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Main Modifications

Sustainability Appraisal Addendum Report

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Quality Management

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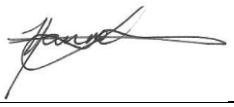
Checked By	Hanne Larsson	**Signature**	
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P01	07.09.2020	Draft for review	M Gibson	H Larsson	M Cotton
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1. Introduction

1.1 This Sustainability Appraisal (SA) addendum report assesses the proposed Main Modifications to the Proposed Submission North London Waste Plan (NLWP), following examination in public (EiP) in November 2019. The Main Modifications are amendments required to the plan in order to ensure legal compliance and soundness. This addendum has been produced to assess the impact of the Main Modifications on the policies and supporting text as previously appraised. This addendum should be read in conjunction with the Proposed Submission SA Report (2019) and accompanying appendices.

1.2 The NLWP and all associated documents, including the SA Report, were submitted to the Secretary of State for Communities and Local Government on 8th August 2019 for independent examination. Hearing sessions were held on 20th November and 21st November 2019 to consider the Duty to Co-operate and Legal Issues (Main Matter 1), Aim and objectives for Waste Development (Main Matter 2), the Spatial Framework for Waste (Main Matter 3), Future Waste Management Requirements (Main Matter 4), policies (Main Matter 5) and Monitoring and Implementation (Main Matter 6). Following the hearing sessions, the North London Boroughs prepared a Schedule of Main Modifications to the NLWP.

1.3 SA is an iterative and ongoing process that aims to provide a high-level appraisal of the sustainability of a plan as it evolves. As such, this SA Addendum Report has been produced to set out the findings of further SA work on the Main Modifications (Appendix A). The NLWP SA Objectives were established in the SA Scoping Report (2014). The method and approach for the SA is set out in Section 3 of the Proposed Submission SA Report (2019) submitted alongside the Proposed Submission NLWP. The SA assessment criteria set out in Table 6 of the Proposed Submission SA Report continue to form the basis for this SA work carried out on the Main Modifications and are replicated in Table 2 of this SA Addendum.

1.4 In addition, this addendum contains two further items of assessment work that serve to bring the SA assessment up to date, in line with the NLWP as proposed to be modified. The SA Framework and assessment criteria have been used to conduct an assessment of the 'Options Appraisal for Sites and Areas to be taken forward into the Proposed Submission NLWP' so that the site selection process used is fully reasoned from an SA perspective (Appendix B). This addendum also contains an assessment of the updated capacity strategy options so that the SA assessment of the strategic approach for the NLWP reflects the current situation (Appendix C).

1.5 The Main Modifications and this SA Addendum (published October 2020) were consulted on in October-December 2020. This addendum, including the SA assessment in Appendix A, has now been updated (March 2021) to include changes made to the Main Modifications as a result of comments received during the consultation.

1.6 The structure of this document is as follows:

a. Issues Raised at Examination and during consultation on the Main Modifications – a brief summary of the matters raised during discussion at the public hearings

b. SA Methodology & SA Framework – recap of how the Sustainability Appraisal is undertaken and its assessment criteria

c. Summary & Conclusion – discussion about the assessment of the Main Modifications as well as other assessments undertaken in light of the Boroughs' approach to the Inspector's comments

d. Appendices – detailed information regarding the assessments undertaken in response to the Inspector's comments

2. Issues raised at Examination and Consultation on the Main Modifications

2.1 Discussion at the NLWP public hearings held in November 2019 indicated a need for greater clarity in the NLWP about how information and data is presented so that the reader can more readily follow the line of justification and reasoning behind the approach to waste management in North London.

2.2 In particular, these related to:

- the structure of the NLWP, especially the link between the spatial principles, the capacity gap and the identification of Areas;
- the presentation of data in chapters 5 and 6 related to how waste is currently managed, future waste arisings, existing capacity and capacity gaps;
- justification for the amount of land identified to meet the capacity gaps; and
- justification for how the land identified is consistent with Spatial Principle B (geographical spread).

2.3 The above matters have been addressed by restructuring the NLWP and redrafting Chapters 5-8, revising the data tables in Chapters 5-7 and adding a criterion to Policy 2. Two additional evidence base documents have been submitted to justify and explain the changes: a Data Study Addendum (July 2020) and an Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP (July 2020). An assessment of the Options Appraisal for Sites and Areas against the SA Framework is provided in Appendix B.

2.4 In addition to the above matters, other points were raised during the examination which have been addressed through changes to the supporting text and one of the Area Profiles. These include:

- how the constraints identified for Pinkham Way limit the potential developable area and how the site can contribute to community aspirations;
- the impact of existing sites on the surrounding area;
- the location of compensatory capacity if net self-sufficiency has been met;
- maximising the capacity of existing sites;
- prominence of the Strategic Objectives;
- legibility of the maps;
- sustainable transport including the use of low emission vehicles; and
- monitoring.

2.5 The Boroughs also took the opportunity to correct any minor errors and update references in the NLWP.

2.6 The Main Modifications were consulted on October-December 2020. Submissions were received from a total of 24 representors. The Boroughs have prepared Responses to each representation made on a Main Modification and have proposed additional changes where appropriate. Details of these responses and proposed changes can be found in the Consultation Report (March 2021).

2.7 Further modifications are proposed as a result of comments received as part of the NLWP Main Modifications consultation. The majority of these are minor in nature and seek to add clarity or correct an error.

2.8 The more substantial modifications include:

- Further explanation on how the Boroughs are planning to meet the Mayor's recycling targets and how these are reflected in the figures;
- An update on the NLWA's timetable for a new joint waste strategy;
- More information for residents on the regulation of waste sites and the process for enforcement action;
- An additional clause in Policy 2 to explicitly state encouragement for the co-location of waste facilities with complementary activities (in line with Spatial Principle C);
- Clarification that the sequential search for sites outside Enfield in the first instance (Policy 2) 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; and
- Improve the description of the most suitable location for development within the Pinkham Way area in light of flood risk and site ownership.

3. SA Methodology

3.1 The appraisal process has considered the degree and type of impact of the plan on each of the SA Objectives (see Section 4). The same qualitative five-point scale used to assess the NLWP against the SA Framework (consulted upon at SA Scoping Stage in 2014) has been used to assess the Main Modifications to the NLWP. The implications of the changes on the conclusions of the Proposed Submission SA Report have been assessed and scored according to this scale. The scale is set out in Table 1 and ranks the effect from major positive to neutral through to major negative, with degrees between. Where the effect is unclear or cannot be assessed a '?' has been used.

Table 1: Criteria for Assessing the Significance of Impacts

Score	Appraisal Category
+ +	Major Positive
+	Positive
0	Neutral
–	Negative
– –	Major Negative
?	Uncertain

3.2 A full assessment of each Main Modification against the SA Framework is contained in Appendix A.

3.3 Appendix A has been updated to reflect any further changes proposed as a result of the consultation on the Main Modifications.

4. SA Framework

Table 2: SA Objectives and Assessment Criteria

SA Objectives		Assessment Criteria
1	To protect people's health, communities and local environmental quality from the adverse effects of waste management.	• Will the plan/proposal have an adverse impact on levels of nuisance including dust, particulate emissions, noise (including traffic noise), vibration, visual amenity and light pollution? • Will it redress environmental inequalities within the plan area?
2	To maintain green infrastructure and open space.	• Will the plan/proposal support the creation of healthier lifestyles through, for example, the provision of new or improved open space? • Will it have an adverse impact on the green infrastructure network? • Will it lead to a loss of open space / reduction in public access?
3	To promote sustainable modes of transport, reduce the need to travel and improve choice and use of more sustainable transport modes.	• Will the plan/proposal reduce overall transport distances for waste? • Will it reduce waste-related car and lorry traffic and increase sustainable transport use? • Will it reduce/increase road congestion?
4	To conserve and enhance the historic environment, heritage assets and their settings.	• Will the plan/proposal have an adverse impact upon heritage assets and/or their setting?
5	To maintain and enhance the quality and character of North London's townscapes and landscapes.	• Will the plan/proposal have an adverse impact on local landscape character or on townscapes? • Will it have an adverse affect on the openness of the Green Belt? • Will it affect areas of public open space? • Will it lead to landscape/townscape improvements? • Will it result in development that is sympathetic to its surroundings?

SA Objectives		Assessment Criteria
6	To maintain, protect and enhance biodiversity, protected species, habitats, geodiversity and features of geological interest.	• Will the plan/proposal have an adverse impact upon protected sites or species? • Will it restore or create new habitat? • Will it lead to the loss of, or impact on the integrity of, BAP habitats or species?
7	To reduce and manage flood risk	• Will the plan/proposal help to avoid inappropriate development in areas at risk of flooding? • Will it exacerbate vulnerability to flooding? • Will the plan reduce flood risk through the use of SUDS? • Will the plan involve the reconfiguration of existing sites or development of a flood alleviation scheme?
8	To adapt to, and reduce the impacts of, climate change.	• Will the plan/proposal help to reduce vulnerability to the impacts of climate change?
9	To reduce contributions to climate change, promote energy efficiency and increase the use of energy from sustainable sources.	• Will the plan/proposal increase emissions of greenhouse gases from waste activities? • Will it reduce emissions of greenhouse gases? • Will it encourage the use and/or production of renewable energy? • Will it reduce waste-related car and lorry traffic and increase sustainable transport use?
10	To protect and improve air quality, water quality and soils.	• Will the plan/proposal have an adverse impact on air quality? • Will it reduce/increase road congestion? • Will the plan/proposal have an adverse impact on surface or ground water quality? • Will it improve existing water quality? • Will the plan/proposal support the remediation of contaminated land? • Will it have an adverse impact on soil quality?
11	To manage waste sustainably, maximise North London's self-sufficiency in the	• Will the plan/proposal minimise the production of waste?

SA Objectives		Assessment Criteria
	management of waste, minimise the production of waste and increase re-use, recycling and recovery rates.	• Will it promote sustainable waste management and encourage movement of waste up the Waste Hierarchy?
12	To ensure the efficient use of land and natural resources and the sustainable management of existing resources.	• Will the plan/proposal make use of previous developed land or buildings? • Will it increase demand for water? • Will it incorporate/encourage measures to ensure water is used efficiently?
13	To encourage sustainable economic growth, exploit the growth potential of business sectors and improve the competitiveness and productivity of the local waste industry.	• Will the plan/proposal encourage sustainable economic growth through provision of adequate waste management facilities? • Will the plan/proposal diversify the economy in terms of the waste management sector? • Will it enable new and innovative waste management technologies to be developed and utilised? • Will it enable maximum value recovery from waste where possible? • Will it promote waste minimisation?
14	To reduce economic disparities, unemployment and deprivation.	• Will the plan/proposal support the creation of a broad range of jobs and employment opportunities?

5. Summary and Conclusion

Main Modifications

5.1 The changes, as detailed in Section 2 of this Addendum, predominantly relate to the structure and clarity of the Proposed Submission NLWP. They aim to ensure that readers of the plan are able to understand how the plan has developed and the evidence base used to justify the policies.

5.2 A full assessment of each Main Modification, including any changes made as a result of comments received during the Main Modifications consultation, is available in Appendix A. The Main Modifications to the NLWP do not significantly impact the conclusions of the Proposed Submission SA Report (2019). The assessments indicate that the changes are likely to have a slightly positive impact overall.

5.3 Updates to flood mapping for the following areas has resulted in a reduction in flood risk and therefore a positive impact on SA Objective 7:

- LLDC1-HC Bartrip Street (Hackney LLDC Area Profiles);
- LLDC2-HC Chapman Road (Palace Close) (Hackney LLDC Area Profiles); and
- LLDC3-WF Temple Mill Lane (Waltham Forest LLDC Area Profiles).

5.4 Other key positive impacts on SA Objectives arise from:

- The addition of criteria to Policies 2 and 3 that require developers to consider sites/areas outside of Enfield first to create a better geographical spread of waste facilities, which will likely decrease the length of waste-related car/lorry trips;
- Additional recommendations/ requirements around the use of sustainable transport, including low emission vehicles; and
- The strengthening of policies with relation to the maximisation of capacity at existing waste sites.

5.5 The majority of the other proposed Main Modifications have been deemed to have no significant impact on the sustainability of the plan, so have been classed as '0 Neutral'.

Options Appraisal for Sites and Areas

5.6 The appraisal of the 5 options in Appendix B was carried out in response to the update of the "Options Appraisal for Sites and Areas to be taken forwards in the Proposed Submission NLWP" document. These options were developed and updated following the Reg 18 consultation in order to strengthen Policy 2 of the NLWP. The options were considered against the SA objectives in order to ensure that when the individual site-specific appraisals were grouped together for reasons of policy development, they did not create unforeseen effects on the SA objectives.

5.7 Each option generally performs well against the SA objectives, and a summary of each is provided below.

5.8 Option 1 considers sites requiring minimal mitigation for waste use, and this ensures it performs well against the SA objective relating to protecting communities as this was

of particular concern during the consultation. However, Enfield accounts for almost all of the sites proposed which does not deliver a better geographical spread of waste facilities as sought by the spatial principles. Option 2 provides the greatest uncertainty on the SA objectives as a whole. This is because it includes larger Band C areas within its site selection and it's not clear what mitigation will be required in order to make those sites more suitable for waste use.

5.9 Option 3 considers only land identified as Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS) within the NLWP area, whereas the other options also include other well-performing industrial/employment land, requiring different levels of mitigation and in a range of sizes when compared to the designated industrial areas option only. However, Enfield accounts for almost all of the sites proposed which does not deliver a better geographical spread of waste facilities as sought by the spatial principles. Options 4 and 5 perform the same against the SA objectives, and overall in a positive manner, with the only difference being that Option 5 limits the land for Enfield. Enfield supports more than half of the waste sites within the NLWP, and the Boroughs have recognised that a greater geographic spread of sites will create opportunities for other land uses within the NWLP area.

5.10 In short, the assessment of the options is supportive of the NWLP's preferred option (Option 5), recognising that this provides the balance between the NWLP's environmental, economic and social aims for managing waste alongside the Boroughs' other commitments in North London.

Capacity Strategy Options

5.11 The assessment of the updated capacity strategy in Appendix C was conducted to take account of the updated Options Appraisal Report (2019), which was updated to line up with updates to the London Plan. The assessment of the options is supportive of the NLWP's preferred capacity strategy option (Option 5) as this provides the greatest positive impact in relation to the SA Objectives. Most notably, this option also provides the greatest opportunity to minimise waste-related travel/transport and maximise net self-sufficiency in the management of North London's waste.

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Appendix A: Assessment of Main Modifications

The North London Boroughs are proposing modifications to the Proposed Submission NLWP to address the issues raised during the public hearings and as a result of the public consultation on the Main Modifications. The Proposed Modifications have been listed together in one schedule, 'Proposed Modifications' (2020), and have been divided into Main Modifications and Additional Modifications.

Additional Modifications which are very minor in nature and which provide clarity and/or correct errors and are not significant regarding the SA. Main Modifications relate to amendments that resolve soundness and legal compliance issues and are the subject of this SA Addendum. Most of the Main Modifications are amendments, deletions, additions or corrections were made to enhance clarification and provide guidance for development.

Each Main Modification has been assessed to determine whether or not the proposed modification is likely to significantly affect the findings of the Proposed Submission SA Report (2019) or give rise to significant environmental effects. The results of these assessments are contained in Table A.

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Key:

Proposed modifications made in January 2019 are shown with underline or ~~strike-through~~

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

Supplementary modifications made after the Main Modifications consultation are shown in red

Table A: Assessment of Main Modifications against the SA Framework

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
MM1	1.3	**The Aim and Strategic Objectives:** […] **The Spatial Principles ~~Framework~~**: The spatial principles flow from the Strategic Objectives and provide the strategic direction for the detailed policies of the NLWP and inform site/area selection. ~~This sets out~~ They reflect the physical and planning components that influence the Plan and guide the ~~identifies~~ identification of opportunities and constraints for waste planning in North London.	0 Neutral This modification provides clarity on the purpose of the Spatial Principles. This does not constitute a change in the content of the plan and so there are no implications on the sustainability of the plan.	Section 4.3 Spatial Strategy (the terminology 'strategy' preceded 'framework' and 'principles'); Appendix 2.
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.	0 Neutral This modification brings the wording of the NLWP in line with wording in the draft London Plan and does not constitute a change in the content of the plan. There are therefore no implications on the sustainability of the plan.	Not specifically assessed in the SA.
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:	0 Neutral This modification provides clarity on	Section 3.2

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
		[…] SO3. To plan for net self-sufficiency in LACW, C&I, C&D waste streams, including hazardous waste, by providing opportunities to manage as much as practicable of North London's waste within the Plan area taking into account the amounts of waste apportioned to the Boroughs in the London Plan, and the requirements of the North London Waste Authority, to seek beneficial use of excavation waste, and to monitor waste exports as part of the ongoing duty to co-operate. Met through Policies 1, 2, 3, 4, and 8 [footnote] ~~Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste generated in North London, while recognising that some imports and exports will continue.~~	the purpose of the Strategic Objectives and ensures that the wording in the NLWP is consistent with the draft London Plan. This does not constitute a change in the content of the plan and so there are no implications on the sustainability of the plan.	
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 CO_2 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.	0 Neutral This addition describes the NLWP's approach climate change and a commitment to reduce reliance on landfill sites. This text provides additional context and background for the Spatial Principles, which follow this text, but does not constitute a change in the plan itself so the sustainability of the plan is not impacted.	Not specifically assessed in the SA.
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	0 Neutral This modification provides clarity on the purpose of the	Section 4.3 Spatial Strategy; Appendix 2

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
		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.	Spatial Principles. This does not constitute a change in the content of the plan and so there are no implications on the sustainability of the plan.	
MM6	4.11 (part)	The current and changing character of each borough's industrial land is a consideration in identifying locations for new waste infrastructure. ~~It should be noted that the draft New London Plan identifies Enfield as a 'provide capacity' borough for the management of industrial floorspace capacity, and the other six North London Boroughs are identified as 'retain capacity' boroughs.~~ Larger and co-located facilities are more suited to areas with similar existing uses away from sensitive receptors. A future waste industry focused on resource management may derive positive cumulative impacts from a concentration of facilities. Conversely, the urban environments of NLWP boroughs are restricted by severe physical constraints limiting opportunities for some types of waste facilities. In addition, ~~some areas, such as~~ most waste facilities would be regarded as inappropriate development in the protected Green Belt in the north, will be largely out of bounds for any built waste facilities unless very special circumstances justifying the use of Green Belt land have been demonstrated. As population and densities in the plan area increase with projected growth, fewer areas away from sensitive receptors will be available. Continued development of waste facilities in areas which have, and continue to provide, significant waste capacity could have wider implications on the regeneration of the local economy. When choosing locations for future development, the benefits of co-location will need to be balanced against the cumulative impacts which can arise from an accumulation of facilities in one location. Cumulative impacts can include traffic levels, noise and odours. There may be times when the cumulative impacts of several waste developments operating in an area would be considered unacceptable.	0 Neutral This clarification ensures consistent wording between the NLWP and the draft London Plan but has no impact on the sustainability of the plan. The presumption against development in Green Belt land is enshrined in the use of 'Green Belt' as an absolute criteria which, if met, would result in the removal of a potential site or area from the long list of options for waste sites.	Section 4.3 Spatial Strategy; Appendix 2
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.	0 Neutral This explains the existing spread of waste sites within North London, providing additional context for why a better	Section 4.3 Spatial Strategy; Appendix 2

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
			geographic spread, that prioritises Boroughs other than Enfield, is desired. The approach set out to achieve this is already incorporated into the plan through the site selection process which placed a cap on the amount of land in Enfield that could be proposed for waste use.	
MM8	4.12	While all industrial land in North London is suitable 'in principle' for waste uses, there are certain locations which are more suitable than others to provide the waste capacity needed. Section 8 of the NLWP sets out how 'Priority Areas' for new waste facilities in North London were identified. One of the considerations was creating a better geographical spread, and this has been sought by limiting the number of Priority Areas within Enfield. The NLWP takes an area-based approach to waste planning and identifies certain industrial and employment areas as in principle more suitable for waste use but where the land is not specifically safeguarded for waste. The area-based approach allows for flexibility in bringing forward a range of locations across North London which is combined with policy to promote areas outside Enfield first (see Policy 2). This is supported by annual monitoring to check that land for waste capacity is being taken up as anticipated (see Chapter 10 monitoring indicator IN3). In addition the NLWP supports the intensification of existing waste facilities where appropriate to optimise their throughput (see Policy 1). [separate here to new para] ~~Policy 2 seeks to extend the existing spread of locations for waste facilities by identifying locations which are suitable for new waste facilities, taking into account~~ In combination, existing waste sites and the 'Priority Areas' are considered a sustainable network of waste facilities because they present sufficient opportunity to meet North London's waste capacity needs and net self-sufficiency targets while promoting a better geographical spread. They will help reduce movements of waste, including waste exports and increase opportunities for waste to be managed in proximity to its source. New waste facilities will be directed towards the most suitable land in North London when assessed against the planning criteria (see Table 10) as well as ~~factors such as~~ the character of different areas, changing land uses and availability of suitable industrial land. Policy 2 identifies these Priority Areas in Schedules 2 and 3. Outside of the Priority Areas, ~~W~~where demand arises, opportunities to improve the 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.	0 Neutral This provides greater context for Spatial Principle B but does not impact the sustainability of the plan.	Section 4.3 Spatial Strategy; Appendix 2
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.	0 Neutral This paragraph provides a	Section 4.3 Spatial

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
			narrative link between Spatial Principle C and Policies 2, 3 and 5. It explains how the policies of the plan are derived from, and align with, the Spatial Principles. The substance of the plan is not changed and therefore there is no impact on the sustainability of the plan.	Strategy; Appendix 2
MM10	4.18	The NPPW recognises the benefits of co-location of waste facilities with end users of their energy outputs. The London Plan (March 2016) supports developments that contribute towards renewable energy generation and seeks opportunities for the ~~development~~ provision of combined heat and power ~~systems~~ and cooling ~~provision of~~ heat and power to surrounding consumers. The draft New London Plan (December 2019) Policy SI8 encourages proposals for materials and waste management sites where they contribute towards renewable energy generation and/or are linked to low emission combined heat and power and/or combined cooling heat and power (CHP is only acceptable where it will enable the delivery or extension of an area-wide heat network consistent with Policy SI3 Part D1e). The same policy requires ~~expects~~ facilities generating energy from waste to meet, or to demonstrate that steps are in place to meet in the near future, a minimum performance of 400g of CO2 equivalent per kilowatt hour of electricity produced.	0 Neutral This addition ensures consistent wording with the draft London Plan. The requirements of Policy SI8 of the draft London Plan referenced here are not the subject of this SA. Spatial Principle D has been assessed as having a minor positive impact on SA Objective 9. This additional text serves to highlight how this positive outcome will be achievable.	Section 4.3 Spatial Strategy; Appendix 2
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 was considered	0 Neutral This text provides context for the approach of the NLWP to	Section 4.3 Spatial Strategy; Appendix 2

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for SA</th><th>Reference location in 2019 SA</th></tr>
<tr><td></td><td></td><td>when assessing the suitability of new sites and areas. Rail and water ~~road~~ transport is particularly desirable when waste is travelling long distances. Policy 5 considers sustainable transport modes in planning decisions.</td><td>sustainable transport, but the sustainability of the plan is not impacted as this is addressed in detail in Policy 5.</td><td></td></tr>
<tr><td>MM12</td><td>New after 5.3</td><td>A Data Study Addendum (2020) was prepared to support the Main Modifications to the NLWP. The Data Study Addendum proposes modifications to the way data is presented in the NLWP so that the reader can more readily follow the line of justification and reasoning behind the approach to waste management in North London.</td><td>0 Neutral
This is explanatory text that does not impact the sustainability of the plan.</td><td>Not specifically assessed in the SA.</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>0 Neutral
This is a factual addition which provides greater context for the current baseline situation and does not impact the sustainability of the plan.</td><td>Not specifically assessed in the SA.</td></tr>
<tr><td>MM14</td><td>Revised Table 4</td><td>Revised Table 4 : The amount of North London’s waste managed in North London and elsewhere ~~Waste recorded as exported from North London to landfill 2011-2016~~
<table>
<tr><th>Waste stream</th><th>Waste arising</th><th>Amount managed in North London</th><th>Amount managed elsewhere in London</th><th>Amount exported to landfill outside London</th><th>Amount exported to other facilities outside London</th></tr>
<tr><td>LACW</td><td>845,776</td><td>718,900</td><td>1,000</td><td>68,900</td><td>56,900</td></tr>
<tr><td>C&I</td><td>762,301</td><td>402,900</td><td>34,600</td><td>251,600</td><td>73,000</td></tr>
<tr><td>C&D</td><td>443,180</td><td>248,000</td><td>108,225</td><td>30,200</td><td>31,000</td></tr>
<tr><td>Hazardous (HWDI)</td><td>53,420</td><td>313</td><td>12,663</td><td>8,557</td><td>31,887</td></tr>
<tr><td>Proportion</td><td></td><td>66%</td><td>7.5%</td><td>17%</td><td>9%</td></tr>
<tr><td>Excavation</td><td>747,242</td><td>52,523</td><td>335,862</td><td>265,415</td><td>82,463</td></tr>
<tr><td>Proportion</td><td></td><td>7%</td><td>45%</td><td>35.5%</td><td>11%</td></tr>
</table></td><td>0 Neutral
This is a factual addition which provides greater context for the current baseline situation and does not impact the sustainability of the plan.</td><td>Section 4.2 Strategic Approach</td></tr>
</table>

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
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.~~	0 Neutral This provides additional context for the current baseline situation with regards to waste imports in North London and does not impact the sustainability of the plan. The use of existing waste sites to meet some capacity is supported by Policy 1.	Section 4.2 Strategic Approach
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.~~	0 Neutral This is a factual addition which provides greater context for the current baseline situation and does not impact the sustainability of the plan.	Section 4.2 Strategic Approach
MM17	New [after 5.27]	Local planning authorities have a duty to cooperate with each other on strategic matters that cross administrative boundaries. Exports of waste from one waste planning authority to another is a strategic cross-boundary matter and is an important consideration in assessing the effectiveness of the NLWP. It is therefore important to understand the destination of North London's waste exports and to understand any issues which could prevent similar amounts of waste being exported in the future. 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	0 Neutral This provides additional context for the current baseline situation with regards to future handling of waste from North London that needs to go to landfill. This has no impact on the sustainability of the plan.	Section 4.2 Strategic Approach

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
		recognising that some imports and exports will continue. For most waste streams, the market dictates where the waste is managed, however the more capacity there is within North London, the more opportunity for North London's waste to be managed within its own boundaries.		
MM18	5.32	~~Nonetheless, as set out in the exports to landfill paper, alternative capacity at other potential destinations has been identified for the amount of waste currently being exported to those sites earmarked for closure during the plan period.~~ It is recognised that non-hazardous landfill capacity in the wider south east is declining and no new non-hazardous landfill sites are being put forward by waste operators. A small number of new inert waste sites are being put forward in former mineral works. The lack of landfill capacity in the wider south east is an issue for all WPAs preparing plans and there is a continuing need to plan to manage waste further up the waste hierarchy to help reduce the need for landfill capacity. ~~The paper shows that There is opportunity for the market to find are both alternative destinations sites and adequate void space in London, South East and East of England for to take North London's 'homeless' waste in the short term between 2018 and 2035. In the longer term, beneficial use of excavation waste and the Circular Economy Statements will assist the North London Boroughs to reduce exports of waste to landfill and monitor the destinations of waste exports.~~ [Moved from 5.31] 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.	+ Minor positive With an ever-decreasing capacity around North London for non-hazardous landfill capacity, alternative solutions will become more viable. This should enable development of innovative waste management technologies and will promote waste minimisation as there will be greater financial and practical benefits to diverting waste from landfill. This will improve the plan's sustainability in relation to SA Objective 13.	Section 4.2 Strategic Approach
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 draft new London Plan (December 2019) are as follows: **Table 5: Recycling and Recovery Targets with 2016 Baseline** **Waste stream** / **Target** / **2016 baseline**	0 Neutral These amendments correct baseline data and clarify targets taken from the draft new London Plan. The target for	Section 4.2 Strategic Approach

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for SA</th><th>Reference location in 2019 SA</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>LACW</td><td>Contributing towards 65% recycling of municipal waste by 2030</td><td>279%</td></tr>
<tr><td>C&I</td><td>Contributing towards 65% recycling of municipal waste by 2030</td><td>4452%</td></tr>
<tr><td>C&D</td><td>95% reuse/recycling/recovery ~~by 2020~~</td><td>9350 60%</td></tr>
<tr><td>Excavation</td><td>95% beneficial use</td><td>Not known</td></tr>
<tr><td>Biodegradable or recyclable waste</td><td>Zero biodegradable or recyclable waste to landfill by 2026</td><td>Not known</td></tr>
<tr><td>Hazardous</td><td>Included in LACW, C&I and C&D targets</td><td>N/A</td></tr>
</table>
</td><td>excavation waste of 95% beneficial use was previously referred to in Chapter 7 of the plan, so is a restructuring of text rather than a new target. There is therefore no impact on the sustainability of the plan.</td><td></td></tr>
<tr><td>MM20</td><td>5.13</td><td>[Moved here]

The European Commission has put forward a Circular Economy Package’. This includes a 65% recycling target for municipal waste (LACW and C&I) by 2030. Notwithstanding the UK leaving the EU, the UK has signed up to delivering these targets as part of Brexit. The Circular Economy Package (CEP) recycling target of 65% municipal waste by 2030 has been superseded by the London Environment Strategy (LES) published in May 2018 in time to be incorporated into the NLWP. The LES aims to achieve 65% recycling from London’s municipal waste by 2030; this will be achieved through a 50% recycling rate from LACW by 2025 (LES Policy 7.2.1) and 75% from business waste by 2030 (LES policy 7.2.2). The LES therefore goes further than the CEP by bringing forward London’s LACW recycling target to 2025. The LES states that the Mayor expects waste authorities to collectively achieve a 50 per cent LACW recycling target by 2025 and aspire to achieve 45% household waste recycling by 2025 and 50% by 2030. Responsibility falls largely to London Boroughs in their capacity as waste collection and waste disposal authorities. The NLWA are expected to contribute to the Mayor’s targets and produce a waste strategy to show they are acting in conformity with the LES policies and proposals (see LES Box 36). ~~These revised targets have been built into NLWP waste modelling work as part of the revisions to the Data Study, however the new targets have only been applied to C&I waste as it is assumed no change to the projections of the NLWA at this time.~~</td><td>+ Minor positive

These amendments provide additional context for the waste strategy by incorporating more ambitious recycling targets from the LES. These new targets apply to the entire waste stream, rather than just C&I waste, so the this will improve the sustainability of the plan in relation to SA Objective 11.</td><td>Section 4.2 Strategic Approach</td></tr>
<tr><td>MM21</td><td>5.21</td><td>[Part of 5.21 moved here]

The draft New London Plan (December 2019) includes a target of 95% reuse/recycling/recovery of C&D waste ~~CD&E by 2020~~ and 95% beneficial use of excavation waste. Beneficial use could include using excavated material within the development, or in habitat creation, flood defences or landfill restoration. Preference should be given to using the materials on-site or within local projects.</td><td>0 Neutral

See MM19.

This amendment provides clarification of the term ‘beneficial use’.</td><td>Section 4.2 Strategic Approach</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for SA</th><th>Reference location in 2019 SA</th></tr>
<tr><td>MM22</td><td>6.4 (part)</td><td>Options for ~~managing~~ modelling North London’s future waste arisings

In accordance with the NPPF (paragraph 35) to ensure the NLWP is justified, a range of options were tested as part of the consideration of reasonable alternatives for ~~managing~~ modelling North London’s waste arisings over the plan period. Analysis of and consultation on these options led ~~leading~~ to the selection of ~~the~~ a preferred strategy. These options seek to reflect the effects of future economic activity, including fiscal, financial and legislative factors such as landfill tax charges driving waste away from landfill, and financial incentives such as ROCs (Renewable Obligations Certificates) increasing the competitiveness of energy recovery. Employment growth is based on demographic projections of employment in the London Plan using North London Borough employment projections and is applied to the growth rates for the C&I and CD&E streams. For the LACW stream, the NLWA have provided the projections which have been used to inform the proposed application for a Development Consent Order to enable them to develop and operate an Energy Recovery Facility (ERF) at the Edmonton EcoPark from 2026. The scenarios considered are summarised in New Table, with the preferred scenarios highlighted. ~~looked at a range of options for recycling from maintaining the status quo to seeking to maximise opportunities for recycling in line with the targets set out in Table 5 above, the latter option being the most popular option and taken forward. Along with this a number of options were also considered in relation to waste growth over the plan period and what impact that would have on waste growth, again 3 approaches were modelled looking at no growth, growth in line with the London Plan (March 2016) for C&I and CDE waste – with LACW growth being in line with that of the NLWA for all options, a minimised growth was also modelled but was not considered in line with the growth planned for in the London Plan (March 2016), as such growth was modelled in line with the London Plan (March 2016).~~

[Moved down to after new Table 5]

[An Options Appraisal Report (2018) has been prepared which provides more detail on each of the options considered and provides information on the different scenarios including how much waste would be generated over the plan period (incorporating economic and population growth assumptions), how much waste could be managed within North London (capacity strategy), and how this waste should be managed (management strategy) for each of the options considered. The preferred option identified in the Options Appraisal has been carried through to the NLWP. The preferred option seeks to achieve growth in line with the London Plan (March 2016) and to deliver the targets set out in the Mayor’s Environment Strategy.]</td><td>0 Neutral

This text provides additional detail on the consideration of options for modelling and managing future waste arisings in North London. It seeks to demonstrate the steps taken to shape North London’s waste strategy. However, these amendments do not alter the substance of the strategy/plan itself so there is no impact on the sustainability of the plan.</td><td>Section 4.2 Strategic Approach</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>
</table></td><td>0 Neutral

See MM22.</td><td>Section 4.2 Strategic Approach</td></tr>
</table>

Reference	Section	Further modification						Implications for SA	Reference location in 2019 SA
		Self-sufficiency	Self-sufficiency	Self-sufficiency		Self-sufficiency			
		Growth Options							
			No growth (0% pa)	No growth (0% pa)	No growth (0% pa)	No growth (0% pa)	No growth (0% pa)		
			Minimised growth (0.40% pa)	Minimised growth (0.40% pa)	Minimised growth (0.40% pa)	Minimised growth (0.40% pa)			
		NLWA Waste Forecasting Model[1]	Growth (0.81% pa)	Growth (0.81% pa)	Growth (0.81% pa)	Growth (0.81% pa)			
		Management Options							
			Baseline (no change)	Baseline (no change)	Baseline (no change)	Baseline (no change)	Baseline (no change)		
			Median 80% recycling by 2035 16% Energy Recovery by 2035 4% to Landfill by 2035	Median 85% recycling 9% treatment 6% landfill					

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
		NLWA Forecasting model Central Scenario 44% recycling by 2035 (50% HH recycling by 2035) 55% Energy Recovery by 2035 1% landfill Maximised 85% Recycling by 2035 12% Energy Recovery by 2035 3% to Landfill by 2035 Maximised 95% recycling / recovery / reuse 5% landfill Maximised 95% beneficial use 5% landfill		
MM24	6.4 (part) [Moved to after new Table 5]	Further details of these options is available in NLWP Data Study 2. An Options Appraisal Report (2019~~8~~) has also been prepared which provides more detail on each of the options considered and provides information on the different scenarios including how much waste would be generated over the plan period (incorporating economic and population growth assumptions), how much waste could be managed within North London (~~capacity strategy~~ net self-sufficiency options), and how this waste should be managed (management ~~strategy~~ options) for each of the options considered. Meeting North London's LACW, C&I and C&D waste arisings, including hazardous waste, was the preferred net self-sufficiency option because it is compliant with national legislation on managing all main 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.~~	0 Neutral See MM22.	Section 4.2 Strategic Approach
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	0 Neutral This is further explanatory text to describe the waste arisings in table 8 (linking to the NLWP data study), the justification for the proposed waste strategy and how the proposed waste strategy aligns with the aforementioned	Section 4.2 Strategic Approach

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for SA</th><th>Reference location in 2019 SA</th></tr>
<tr><td></td><td></td><td>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.</td><td>Strategic Objectives. The additional information here does not alter the substance of the strategy/plan and as such these changes have no impact on the sustainability of the plan.</td><td></td></tr>
<tr><td>MM26</td><td>Table 8 [revised and moved here]</td><td>Table 8: Projected arisings and management of North London's waste 2020-2035
<table>
<tr><th>Waste Stream</th><th>Facility Type</th><th>2020</th><th>2025</th><th>2030</th><th>2035</th></tr>
<tr><td>LACW</td><td>Recycling</td><td>418,169</td><td>424,049</td><td>430,280</td><td>436,824</td></tr>
<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>
</table></td><td>0 Neutral

See MM22.</td><td>Section 4.2 Strategic Approach</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for SA</th><th>Reference location in 2019 SA</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>Agricultural</td><td>Recycling</td><td>89</td><td>89</td><td>89</td><td>89</td></tr>
<tr><td>Agricultural</td><td>Recovery, Treatment</td><td>9,130</td><td>9,130</td><td>9,130</td><td>9,130</td></tr>
<tr><td>Agricultural</td><td>Landfill</td><td>4</td><td>4</td><td>4</td><td>4</td></tr>
<tr><td colspan="2">Total Agricultural Waste</td><td>9,223</td><td>9,223</td><td>9,223</td><td>9,223</td></tr>
</table>
</td><td></td><td></td></tr>
<tr><td>MM27</td><td>5.5 [Moved here after Table 8]</td><td>Existing capacity

Table 3 below summarises ~~shows~~ the existing (2016~~8~~) capacity of North London's waste management facilities ~~in North London~~ by type of facility and waste stream managed ~~and changes in available capacity at known dates when facilities come on stream/close~~. It identifies an existing waste management capacity of ~~around 4.4~~ just over a million tonnes per annum of recycling/composting for the LACW and C&I waste streams, just under 600,000 tonnes per annum of energy recovery for LACW, around 630,000 tonnes per annum of recycling and treatment for CD&E waste, and about 4,250 tonnes of hazardous waste capacity. ~~reducing to around 3.8 million tonnes by 203529 as a result of known closure of some existing sites up to 2028~~ . Figure 9 shows the location of the facilities represented in Table 3 and a full list is in Appendix 1.</td><td>0 Neutral

This provide additional clarification on the existing waste management capacity in North London, which informs the NLWP strategy. This text clarifies the 'baseline' and does not constitute a change that would impact the sustainability of the plan.</td><td>Section 2.2</td></tr>
<tr><td>MM28</td><td>Table 3 [Revised and moved here after 5.5]</td><td>Table 3: ~~Maximum~~ Existing Annual Capacity at Licensed Operational Waste Management Facilities ~~at the Start of the Plan Period~~ ~~and a key dates following changes in sites capacities~~
<table>
<tr><th colspan="2">Type of capacity</th><th>Waste stream</th><th>Existing capacity (2016)</th></tr>
<tr><td rowspan="4">Management</td><td rowspan="3">Recycling / Composting / Treatment</td><td>LACW / C&I</td><td>1,062,424</td></tr>
<tr><td>CD&E</td><td>633,436</td></tr>
<tr><td>Hazardous</td><td>4,252</td></tr>
<tr><td>Energy Recovery</td><td>LACW / C&I</td><td>597,134</td></tr>
<tr><td rowspan="2"></td><td>Transfer</td><td>All</td><td>1,225,068</td></tr>
<tr><td>Landfill</td><td>All</td><td>0</td></tr>
</table>
Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2012-2016</td><td>0 Neutral

See MM27.</td><td>Section 2.2</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</td><td>0 Neutral

See MM27.</td><td>Section 2.2</td></tr>
</table>

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
		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.~~		
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.	0 Neutral This addition provides clarity and context for the NLWP strategy. It is a factual addition that does not impact the sustainability of the plan.	Not specifically assessed in the SA.
MM31	8.5 Moved here	**Edmonton EcoPark** A Development Consent Order (DCO) has been approved by the Secretary of State for a ~~the~~ new Energy Recovery Facility (ERF) which will manage the treatment of the residual element of LACW during the NLWP plan period and beyond. The existing Edmonton EfW provides just under 600,000 tonnes of waste management capacity per annum and the new facility will provide around 700,000 tonnes per annum. This is an additional 100,000 tonnes which has been built into the calculation for the capacity gap. ~~The replacement facility, expected to be operational from 2025, will generate power for around 127,000 homes and provide heat for local homes and businesses as part of a decentralised energy network known as the Lee Valley Heat Network, trading as energetik.'~~	0 Neutral This provides additional information regarding the ERF and its contribution to the waste management capacity of North London. This provides detail that serves as context for the NLWP strategy but does not constitute a change in the plan. There is therefore no impact on the sustainability of the plan.	Section 2.2
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.	0 Neutral See MM31.	Section 2.2

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
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.	0 Neutral This provides clarity regarding Powerday WTS and its contribution to the waste management capacity of North London. It serves as context for the capacity calculations that inform the NLWP strategy but does not constitute a change in the plan. There is therefore no impact on the sustainability of the plan.	Section 2.2
MM34	8.11 Moved here	**Loss and re-provision of existing waste management facilities** Where existing sites need to be relocated, compensatory capacity is required in order to comply with the London Plan, Borough Local Plans and, once adopted, the NLWP. It is known that some waste sites in North London will be redeveloped for other uses as part of the Brent Cross Cricklewood Regeneration scheme. ~~capacity will be lost~~ during the plan period. ~~Some of this capacity will be replaced within North London, some outside North London with a net loss to North London but not to London as a whole, and some is as yet unknown.~~ ~~Where such issues are known and new sites have already been sought, this information has been fed into the Plan process and~~ This information has been ~~given~~ highlighted in Schedule 1.	0 Neutral This provides updated information regarding expected loss/re-provision of waste sites in North London. It serves as context for the capacity calculations that inform the NLWP strategy but does not constitute a change in the plan. There is therefore no impact on the sustainability of the plan.	Not specifically assessed in the SA.

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
MM35	8.12 Moved here	The ~~North London Boroughs are aware that the regeneration of~~ Brent Cross Cricklewood Regeneration Area ~~redevelopment~~ (BXC) ~~is likely to affect~~ includes four existing waste sites, comprising a NLWA transfer station and three commercial operations. These are BAR3 PB Donoghue, BAR4 Hendon Transfer Station, BAR6 McGovern, and BAR7 Cripps Skips. These sites will be redeveloped under the ~~approved~~ planning permission for the regeneration of Brent Cross Cricklewood (Barnet planning application reference F/04687/13). The Hendon Rail Transfer Station (BAR 4) will be replaced ~~as part of the BXC development~~ with a new facility ~~on site S01 BA~~ to meet the NLWA's requirements; planning permission for this new site at Geron Way was granted by Barnet Council in September 2018. The existing commercial facilities at BAR 6 and BAR 7 fall within the land required to deliver the early ~~first~~ Southern phase of the BXC regeneration which 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 area on alternative sites / areas to be identified by the London Borough of Barnet by 2025 in line with the planning permission.~~ The BAR3 site is identified for redevelopment in Phase 4 of the BXC regeneration and is currently not anticipated to be redeveloped until after 2026. 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 will be replaced by the new Waste Transfer Station (WTS) delivered as part of the Brent Cross Cricklewood Regeneration. The balance of replacement capacity for BAR3 will need to be identified prior to its redevelopment and the London Borough of Barnet will seek to provide replacement capacity within the borough with the Local Plan identifying potential sites. For the purposes of the plan, therefore, it is assumed there will be no loss of capacity for these facilities.	0 Neutral This provides updated information regarding expected loss/re-provision of waste sites in North London. It serves as context for the capacity calculations that inform the NLWP strategy but does not constitute a change in the plan. There is therefore no impact on the sustainability of the plan.	Not specifically assessed in the SA.
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.	0 Neutral This provides updated information regarding expected loss/re-provision of waste sites in North London. It serves as context for the capacity calculations that inform the NLWP strategy but does not constitute a change in the plan. There is therefore no impact on the sustainability of the plan.	Not specifically assessed in the SA.
MM37	6.7	**Meeting the Capacity Gap**	0 Neutral	Not specifically

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for SA</th><th>Reference location in 2019 SA</th></tr>
<tr><td></td><td></td><td>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>This provides a clearer explanation of the capacity gap and provides updates that align it with the revised version of Table 6. It serves as context for the capacity calculations that inform the NLWP strategy but does not constitute a change in the plan. There is therefore no impact on the sustainability of the plan.</td><td>assessed in the SA.</td></tr>
<tr><td>MM38</td><td>Table 6</td><td>[Revised]

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

<table>
<tr><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>1,062,424</td><td>1,062,424</td><td>1,062,424</td><td>1,062,424</td></tr>
<tr><td>Existing and pipeline capacity - recovery</td><td>597,134</td><td>700,000</td><td>700,000</td><td>700,000</td></tr>
<tr><td>Loss of capacity - composting</td><td>-</td><td>35,200</td><td>35,200</td><td>35,200</td></tr>
<tr><td>Capacity Gap</td><td>-114,923</td><td>-91,718</td><td>-138,763</td><td>-188,284</td></tr>
</table>

<table>
<tr><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>
</td><td>0 Neutral

This provides a clearer explanation of the capacity gap. It serves as context for the capacity calculations that inform the NLWP strategy but does not constitute a change in the plan. There is therefore no impact on the sustainability of the plan.</td><td>Not specifically assessed in the SA.</td></tr>
</table>

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
		<table><tr><td>Hazardous</td><td>2020</td><td>2025</td><td>2030</td><td>2035</td></tr><tr><td>Projections</td><td>53,421</td><td>53,421</td><td>53,421</td><td>53,421</td></tr><tr><td>Existing and pipeline capacity</td><td>4,252</td><td>4,252</td><td>4,252</td><td>4,252</td></tr><tr><td>Capacity Gap</td><td>**-49,169**</td><td>**-49,169**</td><td>**-49,169**</td><td>**-49,169**</td></tr></table>		
MM39	New	[New para after Revised Table 6, now Table 8] 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).	0 Neutral The opportunity to maximise the capacity of existing sites in order to meet the capacity gap is already identified in Policy 1. This additional text here provides a narrative link to this text but does not change the content or intention of the plan, so there is no impact on the sustainability of the plan.	Not specifically assessed in the SA.
MM40	6.8	~~The capacity gap figures in tonnage of waste have been converted to waste management land requirement using data from evidence gathered and evaluated on typical capacity and land take~~ In order to estimate how much land is required for plan-making purposes, the capacity gap has been converted into a land area requirement based on a typical throughput per hectare for each type of facility. The amount of land required depends on the type of facility and the technology being used. New technologies may come forward during the plan period which have a higher throughput per hectare and so will require less land. The North London Boroughs want to ensure the best use of land in the area and this means maximising the capacity of a site while mitigating any environmental impacts. The land required is indicative only and new capacity will be monitored rather than land. Reference capacities are set out in ~~the table~~ Table New below. Table 20 in section 7 of the Data Study Part 2 (2019~~8~~) ~~available on the website (www.nlwp.net)~~ provides a fuller explanation. Table 7 below sets out the amount of land required within North London to meet the capacity gaps identified in Table 6 for the chosen approach of net self-sufficiency for LACW, C&I and C&D waste streams. In order for net self-sufficiency to be achieved by 2026, in line with the London Plan, new capacity will need to be delivered by this date.	0 Neutral This provides a clearer explanation of the calculations used to determine land requirements to meet the capacity gap. It bases the calculations on the updated Data Study and the requirement of the draft new London Plan to achieve net self-sufficiency by 2026, rather than	Not specifically assessed in the SA.

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for SA</th><th>Reference location in 2019 SA</th></tr>
<tr><td></td><td></td><td></td><td>2035 as was the target in the Proposed Submission NLWP. These changes result in a reduction in the identified land requirement and imply that net self-sufficiency will be achieved earlier. As such, there will be greater certainty by 2026 of which Priority Areas will be needed for waste sites during the plan period (to 2035) and which can be developed for other uses. This is a positive outcome but may not directly result in any impact on the sustainability of the plan.</td><td></td></tr>
<tr><td>MM41</td><td>New Table</td><td><u>New Table: Reference Capacities for Land Take for New Waste Facilities</u>
<table><tr><th><u>Facility type</u></th><th><u>Assumed tonnes per hectare</u></th></tr><tr><td><u>Energy from waste (large scale)</u></td><td><u>165,000</u></td></tr><tr><td><u>Energy from waste (small scale)</u></td><td><u>50,000</u></td></tr><tr><td><u>Recycling (C+I & LACW)</u></td><td><u>128,000</u></td></tr><tr><td><u>Recycling (C+D)</u></td><td><u>100,000</u></td></tr><tr><td><u>Recycling (specialised – eg. metals)</u></td><td><u>50,000</u></td></tr><tr><td><u>Recycling (Hazardous)</u></td><td><u>10,000</u></td></tr><tr><td><u>Re-use</u></td><td><u>15,000</u></td></tr></table></td><td>0 Neutral
See MM40.</td><td>Not specifically assessed in the SA.</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for SA</th><th>Reference location in 2019 SA</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>Composting</td><td>25,000</td></tr>
<tr><td>Treatment plant</td><td>50,000</td></tr>
<tr><td>Treatment Plant (Hazardous)</td><td>10,000</td></tr>
</table>
</td><td></td><td></td></tr>
<tr><td>MM42</td><td>Table 7</td><td>[Table 7 revised]

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

<table>
<tr><th>Waste Stream</th><th>Management type</th><th>Hectares
2026</th></tr>
<tr><td>C&I/LACW</td><td>Recycling</td><td>1.5</td></tr>
<tr><td>Hazardous</td><td>Recycling/recovery/treatment</td><td>4.9</td></tr>
<tr><td>TOTAL land required in North London</td><td></td><td>6.4</td></tr>
</table>
</td><td>0 Neutral

See MM40 - this identifies the indicative land take requirements to meet the capacity gap based on the preceding calculations.</td><td>Not specifically assessed in the SA.</td></tr>
<tr><td>MM43</td><td>6.10</td><td>A capacity gap equivalent to ~~two~~ around 4.9 hectares of land has been identified for meeting North London’s hazardous waste management need over the plan period~~, a small requirement of less than 2,500 tonnes per annum has also been identified for recovery of hazardous waste, but this figure is considered too small to plan for~~. While the North London Boroughs support the provision of hazardous waste facilities in appropriate locations, it is acknowledged that these facilities generally operate for a wider-than-local catchment area due to their specialist nature. The Boroughs will therefore work with the GLA and other boroughs across London to identify and meet a regional need.</td><td>0 Neutral

See MM40.</td><td>Not specifically assessed in the SA.</td></tr>
<tr><td>MM44</td><td>New paragraphs after 8.1</td><td>At the core of waste planning is the requirement for waste planning authorities to “prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams” (NPPW 3). In particular, waste planning authorities should “identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations” (NPPW 4).

The London Plan (Policy SI8) requires Development Plans to plan for identified need and “allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste”. The London Plan also identifies existing waste sites, Strategic Industrial Land (SIL) and Locally Significant Industrial Sites as a focus for new waste capacity.

STRATEGIC OBJECTIVE 2 seeks to ensure there is sufficient suitable land available to meet North London’s waste management needs and reduce the movements of waste through safeguarding existing sites and identifying locations for new waste facilities.

Known opportunities to intensify and upgrade existing facilities have already been taken into account in section 6 and have been incorporated into the calculations for meeting the capacity gap. Where further opportunities to optimise waste management capacity on existing sites arise, this is supported by Policy 1 where the proposal is in line with relevant aims and policies in the North London Waste Plan, the London Plan, Local Plans and related guidance.</td><td>0 Neutral

This additional text serves to improve narrative flow and provide further justification that the plan has identified sufficient land. It links the conclusions drawn to the Strategic Objectives and the requirements of other applicable policies but does not constitute a change in the plan.</td><td>Not specifically assessed in the SA.</td></tr>
</table>

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
		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.	There is therefore no impact on the sustainability of the plan.	
MM45	8.2 [Restructured]	The ~~NLWP identifies a number of~~ North London Boroughs assessed a range of sites and areas to meet future waste needs. Assessment criteria have been developed using waste planning policy and in consultation with key stakeholders in a series of focus groups. This work is set out in the Sites and Areas Report. ~~It was initially intended to also identify sites within the NLWP, i.e.~~ A 'site' in this context is an individual plot~~s~~ of land that ~~would be~~ is safeguarded for waste use only. ~~However, only one site was brought forward by landowners during the call for sites exercises and no further sites are required for the management of LACW. As a result, only areas have been identified.~~ An 'area' comprises a number of individual plots of land, for example, an industrial estate or employment area that is in principle suitable for waste use but where land is not specifically safeguarded for waste. The NPPW and the draft New London Plan (December ~~July~~ 2019) endorse the identification of "sites and/or areas" in Local Plans. The approach is also supported by the waste industry and key stakeholder in consultation.	0 Neutral This clarifies the terminology used for assessing potential locations for future waste sites and directs the reader to the location of the assessments of these 'sites' and 'areas'. This is so that the justification for the inclusion/exclusion of sites and areas can be found more easily, thereby improving clarity. These clarifications do not impact the sustainability of the plan.	Section 4.2 (Sites and Areas); Section 4.3 (Area Allocations) and Appendix 5.
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 land in North London which are identified as "Priority Areas" in the Plan. The ~~proposed site and area search~~ criteria used in the NLWP site 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 ~~PPS~~10, the site and area search criteria were reviewed to ensure compliance with this document.	0 Neutral This provides additional context and explanation of the approach taken for identifying 'Priority Areas' but this does not impact the sustainability of the plan.	Section 4.2 (Sites and Areas); Section 4.3 (Area Allocations) and Appendix 5.

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
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.	0 Neutral The inclusion of the 'Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP' serves to further justify that the 'Priority Areas' identified in the plan will provide an appropriate amount of land for waste uses, in line with Spatial Principle B. This does not affect the conclusions drawn and so there is no impact on the sustainability of the plan.	Not specifically assessed in the SA.
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	0 Neutral This text explains the additional work that was conducted to further rationalise the sites and areas selected to be taken forward into the Proposed Submission NLWP. The approach used has not changed, but this text serves to improve the clarity of the description of the approach. The	Not specifically assessed in the SA.

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
			sustainability of the plan is therefore not impacted.	
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.	0 Neutral See MM48.	Not specifically assessed in the SA.
MM50	8.25 [restructured and split]	~~The North London Boroughs developed a range of reasonable options for taking forward sites and areas in the Proposed Submission version of the plan. Further~~ In considering geographical spread of facilities and reducing the sites and areas to be taken forward in the Proposed Submission Plan, each Borough's current contribution to waste management capacity In North London was calculated. Currently 62% of the total land in existing waste use across North London is located in Enfield. In order to address concerns that there is an over-concentration of waste facilities in Enfield, promote a better geographic spread of waste facilities in North London, and reduce the amount of land taken forward into the Proposed Submission Plan, the Boroughs considered five alternatives with different land options. The details of these options are brought together ~~set out~~ in 'Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP' (Updated 2020)~~(2018~~. The options included and excluded areas based on their performance against qualitative assessment criteria, such as Local Plan designations and performance against suitability rating (banding) as detailed in the Sites and Areas Report. Analysis of each of the five options considered, amongst other issues, the proportion of Enfield's contribution to the Areas identified. One of the options limited the number of Areas for new waste facilities in Enfield to one. The option with the lowest land provided (102ha) combined with the best geographical spread (limiting the land identified in Enfield) has been taken forward into this Plan. In looking to reduce the total amount of land identified as most suitable for new waste uses, the Boroughs did not identify any criterion which would provide a sound basis to reduce the number of areas further than a combined total of 102ha. The other options did not significantly reduce the amount of land identified and/or did not provide a better geographical spread of Areas. The preferred option was to take forward land designated as industrial land and high-performing (Band B) ~~sites/~~areas, while achieving a better geographical spread by reducing the ~~number of sites~~ amount of land for new 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.	0 Neutral See MM48. Although the 'Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP' has been updated since the Proposed Submission, the updates predominantly relate to clarity of assessment and ensuring the robustness of conclusions. The conclusions themselves have not changed as a result of these updates, so there is no impact on the sustainability	Not specifically assessed in the SA.

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
			of the plan as a result.	
MM51	New after 8.25	Following the work described above, all of the individual sites and several of the Areas were removed from Schedules 2 and 3 and in some of the remaining Areas the amount of land considered most suitable for new waste facilities was refined. The NLWP therefore takes an area-based approach to waste planning with no individual sites allocated for new waste facilities. An area-based approach is one which identifies areas which comprise a number of individual plots of land, for example, an industrial estate or employment area, that is in principle suitable for waste use but where land is not specifically safeguarded for waste uses. The identification of Areas allows for flexibility in bringing forward a range of locations across North London, allowing for a better geographic spread of opportunities for future waste development that is consistent with the spatial principles of the plan to meet North London's requirement. However, because the Areas identified are not safeguarded solely for waste use it is important to identify sufficient land to ensure adequate opportunity across North London for waste operators to provide new facilities because there will competition for this land by other industrial users. It should be noted that most waste planning authorities are in the same position and that this approach is supported by both the NPPW and the London Plan. An update to the Data Study to support the Proposed Submission NLWP reduced the indicative land required to meet the capacity gap from 12ha in the Draft NLWP to 9ha in the Proposed Submission NLWP. This has since reduced further to 6.4ha in light of the Data Study Addendum (2020). For the Plan to provide confidence that sufficient land is available in the right place and at the right time a quantum of land and number of Areas has to be identified. As identified in the Sites and Areas Report, it is not possible to say precisely how much of North London's industrial land could become available for waste uses over the plan period. This depends on the rate at which existing land becomes vacant in the identified Areas and a waste operator being ready and able to locate on that same site. This in turn depends on the wider economic factors. Identifying a range of land suitable for new waste facilities responds to the NPPW expectation that waste planning authorities "should identify sufficient opportunities to meet the identified needs of their area". This also provides flexibility for waste operators and should sites not become available in one particular Area, or if an Area changes over the plan period to become unsuitable for waste uses, this approach will ensure there are alternative land options available. The work set out in the 'Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP' resulted in reducing the total amount of land identified as most suitable for new waste facilities from 351.8 in the Draft Plan to 102.38ha in the Proposed Submission Plan. While 102ha is a large area when compared to the need for 6.4ha, this land is currently occupied by existing industrial uses. There is strong competition for industrial land in North London and this is reflected by low vacancy rates (an average of 4.8%). The Boroughs will rely on business churn for release of individual sites which could come forward for waste uses. The most recent analysis of business churn in London suggests that around 20% of land could be released in this way. Analysis of business churn and vacancy rates is included in the Sites and Areas Report. To provide 6.4ha, 6% of the Priority Areas would need to be developed for waste management to meet the capacity gap, if no additional capacity is provided on existing sites. It should be noted that 6.4ha of land is indicative only and throughput on a site will depend on the operational technology used. New capacity to meet North London's needs will be monitored rather than land take. The preferred approach limits the areas proposed for new waste facilities in Enfield to one industrial area and although this option is considered the most appropriate to take forward in the NLWP, there is a risk that the identified Area in Enfield (comprising 26ha) could	+ Minor positive See MM40 and MM50. This text also provides additional justification for the identification of 102.38ha of land as potential areas that could be used to meet the 6.4ha capacity gap. In addition, in order to ensure that the areas taken forward from the identified 102.38ha are selected in line with Spatial Principle B, an additional criterion has been added to Policy 2. This will have a positive impact on SA Objective 3, as by having a greater geographical spread of waste sites, travel distances to waste facilities will likely decrease.	Section 4.3 Spatial Strategy (assessment of Spatial Principles); Section 4.3 Policies (assessment of Policy 2)

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
		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 Schedules 2 and 3 in section 9), have been identified as the most suitable for built waste management facilities. The Priority Areas ~~areas~~ are being put forward as they comply with the NLWP Spatial Principles ~~Framework~~ which is reflected in the site and area selection criteria, as well as a range of environmental, social and economic criteria set out in the Sustainability Appraisal Scoping Report. In the absence of the identification of individual sites, the Priority Areas represent sufficient opportunities to deliver the identified waste management needs of North London over the plan period. ~~During the course of the plan, it is expected that land will become available as part of the business churn~~. In order to ensure that Priority Areas are the focus for new waste capacity, the location of new waste facilities and any compensatory capacity will be monitored through Monitoring Indicator IN3. The aim of the indicator is to check that sites in Priority Areas are being taken up as anticipated and also monitor if land within Schedules 1, 2 and 3 is not available or suitable for new waste facilities. The later aspect in particular will enable the Boroughs and developers to understand where sufficient land remains available and the geographic distribution of new waste facilities, which will inform potential site searches and evidence required by the Boroughs for those seeking planning consent for sites for waste uses. The monitoring will help to demonstrate the progress of the spatial principle for better geographical spread and achievement of the sequential approach to delivery of new waste sites set out in Policies 2 and 3. Any proposals for waste facilities within the Priority Areas ~~areas~~ will be subject to planning permission. ~~No provision is made for landfill due to the inability of the Plan area to accommodate development of landfill.~~	0 Neutral This is explanatory text to clarify how the desired outcomes of the plan will be achieved and monitored. These changes do not impact the sustainability of the plan.	Not specifically assessed in the SA.
MM53	Figure 13	Priority Areas for new waste management facilities ~~of proposed new areas~~	0 Neutral This map has been updated for aesthetic purposes to improve legibility and to include the correct terminology for 'Priority Areas'. The substance of the map has not changed so there is no impact on the sustainability of the plan.	Not specifically assessed in the SA.

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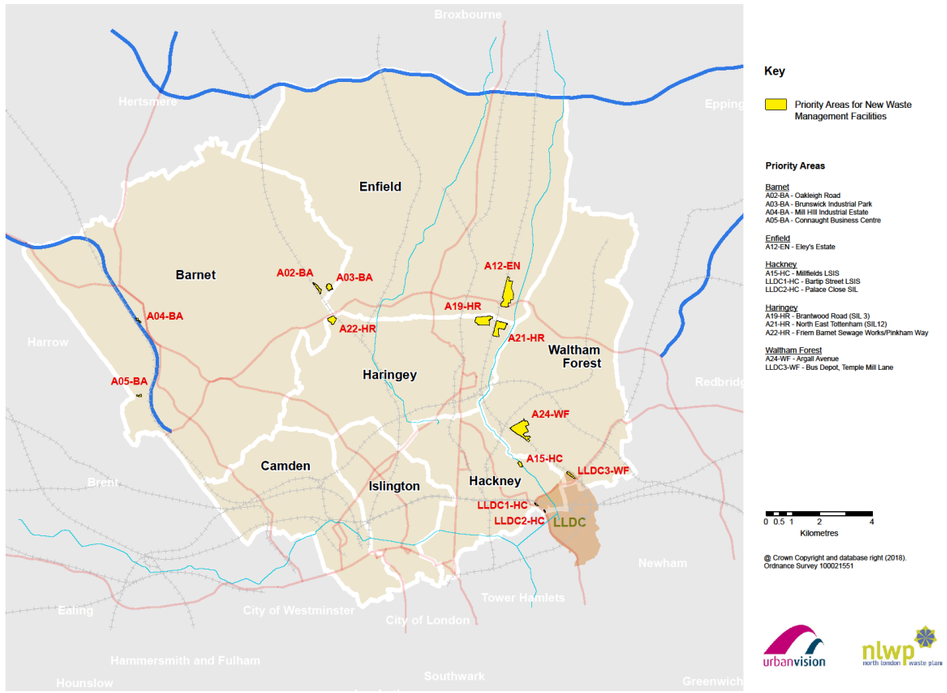
Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
				
MM54	7.2	Most of North London's waste capacity need is met through its existing facilities. These existing facilities are safeguarded through London Plan policy, however they are not always in the most sustainable 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 Schedules 2 and 3 (see Policy 3). The Priority Areas for new waste capacity represent the most suitable land when assessed against the Spatial Principles, including a better geographical spread, and the assessment criteria detailed in the previous chapter. This helps to deliver STRATEGIC OBJECTIVE 2 which seeks to ensure there is sufficient suitable land available to meet North London's waste management needs. The focus for new waste capacity in North London is for recycling and recovery facilities to manage the quantities of waste set out in Table 8, thereby reducing exports. New waste facilities will be assessed against the criteria in Policy 5.	0 Neutral This text provides a contextual link to Policies 1 and 5 as well as to Strategic Objective 2 to demonstrate the way in which the plan intends to maximise capacity at existing waste sites in order to meet the capacity gap. The additional text and amendments here do not constitute a change in the plan itself, so there is	Section 4.3 Strategy Policy (assesses Over-arching Policy)

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
			no impact on the sustainability of the plan.	
MM55	7.4	The North London Boroughs will monitor the NLWP against the projected quantities of waste generated set out in Table 8, (IN1), new waste management capacity delivered (IN2), the locations of new waste facilities and compensatory capacity (IN3) and the amount of waste exported (IN7) to ensure the ~~strategic~~ over-arching policy is being delivered. All monitoring indicators are set out in Section 10 of this plan.	0 Neutral This additional text serves to clarify the approach to monitoring the NLWP and to signpost to the updated indicators that will be used for monitoring. The addition of this signposting in and of itself does not constitute a change in the plan – therefore there is no impact on the sustainability of the plan.	Not specifically assessed in the SA.
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.~~	0 Neutral This is a factual amendment that clarifies why LACW and C&I waste have been grouped together for capacity assessments. It does not constitute a change in the content of the plan so no impacts on sustainability will occur as a result.	Not specifically assessed in the SA.

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
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.	0 Neutral This refers to additional text introduced earlier in the NLWP, to provide a contextual link to the capacity gap calculations in Chapter 6 of the plan.	Not specifically assessed in the SA.
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 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.	0 Neutral This provides updated information regarding the latest JWS; however, this has no impact on the sustainability of the plan.	Not specifically assessed in the SA.
MM59	7.10	There is a need for additional capacity for recycling for ~~both~~ the LACW/~~and~~ C&I waste streams throughout the plan period. ~~ALACW 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~~.	0 Neutral See MM56.	Not specifically assessed in the SA.
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.	0 Neutral The opportunities to bring forward capacity in the Priority Areas for commercial recycling and composting is already accounted for in the Appendix 2 area profiles.	Section 4.2 (Sites and Areas); Section 4.3 (Area Allocations) and Appendix 5
MM61	New after 7.14	There are opportunities for additional recovery capacity to be brought forward on three of the proposed Priority Areas.	0 Neutral The opportunities to bring forward	Section 4.2 (Sites and Areas);

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
			capacity in the Priority Areas for recovery is already accounted for in the Appendix 2 area profiles.	Section 4.3 (Area Allocations) and Appendix 5
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.	0 Neutral The opportunities to bring forward capacity in the Priority Areas for waste transfer facilities is already accounted for in the Appendix 2 area profiles.	Section 4.2 (Sites and Areas); Section 4.3 (Area Allocations) and Appendix 5
MM63	7.19	*Recycling* ~~The NLWP will identify sufficient land to manage the equivalent of all~~ North London has sufficient capacity to manage Construction and Demolition (C&D) waste arising in North London over the plan period. ~~by 2035, while acknowledging that s~~ Some exports of excavation waste will continue, but opportunities to manage as much of this waste stream as practicable within North London will be sought. ~~particularly for Excavation waste. At least 95% of excavation waste exports will be put to beneficial use~~	0 Neutral This text clarifies the approach to recycling C&D waste but does not change the approach itself. The target to put 95% of excavation waste to beneficial use is moved to Chapter 6 (see MM19).	Not specifically assessed in the SA.
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.	0 Neutral This provides a clearer link to the intended monitoring procedures for the recycling of C&D waste. This does not constitute a change that would have an impact on	Not specifically assessed in the SA.

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
			the sustainability of the plan.	
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.~~	0 Neutral See MM63. These amendments clarify targets that are taken from the draft new London Plan and do not constitute a change that would impact the sustainability of the plan.	Not specifically assessed in the SA.
MM66	7.26	*Recycling and Recovery* North London has a number of facilities which manage ~~one~~ hazardous waste ~~treatment facility~~ alongside other non- hazardous waste. The majority of these are ~~include~~ vehicle depollution (car breakers) and metal recycling sites ~~WEEE sites~~. There are also transfer facilities ~~as well as~~ such as RRCs which will accept some hazardous waste, for example, paints and batteries which require specialist treatment and disposal. Such sites will continue to make a valuable contribution to managing North London's hazardous waste requirements. The amount of hazardous waste managed in North London varies from year to year with a maximum capacity of around 4,250 ~~3,600~~ tonnes over the last five years. ~~per annum and two recycling facilities; one for metals and one for end of life vehicles handling around 2,500 tonnes per annum between them. In addition, other facilities permitted to manage hazardous waste~~	0 Neutral These amendments correct erroneous baseline information regarding hazardous waste management facilities in North London. These changes do not have an impact on the sustainability of the plan.	Not specifically assessed in the SA.
MM67	7.27	There is a capacity gap for the ~~recovery~~ management of around 49,000 ~~2,500~~tonnes per annum, ~~this is considered too small a figure to plan for provision of a new facility and as such a specific land requirement is not identified for this management option. There is a requirement for recycling of around 17,000 tonnes per annum,~~ requiring an estimated 4.9~~2~~ha of land. The North London Boroughs support the provision of such facilities in principle in the Priority Areas ~~appropriate locations~~ and will work with the GLA and other Boroughs across London to meet this need. It is noted in the sites and area profiles in Appendix 2 of the NLWP where a ~~site or area~~ Priority Area is not suitable for hazardous waste recycling and recovery facilities. Any applications for hazardous waste facilities in 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.	0 Neutral See MM40. A greater amount of land requirement for hazardous waste management has been determined. However, given that the overall	Not specifically assessed in the SA.

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
			land requirement has reduced in comparison to the Proposed Submission NLWP, this does not have any impact on the sustainability of the plan.	
MM68	Policy 1	Policy 1: Existing waste management sites All existing waste management sites identified in *Schedule 1: Existing safeguarded waste sites in North London*, and any other sites that are given planning permission for waste use, are safeguarded for waste use. Expansion or intensification of operations at existing waste sites will be ~~supported~~ permitted where the proposal is in line with relevant aims and policies in the North London Waste Plan, the London Plan, Local Plans and related guidance. Applications for non-waste uses on safeguarded waste sites will only be permitted where it is clearly demonstrated by the developer to the satisfaction of the relevant borough that compensatory capacity will be delivered in line with the Spatial Principles ~~Framework~~ on a suitable replacement site in North London that must at least meet, and, if possible, exceed, the maximum achievable throughput of the site proposed to be lost and help to promote the increased geographical spread of waste sites across the plan area. [*no underline*] Development proposals ~~in close proximity to existing safeguarded waste sites or sites allocated for waste use~~ which would prevent or prejudice the use of ~~those~~ existing waste sites for waste purposes will be resisted under the agent of change principle unless design standards or other suitable mitigation measures are adopted to ensure that the amenity of any new residents would not be significantly adversely impacted by the continuation of waste use at that location or suitable compensatory provision has been made for the waste use elsewhere within the Plan area. **This policy helps meet strategic objectives SO2 and SO3** **This policy contributes towards Spatial Principles ~~Framework~~ ~~components~~ A and C**	0 Neutral These are clarifications that serve the purpose of explaining that it is the role of the developer to ensure that any non-waste uses on a safeguarded waste site will not compromise the capacity of the site and do not impact the sustainability of the plan.	Section 4.3 Spatial Strategy (assessment of Spatial Principles); Section 4.3 Policies (assessment of Policy 1); Appendix 3
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.	0 Neutral This is a clarification for waste site operators and does not impact	Section 4.3 Policies (assessment of Policy 1); Appendix 3

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
			the sustainability of the plan.	
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.	+ Minor positive This has the potential to have a positive impact on the sustainability of the plan in relation to SA objective 12. By increasing waste processing capacity or catering for additional waste streams at existing sites, better use will be made of previously developed land or buildings.	Section 4.3 Policies (assessment of Policy 1); Appendix 3
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 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.	0 Neutral This provides clarification on how loss of waste capacity is to be avoided and these changes do not impact the sustainability of the plan.	Section 4.3 Policies (assessment of Policy 1); Appendix 3
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	0 Neutral These amendments provide clarification and further detail on	Section 4.3 Policies (assessment of Policy 1); Appendix 3

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
		the release of waste sites for other uses. During the Plan period, where waste sites shown in Schedule 1 are redeveloped for other uses ~~lost~~, ~~but~~ 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. [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.	the provision of compensatory capacity but these changes do not impact the sustainability of the plan.	
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.	0 Neutral This sets out the procedure for monitoring execution of Policy 1 but does not change the content of Policy 1. There is therefore no impact on the sustainability of the plan.	Section 4.3 Policies (assessment of Policy 1); Appendix 3
MM74	9.10	[…] The NPPF and the draft new London Plan (December 2019) sets out the 'Agent of Change' principle. This principle places the responsibility of mitigating the ~~noise~~ impact of noise, dust, vibration and other nuisance-generating activities (from existing noise-generating businesses) on the proposed new development. Developers proposing non-waste development in close proximity to existing waste sites should be aware of the potential impacts on existing waste operations and plan this into their development so as not to prevent or prejudice the continued waste use in that location, otherwise such developments will not be permitted. Accordingly proposed non-waste developments should be designed to protect both the amenity of potential new residential developments and the existing waste operation within that area.	0 Neutral Although the mitigation of dust, vibration and other nuisance-generating activities in addition to noise is a positive change, the requirement for developments to do this is a principle of the	Section 4.3 Policies (assessment of Policy 1); Appendix 3

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
			draft new London Plan and not the NLWP. It is therefore subject to its own SA and is not part of this assessment.	
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")[2]. 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 • 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.	0 Neutral These are factual clarifications that provide detail on the roles played by waste operators and regulators, and the existing requirements of each party. The addition of this text does not impact the sustainability of the plan. See MM103 for amendments to IN6.	Section 4.3 Policies (assessment of Policy 1); Appendix 3
MM76	Policy 2	**Policy 2: Priority Areas for new waste management facilities** Areas listed in *Schedule 2: ~~Areas suitable~~ Priority Areas for waste management* and *Schedule 3: ~~Areas~~ Priority Areas identified in LLDC Local Plan* are identified as suitable for built waste management facilities to meet the identified need set out in Tables 6 and 8.	+ Minor positive The additional criterion will have a positive impact on SA Objective 3.	Section 4.3 Policies (assessment of Policy 2); Appendix 2

[2] Activities under each category is set out in Schedule 1 Part 2 of the Environmental Permitting (England and Wales) Regulations 2016. Government guidance has been published for regulators of Part A1 Permits and Part A2 and B Permits which sets out their responsibilities.

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
		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 deliver a range of complementary waste management and secondary material processing facilities on a single site. Applications for waste management development within the ~~areas~~ Priority Areas identified in Schedule 3 will be assessed by the London Legacy Development Corporation. **This policy helps meet strategic objectives SO1, SO2, SO3 and SO5** **This policy contributes towards Spatial Principles ~~Framework components~~ B, C and E ~~F~~**	By having a greater geographical spread of waste sites, the need to travel long distance to waste facilities will likely decrease. The encouragement of development of materials and waste management sites that serve multiple purposes creates greater potential for the plan to deliver efficient and productive waste management facilities. This would be through, for example, the reduction in overall transport distances for waste and the scope to develop innovative and complementary technologies. This will therefore have a positive impact on the sustainability of the plan in relation to SA Objectives 3 and 13.	(assessment of Spatial Principle B); Appendix 3
MM77	Schedules 2 and 3		0 Neutral	Section 4.3 Policies

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<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for SA</th><th>Reference location in 2019 SA</th></tr>
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Table 1: Schedule 2 ~~Areas suitable~~ Priority Areas for waste management
<table>
<tr><th rowspan="2">Area ref</th><th rowspan="2">Area Name</th><th rowspan="2">Size ~~Area~~ (ha)</th><th rowspan="2">Borough</th><th colspan="5">Waste Facility Type</th></tr>
<tr><th>A</th><th>B</th><th>C</th><th>D</th><th>E</th></tr>
<tr><td>A02-BA</td><td>Oakleigh Road</td><td>0.99</td><td>Barnet</td><td>X</td><td></td><td>X</td><td></td><td>X</td></tr>
<tr><td>A03-BA</td><td>Brunswick Industrial Park</td><td>3.9</td><td>Barnet</td><td>X</td><td></td><td></td><td></td><td>X</td></tr>
<tr><td>A04-BA</td><td>Mill Hill Industrial Estate</td><td>0.9</td><td>Barnet</td><td>X</td><td></td><td></td><td></td><td>X</td></tr>
<tr><td>A05-BA</td><td>Connaught Business Centre</td><td>0.9</td><td>Barnet</td><td>X</td><td></td><td></td><td></td><td>X</td></tr>
<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>~~X~~</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 ~~Areas~~ Priority Areas identified in LLDC Local Plan
<table>
<tr><th rowspan="2">Area ref</th><th rowspan="2">Area Name</th><th rowspan="2">Size ~~Area~~ (ha)</th><th rowspan="2">Borough</th><th colspan="5">Waste Facility Type</th></tr>
<tr><th>A</th><th>B</th><th>C</th><th>D</th><th>E</th></tr>
<tr><td>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>This corrects the waste facility type for the Millfields LSIS area and updates terminology used, for clarity. These amendments do not have an impact on the sustainability of the plan.</td>
<td>(assessment of Policy 2) ; Appendix 3</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 ~~areas~~ Priority Areas for new waste facilities and their suitability for a range of built waste management facilities. These Priority Areas have been assessed against national, regional and local criteria, including the Strategic Objectives and Spatial Principles, and represent the most suitable areas for new waste facilities in North London. To help redress the high proportion of North London’s waste facilities already in Enfield (62%), and help deliver a better geographical spread of sites (Spatial Principle B), developers wishing to provide additional waste capacity on a new site in North London are required to demonstrate that no land is available or suitable in Priority Areas outside of Enfield before considering the Priority Area identified within the Borough. 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</td>
<td>+ Minor positive
See MM76.
There is also additional text providing clarification on the sequential approach to provision of a better</td>
<td>Section 4.3 Policies (assessment of Policy 2); Appendix 2 (assessment of Spatial Principle B); Appendix 3</td>
</tr>
</table>

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
		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.	geographical spread of waste sites. The delivery of a better geographical spread of sites was already identified as a goal as part of Policy 2.	
MM79	9.13	In Schedules 2 and 3, the NLWP identifies thirteen ~~several~~ ~~areas~~ Priority Areas to provide land suitable for the development of waste management facilities, including RRCs (see Policy 4). Each ~~'area'~~ Priority Area comprises ~~a number of individual plots of land, for example,~~ an industrial estate or employment area that is in principle suitable for waste use ~~but where land is not safeguarded for waste~~. The identification of ~~areas~~ Priority Areas ~~suitable~~ for waste uses, subject to detailed site assessment at planning application stage, will help to achieve net self-sufficiency whilst encouraging co-location of facilities and complementary activities (an objective of the NPPW and Spatial Principle C ~~Framework~~). Areas listed in Schedule 2: ~~Areas~~ Priority Areas listed in *Schedule 2: ~~Areas suitable~~ Priority Areas for waste management* and *Schedule 3: ~~Areas~~ Priority Areas identified in LLDC Local Plan* suitable for waste management and Schedule 3: Areas identified in LLDC Local Plan suitable for new waste facilities will be identified in borough policies maps, and any new waste sites will be safeguarded and identified in borough policies maps.	0 Neutral These amendments are for clarification purposes, to update terminology and to signpost the link from Policy 2 to Schedules 2 and 3, to Policy 4 and to the specific Spatial Principle of relevance. These changes do not have an impact on the sustainability of the plan.	Section 4.3 Policies (assessment of Policy 2); Appendix 3
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.	0 Neutral These amendments provide clarity about how monitoring will support the delivery of the plan. They do not change the substance of the plan itself so there will be no impact on the	Not specifically assessed in the SA.

CAPITA

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
			sustainability 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.	0 Neutral These amendments provide clearer directions to potential developers. This does not constitute a change to the area profiles so there is no impact on the sustainability of the plan.	Appendix 5
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.	0 Neutral These amendments are to provide clarity on the purpose of the Priority Areas and to link to Strategic Objective 1. This does not constitute a change in the content of the plan so there are no implications with regards to sustainability.	Section 4.2 (Sites and Areas); Section 4.3 (Area Allocations) and Appendix 5
MM83	Policy 3	**Policy 3: Windfall Sites** Applications for waste development on windfall sites outside of the existing sites and ~~areas~~ Priority Areas for new waste management facilities identified in Schedules 1,2 and 3 will be permitted provided that the proposal can demonstrate that: a) the sites and ~~areas~~ Priority Areas identified in Schedules 1, 2 and 3 are not available or suitable for the proposed use or the proposed site would be better suited to meeting the identified need having regard to the Spatial Principles; New) sites have first been sought outside Enfield before sites within Enfield were considered, and that no sites outside Enfield are available or suitable, in line with Spatial Principle B;	+ Minor positive These amendments demonstrate how Spatial Principle B is to be delivered by including an additional criterion to seek	Section 4.3 Policies (assessment of Policy 3); Appendix 2 (assessment of Spatial Principle B); Appendix 3

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
		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**	locations outside of Enfield as a priority. This requirement will help ensure delivery of a wider geographical distribution of waste sites, thus reducing waste movements and waste-related travel, therefore resulting in a positive impact on the plan in relation to SA Objective 3.	
MM84	9.23	Developers of windfall sites are required to demonstrate why it is not possible to use, expand or intensify an existing waste site set out in Schedule 1 or why ~~the~~ sites ~~and~~ in the ~~areas~~ Priority Areas in Schedules ~~1,~~ 2 and 3 are not available or suitable. In addition, to help address concerns that there is a high proportion of North London's waste facilities already in Enfield, and help deliver a better geographical spread of sites (Spatial Principle B), developers are required to demonstrate that no sites are available or suitable outside of Enfield before considering those within the Borough. The exception to this is for Recycling and Reuse Centres (RRCs) where there is an identified need in Enfield and Barnet to improve the coverage across North London (see Policy 4). The evidence will need to demonstrate an adequate search has been undertaken which takes into account the type of waste facility proposed, the criteria set out in Table 10 and the criteria set out in policy 6. [split paragraph] Developers proposing waste sites outside the Priority Areas will be expected to demonstrate ~~or~~ that the proposed site would be better suited to meeting the identified need for North London having regard to delivering the Spatial Principles of the NLWP. For example a windfall site may deliver a better geographic spread of facilities in North London (Spatial Principle B), or there may be an opportunity to co-locate a recycling facility with a reprocessing plant (Spatial Principle C) or an opportunity for small scale expansion of an existing site onto adjacent land which helps facilitate the maximum use of an existing waste site and enable co-location of facilities. There may be instances in the future where advances in waste technologies are such that existing sites or Priority Areas ~~the identified sites/areas~~ do not meet the technical requirements of a proposed waste management facility, for example, the identified locations might be too small for the proposed development or the facility may need to be 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.	0 Neutral These amendments serve to provide clarity on how the requirements of the plan – Spatial Principles B and C – will be delivered. This text refers to the additional criterion in Policy 2 and provides further explanation for when development of a waste site that is not in a Priority Area would be permitted. These changes are for clarity and do not impact the sustainability of the plan.	Section 4.3 Policies (assessment of Policy 3); Appendix 3

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Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
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 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~~.	0 Neutral These amendments serve to provide clarity on how Spatial Principle B will be delivered, with reference to the additional criterion in Policy 2. These changes themselves will not have an impact on the sustainability of the plan.	Section 4.3 Policies (assessment of Policy 3); Appendix 3
MM86	Policy 4	**Policy 4 – Re-use & Recycling Centres** Proposals for Re-use & Recycling Centres will be permitted where: a) They improve the coverage of centres across the North London Boroughs, in particular ~~are sited~~ in an area of identified need for new facilities in Barnet or Enfield ~~or elsewhere where they improve the coverage of centres across the North London Boroughs~~, and; b) They are in line with relevant aims and policies in the North London Waste Plan, London Plan, Local Plans and other related guidance. **This policy helps meet strategic objectives SO1, SO2 and SO3** **This policy contributes towards Spatial ~~Framework~~ Principles ~~components~~ A and B**	0 Neutral These amendments are for clarity to strengthen the link of this policy with the Spatial Principles. They do not constitute changes that would impact the sustainability of the plan.	Section 4.3 Policies (assessment of Policy 4); Appendix 3
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.	0 Neutral See MM84.	Section 4.3 Policies (assessment of Policies 3 and 4); Appendix 3
MM88	Policy 5	**Policy 5: Assessment Criteria for waste management facilities and related development** Applications for waste management facilities and related development, including those replacing or expanding existing sites, will be required to demonstrate to the satisfaction of the relevant Borough that: New after a) the proposal maximises the waste management capacity of the site	+ Minor positive The addition of a criterion to ensure maximisation of the waste management	Section 4.3 Policies (assessment of Policy 5); Appendix 3

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
		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**	capacity on site will have a positive impact on SA Objective 12, as it will encourage efficient use of land for waste management facilitates. There will also be a positive impact on SA Objectives 8 and 9, as the expected outcome with relation to reducing the impacts of climate change is clearer and more explicit than the Proposed Submission NLWP. The other amendments to Policy 5 are for clarity and to strengthen the link of this policy with the Spatial Principles so will not have an impact on the sustainability of the 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, 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	+ Minor positive These amendments have a positive impact on SA Objective 1 by placing requirements on waste facilities to minimise health	Section 4.3 Policies (assessment of Policy 5); Appendix 3

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
		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.	impacts as well as amenity impacts.	
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.	0 Neutral This amendment draws a narrative link between the additional criterion added to Policy 5 (see MM88) and the draft new London Plan. This amendment in and of itself does not constitute a change that will impact the sustainability of the plan.	Section 4.3 Policies (assessment of Policy 5); Appendix 3
MM91	9.37	The supporting documents should set out how landscape proposals can be incorporated as an integral part of the overall development of the site and how the development contributes to the quality of the wider urban environment. The applicant will need to demonstrate that there will be no significant adverse effect on areas or features of landscape~~, historic~~ or nature conservation value. Where relevant, applications for waste management facilities and related development will be required to demonstrate that they conserve and where appropriate enhance heritage assets and their settings, including consideration of non-designated archaeology where relevant ~~the delivery of waste facilities (through construction to operation) should take account of the need to conserve and enhance the historic environment~~ in line with the NPPF.	+ Minor positive This amendment brings the plan in line with the NPPF by ensuring consideration of non-designated archaeology in addition to other heritage assets. As such, it will have a positive impact on SA Objective 4.	Section 4.3 Policies (assessment of Policy 5); Appendix 3
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.	+ Minor positive These amendments state and further emphasise the requirement to prioritise sustainable modes	Section 4.3 Policies (assessment of Policy 5); Appendix 3

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
		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.	of transport, which will have a positive direct impact on SA Objectives 3 and 9 and a potential secondary positive impact on SA Objective 1.	
MM93	9.41	Applicants will need to submit a **Transport Assessment** in line with the relevant borough Local Plan policy and the London Plan. The Transport for London Best Practice Guide contains advice on preparing Transport Assessments when they are required to be submitted with planning applications for major developments in London. Consideration should be given to access arrangements, safety and health hazards for other road users, the capacity of local and strategic road networks, impacts on existing highway conditions in terms of traffic congestion and parking, on-site vehicle manoeuvring, parking and loading/unloading areas, and queuing of vehicles. The Assessment ~~statement~~ should include a traffic management plan establishing the times of access for vehicles to minimise disruption on the local road network during peak hours, and setting out specific routes to ensure that vehicles are accessing the site via roads considered suitable by the Highways Authority and, where possible, avoid overlooking of the site access by residential properties. The Assessment should cover the types of vehicles to be used, including opportunities to use low emission vehicles, alternatives to vehicles powered by the internal combustion engine, and the provision of any infrastructure at future or expanded waste sites to accommodate this. The statement should also cover emission standards and fuel types in line with national and regional air quality standards.	+ Minor positive See MM92. This amendment provides additional guidance to ensure that sustainable transport modes, including low emission vehicles, are fully considered.	Section 4.3 Policies (assessment of Policy 5); Appendix 3
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.	0 Neutral This provides additional clarity with regards to the plan's approach to sustainable transport and alignment of the NLWP with wider London Plans but will not directly result in an impact on the sustainability of the plan.	Section 4.3 Policies (assessment of Policy 5); Appendix 3
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. […]	0 Neutral This amendment is for clarification purposes, to bring	Section 4.3 Policies (assessment

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
			the plan in line with the NPPF. This does not impact the sustainability of the plan.	of Policy 5); Appendix 3
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 (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.	0 Neutral This amendment is for clarification purposes, to bring the plan in line with the NPPF. This does not impact the sustainability of the plan.	Section 4.3 Policies (assessment of Policy 5); Appendix 3
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 ~~s~~ are required to ~~should~~ generate energy, ~~and/or~~ recover excess heat ~~(including the recovery of energy from gas)~~ and provide a supply to networks including decentralised energy networks unless it is not technically feasible or economically viable to do so. Developers must demonstrate how they meet these requirements as part of a submitted Energy Statement Where there is no available decentralised energy network and no network is planned within range of the development, as a minimum requirement the proposal should recover energy through electricity production and be designed to enable it to deliver heat and/or energy and connect to a Decentralised Energy Network in the future. ~~Developers must demonstrate how they meet these requirements, or provide evidence if it is not technically feasible or economically viable to achieve them, as part of a submitted Energy Statement.~~ **This policy helps meet strategic objectives SO1 and SO6** **This policy contributes towards Spatial ~~Framework~~ Principles ~~component~~ D**	0 Neutral This amendment is for clarification purposes and does not impact the sustainability of the plan.	Section 4.3 Policies (assessment of Policy 6); Appendix 3
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	0 Neutral This modification brings the wording of the NLWP in	Section 4.3 Policies (assessment of Policy 6);

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
		Meridian Water should ensure that the openness and permanence of the Green Belt is maintained in accordance with draft New London Plan Policy G2.	line with the draft New London Plan and does not constitute a change in the substance of the plan. There are therefore no implications on the sustainability of the plan.	Appendix 3
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**	0 Neutral This modification brings the wording of the NLWP in line with the draft New London Plan and does not constitute a change in the substance of the plan. There are therefore no implications on the sustainability of the plan.	Section 4.3 Policies (assessment of Policy 7); Appendix 3
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~~ Restoring former mineral working sites; or b) Facilitating an improvement in the quality of land; or c) Facilitating the establishment of an appropriate use in line with other policies in the Local Plan; or d) Improving land damaged or degraded as a result of existing uses and where no other satisfactory means exist to secure the necessary improvement. ~~Where one or more of the above criteria (a-d) are met, a~~ All proposals using inert waste should:	+ Minor positive This amendment states the requirement to move management up the waste hierarchy, thereby resulting in a positive impact on SA Objective 11.	Section 4.3 Policies (assessment of Policy 8); Appendix 3

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
		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 always be viewed as a waste once it has become a controlled waste outside of the Definition of Waste Code of Practice.	0 Neutral This modification brings the wording of the NLWP in line with the draft New London Plan and does not constitute a change in the content of the plan. There are therefore no implications on the sustainability of the plan.	Section 4.3 Policies (assessment of Policy 8); Appendix 3
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.	0 Neutral This clarifies how the plan will be supported by monitoring, which does not have an impact on the sustainability of the plan.	Not specifically assessed in the SA.

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for SA</th><th>Reference location in 2019 SA</th></tr>
<tr><td>MM103</td><td>10.6 Table 14</td><td>
<table>
<tr><th></th><th>Indicator</th><th>Target(s)</th><th>What it monitors</th><th>Outcome(s) sought</th></tr>
<tr><td>IN1</td><td>Waste arisings (Table 6) by waste stream and management route

~~5. Total quantity of waste arisings managed by waste stream (LACW, C&I and CD&E) and management route (recycling/composting, recovery and disposal)~~

~~11. Number of developments permitted which include disposal of inert waste to land~~</td><td>Waste arisings and management in line with forecasts in Table 6 (Baseline Table 3)

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

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

~~Waste Policy and London Plan targets~~

~~Ensure the NLWP delivers a net self-sufficient waste management outcome for the principal waste streams~~

~~To ensure that proposals involving the importation and disposal of inert waste to land are achieving in line~~</td></tr>
</table>
</td><td>IN1: 0 Neutral
The changes to this monitoring indicator will not impact the sustainability of the plan.

IN2: 0 Neutral
The changes to this monitoring indicator will not impact the sustainability of the plan.</td><td>Not specifically assessed in the SA.</td></tr>
</table>

CAPITA

Reference	Section	Further modification					Implications for SA	Reference location in 2019 SA
						~~with waste hierarchy.~~	IN3: 0 Neutral The changes to this monitoring indicator will not impact the sustainability of the plan.	
		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)~~ ~~4. Loss of existing waste capacity and provision of replacement capacity~~	Capacity to meet net self-sufficiency targets in Tables 6 and 8 Zero loss of capacity Replacement ~~locally,~~ within ~~the Borough,~~ North London ~~or London~~ Replacement capacity for Brent Cross Cricklewood provided within Barnet ~~Capacity sufficient to manage capacity requirements as set out in Table 6 Capacity Gaps.~~	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 Policy 2: Area allocations Policy 3: Unallocated sites Policy 4. Reuse and Recycling Centres Policy 7 Waste Water Treatment	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~~ Ensure that capacity is replaced locally unless net self-sufficiency has been met ~~valid planning reasons are provided for not doing so.~~	IN4: 0 Neutral The changes to this monitoring indicator will not impact the sustainability of the plan.	

Reference	Section	Further modification					Implications for SA	Reference location in 2019 SA
				~~New waste facilities in line with Table 7: land take requirements~~	Works and Sewage Plant Policy 8 Control of Inert Waste		IN5: ++ Major positive This new indicator implements monitoring procedures to ensure that the positive outcomes identified in relation to SA Objectives 1, 3 and 9 are realised.	
			IN3	Location of new waste facilities and compensatory capacity ~~1. Amount of Land within identified areas or on windfall sites brought forward for waste use during the plan period.~~	Land within Schedules 1, 2, 3 ~~In line with Table 7: landtake requirements~~	SO2 (capacity provision) Policy 1: Existing waste management sites Policy 2: Area allocations Policy 3: Unallocated sites	To check that identified sites and areas are being taken up as anticipated. To monitor if land within Schedules 1, 2 and 3 is not available or suitable for new waste facilities.	IN6: 0 Neutral These amendments are for clarity and do not change the substance of the indicator. There is therefore no impact on the sustainability of the plan.	
			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	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	

Reference	Section	Further modification					Implications for SA	Reference location in 2019 SA
			review of the London Plan or Local Plan			levels of waste expected across North London over the plan period as set out in Table 8.	IN7: 0 Neutral The changes to this monitoring indicator will not impact the sustainability of the plan.	
		IN5	The number of sites consented that offer non-road transport options, the number of those sites where such options have been implemented and the total tonnage transported through non-road options (where known).	Facilities where non-road forms of transport are used to move waste and recycling	SO5 (sustainability) SO7 (sustainable transport) Spatial Principle F (sustainable transport)	Reduce impact on climate change Improve amenity		
		IN6	Enforcement action taken against waste sites by the local authority and/or Environment Agency on breach of planning conditions or environmental permit ~~7. Number of approvals for new waste facilities which~~	Zero ~~100%~~	SO5 (sustainability) SO8 (protect the environment) Spatial Principles ~~framework~~ (Reduce impact on amenity) Policy 5: Assessment Criteria for waste management	To ensure sites do not cause harm to the environment or local communities ~~Avoid impact on sensitive receptors or maximise scope for effective mitigation~~	IN8: 0 Neutral The changes to this monitoring indicator will not impact the sustainability of the plan.	

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for SA</th><th>Reference location in 2019 SA</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td></td><td>~~meet legislative requirements~~</td><td></td><td>facilities and related development</td><td></td></tr>
<tr><td>IN7</td><td>~~6.~~ Amount of waste imported and exported ~~to landfill~~ by waste stream and management route ~~(LACW, C&I and CD&E)~~</td><td>Exported waste to landfill in line with Table ~~69~~ of the NLWP

Reduction in waste exports</td><td>Net self-sufficiency

Changes to imports and exports</td><td>Waste exports are in line with those estimated in the NLWP and through the duty to co-operate</td></tr>
<tr><td>IN8</td><td>~~8.~~ Number of new CHP facilities serving district heat networks in which the principal fuel source is residual waste or recovered waste fuel</td><td>Monitor only</td><td>Strategic Aim (green London)</td><td>Monitor only</td></tr>
<tr><td>IN9</td><td>~~9.~~ 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 North London over the plan period</td></tr>
</table>
</td><td>IN9: 0 Neutral
The changes to this monitoring indicator will not impact the sustainability of the plan.</td><td></td></tr>
<tr><td>MM104</td><td>Table 15</td><td>
Table 15: Roles and responsibilities involved in implementing the Plan
<table>
<tr><th>Organisation</th><th>Role</th><th>Responsibilities</th></tr>
<tr><td>Local planning authorities (including London Legacy</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</td></tr>
</table>
</td><td>0 Neutral
These changes have no impact on the sustainability of the plan.</td><td>Not specifically assessed in the SA.</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for SA</th><th>Reference location in 2019 SA</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>Development Corporation)</td><td></td><td>development and regeneration objectives</td></tr>
<tr><td></td><td>Regulate / monitor</td><td>Inspect operating waste sites periodically
<u>Appoint a lead borough to monitor the plan and carry out the duty to co-operate when required</u>
<u>Publish annual monitoring reports in the NLWP</u>
<u>~~Monitor Plan performance annually~~</u></td></tr>
<tr><td></td><td>Performance delivery</td><td>Support / promote waste reduction initiatives through the planning system</td></tr>
</table>
</td><td></td><td></td></tr>
<tr><td>MM105a</td><td>Schedule 1</td><td>
<u>~~Table 3:~~</u> Schedule 1: Existing safeguarded waste sites in North London
<table>
<tr><th>Site ID</th><th>Site Name</th><th><u>Site Address</u></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><u>~~Borough~~</u></th></tr>
<tr><td><u>BAR1</u></td><td><u>Winters Haulage, Oakleigh Road South</u></td><td><u>British Rail Sidings, Oakleigh Road South, Southgate, London, N11 1HJ</u></td><td><u>C&I / CDE</u></td><td><u>X</u></td><td><u>10,495</u></td><td><u>38,503</u></td><td><u>40,409</u></td><td><u>35,379</u></td><td><u>0</u></td><td></td></tr>
<tr><td>BAR 2</td><td>Scratchwood Quarry</td><td><u>London Gateway Service Area, M1 Motorway, Mill Hill, London, NW7 3HU</u></td><td><u>CDE</u></td><td><u>✓</u></td><td><u>52,835</u></td><td><u>71,046</u></td><td><u>99,060</u></td><td><u>102,527</u></td><td><u>131,505</u></td><td><u>~~Barnet~~</u></td></tr>
<tr><td>BAR 3♦</td><td>P B Donoghue, Claremont Rd</td><td><u>3 Shannon Close, Claremont Rd, Cricklewood, London, NW2 1RR</u></td><td><u>CDE</u></td><td><u>✓ (96%)</u></td><td><u>0</u></td><td><u>118,964</u></td><td><u>112,449</u></td><td><u>112,487</u></td><td><u>111,226</u></td><td><u>~~Barnet~~</u></td></tr>
</table>
</td><td>0 Neutral
The additional information, correction and amendments here are for ease of reference and to align with changes made elsewhere in the plan and do not change the substance of the plan. There is therefore no impact on the sustainability of the plan.</td><td>Not specifically assessed in the SA.</td></tr>
</table>

CAPITA

Reference	Section	Further modification										Implications for SA	Reference location in 2019 SA
		BAR 4♦	W R G, Hendon Rail Transfer Station	Hendon Rail Transfer Station, Brent Terrace, Hendon, London, NW2 1LN	LACW	X	153,952	164,129	114,457	128,605	142,107	~~Barnet~~		
		BAR 5	Summers Lane Reuse and Recycling Centre	Civic Amenity & Waste Recycling Centre, Summers Lane, London, N12 0RF	LACW	X	15,612	16,361	17,206	10,584	18,237	~~Barnet~~		
		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~~		
		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,~~	Railway Arches, Colindeep Lane, Hendon, London, NW9 6HD	C&I	N/A	0	0	0	0	0	~~Barnet~~		

Reference	Section	Further modification										Implications for SA	Reference location in 2019 SA
			~~Hendon~~ Savacase Ltd)										
		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~~ Mill Hill Depot	Upside Railway Yard, Brent Terrace, Cricklewood, London, NW2 1LN	CDE	X	0	0	0	0	234,930	~~Barnet~~	
		CAM1	Regis Road Reuse and Recycling Centre	Regis Road, Kentish Town, London NW5 3EW	LACW	X	-	2,535	5,409	5,595	5,119	~~Camden~~	
		ENF 1	Crews Hill Transfer Station	Kingswood Nursery, Theobalds Park Road, Crews Hill, Enfield, 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 Complex	Motor Salvage Complex, Mollison Avenue, Brimsdown, Enfield, Middlesex, EN3 7NJ	C&I	✓	63	63	26	29	37	~~Enfield~~	

Reference	Section	Further modification										Implications for SA	Reference location in 2019 SA
		~~ENF 4~~	~~Chase Farm Hospital, The Ridgeway (SITA)~~		C&I (clinical)	✓	1,615	1,705	2,396	2,276	-	~~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, London, N18 3PP	C&I / CDE	X	16,855	27,043	28,566	23,004	21,974	~~Enfield~~	
		ENF 7	Vacant (formerly Budds Skips) ~~, The Market 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, Edmonton, London, N18 1SY	C&I / CDE	✓	9,935	-	20,359	-	8,719	~~Enfield~~	
		ENF 10	Rooke & Co Ltd, Edmonton	Montague Road Industrial	C&I	✓	32,249	24,867	28,095	25,235	3,897	~~Enfield~~	

Reference	Section	Further modification										Implications for SA	Reference location in 2019 SA
				Estate, 22-26 First Avenue, Edmonton, London, N18 3PH									
		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	-		
		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		
		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		
		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		
		ENF 17	Albert Works~~, Kenninghall Road, Edmonton~~	Albert Works, Kenninghall Road, Edmonton, London, N18 2PD	C&I	✓	193,308	224,020	233,225	211,424	-		

Reference	Section	Further modification										Implications for SA	Reference location in 2019 SA
		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 Ecopark, Advent Way, Edmonton, London, N18 3AG	LACW	✓	58,255	106,341	112,419	109,114	101,189		
		~~ENF 19~~	~~London Waste Ltd Composting, Edmonton 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~~		Hazardous (WEEE)	✓	2,447	1,327	9,194	11,400	67	~~Enfield~~	

Reference	Section	Further modification										Implications for SA	Reference location in 2019 SA
			~~Ecopark, Advent Way~~										
		~~ENF 22~~	~~Edmonton Clinical Waste Treatment Centre~~		C&I / CDE	✓	27,319	18,664	43,851	23,490	49,754	~~Enfield~~	
		ENF 23	J O' Doherty Haulage, Nobel Road, Edmonton	Pegamoid Site, Nobel Road, Edmonton, London, N18 3BH	C&I / CDE	✓	0	7,150	26,545	15,501	11,337	~~Enfield~~	
		ENF 24	Oakwood Plant Ltd, Edmonton	Oakwood House, Nobel Road, Eley Industrial Estate, Edmonton, London, N18 3BH	C&I / CDE	✓	-	8,892	13,652	7,344	-	~~Enfield~~	
		ENF 25	Environcom Ltd (Edmonton Facility) ~~, Stonehill Business Park, Edmonton~~	Unit 8a Towpath Road Stonehill Business Park, N18 3QU		-	14,992	33,720	4,200	0	0	~~Enfield~~	
		ENF 26	Powerday Plant Ltd, Jeffreys Road	Unit 2, Jeffrey's Road, Brimsdown, Enfield, Middlesex, EN3 7UA	Hazardous (C&I)	✓	-	-	-	-	6,557	~~Enfield~~	
		~~ENF 27~~	~~Edmonton EFW~~		CDE	✓						~~Enfield~~	
		ENF30	Hunsdon Skip Hire (Previously L&M Skips and London &	Unit 1, 1b Towpath Rd, Stonehill Business Park, London, N18 3QX	C&I	X	17,466	17,124	19,231	19,507	18,427		

Reference	Section	Further modification										Implications for SA	Reference location in 2019 SA
			Metropolitan Recycling)										
		ENF 31	Volker Highways Ltd	15 Edison Road, Brimsdown Industrial Estate, Enfield EN3 7BY	LACW	X	10,715	14,556	13,837	11,541	16,923	~~Enfield~~	
		~~ENF 32~~	~~Guy Lodge Farm~~		C&I	✓	63	63	26	29	37	~~Enfield~~	
		~~ENF 33~~	~~Ballast Phoenix Ltd~~		C&I (clinical)	✓	1,615	1,705	2,396	2,276	-	~~Enfield~~	
		~~ENF 34~~	~~London & Metropolitan Recycling Facility~~		LACW	✓ (76%)	16,115	11,732	12,659	10,125	15,410	~~Enfield~~	
		ENF 35	Redcorn (ELV) ~~Unit 25 Enfield Metal Kingswood Nursery, Theobalds Park road~~	22a & 24, Stacey Avenue, Montagu Industrial Estate, Enfield, N18 3PS	C&I / CDE	X	16,855	27,043	28,566	23,004	21,974	~~Enfield~~	
		~~ENF 36~~	~~Greenstar Environmental~~		C&I / CDE	-	834	802	1,778	0	0	~~Enfield~~	
		ENF37	GBN	Gibbs Road, Montagu Industrial Estate, London, N18 3PU	LACW / C&I	✓ (84%)	231,771	72,530	271,888	276,855	270,106		
		HAC 1	Millfields Waste Transfer & Recycling Facility	Millfields Recycling Facility, Millfields Road, Hackney, London, E5 0AR	LACW	X	18,202	13,935	14,173	16,785	16,725	~~Hackney~~	

Reference	Section	Further modification										Implications for SA	Reference location in 2019 SA
		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 Lane, Tottenham	44 White Hart Lane, Tottenham, London N17 8DP	C&I	✓	15,712	22,733	23,852	8,508	-	~~Haringey~~	
		HAR 6	Restore Community Projects~~, Ashley Road, Tottenham~~	Unit 18, Ashley Road, Tottenham Hale, London, N17 9LJ	C&I	✓	24	103	185	278	98	~~Haringey~~	
		HAR 7	Redcorn 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~~	82 Markfield Road, Tottenham,	CDE	✓	5,079	27,330	31,460	25,674	123,308	~~Haringey~~	

Reference	Section	Further modification										Implications for SA	Reference location in 2019 SA
			~~Road, Tottenham~~	London, N15 4QF									
		HAR 9	Park View Road Reuse and Recycling Centre	Civic Amenity Site, Park View Road, Tottenham, London, N17 9AY	LACW	X	3,706	2,409	6,326	5,499	5,745	~~Haringey~~	
		HAR 10	~~LondonWaste Ltd.~~ Western Road Re-use & Recycling Centre ~~H W R C~~	Western Road, Haringey N22 6UG	LACW	X	0	0	2,526	4,851	3,799	~~Haringey~~	
		HAR11	Durnford Street Car Dismantlers & Breakers	6-40, Durnford Street, Tottenham, London, N15 5NQ	C&I	✓	0	0	0	432	288		
		ISL 1	Hornsey Household Re-use & Recycling Centre and Transfer Station	Hornsey Street, Islington London N7 8HU	LACW	X	196,818	195,018	203,919	204,496	212,232	~~Islington~~	
		WAF1	Mercedes Parts Centre	21 Chingford Industrial Estate, Hall Lane, Chingford, London, E4 8DJ	C&I	✓	0	0	0	0	7		
		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~~	

Reference	Section	Further modification										Implications for SA	Reference location in 2019 SA
		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 (previously T J Autos (U K) Ltd)	17 Rigg Approach, Leyton, London, E10 7QN	C&I	✓	53	53	81	21	11	~~Waltham Forest~~	
		~~WAF 6~~	~~B J Electronics, Ravenswood road Industrial Estate, Walthamstow~~									~~Waltham Forest~~	
		WAF 8	Leyton Reuse & Recycling Centre	Gateway Road, Leyton, London, E10 5BY	LACW	X	2,164	2,255	2,564	3,003	2,589	~~Waltham Forest~~	
		WAF9	Vacant (formerly B D & G Parts For Rover)	Roxwell Trading Park, Leyton	C&I	-	0	0	0	0	0		
		WAF 10	Malby Waste Disposal Ltd, Staffa Road, Leyton	5 Staffa Road, Leyton, London, E10 7PY	C&I / CDE	X	6,700	10,682	12,624	7,339	9,925	~~Waltham Forest~~	
		WAF 12~~1~~	Argall Metal Recycling ~~Baseforce Metals, Unit 1 Staffa Road, Leyton~~	Unit 1, Staffa Road, E10 7PY	C&I	✓	0	21,537	31,603	30,378	0	~~Waltham Forest~~	
		WAF 14	Tipmasters	15 Rigg Approach	C&I	X	0	0	586	2,847	3,622	~~Waltham Forest~~	

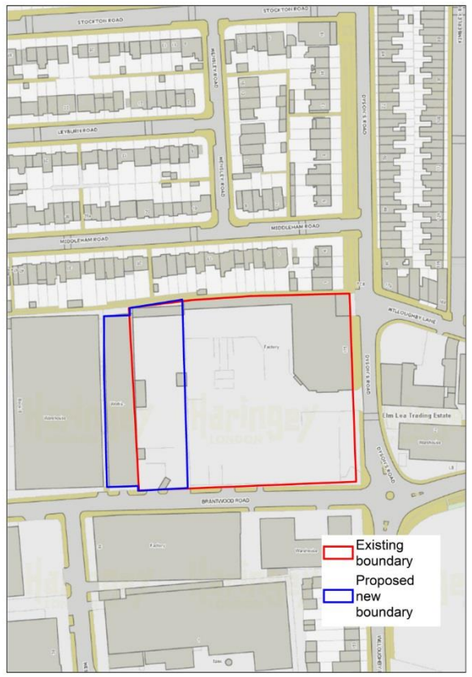
CAPITA

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA

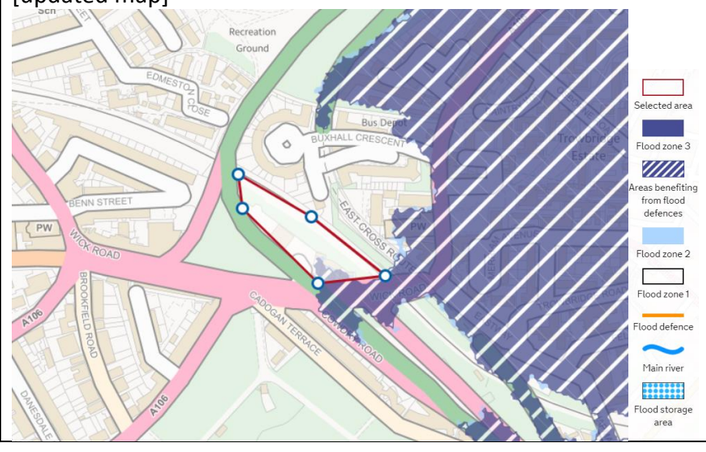
		London Greater London E10 7QN								
~~WAF 15~~	~~Bits and Parts~~									~~Waltham Forest~~
WAF16	Whipps Cross Hospital Clinical Waste Treatment Facility	Whipps Cross Hospital, Whipps Cross Road, London, E11 1NR	C&I (clinical)	X	0	0	0	0	5	

[footnote to BAR3, BAR4, BAR6 and BAR7]
These sites will be redeveloped under the 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 with a new facility ~~on site S01 BA~~ to meet the NLWA's requirements. Planning permission for a new Waste Transfer Station (WTS) ~~the new sites~~ at Geron Way was granted by Barnet Council ~~Planning Committee~~ 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 Southern phase of the BXC regeneration which has commenced ~~is expected to commence in the near term~~; replacement capacity for these sites will be sought in accordance with the planning permission for Brent Cross Cricklewood. The BAR3 site is identified for redevelopment in Phase 4 of the BXC regeneration ~~and is currently not anticipated to be redeveloped until after 2026~~. 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 ~~will~~ would need to be identified prior to its redevelopment and the London Borough of Barnet will seek to provide replacement capacity within the borough. ~~with~~ The Barnet Local Plan will identify~~ing~~ potential sites.

MM105b	HAR7	[Revision to safeguarded area for HAR 7 in Haringey's Policies Map and Update site map in Waste Data Study 3: Appendix 4 Haringey: HAR7]	0 Neutral The update to include a revised map does not impact on the sustainability of the plan.	Not specifically assessed in the SA.

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
				
MM106	Appendix 2: Barnet Area Profiles	A05-BA Connaught Business Centre **Historic Environment**: ~~No assets identified in vicinity.~~ Within Watling Street Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.	? Uncertain The potential for buried archaeological assets to be present in this area could result in a negative impact on SA Objective 4. Further archaeological assessment work would be required should proposals for a waste site in this area be	Section 4.2 (Sites and Areas); Section 4.3 (Area Allocations) and Appendix 5

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
			considered further.	
MM107	Appendix 2: Enfield Area Profiles	12-EN Eleys Estate, Enfield **Historic Environment**: Historic England commented that development should avoid harm to the historic environment and the setting of Chingford Mill Pumping Station (grade II) should be considered~~. The potential archaeology value of area should be considered~~ along with the setting of Montagu Road Cemeteries Conservation Area. 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.	? Uncertain The potential for buried archaeological assets to be present in this area could result in a negative impact on SA Objective 4. Further archaeological assessment work would be required should proposals for a waste site in this area be considered further.	Section 4.2 (Sites and Areas); Section 4.3 (Area Allocations) and Appendix 5
MM108	Appendix 2: Hackney Area Profiles	A15-HC Millfields LSIS **Historic Environment**: There are three Grade II listed buildings adjacent to the west of site: • Hackney Borough Disinfecting Station (on Heritage at Risk Register) • 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	? Uncertain The potential for buried archaeological assets to be present in this area could result in a negative impact on SA Objective 4. Further archaeological assessment work would be required should proposals for a waste site in this area be considered further.	Section 4.2 (Sites and Areas); Section 4.3 (Area Allocations) and Appendix 5

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
		potential for archaeological remains to be present and that further assessment should be undertaken.		
MM109	Appendix 2: Hackney LLDC Area Profiles	LLDC1-HC Bartrip Street Flood Risk: ~~Part of the southern area of Bartip St LSIS is within Flood Zone 2 (medium risk) although the area benefits from flood defences.~~ ~~The area is at risk from surface water flooding.~~ The site area is largely within Flood Zone 1 with the southern most part falling partially within Flood Zones 2 and 3, noting that the Flood Zone 3 is within an area benefiting from defence. The 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. 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] 	+ Minor positive Updated flood mapping shows that the proportion of the land in this area that falls within Flood Zone 2 has decreased considerably. The proportion of the area falling within Flood Zone 3, and benefitting from flood defences, is unchanged. It is now considered that the risk of flooding to the area is lower than previously reported. Therefore, there will be a positive impact on SA Objective 7. These amendments also bring the text in line with the approach outlined in the October 2019 Flood Risk Sequential Test Report, NPPF and NPPG and clarify that current climate change allowances should	

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for SA</th><th>Reference location in 2019 SA</th></tr>
<tr><td></td><td></td><td></td><td>be used in planning applications when prepared. These changes have no impact on the sustainability of the plan.</td><td></td></tr>
<tr><td>MM110</td><td>Appendix 2: Hackney LLDC Area Profiles</td><td>LLDC2-HC Chapman Road (Palace Close)

<table><tr><td>Flood Risk</td><td><s>Flood Zone 2 (Medium probability of flooding) however the area benefits from flood defences.</s>
<s>The area is at risk from surface water flooding.</s>

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]</td></tr></table></td><td>+ Minor positive

Updated flood mapping shows that the proportion of the land in this area that falls within Flood Zone 2 has decreased slightly. The majority of the area falls within Flood Zone 3 (and which benefits from flood defences) and this proportion remains unchanged. It is now considered that the risk of flooding to the area is lower than previously reported. Therefore, there will be a positive impact on SA Objective 7.

These amendments also bring the text in line with the approach outlined</td><td></td></tr>
</table>

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for SA</th><th>Reference location in 2019 SA</th></tr>
<tr><td></td><td></td><td>
</td><td>in the October 2019 Flood Risk Sequential Test Report, NPPF and NPPG and clarify that current climate change allowances should be used in planning applications when prepared. These changes have no impact on the sustainability of the plan.</td><td></td></tr>
<tr><td>MM111</td><td>Appendix 2: Haringey Area Profiles</td><td>A19-HR Brantwood Road

Flood Risk

~~The eastern section of the area lies within Flood Zone 2 (medium probability of flooding).~~
~~The area is at risk from surface water flooding.~~

The site area is largely Flood Zone 1 with the western most part of the site area falling partially within Flood Zone 2. The 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.

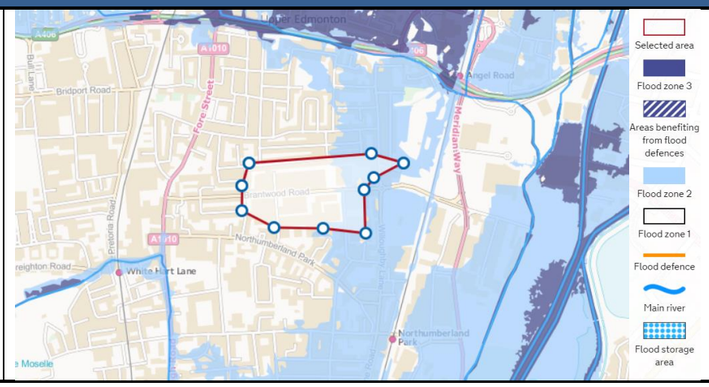
The site area is shown to flood from the Pymmes Brook in the 0.1% AEP event (without defences) and this will increase in the future as a result of climate change with 1% AEP event to cover approximately one quarter of the site area.

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.

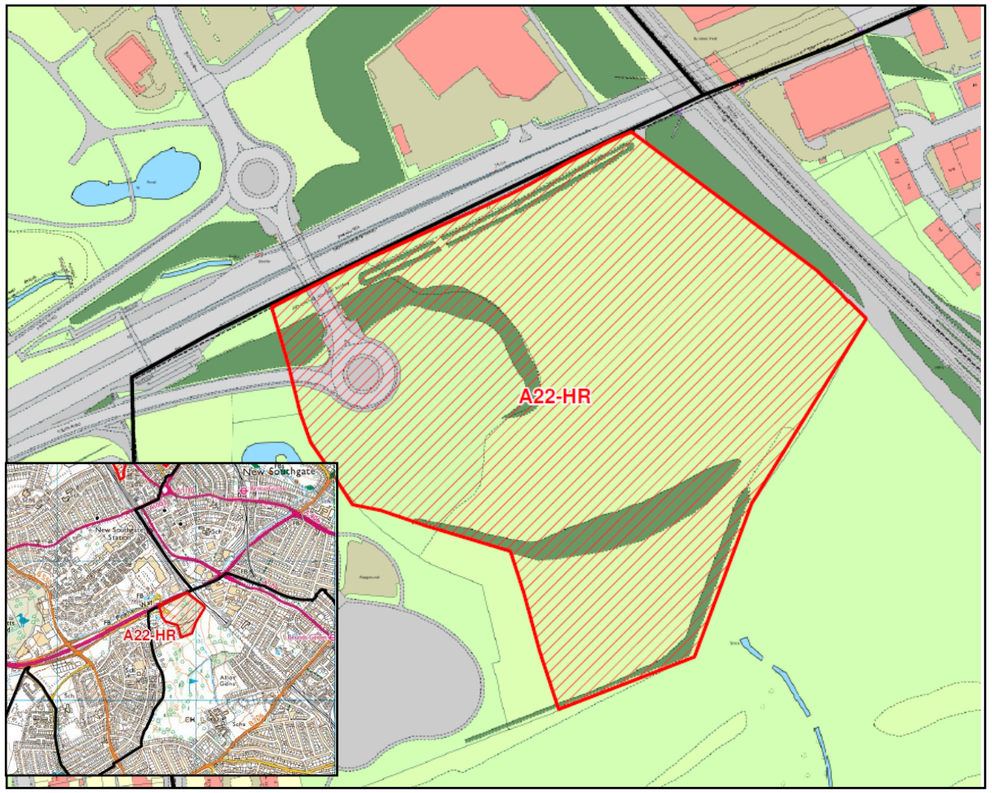
[updated map]</td><td>0 Neutral

Updated flood mapping shows that the proportion of the land in this area that falls within Flood Zone 2 has remained unchanged.

These amendments also bring the text in line with the approach outlined in the October 2019 Flood Risk Sequential Test Report, NPPF and NPPG and clarify that current climate change allowances should be used in planning applications when</td><td></td></tr>
</table>

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
			prepared. These changes have no impact on the sustainability of the plan.	
MM112	Appendix 2: Haringey Area Profiles	A21-HR North East Tottenham **Historic Environment**: ~~No assets identified in vicinity.~~ 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.	? Uncertain The potential for buried archaeological assets to be present in this area could result in a negative impact on SA Objective 4. Further archaeological assessment work would be required should proposals for a waste site in this area be considered further.	Section 4.2 (Sites and Areas); Section 4.3 (Area Allocations) and Appendix 5

MM113	Appendix 2: Haringey Area Profiles	A22-HR Pinkham Way **A22-HR – Friern Barnet Sewage Works (LEA 4) /Pinkham Way, Haringey**	0 Neutral It is now recommended that the part of this area that could support a waste site in future should be focused towards the northern section which is owned by the NLWA and exclude the southern section owned by LB Barnet. The reduction in the area identified for potential development reduces the potential scale of the impact on the SINC. This has the potential to have a slight positive impact on SA Objectives 2 and 6. The amendments to the 'Planning Information - Relevant Local Plan Policy' section are for clarity and do not impact the sustainability of the plan. The amendments to the 'Constraints – Flood Risk' section bring the text in line with the approach outlined in the October 2019	Section 4.2 (Sites and Areas); Section 4.3 (Area Allocations) and Appendix 5



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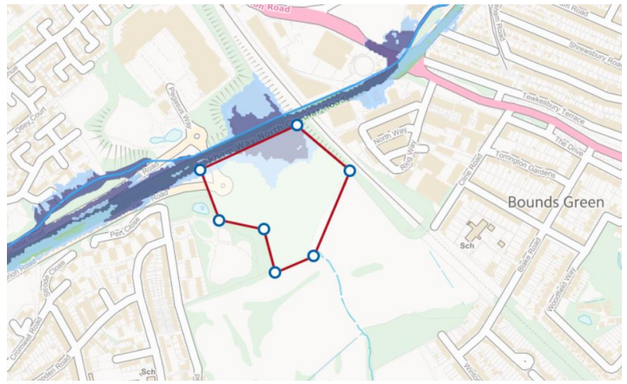
Area Details	
Borough	Haringey
Type of Location	Area
Location Reference	A22-HR – Friern Barnet Sewage Works (LEA 4) /Pinkham Way
Size	5.95 ha
Area Description	Land is currently unused and has become over grown with trees and vegetation.
Description of surrounding uses	Pinkham Way and retail park to north, industrial properties east. Golf course south and a park and residential properties to the west.
Planning Information	

		Planning Designation	The Area is designated a Local Employment Area (LEA) and a Borough SINC.		Flood Risk Sequential Test Report, NPPF and NPPG and clarify that current climate change allowances should be used in planning applications when prepared. These changes have no impact on the sustainability of the plan. The amendments to the 'Conclusion – Potential mitigation measures' section clarify the approach that would need to be taken to deliver a waste management facility on the site, in relation to public consultation, flood risk assessment and overall deliverability analysis. These provide additional background and context but do not change the area profile and, as such, there is no impact on the sustainability of the plan. The additional text in the 'Conclusion – Potential	
		Relevant Local Plan Policy	~~The Area is subject to Local Plan policy SP8: Employment.~~ ~~Friern Barnet site~~ 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 ~~falls within the Borough's Specific Proposal 5, Employment generating uses subject to no adverse effect on the nature conservation value of the site Area.~~ ~~The area is subject to policy SP13: Open Space and Biodiversity.~~ ~~Friern Barnet is allocated as Borough Grade 1 SINC, and for employment uses in the Local Plan.~~			
		Land Use				
		Co-location	This Area would allow for co-location with complementary activities due to its size and highway accessibility.			
		Major New Developments	None identified locally			
		Decentralised Energy Network	The Enfield potential Decentralised Energy area lies approximately 65m northeast of Friern Barnet. Not considered to be a practical option due to distance from potential users. Friern Barnet is in an area of low energy consumption (as ~~site~~ Area undeveloped). Areas northeast, east and west of ~~site~~ Area are high energy consumption zones.			
		Details of in-situ infrastructure	None identified			
		Constraints				
		Flood Risk	~~North boundary and northeast corner of the area is within Flood Zone 2 (medium probability of flooding).~~ ~~Any development on the area will increase impermeable surfaces and therefore increases surface water runoff which would need to be managed. It is understood that historical use of the area may have left contamination. It is unknown whether or not this previous use has an impact on the quality of groundwater. This could be ascertained through any planning~~			

			~~application which may offer the opportunity to provide appropriate remediation.~~ The ~~site~~ Area is largely within Flood Zone 1 with a small area to the north of the ~~site~~ Area falling partially within Flood Zones 2 and 3. 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 would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.  		mitigation measures' section noting the potential benefits of opening (de-culverting) the Muswell Hill Golf Course Brook does not represent a commitment to do so at this stage. The option to de-culvert the brook would form part of a detailed planning application and is not within the scope of the plan. It is therefore not possible to determine the impact of this additional text on the sustainability of the plan. On balance, these amendments will not impact the sustainability of the plan.	

Surface and Groundwater	Not within a Source Protection Zone or ~~principle~~ principal aquifer. Bounds Green Brook lies approximately 40m north of ~~site~~ Area. A pond lies approximately 10m west of ~~site~~ Area and unnamed water course lies approximately 20m south of ~~site~~ Area.
Land Instability	The Environment Agency records historic landfilling in the area. This may represent a ground stability issue and as such further investigation will be required at the planning application stage.
Sensitive Receptors (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Residential properties lie west of Friern Barnet. Given the scale of the area there is scope to create a buffer around any waste management facility and orientate the facility away from residents.
Nature Conservation	Area is within a Borough Site of Importance for Nature Conservation which includes the adjacent Park and Golf Club. A number of ecology surveys have been undertaken and identified habitat of "potential value to a number of protected and notable species". There is an ecological corridor to the east of the area along the railway embankment. Japanese Knotweed and Giant Hogweed have been identified in abundance across ~~site~~ Area. There is currently no active management of the SINC.
Green Belt and Open Space	Land adjacent to the south and west of the area is designated as Metropolitan Open Land.
Historic Environment	No features identified
Highways	The Area would require the creation of an access to the roundabout on Orion Road/Pegasus Way. This would need to be designed to allow HGVs and refuse vehicles. The existing roundabout is suitable for these movements. Access to the North Circular is relatively easy from either Orion Road [heading east] or from Pegasus Way [to head west]. The Colney Hatch Lane/North Circular Road junction suffers from congestion at peak times. Use of the ~~site~~ Area for waste would add to HGV/refuse vehicle movement but is unlikely to have a significant impact on the operation of this junction, based on 60 in/out movements per day for refuse vehicles plus 40 bulk transport in/out movements.
Conclusion	
Potential Uses	~~Integrated resource recovery facilities/resource parks, anaerobic digestion, pyrolysis / gasification, mechanical~~

			~~biological treatment~~ Waste transfer, ~~processing and~~ R~~r~~ecycling, ~~indoor c~~Composting, including indoor in-vessel composting and outdoor composting. ~~Thermal Treatment facilities may be viable but should only be considered if a combined heat and power facility could be incorporated into the facility and linked up to a district heating system.~~ Areas not lying within Flood Zone 3 are potentially suitable to handle hazardous waste.			
		Uses unlikely to be suitable	N/A			
		Potential mitigation measures	The Area covers land owned separately by the North London Waste Authority and the London Borough of Barnet. There are a number of policy, environmental and amenity issues facing this area, although it previously accommodated a sewage treatment works. The Area has revegetated, contains a number of mature trees and is designated as a SINC. Due to the number of designations affecting this Area, only a proportion of the overall area will be suitable for development. Given the land is in two ownerships 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.			

			Any new waste facility in this Priority Area will need to be in line with the Haringey's Local Plan and the London Plan. There are community concerns around the development of a waste facility within this Area and how this will affect the natural environment, flood risk and biodiversity in the Area. Specific policy considerations on this topic are set out below. 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. An appropriate ecological survey will be required to identify significant ecological features to retain or replace. Consideration should be given to the retention and protection of existing mature trees and the designation and management of appropriate areas of habitat to be retained and enhanced. Mitigation measures should include continued habitat connectivity with the adjacent green spaces and ecological corridor along the railway embankment that needs to be retained and enhanced. ~~Incorporating appropriate boundary treatments / landscaping, protecting existing green infrastructure features, undertaking appropriate ecological surveys and creating replacement habitat are likely to be important mitigation measures.~~			

			In line with Local Plan policy DM21: 'Sustainable Design, Layout and Construction', buildings within the development should be designed to complement nature conservation by maximising opportunities to enhance biodiversity, including through appropriate landscaping, Sustainable Drainage Systems, living roofs and green walls. Mitigation measures would be required to protect the amenity of sensitive receptors including hours of working, noise and odour suppression. ~~Consideration should also be given to the creation of an appropriate buffer between waste management facility and nearby sensitive receptors.~~ [Referenced elsewhere] Provision of an acceptable access ~~of~~ from Orion Road Roundabout would be required. Any application should demonstrate how public access to the remainder of the Area could be achieved. 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>Implications for SA</th><th>Reference location in 2019 SA</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> Within the River Lea and Tributaries Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</td></tr>
</table>

<table>
<tr><td>Flood Risk</td><td><s>The north of the area lies with Flood Zone 2 and 3 (medium to highest probability of flooding) with the southern tip lying within Zone 2.
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 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 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.

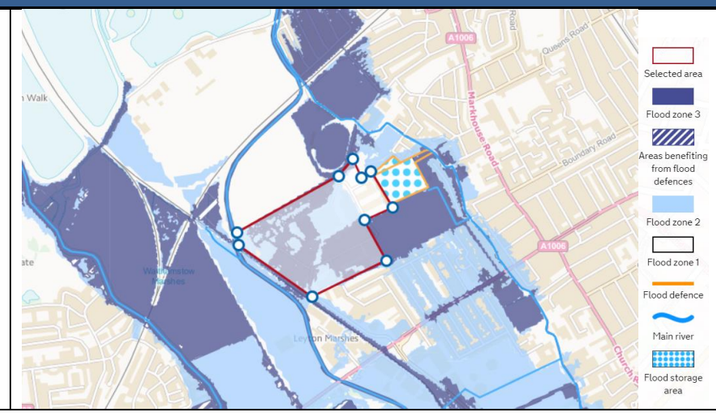
[updated map]</td></tr>
</table>
</td>
<td>Historic environment:

? Uncertain

The potential for buried archaeological assets to be present in this area could result in a negative impact on SA Objective 4. Further archaeological assessment work would be required should proposals for a waste site in this area be considered further.

These amendments also bring the text in line with the approach outlined in the October 2019 Flood Risk Sequential Test Report, NPPF and NPPG and clarify that current climate change allowances should be used in planning applications when prepared. These changes have no impact on the sustainability of the plan.</td>
<td>Section 4.2 (Sites and Areas); Section 4.3 (Area Allocations) and Appendix 5</td>
</tr>
</table>

CAPITA

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
			Flood risk: 0 Neutral Updated flood mapping shows that the proportion of the land in this area that falls within Flood Zones 2 and 3 have remained unchanged. There is therefore no impact on the SA Objectives.	

<table>
<tr><th>Reference</th><th>Section</th><th>Further modification</th><th>Implications for SA</th><th>Reference location in 2019 SA</th></tr>
<tr><td>MM115</td><td>Appendix 2: Waltham Forest LLDC Area Profiles</td><td>LLDC3-WF Temple Mill Lane

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

The site area is largely Flood Zone 2 with a small area of Flood Zone3. 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 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 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]</td></tr></table></td><td>Historic environment:

? Uncertain

The potential for buried archaeological assets to be present in this area could result in a negative impact on SA Objective 4. Further archaeological assessment work would be required should proposals for a waste site in this area be considered further.

These amendments also bring the text in line with the approach outlined in the October 2019 Flood Risk Sequential Test Report, NPPF and NPPG and clarify that current climate change allowances should be used in planning applications when prepared. These changes have no impact on the sustainability of the plan.</td><td>Section 4.2 (Sites and Areas); Section 4.3 (Area Allocations) and Appendix 5</td></tr>
</table>

Reference	Section	Further modification	Implications for SA	Reference location in 2019 SA
			Flood risk: + Minor positive Updated flood mapping shows that the proportion of the land in this area that falls within Flood Zone 3 has decreased considerably although the majority of the area remains within Flood Zone 2. It is now considered that the risk of flooding to the area is lower than previously reported. Therefore, there will be a positive impact on SA Objective 7.	

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Appendix B: Options Appraisal for Sites and Areas- Assessment against the SA Framework

The "Options Appraisal for Sites and Areas to be taken forwards in the Proposed Submission NLWP" (updated July 2020) was produced in response to consultation feedback on the Draft NLWP which was published in 2019. The purpose of the Options Appraisal was to develop a range of reasonable options to aim selection of the most appropriate sites and areas for future waste facilities. The options include and exclude areas based on their performance against qualitative assessment criteria, detailed in the Sites and Areas Report (July 2019). In considering each option, the Boroughs took into account the total land provided and geographical spread.

Section 4 of the Sites and Areas Report (2019) provides a detailed explanation on how the sites and areas assessment methodology was undertaken and the engagement that was conducted regarding the assessment criteria. It also details how the site search and selection process was undertaken. The search criteria were developed using the requirements of National Planning Policy for Waste (NPPW), Planning Policy Guidance (PPG) and the London Plan.

Any sites/areas that were affected by the absolute criteria were excluded from the process and therefore within the context of the SEA Regulations, they did not constitute reasonable alternatives and therefore were not taken forward for assessment within the SA.

Following the initial site and area search and assessment, the long list of identified sites were visited both to provide information for the site selection process and the SA. Using this information, the long list of sites was assessed against the SA Objectives as set out in the Scoping Report (2015). The results of this assessment are within the draft SA submitted alongside the Regulation 18 consultation in 2015. The long list of sites assessed during this process constituted reasonable alternatives at that time.

Following Examination in Public, the Options Appraisal for Sites and Areas has been updated to provide further detail and clarity regarding the process that was used to select the sites and areas that were taken forward from the long list into the Proposed Submission NLWP. As part of this process, the SA objectives were considered alongside each option to ensure compatibility with the SA objectives against the developed options and criteria.

The Options Appraisal for Sites and Areas considers the Base Option and Options 1-5. Each Option considers a different combination of sites and areas, as defined by a specific set of criteria. Option 5 has been selected as the preferred option and is what is incorporated in the NLWP, in particular Policy 2. Option 5 was taken forward into the Proposed Submission NLWP because, unlike the Base Option and Options 2 and 3, it takes forward the best performing areas when considered against the Plan's site selection criteria. Option 5 also provides the greatest geographical spread of waste facilities across the North London boroughs, as all other options would include a significant contribution of areas from Enfield. This contradicts the Plan's spatial principles and provides a balance between North London's waste commitments and the

Boroughs' other planning commitments. The other developed options do not provide this recognition of the current situation in Enfield, nor do they provide that same balance that the NLWP has identified as necessary.

The SA submitted in 2019 assessed each site/area, individually, against the 14 SA Objectives that comprise the SA Framework. The full details of these site-specific appraisals are contained in Appendix 5 of that SA. The site-specific appraisals summary that comprise Option 5 are included in Table 16 within that same 2019 SA.

Table B: Assessment of 'Options Appraisal of Sites and Areas' against the SA Framework

Option	Description	SA Objective														
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	Comment
Base Option	Sites and Areas proposed in the Draft NLWP 2015	-	0	?	0	0	-	-	-	+	-	+	+	+	?	This has not been assessed further as all sites were considered in the NLWP 2015. The options below take into account the various comments received as part this consultation period.
Option 1	'Band B' sites	+	+	0	0	0	0	0	?	0	0	+	+	?	?	Following the consultation, all Sites were updated with more detailed information around transport links, heritage assets, flood risk assessments etc. By choosing sites only within 'Band B', more appropriate locations for waste have been chosen, and the better performing sites from an SA point of view are now being considered within this option.
Option 2	Band B areas and larger Band C areas	+	?	-	0	?	0	?	?	?	?	?	?	+	?	In this option, larger Band C areas are included. These have been identified as requiring "significant mitigation" to be suitable for waste uses. Larger sites may be preferred to site away from other community uses, but it is unclear what significant mitigation (such as transport improvements) may be needed to make them suitable, hence the scoring against SA objectives. Larger sites

															could encourage a greater range of facilities/waste technologies to be established within the NLWP area but the uncertainty of what is needed to improve Band C sites would need to be tested further.
Option 3	Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS)	++	+	?	0	+	0	0	?	0	?	+	+	+	?	By siting waste areas in industrial locations, the adverse effects from waste sites are minimised on communities, adequate transport links are already established and considers continued economic growth of the waste industry in locations suitable to operators. However, Enfield does contribute a significant proportion of the sites within this option.
Option 4	Band B, SIL and LSIS areas	+	0	?	0	?	0	0	?	0	?	+	+	+	?	This option considers the best of Band B areas and then the existing industrial locations within option 3. More certainty around the SA objectives could be given by providing a list of those Band B areas deemed to be the "best". Including SIL/LSIS is a positive step for ensuring sites are sited appropriately, though Enfield again contains most of these sites.
Option 5	Band B, SIL and LSIS areas with a cap on land in Enfield	+	0	?	0	?	0	0	?	0	?	+	+	+	?	This option considers the work established by options 1-4 and then ensures that Enfield will see a much smaller return on new sites and provide better geographical spread throughout the plan area. The option focusses on sites requiring some mitigation and those already identified as industrial, thus giving rise to positive/neutral effects on SA objectives.

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Appendix C: Updated Capacity Strategy Options- Assessment against the SA Framework

The Proposed Submission SA Report (2019) considered the following 4 capacity strategy options for managing North London's waste (see Section 4.2, Table 10 and Appendix 1), based on the Options Appraisal Report (2018):

1. Meeting the London Plan apportionment (managing approximately 85% of LACW and C&I waste generated in North London)
2. Net self-sufficiency[3] for LACW and C&I waste streams (managing the equivalent of 100% of LACW and C&I waste generated in North London)
3. Net self-sufficiency for LACW, C&I and CD&E waste streams (managing the equivalent of 100% of LACW, C&I and C&D waste generated in North London)
4. Complete self-sufficiency (managing every tonne of locally created waste within North London)

The Options Appraisal Report (2019) considered 5 options, of which Option 5 was selected to form the basis for modelling North London's waste arisings over the plan period. Option 5 was selected as the preferred option as it is compliant with national legislation on managing all main waste streams, which is not the case for Options 1, 2 or 4. It is also the option that would provide the greatest contribution to net self-sufficiency, as it is the only option that would manage the equivalent to 100% of North London's waste arisings for all the main waste streams, thus reducing the need to export waste outside of North London. The assessment of these 5 capacity strategy options, as originally contained in Appendix 1 of the Proposed Submission SA Report (2019), has been updated to reflect the changes and is contained in Table C.

Table C: Updated capacity strategy options appraisal against the SA Framework

Policy text:	**Capacity options: How much of North London's waste can be managed within North London** Option 1: Meeting the London Plan apportionment (the equivalent of 75% of LACW and C&I waste generated in North London) Option 2: Meeting the London Plan apportionment and net self-sufficiency for C&D waste (the equivalent of 75% of LACW and C&I waste and 100% of C&D waste generated in North London) Option 3: Meeting the London Plan apportionment, net self-sufficiency for C&D and hazardous waste (the equivalent of 75% of LACW and C&I waste and 100% of C&D and hazardous waste generated in North London) Option 4: Meeting the North London's arisings and net self-sufficiency for C&D waste (the equivalent of 100% of LACW, C&I and C&D waste generated in North London) Option 5: Meeting the North London's arisings, net self-sufficiency for C&D and hazardous waste (the equivalent of 100% of LACW, C&I, C&D and hazardous waste generated in North London)

Assessment framework		***Permanence***			***Characteristics of impacts***		***Additional impacts***	**Nature / scope of mitigation**	**Score**
SA Objective	**Evaluation criteria**	**Duration**			**Certainty**	**Scale of impact(s)**	**Secondary, Cumulative, Synergistic**		
		0-5 yrs	5-10 yrs	>10 yrs		Characterise the scale / severity for each impact as necessary			
1. To protect people's health, communities and local environmental quality from the adverse effects of waste management	Option 1			X	Low	Given the nature of the urban area in North London, each of the options is likely to result in waste management development taking place in close proximity to sensitive receptors and will therefore have the potential to have negative impact on the objective. Nevertheless, as Options 2, 3, 4 and 5 would require more facilities to be provided, there is a greater likelihood that these options would have a negative impact on the objective in the Plan area. Conversely, Option 1 would result in more waste being managed outside of North London and, as a result, any adverse impacts would affect a wider area (or more locations).	Secondary impacts on quality of life and perceptions of the area.	Enforce appropriate controls through planning conditions and environmental permitting. Ensure that only enclosed facilities are developed close to sensitive receptors.	–
	Option 2			X	Medium				–
	Option 3			X	Medium				–
	Option 4			X	Medium				–
	Option 5			X	Medium				–

[3] Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste generated in North London, whilst recognising that some imports and exports will continue.

Assessment framework		*Permanence*			*Characteristics of impacts*		*Additional impacts*	Nature / scope of mitigation	Score
SA Objective	Evaluation criteria	Duration			Certainty	Scale of impact(s)	Secondary, Cumulative, Synergistic		
		0-5 yrs	5-10 yrs	>10 yrs		Characterise the scale / severity for each impact as necessary			
2. To maintain green infrastructure and open space	Option 1			X	Low	Although each option would support the development of waste management facilities, it is uncertain whether the development of these facilities under any option would result in the loss of green infrastructure or open space. As a result, the impact of each of the options on the objective is considered to be uncertain.			?
	Option 2			X	Low				?
	Option 3			X	Low				?
	Option 4			X	Low				?
	Option 5			X	Low				?
3. To promote sustainable modes of transport, reduce the need to travel and improve choice of more sustainable transport modes	Option 1			X	Low	By providing enough waste management capacity to manage at least the equivalent of the waste generated in North London, Options 4 and 5 would help to maximise self-sufficiency in the management of waste and would therefore reduce the need for waste to be transported out of the Plan area. Options 2 and 3 would make a contribution to the objective of maximising self-sufficiency in the management of waste, but to a lower extent than Options 4 and 5. As North London does not presently meet its apportionment, Option 1 could also result in some reduction in the need for waste to be transported out of the Plan area. There is however a lower level of certainty that the impact of Option 1 on the objective would be significant.	Secondary impact on greenhouse gas emissions from the transport sector and air quality.		+
	Option 2			X	Medium				+
	Option 3			X	Medium				+
	Option 4			X	Medium				+ +
	Option 5			X	High				++
4. To conserve and enhance the historic environment, heritage assets and their settings	Option 1			X	Low	Although each option would support the development of waste management facilities, it is uncertain whether the development of these facilities under any option would take place in areas where it would have an impact on the setting of heritage assets. As a result, the impact of each of the options on the objective is considered to be uncertain.			?
	Option 2			X	Low				?
	Option 3			X	Low				?
	Option 4			X	Low				?
	Option 5			X	Low				?
5. To maintain and enhance the quality and character of North London's townscapes and landscapes	Option 1			X	Low	Although each option would support the development of waste management facilities, it is uncertain whether the development of these facilities under any option would take place in areas where it would have an impact on the character and quality of the townscape and landscape. As a result, the impact of each of the options on the objective is considered to be uncertain.			?
	Option 2			X	Low				?
	Option 3			X	Low				?
	Option 4			X	Low				?
	Option 5			X	Low				?
6. To maintain, protect and enhance biodiversity, protected species,	Option 1			X	Low	Although each option would support the development of waste management facilities, it is uncertain whether the any option would result in development taking place in locations where it would have a significant detrimental impact on biodiversity. As a result, the impact of each of the options on the objective is considered to be uncertain.			?
	Option 2			X	Low				?
	Option 3			X	Low				?

Assessment framework		*Permanence*			*Characteristics of impacts*		*Additional impacts*	Nature / scope of mitigation	Score
SA Objective	Evaluation criteria	Duration			Certainty	Scale of impact(s)	Secondary, Cumulative, Synergistic		
		0-5 yrs	5-10 yrs	>10 yrs		Characterise the scale / severity for each impact as necessary			
habitats, geodiversity and features of geological interest	Option 4			X	Low				?
	Option 5			X	Low				?
7. To reduce and manage flood risk	Option 1			X	Low	Although each option would support the development of waste management facilities, it is not certain that any of these facilities would result in development taking place in areas at risk of flooding. As a result, the impact of each of the options on the objective is considered to be uncertain.			?
	Option 2			X	Low				?
	Option 3			X	Low				?
	Option 4			X	Low				?
	Option 5			X	Low				?

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Assessment framework		*Permanence*			*Characteristics of impacts*		*Additional impacts*	Nature / scope of mitigation	Score
SA Objective	Evaluation criteria	Duration			Certainty	Scale of impact(s)	Secondary, Cumulative, Synergistic		
		0-5 yrs	5-10 yrs	>10 yrs		Characterise the scale / severity for each impact as necessary			
8. To adapt to, and reduce the impacts of climate change	Option 1			X	Low	Although each option would support the development of waste management facilities, it is not certain that any of these facilities would result in development taking place in areas at risk of flooding or which results in the loss of green infrastructure features which could help reduce the impacts of climate change. As a result, the impact of each of the options on the objective is considered to be uncertain.			?
	Option 2			X	Low				?
	Option 3			X	Low				?
	Option 4			X	Low				?
	Option 5			X	Low				?
9. To reduce climate change contributions, promote energy efficiency and increase use of energy from sustainable sources	Option 1			X	Low	By providing enough waste management capacity to manage at least the equivalent of the waste generated in North London, Options 4 and 5 would help to maximise self-sufficiency in the management of waste and would therefore reduce waste miles and associated greenhouse gas emissions. Options 2 and 3 would make a contribution to the objective of maximising self-sufficiency in the management of waste, but to a lower extent than Options 4 and 5. As North London does not presently meet its apportionment, Option 1 could also result in some reduction in the need for waste to be transported out of the Plan area with an associated decrease in greenhouse gas emissions from the transportation of waste. There is however a lower level of certainty that the impact of Option 1 on the objective would be significant.			+
	Option 2			X	Medium				+
	Option 3			X	Medium				+
	Option 4			X	Medium				+ +
	Option 5			X	High				++
10. To protect and improve air, water and soil quality	Option 1			X	Low	The options which result in a higher level of self-sufficiency would reduce emissions associated with the transportation of waste. Although individual waste management facilities could have localised impacts on air quality, such as dust, this could be mitigated. As such, Options 4 and 5 have the potential to have a positive impact on the objective. The options which do not result in self-sufficiency are less likely to result in a significant reduction of emissions associated with the transportation of waste. As such, it is uncertain whether Options 1, 2 and 3 would have a significant impact on the objective.	Secondary impacts on health.	Dust suppression and other measures such as wheel-washing.	?
	Option 2			X	Low				?
	Option 3			X	Low				?
	Option 4			X	Medium				+
	Option 5			X	Medium				+

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Assessment framework		*Permanence*			*Characteristics of impacts*		*Additional impacts*		
SA Objective	**Evaluation criteria**	**Duration**			**Certainty**	**Scale of impact(s)**	**Secondary, Cumulative, Synergistic**	**Nature / scope of mitigation**	**Score**
		0-5 yrs	5-10 yrs	>10 yrs		Characterise the scale / severity for each impact as necessary			
11. To manage waste sustainability, maximise self-sufficiency in the management of waste, minimise production of waste and increase re-use, recycling and recovery rates	Option 1			X	Low	By providing enough waste management capacity to manage at least the equivalent of the waste generated in North London, Options 4 and 5 would help to maximise self-sufficiency in the management of waste and would therefore have a major positive impact on the objective. Options 2 and 3 would make a contribution to the objective of maximising self-sufficiency in the management of waste, but to a lower extent than Options 4 and 5. Option 1 could still support the sustainable management of certain waste streams in North London but there is a lower level of certainty that it would have a significant impact on the objective.	Secondary impact on greenhouse gas emissions from the transport sector and air quality.		+
	Option 2			X	Medium				+
	Option 3			X	Medium				+
	Option 4			X	Medium				+ +
	Option 5			X	High				++
12. To ensure efficient use of land and natural resources and the sustainable use of existing resources	Option 1			X	Medium	The options differ in where material would be recycled and not the level of recycling achieved. Each option would support the provision of waste management facilities that can support recycling and recovery and therefore help ensure the efficient use of natural resources.			+
	Option 2			X	Medium				+
	Option 3			X	Medium				+
	Option 4			X	Medium				+
	Option 5			X	Medium				+
13. To encourage sustainable economic growth, exploit the growth potential of business sectors and improve productivity and competitiveness of local waste industry	Option 1			X	Low	Each of the options would support the provision of waste management facilities which would support economic growth and could help improve the productivity and competitiveness of the local waste industry. As a result, each option has the potential to have a positive impact on the objective. There is however a greater level of certainty that Options 4 and 5 would have a positive impact on this objective given that they would result in the provision of a greater number of waste management facilities in the plan area.			+
	Option 2			X	Low				+
	Option 3			X	Low				+
	Option 4			X	Medium				+
	Option 5			X	Medium				+
14. To reduce economic disparities, unemployment and deprivation	Option 1			X	Low	Each of the options would support the provision of waste management facilities which would generate employment opportunities. As a result, each option has the potential to have a positive impact on the objective of reducing unemployment and deprivation. There is however a greater level of certainty that Options 4 and 5 would have a positive impact on this objective given that they would result in the provision of a greater number of waste management facilities in the plan area.			+
	Option 2			X	Low				+
	Option 3			X	Low				+
	Option 4			X	Medium				+
	Option 5			X	Medium				+

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Summary of Assessment
Although each of the capacity strategy options has the potential to have a positive impact on a number of sustainability objectives, there are a number of instances where Options 4 and 5 could have a more significant positive impact on the objectives. In particular, by providing enough waste management capacity to manage at least the equivalent of the waste generated in North London, Options 4 and 5 have the potential to have a more significant positive impact on the objectives that relate to maximising net self-sufficiency in the management of waste, reducing contributions to climate change and reducing the need to travel. Options 4 and 5 could also have a positive impact on the objective of protecting and improving air, water and soil quality. All five of the options would however have a positive impact on the objectives that relate to ensuring the efficient use of natural resources, encouraging sustainable economic growth and reducing unemployment. Each option could however have some negative impact on the objective that relates to amenity. Key mitigation measures are likely to include enforcing appropriate controls through planning conditions and environmental permitting and ensuring that only enclosed facilities are developed close to sensitive receptors. Each option would have an uncertain impact on the remaining objectives.

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