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Via Programme Officer

5th August 2021

Dear Sir,

Examination of the North London Waste Plan and the revised National Planning Policy Framework

Thank you for your letter of 22nd July 2021 concerning the government's revisions to the National Planning Policy Framework (NPPF) and requesting the Boroughs' comments on the implications of this for the Examination of the North London Waste Plan (NLWP).

The Boroughs have had the opportunity to consider all the revisions to the NPPF relevant to the NLWP and have set these out in a schedule appended to this letter alongside comments on the implications of each.

Most of the revisions to the NPPF do not have any implications for the NLWP. However, the Boroughs feel that there is an opportunity to update some of the wording in the Plan's supporting text to better reflect the language in the revised NPPF. These proposed changes are limited to three paragraphs (4.26, 9.41 and 9.48) and relate to flood risk and vehicle emissions.

The proposed updates are not considered to affect the approach of the NLWP.

Yours sincerely

Victoria Manning
Programme Manager, North London Waste Plan

Appendix A: Schedule of NPPF revisions and implications for NLWP

Bold – new text
~~Strikethrough~~ – deleted text
N/A denotes policy area which does not apply to the NLWP

Section of the NPPF	Revision to NPPF	Implications for the NLWP
1. Introduction	[Minor amendments to footnotes]	No implications
2. Achieving sustainable development	7. The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. **At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection**. 8b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering ~~a~~ well-designed, **beautiful** and safe ~~built environment~~ **places**, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and 8c) an environmental objective – to ~~contribute to~~	<u>Paragraph 7</u> The 17 Sustainable Development Goals (SDG) were adopted by all UN Member States in 2015. Targets for SDG11: Sustainable Cities and Communities are embedded in national planning policy. The NLWP is consistent with national policy, therefore this change has no implication for the NLWP. <u>Paragraph 8b)</u> The introduction of the phrase "beautiful places" is not considered to affect the approach of the NLWP. This change has no implication for the NLWP. <u>Paragraph 8c)</u> This change is to the syntax of the sentence rather than the meaning and therefore does not have an implication for the NLWP. <u>Paragraph 11a)</u> The NLWP promotes a **sustainable pattern of development** by planning for waste management capacity within North London to meet the

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	~~protecting~~ **protect** and ~~enhancing~~ **enhance** our natural, built and historic environment; including making effective use of land, ~~helping to improve~~ **improving** biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. 11. Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) **all** plans should ~~positively seek opportunities~~ **promote a sustainable pattern of development that seeks** to: meet the development needs of their area; **align growth** and ~~be sufficiently flexible to~~ **infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and** adapt to ~~rapid change~~ **its effects**; i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development **proposed**; [Minor amendments to footnotes]	equivalent of waste generated in North London. This is set out in the Aim and Objectives of the NLWP. The NLWP **aligns growth and infrastructure** by projecting waste management need in line with growth and planning for the infrastructure to meet it. This is set out in Chapter 6 'Future Waste Management Requirements'. The NLWP includes policies to **improve the environment and mitigate climate change**, in particular Policy 5: 'Assessment Criteria for waste management facilities and related development'. In addition, Area Profiles include signposting to other relevant national and regional environmental policies which will form part of the decision-making when considering a planning application for a new or expanded waste site in North London. NLWP Policies 1 'Existing waste management sites' and 2 'Priority Areas for new waste management facilities' **make effective use of land** by safeguarding existing waste sites and identifying the most suitable locations for new waste management facilities in North London. It is considered that the NLWP is already in line with the new wording in the NPPF and no further change is required. <u>Paragraph 11a)</u> This change is to the syntax of the sentence rather

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		than the meaning and therefore does not have an implication for the NLWP.
3. Plan-making	20. Strategic policies should set out an overall strategy for the pattern, scale and **design** quality of ~~development~~ **places**, and make sufficient provision for: 22. Strategic policies should look ahead over a minimum 15 year period from adoption1415, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. **Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.** 35. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are: 35d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework **and other statements of national planning policy, where relevant.** [Minor amendments to footnotes]	<u>Paragraph 20</u> The introduction of the word "**design**" and replacement of "development" with "**places**" is not considered to affect the approach of the NLWP. This change has no implication for the NLWP. <u>Paragraph 22</u> The new wording does not apply to the NLWP which looks ahead for 15 years. This change has no implication for the NLWP. <u>Paragraph 35</u> The NLWP already highlights consistency with other relevant **statements of national planning policy.** For example, National Waste Management Plan for England (1.5), National policy for renewable energy (9.59) and Planning Statement on Waste Water (9.63). This change has no implication for the NLWP.
4. Decision-making	53. The use of Article 4 directions to remove national	Area Profiles note if there is an Article 4 directions

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	permitted development rights should: • **where they relate to change from non-residential use to residential use,** be limited to situations where ~~this~~ **an Article 4 direction is necessary to avoid wholly unacceptable adverse impacts (this could include the loss of the essential core of a primary shopping area which would seriously undermine its vitality and viability, but would be very unlikely to extend to the whole of a town centre)** • **in other cases, be limited to situations where an Article 4 direction** is necessary to protect local amenity or the well-being of the area (this could include the use of Article 4 directions to require planning permission for the demolition of local facilities) • **in all cases, be based on robust evidence, and apply to the smallest geographical area possible.** • [Minor amendments to footnotes]	within the Priority Area. No changes are proposed by the Boroughs to Article 4 directions as a result of this change to the NPPF. This change has no implication for the NLWP.
5. Delivering a sufficient supply of homes	N/A	No implications for the NLWP
6. Building a strong, competitive economy	[No changes proposed]	No implications for the NLWP
7. Ensuring the vitality of town centres	N/A	No implications for the NLWP
8. Promoting healthy and safe communities	92b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the	<u>Paragraph 92b)</u> The introduction of the words "**attractive, well-design**" and "**cycle**" is not considered to affect the

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	use of **attractive, well-designed**, clear and legible pedestrian **and cycle** routes, and high quality public space, which encourage the active and continual use of public areas; 96. **To ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted.** 98. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, **and can deliver wider benefits for nature and support efforts to address climate change**. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate. [Minor amendments to footnotes]	approach of the NLWP. This change has no implication for the NLWP. <u>Paragraph 96</u> Waste infrastructure appears to fall outside the definition of "public service infrastructure" referred to in this paragraph. Therefore this change has no implication for the NLWP. <u>Paragraph 98</u> Planning for open spaces and opportunities for sports is done through each borough's Local Plan. However, the NLWP reflects borough Local Plans and protected open space through the site selection criteria (see NLWP Table 10) and Policy 5f). The additional wording is not considered to affect the approach of the NLWP. This change has no implication for the NLWP.

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9. Promoting sustainable transport	106d) provide for ~~high quality~~ **attractive and well-designed** walking and cycling networks ~~and~~ **with** supporting facilities such as **secure** cycle parking (drawing on Local Cycling and Walking Infrastructure Plans); 110c) **the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code** [Minor amendments to footnotes]	<u>Paragraph 106d)</u> The introduction of the words "**attractive, well-design**" and "**secure**" is not considered to affect the approach of the NLWP. This change has no implication for the NLWP. <u>Paragraph 110c)</u> This new paragraph applies to detailed design and is not considered to affect the approach of the NLWP. This change has no implication for the NLWP.
10. Supporting high quality communications	[No changes proposed]	No implication for the NLWP.
11. Making effective use of land	125 **Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places.** Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies	<u>Paragraph 125</u> Area-based character assessments, design guides and codes and masterplanning is done through each borough's Local Plan. The additional wording is not considered to affect the approach of the NLWP. This change has no implication for the NLWP.
12. Achieving well-designed places	126. The creation of high quality, **beautiful and sustainable** buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being	<u>Paragraph 126</u> The introduction of the words "**beautiful, and sustainable**" is not considered to affect the approach of the NLWP. This change has no implication for the NLWP.

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	clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process. 127. Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood ~~plans~~ **planning groups** can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, **both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers**. 128. To provide maximum clarity about design expectations at an early stage, ~~plans or supplementary~~ **all local** planning ~~documents~~ **authorities** should ~~use visual tools such as~~ **prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and** design **preferences**. **Design** guides and codes. ~~These~~ provide a **local** framework for creating **beautiful and** distinctive places,	<u>Paragraphs 127-129 and 133-134</u> Each Borough or neighbourhood planning group will be responsible for developing local design codes and any development will be assessed against these. Policy 5e) of the NLWP requires high quality design. And the supporting text (9.36) goes on to say that waste facilities "should be designed to minimise its impact on the local area and ensure it is compatible with existing surrounding land uses." This is in line with the new wording in NPPF paragraphs 127-129. The supporting text also states "When assessing planning applications for waste uses, in addition to Policy 5, the boroughs will also have regard to the criteria in Appendix B of the NPPW and relevant London Plan and Local Plan policies." This would include any design codes adopted by the Borough and is therefore in line with the new wording in NPPF paragraphs 127-129. Therefore this change has no implication for the NLWP. <u>Paragraph 131</u> Existing trees within the NLWP Priority Areas are identified within the Area Profiles. All development proposals for waste facilities in North London will be assessed against local policies as well as London Plan policy G7: 'Trees and Woodland', which states that development proposals should ensure that, wherever possible, existing trees of value are

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	with a consistent and high quality standard of design. ~~However their~~ **Their geographic coverage**, level of detail and degree of prescription should be tailored to the circumstances **and scale of change** in each place, and should allow a suitable degree of variety ~~where this would be justified~~. 129. **Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. Landowners and developers may contribute to these exercises, but may also choose to prepare design codes in support of a planning application for sites they wish to develop. Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code. These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes**. 131. **Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined50, that opportunities are taken**	retained. The additional wording is not considered to affect the approach of the NLWP. This change has no implication for the NLWP.

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	to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users. 133. Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include workshops to engage the local community, design advice and review arrangements, and assessment frameworks such as Building for **a Healthy** Life. These are of most benefit if used as early as possible in the evolution of schemes, and are particularly important for significant projects such as large scale housing and mixed use developments. In assessing applications, local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels. 134. ~~Permission~~ **Development that is not well designed** should be refused ~~for development of poor design that fails to take the opportunities available for improving~~	

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	~~the character and quality of an area and the way it functions~~**, especially where it fails to reflect local design policies and government guidance on design**, taking into account any local design ~~standards or style guides in plans or~~ **guidance and** supplementary planning documents **such as design guides and codes**. Conversely, ~~where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development~~ **significant weight should be given to:** **a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or** **b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.**	
13. Protecting Green Belt land	N/A	No implication for the NLWP.
14. Meeting the challenge of climate change, flooding and coastal change	161. All plans should apply a sequential, risk-based approach to the location of development – taking into account **all sources of flood risk and** the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by: […]	<u>Paragraph 161</u> The NLWP has taken into account **all sources of flood risk** when assessing Areas for new waste facilities and this is set out in the Flood Risk Assessment. The NLWP is therefore in line with the NPPF new wording.

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	c) using opportunities provided by new development **and improvements in green and other infrastructure** to reduce the causes and impacts of flooding, (~~where appropriate through the~~ **making as much** use **as possible** of natural flood management techniques **as part of an integrated approach to flood risk management**); 162. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding **from any source**. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding. 163. If it is not possible for development to be located in ~~zones~~ **areas** with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in ~~national planning~~	<u>Paragraphs 161c), 162-163 and 167</u> Policy 5l of the NLWP requires applications for waste management facilities to demonstrate that the development has no adverse impact on Flood Risk on or off site and aims to reduce risk where possible. There is an opportunity to update the wording in paragraphs 9.48 to better reflect the language in the NPPF. Proposed changes: 9.48 The North London Strategic Flood Risk Assessment (SFRA) and individual borough 'Level 2' SFRAs have demonstrated the current risks from flooding from ~~various~~ **all** sources **of flood risk** across North London […].Where a site is near or adjacent to areas of flood risk, the development is expected to contribute through design to a reduction in flood risk**, making as much use as possible of natural flood management techniques, and be appropriately flood resistant and resilient** in line with the **NPPF and** NPPG. […] A sequential approach to the layout of the site should be taken aiming to locate development in the parts of the site at lowest risk of flooding **from any source**. […]

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	~~guidance~~ **Annex 3**. 167. b) the development is appropriately flood resistant and resilient **such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment**; [changes to sections on Coastal Areas]	
15. Conserving and enhancing the natural environment	180. **When determining planning applications, local planning authorities should apply the following principles:** **a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts),** adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to ~~incorporate~~ **improve** biodiversity ~~improvements~~ in and around developments should be ~~encouraged~~ **integrated as part of their design**, especially where this can secure measurable net gains for biodiversity **or enhance public access to nature where this is appropriate**. [Changes related to National Parks, the Broads and Areas of Outstanding Natural Beauty]	<u>Paragraph 180</u> NLWP paragraph 9.44 states that "Development proposals will be assessed against this policy as well as other relevant principles and policies set out in the NPPF and Borough Local Plans." This means that the new wording in NPPF paragraph 180 will be considered as part of any planning application for a new waste facility in North London. This change has no implication for the NLWP.
16. Conserving and enhancing	N/A	No implications for the NLWP.

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the historic environment		
17. Facilitating the sustainable use of minerals	N/A	No implications for the NLWP.
Annex 1: Implementation	218. The policies in this Framework are material considerations which should be taken into account in dealing with applications from the day of its publication. Plans may also need to be revised to reflect policy changes which this ~~replacement~~ Framework has made. ~~This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.~~ 220. The policies in the ~~previous~~ **original National Planning Policy Framework** published in March 2012 will apply for the purpose of examining plans, where those plans were submitted on or before 24 January 2019. Where such plans are withdrawn or otherwise do not proceed to become part of the development plan, the policies contained in this Framework will apply to any subsequent plan produced for the area concerned. 221. **For the purposes of the policy on larger-scale development in paragraph 22, this applies only to plans that have not reached Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage at the point this version is published (for Spatial Development Strategies this would refer to consultation under section 335(2) of the Greater London Authority Act 1999).**	<u>Paragraphs 218 and 220</u> The change of wording is minor in nature and there are no implications for the NLWP. <u>Paragraph 221</u> The NLWP does not fall under the "larger-scale development" in paragraph 22 and therefore there are no implications for the NLWP.

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	[Changes to section on housing delivery test and neighbourhood plans]	
Annex 2: Glossary	**Design guide: A document providing guidance on how development can be carried out in accordance with good design practice, often produced by a local authority.** Green infrastructure: A network of multi-functional green ~~space~~ **and blue spaces and other natural features**, urban and rural, which is capable of delivering a wide range of environmental**, economic, health** and ~~quality of life~~ **wellbeing** benefits for **nature, climate,** local **and wider** communities **and prosperity**. Sustainable transport modes: Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, **ultra** low and ~~ultra low~~ zero emission vehicles, car sharing and public transport. [Changes to definition of housing delivery test, minerals, aggregates]	<u>Design guide</u> Outside the remit of the NLWP, therefore no implications for the NLWP. <u>Green infrastructure</u> While many types of green infrastructure are referred to in the NLWP, the term 'green infrastructure' is not referenced. Green Infrastructure is planned for in Local Plans rather than in the NLWP. The additional wording is not considered to affect the approach of the NLWP. This change has no implication for the NLWP. <u>Sustainable transport</u> There is the opportunity to update the wording in paragraphs 4.26 and 9.41 to better reflect the language in the NPPF. Proposed changes: 4.26 […]Policy 5 will seek to minimise such impacts where possible, for example through the use of **ultra**-low **and zero** emission vehicles. […] 9.41 […]The Assessment should cover the types of vehicles to be used, including opportunities to use

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		ultra-low **and zero** emission vehicles […]
Annex 3: Flood risk vulnerability classification	ESSENTIAL INFRASTRUCTURE • Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk. • Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including infrastructure for electricity supply including generation, storage and distribution systems; and water treatment works that need to remain operational in times of flood. • Wind turbines. • Solar farms HIGHLY VULNERABLE • Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding. • Emergency dispersal points. • Basement dwellings. • Caravans, mobile homes and park homes intended for permanent residential use. • Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be	This section has been inserted from the Technical Guidance to the National Planning Policy Framework and has already been considered as part of the flood risk assessment for the NLWP. This change has no implication for the NLWP.

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	located in other high flood risk areas, in these instances the facilities should be classified as 'Essential Infrastructure'.) MORE VULNERABLE □ Hospitals □ Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels. □ Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels. □ Non–residential uses for health services, nurseries and educational establishments. □ Landfill* and sites used for waste management facilities for hazardous waste. □ Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan. LESS VULNERABLE • Police, ambulance and fire stations which are not required to be operational during flooding. • Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in the 'more vulnerable' class; and assembly and leisure. • Land and buildings used for agriculture and forestry.	

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	• Waste treatment (except landfill* and hazardous waste facilities). • Minerals working and processing (except for sand and gravel working). • Water treatment works which do not need to remain operational during times of flood. • Sewage treatment works, if adequate measures to control pollution and manage sewage during flooding events are in place. • Car parks. WATER-COMPATIBLE DEVELOPMENT • Flood control infrastructure. • Water transmission infrastructure and pumping stations. • Sewage transmission infrastructure and pumping stations. • Sand and gravel working. • Docks, marinas and wharves. • Navigation facilities. • Ministry of Defence installations. • Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location. • Water-based recreation (excluding sleeping accommodation). • Lifeguard and coastguard stations. • Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and	

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	essential facilities such as changing rooms. • Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan. * Landfill is as defined in Schedule 10 of the Environmental Permitting (England and Wales) Regulations 2010.	