North London Waste Plan

Sustainability Appraisal Report

June 2015

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APPENDICES (Separate report)

SUSTAINABILITY APPRAISAL OF THE DRAFT NORTH LONDON WASTE PLAN

1. INTRODUCTION

1.1 Sustainability Appraisal and Strategic Environmental Assessment

1.1.1 Section 19(5) of the Planning and Compulsory Purchase Act 2004 (PCPA) requires that a Local Planning Authority which is preparing a Development Plan Document must undertake a Sustainability Appraisal (SA) throughout its production in order to ensure that it is fully consistent with, and helps to implement, the principles of sustainable development. The purpose of SA is to help ensure that Plans achieve an appropriate balance between environmental, economic and social objectives. It should help to identify the sustainability implications of different plan approaches and recommend ways to reduce any negative effects and to increase the positive outcomes. The SA thereby performs a key role in demonstrating to decision makers, and the public, that the Plan is the most appropriate given reasonable alternatives.

1.1.2 In parallel with this, the European Directive 2001/42/EC "*on the assessment of the effects of certain plans and programmes on the environment*" (the Strategic Environmental Assessment or 'SEA Directive') was transposed into United Kingdom law by the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations') and establishes the statutory obligation to undertake SEA with regard to any plan that:

- Is "prepared by an authority for adoption, through a legislative procedure by Parliament or Government, and is required by legislative, regulatory or administrative provisions" (Article 2(b)); and
- Concerns "town and country planning or land use… which sets the framework for future development consent of projects" (Article 5.2(a)).

1.1.3 The principal purpose of SEA is to ensure appropriate consideration is given to the likely significant environmental effects of the implementation of a plan. SA extends the scope of assessment so that environmental effects are considered in parallel with social and economic impacts so that the overall implications of the plan are subject to an integrated evaluation. Although SA and SEA are distinct processes, many of their requirements overlap and as a result the Government has issued guidance advising that an integrated approach to both assessments should be undertaken.

1.1.4 This Report outlines the findings of the SA of the draft North London Waste Plan (NLWP) and reasonable alternatives. The NLWP is at an 'early draft' stage and the 'final draft' version of the Plan will be the 'Proposed Submission' version which will be published in the future in-line with Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012. As such, this document is effectively an 'Interim' SA Report which has been produced to inform the consultation on the draft Plan and the subsequent preparation of the Proposed

Submission Plan and to identify, where appropriate, ways in which the Plan might be amended to deliver sustainability benefits.

1.1.5 Despite being an 'Interim' SA Report, this document has been produced to provide all of the information required (by the Environmental Assessment of Plans and Programmes Regulations, 2004) of a SA Report. As such, it acts as the 'environmental report' for the purposes of Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 and all references to SA throughout this report should be taken to also include the requirements of European Directive 2001/42/EC.

1.2 The North London Waste Plan

1.2.1 The seven North London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest are working together to produce the NLWP. Once adopted, the NLWP will form part of the statutory Development Plan for these areas and will provide an overarching framework for the management of North London's waste up to 2031.

1.2.2 The seven North London Boroughs, as Waste Planning Authorities (WPAs) are required to prepare a Waste Local Plan. The requirement to produce a Waste Local Plan is set out in Article 28 of the EU Waste Framework Directive which states that all member states must prepare a Waste Management Plan. The National Waste Management Plan for England, supported by the National Planning Policy for Waste (NPPW), identify that for England, the National Waste Management Plan will be supported by each WPA's Waste Local Plan and as such it is a statutory requirement to prepare this document.

1.2.3 The purpose of the Plan is to ensure there will be adequate provision of waste management facilities of the right type, in the right place and at the right time to manage waste in North London up to 2031. It will set out the waste management needs of North London and demonstrate how these needs will be met. It will identify suitable sites and areas for waste management facilities and will incorporate development management policies against which future planning applications for waste development will be determined.

1.2.4 The NLWP will cover all principal waste streams including:

- Local Authority Collected Waste (LACW): Waste produced by householders;
- Commercial and Industrial (C&I): Wastes produced by businesses and industry;
- Construction, Demolition & Excavation (CD&E): Waste produced through the undertaking of development, regeneration and infrastructure projects, building, renovation and maintenance of structures;
- Hazardous: A sub category of all waste streams where the material produced is hazardous and requires specialist handling and treatment;
- Agricultural waste: Waste produced by farming and forestry activity;
- Waste Water: Waste produced from managing and treating create waste water and sewage effluents; and

- Low level radioactive waste: Waste associated with the undertaking of x-rays and laboratory testing, research and some manufacturing activities in civilian, non-nuclear establishments using low level radioactive substances.

1.2.5 It is important to recognise that the NLWP will be strategic in nature and even the allocation of sites/areas should be regarded as a strategic undertaking given that the process omits consideration of some detailed issues in the knowledge that these will be addressed later (i.e. through the development management process). This strategic nature of the plan is reflected in the scope of the SA.

1.3 The SA Process

1.3.1 The process for undertaking SA/SEA is set out in detail in the national Planning Practice Guidance[1] and the document 'A Practical Guide to the Strategic Environmental Assessment Directive[2]'. This guidance subdivides the SA/SEA process into a series of stages. While each stage consists of specific tasks, the intention should be that the process is undertaken in an iterative manner.

1.3.2 The stages involved in undertaking SA (incorporating SEA) are summarised in Table 1.

Table 1: SA Process

Stage A: Establishing the context and baseline conditions; defining the scope and framework for the assessment	
A1	Identify relevant plans, programmes and sustainability objectives that will influence the plan
A2	Collect relevant social, environmental and economic baseline information
A3	Identify key sustainability issues for the SA / plan to address
A4	Develop the SA Framework, consisting of the SA Objectives and sub-objectives
A5	Produce a scoping report and consult relevant authorities, the public and other key stakeholders on the scope of the appraisal
Stage B: Developing and refining alternatives and assessing the effects of the plan	
B1	Testing the plan objectives against the SA framework
B2	Developing the plan alternatives
B3	Predicting the effects of the plan
B4	Evaluating the effects of the plan
B5	Considering ways of mitigating adverse effects and maximising beneficial effects
B6	Proposing measures to monitor the significant effects of implementing the plan
Stage C: SA Report	
C1	Preparing the SA Report
Stage D: Consultation on the SA Report	
D1	Seek representations on the SA Report from consultation bodies and the public
Stage E: Post Adoption Reporting and Monitoring	
E1	Prepare and publish post-adoption statement
E2	Monitor significant effects of implementing the Plan
E3	Respond to adverse effects

[1] CLG Planning Practice Guidance (2014)
[2] ODPM 'A Practical Guide to the Strategic Environmental Assessment Directive' (2005)

1.3.3 Stage A of the process corresponds to the scoping stage of the SA and the findings of this stage are presented in the Scoping Report which was issued for a five-week period of consultation in June 2014 and subsequently updated to take account of the representations received. During this stage the scope of the SA was defined.

1.3.4 Stage B of the SA process is linked to the overall production of the NLWP which includes the development of plan options and the selection of the preferred options. The NLWP is currently at this stage of the SA process.

1.3.5 This interim SA Report provides a summary of the SA process so far and documents the findings of the SA of the draft North London Waste Plan (NLWP) and reasonable alternatives. It will be used as a consultation document and issued to statutory bodies and stakeholders for comment alongside the draft NLWP document.

1.3.6 As outlined above, despite being an Interim SA Report, this document has been produced to provide all of the information required (by the Environmental Assessment of Plans and Programmes Regulations, 2004) of a SA Report. As such, the intention of this SA Report is to adopt an approach to appraisal which also meets the requirements of the SEA Directive and Regulations. The following table shows how this report meets the requirements of the SEA Directive.

Table 2: Compliance with the SEA Directive

Information to be included in an Environmental Report under the SEA Regulations	Relevant sections in the SA Report
An outline of the contents, main objectives of the plan and its relationship with other relevant plans and programmes.	1.2 2.1
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.	2.2
The environmental characteristics of areas likely to be significantly affected.	2.2
Any existing environmental problems which are relevant to the plan, including in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	2.1 2.2 1.5
The environmental protection objectives, established at international, Community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation.	2.1 2.2
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soils, water, air, climatic factors, material assets, cultural heritage, landscape, and the interrelationship between the above factors.	Section 4 Appendix Report
The measures envisaged to prevent, reduce and as fully as possible	4.5

offset any significant adverse effects on the environment of implementing the plan.	Section 7 Appendix Report
An outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties.	3.4 Section 4
A description of measures envisaged concerning monitoring.	Section 5
A non-technical summary of the information provided above.	Separate Document

1.4 Feedback from Consultation

1.4.1 Regulation 12(5) of the SEA Regulations stipulates that when deciding on the scope and level of detail of the information that must be included in the Environmental Report, the responsible authority should undertake appropriate consultation.

1.4.2 Consequently, when preparing the SA Scoping Report for the NLWP and defining the framework for the assessment the Council issued a draft Scoping Report for a five-week period of consultation that ran from Tuesday 3rd June 2014 to Wednesday 9th July 2014. Comments were invited on the content of the draft Scoping Report and, in particular, whether it identified the key sustainability issues from the baseline information and if the proposed Sustainability Appraisal Framework was appropriate.

1.4.3 Each of the statutory consultation bodies identified by the SEA Regulations[3] was consulted on scope and level of detail contained within the Report. In addition, and in line with the NLWP Consultation Protocol and each Borough's adopted Statement of Community Involvement (SCI), wider consultation on the Scoping Report was undertaken.

1.4.4 Comments were received on the draft Scoping Report from Natural England, the Environment Agency, North London Waste Authority, community groups and individuals. Some of the main comments received were the need to:

- Review additional relevant plans, policies and programmes to identify their implications for the NLWP;
- Incorporate additional baseline information relating to issues such as fly tipping and exempt facilities;
- Ensure that the identified sustainability issues acknowledge that location priorities for new facilities need to take account of proximity to waste sources, to disposal/re-use/recovery sites and to the location of markets for recovered or secondary materials;

[3] The SEA Regulations require the Environment Agency, English Heritage, Natural England and the Countryside Agency to be consulted on the scope of sustainability appraisals. However, the Natural Environment and Rural Communities (NERC) Act merged the Countryside Agency and English Nature to form a new agency - Natural England.

- Make a number of minor amendments to one objective and to indicator information relating to health, green infrastructure, transport, landscape, flood risk, waste self-sufficiency and the economy.

1.4.5 The SA Scoping Report has been updated to address these comments. It is considered that the revised SA Scoping Report forms a fit for purpose framework for the appraisal of the NLWP and that this framework has been subject to the statutory requirements set out in Regulation 12 of the SEA Regulations. The revised Scoping Report and a separate document summarising the comments received and how they were addressed will be published alongside this SA Report during the forthcoming consultation on the 'early draft' of the Plan.

1.5 Related Assessments

Habitat Regulations Assessment

1.5.1 Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna – the 'Habitats Directive' – provides legal protection for habitats and species of European importance. Article 6 of this Directive introduced the requirement to undertake a 'Habitat Regulation Assessment' (HRA) of the implications of proposed land use plans for the integrity of nature conservation sites of European importance. Such sites are known as Natura 2000 sites, and include Special Areas of Conservation (SACs), candidate Special Areas of Conservation (cSACs), Special Areas of Protection (SPAs), potential Special Areas of Protection (pSPAs), Ramsar sites and Offshore Marine Sites (OMSs).

1.5.2 The purpose of a HRA is to determine whether or not significant effects on European sites are likely and to suggest ways in which they could be avoided. Under the provisions of the Habitats Directive, consent can only be granted for such a plan if, as a result of the HRA, it can be demonstrated that the integrity of the sites will not be adversely affected or, where adverse impacts are anticipated, there are shown to be no alternative solutions and imperative reasons of overriding public interest for the plan to go ahead.

1.5.3 The HRA of the NLWP is being prepared and will be reported separately. The main issues that are likely to be addressed by this assessment concern the implications of the spatial strategy and proposed allocations for the protection of internationally designated wildlife sites, either alone or in-combination with other plans or projects occurring within the Plan area and adjacent parts of Greater London.

2. THE CONTEXT FOR THE PLAN

2.1 Links to Other Plans, Programmes and Strategies

2.1.1 Stage A1 of the SA process involves establishing the context in which the NLWP is being prepared, namely the other policies, plans and programmes, and sustainability objectives that could influence its content and the opportunities and challenges they present. The SEA Directive specifically requires environmental objectives established at international, European Community or national levels to be taken into account in developing a Plan. However, in order to facilitate a comprehensive approach, guidance on SA recommends that this should be widened to consider how the Plan can support the full range of other plans, policies and programmes that already exist, including at the regional and local levels, taking into account their economic and social as well as environmental objectives.

2.1.2 The Scoping Report published a list of relevant plans, policies and programmes and contained a detailed assessment of these plans and the key messages and implications of them for the NLWP. This list is reproduced in Appendix 1 to this report.

2.1.3 A number of key messages emerged from this review of policies, plans and programmes. These are summarised in Table 3 below and are grouped under the topics listed in the SEA Directive.

Table 3: Key Messages from the Policies, Plans and Programmes Review

Key Messages	Policies, Plans and Programmes
Biodiversity, Flora and Fauna • Ensure biodiversity is considered in all areas of decision-making. • Maintain, protect, enhance and restore biodiversity and the natural environment. • Avoid harm to designated sites and protected species. • Ensure the importance of green infrastructure is recognised.	The Ramsar Convention, Birds Directive (2009/147/EC), Habitats Directive (97/62/EC), EU Biodiversity Strategy to 2020, Conservation of Habitats and Species Regulations (2010), Wildlife and Countryside Act (1981), Natural Environment and Rural Communities Act (2006), UK Biodiversity Action Plan, 1994 (reviewed 2007), Biodiversity 2020: a Strategy for England's Wildlife and Ecosystem Services (2011), The Natural Choice (2011), Protection of Badgers Act 1992, Hedgerow Regulations 1997, NPPF, the London Plan, Mayor London's Biodiversity Strategy, London Biodiversity Action Plan, Local Plan Core Strategies and Development Policies documents, local BAPs.
Population and Human Health • Ensure wider health issues are considered and safeguard the health of the community. • Protect and improve quality of life. • Maintain / improve access to open space for leisure and recreation. • Locate sites where the potential impact on the health and well being of local communities is minimised. • Avoid adverse impacts on human health arising from the transport of wastes.	The NPPF, Healthy Lives, Healthy People: Our strategy for public health in England (2010), Local Plan Core Strategies and Development Policies documents, Sustainable Community Strategies.

Key Messages	Policies, Plans and Programmes
Soil • Prioritise the use of previously developed land. • Avoid ground pollution and seek to reduce land contamination.	The Mining Waste Directive (2006/21/EC), Safeguarding Our Soils – A Strategy for England, NPPF, the London Plan, Local Plan Core Strategies and Development Policies documents.
Water • Maintain and improve water quality. • Limit the impacts of waste management facilities on sensitive receptors such as water. • Use water resources efficiently and seek to minimise future demands. • Reduce the impact of flooding and avoid inappropriate development in areas of flood risk. • Avoid development that could increase flood risk. • Promote the management of surface water and reduction of flood risk using SuDS • Protect groundwater.	The Water Framework Directive (2000/60/EC), Directive 2006/118/EC on the protection of groundwater against pollution and deterioration, the IPPC Directive (2008/1/EC), NPPF, London Plan, National Flood and Coastal Erosion Risk Management Strategy for England – Environment Agency (2011) , Water for People and the Environment; Water Resources Strategy for England and Wales (2009), London Plan, Securing London's Water Future: The Mayor's Water Strategy (2011), Thames Region Catchment Flood Management Plan (2009), Managing Flood Risk in the Lower Lee Catchment, Today and in the Future (2013), Groundwater protection: principles and practice (GP3) (2013) Local Plan Core Strategies and Development Policies documents.
Air • Limit the impacts of waste management facilities on sensitive receptors such as air. • Reduce the distance local wastes travel to be managed by providing more waste management capacity in the plan area. • Increase use of sustainable transport methods and reduce the need to travel.	The IPPC Directive (2008/1/EC), European Air Quality Directive (2008/50/EC), Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007), Air Pollution: Action in a Changing Climate (2010), NPPF, the London Plan, Clearing the Air: The Mayor's Air Quality Strategy (2010), Local Plan Core Strategies and Development Policies documents, Air Quality Actions Plans.
Climate • Reduce contributions to climate change. • Recognise the need to diversify energy supply and increase the proportion of energy that is generated from renewable sources. • Recognise that waste can be a potential source of low carbon energy. • Limit the potential impact of waste management developments on climate change.	Kyoto Protocol, NPPF, Meeting the Energy Challenge: A White Paper on Energy (2007), Climate Change Act 2008, UK Climate Change Programme (2006), London Plan, Delivering London's Energy Future: The Mayor's Climate Change Mitigation and Energy Strategy (2011), the proposed Further Alterations to the London Plan (2015) which propose a carbon intensity floor for energy generating plant, Managing risks and increasing resilience: the Mayor's climate change adaptation strategy, Core Strategies and Development Policies documents.

Transport • Reduce emissions from the transport of waste by all modes by seeking to manage more waste close to its source. • Reduce the risk that movement of waste will contribute to road congestion and safety. • Promote sustainable transport of wastes encouraging use of rail and waterways.	European Air Quality Directive (2008), Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007), Waste Management Plan for England (2011). National Planning Policy for Waste (and associated Planning Practice Guidance) (2014), Sustainable Communities Act (2007), Meeting the Energy Challenge (2007), The Climate Change Act (2008), The Future of Transport White Paper (2004), The London Plan (2015), The Mayor's Waste Management Strategy (2011), North London Joint Waste Strategy (2008), The Mayor's Air Quality Strategy (2010), Borough Transport Strategies.
Material Assets • Prevent/reduce waste and recognise waste as a resource. • Promote employment opportunities and seek to reduce deprivation.	The NPPF, Local Plan Core Strategies and Development Policies documents, Sustainable Community Strategies.
Cultural Heritage • Protect the historic environment from inappropriate development.	Planning (Listed Buildings and Conservation Areas) Act (1990), Ancient Monuments and Archaeological Areas Act (1979), The Governments Statement on the Historic Environment for England (2010), National Heritage Protection Plan, NPPF, London Plan, Local Plan Core Strategies and Development Policies documents.
Landscape • Protect and enhance landscape character, improve local environmental quality and protect the environment. • Maintain access to the countryside. • Recognise the value of landscapes and townscapes.	European Landscape Convention (2000), Natural Environment and Rural Communities Act (2006), NPPF, The Natural Choice (2011), Local Plan Core Strategies and Development Policies documents.
Waste • Provide facilities for the treatment of waste. • Recognise the need for sustainable waste management practices and, in particular, the need to reduce waste production. • Manage waste in accordance with the Waste Hierarchy. • Continue to reduce reliance on landfill. • Increase self-sufficiency in terms of dealing with waste.	The Waste Framework Directive (2008/98/EC), Landfill Directive (99/31/EC), Packaging Waste Directive (2005/20/EC), Incineration of Wastes Directive (2000/76/EC), WEEE Directive (2002/96/EC), Waste Management Plan for England (2013), Government Review of Waste Policy in England (2011), Waste (England and Wales) Regulations 2011, Landfill (England and Wales) Regulations 2002, Hazardous Waste Regulations 2005, Waste Incineration (England and Wales) Regulations 2002, Household Waste Recycling Act 2003, PPS10, Updated national waste planning policy, Industrial Emissions Directive 2011, London's Wasted Resource: The Mayor's Municipal Waste Management Strategy (2011), Making Business Sense of Waste: The Mayor's Business Waste Strategy for London (2011), North London Joint Waste Strategy (2009), Local Plan Core Strategies and Development Policies documents.

2.2 Overview of the Sustainability Baseline and Key Issues

2.2.1 An important step when establishing the appropriate scope of a SA involves reviewing baseline information on the current environmental, social and economic conditions in the Plan area. This helps to enable the identification of those key sustainability issues that the SA should consider and which the Plan can address. Baseline data also provides the information necessary to assist in predicting and monitoring the effects of a plan.

2.2.2 This part of Chapter 2 provides a summary of the current state of the environment, existing environmental problems and the environmental characteristics of the area. The full review of baseline information is provided in the SA Scoping Report which also indicates the sources of the statistics quoted in the section below.

Biodiversity

2.2.3 The North London area includes a number of international, national, and local features of biodiversity interest. Within the NLWP area there is one Ramsar site (Lea Valley) which is also classed as a European Special Protection Area (SPA), one Special Area of Conservation (SAC) (Epping Forest), six Sites of Special Scientific Interest (SSSI), 307 Sites of Importance for Nature Conservation (SINCs) and 21 Local Nature Reserves (LNR).

2.2.4 International and European Designated sites cover large areas in the north east of the North London Plan Area. Nationally and locally designated sites are located throughout the North London area but are mainly concentrated within the west of the area. Development must be sensitive to these sites and should support their enhancement where applicable and practicable.

Population

2.2.5 The North London area is one of the most densely populated areas in the whole country and recent statistics show that the population in North London is continuing to rise at a rate above the national average, which has implications for the future growth in wastes created by households. The average age in North London is typically below the national average and this is particularly apparent in Islington, Hackney, Haringey and Waltham Forest which all have an average age below the Greater London average. Ethnic diversity is greater across the North London area than for England as a whole.

2.2.6 Hackney, Islington, Haringey, and Waltham Forest are all within the top 20 most deprived areas in the country. The indices of deprivation are based on income; employment; health and disability; education, skills and training; barriers to housing and services; living environment; and crime. Levels of deprivation are particularly acute in relation to barriers to housing and Hackney, Haringey and Waltham Forest all in the top five most deprived local authorities in England in relation to this domain.

Health

2.2.7 People living in the London Boroughs of Barnet and Enfield have longer average life expectancies for males and females than the national average. All of the other Boroughs have shorter average life expectancies for males than the average for London and England.

However, with the exception of Islington and Waltham Forest, all of the seven Boroughs have higher average life expectancies for females than the average for England. In general the statistics for people describing the state of their own health in the North London Boroughs are comparable with the London and national averages. However, within the inner London Boroughs a slightly greater proportion of people describe their health as 'Very Bad' when compared to national and London averages.

2.2.8 The method of waste processing, storage, transportation and disposal has the potential to impact human health through air, noise and water pollution in the same way as other commercial and industrial activities. However the risk of such impacts can be effectively minimised or eliminated using infrastructure or procedures imposed by planning conditions, environmental permitting and health and safety legislation.

2.2.9 As with other types of material transport, transportation of waste can pose health issues associated with noise and air pollution. The siting of these new facilities will need to take into account the available transport links and the proximity of the facility to the source and eventual destination of the materials whether these are still wastes or secondary products. In the North London area, consideration should be given to the utilisation of sustainable transport networks i.e. the River Lee, the Regents Canal and several railway lines that cross the Plan area.

Soil

2.2.10 The land use within the plan area is primarily urban. However, small pockets of land within Enfield and Barnet have been classed by Natural England as either grade 3 or grade 4 quality agricultural land. This is not considered a particularly valuable agricultural resource but implies that waste management in the plan area must consider agricultural waste provisions.

Water Quality and Resources

2.2.11 The River Lee and Lee Navigation are the main rivers/canals within the plan area. There are several other tributaries in the area together with the Grand Union Canal. River quality within the plan area varies considerably but there are a number of water bodies which have been classified as 'poor' by the Environment Agency under the Water Framework Directive.

2.2.12 Per capita water consumption in the Thames region exceeds the national average and the region has one of the lowest average rainfalls in the UK. Groundwater is an important resource in London, accounting for 20% of its drinking water. The Environment Agency has identified several source protection zones within the plan area where specific pollution prevention mechanisms are in place and potentially polluting activities routinely monitored. There are increasing pressures on water resources from an expanding population, increased urbanisation and changing climate.

2.2.13 All of the London Boroughs have some susceptibility to flooding, particularly surface water flooding. Parts of the plan area are also susceptible to fluvial flooding which is greatest along the River Lee and its tributaries. This flood risk will have to be taken into account by the

NLWP by preventing inappropriate development in areas at high risk of flooding and directing development away from areas at highest risk.

Air Quality

2.2.14 Air quality within the North London area is poor compared to average national levels and as a reflection the entire Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest have been declared as Air Quality Management Areas (AQMAs). These areas are designated due to high levels of nitrogen dioxide (NO_2) and particulate matter (PM_{10}) primarily derived from road vehicles. It is however anticipated that the number of days on which NO_2 and PM_{10} levels are exceeded will have reduced further by 2015

2.2.15 The NLWP can make a contribution to reducing air quality problems by providing more capacity to manage locally arising wastes within the Plan area thereby reducing waste transport miles and delivering a corresponding reduction in waste-related transport air emissions impacting local air quality generated by the sector. The NLWP can provide a further contribution to reducing air quality problems by encouraging the transport of waste by alternative modes such as rail and canal where this is logistically feasible and economically viable.

2.2.16 The potential health impacts associated with air pollution, arising from siting waste management facilities close to residential and employment areas and other sensitive receptors needs careful evaluation. Appropriate controls administered through the planning and waste licensing processes should be used.

Climate Change

2.2.17 The North London area is likely to be susceptible to the effects of climate change. In particular this includes the effects of increased flooding along the River Lee Valley, decreased water reserves, and increased air pollution through dry sunny weather and increased temperatures due to the 'heat island' effect in the Inner London Boroughs. Climate change projections indicate that by the middle of the century, the average summer day in London is likely to be 2.7°C warmer than the baseline average. By 2050 the average summer is also expected to be 19% drier than the baseline average but the average winter could be 15% wetter.

2.2.18 With the exception of Camden, the Boroughs have lower CO_2 emissions per capita than the national average. The higher level of per capita emissions in Camden is largely a reflection of the comparatively high levels of emissions per capita from non-domestic buildings. In each of the Borough's the per capita CO_2 emissions from road transport is significantly less than the national average. This is particularly apparent in Camden, Hackney, Haringey, Islington and Waltham Forest. Per capita CO_2 emissions from the domestic sector are below the national average in six of the Boroughs but are marginally higher in Barnet.

2.2.19 The NLWP can contribute to climate change mitigation by pursuing and promoting measures such as sustainable transportation and sustainable construction techniques in new waste facilities.

Transport

2.2.20 North London has a well developed network of roads and railways. Road congestion has however historically been a problem in parts of the plan area. The worst-affected areas are the southern parts of the area where the Congestion Charging Zone has been introduced to encourage a reduction in the number of journeys made by private car. Nevertheless, congestion in the main road network is an issue throughout the Plan area.

2.2.21 There are three main train lines running through the North London area which terminate in Euston, St Pancras, and Kings Cross, all of which are located within the London Borough of Camden. Together with the three main lines, London Overground national rail services also serve the area. North London is also well served by the London Underground and the Crossrail project will result in the creation of a new station within the south of the plan area. In addition, there are two main canals within the study area: the Regents Canal and the River Lee Navigation.

2.2.22 The transportation of waste by road can contribute to congestion and also have secondary impacts on air quality. The distribution of facilities across North London will need to be considered and the NLWP should also aim to maximise the potential for some waste to be transported by alternative modes of travel, such as rail or canal.

Economy

2.2.23 The average gross weekly earnings within each of the North London Boroughs is higher than the average for England and all of the Boroughs have a higher proportion of their working population employed in the top three Standard Occupation Classifications than the national average. However the cost of living in the North London Boroughs is high; residential property prices are considerably higher than the national average and continue to rise at rates that exceed the average for England and Wales. One result of the above average property prices is the low home ownership rate in comparison to the national average. The inner London Boroughs also has a higher average house price than the London average.

2.2.24 With the exception of Barnet, all of the North London Boroughs have higher unemployment rates than the national average. This is particularly prevalent in Hackney, Haringey, Islington and Waltham Forest.

2.2.25 The consideration of economic viability within the Waste Plan is essential in determining the suitability of sites. Waste management alone is not likely to play a major role in raising the economic profile of an area but with considered planning, it can contribute. Presence of a recycling or reprocessing facility can provide the impetus for others to invest in new local plant manufacturing products from secondary (reprocessed or recovered) materials generating jobs and wealth creation opportunities.

2.2.26 The main opportunity of a new waste management facility is to contribute to the urban regeneration of an area. In particular, facilities can stimulate the local economy by creating markets and providing heat from the waste to the local community and local businesses. The

provision of adequate facilities can also reduce the costs of managing waste by decreasing the need for waste to travel outside of the plan area for treatment / disposal.

2.2.27 Individual waste facilities typically employ relatively few staff; however a significant growth in infrastructure which enables the shift of waste treatment away from landfill, provides a potential benefit from cumulative growth in new jobs. In addition, although better technology means that there are likely to be fewer people directly employed within waste management facilities, other opportunities do exist, such as jobs associated with decentralised energy and the use of recycled products. Nevertheless, new facilities are likely to be distributed across the North London area so that they are close proximity to sources of waste though there may be good reasons to site them close to or alongside facilities reprocessing materials into secondary products as this can help to reduce the distance they travel, reducing potential air quality impacts and greenhouse gas generation.

Cultural Heritage

2.2.28 The North London area has over 14,000 listed buildings, 185 conservation areas, and 30 historic parks and gardens within the North London area. English Heritage identifies that over 140 of these listed buildings, 21 conservation areas and 3 historic parks and gardens are at risk of neglect and damage.

2.2.29 This wealth of heritage assets within the North London area could provide additional constraints on the location of new waste management facilities.

Landscape

2.2.30 There are no Areas of Outstanding Natural Beauty or other statutory landscape protection designations within North London. Practically all of the non-urban land in North London is designated as Green Belt excluding registered parks. The majority of the landscape of the area is defined by the Inner London Countryside Character Area.

2.2.31 Enfield has also identified Areas of Special Character where the Council will seek to preserve and enhance the essential character of the area, including landscape features such as woodlands, streams, designed parklands and enclosed farmland.

2.2.32 These designations can place substantial constraints on the type and scale of development that might occur outside of the urban area.

Waste Management

2.2.33 The Waste Data Study that informs the development of the NLWP has identified that London as a whole produced approximately 22 million tonnes of waste in 2012. 17% (3.7 million tonnes) of this waste was Local Authority Collected Waste (LACW), 34% (7.5 million tonnes) was Commercial and Industrial (C&I) waste, 47% (10.4 million tonnes) was Construction, Demolition and Excavation (CD&E) waste. Overall 57% of waste produced in London is recycled.

2.2.34 In the financial year 1 April 2012 to 31 March 2013 the seven North London Boroughs collected 822,384 tonnes of LACW. This accounted for approximately 29% of all waste produced in North London. Within North London itself, Barnet and Enfield produce more LACW than the other Boroughs. The majority of LACW in North London is managed as energy from waste.

2.2.35 Approximately 908,000 tonnes of C&I waste (37% of all waste produced in north London) were produced in North London in 2011. This equates to approximately 21% of the total C&I waste produced in London. The majority of C&I waste generated is from the commercial sector and is either reused or recycled or disposed of by landfill. Very little C&I waste undergoes thermal treatment or transfer.

2.2.36 In 2011, there were 276,837 tonnes of Construction & Demolition waste and 496,193 tonnes of excavation waste arisings in north London. These waste streams equate to approximately 31% of all north London's waste arisings, much of which is reused on site.

2.2.37 There was an estimated 9,223 tonnes of agricultural waste arisings in North London in 2012. This represents less than 1% of all waste arisings in North London.

2.2.38 The main Thames Water sewage treatment facility in North London is Deephams Sewage Treatment Works (STW). This facility serves a Population Equivalent (PE) of 891,000 (as at 2011) and currently treats 209,000 tonnes of sewage that arrives at the works each day, although this can increase to over 1.3 million tonnes during heavy rainfall. Works are planned to upgrade Deephams STW. This proposed upgrade will increase the effluent treatment capacity of the STW so that it is able to serve a PE of 989,000 which will accommodate population growth up until at least 2031. Thames Water is also proposing an upgrade to the sewage sludge treatment stream at Deephams STW which will be sufficient to meet their needs during the plan period.

2.2.39 The current waste infrastructure in North London is dominated by transfer stations and treatment/recycling/composting facilities. However, the waste transfer facilities in North London are increasingly also sorting and recycling material. There are no disposal sites in the plan area, only one incinerator with energy recovery and nine household waste recycling centres. Over one third of the waste facilities in North London are located in Enfield. Barnet, Haringey and Waltham Forest also have a reasonable number of sites, whereas Camden, Islington and Hackney have very few sites. The only waste management facilities in Camden and Islington are household waste recycling centres.

2.2.40 The lack of disposal sites and the high number of transfer stations indicate that a significant proportion of North London's waste is being transferred out of the area for disposal. Although, as noted above, the waste transfer facilities in North London are increasingly also sorting and recycling material. Analysis of wastes movements also indicates a substantial quantity of waste arising in other parts of the capital passes through transfer stations in North London raising the quantity of waste that it appears to export.

2.2.41 Hazardous waste arisings in North London in 2011 amounted to 62,473 tonnes. Since 1998 hazardous waste arisings have decreased significantly. The majority of hazardous waste is C&D waste and asbestos or from waste water treatment and the water industry.

Data Gaps

2.2.42 During the SA process several data gaps have been identified within the baseline assessment due to the lack of information of suitable quality. The majority of these data gaps relate to waste management information; however, there are also some data gaps within the environmental, social, and economic sections of the baseline report. Examples of specific gaps include:

- Information regarding the general health of the North London population and any at risk groups;
- Detail on the risk of sewer flooding in the North London area; and
- Detail on groundwater provision and the quality of this resource.

2.2.43 In relation to waste, there is more information available for certain waste streams than others. In particular, there is more up-to-date, reliable information available for LACW waste arisings in North London than there is for C&I, CD&E and agricultural waste.

2.2.44 Other specific data gaps include:

- Details of nuisance related to waste management activities across the seven Boroughs;
- Information regarding the amount of energy generated from thermal treatment of waste and information on what this energy is used for;
- Information on the sources of ground contamination;
- Information on the arisings of low-level radioactive waste in North London; and
- Information regarding the transportation of waste, including kilometres travelled and the modes of transport utilised in the North London area.

Future Changes without the Plan

2.2.45 The SEA Regulations not only require the relevant aspects of the current state of the environment to be reported but also state that consideration should be given to the likely evolution of these issues if the Plan is not implemented. The table below lists trends relating to the key sustainability issues in North London and identifies whether there is scope for the Plan to influence these trends.

Table 4: Summary of projected further changes

Projected Trend	Potential Influence of the Plan
Continuation of a fast growing population which is increasing above the national average	The implementation of the Plan is unlikely to affect this issue but any increase in the population is likely to result in an associated growth in waste.
Continuation of high population density	The implementation of the Plan is unlikely to

Projected Trend	Potential Influence of the Plan
	affect this issue.
Five of the seven North London boroughs have shorter average life expectancies for males than the average for London and England. Both Islington and Waltham Forest also have lower average life expectancies for females than the national average.	Apply development management policies to ensure that new waste management development does not have an unacceptable impact on the health and amenity of nearby sensitive receptors.
Average gross weekly earnings are likely to remain above the national average but the high costs of living are likely to continue.	The implementation of the Plan is unlikely to have a significant effect on costs of living. Facilitate, as far as possible, new waste facilities to generate incremental employment gains.
Continuation of high levels of deprivation and unemployment in some areas, particularly in relation to barriers to housing.	Facilitate, as far as possible, new waste facilities to generate incremental employment gains recognising that these are likely to have a limited impact on overall levels of deprivation. The implementation of the Plan is unlikely to affect barriers to housing.
The North London area is likely to be susceptible to the effects of climate change. In particular this includes the effects of increased flooding, increased air pollution through dry sunny weather and increased temperatures.	Require new development to take this into account by, for example, incorporating high standards of insulation and natural ventilation and by reflecting flood risk issues and incorporating infrastructure such as SuDS to mitigate it.
Air quality is poor compared to national levels. The number of days on which recommended levels are exceeded is forecast to decrease but it is not certain that this is a long term trend.	Support improvements to air quality by seeking to bring sources of waste and management facilities as close together as feasible and promote alternative methods of transporting waste.
Continuation of need to reduce greenhouse gas emissions.	Support reductions in greenhouse gas emissions by promoting recycling and the re-use of materials and by reducing 'waste miles' by supporting the provision of sufficient facilities within the Plan area to manage North London's waste.
There are a number of water bodies which have been classified as being 'poor' quality.	Require new development to take this into account by, for example, incorporating SuDS.
Per capita water consumption continues to exceed the national average.	Apply development management policies so that this issue is addressed for new applications by, for example, requiring new development to be water efficient unless this is already covered by individual borough's policies
Road congestion has historically been a problem in some areas and could continue to be an issue.	Define spatial strategy that brings sources of waste and management facilities as close together as feasible and promote alternative methods of transporting waste.
A significant proportion of North London's waste is being transported out of the area	Support the delivery of suitable waste management sites that help achieve net self-

Projected Trend	Potential Influence of the Plan
for disposal.	sufficiency and reduce the amount of waste that is exported out of the Plan area.
Hazardous waste arisings have decreased significantly but CD&E waste arisings could continue to increase.	Support the delivery of suitable waste management sites that help achieve net self-sufficiency and to help move waste up the Waste Hierarchy.

3 THE SA FRAMEWORK AND METHODOLOGY

3.1 The SA Framework

3.1.1 SA is an objectives-based appraisal in which the potential impacts of a Plan are assessed in relation to a series of objectives that promote sustainable development. The establishment of these objectives is therefore central to the SA process as it provides the methodological yardstick against which the sustainability effects of the Plan can be described and evaluated.

3.1.2 The SA Objectives are established as part of Stage A of the SA process and reflect the key sustainability issues identified through the analysis of the evidence base set out in the SA Scoping Report. Drawing upon the sustainability issues identified through analysis of baseline data and the review of other relevant plans and strategies, the NLWP SA Scoping Report identifies fourteen SA objectives. Criteria for measuring progress against each Sustainability Objective were also developed to assist with the appraisal of the NLWP.

3.1.3 Table 5 identifies the SA Objectives for the NLWP. Each of the Objectives is supported by a series of subsidiary assessment criteria to add further clarity and to assist the assessment process.

Table 5: SA Objectives and Assessment Criteria

SA Objectives		Assessment Criteria
1	To protect people's health, communities and local environmental quality from the adverse effects of waste management.	• Will the plan/proposal have an adverse impact on levels of nuisance including dust, particulate emissions, noise (including traffic noise), vibration, visual amenity and light pollution? • Will it redress environmental inequalities within the plan area?
2	To maintain green infrastructure and open space.	• Will the plan/proposal support the creation of healthier lifestyles through, for example, the provision of new or improved open space? • Will it have an adverse impact on the green infrastructure network? • Will it lead to a loss of open space / reduction in public access?
3	To promote sustainable modes of transport, reduce the need to travel and improve choice and use of more sustainable transport modes.	• Will the plan/proposal reduce overall transport distances for waste? • Will it reduce waste-related car and lorry traffic and increase sustainable transport use? • Will it reduce/increase road congestion?
4	To conserve and enhance the historic environment, heritage assets and their settings.	• Will the plan/proposal have an adverse impact upon heritage assets and/or their setting?
5	To maintain and enhance the quality and character of North London's townscapes and landscapes.	• Will the plan/proposal have an adverse impact on local landscape character or on townscapes? • Will it have an adverse affect on the openness of the Green Belt? • Will it affect areas of public open space? • Will it lead to landscape/townscape improvements? • Will it result in development that is sympathetic to its surroundings?
6	To maintain, protect and enhance biodiversity, protected species, habitats, geodiversity and features of geological interest.	• Will the plan/proposal have an adverse impact upon protected sites or species? • Will it restore or create new habitat? • Will it lead to the loss of, or impact on the integrity of, BAP habitats or species?
7	To reduce and manage flood risk	• Will the plan/proposal help to avoid inappropriate development in areas at risk of flooding? • Will it exacerbate vulnerability to flooding? • Will the plan reduce flood risk through the use of SUDS? • Will the plan involve the reconfiguration of existing sites or development of a flood alleviation scheme?
8	To adapt to, and reduce the impacts of, climate change.	• Will the plan/proposal help to reduce vulnerability to the impacts of climate change?

SA Objectives		Assessment Criteria
9	To reduce contributions to climate change, promote energy efficiency and increase the use of energy from sustainable sources.	• Will the plan/proposal increase emissions of greenhouse gases from waste activities? • Will it reduce emissions of greenhouse gases? • Will it encourage the use and/or production of renewable energy? • Will it reduce waste-related car and lorry traffic and increase sustainable transport use?
10	To protect and improve air quality, water quality and soils.	• Will the plan/proposal have an adverse impact on air quality? • Will it reduce/increase road congestion? • Will the plan/proposal have an adverse impact on surface or ground water quality? • Will it improve existing water quality? • Will the plan/proposal support the remediation of contaminated land? • Will it have an adverse impact on soil quality?
11	To manage waste sustainably, maximise North London's self-sufficiency in the management of waste, minimise the production of waste and increase re-use, recycling and recovery rates.	• Will the plan/proposal minimise the production of waste? • Will it promote sustainable waste management and encourage movement of waste up the Waste Hierarchy?
12	To ensure the efficient use of land and natural resources and the sustainable management of existing resources.	• Will the plan/proposal make use of previous developed land or buildings? • Will it increase demand for water? • Will it incorporate/encourage measures to ensure water is used efficiently?
13	To encourage sustainable economic growth, exploit the growth potential of business sectors and improve the competitiveness and productivity of the local waste industry.	• Will the plan/proposal encourage sustainable economic growth through provision of adequate waste management facilities? • Will the plan/proposal diversify the economy in terms of the waste management sector? • Will it enable new and innovative waste management technologies to be developed and utilised? • Will it enable maximum value recovery from waste where possible? • Will it promote waste minimisation?
14	To reduce economic disparities, unemployment and deprivation.	• Will the plan/proposal support the creation of a broad range of jobs and employment opportunities?

3.2 Compatibility of SA and NLWP Objectives

3.2.1 The SA Objectives are distinct from the Strategic Objectives of the Plan which are focused on specific outcomes relating to the provision of waste management capacity whereas the SA Objectives cover the wider perspective required by SA with respect to the social, economic and environmental impacts of the Plan. The objectives for the draft NLWP are as follows:

Table 6: Strategic Objectives

Objective Number	Objective
1	To support the movement of north London's waste as far up the Waste Hierarchy as practicable, to ensure environmental and economic benefits are maximised by utilising waste as a resource.
2	To ensure there is sufficient suitable land available to meet North London's waste management needs through safeguarding and allocation policies.
3	To achieve net self sufficiency by providing opportunities to manage as much as practicable of North London's waste within the Plan area taking into account the amounts of waste apportioned to the Boroughs in the London Plan, and the requirements of the North London Waste Authority.
4	To ensure that all waste developments accord to high standards of design and build quality, and that the construction and operation of waste management facilities do not cause unacceptable harm to the amenity of local residents or the environment.
5	To ensure the delivery of sustainable waste development within the plan area through the integration of social, environmental and economic considerations
6	To provide opportunities for North London to contribute to the development of low carbon industries and decentralised energy
7	To support the use of sustainable forms of transport and minimise the impacts of waste movements including on climate change
8	To protect, and where possible enhance, North London's natural environment, biodiversity, cultural and historic environment

3.2.2 A key initial stage of the assessment is to evaluate the extent to which the two sets of Objectives are aligned and to consider whether the objectives of the NLWP are consistent with the principles of sustainable development. This enables conflicts and tensions between the objectives to be identified and necessary additions or amendments to be made. The compatibility of the two sets of objectives is assessed in Table 7.

Table 7: Compatibility of the SA and NLWP Objectives

NLWP Objectives	SA Objectives													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
1			?						✓	?	✓	✓	✓	
2	?	?	✓	?	?	?	?	?	✓	✓		✓	✓	✓
3	?	?	✓	?	?	?	?	?	✓	✓		✓	✓	✓
4	✓			✓	✓	✓				✓				
5	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
6	?				?			✓	✓	?	✓	✓	✓	
7	✓		✓						✓	✓		✓		
8		✓		✓	✓	✓					?			

KEY

✓	Compatible	X	Incompatible	?	Unknown / unclear		No link

3.2.3 Table 7 highlights that the majority of the interactions identified between the objectives are positive and, as a result, most of the two sets of objectives are largely considered to be compatible with each other. There were no instances where it was considered that the objectives were potentially incompatible. Nevertheless, there are a number of instances where the relationship between the two sets of objectives is considered to be uncertain. For example, the NLWP objective of ensuring that there are sufficient suitable sites available to meet North London's waste management needs would have an uncertain impact on a number of social and environmental SA objectives as it is not certain whether any of these sites may have an impact on, for example, the character of townscapes or green infrastructure. Nevertheless, it is acknowledged that the Plan and the Development Management process should ensure that any such adverse impact is avoided or mitigated. It is also recognised that not identifying sufficient sites for waste management facilities also has the potential to have adverse social, environmental and economic implications.

3.3 Approach to the Assessment

3.3.1 The Spatial Strategy and all policies and site/area allocations in the NLWP have been assessed against the SA Framework. Section 12(2) of the SEA Regulations also requires the likely significant effects of implementing reasonable alternatives to be identified, described and evaluated. In accordance with this requirement, reasonable alternatives have also been considered against the SA Framework.

3.3.2 The appraisal process has considered the degree and type of impact on each of these objectives. This has been a qualitative assessment of whether or not the predicted effects on the objective are likely to be significant. A qualitative five point scale set out in Table 8 has been used as the basis for this assessment which ranks the effect from major positive to neutral through to major negative and degrees between. Where the effect is unclear or cannot be assessed a '?' has been used.

Table 8: Criteria for Assessing the Significance of Impacts

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

3.3.3 The appraisal has also considered the likely timing of any impacts, split by short term (0-5 years), medium term (5-10 years), and long-term (10+ years – or likely to last over the whole of the Plan period). In addition, it has predicted the probability of the impact occurring (high, medium or low); the scale of impact; the permanence of the impact (temporary or permanent); any key secondary, cumulative and/or synergistic impacts; and options for mitigation.

3.3.4 The assessments have adhered to normal procedure for SA/SEA in evaluating the impact of the policy or site without mitigation. Taking mitigation into account at this stage would involve a presumption that appropriate measures will be used when this cannot be guaranteed at present.

3.3.5 Each assessment concludes with a summary section reviewing the overall findings and proposing mitigation measures.

3.4 Data Limitations / Technical Difficulties

3.4.1 The SEA Directive requires the identification of any difficulties encountered; these may include technical deficiencies or lack of knowledge.

3.4.2 Certain strategic policies in the draft NLWP have no spatial expression. As a result, during the appraisal of the draft NLWP, there were a number of instances where it was difficult to reach a judgement on the likely effect of a particular policy due to there being a lack of information on how and where actions would be carried out.

3.4.3 When assessing site and area allocations it was difficult to predict impacts on certain objectives as this will depend on the type of waste management facility that is delivered as, for example, the degree of impact on dust and traffic levels would depend on the type of facility. Similarly, the degree to which a facility will move management of material up the Waste Hierarchy would also vary depending on the type of facility. A number of the proposed area allocations are quite large. As a result, a common difficulty encountered was that it is difficult to predict the impact of directing waste management facilities to these locations without knowing whereabouts in the area the development would take place. This was a

particular issue when appraising areas which, for example, only adjoined residential properties on one boundary which made it difficult to predict whether waste management development would take place in close proximity to a sensitive receptor.

3.4.4 A number of data limitations were also encountered during the process. For instance, limited information is available on sewer and groundwater flooding. Consequently, when assessing sites and areas against the objective that relates to reducing flood risk there was a need to focus on flooding from fluvial, tidal and surface water sources.

4. APPRAISAL OF THE DRAFT NLWP

4.1 Introduction

4.1.1 This section provides a summary of the results of the SA of the draft NLWP. The first part of this chapter provides an overview and assessment of the principal options that were evaluated as part of the preparation of the NLWP.

4.1.2 The second part of the chapter documents the results of the SA of the draft NLWP. It includes a summary of the appraisal of the Spatial Strategy, policies and site/area allocations contained within the plan against the fourteen sustainability objectives identified in the SA Scoping Report and their associated evaluation criteria. The full details of the assessments are provided in the accompanying Sustainability Appraisal Report Appendices.

4.2 Assessing Alternatives

4.2.2 Section 12(2) of the SEA Regulations requires the likely significant effects of implementing reasonable alternatives to be identified, described and evaluated. In accordance with this requirement, this section provides an overview of how reasonable alternatives have been considered during the SA Process.

Strategic Approach

4.2.3 A series of options were considered when determining the strategic approach that the NLWP would take to waste management in North London. These relate to how much waste will be generated over the plan period (growth assumptions), how much waste can be managed within North London (capacity strategy), and how this waste should be managed (management strategy). The Options are set out in more detail in an Options Appraisal Report[4] and are assessed in relation to SA below.

Growth assumption options for calculating future waste arisings in North London to 2031

4.2.4 The Waste Data Study[5] contained a number of population and economic growth scenarios to identify the likely future waste management requirements over the plan period. The modelling looked at a range of different growth rates representing objectives set within Mayoral strategies, including the London Plan, as well as those set nationally. The following growth assumption options were considered:

- Option A: No Growth
- Option B: Growth
- Option C: Minimised Growth

4.2.5 Evidence and projections anticipate substantial population and economic growth in London over the next few decades. As a result, planning for no growth (Option A) or minimise

[4] North London Waste Plan: Options Appraisal for the Draft Plan (2015)
[5] North London Waste Plan: Waste Data Study – Part 1: Waste Arisings in North London (2014)

growth (Option C) were not considered to be realistic and would result in a risk of there being an under-provision of capacity for waste needs in North London over the next fifteen years. The SEA Regulations only require an assessment to be made of the environmental effects of implementing 'reasonable' alternatives. Consequently, given that Options A and C are not considered to be realistic, it is considered that they do not constitute reasonable alternatives for the purpose of the SEA Regulations.

Capacity strategy options for how much of North London's waste can be managed within North London

4.2.5 The NLWP is required to meet apportionment targets for LACW and C&I waste set out in the London Plan. In addition the NLWP has to plan for all waste arising in the plan area for all the main waste streams, as set out in EU and national policy. In developing the draft NLWP, a number of options were considered in relation to how much waste and what type of waste the Plan should seek to manage within North London. These options were[6]:

1. Meeting the London Plan apportionment
2. Net self-sufficiency for LACW and C&I waste streams
3. Net self-sufficiency for LACW, C&I and CD&E waste streams
4. Complete self-sufficiency.

4.2.6 The draft NLWP has been based on Option 3 as, unlike Options 1 and 2, this approach is considered to be compliant with European and national legislation on managing all main waste streams. Option 3 would also demonstrate to neighbouring authorities outside London that North London intends to manage as much of its own waste as possible and reduce exports. There are also concerns about the deliverability of Option 4 given that the achievement of complete self-sufficiency could be impeded by physical constraints, the requirement to meet specialised waste management needs and the workings of the waste industry which mean that the patterns of management and movement of C&I and CD&E wastes are subject to commercial decisions and contracts over which local waste planning authorities have no direct control. Each of the options have however been appraised. A summary of the conclusions of the appraisal of the options is provided in Table 9. Full details of the assessment are provided in Appendix 1.

Table 9: Summary of the Appraisal of the Capacity Strategy Options

Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Option 1	–	?	+	?	?	?	?	?	+	?	+	+	+	+
Option 2	–	?	+	?	?	?	?	?	+	?	+	+	+	+
Option 3	–	?	++	?	?	?	?	?	++	+	++	+	+	+
Option 4	–	?	++	?	?	?	?	?	++	+	++	+	+	+

4.2.7 As Table 9 demonstrates, although each of the capacity strategy options has the potential to have a positive impact on a number of sustainability objectives, there are a number of

[6] Net self-sufficiency involves providing capacity equivalent to that needed to manage all wastes arising in North London. The waste industry may continue to operate by moving wastes between authorities so it is managed at the most convenient or cheapest location, but net self-sufficiency demonstrates that facilities in North London would be sufficient to manage all local wastes if necessary.

instances where Options 3 and 4 could have a more significant positive impact on the objectives. In particular, by providing enough waste management capacity to manage at least the equivalent of the waste generated in North London, Options 3 and 4 have the potential to have a more significant positive impact on the objectives that relate to maximising self-sufficiency in the management of waste, reducing contributions to climate change and reducing the need to travel. Options 3 and 4 could also have a positive impact on the objective of protecting and improving air, water and soil quality. All four of the options would however have a positive impact on the objectives that relate to ensuring the efficient use of natural resources, encouraging sustainable economic growth and reducing unemployment.

4.2.8 However, without the implementation of appropriate mitigation measures, each option has the potential to have some negative impact on the objective that relates to amenity as, due the nature of the urban area in North London, each option is likely to result in waste management facilities being directed to locations that are in close proximity to sensitive receptors. Each option would have an uncertain impact on the remaining objectives.

Management strategy options for how waste will be managed in North London

4.2.9 The North London Boroughs have statutory duties to meet targets and the NLWP will need to be ambitious in order to achieve European Union, national, regional and local targets. In developing the draft NLWP the following three potential recycling / recovery options were considered:

1. Baseline
2. Maximised recycling
3. Maximised recovery / median recycling

4.2.10 The draft NLWP has been based on Option 2 as it is considered that this approach is better aligned with European, national, regional and local targets. It also means that more waste will be managed further up the Waste Hierarchy and is more consistent with the aims of the NLWP. Each of the options have however been appraised. A summary of the conclusions of the appraisal of the options is provided in Table 10. Full details of the assessment are provided in Appendix 1.

Table 10: Summary of the Appraisal of the Management Strategy Options

Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Option 1	–	?	–	?	?	?	?	?	–	–	?	?	?	0
Option 2	–	?	+	?	?	?	?	?	++	+	++	++	++	+
Option 3	–	?	+	?	?	?	?	?	++	+	+	+	+	+

4.2.11 As Table 10 demonstrates, although each of the management strategy options would have an uncertain impact on the majority of the sustainability objectives, there are clear differences in the performance of the options in some aspects of the SA process. In particular, Options 2 and 3 have the potential to have a positive impact on the greatest number of objectives. Specifically, Option 2 could have a major positive effect on the

objectives that relate to managing waste sustainably, improving the productivity of the waste industry, ensuring the efficient use of resources and reducing contributions to climate change. Option 3 could also have a positive impact on each of these objectives and both options could also have some positive impact on the objectives that relate to minimising the need to travel and reducing economic disparities. By contrast Option 1 would have a negative, uncertain or neutral impact on each of these objectives.

4.2.12 However, without the implementation of appropriate mitigation measures, each option has the potential to have a negative impact on the objective that relates to amenity as, due the nature of the urban area in North London, each option is likely to result in waste management facilities being directed to locations that are in close proximity to sensitive receptors. Each option would have an uncertain impact on the remaining objectives.

Sites and Areas

4.2.13 An extensive site search and selection process was undertaken as part of the preparation of the plan. This included a survey of existing waste sites, call for sites exercises and a desk based land availability search using GIS.

4.2.14 Following the compilation of this process, a long list of sites was produced. This list of sites was subsequently refined by assessing each of the sites against a series of criteria which were split into two levels: absolute criteria and screening criteria.

4.2.15 The aim of using the criteria was to apply a level of judgement to the process to ensure that those sites/areas which are wholly unsuitable are excluded from further consideration and to identify those which may be suitable. Accordingly, those sites which were affected by absolute criteria, such as those that were within sites of international or national importance for nature conservation or which contain Scheduled Ancient Monuments and grade I or grade II* Listed Buildings, were excluded from the process.

4.2.16 Given that these sites are considered to be unacceptable for waste management development, they are not considered to constitute reasonable alternatives within the context of the SEA Regulations. As such, these discounted sites have not been assessed in this report.

4.2.17 The revised list was subsequently refined by eliminating sites which were not considered to be realistic or deliverable because they had been identified for an alternative use in a Local Plan, had an application for another use coming forward, or where the landowner had indicated that the site was not available for waste management development unless the site already has permission for a waste use. These discounted sites are also not considered to be reasonable alternatives for the purpose of SEA Regulations and are not assessed in this report.

4.2.18 The remaining sites and areas have all been proposed for allocation and have therefore been assessed as part of the appraisal of the draft NLWP. A summary of the appraisal of these

sites and areas is provided in Section 4.3 below and the full appraisals are contained within Appendices 4 and 5.

4.3 Assessing the Draft NLWP

Spatial Strategy

4.3.1 The Spatial Strategy sets out the physical distribution of key characteristics, including infrastructure, geographical features and planning designations, which will influence the Plan and identifies opportunities and constraints within that framework. A summary of the conclusions of the appraisal of the Spatial Strategy contained within the draft NLWP is provided in Table 11. Full details of the assessment are provided in Appendix 2.

Table 11: Summary of the Appraisal of the Spatial Strategy

Policy	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Spatial Strategy	+	+	+	+	+	+	+	+	+	+	++	+	+	+

4.3.2 As Table 11 demonstrates, the Spatial Strategy has the potential to have a positive impact on a wide range of objectives. In particular, by supporting the provision of a network of waste sites across North London it could have a major positive impact on the objective of managing waste sustainably and some positive effect on the objectives that relate to encouraging sustainable economic growth and reducing economic disparities.

4.3.3 The Spatial Strategy seeks to protect amenity by directing waste management development to the most suitable sites/areas taking into account environmental and physical constraints. As a result, the Strategy also has the potential to have a positive impact on the objectives that relate to health and amenity; green infrastructure; heritage; landscapes and townscapes; biodiversity; flood risk; adapting to climate change; and protecting air, water and soil quality.

4.3.4 One of the key principles of the Spatial Strategy is to direct waste management facilities to locations where there are potential opportunities to better utilise sustainable modes of transport such as rail and waterways. It also seeks to secure a wider distribution of waste facilities, reduce waste exports and increase the amount of waste managed in proximity to its source, which could help minimise the distance that waste needs to be transported in order to be managed. The strategy could therefore have a positive impact on the objective that relates to sustainable transport and reducing the need to travel. This element of the Spatial Strategy, together with the promotion of opportunities for decentralised heat and energy networks, should also ensure that the Strategy has a positive effect on the objective of reducing climate change contributions.

Policies

4.3.5 The draft NLWP contains a series of policies against which planning applications for waste development will be determined. These policies provide the mechanism through which the aims and objectives, waste management strategy and spatial strategy will be delivered. A

summary of the conclusions of the appraisal of the policies contained within the draft NLWP is provided in Tables 12 and 13. Full details of the assessment are provided in Appendix 3.

Table 12: Summary of the Appraisal of the Policies

Policy	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
1. Safeguarding of Existing Waste Management Sites	?	0	+	0	0	0	0	0	+	0	+	+	+	0
2. Site Allocations	+	+	?	+	+	+	+	+	+	+	++	++	+	+
3. Area Allocations	+	+	+	+	+	+	+	+	+	+	++	++	+	+
4. Unallocated Sites	+	+	+	+	+	+	+	+	+	+	++	+	+	+
5. Re-use & Recycling Centres	0	0	+	0	0	0	0	0	+	0	++	++	+	0
6. Assessment Criteria for Waste Management Development	+	+	+	+	+	+	+	+	+	+	0	?	0	0
7. Energy Recovery & Decentralised Energy	0	0	0	0	0	0	0	0	++	-	+	++	+	0

4.3.6 As Table 12 demonstrates, the policies within the draft NLWP would largely have a positive impact on the sustainability objectives. In particular, many of the policies would have a major positive effect on the objective of managing waste sustainability, maximising self-sufficiency in the management of waste, minimising the production of waste and increasing re-use, recycling and recovery rates. Policies 2, 3, 5 and 7 could also have a major positive impact on the objective that relates to ensuring the efficient use of land and resources.

4.3.7 Policies 2 – 4 and 6 include measures to ensure that new waste management facilities do not have an unacceptable impact on a wide range of social and environmental considerations. As a result, these policies could support a particularly wide range of objectives, including those which relate to protecting health and amenity; maintaining green infrastructure; conserving the historic environment; protecting biodiversity; maintaining townscapes and landscapes and reducing flood risk. By supporting the creation of new employment opportunities, policies 2 – 4 could also have a positive impact on the objective of reducing unemployment and deprivation.

4.3.8 There are a number of instances where the impact of a policy on particular objectives is uncertain. For instance, the impact of Policy 1 on the objective that relates to health and amenity is uncertain as it may result in the safeguarding of existing sites which already have some adverse impact on amenity. The impact of policy 2 on the objective which relates to sustainable transport is also considered to be uncertain given that the proximity of the sites to the source of waste arisings is unknown and also because it is unlikely to be logistically feasible and/or economically viable to transport waste to the majority of the identified sites by sustainable modes of the transport given that they are not located in close proximity to a railway line with associated sidings or a navigable waterway with a wharf..

4.3.9 Depending on the nature of the facility proposed, energy recovery can lead to emissions which impact on air quality. As a result, Policy 7 has the potential to have a negative impact on the objective that relates to protecting air quality. Nevertheless, it is acknowledged that other policies in the Plan and stringent emission standards should mean that the

incorporation of measures to minimise greenhouse gas emissions and maximise the use of lower-carbon energy sources / generation does not have unacceptable impact on air quality.

Table 13: Conclusions from the Appraisal of the Policies

1. Safeguarding of Existing Waste Management Sites By helping to ensure that there are sufficient waste management facilities to manage North London's waste, the policy has the potential to have a positive impact on the objective of managing waste sustainability, maximising self-sufficiency in the management of waste, minimising the production of waste and increasing re-use, recycling and recovery rates. It is however recognised that the policy may safeguard sites which accommodate facilities that do not manage waste at the optimal level in the Waste Hierarchy. The policy also has the potential to have a positive effect on the objectives that relate to sustainable transport and mitigating climate change by reducing the need for waste to be transported outside of the Plan area. However, there is a low level of certainty of this impact as the source of waste arisings is unknown and may originate from outside the plan area. The policy could also have a positive effect on the objective of ensuring the efficient use of land and the sustainable use of existing resources by reducing the likelihood of new sites needing to be identified to manage North London's waste. It is unlikely to have a negative impact on any of the objectives but the impact on the objective that relates to health and amenity is uncertain as the policy may result in the safeguarding of existing sites which already have some adverse impact on amenity. It is however recognised that in such instances it may be the nature of the facility rather than the site itself which is causing amenity problems. In addition, the release of these sites may cause capacity management problems for the plan area. As such, no mitigation measures are suggested to address this.
2. Site Allocations The policy has the potential to have a positive impact on a wide range of objectives. In particular, by requiring waste management development on these sites to result in the highest practicable level of recycling and recovery of materials, the policy has the potential to have a major positive effect on the objectives that relate to managing waste sustainably and ensuring the efficient and sustainable use of resources. By specifying that applications for waste management development on these sites will be required to be in line with the aims and policies of the NLWP, the London Plan and relevant Local Plan Policies, the policy should also support the objectives that relate to protecting health and amenity; maintaining green infrastructure; conserving the historic environment; maintaining landscapes and townscapes; protecting biodiversity; reducing flood risk; adapting to climate change; and protecting air, water and soil quality. The development and operation of waste management facilities at the identified sites would create employment opportunities which could therefore also have a positive effect on the objective of reducing unemployment and economic disparities. It is envisaged that the policy would not have negative impact on any of the objectives. The impact on the objective that relates to sustainable transport is however uncertain given that the proximity of the sites to the source of waste arisings is unknown and also because it is unlikely to be logistically feasible and/or economically viable to transport waste to half of the sites by sustainable modes of the transport given that they are not located in close proximity to a railway line with associated sidings or a navigable waterway with a wharf.
3. Area Allocations The policy has the potential to have a positive impact on a wide range of objectives. In particular, by requiring waste management development in these areas to result in the highest practicable level of recycling and recovery of materials, the policy has the potential to have a major positive effect on the objectives that relate to managing waste sustainably and ensuring the efficient and sustainable use of resources. By specifying that applications for waste management development in these areas will be required to be in line with the aims and policies of the NLWP, the London Plan and relevant

Local Plan Policies, the policy should also support the objectives that relate to protecting health and amenity; maintaining green infrastructure; conserving the historic environment; maintaining landscapes and townscapes; protecting biodiversity; reducing flood risk; adapting to climate change; and protecting air, water and soil quality. The development and operation of waste management facilities in the identified areas would create employment opportunities which could therefore also have a positive effect on the objective of reducing unemployment and economic disparities.

In addition, by reducing the need for waste to be transported outside of the plan area and by providing scope for the co-location of waste management facilities in close proximity to one another, the policy has the potential to reduce waste miles and have a positive impact on the objective that relates to reducing the need to travel.

It is envisaged that the policy would not have an uncertain or negative impact on any of the objectives.

4. Unallocated Sites

This policy provides a series of criteria for assessing applications for waste management development on sites/areas that have not been identified for this use by the NLWP. It therefore provides a mechanism to help ensure that there are sufficient sites to manage waste within North London and states that these proposals will need to fit within the spatial strategy and contribute to the delivery of the NLWP aims and objectives. Moving waste up the Waste Hierarchy is a key aspect of the NLWP spatial strategy, aims and objectives. As a result, the policy has the potential to have a major positive impact on the objective that relates to managing waste sustainably. The requirement for waste management facilities on unallocated sites to fit within the spatial strategy and be in a location consistent with the site assessment criteria should also ensure that the policy supports the objectives that relate to protecting health and amenity; maintaining green infrastructure; sustainable transport; conserving built heritage; maintaining landscape and townscape character; protecting biodiversity; reducing flood risk; and adapting to climate change.

The policy also has the potential to have a positive effect on the economic objectives that relate to encouraging sustainable economic growth and reducing unemployment. It also provides flexibility in supporting development at locations which may become more suitable for waste use in the future provided other criteria preventing adverse impacts can be satisfied. The policy would not have a negative or uncertain impact on any of the objectives.

5. Re-use & Recycling Centres

This policy promotes the provision of re-use and recycling centres across the Plan area. By seeking to improve the coverage of these facilities the policy has the potential to improve recycling and recovery rates. It could therefore have a major positive effect on the objectives that relate to sustainable waste management and the efficient use of existing resources. Other objectives that the policy has the potential to have a positive impact on are those which relate to reducing unemployment; encouraging sustainable economic growth; mitigating climate change; and reducing the need to travel.

6. Assessment Criteria for Waste Management Development

The policy contains a range of criteria for assessing proposals for waste management facilities and related development. The policy will help minimise the impact of waste management development in North London and will help ensure that it does not result in unacceptable social or environmental impacts. As a result, the policy could support a wide range of objectives, including those which relate to protecting health and amenity; maintaining green infrastructure; sustainable transport; conserving the historic environment; protecting biodiversity; maintaining townscapes and landscapes; reducing flood risk; reducing contributions to climate change; and protecting air, water and soil quality. The policy does not specifically promote development on previously developed land in preference to greenfield sites. As a result, the extent to which it would impact on the objective

that relates to the efficient use of land is uncertain. Consideration should therefore be given to the inclusion of a criteria which gives preference to the use of previously developed land when assessing applications for waste management facilities.
7. Energy Recovery & Decentralised Energy The policy promotes measures to minimise greenhouse gas emissions and to minimise the use of non-renewable energy and requires waste developments to maximise the use of lower-carbon energy sources/generation. As a result, the policy has the potential to have a significant positive impact on the objective or reducing climate change contributions, promoting energy efficiency and increasing the use of energy from sustainable sources. In addition, by supporting efforts to reduce the consumption of resources for energy generation, the policy could also have a major positive effect on the objective that relates to the efficient and sustainable use of natural resources. The policy could also have a positive impact on the objectives that relate to encouraging sustainable economic growth, value recovery, and managing waste sustainably, although the level of certainty that the policy would have a positive impact on the latter objective is not high as the policy promotes the management of waste by recovery which is not as high up the Waste Hierarchy as reusing or recycling. Depending on the nature of the facility proposed, energy recovery can lead to emissions which impact on air quality. As a result, the policy does have the potential to have a negative impact on the objective that relates to protecting air quality. Nevertheless, it is acknowledged that other policies in the Plan and stringent emission standards should mean that the incorporation of measures to minimise greenhouse gas emissions and maximise the use of lower-carbon energy sources / generation does not have unacceptable impact on air quality.

Site Allocations

4.3.10 Policy 2 of the draft NLWP identifies a series of sites that are suitable for waste management development. Each of these sites has been appraised individually. A summary of the conclusions of the appraisal of these sites is provided in Tables 14 and 15. Full details of the assessment are provided in Appendix 4.

Table 14: Summary of the Appraisal of the Site Allocations

Site Ref.	Site Name	SA Objective													
		1	2	3	4	5	6	7	8	9	10	11	12	13	14
B13	Geron Way/Edgware Road	–	0	+	0	0	?	+	0	+	?	+	+	+	?
E04	Bilton Way	–	0	?	0	0	?	–	–	+	–	+	+	+	?
E14	Gibbs Road	–	0	?	0	+	?	–	–	?	–	+	+	+	+
HAC14	Eagle Wharf Road	–	–	+	–	–	?	+	0	+	–	+	+	+	?

4.3.11 As Table 14 demonstrates, each of the proposed site allocations has the potential to have a positive impact on a number of objectives. In particular, each of the proposed allocations would support the objective of managing waste sustainably, maximising self-sufficiency in the management of waste, minimising the production of waste and increasing re-use, recycling and recovery rates. The degree of impact on this objective would however depend on the nature of the waste management facility built on each site. Each proposed allocation would also have a positive effect on the objective that relates to encouraging sustainable economic growth and each of the site would also have a positive impact on the objective that relates to ensuring the efficient use of land and resources.

4.3.12 Each of the sites is however located in close proximity to sensitive receptors and, as a result, depending on the nature of the facility, the use of each of these sites for waste management development has the potential – without effective mitigation applied through the planning and/or environmental permitting processes – to have some negative impact on the objective of protecting people's health, communities and local environmental quality from the adverse effects of waste management. Policy 6 of the NLWP does however include criteria which seek to mitigate the potential impacts of waste management development on amenity and local environmental quality. Each proposed allocation could also have some negative impact on the objective of protecting and improving air, water and soil quality. In addition, as sites E04, E14 and E20 are all wholly or partly at a medium risk of flooding, directing waste management development to these locations has the potential to have a negative effect on the objectives that relate to flood risk and adapting to climate change.

4.3.13 Sites B13 and HAC14 are considered to offer the most potential for waste to be transported to the sites by sustainable modes of transport. As such, these sites are considered to have the potential to have a positive impact on the objective that relates to sustainable transport. As site E14 is currently vacant, this site is considered to have the most potential to result in a net increase in employment opportunities if it was developed for a waste management facility. Consequently, this proposed allocation has the potential to have a positive impact on the objective of reducing unemployment and deprivation.

Table 15: Conclusions from the Appraisal of the Site Allocations

B13: Geron Way/Edgware Road
The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. The site also offers potential to transport waste by rail and could therefore have some positive effect on the objective of promoting sustainable transport. Other objectives that the proposed allocation could have a positive impact on include those that relate to reducing contributions to climate change and reducing flood risk. The proximity to sensitive receptors does however mean that there is the potential for a facility on this site to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. The allocation could also have a negative impact on the objective that relates to protecting and improving air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. The proposed allocation would have an uncertain impact on the objectives that relate to protecting biodiversity and reducing economic disparities.
E04: Bilton Way
The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of

previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources.

The proximity of the site to sensitive receptors does however mean that there is the potential for a facility in this location to have a negative impact on the objective that relates to amenity. Allocating the site for enclosed waste uses only and enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. The site is also at a medium risk of flooding and the allocation could therefore have a negative impact on the objective of reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures.

The allocation could also have a negative impact on the objective that relates to protecting and improving air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. The proposed allocation would have an uncertain impact on the objectives that relate to sustainable transport and protecting biodiversity.

E14: Gibbs Road

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth, generate employment opportunities and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth, ensuring the efficient use of land and resources and reducing unemployment and deprivation. By supporting in the redevelopment of a vacant site, the proposed allocation could also have a positive effect on the objective of enhancing the quality and character of townscapes.

The proximity of the site to sensitive receptors does however mean that there is the potential for a facility in this location to have a negative impact on the objective that relates to amenity. Allocating the site for enclosed waste uses only and enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. The site is also at a medium risk of flooding and the allocation could therefore have a negative impact on the objective of reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures.

The allocation could also have a negative impact on the objective that relates to protecting and improving air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. The proposed allocation would have an uncertain impact on the objectives that relate to sustainable transport, protecting biodiversity and reducing climate change contributions.

HAC14: Eagle Wharf Road

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help

move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. The site also offers potential to transport waste by canal and could therefore have some positive effect on the objective of promoting sustainable transport. Other objectives that the proposed allocation could have a positive impact on include those that relate to reducing contributions to climate change and reducing flood risk.

The proximity to sensitive receptors does however mean that there is the potential for a facility on this site to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. The allocation could also have a negative impact on the objective that relates to protecting and improving air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. Due to the proximity of the site to designated heritage assets and the Regent Canal, the proposed allocation could have a negative effect on the objectives of conserving the historic environment and maintaining townscapes. Key mitigation measures are likely to include the use of heritage assessments and ensuring that the design of any built facility is sympathetic to, and responds to, the adjacent watercourse.

Area Allocations

4.3.14 Policy 3 of the draft NLWP identifies a series of areas that are suitable for waste management development. Each of these areas has been appraised individually. A summary of the conclusions of the appraisal of these areas is provided in Tables 16 and 17. Full details of the assessment are provided in Appendix 5.

Table 16: Summary of the Appraisal of the Area Allocations

Area Ref.	Area Name	SA Objective													
		1	2	3	4	5	6	7	8	9	10	11	12	13	14
B04	Meadow Works	–	0	?	0	0	–	?	?	?	?	+	+	+	?
B05	Oakleigh Road	–	–	?	0	?	?	+	–	?	?	+	+	+	?
B06	Brunswick Industrial Park	–	0	?	0	0	?	?	?	?	–	+	+	+	?
B08	Mill Hill Industrial Estate	–	0	?	0	0	?	?	?	?	?	+	+	+	?
B10	Connaught Business Centre	–	0	?	0	0	–	- -	- -	?	–	+	+	+	?
B11	BT Depot and Jewsons	–	0	?	?	0	–	–	–	?	?	+	+	+	?
E01	Freezywater	–	–	?	0	0	?	?	–	+	–	+	?	+	+
E03	Brimsdown	?	0	?	0	0	–	–	–	+	–	+	+	+	?
E08	Redburn Trading Estate	–	0	?	0	0	–	- -	- -	+	–	+	+	+	?
E09	Meridian Business Park	?	0	?	–	0	–	–	–	+	–	+	+	+	?
E13	Montagu Industrial Area	?	0	?	?	0	–	–	–	+	–	+	+	+	?
E16	Eley's Estate	?	0	?	0	0	–	- -	- -	+	–	+	+	+	?
E18	Commercial Road	–	0	?	0	0	?	+	0	+	?	+	+	+	?
HAC02	Theydon Road	–	0	?	0	0	–	?	?	?	?	+	+	+	?
HAC04	Hackney Downs	–	0	?	–	?	–	+	0	+	–	+	+	+	?
HAC07	Mare Street LSIS	–	0	?	–	0	?	+	0	?	–	+	+	+	?
HAC08	Oak Wharf	–	0	+	0	0	?	+	0	+	–	+	+	+	?
HAR01	Friern Barnet/Pinkham Way	–	–	?	0	–	–	?	–	?	+	+	?	+	+
HAR03	Brantwood Road	?	0	?	0	0	?	–	–	+	–	+	+	+	?
HAR04	Willoughby Lane	–	0	?	0	0	–	–	–	+	–	+	+	+	?
HAR05	North East Tottenham	?	0	?	0	0	–	–	–	+	–	+	+	+	?

WF03	Argall Avenue	–	0	?	0	0	–	- -	- -	+	–	+	+	+	?
WF04	Auckland Road	–	0	+	0	0	–	–	–	+	–	+	+	+	?
HAC09	Bartrip Street LSIS	–	0	?	–	0	?	–	–	+	–	+	+	+	?
HAC13	Palace Close SIL	–	0	?	–	0	?	–	–	+	?	+	+	+	?
WF05	Bus Depot, Temple Mill Lane	–	0	?	0	0	?	- -	- -	?	?	+	+	+	?

4.3.15 As Table 16 demonstrates, each of the proposed area allocations could have a positive impact on a number of objectives. In particular, each of the allocations would support the objective of managing waste sustainably, maximising self-sufficiency in the management of waste, minimising the production of waste and increasing re-use, recycling and recovery rates. The degree of impact on this objective would however depend on the nature of the waste management facility. The overwhelming majority of the proposed allocations would also have a positive effect on the objectives that relates to encouraging sustainable economic growth and ensuring the efficient use of land and resources. A significant proportion of the allocations are also considered to have the potential to have a positive impact on the objective of reducing contributions to climate change.

4.3.16 Very few of the proposed allocations have the potential to have a significant impact on the objective of conserving the historic environment. In addition, as many of the proposed allocations are existing industrial estates, directing waste management development to these locations is unlikely to have a significant impact on the quality and character of landscapes and townscapes.

4.3.17 The majority of the proposed allocations do however have the potential to have some negative impact on the objective that relates to health and amenity due to their proximity to sensitive receptors. Several of the allocations are also at risk of flooding. In particular, areas B10, E08, E16, WF03 and WF05 are wholly or partially at a high risk of flooding. As such, directing waste management development to these locations has the potential to have a particularly significant negative impact on the objectives of reducing flood risk and adapting to climate change. A significant number of the allocations are also considered to have the potential to have some negative effect on the objective of protecting and improving air, water and soil quality.

Table 17: Conclusions from the Appraisal of Area Allocations

B04: Meadow Works

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources.

The proximity to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. Due to the proximity of the area to a designated SINC, the proposed allocation

could have a negative effect on the objective of protecting biodiversity. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are likely to be important mitigation measures. The proposed allocation would have an uncertain impact on the objectives that relate to sustainable transport, flood risk, climate change and air, water and soil quality.

B05: Oakleigh Road

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It would also result in development being directed to areas at a low risk of flooding and could therefore have a positive impact on the objective of reducing flood risk.

The proximity to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. Depending on which part of the area is developed, directing waste management development to this location could result in the loss of green infrastructure features and have a negative effect on the objectives that relate to green infrastructure and adapting to climate change. Incorporating appropriate boundary treatments / landscaping are likely to be important mitigation measures. The proposed allocation would have an uncertain impact on the objectives that relate to sustainable transport, townscape character, flood risk, climate change, reducing unemployment and protecting air, water and soil quality.

B06: Brunswick Industrial Park

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources.

The proximity to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility could help mitigate impacts. The proposed allocation would have an uncertain impact on the objectives that relate to sustainable transport, biodiversity, flood risk, climate change and unemployment.

B08: Mill Hill Industrial Estate

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources.

The proximity to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. The proposed allocation would have an uncertain impact on several objectives, including those which relate to sustainable transport, biodiversity, flood risk, climate change, unemployment and protecting air, water and soil quality.

B10: Connaught Business Centre

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources.

The proximity to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. Due to the proximity of the area to a designated SINC, the proposed allocation could have a negative effect on the objective of protecting biodiversity. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are likely to be important mitigation measures. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility could help mitigate impacts. In addition, as parts of the area are at a medium/high risk of flooding, the proposed allocation would also have a significant negative impact on the objectives that relate to reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures.

The proposed allocation could also have an uncertain impact on the objectives relating to sustainable transport and reducing contributions to climate change.

B11: BT Depot and Jewsons

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources.

The proximity of the area to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. Due to the proximity of the area to a designated SINC, the proposed allocation could have a negative effect on the objective of protecting biodiversity. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are likely to be important mitigation measures. In addition, as parts of the area are at a medium risk of flooding, the proposed allocation would also have a negative impact on the objectives that relate to reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the incorporation of SuDS or

other techniques to manage surface water runoff will be key mitigation measures.

The proposed allocation could also have an uncertain impact on the objective relating to sustainable transport, built heritage, reducing contributions to climate change, reducing unemployment and protecting air, water and soil quality.

E01: Freezywater

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and could also support the creation of additional employment opportunities. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and reducing unemployment. It also has the potential to have some positive impact on the objective of reducing contributions to climate change.

The proximity of the area to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. Due to the proximity of the area to a designated SINC, the proposed allocation could have a negative effect on the objective of protecting biodiversity. Undertaking appropriate ecological surveys are likely to be an important mitigation measure. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. Furthermore, although the site is a Strategic Industrial Location that comprises principally of previously developed land, there is a large parcel of land towards the east of the site which is likely to be considered to be greenfield land. If directing waste management facilities to this location resulted in the development of this parcel of land it would lead to the loss of a greenfield site that has the potential to form part of the green infrastructure network. As a result, the proposed allocation has the potential to have a negative impact on the objective that relates to maintaining green infrastructure. The possible loss of this area of green spaces also means that the proposed allocation has the potential to have some negative impact on the objective of adapting to climate change. Incorporating appropriate planting/landscaping and other green infrastructure features are likely to be key mitigations measures.

The proposed allocation could also have an uncertain impact on the objectives relating to sustainable transport, biodiversity and flood risk. In addition, as directing waste management development to this area could either result in the redevelopment of previously developed land or lead to the loss of a greenfield site, the proposed allocation would have an uncertain impact on the objective that relates to the efficient use of land.

E03: Brimsdown

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact on the objective of reducing contributions to climate change.

Due to the proximity of the area to a designated SINC, the proposed allocation could have a negative effect on the objective of protecting biodiversity. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are likely to be important mitigation measures. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. In addition, as parts of the area are at a medium risk of flooding, the proposed allocation would also have a negative impact on the objectives that relate to reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures.

The proposed allocation could also have an uncertain impact on the objective relating to sustainable transport. Although parts of the area are in close proximity to sensitive receptors, the impact of the allocation on the objective that relates to health and amenity is considered to be uncertain as given the size of the area, waste management development could potentially take place in a part of the area that is a significant distance from these residential properties which could avoid impact on amenity.

E08: Redburn Trading Estate

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact on the objective of reducing contributions to climate change.

The proximity to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. Due to the proximity of the area to a designated SINC, the proposed allocation could have a negative effect on the objective of protecting biodiversity. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are likely to be important mitigation measures. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. In addition, as parts of the area are at a high risk of flooding, the proposed allocation would also have a significant negative impact on the objectives that relate to reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures.

The proposed allocation could also have an uncertain impact on the objective relating to sustainable transport.

E09: Meridian Business Park

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help

move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact on the objective of reducing contributions to climate change.

Due to the proximity of the area to a designated SINC, the proposed allocation could have a negative effect on the objective of protecting biodiversity. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are likely to be important mitigation measures. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. In addition, as parts of the area are at a medium risk of flooding, the proposed allocation would also have a negative impact on the objectives that relate to reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures. The allocation could also result in waste management development taking place within the setting of a number of heritage assets. As a result, it has the potential to have a negative impact on the objective that relates to conserving the historic environment. A key mitigation measure will be to ensure that appropriate heritage impact assessments are undertaken and that the design of any built facility is sympathetic to the setting of these heritage assets.

The proposed allocation could also have an uncertain impact on the objective relating to sustainable transport. Although parts of the area are in close proximity to sensitive receptors, the impact of the allocation on the objective that relates to health and amenity is considered to be uncertain as given the size of the area, waste management development could potentially take place in a part of the area that is a significant distance from these residential properties which could avoid impact on amenity.

E13: Montagu Industrial Area (North)

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact on the objective of reducing contributions to climate change.

Due to the proximity of the area to a designated SINC, the proposed allocation could have a negative effect on the objective of protecting biodiversity. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are likely to be important mitigation measures. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. In addition, as parts of the area are at a medium risk of flooding, the proposed allocation would also have a negative impact on the objectives that relate to reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation

measures.

The proposed allocation could also have an uncertain impact on the objectives relating to sustainable transport and built heritage. Although parts of the area are in close proximity to sensitive receptors, the impact of the allocation on the objective that relates to health and amenity is considered to be uncertain as given the size of the area, waste management development could potentially take place in a part of the area that is a significant distance from these residential properties which could avoid impact on amenity.

E16: Eley's Estate

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact on the objective of reducing contributions to climate change.

Due to the proximity of the area to a designated SINC, the proposed allocation could have a negative effect on the objective of protecting biodiversity. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are likely to be important mitigation measures. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. In addition, as parts of the area are at a medium/high risk of flooding, the proposed allocation would also have a significant negative impact on the objectives that relate to reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures.

The proposed allocation could also have an uncertain impact on the objective relating to sustainable transport. Although parts of the area are in close proximity to sensitive receptors, the impact of the allocation on the objective that relates to health and amenity is considered to be uncertain as given the size of the area, waste management development could potentially take place in a part of the area that is a significant distance from these residential properties which could avoid impact on amenity.

E18: Commercial Road

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact on the objective of reducing contributions to climate change. In addition, the proposed allocation also has the potential to have a positive impact on the objective of reducing flood risk as it would result in development being directed to an area that is at a low risk of flooding.

The proximity of the area to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing

appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. The proposed allocation could also have an uncertain impact on the objectives relating to sustainable transport, biodiversity, unemployment and protecting air, water and soil quality.

HAC02: Theydon Road

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources.

The proximity of the area to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. The area is also in close proximity to a designated SINC and the proposed allocation could therefore have a negative effect on the objective of protecting biodiversity. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are likely to be important mitigation measures. The proposed allocation could also have an uncertain impact on the objectives relating to sustainable transport, flood risk, climate change, reducing unemployment and protecting air, water and soil quality.

HAC04: Hackney Downs

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact on the objective of reducing contributions to climate change. In addition, the proposed allocation also has the potential to have a positive impact on the objective that relates to sustainable travel. Furthermore, the proposed allocation also has the potential to have a positive impact on the objective of reducing flood risk as it would result in development being directed to an area that is at a low risk of flooding.

The proximity of the area to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. The area is also in close proximity to a designated SINC and the proposed allocation could therefore have a negative effect on the objective of protecting biodiversity. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are likely to be important mitigation measures. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. Due to the proximity of the area to designated heritage assets, waste management development in this location also has the potential to have a negative effect on the objective of conserving the historic environment. A key mitigation measure will be to ensure that appropriate heritage impact assessments are undertaken and that the design of any built facility is sympathetic to the setting of these heritage assets.

The proposed allocation could also have an uncertain impact on the objectives relating to sustainable transport, townscape character and reducing unemployment.

HAC07: Mare Street LSIS

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. In addition, the proposed allocation also has the potential to have a positive impact on the objective of reducing flood risk as it would result in development being directed to an area that is at a low risk of flooding.

The proximity of the area to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. Due to the proximity of the area to designated heritage assets, waste management development in this location also has the potential to have a negative effect on the objective of conserving the historic environment. A key mitigation measure will be to ensure that appropriate heritage impact assessments are undertaken and that the design of any built facility is sympathetic to the setting of these heritage assets.

The proposed allocation could also have an uncertain impact on the objectives relating to sustainable transport, biodiversity, reducing contributions to climate change and reducing unemployment.

HAC08: Oak Wharf

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact on the objective of reducing contributions to climate change. In addition, the proximity of the area to a navigable waterway and an associated wharf means that there is potential for waste to be transported to and from the area by river. As a result, the proposed allocation also has the potential to have a positive impact on the objective that relates to sustainable travel. Furthermore, the proposed allocation also has the potential to have a positive impact on the objective of reducing flood risk as it would result in development being directed to an area that is at a low risk of flooding.

The proximity of the area to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts.

The proposed allocation could also have an uncertain impact on the objectives relating to biodiversity and unemployment.

HAR01: Friern Barnet/Pinkham Way

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and could also support the creation of additional employment opportunities. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and reducing unemployment. In addition, as the redevelopment of the site may present opportunities to remediate land contamination, the proposed allocation also has the potential to have a positive impact on the objective that relates to protecting air, water and soil quality.

The proximity to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. The area, although it previously accommodated a sewage treatment works, has been significantly revegetated, contains a number of mature trees and is designated as a SINC. As a result, its redevelopment has the potential to have some negative impact on the objectives that relate to biodiversity, green infrastructure, townscape character and adapting to climate change. Incorporating appropriate boundary treatments / landscaping, protecting existing green infrastructure features, undertaking appropriate ecological surveys and creating replacement habitat are likely to be important mitigation measures.

The proposed allocation would have an uncertain impact on the objectives that relate to sustainable transport, flood risk, reducing contributions to climate change and ensuring the efficient use of land and natural resources.

HAR03: Brantwood Road

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact on the objective of reducing contributions to climate change.

The proposed allocation could have a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. In addition, as parts of the area are at a medium risk of flooding, the proposed allocation would also have a negative impact on the objectives that relate to reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures.

The proposed allocation could also have an uncertain impact on the objectives relating to sustainable transport, biodiversity and unemployment. In addition, although parts of the area are in close proximity to sensitive receptors, the impact of the allocation on the objective that relates to health

and amenity is considered to be uncertain as given the size of the area, waste management development could potentially take place in a part of the area that is a significant distance from these residential properties which could avoid impact on amenity.

HAR04: Willoughby Lane

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact on the objective of reducing contributions to climate change.

The proximity of the area to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. Due to the proximity of the area to a designated SINC, the proposed allocation could have a negative effect on the objective of protecting biodiversity. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are likely to be important mitigation measures. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. In addition, as parts of the area are at a medium risk of flooding, the proposed allocation would also have a negative impact on the objectives that relate to reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures.

The proposed allocation could also have an uncertain impact on the objective relating to sustainable transport and unemployment.

HAR05: North East Tottenham

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact on the objective of reducing contributions to climate change.

Due to the proximity of the area to a designated SINC, the proposed allocation could have a negative effect on the objective of protecting biodiversity. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are likely to be important mitigation measures. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. In addition, as parts of the area are at a medium risk of flooding, the proposed allocation would also have a negative impact on the objectives that relate to reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the

incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures.

The proposed allocation could also have an uncertain impact on the objective relating to sustainable transport. Although parts of the area are in close proximity to sensitive receptors, the impact of the allocation on the objective that relates to health and amenity is considered to be uncertain as given the size of the area, waste management development could potentially take place in a part of the area that is a significant distance from these residential properties which could avoid impact on amenity.

WF03: Argall Avenue

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact on the objective of reducing contributions to climate change.

The proximity to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. Due to the proximity of the area to a designated SINC, the proposed allocation could have a negative effect on the objective of protecting biodiversity. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are likely to be important mitigation measures. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. In addition, as parts of the area are at a medium/high risk of flooding, the proposed allocation would also have a significant negative impact on the objectives that relate to reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures.

The proposed allocation could also have an uncertain impact on the objective relating to sustainable transport.

WF04: Auckland Road

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact on the objective of reducing contributions to climate change. In addition, the proximity of the area to a railway line suitable for freight traffic and a depot mean that there is potential for waste to be transported to and from the area by rail. As a result, the proposed allocation also has the potential to have a positive impact on the objective that relates to sustainable travel.

The proximity of the area to sensitive receptors does however mean that there is the potential for a

facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. Due to the proximity of the area to a designated SINC, the proposed allocation could have a negative effect on the objective of protecting biodiversity. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are likely to be important mitigation measures. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. In addition, as parts of the area are at a medium risk of flooding, the proposed allocation would also have a negative impact on the objectives that relate to reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures.

The proposed allocation could also have an uncertain impact on the objective relating to unemployment.

HAC09: Bartrip Street LSIS

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact on the objective of reducing contributions to climate change.

The proximity of the area to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. Due to the proximity of the area to designated heritage assets, waste management development in this location has the potential to have a negative effect on the objective of conserving the historic environment. A key mitigation measure will be to ensure that appropriate heritage impact assessments are undertaken and that the design of any built facility is sympathetic to the setting of these heritage assets. Other objectives that the proposed allocation has the potential to have a negative impact on include those which relate to flood risk, adapting to climate change and protecting air, water and soil quality. The completion of a suitable Flood Risk Assessment, application of the Sequential Test, the incorporation of SuDS or other techniques to manage surface water runoff and the use of measures such as negative air pressure and rapid-closure doors will be key mitigation measures.

The proposed allocation would have an uncertain impact on the objectives that relate to sustainable transport, biodiversity and unemployment.

HAC13: Palace Close SIL

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources. It also has the potential to have some positive impact

on the objective of reducing contributions to climate change.

The proximity of the area to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. Due to the proximity of the area to designated heritage assets, waste management development in this location has the potential to have a negative effect on the objective of conserving the historic environment. A key mitigation measure will be to ensure that appropriate heritage impact assessments are undertaken and that the design of any built facility is sympathetic to the setting of these heritage assets. Other objectives that the proposed allocation has the potential to have a negative impact on include those which relate to flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures.

The proposed allocation would have an uncertain impact on the objectives that relate to sustainable transport, biodiversity, unemployment and protecting air, water and soil quality.

WF05: Bus Depot, Temple Mill Lane

The proposed allocation has the potential to have a positive impact on a number of sustainability objectives. In particular, the development of a waste management facility in this location would help move waste up the Waste Hierarchy and help ensure that there are sufficient facilities to meet the Waste Plan's capacity needs. It would also encourage local economic growth and support the use of previously developed land. The allocation therefore has the potential to have a positive effect on the objectives that relate to managing waste sustainably, encouraging sustainable economic growth and ensuring the efficient use of land and resources.

The proximity to sensitive receptors does however mean that there is the potential for a facility in this area to have a negative impact on the objective that relates to amenity. Enforcing appropriate controls through planning conditions and environmental permitting are therefore likely to be key mitigation measures. There could also be a negative impact on the objective of protecting air, water and soil quality. The extent of impact on this objective would be dependent on the nature of the proposed waste management facility but the use of measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site could help mitigate impacts. In addition, as parts of the area are at a medium/high risk of flooding, the proposed allocation would also have a significant negative impact on the objectives that relate to reducing flood risk and adapting to climate change. The completion of a suitable Flood Risk Assessment, application of the Sequential Test and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures.

The proposed allocation could also have an uncertain impact on the objectives relating to sustainable transport, biodiversity, reducing contributions to climate change and protecting air, water and soil quality.

4.4 Secondary, Cumulative and Synergistic Effects

4.4.1 Under the provisions of the SEA Directive, when appraising the sustainability of a Plan it is necessary to consider whether or not there are any secondary, cumulative and/or synergistic effects. A number of these effects have been identified during the appraisal of the NLWP and are identified in the Appendices document which accompanies this report. Many of these effects are secondary. For example:

- Certain sites and areas were identified as having the potential to receive waste by sustainable modes of transport which could reduce road transport and have positive secondary impacts on congestion, air quality and greenhouse gas emissions from the transport sector;
- Many of the policies and sites/areas in the draft NLWP would encourage higher rates of reuse, recycling and recovery which would have a positive secondary impact of reducing the need to identify sites for landfill (either within or outside of the Plan area); and
- Certain proposed allocations have the potential to have an impact on townscape character which would have secondary impacts on perceptions of the area.

4.4.2 There were also several instances where potential cumulative impacts were identified. In particular, it was recognised that directing waste management uses to existing industrial estates could result in some cumulative impacts with surrounding employment uses, particularly in relation to traffic, dust, noise, etc.

4.5 Mitigation Proposals

4.5.1 Whilst carrying out the SA of the draft NLWP a number of mitigation proposals and suggested changes to the Plan have been identified which address issues that have come to light. These are documented in the accompanying Appendices Report and a summary of the key mitigation measures are summarised in Table 18 below.

4.5.2 These suggested mitigation measures should be considered when preparing the Regulation 19 draft NLWP and should be considered alongside all comments received during the Regulation 18 consultation which this SA supports. None of the proposed changes seeks to significantly alter the purpose of Plan and many relate to measures that can be taken during the implementation of the plan to mitigate or avoid unacceptable impacts.

Table 18: Mitigation Proposals

Policy	Mitigation/Change Proposed	Affects
Policy 6: Assessment Criteria for Waste Management Facilities and Related Development	Consider amending the policy to make reference to avoiding adverse impacts on the integrity of SSSI and SINCs.	Policy
Policy 6: Assessment Criteria for Waste Management Facilities and Related Development	Consider amending the policy to require applications for waste management facilities to avoid areas of highest flood risk.	Policy
Policy 6: Assessment Criteria for Waste Management Facilities and Related	Consider amending the policy to prioritise the use of previously developed land in preference to greenfield sites	Policy

Development		
Policy 6: Assessment Criteria for Waste Management Facilities and Related Development	Consider amending the policy wording to require the fullest *practicable* contribution to climate change mitigation.	Policy
Sites and Areas	Allocate site for enclosed waste uses only and enforce appropriate controls through planning conditions and environmental permitting.	Several Sites and Areas
Sites and Areas	Incorporate SuDS or other techniques to manage surface water runoff. Ensure the appropriate application of the Sequential Test.	Several Sites and Areas
Sites and Areas	Ensure appropriate heritage impact assessments are undertaken and that the design of any built facility is sympathetic to the setting of these heritage assets.	Several Sites and Areas

5. MONITORING

5.1 The Localism Act has removed section 35(1) of the Planning and Compulsory Purchase Act 2004 which required local planning authorities to produce an Annual Monitoring Report for submission to the Secretary of State. There is still however a requirement for planning authorities to prepare reports containing information as to the extent to which the policies set out in their Local Plans are being achieved. The National Planning Policy for Waste also identifies the need to monitor and report on the take-up of allocated sites and areas; changes in the available waste management capacity as a result of closures and new permissions; and the quantities of controlled wastes i.e. LACW, C&I, CDEW being created locally and how they are being managed.

5.2 The sustainability effects of implementing the NLWP should also be monitored on an annual basis and reported through each Borough's monitoring reports. At this stage in the SA process there is only a need to present 'a description of the measures envisaged concerning monitoring'. An initial range of criteria for monitoring the sustainability effects of implementing the NLWP was proposed in the SA Scoping Report. These potential monitoring criteria are presented in Table 19 below.

Table 19: Monitoring Indicators

SA Objective	Decision-Making Criteria	Indicators
1. To protect people's health, communities and local environmental quality from the adverse effects of waste management.	Will the plan/proposal have an adverse impact on levels of nuisance including dust, particulate emissions, noise (including traffic noise), vibration, visual amenity and light pollution? Will it redress environmental inequalities within the plan area?	Number of substantiated complaints to North London Borough's relating to waste development nuisances (noise, dust, light, vermin and odour). Number of fly tipping incidents in the Plan area.
2. To maintain green infrastructure and open space	Will the plan/proposal support the creation of healthier lifestyles through, for example, the provision of new or improved open space? Will it have an adverse impact on the green infrastructure network? Will it lead to a loss of open space / reduction in public access?	Net area of open space and green space permanently lost/created in North London as a result of new waste management facilities.

SA Objective	Decision-Making Criteria	Indicators
3. To promote sustainable modes of transport, reduce the need to travel and improve choice and use of more sustainable transport modes.	Will the plan/proposal reduce overall transport distances for waste? Will it reduce waste-related car and lorry traffic and increase sustainable transport use? Will it reduce/increase road congestion?	Number of permitted sites that use alternative means of transport other than road. Amount of waste transported by rail/water. Waste exported, imported and dealt with within Plan area. Percentage of waste transported by road, rail and water Tonne miles of waste that are transported by road, rail and water
4. To conserve and enhance the historic environment, heritage assets and their settings.	Will the plan/proposal have an adverse impact upon heritage assets and/or their setting?	Number of designated heritage assets (including conservation areas, listed buildings, SAMs and registered parks and gardens) adversely affected by waste development.
5. To maintain and enhance the quality and character of North London's townscapes and landscapes.	Will the plan/proposal have an adverse impact on local landscape character or on townscapes? Will it have an adverse affect on the openness of the Green Belt? Will it affect areas of public open space? Will it lead to landscape/townscape improvements? Will it result in development that is sympathetic to its surroundings?	Number of permitted sites judged to have an adverse impact on local landscape character/conservation areas. Number of permitted sites resulting in the redevelopment of a vacant or derelict site. Area of Green Belt lost to waste development. Area of open space lost to waste development.
6. To maintain, protect and enhance biodiversity, protected species, habitats, geodiversity and features of geological interest.	Will the plan/proposal have an adverse impact upon protected sites or species? Will it restore or create new habitat? Will it lead to the loss of, or impact on the integrity of, BAP habitats or species?	Number, total area and condition of internationally and nationally designated sites (SSSIs, SPAs, SACs) and those of local importance (SINCs, LNRs). Area of new habitat created through waste planning applications/restoration schemes.

SA Objective	Decision-Making Criteria	Indicators
		Change in priority habitats and population of local Biodiversity Action Plan (BAP) species. Area of UKBAP and LBAP habitats created as part of waste development.
7. To reduce and manage flood risk	Will the plan/proposal help to avoid inappropriate development in areas at risk of flooding? Will it exacerbate vulnerability to flooding? Will the plan reduce flood risk through the use of SUDS? Will the plan involve the reconfiguration of existing sites or development of a flood alleviation scheme?	Number of waste facilities development within EA Flood Zones 2 and 3 and within Critical Drainage Areas/Local Flood Risk Zones. Number of sites permitted against Environment Agency flood advice. Number of schemes incorporating Sustainable Drainage Schemes (SuDS).
8. To adapt to, and reduce the impacts of, climate change.	Will the plan/proposal help to reduce vulnerability to the impacts of climate change?	Number of permitted sites that include climate adaptation measures (e.g. to cope with heat, flood, storms)
9. To reduce contributions to climate change, promote energy efficiency and increase the use of energy from sustainable sources.	Will the plan/proposal increase emissions of greenhouse gases from waste activities? Will it reduce emissions of greenhouse gases? Will it encourage the use and/or production of renewable energy? Will it reduce waste-related car and lorry traffic and increase sustainable transport use?	Number of facilities generating energy from waste. Average distance travelled by LACW for treatment/disposal. Number of permitted sites that include renewable energy generation technologies. The number and capacity of Combined Heat and Power (CHP) facilities.
10. To protect and improve air quality, water quality and soils.	Will the plan/proposal have an adverse impact on air quality? Will it reduce/increase road congestion? Will the plan/proposal have an adverse impact on surface or ground water quality? Will it improve existing water	Location and area of Air Quality Management Areas. Number of days when air pollution is moderate or higher. Number of days when the air quality threshold value of PM_{10} is exceeded. Quality of local watercourses.

SA Objective	Decision-Making Criteria	Indicators
	quality? Will the plan/proposal support the remediation of contaminated land? Will it have an adverse impact on soil quality?	Number of sites permitted within groundwater protection zones. Number and area of contaminated sites remediated as a consequence of waste-related development Number of sites permitted in areas of worsening air quality
11. To manage waste sustainably, maximise North London's self-sufficiency in the management of waste, minimise the production of waste and increase re-use, recycling and recovery rates.	Will the plan/proposal minimise the production of waste? Will it promote sustainable waste management and encourage movement of waste up the Waste Hierarchy?	Annual waste arisings by type. Estimated permitted treatment and disposal capacity in North London. The quantity of new capacity added at each level of the Waste Hierarchy Average distance travelled by LACW for treatment/disposal. Waste dealt with within the Plan area Volume and % of waste disposed to landfill by waste stream.
12. To ensure the efficient use of land and natural resources and the sustainable management of existing resources.	Will the plan/proposal make use of previous developed land or buildings? Will it increase demand for water? Will it incorporate/encourage measures to ensure water is used efficiently?	Proportion of new waste development on previously developed land. Proportion of existing and new waste developments with water efficiency measures.
13. To encourage sustainable economic growth, exploit the growth potential of business sectors and improve the competitiveness and productivity of the local waste industry	Will the plan/proposal encourage sustainable economic growth through provision of adequate waste management facilities? Will the plan/proposal diversify the economy in terms of the waste management sector? Will it enable new and innovative	Economic output of Gross Value Added (GVA) per capita per annum Number of new jobs created by new waste sites. Annual waste arisings by type. Capacity of new waste

SA Objective	Decision-Making Criteria	Indicators
	waste management technologies to be developed and utilised? Will it enable maximum value recovery from waste where possible? Will it promote waste minimisation?	management facilities by type. Number of businesses and new facilities introducing new waste management technologies at the top of the Waste Hierarchy e.g. Anaerobic Digestion with energy/heat generation.
14. To reduce economic disparities, unemployment and deprivation	Will the plan/proposal support the creation of a broad range of jobs and employment opportunities?	Number of new jobs created by new waste sites or by growth of existing ones.

5.3 In addition to monitoring the implementation of the NLWP, it is also proposed that the Waste Data Study (the comparison of available capacity with current and future waste management needs) that informs the Plan should be updated at two year intervals as a further systematic check on progress.

5.4 Responsibility for monitoring will lie with the individual Boroughs and this will provide a basis for the:

- Identification of unforeseen adverse effects and any necessary remedial action;
- Assessment of whether the Strategy is achieving the SA objectives; and
- Assessment of the performance of mitigation measures.

6. NEXT STEPS

6.1 This section of the report explains the next steps that will be taken as part of the preparation and SA of the NLWP.

6.2 To enable the community and other stakeholders to contribute to the production of the NLWP, the Council is inviting representations on this Interim SA Report in parallel with consultation on the draft Plan. This period of consultation will take place between XX and XX.

6.3 Comments can be submitted using the following methods:

By email: feedback@nlwp.net (preferred method)

By post: Archie Onslow
North London Waste Plan
LB Camden Culture & Environment
Town Hall
Argyle Street
London
WC1H 8EQ.

6.4 Following consideration and analysis of the consultation responses received, a 'Proposed Submission' version of the Plan will be produced and 'published' in-line with Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012. This will be a version of the NLWP that the boroughs are proposing to submit to the Secretary of State for examination. This document will be appraised through the SA process and will be published to provide an opportunity for comments to be made on the version of the Plan that the boroughs wish to proceed with. Representations at this stage will be sought on the soundness of the Local Plan and its legal and procedural compliance.

6.5 Following Publication, it is the intention that the Plan will be 'Submitted' for Examination in Public (EiP). Once the plan is submitted an independent Planning Inspector will be appointed by the Government to examine whether the NLWP meets the required legal and soundness tests including duty to co-operate and procedural requirements. Assuming that the Inspector does not request that further work be undertaken in order to achieve soundness, it is expected that the Plan will be formally adopted in May 2017. At the time of adoption an SA 'Statement' must be published. This Statement will set out:

- How environmental considerations have been integrated into the plan;
- How the environmental report has been taken into account;
- How opinions expressed in response to consultations have been taken into account;
- The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives considered; and

- The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan.

7. DIFFERENCE THAT THE PROCESS HAS MADE

7.1.1 SA provides an iterative process for checking that an emerging Plan is sustainable as envisaged by government guidance and legislation, and in the context of the key local sustainability issues identified at the outset of the process.

7.1.2 This interim SA has provided an appraisal of a number of alternative options in relation to the strategic approach of the NLWP and has also provided an assessment of the proposed policies and allocations in the early draft version of the Plan. Although the SA process concluded that the draft NLWP has the potential to deliver a wide range of social, environmental and economic benefits, it also identified several instances where there is a potential negative impact on sustainability objectives, a number of uncertain impacts and a range of opportunities for further enhancements to improve the NLWP's sustainability.

7.1.3 These specific recommendations will be considered when preparing the Regulation 19 draft NLWP alongside all comments received during the Regulation 18 consultation which this SA supports.

7.1.4 Although these recommendations may result in some amendments to the Plan, they do not seek to significantly alter the purpose of Plan and many relate to measures that can be taken during the implementation of the plan to mitigate or avoid unacceptable impacts.