

## North London Waste Plan response to London Plan

The London boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest are working together on the North London Waste Plan. They are collaborating on this plan in their capacity as waste planning authorities. These comments on the draft London Plan are sent by the North London boroughs as waste planning authorities and deal with the waste aspects of the draft London Plan. This response is supplementary to wider responses on the draft London Plan from the constituent boroughs.

|   | Comment   | Suggested change |
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| <b>D policies</b>                               | <p>In D1 support for statements in 3.1.10 and 3.1.11 about circular economy principles in construction</p> <p>In D4 at 3.4.11 support the need for residential development to have recycling and waste disposal facilities in a convenient location to work for both residents and collection agencies – though this an issue for borough local plans.</p> <p>In D12 support introduction of agent of change principle which recognises impacts on existing business due to sensitive receptors being developed in close proximity.</p> |                  |
| <b>E policies</b>                               | <p>Noted that E4 Land for industry, logistic and services to support London’s economic function includes the need for waste management within the policy.</p> <p>Noted that waste uses continue to be supported under E5 SIL and Table 6.3 identifies the SIL sites for each borough which under this policy are considered suitable for waste uses..</p>   |                  |
| <b>Policy S13<br/>Energy<br/>Infrastructure</b> | <p>Support at B that energy masterplans for large scale developments should identify the possible opportunities to utilise energy from waste and at 9.3.7 the use of energy from waste is included as a renewable energy source where connected to a heat network.</p>  |                  |
| <b>Policy SI7<br/>Reducing waste</b>            | <p>Support emphasis on circular economy and work of London Waste and Recycling Board on the roadmap</p>   |                  |



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|       | <p>The target of 95% reuse or recycling for CD&amp;E is challenging. The figures for this waste stream demonstrate that a lot of tonnage moves around London as part of its management and a lot leaves London for management elsewhere and particularly the disposal of excavation waste in landfill in the wider south east. The Technical Report says that in 2015 3.7mt inert waste went to landfill in the wider south east (Task 2 para 2.4.2).</p> <p>The EU target for CD&amp;E is 70 % and excludes some soils and stones (excavation waste). The nature of excavation waste is that it is difficult to reuse or recycle. To achieve the 95% target with the inclusion of E waste would be extremely difficult and most likely impossible. It is therefore suggested that the target be linked to C&amp;D waste only</p>   | <p>Apply target of 95% reuse to Construction and Demolition waste only; the target should also refer to recovery as significant amounts of this waste are used in recovery and would not be captured through this target as proposed.</p>   |
| 9.7.4 | <p>The main policy approach of the London Plan to Construction, Demolition and Excavation (CD&amp;E) waste in London is set out in this paragraph:</p> <p>Amendments are proposed to bring this to greater compliance with National Planning Practice Guidance paragraph: 013 (Reference ID: 28-013-20141016) and to make a better response to the reality of CD&amp;E waste in London. At para 9.7.2, the London Plan states that CD&amp;E amounts to 9.7mt pa accounting for 54% of the waste stream in London. The amendments give greater clarity to what boroughs are required to do to ensure management of this waste stream.</p> <p>This para should cross-reference SI10 Aggregates policy. The approach to providing new facilities on aggregates sites should be through ancillary development, This would mean that such facilities would be temporary as they would be linked to the life of the quarry, This is an important point that needs to be picked up as quarries tend to be within the greenbelt</p> | <p>To achieve the target, boroughs should: collect baseline information on CD&amp;E waste removed from their area and the facilities that manage it; require. Boroughs should require <del>A combination of</del> mobile facilities on construction sites, as part of Circular Economy Statements and Construction Management Plans; supported by temporary sites for recycling and processing waste in to re-useable products for the duration of construction phase. Boroughs should safeguard <del>effective use of</del> existing construction waste transfer and processing sites and encourage more effective use of these facilities moving them towards recycling and re-use. Boroughs should enable use, where appropriate, of safeguarded</p> |

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|                                      | <p>and any built waste development for recycling facilities would not be considered appropriate in such locations.</p> <p>In addition there are a large number of current or impending infrastructure projects such as HS2 and Crossrail2 that, notwithstanding reuse targets set by regulators, will generate large amounts of excavation material which are likely to end up in landfill. The Mayor should require that attention is paid to the end use of the excavated material at the project inception stage. As any landfill site could be outside London this is a strategic issue for the Mayor to raise with the Wider South East authorities.</p> | <p>wharves, as well as the provision of recycling facilities at aggregate extraction sites, <b>in line with policy SI10</b>. This should be capable of meeting the anticipated future requirement within London to achieve a more beneficial re-use of this material.</p> <p><b>When large infrastructure projects are proposed, such as Crossrail2, the Mayor will ensure that through the supporting environmental statement that the best environmental option practicable for the management of these materials is used</b></p> |
| 9.7.5                                | <p>Exports: Under 9.7.4 an amendment is proposed that potentially deals with export of waste by large infrastructure projects. This paragraph is understood to deal with the responsibility, under the duty to co-operate, of London Boroughs to liaise with other authorities who receive waste from their area. This will be done at the plan making stage and so an amendment to the paragraph is proposed.</p>  | <p>9.7.5 When it is intended to <b>export waste</b> to landfill outside of London, it will be important <b>for boroughs</b> to show that the receiving <del>authority</del> <b>authorities</b> <b>has</b> the capacity to deal with waste over the lifetime of the <del>development</del> <b>local plan</b>. This will also help receiving authorities plan for future needs.</p>   |
| 9.7.6                                | <p>Last sentence of 9.8.17 should be here because it links better to SI7 B 4) on requiring adequate storage capacity for waste and recycling. The design guide referred to particularly focuses on flats but it should be made clear that the requirement is for all types of housing and commercial and industrial development.</p>  | <p><b>Developers should refer to the London Waste and Recycling Board’s design guide for ensuring adequate and easily accessible storage space for high-rise developments, see part G of Policy D4 Housing quality and standards.</b></p>   |
| <b>Policy SI8<br/>Waste capacity</b> | <p>General – inconsistent use of words<br/>This policy refers to <i>waste management sites</i> at A2, A4 and 9.8.8 but to <i>waste sites</i> at D. Policy SI9 refers to <i>waste sites</i> in its title, in A and in</p>  | <p>A2, A4, 9.8.8<br/>waste <del>management</del> sites</p>  |

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| <b>and net waste self-sufficiency</b> | 9.9.1. As <i>waste deemed to be managed</i> has a specific meaning in the London Plan (see 9.8.4) the use of the term <i>waste site</i> is preferred as in: A waste management facility is located on a waste site.   |   |
| A                                     | <p>The policy says that London should aim to be net self-sufficient in all waste streams. However as argued under 9.7.4 above, London will struggle to be net self-sufficient if that includes excavation waste. London lacks adequate landfill sites and so much of this waste is likely to continue to be exported to landfills outside London.</p> <p>At A3) the policy says that capacity of existing sites should be “<i>optimised</i>”. There is no explanation of this in the text and it is an odd choice of words that leaves out any mechanism of change. It also suggests that there is an optimal capacity for any given site which is a questionable assumption. Existing waste sites are mainly operated by private contractors and outside the control of boroughs. Boroughs do not have the authority to require operators to increase their capacity if they do not wish to do so.</p> | <p>State that target for net self-sufficiency applies to household waste, commercial and industrial waste and construction and demolition waste but not excavation waste.</p> <p>Reconsider the assumptions behind A3</p>   |
| B                                     | <p>The emphasis on waste reduction is welcomed in principle as it is at the top of the waste hierarchy but there are no further examples of what is expected here. For example the Mayor’s waste projections already include a factor for waste reduction . If boroughs can identify ways to reduce waste does this mean they don’t need to meet the full apportionment targets?</p> <p>SI8 B 3a refers to Locally Significant <u>Employment</u> sites but 9.8.8 and policy E5 talk about Locally Significant <u>Industrial</u> Sites (LSIS)</p>  | <p>Add text under policy outlining examples of types of waste reduction expected or possible and how this can be delivered through land use planning</p> <p>b) Strategic Industrial Locations and Locally Significant <del>Employment</del> Industrial Sites / land</p> |
| B                                     | <p>There is no requirement on boroughs to deal with non-apportioned waste streams in the London Plan while NPPW/NPPG clearly sets out seven waste streams that waste planning authorities need to plan for. A new requirement is proposed to cover this.</p>  | <p>SI8 B<br/>Development plans should<br/>4) set out how construction, demolition and excavation waste and hazardous waste will be managed</p>  |

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|   | <p>In B2) and B3) the policy emphasises finding locations only for <i>apportioned waste</i>, covering two waste streams. As many waste sites can handle all three major waste streams, it is not possible to identify what amount of apportioned waste only could be handled at these sites. If it is assumed the full capacity then this would not be an accurate representation of available capacity and management of apportionments.</p> <p>There needs to be some information as to the locations for managing other waste streams. Policies E4 to E6 talk about industrial locations being suitable to manage waste, but does not restrict that to apportioned waste as is the case here. This policy needs to state that these locations are suitable for all waste streams.</p> | <p>B3_identify the following as suitable locations to manage <del>borough</del> waste <del>apportionments</del></p>  |
| C | <p>5) CD&amp;E managed on site: this is welcomed, however there is no reference in text below as to how this is to be achieved or how it will be monitored. The policy intention would be strengthened if this was linked to the circular economy statements and the requirement for boroughs as regards achieving the C&amp;D targets. However it will be difficult to collate any information in order to monitor this. If CD&amp;E does not leave the site it does not become waste and we have no knowledge of how much was produced.</p>  | <p>Add text below policy as suggested</p>  |
| D | <p>While jobs and skills are important for any employing organisation to provide, there should be no greater requirement for waste developments on job and skills than for any other employment type.</p> <p>Similarly, the requirements on transport should not be restricted just to waste development but movement of materials/freight. There is no reason for different controls for vehicle movements accessing a waste site that for accessing any industrial site. For example, distribution centres are likely to have far greater movements of vehicles, are there similar requirements placed on those types of development?</p>  | <p>GLA to clarify that there are no greater restrictions placed on waste operators than any other form of development in terms of vehicle movement and jobs and skills</p> |

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| <p>Table 9.1</p> | <p>Waste arisings methodology: GLA is pursuing the wrong approach towards working out the Commercial and Industrial (C&amp;I) waste arisings that will underpin the London Plan and the new apportionment for the boroughs.</p> <p>We consider that the GLA’s proposed approach is based on an out of date survey, and uses a method that is no longer used by waste planning authorities elsewhere. As a result there is a danger of overestimating the amount of C&amp;I waste that boroughs will have to plan for and being out of step with other waste planning authorities in the wider south east.</p> <p>The proposed approach to estimating levels of C&amp;I waste by the consultants for the GLA adopts the findings of the Jacobs report <i>“Commercial and Industrial Waste Survey 2009, Final Report, May 2011”</i>. The findings of the study are based on data collated in 2009, which is now 8 years out of the date.</p> <p>In February 2015 Defra withdrew the 2009 study and an alternative approach to identifying and predicting arisings for C&amp;I waste has been published. The current approach being used by authorities across England is based on the Defra Report <i>“New Methodology to Estimate Waste Generation by the Commercial and Industrial Sector in England”</i> published in August 2014. This latest approach is not a survey based approach as with the 2009 survey, and when comparing the 2009 study findings with data captured through the new approach, the results for 2009 were 21% lower than that reported.</p> <p>The latest approach uses current published data and data which is available on request from the Environment Agency. This means that it will only report on waste that enters the system and will enable an analysis to</p> | <p>GLA to carry out an analysis of C&amp;I waste in line with the 2014 Defra report</p> |
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|           | <p>be obtained based on the latest available data. Examples of applying this process have shown that the arisings levels are lower than that realised thorough the extrapolation of data from the 2009 survey. This appears to be in line with the findings of previous studies which have also shown declines in this waste sector.</p> <p>Therefore, by adopting the approach based on the 2009 survey for the waste data in the London Plan , there is a real concern that the levels of C&amp;I in the London Plan will be higher than are actually being managed and this will require authorities to identify opportunities to manage more waste than is necessary. It is already proving difficult in a number of boroughs to identify locations for waste development; however there is a danger that across London there will be an overprovision of sites in an area where availability of land is scarce.</p> <p>We therefore suggest that the GLA request their consultants to carry out an analysis of C&amp;I waste in line with the latest published approach to allow a comparison to be made between both approaches to ensure that what is being planned for matches what is required.</p> <p>In North London, our own estimates of C&amp;I for 2016 are around 300,000 tonnes less using the new method than the approach adopted in the London Plan.</p> |  |
| Table 9.3 | Table 9.3 is misleading. Either it should be called “net” exports or projections of imports ought to be included   | Rename Table 9.3: “Projected <u>net</u> exports of Household and Commercial & Industrial waste from London (000’s tonnes)” |
| 9.8.3     | The Mayor needs to monitor progress by boroughs in identifying sufficient sites to manage 100% of the waste apportioned to the boroughs.   | Commitment to monitor the achievement of managing apportioned waste.   |



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| 9.8.4   | Welcome addition of production of SRF and RDF to definition of waste deemed to be managed in London  |  |
| 9.8.6   | The changes to the methodology to working out the apportionment as set out in Technical Report Task 4 are noted.   |  |
| 9.8.7   | <p>There is confusion in the policy about “identification” and “allocation” and between “land”, “sites” and “areas”.</p> <p>Recent experience in London and the rest of England demonstrates that few landowners and operators put forward sites for waste use as part of a call for sites. As a result it is increasingly necessary for planning authorities to <i>identify areas of search</i> in which suitable sites for waste use may come forward. It would not be reasonable therefore for the Mayor to insist on the <i>allocation of sites</i> to demonstrate that there is sufficient amount of land allocated to future waste management.</p> <p>The policy approach is reasonable. Under SI8B) Development Plans should “<i>allocate sufficient land and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste...</i>”,</p> <p>In 9.8.6 the Plan correctly identifies that the land could take the form of <i>sites and/or areas</i>: “Part B.2 of Policy SI8 Waste capacity and net waste self-sufficiency requires boroughs to allocate sufficient land (<i>sites and/or areas</i>) and identify waste management facilities to provide the capacity to manage their apportioned tonnages of waste.”</p> <p>However in 8.8.7 the supporting text changes to talking mainly about <i>sites</i> and therefore needs to be amended as shown.</p> | <p>Boroughs should examine in detail how capacity can be delivered at the local level through <del>site allocations</del> <u>the identification of suitable land</u> in Development Plans to meet their apportionments, and should aim to meet their waste apportionment as a minimum. However, this may not always be possible and boroughs will need to agree the transfer of apportioned waste. Boroughs should identify suitable additional sites for waste including waste transfer sites where practicable, <u>or otherwise areas of search.</u></p> |
| General | “Secondary materials” is used often within the waste section and elsewhere in London Plan. There should be a definition in the glossary.   | Add entry for secondary materials in glossary  |

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| 9.8.7  | “Boroughs will need to agree the transfer of apportioned waste”. Not sure how this will work. Is this different from pooling apportionment.   |   |
| 9.8.7  | The supporting text states that <i>“Mayoral Development Corporations should cooperate with boroughs to ensure that the boroughs’ apportionment requirements are met. This could be widened to cover boroughs in the relevant waste disposal authority.”</i> Seven North London Boroughs have joined together to plan for waste. Parts of two boroughs fall within a MDC and it would be helpful if the last sentence replaced “could” with “should” and also made clear the MDC has a responsibility for helping to meet, not just the apportionment to its host waste planning authorities, but also of the other waste planning authorities with whom the host waste planning authorities may have pooled their apportionment in a joint waste planning group. An alternative wording that brings the two sentences together is proposed. | <del>“The Mayor will ensure that</del> Mayoral Development Corporations <del>should</del> cooperate with <del>their</del> boroughs <del>in waste planning collaborations where apportionments have been pooled</del> to ensure that the boroughs’ apportionment requirements are met. <del>This could be widened to cover boroughs in the relevant waste disposal authority.”</del> |
| 9.8.8  | Text says “Large-scale redevelopment opportunities and redevelopment proposals should incorporate waste management facilities within them.” It is not clear if this applies to all large-scale redevelopment opportunities or just those within SILs/LSIS. It is also not clear what type of waste it should deal with, what capacity is required, if the developer needs to seek a waste operator partner to deliver a waste facility, if the developer needs to identify the feedstock, or if the developer just needs to provide space for a waste facility. If just space – how much? What if a waste facility isn’t viable/deliverable on a particular large-scale redevelopment – commuted sum?   |   |
| 9.8.10 | The last sentence will be superfluous in the final version of the plan.   | <del>For a fuller discussion of the issues around CD&amp;E data see the SLR consulting report (task 2) (May 2017).</del>  |
| 9.8.15 | This is the main mention of hazardous waste in the waste section. As this paragraph sets out a requirement on boroughs to work with neighbouring authorities to consider the necessary facilities, and because boroughs   | SI8 B<br>Development plans should   |

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|   | <p>have to plan for hazardous waste under the NPPW/NPPW, either this requirement should be in the policy or linked to the suggestion above for new SI8 B 4)</p> <p>It would be helpful if the GLA produced more guidance on the scale and type of facility required and locations considered suitable for such facilities. Update previous paper Previously the GLA undertook a study of hazardous waste facilities in London and it would be useful if this could be updated.</p> | <p>4) set out how construction, demolition and excavation waste and hazardous waste will be managed</p>   |
| 9.8.16  | <p>This should be linked to design policies earlier in section 3 of the London Plan. There can often be no difference to a built waste facility in an industrial location than any other general business activity. The Mayor needs to be clear that criteria are similar for other industrial activities.</p>   | <p>Link to design policies and ensure fair approach to requirements placed on waste facilities in line with other industrial uses.</p>  |
| 9.8.17  | <p>Last sentence re storage standards does not relate to any policy statement in SI8. This sentence should be moved to 9.7.5 linked to circular economy statements and SI7 B 4)</p>  | <p><del>Developers should refer to the London Waste and Recycling Board's design guide for ensuring adequate and easily accessible storage space for high-rise developments, see part G of Policy D4 Housing quality and standards.</del></p> |
| <b>Policy SI9<br/>Safeguarded<br/>waste sites</b> | <p>The policy should go further to protect existing waste facilities from non-waste development making it clear that it is not just protecting against loss when sites are displaced but also the impact on the operation of existing sites when non waste uses affect their operation. This picks up the agent of change principle.</p>   | <p>Link to agents of change policy to ensure same considerations apply to waste facilities</p>  |
| A   |  |   |
| B   | <p>This is an important principle and should be further developed in text below the policy</p>   | <p>Add explanatory text about principle of integrating waste uses in an area of non-waste development.</p>  |
| C   | <p>Where capacity is lost and displaced to another borough, the apportionment of waste should be reviewed to consider the local effects on this change in capacity .</p>   |   |

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| 9.9.2                             | Should be throughput over five years to get a better average  | When assessing the throughput of a site, the maximum throughput achieved over the last <del>three</del> <u>five</u> years should be used.  |
| 9.9.3                             | This paragraph contradicts policy SI9 and 9.9.2. Since the apportionment system depends on all boroughs meeting their apportionment, a surplus in one borough may be a deficit in another borough. In any case, it seems extremely unlikely that any waste site could be released without capacity re-provision unless London's net self-sufficiency target has been met, assuming "elsewhere" means "in London".                 | If such increases are implemented over the Plan period, it may be possible to justify the release of waste sites without capacity re-provision if it can be demonstrated that there is sufficient capacity available <u>elsewhere in London</u> at appropriate sites over the Plan period. In such cases, sites could be released for other land uses. |
| <b>Policy SI10<br/>Aggregates</b> | The approach to providing new facilities on aggregates sites would be through ancillary development, This would mean that such facilities would be temporary as they would be linked to the life of the quarry, This is an important point that needs to be picked up as quarries tend to be within the greenbelt and any built waste development for recycling facilities would not be considered appropriate in such locations. |  |
| <b>9.10.5</b>                     | See above. A better understanding of quarry restoration and controls in the greenbelt are required in relation to this paragraph's statement about use of old quarries .  |  |
| <b>Policy M1<br/>Monitoring</b>   | The Mayor needs to commit to monitor waste management in London to see if the targets are being met. There are currently no waste or recycling indicators.  | Add commitment to monitor <ul style="list-style-type: none"> <li>• Arisings across major waste streams</li> <li>• Achievement of targets</li> <li>• Imports and exports</li> <li>• Net self-sufficiency</li> <li>• Circular economy statements</li> </ul>  |