (2016<s>8</s>) capacity of North London's waste management facilities <s>in North London</s> by type of facility and waste stream managed <s>and changes in available capacity at known dates when facilities come on stream/close</s>. It identifies an existing waste management capacity of <s>around 4.4</s> 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. <s>reducing to around 3.8 million tonnes by 203529 as a result of known closure of some existing sites up to 2028</s> . Figure 9 shows the location of the facilities represented in Table 3 and a full list is in Appendix 1.</td><td>These modifications are required to ensure clarity about the strategy for North London's Waste and demonstrate that it is positively prepared and justified.</td></tr>
<tr><td>MM28</td><td>Table 3 [Revised and moved here after 5.5]</td><td>Table 3: <s>Maximum</s> Existing Annual Capacity at Licensed Operational Waste Management Facilities <s>at the Start of the Plan Period and a key dates following changes in sites capacities</s>
<table>
<tr><th colspan="2">Type of capacity</th><th>Waste stream</th><th>Existing capacity (2016)</th></tr>
<tr><td rowspan="2">Ma nag</td><td rowspan="2">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>
</table>
</td><td>These modifications are required to ensure clarity</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td></td><td></td><td>Hazardous</td><td>4,252</td></tr>
<tr><td></td><td>Energy Recovery</td><td>LACW / C&I</td><td>597,134</td></tr>
<tr><td></td><td>Transfer</td><td>All</td><td>1,225,068</td></tr>
<tr><td></td><td>Landfill</td><td>All</td><td>0</td></tr>
</table>
Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2012-2016
</td><td>about the strategy for North London's Waste and demonstrate that it is positively prepared and justified.</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>These modifications are required to ensure clarity about the strategy for North London's Waste and demonstrate that it is</td></tr>
</table>

Reference	Section	Further modification	Justification
			positively prepared and justified.
MM30	New paragraph after repositioned 5.6	**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.**	These modifications are required to ensure clarity about the strategy for North London's Waste and demonstrate that it is positively prepared and justified.
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**	These modifications are required to ensure

Reference	Section	Further modification	Justification
		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.'~~	clarity about the strategy for North London's Waste and demonstrate that it is positively prepared and justified.
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.	These modifications are required to ensure clarity about the strategy for North London's Waste and demonstrate that it

Reference	Section	Further modification	Justification
			is positively prepared and justified.
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.**	These modifications are required to ensure clarity about the strategy for North London's Waste and demonstrate that it is positively prepared and justified.
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	These modifications are required

Reference	Section	Further modification	Justification
		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.	to ensure clarity about the strategy for North London's Waste and demonstrate that it is positively prepared and justified.
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 a new Waste Transfer Station (WTS) at Geron Way was granted by Barnet Council in September 2018 (Barnet planning application reference 17/6714/EIA)**. 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 **has commenced** ~~is anticipated will commence in early 2018~~. ~~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~~	These modifications are required to ensure clarity about the strategy for North London's Waste and demonstr

Reference	Section	Further modification	Justification
		~~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 currently identified for redevelopment in Phase 4 of the BXC regeneration. It is planned that capacity at the waste facilities of BAR 4, BAR 6 and BAR 7 and part of the capacity of BAR 3 would 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 would need to be identified prior to its redevelopment and the London Borough of Barnet will seek to provide replacement capacity within the borough. The Barnet Local Plan will identify potential sites. For the purposes of the NLWP, therefore, it is assumed there will be no loss of capacity for these facilities.**	ate that it is positively prepared and justified.
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.**	These modifications are required to ensure clarity about the strategy for North London's Waste and demonstrate that it is positively prepared and justified.

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td>MM37</td><td>6.7</td><td>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 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>These modifications are required to ensure clarity about the strategy for North London’s Waste and demonstrate that it is positively prepared and justified.</td></tr>
<tr><td>MM38</td><td>Table 6</td><td>[Revised]

Table ~~7~~6: Capacity gaps throughout the Plan period (tonnes) ~~– chosen option~~

<table>
<tr><th>LACW/C&I</th><th>2020</th><th>2025</th><th>2030</th><th>2035</th></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>1,076,129</td><td>1,076,129</td><td>1,076,129</td><td>1,076,129</td></tr>
</table>
</td><td>These modifications are required to ensure clarity about the strategy for North</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td></td><td></td><td>
<table>
<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>-101,218</td><td>-78,013</td><td>-125,058</td><td>-174,579</td></tr>
</table>
<table>
<tr><th>C&D</th><th>2020</th><th>2025</th><th>2030</th><th>2035</th></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><th>Hazardous</th><th>2020</th><th>2025</th><th>2030</th><th>2035</th></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>London’s Waste and demonstrate that it is positively prepared and justified.</td></tr>
<tr><td>MM39</td><td>New para after Revised Table 6, now Table 7</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>These modifications are required to ensure clarity about the strategy for North London’s Waste and demonstr</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td></td><td></td><td></td><td>ate that it is positively prepared and justified.</td></tr>
<tr><td>MM40</td><td>6.8</td><td><s>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</s> 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 <s>the table</s> Table 8 below. Table 20 in section 7 of the Data Study Part 2 (201<s>8</s>) <s>available on the website (www.nlwp.net)</s> provides a fuller explanation. Table 9 below sets out the amount of land required within North London to meet the capacity gaps identified in Table 7 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>These modifications are required to ensure clarity about the strategy for North London’s Waste and demonstrate that it is positively prepared and justified.</td></tr>
<tr><td>MM41</td><td>New Table</td><td>Table 8: Reference Capacities for Land Take for New Waste Facilities
<table><tr><th>Facility type</th><th>Assumed tonnes per hectare</th></tr></table></td><td>These modifications are</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td></td><td></td><td>
<table>
<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>
<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>required to ensure clarity about the strategy for North London’s Waste and demonstrate that it is positively prepared and justified.</td></tr>
<tr><td>MM42</td><td>Table 7</td><td>[Table 7 revised]

Table 9: Indicative land take requirements for meeting the capacity gap <s>net self-sufficiency for LACW, C&I and C&D (requirements for London Plant apportionment in brackets)</s>

<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>These modifications are required to ensure clarity about the strategy for North London’s Waste and</td></tr>
</table>

Reference	Section	Further modification	Justification
			demonstrate that it is positively prepared and justified.
AM	6.9	~~Although Table 7 identifies a need for recovery facilities for C&I waste, this need is immediate and declines over the plan period to when the Edmonton Energy Recovery Facility is completed. For this immediate need to be met facilities would need to be in place now, or at least in planning, which is not the case. Therefore it is highly probable that this need will not be met and that C&I waste requiring recovery will continue to be exported in the short term. As highlighted earlier the Mayor's Environment Strategy states that the Mayor does not want any additional energy from waste capacity over the plan period as existing sites should be able to meet the needs of all municipal waste arisings. The main need identified is for the provision of construction and demolition recycling facilities in order that the 95% recycling target for this waste stream can be achieved.~~ There is ~~also~~ a requirement ~~throughout~~ for additional recycling ~~facility~~ **capacity** to manage the increasing levels of recycled waste expected from the **LACW/**C&I waste stream reflecting the ~~75%~~ recycling target ~~in order to achieve the Environment Strategy target~~ of 65% from municipal waste (LACW and commercial waste). ~~A further 1ha is identified for additional treatment facilities for LACW, C&I and CDE.~~	Contributes to consistency, clarity and/or correct errors
MM43	6.10	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 nature. The Boroughs will	These modifications are required to ensure clarity about the

Reference	Section	Further modification	Justification
		therefore work with the GLA and other boroughs across London to identify and meet a regional need.	strategy for North London's Waste and demonstrate that it is positively prepared and justified.
AM	6.11	~~The Data Study concludes that over the NLWP plan period there are capacity gaps for C&I, CD&E and Hazardous waste, and that North London will require additional facilities to meet these. In relation to the gap for Hazardous waste, the North London Boroughs will contribute to the planning for hazardous waste facilities at a regional level and through the identification of areas within North London that may be suitable for hazardous waste facilities.~~ Additional land is not required to accommodate new facilities for Low Level Non-Nuclear Radioactive Waste (LLW), Agricultural Waste or Waste Water/Sewage Sludge during the plan period. ~~More information about how each waste stream will be managed can be found in the Provision for North London's Waste to 2035 (section 7).~~	Contributes to consistency, clarity and/or correct errors
AM	New after 6.11	**The following section sets out the process of identifying suitable locations for new waste capacity to meet the capacity gaps set out in Table 7.**	Contributes to consistency, clarity and/or correct errors
Chapters 7 and 8			

Reference	Section	Further modification	Justification
Chapters 7 and 8 have been swapped over to improve the flow of the Plan			
AM	8.1	This section sets out the approach to **ensuring that there is** ~~identifying~~ sufficient land for future waste management facilities in North London to ~~ensure~~ **provide for** the delivery **of North London's** ~~the~~ identified capacity requirements. Sections 3-6 of the **National Planning Policy for Waste (**NPPW**)** set out the approach Local Plans should take to identify future waste requirements over the plan period and this has been used to help develop the approach to identifying future locations for waste development in North London. ~~Assessment criteria have been developed using waste planning policy and in consultation with key stakeholders in a series of focus groups.~~	Contributes to consistency, clarity and/or correct errors
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**	These modifications are required to ensure clarity about how the Plan has identified sufficient land for future waste management facilities in North London and

Reference	Section	Further modification	Justification
		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.**	demonstrate that it is positively prepared and justified.
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~~ London Plan 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.	These modifications are required to ensure clarity about how the Plan has identified sufficient land for future waste management facilities in North London and demonstr

Reference	Section	Further modification	Justification
			ate that it is positively prepared and justified.
AM	8.3	~~Expansion of Existing Waste Management Facilities~~ ~~Existing waste management facilities are also a key part of future provision. A call for sites exercise in 2014 targeted existing waste operators in North London, seeking information on any planned capacity expansion or upgrades to existing facilities. Three sites were put forward: Edmonton EcoPark, Deephams Sewage Treatment Works and Powerday in Enfield. Any applications for expansion or consolidation of existing waste management sites will be considered against NLWP policies and those of the Borough Local Plan in which the proposal is situated. A further exercise was also undertaken in 2018 but no new sites were put forward for expansion.~~	Contributes to consistency, clarity and/or correct errors
	8.4	[Moved to Section 7 and included in 7.12]	
	8.5	[parts moved to Section 6 and 7]	
	8.6	[Moved to Section 6]	
	8.7	[Moved to Section 7]	
AM	8.8	[Deleted]	Contributes to consistency, clarity and/or correct errors
	8.9	[Moved to Section 7]	
	8.10-8.12	[Moved to Section 6]	

Reference	Section	Further modification	Justification
	8.13-8.19	[Moved to after 8.26 and Fig 13: Priority Areas for new waste management facilities ~~Location of proposed new areas~~]	
MM46	8.20	**When seeking suitable locations for new waste facilities, the Boroughs took into account NPPW paragraph 4 which states that waste planning authorities should "consider a broad range of locations including industrial sites" and "give priority to the re-use of previously developed land [and] sites identified for employment uses". The London Plan identifies suitable locations in policy SI8 as existing waste sites and SIL/LSIS. 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. However, in preparing the NLWP, the North London Boroughs have sought to refine this approach and direct new waste facilities towards locations assessed and selected as the most suitable in North London which are identified as "Priority Areas" in the Plan**. The ~~proposed site and area search~~ criteria used in the NLWP site **and area** selection process were developed based on the requirements of **the National Planning Policy Framework, National Planning Policy for Waste [footnote], Planning Practice Guidance and the London Plan** ~~national waste planning policy~~. Both planning and spatial criteria were discussed with key stakeholders through a focus group session in spring 2014 . **[footnote]** Following the introduction of the **National Planning Policy for Waste** (NPPW) in October 2014 **to replace Planning Policy Statement 10**, the site **and area** search criteria were reviewed to ensure compliance with this document.	These modifications are required to ensure clarity about how the Plan has identified sufficient land for future waste management facilities in North London and demonstrate that it is positively prepared

Reference	Section	Further modification	Justification
			and justified.
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: […] **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.**	These modifications are required to ensure clarity about how the Plan has identified sufficient land for future waste management facilities in North London and demonstrate that it is positively prepared

Reference	Section	Further modification	Justification
			and justified.
AM	8.23	~~**Draft Plan Consultation**~~ The sites and areas identified as a result of the methodology set out above were consulted on as part of the Draft Plan prepared under Regulation 18 of the Town and Country Planning Regulations 2012. **This was set out in the Sites and Areas Report 2015 which was updated in 2019 for the Proposed Submission NLWP.**	Contributes to consistency, clarity and/or correct errors
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**	These modifications are required to ensure clarity about how the Plan has identified sufficient land for future waste management facilities in North London and

Reference	Section	Further modification	Justification
			demonstrate that it is positively prepared and justified.
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.** **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.**	These modifications are required to ensure clarity about how the Plan has identified sufficient land for future waste management facilities in North London and demonstr

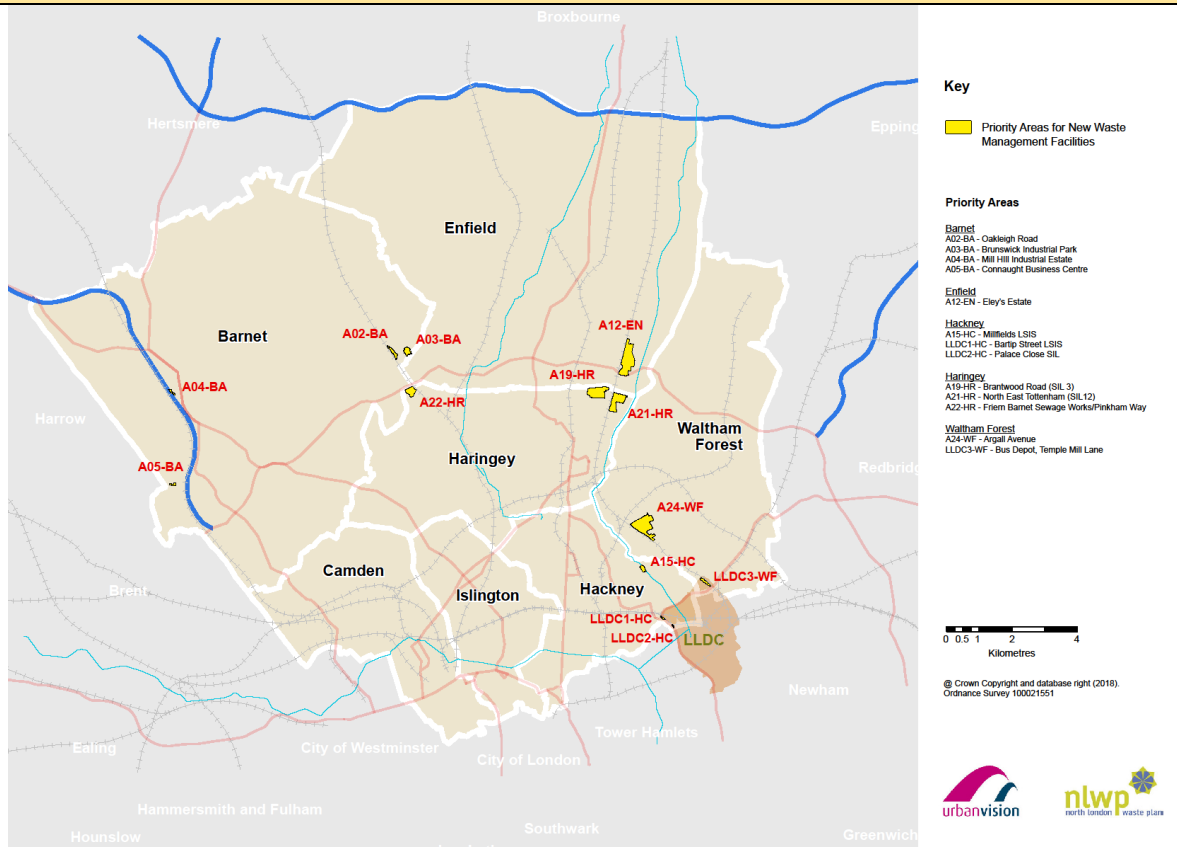
Reference	Section	Further modification	Justification
			ate that it is positively prepared and justified.
MM50	8.25 [restructured and split]	~~The North London Boroughs developed a range of reasonable options for taking forward sites and areas in the Proposed Submission version of the plan.~~ ~~Further~~ **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**	These modifications are required to ensure clarity about how the Plan has identified sufficient land for future waste management facilities in North London and demonstrate that it

Reference	Section	Further modification	Justification
		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 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.	is positively prepared and justified.
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.**	These modifications are required to ensure clarity about how the Plan has identified sufficient land for future waste management facilities in North London and demonstrate that it

Reference	Section	Further modification	Justification
		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 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**	is positively prepared and justified.

Reference	Section	Further modification	Justification
		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 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 Schedule**s** 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**	These modifications are required to ensure clarity about how the Plan has identified sufficient land for future waste management facilities

Reference	Section	Further modification	Justification
		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.~~	in North London and demonstrate that it is positively prepared and justified.
MM53	Figure 10	**Figure** 11~~0~~**: Priority Areas for new waste management facilities** ~~Location of proposed new areas~~	These modifications are required to ensure clarity about how the Plan has identified sufficient land for future waste management facilities in North

Reference	Section	Further modification	Justification
			London and demonstrate that it is positively prepared and justified.
	8.13-8.19	[Moved here]	
AM	8.13	The impact of Crossrail 2 **and Opportunity Areas** on existing **sites** and **Priority Areas** ~~proposed new areas~~	Contributes to consistency, clarity and/or

Reference	Section	Further modification	Justification
		Transport for London has been consulting on Crossrail 2. The timetable for a Hybrid Bill submission is at present unknown. Depending on the route selected, some existing waste sites and ~~proposed~~ areas identified as ~~suitable~~ **Priority Areas** for new facilities might be affected by the scheme.	correct errors
AM	8.14	At the time of publication, only one location (A02-BA-Oakleigh Road) within an ~~A~~**a**rea identified in Schedule 2: ~~New~~ **Priority Areas** for **new** waste management **facilities** has been identified in the Crossrail 2 safeguarding directions issued in January 2015. This plot of land (shown in Appendix 2) has been safeguarded in order to deliver part of the construction of Crossrail 2 and will be released after this is completed. However, as the scheme develops and further information is made available on the preferred route, there could be locations within other Areas, which may be required for the purpose of constructing Crossrail 2, particularly along the West Anglia Mainline. Once known, should applications for waste uses come forward in these locations, they will need to be subject of consultation with TfL and Network Rail as necessary.	Contributes to consistency, clarity and/or correct errors
AM	8.15	Furthermore, a number of the new Areas identified in Schedule 2 **Priority Areas for new waste management facilities** ~~Areas suitable for waste management~~ are in locations close to Crossrail 2 stations and could make a valuable contribution towards realising the wider benefits of Crossrail 2 in terms of both delivering additional homes and supporting wider regeneration. Those Areas which in part may have such a role in the longer term include: • A12-EN – Eley's Estate • A22-HR – Friern Barnet Sewage Works • A19-HR – Brantwood Road • A21-HR – North East Tottenham	Contributes to consistency, clarity and/or correct errors
	8.16-8.18	[Moved here]	
AM	8.19	How the impact of Crossrail 2 on the NLWP will be monitored and managed is addressed under Indicator ~~2~~ **IN4** of the monitoring arrangements in section 10.	Contributes to consistency, clarity and/or

Reference	Section	Further modification	Justification
			correct errors
		Chapter 7 moved here	
AM	New before 7.1	**Section 6 sets out North London's waste management capacity gap and Section 7 [currently 8] sets out the process of identifying sufficient land to meet that capacity gap. This Section brings this information together to set out how North London's waste management needs will be achieved over the plan period.**	Contributes to consistency, clarity and/or correct errors
AM	7.1	The North London Boroughs have developed the following ~~strategic~~ **over-arching policy** which sets out in broad terms how the waste management needs in North London over the plan period are being planned for.	Contributes to consistency, clarity and/or correct errors
AM	Strategic Policy	~~Strategic~~ **Over-arching** Policy for North London's Waste The North London Boroughs will identify sufficient capacity and land for the provision of waste facilities to manage the equivalent of 100% of waste arisings (net self-sufficiency) for Local Authority Collected Waste (LACW) and Commercial & Industrial (C&I) waste ~~by 2026~~ and Construction & Demolition (C&D) waste by **2026** ~~2035~~, including hazardous waste. The North London Boroughs will plan to manage as much of North London's excavation waste arisings within North London as practicable**, and to ensure that excavation waste exports are put to beneficial use**. To achieve this, the North London Boroughs will plan to manage the quantities of waste set out in Table **5** over the next 15 years.	Contributes to consistency, clarity and/or correct errors

Reference	Section	Further modification	Justification
		The North London Boroughs will encourage development on existing and new sites and that promotes the movement of waste up the waste hierarchy, increases management of waste as close to the source as practicable, and reduces exports of waste to landfill. The North London Boroughs will continue to co-operate with waste planning authorities who receive significant quantities of waste exports from North London.	
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 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 Schedule**s** 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.**	These modifications are required to ensure clarity about the Plan's waste management strategy and demonstrate that it is positively prepared and justified.
AM	7.3	Table **5** sets out the quantities of waste, by waste stream, which need to be managed within North London in order to meet STRATEGIC OBJECTIVE 3 and the policy for net self-sufficiency target for	Contributes to

Reference	Section	Further modification	Justification
		LACW~~,~~ ~~and~~ C&I **and C&D** waste by 2026 ~~and C&D~~ ~~waste by 2035~~, including hazardous waste ~~which is already counted in the LACW, C&I and CD&E figures~~ . Table **5** also takes account of the policy to ~~manage as much of North London's~~ **divert** excavation waste ~~arisings within North London as practicable~~ **away from landfill and towards beneficial use**. The quantities of waste take into account population and economic growth and waste targets including net self-sufficiency, apportionment, recycling and landfill diversion, set out in the London Plan. The North London Boroughs are planning to meet more than their apportionment targets and to manage the waste arisings for North London ~~set out in the London Plan~~. Further details of the methodology to estimate waste arisings is available in the NLWP Data Study (201**9**~~8~~).	consistency, clarity and/or correct errors
	Table 8	[Revised and moved to section 6, renumbered Table 6]	
MM55	7.4	The North London Boroughs will monitor the NLWP against the **projected** quantities of waste **generated** set out in Table **5**, **(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.	These modifications are required to ensure clarity about the Plan's waste management strategy and demonstrate that it is positively

Reference	Section	Further modification	Justification
			prepared and justified.
AM	7.5	~~To enable waste planning authorities outside London to plan for North London's waste exports, Table 9 shows projected exports to landfill outside the North London area. The figures represent waste which cannot be prepared for reuse, recycled/composted, or used for other recovery and therefore has to be exported to landfill. The North London boroughs will plan to manage the equivalent amount of exported waste within North London through waste imports however, in reality, some of North London's waste will continue to cross borders to be managed or disposed of in facilities which North London does not or cannot accommodate, such as landfill or specialist hazardous waste facilities.~~	Contributes to consistency, clarity and/or correct errors
	Table 9	[Revised and incorporated into (new) Table 6]	
AM	Fig 12	[deleted]	Contributes to consistency, clarity and/or correct errors
AM	7.6	[Moved to after 5.30] [The North London Boroughs have engaged with each of the main recipients of North London's waste to landfill and identified if there are planning reasons why similar exports of waste cannot continue over the plan period, for example the planned closure of a site.] [Moved to 5.31] [This work is set out in the Duty to Co-operate Report ~~North London Exports to Landfill 2017-2032 (2018)~~.] [Moved to 5.32]	Contributes to consistency, clarity and/or correct errors

Reference	Section	Further modification	Justification
		[The North London Boroughs have established that there is opportunity for the market to find alternative destinations in the wider south east for any 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.] ~~there are sites and available void space in London, South East and East of England to take North London's estimated waste exports to 2035. The Boroughs will continue to co-operate with waste planning authorities who receive North London's waste, and mechanisms for monitoring waste movements after the NLWP is adopted are set out in in section 10.~~	
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.~~	These modifications are required to ensure clarity about the Plan's waste management strategy and demonstrate that it is positively

Reference	Section	Further modification	Justification
			prepared and justified.
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.**	These modifications are required to ensure clarity about the Plan's waste management strategy and demonstrate that it is positively prepared and justified.
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~~ **required to prepare a** ~~North London~~ Joint Waste Strategy **(JWS) for North London. The most recent JWS came to an end in December 2020. A key element of that strategy has been met through the granting of permission for a replacement energy recovery facility at the Edmonton**	These modifications are required to ensure

Reference	Section	Further modification	Justification
		EcoPark to treat residual waste. A replacement JWS will be developed by NLWA in conjunction with the seven constituent boroughs, but requires a clear position on the circular economy and recycling from central government; it is hoped that this will be within the next year. The new Joint Waste Strategy will focus on activities to move all waste up the waste hierarchy. In the short term, a Residual Waste Reduction Plan has been agreed after consultation with constituent boroughs. This Plan forms a short-term strategic approach from NLWA, which will inform the development of the next Joint Waste Strategy. The NLWA expect a new JWS will be being developed in 2021 and 2022. A new JWS will set out how North London will contribute to the Mayor's recycling targets as set out in the London Plan and London Environment Strategy.	clarity about the Plan's waste management strategy and demonstrate that it is positively prepared and justified.
MM59	7.10	There is a need for additional capacity for recycling for ~~both~~ **the** LACW/~~ and~~ C&I waste stream~~s~~ throughout the plan period. ~~As~~ **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~~.	These modifications are required to ensure clarity about the Plan's waste management strategy and

Reference	Section	Further modification	Justification
			demonstrate that it is positively prepared and justified.
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.**	These modifications are required to ensure clarity about the Plan's waste management strategy and demonstrate that it is positively prepared and justified.

Reference	Section	Further modification	Justification
AM	7.12 including 8.4	*Recovery* Most LACW is managed at the Edmonton EcoPark facility which has an existing capacity of around 550**600**,000tpa. ~~It is intended that the existing Edmonton facility will be modified to enable connection to a heat network. The facility does not currently accept C&I waste from private operators.~~ In November 2014 the NLWA announced plans for the development of a new Energy Recovery Facility (ERF) - the North London Heat and Power Project - on their existing site at the Edmonton EcoPark in Enfield. This will replace the existing Energy from Waste (EfW) plant at the EcoPark that is coming to the end of its operational life.	Contributes to consistency, clarity and/or correct errors
AM	7.13 including 8.5	The ~~existing Edmonton facility will be replaced in 2025. The NLWA have gained consent for a~~ new Energy Recovery Facility (ERF) ~~with~~ will have a capacity of around 700,000 tonnes per annum to deal with all the residual waste under the control of the Authority from 2025 until at least 2050. ~~The planning framework for this site includes the Edmonton EcoPark Supplementary Planning Document and emerging Central Leeside Area Action Plan.~~ 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.'	Contributes to consistency, clarity and/or correct errors
AM	8.7 Moved here after 7.13	Once the new facility has been developed, the existing EfW facility will be demolished. The associated parcel of land, on which the current plant is located, will continue to be safeguarded for future waste use **as part of ENF18 in Schedule 1,** and will become available towards the end of the plan period. The development of Edmonton EcoPark for the new ERF will provide a strategic facility for the NLWP and provide a solution for managing the non-recyclable element of LACW. Delivery of this facility will see the NLWA continue to manage LACW from the North London Boroughs and help reduce the reliance on disposal of waste to landfill. Enfield Council have adopted Edmonton EcoPark Supplementary Planning Document and ~~have submitted~~ **are preparing** the Central Leeside Area Action Plan ~~for independent examination~~, both of which provide more detail on the planning framework and objectives for this site.	Contributes to consistency, clarity and/or correct errors
AM	7.14	As the existing EfW facility at Edmonton does not currently treat C&I waste, ~~there is an immediate capacity gap for recovery of C&I waste amounting to 1ha of land as identified in Table 7. However,~~	Contributes to

Reference	Section	Further modification	Justification
		~~as no such facilities are currently in the pipeline,~~ it is likely th**is**~~e~~ waste will continue to be exported in the short to medium term until 2025. After this time, the recovery requirement of C&I waste can be met by the new Edmonton ERF to the end of the plan period. ~~in line with the objectives of the Mayors Environment Strategy 2018~~	consistency, clarity and/or correct errors
MM61	New after 7.14	**There are opportunities for additional recovery capacity to be brought forward on three of the proposed Priority Areas.**	These modifications are required to ensure clarity about the Plan's waste management strategy and demonstrate that it is positively prepared and justified.
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.**	These modifications are required

Reference	Section	Further modification	Justification
			to ensure clarity about the Plan's waste management strategy and demonstrate that it is positively prepared and justified.
AM	7.18	~~The North London Boroughs have established that there are landfill sites in London, South East and East of England able to take North London's waste between 2017 and 2035. See Figure 12 for the anticipated decline in landfilling of North London's waste over the plan period.~~	Contributes to consistency, clarity and/or correct errors
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**	These modifications are required to ensure clarity

Reference	Section	Further modification	Justification
		will be sought. ~~particularly for Excavation waste. At least 95% of excavation waste exports will be put to beneficial use~~	about the Plan's waste management strategy and demonstrate that it is positively prepared and justified.
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 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.**	These modifications are required to ensure clarity about the Plan's waste management strategy and demonstr

Reference	Section	Further modification	Justification
			ate that it is positively prepared and justified.
AM	7.21	~~North London has a number of transfer facilities which also recycle CD&E waste but a large quantity is still exported to landfill, mainly excavation waste. Recycling opportunities are likely to be mainly for C&D wastes although around 28% of excavation waste is also recycled within North London, with 53% being disposed of directly to landfill and 19% through treatment facilities. Taking account of the diversion of C&D waste away from landfill, the Data Study has identified a capacity gap of around 67,000 tonnes per annum from 2029, rising to around 102,000 tonnes per annum by 2035 . Provision will be needed throughout the plan period.~~	Contributes to consistency, clarity and/or correct errors
AM	7.22	~~A total of 2 hectares of land will be required to facilitate this provision. Opportunities to re-use CD&E waste locally will be supported, though this cannot be predicted with any certainty. Policy 8 'Inert Waste' seeks to ensure that any planning application for the recycling and reuse of inert waste for all types of development demonstrates that viable opportunities to minimise construction and demolition~~ CD&E ~~waste disposal will be taken, making use of existing industry codes of practice and protocols, site waste management plans and relevant permits and exemptions issued by the Environment Agency.~~	Contributes to consistency, clarity and/or correct errors
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.~~	These modifications are required to ensure clarity about the Plan's

Reference	Section	Further modification	Justification
			waste management strategy and demonstrate that it is positively prepared and justified.
AM	7.24	~~The North London Boroughs, working with waste planning authorities who receive CD&E waste from North London, have identified constraints to the export of this waste and have established that there are both alternative landfill sites and adequate void space in London, South East and East of England to take North London's waste between 2017 and 2035. See Figure 12 for the anticipated decline in landfilling of North London's waste over the plan period.~~	Contributes to consistency, clarity and/or correct errors
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~~	These modifications are required to ensure clarity about the Plan's waste managem

Reference	Section	Further modification	Justification
		~~one for end of life vehicles handling around 2,500 tonnes per annum between them. In addition, other facilities permitted to manage hazardous waste~~	ent strategy and demonstrate that it is positively prepared and justified.
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 **4.92**~~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 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.	These modifications are required to ensure clarity about the Plan's waste management strategy and demonstrate that it is positively prepared

Reference	Section	Further modification	Justification
			and justified.
AM	7.28	The need for export to landfill of around 13,000 tonnes per annum, is expected to continue due to inability of the area for provide this type of facility. **This reflects the amount of hazardous waste which cannot be recycled or treated, for example asbestos.** The North London Boroughs will continue to work with waste planning authorities who receive hazardous waste from North London to identify constraints to the continued export of this waste and identify potential new destinations if necessary.	Contributes to consistency, clarity and/or correct errors
AM	7.31	The main Thames Water sewage treatment facility in North London is Deephams Sewage Treatment Works (STW), operated by Thames Water. Work to upgrade this facility was **largely** completed in 2017. Thames Water anticipates this will provide sufficient effluent treatment capacity to meet its needs **into the next decade** during the plan period. **However, this will be reviewed in future AMP periods to ensure ongoing capacity in relation to changing population growth predictions**. ~~Thames Water is also proposing an upgrade to the sewage sludge treatment stream at the site which will be sufficient to meet its needs during the plan period~~. It is therefore not necessary to identify additional land for this waste stream in the NLWP, however any new facility for waste water will be assessed against Policy ~~8~~ **7**.	Contributes to consistency, clarity and/or correct errors
AM	8.9 Moved after 7.31	~~Thames Water is also proposing an upgrade to the sewage sludge treatment stream at Deephams STW during its 2015 to 2020 business plan period by providing enhanced sludge treatment plant within the boundaries of the existing site.~~ Enfield Council will continue work with Thames Water and the Environment Agency to ensure that adequate and appropriate waste water treatment infrastructure is provided. Any new waste water facility will be assessed under Policy 7.	Contributes to consistency, clarity and/or correct errors
AM	9.2	The NLWP policies will help deliver the NLWP's aim and objectives (section 3), Spatial **Principles** ~~Framework~~ (section 4) and the ~~Strategy~~ **Overarching** Policy for North London's Waste (section 7). The supporting text sets out why the particular policy approach has been chosen, any alternatives considered and how the policy will be implemented.	Contributes to consistency, clarity and/or

Reference	Section	Further modification	Justification
			correct errors
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. 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	These modifications are required to clarify the status of existing waste sites.

Reference	Section	Further modification	Justification
		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.**	These modifications are required to clarify the status of existing waste sites.
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.	These modifications are required to clarify the status of existing waste sites.
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) 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	These modifications are required to clarify the status of existing waste sites.

Reference	Section	Further modification	Justification
		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 redeveloped for other uses, the amount and location of compensatory provision 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.**	These modifications are required to clarify the Plan's approach to site selection for compensatory capacity.

Reference	Section	Further modification	Justification
		[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.**	These modifications are required to clarify how monitoring will support the policies.
MM74	9.10	[…] The NPPF and the ~~draft~~ London Plan 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	These modifications are required

Reference	Section	Further modification	Justification
		development. Developers proposing non-waste development in close proximity to existing waste sites should be aware of the potential impacts on existing waste operations and plan this into their development so as not to prevent or prejudice the continued waste use in that location, otherwise such developments will not be permitted. Accordingly proposed non-waste developments should be designed to protect both the amenity of potential new residential developments and the existing waste operation within that area.	to ensure the NLWP is consistent with national policy and the London Plan.
MM75	New after 9.10	**Some existing waste sites may be having an adverse impact on surrounding uses such as schools and residential areas. The waste operator is responsible for ensuring that its regulated facility does not cause pollution of the environment and harm to human health. The operator's performance in relation to that responsibility is assessed by checking compliance with the terms and conditions of the permit. Environmental permits are issued by either the Environment Agency for large-scale facilities and those with greater risk to the environment (known as "A1 installations") or the local authority for smaller-scale facilities with lower risk to the environment (which include "A2 installations" and "Part B installations"). Local authorities hold a register of these permits which are available to view on request.** **The responsibility for checking compliance falls to the issuer of the permit (the regulator). The Environmental Permitting Regulations (EPR) place a duty on regulators to undertake appropriate periodic inspections of regulated facilities. The EPR are the basis for any enforcement action and the principal offences are:** • **operating a regulated facility without a permit;** • **causing or knowingly permitting a water discharge activity or groundwater activity without a permit; and**	These modifications are required to ensure that existing waste facilities do not cause harm to the environment or local communities

Reference	Section	Further modification	Justification
		• **failing to comply with a permit condition, flood risk activity emergency works notice, flood risk remediation notice or an enforcement-related notice.** **Operator competence can be considered by the regulator at any time, whether as part of the determination of an application or at any time during the life of the permit. The regulator can suspend or revoke the permit if an operator fails to comply with the conditions of the permit, risking harm to the environment or human health. 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. This will be published as part of the NLWP Annual Monitoring Report. Any additional information on enforcement action can be requested from the regulator.**	
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 5 and 7**. **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.** 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. **Development proposals for materials and waste management sites are encouraged where they**	These modifications are required to ensure clarity about how Spatial Principle B is delivered and demonstrate that the Plan is

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td></td><td></td><td>deliver a range of complementary waste management and secondary material processing facilities on a single site.

Applications for waste management development within the <s>areas</s> 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 <s>Framework components</s> B, C and E <s>F</s></td><td>positively prepared and justified.</td></tr>
<tr><td>MM77</td><td>Schedules 2 and 3</td><td>Table 1: Schedule 2 <s>Areas suitable</s> Priority Areas for waste management
<table>
<tr><th rowspan="2">Area ref</th><th rowspan="2">Area Name</th><th rowspan="2">Size <s>Area</s> (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>
<tr><td>A12-EN</td><td>Eley’s Estate</td><td>26.1</td><td>Enfield</td><td>X</td><td>X</td><td>X</td><td>X</td><td>X</td></tr>
<tr><td>A15-HC</td><td>Millfields LSIS</td><td>1.48</td><td>Hackney</td><td></td><td></td><td><s>X</s></td><td></td><td>X</td></tr>
<tr><td>A19-HR</td><td>Brantwood Road</td><td>16.9</td><td>Haringey</td><td>X</td><td></td><td></td><td>X</td><td>X</td></tr>
<tr><td>A21-HR</td><td>North East Tottenham</td><td>15.32</td><td>Haringey</td><td>X</td><td></td><td></td><td>X</td><td>X</td></tr>
<tr><td>A22-HR</td><td>Friern Barnet Sewage Works/ Pinkham Way</td><td>5.95</td><td>Haringey</td><td>X</td><td>X</td><td></td><td></td><td>X</td></tr>
<tr><td>A24-WF</td><td>Argall Avenue</td><td>26.91</td><td>Waltham Forest</td><td>X</td><td>X</td><td></td><td></td><td>X</td></tr>
</table>
Table 2: Schedule 3 <s>Areas</s> Priority Areas identified in LLDC Local Plan</td><td>Corrects an error</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><th rowspan="2">Area ref</th><th rowspan="2">Area Name</th><th rowspan="2">Size
<s>Area</s>
(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>LLDC1-HC</td><td>Bartrip Street</td><td>0.6</td><td>Hackney</td><td>X</td><td></td><td></td><td></td><td>X</td></tr>
<tr><td>LLDC2-HC</td><td>Chapman Road (Palace Close)</td><td>0.33</td><td>Hackney</td><td>X</td><td></td><td></td><td></td><td>X</td></tr>
<tr><td>LLDC3-WF</td><td>Temple Mill Lane</td><td>2.1</td><td>Waltham Forest</td><td>X</td><td>X</td><td></td><td></td><td>X</td></tr>
</table>
</td><td></td></tr>
<tr><td></td><td>Table 13</td><td>
Table 13: Key to Waste Management Facility Type
<table>
<tr><th></th><th>Facility type</th></tr>
<tr><td>A</td><td>Recycling</td></tr>
<tr><td>B</td><td>Composting (including indoor / in-vessel composting)</td></tr>
<tr><td>C</td><td>Integrated resource recovery facilities / resource parks</td></tr>
<tr><td>D</td><td>Waste recovery or treatment facility (including thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment)</td></tr>
<tr><td>E</td><td>Waste transfer</td></tr>
</table>
</td><td></td></tr>
<tr><td>MM78</td><td>9.11 [rearranged]</td><td>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 <s>areas</s> 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 wishing to provide additional waste capacity on a new site in North London are required to demonstrate that no land is available or suitable</td><td>These modifications are required to ensure clarity about how</td></tr>
</table>

Reference	Section	Further modification	Justification
		in Priority Areas outside of Enfield before considering the Priority Area identified within the Borough. This applies to additional capacity only and not to the expansion or intensification of existing waste sites or providing compensatory capacity for sites already in Enfield. The exception to this sequential approach to site search 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.	Spatial Principle B is delivered and demonstrate that the Plan is positively prepared and justified.
AM	9.12	The NLWP data study has identified capacity gaps for waste management during the plan period for the preferred option of net self-sufficiency **(in line with STRATEGIC OBJECTIVE 3)**. The purpose of Policy 2 is to ensure that sufficient land is identified to accommodate built waste management facilities to deal with these identified capacity gaps for North London **(in line with STRATEGIC OBJECTIVE 2)**.	Contributes to consistency, clarity and/or correct errors
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	These modifications are required to ensure clarity about

Reference	Section	Further modification	Justification
		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.**	how the Plan has identified sufficient land for future waste management facilities in North London and demonstrate that it is positively prepared and justified.
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 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.**	These modifications are required to ensure clarity about how

Reference	Section	Further modification	Justification
			monitoring will support the delivery of the Plan
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.	These modifications are required to provide clear direction for developers
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**.	These modifications are required to clarify the purpose of Priority Areas

Reference	Section	Further modification	Justification
AM	9.17	The NLWP recognises that currently emerging or unknown waste management technologies, not listed in Table 13 'Key to Waste Facility Types', may be proposed ~~on allocated sites and within identified areas~~ during the plan period as new ways of treating waste come to the fore. As with all proposals, those for waste management technologies not listed will be assessed against the relevant NLWP policies, policies in the London Plan, Borough Local Plan policies and related guidance.	Contributes to consistency, clarity and/or correct errors
	Table 13	[Moved to after Schedule 3]	
AM	9.18	A full assessment of the suitability of the ~~area~~ **Priority Area** for a facility type should be prepared by the developer to inform any development application for waste use. This will allow for a more detailed analysis and consideration of potential impacts associated with a specific proposal at the planning application stage.	Contributes to consistency, clarity and/or correct errors
AM	9.20	9.20 It is not within the remit of the NLWP to directly allocate sites/areas within the London Legacy Development Corporation (LLDC) planning authority area; this falls to the LLDC Local Plan. Therefore Schedule ~~4~~ **3** sets out separately those ~~areas~~ **Priority Areas** identified in the LLDC Local Plan as being potentially suitable for built waste management facilities.	Contributes to consistency, clarity and/or correct errors
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;	These modifications are required to ensure clarity about how

Reference	Section	Further modification	Justification
		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; 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**	Spatial Principle B is delivered and demonstrate that the Plan is positively prepared and justified.
AM	9.22	The ~~site~~ search process for suitable potential locations for waste facilities has been extensive, thorough, and subject to public consultation, Equality Impact Assessment (EQIA), Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA). **The Priority Areas identified in Schedules 2 and 3 meet the requirements of the Spatial Principles.** However, there remains a possibility that sites not identified in the plan i.e. windfall sites may be brought forward by operators or landowners for waste development over the plan period.	Contributes to consistency, clarity and/or correct errors
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**	These modifications are required to ensure clarity about how Spatial

Reference	Section	Further modification	Justification
		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 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.	Principle B is delivered and demonstrate that the Plan is positively prepared and justified.
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 to demonstrate that the spatial principles set out in chapter 4 have been considered, and**	These modifications are required

Reference	Section	Further modification	Justification
		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~~.	to ensure clarity about how Spatial Principle B is delivered and demonstrate that the Plan is positively prepared and justified.
AM	9.25	Proposals for waste development on windfall sites should be in line with the London Plan, the NLWP, and Local Plans adopted by the North London boroughs. Proposals for waste facilities on windfall sites will need to demonstrate compliance with the same planning and spatial **assessment** criteria (Table 10, section 8) used for the identification of sites and areas in the NLWP, and any other relevant material considerations, including the assessment criteria as set out within policy 5. The windfall sites policy has been developed to ensure that any unplanned development contributes positively to future waste capacity in the plan area while not undermining the approach to development set out in the NLWP, the London Plan and Local Plans. Any waste development brought forward on a windfall site must meet the same high level of sustainability as the ~~areas~~ **Priority Areas** identified through the site selection process.	Contributes to consistency, clarity and/or correct errors

Reference	Section	Further modification	Justification
AM	9.26	Applications for waste developments on windfall sites will need to demonstrate how the application supports delivery of the NLWP and assists in the aim of net self-sufficiency **(STRATEGIC OBJECTIVE 3)** by providing capacity that addresses the requirements of North London to manage more of its own waste or in providing replacement capacity for an existing facility which has been displaced. In line with the aim and objectives of the plan, planning applications will need to demonstrate that there will be social, economic and environmental benefits from the development and that amenity will be protected **(STRATEGIC OBJECTIVE 5)**.	Contributes to consistency, clarity and/or correct errors
AM	9.27	Historically, waste development has been concentrated within the east and west of North London. Policy 3 provides an opportunity to develop a wider network of sites across the area, in line with the Spatial **Principles** ~~Framework~~. This policy allows new sites to come forward across the area where demand and commercial opportunity arise helping to provide a wider spread of facilities across the plan area in future.	Contributes to consistency, clarity and/or correct errors
AM	9.31	**STRATEGIC OBJECTIVE 1 seeks to support movement of North London's waste as far up the waste hierarchy as practicable.** The test of whether the proposed operations are acceptable in terms of the waste hierarchy will be based on the type of waste and the treatment proposed and demand.	Contributes to consistency, clarity and/or correct errors
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.	These modifications are required to ensure clarity about the

Reference	Section	Further modification	Justification
		This policy helps meet strategic objectives SO1, SO2 and SO3 This policy contributes towards Spatial ~~Framework~~ **Principles** ~~components~~ **A and** B	need for RRCs
AM	9.32	Re-use & Recycling Centres (RRCs) provide members of the public with access to a wider range of recycling facilities and they also deal with bulky items. There are currently **eight** ~~nine~~ RRCs in North London of which **seven** ~~eight~~ are the responsibility of the North London Waste Authority (NLWA). They are safeguarded for waste use under Policy 1. The NLWA has identified areas of deficiency in coverage in parts of Barnet and Enfield and is seeking to address this by providing new or replacement sites so that 95% of residents live within two miles (measured as a straight line) of a facility - see Figure 7 in Section 4. The NLWA is also proposing a new RRC on the Edmonton EcoPark site as part of its current Development Consent Order (DCO) application on the site. The Spatial **Principles** ~~Framework~~ seeks a network of waste sites across North London and, as part of this aim, to ensure residents have good access to RRCs where there is an identified need.	Contributes to consistency, clarity and/or correct errors
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.	These modifications are required to ensure clarity about the site search for RRCs
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:	These modifications are required

Reference	Section	Further modification	Justification
		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;** 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**	to ensure the NLWP is consistent with national policy and the London Plan.
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,**	These modifications are required

Reference	Section	Further modification	Justification
		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.**	to ensure the NLWP is consistent with national policy, the London Plan and clarifies how the policy delivers the Strategic Objectives.
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 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.**	These modifications are required to ensure the NLWP is consistent with the

Reference	Section	Further modification	Justification
			London Plan
AM	9.35	Waste facilities can be separated into 'enclosed' facilities, where waste is processed inside a building and 'open' facilities, which largely deal with waste in the open air. Waste facilities are often seen as bad neighbours, due to problems associated with open air facilities. It is current best practice that the operations are carried out within a covered building enclosed on all vertical sides with access and egress points covered by fast acting doors which default close in order to minimise local public health and environmental impact. Such enclosed facilities are similar in appearance to modern industrial shed developments such as factories or logistics facilities ~~and it is this type of facility that is the focus of the NLWP site allocations~~. 'Open' facilities are unlikely to be suitable for North London as outlined in the section 3 of the Plan except in exceptional circumstances. There are types of waste development for specific waste streams or waste types that may not need to or should not be enclosed but any activity likely to cause dust should be carried out within a building or enclosure. Enclosing waste management facilities not only results in less dust and particulate pollution but will also reduce the risk of pollution caused from other amenity issues such as noise, pests and odour. Noise, vibration, dust, litter, vermin, odours, air and water-borne contaminants, other emissions and their potential health impacts have been a major concern raised through public consultation. However, well sited, and well managed facilities should not cause harm or disturbance. Details of controls for emissions (including bio aerosols) from the site need to be supplied with the application. Planning conditions and section 106 agreements will be used to secure measures to address any issues where necessary and where control is not already exercised through other consent regimes (i.e. the requirement for environmental permits, which is assessed by the Environment Agency). Applicants will be expected to comply with Borough policies on contaminated land. The North London boroughs require that any development can safely complement surrounding uses.	Contributes to consistency, clarity and/or correct errors
AM	9.36	The North London boroughs expect well controlled and well-designed waste facilities capable of fitting in with surrounding land uses and acting as good neighbours. Where development is proposed close to residential areas, in line with **STRATEGIC OBJECTIVE 4 and** the agent of change	Contributes to consistenc

Reference	Section	Further modification	Justification
		principle, the design must incorporate noise reduction measures as well as dust and odour suppression as necessary. It should be designed to minimise its impact on the local area and ensure it is compatible with existing surrounding land uses. When assessing planning applications for waste uses, in addition to Policy 5, the boroughs will also have regard to the criteria in Appendix B of the NPPW and relevant London Plan and Local Plan policies. Applicants are required to submit sufficient information to enable the waste planning authority within which the subject site falls to assess the potential impact of the development proposal on all interests of acknowledged importance. Applicants are encouraged to contact the relevant borough prior to submitting a planning application to discuss relevant matters. Where new waste development is being sited near existing waste sites, developers will be expected to consider potential cumulative impacts as well as also demonstrating any possible benefits of co-locating waste development **(in line with Spatial Principle C)**. Good design is fundamental to the development of high quality waste infrastructure and**, to deliver STRATEGIC OBJECTIVE 4,** the North London boroughs seek approaches that deliver high quality designs and safe and inclusive environments. The documents submitted in support of the planning application should set out how the development takes on board good practice such as the Defra/CABE guidance on designing waste facilities . The supporting documents should set out how the siting and appearance complements the existing topography and vegetation. Materials and colouring need to be appropriate to the location. The development should be designed to be in keeping with the local area and include mechanisms for reducing highway deposits , noise and other emissions where necessary.	y, clarity and/or correct errors
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**	These modifications are required to ensure the NLWP is consisten

Reference	Section	Further modification	Justification
		~~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.	t with national policy
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.**	These modifications are required to clarify the Plan's approach to sustainable transport
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,	These modifications are required to clarify the Plan's

Reference	Section	Further modification	Justification
		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.**	approach to sustainable transport
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 **in line with the Mayor's Vision Zero Action Plan,** 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.**	These modifications are required to clarify the Plan's approach to sustainable transport
AM	9.43	Sustainable design, construction and operation of waste management development will be assessed against relevant ~~borough Local~~ **Development** Plan policies. **In line with STRATEGIC OBJECTIVE 6,** consideration should be given to how the development contributes to the mitigation of and adaption to climate change, promotes energy and resource efficiency during construction and operation with the aim of developments being carbon neutral, the layout and orientation of the site and the energy and materials to be used. Developments should achieve the highest possible standard under an approved sustainability metric such as BREEAM or CEEQUAL in line	Contributes to consistency, clarity and/or correct errors

Reference	Section	Further modification	Justification
		with the relevant borough's policies. Information supplied should enable the borough in question to assess the proposal against relevant planning policies by clearly setting out how the application complies with sustainable design and construction policies and guidance including measureable outputs where appropriate. Where appropriate, production of a site waste management plan should be provided prior to the commencement of construction of the development.	
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.** […]	These modifications are required to ensure the NLWP is consistent with national policy
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 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	These modifications are required to ensure the NLWP is consistent with national policy

Reference	Section	Further modification	Justification
		(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.	
AM	9.49	~~Developers of waste facilities should at the time they submit their planning application be engaged with the Environment Agency and hold or be in the process of applying for appropriate permits from the Environment Agency as the contemporaneous consideration of planning and environmental permit enables the application to be considered in the round.~~	Contributes to consistency, clarity and/or correct errors
AM	9.54	As stated throughout this document applications will be assessed against the full suite of relevant national, London Plan and Local Plan policies and guidance. However, given the status of the NLWP as a multi-Borough DPD which will form part of the Local Plan of each of the seven Boroughs, Policy 5 is a valuable signpost to impacts that will be considered in the determination of applications **and will help deliver STRATEGIC OBJECTIVE 5 which seeks to ensure the delivery of sustainable waste development within the Plan area through the integration of social, environmental and economic considerations.**	Contributes to consistency, clarity and/or correct errors
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 developments **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.	These modifications are required to ensure the NLWP is consistent with the London Plan

Reference	Section	Further modification	Justification
		~~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.~~ This policy helps meet strategic objectives SO1 and SO6 This policy contributes towards Spatial ~~Framework~~ **Principles** ~~component~~ D	
AM	9.57	Tackling climate change is a key Government priority for the planning system and a critical new driver for waste management. The purpose of this policy is to ensure that applications for waste management facilities incorporate opportunities for sustainable energy recovery and combined heat and power (CHP) where feasible and practicable. **The policy helps deliver STRATEGIC OBJECTIVE 6 to provide opportunities for North London to contribute to the development of a low carbon economy and decentralised energy.** The policy complements more detailed policies in borough Local Plans on financial contributions relating to feasibility, sustainable design, CHP and development of heat networks, against which applications will also be considered.	Contributes to consistency, clarity and/or correct errors
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.**	These modifications are required to ensure the NLWP is consistent with the London Plan

Reference	Section	Further modification	Justification
AM	New after 9.61	**The Boroughs will monitor the success of this policy through Monitoring Indicator IN8 which is the number of new CHP facilities serving district heat networks in which the principal fuel source is residual waste or recovered waste fuel.**	Contributes to consistency, clarity and/or correct errors
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	These modifications are required to ensure the NLWP is consistent with national policy
AM	9.62	Waste Water Treatment Works in North London are operated by Thames Water, with the main facility being Deephams Sewage Treatment Works (STW), which is the ninth largest in England. ~~Deephams STW serves a Population Equivalent (PE) of 891,000 (as at 2011).~~ Works to Deephams STW **to** ~~are planned to commence in 2018 Providing~~ **provide** sufficient capacity to meet Thames Water's projections of future requirements into the next decade **were largely constructed by March 2017 and being completed during 2018/2019. The upgrade increased capacity from a Population Equivalent (PE) of 891,000 (as at 2011) to 989,000 PE. At the time the Upgrade was designed (in line with population predictions at the time) it was envisaged the Upgrade will accommodate population growth up until at least 2031. However, treatment capacity will be**	Contributes to consistency, clarity and/or correct errors

Reference	Section	Further modification	Justification
		reviewed in future AMP periods to ensure ongoing capacity in relation to changing population growth predictions.	
AM	9.63	The Environment Agency has issued a significantly tighter environmental permit that came into force in March 2017 and **required** ~~requires~~ Thames Water to make improvements to the quality of the discharged effluent. The need for an effluent upgrade to Deephams STW is highlighted in the National Planning Statement on Waste Water, and planning permission for this work3 was granted by Enfield Council in 2015. The site is to be retained for waste water use and Thames Water anticipates that the approved **recent** upgrade to Deephams STW will provide sufficient effluent treatment capacity to meet their needs <u>into the next decade</u> ~~during the plan period~~.	Contributes to consistency, clarity and/or correct errors
AM	New after 9.65	**The Boroughs will monitor the success of this policy through Monitoring Indicator IN9.**	Contributes to consistency, clarity and/or correct errors
MM100	Policy 8	Policy 8: ~~Control of~~ Inert Waste **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~~ <u>R</u>estoring 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	These modifications are required to ensure the NLWP is consistent with the waste hierarchy

Reference	Section	Further modification	Justification
		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 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**	These modifications are required to ensure the NLWP is consistent with the

Reference	Section	Further modification	Justification
		always be viewed as a waste once it has become a controlled waste outside of the Definition of Waste Code of Practice.	London Plan
AM	9.69	Inert waste will continue to be deposited to land where it is reused for beneficial purposes, including within engineering schemes, for the restoration of mineral workings, and for agricultural improvement. Recycling and recovery are the preferred methods of management and inert waste should only be disposed of to land as a last resort, consistent with the waste hierarchy **(see STRATEGIC OBJECTIVE 1)**.	Contributes to consistency, clarity and/or correct errors
AM	10.1	The Planning and Compulsory Purchase Act (2004) requires planning authorities to monitor and report annually on whether the Aims and Objectives of all local plans (whether prepared individually or in conju**n**ction with other authorities) are being achieved (paragraph 35). The NPPW identifies the need to monitor and report on the take-up of ~~allocated~~ sites ~~and areas~~ **in Priority Areas**; changes in the available waste management capacity as a result of closures and new permissions; and the quantities of waste being created locally and how much is being managed at different levels in the waste hierarchy i.e. recycling/composting, recovery, and disposal.	Contributes to consistency, clarity and/or correct errors
AM	10.2	Monitoring is also required to check on whether the intending policy outcomes of the NLWP are being delivered and whether the identified capacity gaps are being met through the allocated ~~areas~~ **Priority Areas** listed in Policy 2 **Schedules 2 and 3**. Monitoring will also ensure that sufficient identified land remains available for new facilities during the plan period which is also likely to see intense competition for land for other uses especially housing. The results of monitoring will also play an important role in informing Development Management decisions when authorities determine planning applications for new waste facilities.	Contributes to consistency, clarity and/or correct errors
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**.	These modifications are required to clarify how the

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td></td><td></td><td></td><td>plan is supported by monitoring</td></tr>
<tr><td>AM</td><td>10.4</td><td>10.4 To supplement the boroughs' annual monitoring, it will be important for the GLA to monitor London Plan waste Policies ~~5.16 and 5.17~~ and gather data in partnership with the boroughs on waste arisings, waste management capacity, both within London and landfill outside of London.</td><td>Contributes to consistency, clarity and/or correct errors</td></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)~~

~~11. Number of developments permitted which include~~</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~~</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</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~~</td></tr>
</table>
</td><td>These modifications are required to monitor if the NLWP is effective and to link the monitoring to the revised Tables in chapters 5-6.</td></tr>
</table>

Reference	Section	Further modification					Justification
			~~disposal of inert waste to land~~	~~with the waste hierarchy~~	specified in the NLWP % waste diverted and % landfilled	~~outcome for the principal waste streams~~ ~~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, 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)~~	**Capacity to meet net self-sufficiency targets in Tables 6 and 8** Zero loss **of capacity** Replacement ~~locally,~~ within ~~the Borough,~~ North London ~~or~~ <u>London</u>	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	**To check that capacity is increasing to meet net self-sufficiency targets** ~~Ensure sufficient capacity of the right type is available throughout the plan period~~	

Reference	Section	Further modification					Justification
			~~4. Loss of existing waste capacity and provision of replacement capacity~~	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 line with Table 7: land take requirements~~	Policy 2: Area allocations Policy 3: Unallocated sites Policy 4. Reuse and Recycling Centres Policy 7 Waste Water Treatment Works and Sewage Plant Policy 8 Control of Inert Waste	Ensure that capacity is replaced locally unless **net self-sufficiency has been met** ~~valid planning reasons are provided for not doing so.~~	
		IN3	**Location of new waste facilities and compensatory capacity** ~~1. Amount of Land within identified areas or on windfall sites brought~~	**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	To check that identified sites and areas are being taken up as anticipated. **To monitor if land within**	

Reference	Section	Further modification					Justification
			~~forward for waste use during the plan period.~~		Policy 3: Unallocated sites	**Schedules 1, 2 and 3 is not available or suitable 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.	
		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**	**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**	

Reference	Section	Further modification					Justification
			through non-road options (where known).				
		IN6	**Enforcement action taken against waste sites by the local authority and/or Environment Agency on breach of planning conditions or environmental permit** ~~7. Number of approvals for new waste facilities which meet legislative requirements~~	**Zero** ~~100%~~	SO5 (sustainability) SO8 (protect the environment) Spatial **Principles** ~~framework~~ (Reduce impact on amenity) Policy 5: Assessment Criteria for waste management facilities and related development	**To ensure sites do not cause harm to the environment or local communities** ~~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	
		IN8	~~8.~~ Number of new CHP facilities serving district heat	Monitor only	Strategic Aim (green London)	Monitor only	

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td></td><td>networks in which the principal fuel source is residual waste or recovered waste fuel</td><td></td><td></td><td></td></tr>
<tr><td>IN9</td><td><s>9.</s> Sufficient infrastructure in place for management of waste water</td><td>Monitor only – information to be obtained from Thames Water</td><td>Strategic Aim (capacity supply and self-sufficiency)
SO5 (sustainability)</td><td>To ensure that Thames Water have sufficient capacity to management the levels of waste water generated in Noth London over the plan period</td></tr>
</table>
</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 rowspan="2">Local planning authorities (including London Legacy Development Corporation)</td><td>Apply Plan policies</td><td>Assessing suitability of applications against Plan policies and priorities

Deliver the strategic objectives and policies of the NLWP alongside wider development and regeneration objectives</td></tr>
<tr><td>Regulate / monitor</td><td>Inspect operating waste sites periodically</td></tr>
</table>
</td><td>These modifications are required to monitor if the NLWP is effective and to link the monitorin</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td></td><td></td><td>Appoint a lead borough to monitor the plan and carry out the duty to co-operate when required

Publish annual monitoring reports in the NLWP

<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>g to the revised Tables in chapters 5-6.</td></tr>
<tr><td>MM105a</td><td>Schedule 1</td><td><s>Table 1:</s> Schedule 1: Existing safeguarded waste sites in North London
<table>
<tr><th>Site ID</th><th>Site Name</th><th>Site Address</th><th>Waste Stream</th><th>Managed Waste</th><th>2012</th><th>2013</th><th>2014</th><th>2015</th><th>2016</th><th><s>Borough</s></th></tr>
<tr><td>BAR 1</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</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><s>Barnet</s></td></tr>
</table>
</td><td>These modifications are required to correct referencing errors and provide more information on the existing sites as a basis for</td></tr>
</table>

Reference	Section	Further modification											Justification
				Service Area, M1 Motorway, Mill Hill, London, NW7 3HU									monitoring.
		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	**Civic Amenity**	**LACW**	**X**	**15,612**	**16,361**	**17,206**	**10,584**	**18,237**	~~Barnet~~	

Reference	Section	Further modification											Justification
			and Recycling Centre	**& Waste Recycling Centre, Summers 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											Justification
		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, London, N11 1HJ**	**CDE**	✓ **(72%)**	**14,596**	**29,938**	**29,456**	**31,274**	**10,746**	~~Barnet~~	
		BAR 11	Upside Railway Yard	**Upside Railway Yard, Brent Terrace, Cricklew**	**CDE**	**X**	**0**	**0**	**0**	**0**	**234,930**	~~Barnet~~	

Reference	Section	Further modification										Justification
				ood, London, NW2 1LN								
		CAM 1	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, Middlesex, EN2 9BH**	**C&I**	**X**	**17,466**	**17,124**	**19,231**	**19,507**	**18,427**	~~Enfield~~
		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**	**C&I**	✓	**63**	**63**	**26**	**29**	**37**	~~Enfield~~

Reference	Section	Further modification											Justification
			Motor Salvage Complex	**Complex, Mollison Avenue, Brimsdown, Enfield, Middlesex, EN3 7NJ**									
		~~ENF 4~~	~~Chase Farm Hospital, The Ridgeway (SITA)~~									~~Enfield~~	
		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,**	**C&I / CDE**	**X**	**16,855**	**27,043**	**28,566**	**23,004**	**21,974**	~~Enfield~~	

Reference	Section	Further modification										Justification
				London, N18 3PP								
		ENF 7	**Vacant** **(formerly** Budds Skips) ~~, The Market Compound, Harbert Road~~	**The Market Compound, 2 Harbet Road, Edmonton, London, N18 2HQ**	**C&I / CDE**	**-**	**834**	**802**	**1,778**	**0**	**0**	~~Enfield~~
		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,**	**C&I / CDE**	✓	**9,935**	**-**	**20,359**	**-**	**8,719**	~~Enfield~~

Reference	Section	Further modification											Justification
				Edmonton, London, N18 1SY									
		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 Lane, Chingford**	**CDE**	✓	**236,950**	**232,590**	**241,900**	**216,334**	**206,806**	~~Enfield~~	

Reference	Section	Further modification											Justification
		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 Skip Hire Limited	**Yard 10-12 Hastingwood Trading Estate, Harbet Road, Edmonton, London, N18 3HR**	**C&I**	✓ **(89%)**	**0**	**0**	**9,391**	**16,277**	**10,696**	~~Enfield~~	
		ENF 17	Albert Works~~, Kenninghall Road, Edmonton~~	**Albert Works, Kenninghall Road, Edmonton,**	**C&I**	✓	**193,308**	**224,020**	**233,225**	**211,424**	**-**	~~Enfield~~	

Reference	Section	Further modification										Justification
				London, N18 2PD								
		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, Edmonton, London, N18 3AG**	**LACW**	✓	**32,498**	**32,779**	**35,241**	**32,475**	**33,981**	
			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**	**LACW**	✓	**58,255**	**106,341**	**112,419**	**109,114**	**101,189**	

Reference	Section	Further modification											Justification
				Ecopark, Advent Way, Edmonton, London, N18 3AG									
		~~ENF 19~~	~~London Waste Ltd Composting,~~ ~~Edmonton Eco Park,~~ ~~Advent Way~~		**C&I**	✓ **(59%)**	**85,103**	**69,124**	**64,897**	**77,305**	**88,636**	~~Enfield~~
		~~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											Justification
		ENF 23	J O' Doherty Haulage, Nobel Road, Edmonton	**Pegamoid Site, Nobel Road, Edmonton, London, N18 3BH**	**C&I**	✓ **(59%)**	**85,103**	**69,124**	**64,897**	**77,305**	**88,636**	~~Enfield~~	
		ENF 24	Oakwood Plant Ltd, Edmonton	**Oakwood House, Nobel Road, Eley Industrial Estate, Edmonton, London, N18 3BH**	**C&I / CDE**	✓ **(84%)**	**10,282**	**7,495**	**10,011**	**13,489**	**14,428**	~~Enfield~~	
		ENF 25	Environcom Ltd **(Edmonton Facility)** ~~, Stonehill Business Park, Edmonton~~	**Unit 8a Towpath Road Stonehill Business Park, N18 3QU**	**Hazardous (WEEE)**	✓	**2,447**	**1,327**	**9,194**	**11,400**	**67**	~~Enfield~~	
		ENF 26	Powerday Plant Ltd, Jeffreys Road	**Unit 2, Jeffrey's Road, Brimsdo**	**C&I / CDE**	✓	**27,319**	**18,664**	**43,851**	**23,490**	**49,754**	~~Enfield~~	

Reference	Section	Further modification										Justification
				wn, Enfield, Middlesex, EN3 7UA								
		~~ENF 27~~	~~Edmonton EFW~~								~~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 / CDE**	✓	**0**	**7,150**	**26,545**	**15,501**	**11,337**	
		ENF 31	Volker Highways Ltd	**15 Edison Road, Brimsdown Industrial Estate, Enfield EN3 7BY**	**C&I / CDE**	✓	**-**	**8,892**	**13,652**	**7,344**	**-**	~~Enfield~~
		~~ENF 32~~	~~Guy Lodge Farm~~									~~Enfield~~
		~~ENF 33~~	~~Ballast Phoenix Ltd~~									~~Enfield~~
		~~ENF 34~~	~~London & Metropolitan~~									~~Enfield~~

Reference	Section	Further modification											Justification
			~~Recycling Facility~~										
		ENF 35	**Redcorn (ELV)** ~~Unit 25 Enfield Metal Kingswood Nursery, Theobalds Park road~~	**22a & 24, Stacey Avenue, Montagu Industrial Estate, Enfield, N18 3PS**	**Hazardous (C&I)**	✓	**-**	**-**	**-**	**-**	**6,557**	~~Enfield~~	
		~~ENF 36~~	~~Greenstar Environmental~~									~~Enfield~~	
		ENF37	GBN	**Gibbs Road, Montagu Industrial Estate, London, N18 3PU**	**CDE**	✓							
		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										Justification
				, 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~~
		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	**44 White Hart**	**C&I**	✓	**15,712**	**22,733**	**23,852**	**8,508**	**-**	~~Haringey~~

Reference	Section	Further modification											Justification
			Lane, Tottenham	**Lane, Tottenham, London N17 8DP**									
		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 **Ltd, Brantwood Road** ~~/ Brantwood Auto Recycling Ltd, Willoughby Lane~~	**Brantwood Road, Tottenham, London N17 0ED**	**C&I**	✓	**2,470**	**5,225**	**2,250**	**23,779**	**39,283**	~~Haringey~~	
		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**	**LACW**	**X**	**3,706**	**2,409**	**6,326**	**5,499**	**5,745**	~~Haringey~~	

Reference	Section	Further modification											Justification
				View Road, Tottenham, London, N17 9AY									
		HAR 10	~~LondonWaste Ltd.~~ Western Road **Re-use & Recycling Centre** ~~H W R C~~	**Western Road, Haringey N22 6UG**	**LACW**	**X**	**0**	**0**	**2,526**	**4,851**	**3,799**	~~Haringey~~	
		HAR 11	**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~~	
		WAF 1	**Mercedes Parts Centre**	**21 Chingford**	**C&I**	✓	**0**	**0**	**0**	**0**	**7**		

Reference	Section	Further modification											Justification
				Industrial Estate, Hall Lane, 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~~	
		WAF 5	**Vacant**	**17 Rigg Approac**	**C&I**	✓	**53**	**53**	**81**	**21**	**11**	~~Waltham~~	

Reference	Section	Further modification											Justification
			(previously T J Autos (U K) Ltd)	**h, Leyton, London, E10 7QN**								~~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~~
			WAF 9	**Vacant (formerly B D & G Parts For Rover)**	**Roxwell Trading Park, Leyton**	**C&I**	**-**	**0**	**0**	**0**	**0**	**0**	
			WAF 10	Malbay 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~~	**Unit 1, Staffa Road, E10 7PY**	**C&I**	✓	**0**	**21,537**	**31,603**	**30,378**	**0**	~~Waltham Forest~~

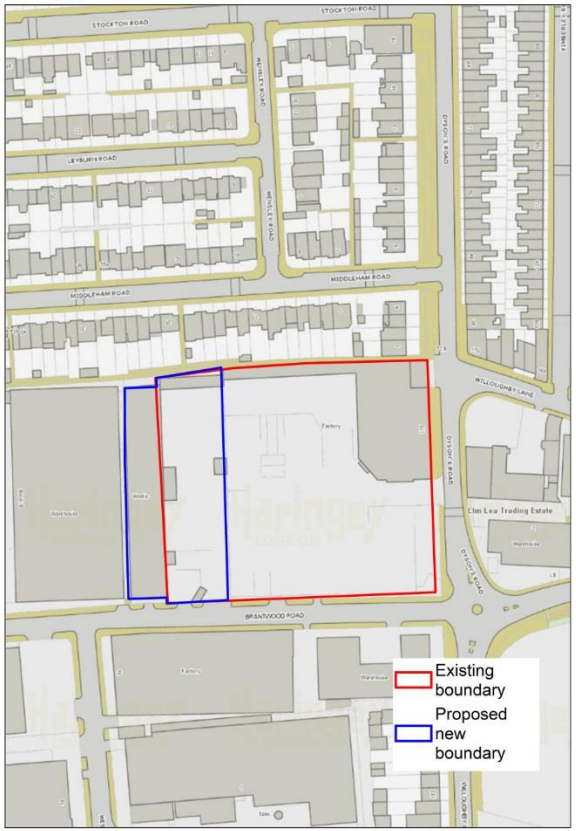
Reference	Section	Further modification	Justification

	~~1 Staffa Road, Leyton~~									
WAF 14	Tipmasters	**15 Rigg Approach London Greater London E10 7QN**	**C&I**	**X**	**0**	**0**	**586**	**2,847**	**3,622**	~~Waltham Forest~~
~~WAF 15~~	~~Bits and Parts~~									~~Waltham Forest~~
WAF 16	**Whipps Cross Hospital Clinical Waste Treatment Facility**	**Whipps Cross Hospital, Whipps Cross Road, London, E11 1NR**	**C&I (clinical)**	**X**	**0**	**0**	**0**	**0**	**5**	

[footnote to BAR3, BAR4, BAR6 and BAR7**]**

These sites will be redeveloped under the ~~approved~~ planning permission for the regeneration of Brent Cross Circklewood (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 a new Waste Transfer Station (WTS) 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 ~~first~~ **early** Southern phase of the BXC regeneration which ~~is anticipated will~~ **has** commence**d; replacement capacity for these sites will be sought in accordance with**

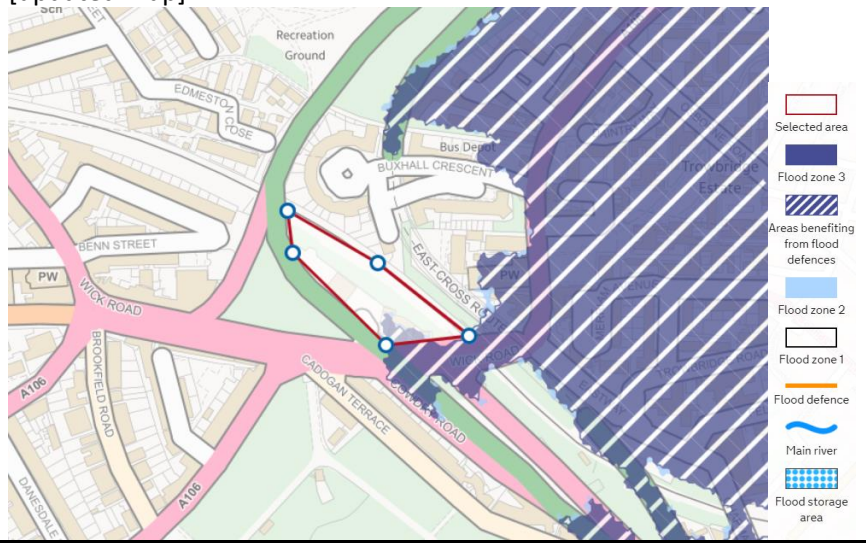
Reference	Section	Further modification	Justification
		the planning permission for Brent Cross Cricklewood. ~~in early 2018. Replacement capacity for these sites will not be provided prior to their redevelopment and therefore replacement capacity will be sought outside of the BXC regeneration area on alternative sites / areas to be identified within the London Borough of Barnet.~~ **The BAR3 site is identified for redevelopment in Phase 4 of the BXC regeneration. It is planned that capacity at the waste facilities of BAR4, BAR6 and BAR7 and part of the capacity of BAR3 will be replaced by the new Waste Transfer Station (WTS) delivered as part of the Brent Cross Cricklewood Regeneration. The balance of the replacement capacity for BAR3 would need to be identified prior to its redevelopment and the London Borough of Barnet will seek to provide replacement capacity within the borough. The Barnet Local Plan will identify potential sites.**	
MM105b	HAR 7	[Revision to safeguarded area for HAR 7 in Haringey's Policies Map]	Update to reflect new information on on location of waste operation on the site.

Reference	Section	Further modification	Justification
			
MM106	Appendix 2: Barnet Area Profiles	A05-BA Connaught Business Centre	These modifications are required

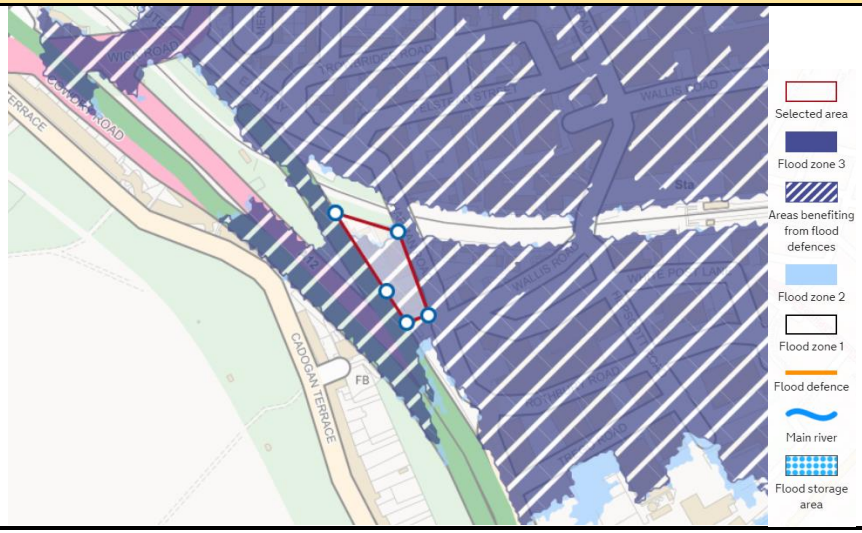
<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td></td><td></td><td><table><tr><td>Historic Environment</td><td><s>No assets identified in vicinity.</s> Within Watling Street Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</td></tr></table></td><td>to ensure the Plan is consistent with national policy</td></tr>
<tr><td>MM107</td><td>Appendix 2: Enfield Area Profiles</td><td>12-EN Eleys Estate, Enfield<table><tr><td>Historic Environment</td><td>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<s>. The potential archaeology value of area should be considered</s> along with the setting of Montagu Road Cemeteries Conservation Area.
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.</td></tr></table></td><td>These modifications are required to ensure the Plan is consistent with national policy</td></tr>
<tr><td>MM108</td><td>Appendix 2: Hackney Area Profiles</td><td>A15-HC Millfields LSIS<table><tr><td>Historic Environment</td><td>There are three Grade II listed buildings adjacent to the west of site:
Hackney Borough Disinfecting Station (on Heritage at Risk Register)</td></tr></table></td><td>These modifications are required to ensure the Plan is</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td></td><td></td><td><table><tr><td></td><td>• Shelter House
• Caretakers Lodge
The Mandeville Primary School which is Grade II listed is situated to the south of the area.
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.</td></tr></table></td><td>consistent with national policy</td></tr>
<tr><td>MM109</td><td>Appendix 2: Hackney LLDC Area Profiles</td><td>LLDC1-HC Bartrip Street<table><tr><td>Flood Risk</td><td><s>Part of the southern area of Bartip St LSIS is within Flood Zone 2 (medium risk) although the area benefits from flood defences.</s>
<s>The area is at risk from surface water flooding.</s>

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 proposed use for the site is considered to be ‘Less Vulnerable’. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.</td></tr></table></td><td>These modifications are required to ensure the Plan is consistent with national policy</td></tr>
</table>

Reference	Section	Further modification	Justification
		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 in the future as a result of climate change with 1% AEP event covering a greater extent of the site. 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 site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.** **Part of the site area benefits from existing flood defences.** [updated map] 	
MM110	Appendix 2: Hackney	LLDC2-HC Chapman Road (Palace Close)	These modifications are

Reference	Section	Further modification		Justification
	LLDC Area Profiles	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 proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. 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 in the future as a result of climate change 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 site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.** **The majority of the site area benefits from existing flood defence.** [updated map]	required to ensure the Plan is consistent with national policy

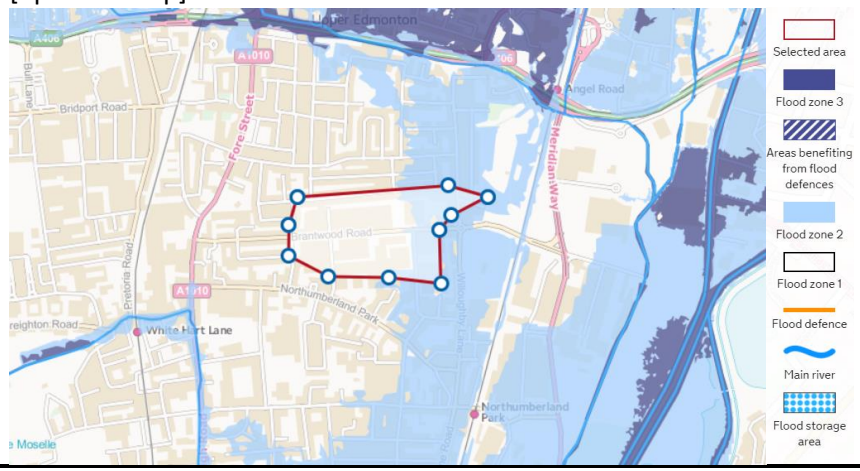
<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td></td><td></td><td><table><tr><td></td><td> 
</td></tr></table></td><td></td></tr>
<tr><td>MM111</td><td>Appendix 2: Haringey Area Profiles</td><td>A19-HR Brantwood Road

<table><tr><td>Flood Risk</td><td><s>The eastern section of the area lies within Flood Zone 2 (medium probability of flooding).</s>
<s>The area is at risk from surface water flooding.</s>

The site area is largely Flood Zone 1 with the western most part of the site area falling partially within Flood Zone 2. The proposed use for the site is considered to be ‘Less Vulnerable’. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.

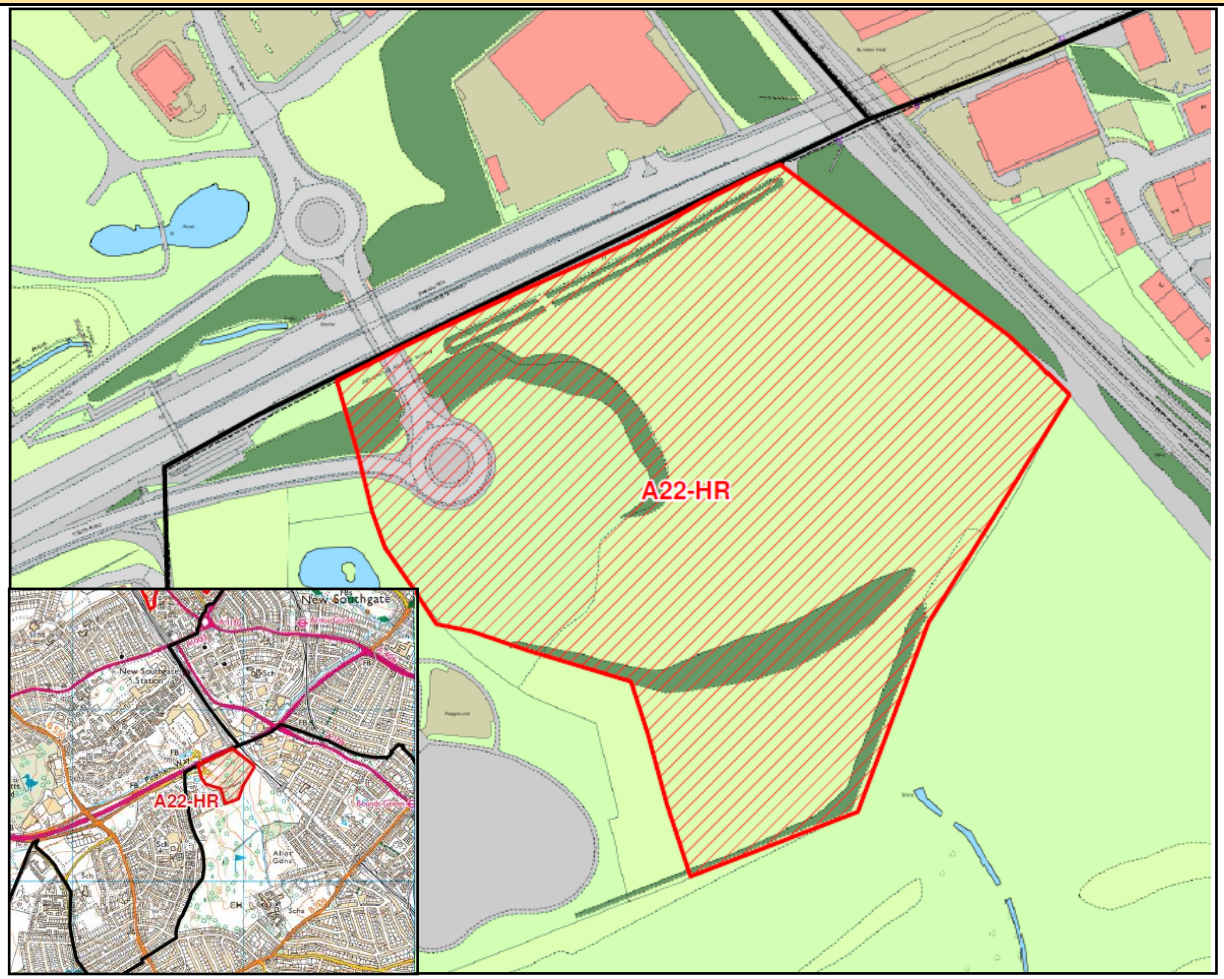
The site area is shown to flood from the Pymmes Brook in the 0.1% AEP event (without defences) and this will increase in the future as a result of climate change with 1% AEP event to cover approximately one quarter of the site area.</td></tr></table></td><td>These modifications are required to ensure the Plan is consistent with national policy</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td></td><td>A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.

[updated map]
 
</td></tr>
</table>
</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> 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.</td></tr>
</table>
</td><td>These modifications are required to ensure the Plan is consistent with national policy</td></tr>
</table>

Reference	Section	Further modification	Justification
MM113	Appendix 2: Haringey Area Profiles	A22-HR Pinkham Way **A22-HR – Friern Barnet Sewage Works (LEA 4) /Pinkham Way, Haringey**	These modifications are required to ensure the Plan is consistent with national policy and address community concerns about the loss of biodiversity and flood risk

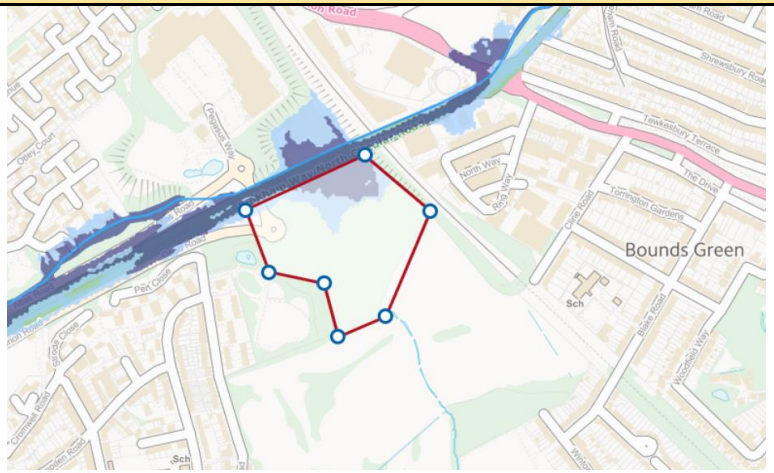
Reference	Section	Further modification	Justification
		 © Crown Copyright and database right (2016). Ordnance Survey 100021551	
		Area Details	

Reference	Section	Further modification		Justification
		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.	

Reference	Section	Further modification		Justification
		Relevant Local Plan Policy	**Former Friern Barnet Sewage Works / Pinkham Way Area has the following planning designations on the site: Site of Importance for Nature Conservation Grade 1, Local Employment Area: Employment Land, Flood Zone 2 and 3 (part).** **The area is subject to the following key Local Plan policies: - SP13: Open Space and Biodiversity, DM 20: Open Space and Green Grid, SP8: Employment, DM 37: Maximising the Use of Employment Land and Floorspace, and DM 24: Managing and Reducing Flood Risk** ~~The Area is subject to Local Plan policy SP8: Employment.~~ ~~Friern Barnet site falls within the Borough's Specific Proposal 5, Employment generating uses subject to no adverse effect on the nature conservation value of the site.~~ ~~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.	

Reference	Section	Further modification		Justification
		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 an area to the north of the ~~site~~ Area falling partially within Flood Zones 2 and 3. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. 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 as a result of climate change with 1% AEP event covering a greater extent of the ~~site~~ Area.** **A site specific flood risk assessment will therefore be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.** [updated map]	

Reference	Section	Further modification	Justification
			

Reference	Section	Further modification		Justification
		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	

Reference	Section	Further modification		Justification
		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.**	

Reference	Section	Further modification		Justification
			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 and Barnet has no current plans to develop a waste facility, this is likely to impact on the deliverability of the site in its entirety. A smaller part of the site area in NLWA's single ownership is therefore most likely to accommodate any development. The location of new development within the Area will be assessed against flood risk criteria in the NPPF and a site-specific flood risk assessment will be required. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere** **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.**	

Reference	Section	Further modification		Justification
			Any new waste facility in this Preferred Location 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. Consultation with the local community will be required for any proposed waste facility on this site. **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.**	

Reference	Section	Further modification		Justification
			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.~~ Provision of an acceptable access ~~of~~ **from** Orion Road Roundabout would be required.	

Reference	Section	Further modification		Justification
			Any application should demonstrate how public access to the remainder of the Area could be achieved. **The Muswell Hill Golf Course Brook runs in culvert through the Pinkham Way Priority Area. Opening up the watercourse could bring multiple flood risk, biodiversity and amenity benefits and should be given consideration as site-specific development proposals are advanced.** **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 **fall within flood Zone 2 and 3** ~~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.~~	

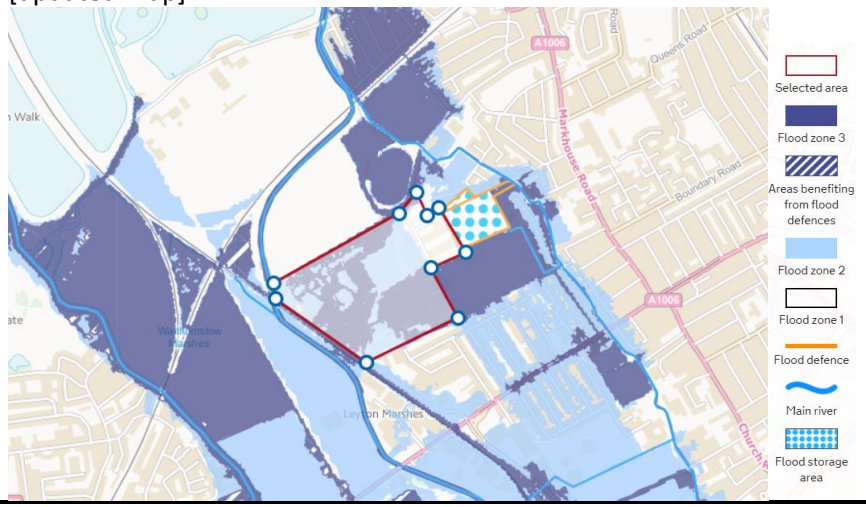
<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Justification</th></tr>
<tr><td>MM114</td><td>Appendix 2: Waltham Forest Area Profiles</td><td>A24-WF Argall Avenue

<table><tr><td>.Historic Environment</td><td><s>No assets identified in vicinity</s><u>. 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.</u></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.
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. The proposed use for the site is considered to be ‘Less Vulnerable’. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding.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.

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 as a result of climate change with 1% AEP event covering a greater extent of the site area.</td></tr></table></td><td>These modifications are required to ensure the Plan is consistent with national policy</td></tr>
</table>

Reference	Section	Further modification	Justification
		A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission. **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] 	
MM115	Appendix 2: Waltham Forest	LLDC3-WF Temple Mill Lane	These modifications are required

Reference	Section	Further modification		Justification
	LLDC Area Profiles	**Historic Environment**	~~No assets identified in vicinity.~~ **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.**	to ensure the Plan is consistent with national policy
		Flood Risk	~~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).~~ ~~Environment Agency – Facilities within Flood Zone 3 should only deal with inert waste unless otherwise agreed with the Environment Agency.~~ **The site area is largely Flood Zone 2 with a small area of Flood Zone3. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. 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 as a result of climate change with 1% AEP event covering a greater extent of the site area.** **A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.** **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,**	

Reference	Section	Further modification		Justification
			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] 	