North London Waste Plan
Consultation Report
Main Modifications consultation October–December 2020

March 2021

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1. Introduction

1.1 Seven London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest ('The North London Boroughs') are working together as planning authorities to prepare the North London Waste Plan (NLWP).

1.2 The NLWP will set out the planning framework for waste management in the North London Boroughs for the next 15 years. It will identify sites and areas suitable for waste facilities and set out policies for determining waste planning applications.

1.3 Under Regulation 22 of The Town and Country Planning (Local Planning) (England) Regulations the Proposed Submission NLWP was submitted to the Secretary of State for Housing, Communities and Local Government on 8th August 2019. Public hearings took place in November 2019.

1.4 In response to the issues raised in the hearing sessions and pre-hearing consultation responses, the North London Boroughs prepared a Schedule of Proposed Modifications to the NLWP. The Schedule included 'Main Modifications' which relate to issues of soundness and 'Additional Modifications' of a minor nature.

1.5 The Proposed Modifications were published for consultation during October-December 2020 along with a Sustainability Appraisal Addendum, Habitat Regulations Assessment and other supporting documents.

1.6 Consultation on the NLWP was undertaken in line with section 6 of the Procedure Guide for Local Plan Examinations and in accordance with the NLWP Consultation Protocol 2014 and borough Statements of Community Involvement (SCI).

1.7 The consultation sought views on the proposed Main Modifications only, and representations were limited in scope to issues of soundness or legal compliance only.

1.8 This Consultation Report provides details about the Proposed Modifications have been taken into account in the Proposed Submission Plan.

2. Previous Consultations

2.1 In April-June 2013, the North London Boroughs invited representations about what the NLWP ought to contain. A Report of the NLWP Launch Consultation is available online.

2.2 A full Consultation Statement on the 'launch consultation' was made available during the Draft Plan consultation and is available on the NLWP website. This sets out a complete list of consultees who were invited to make representations, launch letter, the list of representors, a summary of the main issues and how representations have been taken into account.

2.3 After the launch consultation, a series of three Focus Group events were held on 25th March, 3rd June and 1st July 2014. A record of the sessions is available in the Report on Focus Group Events.

2.4 The Draft Plan consultation took place over a nine week period during July-September 2015. The Draft Plan provided the first opportunity for stakeholders to make comments on the strategy for future waste management in North London, potential locations for new facilities across the area, and policies.

2.5 The Boroughs consulted on the Proposed Submission North London Waste Plan (NLWP) March-April 2019. The Proposed Submission North London Waste Plan took account of comments made on the Draft Plan as well as an updated Data Study and changes to national, regional and local policies.

3. Summary of Proposed Modifications

The proposed modifications which were consulted on during October-December 2020 are the amalgamation of modifications generated at two phases of work:

i) Pre-hearings

The pre-hearings modifications were presented to the Inspector in advance of the hearings. The modifications responded to the representations received at the Regulation 19 consultation. Broadly the proposed modifications fall into three categories

- Factual updates: including suggestions from GLA, NLWA, Thames Water and Historic England
- Revised targets in the new London Plan. New targets emerged after the Regulation 19 NLWP was finalised. A lot of the proposed modifications are related to the target in the new London Plan of 95% beneficial use for Excavation Waste and a separate modified target of 95% reuse/recycling/recovery for Construction and Demolition waste
- Modifications to NLWP policy: minor changes to policies are put forward in response to representations.

ii) Post-hearings

The post-hearings modifications were drawn up in response to issues raised by the Inspector and by representors. These modifications can be summarised as follows:

- Structural changes to the NLWP to help the narrative flow better and to aid clarity
- More robust link between the Strategic Objectives, the Spatial Principles and the identification of land for new waste facilities
- Revised data tables in chapters 5-6 to provide a clearer explanation of how the capacity gap is derived from waste data and how this is translated into land requirements
- More robust link with climate change issues throughout plan
- Clarity on nature of net self-sufficiency aim
- How and where compensatory provision of a redeveloped facility can be achieved

- Setting out the policy context of environmental protections for Pinkham Way
- Improved legibility of maps/diagrams
- The scope of annual joint monitoring of the plan

4. Consultation

4.1 The NLWP Main Modification consultation took place from 29th October to 10th December 2020. The consultation was held during the coronavirus pandemic and the boroughs sought to mitigate the impact of this where possible, for example providing hard copy documents on request.

4.2 Notification emails were sent to everyone on the NLWP database and borough Local Plan databases (see Appendix A). Guidance on making representations on the Main Modifications was provided with the Representation Form (see Appendix B). All the consultation documents were made available on the NLWP website.

4.3 In response to the coronavirus pandemic, the government temporarily relieved local authorities of the obligation to provide hard copies of local plan documents for inspection. However, paper copies of the documents were available in some of the main planning offices and libraries of the boroughs and details of these locations were provided.

5. List of Representors

5.1 A total of 24 **representations** were received from individuals (4), community / environmental groups (6), industry/business (5), political groups (1) and statutory consultees (8).

5.2 The following bodies and persons made representations at the Draft Plan consultation:

Individuals (4)
Representations from local residents

Community / Environmental Groups (6)
Dump Donoghue
Extinction Rebellion Zero Waste
Freehold Community Association
Pinkham Way Alliance (PWA)
Stop The Edmonton Incinerator Now
Swift Conservation

Waste industry / Business (5)
Fitzgerald & Burke Builders Merchants
GBN
Henry Boot Developments
North London Waste Authority (NLWA)
PALOMA II (INDUSTRIAL IV) TRUSTEE I LIMITED

Political (1)
Barnet Labour Group

Statutory Consultees (8)
Environment Agency
MMO
Natural England
Network Rail
Port of London Authority
TfL Commercial Development
TfL Spatial Planning
Thames Water

6. Representations: Summary of the main comments

6.1 The table below summarises the main issues raised by each representor. Full representations can be found on the NLWP website.

6.2 It should be noted that not all representors limited their comments to issues of soundness or legal compliance of the Main Modifications. Many comments fell outside the scope of the consultation. However, where possible. the Boroughs have provided a response to all representors (see Appendix C).

Representations on the NLWP Main Modifications: Summary of main comments

Representor	Summary of main comments
Barnet Labour Group	Objection to Oakleigh Road, Brunswick Industrial Park, Mill Hill Industrial Estate and Connaught Business Centre being included in the NLWP.
Stella D'Alberti	Possible objection to the new Edmonton EfW.
Dump Donoghue	Additional explanation needed on the enforcement of existing sites and adverse impacts.
Environment Agency	Suggested wording changes related to flood risk in the Area Profiles for clarity.
Extinction Rebellion Zero Waste	Objection to the proposed new Edmonton EfW.
Fitzgerald & Burke Builders Merchants	Concerned that the NLWP has allocated Fitzgerald & Burke Builders Merchants for waste uses.
Freehold Community Association	Objection to the inclusion of Pinkham Way.
GBN	Supports the deletion of WAF4 which has been transferred to Gibbs Road (ENF 37).
Henry Boot Developments	Clarification sought on the sequential approach to site search in Policy 2 applies to waste facilities in Enfield wanting to relocated within Enfield.
Marine Management Organisation	Recommends mentioning the draft South East Marine Plan in section 1.5.

Cathy Mears	Objection to the proposed new Edmonton EfW.
Natural England	No comments
Network Rail	No comments
NLWA	• The developable area in Pinkham way should not exclude land that is subject to flood risk or land in the ownership of Barnet from the developable area. • Para 8.20 should refer to locations other than industrial land, such as employment areas, which are suitable for waste uses.
PALOMA II (INDUSTRIAL IV) TRUSTEE I LIMITED	• HAR7 should be renamed 'Redcorn Ltd, Brantwood Road'. • Supports the revision of HAR7 site boundary in Haringey's Policies Map. The site profile for HAR7 should also be updated.
Pinkham Way Alliance	• Objection to the inclusion of Pinkham Way • Detailed objections on all aspects of the plan
Port of London Authority	No comments
Seamus Reddin	Connaught Business Centre should not be included in the NLWP.
Stop The Edmonton Incinerator Now	Objection to the proposed new Edmonton EfW.
Swift Conservation	NLWP should require artificial nesting and roosting habitats as part of new development
TfL Commercial Development	Object to the inclusion of Temple Mills Lane Bus Depot site.
TfL Spatial Planning	• Concerns remain about Brunswick Industrial Park due to restricted access to the SRN and Temple Mills Lane due to the safeguarded bus depot. • There should be an explicit commitment to the specific requirements of TfL's Vision Zero Action Plan as requested.
Thames Water	Support for modifications which are in line with previous representations.
Mr Welby	Mill Hill Industrial Estate no longer exists.

7. Proposed Modifications arising from MM Consultation

7.1 Borough responses to the representations on the Main Modifications can be found at Appendix C of this report. Some of the representations received resulted in further modifications to the NLWP. The majority of these are minor in nature and seek to add clarity or correct an error.

7.2 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.

7.3 A limited number of comments were also submitted on the Additional Modifications which the Boroughs have taken into account, but no further changes to the AMs were considered necessary.

8. Next Steps

8.1 Representations on the Main Modifications, the Borough responses, and an updated Schedule of Proposed Modifications to the NLWP have been passed to the Inspector by the Boroughs for him to consider in the final stages of the examination and to inform the recommendations in his final report. The Sustainability Appraisal has also been updated in light of the further modifications made as a result of the Main Modification consultation.

8.2 Further hearing sessions will not usually be held, unless the Inspector considers them essential to deal with substantial issues raised in the representations, or to ensure fairness. If the Inspector does not consider further hearing sessions necessary, the next stage will be the publication of the Inspector's Report.

8.3 The Inspector will write his report on the soundness of the plan. When that is received, and providing the NLWP is found sound, the boroughs can move towards adoption of the plan through cabinet and full council.

8.4 The NLWP website will be kept up to date and participants will be notified by email of any significant stages in the NLWP Examination process.

Appendix A: Main Modifications Notification Email

Consultation on Main Modifications to the Proposed Submission North London Waste Plan 29th October to 10th December 2020

I am writing to invite representations on the Main Modifications to the proposed submission North London Waste Plan (NLWP).

The North London Waste Plan (NLWP) is being examined by an independent Planning Inspector (Mr Stephen Normington) whose role is to assess whether the plan complies with the legal requirements and is sound.

In response to the issues raised in the hearing sessions held in November 2019, the North London Boroughs have prepared a Schedule of Proposed Modifications to the NLWP. This document has been published for consultation along with a Sustainability Appraisal Addendum, Habitat Regulations Assessment and other supporting documents. All of the documents can be found on the NLWP website.

The Inspector considers that the format of the Schedule of Proposed Modifications is suitable for public consultation purposes, however the modifications are put forward without prejudice to the Inspector's final conclusions.

The consultation runs from 29th October to 10th December 2020. Representations received after 10th December 2020 cannot be accepted.

The consultation is seeking views on the proposed Main Modifications. It is not an opportunity to raise matters that either were, or could have been, part of the earlier representations or hearings on the submitted plan. Comments should focus on whether the Main Modifications comply with the legal requirements and are considered sound.

Further guidance on making representations on the Main Modifications can be found in the Representation Form and Guidance Notes document.

Due to Covid-19 restrictions, paper copies of the documents are only available in some of the main planning offices and libraries of the boroughs. Details are given in the Representation Form and Guidance Notes. Our strong preference is for consultees to make use of the online version of documents if possible, however if you require hard copies of documents please request these by emailing feedback@nlwp.net.

Please submit representations electronically using one of these methods:

- Downloading a representation form from the website and sending the completed form to feedback@nlwp.net
- Sending your representation in an email to feedback@nlwp.net

Alternatively, you can post your representation to North London Waste Plan, Planning and Regeneration, Camden Town Hall, Judd Street WC1H 9JE.

For more information about the consultation on the North London Waste Plan, please visit the website http://www.nlwp.net . If you cannot find the information there, email feedback@nlwp.net or phone 020 7974 3307.

Victoria Manning
Programme Manager
North London Waste Plan

Appendix B: Representation Form and Guidance Notes

Public Consultation on Main Modifications
to the Proposed Submission North London Waste Plan (NLWP)

Representation Form and Guidance Notes

Please save and return to feedback@nlwp.net **by the end of Thursday 10th December 2020.**

This form has two parts:
Part A – Personal details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Guidance notes are available at the end of the Representation Form. Please read the advice in the guidance notes on making a representation attached to the consultation before completing this response form.

Please note that any comments you make will be made publically available and attributed to your name. Please see the Privacy Policy for details of how we use your information. We are required to share your information with the Planning Inspector for the purposes of the Examination.

Part A: Personal Details:

Name:

Job Title:
(where applicable)

Organisation:
(where applicable)

Agent representing:
(where applicable)

Address:

Telephone:

Email:

Part B – Your representations

Please use a separate sheet for each representation

1. To which Main Modification does this representation relate?

(one modification reference per form)

Main Modification reference:
Paragraph number:

2. Do you consider the proposed Main Modification to be:

Legally compliant (Y/N):
Sound (Y/N):

3. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your comments relate to:

Positively prepared
Justified
Effective
Consistent with national policy

4. Please give details of why you consider the proposed Main Modification is not legally compliant or is unsound. Please be as precise as possible.

5. Please set out what change(s) you consider necessary to make the proposed Main Modifications legally compliant or sound, having regard to the test you have identified in Q3 above where this relates to soundness. You will need to say why this change will make the proposed Main Modification to the Proposed Submission NLWP legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

6. Do you require notification of any of the following to your email address stated in Part A:

The publication of the inspector's recommendations following the independent examination (Y/N):

The adoption of the Local Plan (Y/N):

Representation Guidance Notes

Introduction

The North London Waste Plan (NLWP) is being examined by an independent Planning Inspector, Mr Stephen Normington, whose role is to assess whether the plan complies with the legal requirements and is sound.

In response to the issues raised in the hearing sessions held in November 2019 and pre-hearing consultation responses, the North London Boroughs have prepared a Schedule of Proposed Modifications to the NLWP. This document has been published for consultation along with a Sustainability Appraisal Addendum, Habitat Regulations Assessment and other supporting documents. All of the documents can be found on the NLWP website.

The consultation is seeking views on the proposed Main Modifications only, however for completeness the North London Boroughs have published both the Main Modifications and Additional Modifications of a minor nature together. The Inspector considers that the format of the Schedule of Proposed Modifications is suitable for public consultation purposes, however the Main Modifications are put forward without prejudice to the Inspectors' final conclusions.

Representations on Main Modifications are limited in scope to issues of soundness or legal compliance only. Any comments on Additional Modifications will be considered by officers and for completeness will also be given to the Inspector separately from the representations on Main Modifications.

Representations on the Main Modifications will be given to the Inspector by the Boroughs for him to consider in the final stages of the examination and to inform the recommendations in his final report. Further hearing sessions will not usually be held,
unless the Inspector considers them essential to deal with substantial issues raised in the representations, or to ensure fairness.

The Consultation

The consultation runs from **29th October to 10th December 2020**. Representations received after 10th December 2020 cannot be accepted.

The consultation is seeking views on the proposed Main Modifications. It is not an opportunity to raise matters that either were, or could have been, part of the earlier representations or hearings on the submitted plan. It is not necessary to repeat comments already made on other aspects of the plan as these are already being considered by the Inspector.

If you wish to make a representation(s) seeking a change to a proposed Main Modification of the Proposed Submission NLWP, you should make clear in what way the Main Modification does not make the NLWP sound having regard to the legal compliance and the four tests of soundness set out below. You should try to support your representation by evidence showing why the proposed Main Modification should be changed. It will be helpful if you say precisely how you think the Main Modification should be changed.

Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change. The representations

received on Main Modifications will assist the Inspector in making recommendations to the Boroughs to enable adoption of the NLWP.

Legal compliance

To be 'legally compliant' a local plan has to be prepared in accordance with the Duty to Cooperate and legal and procedural requirements. This is required by legislation and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) taking into account the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020.

Test of Soundness

To be 'sound' a local plan should be positively prepared, justified, effective and consistent with national policy. This is explained in the National Planning Policy Framework 2019 (paragraph 35):

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework

Viewing the documents

In response to the coronavirus pandemic, the government have has temporarily relieved local authorities of the obligation to provide hard copies of local plan documents for inspection[1]. However, paper copies of the documents are only available in some of the main planning offices and libraries of the boroughs. Details are provided below.

Borough	Hard copy documents can be inspected in libraries	Hard copy documents available free of charge
Barnet	No	Yes
Camden	No	Yes
Enfield	**Edmonton Green Library**, 36-44 South Mall, Edmonton N9 0TN **Enfield Town Library**, 66 Church Street, Enfield EN2 6AX **Ordnance Unity Centre Library**, 645 Hertford Road, Enfield EN3 6ND **Palmers Green Library**, Broomfield Lane, Palmers Green N13 4EY	Yes

[1] The Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020

Borough	Hard copy documents can be inspected in libraries	Hard copy documents available free of charge
Hackney	No	Yes
Haringey	**Wood Green Library**, 187-197A High Road, Wood Green, London N22 6XD **Muswell Hill Library**, Queens Avenue, Muswell Hill, N10 3PE **St Ann's Library**, Cissbury Road, Tottenham, London, N15 5PU **Stroud Green and Harringay Library**, Quernmore Road, London, N4 4QR **Alexandra Park Library**, Alexandra Park Rd, London, N22 7UJ **Highgate Library**, 1 Shepherds Hill, Highgate, London N6 5QJ **Marcus Garvey Library**, Tottenham Green Pools and Fitness, 1 Philip Lane, Tottenham, N15 4JA **London Borough of Haringey**, Planning Policy, River Park House, 225 High Road, Wood Green, N22 8HQ	Yes
Islington	No	Yes
Waltham Forest	**Hale End library**, Castle Avenue, Highams Park E4 9QD **Wood Street library**, 1 Troubridge Square, Wood Street, E17 3HB **Walthamstow library**, High Street, Walthamstow E17 7JN **Leyton library**, High Road, Leyton E10 5QH **Leytonstone library**, 6 Church Lane, Leytonstone E11 1HG **Lea Bridge library**, Lea Bridge Road, Leyton E10 7HU **Chingford library**, The Green, Chingford E4 7EN **Higham Hill library**, North Countess Road, Walthamstow E17 5HS	Yes

Our strong preference is for consultees to make use of the online version of documents if possible, however if you are having problems accessing documents online you can request hard copies by emailing feedback@nlwp.net or phoning 020 7974 3307.

Submitting your representations

Please submit representations electronically using one of these methods:

- Completing the representation form and returning it to feedback@nlwp.net
- Sending your representation in an email to feedback@nlwp.net

Alternatively, you can post your representation to North London Waste Plan, Planning and Regeneration, Camden Town Hall, Judd Street WC1H 9JE.

The consultation runs from 29th October to 10th December 2020. Representations received after 10th December 2020 cannot be accepted.

For more information about the North London Waste Plan, please visit the website. If you cannot find the information there, email feedback@nlwp.net or phone 020 7974 3307.

Appendix C: Borough Responses to Main Modifications Consultation Representations and Proposed Changes

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
MM1	1.3	Pinkham Way Alliance	The proposed MM does provide clarity about the purpose of the Spatial Principles, however there is no evidence to support the claim that, "The spatial principles flow from the Strategic Objectives". In reality the spatial principles are a set of objectives in their own right simply with the exclusion of the initial construct, "To ... As raised earlier in the NLWP process, there is no "flow", evidenced or logically, from any of the Strategic Objective's (SO's) to SP B, "better geographic spread".	No response. This wording is not new and has been moved here from 4.1. This repeats matters which have been raised previously and are already being considered by the Inspector. No change proposed.
MM1	1.3	Pinkham Way Alliance	The absence of a thread linking the levels of the NLWP into one coherent hierarchical skeleton was examined at the EIP. We suggest an addition reflecting the importance of the SO's: The spatial principles ~~flow from the Strategic Objectives and, along~~ **with the Strategic Objectives,** provide the ~~strategic~~ direction for the ~~detailed~~ policies of the NLWP and inform site/area selection.	No response. The Boroughs do not consider the proposed changes add clarity. This is a matter that could have been part of the earlier representations or hearings on the submitted plan. No change proposed.
MM1	1.3	Pinkham Way Alliance	We suggest the referencing of the aim and the (strategic?) objectives in the preceding paragraph of the NLWP as (overarching) principles adds to confusion / lack of clarity.	It is not clear what is being proposed. It is not accepted that there is any lack of clarity. No change proposed.
MM1	1.3	Pinkham Way	The reference is to objectives in one paragraph	**PROPOSED CHANGE**:

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
		Alliance	and strategic objectives in the following. It should be made clear that these are one and the same, if that is the intent.	**The Aim and Strategic Objectives:**
MM2	3.3	Pinkham Way Alliance	The aim "To achieve net self-sufficiency for LACW, C&I and C&D waste streams, including hazardous waste," should be amended to remove conflicts with the approach taken elsewhere in the NLWP; or alternatively those conflicts should be corrected to ensure consistency of the aim with the actions of the plan. We highlight that: • Net self-sufficiency for LACW, C&I and C&D waste streams, including hazardous waste is not equivalent to • Net self-sufficiency for LACW, C&I, C&D and hazardous waste streams. despite the NLWP using them, and occasionally other derivatives, interchangeably. We are unable to suggest changes because the chosen path of the boroughs is uncertain, specifically: By not listing hazardous waste as a waste stream in its own right, along with LACW, C&I and C&D, the implication is that NSS will be considered with the hazardous elements of these individual streams being considered within its respective master stream, eg hazardous C&I within overall C&I. This approach is supported by NLWP 1.4 where hazardous waste is defined as, "A sub category of	No response. It is not accepted that there is any material inconsistency and this is a matter that could have been part of the earlier representations or hearings on the submitted plan. No change proposed.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			all waste streams where the material produced is hazardous and requires specialist treatment". This approach is also found in: • Strategic Objective 3 where hazardous waste, unlike the others, is not highlighted as a waste stream. • NLWP 5.8 where hazardous waste is specifically covered as a sub type of waste arising within the main waste streams. • NLWP 6.5, where the position of hazardous waste as being different to – a part of – the main streams is brought out by the use of parenthesis. • In eg 7.1 the overarching policy for north London's waste, NLWP 7.3. • MM19 re 6.31 / Table 5 where hazardous waste is, "included in LACW, C&I and C&D targets". While in MM40 / NLWP 6.8 the identified land gap is stated as being based solely on the waste streams of LACW, C&I and C&D; that is by implication, including hazardous waste as a sub stream captured therein. The counter to this understanding and approach is evident in NLWP NEW 6.6 page 53 where it is indicated hazardous waste is a main waste stream in its own right equivalent to the others: • "the aim of the NLWP is to deliver the equivalent capacity for LACW, C&I, C&D and hazardous waste within its administrative borders" This latter choice appears to be the route	

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			followed in the plan and eg drives NLWP Revised Table 8 page 54, in which hazardous waste is taken as a waste stream in its own right and new land is planned for as such, irrespective of capacity surplus elsewhere. The submission should decide which of the two conflicting approaches it is to follow and amend throughout as required, for it cannot be both at the same time. At that time we would suggest consistency also be made throughout the plan documentation on two alternate routes frequently stated: • To achieve net self-sufficiency for LACW, C&I and C&D waste streams • To achieve net self-sufficiency for LACW and C&I and C&D waste streams We do not see these as being equivalent, and suggest the plan mostly follows the latter in its execution, albeit wrongly in our opinion and point out how London's approach to NSS instead looks across all these waste streams in aggregate.	
MM2 MM3	3.3 and 3.4	Pinkham Way Alliance	Commentary in the Sustainability Appraisal Addendum September 2020 in respect of MM2 indicates how the wording now reflects that of the draft London Plan. (We assume Policy S18 A). "In order to manage London's waste sustainably: 1) the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026" Draft London Plan 9.8.1 goes on to add:	The Boroughs disagree that the NLWP has taken a "different route" to net self-sufficiency than the London Plan. The comments misunderstand the concept of net self-sufficiency for North London and what type of capacity contributes towards "managing" waste in London. Net self-sufficiency in defined in the London Plan in Policy SI8.A.1): "the equivalent of 100 per cent of

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			"The term net self-sufficiency is meant to apply to all waste streams, with the exception of excavation waste." The draft London Plan's definition could be tighter in specifying that when it excludes excavation waste whether the resultant, "all waste streams" refers to them in aggregate, or individually, and if individually what then constitutes a waste stream (rather than a sub waste stream). It does however go on to adequately clarify the position when highlighting a specific example, for the draft London Plan 9.8.1 gives an example of a London NSS calculation, based on: • 7.5mt of London's own waste managed within London • 11.4mt of London's waste exported • 3.6mt imported waste managed within London. Logic would therefore suggest that London's own facilities were managing 11.1mt (ie 7.5 + 3.6). It would also suggest that London was producing 18.9mt of waste (7.5+11.4). NB: both imports and exports are fundamental to the London Plan's approach to NSS, not solely inherent arisings and capacity as is assumed in the NLWP. The London Plan calculation (9.8.1) concludes a NSS figure of "approximately 60%", or, based on the logical flow outlined above: 11.1 / 18.9 %, following the formula, NSS is - (Own produced waste managed PLUS managed imports) / (Own	London's waste should be managed within London (ie net self-sufficiency)". The NLWP has a similar definition of net self-sufficiency as "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 concept of net self-sufficiency is well understood by waste planners. The London plan is not clear about the source of the figures quoted in 9.8.1. However, it can be assumed that the figures include C&D and possibly E waste arising as the combined waste arising for LACW and C&I for 2021 is projected to be 8.2mt (London Plan Table 9.1) but the total waste arising is far more than this at 18.9mt (7.5mt + 11.4mt). It is not clear where the figure of 60% 'net self-sufficiency' comes from nor how it has been calculated so the Boroughs can't comment on this. However, waste planners measure net self-sufficiency by how far existing waste management capacity meets the amount of waste arising. It should be noted that the GLA is not a waste planning authority and waste planning is left to the Boroughs. Policy and guidance set out in the National Planning Policy for Waste (NPPW) and the National Planning Practice Guidance (NPPG) requires waste planning

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			produced waste managed PLUS exports). The equivalent NSS figure for North London, following the London Plan approach is 114%. The calculation is shown in Appendix 1. The NLWP thus starts from a basis of significantly achieving its core aim, without any need for extra land / capacity. We find this as no surprise, having previously highlighted a capacity base of circa 4.4mtpa versus an arisings level of circa 2.9mtpa. We note that the draft London Plan definition (or more specifically its execution) of NSS is at an aggregate level across all of the non-Excavation waste streams. This is instead of addressing each individual waste stream independently as taken by the NLWP. In going on to target actual land need rather than NSS we see the NLWP as seeking actual self-sufficiency (SS), albeit suggesting in the case of hazardous waste that the resultant fresh identified land may not be employed for that purpose. In previous submissions we have termed this implied capacity strategy," virtual self-sufficiency". It ignores exports and imports. The data is insufficient to develop a NSS calculation for each main waste stream plus one for hazardous despite it being the stated aim of the NLWP. It therefore cannot be targeted or managed. The latest SA assessment confirms the NLWP's chosen NSS definition is in line with the draft London Plan; the NLWP in its execution however	authorities to consider each waste stream separately. The NPPW (3) requires 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." The NPPG (22) states "assessing waste management needs for Local Plan making is likely to involve […] identifying the waste management capacity gaps in total and by particular waste streams". The waste streams are identified in para 13 of the NPPG and in 1.4 of the NLWP. The waste streams are well-established and these are the ones referred to in London Plan para 9.8.1 and planned for in the NLWP. However, imports and exports are not in themselves an indicator of net self-sufficiency. An area may have sufficient capacity to meet the equivalent amount of its waste arisings and yet still export and import waste. If there were zero waste imports and exports, this would be self-sufficiency not net self-sufficiency. Waste management capacity is defined in the London Plan at para 9.8.4. It excludes waste transfer stations which only sort or bale prior to transfer to another place for recycling, treatment or disposal. It is not clear from 9.8.1 which facilities receive waste imports to London. Some of this waste may be received at waste transfer stations which would not count towards London's waste management capacity, therefore it cannot be assumed that the 3.9mt

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			has taken a different route. That is now being reflected in the additional wording to MM2 and also deleted from MM3. There is a conflict between the capacity strategy of the core NLWP document and that in the SA Addendum October 2020. The Appendix of this latter document (page 95) highlights four capacity strategy options, as included in the SA January 2019. The following page (page 96) has Table C with five capacity strategy options. There is no alignment. The chosen strategy from Table C, Option 5, does not reflect that taken forward in the plan: • Option 5: Meeting the North London's arisings, net self-sufficiency for C&D and hazardous waste This is more than simply a permutation of several themes already outlined in commentary on other MM's and instead is a fusion of self-sufficiency for some waste streams, net self-sufficiency for others. Meeting North London's arisings for LACW and C&I, while targeting NSS for the other two mentioned waste streams (C&D and Hazardous) is not the Aim of the NLWP. Moreover, facts on the ground further undermine the intent, for consider LACW in the range of 800-1,000ktpa, a recycling target of 50% and yet a planned EfW plant of 700ktpa. A plan should be a guiding document and with the intent that it be achieved.	imported to London is equivalent to 3.9mt of waste management capacity. The NLWP can't influence where waste is managed. This is a commercial consideration. However, if every waste planning authority plans for net self-sufficiency, then there will be enough capacity to meet need, even if waste travels across administrative boundaries to be managed. This is the basis of planning for net self-sufficiency.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			Across the SA's capacity strategy option appraisal analysis, "don't know" holds a clear majority. On this, we concur. Looking at the matter from a strategic level, the approach of targeting SS (not NSS) based on individual waste streams has inherent risks of driving sub optimisation. Even basing capacity on the current figure of 3.5m tpa, rather than 2019's 4.4m tpa, when compared to an arisings figure of 2.9m tpa, it evidences considerable slack in capacity utilisation. Why operators would choose to maintain such a position is unclear. Why the plan then seeks further economic, efficiency and effectiveness burdens by seeking to generate yet more capacity through ignoring this considerable headroom is not clarified. We suggest the answer lies in not considering exports (1.4m tpa) and imports ("approximately" 1m tpa). These considerable volumes indicate a highly active, developed, and so very likely, efficient, market in waste management operating at a regional level – and beyond – rather than simply within North London, the focus of the plan's SS approach. There is nothing in the plan, or any clear rationale, why or how such considerable cross-border volumes – inevitable moving to specialist, or more efficient, or superior located sites – would, should or could be reversed. As we conclude elsewhere, administrative boundaries	

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			are effectively irrelevant versus other factors.	
MM3	3.4	Pinkham Way Alliance	Having been previously highlighted as "overarching principles" of the NLWP (NLWP 1.3), the (strategic) objectives are now shown as being "the steps needed to achieve the aim". Confusion concerning the plans skeletal hierarchy appears endemic. We would suggest a simplified approach is all that is required (and would be more helpful in understanding and execution) with a much simpler hierarchy of: • Aim • Objectives • Policies • Measures The existing Spatial Principles would be assessed against and then incorporated into (possibly slightly enhanced) objectives and the Overarching Policy dropped: the aim drives objectives which drive policies and aligned measurements are tracked.	No response. The plan is clear and this is a matter that could have been part of the earlier representations or hearings on the submitted plan.
MM4	2.27	Pinkham Way Alliance	An addition is suggested (**bold**). 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. <u>In</u>	This paragraph references specific policy approaches. The Boroughs do not consider the proposed changes add clarity to this. No change proposed.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			particular this includes reducing the reliance on disposal to landfill sites outside London, lowering CO2 emissions from road transport, ensuring new waste facilities generating energy meet the Mayor's Carbon Intensity Floor, directing new development to the most appropriate sites ~~and~~ **whilst** taking into account the greater occurrence of urban flood events **and the inseparable links between sustainable development, climate change and biodiversity**.	
MM5	4.2	Pinkham Way Alliance	"The Spatial Principles ~~Framework~~ flow from the Plan's Strategic Objectives and provides the strategic direction for the detailed policies of the NLWP and informs site/area selection. The principles take account of the spatial and wider policy context, the Plan's evidence base and the views of stakeholders. " It is far from clear what this section actually means: NLWP 4.1 indicates that the SP's provide the strategic direction for the policies; NLWP 1.3 that the (strategic) policies will be the means through which the SP's – as well as the aim and SO's – will be delivered, 1.3 having already highlighted that the aim and SO's have steered the direction of the NLWP. We suggest there to be an absence of clarity and consistency. That should be corrected.	The paragraph explains the role played by the Spatial Principles and is clear in this respect. PWA do not suggest how its claimed "absence of clarity and consistency" should be addressed. **PROPOSED CHANGE:** 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.
MM5	4.2	Pinkham Way Alliance	In its fourteenth year of development, and when noting the informing nature of the SP's and SO's in site / area selection (above), the need to	The Boroughs are confident in the sites and areas selection process. The reasons for the selection of the option chosen and the rejection of those not taken

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			reappraise sites / areas so fundamentally post EIP suggests a major weakness in approach, for as the Options Appraisal for Sites and Areas October 2020 Page 7 points out: "In order to better inform the choice of sites and ensure the site/area assessments are more detailed, holistic, robust and sensitive to a wider range of issues further work was undertaken to gather and assess any additional information on the proposed sites and areas" (Similar comments can relate to the dropping of the previous NLWP Base Option on Page 10 of the same informing document.) That is a big miss for thirteen years' work. The SA Addendum October 2020 is no less revealing when the earlier Base Option for Site / Area selection purposes is highlighted as being inferior to all five "new" options. The analysis goes on to choose an option that is no better than joint third best. It becomes difficult to reconcile 2019's apparently "sound" submission with such fundamental, but thinly argued, rethinks.	forward are provided in the Sites and Areas Reports. The NLWP under examination has been in development since 2013. No change proposed.
MM7	New after 4.11	Pinkham Way Alliance	Given that the plan says it will focus on capacity rather than land it would be more appropriate to quote capacity use in this section rather than actual land despite it making only minor differences to the position, eg (using WDS Part 3 2019 Tables 1-7) the capacity equivalents (%) become:	The Boroughs have not checked the veracity of PWA's figures but both sets of figures are very similar and show that Enfield contributes substantially more land and capacity than the other Boroughs. The outer North London Boroughs have more industrial land and therefore have more land in waste use and waste capacity. This is a historical legacy of land-use

<table>
<tr><th>MM reference</th><th>NLWP paragraph</th><th>Name/Organisation</th><th>Summary of representation</th><th>Response from the North London Boroughs</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><th></th><th>% North London waste land in use</th><th>As capacity % rather than land</th><th>London Plan apportionment % share for comparison</th></tr>
<tr><td>Enfield</td><td>62%</td><td>59</td><td>27</td></tr>
<tr><td>Barnet</td><td>18%</td><td>21</td><td>17</td></tr>
<tr><td>Haringey</td><td>12%</td><td>10</td><td>15</td></tr>
<tr><td>Islington</td><td><5%</td><td>5</td><td>8</td></tr>
<tr><td>Waltham Forest</td><td><5%</td><td>5</td><td>15</td></tr>
<tr><td>Hackney</td><td><5%</td><td>0</td><td>8</td></tr>
<tr><td>Camden</td><td><5%</td><td>0</td><td>10</td></tr>
</table>

We would emphasise that rather than focusing on a “better spread”, the NLWP as currently presented may have been better with a stated intent to “move waste management primarily to the outer London boroughs and seek a geographical coverage therein”.</td><td>patterns in North London.

No change proposed.</td></tr>
<tr><td>MM7</td><td>New after 4.11</td><td>Pinkham Way Alliance</td><td>At no point does the NLWP address geographic spread; rather it focuses on the administrative boundaries of the boroughs in considering site / area spread. This difference becomes other than minor when geography rather than administrative boundaries is considered, for eg:
• The site A22-HR Pinkham Way runs alongside the border of Enfield. While categorised within Haringey for the plan’s purposes, from a</td><td>While waste management does not observe administrative boundaries, the NLWP is obliged to take them into account. The NLWP plans for waste arising and waste capacity within the North London area comprising the administrative areas of seven Boroughs. The London Plan encourages Boroughs to collaborate by pooling their apportionment requirements (London Plan 9.8.6). While the Boroughs are working collectively on the NLWP, each</td></tr>
</table>

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			geographic perspective it may as well be in Enfield (or Barnet, where it also sits on the administrative border). • Waste formation does not follow administrative boundaries, rather geography. • Waste routes, key to eg SO2 and reducing movement, do not follow administrative boundaries, rather geography. (Although some administrative boundaries, at all levels, do follow geography.) • The commercial waste industry will assess geography rather than local government boundaries. • Local amenity (SP E) will tend to follow geography. • The Greenwich ruling identified geography rather than administrative boundaries as having the primacy in determining catchment. Conversely the boroughs decided not to follow the (borough focused) route of the London Plan apportionment when planning, instead choosing to pool the same in a geographical approach. As in many other examples throughout the NLWP we advocate consistency of approach. As the plan summarises (NLWP 4.9), "The objective is to reduce movements of waste, including waste exports, and increase the amount of waste managed in proximity to its source." This is a specific, quantifiable, geographic based objective – albeit it appears no evidence to	Borough brings their own individual political, land-use and policy context and the NLWP must take account of these.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			support the objective has been used to assist in identifying solutions, for the plan is waste-source location data free. The plan thus targets geography but addresses that target, incorrectly we conclude, by instead considering borough administrative boundaries. That is something not related to waste formation or the related actions of the waste management sector. This critical mismatch risks building in substantively sub-optimal decision criteria and subsequent conclusions.	
MM8	4.12	Pinkham Way Alliance	The combined Priority Areas and existing waste sites "…will help reduce movements of waste, including waste exports and increase opportunities for waste to be managed in proximity to its source." Yet see comments on Section 4.11 above	See response to 4.11 above.
MM8		Pinkham Way Alliance	This MM should be removed Elys Estate in Enfield stands out as the most suitable area by far in the Plan. It is large and can facilitate every type of waste identified. A small proportion of the area would be sufficient to absorb all of the predicted waste needs in North London with a relatively small proportion of the area impacted as pointed out by the Boroughs. Enfield, as a Planning Authority would have control over the type and size of any proposed development in the Area.	The NLWP has the opportunity to address concerns that there is an over-concentration of waste facilities in Enfield. This has been addressed by limiting the number of Priority Areas within Enfield.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			We consider the obstruction to its accessibility created by the proposed ranking of Priority Areas in Policy 2 is irrational. (see MM52 and MM53 below)	
MM9	New after 4.17	Pinkham Way Alliance	We would comment on the proposed MM9 but fail to understand what it means and so what it is seeking to achieve. We do note that Policy 2 contains no references to the collocation of facilities, nor can see how it encourages co-location of complementary facilities and are at a loss in seeing it providing a spatial focus towards land with similar uses, whether that be close to sensitive receptors or otherwise. We do however note that SP C is co-location centric.	Spatial Principle C is to encourage co-location of facilities and complementary activities. This is also referenced in paragraph 9.13, 9.23 and 9.36. London Plan Policy SI8.D.1) states "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". While it is not essential to repeat London Plan policy in the NLWP, it may help to do so here to clarify the delivery of Spatial Principle C. **PROPOSED CHANGE to Policy 2:** 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.
MM11	4.26	Pinkham Way Alliance	"Rail and road transport is particularly desirable when waste is travelling long distances."	This appears to be an error.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			We would fundamentally question this view regarding road transport. In a plan rooted in seeking sustainable transport (eg SP F: Support sustainable modes of transport; and SO7: To support the use of sustainable forms of transport) long distance travel by road would not appear "desirable". Beyond contradicting such core tenants of the plan, road transport's well-known pollution aspects such as climate impacting carbon generation and health impacting exhaust pollutants (PM10, PM2.5 plus smaller), particulates from brakes / tyres, plus road transport based externalities including the adverse health impacts of noise, congestion enhancement as well as an inevitable increase in overall road traffic accident risk through the use of more vehicles, do not suggest it as being "particularly desirable".	**PROPOSED CHANGE**: Rail and water ~~road~~ transport is particularly desirable when waste is travelling long distances.
MM12	New after 5.3	Pinkham Way Alliance	The suggestion is that the Data Study Addendum represents little more than clarification to ease understanding. We find it much more far reaching and fundamental in its realignment. Specific comments as they relate to the findings of the Data Study Addendum are incorporated in relevant sections of this submission where they apply to a MM or AM. On the Data Study Addendum itself however we would wish to make the following observations: Re Data Study Addendum- Executive Summary II	Table 3 of the Proposed Submission NLWP includes transfer facilities which is not included in the definition of waste 'management capacity'. This was considered confusing to the reader because the data is presented as if North London's management capacity is 4.4 million tonnes in 2018. This is not the case. The Data Study Addendum seeks to address this confusion by separating out the transfer capacity. This is explained in paragraph 4.4 and 4.5 of the Data Study Addendum.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			This suggests that the conclusion of the EIP was for greater clarity in how the data was presented. To the contrary, PWA believes it was not the issue of presentation that was the problem, rather one of approach. NSS was the matter of substantive discussion over both days of the EIP. As pointed out elsewhere in this submission, we believe that situation remains unresolved. Re Data Study Addendum- Executive Summary IV This indicates incorrectly that revisions have resulted in an increase in capacity. The capacity in the January 2019 NLWP of circa 4.4m tpa (NLWP January 2019 Table 3) is a great deal higher than the circa 3.5m tpa now revealed in Table 4.2 Revised NLWP Table 3 of the Data Study Addendum and now taken as the appropriate base. We therefore presume the summary should have read, " a decrease in capacity", and ideally go on to explain how that was counter to policy which works to maintain a future-floor on prevailing site capacity. Appendix 2 is a breakdown based on a site by site comparison between the last two NLWP submissions. Unexplained capacity loss by twenty nine individual sites over this brief period can be seen. January 2019 NLWP site data is listed in WDS3 2019 Tables 1 through 7, sourced from EW WDI 2007-20166 and represents the maximum throughput over that period. "Updated	The increase in capacity is explained in section 5 of the Data Study Addendum. Capacity is calculated by the maximum throughput a site has achieved over the last five years. This is the methodology adopted by the London Plan. The source of this information is the WDI. Throughput, and therefore "maximum capacity", changes from year to year and therefore North London's existing capacity changes from year to year. The Data Study Addendum took the opportunity to update site capacity where the maximum throughput pre-dated the last five years, to ensure it is in line with the London Plan methodology. No change proposed.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			information", contained in Data Study Addendum October 2020 Appendix B indicates more recent data is sourced "over the last five years", however as headlined on the Appendix sheets, this is actually the (same) period 2012-2016. Why so many active sites are revealed with a marked drop in capacity is not explained, nor is clear why this might be the case. Re Data Study Addendum 1.4 The inspector will naturally decide on data soundness but we suggest the conclusion of EIP discussions regarding both LACW (too high) and C&I (too low), yet argued by the boroughs that in aggregate were fine since that was in line with London Plan figures, was viewed as not being a satisfactory position. We also note there was no conclusion as to why the London approach of the apportionment, as was highlighted at EIP as being used successfully in the completion of the West London Waste Plan, had been ruled out without comment. Re Data Study Addendum Table 3.1: Growth Option This would benefit from reasons for changes and differences (where significant) from other tables to ensure robustness of the plans supporting evidence base. In particular: LACW 2020 Table 3.1 vs LACW Table 2.1 Revised NLWP Table 4, both in the Data Study Addendum, indicate a 16.7% increase (141,265t) in LACW	

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			from the 2016 base to the 2020 start point (845,776t increasing to 987,041t). This does not appear credible when compared to the NLWA's latest AMR (2018/19 s21 showing LACW at only 818,285t) and which reveals a general decline in the same waste stream over recent years. Re Data Study Addendum Table 3.1: Growth Option The assumed 2020 LACW start point in Table 3.1 at 987,041t is a full 168,756t (21%) above the latest actual figure (being for the previous year). We do not believe that is a remotely credible position to hold. This difference (error) is of the scale of the plan's identified LACW capacity shortfall and which translated into a need for fresh land. We therefore do we see that as a credible position to continue. Re Data Study Addendum 3.3 "Net self-sufficiency means providing capacity for the equivalent of waste generated and not for the actual waste generated" is precisely not what the NLWP followed in its approach to NSS. See eg Table 3.2 Revised Table 8 where the actual waste generated is indeed the chosen key determinant. Re Data Study Addendum 3.3 Regarding, "While it is important to understand how North London's waste is actually likely to be managed in the future, it is also key that the NLWP shows how much waste is expected to be	

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			managed within the area", we fully agree but do not see this evidence anywhere within the NLWP. To determine this matter requires and understanding of exports and imports and how they impact on the result of just how much waste will actually be managed within the area. We suggest this matter is the heart of NSS, not the self-sufficiency based capacity strategy which is followed in the NLWP. Re Data Study Addendum Table 3.2 Revised NLWP Table 8 We believe the approach presented is fundamentally at odds with the principle of NSS. The table contradicts the combined management approach agreed elsewhere as being appropriate for combining LACW and C&I waste streams for waste management / capacity purposes. The separation out of Hazardous waste contradicts some statements in the plan. Re Data Study Addendum 4.4 WDS Part 2 2019 Table 4 (and elsewhere in the 2019 submission) corrected previous NLWP assumptions that transfer stations were not undertaking any waste management function. Considerable extra capacity was added when this assumption was corrected. The plan now concludes that the London Plan does not see transfer capacity as managing waste contributors. That is very dependent on the function undertaken, but the London Plan is	

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			broad in what it does capture as “managed”7. Waste is deemed to be managed in London if any of the following activities take place within London: • it is sorted or bulked for re-use (including repair and re-manufacture) reprocessing or recycling (including anaerobic digestion) • It is reused, recycled or reprocessed. WDS2 2019 3.30 specifically references the draft London Plan requirements of “manged waste” when completing its derivation of capacity. Two approaches taken in successive submissions of the NLWP and based on the same London Plan requirement resulting in immensely different capacity outcomes cannot both be correct. The London Plan does highlight transfer stations as being particularly suitable locations to manage waste8. We have been unable to reconcile managed / not managed data from site listings with other tables in the plan (see commentary under MM27/28) but suggest that if transfer stations are excluded for the purposes of identifying current capacity, then under London Plan policy they should be included for the purposes of identifying suitable land to fill any apparent gaps. We would therefore conclude no fresh land is required whichever reading is chosen as being correct. Re Data Study Addendum 4.7	

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			Different approaches have been taken across the plan: "LACW and C&I waste streams are grouped together for this purpose for two reasons. Firstly, LACW and C&I waste is of a similar nature and facilities often manage both waste streams without differentiating them. Secondly, these two waste streams make up the waste apportioned by the London Plan, and therefore it is useful to count joint capacity for monitoring purposes." However, the contrary approach of separating the two waste streams was taken in Table 3.2 Revised NLWP Table 8. Implications follow, including the identified land need calculation, which would differ depending on which of the two approaches was being followed consistently across the plan. Re Data Study Addendum Table 4.2 Revised NLWP Table 3 This table reveals a total capacity of 3,536,019t in 2016. NLWP Table 3, pre-revision, revealed a capacity of 4,421,723t (dated 2018, but effectively the same date for comparison purposes). This update therefore represents a reduction of 885,704t, or 20%. We would expect to see evidenced rationale for such a fundamental change. Appendix 2 reconciles the two sets of data. It reveals numerous instances of the capacity of	

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			individual sites having been listed as reducing 2020 submission on 2019 submission (Column, "capacity change since 2019 submission"). Appendix 2 goes on to add an additional column (extreme right), using the maximum capacity for each site from either source. We would argue that since policy requires no reduction in capacity at individual sites such an analysis should better reflect the capacity under the plan's policies. At 4.517mtpa this figure is circa 1m tpa greater than the plan's latest claimed capacity figure for North London. As occurs in several instances we go on to highlight, data differences of a scale sufficient to remove the apparent capacity gap and hence need for fresh land are either unexplained or simply wrong. Re Data Study Addendum 5.3 We note the NLWA's stated intent not to build a replacement compost facility. This contradicts the intent to build a compost facility in NLWP 7.11 and NLWP New 7.11 Re Data Study Addendum 6.7 The latest data submission points out that it is unable to understand a key aspect of the previous data submission. Our own previous submission tackled the issue in detail. The greater issue is whether any of the two conflicting NLWP positions are themselves correct.	
MM14	Revised	Pinkham Way	The table includes casting errors in C&D (25,755t)	It is not clear what is being referred to as "casting

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	Table 4	Alliance	and E (10,979). It is not clear whether the total arisings figure is correct and its allocation incorrect, or the allocations are correct and the totalling incorrect. The overall difference, being of the order of 1%, however suggests no risk to fair conclusions being drawn. It would be sensible to highlight percentages to tie in with quotes in the preceding explanatory paragraph (MM13).	errors". **PROPOSED CHANGE** to MM13: Around 66% ~~50%~~ of waste generated in North London is managed in North London, ~~and this rises to 66% if~~ excluding excavation waste ~~is excluded from the total~~. The amounts of North London's waste managed within North London and elsewhere is set out in Table 4.
MM15	5.29	Pinkham Way Alliance	"Some of this capacity will be provided by existing facilities which import waste from outside North London." However, when calculating any fresh capacity requirement(s) no allowance for this element was made (as ultimately revealed in Table 3.2 Revised NLWP Table 8). The import figure is quoted only as "around I million". This total is not broken down into main and sub waste streams which form the core of the plan's NSS / land need calculation. If NSS is to (rightly) include imports in its derivation, then such a split would be required under the individual waste stream by waste stream approach followed by the NLWP.	This is a misunderstanding of net self-sufficiency. Net self-sufficiency means providing sufficient capacity to manage the equivalent of 100% of waste arising in North London. Net self-sufficiency allows for the reality of waste crossing administrative boundaries to be managed at the nearest or most suitable facility. The NLWP plans for net self-sufficiency.
MM16	5.27	Pinkham Way Alliance	The latest plan marks a 16.5% increase in recorded exports for 2016 from the previous NLWP submission (NLWP 5.27). This scale of adjustment after so many years is unnerving. There should be satisfaction that such core data is	675,788t is the amount of waste exported to landfill outside North London and 624,672 is the amount of waste exported to landfill outside London. The difference is sent to landfill within London. The same applies to LACW/C&I.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			accurate, timely and is being tracked accurately. 675,788t is quoted as going to landfill, whereas Revised Table 4 (MM14) reveals this total to be 624,672t, a difference of over 50,000t. The same table reveals the proportion of LACW/C&I going to landfill as 51% rather than the 33% figure quoted ({68,900+251,600}/624,672 %). If the 33% figure is correct then total landfill would have been 915,714t, considerable larger than revealed in the table. Reconciliation, consistency, and tracking have often proven to be difficult or impossible on plan provided data. Accuracy is compromised.	Waste data is notoriously inexact and it is not possible to be 100% accurate when generating waste data. This is a fact of waste planning and an issue for all waste planners. This is reflected in the NPPW which states "spurious precision should be avoided" when developing a waste evidence base. Waste imports and exports and their destinations change from year to year. The AMR will monitor data for imports and exports and highlight any trends.
MM17	New after 5.27	Pinkham Way Alliance	"North London is planning for capacity to meet the equivalent of 100% of its waste arisings". North London already has capacity far exceeding 100% of its waste arisings. (Earlier NLWP process submissions refer in depth.) Should planners have an alternate in mind they should clarify the wording, otherwise the comment should be dropped.	North London does not have sufficient waste management capacity to meet the equivalent of 100% of its waste arisings. This misunderstanding has come from including the transfer capacity which does not "manage" waste. The proposed changes seek to address this confusion.
MM17	New after 5.27	Pinkham Way Alliance	"It should be noted that exports from and imports into North London are not a measure of North London's net self-sufficiency. Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste need in North London, while recognising that some imports and exports will continue." We agree that imports / exports alone are not a measure of NSS, but conversely neither can their	This is a misunderstanding of net self-sufficiency. Net self-sufficiency means providing sufficient capacity to manage the <u>equivalent</u> of 100% of waste arising in North London. If imports and exports were nil then the North London Boroughs would have achieved self-sufficiency. This is not possible because North London cannot accommodate all the types of facilities to manage all the different types of waste arising. This is set out in 5.8.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			exclusion result in a satisfactory measure of NSS, as is being proposed. (See for instance draft London Plan 9.8.1.) We also note that the derivation of NSS as used in the draft London Plan does not include capacity as a metric, instead only its implied use as one means of managing waste to achieve NSS. The approach taken by the draft London Plan example, a NSS definition supported in the SA Addendum commentary, is: NSS is determined by (Own waste managed in the area PLUS managed imports) / (Own waste managed in the area PLUS exports). We view that as being logically robust, for: • Were imports and exports to be nil then the area would be in perfect NSS • Were managed imports to exceed exports then the area has a NSS above 100%, ie exhibiting more than enough capacity to notionally meet its own arisings; whereas • Were exports to exceed managed imports then the area has a NSS below 100%, suggesting fresh capacity, existing site intensification, alteration in the balance between exports and imports, or some other action may be appropriate to achieve NSS balance. We have the view from the evidence presented that the NLWP confuses and intertwines in its approach NSS and SS, follows both routes in parallel, and is unclear at what specific set of	Net self-sufficiency allows for the reality of waste crossing administrative boundaries to be managed at the nearest or most suitable facility. The NLWP plans for net self-sufficiency. The London Plan requires Boroughs to "allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste" (SI8.B.3) (our emphasis)

<table>
<tr><th>MM reference</th><th>NLWP paragraph</th><th>Name/Organisation</th><th>Summary of representation</th><th>Response from the North London Boroughs</th></tr>
<tr><td></td><td></td><td></td><td>waste streams it seeks to base its analysis on. The implication (risks) of not following London's requirement on North London (the apportionment) has been explored in a previous NLWP submission.</td><td></td></tr>
<tr><td>MM19</td><td>6.3 and Table 5</td><td>Pinkham Way Alliance</td><td>The mayoral target of 65% recycling of municipal waste by 2030 warrants a line of its own rather than being subsumed in individual targets for LACW and C&I which contribute to it. These individual targets should however also remain. Other targets highlighted in MM20 / NLWP 5.13 should also appear in the Table 5 of plan targets. We note that nowhere in the plan does it reveal that these targets will actually be achieved by its suggested implementation.</td><td>To add clarity to the way the Mayor's recycling targets are being planned for and monitored, it is proposed to make changes to Table 5 and Table 8 to focus on the 65% municipal waste recycling target which is the target required by the London Plan. Further explanation will be provided in the supporting text before Table 8 (see MM24).

PROPOSED CHANGE:

Table 5: Recycling and Recovery Targets with 2016 Baseline
<table>
<tr><th>Waste stream</th><th>Target</th><th>2016 baseline</th></tr>
<tr><td>LACW</td><td><s>50% recycling for LACW by 2025</s>
Contributing towards 65% recycling of municipal waste by 2030</td><td>27<u>9</u>%</td></tr>
<tr><td>C&I</td><td><s>75% recycling by 2030</s>
Contributing towards 65% recycling of municipal waste by</td><td><u>44</u><s>52</s>%</td></tr>
</table></td></tr>
</table>

<table>
<tr><th>MM reference</th><th>NLWP paragraph</th><th>Name/Organisation</th><th>Summary of representation</th><th>Response from the North London Boroughs</th></tr>
<tr><td></td><td></td><td></td><td></td><td>
<table>
<tr><td></td><td>2030</td><td></td></tr>
<tr><td>C&D</td><td>95% reuse/recycling/recovery ~~by 2020~~</td><td>93~~50-60~~%</td></tr>
<tr><td>Excavation</td><td>95% beneficial use</td><td>Not known</td></tr>
<tr><td>Biodegradable or recyclable waste</td><td>Zero biodegradable or recyclable waste to landfill by 2026</td><td>Not known</td></tr>
<tr><td>Hazardous</td><td>Included in LACW, C&I and C&D targets</td><td>N/A</td></tr>
</table>
</td></tr>
<tr><td>MM19</td><td>6.3 and Table 5</td><td>Extinction Rebellion Zero Waste</td><td>Recycling targets need to be continually reviewed and made more ambitious.</td><td>The NLWP reflects national, regional and local recycling targets.</td></tr>
<tr><td>MM20</td><td>5.13</td><td>Pinkham Way Alliance</td><td>We suggest inserting a broader and relevant context to the EC’s work (bold):
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. In addition, the Commission will put forward waste reduction targets for specific streams as part of a broader set of measures on waste prevention in the context of a review of Directive 2008/98/EC. The</td><td>The European Commission’s Circular Economy Package was transposed as part of legislation on 30/07/2020. This relates only to regulatory aspects of the CE package rather than policy. The UK has now left the European Union and any part of the CE package after the legislation date will not form part of UK law.

No change proposed.</td></tr>
</table>

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			Commission will also enhance the implementation of the recently adopted requirements for extended producer responsibility schemes, provide incentives and encourage sharing of information and good practices in waste recycling. All this shall serve the objective to significantly reduce total waste generation and halve the amount of residual (non-recycled) municipal waste by 2030. The Circular Economy package ……..	
MM20	5.13	Extinction Rebellion Zero Waste	The Plan should set out a realistic account of how the recycling targets could be achieved.	The NLWP is just one in a range of documents, policies and strategies by a number of organisations, including the GLA and NLWA, which will help meet the recycling targets. The NLWP is a land-use plan and its role is to "identify sufficient opportunities to meet the identified needs of their area for the management of waste streams" (NPPW para 3) and to "identify […] sites and/or areas for new or enhanced waste management facilities in appropriate locations" (NPPW 4). In other words, the NLWP's role is to identify existing capacity and land suitable for recycling facilities to provide the capacity to meet the recycling targets. The Boroughs, as waste collection authorities, are required by the GLA to prepare Reduction and Recycling Plans. The NLWA also have a responsibility to prepare a strategy on how they will meet the Mayor's LACW recycling targets.
MM23	New Table	Pinkham Way	The table suggests a fundamental	**PROPOSED CHANGE**:

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
	after 6.4	Alliance	misunderstanding: Row 3 refers to "Net self-sufficiency Options", and goes on to list these as: • Meeting the London Plan Apportionment • Net Self Sufficiency • Self – sufficiency All of these are capacity options, only the second is a NSS option. (Options Appraisal 2019 1.5 correctly identifies this choice as being one of capacity strategy.)	~~Net self-sufficiency~~ Capacity options
MM23	New Table after 6.4	Pinkham Way Alliance	Row 1 refers to "options considered for forecasting North London's waste arisings". NSS is certainly not a means to this particular end. The heading for the table should reflect what it actually presents	**PROPOSED CHANGE**: Change title of table as follows: Options considered for forecasting North London's waste arisings and need
MM23	New Table after 6.4	Pinkham Way Alliance	The listed Management Options bear no relation to objectives or targets set elsewhere in the plan, eg: • why is 9% Treatment a scenario? • Median C&I recycling of 80% actually appears to be a stretch versus the plan target of 75%. • The Maximised targets for C&D and E are actually core plan requirements. A management option with the required plan targets developed as a scenario (see MM19 / Table 5) would certainly seem an appropriate option to assess.	No response. A range of management options were considered, taking into account the potential to increase recycling through the changes in waste collection, processing and treatment practices. Details are provided in Data Study Part 2. The Boroughs remain confident in the modelling assumptions, options and selection process. This is a matter that could have been part of the earlier representations or hearings on the submitted plan.
MM23	New Table after 6.4	Pinkham Way Alliance	The LACW target of 44% recycling by 2035 falls short of the requirement of the plan. MM19 / Table 5 specifies the requirement at 50%	**PROPOSED CHANGE** to New below 6.6 (MM25): […]

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			by 2025. The 50% target is highlighted as a major contributing element of the 65% municipal target, when combined with C&I. We note this is said to be "Maximising Recycling" scenario. Despite a plan scenario based on 44%, against a plan target of 50%, Table 3.2 Revised NLWP Table 8 reveals a projected 2035 plan outturn of only 43%. This adds weight to the previous (EIP) evidence that the use of the NLWA forecasting model is not fit for the purposes of the NLWP.	[…] Table 8 sets out waste arisings over the plan period and how much of the total will need to be recycled to meet the Mayor's targets shown in Table 2. The LACW figures in Table 8 are taken from the NLWP data study which reflects the NLWA modelling. The NLWA model is based on achieving 50% household waste recycling. Over 80% of total LACW is household waste and the remainder is mostly business waste. The NLWA model assumes business waste recycling improves gradually over time as business waste recycling continues to be encouraged and recycling behaviours change. The combined household and business waste recycling rate in the NLWA model is 44%. In order to meet the Mayor's target of 65% recycling of municipal waste by 2030, around 85% of the 'municipal' portion of the C&I waste stream needs to be recycled. The 'municipal' portion of the C&I waste stream is estimated to be around two thirds of the total [footnote]. The recycling rates for the municipal portion of the C&I waste stream rise to 85% by 2030 which, together with household and business waste recycling in the LACW waste stream, achieves 65% recycling of municipal waste by 2030 in line with the Mayor's target. The C&D waste stream has a recycling rate of 95% and excavation waste a beneficial use rate of 95% in line with the London Plan targets. [footnote] Separate figures for municipal and other

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				C&I waste are set out in the Data Study Addendum Appendix A: Waste arisings forecast scenario taken forward in the NLWP.
MM23	New Table after 6.4	Extinction Rebellion Zero Waste	For the LACW column in the new table, it would be helpful to clarify how the figures and dates given for recycling relate to the Mayor's targets and the LES policies and proposals as well as the impact of transitioning to a circular economy.	See MM24 for proposed change.
MM24	6.4 (part)	Pinkham Way Alliance	The plan's development considered capacity strategy options rather than net self-sufficiency options, as has been mistakenly adjusted in the wording.	**PROPOSED CHANGE**: ~~Net self-sufficiency~~ Capacity options
MM24	6.4 (part)	Pinkham Way Alliance	"Maximised Recycling was chosen as the preferred option for the management strategy because it aligns with national, regional and local recycling targets." As outlined in our commentary on MM23, it doesn't.	Response as per MM23
MM24	6.4 (part)	Extinction Rebellion Zero Waste	What growth rate was used for LACW? The NLWA recycling targets are not in line with LES targets. Commentary on GLA and NLWA modelling.	The growth rate used in the NLWA model vary by year and waste stream (LACW, C&I, other). Further details can be found in the NLWA waste forecast model here. The NLWA modelling was undertaken before the LES was published. The NLWA have a responsibility to meet the Mayor's targets and will set out their approach in their next joint waste strategy which is expected to be prepared 2021-2022 (see MM58). The NLWP uses the NLWA waste arisings modelling and a change is proposed to the New para below 6.6

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				to explain how the NLWA and NLWP models work together to meet the Mayor's targets: **PROPOSED CHANGE** New below 6.6 (MM25): […] […] Table 8 sets out waste arisings over the plan period and how much of the total will need to be recycled to meet the Mayor's targets shown in Table 2. The LACW figures in Table 8 are taken from the NLWP data study which reflects the NLWA modelling. The NLWA model is based on achieving 50% household waste recycling. Over 80% of total LACW is household waste and the remainder is mostly business waste. The NLWA model assumes business waste recycling improves gradually over time as business waste recycling continues to be encouraged and recycling behaviours change. The combined household and business waste recycling rate in the NLWA model is 44%. In order to meet the Mayor's target of 65% recycling of municipal waste by 2030, around 85% of the 'municipal' portion of the C&I waste stream needs to be recycled. The 'municipal' portion of the C&I waste stream is estimated to be around two thirds of the total [footnote]. The recycling rates for the municipal portion of the C&I waste stream rise to 85% by 2030 which, together with household and business waste recycling in the LACW waste stream, achieves 65% recycling of

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				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.
MM25	New below 6.6	Pinkham Way Alliance	"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)." Rather than showing NSS, this – as well as the resulting land identification – is based on self-sufficiency, one of the capacity options not taken forward from the options appraisal exercise.	This is a misunderstanding of net self-sufficiency. Net self-sufficiency means providing sufficient capacity to manage the equivalent of 100% of waste arising in North London. If imports and exports were nil then the North London Boroughs would have achieved self-sufficiency. This is not possible because North London cannot accommodate all the types of facilities to manage all the different types of waste arising. This is set out in 5.8. Net self-sufficiency allows for the reality of waste crossing administrative boundaries to be managed at the nearest or most suitable facility. The NLWP plans for net self-sufficiency.
MM25	New below 6.6	Extinction Rebellion Zero Waste	The NLWP lacks ambition when it states "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."	This refers to the NLWP's role as a land-use plan. It is the responsibility of the Boroughs to prepare Waste Reduction and Recycling Plans and NLWA to prepare a strategy to prevent waste and reduce, re-use and repair. National government will also be preparing a

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				waste prevention plan. When material does become waste, it is the role of the NLWP is to identify sufficient existing waste management capacity and land suitable for new waste capacity (recycling and recovery) to manage the area's waste over the next 15 years.
MM26	Table 8 Revised	Pinkham Way Alliance	There are four totals indicating "…capacity required for net self-sufficiency". In each case the total sum is not that required for NSS but instead for achieving self-sufficiency. The table reveals a LACW recycling result of 43% in 2035 and an equivalent for C&I or 71%. Both projected outcomes fall noticeably short of the required targets. We calculate the 2035 combined recycling outcome at 56% versus a 65% target requirement. Proposing a plan which fails to meet its targets, and one that is so heavily specified as maximum recycling centric, should realistically be viewed as inadequate.	The row for "capacity required for net self-sufficiency" is the total waste arisings. Providing waste management capacity to meet the equivalent of waste arisings is net self-sufficiency. **PROPOSED CHANGE** throughout Table 8: **Total […] waste arisings (capacity required for net self-sufficiency)**
MM26	Table 8	Extinction Rebellion Zero Waste	It would be helpful to set out how the figures given for LACW waste streams relate to the Mayor's targets and the LES policies and proposals for recycling.	See response to MM24. **PROPOSED CHANGE**: Renumber the Tables so they are consecutive and amend supporting text accordingly.
MM27 MM28	5.5 and Table 3	Pinkham Way Alliance	We have highlighted the unexplained drop in capacity from c 4.4mtpa in the previous submission to the current c 3.5mtpa.	Response as per MM12.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			Separately it has not been possible to reconcile Table 4.2's split between managed and not-managed waste with a satisfactory degree of accuracy. Appendix 4, based on identified plan source data, suggests a managed waste total of 2,429,775t rather than the 2,310,951 for the equivalent figure from Table 4.2: Revised NLWP Table 3. (Or a slightly lower figure from NLWP Table 3 owing to the plan's incorrect translation between documents highlighted below.) At 118,824t (Data Study Addendum basis) the difference is of a scale to substantially or completely close the apparent capacity gap. Table 4.2 (the source document for NLWP Table 3) has been translated into the NLWP with an unexplained 13,705t loss of LACW capacity.	
MM28	Table 3	Pinkham Way Alliance	The description is of capacity at the start of the plan period (2020?) but the data is quoted as being from 2016.	**PROPOSED CHANGE**: 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~~ Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2012-2016
MM29	5.6	Pinkham Way Alliance	Comments made under Waste Data Study Addendum 4.4 are pertinent. We do not believe this MM is reflective of the actual or required position.	Response as per MM12.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
MM29	5.6	Pinkham Way Alliance	The following section has been deleted, yet it remains true and in our view highly pertinent to the plan. (Table references would require updating.) "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."	Response as per MM12.
MM31	8.5	Pinkham Way Alliance	The site specific data for the Edmonton EcoPark does highlight annual throughput peaking at close to 600,000 tpa but in referencing the DCO it is worth pointing out that the NLWA owners in their submission specifically referenced the capacity as being 540,000tpa10 . It would thus appear to be a good example of an existing site being intensified to absorb greater capacity, in line with London Plan guidance. Previous versions of the plan have worked with 550,000tpa, so adding net 150,00tpa capacity as a result of the planned new EfW facility referenced in the DCO rather than the currently revised 100,000tpa. No resulting plan issues, other than an absence of consistency, would seem to apply to this recent change.	Throughputs changes from year to year and therefore the reference capacity will change from year to year. Throughputs for each facility over the last five years are set out in Appendix 2 of the Data Study Addendum (see ENF18 for the EfW facility).

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			We do however record the intent to import waste to the DCO based plant in which case NSS implications may occur. We are not commenting on that given the absence of clear information and the deep uncertainty over the NSS approach being followed.	
MM32	8.6	Pinkham Way Alliance	Rather than 2020 the composting facility was closed in 2018. Irrespective of the date policy requires compensatory capacity be identified rather than a loss simply being "booked" as is highlighted here.	Compensatory capacity is only required if a site is being redeveloped for a non-waste use. The composting facility lies within the wider Edmonton EcoPark site and is not being redeveloped for a non-waste use.
MM32	8.6	Pinkham Way Alliance	"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." This section has been deleted but we understand remains the intent for the site. As such the related capacity should also be included in the calculation to determine any capacity gap (or not, as the case may prove).	The deletion shown in the Schedule of MMs is an error. The sentence remains as per the track changed version. **PROPOSED CHANGE**: 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.
MM32	8.6	Extinction	How is the loss of the composting facility in	The NLWA's DCO allows for the loss of the composting

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
		Rebellion Zero Waste	Edmonton, with no intention to replace it, consistent with the declared aim to move upward in the hierarchy of waste?	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 been built into the calculation of the capacity gap. Compensatory capacity is only required if a site is being redeveloped for a non-waste use. The composting facility lies within the wider Edmonton EcoPark site and is not being redeveloped for a non-waste use. Garden and food waste collected by the north London councils will still be managed but not on the EcoPark site. Food waste is sent to anaerobic digestion facilities in Hertfordshire and garden waste is sent for composting at facilities in the east of England.
MM33	8.10	Pinkham Way Alliance	Powerday is listed having throughput of 49,754 tpa11. This latest figure is approximately half the 93,900 tpa capacity quoted for the same site in the previous NLWP submission.12 Powerday has a capacity of 330,000t. This capacity, enhanced when moving up the waste hierarchy from the previous WTS to a MRF, is the correct total to be incorporated into the calculation to determine any capacity gap (or not, as the case may prove) for consider: • The MM correctly identifies that the new facility	Capacity is calculated by the maximum throughput a site has achieved over the last five years. This is the methodology adopted by the London Plan. The source of this information is the WDI. Throughput changes from year to year. Throughput for Powerday over the last five years is set out in Appendix B of the Data Study Addendum (see ENF26). The maximum 2012-2016 is 49,754. There is no evidence that Powerday is achieving a throughput of 330,000tpa. For information, the most

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			was opened in 2015. The development can be viewed in a time lapsed video o https://www.youtube.com/watch?v=0vAmVKxr4lU • Opening was undertaken by the host borough's Cabinet Member for Economic Regeneration o https://www.circularonline.co.uk/news/powerday-commences-operations-at-enfield-facility/?gclid=EAIaIQobChMIi_i0x-jj7AIVD9d3Ch0kYgCNEAAYASAAEgKbjvD_BwE • The company themselves confirm the 330,000t capacity o https://etfc.london/sponsor/powerday • They further identify it as one of the two largest MRF's in Southern England. • In 2018 they intensified their approach via the commencement of 24 hr working o https://www.letsrecycle.com/news/latest-news/powerday-switches-to-24-hour-opening-in-enfield/ The MM thus appears to have insufficient context versus the actual position. Previous derivations of the NLWP have used the 330,000t MRF capacity of in their calculations and evidence is strongly in favour of retaining the previous plan submission assumption of this capacity rather than "monitoring throughput". We note the planner's site visit was undertaken	up to date data from 2019 shows Powerday has a throughput of 94,586 and this increase in capacity will be included in the NLWP Annual Monitoring Report.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			on 23rd August 2013. Our own approach to the company CEO in November 2020 confirmed our position. We further note that this change will have significant implication for the apparent land gap calculation - to the extent that it will be removed.	
MM33	8.10	Pinkham Way Alliance	We note that Powerday provides hazardous waste facility • https://powerday.co.uk/hazardous-waste/	Powerday's hazardous waste transfer facility is outside North London in OPDC / Hammersmith & Fulham.
MM35	8.12	Dump Donoghue	• Para 8.12 should be updated to reflect changes to Brent Cross Town regeneration. • Barnet's Local Plan draft policy ECC03.d should reflect the release of waste sites as part of Brent Cross Town regeneration and provide consistency with NLWP para 8.12.	The planning position with the WTS remains unchanged insofar as permission has been granted on the basis that the Hendon WTS capacity is replaced. The leasing of Seneca is intended to be only a temporary solution and the intention is still to build the WTS. The text in 8.12 still describes the current position. However progress with the delivery of BXC the text can be amended as below. **PROPOSED CHANGE**: […] 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~~. […] To further clarify Barnet's Draft Local Plan Waste Policy the text of Policy ECC03 will be amended as follows (changes in blue):

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				d) safeguarding all existing waste facilities in Barnet, as set out in the NLWP, and that for any waste site subject to redevelopment for non-waste uses the developer must clearly demonstrate to the satisfaction of the Council that compensatory capacity will be delivered in line with the NLWP spatial framework principles on a suitable replacement site that must at least meet, and, if possible, exceed, the maximum achievable throughput of the site proposed to be lost. e) Seeking to utilise~~ing~~ additional waste capacity at Scratchwood Quarry as set out in the Schedule of Proposals.
MM36	Table 6	Pinkham Way Alliance	The explanation that two facilities have closed in Waltham Forest to be replaced by equivalent capacity in Enfield does not align with the data supplied: Appendix 2 of this submission shows sites listed in Data Study Addendum October 2020 Appendix B alongside the equivalent data from WDS Part 3 2019. There is an (unclear) small difference between the listed capacity for the two sites in question (WA4 and WA17), but both sites are in evidence across both lists. Appendix 3 of this submission compares the site list from the Data Study Addendum with the SA Addendum listing of September 2020. In this SA listing there is an element of double counting and a mix up of certain Enfield site	The NLWP uses baseline data from 2016. Information about waste facilities, including their throughput, can change from year to year with each new release of data. Each update of the data study has captured any new information. It is an ongoing but necessary part of the NLWP process and will continue after adoption through the NLWP Annual Monitoring Report. Any changes to capacity and facilities after 2016 will be included in the NLWP Annual Monitoring Report.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			names with capacity from different Enfield sites, but under ENF37 GBN is clear reference to a capacity of 276,855t. At this point both sites WAF4 and WA17 have been reduced to nil – transferred to ENF37 is the suggestion in the text. However, the implied net increase of capacity so revealed, circa 200,000tpa, has not been incorporated into calculations. The MM indicates the site may provide capacity on top of what has been replaced. The SA Addendum would indicate rather this is indeed the case, as does Table 4 WDS2 2019. A correction of significant scale therefore appears warranted in several areas of the plan's documentation. The wasted resource and proven inconsistency from generating individual versions of site listings is an ongoing, unnecessary, feature of the NLWP process. It has long been grossly inefficient and so was subject to our input as part of an earlier consultancy exercise. Like much else that eventually comes round again, it was ignored. In July 2014 we submitted: The first NLWP (1) identified 68 (protected) waste sites within North London. The current NLWP (2) highlights 55 operating waste sites (text), or 60 Waste Data Study Section 3 Table 2 or 61 (Data Study Part 2 Appendix 2). Whichever is deemed the appropriate figure, at this rate of implied attrition, all operating waste sites would	

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			disappear within the plan period suggesting a greater focus on the protection requirement of the London plan may be warranted. NLWP (2) and waste planners may find learnings from developing and specifying a single site audit / knowledge bank document, starting from the early documentation supporting NLWP (1) through to the present. Tracking for instance the near 6mt waste capacity identified across the sub Region in earlier papers to the current understanding; overlain with what is / is not countable under certain criteria such as London Plan calculable sites could only be useful as well as, I suspect, resource efficient. A single document of such form, including aggregated totals and relevant sub totals, unlike Tables and Appendices in the current NLWP (2) which suffer from the absence of simple aggregates being included, would make for an improved planning base. In this cycle for instance we note no consistency of site listings between, eg: • Appendix B Data Study Addendum October 2020 • Tables 1-7 WDS Part 3 2019 • Table 17 Schedule 1 NLWP January 2019 • Appendix 7 Sites and Areas Report January 2019 We would now add to the suggestion that it should be a controlled document.	
MM37,	6.7, New	Extinction	Any plans for new incineration capacity should be	Any planning application for new waste capacity will

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
MM39		Rebellion Zero Waste	subject to environmental review with a focus on the climate and ecological emergencies and there should be a clear timeline for engagement and consultation across the seven boroughs.	be assessed through the statutory planning process which include environmental and consultation standards. Incinerators without energy recovery would not be allowed in North London due to the carbon intensity floor. New EfW facilities below 50 megawatts would be assessed against NLWP policies 2 and 3 which require development proposals to manage waste as far up the waste hierarchy as practicable. New EfW capacity would also be assessed against national, regional and local environmental policies as well as those in NLWP Policy 5. An energy from waste facility more than 50 megawatts is considered a major infrastructure project and will be considered through the Development Consent Order (DCO) process against National Policy Statement for Renewable Energy Infrastructure (EN-3) and any such proposals will be assessed against national, regional and local policies.
MM38	Table 6	Extinction Rebellion Zero Waste	The LACW/C&I section includes a single line to cover projections combining the various sorts of waste but for capacity there are separate lines for recycling/ composting and 'recovery'. This suggests that it would be appropriate to incinerate waste that could be recycled or composted – we hope that is not intended. According to Table 6, the planned increase in capacity relates solely to waste incineration and	It is not intended to suggest that waste which can be recycled/composted will be sent to EfW. The "existing and pipeline capacity - recovery" row in Table 6 reflects existing recovery capacity and any new recovery capacity with a planning permission. For LACW/C&I this is the NLHPP facility which is in the 'recovery' tier of the waste hierarchy. There are no other pipeline facilities.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			not at all to recycling or composting. What is the justification for this?	
MM39	New para after Revised Table 6 now Table 8	Pinkham Way Alliance	The staleness and sparsity of contact with existing operators has been highlighted at earlier stages of the plan preparation and EIP. It would be appropriate if "The North London Boroughs contacted existing waste operators to find out if there are any current plans to upgrade or intensify their facilities", refers to current as in the present day, or merely relates to previous attempts to fulfil this need.	The Boroughs consider the approach to contacting existing operators proportionate. Operators are not always willing to share their plans with the Boroughs, or may have no plans to expand their operations, but they have been contacted at each stage of the NLWP's progress.
MM4	2.27	Extinction Rebellion Zero Waste	The Plan's approach to climate change should include reducing greenhouse gases with the goal of net zero emissions, reducing waste, improving recycling rates, promoting repair and reuse, and developing a circular economy.	The NLWP will form part of each Borough's Development Plan which, which also includes the Local Plan and the London Plan. The policies in all of these planning documents provide the framework for planning and it is not necessary to repeat policies which are contained in another document. While the NLWP reflects national, regional and local targets it does not, and should not, create strategies and policies which are the responsibility of national government, the GLA or the NLWA. Each Borough has set out their own response to the climate emergency. The purpose of the NLWP is to set out the planning framework for waste management in North London for the next 15 years. It is primarily a land-use plan, and identifies existing capacity and land for new capacity to meet identified waste needs. It also includes policies for determining waste planning

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				applications. While the NLWP does not include a separate climate change policy, mitigating climate change forms part of Policy 5, including the design, construction and operation of waste facilities. In addition, reducing GHG emissions is addressed through policies related to managing waste as far up the waste hierarchy as possible (Policies 1 and 2), reducing the need to transport waste longer distances by identifying areas within North London for new waste facilities (Policy 2) promoting sustainable transport options (Policy 5), environmental and air quality protections (Policy 5), signposting the London Plan's carbon intensity floor requirement (Policy 6). Policy 5 also requires circular economy statements in line with London Plan Policy SI7. We have proposed some changes to Policy 5 and the supporting text below in light of specific comments.
MM40	6.8	Pinkham Way Alliance	We would suggest removal of the section, "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", for as we point out, the NSS approach of the NLWP is not that of the London Plan, we do not even believe it to be NSS, and as we also cover, the evidence base does not indicate a need for new capacity (land).	See response to MM2/MM3. No change proposed.
MM40	6.8	Pinkham Way	We note the SA Addendum comment relating to	Table 8 sets out how much capacity is required to

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
		Alliance	this MM concludes that NSS should be achieved earlier (2026) than expected in the previous submission (2035). The point has been raised previously but it is not evident how and by when NSS is being shown to be met. The comment goes on to say that post 2026, after which it is assumed the plan will have achieved its NSS aim, Priority Areas can be assessed for necessary waste use or released for other development purposes. If the aim of NSS has been achieved, then there is no further necessary waste use requirement. If there are indeed other aims of the NLWP – and see Page 2 AM NLWP 1.3 – those should be made explicit.	meet net self-sufficiency in North London for each waste stream and by when. The AMR will monitor this. If net self-sufficiency has been achieved, para 9.8 (MM72) sets out how waste sites may be released for other uses. The achievement of net self-sufficiency does not prevent the development of new waste facilities in North London.
MM41	New Table	Pinkham Way Alliance	We note Powerday has a 60,000tpa hazardous waste capacity based on 3.9h of land (See MM33 commentary). That indicates a tonnes / hectare conversion factor of 15,000 may be a more appropriate figure, rather than the plan's use of 10,000t/h for hazardous recycling and treatment. Were there to be any hazardous capacity gap this would then have the effect of reducing fresh land needs.	This Powerday facility is a hazardous waste transfer station for construction waste and as such does not "manage" any hazardous waste. A hazardous waste management facility would have a smaller throughput per hectare.
MM41	New Table	Extinction Rebellion Zero Waste	This table suggests the possibility of additional EfW facilities. The document needs to be far more explicit about what is envisaged and how plans will be developed and justified.	Each type of facility requires a different amount of land and the New Table sets out typical throughputs per hectare for each type of waste facility. This is taken from the Data Study and is provided in the context of land-take assumptions to calculate land requirements set out in Table 7. It has been included

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				here in response to comments received during the Regulation 19 consultation. The NLWP reflects the NLWA strategy for managing LACW and for other waste streams the NLWP relies on the market to deliver new waste facilities and it is not possible to say with any certainty what type of facilities will come forward during the plan period. New facilities would be assessed against NLWP policies 2 and 3 which require development proposals to manage waste as far up the waste hierarchy as practicable.
MM42	Table 7	Pinkham Way Alliance	The table should be removed. As covered elsewhere, aspects such as: • An incorrect approach taken to NSS • An incorrect LACW figure used in the year zero start point • An inflated LACW forecast • The exclusion of Powerday capacity Individually, but certainly in aggregate, remove the calculated capacity gaps and thus any resulting land need. The circa 200,000tpa ENF37 GBN capacity also identified as missing from the plan is C&D related and so will have no impact on the LACW/ C&I calculation. It may however, depending on the features of the site, have hazardous waste calculation implication. There will be many related changes required elsewhere in the plan documentation.	The Boroughs consider this useful to indicate the amount of land required in North London to meet the capacity gaps. The assumptions and calculations are considered sound. No change proposed.
MM42	Table 7	Pinkham Way Alliance	Considering Table 7 and its apparent LACW shortfall of 174,579t (year 2035) / 1.5h and the	

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			comment within AM 5.4 Table 2, "Waste arisings vary from year to year and these figures represent a snapshot in time", to put the near 175,000tpa apparent shortfall in perspective versus other metrics covered in this submission: • Year zero LACW figure is of the order of 168,756t too high • 280,000t of Powerday capacity has been incorrectly removed • Close to 1 million tonnes of capacity has been removed since the plan presented for EIP in 2019 The LACW year zero capacity gap (MM38 / Table 6), would disappear with any of the above corrections. In addition, the LACW forecast additionally has the potential (trend) to be several hundred thousand tons above actual. (See previous submissions / EIP) We have previously argued that for LACW the future trend will be one of dampening of arisings rather than the upward trend long presented in plans - and equally long shown to be incorrect. The NLWA finally appears to be taking a similar forward view since their residual waste reduction plan of 13 February 2020, summarises, the objective of that plan is "To reduce local authority collected waste arisings in north London"13. We would suggest that while the plan (rightly) looks at matters of recycling, key trends, such as prepared by ARUP to inform the London Plan on	The Boroughs do not agree that there are data errors. Changes to the way data, including capacity, is presented in the NLWP is set out in the Data Study Addendum. Table 7 indicates the amount of land needed to meet the capacity gaps identified in Revised Table 6. LACW arisings have been taken from the NLWA model. The capacity for Powerday is taken from actual throughput data in the WDI rather than speculative information. No waste management capacity has been "removed" but the data on waste capacity (Table 3) has been presented more clearly by separating out transfer capacity which does not contribute to the 'management' of waste as defined by the London Plan. This is to address the confusion caused by the way the capacity data was presented in previous version of the plan.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			the anticipated impact of an economy embracing the circular economy, also have substantive impact on the volume of end use arisings. The NLWA's own forecasting was undertaken prior to the ARUP analysis used to inform the London Plan. Options Appraisal for Sites and Areas October 2020 page 10 highlights the 2019 submitted land base of 316.32h. The LACW 1.5h – identified for 2035 – is therefore less than 0.5% of this total. Being as it is stated, a snapshot in time, we believe that should be well within the realms of intensification potential of the existing network. It is certainly well within the realms of NLWP data errors.	
MM42	Table 7	Extinction Rebellion Zero Waste	Table 7 suggests that any additional capacity for LACW waste would be limited to recycling and also that any additional capacity in 'recovery' or 'treatment' would relate solely to hazardous waste. Could the Plan clarify this. It would be helpful to be explicit about the relationships between the recycling targets, the waste projections, the identified capacity gap and the land requirements – in particular, is this requirement in addition to the capacity gap previously identified? Or are the waste projections consistent with the recycling targets in some way that is not made clear?	The aim of the NLWP is to identify sufficient sites and/or areas in appropriate locations to meet the identified needs of North London for the management of waste. Revised Table 8 sets out the total amount of waste expected to be generated in North London over the plan period. Capacity to manage the equivalent of waste arising is required in North London to meet North London's target for net self-sufficiency. Table 8 also shows how much of the total amount of waste arising needs to be recycled in order to meet the Mayor's recycling targets (shown in Table 2). Table 3 shows existing waste management capacity in North London and Revised Table 6 shows the different

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				between waste needing to be managed (Table 8) and existing capacity (Table 3). This is the capacity gap. Table 7 indicates the amount of land needed to bridge the gap between existing capacity and capacity required to meet need. The gap for LACW capacity is recycling and there is a gap for hazardous waste capacity for recycling and recovery/treatment. This is explained in Table 7 and supporting text. However, the NLWP cannot force operators to build these types of facilities in North London. The plan seeks to ensure enough land is available for a range of waste facilities to create flexibility for any new technologies which may come forward. Whilst the plan is technology-neutral, it seeks waste facilities which drive waste up the waste hierarchy.
MM43	6.10	Pinkham Way Alliance	The section refers to a need for additional land to manage hazardous waste. As argued elsewhere, that need is unproven and so the section should be removed.	The calculations for hazardous waste arisings, capacity and land take assumptions are considered sound.
MM44	New after 8.1	Pinkham Way Alliance	"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."	North London does not have sufficient capacity to meet its waste management needs. Therefore land is required for new facilities to meet the capacity gap. This is evidenced in the Data Studies and explained in section 6 of the NLWP.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			The section refers to a need for additional land. As argued elsewhere, that need is unproven and so the section should be removed.	No change proposed.
MM45	8.2 Restructured	Pinkham Way Alliance	An insertion is required to bring this MM into line with MM44. 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, **and is in line with London Plan guidance identifying existing waste sites, Strategic Industrial Land (SIL) and Locally Significant Industrial Sites as a focus for new waste capacity,** but where land is not specifically safeguarded for waste.	A proposed amendment to para 8.20 provides clarity to the identification of 'Priority Areas' which is therefore not required here. No change proposed.
MM45	8.2 Restructured	Pinkham Way Alliance	"North London Boroughs assessed a range of sites …" a) It might have been more accurate to retain the reference to identification of sites rather assessed sites • A summary look at the basis of the "assessment criteria" mentioned in the Sites and Areas Report (Jan 2019) shows that no consideration was given to policies in the NPPF which protect biodiversity, open space, brownfield sites with high environmental value. It is not mentioned once in the Report. The Report drew particular attention to the requirement in 041 PPG to "give priority to the re-use of previously developed land" but failed to mention the rest of that paragraph which states that "Not all brownfield sites will be	No response. This is not accepted to be a fair representation of the assessment process and repeats matters which have been raised previously and are already being considered by the Inspector.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			suitable for the range of waste management facilities required to support the Local Plan and some may be of high environmental value…" b) It would be more accurate to leave in the reference to "only one site was brought forward by landowners if that was the fact. Artificially upgrading the Pinkham Way site into an Area seems meaningless. It is not an area like the other areas in the Plan - industrial areas with buildings and hardstanding on different parts of them. There are no buildings or different areas on Pinkham Way, it is one large open green site mainly covered in woodland.	
MM45	8.2	Fitzgerald & Burke Builders Merchants Limited	• Not consistent with national policy because no direct consultation has taken place with site owners in Oakleigh Road LSIS. • Concerned that the NLWP has allocated Fitzgerald & Burke Builders Merchants for waste uses.	• Site owners in SIL and LSIS were not individually consulted because no change is proposed to the status of their sites nor to the SIL/LSIS designation, nor to the types of uses allowed in the SIL/LSIS. • Fitzgerald & Burke Builders Merchants site is not allocated for waste use. • Oakleigh Road LSIS as a whole is identified as a Priority Area for waste uses.
MM46	8.20	Pinkham Way Alliance	"Waste facilities are considered industrial uses suitable for development on any industrial land in North London in line with policies **in NPPW and the London Plan** … which direct new facilities to industrial land" Again, no reference to policies in the NPPF although NPPW makes clear it should be read in	The site criteria were collated from the NPPF, NPPW, NPPG and the London Plan. **PROPOSED CHANGE**: When seeking suitable locations for new waste facilities, the Boroughs took into account NPPW

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			conjunction with NPPF. Difficult to see how Pinkham Way could be properly assessed for any use without taking account of the NPPF. This omission has been raised in all our submissions during the Plan preparation. (We now also know that there was no Options Appraisal for Sites and Areas document in place that recorded the basis on which sites were selected etc.) "The North London Boroughs have sought to take this approach a stage further and identify the most suitable land in North London … Priority Areas" • There is only one non-industrial site in the Plan that requires the Boroughs to look for an alternative approach to the clear policies in the NPPW and the London Plan that industrial land should be used for waste facilities and that is Pinkham Way.	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. ~~This is in line with policies in the NPPW and London Plan which direct new waste facilities towards industrial land.~~ However, in preparing the NLWP, the North London Boroughs have sought to refine ~~take~~ this approach ~~a stage further~~ and ~~identify~~ direct new waste facilities towards locations assessed and selected as the most suitable ~~land~~ in North London, ~~for a range of new waste facilities~~: which are identified as "Priority Areas" in the Plan. The ~~proposed search~~ criteria used in the NLWP site and area selection process were developed based on the requirements of the National Planning Policy Framework, National Planning Policy for Waste [footnote], Planning Practice Guidance and the London Plan ~~national waste planning policy~~. Both planning and spatial criteria were discussed with key stakeholders through a focus group session in spring 2014 . [footnote] Following the introduction of the National Planning Policy for Waste NPPW in October 2014 to

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				replace Planning Policy Statement ~~PPS~~10, the site and area search criteria were reviewed to ensure compliance with this document.
MM46	8.20	North London Waste Authority (NLWA)	The new text that states waste facilities are considered suitable on industrial land is not consistent with national planning policy. If the modification remains in the Plan there is then an inconsistency between the inclusion of Pinkham Way and the stated policy that waste sites should be on industrial land.	**PROPOSED CHANGE**: 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. ~~This is in line with policies in the NPPW and London Plan which direct new waste facilities towards industrial land.~~ However, in preparing the NLWP, the North London Boroughs have sought to refine ~~take~~ this approach ~~a stage further~~ and ~~identify~~ direct new waste facilities towards locations assessed and selected as the most suitable ~~land~~ in North London, ~~for a range of new waste facilities~~: which are identified as "Priority Areas" in the Plan. The ~~proposed search~~ criteria used in the NLWP site and area selection process were developed based on the requirements of the National Planning Policy Framework, National Planning Policy for Waste [footnote], Planning Practice Guidance and

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				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.
MM47	8.21 and 8.21 x	Pinkham Way Alliance	This relates to the way in which the site and area selection process has been undertaken – see also comments at MM50 and MM51 If this MM were to be agreed, it would have the effect of retrospectively creating supporting evidence for the sites and areas selection process where none existed. We respectfully request the Inspector not to permit it. The original NLWP para 8.25 (now substantially rewritten) stated … "Further details are set out in Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP (2018 printed. " No such document was ever published. The introduction to "Options Appraisal for Sites and Areas" document received as part of this consultation explains that a draft Sites and Areas Options Appraisal was prepared to support the Proposed Submission NLWP in 2019 but was not published.	This is an inaccurate reporting of the email exchange between the Programme Manager and PWA. The Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP should have been published alongside the Proposed Submission Plan (as evidenced by its reference in the NLWP para 8.25) but it was not. This was an error. This intention is clear as the NLWP references the document in 8.25 of the Proposed Submission NLWP. Any document which is published must be formally signed off first by the Boroughs. The document was never formally signed off (or "agreed" in Council parlance) by the Boroughs and therefore remains as a draft. The contents and approach were not in dispute because they were incorporated into the NLWP. The "update" to this document simply refers to the inclusion of the updated information in the Data Study Addendum. There has been no retrofitting.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			The second paragraph doesn't make sense. The last paragraph states that "This Sites and Areas Options Appraisal has therefore been updated to reflect the new information and data since the public hearings" This doesn't make sense either. On receipt of the consultation documents we requested a copy of the draft Options Appraisal and were informed by the Manager of the NLWP project that we could not have it as it had not been finalised and could not be published "because the Boroughs were unable to agree on its contents" We respectfully request that the Inspector gives no weight to the consultation document Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP document as evidence for any content in the NLWP prior to these MMs and little if any weight to it as evidence to support the MMs made to the selection of sites and areas set out in the MMs. We have noted and commented on the contents of the current document circulated with this consultation but, we have no way of knowing what was in the original so we are unable to judge it as an updating document it claims to be.	
MM50	8.25 restructured and split	Pinkham Way Alliance	If this MM were to be agreed, it would have the effect of retrospectively creating supporting evidence for the sites and areas selection process where none existed.	Response as per MM47.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			We respectfully request the Inspector not to permit it. See comments at MM 47 above	
MM51	New after 8.25	Pinkham Way Alliance	"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." In the light of comments made elsewhere, this section is suggested to be amended to read: "~~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~~ have been specifically identified, however 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." In line with the NPPW, this change continues to ensure the identification of sufficient	The Boroughs consider the text helpful for context. No change proposed.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			opportunities to meet all the evidenced needs of the sub region.	
MM51	New after 8.25	Pinkham Way Alliance	In the light of comments made elsewhere, this section should read: "The work set out in the Options Appraisal for Sites and Areas **document produced for this consultation** 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	The Boroughs consider the new paragraphs helpful for context. The Boroughs do not consider changes to the text necessary. No change proposed.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			meet North London's needs will be monitored rather than land take."	
MM52	8.26	Fitzgerald & Burke Builders Merchants Limited	• Development should be directed to existing waste sites in the first instance, followed by looking at new sites in other boroughs other than Barnet and Enfield. • Question whether the level of engagement with existing operators was extensive enough to identify opportunities for expansion and intensification.	Existing operators were consulted on their intentions to intensify or upgrade their facilities and this was incorporated in to the NLWP. Operators have also been consulted at each stage of the NLWP development. The North London Boroughs cannot force operators to intensify or upgrade their facilities, however intensification of existing sites is encouraged through Policy 1.
MM52 and MM53	8.23 -26	Pinkham Way Alliance	The construct of Priority Areas appears to have been introduced to deal with the inclusion of Pinkham Way, an awkward non-industrial, non-policy compliant, site in the Plan It does not "improve clarity on the sequential approach" given that amended Policy 2 now introduces a third layer to the sequential approach by unequally ranking what are otherwise supposedly equally ranked suitable sites.14 It is not sound planning to protect suitable Enfield sites (Policy 3) from development at the expense of exposing a nature conservation site to harm. The Boroughs need to push the proper policy approach "a stage further and identify the best land …." is in reality a need to identify not the best land but the least suitable land in the Plan and call it a 'high performing' or Priority Area. Only the Pinkham Way site requires the 'proper policy approach' to be pushed … all the other sites	The adding of the word 'Priority' to 'Areas' is in response to discussion at the public hearings around the term used to describe the 'Areas' in Schedules 2 and 3. The use of 'Areas' was considered to be confusing by some of the participants. The Boroughs consider that the term 'Priority Areas' helps to better define their role in delivering new waste capacity. The Boroughs have demonstrated why the inclusion of Pinkham Way as a Priority Area is sound.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			are compliant with the proper policy approach. We remind the Inspector that the Boroughs admit "the Plan does not provide a robust rationale that clearly demonstrates why all of the proposed new waste areas are necessary." 15 We have seen no justification for keeping Pinkham Way in the Plan and this change clarifies nothing except the determination of the Boroughs to keep an unsuitable site in the Plan.	
MM54	7.2	Pinkham Way Alliance	"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." For clarity, boroughs should explain this section in comparison with their proposal to build a single-site EFW facility, which is not centred on the sub region, nor we anticipate on the weighted centre of its (LACW) waste generation, and more specifically is being planned to manage imported waste to the sub region. While the DCO is not being contested here, the approach being followed is in direct contradiction to the plan's otherwise stated intent. World leading scale economies are available at 400,000tpa, as promoted at a recently proposed EfW in Hampshire, which at such a lower level would help mitigate the import requirement, and hence benefit waste movements and potentially NSS aim.	No response. The NLWP reflects the NLWA's strategy for managing North London's LACW arisings. This is a matter that could have been part of the earlier representations or hearings on the submitted plan.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			We note that while there are references throughout to managing close to source, the plan is bereft of any evidence of actual waste source location. It is unclear how specific objectives and spatial principles can be met without such basic, core information, being evidenced.	
MM56	7.8	Pinkham Way Alliance	"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 MM may be correct but the NLWP actually follows an alternate route and separates out LACW and C&I when assessing existing capacity and planning for additional capacity (eg Table 3.2 Revised NLWP Table 8). The plan says one thing but goes on to undertake precisely the opposite. We would suggest the plan should follow the general direction of the MM as the more appropriate course of action.	Waste arisings projections for LACW and C&I use different methodologies and are therefore calculated separately from each other. The two waste streams are presented separately in Table 8 because Table 8 will be used as baseline data to monitor waste arisings which are calculated using different methodologies. Table 3, which sets out existing capacity, groups LACW and C&I together, as does Table 6 which identifies capacity gaps throughout the plan period. Monitoring of capacity will group the two waste streams together. No changes proposed.
MM57	New after 7.8	Pinkham Way Alliance	The MM should be removed. Comments have been made elsewhere regarding the LACW / C&I apparent gap, as well as corrections concerning the Edmonton EfW and composting facility.	This paragraph is correct. No changes proposed.
MM58	7.9	Pinkham Way Alliance	There is no consistency of the proposed MM and targets quoted elsewhere in the plan. We are unable to conclude which the boroughs intend to	The NLWA intend to renew the Joint Waste Strategy when the Government has set out clearly its national plans so the Strategy can reflect any fresh

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			follow / target, but note the 50% LACW recycling target by 2020 does not match the 50% target by 2025 quoted elsewhere, or the 44% maximum recycling target taken as the core plan scenario. The MM indicates that the (JWS) 50% target may be aligned with the equivalent Mayor's targets. NLWP Table 2 would indicate that main decision has already been taken. We have pointed out the need to clarify the position of the JWS in connection with the NLWP. Rather than adjusting the MM, the systemic nature of such confusion over actual targets suggests a more radical overhaul of the approach be taken and a final agreement should then flow consistently throughout the plan. The linked commentary in the Sustainability Appraisal to this MM is uncertain regarding the future of a new JWS. We do not know how or if the existing JWS 50% target will be revised but a commitment was given at the EIP that a fresh JWS would be finalised once HMG's requirements for the post Brexit landscape were made clear. With ever growing climate crisis awareness, even since the recent EIP, we would not expect this direction to prove other than providing a further dampener on overall waste levels.	responsibilities or new legislative/funding arrangements. The Government has delayed progress on this and although an Environment Bill was announced in 2018, it has made little progress. The Government recently announced that the Environment Bill will not be completed in the current Parliamentary Session. Therefore the NLWA's expectation is that the new Joint Waste Strategy will be being developed in 2021 and 2022 with approval in around 2 years' time. **PROPOSED CHANGE**: 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

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				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. ~~The Authority and partner boroughs will continue to seek to maximise recycling levels for LACW. The North London Joint Waste Strategy, and this target, may be revised to bring it in line with the targets in the Mayor's Environment Strategy of 50% LACW recycling by 2025, 50% household waste recycling by 2030 and 65% municipal waste recycling by 2030.~~
MM58	7.9	Extinction Rebellion Zero Waste	Information related to the North London Joint Waste Strategy is out of date.	The NLWA intend to renew the Joint Waste Strategy when the Government has set out clearly its national plans so the Strategy can reflect any fresh responsibilities or new legislative/funding arrangements. The Government has delayed progress on this and although an Environment Bill was announced in 2018, it has made little progress. The Government recently announced that the Environment Bill will not be completed in the current Parliamentary Session. Therefore the NLWA's expectation is that the new Joint Waste Strategy will be being developed in 2021 and 2022 with approval in around 2 years' time.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				PROPOSED CHANGE: 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. ~~The Authority and partner boroughs will continue to seek to~~

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				~~maximise recycling levels for LACW. The North London Joint Waste Strategy, and this target, may be revised to bring it in line with the targets in the Mayor's Environment Strategy of 50% LACW recycling by 2025, 50% household waste recycling by 2030 and 65% municipal waste recycling by 2030.~~
MM59	7.10	Pinkham Way Alliance	The comments made under MM56 apply equally here. They are therefore not repeated suffice to say the proposed MM does not align with the approach taken in the plan.	See response to MM56.
MM60	New after 7.11	Pinkham Way Alliance	The plan's derivation lays out great detail in identifying sites and then within those individual sites the categories of waste management facility deemed suitable. This partial summary of that process captured in a MM does not bring clarity as suggested; Table 7 Schedule 2 for instance is both clear(er) and substantially more comprehensive than the suggested MM. The MM should be removed.	The paragraph sets out which Priority Areas are suitable for recycling and composting facilities for LACW/C&I waste, and reference is made to Schedules 2 and 3. No proposed change.
MM60	New after 7.11	Pinkham Way Alliance	"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**." • Who owns the site is not relevant. But for the record, the site is partly owned by the NLWA and partly by Barnet Council • The NLWA has made it plain on many occasions, the most recent being at the November hearing	The deliverability of the plan is one of the tests of soundness and therefore ownership of the site is a consideration. The word "opportunity" is deliberate. It refers to the NPPW para 3 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."

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			last year that it had no plans to develop this site for the foreseeable future • In its response to a call for sites by Haringey Council in 2014 Barnet Council stated that it did not propose to use the site for waste facilities. Subsequently Barnet Council has had discussions with Haringey planning officers about a potential housing development on their part of the site • Substantial changes have been made to the site profile of A22-HR (MM113) and there is no indication in MM60 that those have been taken into account when the **opportunity** to bring the site forward was being assessed.	The position of the NLWA in relation to the future of the site has been addressed in the Examination.
MM60	new after 7.11	Extinction Rebellion Zero Waste	We note with great concern that increasing recycling and composting facilities is discussed here in relation to 'opportunities' rather than clear commitments. We strongly oppose the inclusion of the Friern Barnet Pinkham Way site in this plan	The NLWP is prepared by the North London Boroughs under their responsibilities as waste planning authorities. As a land-use plan, the NLWP is required to "identify sufficient opportunities to meet the identified needs of their area for the management of waste streams" (National Planning Policy for Waste para 3). As waste planning authorities, the North London Boroughs cannot build their own facilities. The NLWP reflects the plans of the NLWA to provide facilities to manage LACW and the NLWP relies on the market to deliver capacity to manage the other waste streams within the context of the Waste Hierarchy. The Pinkham Way site provides one such opportunity because the site is owned by the NLWA and has been assessed as being suitable to accommodate waste management facilities whilst respecting its

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				constraints. Pinkham Way was submitted by the NLWA as part of the NLWP 'call for sites' exercise. The area was assessed as part of the NLWP site assessment procedure and found to be suitable, in principle, for waste facilities and this is why it has been included in the NLWP. Further information is set out in the Sites and Areas Report.
MM61	New after 7.14	Pinkham Way Alliance	Comments made under MM60 are pertinent here also.	See response to MM60.
MM61	New after 7.14	Extinction Rebellion Zero Waste	Please could this be spelled out – at least to explain what are the opportunities, what does it mean to have 'recovery' capacity 'brought forward' and what are the three Priority Areas? How does this relate to Table 7 and Table 9 of Schedule 2? These identify two sites, Oakleigh Road and Eley's Estate, in relation to 'Integrated resource recovery facilities / resource parks'.	As a land-use plan, the NLWP is required to "identify sufficient opportunities to meet the identified needs of their area for the management of waste streams" (National Planning Policy for Waste para 3). "Opportunity" refers to the identification of suitable areas of land in the NLWP which will allow a waste operator to locate a waste facility on a site in one of those areas of land. "Recovery capacity" means those types of technologies identified in the 'recovery' tier of the waste hierarchy. These include anaerobic digestion, incineration with energy recovery, gasification and pyrolysis which produce energy (fuels, heat and power) and materials from waste. "Brought forward" means taking a development proposal for a waste facility through the planning

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				process to be built and operational. The three Priority Areas suitable for recovery capacity are identified in column D in Schedules 2 and 3 under Policy 2. They are Eley's Estate, Brantwood Road and North East Tottenham. **PROPOSED CHANGE**: Amend Table 9: Key to Waste Management Facility Type to include 'recovery' in the description of type D.
MM62	New after 7.15	Pinkham Way Alliance	Comments made under MM60 are pertinent here also.	See response to MM60.
MM66	7.26	Pinkham Way Alliance	"The amount of hazardous waste managed in North London varies from year to year with a maximum capacity of around 4,250 tonnes over the last five years." Earlier submissions have highlighted the variability of hazardous waste levels, including the 246,062t deposited in North London's waste sites in 201616 versus the 10,352t exported in the same year17, a near twenty-five fold difference. Reconciliation of base data reveals a different picture to that being presented. Waste Data Addendum 4.6 concludes a North London capacity of 4,250 tpa. We note this small capacity versus the near 250,000t processing implied in earlier documentation (2016 net imports less exports above) and we also note: • Site ID ENF25 (Environcom) Data Study Addendum October 2020 Appendix B identifies	Waste 'management' capacity excludes waste transfer capacity (see paragraph 9.8.4 of the London Plan). The balance of exports and imports of hazardous waste is not equivalent to capacity. The methodology for calculating hazardous waste capacity is set out in the Data Study Addendum (4.5-4.6) and is considered sound.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			hazardous waste capacity of 11,400tpa • Site ID ENF35 (Redcorn) Data Study Addendum October 2020 Appendix B identifies hazardous waste capacity of 6,557 tpa. • Site ID ENF 4 (Chase Farm) Data Study Addendum 2020 Appendix B identifies hazardous waste capacity of 2,396 tpa Additionally, the exclusion of Powerday (see MM33 – current site ID ENF25, changed from ENF26 in 2019) has the consequence of excluding any contribution it makes to hazardous waste capacity. A change to this MM should certainly reflect the evidenced capacity position. Implications would then flow through to a fresh land capacity requirement. More significantly we note the current exclusion of the previously identified hazardous waste capacity at site ID35 in WDS 3 2019 Table 8 and Appendix 2 and Appendix 4 Site Profiles. A total of 64,132t of hazardous throughput (vs a licensed capacity of 75,000t) has been simply recategorised between the 2019 and current submissions. The effect of re-including this capacity, into its previous category, adequately provides for the plans otherwise identified capacity shortfall in hazardous waste. Data Study Addendum October 2020 4.5 and also WDS 2019 3.31 refer to mixed site use, specifically	

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			to include hazardous waste in the case of the former. More particularly NLWP January 2019 7.25 is specific on the matter on sites permitted to include a "certain amount of hazardous waste". No recognition of this (unknown scale) capacity is made in any calculation, but the scale of the 2016 data quoted (above) suggests the scale could be considerable. Despite a constant hazardous waste base assumption, the land requirements for exactly the same waste stream over the previous four NLWP formal submissions have been:- • Nil • Nil • 2h • 4.9h Over the period it has moved from being not relevant to apparently requiring over three quarters of all fresh land. Net surplus capacity, before exports and imports is 1.5m tpa (based on 2019 submission capacity assumption), or 0.6m tpa (based on 2020 submission capacity assumption). Even in the extreme of seeking coverage of all identified hazardous waste, that capacity gap is no more than 0.05m tpa, no more than a data-error scale element of the total capacity headroom available. (3% of the total available). In either case – 2019 as presented, or 2020 then with fresh land / capacity available from the	

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			capacity-excluded waste transfer stations – the available opportunity is 1.5m tpa. That appears more than adequate to balance against an apparent shortfall of up to 0.05m tpa not least in an area where national and pan-regional specialisms exist and are apparently not planned to be usurped within North London. Outside of specifically stating North London seeks to become a centre for hazardous waste management and making that case in a NLWP, the weight of evidence from several directions is that a call for fresh land is not justified.	
MM67	7.27	Pinkham Way Alliance	Noting comments in this submission, which together conclude there is no identified land need based on the approach followed and / or accurate capacity listing for sites, the MM is suggested to be modified as below. "~~There is a capacity gap for the recovery management of around 49,000 2,500tonnes 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 4.92ha of land.~~ The North London Boroughs support the provision of ~~such~~ facilities **for hazardous waste** 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	The Boroughs do not consider that this proposed change adds clarity. No change proposed.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			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.	
MM68	Policy 1	Henry Boot Developments	• Policy 1 incorrectly and unnecessarily requires Applicants to calculate the potential capacity of vacant sites, to ensure that equivalent provision is provided elsewhere; • Policy 1 is overly prescriptive as to the way in which alternative waste capacity needs to be secured prior to planning permission being granted;	Policy 1 is in line with London Plan policy SI9.
MM72	9.8	Pinkham Way Alliance	An addition is suggested to avoid any timing issues: "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 (NSS clarification required, see several other references) **over the remaining period of the NLWP or five years hence whichever is the greater**"	Compensatory capacity needs to be provided before a site can be released for other uses. This is generally achieved through a s106 obligation (see 9.7). It is not clear why a reference to timing has been suggested here. No change proposed.
MM72	9.8	Pinkham Way Alliance	An addition is suggested to ensure the ongoing robustness of the wider planning system.	The proposed addition does not add clarity and is not in line with the London Plan.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			"If sufficient capacity has been achieved in North London, compensatory capacity should be provided elsewhere in London. If it can be demonstrated that there is sufficient capacity in London to meet London's apportionment and net self-sufficiency targets, it may be possible to justify the release of waste sites for other uses. **In either case, permanent, balancing, apportionment and other adjustments should be agreed and implemented.**	No change proposed.
MM72	9.8	Pinkham Way Alliance	While this section is focused on the scenario of a capacity surplus in North London, it will be the case that other London WDA's may find themselves in such a position and potentially at a time when North London registers a capacity shortfall. The reverse situation may therefore also apply. The plan should be explicit in showing that as one option available to close any capacity gap. This approach would be in line with the addition to draft London Plan 9.8.6. There is no evidence the approach has or will be considered as a part of the NLWP.	The London Plan requirement for "Boroughs with a surplus of waste sites to offer to share these sites with those boroughs facing a shortfall in capacity before considering site release" is reflected in the sentence at 9.8 "If it can be demonstrated that there is sufficient capacity in London to meet London's apportionment and net self-sufficiency targets, it may be possible to justify the release of waste sites for other uses" which reflects London Plan para 9.9.3. No change proposed.
MM72	9.8	Pinkham Way Alliance	"During the Plan period, where waste sites shown in Schedule 1 are lost, but compensatory provision has been made and can be identified, this will be noted in the NLWP AMR" Since compensatory capacity must be identified prior to the loss of a site, this section is suggested to instead read: "During the Plan period, where waste sites shown	**PROPOSED CHANGE**: 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 ~~has been made and can be identified, this~~ will be noted in the NLWP AMR.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			in Schedule 1 are lost, the compensatory provision will be noted in the NLWP AMR" An equivalent position applies to MM73.	
MM72	9.8	Pinkham Way Alliance	The MM includes a reference to the tracking via the NLWP Monitoring report. It is suggested that a form of this report is included in the NLWP which also highlights the base case start point in its presentation.	The AMR has not yet been prepared. Table 14 makes clear which NLWP Tables are the base point for monitoring purposes. No change proposed.
MM73	9.9	Pinkham Way Alliance	"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." Since compensatory capacity must be identified prior to the loss of a site, this section is suggested to instead read: "**Where existing waste sites are lost, compensatory provision made to the satisfaction of the Boroughs, will be noted in the AMR**."	The Boroughs do not consider the proposed change adds any further clarity. No change proposed.
MM75	New after 9.10	Extinction Rebellion Zero Waste	Could all evidence of adverse impact, or even possible adverse impact, be made available and summarised in the Plan? Could the Plan also state that the boroughs will declare and publicise any enforcement action?	Any enforcement action on waste sites in North London will be made available in the NLWP annual monitoring report. This paragraph will be expanded to include further details of what enforcement entails (see MM75 below).
MM75	New after 9.10	Dump Donoghue	• Additional explanation needed on adverse impacts in para 9.10 (new). • Further information needed on the roles of the EA and Barnet in enforcement. • Further information needed on how often	**PROPOSED CHANGE**: Some existing waste sites may be having an adverse impact on surrounding uses such as schools and residential areas. ~~Both the Boroughs and the~~

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			monitoring of existing sites will take place.	~~Environment Agency have a role in ensuring that conditions of the environmental permit and planning permission are not breached.~~ 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

[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.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				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.
MM76	Policy 2	Fitzgerald & Burke Builders Merchants Limited	Priority Areas in Enfield and Barnet should not be included in the NLWP because they do not represent a geographical spread.	Priority Areas are amongst the most suitable land across North London for new waste facilities. Those identified in Barnet and Ealing have been assessed as

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				being suitable.
MM76	Policy 2	Henry Boot Developments	Clarification is sought as to whether the sequential approach to relocation, highlighted within Policy 2, applies to waste facilities currently located within Enfield, that would like to relocate to alternative locations within the Borough.	If the current site is to be released for other uses then "compensatory provision should be delivered in accordance with the spatial framework principles 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" (NLWP para 9.8). This includes the sequential approach set out in Policy 2 and a change is proposed to para 9.11 to ensure clarity on this point: PROPOSED CHANGE to 9.11: […]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

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				need in Enfield and Barnet to improve the coverage across North London (see Policy 4). […]
MM77	Schedules 2 and 3	Pinkham Way Alliance	As a result of the revised approach there is minimal choice for potential waste facility types B and D and no available choice for waste type facility C. The approach taken by the plan may have yielded a sub optimal or at least highly restrictive outcome with little room for manoeuvre as future circumstances and demands may require. We contrast this result with MM82, "The ability of Priority Areas to accommodate a range of types and sizes of waste management facility is important to the flexibility of the Waste Plan."	Schedules 2 and 3 provide locations for all types of facility presented in Table 9.
MM77	Schedule 2	Pinkham Way Alliance	Site A22-HR (Pinkham Way) should be removed from Schedule 2. See comments at MM 60 and MM78.	No response. This repeats matters which have been raised previously and are already being considered by the Inspector.
MM77	Schedules 2 and 3	TfL Commercial Development TfL Spatial Planning	LLDC3-WF Temple Mills Lane LSIS should not be included because it is a safeguarded bus depot.	The Boroughs are fully aware that Area LLDC3-WF – Temple Mills Lane is a functioning bus depot. This is mentioned in the description of the area in the Area Profile in Appendix 2 of the Plan. In identifying the area as potentially suitable for waste management, the boroughs also noted that the area is designated as LSIS and that should the bus depot use come to an end, then it is potentially suitable to be considered for waste use. The Boroughs are also aware that it is in Opportunity Area and a Housing Zone and that it lies within the area under the planning control of the London Legacy Development Corporation. The LLDC Local Plan

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				confirms its designation as LSIS. Temple Mills Lane is one of the areas contained in the Memorandum of Understanding between LLDC and the North London Boroughs. Para 8.17 sets out the Boroughs approach to waste development in OA and HZ. Policy 2 states that any waste development in schedule 2 and 3 areas need also to be in line with policies in the London Plan and Local Plans. Policy 3 Windfall sites deals with development in OA, and the opportunities for mixed use and co-location. As the area is LSIS and not SIL, co-location and mixed development would be appropriate in this area under the London Plan. The Boroughs consider that the identification of this area as potentially suitable for waste facility is an appropriately flexible approach to meeting the concerns of TfL Commercial Development.
MM77	Schedules 2 and 3	TfL Spatial Planning	A03-BA Brunswick Industrial Park is located in a residential area with restricted access to the Strategic Road Network and suitable mitigation is required to address the issues of access.	The Area Profile notes the Area's proximity to residential properties and notes that traffic impact assessment will be a key mitigation measure.
MM77	Schedule 2	Mr Welby	Mill Hill Industrial Estate no longer exists because flats have been built on it.	Mill Hill Industrial Estate is still in existence and safeguarded as a "Locally Significant Industrial Site" in Barnet's Local Plan.
MM78	9.11 rearranged	Pinkham Way Alliance	"**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**	No response. The Boroughs do not accept that this is a fair view of the assessment of Priority Areas and it repeats matters which have been raised previously and are already being considered by the Inspector.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			facilities in North London." We have seen little evidence that all relevant policies and advice has been applied to Pinkham Way site/area. See Section 1 of our submission MM5 Q63. We believe this site was assessed as if it was an industrial site with no reference to NPPF or relevant policies for its status as a SINC and as a brownfield site with high environmental value.	
MM78	9.11	Fitzgerald & Burke Builders Merchants Limited	Fitzgerald & Burke Builders Merchants site is near to sensitive uses and should not be allocated for waste safeguarding.	Fitzgerald & Burke Builders Merchants site is not allocated or safeguarded for waste use. Any site which comes forward for waste uses within the Oakleigh Road LSIS will be assessed against the criteria in the NLWP, Barnet's Local Plan, the London Plan and national policy.
MM83	Policy 3	Pinkham Way Alliance	new addition after (a) This MM should be removed as it is contrary to the London Plan and out of step with the Mayor's letter to the NLWP identifying Enfield as the 'go to' borough for industrial development in London.	The new criterion is not contrary to the London Plan. The Mayor has not identified Enfield as the 'go to' borough for industrial development in London. It is assumed that this is a misunderstanding of the Mayor's statement that "Enfield is identified as a 'provide capacity' borough for the borough-level management of industrial floorspace capacity as set out in the Draft New London Plan in Table 6.2". Boroughs in the 'Provide Capacity' category are those where strategic demand for industrial, logistics and related uses is anticipated to be the strongest. The categories set out in London Plan Table 6.2 were referenced in the NLWP in paragraph 4.11, however

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				Table 6.2 has since been deleted from the London Plan and therefore the reference will also be deleted from the NLWP. **PROPOSED CHANGE** to 4.11: ~~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.~~
MM83	Policy 3	Pinkham Way Alliance	In addition to adding to a better geographical spread (Spatial Principle B) the MM now also suggests the policy will add to co-location (Spatial Principle C). If co-location occurs on or adjacent to an existing site then it appears implausible that a better spread has been achieved, rather it would suggest a hardening of the existing spread. The alternate is that a windfall site is being proposed for more than one waste management process type, which is possible, but appears to be a scenario of sufficient low expectation that the inclusion of "and C" appears unwarranted, certainly unnecessary. We note the commentary in the Sustainability Appraisal Addendum to this MM indicates that the changes will result in less waste movements and less waste related travel. We say again that	The London Plan encourages proposals which deliver a range of complementary waste management and secondary material processing facilities on a single site. Para 9.23 (MM84) provides an example of co-location as "a recycling facility with a reprocessing plant" ie a manufacturing plant which will use the product supplied by the recycling facility. Locating the source material near the manufacturing process will reduce waste movements by negating the need for onward journeys to a reprocessing plant further away.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			there is no evidence presented at any stage of the NLWP process regarding waste movements or waste miles which would help support such an assumption.	
MM84	9.23	Pinkham Way Alliance	While we can understand a purist wish to include, "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", but have to question if such a requirement is feasible since any developer most likely has no link to the site(s) in question and may well be a commercial competitor to some or all of them. It may thus prove to be such a high bar that no developer is ever able to scale it, making this element undeliverable.	This is intended to ensure that existing waste sites are optimised, in line with London Plan policy SI8. Existing waste sites include those which are currently vacant.
MM84	9.23	Fitzgerald & Burke Builders Merchants Limited	Oakleigh Road LSIS should not be included as a Priority Area because it is safeguarded to deliver part of the construction of Crossrail 2.	Part of Oakleigh Road LSIS is identified in the Crossrail 2 safeguarding directions and would have been released after the project was completed. However, Crossrail 2 plans are currently on hold and there is a good deal of uncertainty about the future of the project.
MM85	9.24	Pinkham Way Alliance	In a similar vein to commentary regarding the achievability of MM84, we point out the proposed requirement that, "developers will need (sic) demonstrate …. 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	This is intended to ensure that windfall sites go through the sites and areas assessment process set out in section 8 of the NLWP. **PROPOSED CHANGE**: […] developers will need to demonstrate [….]

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			existing waste sites in Enfield." To be able to meet this requirement developers will require guidelines on what would / will constitute a balanced geographical distribution. Again, it may thus prove to be such a high bar that no developer is ever able to scale it, making this element undeliverable.	
MM88	Policy 5	Extinction Rebellion Zero Waste	'...helps reduce greenhouse gas emissions' at point (i) is a very weak and unclear formulation. The reduction should be by comparison with the best alternative approach for minimising emissions. The proposed expansion of the Edmonton incineration facilities would breach Policy 5(i)	"Helps" in this context means 'contributes to'. This phrasing is in line with documents elsewhere and is an acknowledgment that greenhouse gas emissions come from a range of sources and require a range of measures. Paragraph 9.43 provides further details on how clause i) will be assessed. All development proposals will be assessed against London Plan policies SI2 and SI8 which require a reduction in greenhouse gas emissions and a change is proposed to 9.43 to capture this. The "Development Plan" includes the London Plan and Local Plans, including the NLWP. **PROPOSED CHANGE to 9.43**: Sustainable design, construction and operation of waste management development will be assessed against relevant ~~borough Local~~ Development Plan policies. The NLHPP was considered under the NSIP regime,

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				not local planning policies.
MM94	9.42	TfL Spatial Planning	It is disappointing that there has not been an explicit commitment to the specific requirements of TfL's Vision Zero Action Plan as requested.	**PROPOSED CHANGE to 9.42:** add the following text: 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. The aim of Vision Zero is to eliminate all deaths and serious injuries on London's transport system by 2041 and reduce road danger for everyone and create streets safe for walking and cycling. Further information on Direct Vision Standard and HGV Safety Permits is available on the TfL website.
MM95	9.44	Swift Conservation	The references to biodiversity are welcome, but the NLWP should require artificial nesting and roosting habitats as part of new development.	Any application for a new waste facility will be assessed against criteria in Barnet's Local Plan and the London Plan, including the requirement to provide artificial nesting and roosting habitats in new development. It is therefore not necessary to repeat this policy within the NLWP.
MM97	Policy 6	Extinction Rebellion Zero Waste	The carbon intensity floor referred to at paragraph 9.59 is set at a very undemanding level. We would urge deletion of 'or economically viable' which threatens to undermine this Policy.	The carbon intensity floor is in line with London Plan policy SI8 'Waste Capacity and Net Waste Self-Sufficiency' and SI3 'Energy Infrastructure'. The "economically viable" caveat in Policy 6 formed part of the Proposed Submission NLWP. Therefore this is a matter that should have been part of the earlier representations or hearings on the submitted plan. The caveat is in line with NPPF (153) which requires new development to "comply with any development plan policies on local requirements for

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				decentralised energy supply unless it can be demonstrated […] that this is not feasible or viable".
MM98	9.61	Extinction Rebellion Zero Waste	On what basis is heat from EfW facilities described as 'low carbon'? Clearly the facilities are major emitters of CO2. We suggest that this phrase be deleted.	This description is in line with the National Policy Statement for Renewable Energy Infrastructure (EN-3) which includes energy from waste facilities above 50 megawatts in the description of renewable energy infrastructure. EN-3 states "Electricity generation from renewable sources of energy is an important element in the Government's development of a low-carbon economy".
MM103	10.6 Table 14	Extinction Rebellion Zero Waste	We regard the 'Target(s)' as inappropriate since they are based on forecasts which are very disappointing. We are disappointed that there is no reference to collecting data against ambitious targets for reducing greenhouse gas emissions, protecting biodiversity (local and otherwise) and reducing air pollution eg. through the release of particulates. In relation to IN1, data should also be monitored on the types of waste (food waste, other compostable waste, plastics etc) and how they are managed in light of the implications for greenhouse gas emissions.	The NLWP is a planning document, which reflects national and regional targets, and will be monitored annually. The National Planning Policy for Waste sets out what waste planning authorities are expected to monitor and report as follows: • take-up in allocated sites and areas; • existing stock and changes in the stock of waste management facilities, and their capacity (including changes to capacity); waste arisings; and, • the amounts of waste recycled, recovered or going for disposal. The source material is publicly available data. The purpose of the AMR is to check that the NLWP's strategy for meeting its waste needs is progressing as expected. The NLWP AMR will monitor what is considered necessary to check on whether the intending policy

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				outcomes of the NLWP are being delivered and will not repeat any monitoring undertaken by other organisations like the government, the Mayor, Boroughs or the NLWA. Each borough may also monitor other aspects of policy such as air pollution and protection of biodiversity.
MM105a	Schedule 1	PALOMA II (INDUSTRIAL IV) TRUSTEE I LIMITED	We support the deletion of reference to 'Willoughby Lane' in relation to Site HAR7. HAR7 should be renamed in the Plan 'Redcorn Ltd, Brantwood Road'.	**PROPOSED CHANGE**: update HAR7 in Schedule 1 and Figure 5 Redcorn Ltd, Brantwood Road ~~/ Brantwood Auto Recycling Ltd~~
MM105a	Schedule 1	GBN	The deletion of WAF4 is correct and sound. The site, and waste capacity has been transferred to Gibbs Road (ENF 37).	Support welcomed.
MM105a	Schedule 1	Henry Boot Developments	• Vacant waste sites should not be included as existing waste sites. • There are a number of inaccuracies within Schedule 1.	• The London Plan requires all existing waste sites to be safeguarded for waste use. Waste sites are defined in the London Plan as "land with planning permission for a waste use or a permit from the Environment Agency for a waste use". • Schedule 1 is accurate as of 2016. Any subsequent changes will be picked up as part of the annual monitoring report.
MM105a	Schedule 1	Barnet Labour Group	Object to Oakleigh Road, Brunswick Industrial Park, Mill Hill Industrial Estate and Connaught Business Centre being included in the NLWP.	The NLWP does not allocate individual sites for new waste facilities but identifies 'Areas', for example industrial estates, within which a site suitable for a new waste facility could come forward. Oakleigh Road, Brunswick Industrial Park, Mill Hill Industrial

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				Estate and Connaught Business Centre are such 'Areas' and are all designated as a "Locally Significant Industrial Site" in Barnet's Local Plan. This means they are safeguarded for business and industrial uses only. Industrial uses include waste facilities. These areas were assessed as part of the site assessment process and found to be suitable for some types of new waste facilities (see NLWP Schedule 2). The assessment of these areas is set out in the Sites and Areas Report and the appended area proformas. Any application for a new waste facility within these industrial areas will be subject to a public consultation and assessed against criteria in the NLWP, Barnet's Local Plan, the London Plan and the National Planning Policy for Waste.
MM105a	Schedule 1	Seamus Reddin	Connaught Business Centre should not be included in the NLWP.	The NLWP does not allocate individual sites for new waste facilities but identifies 'Areas', for example industrial estates, within which a site suitable for a new waste facility could come forward. Connaught Business Centre is one such 'Area' and is designated as a "Locally Significant Industrial Site" in Barnet's Local Plan. This means it is safeguarded for business and industrial uses only. Industrial uses includes waste facilities. Connaught Business Centre was assessed as part of the site assessment process and found to be suitable for some types of new waste facilities (see NLWP

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				Schedule 2). The assessment of this areas is set out in the Sites and Areas Report and the appended area proformas. The Area profile is up to date and includes an analysis of flood risk and surrounding uses. Any application for a new waste facility within Connaught Business Centre will be subject to a public consultation and assessed against criteria in the NLWP, Barnet's Local Plan, the London Plan and the National Planning Policy for Waste.
MM105b	HAR 7	PALOMA II (INDUSTRIAL IV) TRUSTEE I LIMITED	We support the revision of HAR7 site boundary in Haringey's Policies Map. The site profile for HAR7 should also be updated.	**PROPOSED CHANGE**: update to HAR7 site map in the Appendix 4 Site Profiles.
MM109	Appendix 2: Hackney LLDC Area Profiles LLDC1-HC Bartrip Street	Environment Agency	• The wording within Area Profile that infers that because the development uses will be 'Less Vulnerable' and this is compatible with Flood Zones 2/3 that the Sequential Test is passed which is not the correct of the Sequential Test. • The wording within Area Profile doesn't make clear that potential increases in future flooding is due to climate change. • Additional wording should say that any site-specific FRA must use the latest climate change guidance.	It is agreed that the highlighted wording in the Area Profiles does not reflect the approach outlined in the October 2019 Flood Risk Sequential Test Report or NPPF and NPPG and should be updated to better reflect the approach taken. The clarification that increase in future flood risk is from Climate Change is a welcome addition. Amending the references to the climate change allowances to put emphasis on applicants using the current values at the time of their planning application, removes the risk of contradiction in the event that climate change guidance is updated. **PROPOSED CHANGES**: The site area is largely within Flood Zone 1 with the

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				southern most part falling partially within Flood Zones 2 and 3, noting that the Flood Zone 3 is within an area benefiting from defence. ~~The site area would be suitable for the proposed "Less Vulnerable" developments. It is therefore considered that the site area should pass the sequential test.~~ The 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. […] this will increase in ~~with~~ the future as a result of climate change […] A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current ~~following~~ climate change allowances at the time of submission. ~~into the assessment:~~ • ~~Use central (25% increase from 2070 to 2115) for peak river flow~~ • ~~Use central (20% increase from 2070 to 2115) and upper end (40% increase from 2070 to 2115) for peak rainfall intensity.~~

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
MM110	Appendix 2: Hackney LLDC Area Profiles LLDC2-HC Chapman Road (Palace Close)	Environment Agency	• The wording within Area Profile that doesn't make clear that potential increases in future flooding is due to climate change. • Additional wording should say that any site-specific FRA must use the latest climate change guidance.	It is agreed that the highlighted wording in the Area Profiles do not reflect the approach outlined in the October 2019 Flood Risk Sequential Test Report or NPPF and NPPG and should be updated to better reflect the approach taken. The clarification that increase in future flood risk is from Climate Change is welcome addition. Amending the references to the climate change allowances to put emphasis on applicants using the current values at time of their planning application removes the risk of contradiction in the event that climate change guidance is updated. **PROPOSED CHANGES**: 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 site area would be suitable for the proposed "Less Vulnerable" developments, h is therefore considered that the site area should pass the sequential test.~~ The exception test would not be applicable. […] this will increase in ~~with~~ the future as a result of

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				climate change […] A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current ~~following~~ climate change allowances at the time of submission. ~~into the assessment:~~ • ~~Use central (25% increase from 2070 to 2115) for peak river flow~~ • ~~Use central (20% increase from 2070 to 2115) and upper end (40% increase from 2070 to 2115) for peak rainfall intensity.~~
MM111	Appendix 2: Haringey Area Profiles A19-HR Brantwood Road	Environment Agency	• The wording within Area Profile that infers that because the development uses will be 'Less Vulnerable' and this is compatible with Flood Zones 2/3 that the Sequential Test is passed which is not the correct of the Sequential Test. • The wording within Area Profile that doesn't make clear that potential increases in future flooding is due to climate change. • Additional wording should say that any site-specific FRA must use the latest climate change guidance.	It is agreed that the highlighted wording in the Area Profiles do not reflect the approach outlined in the October 2019 Flood Risk Sequential Test Report or NPPF and NPPG and should be updated to better reflect the approach taken. The clarification that increase in future flood risk is from Climate Change is welcome addition. Amending the references to the climate change allowances to put emphasis on applicants using the current values at time of their planning application removes the risk of contradiction in the event that climate change guidance is updated. **PROPOSED CHANGES**: The site area is largely Flood Zone 1 with the western

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				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 site area is considered suitable for the proposed "Less Vulnerable" developments. It is therefore considered that the site area should pass the sequential test. The exception test would not be applicable. Note that the site area may also be suitable for "More Vulnerable" developments, as this would pass the sequential test.~~ The exception test would not be applicable. […] this will increase in ~~with~~ the future as a result of climate change […] A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current ~~following~~ climate change allowances at the time of submission. ~~into the assessment:~~ • ~~Use central (25% increase from 2070 to 2115) for peak river flow~~ • ~~Use central (20% increase from 2070 to 2115) and upper end (40% increase from 2070 to 2115) for peak rainfall intensity.~~

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
MM113	Appendix 2 Haringey Area Profiles A22-HR Pinkham Way	Pinkham Way Alliance	The justification given for the amendments to the Pinkham Way site Profile is **"to ensure the plan is consistent with national policy and address community concerns about the loss of biodiversity and flood risk"** The amendments do not achieve either of these objectives.	No response. The Boroughs have demonstrated that the plan is consistent with national policy and this repeats matters which have been raised previously and are already being considered by the Inspector.
MM113	Appendix 2 Haringey Area Profiles A22-HR Pinkham Way	Pinkham Way Alliance	Relevant Local Plan Policy There remains confusion about the name, size and planning status of the site • 'Friern Barnet ~~site~~ Area – • Proposal 5 no longer exists • The Pinkham Way site is not 'allocated' it is designated SINC. An attempt to allocate it in the Site Allocations DMP in 2016 failed when it was thrown out of the SA by the Inspector at the EiP who recommended the Employment designation be reviewed in line with NPPF as it had been in place a long time, was not required to contribute to Haringey's employment needs and the site was contributing to nature conservation	**PROPOSED CHANGE:** 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~~

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				~~Biodiversity.~~ ~~Friern Barnet is allocated as Borough Grade 1 SINC, and for employment uses in the Local Plan.~~
MM113	Appendix 2 Haringey Area Profiles A22-HR Pinkham Way	Pinkham Way Alliance	Flood Risk We draw the Inspector's attention to Mr Chris Faulkner's submission on behalf of the Freehold Community Association. PWA has the following additional comments relating to errors in MM113 and the SA Addendum. SA Addendum p 80, commentary (shaded green) para 1 states: Updated flood mapping shows that a portion of the northern part of the area now falls within Flood Zone 3 Over several consultations the boroughs have chosen to ignore evidence-based advice from both the EA and PWA relating to errors in identifying correct flood zones, and have routinely blinded themselves to the fact that FZ 3 extends on to the site. Whilst the map is up to date (the EA produced it for Barnet Council in August 2018, and PWA submitted it as Appendix 12 to its response to the Inspector's Question 63), it does not alter known local flood zone data in any way, and is thus not 'updated'. The final para of SA Addendum p 81 states: 'a small area to the north of the site falling partially within Flood Zones 2 and 3'. This statement is inaccurate. As the map shows, the FZ 2 / 3 area fills a significant part of the	The flood mapping that is presented in the Schedule of Proposed Modifications (which is also referenced within the Sustainability Appraisal Addendum and HRA Addendum), the Flood Risk Addendum, and the NLWP Flood Risk Sequential Test report is based on work undertaken in 2018. This is referred to as 'updated' within p80 of the Sustainability Appraisal Addendum. Updated in this context is intended to reflect that the mapping in the report has been updated from previous mapping assessed in previous versions of the Sustainability Appraisal, and not that new hydraulic mapping has been undertaken at this time. The Sustainability Appraisal Addendum has taken into account the correct Flood Zone information. A22-HR Pinkham Way Area Profile refers to 'a small area' of the Friern Barnet Sewage Works/Pinkham Way area as falling within Flood Zones 2 and 3a. The respondent takes issue with the use of the word 'small' and suggest that 'significant' would be more appropriate and points to a reference from the Savills 2018 Site valuation report that refers to proportion of the area within Flood Zone 2 and 3 as 'large'. However, this is not considered material to the matter raised. From review it is observed that of the 5.95ha area, approximately 4.54ha (76.3%) is shown to be

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			NLWA portion. Savills 2018 site valuation for NLWA routinely describes the FZ 2 / 3 area as 'large'. The penultimate para of SA Addendum p 87 omits part of the reality of the flood risk on the site: 'As parts of the area are at a medium risk of flooding …' As the boroughs know, 'Medium Risk' refers to FZ 2. They have omitted mention of FZ 3 which has 'high probability'. As we explain above, the EA map in Appendix 12 noted above was produced for Barnet Council in August 2018. Between last November and the present consultation, however, the map has altered. The version in MM113 (p156) and the SA Addendum (p84) shows clearly that FZ 2 / 3, corresponding to the two different blues in the legend, are confined to the north side of the A406, on the Alan Day showroom site. We compare the two maps in Appendix 518 The lighter colours describing the Pinkham Way FZ area do not correspond to anything in the legend. In PWA's opinion, these ask the reader to infer that there is less flood risk on the south side of the A406. We view this as yet another deliberate attempt to mislead.	within Flood Zone 1, approximately 0.69ha (11.6%) is shown to be within Flood Zone 2 and approximately 0.72ha (12.1%) is shown to be within Flood Zone 3a. The total portion Friern Barnet Sewage Works/Pinkham Way area as falling within Flood Zones 2 and 3a is approximately 23.7%. There is no recognised guidance as to if this constitutes a 'small' portion of the site or not. However, it is considered that in the context of the report the use of 'small' serves only as a description to aid readers. Its inclusion or omission makes no difference to the outcome of the assessment, and the Boroughs are content for the word "small" to be removed as it is unnecessarily contentious. A22-HR Pinkham Way Area Profile refers to parts of the Friern Barnet Sewage Works/Pinkham Way area as being 'at medium risk of flooding' in the context of noting the site will require Site Specific Flood Risk Assessment. The respondent takes issue with the use of 'medium risk of flooding' stating that 'high probability' would be more appropriate. Flood Zone 3a is defined in the NPPG as areas of land with high probability of flooding, having a 1 in 100 or greater annual probability of river flooding or a 1 in 200 or greater annual probability of sea flooding ignoring the presence of defences. However, the NPPG also states that flood risk is a combination of the probability and the potential consequences of flooding. From review of the available flood risk information covering the

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				area it is observed that the Environment Agency's Flood risk from rivers or the sea map shows this part of the site as having medium risk defined as having a chance of flooding of between 1% and 3.3% each year. Therefore, it is possible for an area have both a 'high probability' and 'medium risk' of flooding. In MM113 the use of 'medium risk' is only used to qualify the need for a site specific flood risk assessment and not intended to be an assessment of the areas' flood risk. Again, as its inclusion appears to be unnecessarily contentious, the Boroughs are content for it to be removed. A change is proposed below. All comments provided at consultation on the Plan through its development have been reviewed and acknowledged. Specifically comments from the Environment Agency and the Pinkham Way Alliance led to work being commissioned to update the Flood Risk evidence base that resulted in the Flood Risk Sequential Test Report (dated October 2019) and the Flood Risk Addendum (dated September 2020). Extensive engagement with the Environment Agency was undertaken to inform the updated Flood risk evidence base to ensure up-to-date flood mapping was incorporated into these documents so that it could be properly referenced within the wider Plan documentation. A map has been introduced to A22-HR Pinkham Way

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				Area Profile which depicts the Friern Barnet Sewage Works/ Pinkham Way area and current Flood Zones. It has been suggested that the symbology used in the figure, namely the shading of Flood Zones, is a deliberate attempt to mislead readers into thinking that parts of the area of Friern Barnet Sewage Works/Pinkham Way area within Flood Zone 3a and Flood Zone 2 are at less risk or probability than areas of Flood Zone 3a or 2 outside of the area. In reality, this is simply a reflection of a combination of the colour scheme, the cartographic quality and the overlaying of different constraints. The Flood Zone information has been made clearly and publicly available separately. Given that the consultation responses have indicated no support for the inclusion of the map showing a preferred area for development within the Pinkham Way Area, the Boroughs propose removing this map from the Area Profile and providing amended wording as follows: **PROPOSED CHANGE:** 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 ~~is most likely to be~~

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				~~located would be better suited on land in the control of the NLWA to ensure deliverability~~. 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. ~~should be located in areas with the lowest risk of flooding~~. ~~The map below shows the area of the Priority Area within which a site could come forward once land at risk of flooding and land outside NLWA ownership has been removed.~~ For the avoidance of doubt, there is no "deliberate attempt to mislead". The NLWP team, both past and present, are chartered members of the Royal Town Planning Institute and, as such, adhere to a code of professional conduct. **PROPOSED CHANGES** to A22 Area Profile […] is largely within Flood Zone 1 with an ~~small~~ area to the north of the […] As parts of the Area fall within flood Zone 2 and 3 ~~are at a medium risk of flooding~~ the completion of a

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				suitable Flood Risk Assessment […] 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 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.
MM113	Appendix 2 Haringey Area Profiles A22-HR Pinkham Way	Pinkham Way Alliance	'Given the land is in two ownerships, development would be better suited on land in the control of the NLWA to ensure deliverability …' The fact that the land is owned by two public authorities should have no bearing on the Council's decision as to the need for, or suitability of, the site's allocation. The PWA believes that the	The deliverability of the plan is one of the tests of soundness and therefore ownership of the site is a planning consideration. This repeats matters which have been raised previously and are already being considered by the Inspector.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			Haringey Council was influenced by other public bodies in its failed attempt to reclassify the site as a LSIS, and would urge the Inspector to resist all such influence and pressure on this occasion. Indeed, since all public authorities have a general duty with regard to the preservation and enhancement of the natural environment, the public ownership of the land should, if anything, reinforce its value and potential as a Grade 1 SINC. The site area is stated erroneously as 5.95 ha; this figure includes the 1.88 ha owned by Barnet Council. Not only do the boroughs fail to make it clear that the NLWA portion, and thus the site area for the purposes of the plan, is c 4.07 ha, but they repeat the error throughout the SA Addendum, the Sites & Areas Options Appraisal and even in the Schedule of Modifications. This epitomises the errors that have pervaded assessments of this site. The NLWA land which remains once FZ 2 / 3 are taken out of consideration (c 2.5-3 ha) is predominantly woodland, identified in PWA's Preliminary Ecological Appraisal 2013 as Lowland Mixed Deciduous Woodland, a UK BAP Priority Habitat, albeit, as the Appraisal states, not a significant example.	
MM113	Appendix 2 Haringey Area Profiles	Pinkham Way Alliance	**"These modifications are required to ensure the Plan is consistent with national policy…"** The NPPW states that it '… should be read in	There is a suggestion that the plan has postponed serious issues including flooding to the planning application stage. It is not clear from the context of

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
	A22-HR Pinkham Way		conjunction with the NPPF'. As PWA pointed out at Reg 19, virtually the only mention of the NPPF was its requirement of a sound plan. Thus the boroughs ignored NPPF guidance on environmental value, biodiversity and open space. If the plan truly aspired to be consistent with national policy, the boroughs would have addressed footnote 44 to NPPF Section 117, which gives an important qualification to NPPW guidance on using brownfield land: 'Except where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity' NPPW Appendix B - Land Instability, states: 'Locations, and/or the environs of locations, that are liable to be affected by land instability, will not normally be suitable for waste management facilities'. The lack of cohesion in the different fill layers of unregulated landfill may well result in land instability – to Mr Chris Faulkner's lifelong knowledge of Pinkham Way, there are significant voids there. It is not however apparent in any of the Plan documents that the boroughs have taken this into account. If a plan's intention is to build in some certainty about the deliverability of waste sites, including a site which is likely to throw up serious problems at a later planning stage seems pointless. In our opinion, postponing serious issues such as land	the comment provided if the respondent is suggesting that an area's suitability for development on ground of flood risk has been postponed, or if they are suggesting that the impact of the development on the flood risk to third parties has been postponed (or both). From the context it is assumed that this comment relates solely to the Friern Barnet Sewage Works/Pinkham Way area. This area has been subject to Strategic Flood Risk Assessment and the Sequential Test as outlined in the Flood Risk Sequential Test Report (dated October 2019) and the Flood Risk Addendum (dated September 2020). No matters impacting the viability or suitability of the area for the proposed development on the basis of existing or future flood risk have been identified. This is based on NPPF and NPPG guidance as to how to assess sites at plan making stage. Similarly, no factors that would limit the ability of the site to be developed to include appropriate (SuDS) mitigation, so as not to increase third party flood risk, have been identified. The Area Profile identifies historic landfilling as a potential ground stability issue and advises that further investigation will be required at the planning stage. This is in line with the NPPG which seeks to minimise risk of land instability, avoid development in unstable locations without appropriate precautions and bring unstable land, wherever possible, back into productive use. The NLWA have undertaken their own ground investigations for the site. As summarised within the Flood Risk Addendum "All

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			instability and flooding to the planning application stage is not responsible plan making. From MM113 it appears that the boroughs also failed to take into account NPPF Section 118(b), that planning policies and decisions should: '… recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.' Pinkham Way has performed four out of those six functions since its designation as SINC in 1979. In the decades after the sewage works closure it also provided recreation for local residents with such continuity that in 1988 Haringey gave planning approval to its own application to have the site designated '… for leisure, open space, recreation and other community purposes.' 19Please see Appendix 6 LBH planning permission. PWA considers that this designation would have informed Atkins' assessment of the site in Haringey's Open Space and Sports Assessment 2003, as 'Private Recreational Open Space'. Atkins' remains the extant Open Space assessment, Haringey having excluded the site from its Open Space and Biodiversity Study 2014. The RTPI guidance 'Rising to the Climate Crisis',20 crystallises some of the functions of undeveloped land listed in NPPF 118 b) into its criteria for site selection, which, it states, '… is a foundational component of dealing with climate change …	sites put forward in the NLWP have feasible options to be developed for the intended purposes without increasing flood risk elsewhere – subject to good design which should be captured at the individual site application stage. It is for the Plan to consider the cumulative impact of the proposed polices (and allocations), supported by a strategic flood risk assessment. It is for the individual site applications to consider individual site impact of the proposed development, supported by a site-specific flood risk assessment." This is not considered to be postponed of consideration of issues as it follows NPPF and NPPG guidance on Plan making and planning application submission including the clear hierarchy of information between the Strategic Flood Risk Assessment and Site Specific Flood Risk Assessment. It is suggested that borough have failed to take into consideration that some undeveloped land can perform functions, such as flood risk mitigation. In preparing the flood risk evidence base as review of the draft allocation area against land that was safeguarded from development that is required, or likely to be required, for current or future flood management was undertaken and no conflicts were identified. Furthermore, in preparing the Area Profiles and policies it is noted that attenuation will be required so as to manage runoff from the proposed development to existing levels so as to preserve any flood risk mitigation benefits that

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			Where sites perform poorly against any of the criteria identified, local authorities should consider alternative site allocations'.21 Two criteria apply particularly to Pinkham Way, '… whether development would result in the loss of a significant carbon sink', '… the effect of developing the site on the capacity of biodiversity to adapt to likely climate change.', In our opinion the site fails on both. We commented at the hearings that we were surprised that a plan serving virtually one quarter of London had failed to take the RTPI guidance into consideration, and highlighted the two criteria above. The boroughs did not respond at the hearings, and have failed to address the points in these documents. The boroughs' own consultants considered that the site was 'unlikely to be considered as previously developed land'. Both the NPPF and the London Plan include a definition of brownfield land/PDL which include exclusions from that definition. The consultants' comments quoted these exclusions directly. Had the boroughs bothered to read the supplemental Government advice on waste planning they would have seen that "Not all brownfield sites will be suitable for the range of waste management facilities required to support the Local Plan and some may be of high environmental value. The concern is to ensure	existing areas of undeveloped land may provide. The remaining points repeat matters which have been raised previously and are already being considered by the Inspector.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			good use of suitable 'brownfield' land and avoid turning unnecessarily to greenfield locations'. We are surprised that the Boroughs have apparently not seen fit to consider and address the importance of the site's contribution to nature conservation, as a brownfield site with environmental value. This is one of the unresolved issues about the Pinkham Way site that Haringey have refused to address and which continue to concern us. We have argued that the site is not a site in need of rehabilitation or development as it is performing its designated planning purpose as a Borough SINC and has been doing so since its designation. We have provided Haringey Council with case law on this point but the Council refuses to discuss it. We draw this case to the attention of the Inspector now, as we believe it is relevant to this MM given that the Boroughs have still not properly assessed this site. The case is Dodd and Hands v Sec of State for Environment Transport and the Regions CO/3513/2001 High Court QBD 22 Jan 2002 It concerned an application for housing on a disused railway station site which the applicants claimed was PDL. The council refused on two grounds, one of which was that the site did not fall within the definition of PDL. The site was a former railway station that had closed in the 1960s and not been reused. A	

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			station platform and another brick structure remained visible but on a relatively small portion of the site. Over time evidence of the former use had largely disappeared and blended into the landscape. The case dealt in some detail with the definition of PDL and in particular with exclusions from the definition. At para 37 Justice Sullivan stated that "… once the remains of any structure or activity have blended into the landscape and have become part of the natural surroundings it is difficult to see why such a site should, for planning policy purposes, be treated any differently from a green field site" and At para 38 he said "… if there is a clear reason that could outweigh the re-use of the site, such as the contribution of the site to nature conservation, it is difficult to see why that should not suffice to exclude the land from the definition of PDL; In the Dodd and Hands case, the contribution to nature made by the site had to be implied. In the case of the Pinkham Way site, its environmental importance and its contribution to nature conservation for the past 40 odd years has been recognized by the Borough SINC designation. We have argued for some time with Haringey Council that the Pinkham Way site should be treated as a greenfield site and as such should not be included in a waste plan.	

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
MM113	Appendix 2 Haringey Area Profiles A22-HR Pinkham Way	Pinkham Way Alliance	"Any new waste facility … will need to be in line with the Haringey Local Plan and the London Plan" HARINGEY LOCAL PLAN In his pre-hearing letter before the 2012 NLWP EiP, Inspector Andrew Mead stated his initial aim in dealing with Pinkham Way: To consider the Planning Status of the site. Eight years later, this status has still not been fully considered as we pointed out in our Submission MM5 Q63. There are a number of outstanding unresolved planning issues on this site that the Council refuses to deal with: open space status, brownfield land with environmental value, conflicting designation of Employment and Borough SINC, contamination, instability and more. However, the conflicting dual designation is the most important. Prior to the Local Plan hearing in 2012, Inspector Seaman asked the Council how it intended to resolve the conflict between the dual designations. The answer given was that the designation 'had always existed'. In his Report the Inspector asked the Council to review the site's designation taking into account its environmental value, its open space value etc etc. The Council subsequently reviewed the site but omitted to consider its open space value. Instead it deliberately excluded Pinkham Way from the	The NLWP reflects designations in the Haringey Local Plan. This repeats matters which have been raised previously and are already being considered by the Inspector.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			open space review that was carried. The reason given to PWA for doing so was that the site was not publicly accessible. However the Council included other open spaces which were inaccessible. Following the Haringey Site Allocations EiP, where the Pinkham Way site was removed from the plan, Inspector Thorby advised the Council to review the employment designation as required by NPPF. The designation has never produced employment but the SINC designation has consistently contributed to nature conservation in the borough. If the Inspector is in a position to resolve these issues we respectfully request that he considers: • Recommending that the Pinkham Way site be removed from the plan • that the site satisfies the definition of Open Space in the London Plan and in Haringey's local plan • that the site cannot be considered PDL in need of remediation as it satisfies the exclusion from that definition in the London Plan and the NPPF and should be considered a brownfield site with high environmental value (we refer the Inspector to the case of Dodd and Hands22 The Inspector may recall that PWA made a late submission (MM4 Q49 Supplementary Hearing Statement and Appendices)23 relating to the incorrect identification of Pinkham Way as an LSIS in the AECOM Report which had informed the	

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			London Plan and the NLWP. When we asked the Boroughs why they had relied on that report to include Pinkham Way as industrial land when they knew perfectly well that it had wrongly identified the site as LSIS they replied that they were entitled to rely on the Report. PWA then attempted to find out how and why the site had been incorrectly classified in AECOM's Report. After consulting their legal department, AECOM were unwilling to discuss it and referred us to the GLA. The GLA's opinion was that, because Pinkham Way was a site that could theoretically provide industrial / employment capacity, AECOM were right in categorising it as LSIL. At the beginning of this consultation PWA contacted the Boroughs' Programme Manager to ask if the AECOM errors had been corrected and were advised that: 'AECOM's 'London's Industrial Land Supply and Economy Study 2015' is referenced in the Sites and Areas Report which has not been updated as part of the Main Modifications.' 24 Pinkham Way remains described as an LSIS in the GLA Industrial Land Study, potentially misleading those who consult it and wasting their time pursuing a site that is anything but industrial land. Significant time and resources have been wasted by the Boroughs, NLWA, GLA, AECOM and local	

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			residents engaged in various attempts to defend, remove or retain the Employment designation on Pinkham Way. We would respectfully remind the Inspector that the Pinkham Way site was removed from Haringey Council's Site Allocations DPD, with the agreement of the Council, during the course of its Public Examination because it was not required to meet the employment needs of the Borough over the plan period. This was confirmed thereafter in the Inspector's Report by way of an MM In Section 10 of our Reg 19 submission we chronicled in detail Haringey Council's treatment of the site's planning status since 2009/10, and its repeated opportunities since 2009 to conduct a sound, objective assessment of the site in the light of its own policies. Our response to Question 63 (d) listed a raft of Council policies which conflict directly with development of Pinkham Way for waste use. The boroughs have not addressed our response and instead have postponed these issues to the planning application stage. We believe these matters should be dealt with at the plan making stage when the plan making concerns allocation of areas for a particular type of development. THE LONDON PLAN Prior to the hearing in November 2019, the Inspector asked at question 63 (c): 'Does the fact that this site is not a Strategic Industrial Location	

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			(SIL) or a Locally Significant Industrial Site (LSIS) preclude its use for waste management purposes?' The councils offered no response. In the present Sites and Areas Options Appraisal Section 2, they give a nod towards the London Plan SIL / LSIS stipulation, whilst avoiding the definitive words at 9.8.8. They continue: '… the boroughs have sought to take this approach a stage further and identify the best land for a range of new waste facilities.' They offer no explanation a) why this sudden finesse in site selection is necessary or justified, or b) on what basis they have ignored the London Plan's own considered guidance – consulted upon and publicly examined - on what constitutes 'the best land'. They have disregarded the fact that the guidance is included in their own Local Plans, of which the NLWP is part. We consider that, as with the category of 'High-performing Band B sites', this is an artifice to facilitate the progress of Pinkham Way. -------- The boroughs correctly quote one part of London Plan Policy G6 (D), about biodiversity net gain. However, they omit mention of the previous section, that '… the benefits of the development proposal should clearly outweigh the impacts on biodiversity'. They have not acknowledged that NPPW must be considered in conjunction with NPPF. We notice	

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			they still omit reference to NPPF in the plan except to make general reference to it. It is not mentioned once in the Report on Sites and Areas. At the hearings, all the NLWA could offer (verbally) was that, towards the end of plan period, they '... might need a site in the west of our area for something connected with the Circular Economy'. At 8.6.2, the London Plan states: 'The level of protection afforded to SINCS should be commensurate with their status and the contribution they make to wider ecological networks.' The Inspector may recall that PWA's Preliminary Ecological Appraisal 2013 was produced by the Boroughs' representative at the hearing in November 2019. He was clearly anxious to show that they had taken it into account when assessing the Pinkham Way site. However it emerged that the boroughs had only read it two weeks before the hearing. That report was relevant to the assessment of the site and should have been considered in 2014 and thereafter, when the assessments were being undertaken. To admit that they had waited over six years, before opening it just before the Public Examination, demonstrates that they had not been taken it into account at all. Had the Boroughs bothered to read the Ecological Appraisal they would have seen, amongst many	

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			other important matters that affected the site's ecological value, that '… the site is positioned along an ecological corridor and offers an important green link between other sites. This is noteworthy within the context of inner London where well connected sites are becoming increasingly rare.'	
MM113	Appendix 2 Haringey Area Profiles A22-HR Pinkham Way	Pinkham Way Alliance	We make the following comments on the Sustainability Assessment of MM113 Potential Mitigation Measures The boroughs list a raft of mitigation measures which were not identified when the site was originally assessed for inclusion. We are of the view that, given the substantial changes proposed to the overall size and available area for any potential development, together with the list of potential mitigation that would be required, the Pinkham Way site is undeliverable • Habitat connectivity a) With adjacent green spaces b) With the ecological corridor, which needs to be enhanced • Extensive programmes for enhancing and protecting valuable ecological features (which only underlines the NLWA's historic and ongoing neglect of the site) • Creating buffers between facility and sensitive receptors • Creating buffer between facility and ecological corridor	These comments relate to the changes made to Area Profiles A22-HR Pinkham Way rather than the SA. The "raft of mitigation measures" referred to by PWA are, in most part, signposting to policies in Haringey's Local Plan and the London Plan. These are not additional mitigation measures, but existing policies against which any development within the Pinkham Way Priority Area will be assessed. The proposed additional signposting is intended not only to assist the developer, but to help the local community by providing better clarity of the wider policy framework for the site. Some of the proposed changes are in response to comments from PWA, including consideration of public access to the site. For clarity on the SA, the 'minor positive' score (given in the 'Implications for SA' column of Appendix A of the SA Addendum) is not a holistic sustainability rating of the site allocation. It is a rating that reflects that

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			• Creating 'acceptable access' from Orion Road roundabout. Since the boroughs mention both 'access' and 'acceptable access', we assume that they have taken into consideration their duty to protect the area of OMH, UK BAP Priority Habitat, which extends around the north of the site inside the bund. PWA's consultant found this to be very rich in invertebrates. It goes without saying that it would be impossible to relocate such an area. • Contamination, which must take into consideration Arup's advice to NLWA that 'Remediation of any area will destroy nature conservation of that area' • Ground stability and variations in height • Possible whole or part de-culverting of watercourse. • Maintaining public access to remainder of site. The list omits other relevant considerations, for instance: • PWA's ecological consultant identified the woodland that occupies most of the available developable area as Lowland Mixed Deciduous, a UK BAP Priority Habitat, albeit not a significant example. Nonetheless it must be one of the 'important ecological features' mentioned above as requiring protection and enhancement. • The boroughs will need to address what Arup's Scoping Report 2011 described as '… the potential for significant adverse effects on these [surrounding] sites', ie the adjacent MOL and	the changes included in MM113 result in a plan that more positively contributes to the SA objectives than the previous iteration of the plan.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			neighbouring links in the green chain. Even as they stand, we consider that the mitigation measures suggested in the SA Addendum go far beyond a normal definition of 'significant', the term used to categorise necessary mitigation in Band C sites that the Sites and Areas Options Appraisal describes as 'possibly suitable for waste use'. An objective assessment of a site that requires so much varied mitigation would, in our opinion, report that the site was not suitable for further consideration and should be placed in Band D/removed from the Plan. At the hearings we remarked on the anomaly of Pinkham Way's present inclusion in Band B when Band C includes sites that are considerably less sensitive. The boroughs did not respond at the hearings, nor have they addressed the point anywhere in these documents.	
MM113	Appendix 2:	Environment Agency	[Comments also apply to MM113]	The 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. ~~It is considered that the site Area would be suitable for the proposed "Less Vulnerable" developments. The Area would pass the sequential~~

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				~~test.~~ The exception test would not be applicable. […] this will increase in ~~with~~ the future as a result of climate change […] A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current ~~following~~ climate change allowances at the time of submission. ~~into the assessment:~~ • ~~Use central (25% increase from 2070 to 2115) for peak river flow~~ • ~~Use central (20% increase from 2070 to 2115) and upper end (40% increase from 2070 to 2115) for peak rainfall intensity.~~
MM113	Appendix 2: Haringey Area Profiles A22-HR Pinkham Way	Freehold Community Association	• A sequential test should have been carried out for Pinkham Way. • The plan should consider surface water run off at Pinkham Way. • Bounds Green Industrial estate and Summers Lane Waste and Recycling Centre are more appropriate sites than Pinkham Way.	The suggestion that the Plan is not compliant with NPPF by reason of not undertaking a Sequential Test has been interpreted to mean that the respondent takes issue with the Sequential Test that has been undertaken rather than arguing that no Sequential Test has been prepared. The current version of the Sequential Test is dated October 2019 and supported by the Flood Risk Addendum dated September 2020. The Sequential test assesses 13 areas identified within the proposed submission Plan to be considered for future waste facilities of which Friern Barnet Sewage Works/Pinkham Way was one site (reference A22-HR). Based on the wider context of the comments it is assumed that the respondent is suggesting that the Sequential Test is 'unsound' because it does not

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				consider Summers Lane and Bounds Green Industrial Estate as potential allocation sites. The North London Boroughs have provided justification for the selection of sites and areas in the NLWP as part of the evidence base submitted with the NLWP. Assessment criteria for sites and areas were developed in consultation with focus groups. Freehold Community Association were involved in this process and further information can be found in the Focus Groups Outcomes Report. Bounds Green Industrial Estate is not included in the NLWP because it does not meet the criteria. Summers Lane is an existing waste site and is safeguarded for waste use. Therefore, neither site is considered to be a reasonably available alternative site (NPPF paragraph 158) and would not be featured in the Sequential Test. The Sequential Test considered and reported flood risk from all sources across the areas. Of the 13 areas, only 3 were found to be exclusively within Flood Zone 1, and it was identified that these areas were within Critical Drainage Areas and contained areas subject to surface water flood risk. It was therefore found that not all the required development could be allocated to areas within Flood Zone 1, and it was consequently found by following the NPPF and NPPG Sequential Test guidance, that it was appropriate to consider development in Flood Zone 2. Of the 10 remaining areas (excluding the 3 Flood Zone 1 areas) only 2 were observed to fall within Flood Zone 1 and Flood Zone 2 (and not Flood Zone 3a). These two areas were

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				observed not to be within Critical Drainage Areas but contained areas subject to surface water flood risk. It was therefore found that not all the required development could be allocated to areas within Flood Zone 1 and Flood Zone 2 and it was consequently found by following the NPPF and NPPG Sequential Test guidance that it was appropriate to consider development in Flood Zone 3a. The remaining 8 areas all feature some proportion of the site that falls within Flood Zone 3a. All development has the potential to increase flood risk elsewhere, this is particularly the case where increased areas of impermeable surfaces are introduced as a result of the development. To mitigate this, sustainable drainage systems can be designed to replicate pre-development runoff conditions. There are multiple local, regional and national policy requirements to be applied when determining planning applications for sites requiring the design and construction to mitigate run-off so as not to increase flood risk elsewhere. There are many examples of sites within critical drainage areas where development has been designed to manage surface water runoff so as not to increase flood risk elsewhere. It is not clear from the response which part of the Flood Risk Addendum the respondent takes issue with as misinterpreting NPPF flood risk Policy. There is a discussion in the Sequential Test and the Flood Risk Addendum about requirements for site specific Flood

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				Risk Assessments that will be required to be developed once the Plan has been adopted and the individual development sites come forward for planning permission. This includes discussion on the site layout within the allocated. This should not be confused with the Sequential Test (outlined NPPF and NPPG) which considers the wider site risk and overall use vulnerability. The planning of site layout is a well-established principle and is directly supported by section 5.3.2 of British Standard BS8533-2017 Assessing and managing flood risk in development – Code of Practice and NPPF paragraph 163 a).
MM113	Appendix 2: Haringey Area Profiles A22-HR Pinkham Way	North London Waste Authority (NLWA)	• The wording about community concerns in relation to the potential development of the Pinkham Way site for waste uses is not an appropriate amendment to a policy document and is contrary to the fact that a plan must be positively prepared. The Plan should be confined with setting out the appropriate mitigation to address agreed concerns. • The reduced area in Pinkham Way suitable for potential development is not justified because waste facilities can be developed on flood risk areas and therefore the modification is considered unsound. • Barnet has not submitted any evidence to say that land in their ownership should not be considered for waste use.	The Area Profiles are not policy; they set out information for developers and this is made clear in para 9.15. It is appropriate for any developer of the Pinkham Way site to understand that there are community concerns. The plan is positively prepared in seeking to meet the objectively assessed needs whilst appropriately respecting constraints. The modifications to the Area Profile seek to set out the mitigation which will address community concerns. These include signposting to environmental protection planning policies, recognising that the dual designations of SINC and employment land means that only a proportion of the Area should be developed. A change is proposed (see below) to bring the wording in line with the NPPF policy on developing in areas at risk of flooding. Barnet have submitted a form to Haringey in response

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				to their Local Plan 'call for sites' exercise. This states that a waste use is not proposed as a future use within the Pinkham Way site under Barnet's ownership. The consultation responses have provided no support for the inclusion of the map showing a preferred area for development within the Pinkham Way Area. Therefore the Boroughs propose removing this map from the Area Profile with wording amended as follows: **PROPOSED CHANGES:** 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. 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

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				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 ~~is most likely to be located would be better suited on land in the control of the NLWA to ensure deliverability~~. 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. ~~should be located in areas with the lowest risk of flooding~~. ~~The map below shows the area of the Priority Area within which a site could come forward once land at risk of flooding and land outside NLWA ownership has been removed.~~
MM114	Appendix 2: Waltham Forest Area Profiles A24-WF Argall Avenue	Environment Agency	• The wording within Area Profile that infers that because the development uses will be 'Less Vulnerable' and this is compatible with Flood Zones 2/3 that the Sequential Test is passed which is not the correct of the Sequential Test. • The wording within Area Profile that doesn't make clear that potential increases in future flooding is due to climate change. • Additional wording should say that any site-specific FRA must use the latest climate	It is agreed that the highlighted wording in the Area Profiles do not reflect the approach outlined in the October 2019 Flood Risk Sequential Test Report or NPPF and NPPG and should be updated to better reflect the approach taken. The clarification that increase in future flood risk is from Climate Change is welcome addition. Amending the references to the climate change allowances to put emphasis on applicants using the current values at time of their planning application removes the risk of contradiction in the event that

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			change guidance.	climate change guidance is updated. **PROPOSED CHANGES**: The site area falls partially within Flood Zone 1, Flood Zone 2 and Flood Zone 3. ~~It is considered that the site area would be suitable for the proposed "Less Vulnerable" developments and should pass the sequential test,~~ 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. ~~It~~ The exception test would not be applicable. […] this will increase in ~~with~~ the future as a result of climate change […] A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current ~~following~~ climate change allowances at the time of submission.~~ into the assessment:~~ • ~~Use central (25% increase from 2070 to 2115) for peak river flow~~ • ~~Use central (20% increase from 2070 to 2115) and upper end (40% increase from 2070 to 2115) for~~

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				~~peak rainfall intensity.~~
MM115	Appendix 2: Waltham Forest LLDC Area Profiles LLDC3-WF Temple Mill Lane	Environment Agency	• The wording within Area Profile that infers that because the development uses will be 'Less Vulnerable' and this is compatible with Flood Zones 2/3 that the Sequential Test is passed which is not the correct of the Sequential Test. • The wording within Area Profile that doesn't make clear that potential increases in future flooding is due to climate change. • Additional wording should say that any site-specific FRA must use the latest climate change guidance.	It is agreed that the highlighted wording in the Area Profiles do not reflect the approach outlined in the October 2019 Flood Risk Sequential Test Report or NPPF and NPPG and should be updated to better reflect the approach taken. The clarification that increase in future flood risk is from Climate Change is welcome addition. Amending the references to the climate change allowances to put emphasis on applicants using the current values at time of their planning application removes the risk of contradiction in the event that climate change guidance is updated. **PROPOSED CHANGES**: The site area is largely Flood Zone 2 with a small area of Flood Zone 3. ~~It is therefore considered that the site area would be suitable for the proposed "Less Vulnerable" developments and should pass the sequential test.~~ 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.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
				[…] this will increase in ~~with~~ the future as a result of climate change […] A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current ~~following~~ climate change allowances at the time of submission.~~ into the assessment:~~ • ~~Use central (25% increase from 2070 to 2115) for peak river flow~~ • ~~Use central (20% increase from 2070 to 2115) and upper end (40% increase from 2070 to 2115) for peak rainfall intensity.~~
AM	1.11	Pinkham Way Alliance	We can find no reference in the Schedule of MM's / AM's for the changes made to this paragraph. We note the JWS document referred to expires in 2020. That is more relevant that its quoted start date (2009). How and if a new JWS is expected, when, and how it contributes, if at all, to the NLWP should be made explicit. We note in NLWP Figure 3, which follows 1.11, that a JWS is a core element of the Hierarchy of Planning Guidance Policies and Strategies relating to the NLWP, yet at this stage there doesn't seem to be one, and the prospect of one in future has been indicated as being both a yes and a no / maybe. The importance or otherwise of the (now expired)	This should have been included as an AM and will be added to the final Schedule of Modifications. See MM58 for comments on the JWS.

MM reference	NLWP paragraph	Name/Organisation	Summary of representation	Response from the North London Boroughs
			Joint Municipal Waste Management Strategy is also highlighted as a key plan hierarchy item for developers (NLWP 1.12 and shown in NLWP Fig 3). It has however been replaced with "national planning policy and guidance" in the summary paragraph (1.12) relating to the Figure. We suggest consistency is required for both clarity and necessary understanding. NLWP 3.2 includes references to elements, in particular waste prevention and reduction strategies, which "influence but are outside of the planning framework". Such elements are integral to the (existing) JWS and the anticipated new JWS (EIP, NLWA representative verbal input) – an integral part of the NLWP planning framework. It is not possible to reflect and suggest on the standing of certain MM's until it is clear what the boroughs / NLWA intend in respect of the future JWS. In this regard, the position of the JWS will be a fundamental driver of NLWP 3.4 / Strategic Objective 3, "taking into account … the requirements of the North London Waste Authority." Having those requirements evidenced in the JWS will support the soundness of a NLWP; without such clarity it is difficult to view it as being positively prepared or justified. We note that the plan does reference (5.12), "The NLWA's long term waste management solution is based upon the continued use of the existing	

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			Edmonton facility until 2025 and the development of a new energy recovery facility on the same site to be operational from 2025 onwards". This gives the impression NLWA's totality of interest will be in residual waste (only); something not in keeping with the broader thrust of the plan.	
N/A	N/A	Stella D'Alberti	I would like you to listen to the concerns of the families who live in the area about the air quality, noise, traffic and the impact that these factors will have on people health.	The NLWA decision-making and the DCO application for the North London Heat and Power Project is outside the scope of the NLWP consultation. The NLWP reflects the plans of the NLWA. The difference between the NLWP and the NLWA is set out in the NLWP FAQs. The NLHPP DCO application included an Environmental Statement assessed air quality and noise, a Health Impact Assessment which considers health impacts of the development and a Transport Assessment which assesses the impact of traffic.
N/A	N/A	Cathy Mears	I'm extremely concerned about the plans to redevelop Edmonton Incinerator and believe a pause and a rethink is badly needed. costs have spiralled and a Value for Money (VfM) review of the project is required.	The NLWA decision-making and the DCO application for the North London Heat and Power Project is outside the scope of the NLWP consultation. The NLWP reflects the plans of the NLWA. The difference between the NLWP and the NLWA is set out in the NLWP FAQs. The NLHPP DCO application included an Alternatives Assessment Report which concludes that ERF is more cost effective than alternative technologies. The NLHPP website also includes information on

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				programme costs and funding. The NLHPP DCO application included a Health Impact Assessment which considers health impacts of the development.
N/A	N/A	Stop The Edmonton Incinerator Now	The North London Waste Authority over-forecasts the amount of residual waste that North London generates, and the NLWP therefore plans for waste capacity that far exceeds requirements. I would also like to raise the completely inadequate notice for this consultation.	The NLWA modelling and the DCO application for the North London Heat and Power Project is outside the scope of the NLWP consultation. The NLWP reflects the plans of the NLWA. The difference between the NLWP and the NLWA is set out in the NLWP FAQs. The NLWA responded to comments about residual waste capacity modelling as part of the NLHPP DCO consultation in the Consultation Report. The Waltham Forest News is only published quarterly. The edition advertising the NLWP consultation was due to be published on 20th November 2020 but was pushed back by two weeks to 7th December. Unfortunately the Boroughs had no control over this.