

Old Oak and Park Royal Local Plan Examination

Written Statement Prepared by the London Borough of Ealing

Hearing Week 1

Matter 2 – Positively Prepared

19) In the light of new draft London Plan waste apportionment targets; has the OPDC LP been positively prepared?

We do not consider that the approach to planning for waste needs is sound in terms of paragraph 182 of the NPPF (2012) as follows:

- In particular the policies in the plan relating to waste have not been **positively prepared** failing to establish and respond to the infrastructure requirements of the area, and notably the need for waste management facilities. Specifically, national waste policy (National Planning Policy for Waste (NPPW), October 2014) advises that waste planning authorities should prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of (all) waste streams. The plan and evidence underpinning it fails to establish the current and future needs of the area for waste management facilities, relying instead on targets in the adopted London Plan and the outdated evidence underpinning these targets, which predates the establishment of the OPDC.
- Secondly the plan is not **justified**, as it has not been prepared based on proportionate evidence. The National Planning Policy for Waste (2014) advises that in preparing their Local Plans, waste planning authorities should ensure that their plans are based on a robust analysis of the best available information. No evidence is provided to demonstrate that the OPDC has attempted to establish the need for waste management facilities arising from the plan.
- Thirdly the plan may only be **effective** for a very limited period, with an early review likely being triggered once the new apportionment targets are approved in the new London Plan. For a plan to be effective, it must be necessary to demonstrate that its policies can endure for a meaningful period of time, before triggering the need for a review. The OPDC's unwillingness to accept an apportionment share also inhibits Ealing's ability to implement the London Plan policy and as a consequence the London Plan policy is also not effective.
- Fourthly, as detailed above there is no evidence to indicate that the local plan has had regard to national waste policy, with the OPDC responding only to the adopted regional apportionments, and the plan therefore is not **consistent with national policy**.

Ealing has submitted comments at each stage of the plan preparation, in March 16 (Reg 18), September 2017 (Reg 19 first draft) and July 2018 (Reg 19 second draft). These earlier comments have consistently addressed our concern with the waste policy (EU6 in particular). Our principal concern remains that the policy has failed to properly grapple with the challenge, choosing to respond only to the current London Plan apportionments, rather than the emerging apportionments in the draft London Plan. Specifically clause a) of policy EU6 safeguards only existing and allocated sites identified through the WLWP, and the existing Old Oak Sidings site in Hammersmith & Fulham. It should be noted that the apportionment figures in the current adopted London Plan (2016) were fixed through the adoption of FALP in March 2015. The modelling/forecasting carried out to inform these apportionments was completed in 2013 (published January 2014) utilising waste arising data from 2012/13 and 2009 for Household and C&I waste respectively. Significantly then the original apportionments in the adopted London Plan are underpinned by evidence which predates the

establishment of the ODPC, and accordingly the significant growth/change planned in the area has not properly (if at all) factored into the calculations used to arrive at the adopted apportionments.

In December 2017 new apportionment targets were published in the draft New London Plan. These revised apportionment figures are underpinned by more recent data around future arisings, and a revised apportionment methodology which significantly alters how need (arisings) are assigned to boroughs to manage.

For Ealing the new apportionment targets represent a significant uplift on the current apportionment figures in the Consolidated London Plan (published in 2016, although originally fixed in March 2015 as part of FALP). A comparison of the figures for 2021 illustrates the significance of this change for Ealing, with the revised figure increasing to 543,000 tonnes from 291,000 tonnes in the current London Plan (an 86% increase).

At present the apportioned need for Ealing identified through the current London Plan is satisfied through the Joint West London Waste Plan (2015), which both Ealing and the OPDC have adopted. As noted above the OPDC Local Plan carries forward those sites identified for safeguarding in the WLWP and accordingly if adopted it would also satisfy the current London Plan apportionment. The Joint West London Waste Plan was prepared in accordance with the apportionment figures contained in the then current 2011 London Plan, although at the time of examination regard was also had to the revised figures in the emerging FALP (2015). Significantly these targets were adjusted downwards.

Whilst some contingency (in terms of identified capacity) therefore exists in the WLWP relative to the current London Plan apportionments, against the new and significantly higher targets insufficient sites are now either allocated or safeguarded within the WLWP or the ODPC's Local Plan. Merely safeguarding the WLWP sites through policy EU6 fails to address the challenge as we now understand it.

Ealing has separately submitted representations to the GLA on the draft New London Plan (NLP) in respect of the waste apportionments and intends to give evidence on these matters at their forthcoming EIP. Further detail is contained in our hearing statement to the NLP in appendix 1. In summary Ealing has set out its case as to why the new apportionment targets should be set for all authorities including the Mayoral Development Corporations. As currently calculated the revised apportionments have been determined based on the administrative boundaries of the boroughs and not the amended boundaries of the LPAs, and thus the MDCs are not assigned their own apportionment. Despite the transfer of planning responsibilities to the OPDC in April 2015, the land now falling within the OPDC's jurisdiction continues to determine Ealing's percentage share of the apportionment. The single biggest factor determining this percentage share is the amount of industrial land, as such areas are deemed to have greatest potential to accommodate waste management facilities. Ealing as a borough accommodates a significant quantum of industrial land, which explains why it has been assigned the largest apportionment share of all boroughs in London. Based on designated industrial land (SIL & LSIS), Park Royal comprises the borough's largest single concentration of employment land accounting for 42% of Ealing's supply of designated land. Although we have not been able to access all of the datasets utilised to determine the revised apportionments, and disaggregate them by the LPA areas, it is clear to us that the apportionment percentage for the Ealing LPA area only would be significantly reduced. Conversely the apportionment percentage for the OPDC's area would be considerable.

Assessing Ealing's capacity by factoring in land in Park Royal is clearly flawed as it puts Ealing Planning Authority in an impossible position. Our ability to plan for this apportionment through utilising a significant area of this land to accommodate future waste facilities now no longer exists following the transfer of plan making powers to the OPDC.

The ability to utilise this capacity and to allocate new waste sites in this area now resides solely with the OPDC. The GLA's approach to assigning the apportionment is fundamentally flawed, informed by (and its delivery contingent on) opportunities which now sit beyond the LPA's control. In our view, and as detailed in our statement at appendix 1, the London Plan policy and apportionment cannot be effectively implemented in light of the geographical application of the revised apportionment methodology.

The GLA's decision to not assign an apportionment to Mayoral Development Corporations has been clearly influenced by input from the OPDC, who support the GLA's approach. As detailed above and within our statement at appendix 1 we do not accept the reasoning for this approach/decision. We note that the draft new London Plan recognises the OPDC as a separate entity in relation to other key policy areas, where separate targets are set for the MDCs, for example in relation to housing and the management of industrial land, and yet they choose not to do this for waste. The effect of a lack of an apportionment for OPDC, and the consequent failure to plan positively for OPDC's needs is to prevent effective plan making in Ealing, Brent and LBHF because it makes the existing Borough apportionments meaningless and undeliverable. This sits against a background of an already flawed London Plan approach to borough industrial needs which assumes that net requirements can be met exclusively through intensification of existing sites but declines to evidence how this will be achieved.

In light of our compelling evidence we believe there is a strong possibility that the GLA will have to rectify this position in the London Plan, assigning apportionments to all authorities including the MDCs. This could have serious implications for the OPDC Local Plan.

Assuming the OPDC Local Plan is adopted ahead of the London Plan, with the London Plan being adopted shortly thereafter, policy EU6 of the OPDC Local Plan will be out of date almost immediately triggering the need for an early review. As it stands the supporting text (para. 6.73) of policy EU6 recognises the possibility of this eventuality, indicating that a review of this policy may be necessary. In our view this represents a poor starting point, and to demonstrate that a policy is effective the OPDC should be able to prove that it will endure for a meaningful period of time before it is necessary to trigger a review.

Notwithstanding the GLA's decision to not currently allocate an apportionment to the OPDC, it is not sufficient to only have regard to regional policy when formulating Local Plan policies on waste. In particular, the presence or absence of an apportionment either in the adopted or emerging London Plan, does not eliminate the need to plan for the waste needs of the area. Specifically national policy (National Planning Policy for Waste, October 2014) advises that waste planning authorities should prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of (all) waste streams (para. 3), and such planning should be based on a robust analysis of the best available information (para. 2). The OPDC has prepared a number of supporting documents in respect of waste, most notably SD26 'Waste Apportionment Study', and SD29 'Waste Technical Paper'. The scope of SD29 is limited only to the land within the OPDC's boundary which falls within the LBHF, and therefore contains no evidence for the remainder of the OPDC's land falling within the boroughs of Brent and Ealing, and accordingly does not establish the existing or future needs of the area in respect of waste. Whilst the geographical scope of SD26 'Waste Apportionment Study' is more relevant covering the OPDC's land within the boroughs of Brent and Ealing, it merely references the need to satisfy the apportionment targets in the adopted (2016) London Plan. As noted above the evidence underpinning the apportionment targets in the current London Plan, predated the establishment of the OPDC, and we understand that the growth/change planned in the area has not properly (if at all) factored into these apportionment calculations. Given the scale of change planned for the OPDC's area, involving significant intensification, the scale of need

for infrastructure such as waste facilities is also correspondingly significant. Despite this position, there is no evidence that any analysis has been undertaken to forecast/model the future needs of the area for waste infrastructure. The reliance on dated evidence and the lack of any new evidence does not represent a proportionate response. Evading the issue through deferring the challenge (to the near future), or deflecting responsibility to the joint waste plan and the host boroughs, does not adequately respond to the task presented by the revised arisings/apportionment, or the changing infrastructure needs of the OPDC's area. In our view the plan does not therefore satisfy the requirements of national policy. This would require the OPDC to take proactive action to first establish need and then to plan for it accordingly. At the very least it needs to establish the need and then identify a framework for how it will meet this requirement. Whilst it is essential that the OPDC can demonstrate how it will satisfy the organic needs generated within its own area, the plan also needs to look beyond its own needs, as required through national waste policy (para. 3), and reflecting the core principle of sharing responsibility underpinning the apportionment approach in the London Plan. As a starting point the Local Plan and evidence underpinning it should have started to evaluate what contribution the area can make to satisfying these wider needs. Whilst the Council recognises that the decision to assign an apportionment to the MDCs now rests with the GLA, this position does not prevent the OPDC from establishing what its share of the boroughs apportionment is (through disaggregating this data), and so it is particularly disappointing that this has not been done.

Ealing has consistently raised the above issue with the OPDC (and separately with the GLA) since the Regulation 18 draft stage (March 2016) of the Local Plan and so there has been ample time to properly grapple with the challenge, and so it is particularly frustrating that this situation still remains unresolved. Whether or not the London Plan ultimately assigns a waste apportionment to OPDC this part of the Local Plan is clearly unsound in relation to national policy and requires an immediate partial review to properly assess and plan for OPDC's considerable waste needs, and the strategic role it can play in meeting the wider needs of London in achieving self-sufficiency in waste management.

Appendix 1 -

Draft London Plan: Examination in Public

Written Statement Prepared by the London Borough of Ealing (2540)

Matter 69 - Waste

M69. Would Policy SI8 and SI9 provide a justified and effective approach to providing for London's waste and promoting net waste self-sufficiency? In particular:

- **a) Is the target of net self-sufficiency by 2026 as set out in Policy SI8A1 realistic? What is the justification for excluding excavation waste within the net self-sufficiency target? In light of this would it be justified?**

We have no comments.

- **b) Are the Borough forecast arisings of household and commercial and industrial**

waste as set out in table 9.1 based on robust evidence? What waste streams are excluded and what is the justification for excluding them? In light of this are they realistic and justified?

No comments.

- **c) Is the apportionment of waste to be managed in Boroughs, as set out in table 9.2, justified? What waste streams are excluded from the apportionments and what are the provisions to deal with those waste streams? As some waste streams are not included would the apportionments be effective in ensuring that the waste targets in Policies SI7 and SI8, the Borough apportionments in table 9.2 and the aspirations for net self-sufficiency and shifting towards a low carbon circular economy would be met?**

No. We do not consider that the approach to assigning the apportionments is sound in terms of paragraph 182 of the NPPF (2012) as follows:

- Specifically the approach to determining the apportionments are not **Justified** when considered against the reasonable alternatives. Notably the decision to determine the apportionments based on the administrative boundaries of the boroughs as opposed to the boundaries of the Local Planning Authorities (LPAs) departs from the approach taken in relation to other areas of target setting in the draft new London Plan, and this decision is not evidenced or justified.
- Moreover, in light of the geographical application of the revised apportionment methodology, which has created a disconnect between a borough's responsibility and its powers, the borough apportionments cannot be **effectively** implemented, and the targets for Ealing specifically are not deliverable. The GLA's approach to assigning the apportionment is fundamentally flawed, informed by (and its delivery contingent on) opportunities which now sit beyond the LPA's control.

The new London Plan updates the borough apportionment figures and this is underpinned by more recent data around future arisings, and a revised apportionment methodology which significantly alters how need (arisings) is assigned to boroughs to manage.

For Ealing the new apportionment targets in Table 9.2 represent a significant uplift on the current apportionment figures in the Consolidated London Plan (2016). A comparison of the figures for 2021 illustrate the significance of this change, with the revised figure increasing to 543,000 tonnes from 291,000 in the current London Plan (an 86% increase). This uplift has also been evident across west London with the West London Waste Authority area experiencing a 62% increase. In the context of other significant policy changes for Ealing and the wider west London sub region, this presents a significant challenge.

At present the apportioned need identified through the current London Plan is satisfied through the Joint West London Waste Plan (2015) which Ealing is party to. The Joint West London Waste Plan was prepared in accordance with the apportionment figures contained in the then current 2011 London Plan, although at the time of examination regard was also had to the revised figures in the emerging FALP (2015). Significantly these targets were adjusted downwards.

Whilst some contingency therefore exists in the plan relative to the current London Plan apportionments, against the new and significantly higher targets insufficient sites are now either allocated or safeguarded, whether viewed individually as a borough, or collectively. Ealing is therefore expected to manage significantly more waste than it had planned for previously, and this will mean that there will be a need to identify and allocate new sites. Whilst previously the West London authorities have chosen to pool their apportionments and respond jointly, how the authorities will respond to the revised apportionment targets has yet to be determined at the sub-regional level.

The apportionment methodology has essentially sought to re-assign the projected arising

figures based on a Borough's suitability and capacity to accommodate waste facilities. The revised methodology scores the performance of a borough against seven criteria, with these scores representing a relative 'Apportionment Percentage' (AP). Whilst Ealing welcomed some of the revisions introduced through the revised apportionment methodology, there remains fundamental concerns with the geographical application of this methodology, which Ealing raised during the initial consultation on the revised apportionment methodology in Spring 2017.

Specifically, the decision to determine the apportionments based on the administrative boundaries of the borough as opposed to the amended boundaries of the LPAs is fundamentally flawed. This is of particular significance to Ealing, as the planning powers for part of the borough (Park Royal) transferred to the OPDC in April 2015. Despite this change in planning responsibilities, the land now falling within the OPDCs jurisdiction continues to determine Ealing's Apportionment Percentage. Despite accounting for only 5% of the area of the borough, the presence of Park Royal has disproportionately driven up the borough's apportionment.

Of particular significance is Criterion 1, which is designed to allocate a greater apportionment to those Boroughs which are considered to have greater capacity to accommodate additional waste management capacity, based on the provision of existing facilities and the extent of land in those Boroughs which are potentially suitable for accommodating waste management facilities. The latter is probably the single most important factor for criterion 1, and potential future capacity is determined based on how much land in the Borough is currently categorised as falling within a core industrial type use. Ealing (borough) has been assigned the joint largest apportionment percentage for this criterion because it already accommodates a large industrial baseline, although importantly it should be noted that the existing industrial baseline is not evenly distributed across the borough. These areas ('suitable industrial land') are mapped in the methodology report (figure 2 – NLP/SI/006), and whilst we have been unable to access the layers to precisely quantify their extent, it is evident that a considerable proportion of this industrial land within the borough is located within Park Royal.

To illustrate this point, based on designated industrial land (SIL & LSIS), that part of Park Royal now managed by the OPDC but located within Ealing, comprises the borough's largest single concentration of employment land, accounting for 42% of Ealing's supply of designated land. If the calculations were done separately based on the LPA boundaries, the apportionment percentage for Ealing LPA would reduce considerably for this criterion. The impact is not just limited to criterion 1 however, as this measure also factors in the calculations for other criteria too where it is combined with other datasets but forms the denominator (namely Criteria 5 and 6), and thus magnifies the extent of the problem. For example, in relation to criterion 5 the assessment of the incidence of environmental constraints is limited only to those core industrial areas identified through criterion 1, which as demonstrated above Park Royal accommodates a significant proportion of Ealing's identified 'suitable industrial land'. The same approach is also true of criterion 6 'flood risk'. The spatial extent of the 'Suitable industrial land' also factors in other criteria (3 and 7), where a 1km buffer from such areas is deployed.

Although the implications of this decision disproportionately impact on criteria 1, 5 & 6, and the assessment of the other criteria are not confined to the spatial extent of the 'suitable industrial areas', the assessment of these other criteria do still nonetheless also factor in land within Park Royal. These results are therefore flawed too. For example, Criterion 3 seeks to assign a higher apportionment value to Boroughs with the ability to transport waste via sustainable modes of transport utilising the number of railheads as a measure. Within Ealing a number of these railheads (3) are located within Ealing's corner of Park Royal (now covered by the OPDC), and thus bumping up Ealing's own 'Apportionment Percentage'

against this criterion to 7.4%. Ealing's borough apportionment therefore essentially represents an aggregate of the two LPAs. Were the calculations done separately based on the LPA boundaries, the 'apportionment percentage' for Ealing would be 4.6%, which represents a significant difference.

As we have not been able to access all of the datasets utilised by SLR in their calculations, and disaggregate them accordingly by the LPAs area, we have not been able to recalculate the apportionment percentages for each of the criteria and determine the overall apportionment share for the Ealing LPA area only. It is clear to us however that this percentage would be significantly reduced. Conversely the apportionment percentage for the OPDCs area would be considerable.

Briefly returning to criterion 1, there are also issues with the reliability of the datasets informing the calculations. One of the main datasets informing the apportionment calculations is the amount of industrial land in each borough deriving from the 2015 Industrial Land and Economy Study. This was considered to be the best available data to approximate potential land to accommodate waste uses. Whilst it is accepted that it should provide a good starting point, there are issues with the reliability of this data. In preparing the Industrial Land and Economy Study the authors of this study shared with us the baseline data, and we were tasked with verifying this data. Unfortunately we were expected to complete this exercise in 2 weeks, which for a borough with a geographically large baseline (567ha), was far from adequate. Given the limited time available to complete this exercise, we therefore had to be selective in making updates. Fortunately in the case of Park Royal we were able to refer the consultants to the then recently published Park Royal Atlas which contained an up to date and fine grained audit of the area. For other areas however the data and particularly the categorisation of uses in the baseline was much less fine grained and therefore less reliable. Even at the scale shown, this is evident in the map at figure 2 of the methodology report. Where better info existed locally (as was the case with Park Royal) it was evident that the original categorisation of land against the industrial categories had been done fairly crudely. For example, uses in multiple ownership and covering multiple activities have been lumped into a single industrial use category, despite comprising a broader range of uses. This has presented a particular issue in this instance as only land categorised as 'core industrial uses' factor in the apportionment calculation, and yet it is probable that some of this land is in fact in a non-core 'wider industrial use'. The implication of this is that figures (with the exception of the Park Royal area) may have overestimated the amount of land deemed to be suitable.

- Returning to our key point, assessing our capacity by factoring in land in Park Royal is clearly flawed as it puts the LPA in an impossible position. Our ability to pro-actively plan for this apportionment through utilising a significant area of this land to accommodate future waste facilities now no longer exists following the transfer of plan making powers to the OPDC. The ability to utilise this capacity and to allocate new waste sites in this area now resides solely with the OPDC. To assign (through the apportionment) this responsibility to Ealing is clearly neither justifiable or deliverable.
- The implications of this are not unique to Ealing, potentially affecting other neighbouring boroughs too. For the apportionment model to work effectively it is key that all LPAs with potentially suitable land capacity take a share of the demand and accordingly the Mayoral Development Corporations should be assigned their own apportionment.
- Whilst the consultation summary (appendix 2 – NLP/SI/006b) notes our previous representations on these crucial points, it merely advised that the GLA had confirmed that they were not currently planning to allocate an apportionment to the MDC and no further explanation was given for this decision. This is wholly inadequate and

unsound as the approach taken has not been justified.

- Although this justification is missing from the report we are aware that one of the reasons cited for not assigning an apportionment to the MDCs is that, unlike other established areas, it is difficult to arrive at an arising figure for the planned area, and that it would be overly complex to disaggregate the OPDC from the rest of the Borough areas in terms of datasets. Moreover, the OPDC area covers multiple boroughs and more than one waste authority.
- Ealing Council does not accept this reasoning and extensive evidence has been prepared to support the emerging Local Plan for the OPDC which provides a reasonable measure of future demographics for the area. With regard to the fact that the OPDC covers multiple authorities and waste authorities whilst it may be more complicated to disaggregate the data it is nonetheless still possible.
- Much of the apportionment exercise relies solely on existing mapped GIS data collated at a pan-London level, rather than a Borough level and therefore it is no more challenging to run it for the MDCs than it is for any other LPAs. Furthermore, such concerns about the ability to disaggregate datasets have not materialised in relation to other key policy areas. In particular the draft London Plan recognises that the OPDC is a separate entity and separate targets for MDCs have been set for example in relation to housing (Policies H1, H2) and the management of industrial land (policy E4).
- It is noted that in the absence of assigning the MDCs their own share of the apportionment, the supporting text at Paragraph 9.8.7 advises that: 'Mayoral Development Corporation should cooperate with Boroughs to ensure that the boroughs' apportionment requirements are met'. Whilst we support the spirit of this statement, in practice its effect will be limited as it compels them to do very little, and it will not secure proper accountability. The lack of accountability in the form of LPA apportionments will create tensions and compromise the delivery of the London Plan policy. Whilst we are not questioning the MDC's intentions regarding their willingness to co-operate, it is inevitable that when faced with difficult choices around promoting waste activities above other uses, that without any binding policy imperative to plan for and to secure waste facilities that other uses will often win out, and thus the responsibility will be deflected back to the host boroughs, who will then unfortunately not possess the capability (suitable land capacity in this instance) to respond. Moreover, in the case of the OPDC the scale of change planned for the area through intensification is immense, and therefore the need for infrastructure such as waste facilities is also correspondingly significant. By itself then the text in paragraph 9.8.7 is wholly inadequate, it does not represent a proportionate response, and accordingly is not an acceptable alternative to assigning the MDCs their own apportionment.
- It should be noted that the OPDC are currently preparing a Local Plan, which is at an advanced stage, having been submitted to PINS in October 2018. Whilst Ealing has sought to positively engage with the OPDC in the preparation of their plan, ultimately it is not our plan. In respect of waste specifically Ealing have already submitted representations on the emerging Local Plan, and it is our intention to give evidence on these at their forthcoming EIP. These representations note our concerns with policy EU6, as this only seeks to address the current London Plan apportionments through safeguarding only those sites currently identified through the West London Waste Plan. Other than recognising the need for a potential further review no additional provision is made in the Local Plan to respond to the significantly higher apportionments in the New London Plan.

- It should also be borne in mind that the issues raised here are not new, and Ealing has been pressing on this matter with the GLA and the OPDC for a number of years. Of particular note are the comments raised by the Inspector (Mr A Thickett) examining the Further Alterations to the London Plan in 2014. He advised in his report that: *‘I have some sympathy with those Boroughs which may, because of the designation of a Mayoral Development Corporation (MDC), lose their planning functions in parts of their areas. It cannot be right, in my view, that in such cases, the responsibility for meeting the apportionment should fall wholly on the Borough.’*
- In response the Mayor of London inserted a new sentence in the current London Plan (Paragraph 5.80), although as illustrated above this has not been particularly effective in persuading or compelling the OPDC to do much more than just adopt the WLWP allocations. Although the inclusion of such wording in the supporting text was considered to be an appropriate response by the Mayor at the time, it is acknowledged that in respect of FALP that this point was identified relatively late in the plan preparation process, and so it would have been difficult to redo the calculations at that point. In the case of the draft new London Plan however, there has been ample time for the GLA to properly grapple with the challenge.
- In summary, the effective delivery of Policy SI8B is absolutely contingent on correctly assigning the apportionment to those LPAs with the capacity and capability to identify and allocate sites and areas for waste management facilities and accordingly in our view the policy is not sound.

- **d) Would they provide an effective framework for development management? In particular, would the criteria in Policy SI8C accord with national policy? Would Policy SI8D provide an effective and justified framework for the evaluation of proposals for new waste sites or to increase capacity of existing waste sites?**

No comment.

- **e) Would they be effective in safeguarding existing waste sites particularly in relation to Policy SI9C?**

No comment.