



## COUNCIL MEETING - 3 MARCH 2022

Councillors of the London Borough of Islington are summoned to attend a meeting of the Council to be held in the Council Chamber, Islington Town Hall, Upper Street, London N1 2UD on **3 March 2022 at 7.30 pm.**

**Chief Executive**

### AGENDA

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The Minutes of the previous meeting held on 9 December 2021.	
2. Declarations of Interest	
If you have a <b>Disclosable Pecuniary Interest*</b> in an item of business:	
▪ if it is not yet on the council's register, you <b>must</b> declare both the existence and details of it at the start of the meeting or when it becomes apparent;	
▪ you may <b>choose</b> to declare a Disclosable Pecuniary Interest that is already in the register in the interests of openness and transparency.	
In both the above cases, you <b>must</b> leave the room without participating in discussion of the item.	
If you have a <b>personal</b> interest in an item of business <b>and</b> you intend to speak or vote on the item you <b>must</b> declare both the existence and details of it at the start of the meeting or when it becomes apparent but you <b>may</b> participate in the discussion and vote on the item.	

- \***(a) Employment, etc** - Any employment, office, trade, profession or vocation carried on for profit or gain.
- (b) Sponsorship** - Any payment or other financial benefit in respect of your expenses in carrying out duties as a member, or of your election; including from a trade union.
- (c) Contracts** - Any current contract for goods, services or works, between you or your partner (or a body in which one of you has a beneficial interest) and the council.
- (d) Land** - Any beneficial interest in land which is within the council's area.
- (e) Licences** - Any licence to occupy land in the council's area for a month or longer.
- (f) Corporate tenancies** - Any tenancy between the council and a body in which you or your partner have a beneficial interest.
- (g) Securities** - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

This applies to **all** members present at the meeting.

3. Mayoral Announcements

- (i) Apologies
- (ii) Order of business
- (iii) Declaration of discussion items
- (iv) Mayor's announcements
- (v) Length of speeches

4. Leader's Announcements

5. Petitions

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11.	Chief Whip's Report	TO FOLLOW
12.	Budget Proposals 2022/23 and Medium Term Financial Strategy	413 - 594

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Despatched : 23 February 2022

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# Public Document Pack Agenda Item 1

## LONDON BOROUGH OF ISLINGTON

### COUNCIL MEETING - 9 DECEMBER 2021

#### MINUTES OF PROCEEDINGS

At the meeting of the Council held at Council Chamber, Town Hall, Upper Street, N1 2UD on 9 December 2021 at 7.30 pm.

#### Present:

Champion	Hyde	Poole
Chowdhury	Ismail	Poyser
Comer-Schwartz	Jeapes	Russell
Debono	Lukes	Ward
Gallagher	Nathan	Williamson
Gantly	Ngongo	Woolf
Gill	O'Halloran	Jackson
Heather	Picknell	

#### The Mayor (Councillor Troy Gallagher) in the Chair

#### 163 MINUTES

##### RESOLVED:

That the minutes of the previous meeting on 23 September 2021 and the Awards Council (Freedom of the Borough) meeting on 18 October 2021 be agreed as a correct record and the Mayor be authorised to sign them.

#### 164 DECLARATIONS OF INTEREST

None.

#### 165 MAYORAL ANNOUNCEMENTS

##### (i) Apologies

The Mayor explained that not all members were able to attend because the capacity of the Council Chamber had been reduced to accommodate social distancing measures.

(ii) & (iii) Order of business & Declaration of discussion items

The Mayor advised that Motion 6, 'Repeal Islington Council's Low Traffic Neighbourhoods', would be considered after Item 5, Petitions.

Due to the volume of business to be considered, it was also noted that the Council may give priority to motions that had received amendments, to ensure that there could be fair debate on these items before the end of the meeting.

(iv) Mayor's announcements

The Mayor highlighted a number of meetings and events he had attended over recent weeks. The Mayor thanked representatives from his charities James' Place and Forum+, who were in attendance and would speak about their work later in the meeting.

The Mayor was delighted to launch the annual Poppy Appeal and was humbled and honoured to attend a number of remembrance events, culminating in Remembrance Sunday. The Mayor was very pleased that the remembrance events were well attended and thanked all of those involved in the events, including the Islington Veterans Association, local cadets, council officers and councillors. The Mayor also thanked Cllr Poole, as Armed Forces Champion, for his support to the events.

The Mayor was delighted to launch the Reading Adventure, which encourages young people to be engaged in reading, and had also given out awards for the Summer Reading Challenge.

The Mayor had attended the London Political African Conference with Cllr Ismail and the Speaker of Hackney and had discussed how we can best support African communities in London.

The Mayor had attended the Dickens Museum to see the wonderful Oliver Twist exhibition. Local schools had contributed to the mural to raise awareness of food poverty. The Mayor was pleased that Islington's young people had a great understanding of food poverty, environmental issues, and the need to give back to the local community and help the less well-off.

The Mayor had attended a number of events at the Irish Embassy, including an event to celebrate 35 years of the International Fund for Ireland, which promoted modern economic and social advancement while encouraging continued contact and dialogue across communities in Northern Ireland.

The Mayor had attended Islington Carers Hub to speak to young people and share his experiences as a teenager.

The Mayor was also pleased to attend a menorah candle lighting to celebrate Chanukah alongside the Leader and Islington's Jewish communities. The Mayor had also attended the festive light switch on across the borough. The Mayor asked that those present use the festive period to reflect on their own wellbeing, to support those

who needed additional help at this time of year, and wished the very best to everyone for the festive period.

(v) Length of speeches

The Mayor reminded councillors to keep within the permitted length for speeches. The Mayor also noted that the meeting was being webcast on the council's website for those who were unable to attend in person.

**166** LEADER'S ANNOUNCEMENTS

The Leader noted that for the third successive meeting not all councillors were able to participate in the Council meeting as the government had not taken action to allow councillors to participate in meetings virtually. The Leader said this was particularly unfair for councillors who may be vulnerable to Covid, and noted concern at the recent rise in cases.

The Leader thanked the Mayor for his service to the borough. The Leader had been pleased to join the Mayor at several events, including the lighting of the Menorah at Islington Green to celebrate the start of Chanukah. The Leader was also pleased to attend the Mayor's Charity Dinner; the work of the Mayor's charities was admirable and the Leader looked forward to hearing more about their work later in the meeting. These charities did brilliant work to support some of the most vulnerable people in the borough and this mirrored the values of the Council.

The Leader spoke about the cost of living crisis and expressed concern for local people experiencing financial hardship. The government had cut universal credit payments at a time when people are still recovering from the financial effects of the pandemic; this had made life even more difficult for families on low incomes, alongside rising energy costs, high levels of inflation and food shortages in supermarkets.

The Leader was pleased that Islington offered one of the most generous resident support schemes in the country, and to further assist those families on lower incomes, the Leader announced that the Council would be distributing £200 supermarket vouchers to nearly 6,000 households in Islington most in need of support. The Council would also fund free school meals vouchers for eligible families through the school holidays.

The Leader wished everyone in Islington a peaceful and joyous festive break.

**167** PETITIONS

A petition was received from Jody Graber containing objections to the council's People Friendly Streets scheme.

A petition was received from Rachael Swynnerton relating to promoting biodiversity and objecting to the spraying of glyphosate weed killer.

A petition was received from Martin Franklin objecting to the North London Waste Authority's Head and Power Project, which included plans for a new incinerator facility being developed in Edmonton.

**168 NOTICES OF MOTION**

The Mayor reminded councillors that this item of business was being brought forward on the agenda.

Motion 6: Repeal Islington Council's Low Traffic Neighbourhoods

Councillor Ismail moved the motion. Councillors Russell and Champion contributed to the debate. Councillor Ismail exercised her right of reply.

The motion was put to the vote and was rejected.

**169 QUESTIONS FROM MEMBERS OF THE PUBLIC**

Question (1) from Melissa Hetherington to Cllr Champion, Executive Member for Environment & Transport was withdrawn prior to the meeting,

**Question (2) from Helena Farstad to Cllr Ward, Executive Member for Housing & Development:**

Buildings (commercial and residential) are the largest source of carbon emissions in Islington. Without addressing Islington's leaky properties Islington Council will not meet its 2030 net zero carbon target without major offsetting. When is the Councillor planning for the work to commence retrofitting the buildings and 25,000 homes under direct Council control; and how will he approach the challenge of convincing the remaining 78,000 or so households to do the same?

**Response:**

Thank you for your question. Islington Council is focused on tackling the housing crisis for local people, as well as the climate crisis, and the housing crisis caused by this government. A key part of that work is ensuring that our housing stock is of the highest possible standard. We are working with University College London to develop a strategic roadmap and options for decarbonising all of our Council housing stock. The project with UCL will also look at the feasibility and approach to minimising carbon footprints within our housing estates. This work built on our extensive ongoing programme of insulation and energy efficiency in our stock, which means that over 20,000 of those homes have achieved an EPC rating of C or above. In parallel to our work with UCL, we will be undertaking large-scale trials of low carbon heating solutions on pilot estates that we are currently in the process of selecting.

As part of our work to decarbonise homes in the borough, we have also successfully secured, and will continue to apply for, new government grant funding to implement energy efficient measures into council-owned street properties, which are amongst the least energy efficient. A large proportion of the grant funding we apply for is also targeted at supporting the implementation of measures into privately owned homes for eligible households. However, we know that the extensive work that would be needed to truly tackle poor energy efficiency of our council homes, as well as those homes not under the control of this council, will take significant funding. After 10 years of cuts from this government, we can't do this alone. If this government is

serious about tackling the climate emergency, they need to urgently provide funds for councils to take the necessary action, including for the retrofitting of homes and buildings. I hope you will support our campaign Helena, thank you so much for your question.

**Question (3) from Andrew Willett to Cllr Champion, Executive Member for Environment & Transport:**

My impression from the early months of the People Friendly Streets is that they have made a massively positive difference to the numbers of people walking and cycling around Islington, while it also appears that traffic on some of the main roads, for example the Blackstock Road, is starting to 'normalise'. Could the Councillors please confirm if this is in line with what the data is telling them?

**Response:**

Thank you for your question. I'm delighted that you feel that the People Friendly Streets schemes have made a positive difference. My experience does accord with yours, but I also accept the fact we need objective data, which is why we've carried out the 6 months interim reports, the pre-consultation reports, and we will also do a consultation report.

These do show the changes in traffic volumes and speeds, as well as people cycling, and impacts on boundary roads and internal streets. I would like to emphasise traffic counts and monitoring reports are carried out by independent organisations. A few at the beginning were peer reviewed, but since then they have been carried out by independent companies.

The results are impressive; traffic levels have fallen significantly. For example, in Canonbury East, motorised traffic within the low traffic neighbourhood has reduced by 80 percent; in Highbury we've had increases in people cycling by about 66 percent. I know people remain concerned about what happens on main roads, and so are we, so we are monitoring that as well.

Overall, there hasn't been significant changes on main roads, in some cases they have gone up, in some cases they have gone down. We are monitoring them to make sure that in no road has something which is very significant, because we do need to make sure that we don't have a situation where, for example, traffic just displaces onto one street and causes real problems there.

Monitoring does suggest that traffic patterns settle over time, people change behaviour, and this is demonstrated in the evidence elsewhere. But we are absolutely looking at what we can do to make main roads less hostile. It's also maybe the case that there might be some changes to junctions that we can make to improve the situation.

Having said all that, yes it is important to have objective evidence, but people's views are also very important to us, which is why we are listening to your views, we are also listening to people who have different views, have mixed views, or in some cases have no views at all. That's why we will take all this into consideration before we

make a decision on whether to make a scheme permanent, to amend it, or to remove it.

**Question (4) from Lucy Facer to Cllr Champion, Executive Member for Environment & Transport:**

Islington Clean Air Parents would like to acknowledge the council's work and commitment to addressing air pollution in Islington, however children are still exposed to illegal levels of pollution in parts of the borough and air pollution monitoring shows all schools in Islington exceed the new World Health Organisation (WHO) targets. With evidence that there is no safe level of air pollution, will the council revise current air pollution targets in their policies to meet WHO 2021 air quality recommended targets?

**Response:**

Thank you for your question. I absolutely agree, we need to do all we can to reduce air pollution to the lowest possible level. As you know, we were working to meet the guidelines that were established in 2005. We've always said that no level of pollution is safe. It's an extremely important part of our commitment to make Islington cleaner, greener and healthier. We are working with the Mayor of London and neighbouring boroughs on this issue, with some real success.

Schemes such as ULEZ and People Friendly Streets which enable more people to walk, cycle and wheel have made a difference, and hopefully will continue to make a difference. We've also put in place our extensive School Streets programme, we're embarking on electrification the fleet, where we can't actually remove that vehicle, a highlight of which is our three fully electric refuse collection vehicles, with another due imminently.

Meeting the new World Health Organisation targets and interim guidance levels will be extremely hard. We are very much impacted by pollutants elsewhere, including from northern Europe. Even if we removed all sources of pollutants in Islington, we would still be unlikely to meet the new guidelines. However, the measures that we must take to tackle climate change, such as replacing gas boilers, as well as moving to more sustainable transport, and the roll-out of electric vehicles, will still make a significant difference.

There is a prospect of largely eliminating nitrogen dioxide in the medium to long term, depending of course on what policies are put in place by and support from this government. To answer your point though, there doesn't seem to be a clear path. We are working with researchers to see whether we can reach the required levels, but it will take time to look at that. We will need European countries to phase out coal and other fossil fuels, and solid fuels such as wood, and also fertiliser use in UK. They will also require shifts to active travel, not just in Islington but across London and across the country.

In short, there's a huge amount we can do, and we must do, in partnership with local residents and other organisations, but it will be a real challenge to get us the new WHO levels. The Council will update the air quality strategy and the action plan with

the aim of working towards the new guidelines, and we will certainly continue to work with the community to tackle this together, and I'm sure that Islington Clean Air Parents will be at the forefront of that.

**Question (5) from Caroline Royds to Cllr Champion, Executive Member for Environment & Transport:**

Does the Council agree with the Committee on Climate Change that “achieving significant emission reductions requires a step change, moving away from landfill and incineration and towards a reduction in waste arisings and reuse and recycling”?

**Response:**

Reducing waste, encouraging re-use and maximising recycling was a real priority before we declared a climate emergency in 2019, and it's now a very significant part of our net zero carbon strategy. This was discussed at an Environment and Regeneration Scrutiny Committee meeting last week, where officers attended to discuss not just reuse and recycling, but also the new Circular Economy Action Plan.

In Islington, reducing waste in the first place is so important. The 30 percent recycling rates seem very low; a high recycling rate is a really difficult thing to achieve in our densely populated borough with so many flats. So reducing waste in the first place is far easier. The generation of waste also has significant environmental impacts, even if it is recycled. We are working hard with residents, landlords, businesses and other partners, including the North London Waste Authority, to do what we can.

There are many initiatives throughout the year, including using Recycling Champions to share their expertise and reach out local people. I'd also like to mention one of our new initiatives, The Library of Things, which allows people to borrow items, rather than to buy.

We really need our government to step up; they must provide a framework which prevents waste and enables more recycling and reuse. We cannot do this without that support, but their action so far has been disappointing, to put it mildly.

**Questions 6, 7 and 8 received a joint response:**

**Question (6) from Jonathan Ward to Cllr Ward, Executive Member for Housing & Development:**

In relation to the proposals for the redevelopment of Holloway Prison, are you happy with the poor-quality living conditions of the proposed homes?

A significant number of homes, especially social housing, will require air conditioning to keep them comfortable. It is unacceptable that the number of apartments affected is not confirmed, neither are the additional running and maintenance costs for residents, nor the additional carbon emissions. An expert has estimated that hundreds of homes will require this air conditioning. This goes against Islington and GLA policy. The extreme density and height of the buildings site also means that over half of the living rooms will fail to meet the applicable targets for annual and

winter sunlight and that 208 of the rooms will fail to meet minimum daylight requirements. Are you happy with the proposed poor-quality living conditions for Islington residents, and the negative impacts on their lives?

**Question (7) from Richard Hope to Cllr Ward, Executive Member for Housing & Development:**

In relation to the proposed Holloway Prison development, why do the flats facing on to Camden Road and Parkhurst Road need mechanical ventilation?

**Question (8) from Robin Nicholson to Cllr Ward, Executive Member for Housing & Development:**

Given the overheating of so many new homes as a result of being single aspect without through ventilation, is the Council satisfied that the high proportion of flats without through ventilation is acceptable?

- There are no flats on the whole development which are 'through aspect' i.e. providing ventilation from front to back
- 484 flats or nearly half all flats are 'corner' aspect, i.e. with a front and side window and corner aspect flats will overheat if facing south and west
- 60 flats or 6% of all flats are single aspect – i.e. no through ventilation at all and subject to overheating, especially those on Parkhurst Road who will not want to open window because of the noise and pollution
- 441 flats, or nearly half are what they call 'stepped/double aspect' or what amounts to a bay window and to all intents and purposes single aspect and contrary to the London Plan.

The measurements of overheating given are limited and don't consider all flats. The social housing is particularly affected, which means they will need cooling systems, which will only add to tenants' costs.

**Response to questions 6, 7 and 8:**

Thank you for your questions. The Holloway Prison site development is a once-in-a-generation opportunity to build hundreds of brand new social homes in the heart of Islington. The borough is facing a housing crisis and in particular a dire shortage of genuinely affordable homes. Wherever possible, the Council wants to secure the greatest reasonable number of genuinely affordable homes on development sites that are not owned by the Council, however we also want to deliver the best possible quality and sustainable homes for future residents. This is a requirement of the council's planning policies.

The council is currently in the process of assessing and determining this planning application. I cannot therefore comment on the detail on the merits or otherwise of the application; this is a matter for planning officers and ultimately for the Planning Committee, if the recommendation is recommended for approval. However, I have passed your questions on to planning officers for consideration.

To answer a couple of issues raised in the questions; the new homes will receive fresh-air by mechanical ventilation systems, but it will not be air-conditioned. Planning officers, with the support of colleagues in Sustainability and in Environmental Health, are still completing their initial assessment of the application documents. Based on their early assessment, planning officers have identified areas where they conclude that the planning application documents may not be as clear as they should be in relation to the issue of potential overheating of some of the buildings. They are seeking further information from the applicants on this topic, as well as on wider sustainability issues.

In terms of Daylight and Sunlight in the homes, the application will be assessed against the relevant council and GLA planning policies and the BRE guidance. Thank you again for your questions.

**Question (9) from Anita Grant to Cllr Ward, Executive Member for Housing & Development:**

Are you happy about the poor quality of the Holloway Prison proposal for children? It lacks a child centred site wide response, with fragmented play areas, some are shaded and windy, some are behind gates in residents' only areas, and 0-4 year olds will be playing next to a 2-way road. It seems a shame when so much work has been done in Islington to put children first and when the need for excellent play is being recognised more and more, that this proposal for the prison site is being considered.

**Response:**

Thank you for your question. As I said in the previous answer, the Holloway Prison site development is a once-in-a-generation opportunity to build hundreds of brand new social rent homes right in the heart of Islington. The council is in the process of assessing and determining this planning application and I therefore cannot comment in detail on the merits or otherwise of the application. Consideration of this matter will be a matter for planning officers and ultimately the Planning Committee if the application is recommended for approval. However, I have passed your query onto planning officers for consideration.

Every child in the Borough deserves to grow up in a safe, secure and decent home. Not all of Islington's children have this advantage. Delivering decent, safe and genuinely affordable homes is the best way of ensuring that many more of Islington's children have the best possible start in life. The council has continued to protect and invest in playground facilities right across Islington to provide the best possible services for young people, but not just that, on every development site in the borough we want to deliver the best quality homes and facilities for future residents, including children and young people. The Holloway site is no different; we will continue to press Peabody to explain and demonstrate how they will deliver a child centred site through their planning application. Thank you again for your question.

**Questions 10, 11 and 12 received a joint response:**

**Question (10) from Nick Clarke to Cllr Champion, Executive Member for Environment & Transport:**

The North London Waste Authority will decide on 16 December whether to build the Edmonton Incinerator. To put this project in context the entire county of Chad emits about 900,000 tonnes of CO<sub>2</sub> per annum - not much more than the 700,000 tonnes annual emissions from this proposed incinerator. Lake Chad has shrunk to 1/10th its size due to climate change, affecting 30 million people who rely on its water. In the words of environmentalist Hindou Ibrahim from Chad: "Climate change is real and its not about our future it is about our present... we need solutions, we don't have time. It's now the time for action and immediate action for those people who are getting impacted who didn't create this climate thing."

On 9 July 2020 the Council passed a motion regarding Atonement and Reparations for the United Kingdom's Transatlantic Traffic in Enslaved Africans acknowledging: "a great deal of the wealth of the United Kingdom was founded on this vile crime against humanity, and the legacies of chattel, colonial and neocolonial forms of enslavement are still prevalent in our society today".

Does the Council not recognise that postponing our move to a circular economy by 25 years because we do not have the will and imagination to see beyond our waste fuelled culture and economy is a perpetuation of this crime against humanity?

**Question (11) from Kate Pothalingam to Cllr Champion, Executive Member for Environment & Transport:**

The Labour Mayor of London, Sadiq Khan, is on the record saying "London is facing a climate emergency and I will continue to oppose new incineration capacity in London, which is not needed to manage the city's non-recyclable waste." Why does Islington Labour not agree?

**Question (12) from Ben Griffith to Cllr Champion, Executive Member for Environment & Transport:**

On 16 December, Councillors Champion and Gill, as the Council's representatives to the North London Waste Authority, will be voting on whether to award a contract as part of the plan to incur £1.2bn of council tax payer debt to build a new bigger waste incinerator and other facilities at Edmonton. They will be encouraged to vote in favour of the Edmonton Incinerator because it is claimed there is no better alternative; and yet we know this decade is crucial to reduce our CO<sub>2</sub> emissions - the council has set 2030 as a deadline for net zero.

Instead of the incinerator, we can sort our waste into its constituent parts. We can educate, support and incentivise the general public to do this. We can pressure companies to reduce waste. We can invest in mixed waste sorting technology. In this view I find myself supported by the Chief Scientific Advisor to DEFRA who states 'incineration is not a good direction to go in'

The NLWA commissioned Ramboll to compare the carbon impact of incineration to landfill. But would Councillors Gill and Champion please describe what circular economy alternatives to incineration have been considered by the NLWA? Please detail any specific feasibility studies that have been commissioned by the NLWA describing circular economy alternatives to incineration?

**Response to questions 10, 11 and 12:**

Thank you for your questions. I understand that this is a difficult topic, and I do understand the position of the people who don't believe that this is the right solution, but I'm also asking them to perhaps reflect on the reasons why we think it is.

We do know that climate change impacts on poorer countries and on poorer communities; there is absolutely a need for richer countries to tackle emissions, but also to support developing countries with both money and technology. We also know it's an existential threat to all of us, and COP26 frankly was not particularly encouraging in that regard. Local authorities like Islington are doing a lot, but unfortunately much of this is outside of our control. It's not a lack of will, it's not a lack of imagination.

I agree with Ben, we must do what we can, and we will do what we can, we are doing a lot, but his language is illustrative. He talked about the need to educate, support and incentivise, and frankly that is our problem. We can't make people generate less waste. We can't make people recycle more. We can persuade, we can try, but it's incredibly difficult, and as I said earlier, it's particularly difficult in a borough like Islington, with such densely populated properties and flats.

Our power has actually been reduced by the government. What we need is for them to provide the framework to prevent waste, enable reuse, and recycle. If the government don't do that then frankly we don't get very far. We also need this government to fund local authorities, so we can go out and talk to people. We can put facilities in place that will encourage people to do to change their behaviour, and we can work with businesses and residents, but this is a government that didn't even mention climate change once in their budget, so frankly I'm not that optimistic.

The Mayor's London Environment Strategy states in London will have sufficient residual waste capacity once Edmonton is developed. No one wants to incinerate waste. But this is our choice unfortunately: do we dispose of our waste through a publicly controlled facility, run by a wholly-owned company of North London Waste Authority, which comprises elected representatives who have specified the highest environmental standards and have the determination to adopt new technology, including carbon capture, as soon as it becomes available; or do we effectively wash our hands responsibility for the waste disposal by sending it to privately run companies, motivated by profit? Their duty is not to the residents, and we would have no control over their standards or the costs.

We are held to a higher standard because we're here to serve the public. We know we will listen, and will do the very best we can. What is important is we hold ourselves to a higher standard. That is why I trust North London Waste Authority, and my

council colleagues, to deal with our waste not now, but in coming years as well, over companies who make a business of it.

**Question (13) from Bridget Fox to Cllr Ward, Executive Member for Housing & Development:**

Islington Council claims to support recycling, yet communal recycling bins and waste areas on our estates are regularly left overflowing. What measures is the Council taking to clean up its act?

**Response:**

Thank you very much for your question. Islington Council is determined to tackle the climate crisis. An important part of that is effective and sustainable waste and recycling. Our recycling process covers the widest range of materials in the country. Many residents have the maximum opportunity to recycle. We also provide public reuse and recycling centres for items that cannot be recycled in household collection.

We are focused on increasing the number of recycling facilities across our borough to make it easier and better for local people to recycle, as well as to prevent fly-tipping. Estate staff work closely with enforcement teams to tackle fly-tipping, identifying hotspots, sharing intelligence, using CCTV to assist in, and identifying those who dispose of refuse incorrectly. Areas are regularly inspected by our estates staff and we will continue to review both bin capacity and collection frequencies to prevent overflowing bins on our estates. If residents have concerns with any specific areas on their estates please contact our Estate Services team and please feel free to contact me as well. Thank you very much for your question.

**Question (14) from Filip Rambousek to Cllr Ward, Executive Member for Housing & Development:**

With so many families in overcrowded or unsafe council accommodation, what is the average void time to turn around council homes between tenancies, and why is it taking so long to make these much-needed homes available?

**Response:**

Thank you very much for your question. The council is focused on providing safe and decent genuinely affordable homes for local people. There is a housing crisis in our borough caused by this government, with too many people living in unsuitable homes. A key part of tackling the housing crisis is to make the most of our current housing stock, and we've got to do that as efficiently as possible.

The average void turnaround time for a routine void is 26.5 days for 2021-22 so far. The council remains focused on reducing the time it takes for a property to be refurbished and made ready for new tenants, balancing speed of turnaround time with the need to make homes fit and welcoming for new tenants, so we'll continue to try and get better at this. There is nothing better in my job than going to see residents and families whose life has been transformed because they've moved into a council

home. I hope that I can visit many more residents in that situation, so we will continue to work on reducing our void times, and indeed on building as many council homes as possible. Thank you again for your question.

**Question (15) from Melissa Herman to Cllr Ward, Executive Member for Housing & Development:**

In relation to the proposals for the redevelopment of Holloway Prison, the SPD is referenced in the emerging plan site allocations document as a document that 'will be given significant weight in terms of future determinations' and states the following:

5.44 In reflection of the council's commitment to community cohesion and the value and vitality associated with diverse communities, the residential elements of a future scheme should be based on a layout which maximises tenure integration, with affordable and private housing built to the same standards and indistinguishable from one another in terms of design quality, appearance and location on site. There should be no separation of amenity or facilities according to tenure.

In Peabody's plans for Holloway, many of the homes for social rent will be on the main road in the tallest block planned for the site and there is no pepper potting or tenure mixing with the blocks. How will the council ensure tenure integration and equality of standards (e.g. space, aspect, materials used) between tenures on the Holloway development?

**Response:**

Thank you for your question. As you will have heard already this evening, I am passionate about making sure the Holloway Prison site delivers on its potential to be a generational opportunity to properly tackle the housing crisis in our borough. Let's make no mistake, this government thinks of our borough as a cash cow; that's why they sold Holloway Prison for the maximum possible receipt, so they could use that money to build super prisons away from away from our borough, and take those proceeds out of our borough. The government thinks of this borough as a cash cow, and we won't take that.

As I've said earlier this evening, the council is in the process of assessing and determining this planning application, and I cannot therefore comment in detail on the merits or otherwise of the application. Consideration of this matter will be a matter for planning officers and ultimately the Planning Committee if the application is recommended for approval. However, I have passed on your query to planning officers for consideration.

The Council's planning policies in respect of residential amenity apply equally to all housing tenures and all housing tenures are expected to meet the same standards. We are very strict about that. We also want to make sure that all new developments, including this one, are tenure blind. That is why we work so hard on our planning policies. This principle is set out very clearly and very strongly in the Council's planning policies. These policies require that private and genuinely affordable homes

are built to the same standard and offer the same visual appearance and quality of living accommodation and amenity to their occupants.

I was proud this morning to visit Charles Simmons House in Clerkenwell ward, which has just been completed. This was going to be a half-private development, but as a result of funding from the Mayor of London, it is now 100% council housing scheme, and this is something to be proud of. Thank you again for your question.

**Question (16) from David Lincoln to Cllr Champion, Executive Member for Environment & Transport:**

Advancing the health and wellbeing of residents is an important role of Islington council. There is strong scientific evidence that incorporating physical activity into their daily routine helps people live healthier and happier lives.

Does the Council agree that extending the roll out of People Friendly Streets will enable more people to choose to walk or cycle more often which will have a significant positive impact toward improving public health, perhaps greater than any other intervention available to the council?

**Response:**

Thank you. I absolutely agree with you that increasing physical activity greatly helps improve people's health and wellbeing. Increasing walking and cycling is one of the key aims of Islington's Transport Strategy. This is aligned with the Mayor of London's Transport Strategy, and sets a goal for all Londoners to have 20 minutes of physical activity each day by 2041.

We know that building opportunities for people to do this activity as part of their daily routine, such as walking to work or cycling to school, is the most effective way of making sure it happens; and we know this has a real benefit to both mental and physical wellbeing of residents.

Our People Friendly Streets programme aims to allow people to walk and cycle; but also, just to be. I think that is our next challenge: how we change our streets, in the face of the climate emergency, to make resilient inter-community spaces which are nicer to be in, not just nicer to travel through. Children can then play, people could sit and chat, or people can choose to go for walks or cycle through them.

Reducing traffic on neighbouring streets is really important, and we know it's really important to the more vulnerable residents as well. If you want to get people to cycle, if you want to get children to cycle, if you want to get mothers to take children to school by bike, or to take their children to play dates by scooting, you have to reduce traffic to a really low level. I know that some people think cycling among traffic is fine; but for many of us, including myself, high traffic levels are a barrier to cycling. I agree we have to continue to do what we can, but also to recognise the work of other boroughs, so together across London we can build a network of connected, safe and attractive spaces. Thank you for your question.

The Mayor announced that the 30 minutes permitted for questions from members of the public had expired and all remaining questions would receive a written response.

**Question (17) from Rebekah Kelly to Cllr Champion, Executive Member for Environment & Transport:**

People are eager to know about the final decision for St. Peter's People Friendly Streets scheme as the ETO expires and the council must now decide whether the scheme becomes permanent, is removed or adjusted, and what adjustments may take place.

As it is not on the agenda for this council meeting, how and when will that decision be announced? Please provide a specific date.

**Response:**

The consultation for St Peter's closed on 11 October 2021. Since that date, the council has been carefully analysing all the feedback provided during the public consultation and other engagement activities. This is an important aspect of our people-friendly streets programme as it allows local people to best chance to have their say and tell us what they think about the people-friendly streets neighbourhoods.

As the 18-month experimental traffic order for the St Peter's LTN expires on 3 January 2022, the council will be making an announcement before that date, regarding the future of the St Peter's scheme. The decision will be announced via press release, website changes, leaflets to local residents and on social media. The consultation report and decision report will be published online.

**Question (18) from Pierre Delarue to Cllr Champion, Executive Member for Environment & Transport:**

What is the average time taken to repair a streetlight once reported, and what percentage of street lights were fixed within one week?

**Response:**

Streetlights are a key part of keeping people in our borough safe and we are determined to ensure that once a fault is reported, it is dealt with as soon as possible. The average time taken to repair a streetlight once reported last year was 3.5 days and the percentage of street lights fixed within one week is 99.5%.

**Question (19) from Ernestas Jegorovas-Armstrong to Cllr Champion, Executive Member for Environment & Transport:**

How many residents engaged in Let's talk about a greener future two week festival? What is the council going to do to make sure more residents get involved in Islington Together festival in 2022?

**Response:**

Thank you for your question. Our recent climate festival, Islington Together: Let's Talk about a Greener future, was a wonderful opportunity to listen to local people and discuss how we can all work together to tackle the climate crisis, following the publication of Vision 2030, our roadmap to becoming a net zero carbon borough by 2030.

We are now in the process of looking at what we heard and learned from local people and the organisers of over 100 festival events to support our work in implementing the Vision 2030 strategy. We were pleased with the overall level of engagement across many of the festival events, with momentum behind the events increased as the fortnight progressed. We will use what we have learned from the festival to decide we can tackle these issues alongside local people in future, including continuing to look at innovative ways we can achieve the greatest reduction in Islington carbon emissions.

**Question (20) from Devon Osborne to Cllr Ward, Executive Member for Housing & Development:**

Does the council know how many estate intercoms are currently in need of repair and how many residents this effects? Does the council have a timetable for repair of intercoms on estates and a procedure with timings and deadlines that is followed after the first complaint? Does the council acknowledge the necessity of working intercoms for residents safety? And what is the council's plan to address anti-social behaviour in stairwells and supposedly secure common areas?

**Response:**

Thank you for your question. Everyone has the right to feel safe and secure in their home without having to worry about intruders or anti-social behaviour in communal areas and stairwells.

Recognising the importance of this, the council is carrying out a comprehensive upgrade to the IT of its intercom and linked fob systems on the 642 sites across the borough that operate with this system. The council has commissioned a programme of upgrade works to the intercom equipment at the affected sites to connect each of them to a more modern and robust door entry access control IT system. This work programme began in November 2021 and we expect this upgrade work to take six months to complete.

Our council is determined to tackle ASB wherever it takes place, including in communal areas. We encourage anyone experiencing anti-social behaviour to report it to the council so that we can take action. When these problems arise, we use a number of forms of action against those taking part in anti-social behaviour to deter perpetrators.

We also look at the physical environment to see where we can make improvements that can make anti-social behaviour in blocks less likely. This can include would

ensuring broken intercoms are fixed, as well as considering if temporary CCTV is needed, improving lines of sight around e.g. hedges and planted areas, ensuring bin areas are safe and secure and making sure that doors are not being propped open, to make our borough and local people's homes as safe as possible.

**Question (21) from Chuck Y to Cllr Champion, Executive Member for Environment & Transport:**

On Chadwell Street there is an island between the bike and car lane. This island has become a regular dumping ground for both household, commercial and building waste. This includes furniture and huge cardboard boxes among the other waste.

Given this happens on a daily basis, it was quite surprised when I was told by the Islington Waste Team that they would not be able to take any real actions to stop the fly tipping; I was told all they could do is send someone to clear the trash, which is unlikely to even be done given the number of items of litter regularly there.

My question to the council is what active steps are the council taking to prevent fly tipping? It seems at the moment that the lack of surveillance, the lack of a note or sign, and the response of the team when I called Islington Council, indicate that the Council are taking no steps to prevent fly tipping and simply addressing the after effects by cleaning up after these criminals.

Given the frequency and scale of fly tipping, is this not arguably easier to tackle than a one off occurrence of fly-tipping? If the council won't even bother with an easier case of trying to stop fly-tipping, is the council simply not trying to address fly-tipping at all?

**Response:**

We are determined to make Islington cleaner, greener and healthier and that is why the Council takes fly-tipping very seriously. Our dedicated officers proactively clear fly-tips with a 93% clearance rate, within 24 hours of fly tip being reported. The Council's Cleansing Operational team regularly pass on fly-tipping intelligence to our Council Compliance team who use this information along with other intelligence received such as your enquiry relating to Chadwell Street to undertake enforcement action to prevent and reduce fly-tipping within the borough.

Our Council Compliance team put up no dumping enforcement signage and are undertaking regular monitoring patrols in Chadwell Street to catch and enforce upon the small minority of people that refuse to do the right thing and dispose of their waste correctly. I will contact you after this meeting to pass on the details of the Council Officer who would be best placed to manage your query.

**Question (22) from Guilene Marco to Cllr Ngongo, Executive Member for Children, Young People & Families:**

Most of the equipment in the playground in Arundel Square has been removed following a safety inspection in May. Residents, parents and children have been waiting for 6 months now for a reopening of their favourite playground. Will you be

able to let us know when the Council will secure a supplier and a budget to fix the equipment in Arundel Square? Do you have a timeline for the works, and can you guarantee a reopening before May 2022?

**Response:**

Thank you for your question Guilene. Ensuring the health and safety of local people is a top priority for the Council, in particular ensuring facilities for our young people are in the best possible condition. Due to immediate safety concerns around some of the equipment in Arundel Square playground, we took the difficult decision to secure the whole playground to ensure the safety of the children that use it. Unfortunately the timber supports for the main bridge structure and swings was found to be rotten. We then carried out remedial work to allow some items to remain accessible.

We know that the playground is a much loved resource, and we understand the disappointment that this closure will have caused to children and families. The council has been working hard to source a supplier for these works but, unfortunately, a huge surge in demand and major supply issues, including Brexit and Covid related problems, within the play industry have meant this hasn't yet been possible. We cannot unfortunately therefore provide a timeline or any guarantees of when the work will be completed by. The council will continue to work hard to find a supplier for these works, despite the current difficulties. Once a supplier has been found, we will ensure the playground is repaired and restored for local people to enjoy as quickly as possible.

**Question (23) from Dominic Martin to Cllr Lukes, Executive Member for Community Safety:**

What are the 2021 figures for bicycle theft in Islington, and how do they compare with other London boroughs? What percentage of reported bicycle thefts result in successful prosecution; and what is the Council doing to reduce levels of bicycle theft in Islington?

**Response:**

Encouraging cycling is a key part of the Council's strategy to make our borough a cleaner, greener, healthier place for all. Part of that work is ensuring local people who cycle can rely on the safety of their bike.

During the past 12 months, 1,148 bikes were stolen in Islington, which is a 16% reduction from the previous 12 months. In comparison, across London, there has been a 6% reduction. Despite this, we know every bike theft is difficult for those concerned and we are working with the Police, partners and the local community to further tackle the problem.

This work has included, organising 12 Bike Safety events across the borough, marking and registering over 400 bikes using Bike Register etching kits and crime preventative stickers and 'Hot Spot' analysis shared with police, to inform where and when they patrol to tackle this crime type. Unfortunately we do not hold data around prosecutions.

Of course the best way to prevent bike theft is secure storage, and we are working hard on that. We have 181 units on our estates with capacity for 1889 bikes. We have 240 street bike hangars with 1440 spaces. And there will be more! This year we plan 160 more hangars with 960 spaces, and next year 100 more with 600 spaces. If you want one near you, please do get in touch.

**Question (24) to Cllr Champion, Executive Member for Environment & Transport:**

Does the Council feel confident it will meet the Net Zero 2030 plan and how much does it anticipate having to offset to be net zero by 2030?

**Response:**

I am proud that Islington's Labour-run Council is at the forefront of tackling the climate emergency. We were one of the first councils in the country to declare an emergency, in July 2019 and since then, we have been focused on achieving our ambitious goal of a net zero carbon borough since 2030.

Carbon emissions in the borough fell by 45% between 2005 and 2019 (the most recent reporting year), well ahead of the borough's target of 40% by 2020, and during a period in which our population increased almost a third. Per capita carbon emissions in Islington fell by 58% in the same time period – the 11th largest reduction in the country.

The Vision 2030 strategy is ambitious and far-reaching, and will involve testing or trialling interventions or ways of working that are innovative and radical. However, Islington Council is only directly responsible for around 4% of the borough's emissions, with around another 5% coming from boilers in homes of council tenants. That is why it is so important for us to tackle this issue together, as a borough.

Becoming a net zero borough will need each and every one of us to take action – residents, businesses, public bodies and the third sector. We are committed to leading the way in supporting local people, businesses and other partners to reduce their impact. However, reaching these goals is made much harder by Tory austerity and the Central Government cuts which have forced the Council to make £250 million in budget savings since 2010.

We do not currently have a figure for the level of carbon offsetting that will be required to be net zero in 2030, as this will be dependent on a range of factors, including how quickly the electricity grid decarbonises and the level of support provided by central government to deliver net zero action. We will be monitoring our progress against the strategy on an ongoing basis, reporting annually this will inform our work to develop an offsetting strategy to help us address any residual emissions.

**Question (25) from John Hartley to Cllr Champion, Executive Member for Environment & Transport:**

Following COP26, everyone must now agree that we are in a climate emergency, and we all must reduce our emissions urgently. Islington has also committed to Vision Zero for London - to eliminate all deaths and serious injuries from our roads. Air pollution in London is killing 4,000 people every year. Tackling global heating, road deaths, toxic air - three essential, unarguable, goals. Discouraging the use of private vehicles by rolling out People Friendly Streets across the Borough will go a long way to achieving all three aims.

Is the Council aware of any alternative which is likely to be as effective in meeting these three critical goals?

**Response:**

I agree the three goals you set out are incredibly important, and I am proud that Islington's Labour-run Council is addressing all three through our successful people-friendly streets programme. There is a growing evidence base for the effectiveness and positive impacts of low-traffic and liveable neighbourhoods, which aligns with the evidence from the monitoring of our own schemes (which can be found on the Council's website).

Our people-friendly streets programme is being rolled out across the borough to make Islington cleaner, greener and healthier, as well as making our roads safer for people walking, cycling and wheeling.

Our reports show that traffic levels within the people-friendly streets neighbourhoods has fallen significantly as well as decreases in the number of vehicles speeding and vast increases in the number of people cycling. However, it is important we get local people's feedback. We are keen to hear views on all of the people-friendly streets neighbourhoods in the formal consultation period and would encourage everyone who lives near or uses the schemes to have your say.

**Question (26) to Cllr Turan, Executive Member for Health & Care:**

NDP (Neuro Development Pathway) wait times are on the Whittington Trust's risk register. As the parent of a severely distressed child, whose 15 month wait for a Neurodevelopmental Pathway Assessment had already exceeded the 52 week wait time given, I was recently told that the wait time has now been extended to 32 months. Can you satisfy me there is a robust recovery plan in place rather than one that is creating systematic churn?

**Response:**

I would like to start by apologising for the situation you have experienced looking to get support for your child. The current position of waiting times for ASD assessment in Islington, and indeed across the whole of North Central London, is a high priority for the Council and all our partners in the sector. I'm all too aware that the current

position is unacceptable and we are committed to working in partnership to address the challenges and develop a model for children and young people that reduces delay.

Senior leaders in Whittington Health and within North Central London (NCL) Clinical Commissioning Group, are actively engaged in working to ensure a clear plan, delivered within agreed timescales, to reduce the waiting times to 18 weeks and clear current backlogs across North Central London by March 2023. The plan includes the provision of additional funding for the Islington Neuro Developmental Pathway, with an additional funded programme in place to reduce backlogs.

Islington Council has also worked with Whittington Health to put in place a programme of therapeutic and family support for young people which can be accessed while they are on the waiting list. Parents are advised to visit the Islington CAMHS pages on the Whittington Health website to find out more about services available. Thank you again for your question and I will keep in contact with NHS colleagues and partners to ensure the measures I have mentioned take place.

**Question (27) from Roderik Gonggrijp to Cllr Ward, Executive Member for Housing & Development:**

The proposed Holloway Prison development is for 985 housing units to accommodate 3,450 new residents. Based on data from the Mayor's Office, this will give St George's ward the 12th highest population density of all 624 wards in London. Yet, no new amenities or even a community centre are planned, nor does the 300 document planning application appear to contain any tested impact assessment for the existing amenities in the area that the new residents are expected to use.

What assessment has been made to ensure that there are adequate health, education and sport facilities, along with green space to support the residents moving in to the new homes?

**Response:**

Thank you for your question. The council is currently in the process of assessing and determining this planning application, and I cannot therefore comment in detail on the merits or otherwise of the application. Consideration of this matter will be a matter for planning officers and ultimately the Planning Committee if the application is recommended for approval. However, I have passed your query onto planning officers for consideration.

Councillors have always made it very clear to Peabody that they are not just building a new neighbourhood, they are building a new community. The provision of a new public park and a Women's Building within the proposed scheme is therefore welcome.

However, our planning policies require that the built form of the development support community cohesion and integration. We also expect the development to be welcoming to the wider community and for the residents of this new neighbourhood to

feel part of the wider Islington community. These considerations will all be part of the final recommendation of planning officers and then the decision of the Planning Committee.

**Question (28) from Linda Clarke to Cllr Ward, Executive Member for Housing & Development:**

The proposed environmental design for the redevelopment of Holloway prison, intended as a net zero energy building development, falls far short of the London Borough of Islington Net Zero Carbon targets:

- The heating demand is 72-162% more than the Islington target;
- The building airtightness mean the buildings will be 5 times more leaky than the Islington target;
- The upfront embodied carbon emissions are 650kg/CO<sub>2</sub>/m<sup>2</sup>, more than double the 300kg/CO<sub>2</sub>/m<sup>2</sup> target for 2030;
- Not a single item from the site is proposed to be reclaimed for re-use;
- The renewable energy generation is only 62% of the Islington Council target;

In the light of the Climate Emergency, the Council's 2030 Net Zero carbon targets and recognising that the project will be completed close to 2030, surely the proposals for the site cannot be accepted by the Council given that they are at odds with its own environmental policies?

**Response:**

Thank you for your question Linda. The council is currently in the process of assessing and determining this planning application, and I cannot therefore comment in detail on the merits or otherwise of the application. Consideration of this matter will be a matter for planning officers and ultimately the Planning Committee if the application is recommended for approval. However, I have passed your query onto planning officers for consideration.

On this and every other development site we want to deliver sustainable development in line with the council's Net Zero Carbon commitment and the council and GLA planning policies. The council's planning policies require all major developments in the borough to be net zero carbon but allow for carbon offsetting payments if the development cannot meet the net zero carbon requirements on site.

Peabody's planning application includes an Energy Strategy and the initial plans include proposals for air or ground source heat pumps to provide energy for the site. Planning officers are still in their initial stages of their assessment of the application and are taking advice from internal and external technical experts, to continue to push for improvements to the Energy Strategy in line with the relevant planning policies and the council's Net Zero Carbon commitment.

**Question (29) from Jill Ellenby to Cllr Champion, Executive Member for Environment & Transport:**

What would be the financial implications for Islington Council if the new north London incinerator operates at respectively 80 per cent, 60 per cent and 40 per cent of capacity, given the impact on its cost-effectiveness as well as the income from burning waste and from supplying heat and electricity?

**Response:**

The Energy for Waste facility at Edmonton Eco Park is an important part of the work done by Islington and our surrounding boroughs to manage waste and recycling in North London.

The Council doesn't hold the detailed financial analysis for Islington referred to in the question. North London Waste Authority have, on the request of the constituent boroughs, estimated that the construction of a facility with a 30% smaller capacity would reduce the cost of the project by 8% initially. However, NLWA have advised that this would need have to be re-tendered and with the current inflation of the parts needed running at 12%, this would eventually lead to the facility costing more for a lower capacity plant.

The overall cost of the project will be paid for through the waste disposal levy and by each of the constituent boroughs once the facility has been built. This is one of several elements that make up Islington's and the other borough's waste levy including the tonnage of residual waste and recycle collected, day to day operating costs (e.g. the cost of running North London's reuse and recycling centres, haulage cost disposal fees, waste prevention and reuse work etc), any third party income e.g. from commercial waste.

**Questions 30 and 31 received a joint response:**

**Question (30) from Claire Zammit to Cllr Ward, Executive Member for Housing & Development:**

The Holloway Prison Site is a generational opportunity to tackle the housing crisis in our borough and build hundreds of new good quality social homes on the border of Holloway ward.

We know the site has a strong legacy as it was the largest women's prison in Europe before it was closed, providing extensive services to and for the wider community. Can you tell me what the Council is doing to ensure that, if the plans are approved, the legacy of supporting women will continue and what type of services you believe the Women's Building will provide for the greater community? Also will the Women's Building be women-only and how will you ensure it will be financially sustainable?

**Question (31) from Niki Gibbs to Cllr Ward, Executive Member for Housing & Development:**

HMP Holloway is a site of huge historical national importance to the struggle for women's rights, and part of Islington's built heritage.

When the planning department was preparing its Design Brief for the Women's Building, 24 of 28 expert individuals and organisations said they did not support the draft plans for the HWB. The useable room space offered is approximately 920sqm within the 1500sqm floor plan; the remainder is corridors and WC facilities. Yet even the draft brief recommends approx.. 1,200sqm.

Peabody's plan is effectively disrespecting half the population with a tokenistic offer of a Women's Building on a unique legacy site for women. Is the Council willing for this important history to be erased, and its legacy reduced to a single floor under a tower block, when no feasibility study or needs assessment has been done to quantify the space, services, service delivery, viability or governance, meeting the needs of women as laid out in the SPD?

**Response to questions 30 and 31:**

The council is currently in the process of assessing and determining this planning application, and I cannot therefore comment in detail on the merits or otherwise of the application. Consideration of this matter will be a matter for planning officers and ultimately the Planning Committee if the application is recommended for approval.

However, I have passed your query onto planning officers for consideration. We are clear that the Holloway Prison Site has a significant legacy for women in Islington and beyond as the former largest women's prison in Europe. Since the publication of the Supplementary Planning Document in January 2018, the council has been clear about its priorities for this site. The council expects the site to deliver the maximum reasonable amount of genuinely affordable homes, a new public park and of course a Women's Building.

Over time, the planned building has increased in size from 800sqm to the current 1489sqm. This will be the largest community facility in the borough and the building is larger than the other women's centres that planning officers consulted and considered during the development of the brief. This increase in space was in direct response to the consultation feedback and the ongoing research undertaken by planning officers. The need to accommodate, within one building, two functions – the less public and more safe women's centre facilities and the more open and public facing women's building activities and functions, was agreed early in the consultation process.

At this point in time, I cannot provide a detailed response to your questions about the commissioning and funding of services within the building or even who can access the building. Indeed it would not be appropriate for me to do so because further work is needed to investigate these important matters.

The council is working with Peabody to commission a study from an organisation that is an expert on these matters. This will identify the arrangements for commissioning an organisation to run the Women's Building and the potential arrangements for delivering and funding services within the building.

Through the study, we will continue to engage openly and positively with grass roots women's organisations, potential service users and providers, and organisations that deliver similar services to women including those organisations that currently run and manage similar buildings. This will allow us to further identify best practice in these areas and identify the most effective arrangements for commissioning, funding and delivering services within the building.

A draft brief for this study has been sent to Community Plan for Holloway, and I do hope that it will commit to joining us in commissioning this study, to ensure the site, and women's building, serves the community, and Islington women in particular, in the best possible way.

**Question (32) from Debbie Humphry to Cllr Ward, Executive Member for Housing & Development:**

Are you happy that there are no London Living Rent homes (suitable for low income households such as key workers who will not be able to access social rent housing) but that all 18% of Intermediate housing is shared ownership with minimum required household incomes of over £65K for a 25% share of a 2-bed Peabody property in Islington?

**Response:**

Thank you for your question Debbie.

The council is currently in the process of assessing and determining this planning application, and I cannot therefore comment in detail on the merits or otherwise of the application. Consideration of this matter will be a matter for planning officers and ultimately the Planning Committee if the application is recommended for approval. However, I have passed your query onto planning officers for consideration. I am of course pleased that if the current application is approved, it will deliver 60% affordable housing including 42% for social rent. Securing homes for social rent is the council's main priority.

I do however share your concerns about the affordability of the shared ownership tenure. Peabody has told us that the charges for this tenure will be compliant with the GLA's policies on shared ownership and I have pressed for further details of how this will work in practice on this site. I have also constantly pressed Peabody to consider the inclusion of London Living Rent homes on this site if it can be demonstrated that it is financially viable to do so and this will not impact the delivery of homes for social rent. This is something which planning officers will be working with Peabody on, while considering the application as a whole.

**170 QUESTIONS FROM MEMBERS OF THE COUNCIL**

**Question (1) from Cllr Poyser to Cllr Gill, Executive Member for Finance & Performance:**

The Boxing Club in Elthorne Park was temporary many years ago and is now dilapidated. As I have said many times before in full Council, organised boxing has been shown to be a proactive solution to all sorts of youth issues where the Council has been active. The Club is particularly supportive of women boxers.

The Boxing Club are doing excellent work trying to renew their premises – following the ‘Queensberry Rules’. It would be knock-out if Council help kick-start Round One of this project

Could you outline the support the Council has given the rebuilding?

**Response:**

Thank you for your question. The Council is focused on improving facilities for local people to take part in exercise and sport, as well as supporting local community organisations. The Boxing Club has plans to replace its current building with a new extended club building. This will enable the Boxing Club to provide better facilities for its members. So far the Council has contributed £34,500 to support the club in developing these plans; this funding has mainly come from the Hillrise ward councillors, but St Mary's and Junction ward councillors have also contributed from their local funds. Senior Planning officers have also met with the Boxing Club on a couple of occasions and provided the club with some extensive pre-application advice. We understand the planning application for the new building will be submitted shortly and I wish them all the best in their future fundraising efforts.

**Question (2) from Cllr Poole to Cllr Ngongo, Executive Member for Children, Young People & Families:**

As Her Majesty The Queen prepares to pass an historic milestone and celebrate her Platinum Jubilee next year, will the Executive Member for Children, Young People & Families tell the Council what plans are being formulated for Islington Schools to celebrate this great event?

**Response:**

Thank you for your question. The Platinum Jubilee next year is a wonderful landmark for our borough and the country. This Council is planning to work with our schools to make sure our children get fully involved, because it is a good opportunity for them to learn about the history of our country and the reign of our Queen. The government has announced that all schoolchildren are going to receive a free book, which will allow them to learn more about the monarchy and to understand in details the meaning of the jubilee. That is why we are putting resources in place for our young people to get involved. We know this is going to be a good and remarkable Jubilee

next year; and we are going to make sure our children and young people learn about and celebrate the jubilee. Thank you.

**Supplementary:**

Thank you for that very encouraging answer. One thing that could be done is to secure and save the Royal Northern War Memorial as a fitting tribute to our Majesty.

**Response:**

Thank you. We will be celebrating our achievements.

**Question (3) from Cllr Ismail to Cllr Turan, Executive Member for Health & Social Care:**

Before coronavirus disease, black women over 50 suffered loneliness, isolation, depression, and language barriers. Now, with the current Omicron looming, what support is in place to combat further loneliness and isolation for Black women?

**As Cllr Turan was not able to attend the meeting the question was answered by Cllr Comer-Schwartz, Leader of the Council:**

Thank you for your question. We are very much aware that of the health inequalities that affect this Borough and our society, especially the inequalities in mental health and how that this has widened during the pandemic.

Women, especially those from Black, Asian and Minority Ethnic communities, are one of the groups that have been most deeply affected by this.

We know that loneliness increased due to the pandemic and the changes brought about because of it. This has led to increased isolation, depression and anxiety. The Council is working with our partners and our local community to tackle these issues head on.

The health and wellbeing services within the Borough quickly moved to a remote approach to ensure that they were able to continue to support local people while keeping within the Covid regulations. This has meant that services were able to continue both within buildings, but also through a range of remote options, including telephone.

We have offered digital training and equipment to support residents with accessing these services. Community services continue to operate on a flexible basis, both face to face and virtually, to support residents in a way they prefer.

There are a number of organisations in Islington that engage with local people on health concerns. Where the Council and the NHS cannot reach them and we recognise the value of the voluntary sector in this regard. Working collaboratively with these organisations is vital to ensure that we support as many people as possible. This is why we work with Manor Gardens, an organisation that helps people whose

first language isn't English, providing access for social workers and other professionals, as well as finding support through other residents and improving access to community groups.

Islington Mind is also a large mental health provider within the Borough and a reputable voluntary community sector organisation. It provides a range of practical and emotional support to over 850 residents in 2020/21, We know that in 2019, 18% those people attending Mind services described themselves as either Black African, Black Caribbean or Black British. In Quarter 1 of 2021, this has increased to 21%. However, while the Council and the NHS continue to seek to offer support to as many people as possible, this becomes much harder while continuing to be held back by government austerity. Mental health services continue to be under-funded, which has been an issue for the last decade. This Council continues to try and fill the gaps, although we have had to make £250million in budget savings since 2010. We can only tackle these deep-rooted issues by working together and by central government properly funding mental health services.

**Supplementary question:**

Thank you. Neighbouring boroughs such as Camden, Hackney and Tower Hamlets run culturally sensitive luncheon clubs. How many luncheon clubs that are sensitive to culture and faith are run by the Council? I think it would be good to know, as these would help to address loneliness and support mental health. When I talk to relatives and friends in neighbouring boroughs, they have culturally sensitive luncheon clubs that are run by the council, or by the local community with council funding. How many of those do we have in Islington?

**Response:**

I would have to get you a specific number and I'm very happy to do that for you.

I'm very aware, as you are, that there are many culturally appropriate organisations up and down this borough. I can think of many, especially that support women, including at Nafsiyat and the Westbourne Community Centre. Only this week, at the launch of our Let's Talk Islington open mass diabloué, I met a wonderful woman who has set up a charity within Cally to support more Black Women facing isolation. There are many fabulous women of all ethnicities in this borough supporting each other through really difficult mental health challenges. Thank you again for your question.

**Question (4) from Cllr Ismail to Cllr Lukes, Executive Member for Community Safety:**

Since the stabbing of Sir David Amess MP, the Somali community has suffered badly from islamophobia, as reported on BBC London, Sunday Politics and the Guardian Newspaper. Have you engaged with the Somali community with any support and reassurances; and how and when?

**Response:**

Thank you for your question. Our Council is determined to make our borough the safest it can be and root out all types of hate crime. In the aftermath of the tragic death of Sir David Amess, the Leader and I both contacted a range of community leaders across the borough to send a clear message that the Council stands together with our communities and against hate crime.

Since then, the Council has used Islamophobia Awareness Month to send a clear message that Islamophobia of any kind will not be tolerated in our borough. As you know, we have a thriving and diverse Muslim community in here in Islington, who contribute a great deal to our borough. Those activities during Islamophobia Awareness Month enabled us to showcase the work that our mosques and Muslim communities have done in providing a great deal of support to residents throughout the pandemic; feeding those on lower incomes, helping the homeless, and helping people get vaccinated.

We were involved in delivering an event called Islington Against Islamophobia at Finsbury Park Mosque on 26<sup>th</sup> November which was attended by over 70 people. I was delighted to be one of the speakers there to reinforce that message. The event was also an opportunity to listen to our local communities and hear their thoughts on how we can make Islington even more welcoming and diverse. We looked at the experiences of different groups, including the experiences of Black and Somali Muslims, young Muslims and Muslim women. Councillor Ibrahim spoke about his experiences of being a Black Muslim from a Somali background, and how events in the news can trigger phobias towards certain communities.

We discussed how we can make our borough a safe place. The Council supports the independent Islington Hate Crime Forum, which is committed to working with the Police and community organisations, including Somali organisations, to tackle hate crime, reduce the risk of it taking place, support victims, and improve reporting.

I was inspired at that event by the young Muslim women I met who spoke movingly of the impact of Islamophobic hate crime and their determination to oppose it. I wonder what they think of the Prime Minister, a man who says they look like letter boxes and bank robbers, a comment that Tell Mama linked to a 375% increase in Islamophobic incidents. Luckily for those young women, they live in Islington, and we take hate crime seriously and we oppose Islamophobia.

**Supplementary question:**

Islamophobia and hate crime is a crime to all humanity. The stabbing of Sir David Amess has triggered Islamophobia and hate crime, particularly with the Somali community, and particularly against those who look like me, wearing a hijab. Have you been in touch with our local Somali mosque? I recently attended and there were 400 women all complaining about Islamophobia. Have you contacted them, and have you made any arrangements, because that was a very serious moment, particularly for the Somali community.

**Response:**

Both the Leader and I contacted a whole range of faith and community organisations immediately after the stabbing. We also maintain contact with the Police in order to check on whether there was any increase in reporting of any kind of Islamophobic hate crime in the wake of that event. I'm very glad to report that Police data indicates that there had been no increase in numbers. Islamophobic hate crime is an absolute stain on our borough and we're working very hard to try and tackle it, including through education. We work with a whole range of Somali and other Muslim communities, and we rely on those communities to report hate crime, so we can identify and bring to account the perpetrators, and also to learn from that.

The Hate Crime Forum is a very active organisation and was also involved in some of the reaching out in the immediate wake of that of that murder, as with any other incident which might increase any type of hate crime in the borough. We have been very active we continue to be. I'm very glad to meet with anybody who wants to talk to me about how we can improve that practice because it is a priority of mine.

**Question (5) from Cllr Russell to Cllr Gill, Executive Member for Finance & Performance:**

How many residents are eligible for the council tax reduction scheme this year and how many of these are in arrears with their council tax this year?

**Response:**

Thank you for your question. As you know, we're discussing this topic very soon. Islington Council continues to provide the maximum amount of support possible for those on low-income. Our Resident Support Scheme is one of the most generous in the country. I'm proud tonight that we are proposing to increase the Council Tax Support Scheme to 95%; an investment in the most vulnerable people in the borough. The total number of Islington residents receiving support through the Council Tax Reduction Scheme is currently 26,150, but this total does vary during the year. The number of households in arrears for Council Tax, who receive support through the scheme this year, is 1,354 as of last week. This would equate to about 5% of those accessing the scheme. We continue to support those people in arrears, so that they can clear their arrears and return to a stable financial footing.

**Supplementary question:**

Thank you. I wonder how many of those 1,354 in arrears, have arrears that have accrued from previous years?

**Response:**

Thank you. I don't have that information to hand, but I will look at it and share it with you.

**Question (6) from Cllr Russell to Cllr Ward, Executive Member for Housing & Development:**

How many repairs have been requested in Islington to fix mould in residents' homes each year across the last five years? Please supply aggregated annual Islington figures at the meeting for the last five years and supply a table in writing separately broken down by ward and housing type (estate or street property and building construction type if you hold that data).

**Response:**

Islington Council is determined to provide safe secure and genuinely affordable homes for local people. A vital part of that is ensuring that our current housing stock is kept the highest possible standard. We've taken a comprehensive approach to damp and condensation works on our estates. We will fix leaks, but where there's mould due to condensation, we carry out mould washes and we work with residents to maintain a mould free home. We know that damp and condensation occurs more in homes that are not well heated, and our programme of energy efficiency works will also very importantly help to address problems of damp and condensation in some properties. I will supply the full information to you following the meeting, but the number of homes in which we have undertaken mould treatment works has remained broadly stable over recent years, aside from 2020 when there were fewer reports and people did not want others to work in their homes. There have been 2,687 homes visited for mould since 2017. We don't hold ward level information, but I will write to you with further information.

**Supplementary question:**

I completely agree with you about the importance of tackling mould. I think ventilation as well as good insulation is a really important element of this. Of those 2,687 cases of mould, how many of them were repeat requests?

**Response:**

I'm afraid that I don't have that information to hand, but I'm very happy to speak to senior officers about this.

**Question (7) from Cllr Williamson to Cllr Turan, Executive Member for Health & Social Care:**

There was already a crisis in young people's mental health and support services before Covid-19, but the pandemic has made the situation worse.

Before the pandemic waiting times were long for CAMHS. But with an even bigger growth in demand for mental health and support services, and the escalating NHS recruitment crisis caused by a Tory government asleep at the wheel, we are witnessing a perfect storm – with disastrous effects for our young people. One of my own young constituents has already spent over a year of his childhood waiting to be assessed by CAMHS, and is expected to still wait another year before getting assessed. Waiting times are now at roughly 30 months. While we know the Tory

government rhetoric of parity of esteem for mental health services needs to be matched with reality – with real funding and serious work to bring down waiting times, what is the CCG doing locally to reduce waiting times for CAMHS?

**Response:**

Thank you highlighting this very important topic. The current situation with waiting times for autistic spectrum disorder assessments in Islington and the indeed across the whole of North Central London is a high priority for this Council and all our partners in the sector. I'm all too aware that the current position is unacceptable and we are committed to working in partnership to address the challenges and develop a model for children and young people that reduces delay.

Senior leaders in Whittington Health and the North Central London Clinical Commissioning Group are working to ensure a clear plan to reduce waiting times to 18 weeks and clear the current backlogs across North Central London by 2023. The plan includes provision for additional funding for Islington's neurodevelopment pathway with an additional funded programme in place to reduce the backlog. Islington Council has also been working with Whittington Health to put in place a programme of therapeutic and family support that young people can access while they are on the waiting list. Parents are advised to visit Islington's CAMHS page on the Whittington Health website.

On the wider issue of children and young people's mental health, we have a range of services on offer to support young people's mental health, including CAMHS mental health support teams in schools and online counselling services. However, as we come out of this pandemic, it is vital that the government finally acts on its promises and properly funds mental health support services.

**Supplementary question:**

A lot of the issues with CAMHS services is to do with a massive lack of funding and a recruitment crisis caused by the government. First, can the council campaign on this issue, and second, can we work with the CCG to ensure that any child is seen within a certain time frame, for example before 30 months? My constituents are telling me that waiting lists are getting longer and longer, which is causing despair for families. Can we work with CCG to make sure no one's going beyond 30 months and that clear waiting times are given at the point of initial referrals?

**Response:**

I would be incredibly proud to join you on that campaign, and I am sure that fellow councillors would be too. This is clearly an important issue to our residents. I meet with the CCG regularly and will continue to push this issue, particularly around giving families realistic waiting times.

**171 PRESENTATION FROM MAYORAL CHARITIES - ICAP & FORUM+**

The Council received presentations from two of the Mayor's charities.

Catherine Hennessy, CEO of icap, spoke of their work in supporting the Irish community in London with issues such as anxiety, depression and stress. The organisation offered therapy and counselling services to the community.

Tessa Havers-Strong, Director of forum+, spoke of their work to support the LGBT+ community in Islington and Camden, including services for victims of hate crime.

The Council thanked icap and forum+ for their work and for attending the meeting.

**172 COUNCIL TAX SUPPORT SCHEME 2022/23**

Councillor Gill moved the motion. Councillor Debono seconded. Councillor Russell contributed to the debate.

The recommendations in the report were put to the vote and CARRIED.

**RESOLVED:**

- (i) To change the way the Council Tax Support is calculated so that:
- The cap for working age households reduces from 8.5% to 5%. This will increase from 91.5% to 95% the level of support they would have been entitled to under the old council tax benefit rules.
  - Payment of Council Tax Support on two homes is allowed in specific circumstances.
  - The age for a Class 2 reduction is aligned with the increase in state pension age.
- (ii) To agree to adopt the Council Tax Support Scheme for 2022/23 as contained in Appendix A to the report submitted.
- (iii) To retain the amendments to council tax agreed at full Council on 10 December 2020, with 1) to 3) below continuing to apply, whilst updating 4) below to charge a premium at the maximum that is now allowed. This will mean increasing from 100% on the council tax of all properties that have remained empty for over 2 years to the amounts set out in 4) below.

This continues the Council's practice to discourage properties remaining empty that impacts on the economic and social well-being of the borough. There will be support for any vulnerable residents impacted.

1) council tax exemption classes A (unoccupied and unfurnished property that requires or is undergoing major repairs) and C (unoccupied and unfurnished property) will have a discount of 0% for all cases;

2) council tax discount for second homes will be 0% in all cases;

3) council tax discount for empty furnished lets will be 0% in all cases; and

4) a premium will be charged at the maximum percentage allowed of 100% on the council tax of all properties that have remained empty for over 2 years but less than 5 years in all cases.

a premium will be charged at the maximum percentage allowed of 200% on the council tax of all properties that have remained empty for over 5 years but less than 10 years in all cases.

a premium will be charged at the maximum percentage allowed of 300% on the council tax of all properties that have remained empty for over 10 years in all cases.

**173 CHIEF WHIP'S REPORT**

The Mayor noted that the report has been circulated in the second despatch of papers.

Councillor Hyde moved the recommendations in the report. Councillor Woolf seconded.

The recommendations in the report were put to the vote and CARRIED.

**RESOLVED:**

- i. That Councillor Gilgunn be appointed to the Environment & Regeneration Scrutiny Committee for the remainder of the municipal year or until a successor is appointed.
- ii. That John Everson, Director of Adult Social Care, be appointed to the Health and Wellbeing Board for the remainder of the municipal year or until a successor is appointed.
- iii. That Councillors Khurana, Khondoker and Graham be appointed as substitute members of the Audit Committee for the remainder of the municipal year or until successors are appointed;
- iv. That Councillor Khondoker be appointed as a substitute member of the Licensing Committee for the remainder of the municipal year or until a successor is appointed;
- v. That Councillor Khondoker be appointed as a substitute member of the Health & Care Scrutiny Committee for the remainder of the municipal year or until a successor is appointed.
- vi. That Councillor Poyser be appointed to the Grievance Appeal Committee for the remainder of the municipal year or until a successor is appointed
- vii. That Councillor Weekes be appointed to the Schools Forum for the remainder of the municipal year or until a successor is appointed.

- viii. That Miss Maxine Telfer be appointed to serve on Independent Admission Appeals Panels

**174 CONSTITUTION REPORT**

The Mayor noted that the report has been circulated in the second despatch of papers.

Councillor Hyde moved the recommendations in the report. Councillor Woolf seconded.

The recommendations in the report were put to the vote and CARRIED.

**RESOLVED:**

- i. To approve the amendments to the Constitution set out in the appendices to the report;
- ii. To note that the amendments will take effect from 10th December 2021, with the exception of the revisions to the procurement rules (paragraph 4.2), that will come into effect from 1st January 2022.

**175 NOTICES OF MOTION**

The order of motions was amended to take those with proposed amendments first.

Motion 3: Rename the Ring Cross Estate after Yvonne Conolly, the first Black female Headteacher in Britain

(title amended to '*Celebrating Yvonne Conolly, the first Black woman Headteacher in Britain*')

The Mayor advised that a proposed amendment to this motion has been circulated in the second despatch of papers.

Councillor Ismail moved the motion. Councillor Jackson moved the amendment. Councillor Russell contributed to the debate.

Councillor Ismail exercised her right of reply on the motion. Councillor Jackson exercised his right of reply on the amendment.

The amendment was put to the vote and CARRIED.

The motion as amended was put to the vote and CARRIED.

**RESOLVED:**

- i. To Rename Ring Cross Community Centre after Yvonne Connolly to mark her achievement, the first Black woman Headteacher in Britain, as a sign to encourage black youth to learn and understand their proud history.
- ii. To install a plaque to commemorate Yvonne Connolly's contribution to Holloway Ward and Islington.

- iii. To Collaborate with Caribbean Teachers Association annually exhibition and workshop of her work and achievement in Islington History Museum so it encourages Black Youth in Islington/UK and families too.
- iv. To support the innovative work which has been carried out by the Runnymede Trust, the Black Curriculum and others to engage young people and teachers with more expansive, representative and inclusive histories of Britain, to overhaul the curriculum to better educate about the United Kingdom's role in slavery, and to support calls from the National Education Union to 'review the curriculum to ensure it embraces the fact that Britain is rooted in Black and global history, achievement and culture and includes the achievements of Black Britons; as recommended by the Stephen Lawrence Inquiry.

Motion 7: Pause and Review the Edmonton Incinerator Project  
(title amended to '*A green solution for Islington's waste*')

The Mayor advised that a proposed amendment to this motion has been circulated in the second despatch of papers.

Councillor Russell moved the motion. Councillor Champion moved the amendment. Councillor Heather contributed to the debate.

Councillor Russell exercised her right of reply on the motion. Councillor Champion exercised her right of reply on the amendment.

The amendment was put to the vote and CARRIED.

The motion as amended was put to the vote and CARRIED.

**RESOLVED:**

- i. To continue to work with the NLWA and Labour Mayor of London to produce an EfW facility which maintains the highest possible environmental standards, produce as much renewable energy as possible and contribute to higher rates of recycling.
- ii. To continue to work with residents, businesses and organisations in Islington to reduce waste, increase recycling and move towards a circular economy in line with the Council's commitments to net zero and waste reduction.
- iii. To work with the NLWA in a transparent and accountable way to include the regular updating of the Council Environment and Regeneration Scrutiny Committee by NLWA officers.

Motion 1: Good, well paid jobs for local people

The motion was moved by Councillor Heather in the absence of Councillor Shaikh.

The motion was put to the vote and CARRIED.

**RESOLVED:**

- i. To continue supporting local people into good, well-paid work through innovative measures such as targeting in-need sectors such as health and social care
- ii. To work with local schools and colleges to reduce the number of young people who are not in education, training or employment
- iii. To keep working with local businesses to encourage them to pay the real Living Wage to their workers, making Islington a fairer and more equal place for all
- iv. Work with trade unions to develop community campaigns to challenge insecurities in the labour market, improve union membership and tackle the exploitative nature of the gig economy

Motion 2: Stop the Government making local people pay for the pandemic

Councillor Picknell moved the motion. Councillor Chowdhury seconded.

The motion was put to the vote and CARRIED.

**RESOLVED:**

- i. To call on Central Government to provide sustained, adequate and fairly distributed funding to public services, including councils, and not impose further austerity.
- ii. To work with LGA Labour on the 'Stop the Squeeze' campaign, seeking to stop Central Government increasing Council Tax and putting the burden on local people.
- iii. To continue supporting local people with the cost of living crisis through targeted support to those most in-need.

Motion 5: A cleaner, greener, healthier Islington

Councillor Champion moved the motion. Councillor Gantly seconded.

The motion was put to the vote and CARRIED.

**RESOLVED:**

- i. To continue to work locally, and in partnership with London councils and City Hall to tackle the climate emergency, reaching net zero carbon by 2030.
- ii. To write to the Secretary of State for Business, Energy and Industrial Strategy, calling for the Government to match Islington's ambition with real funding for

climate resilience, conversion to heat pumps, decarbonisation of the transport network, and subsidies to support further local energy generation and storage.

- iii. To build on the success of our climate festival, launching a new climate hub service to provide residents and businesses with the advice and information they need to make low-carbon decisions, alongside a climate pledge tool, allowing everyone to set their own decarbonisation target on our journey to net zero together.
- iv. To campaign for investment in green jobs, a just transition, climate resilience measures and a decarbonised public transport network to support our recovery.

Motion 4: Affirmation of membership of Stonewall's Diversity Champion scheme

Councillor Russell moved the motion. Councillor O'Halloran contributed to the debate.

The motion was put to the vote and CARRIED.

**RESOLVED:**

- i. To continue demonstrating leadership on LGBTQ+ equality and inclusion in the workplace to residents, businesses and other organisations in the borough.
- ii. To maintain its membership of Stonewall as a Diversity Champion and continue participating in Stonewall's UK Workplace Equality Index to measure and compare the Council's performance on workplace LGBTQ+ inclusion on a national level.

The meeting closed at 10.30 pm

**MAYOR**



## COUNCIL MEETING – 3 MARCH 2022

### PETITION DEBATE

**Motion to debate the petition:**  
**'Stop Islington Council's closure of local roads'**

Motion moved by: Cllr Rowena Champion, Executive Member for Environment & Transport

This Council notes that:

- In October 2014 this Council agreed to introduce measures to encourage members of the public to actively participate in Full Council meetings, including allowing questions without notice to be asked of members of the Executive and the Chairs of Scrutiny committees, making it easier for members of the public to set up petitions by introducing e-petitions, and allowing a debate at an ordinary meeting of full Council if a petition attracts 2,000 signatures or more.
- A petition was received at the Council meeting on 9 December 2021 which had over 2,000 signatures.

This Council resolves to:

- Continue to encourage residents to participate in local democracy by carefully considering the concerns raised in the petition and to undertake the debate in a spirit of openness and transparency.
- Note the petition.

**The text of the petition is set out overleaf.**

**Petition received at the 9 December 2021 meeting of the Council**

**Stop Islington Council's closure of local roads**

Islington Council is using the Covid19 outbreak to push through major changes to the streets of Islington. Closing roads to through traffic and creating more traffic and pollution for the already busy streets that are not able to be closed.

Lack of consultation, lack of information and all put forward under the guise of people friendly streets.

If you're against this massive change that is starting in the St Peters ward of Islington but will spread like wildfire please sign your name so this can be presented to the council. This will mainly effect Islington residents but if you are a trade body please comment.

**10,802 signatures received.**



## COUNCIL MEETING – 3 MARCH 2022

### QUESTIONS FROM MEMBERS OF THE PUBLIC

**1 Gill Weston to Cllr Ward, Executive Member for Housing & Development:**

In 2012 the Council began work on plans for accommodation for 14 people with learning disabilities to be built at Windsor Street. In 2014 the Council's financial evaluation projected that the development would cost £2.298 million comprising £1.874 million build cost and £0.424 million development fees and other expenses, but noted that after 30 years the scheme would still have a £1.430 million deficit and that it would be over 30 years before the annual and cumulative revenue income would exceed running costs, depreciation charges and debt management costs. In 2018 the Council awarded itself planning permission for the development at Windsor Street (but to accommodate 11 people). Nearly four years later, building work has just begun. Please will the Council explain what are the current estimated costs – in terms of build costs, development fees and all other expenses?

**2 John Hartley to Cllr Champion, Executive Member for Environment & Transport:**

Barnsbury suffers from some horrendous traffic. Many vehicles cut through totally inappropriate roads such as: Offord Road, Barnsbury Street, Theberton Street and Cloudesley Place. The junction at Roman Way and MacKenzie Road is far too busy for people on bikes to be safe. The whole Barnsbury area is desperately in need of a Low Traffic Neighbourhood and when the Council announced that this would be implemented in March 2021 we were delighted. But that just didn't happen. We look on the other Islington LTNs (in St Peters, Canonbury, Highbury, etc.) green with envy. Now we understand that our LTN will be preceded by an extensive Engagement and Design process, which was due to start "Autumn 2021". We are perfectly willing to "engage" and "design" along with the rest of the community but, please tell us: What will the process be, and most important, when will it start?

3 **Harry Nugent to Cllr Champion, Executive Member for Environment & Transport:**

How can the council let their own fleet of vehicles pass through the LTNs without being fined but Tradesman, Undertaker's and Funeral Processions can't?

4 **Rebekah Kelly to Cllr Lukes, Executive Member for Community Safety:**

In response to the Islington Together, Walk for women and the Safe Haven scheme. Why is women's safety fears in LTNs not considered a priority? Women feel unsafe walking through deserted neighbourhoods, where there are no businesses to act as "Safe Havens", women feel unsafe after dark when there is often no people around. The restriction of traffic adds to this feeling of being alone, and these concerns have been diluted in the consultation process that has been lobbied by cycling campaigns.

5 **Finella Craig to Cllr Champion, Executive Member for Environment & Transport:**

From the comparative lack of garden waste generated locally, to the high proportion of flats where architectural issues often make recycling more difficult, the obstacles faced by boroughs such as ours who are working hard to improve recycling rates are complex and structural.

What steps are being taken to address these challenges and increase recycling rates, as well as driving down waste generation through reduce and reuse initiatives, and in particular what action is being taken to tackle period waste?

6 **Ernestas Jegorovas-Armstrong to Cllr Chapman, Chair of the Children's Services Scrutiny Committee:**

The last Children's Services Scrutiny Committee meeting happened before last Full Council (December 2021), over 100 days ago. There has not been a meeting in January or February, why? May the council make sure that there is a Children's Services Scrutiny Committee meeting by next Full Council?

7 **Nicholas Brainsby to Cllr Champion, Executive Member for Environment & Transport:**

A lack of charging points is one of the main reasons why consumers are reluctant to buy an electric vehicle (EV). What plans does the Council have to materially increase and properly maintain the number of fast charging points in Islington?

I am an EV driver and am frustrated by the lack of fast chargers in Islington and the fact that often they are out of order for long periods of time.

8 **Minda Burgos-Lukes to Cllr Lukes, Executive Member for Community Safety:**

Every one of us has a role to play in making Islington a safe place for all - where women are free from harassment and violence, young people can grow up in safe environments with bright futures to look forward to, and Black and Brown, migrant, disabled, LGBTQ+, working class people and people of faith can go about their lives freely and happily, without fear of prejudice and discrimination.

What plans does the Council have to make Islington a safer and more dignified place for all over the coming years, and what's your message to the wider community about how we can help build this place together?

9 **Benali Hamdache to Cllr Ward, Executive Member for Housing & Development:**

Can the Council let me know how much money the Council has had to spend responding to housing disrepair legal cases each financial year since 2019?

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### **COUNCIL MEETING – 3 MARCH 2022**

#### **QUESTIONS FROM MEMBERS OF THE COUNCIL**

**1 Cllr Poole to Cllr Comer-Schwartz, Leader of the Council:**

To ask the Leader of the Council, why has there be no progress on the urgent work to save the Royal Northern War Memorial despite the Leader's assurances given to Council in September last year?

**2 Cllr Chowdhury to Cllr Turan, Executive Member for Health & Social Care:**

The COVID-19 pandemic has had an enormous impact on the mental health of people in every part of our community. From those of us who've lost loved ones, to the trauma experienced by our dedicated health and social care staff, and the endemic loneliness felt by those living alone and in isolated care settings, this terrible time has touched us all. As we emerge from pandemic, what steps is the Council taking to support our community and those who've cared for us throughout it?

**3 Cllr Ibrahim to Cllr Ngongo, Executive Member for Children, Young People & Families:**

It was deeply moving to see the parents of so many young people who've been lost to and affected by the horrors of knife crime gather in my ward at Arsenal Football Club in January for the No More Red campaign. Their bravery and dignity in standing against violence is truly inspiring and we will always stand in solidarity with them.

What actions are the Council taking to reduce youth violence, support young people into better life choices, and make this tragic cycle of heartbreaking loss a thing of the past?

4 **Cllr Ismail to Cllr Ward, Executive Member for Housing & Development:**

It is almost 12 years since the Labour administration took over this Council and I would like to congratulate them on building more homes.

This said, many Islington social housing residents, in particular, Holloway, live in some of the worst properties that are riddled with dampness and include households with children under five, who are also living with mice and vermin. They are being left behind and are not being cared for as they should be due to Islington Labour's exceptionally bad record for not resolving these issues. The inadequate services (as per my casework and yours) as Ward colleagues, have seen the mice cases and damp issues increase over the past 8 years, which is clearly shown with regards to cases in my inbox and yours. Some of the most vulnerable are suffering as are our children.

As you are fully aware, these damp properties impact our residents' health and are costing our NHS. These tenants regularly visit their GP's, they are calling the ambulance services because they are hospitalised due to the health issues raised by living with dampness. Our NHS has had a lot to deal with during the pandemic and these damp properties are contributing to putting further pressure on our NHS. Some of our Holloway residents are paying a very high price with regards to their health because of your lack of leadership and commitment on housing and development during the last 6 years as the executive lead.

What have you done for your tenants and what will you be telling them when you ask them to vote for you in the May 2022 Elections; it has been 8 years since you became Ward Councillors and it has been 6 years as an executive. When will you resolve the issues that are paramount to your tenants and your prospective voters?

5 **Cllr Ismail to Cllr Champion, Executive Member for Environment & Transport:**

As a resident of Bunhill for decades, many of my friends and neighbours are linked to Bunhill Heat and Power Energy 2. They have mentioned to me that they are not saving on heating and power as they were promised they would when signing up for this and it is not working properly as you know, and residents have complained too. Should we be asking what the overspend is for Bunhill Heat and Power? We believe this to be in the region of £7m for tax-paying residents and why are residents connected to Bunhill Heat and Power Energy 2 not saving on energy costs as promised by Islington Council and how much is the Council actually subsidizing this? The customer services can only be described as an extremely poor level of service, not to mention the other issues as myself a Islington Council tenant too.

6 **Cllr Jeapes to Cllr Champion, Executive Member for Environment & Transport:**

Last month saw the introduction of Islington's eighth people-friendly streets neighbourhood in the St Mary's Church area, reducing traffic, making our streets more liveable with easier and safer walking, wheeling and cycling. It's been particularly pleasing to see so many greening elements included as part of the scheme, as well as Blue Badge exemptions for camera-enforced filters from day one.

As Islington moves forward with plans to make our streets cleaner, greener and healthier, what additional steps will the Council be taking to ensure that all residents are able to enjoy the benefits of this transformative work?

7 **Cllr Russell to Cllr Ward, Executive Member for Housing & Development:**

I was concerned to see in the report of the Executive Member for Finance to Policy and Performance Committee on Jan 20th 2022, that there has been a 60% increase in housing disrepair legal cases since 2019/20 financial year. Has the council analysed what investment is required in the housing team to reduce housing disrepair legal cases in the first place?

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Community Wealth Building Directorate  
Town Hall, Upper Street, N1 2UD

**Report of: Executive Member for Housing and Development**

<b>Meeting of:</b>	<b>Date:</b>	<b>Ward(s):</b>
Council	3 March 2022	All

<b>Delete as appropriate</b>	Exempt	Non-exempt
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## **SUBJECT: Future arrangements for the management of Islington's waste: Adoption of North London Waste Plan**

### **1. Synopsis**

- 1.1 The seven North London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest (the Boroughs) have worked jointly to produce the North London Waste Plan ('NLWP'). The NLWP will cover the period up to 2035 and will form part of the statutory Development Plan for these areas.
- 1.2 The purpose of the NLWP is firstly to ensure there will be adequate provision of suitable land to accommodate waste management facilities of the right type, in the right place and at the right time to manage waste generated in North London up to 2035; and secondly to provide policies against which planning applications for waste facilities will be assessed, alongside other relevant planning policies/guidance. Islington has one existing waste site at the Hornsey Street Reuse and Recycling Centre. The NLWP identifies no further land for waste uses in Islington.
- 1.3 The draft NLWP has been through several rounds of consultation and has been produced in line with relevant legislative and governance procedures.
- 1.4 The Inspector's final report was received on 27 October 2021 which, subject to modifications, found the NLWP sound and appropriate for adoption. The NLWP can therefore now be adopted by Islington and the other North London Boroughs.

## **2. Recommendations**

- 2.1 To approve for adoption the North London Waste Plan (appendix 1) which incorporates the main modifications recommended by the Planning Inspector (appendix 3) and other minor modifications previously approved by officers.
- 2.2 To delegate authority to the Corporate Director of Wealth Building to approve administrative alterations, typographical amendments, to improve cross referencing (e.g para numbering, page numbering) and typographical errors prior to the publication of the final plan.
- 2.3 To note that the approval of the NLWP is separate to that for any planning application for a waste facility, including the proposed Energy from Waste facility in Edmonton which was granted a Development Consent Order by the Secretary of State on 24 February 2017.

## **3. Background**

- 3.1 The NLWP sets out the planning framework for waste management in the North London Boroughs covering the period up to 2035. The requirement to produce a waste plan is set out in national and London planning policy. The NLWP identifies land suitable for waste management use and the policies for determining waste planning applications. The NLWP forms one part of the Islington Local Plan alongside three other Development Plan Documents which are currently being prepared; the Strategic and Development Management policies, the Site Allocations and the Bunhill and Clerkenwell Area Action Plan. These three documents are separate to the NLWP and unique to Islington. The NLWP is a joint document which has been developed with seven North London boroughs.
- 3.2 The seven North London boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest ('the boroughs') agreed in 2006/07 to undertake a joint Development Plan Document (the NLWP) to meet their waste needs as set out in the London Plan (their 'apportionment'). At the same time, the Boroughs agreed a Memorandum of Understanding (MoU) on how they would work together to prepare the joint plan and progress it through to adoption by all seven boroughs.
- 3.3 The Boroughs originally submitted the joint waste plan for Independent Examination by a Planning Inspector in February 2012. The Planning Inspector considered that the plan did not comply with the legal requirements of the Duty to Co-operate, which was introduced by the Localism Act when the plan was at an advanced stage. Following this, the Boroughs commenced work on jointly preparing a new version of the plan which fulfilled the Duty to Cooperate.
- 3.4 The NLWP is distinct from the Council's function as a Waste Collection Authority and the North London Waste Authorities responsibility as Waste Disposal Authority. In addition to ensuring suitable land is available to manage household waste the NLWP also has to consider the management of waste from businesses and the construction industry as well as other more specialist sources of waste. The process of preparing the NLWP is separate to that for any planning application for a waste facility which will need to be consulted on and determined separately.

## Content of the Plan

3.5 The NLWP provides the basis for making planning decisions on waste facilities and sets out the baseline for levels of waste from all waste sources in North London. The intention of the NLWP is to set out the planning framework for the management of North London's waste and 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 this waste.

The NLWP:

- sets out the waste management needs of North London and demonstrate how these needs will be met during the plan period;
- identifies suitable sites and broad areas for waste management facilities;
- includes development management policies against which planning applications for waste development will be determined; and
- safeguards existing waste sites

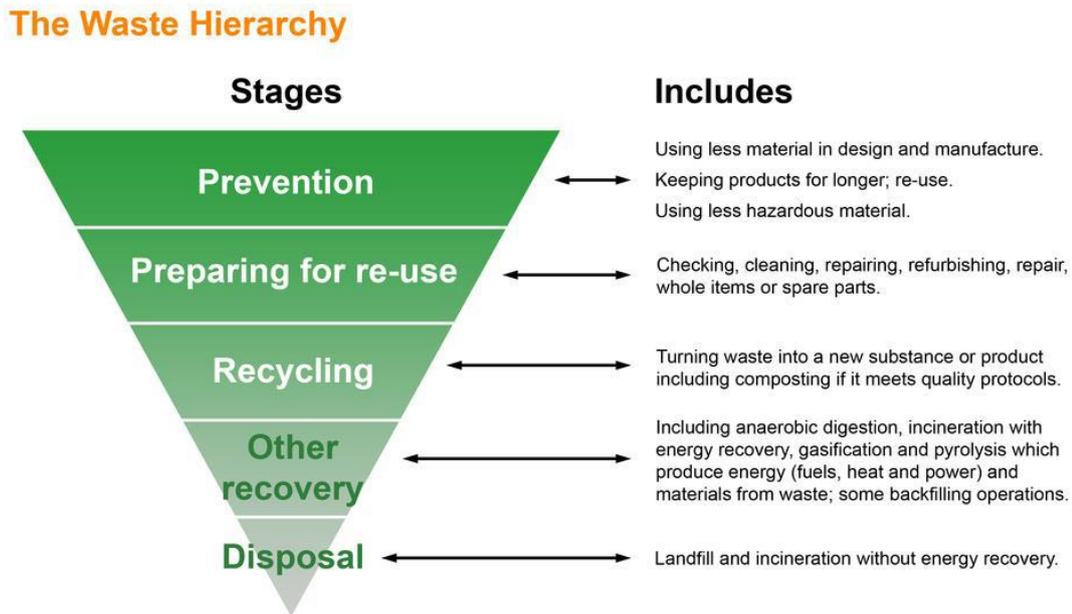
3.6 The NLWP models North London's future waste arisings for each of the relevant waste streams which must be planned for incorporating various economic and population growth assumptions in order to identify the need. To meet these future waste management needs the NLWP seeks to achieve net-self sufficiency; net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste generated in North London.

3.7 In considering future waste management needs the NLWP takes into account the recycling targets set out nationally and at a London level. The London Plan (March 2021) sets a target of 65% recycling of municipal waste by 2030. This ambitious London-wide target is informed by the London Environment Strategy which aims to achieve 45% household waste recycling by 2025 and 50% by 2030, which when combined with higher targets for business waste achieves the overall target of 65%. The NLWA contributes to these targets with a Joint Waste Strategy demonstrating how the waste collected by the boroughs will be managed.

3.8 The need for capacity across the waste streams was considered against the existing waste management capacity which was insufficient to meet these needs. In line with London Plan policy existing waste capacity is protected. An extensive site and area search and selection process was undertaken involving a number of stages which resulted in the plan identifying further land in North London suitable for a range of new waste facilities – the land is identified as "Priority Areas".

3.9 The NLWP is part of a wider but integrated approach that will help to deliver sustainable waste management in North London, alongside such measures as improved resource management, and waste prevention and reduction strategies which are outside the planning framework. The NLWP aims and objectives reference and integrate the waste hierarchy – the principle behind the waste hierarchy is to drive the management of waste up the waste hierarchy as set out below.

Figure 1: Diagram of the Waste Hierarchy



3.10 As waste planning authorities (WPA), Councils are responsible for producing waste Local Plans that cover the land use planning aspect of waste management for their areas in line with the Waste Management Plan for England. This is distinct from the Council’s function as a Waste Collection Authority (WCA) and the North London Waste Authorities function as Waste Disposal Authority (WDA). Both these functions relate to the Council’s responsibility for collecting and disposing of household waste. The land use planning aspect of waste management and the Council’s role as planning authority means the NLWP has to consider all sources of waste including the waste produced by businesses and the construction industry as well as householders waste. Other more specialist sources of waste such as hazardous waste are also considered by the NLWP.

**Consultation, submission, hearings, modifications and further modifications**

3.11 The Executive agreed in July 2015 to publish the draft NLWP for consultation. The Draft Plan consultation took place that summer and provided the first opportunity since the previous plan was not adopted for stakeholders to make comments on the strategy for future waste management in North London, potential locations for new facilities across the area, and policies.

3.12 The NLWP was approved by Islington at Full Council on 6 December 2018 for publication consultation (Regulation 19) and submission. As part of the formal approval, Full Council agreed that delegated authority for any changes to the North London Waste Plan and supporting documents prior to, and during, the Independent Examination into the Plan would be given to Corporate Director of Environment and Regeneration in consultation with Executive Lead Member.

3.13 The NLWP was submitted to the Secretary of State 8 August 2019 and the Independent Examination hearings took place in Camden, the lead borough for the NLWP, on 20 and 21 November 2019.

- 3.14 In advance of the hearings the boroughs presented some proposed modifications to the Inspector. The modifications responded to representations received at the Regulation 19 consultation. Following the Examination hearings the Boroughs worked on additional modifications to address the issues raised by representors and the Inspector at the hearings. These modifications were approved by each borough.
- 3.15 The modifications consultation ran for 6 weeks from October to December 2020. There were no Islington specific comments made during the consultation. Further modifications were proposed as a result of comments received as part of the modifications consultation and approved by each borough again.

## **Adoption**

- 3.16 The further modifications and representations made during the modifications consultation were submitted to the Inspector in May 2021. The Inspector provided the north London boroughs with his report on 27 October 2021 (appendix 2). The report confirms that subject to modifications the plan meets the required legal and soundness tests, including duty to co-operate and procedural requirements and is suitable for adoption. The Councils requested that the Inspector recommend the main modifications necessary to rectify matters that make the NLWP unsound and unable to be adopted; the Inspector considered a number of main modifications necessary (appendix 3). The NLWP (appendix 1) incorporates the main modifications and minor modifications. The main modifications are summarised in the Inspectors report (appendix 2) and include:

- Amended aims and objectives to ensure general conformity with the London Plan.
- Amendments to Section 4 to ensure that the approach to the management of waste and the identification of the location for new facilities are consistent with the aims and objectives.
- Providing a clearer explanation of the evidence and the methodology for the identified waste that needs to be managed.
- Further explaining the selection process to identify areas to manage waste needs, ensuring this is consistent with the spatial principles of the Plan.
- Providing further explanation/justification for the identification of the Preferred Areas for the management of waste.
- Ensuring that waste management development proposals provide an adequate balanced approach to protect people and the environment whilst delivering the aims, objectives and spatial principles of the Plan.
- Revising the monitoring and implementation framework to provide a more robust mechanism to assess the delivery of the Plan.
- Revising the guidance in Appendix 2 regarding the detailed development requirements to accompany any future planning applications for waste management development.
- Other modifications for consistency with national policy.

## **4. Implications**

### **4.1 Financial implications:**

Under the NLWP MoU the boroughs have agreed to share the costs equally. The costs to be shared include the cost of the consultants, the one member of staff employed by Camden as the lead borough for the various consultations and the cost of the Independent Examination. The costs of preparing the NLWP have been included in the overall budget for preparation of Islington's Local Plan.

## **4.2 Legal Implications:**

The Council, at the meeting of the Executive on 16 July 2015, agreed a revised Memorandum of Understanding (MoU) about joint working on the NLWP. This has been agreed and signed by all other NLWP boroughs. The MoU sets out how the boroughs will cooperate and carry out work to prepare the NLWP, makes Camden the lead borough and deals with financial matters and dispute resolution. Other legal implications are included within the body of the report.

## **4.3 Environmental Implications and contribution to achieving a net zero carbon Islington by 2030:**

The main environmental impacts of the NLWP are the disposal of waste through incineration and landfill and the transport of waste. The plan aims to mitigate these impacts by reducing the amount of waste sent to landfill and encouraging recycling and by ensuring that north London is self-sufficient in terms of waste management, reducing the transport-related impacts. It sets out a robust framework for managing waste in a sustainable manner. The environmental and other impacts of the North London Waste Plan were considered in detail as part of the Sustainability Appraisal for the plan. This is available on the NLWP website.

## **4.4 Equalities Impact Assessment:**

The council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding.

Previously Resident Impact Assessments (RIA) have been completed at each reporting stage of the NLWP. The RIA concluded that there were no negative impacts for people with protected characteristics in Islington. Given that there are no new waste sites or 'priority areas' in Islington, there is limited scope for negative impacts. There may be positive impacts given that the plan encourages recycling across the borough and also seeks to ensure that recycling facilities provided as part of new development are inclusively designed and accessible.

Further to the RIA, a EQIA screening tool has been completed and shows no negative impacts. Notwithstanding this a more in-depth Equalities Impact Assessment has been carried out on the NLWP by Urban Vision consultants, as part of the plan-making process. This has been updated as an addendum for the adoption plan (appendix 4).

## **5. Reasons for the decision:**

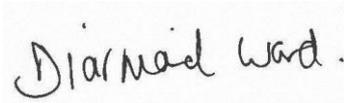
- 5.1 Each Local Planning Authority is required to have a waste plan. Adopting this joint NLWP will help achieve sustainable waste management by providing a sound basis for the provision of waste management infrastructure, contributing to the conservation of resources by improving the efficiency of processing and making better use of waste created within North London.

## Appendices

- Appendix 1 – North London Waste Plan incorporating main and minor modifications
- Appendix 2 – Report on the Examination of the North London Waste Plan
- Appendix 3 – Main modifications appendix to Report on the Examination of the North London Waste Plan
- Appendix 4 – North London Waste Plan adoption stage Equality Impact Assessment addendum report

**Background papers:** None

### Signed by:



21 February 2022

Executive Member for Housing and Development

Date

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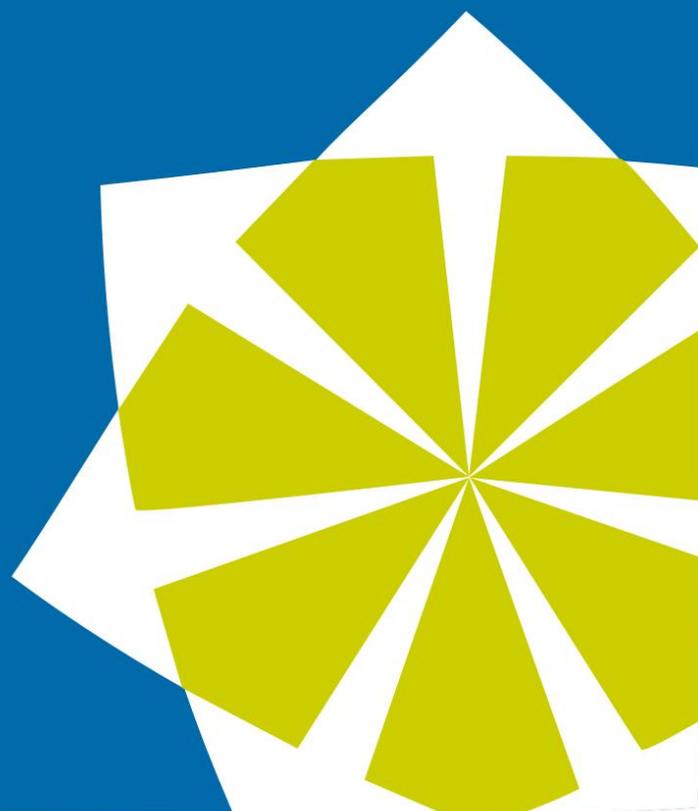
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# North London Waste Plan

November 2021



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## 1. Introduction and Background

1.1 North London covers a large swathe of London from the inner city into the Green Belt of outer London. The geographical extent takes in both the inner London Boroughs of Camden, Hackney and Islington, and the outer London Boroughs of Barnet, Enfield, Haringey and Waltham Forest (see Figure 1). The land within the North London Boroughs spans an area of 293 square kilometres.

### What is the North London Waste Plan?

1.2 The seven North London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest are working together to produce the North London Waste Plan (the 'NLWP'). The NLWP also covers part of the area of the London Legacy Development Corporation (LLDC), a Mayoral Development Corporation, which is the planning authority for a small part of Hackney and Waltham Forest<sup>1</sup>. Figure 1 shows the North London Waste Plan area.

1.3 The NLWP has two main purposes:

- to ensure there will be adequate provision of suitable land to accommodate waste management facilities of the right type, in the right place and at the right time up to 2035 to manage waste generated in North London; and
- to provide policies against which planning applications for waste development will be assessed, alongside other relevant planning policies/guidance.

1.4 The key elements of the NLWP are:

**The Aim and Strategic Objectives:** These are overarching principles which have steered the development of the NLWP.

**The Spatial Principles:** The spatial principles flow from the Strategic Objectives and provide the strategic direction for the detailed policies of the NLWP and inform site/area selection. They reflect the physical and planning components that influence the Plan and guide the identification of opportunities and constraints for waste planning in North London.

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<sup>1</sup> The relationship of the NLWP to the LLDC is discussed further in para 1.15 below

**The Provision for North London's Waste to 2035:** This sets out the preferred option for how the waste management needs for North London will be met for each waste stream over the Plan period.

**The Policies:** These are strategic policies through which the aims and objectives, waste management strategy and Spatial Principles will be delivered. The policies provide the waste planning framework against which applications for waste development will be assessed across the Plan area.

1.5 The NLWP plans for all principal waste streams including:

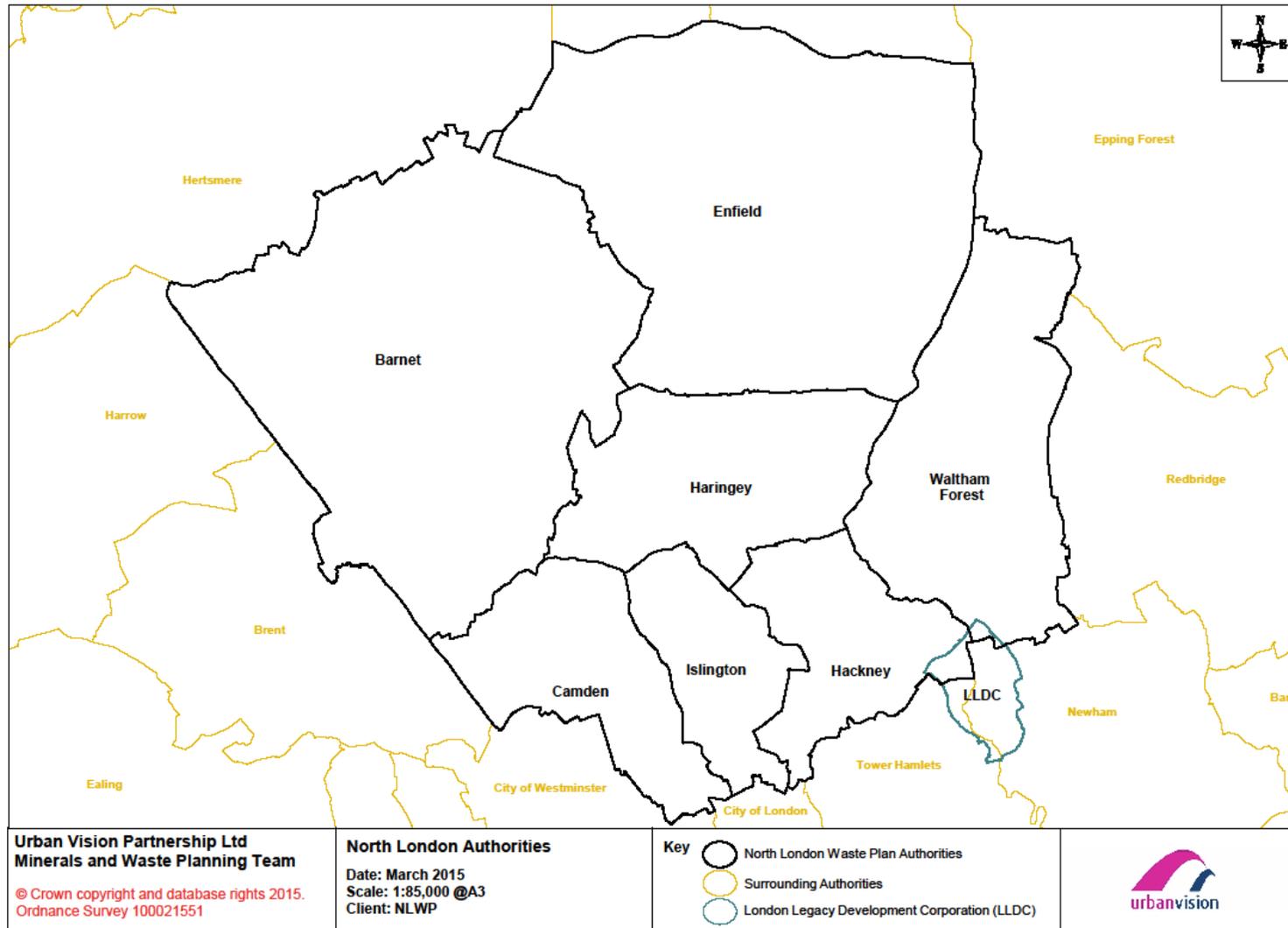
- **Local Authority Collected Waste (LACW):** Waste collected by a Local Authority, including household and trade waste;
- **Commercial and Industrial (C&I):** Waste produced by businesses and industry;
- **Construction, Demolition & Excavation (CD&E):** Waste generated as a result of delivering infrastructure projects, building, renovation and the maintenance of structures;
- **Hazardous:** A sub category of all waste streams where the material produced is hazardous and requires specialist treatment;
- **Agricultural waste:** Waste produced by farming and forestry activity;
- **Waste Water / Sewage Sludge:** Waste produced from washing, cleaning and hygienic activities to create waste water and sewage effluents; and
- **Low level radioactive waste (LLW):** Waste associated with the undertaking of x-rays and laboratory testing using low level radioactive substances.

**How does the North London Waste Plan fit with other plans and strategies?**

1.6 The seven North London Boroughs, as Waste Planning Authorities (WPA) are required to prepare a Waste Local Plan. This requirement comes from Article 28 of the European Union (EU) Waste Framework Directive, the National Waste Management Plan for England and the National Planning Policy for Waste (NPPW).

1.7 The NLWP is prepared in line with the requirements of the Planning and Compulsory Purchase Act 2004, the Waste (England and Wales) Regulations 2011 and the Town and Country Planning (Local Planning) (England) Regulations 2012, The National Planning Policy Framework (NPPF) and supporting Planning Practice Guidance (PPG) direct how Local Plans should be prepared and the National Planning Policy for Waste (NPPW) provides detailed requirements specific to waste plan preparation and content.

Figure 1: North London Plan Area



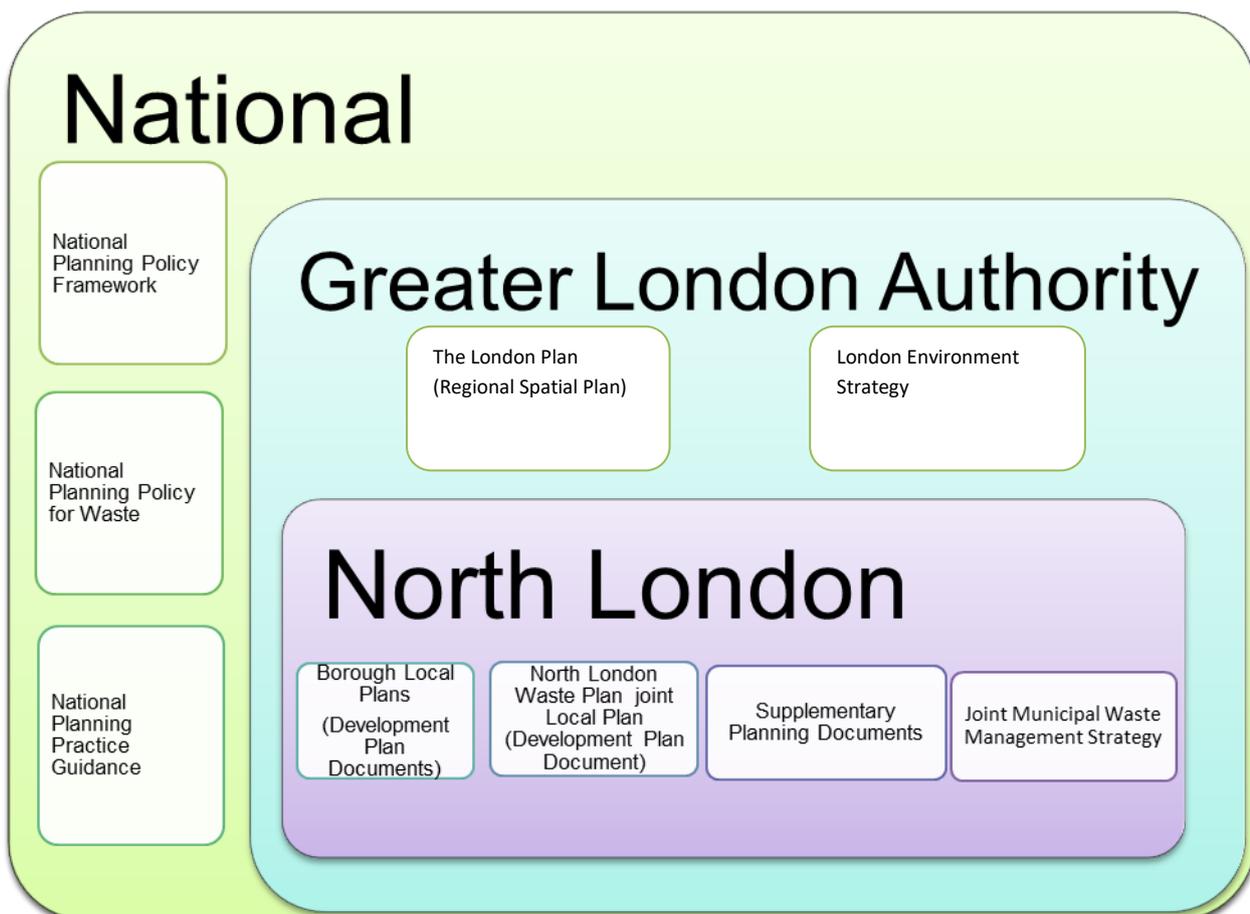
- 1.8 Once adopted, the NLWP will form part of the ‘Development Plan’ for each of the North London Boroughs which comprises the London Plan and borough Local Plans (see Figure 2). The NLWP must be in general conformity with the London Plan, which sets the strategic framework for the NLWP, and consistent with other documents in borough Local Plans. The NLWP should be read alongside other relevant policies within the wider Development Plan. The Mayor published a draft London Plan for consultation in December 2017. The Examination in public took place in early 2019 with publication of a new London Plan in March 2021. .
- 1.9 The London Plan projects how much LACW and C&I waste is likely to be generated in the capital over the next 20 years and apportions an amount of these two waste streams to each borough. The North London Boroughs have pooled their apportionments and will meet this collectively through existing sites and land allocated in the NLWP.
- 1.10 Each of the seven boroughs has a strategic waste policy as part of their Local Plan. The boroughs’ strategic waste policies defer to the NLWP to provide a more detailed planning framework for waste development across the seven boroughs. Each borough’s Local Plan may also include site allocation documents, development management policies and area action plans, as well as supplementary planning documents.

**Figure 2: Documents making up the Development Plan for North London Boroughs**



- 1.11 In addition to the national and regional planning policies, there are also waste strategies which impact on the development of the NLWP. The Mayor’s London Environment Strategy (2018) contains recycling targets for Local Authority Collected Waste (LACW) and Commercial & Industrial (C&I) waste which inform policies within the London Plan.
- 1.12 The North London Waste Authority (NLWA) and the seven constituent boroughs have produced the Joint Municipal Waste Management Strategy (JMWMS) (2009). The NLWA, as the Waste Disposal Authority for the NLWP area, is a key stakeholder. The NLWA is responsible for managing the household waste collected by the North London boroughs, and also for the household waste deposited at Reuse and Recycling Centres and some waste that the boroughs collect from local businesses; collectively this is known as Local Authority Collected Waste (LACW). The NLWP is required to ensure there is adequate provision for the disposal and recovery of this waste stream.

**Figure 3: Hierarchy of Planning Guidance Policies and Strategies**



- 1.13 Once adopted the NLWP will form part of the overarching planning framework used for the determination of planning applications relating to proposed or existing waste facilities in North London. These applications will be submitted to the Boroughs in which the facility is located. Developers will need to consider the documents highlighted in Figure 3 in making a planning application related to an existing or proposed waste facility:
- National planning policy and guidance;
  - The London Plan and Supplementary Planning Guidance;
  - The North London Waste Plan;
  - Borough Local Plan documents

#### **What is involved in preparing the North London Waste Plan?**

- 1.14 As mentioned above, the NLWP must be prepared in line with European, national, regional and local policies and guidance. Before the NLWP can be adopted by each of the Boroughs it must be examined by an independent Inspector. The Inspector will determine whether the Plan has been prepared in accordance with the duty to co-operate, legal and procedural requirements and whether it is 'sound'.
- 1.15 The duty to co-operate, introduced by the Localism Act 2011, and requires local planning authorities and other public bodies to engage constructively, actively and on an ongoing basis to develop strategic policies. Meeting the requirements of the duty to co-operate is a key part of the plan making process for the NLWP and the North London Boroughs are working closely with other waste planning authorities that are critical for the delivery of an effective waste strategy for North London, in addition to prescribed public bodies such as the Environment Agency and the Mayor.
- 1.16 As previously highlighted, the North London Boroughs are working closely with the London Legacy Development Corporation (LLDC). The LLDC is a Mayoral Development Corporation with responsibility for securing the regeneration of an area of London focused on the former Olympic Park. The LLDC is the local planning authority, which includes waste planning, for small parts of Hackney and Waltham Forest (and other boroughs not part of the NLWP group). However, while all the Boroughs have an apportionment of waste from the Mayor under the London Plan for which they must plan and find land, the LLDC is not allocated a share of the borough apportionment. The NLWP is required therefore to plan for the quantity of waste generated across the seven boroughs including the parts of Hackney and Waltham Forest that lie within the LLDC area. In carrying out their responsibilities under the NPPW, the North London Boroughs are engaging with other planning authorities outside London which import waste from North London including the LLDC area. The NLWP cannot directly allocate sites/areas within the LLDC area as this is the responsibility of the LLDC as the local planning authority.

- 1.17 An agreement for the working relationship between the North London Boroughs and the LLDC has been drawn up. This agreement, or Memorandum of Understanding, identifies the Sites and Areas suitable for waste within the Hackney and Waltham Forest parts of the LLDC area. The LLDC's Local Plan also identifies sites and areas that are potentially suitable for waste related uses. For waste development proposals in the parts of Hackney and Waltham Forest which fall within the LLDC area, the LLDC Local Plan policies will apply. Policy IN2 of the LLDC Local Plan requires planning decisions to take full account of the policies within the adopted waste plans of the Boroughs.

### **Supporting Documents**

- 1.18 The NLWP is accompanied by evidence base documents including a Data Study, Options appraisals, Sites and Areas report and Duty to Co-operate report. There are supporting assessments such as a Sustainability Appraisal (SA) (incorporating the requirements of the SEA Directive), Habitats Regulation Assessment (HRA), a Sequential Test Report )and Equalities Impact Assessment (EqIA). These assessments form a key element of the development of the Plan and help to ensure that the social, environmental and economic impacts of the policies developed in the Plan are assessed and taken into account in the decision making process. There are also reports on the outcomes of all consultations on the NLWP. The supporting documents can be viewed -on the NLWP website.

## 2 Aims and Objectives

### Aim of the North London Waste Plan

- 2.1 Waste management has an important role in achieving sustainable development. There are a number of ways to define ‘sustainable development’. The most well-known definition is ‘*development which meets the needs of the present without compromising the ability of future generations to meet their own needs*’<sup>2</sup>. The UK Sustainable Development Strategy *Securing the Future* set out five ‘guiding principles’ of sustainable development:
- living within the planet’s environmental limits;
  - ensuring a strong, healthy and just society;
  - achieving a sustainable economy;
  - promoting good governance; and
  - using sound science responsibly.
- 2.2 The National Planning Policy Framework (NPPF) references these definitions and goes on to set out three objectives to sustainable development: economic, social and environmental. The North London Waste Plan (NLWP) will help achieve sustainable waste management by providing a sound basis for the provision of waste management infrastructure, contributing to the conservation of resources by improving the efficiency of processing and making better use of the wastes created within North London.
- 2.3 Each of the seven Borough Local Plans contains a vision for their area, and the aim of the NLWP links to the delivery of that vision. The NLWP therefore includes a single overarching aim and a number of objectives to deliver that aim. The Aim meets the requirements of National Planning Policy for Waste (NPPW) through providing a set of agreed priorities for delivering sustainable waste management in North London
- 2.4 The NLWP treats waste as a resource rather than as a nuisance, promoting the principles of the waste hierarchy. The Aim acknowledges that the NLWP is part of a wider but integrated approach that will help to deliver sustainable waste management in North London, alongside such measures as improved resource management, and waste prevention and reduction spanning strategies which

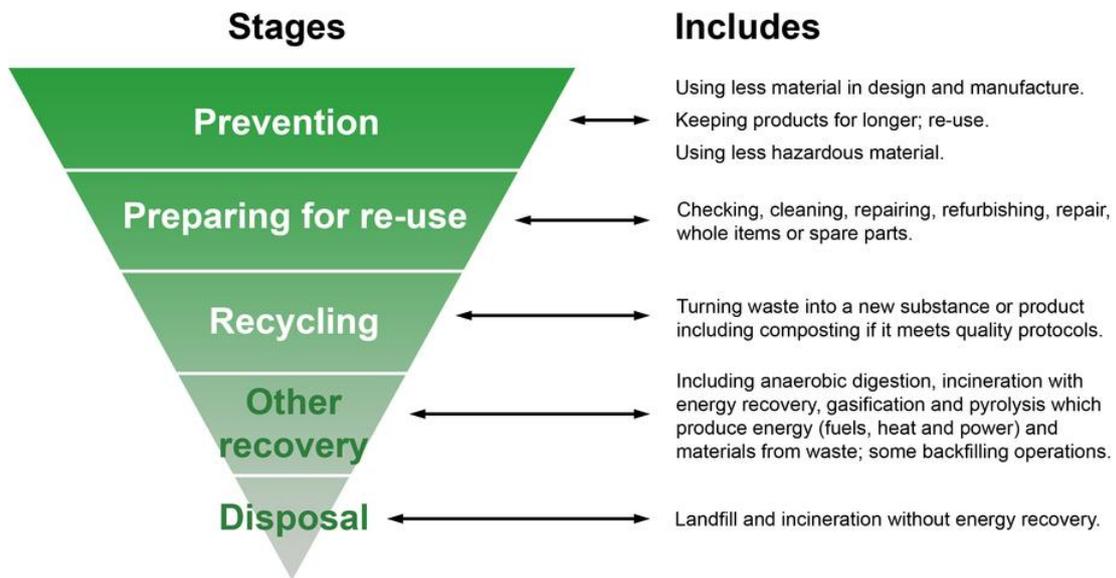
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<sup>2</sup> Brundtland Commission, 1987 (Resolution 42/187 of the United Nations General Assembly)

influence but are outside of the planning framework. The NLWP aim and objectives reference and integrate the Waste Hierarchy which is shown in Figure 4.

**Figure 4: Waste Hierarchy**

**The Waste Hierarchy**



2.5 The aim of the NLWP is:

**Aim of the NLWP**

“To achieve net self-sufficiency\* for LACW, C&I and C&D waste streams, including hazardous waste, seek beneficial use of excavation waste, and support a greener London by providing a planning framework that contributes to an integrated approach to management of materials further up the waste hierarchy. The NLWP will provide sufficient land for the sustainable development of waste facilities that are of the right type, in the right place and provided at the right time to enable the North London Boroughs to meet their identified waste management needs throughout the plan period”.

\* Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste generated in North London, while recognising that some imports and exports will continue. Equivalent capacity will be measured by the amount (tonnes) managed for each waste stream against the projected waste arisings in Table 5.

## Strategic Objectives

- 2.6 The Strategic Objectives are the steps needed to achieve the Aim of the NLWP. They are delivered through the policies in the Plan and each Strategic Objective signposts the policy or policies through which it will be met. The Strategic Objectives are as follows:

**SO1.** 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:

**Met through Policies 2, 4, 6, 7 and 8**

**SO2.** To ensure there is **sufficient suitable land** available to meet North London’s waste management needs and reduce the movements of waste through safeguarding existing sites and identifying locations for new waste facilities:

**Met through Policies 1, 2, 3, 4, , 7 and 8**

**SO3.** To plan for **net self-sufficiency** in LACW, C&I, C&D waste streams, including hazardous waste, 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, to seek beneficial use of excavation waste,, and to monitor waste exports as part of the ongoing duty to co-operate:

**Met through Policies 1, 2, 3, 4, and 8**

**SO4.** To ensure that all waste developments meet **high standards of design** and build quality, and that the construction and operation of waste management facilities do not cause unacceptable harm to the health or amenity of local residents or the environment:

**Met through Policy 5**

**SO5.** To ensure the delivery of sustainable waste development within the Plan area through the integration of **social, environmental and economic** considerations:

**Met through Policies 2, 5 and 7**

**SO6.** To provide opportunities for North London to contribute to the development of a **low carbon economy** and decentralised energy:

**Met through Policy 6**

**SO7.** To support the use of **sustainable forms of transport** and minimise the impacts of waste movements including on climate change:

**Met through Policy 5**

**SO8.** To protect and, where possible, enhance North London’s natural **environment**, biodiversity, cultural and historic environment:

**Met through Policy 5**

## Spatial Principles

### Context: Land Use in North London

- 2.7 Historically much of the employment land in North London has been in industrial use. Inevitably the restructuring from an industrial-based to a service based economy has affected land use priorities, creating a situation where the type of employment land available has changed, particularly in the inner boroughs where offices predominate. Such areas are now under pressure to help deliver high housing and employment targets. The previous use of these areas raises the risk of contamination and the need for remedial measures regardless of how the land will be used in the future.
- 2.8 Across North London as a whole the predominant land use is housing. While the outer Boroughs are characterised by traditional detached, semi-detached and terraced housing, overall across the Plan area, there is a higher proportion of flats and similar multi-tenant properties. This is particularly the case in the inner Boroughs which, consequently, have fewer gardens (and green waste) than the outer Boroughs. The differing ability of types of housing stock to incorporate waste collection infrastructure (for example recycling bins) impacts on recycling rates in North London (see section 4).
- 2.9 There are also concentrated areas of commercial activity and town centres. Parts of Camden, Hackney and Islington fall into the Central Activities Zone which covers London's geographic, economic, administrative, and cultural core spanning ten boroughs in total. The Upper Lee Valley on the east of the NLWP area includes a concentrated area of industrial activity. Each borough contains areas of industrial or employment land that are designated for this purpose. The London Plan designates Strategic Industrial Locations (SILs) and provides the strategic direction for the identification of Locally Significant Industrial Sites (LSISs) and other industrial/employment designations in Local Plans.
- 2.10 North London is one of the most densely populated areas in the UK. There are a number of drivers for change in land use in North London, in particular the need to boost housing numbers and make best and most efficient use of land around public transport modes. These pressures are likely to increase as a result of planned investment such as Crossrail 2, Stratford to Angel Road (STAR) Scheme and four-tracking on the West Anglia Mainline.
- 2.11 The Boroughs also seek to improve the health of residents and tackle deprivation. Impact on human health has been a key consideration in the development of the NLWP and is discussed in more detail in the Sustainability Appraisal (SA) which supports the NLWP. Maximising economic benefits by utilising waste as a resource is an objective of this plan. There are opportunities for job creation through the

development of new waste facilities at both the construction and end user stages. New technologies can also help to create ‘green collar’<sup>3</sup> jobs in new waste management facilities as well as in sectors that receive recycled or reprocessed material, turning it into new products, thereby creating wealth from waste.

- 2.12 To deliver this change, the London Plan has identified Opportunity Areas and Housing Action Zones in parts of North London including parts of the Lee Valley and there may be future Opportunity Areas identified during the NLWP plan period. The Opportunity Areas overlap with land which contains existing facilities and also some of the Priority Areas for new waste management facilities identified in this Plan. Therefore, it will be important for the Boroughs to monitor changing land uses through Monitoring Indicator IN4.
- 2.13 The North London Boroughs are all focused on the challenges posed by climate change. Borough strategies are driven by the requirements to mitigate and adapt to all effects of climate change. The NLWP aims to deliver effective waste and resource management which makes a positive and lasting contribution to sustainable development and to combating climate change. In particular this includes reducing the reliance on disposal to landfill sites outside London, lowering CO<sub>2</sub> emissions from road transport, ensuring new waste facilities generating energy meet the Mayor’s Carbon Intensity Floor, directing new development to the most appropriate sites and taking into account the greater occurrence of urban flood events.

### **Spatial Principles**

- 2.14 The spatial principles flow from the Plan’s Strategic Objectives and provide the strategic direction for the detailed policies of the NLWP and inform site/area selection. The principles take account of the spatial and wider policy context, the Plan’s evidence base and the views of stakeholders. The spatial principles also guide the assessment of the suitability of windfall sites under Policy 3. They reflect the complexities and realities of planning at a sub-regional level taking into account varied characteristics and functions across the seven boroughs, from densely populated urban areas to stretches of Green Belt. Competing and changing land uses, especially release of industrial land for housing, is a key issue for the boroughs.

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<sup>3</sup> Jobs in environmental sectors

- 2.15 The spatial principles set out below represent the outcome of balancing various priorities, opportunities and constraints, in particular the availability of sites/areas to achieve a deliverable distribution of waste management locations to meet identified need, whilst bringing social, economic and environmental benefits of new waste management facilities to North London.
- 2.16 The NLWP is underpinned by the following spatial principles:
- A. Make use of existing sites
  - B. Seek a better geographical spread of waste sites across North London, consistent with the principles of sustainable development.
  - C. Encourage co-location of facilities and complementary activities
  - D. Provide opportunities for decentralised heat and energy networks
  - E. Protect local amenity
  - F. Support sustainable modes of transport
- A. Make use of existing sites**
- 2.17 NPPW requires Boroughs to consider the capacity of existing operational facilities in meeting identified need. Further to this London Plan policy S18 requires boroughs, when preparing plans, to protect and facilitate the maximum use of existing waste sites.
- 2.18 In line with this and in order to recognise the valuable contribution existing waste facilities make to managing waste effectively, existing waste management capacity has provided the baseline for identifying the waste management capacity gap and the consequent need for expanded and new facilities. Existing waste management sites form an important part of the strategic waste plan for North London and are safeguarded for waste use through NLWP Policy 1 and the London Plan (see Schedule 1 in Appendix 1 for a full list of existing sites).
- 2.19 Figure 5 shows that the majority of existing waste sites are located to the east of the Plan area in the industrial parts of the Lee Valley corridor. These sites have developed over decades outside of a strategic plan for waste, and in locations which may have been suitable for waste uses but which did not create an even geographical spread across North London. This reflects the mixed function and character of the Plan area, notably in terms of significant differences among the boroughs in supply of industrial land where waste uses are generally more acceptable.
- 2.20 Three existing sites are known to be planning capacity expansion or upgrades to existing facilities (see Section 4). Most other existing sites do not have any current plans to expand capacity or change their operations but the North London Boroughs support, in principle, the expansion or intensification of operations at existing

facilities and this is reflected in Policy 1. Further guidance for industrial intensification is set out in draft New London Plan Policies E4-E7.

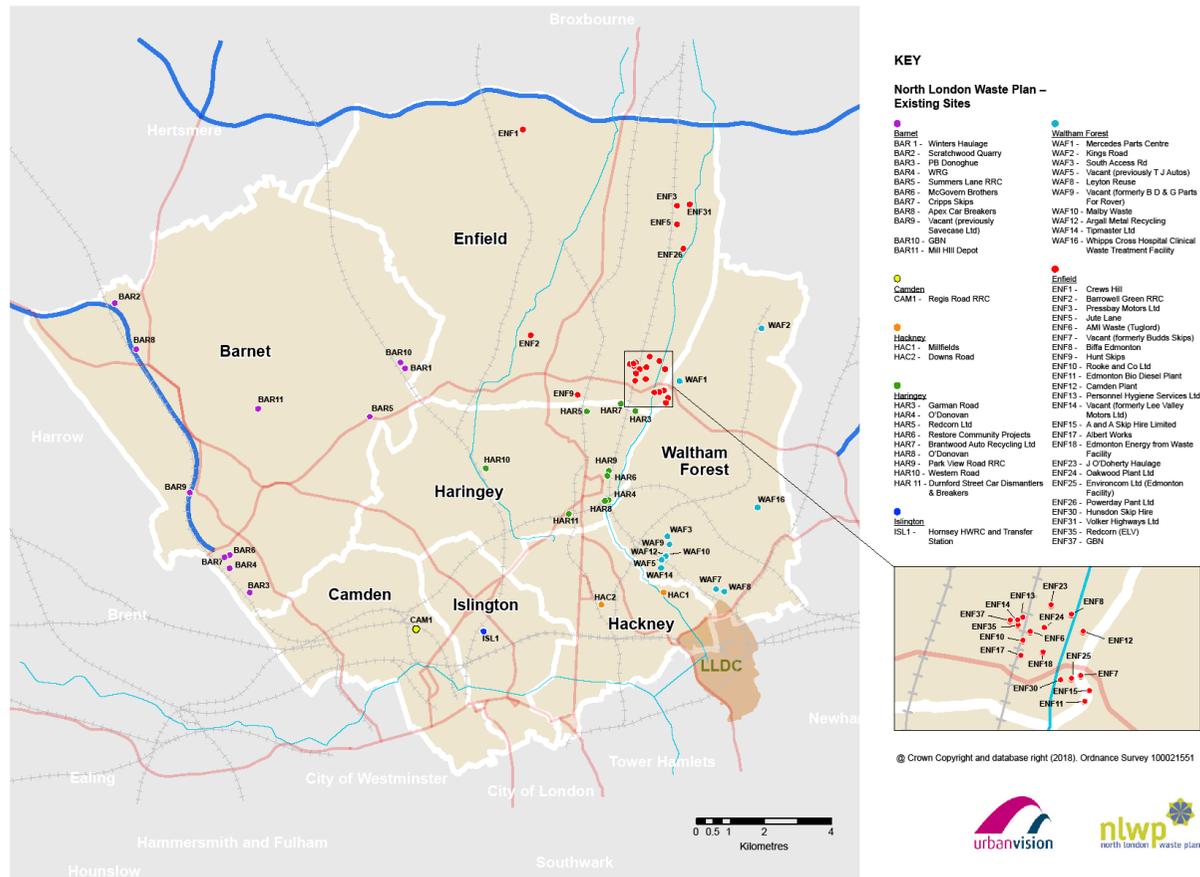
**B Seek a better geographical spread of waste sites across North London, consistent with the principles of sustainable development.**

- 2.21 The NLWP is underpinned by an aim to achieve net self-sufficiency for LACW, C&I, C&D waste streams, including hazardous waste. This will be achieved by identifying enough existing capacity and land in North London suitable for the development of new waste management facilities to manage the equivalent of 100% of this waste arising in North London. The objective is to reduce movements of waste, including waste exports, and increase the amount of waste managed in proximity to its source, in accordance with the principles of sustainable development. Waste is exported to a number of areas outside of North London, mainly in the south east and east of England. The strategy for achieving net self-sufficiency is set out in the Provision for North London's Waste to 2035 in section 6.
- 2.22 Net self-sufficiency does not mean that the North London Boroughs will deal solely with their own waste, nor promote use of the very closest facility to the exclusion of all other considerations. While it is desirable for waste to be treated as close as possible to its source in line with the proximity principle, the complexity of the waste management business poses challenges. Different types of waste require different types of management and facilities need to serve areas large enough to be economically viable. Consequently, the most suitable facility may not be the nearest and may well be outside of North London. In addition, facilities in North London will continue to manage waste from outside the area.
- 2.23 The current and changing character of each borough's industrial land is a consideration in identifying locations for new waste infrastructure. Larger and co-located facilities are more suited to areas with similar existing uses away from sensitive receptors. A future waste industry focused on resource management may derive positive cumulative impacts from a concentration of facilities. Conversely, the urban environments of NLWP boroughs are restricted by severe physical constraints limiting opportunities for some types of waste facilities. In addition, most waste facilities would be regarded as inappropriate development in the protected Green Belt in the north, will be largely out of bounds for any built waste facilities unless very special circumstances justifying the use of Green Belt land have been demonstrated. As population and densities in the plan area increase with projected growth, fewer areas away from sensitive receptors will be available. Continued development of waste facilities in areas which have, and continue to provide, significant waste capacity could have wider implications on the regeneration of the local economy. When choosing locations for future development, the benefits of co-location will need to be balanced against the cumulative impacts which can arise

from an accumulation of facilities in one location. Cumulative impacts can include traffic levels, noise and odours. There may be times when the cumulative impacts of several waste developments operating in an area would be considered unacceptable.

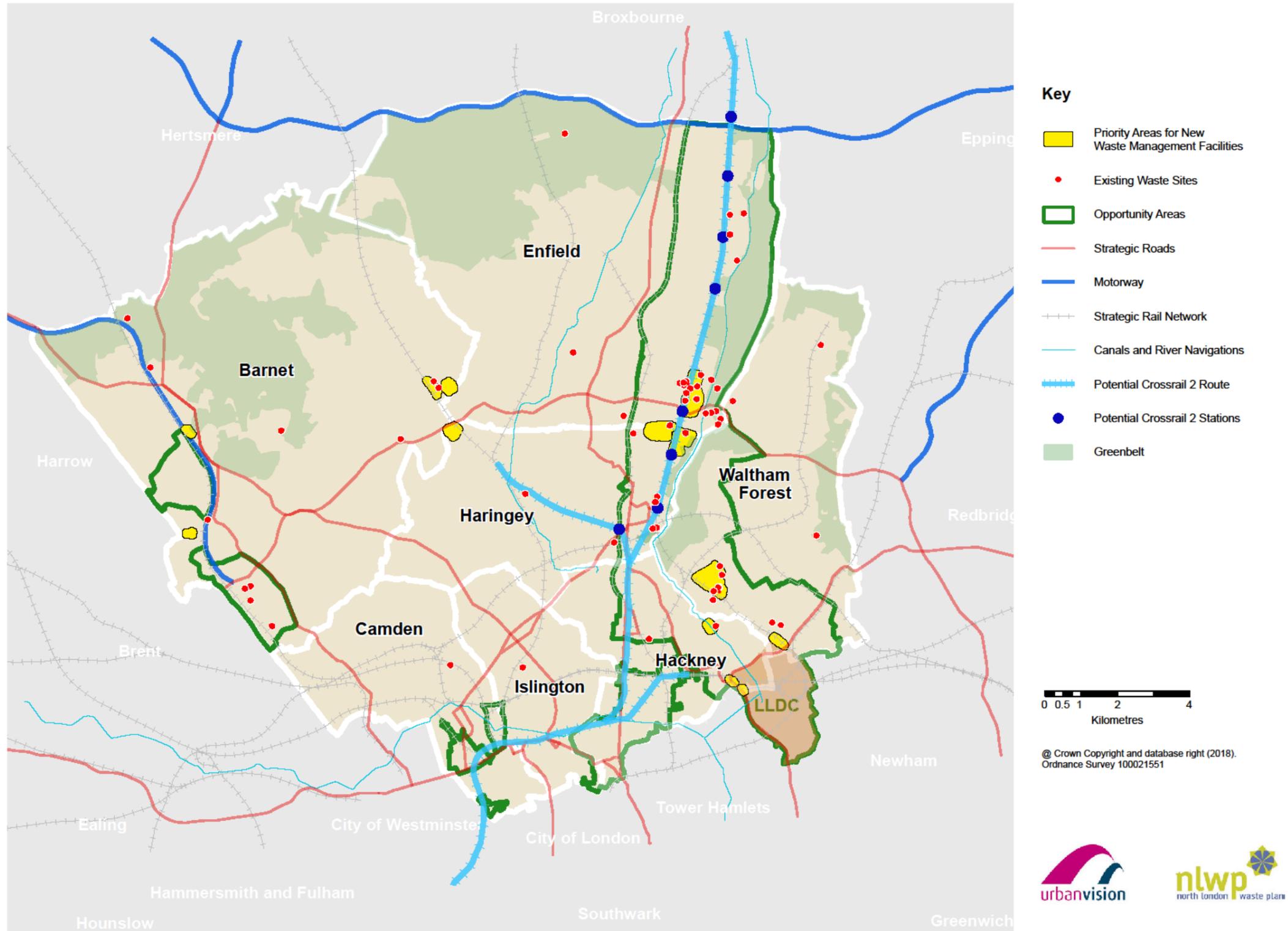
- 2.24 Figure 5 shows that there is a concentration of existing waste sites in the Lee Valley corridor, mainly in Enfield. Indeed, Enfield contributes 62% of the land currently in waste use in North London, compared to 18% in Barnet, 12% in Haringey and 5% or less in the remaining Boroughs. The NLWP has the opportunity to address concerns that there is an over-concentration of waste facilities in Enfield by promoting a better geographic spread of sites across North London and create a more sustainable pattern of waste development.
- 2.25 Any new waste development proposed in North London will be expected to be of a standard that is in keeping with and complements the existing and future planned development. By delivering STRATEGIC OBJECTIVE 2 and identifying suitable land across North London (Policy 2), the NLWP seeks to provide opportunities to manage waste as close to its source as possible, in line with the proximity principle. In promoting a geographic spread of facilities across the plan area consistent with the principles of sustainable development, the NLWP seeks to weigh the positive effects of co-location and economies of scale with the negative effects of excessive concentration of waste facilities in any one area. All North London Boroughs want to play their part in managing north London's waste and therefore support a more equitable geographical distribution across the seven Boroughs.
- 2.26 While all industrial land in North London is suitable 'in principle' for waste uses, there are certain locations which are more suitable than others to provide the waste capacity needed. Section 5 of the NLWP sets out how 'Priority Areas' for new waste facilities in North London were identified. One of the considerations was creating a better geographical spread, and this has been achieved by limiting the number of Priority Areas within Enfield. The NLWP takes an area-based approach to waste planning and identifies certain industrial and employment areas as in principle more suitable for waste use but where the land is not specifically safeguarded for waste. The area-based approach allows for flexibility in bringing forward a range of locations across North London which is combined with policy to promote areas outside Enfield first (see Policy 2). This is supported by annual monitoring to check that land for waste capacity is being taken up as anticipated (see Section 8 monitoring indicator IN3). In addition the NLWP supports the intensification of existing waste facilities where appropriate to optimise their throughput (see Policy 1).

Figure 5: Existing Waste Sites



- 2.27 In combination, existing waste sites and the 'Priority Areas' are considered a sustainable network of waste facilities because they present sufficient opportunity to meet North London's waste capacity needs and net self-sufficiency targets while promoting a better geographical spread. They will help reduce movements of waste, including waste exports and increase opportunities for waste to be managed in proximity to its source. New waste facilities will be directed towards the most suitable land in North London when assessed against the planning criteria (see Table 10) as well as the character of different areas, changing land uses and availability of suitable industrial land. Policy 2 identifies these Priority Areas in Schedules 2 and 3. Outside of the Priority Areas, where demand arises, opportunities to improve the spread of waste sites across the area are supported through Policy 3: Windfall Sites where they adhere to the site assessment criteria set out in section 5.
- 2.28 With local re-use and recycling centres (RRC) it is especially desirable to have a geographical spread that enables good access to residents. RRCs are facilities to which the public can bring household waste for free. Figure 7 shows the current network of local RRCs and a radius of two miles around them. Gaps in coverage have been identified by the NLWA in parts of the Plan area, namely Barnet and Enfield, shown outside of the two mile radius around each RRC. Any new RRC facilities will be assessed against Policy 4: Re-use and Recycling Centres.

Figure 6: Key diagram



### C. Encourage co-location of facilities and complementary activities

- 2.29 NPPW requires waste plans to identify opportunities to co-locate facilities together and with complementary activities, including end users of waste outputs such as users of fuel, low carbon energy/heat and recyclable wastes. These opportunities are also associated with a move towards a more circular economy. WRAP defines the Circular Economy as *an alternative to a traditional linear economy (make, use, dispose) in which we keep resources in use for as long as possible, extract the maximum value from them whilst in use, then recover and regenerate products and materials at the end of each service life*<sup>4</sup>. The European Commission has published its Circular Economy package<sup>5</sup>, while in London the London Waste and Recycling Board has published a Circular Economy route map<sup>6</sup>.
- 2.30 There are several benefits of co-location of facilities. Co-location has the potential to minimise environmental impacts, take advantage of ‘economies of scale’, share infrastructure, existing networks (e.g. the rail and highway network) and skilled workforces. The concentration of waste facilities in the Lee Valley corridor provides the most promising opportunities for co-location with existing facilities. Notwithstanding this, NPPW requires the Plan to take account of the cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community.
- 2.31 There are also co-location opportunities related to other industrial activities synergistic with waste management, for example the manufacturing of products from recycled materials and the development of a more circular economy. Existing waste facilities are already employing this approach as exemplified by the industries developing around the Edmonton EcoPark (Enfield) and the Plan seeks to build on the momentum by supporting this approach as a key element of the spatial principles and identifying which areas have potential for co-location. Co-location of industrial and non-industrial uses at Strategic Industrial Locations (SIL) is not supported, in line with draft New London Plan policy E5.
- 2.32 Opportunity Areas, Housing Zones and the route of Crossrail 2 could also be factors when considering co-location of facilities. These schemes are likely to intensify

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<sup>4</sup> <http://www.wrap.org.uk/content/wrap-and-circular-economy>

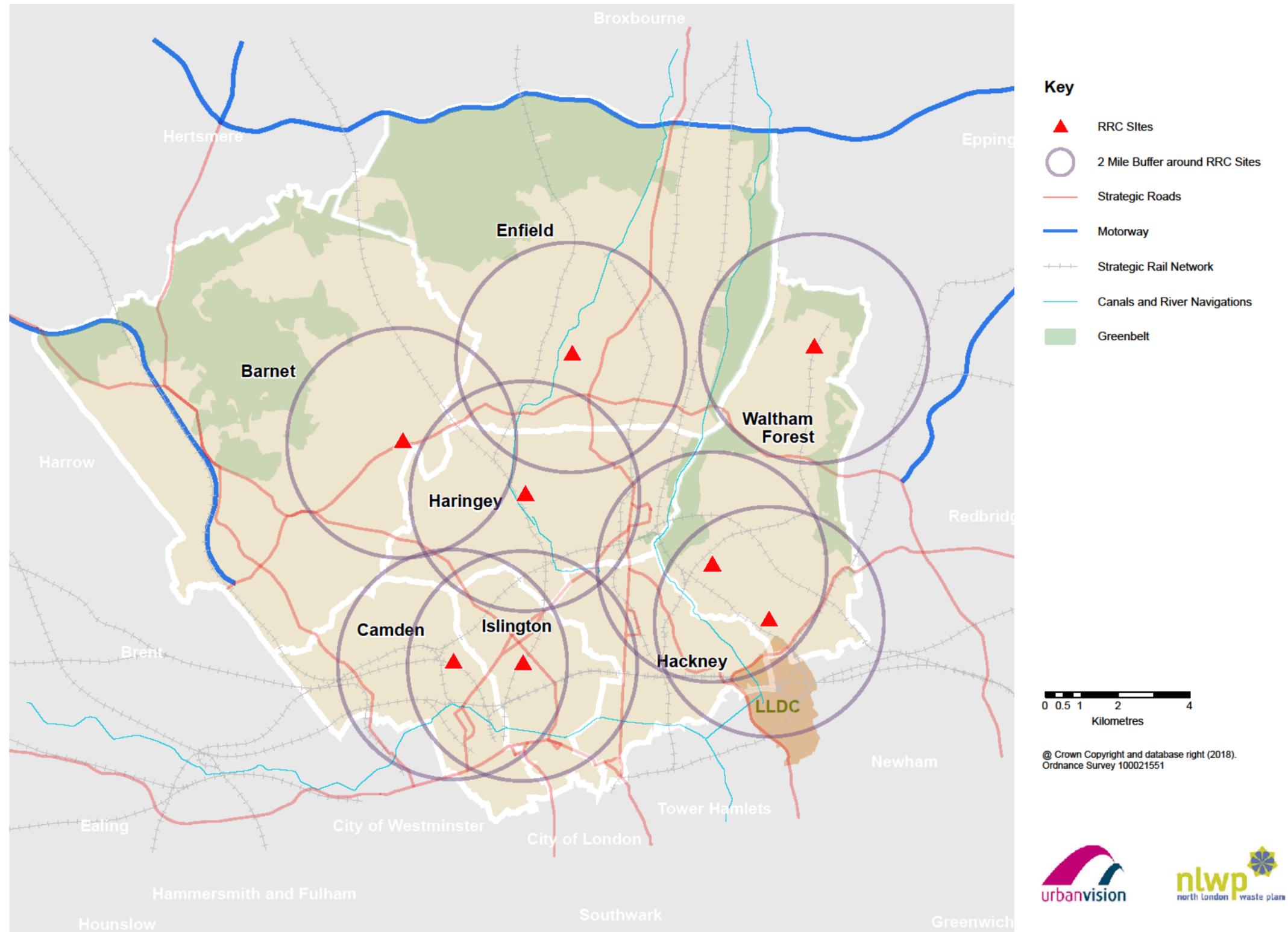
<sup>5</sup> Circular Economy Package [http://ec.europa.eu/environment/circular-economy/index\\_en.htm](http://ec.europa.eu/environment/circular-economy/index_en.htm)

<sup>6</sup> <https://www.lwarb.gov.uk/what-we-do/circular-london/circular-economy-route-map/>

development, especially near to stations, and there are both resulting opportunities and threats for existing waste facilities and land identified as suitable for waste uses. The opportunities include waste facilities supplying energy to new developments and new waste facilities being incorporated into the schemes, for example an anaerobic digestion facility to deal with household food waste, and consolidation or relocation of waste uses. Risks include new uses displacing waste facilities due to incompatibility or impacts of construction. Protection for waste capacity through safeguarding, the agent of change principle and re-provision policies in the London Plan, Local Plans and NLWP Policy 1 will be a key policy tool under these circumstances.

- 2.33 Co-location of facilities with complementary activities will be encouraged through Policy 2, which directs new waste uses to Priority Areas and provides a spatial focus towards land with similar existing uses away from sensitive receptors. Policy 3: Windfall Sites allows for opportunities of locating recycling facilities near to a reprocessing plant that could use the recyclate material. Policy 5 requires developers to consider the possible benefits of co-locating waste development as well as any potential cumulative impacts.

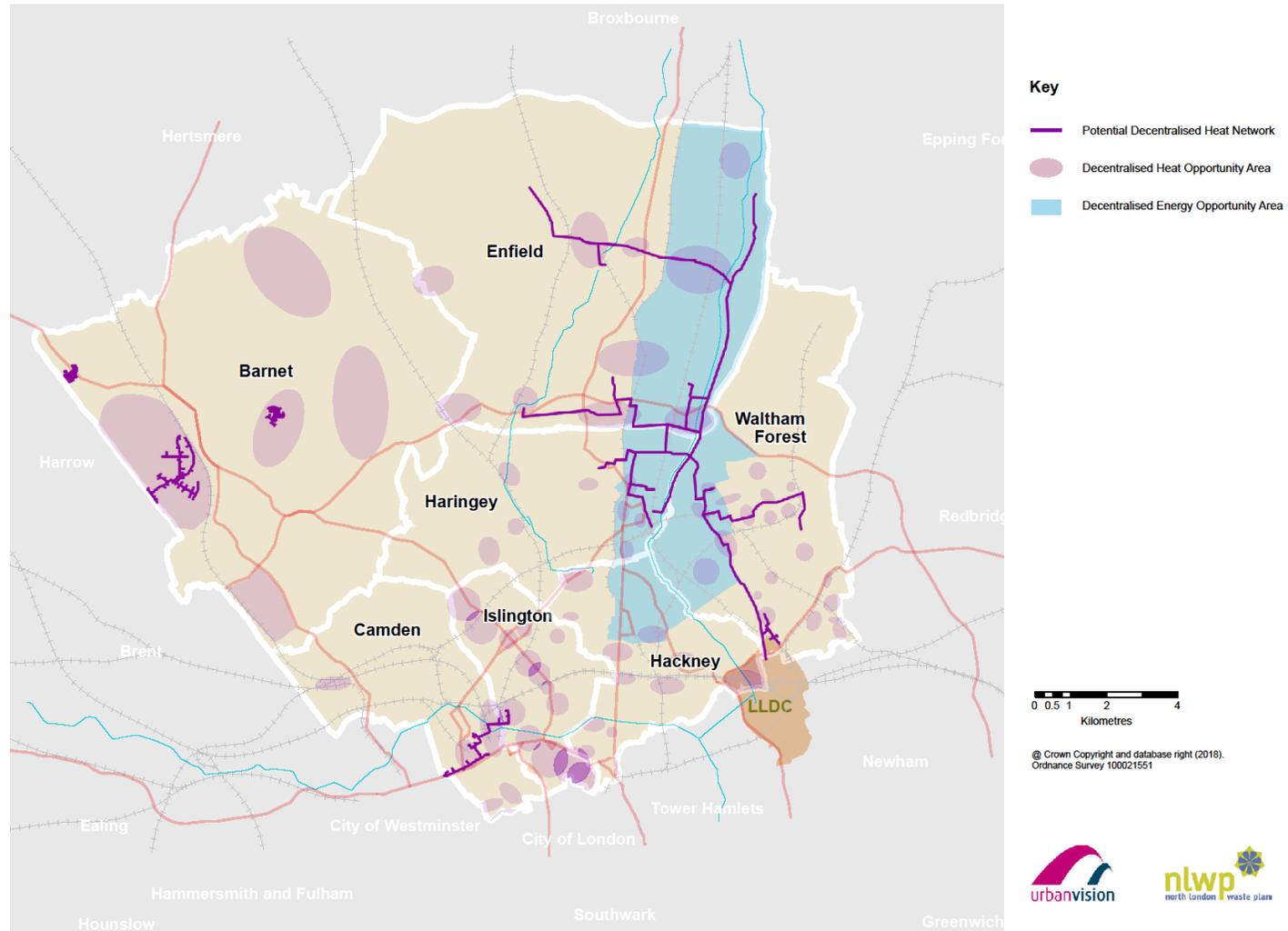
Figure 7: Current Re-use and Recycling Centres (RRC) in North London [revised]



**D. Provide opportunities for decentralised heat and energy networks**

- 2.34 The NPPW recognises the benefits of co-location of waste facilities with end users of their energy outputs. The London Plan Policy S18 encourages proposals for materials and waste management sites where they contribute towards renewable energy generation and/or are linked to low emission combined heat and power and/or combined cooling heat and power (CHP is only acceptable where it will enable the delivery or extension of an area-wide heat network consistent with Policy S13 Part D1e). The same policy requires facilities generating energy from waste to meet, or to demonstrate that steps are in place to meet in the near future, a minimum performance of 400g of CO<sub>2</sub> equivalent per kilowatt hour of electricity produced.
- 2.35 The Heat and Energy Network Diagram (Figure 8) shows where facilities could connect to a network ('decentralised heat opportunity area' and 'decentralised energy opportunity area'). There is already a relatively well-advanced plan for decentralised heat network in the Lee Valley and this offers the most promising and realistic possibility within the Plan area. The NLWP supports opportunities to develop combined heat and power networks on sites and areas, within the Lee Valley, south Barnet and elsewhere that not only have the ability to link in to the decentralised energy network but also have the potential for waste development with Combined Heat and Power. Policy 6 seeks to secure opportunities for the recovery of energy from waste where feasible.

Figure 8: Heat and Energy Networks in North London



## **E. Protect local amenity**

- 2.36 The North London Waste Plan area includes important green space with many parks and larger areas such as Hampstead Heath, the Lee Valley Regional Park and part of Epping Forest. There are extensive areas of Green Belt in the outer areas and areas of agricultural land in Barnet and Enfield.
- 2.37 Enfield has 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.
- 2.38 The Lee Valley contains an internationally important wetland habitat (Ramsar site and Special Protection Area (SPA)) as the reservoirs and old gravel pits support internationally important numbers of wintering birds as well as other nationally important species. In addition, the adjacent Epping Forest Special Area of Conservation (SAC), part of which lies in Waltham Forest, is important for a range of rare species, including mosses. There are six Sites of Special Scientific Interest (SSSI), 21 Local Nature Reserves and 307 Sites of Importance for Nature Conservation (SINC). The concentration of industrial land in the Lee Valley poses challenges for development to take into account key biodiversity issues set out in Borough Biodiversity Action Plans.
- 2.39 Throughout North London there are many areas and sites of historic interest including 172 conservation areas, over 14,000 listed buildings, registered landscapes, scheduled monuments, archaeological priority areas and as yet unknown archaeological remains. Protection for heritage assets is included in Local Plan policies and the sites/areas assessment criteria (see section 5) and policy 5.
- 2.40 The heavily developed and built up nature of North London coupled with differential values between competing land uses, and protected areas such as Green Belt presents a significant challenge in planning for waste. Expected development over the plan period will increase these pressures. For development which is perceived as likely to create more environmental risk and harm to the amenity of the local area, through factors such as noise, dust and increased traffic, the planning constraints near areas protected for their environmental value are greater.
- 2.41 Protection of groundwater is vital to prevent pollution of supplies of drinking water, while secondary aquifers are important in providing base flows to rivers. The Environment Agency has designated areas of source protection zones in a number of locations, particularly in the Lee Valley as well as implementing groundwater protection measures around boreholes in the area.

- 2.42 The protection of amenity is a well-established principle in the planning system. The NPPW requires the Boroughs to consider the likely impact on the local environment and on amenity when considering planning applications for waste facilities. Amenity includes aural (noise) and visual amenity such as open space, flora, and the characteristics of the locality including historic and architectural assets. Negative amenity impacts also include odour arising from the processing and type of waste being managed.
- 2.43 The site selection criteria set out in section 5 effectively direct waste management development to the most suitable sites/areas taking into account environmental and physical constraints, including locations where potential amenity impacts can be mitigated to an acceptable degree as well as considering cumulative impacts of additional waste facilities in already well developed areas and areas with a history of waste development. All proposed Areas have been subject to assessment in the Sustainability Appraisal and the Habitats Regulation Assessment and the findings fed into the policy recommendations
- 2.44 The protection of local amenity has been considered during the assessment of sites/areas to identify those suitable for inclusion in the NLWP. Policy 5 sets out assessment criteria for waste management facilities and deals with protection of local amenity including information requirements to support applications for waste facilities. The policy's presumption for enclosed as opposed to open air facilities is also important to the application of this principle in terms of air quality and protecting the health of residents.
- 2.45 As outlined within Policy 1, proposals for expansion or intensification of existing waste uses should not unacceptably harm the amenity of occupiers of any existing developments. The onus will be upon the developer of the new proposed development to ensure appropriate mitigation measures are put in place under the agent of change principle.
- 2.46 Policy 3 seeks to ensure that proposals for waste management facilities do not constrain areas undergoing development change, such as new transport or economic regeneration initiatives.

**F. Support sustainable modes of transport**

- 2.47 North London benefits from good access to the strategic road network such as the M1 and M11 and the M25. The local road network is dominated by important radial routes to the centre of London and also includes the key orbital North Circular Road (A406) which bisects the Plan area from east to west. Parts of this network experience high levels of congestion at off-peak as well as peak hours, despite the fact that part of the area lies within the London Mayor's congestion charging zone.

- 2.48 Air quality within North London is uniformly poor as a result of high levels of nitrogen dioxide and dust (NO<sub>2</sub> and PM<sub>10</sub> respectively) that are mainly, but not exclusively, due to road traffic. As a result, all of the councils have declared Air Quality Management Areas (AQMA) covering each Borough.
- 2.49 Three main train lines terminate at Euston, St Pancras and Kings Cross, all in Camden. The North London Line (NLL) is a commuter and nationally important freight route providing movement of material across the area. There is a planning application to replace the railhead at Hendon in Barnet that currently transports waste out of London by a new facility just to its north. Proposals for the West London Orbital line will improve rail access to the west of the area.
- 2.50 In March 2016, the National Infrastructure Commission recommended that Crossrail 2, a proposed new rail line serving six of the NLWP constituent Boroughs, should be taken forward as a priority. Transport for London and Network Rail are currently developing the scheme. Whilst the final scheme and timetable is not yet known, there is a potential for Crossrail 2 to impact upon existing or future waste management sites during the NLWP period. This is discussed further in Section 5.
- 2.51 In addition the Grand Union Canal and the Lee Navigation run through the area and provide sufficient draught to allow light cargo movements to and from industrial and other facilities close to a number of wharves along each waterway.
- 2.52 The NPPW and the London Plan require Boroughs to identify sites/areas with the potential to utilise modes of transport other than road transport. As Figure 6 shows, North London is well served by road, rail and waterway networks and waste is currently transported into, out of and around North London by both road and rail. But like many industry sectors, road is the main mode of transport for the movement of waste. There are potential opportunities for waste sites to better utilise sustainable modes of transport such as rail and waterways. Movement of waste via more sustainable transport methods is duly supported in line with STRATEGIC OBJECTIVE 7, although this may not always be practicable, especially when costs associated with investment in wharfs and rail sidings and other infrastructure which may be necessary before waste can be moved along the canal or rail network may not be economically viable, especially for smaller facilities. North London currently has one rail linked waste site (at Hendon) supporting the requirements of the NLWA, however this site is due to be redeveloped as part of the Brent Cross Cricklewood regeneration project and the NLWA's need for this railhead has changed. This is reflected in a new replacement waste transfer station (approved by Barnet Council in September 2018). A replacement rail based freight facility has also been approved as part of the Brent Cross Cricklewood regeneration scheme under planning permission 17/5761/EIA, which permits the transfer of aggregate and non-putrescible construction waste by rail. This rail transfer facility was brought into operation in

March 2020. There is also a wharf on the Lee Navigation which potentially could provide future opportunities for transportation by water at Edmonton EcoPark.

- 2.53 Road transport will continue to be the principal method of transporting waste in North London, particularly over shorter distances where this is more flexible and cost effective. The efficient use of transport networks combined with good logistics and operational practices can make a significant contribution towards the level of transport sustainability achieved. The transportation of waste as well as other traffic movements to and from sites can impact on amenity along the routes used. Policy 5 will seek to minimise such impacts where possible, for example through the use of ultra-low and zero emission vehicles. Access to transport networks including sustainable transport modes was considered when assessing the suitability of new sites and areas. Rail and water transport is particularly desirable when waste is travelling long distances. Policy 5 considers sustainable transport modes in planning decisions.

### 3 Current waste management in North London

3.1 This section looks at the current picture of waste management in North London, including the amount of waste generated, how and where it is currently managed; future waste arisings; the current existing capacity, types and location of facilities; capacity gaps; and how North London's waste will be managed over the plan period. how each waste stream is managed, key targets and cross-boundary movements of waste.

#### North London Waste Data Study

3.2 The Waste Data Study was first prepared in July 2014 and updated in July 2015 to inform the Draft NLWP. A further update in 2019 accompanied the Proposed Submission Plan. All versions of the Data Study are available to view on NLWP website ([www.nlwp.net](http://www.nlwp.net)). The Waste Data Study is in three parts as shown below, with the date of the most recent version provided in brackets:

- Part One: North London Waste Arisings (2019)
- Part Two: North London Waste Capacity (2019)
- Part Three: North London Sites Schedule (2019)

#### Waste generated in North London

3.3 Table 2 below shows the amount of waste generated in North London for the main waste streams using the latest data from 2016. Waste arisings vary from year to year and these figures represent a snapshot in time. Figure 9 shows the proportion of each waste stream as a percentage of the total waste in North London<sup>7</sup>.

3.4 New A Data Study Addendum (2020) was prepared to support the Main Modifications to the NLWP. The Data Study Addendum proposes modifications to the way data is presented in the NLWP so that the reader can more readily follow the line of justification and reasoning behind the approach to waste management in North London.

3.5 Table 2 below shows the amount of waste generated in North London for the main waste streams using baseline data from 2016. Waste arisings vary from year to year

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<sup>7</sup> The data is taken from the Waste Data Study (2019)

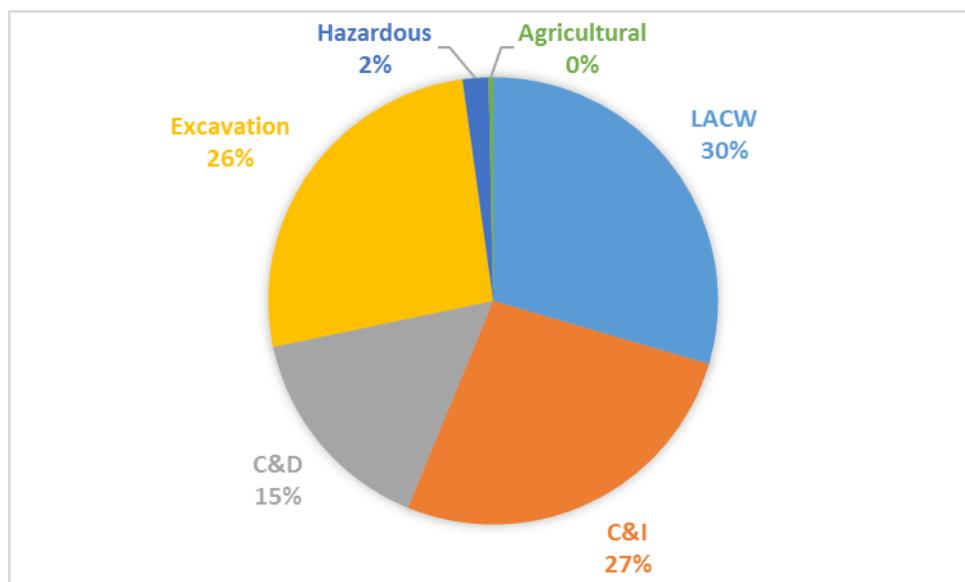
and these figures represent a snapshot in time. Figure 9 shows the proportion of each waste stream as a percentage of the total waste in North London<sup>8</sup>.

**Table 1: Amount of Waste Generated in North London, 2016**

Local Authority Collected Waste (LACW)	845,776
Commercial and Industrial Waste (C&I)	762,301
Construction and Demolition Waste (C&D)	443,180
Agricultural Waste	9,223
Hazardous waste	53,420
Excavation Waste	747,242
<b>TOTAL</b>	<b>2,861,062</b>

Source: North London Waste Data Study Update 2016

**Figure 9: Waste arisings in North London 2016**



Source: North London Waste Data Study 2019

<sup>8</sup> The data is taken from the Waste Data Study (2019)

### How North London's waste is currently managed

3.6 New Around 66% of waste generated in North London is managed in North London, excluding excavation waste. The amounts of North London's waste managed within North London and elsewhere is set out in Table 2. This section sets out how and where each waste stream is currently managed.

**Table 2: The amount of North London's waste managed in North London and elsewhere (2016)**

Waste stream	Waste arising	Amount managed in North London	Amount managed elsewhere in London	Amount exported to landfill outside London	Amount exported to other facilities outside London
LACW	845,776	718,900	1,000	68,900	56,900
C&I	762,301	402,900	34,600	251,600	73,000
C&D	443,180	248,000	108,225	30,200	31,000
Hazardous (HWDI)	53,420	313	12,663	8,557	31,887
<b>Proportion</b>		66%	7.5%	17%	9%
Excavation	747,242	52,523	335,862	265,415	82,463
<b>Proportion</b>		7%	45%	35.5%	11%

Source: Waste Data Interrogator (WDI) and Hazardous Waste Data Interrogator (HWDI)

### Local Authority Collected Waste

- 3.7 The data for this waste stream is the most reliable. Local Authority Collected Waste (LACW) is reported annually by the North London Waste Authority (NLWA) and data from all waste authorities are published by government along with statistics. In North London, around 845,700 tonnes of LACW was collected in 2016/17<sup>9</sup>. Of this, approximately 224,500(27%) was recycled, reused or composted, below the 30% London average. Of the remaining LACW, 541,300 (64%) was sent to NLWA's energy-from-waste facility at Edmonton (above the London average of 60%) and 68,900 (8%) was sent to landfill outside of North London (below the London average of 12.5%). For household waste only the recycling rate was 32% which is just below the London average of 33%.
- 3.8 The NLWA has reported an increase in recycling performance for household waste from 23% in 2006/7 to 32% by 2016/17. The percentage of waste going to landfill fell from 36% in 2006/07 to 8% in 2016/17. There are a number of factors which contribute towards lower recycling rates in London than the country as a whole. These include: rapid population growth; a greater transient population than anywhere else in the UK; the greater proportion of flats compared to houses which presents challenges for setting up collection systems for recyclable waste; and proportionately fewer gardens generating lower level of green waste for recycling.

### Commercial and Industrial Waste

- 3.9 The Waste Data Study has used two methods to identify C&I waste arisings. The first is to use data from the Defra C&I Waste Survey 2009 in line with the London Plan to assess the management routes of North London's C&I waste. The second is to use the method based on published data from the Environment Agency's Waste Data Interrogator (WDI), introduced in 2014<sup>10</sup>. The Boroughs have used the 2014 'WDI methodology' for this plan. This method of calculation indicates that around 760,000 tonnes of C&I waste was generated in North London in 2016. Of this, 335,400 tonnes (44%) of C&I waste was recycled, reused or composted while 251,600 tonnes (33%) of this waste stream was sent to landfill and land recovery.

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<sup>9</sup> Figures from the [NLWA Annual Monitoring Report 2016-17](#) and [ENV18 - Local authority collected waste: annual results tables](#)

<sup>10</sup> [New Methodology to Estimate Waste Generation by the Commercial and Industrial Sector in England, DEFRA August 2014](#)

Around 29,600 tonnes (17%) was sent for thermal treatment with energy recovery and a small proportion (6%) of C&I was sent for non-thermal treatment. A high proportion of this waste (around 43%) is currently exported from London. .

### **Construction, Demolition and Excavation Waste**

3.10 Local planning policies and development industry practice mean a lot of C&D material is managed on site and does not enter the waste stream. A total of 443,180 tonnes of C&D waste and 747,243 tonnes of excavation waste was produced in North London in 2016. The largest proportion of C&D waste arising in North London is managed via recycling (73%) and treatment (20%) facilities, with 7% sent directly to landfill. Recycling rates of C&D waste are high due to the nature and value of the material and most of this takes place in North London or elsewhere in London. Excavation materials are primarily disposed of outside North London directly to landfill (53%) with the remainder managed through transfer stations (28%) or sent for treatment (19%).

### **Hazardous Waste**

3.11 A total of 53,420 tonnes of hazardous waste was produced in 2016, of this waste 40% was managed at treatment facilities, of which the majority was exported for treatment outside of North London. The next most common method of management was recovery (20%), with a further 16% being managed at landfill. Of the total hazardous waste arisings, 53,107 tonnes (99.4%) of waste was exported out of North London for management. It is not unusual for hazardous waste to travel outside the area to specialist facilities which tend to have a wider catchment area.

### **Agricultural Waste**

3.12 A total of 9,223 tonnes of Agricultural waste was produced in 2016, with only 125 tonnes being identified as being managed off site. The majority of agricultural waste arisings are managed within the limited number of farm holdings within the Plan area, with a very small amount managed offsite through commercial waste facilities. As such, the NLWP does not seek to identify sites for additional facilities to manage this waste stream; any facilities which do come forward on farm land would be considered against Policy 3 'Windfall sites'.

### **Low Level Non-Nuclear Radioactive Waste**

3.13 The very small amount of Low Level Non-Nuclear Radioactive Waste (LLW) arising in North London, mainly from hospitals, is currently managed outside of the area in specialist facilities. Records of LLW in the sub-region indicate that there are currently 16 sites producing LLW as waste water, with a number of the amounts

generated being below the reporting threshold, which is measured in terms of radioactivity.

### **Waste Water and Sewage Sludge**

- 3.14 Waste Water Treatment Works in North London are operated by Thames Water. The main Thames Water Waste Water/sewage treatment facility in North London is Deephams Sewage Treatment Works (STW), which is the ninth largest in England. The site is to be retained and improved for waste water use and planning permission has been granted for an upgrade to the effluent treatment stream. Thames Water anticipates that the recently constructed upgrade to Deephams STW will provide sufficient effluent treatment capacity to meet their needs into the next decade. However, this will be reviewed in future AMP periods to ensure ongoing capacity in relation to population growth. Further details can be found in section 4.

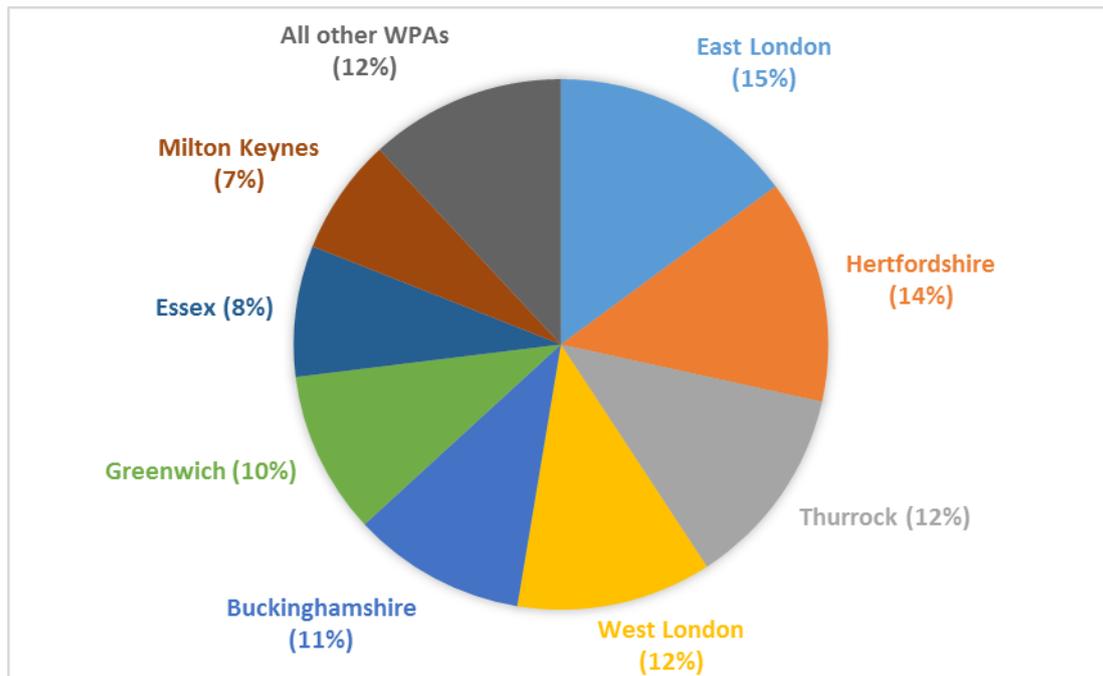
### **Cross Boundary Movements (exports and imports)**

- 3.15 North London does not have all the types of facilities necessary to manage all the sub-types of waste arising within the main waste streams shown in Table 2. For example, there are few specialist hazardous waste facilities and no landfill sites in North London and so waste which requires these types of facilities will continue to be exported. Exports of waste arising in North London will need to be balanced out by an equivalent amount of additional capacity within North London.
- 3.16 Some of this capacity will be provided by existing facilities which import waste from outside North London. In 2016, around 1 million tonnes of waste was imported in to North London. Most of the imported waste comes from immediate neighbours in Greater London, the South East and East of England and is managed in transfer stations, treatment facilities and metal recycling sites. The type of facilities in North London with a wider-than-local catchment area include recycling and treatment facilities, in particular metal recycling and end of life vehicle (ELV) facilities as well as facilities for the processing of CDE into recycled aggregate products for resale. Waste will continue to be imported into North London over the plan period in line with market demands.
- 3.17 In 2016, around 1.4 million tonnes of waste was recorded as exported from North London, 675,788 tonnes of which went to landfill. Most of the waste deposited to landfill was excavation waste (65%) followed by LACW/C&I (35%). Exports of LACW to landfill have been steadily declining in recent years, in line with the waste strategies of the London Mayor and the North London Waste Authority which aim to reduce the amount of waste going to landfill. Data for hazardous waste exports to landfill is shown from both the Waste Data Interrogator (WDI) and the Hazardous Waste data Interrogator (HWDI). The HWDI is the more accurate of the two for

hazardous waste, but the total exports to landfill figure is taken from the WDI only. Exports of CD&E waste generally follow patterns of waste arising, so when more CD&E waste is generated, more is exported.

- 3.18 Local planning authorities have a duty to cooperate with each other on strategic matters that cross administrative boundaries. Exports of waste from one waste planning authority to another is a strategic cross-boundary matter and is an important consideration in assessing the effectiveness of the NLWP. It is therefore important to understand the destination of North London's waste exports and to understand any issues which could prevent similar amounts of waste being exported in the future.
- 3.19 Although North London is planning for capacity to meet the equivalent of 100% of its waste arisings, North London has no landfill sites and is not planning to open any landfill sites. This means that waste arising in London which cannot be recycled or recovered and can only be disposed of to landfill will continue to do so. Table 5 identifies the amount of waste which is expected to be disposed of to landfill over the plan period and this will form part of the annual monitoring to ensure that duty to co-operate engagement takes place if there are significant changes from current and anticipated waste exports to landfill.
- 3.20 It should be noted that exports from and imports into North London are not a measure of North London's net self-sufficiency. Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste need in North London, while recognising that some imports and exports will continue. For most waste streams, the market dictates where the waste is managed, however the more capacity there is within North London, the more opportunity for North London's waste to be managed within its own boundaries.
- 3.21 During 2013-2016 waste exports from North London were deposited in more than 70 different waste planning authority areas but the majority (88%) went to eight main destinations. These are shown in the Figure 10 below:

**Figure10: Destinations of Waste Exports from North London**



Source: WDI 2013-2016

- 3.22 As part of discharging the ‘duty to co-operate’, the North London Boroughs have contacted all waste planning authorities (WPA) who receive waste from North London to identify any issues which may prevent waste movements continuing during the plan period. A Report on the duty to co-operate, issues identified and next stages accompanies this Plan and is available on the NLWP website.
- 3.23 In particular, the North London Boroughs have engaged with each of the main recipients of North London’s waste to landfill and identified if there are planning reasons why similar exports of waste cannot continue over the plan period, for example the planned closure of a site. . .
- 3.24 Engagement to date has identified a constraint to the continuation of waste exports to landfill from North London relating to the scheduled closure of some landfill sites during the plan period, though the operation of some of these sites may be extended beyond their currently permitted end date. This work is set out in the Duty to Co-operate Report.
- 3.25 It is recognised that non-hazardous landfill capacity in the wider south east is declining and no new non-hazardous landfill sites are being put forward by waste operators. A small number of new inert waste sites are being put forward in former mineral works. The lack of landfill capacity in the wider south east is an issue for all WPAs preparing plans and there is a continuing need to plan to manage waste

further up the waste hierarchy to help reduce the need for landfill capacity. The destination of waste is largely dependent on market forces and therefore it is not possible to identify specific alternative destinations where North London's waste will go after the closure of landfill sites during the plan period. The North London Boroughs have established that there is opportunity for the market to find alternative destinations in the wider south east for any of North London's 'homeless' waste in the short term. In the longer term, beneficial use of excavation waste and the Circular Economy Statements will assist the North London Boroughs to reduce exports of waste to landfill and monitor the destinations of waste exports.

- 3.26 A further constraint for the continued export of waste has been identified with regard to hazardous waste, namely a lack of detailed data on where it ends up. This type of waste is managed in specialist facilities which have wide catchment areas and therefore may not be local to the source of the waste. North London has hazardous waste capacity of around 4,250 tonnes per annum, mainly for end of life vehicles. The treatment facilities handle a small proportion of North London's hazardous waste (around 8%) while the rest (92%) is exported.
- 3.27 While the export of the majority of hazardous waste to the most appropriate specialist facilities is likely to continue, current data collection methods do not identify the hazardous waste facilities in question. No planning issues have been identified which will prevent North London's hazardous waste continuing to be managed at specialist hazardous facilities in any of the areas which receive significant amounts of hazardous waste exports from North London.
- 3.28 The boroughs will continue to monitor hazardous waste exports from North London and engage with waste planning authorities who receive strategic amounts of North London's waste when and if there are any substantial changes which may affect waste planning in their area.

## 4 Future Waste Management Requirements

### Context

- 4.1 In line with the NPPW and the London Plan, the NLWP must identify sufficient waste management capacity to meet the identified waste management needs of North London over the plan period.
- 4.2 It follows that a key part of the development of the NLWP is to identify how much waste will be produced during the plan period, how this will be managed, what capacity is required and whether there is sufficient capacity already available. The NLWP must also consider how changes in the waste management behaviours, practices and technologies may influence this.

### Targets for North London's waste management

- 4.3 The North London Boroughs have statutory duties to meet recycling and recovery targets and the NLWP will need to be ambitious in order to achieve European Union, national, regional and local targets. These targets taken from the London Plan (March 2021) are as follows:

**Table 3: Recycling and Recovery Targets with 2016 Baseline**

Waste stream	Target	2016 baseline
LACW	Contributing towards 65% recycling of municipal waste by 2030	27%
C&I	Contributing towards 65% recycling of municipal waste by 2030	44%
C&D	95% reuse/recycling/recovery	93%
Excavation	95% beneficial use	Not known
Biodegradable or recyclable waste	Zero biodegradable or recyclable waste to landfill by 2026	Not known
Hazardous	Included in LACW, C&I and C&D targets	N/A

## Local Authority Collected Waste

- 4.4 The North London Boroughs and the NLWA are committed to achieving the 50% recycling by 2025 target set out in the Mayor's Environment Strategy. The North London Boroughs, together with the NLWA, are beginning a renewed drive to increase recycling including looking at ways to standardise collection regimes. In addition, the London Waste and Recycling Board (LWARB) works with London Boroughs to increase recycling rates and supports waste authorities in improving waste management services.
- 4.5 The NLWA's long term waste management solution is based upon the continued use of the existing Edmonton facility until 2025 and the development of a new energy recovery facility on the same site to be operational from 2025 onwards. Further information on how it has informed the NLWP is set out in section 4.
- 4.6 The European Commission has put forward a Circular Economy Package<sup>11</sup>. This includes a 65% recycling target for municipal waste (LACW and C&I) by 2030. Notwithstanding the UK leaving the EU, the UK has signed up to delivering these targets as part of Brexit. The Circular Economy Package (CEP) recycling target of 65% municipal waste by 2030 has been superseded by the London Environment Strategy (LES) published in May 2018 in time to be incorporated into the NLWP. The LES aims to achieve 65% recycling from London's 'municipal' waste by 2030; this will be achieved through a 50% recycling rate from LACW by 2025 (LES Policy 7.2.1) and 75% from business waste by 2030 (LES policy 7.2.2). This is a collective target across the whole of London. The LES therefore goes further than the CEP by bringing forward London's LACW recycling target to 2025. The LES states that the Mayor expects waste authorities to collectively achieve a 50 per cent LACW recycling target by 2025 and aspire to achieve 45% household waste recycling by 2025 and 50% by 2030. Responsibility falls largely to London Boroughs in their capacity as waste collection and waste disposal authorities. The NLWA are expected to contribute to the Mayor's targets and produce a waste strategy to show they are acting in conformity with the LES policies and proposals (see LES Box 36).

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<sup>11</sup> European Commission Circular Economy Package [http://ec.europa.eu/environment/circular-economy/index\\_en.htm](http://ec.europa.eu/environment/circular-economy/index_en.htm)

- 4.7 Waste minimisation seeks to reduce the amount of waste produced by targeting particular behaviours and practices. As shown in Figure 4, preventing waste generation in the first place sits at the top of the waste hierarchy.
- 4.8 The London Environment Strategy prioritises resource efficiency to significantly reduce waste and promotes reuse and repair. LWARB's 'Circular Economy route map' exemplifies a move towards a more resource efficient waste service. The route map builds on the 5 focus areas (the built environment, food, textiles, electricals and plastics) and sets out 8 cross cutting themes to ensure the benefits of a circular economy can be achieved across a number of sectors.
- 4.9 The North London Boroughs co-ordinate waste prevention activity through the NLWA's waste prevention plan. The NLWA run waste minimisation activities for schools and communities. These are delivered through the NLWA's "Wise up to Waste" programme and currently focuses on three priority areas: reducing food waste, encouraging a reduction of furniture waste by increasing re-use, and reducing textile waste (both clothing and non-clothing).

#### **Commercial and Industrial Waste**

- 4.10 Through the London Environment Strategy, the Mayor is seeking to make London a zero waste city with no biodegradable or recyclable waste sent to landfill by 2026 and by aiming to achieve 65% recycling from London's 'municipal' waste by 2030; this will be achieved through a 50% recycling rate from LACW by 2025 (Policy 7.2.1) and 75% from business waste by 2030 (policy 7.2.2). This is a collective target across the whole of London. The Mayor has also said that he does not expect there to be a need for any new energy from waste capacity if existing planned sites are completed (policy 7.3.2.b). The Mayor has also indicated that he will use his powers to ensure there are sufficient sites to manage London's waste. The Environment Strategy embraces the principles of the Circular Economy requiring manufacturers to design products to generate less waste and which can be easily repaired, reused and recycled, and the strategy encourages the development of business to facilitate this.
- 4.11 There are a number of national schemes which promote waste minimisation. This includes the [Courtauld Commitment](#) which aims to reduce food waste, grocery packaging and product waste, both in the home and the grocery sector by 20%, the Mayor's Environment Strategy seeks to go further by setting a target of 50% reduction per head by 2030.

- 4.12 European Commission Circular Economy Package<sup>12</sup> include increased recycling targets for packaging materials in the commercial and industrial sectors of 65% by 2025 and 75% by 2030. The UK has committed to delivering the Circular Economy targets as part of Brexit.

#### **Construction, Demolition and Excavation Waste**

- 4.13 The draft New London Plan(December 2019) includes a target of 95% reuse/recycling/recovery of C&D waste and 95% beneficial use of excavation waste.. Beneficial use could include using excavated material within the development, or in habitat creation, flood defences or landfill restoration. Preference should be given to using the materials on-site or within local projects.

#### **Hazardous Waste**

- 4.14 There are a number of initiatives in place to ensure better implementation of EU waste legislation, including on hazardous waste. None of the circular economy proposals referred to 5.13 announced by the European Commission in December 2015 will affect the NLWP strategy for hazardous waste.

#### **Options for modelling North London's future waste arisings**

- 4.15 In accordance with the NPPF (paragraph 35) to ensure the NLWP is justified, a range of options were tested as part of the consideration of reasonable alternatives for modelling North London's waste arisings over the plan period. Analysis of and consultation on these options led to the selection of a preferred strategy. These options seek to reflect the effects of future economic activity, including fiscal, financial and legislative factors such as landfill tax charges driving waste away from landfill, and financial incentives such as ROCs (Renewable Obligations Certificates) increasing the competitiveness of energy recovery. Employment growth is based on demographic projections of employment in the London Plan using North London Borough employment projections and is applied to the growth rates for the C&I and CD&E streams. For the LACW stream, the NLWA have provided the projections which have been used to inform the proposed application for a Development Consent Order to enable them to develop and operate an Energy Recovery Facility (ERF) at

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<sup>12</sup> [http://ec.europa.eu/environment/circular-economy/index\\_en.htm](http://ec.europa.eu/environment/circular-economy/index_en.htm)

the Edmonton EcoPark from 2026. The scenarios considered are summarised in Table 4, with the preferred scenarios highlighted.

**Table 4: Options considered for forecasting North London’s waste arisings and need**

LACW	C&I	C&D	Excavation	Hazardous	Agricultural
Capacity options					
Meeting the London Plan apportionment	Meeting the London Plan apportionment	Baseline (no change)	Baseline (no change)	Baseline (no change)	Baseline (no change)
Net self-sufficiency	Net self-sufficiency	Net self-sufficiency	Managing as much as possible in North London	Net self-sufficiency	
Self-sufficiency	Self-sufficiency	Self-sufficiency		Self-sufficiency	
Growth Options					
	No growth (0% pa)	No growth (0% pa)	No growth (0% pa)	No growth (0% pa)	No growth (0% pa)
	Minimised growth (0.40% pa)	Minimised growth (0.40% pa)	Minimised growth (0.40% pa)	Minimised growth (0.40% pa)	

LACW	C&I	C&D	Excavation	Hazardous	Agricultural
NLWA Waste Forecasting Model <sup>13</sup>	Growth (0.81% pa)	Growth (0.81% pa)	Growth (0.81% pa)	Growth (0.81% pa)	
<b>Management Options</b>					
	Baseline (no change)	Baseline (no change)	Baseline (no change)	Baseline (no change)	Baseline (no change)
	Median 80% recycling by 2035 16% Energy Recovery by 2035 4% to Landfill by 2035	Median 85% recycling 9% treatment 6% landfill			

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<sup>13</sup> [The NLWA Forecasting Model is summarised here](#)

LACW	C&I	C&D	Excavation	Hazardous	Agricultural
NLWA Forecasting model Central Scenario	Maximised	Maximised	Maximised		
44% recycling by 2035	85% Recycling by 2035	95% recycling / recovery / reuse	95% beneficial use		
(50% HH recycling by 2035)	12% Energy Recovery by 2035	5% landfill	5% landfill		
55% Energy Recovery by 2035	3% to Landfill by 2035				
1% landfill					

4.16 Further details of these options is available in NLWP Data Study 2. An Options Appraisal Report (2019) has also been prepared which provides more detail on each of the options considered and provides information on the different scenarios including how much waste would be generated over the plan period (incorporating economic and population growth assumptions), how much waste could be managed within North London (net self-sufficiency options), and how this waste should be managed (management options) for each of the options considered. Meeting North London’s LACW, C&I and C&D waste arisings, including hazardous waste, was the preferred net self-sufficiency option because it is compliant with national legislation on managing all main waste streams. In addition, it demonstrates to neighbouring authorities outside London that North London intends to manage as much of its own waste as possible and reduce exports. Growth of 0.81% was chosen as the preferred option because GLA evidence and projections anticipate substantial population and economic growth in London over the next few decades. Maximised Recycling was chosen as the preferred option for the management strategy because it aligns with national, regional and local recycling targets. This option also means that more waste will be managed further up the waste hierarchy with more opportunity to divert waste away from landfill.

4.17 The chosen approach for the NLWP following the option appraisal can be summarised as follows:

**Chosen Approach for planning for North London’s waste**

Population/Economic Growth in line with London Plan forecasts

+ Maximising Recycling

+ Net self-sufficiency for LACW, C&I and C&D by 2026 (including hazardous waste)

= Quantity of waste to be managed

- 4.18 It is considered that this approach provides the most robust modelling scenario to project future capacity gaps, taking account of existing/planned capacity, and waste management needs.
- 4.19 The results of the modelling of the preferred strategy for waste arisings over the plan period is set out in Table 5 below. The baseline data for these projections are the waste arisings figures set out in Table 2 of this plan. These figures represent two sets of projections. The first is how North London’s waste is most likely to be managed over the plan period, aligned with the levels in the waste hierarchy (see STRATEGIC OBJECTIVE 1). While some of North London’s waste will still be exported for management or disposal to landfill, the aim of the NLWP is to deliver the equivalent capacity for LACW, C&I, C&D and hazardous waste within its administrative borders. Therefore Table 5 also shows the total amount of waste arising in North London which the Boroughs need to provide capacity for (net self-sufficiency). This is in line with STRATEGIC OBJECTIVE 3 which is to plan for net self-sufficiency by providing opportunities to manage as much as practicable of North London’s waste within the Plan area. Prevention and re-use also have a part to play, but in terms of waste management capacity in North London, recovery and recycling will play the most substantial part.
- 4.20 Table 8 sets out waste arisings over the plan period and how much of the total will need to be recycled to meet the Mayor’s targets shown in Table 3. The LACW figures in Table 5 are taken from the NLWP data study which reflects the NLWA modelling. The NLWA model is based on achieving 50% household waste recycling. Over 80% of total LACW is household waste and the remainder is mostly business waste. The NLWA model assumes business waste recycling improves gradually over time as business waste recycling continues to be encouraged and recycling behaviours change. The combined household and business waste recycling rate in the NLWA model is 44%. In order to meet the Mayor’s target of 65% recycling of municipal

waste by 2030, around 85% of the ‘municipal’ portion of the C&I waste stream needs to be recycled. The ‘municipal’ portion of the C&I waste stream is estimated to be around two thirds of the total<sup>14</sup>. The recycling rates for the municipal portion of the C&I waste stream rise to 85% by 2030 which, together with household and business waste recycling in the LACW waste stream, achieves 65% recycling of municipal waste by 2030 in line with the Mayor’s target. The C&D waste stream has a recycling rate of 95% and excavation waste a beneficial use rate of 95% in line with the London Plan targets.

**Table 5: Projected arisings and management of North London’s waste 2020-2035**

Waste Stream	Facility Type	2020	2025	2030	2035
LACW	Recycling	418,169	424,049	430,280	436,824
LACW	Recovery (EfW), Treatment	566,872	572,856	579,725	587,352
LACW	Landfill	2,000	2,000	2,000	2,000
<b>Total LACW arisings (capacity required for net self-sufficiency)</b>		<b>987,041</b>	<b>998,905</b>	<b>1,012,005</b>	<b>1,026,176</b>
C&I	Recycling	525,853	566,563	609,743	634,983
C&I	Recovery (EfW), Treatment	152,448	142,523	131,513	136,957
C&I	Landfill	109,139	110,951	112,726	117,392
<b>Total C&amp;I waste arisings (capacity required for net self-sufficiency)</b>		<b>787,440</b>	<b>820,037</b>	<b>853,982</b>	<b>889,332</b>
C&D	Recycling	435,054	453,063	471,816	491,347
C&D	Landfill	22,742	23,683	24,664	25,685

<sup>14</sup> Separate figures for municipal and other C&I waste are set out in the Data Study Addendum Appendix A: Waste arisings forecast scenario taken forward in the NLWP.

Waste Stream	Facility Type	2020	2025	2030	2035
<b>Total C&amp;D waste arisings (capacity required for net self-sufficiency)</b>		<b>457,796</b>	<b>476,746</b>	<b>496,480</b>	<b>517,032</b>
Hazardous	Recycling	16,838	16,838	16,838	16,838
Hazardous	Recovery, Treatment	23,846	23,846	23,846	23,846
Hazardous	Landfill	12,737	12,737	12,737	12,737
<b>Total Hazardous waste arisings (capacity required for net self-sufficiency)</b>		<b>53,421</b>	<b>53,421</b>	<b>53,421</b>	<b>53,421</b>
Excavation	Beneficial use, Recycling, Treatment	733,294	763,647	795,257	828,176
Excavation	Landfill	38,594	40,192	41,856	43,588
<b>Total Excavation waste arisings</b>		<b>771,888</b>	<b>803,839</b>	<b>837,113</b>	<b>871,764</b>
Agricultural	Recycling	89	89	89	89
Agricultural	Recovery, Treatment	9,130	9,130	9,130	9,130
Agricultural	Landfill	4	4	4	4
<b>Total Agricultural waste arisings</b>		<b>9,223</b>	<b>9,223</b>	<b>9,223</b>	<b>9,223</b>

### Existing Capacity

4.21 Table 3 below summarises the existing (2016) capacity of North London's waste management facilities by type of facility and waste stream managed. It identifies an existing waste management capacity of just over a million tonnes per annum of recycling/composting for the LACW and C&I waste streams, just under 600,000 tonnes per annum of energy recovery for LACW, around 630,000 tonnes per annum of recycling and treatment for CD&E waste, and about 4,250 tonnes of hazardous waste capacity. . Figure 5 shows the location of the facilities represented in Table 6 and a full list is in Appendix 1.

**Table 6: Existing Annual Capacity at Licensed Operational Waste Management Facilities**

Type of capacity		Waste stream	Existing capacity (2016)
Management	Recycling / Composting / Treatment	LACW / C&I	1,062,424
		CD&E	633,436
		Hazardous	4,252
	Energy Recovery	LACW / C&I	597,134
	Transfer	All	1,225,068
	Landfill	All	0

Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2012-2016

4.22 The London Plan defines the technologies and processes which constitute ‘managing’ waste and these have been applied to North London’s facilities when calculating capacity. Only facilities which recycle and compost waste or recover energy from waste count towards waste ‘management’ in North London. Transfer Stations are therefore excluded from this total, although many facilities categorised as ‘transfer stations’ do some recycling and where recycling takes place at transfer stations this has been noted in the site profiles and added to the total in Table 6.

#### **Changes to Capacity over the Plan Period**

4.23 Waste management capacity in North London will change over the plan period with some facilities moving or closing down and new facilities being built. This section sets out what we currently know about such changes.

#### **Edmonton EcoPark**

4.24 A Development Consent Order (DCO) has been approved by the Secretary of State for a new Energy Recovery Facility (ERF) which will manage the treatment of the residual element of LACW during the NLWP plan period and beyond. The existing Edmonton EfW provides just under 600,000 tonnes of waste management capacity per annum and the new facility will provide around 700,000 tonnes per annum. This

is an additional 100,000 tonnes which has been built into the calculation for the capacity gap.

- 4.25 The NLWA's DCO allows for the loss of the composting plant at the Edmonton EcoPark site in 2020 to make way for the new ERF facility to be built whilst maintaining the current EfW operation and the NLWA are not intending to build a replacement facility. This will result in a capacity loss of around 35,200 tonnes per annum. This has been built into the calculation of the capacity gap. The development also includes a Resource Recovery Facility (RRF) including a new Reuse and Recycling Centre (RRC), a relocated transfer hall and a bulky waste/fuel preparation facility on the site.

### **Powerday**

- 4.26 Powerday in Enfield is an existing site currently operating as a Waste Transfer Station. Planning permission was granted for an upgrade to a Materials Recovery Facility (MRF) capable of handling 300,000 tonnes of C&I and C&D waste per annum and the new facility was opened in 2015. However, this increase in capacity has not yet happened and it is not clear if the planning permission will be implemented. Therefore this has not been added to the pipeline capacity, however throughput for the site will be monitored and if additional capacity comes online it will be used to close the capacity gap.

### **Loss and re-provision of existing waste management facilities**

- 4.27 Where existing sites need to be relocated, compensatory capacity is required in order to comply with the London Plan, Borough Local Plans and, once adopted, the NLWP. It is known that some waste sites in North London will be redeveloped for other uses as part of the Brent Cross Cricklewood Regeneration scheme. . This information has been highlighted in Schedule 1.
- 4.28 The Brent Cross Cricklewood Regeneration Area (BXC) includes four existing waste sites, comprising a NLWA transfer station and three commercial operations. These are BAR3 PB Donoghue, BAR4 Hendon Transfer Station, BAR6 McGovern, and BAR7 Cripps Skips. These sites will be redeveloped under the planning permission for the regeneration of Brent Cross Cricklewood (Barnet planning application reference F/04687/13). The Hendon Rail Transfer Station (BAR 4) will be replaced with a new facility to meet the NLWA's requirements; planning permission for a new Waste Transfer Station (WTS) at Geron Way was granted by Barnet Council in September 2018 (Barnet planning application reference 17/6714/EIA). The existing commercial facilities at BAR 6 and BAR 7 fall within the land required to deliver the early Southern phase of the BXC regeneration which has commenced. . The BAR3 site is currently identified for redevelopment in Phase 4 of the BXC regeneration. It is planned that

capacity at the waste facilities of BAR4, BAR6 and BAR7 and part of the capacity of BAR3 would be replaced by the new Waste Transfer Station (WTS) delivered as part of the Brent Cross Cricklewood Regeneration. The balance of replacement capacity for BAR3 would need to be identified prior to its redevelopment and the London Borough of Barnet will seek to provide replacement capacity within the borough. The Barnet Local Plan will identify potential sites. For the purposes of the plan, therefore, it is assumed there will be no loss of capacity for these facilities.

- 4.29 Two facilities in Waltham Forest (GBN Services and Pulse Environmental) have closed and their capacity has been replaced in a new facility operated by GBN services in Enfield. While the capacity has moved to a different Borough, there is no loss of capacity for North London as a whole. The new GBN facility is newly built but has been designed with sufficient capacity to replace that lost at the two Waltham Forest facilities and therefore, for the purposes of the plan the capacity of these facilities is assumed to remain the same. The new facility may also be able to provide capacity on top of what has been replaced, and this will be monitored.

#### Meeting the Capacity Gap

- 4.30 The capacity gap is the difference between projected waste arisings (Table 8) and existing capacity (Table 3). Table 7 below sets out the capacity gap broken down in to 5 year periods over the NLWP plan period. It takes account of the known changes to capacity over the plan period, including the upgrading and loss of existing facilities. ). North London can accommodate recycling, composting, treatment and recovery facilities to manage waste and so additional waste management capacity will be in the 'recycling' and 'recovery' tiers of the waste hierarchy in line with STRATEGIC OBJECTIVE 1.

**Table 7: Capacity gaps throughout the Plan period (tonnes)**

LACW/C&I	2020	2025	2030	2035
Projections	1,774,481	1,818,942	1,865,987	1,915,508
Existing capacity – recycling/ composting	1,076,129	1,076,129	1,076,129	1,076,129
Existing and pipeline capacity - recovery	597,134	700,000	700,000	700,000
Loss of capacity - composting	-	35,200	35,200	35,200
Capacity Gap	<b>-101,218</b>	<b>-78,013</b>	<b>-125,058</b>	<b>-174,579</b>

C&D	2020	2025	2030	2035
Projections	457,796	476,746	496,480	517,032
Existing capacity	633,436	633,436	633,436	633,436
Additional pipeline capacity	0	0	0	0
Surplus capacity	<b>+175,640</b>	<b>+156,690</b>	<b>+136,956</b>	<b>+116,404</b>

Hazardous	2020	2025	2030	2035
Projections	53,421	53,421	53,421	53,421
Existing and pipeline capacity	4,252	4,252	4,252	4,252
Capacity Gap	<b>-49,169</b>	<b>-49,169</b>	<b>-49,169</b>	<b>-49,169</b>

- 4.31 To meet the capacity gaps identified in Table 7, the North London Boroughs will seek opportunities for new capacity through intensification of existing sites and/or new facilities. The North London Boroughs contacted existing waste operators to find out if there are any current plans to upgrade or intensify their facilities (see Section 4 and Policy 1).
- 4.32 In order to estimate how much land is required for plan-making purposes, the capacity gap has been converted into a land area requirement based on a typical throughput per hectare for each type of facility. The amount of land required depends on the type of facility and the technology being used. New technologies may come forward during the plan period which have a higher throughput per hectare and so will require less land. The North London Boroughs want to ensure the best use of land in the area and this means maximising the capacity of a site while mitigating any environmental impacts. The land required is indicative only and new capacity will be monitored rather than land. Reference capacities are set out in Table 8 below. Table 20 in section 7 of the Data Study Part 2 (2019) provides a fuller explanation. Table 9 below sets out the amount of land required within North London to meet the capacity gaps identified in Table 6 for the chosen approach of net self-sufficiency for LACW, C&I and C&D waste streams. In order for net self-

sufficiency to be achieved by 2026, in line with the London Plan, new capacity will need to be delivered by this date.

**Table 8: Reference Capacities for Land Take for New Waste Facilities**

Facility type	Assumed tonnes per hectare
Energy from waste (large scale)	165,000
Recycling (C+I & LACW)	128,000
Recycling (C+D)	100,000
Recycling (specialised – eg. metals)	50,000
Recycling (Hazardous)	10,000
Re-use	15,000
Composting	25,000
Treatment plant	50,000
Treatment Plant (Hazardous)	10,000

**Table 9: Indicative land take requirements for meeting the capacity gap t**

Waste Stream	Management type	Hectares
		2026
C&I/LACW	Recycling	1.5
Hazardous	Recycling/recovery/treatment	4.9
<b>TOTAL land required in North London</b>		<b>6.4</b>

4.33 There is a requirement for additional recycling capacity to manage the increasing levels of recycled waste expected from the LACW/C&I waste stream reflecting the recycling of 65% from municipal waste (LACW and commercial waste).

- 4.34 A capacity gap equivalent to around 4.9 hectares of land has been identified for meeting North London’s hazardous waste management need over the plan period. While the North London Boroughs support the provision of hazardous waste facilities in appropriate locations, it is acknowledged that these facilities generally operate for a wider-than-local catchment area due to their specialist nature. The Boroughs will therefore work with the GLA and other boroughs across London to identify and meet a regional need.
- 4.35 Additional land is not required to accommodate new facilities for Low Level Non-Nuclear Radioactive Waste (LLW), Agricultural Waste or Waste Water/Sewage Sludge during the plan period.
- 4.36 The following section sets out the process of identifying suitable locations for new waste capacity to meet the capacity gaps set out in Table 7.

## 5 Sites and Areas

- 5.1 This section sets out the approach to ensuring that there is sufficient land for future waste management facilities in North London to provide for the delivery of North London's identified capacity requirements. Sections 3-6 of the National Planning Policy for Waste (NPPW) set out the approach Local Plans should take to identify future waste requirements over the plan period and this has been used to help develop the approach to identifying future locations for waste development in North London.
- 5.2 At the core of waste planning is the requirement for waste planning authorities to "prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams" (NPPW 3). In particular, waste planning authorities should "identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations" (NPPW 4).
- 5.3 The London Plan (Policy SI8) requires Development Plans to plan for identified need and "allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste". The London Plan also identifies existing waste sites, Strategic Industrial Land (SIL) and Locally Significant Industrial Sites as a focus for new waste capacity.
- 5.4 STRATEGIC OBJECTIVE 2 seeks to ensure there is sufficient suitable land available to meet North London's waste management needs and reduce the movements of waste through safeguarding existing sites and identifying locations for new waste facilities.
- 5.5 Known opportunities to intensify and upgrade existing facilities have already been taken into account in section 4 and have been incorporated into the calculations for meeting the capacity gap. Where further opportunities to optimise waste management capacity on existing sites arise, this is supported by Policy 1 where the proposal is in line with relevant aims and policies in the North London Waste Plan, the London Plan, Local Plans and related guidance.
- 5.6 North London's identified waste need and capacity gap is set out in section 4 and summarised in Table 7 above. Additional facilities to meet the capacity gap would require approximately 6.4ha of land, depending on the type of technology used.
- 5.7 The NLWP North London Boroughs assessed a range of sites and areas to meet future waste needs. Assessment criteria have been developed using waste planning policy and in consultation with key stakeholders in a series of focus groups. This work is set out in the Sites and Areas Report. A 'site' in this context is an individual

plot of land that is safeguarded for waste use only. An 'Area' comprises a number of individual plots of land, for example, an industrial estate or employment area that is in principle suitable for waste use but where land is not specifically safeguarded for waste. The NPPW and the London Plan endorse the identification of “sites and/or areas” in Local Plans. The approach is also supported by the waste industry and key stakeholder in consultation.

### **Site and Area Search Criteria**

- 5.8 When seeking suitable locations for new waste facilities, the Boroughs took into account NPPW paragraph 4 which states that waste planning authorities should “consider a broad range of locations including industrial sites” and “give priority to the re-use of previously developed land [and] sites identified for employment uses”. The London Plan identifies suitable locations in policy SI8 as existing waste sites and SIL/LSIS. Waste facilities are considered to be industrial uses and are therefore considered suitable, in principle, to be developed on any industrial land in North London. However, in preparing the NLWP, the North London Boroughs have sought to refine this approach and direct new waste facilities towards locations assessed and selected as the most suitable in North London which are identified as “Priority Areas” in the Plan. The criteria used in the NLWP site and area selection process were developed based on the requirements of the National Planning Policy Framework, National Planning Policy for Waste<sup>15</sup>, Planning Practice Guidance and the London Plan. Both planning and spatial criteria were discussed with key stakeholders through a focus group session in spring 2014 .

### **Site and Area Search and Selection Process (Methodology)**

- 5.9 An extensive site and area search and selection process has been undertaken. Full details of the site and area selection exercise are set out in the ‘Sites and Areas Report’ and the ‘Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP’ Report available on the NLWP website. In summary it has involved the following key stages:

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<sup>15</sup> Following the introduction of the National Planning Policy for Waste NPPW in October 2014 to replace Planning Policy Statement PPS10, the site and area search criteria were reviewed to ensure compliance with this document.

- i. Survey of existing waste sites – this involved a detailed review of the existing waste sites, including obtaining information from the operators on their future plans and validation of existing information held regarding their sites. This work indicated that there was insufficient capacity within existing sites to meet the expected waste arisings over the plan period.
- ii. Call for sites - a call for sites exercise was carried out in two stages. This included targeting existing operators, landowners and other interested parties requesting them to put sites forward for consideration.
- iii. Land availability search – this was an initial search into the land available in North London that may be suitable for the development of waste management infrastructure. At this stage, all available sites and areas were included in the process in order that the site and area assessment process for the NLWP could then be applied. The result of this work was to identify a long list of potential sites and areas.
- iv. Desk based site and area assessment – the long list of sites and areas was then assessed against the selection criteria. As shown in Table 10 below, the assessment criteria were split into two levels, absolute criteria and screening criteria. The absolute criteria were applied first to determine if the identified constraints affected part of the proposed sites and areas, resulting in their removal. The remaining sites and areas were then subject to the screening criteria. The aim of using the absolute criteria was to ensure that those sites/areas which are wholly unsuitable are excluded from further consideration and to identify those which may be suitable.
- v. Site visits were undertaken in August and October 2014 to check and refine information from the desk based assessment and make a visual assessment of the suitability for different types of waste management facilities as well as the relationship with adjoining development. The information was used to complete the criteria-based assessment to ultimately determine the suitability of the sites/areas for future waste development as well as evaluate the potential facility types.
- vi. Areas identified as suitable for future waste management facilities were subject to an assessment to calculate the level of capacity they could reasonably be expected to provide. Firstly the proportion of North London’s industrial land in waste use was established. This showed the ability of waste facilities to compete with other land uses in these areas was good and that waste is a growing sector in contrast to declining industries such as manufacturing. Secondly, a review of the vacancy rates and business churn for industrial land was used to estimate the proportion of land within these

areas which are likely to become available over the plan period. Further information is available in the Sites and Areas Report.

- vii. Sustainability Appraisal<sup>16</sup> and Habitats Regulation Assessment<sup>17</sup> of sites/areas – all proposed sites and areas have been subject to these assessments and the findings fed into the policy recommendations.
- viii. Consultation with Landowners – Following completion of the above, land owners for all the sites remaining were contacted to seek feedback on the inclusion of their land as a waste site allocation. The findings of this work have further refined the list of sites and further information can be found in the Sites and Areas Report.
- ix. Sequential test – any sites and areas lying within a level 2 or 3 flood risk zone have been subject to sequential testing to assess the potential impact of a waste development in this zone. The results of this work can be found in the Sites and Areas Report.
- x. Following consultation responses on the Draft Plan, a Sites and Areas Options Appraisal was prepared to analyse a number of different approaches for reducing the total quantum of land identified for new waste facilities and creating a better geographical spread of waste facilities in line with Spatial Principle B. This resulted in the reduction of total land identified for new waste facilities from 351.8ha in the Draft Plan to 102.38ha in the Proposed Submission Plan.

5.10 The assessment criteria applied to all sites and areas is listed in Table 10 below. The criteria have been used in assessing sites and areas during both the desk based assessment and site visits.

**Table 10: Sites and Areas Assessment Criteria**

Absolute Criteria	Screening Criteria
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<sup>16</sup> Sustainability appraisal is the assessment of the potential impact against an agreed set of social, environmental and economic objectives. It encompasses the requirement of Strategic Environmental Assessment which is a requirement of Europe that all plans undergo.

<sup>17</sup> HRA is a requirement of Europe that all plans are assessed against their potential impact of natura 2000 sites.

Absolute Criteria	Screening Criteria
<ul style="list-style-type: none"> <li>• Metropolitan Open Land (MOL)</li> <li>• Green Belt (for built facilities)</li> <li>• Grade 1 &amp; 2 agricultural land (part of the Green belt)</li> <li>• Sites of international importance for conservation e.g. Ramsar sites, Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)</li> <li>• Sites of national importance for conservation e.g. Sites of Special Scientific Interest and National Nature Reserves</li> <li>• Ancient Woodlands</li> <li>• Scheduled Ancient Monuments</li> <li>• Listed Buildings (grade I and II*)</li> <li>• Registered Parks and Gardens (grade I and II*)</li> <li>• Registered battle fields</li> <li>• Areas of Outstanding Natural Beauty (AONB)</li> <li>• Protected open spaces</li> <li>• Landscape designations such as Areas of Special Character (part of the Green Belt)</li> </ul>	<ul style="list-style-type: none"> <li>• Sites of local importance for nature conservation (SINCs)</li> <li>• Flood risk areas/flood plain</li> <li>• Accessibility (proximity to road, rail, canal/river)</li> <li>• Sites and areas greater than 2km from the primary route network</li> <li>• Ground water protection zones</li> <li>• Surface waters</li> <li>• Major aquifers</li> <li>• Airfield safeguarding areas (Birdstrike zones)</li> <li>• Air Quality Management Areas</li> <li>• Unstable land</li> <li>• Green belt (for non-built facilities)</li> <li>• Local Plan designations</li> <li>• Settings of Scheduled Ancient Monuments</li> <li>• Settings of Listed Buildings</li> <li>• Settings of Registered Parks and Gardens (grade I and II*)</li> <li>• Neighbouring land uses</li> <li>• Proximity to sensitive receptors</li> </ul>

5.11 The sites and areas identified as a result of the methodology set out above were consulted on as part of the Draft Plan prepared under Regulation 18 of the Town and Country Planning Regulations 2012. This was set out in the Sites and Areas Report 2015 which was updated in 2019 for the Proposed Submission NLWP.

- 5.12 In order to respond to issues raised during consultation on the suitability of the Draft Plan proposed sites and areas, the North London Boroughs undertook four areas of further work in order to identify which sites and areas should be taken forward:
- Gather and assess additional information on sites/areas
  - Changes to policy wording on reducing the impact of new waste development
  - Seek a better geographical spread of waste facilities
  - Consider options to reduce the amount of land taken forward in the Proposed Submission Plan
- 5.13 The additional information gathered and assessed included transport evaluations, potential mitigation measures, updating flood risk information and other environmental factors, consideration of where waste facilities might be best located within an Area, heritage and National Grid assets, and identifying Areas within an Opportunity Area, Housing Zone, Crossrail 2 or Lee Valley Regional Park. This information helped inform amendments to Policy 6, and Area Profiles were updated accordingly with a further assessment of the suitability of the proposed sites and areas undertaken.
- 5.14 In response to comments about the distribution of waste facilities across North London, Spatial Principle B was amended from ‘Seek a network of waste sites across North London’ to ‘Seek a better geographical spread of waste sites across North London, consistent with the principles of sustainable development’. This change provided the basis for further work on the distribution of Areas taken forward in the Proposed Submission Plan. 8.25 (part) In considering geographical spread of facilities and reducing the sites and areas to be taken forward in the Proposed Submission Plan, each Borough’s current contribution to waste management capacity in North London was calculated. Currently 62% of the total land in existing waste use across North London is located in Enfield. In order to address concerns that there is an over-concentration of waste facilities in Enfield, promote a better geographic spread of waste facilities in North London, and reduce the amount of land taken forward into the Proposed Submission Plan, the Boroughs considered five alternatives with different land options. The details of these options are brought together in ‘Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP’ (updated 2020).
- 5.15 The options included and excluded areas based on their performance against qualitative assessment criteria, such as Local Plan designations and performance against suitability rating (banding) as detailed in the Sites and Areas Report. Analysis of each of the five options considered, amongst other issues, the proportion of Enfield’s contribution to the Areas identified. One of the options limited the number of Areas for new waste facilities in Enfield to one. The option with the lowest land provided (102ha) combined with the best geographical spread (limiting the land

identified in Enfield) has been taken forward into this Plan. In looking to reduce the total amount of land identified as most suitable for new waste uses, the Boroughs did not identify any criterion which would provide a sound basis to reduce the number of areas further than a combined total of 102ha. The other options did not significantly reduce the amount of land identified and/or did not provide a better geographical spread of Areas. The preferred option was to take forward land designated as industrial land and high-performing (Band B) areas, while achieving a better geographical spread by reducing the amount of land for new waste facilities identified in Enfield. This focus on industrial land and the highest performing areas helps to locate waste facilities away from residential properties, as far as this is possible in an urban area like North London.

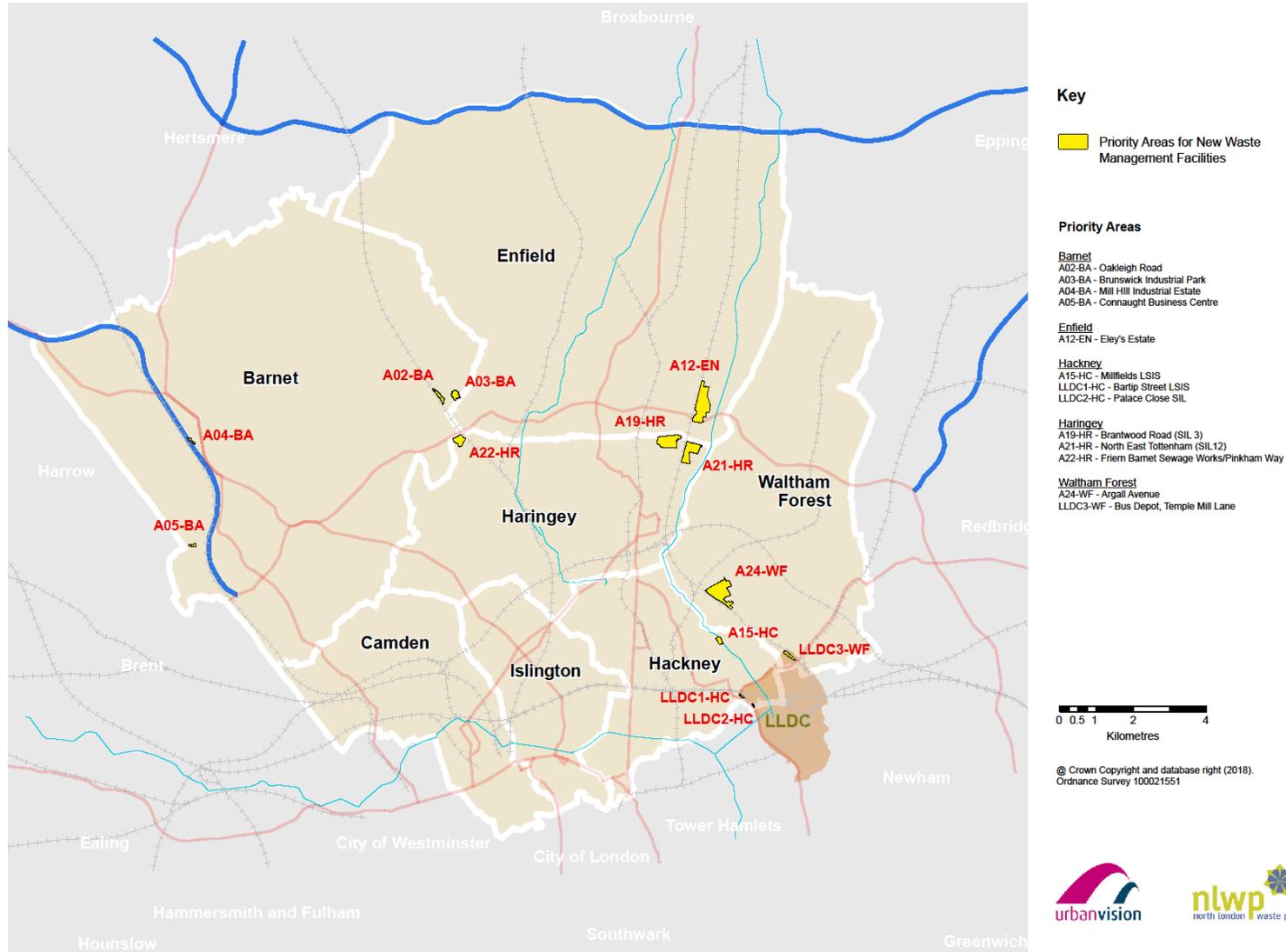
- 5.16 Following the work described above, all of the individual sites and several of the Areas were removed from Schedules 2 and 3 and in some of the remaining Areas the amount of land considered most suitable for new waste facilities was refined. The NLWP therefore takes an area-based approach to waste planning with no individual sites allocated for new waste facilities. An area-based approach is to one which identifies areas which comprise a number of individual plots of land, for example, an industrial estate or employment area, that is in principle suitable for waste use but where land is not specifically safeguarded for waste uses. The identification of Areas allows for flexibility in bringing forward a range of locations across North London, allowing for a better geographic spread of opportunities for future waste development that is consistent with the spatial principles of the plan to meet North London's requirement. However, because the Areas identified are not safeguarded solely for waste use it is important to identify sufficient land to ensure adequate opportunity across North London for waste operators to provide new facilities because there will be competition for this land by other industrial users. It should be noted that most waste planning authorities are in the same position and that this approach is supported by both the NPPW and the London Plan.
- 5.17 An update to the Data Study to support the Proposed Submission NLWP reduced the indicative land required to meet the capacity gap from 12ha in the Draft NLWP to 9ha in the Proposed Submission NLWP. This has since reduced further to 6.4ha in light of the Data Study Addendum (2020). For the Plan to provide confidence that sufficient land is available in the right place and at the right time a quantum of land and number of Areas has to be identified.
- 5.18 As identified in the Sites and Areas Report, it is not possible to say precisely how much of North London's industrial land could become available for waste uses over the plan period. This depends on the rate at which existing land becomes vacant in the identified Areas and a waste operator being ready and able to locate on that same site. This in turn depends on the wider economic factors. Identifying a range of land suitable for new waste facilities responds to the NPPW expectation that waste

planning authorities “should identify sufficient opportunities to meet the identified needs of their area”. This also provides flexibility for waste operators and should sites not become available in one particular Area, or if an Area changes over the plan period to become unsuitable for waste uses, this approach will ensure there are alternative land options available.

- 5.19 The work set out in the ‘Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP’ resulted in reducing the total amount of land identified as most suitable for new waste facilities from 351.8 in the Draft Plan to 102.38ha in the Proposed Submission Plan. While 102ha is a large area when compared to the need for 6.4ha, this land is currently occupied by existing industrial uses. There is strong competition for industrial land in North London and this is reflected by low vacancy rates (an average of 4.8%). The Boroughs will rely on business churn for release of individual sites which could come forward for waste uses. The most recent analysis of business churn in London suggests that around 20% of land could be released in this way. Analysis of business churn and vacancy rates is included in the Sites and Areas Report. To provide 6.4ha, 6% of the Priority Areas would need to be developed for waste management to meet the capacity gap, if no additional capacity is provided on existing sites. It should be noted that 6.4ha of land is indicative only and throughput on a site will depend on the operational technology used. New capacity to meet North London’s needs will be monitored rather than land take.
- 5.20 The preferred approach limits the areas proposed for new waste facilities in Enfield to one industrial area and although this option is considered the most appropriate to take forward in the NLWP, there is a risk that the identified Area in Enfield (comprising 26ha) could accommodate all new waste capacity, which would not respect Spatial Principle B or generally encourage a sustainable distribution. There is also a possibility that applications could come forward for new waste facilities on other industrial land in Enfield. To address this, the ‘Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP’ recommends a ‘Priority Areas’ sequential approach to ensure developers consider siting a facility within the Areas listed in Schedules 2 and 3 before other locations. In addition, developers should seek sites in Priority Areas outside Enfield before considering sites in Enfield. This recommendation has been taken forward in Policy 2: Priority Areas for New Waste Management Facilities and Policy 3: Windfall Sites.
- 5.21 The Priority Areas, shown in Figure 11 (see also Schedules 2 and 3 in section 7), have been identified as the most suitable for built waste management facilities.. The Priority Areas are being put forward as they comply with the NLWP Spatial Principles which is reflected in the site and area selection criteria, as well as a range of environmental, social and economic criteria set out in the Sustainability Appraisal Scoping Report. In the absence of the identification of individual sites, the Priority

Areas represent sufficient opportunities to deliver the identified waste management needs of North London over the plan period. In order to ensure that Priority Areas are the focus for new waste capacity, the location of new waste facilities and any compensatory capacity will be monitored through Monitoring Indicator IN3. The aim of the indicator is to check that sites in Priority Areas are being taken up as anticipated and also monitor if land within Schedules 1, 2 and 3 is not available or suitable for new waste facilities. The later aspect in particular will enable the Boroughs and developers to understand where sufficient land remains available and the geographic distribution of new waste facilities, which will inform potential site searches and evidence required by the Boroughs for those seeking planning consent for sites for waste uses. The monitoring will help to demonstrate the progress of the spatial principle for better geographical spread and achievement of the sequential approach to delivery of new waste sites set out in Policies 2 and 3. Any proposals for waste facilities within the Priority Areas will be subject to planning permission.

Figure 11: Priority Areas for new waste management facilities



## The impact of Crossrail 2 and Opportunity Areas on existing sites and Priority Areas

- 5.22 Transport for London has been consulting on Crossrail 2. The timetable for a Hybrid Bill submission is at present unknown. Depending on the route selected, some existing waste sites and areas identified as Priority Areas for new facilities might be affected by the scheme.
- 5.23 At the time of publication, only one location (A02-BA-Oakleigh Road) within an area identified in Schedule 2: Priority Areas for new waste management facilities has been identified in the Crossrail 2 [safeguarding directions](#) issued in January 2015. This plot of land (shown in Appendix 2) has been safeguarded in order to deliver part of the construction of Crossrail 2 and will be released after this is completed. However, as the scheme develops and further information is made available on the preferred route, there could be locations within other Areas, which may be required for the purpose of constructing Crossrail 2, particularly along the West Anglia Mainline. Once known, should applications for waste uses come forward in these locations, they will need to be subject of consultation with TfL and Network Rail as necessary.
- 5.24 Furthermore, a number of the areas identified in Schedule 2 Priority Areas for new waste management facilities are in locations close to Crossrail 2 stations and could make a valuable contribution towards realising the wider benefits of Crossrail 2 in terms of both delivering additional homes and supporting wider regeneration. Those Areas which in part may have such a role in the longer term include:
- A12-EN – Eley’s Estate
  - A22-HR – Friern Barnet Sewage Works
  - A19-HR – Brantwood Road
  - A21-HR – North East Tottenham
- 5.25 Known information on Crossrail2 is detailed further in the Area profiles in Appendix 2 and in the proformas in the Sites and Areas Report.
- 5.26 In line with the NLWP approach to Opportunity Areas and Housing Zones as set out in section 2, any non-waste related development in these locations will need to be brought forward in a way that safeguards existing capacity (see Policy 1) and considers future waste management requirements alongside the need to deliver new homes and more intensive employment uses. Within these locations there is likely to be significant benefit in seeking opportunities to co-locate or consolidate existing waste uses so as to minimise potential conflict and ensure that they can coexist alongside residential and other more sensitive uses.
- 5.27 As required, the North London Boroughs will work proactively with the GLA and TfL to create proposals which address these issues ensuring that North London’s waste

management needs can be met whilst helping to realise the significant opportunities associated with schemes such as Crossrail 2.

- 5.28 How the impact of Crossrail 2 on the NLWP will be monitored and managed is addressed under Indicator IN4 of the monitoring arrangements in section 8.

## 6 Provision for North London's Waste to 2035

- 6.1 Section 4 sets out North London's waste management capacity gap and Section 5 sets out the process of identifying sufficient land to meet that capacity gap. This Section brings this information together to set out how North London's waste management needs will be achieved over the plan period.
- 6.2 The North London Boroughs have developed the following over-arching policy which sets out in broad terms how the waste management needs in North London over the plan period are being planned for.

### Over-arching Policy for North London's Waste

The North London Boroughs will identify sufficient capacity and land for the provision of waste facilities to manage the equivalent of 100% of waste arisings (net self-sufficiency) for Local Authority Collected Waste (LACW) and Commercial & Industrial (C&I) waste and Construction & Demolition (C&D) waste by 2026, including hazardous waste. The North London Boroughs will plan to manage as much of North London's excavation waste arisings within North London as practicable, and to ensure that excavation waste exports are put to beneficial use. To achieve this, the North London Boroughs will plan to manage the quantities of waste set out in Table 5 over the next 15 years.

The North London Boroughs will encourage development on existing sites and in Priority Areas that promotes the movement of waste up the waste hierarchy, increases management of waste as close to the source as practicable, and reduces exports of waste to landfill.

The North London Boroughs will continue to co-operate with waste planning authorities who receive significant quantities of waste exports from North London.

- 6.3 Most of North London's waste capacity need is met through its existing facilities. These existing facilities are safeguarded through London Plan policy, however they are not always in the most sustainable locations. The NLWP seeks to make the most of the existing infrastructure by supporting intensification of existing sites, where appropriate, while enabling relocation to more sustainable locations for replacement capacity (see Policy 1). Existing capacity and additional new capacity will be needed to meet North London's identified need for waste management over the plan period (2020-2035). The Boroughs are seeking a sustainable network of waste facilities which helps reduce movements of waste, including waste exports and increase opportunities for waste to be managed in proximity to its source. Existing waste

capacity in North London is set out in Schedule 1 (see Policy 1 and Appendix 1) and Priority Areas for new waste facilities is set out in Schedules 2 and 3 (see Policy 3). The Priority Areas for new waste capacity represent the most suitable land when assessed against the Spatial Principles, including a better geographical spread, and the assessment criteria detailed in the Section 5. This helps to deliver STRATEGIC OBJECTIVE 2 which seeks to ensure there is sufficient suitable land available to meet North London's waste management needs. The focus for new waste capacity in North London is for recycling and recovery facilities to manage the quantities of waste set out in Table 5, thereby reducing exports. New waste facilities will be assessed against the criteria in Policy 5.

- 6.4 Table 8 sets out the quantities of waste, by waste stream, which need to be managed within North London in order to meet STRATEGIC OBJECTIVE 3 and the policy for net self-sufficiency target for LACW, C&I and C&D waste by 2026, including hazardous waste. Table 5 also takes account of the policy to divert excavation waste away from landfill and towards beneficial use. The quantities of waste take into account population and economic growth and waste targets including net self-sufficiency, apportionment, recycling and landfill diversion, set out in the London Plan. The North London Boroughs are planning to meet more than their apportionment targets and to manage the waste arisings for North London. Further details of the methodology to estimate waste arisings is available in the NLWP Data Study (2019).
- 6.5 The North London Boroughs will monitor the NLWP against the projected quantities of waste generated set out in Table 5, (IN1), new waste management capacity delivered (IN2), , the locations of new waste facilities and compensatory capacity (IN3) and the amount of waste exported (IN7) to ensure the over-arching policy is being delivered. All monitoring indicators are set out in Section 8 of this plan.
- 6.6 The following section sets out how North London's will meet its strategy for waste to 2035 in more detail, setting out each waste stream and management method separately.

#### **Local Authority Collected Waste (LACW) and Commercial & Industrial Waste (C&I)**

- 6.7 Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste streams comprise similar types of waste. Most facilities which manage these waste streams do not differentiate between them and so it is reasonable to group them together when assessing existing capacity and planning for additional capacity.
- 6.8 New There is a capacity gap of up to around 174,500 tonnes for LACW and C&I waste over the plan period. This equates to approximately 1.5 hectares of land,

depending on the technology of the facility/ies. This calculation includes the increase in EfW capacity and the loss of composting capacity at Edmonton EcoPark.

### Recycling/Composting

- 6.9 The North London Waste Authority (NLWA) and seven constituent boroughs are required to prepare a Joint Waste Strategy (JWS) for North London. The most recent JWS came to an end in December 2020. A key element of that strategy has been met through the granting of permission for a replacement energy recovery facility at the Edmonton EcoPark to treat residual waste. A replacement JWS will be developed by NLWA in conjunction with the seven constituent boroughs, but requires a clear position on the circular economy and recycling from central government; it is hoped that this will be within the next year. The new Joint Waste Strategy will focus on activities to move all waste up the waste hierarchy. In the short term, a Residual Waste Reduction Plan has been agreed after consultation with constituent boroughs. This Plan forms a short-term strategic approach from NLWA, which will inform the development of the next Joint Waste Strategy. The NLWA expect a new JWS will be being developed in 2021 and 2022. A new JWS will set out how North London will contribute to the Mayor's recycling targets as set out in the London Plan and London Environment Strategy.
- 6.10 There is a need for additional capacity for recycling for the LACW/C&I waste stream throughout the plan period. LACW and C&I are combined for the purposes of waste planning as many facilities manage both waste streams.
- 6.11 In addition to recycling, the existing composting facility at Edmonton will be displaced due to the development of the new Energy Recovery Facility. The NLWA are not intending to build a replacement facility to meet this requirement. Current contracts exist to export this waste outside the Plan area.
- 6.12 New There is an opportunity to bring forward new LACW waste recycling/composting capacity on the Friern Barnet Pinkham Way site which is owned by the North London Waste Authority, although presently there are no plans to do so. There are also opportunities to bring forward commercial recycling capacity in all but one of the Priority Areas identified in Schedules 2 and 3, and composting capacity on four of the Priority Areas. Additional capacity and recycling rates will be monitored by Monitoring Indicator IN1 and reported in the Annual Monitoring Report.

### Recovery

- 6.13 Most LACW is managed at the Edmonton EcoPark facility which has an existing capacity of around 600,000tpa. In November 2014 the NLWA announced plans for the development of a new Energy Recovery Facility (ERF) - the North London Heat

and Power Project - on their existing site at the Edmonton EcoPark in Enfield. This will replace the existing Energy from Waste (EfW) plant at the EcoPark that is coming to the end of its operational life.

- 6.14 The new Energy Recovery Facility (ERF) will have a capacity of around 700,000 tonnes per annum to deal with all the residual waste under the control of the Authority from 2025 until at least 2050. The replacement facility will generate power for around 127,000 homes and provide heat for local homes and businesses as part of a decentralised energy network known as the Lee Valley Heat Network, trading as energetik.’
- 6.15 Once the new facility has been developed, the existing EfW facility will be demolished. The associated parcel of land, on which the current plant is located, will continue to be safeguarded for future waste use as part of ENF18 in Schedule 1, and will become available towards the end of the plan period. The development of Edmonton EcoPark for the new ERF will provide a strategic facility for the NLWP and provide a solution for managing the non-recyclable element of LACW. Delivery of this facility will see the NLWA continue to manage LACW from the North London Boroughs and help reduce the reliance on disposal of waste to landfill. Enfield Council have adopted Edmonton EcoPark Supplementary Planning Document and are preparing the Central Leaside Area Action Plan, both of which provide more detail on the planning framework and objectives for this site.
- 6.16 As the existing EfW facility at Edmonton does not currently treat C&I waste, it is likely this waste will continue to be exported in the short to medium term until 2025. After this time, the recovery requirement of C&I waste can be met by the new Edmonton ERF to the end of the plan period.
- 6.17 There are opportunities for additional recovery capacity to be brought forward on three of the proposed Priority Areas.

### Transfer

- 6.18 NLWA manage three waste transfer stations in North London namely the Hendon Rail Transfer Station (Barnet), Edmonton EcoPark Transfer Station (Enfield) and the Hornsey Street Transfer Station (Islington). The Hendon Rail Transfer Facility in Barnet is being relocated due to the Brent Cross Cricklewood development and a planning application is currently under consideration for the new location within Barnet.
- 6.19 Many waste transfer facilities also recycle some of the waste they receive. There is opportunity for waste transfer facilities to come forward on nine of the Priority Areas.

Landfill

- 6.20 North London has no landfill sites and depends on capacity outside the Plan area. The NLWA intend to minimise the amount of LACW sent direct to landfill by maximising recycling and ensuring the existing EfW facility can sufficiently manage the expected tonnage of North London's residual waste up to 2025. Much less waste will be exported to landfill from 2017/18 due to changes in contractual arrangements and virtually no LACW will go to landfill by 2026.
- 6.21 It is anticipated that some C&I waste will continue to be exported to landfill throughout the plan period, although this will be a decreasing quantity as new facilities become operational and recycling levels increase.

**Construction, demolition and excavation waste (CD&E)**Recycling

- 6.22 North London has sufficient capacity to manage Construction and Demolition (C&D) waste arising in North London over the plan period. Some exports of excavation waste will continue, but opportunities to manage as much of this waste stream as practicable within North London will be sought.
- 6.23 The majority of C&D waste is recycled on-site or through transfer facilities. Each Borough Local Plan has a sustainable design and construction policy in place which seeks to minimise waste generated during the design and construction of development and re-use or recycling of materials on-site where possible. Recycling rates will be monitored by Monitoring Indicator IN1 and reported in the Annual Monitoring Report.

Landfill

- 6.24 North London has no landfill sites and depends on capacity outside the NLWP area. A reduced amount of the CD&E waste stream will continue to be exported to landfill, but the majority (95%) of C&D waste will be reused, recycled and recovered and the majority of excavation waste (95%) will be put to beneficial use.

**Hazardous Waste**

- 6.25 All the waste streams include some hazardous waste. Some facilities in North London, whilst not classified as hazardous waste management facilities, are permitted to manage a certain amount of hazardous waste alongside non-hazardous wastes. Hazardous waste is more commonly managed in specialist facilities which have and depend on wide catchment areas for their economic feasibility, and may not be local to the source of the waste. Planning for hazardous waste is a strategic

issue (regionally and arguably nationally rather than sub-regional) and it is not anticipated that land for facilities would be identified to meet the requirements of North London alone, though the Priority Areas identified in the NLWP have been assessed for their potential suitability for such facilities.

#### Recycling and Recovery

- 6.26 North London has a number of facilities which manage hazardous waste alongside other non-hazardous waste. The majority of these are vehicle depollution (car breakers) and metal recycling sites. There are also transfer facilities such as RRCs which will accept, for example, paints and batteries which require specialist treatment and disposal. Such sites will continue to make a valuable contribution to managing North London's hazardous waste requirements. The amount of hazardous waste managed in North London varies from year to year with a maximum capacity of around 4,250 tonnes over the last five years.
- 6.27 There is a capacity gap for the management of around 49,000 tonnes per annum, requiring an estimated 4.9ha of land. The North London Boroughs support the provision of such facilities in principle in the Priority Areas and will work with the GLA and other Boroughs across London to meet this need. It is noted in the Area profiles in Appendix 2 of the NLWP where a Priority Area is not suitable for hazardous waste recycling and recovery facilities. Any applications for hazardous waste facilities in North London that do come forward will be considered on a case by case basis. However, in the short term it is likely that hazardous waste will continue to be exported to the most appropriate specialist facilities.

#### Landfill

- 6.28 The need for export to landfill of around 13,000 tonnes per annum, is expected to continue due to inability of the area for provide this type of facility. This reflects the amount of hazardous waste which cannot be recycled or treated, for example asbestos. The North London Boroughs will continue to work with waste planning authorities who receive hazardous waste from North London to identify constraints to the continued export of this waste and identify potential new destinations if necessary.

#### **Agricultural Waste**

- 6.29 The small amount of agricultural waste generated in North London is not expected to increase over the plan period and there is no requirement to plan for additional facilities to manage this waste stream.

### **Low Level Radioactive Waste**

- 6.30 The very small amount of Low Level Non-Nuclear Radioactive Waste (LLW) arising in North London is produced as wastewater and disposed of through foul sewer and it is expected that this will continue. Any more specialist waste which may be produced would need to be managed outside the area in specialist facilities. It is therefore not necessary to plan for additional facilities in North London for this waste stream.

### **Waste Water**

- 6.31 The main Thames Water sewage treatment facility in North London is Deephams Sewage Treatment Works (STW), operated by Thames Water. Work to upgrade this facility was largely completed in 2017. Thames Water anticipates this will provide sufficient effluent treatment capacity to meet its needs into the next decade during the plan period. However, this will be reviewed in future AMP periods to ensure ongoing capacity in relation to changing population growth predictions.. It is therefore not necessary to identify additional land for this waste stream in the NLWP, however any new facility for waste water will be assessed against Policy 7.
- 6.32 Enfield Council will continue work with Thames Water and the Environment Agency to ensure that adequate and appropriate waste water treatment infrastructure is provided. Any new waste water facility will be assessed under Policy 7.

## 7 Policies

- 7.1 The policies set out in this section will form part of each Borough's 'development plan' which also includes the Mayor's London Plan and individual borough Local Plans (see Figure 2). All planning applications for waste uses will be assessed against the following NLWP policies and other relevant policies in the development plan and any associated Supplementary Planning Documents (SPD)/guidance. Any proposals for waste development will be expected to take account of the full suite of relevant policies and guidance.
- 7.2 The NLWP policies will help deliver the NLWP's aim and objectives, Spatial Principles and the Overarching Policy for North London's Waste. The supporting text sets out why the particular policy approach has been chosen, any alternatives considered and how the policy will be implemented.
- 7.3 The policies are:
- Policy 1: Existing waste management sites
  - Policy 2: Locations for new waste management facilities
  - Policy 3: Windfall sites
  - Policy 4: Re-use & Recycling Centres
  - Policy 5: Assessment criteria for waste management facilities and related development
  - Policy 6: Energy recovery and decentralised energy
  - Policy 7: Waste Water Treatment Works and Sewage Plant
  - Policy 8: Control of Inert Waste

### Policy 1: Existing waste management sites

#### Policy 1: Existing waste management sites

All existing waste management sites identified in *Schedule 1: Existing safeguarded waste sites in North London*, and any other sites that are given planning permission for waste use, are safeguarded for waste use.

Expansion or intensification of operations at existing waste sites will be permitted where the proposal is in line with relevant aims and policies in the North London Waste Plan, the London Plan, Local Plans and related guidance.

Applications for non-waste uses on safeguarded waste sites will only be permitted

where it is clearly demonstrated by the developer to the satisfaction of the relevant borough that compensatory capacity will be delivered in line with the spatial principles on a suitable replacement site in North London, that must at least meet, and, if possible, exceed, the maximum achievable throughput of the site proposed to be lost and help to promote the increased geographical spread of waste sites across the plan area.

Development proposals which would prevent or prejudice the use of existing waste sites for waste purposes will be resisted under the agent of change principle unless design standards or other suitable mitigation measures are adopted to ensure that the amenity of any new residents would not be significantly adversely impacted by the continuation of waste use at that location or suitable compensatory provision has been made for the waste use elsewhere within the Plan area.

**This policy helps meet strategic objectives SO2 and SO3**

**This policy contributes towards Spatial Principles A and C**

- 7.4 The purpose of Policy 1 is to ensure that the existing waste capacity in North London is protected and is able to expand where appropriate. It applies to sites with existing operational waste facilities, and any other sites developed for waste use throughout the plan period. The safeguarding of waste sites for waste use does not preclude waste operators from moving and selling their site as a waste site.
- 7.5 *Schedule 1: Existing safeguarded waste sites in North London* is in Appendix 1. The London Plan requires boroughs to protect their existing waste capacity and each North London Borough is safeguarding this land through their Local Plan and Policies Map. The contribution currently made by these facilities, and their future contribution, is taken into account in the estimation of how much additional waste management capacity is needed throughout the plan period, so it is important to protect these existing facilities to ensure there is sufficient capacity available to meet identified needs over the plan period. If existing facilities were lost and the capacity not replaced elsewhere in North London, this would result in additional waste capacity being required to meet the identified need and achieve net self-sufficiency.
- 7.6 Some existing waste sites may have the potential to increase their capacity, or provide additional waste services; planning applications for such changes will be permitted where they are in alignment with policies in this Plan and with Borough Local Plans.
- 7.7 If, for any reason, an existing waste site is to be lost to non-waste use, compensatory waste capacity will be required. Compensatory capacity must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the

maximum achievable throughput of the site proposed to be lost. When assessing the throughput of a site, the maximum throughput achieved over the last five years should be used. This information is sourced from the Environment Agency's Waste Data Interrogator. It is the responsibility of the developer to demonstrate that replacement capacity has been provided. Where this information is not available, for example if a waste site has been vacant for a number of years, the potential capacity of the site should be calculated using an appropriate and evidenced throughput per hectare. Applicants will need to demonstrate that provision of replacement capacity is secured before permission is granted for an alternative use. This could be through a compensatory site of a suitable size to meet at least the maximum annual throughput or an increase of capacity in an existing facility. Boroughs may consider using conditions or s106 agreements to satisfy themselves that compensatory capacity will be delivered. It may not be necessary for replacement sites to be on a 'like for like' basis, for example, a new site with a larger capacity might replace a number of sites with individually smaller, but combined equivalent, capacity.

- 7.8 Compensatory provision should be delivered in accordance with the spatial principles and such proposals will need to demonstrate compliance with Policy 2 (Priority Areas for new waste management facilities), Policy 3 (Windfall sites) and Policy 5 (Assessment Criteria for waste management facilities and related development) of the NLWP. Compensatory capacity should be provided within North London unless the NLWP Monitoring Report demonstrates that waste capacity in North London is sufficient to meet net self-sufficiency for LACW, C&I and C&D waste, including hazardous waste (Table 6). If sufficient capacity has been achieved in North London, compensatory capacity should be provided elsewhere in London. If it can be demonstrated that there is sufficient capacity in London to meet London's apportionment and net self-sufficiency targets, it may be possible to justify the release of waste sites for other uses. During the Plan period, where waste sites shown in Schedule 1 are redeveloped for other uses, the amount and location of compensatory provision will be noted in the NLWP AMR (see IN2 in section 8). Sites which are going to be redeveloped for other uses during the plan period are identified in Schedule 1 and should be excluded from the search criteria for potential sites for new or replacement waste facilities.
- 7.9 As set out within Section 2, a key Spatial Principle of the NLWP is to establish a geographical spread of waste sites across North London, consistent with the principles of sustainable development. The aim is to ensure that waste is managed efficiently and as close to its source as possible whilst minimising any negative cumulative impacts resulting from a high concentration of waste facilities. Avoiding an unduly high concentration of waste facilities in a location is consistent with the overarching objectives of sustainable development, identified within the NPPF and would leave land available for other uses. Policy 2 identifies the Priority Areas for

new waste management facilities and a sequential approach to site selection. The most suitable location for the re-provision of a site lost to non-waste development may therefore not necessarily be within the same north London borough as the displaced site. Adequate evidence of compensatory provision will be required to the satisfaction of the local planning authority before planning permission for redevelopment proposing loss of a facility is granted.

- 7.10 Any sites that come forward and receive planning permission for waste development which are implemented in the lifetime of the NLWP will be regarded as existing waste sites in North London and safeguarded under the provisions of this Policy (1). As part of the monitoring of the plan, waste arisings (IN1) the tonnage of waste capacity available by management type and type of wastes handled (IN2) and the loss of existing waste capacity and provision of replacement capacity (IN4), will be monitored (see section 8). The most up-to-date list of existing waste management sites will be found in the NLWP AMR. Where existing waste sites are lost, but compensatory provision has been made to the satisfaction of the Borough, this will be noted in the AMR. In time, the safeguarded designation will be removed from the relevant Borough's policies map.
- 7.11 Policy 1 also seeks to protect existing and permitted waste sites from the influence of an incompatible use in close proximity prejudicing the continuation or further development of waste operations at that location. Waste facilities have an important role to play in ensuring that communities are sustainable. Identifying and safeguarding suitable sites for waste facilities is challenging with issues relating to public amenity, access, hydrology, and geology, amongst others, to consider. In addition, waste is a relatively 'low value' land use which, although capable of competing with other industrial type uses, cannot outbid higher value uses. The introduction of sensitive types of development nearby, such as housing, could have an adverse impact on the continued operation of the existing sites in North London and their ability to provide sufficient waste capacity as well as helping meet waste recycling, diversion and recovery targets. This would undermine the anticipated capacity of the network of existing facilities across North London to manage waste and consequently the overall deliverability of the NLWP. The NPPF and the London Plan sets out the 'Agent of Change' principle. This principle places the responsibility of mitigating the impact of noise, dust, vibration and other nuisance-generating activities (from existing noise-generating businesses) on the proposed new development. Developers proposing non-waste development in close proximity to existing waste sites should be aware of the potential impacts on existing waste operations and plan this into their development so as not to prevent or prejudice the continued waste use in that location, otherwise such developments will not be permitted. Accordingly proposed non-waste developments should be designed to

protect both the amenity of potential new residential developments and the existing waste operation within that area.

- 7.12 Some existing waste sites may be having an adverse impact on surrounding uses such as schools and residential areas. The waste operator is responsible for ensuring that its regulated facility does not cause pollution of the environment and harm to human health. The operator’s performance in relation to that responsibility is assessed by checking compliance with the terms and conditions of the permit. Environmental permits are issued by either the Environment Agency for large-scale facilities and those with greater risk to the environment (known as “A1 installations”) or the local authority for smaller-scale facilities with lower risk to the environment (which include “A2 installations” and “Part B installations”) . Local authorities hold a register of these permits which are available to view on request.
- 7.13 The responsibility for checking compliance falls to the issuer of the permit (the regulator). The Environmental Permitting Regulations (EPR) place a duty on regulators to undertake appropriate periodic inspections of regulated facilities. The EPR are the basis for any enforcement action and the principal offences are:
- operating a regulated facility without a permit;
  - causing or knowingly permitting a water discharge activity or groundwater activity without a permit; and
  - failing to comply with a permit condition, flood risk activity emergency works notice, flood risk remediation notice or an enforcement-related notice.
- 7.14 Operator competence can be considered by the regulator at any time, whether as part of the determination of an application or at any time during the life of the permit. The regulator can suspend or revoke the permit if an operator fails to comply with the conditions of the permit, risking harm to the environment or human health.
- 7.15 The North London Boroughs will monitor any enforcement action taken against waste operators (IN6) to ensure that existing waste facilities do not cause harm to the environment or local communities. This will be published as part of the NLWP Annual Monitoring Report. Any additional information on enforcement action can be requested from the regulator.

**Policy 2: Priority Areas for new waste management facilities**

**Policy 2: Priority Areas for new waste management facilities**

Areas listed in *Schedule 2: Priority Areas for waste management* and *Schedule 3: Priority*

*Areas identified in LLDC Local Plan* are identified as suitable for built waste management facilities to meet the identified need set out in Tables 5 and 7.

To help meet the spatial principle to create a better geographical spread of waste facilities in North London, developers should first seek sites in Priority Areas outside Enfield, and must demonstrate that no sites are available or suitable before considering sites within Enfield's Priority Area.

Applications for waste management development will be permitted on suitable land within the Priority Areas identified in Schedule 2 subject to other policies in the North London Waste Plan, the London Plan and Local Plans, and related guidance.

Development proposals will need to manage waste as far up the waste hierarchy as practicable. Development proposals for materials and waste management sites are encouraged where they deliver a range of complementary waste management and secondary material processing facilities on a single site.

Applications for waste management development within the Priority Areas identified in Schedule 3 will be assessed by the London Legacy Development Corporation.

**This policy helps meet strategic objectives SO1, SO2, SO3 and SO5**

**This policy contributes towards Spatial Principles B, C and E**

**Table 11: Schedule 2 Priority Areas for waste management**

Area ref	Area Name	Size (ha)	Borough	Waste Facility Type				
				A	B	C	D	E
A02-BA	Oakleigh Road	0.99	Barnet	X		X		X
A03-BA	Brunswick Industrial Park	3.9	Barnet	X				X
A04-BA	Mill Hill Industrial Estate	0.9	Barnet	X				X
A05-BA	Connaught Business Centre	0.9	Barnet	X				X
A12-EN	Eley's Estate	26.1	Enfield	X	X	X	X	X
A15-HC	Millfields LSIS	1.48	Hackney					X
A19-HR	Brantwood Road	16.9	Haringey	X			X	X
A21-HR	North East Tottenham	15.32	Haringey	X			X	X
A22-HR	Friern Barnet Sewage Works/ Pinkham Way	5.95	Haringey	X	X			X
A24-WF	Argall Avenue	26.91	Waltham Forest	X	X			X

**Table 12: Schedule 3 Priority Areas identified in LLDC Local Plan**

Area ref	Area Name	Size (ha)	Borough	Waste Facility Type				
				A	B	C	D	E
LLDC1-HC	Bartrip Street	0.6	Hackney	X				X
LLDC2-HC	Chapman Road (Palace Close)	0.33	Hackney	X				X
LLDC3-WF	Temple Mill Lane	2.1	Waltham Forest	X	X			X

**Table 13: Key to Waste Management Facility Type**

	Facility type
A	Recycling
B	Composting (including indoor / in-vessel composting)
C	Integrated resource recovery facilities / resource parks
D	Waste recovery or treatment facility (including thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment)
E	Waste transfer

- 7.16 National and European requirements state that waste plans must identify locations where future waste development may take place. In addition, the London Plan requires boroughs to allocate sufficient land to provide capacity to manage apportioned waste. These Priority Areas have been assessed against national, regional and local criteria, including the Strategic Objectives and Spatial Principles, and represent the most suitable areas for new waste facilities in North London. To help redress the high proportion of North London's waste facilities already in Enfield (62%), and help deliver a better geographical spread of sites (Spatial Principle B), developers wishing to provide additional waste capacity on a new site in North London are required to demonstrate that no land is available or suitable in Priority Areas outside of Enfield before considering the Priority Area identified within the Borough. This applies to additional capacity only and not to the expansion or intensification of existing waste sites or providing compensatory capacity for sites already in Enfield. The exception to this sequential approach to site search. The exception to this sequential approach to site search is for Recycling and Reuse Centres (RRCs) where there is an identified need in Enfield and Barnet to improve the coverage across North London (see Policy 4). The evidence will need to demonstrate an adequate search has been undertaken which takes into account the type of waste facility proposed, the criteria set out in Table 10 and the criteria set out in policy 6.
- 7.17 The NLWP data study has identified capacity gaps for waste management during the plan period for the preferred option of net self-sufficiency (in line with STRATEGIC OBJECTIVE 3). The purpose of Policy 2 is to ensure that sufficient land is identified to

accommodate built waste management facilities to deal with these identified capacity gaps for North London (in line with STRATEGIC OBJECTIVE 2).

- 7.18 In Schedules 2 and 3, the NLWP identifies thirteen Priority Areas to provide land suitable for the development of waste management facilities, including RRCs (see Policy 4). Each 'Priority Area' comprises an industrial estate or employment area that is in principle suitable for waste use. The identification of Priority Areas suitable for waste uses, subject to detailed site assessment at planning application stage, will help to achieve net self-sufficiency whilst encouraging co-location of facilities and complementary activities (an objective of the NPPW and Spatial Principle C). Areas listed in Schedule 2: Priority Areas for waste management and Schedule 3: Priority Areas identified in LLDC Local Plan suitable for new waste facilities will be identified in borough policies maps, and any new waste sites will be safeguarded and identified in borough policies maps.
- 7.19 The Priority Areas are considered to be in the most suitable, sustainable and deliverable locations in North London for new waste management facilities when assessed against a range of environmental, economic and social factors (see STRATEGIC OBJECTIVE 5) and the Spatial Principles. The location of new waste facilities and compensatory capacity will be monitored through Monitoring Indicator IN3.
- 7.20 Area profiles in Appendix 2 are provided to assist developers who wish to build a waste facility in North London. The Profiles indicate the size of each Priority Area, the type of facility likely to be accommodated on the area, constraints, and any mitigation measures which may be required. Developers should be aware that any type of facility listed as potentially suitable is subject to consideration against the full suite of relevant local planning policies/guidance.
- 7.21 The ability of Priority Areas to accommodate a range of types and sizes of waste management facility is important to the flexibility of the Waste Plan. Table 13: Key to Waste Management Facility Types contains a full list of the types of facilities which were considered when assessing Areas and which may be required over the plan period to meet the identified capacity gap and to provide new sites for compensatory capacity. The facility types identified are broad categories which may come forward over the plan period. The order of facility types reflects their place in the waste hierarchy, with categories A and B at the 'recycling' level and C-E at the 'other recovery' level. Applicants should take account of this order when responding to the second criteria of Policy 2 which requires development proposals to manage waste as far up the waste hierarchy as practicable in line with STRATEGIC OBJECTIVE 1.

- 7.22 The NLWP recognises that currently emerging or unknown waste management technologies, not listed in Table 13 'Key to Waste Facility Types', may be proposed during the plan period as new ways of treating waste come to the fore. As with all proposals, those for waste management technologies not listed will be assessed against the relevant NLWP policies, policies in the London Plan, Borough Local Plan policies and related guidance.
- 7.23 A full assessment of the suitability of the Priority Area for a facility type should be prepared by the developer to inform any development application for waste use. This will allow for a more detailed analysis and consideration of potential impacts associated with a specific proposal at the planning application stage.
- 7.24 In North London the most likely options for waste management will be recycling and recovery. The test of whether the proposed management is acceptable in terms of the waste hierarchy will be based on the type of waste and the treatment proposed and demand.
- 7.25 It is not within the remit of the NLWP to directly allocate sites/areas within the London Legacy Development Corporation (LLDC) planning authority area; this falls to the LLDC Local Plan. Therefore Schedule 3 sets out separately those Priority Areas identified in the LLDC Local Plan as being potentially suitable for built waste management facilities.

**Policy 3: Windfall Sites**

**Policy 3: Windfall Sites**

Applications for waste development on windfall sites outside of the existing sites and Priority Areas for new waste management facilities identified in Schedules 1,2 and 3 will be permitted provided that the proposal can demonstrate that:

a)the sites and Priority Areas identified in Schedules 1, 2 and 3 are not available or suitable for the proposed use or the proposed site would be better suited to meeting the identified need having regard to the Spatial Principles;

New) sites have first been sought outside Enfield before sites within Enfield were considered, and that no sites outside Enfield are available or suitable, in line with Spatial Principle B;

b)the proposed site meets the criteria for built facilities used in the site selection process (see Table 10 of Section 5 of the NLWP) the proposal fits within the NLWP Spatial Principles, and contributes to the delivery of the NLWP aim and objectives;

c)future potential development including Opportunity Areas identified in the London Plan, and transport infrastructure improvements such as West Anglia Main Line, Four Tracking and Crossrail 2 would not be compromised by the proposals,;

d)it is in line with relevant aims and policies in the NLWP, London Plan, Opportunity Area Planning Frameworks, Local Plans and related guidance; and

e)waste is being managed as far up the waste hierarchy as practicable

**This policy helps meet strategic objectives SO2 and SO3**

**This policy contributes towards Spatial Principles B and C**

7.26 The purpose of this policy is to ensure that development for new waste facilities on sites which do not form part of the planned strategy in the NLWP make a positive contribution to managing waste in North London. Windfall sites refer to locations which are not identified in Schedules 1-3 of this Plan. Windfall sites will cater for the needs of new waste facilities as well as those of displaced facilities lost under proposals considered under Policy 1. Windfall sites will also need to comply with Policy 5 which applies to all proposed waste developments.

7.27 The search process for suitable potential locations for waste facilities has been extensive, thorough, and subject to public consultation, Equality Impact Assessment (EQIA), Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA). The Priority Areas identified in Schedules 2 and 3 meet the requirements of the Spatial Principles. However, there remains a possibility that sites not identified in the plan i.e. windfall sites may be brought forward by operators or landowners for waste development over the plan period.

- 7.28 Developers of windfall sites are required to demonstrate why it is not possible to use, expand or intensify an existing waste site set out in Schedule 1 or why sites in the Priority Areas in Schedules 2 and 3 are not available or suitable. In addition, to help address concerns that there is a high proportion of North London's waste facilities already in Enfield, and help deliver a better geographical spread of sites (Spatial Principle B), developers are required to demonstrate that no sites are available or suitable outside of Enfield before considering those within the Borough. The exception to this is for Recycling and Reuse Centres (RRCs) where there is an identified need in Enfield and Barnet to improve the coverage across North London (see Policy 4). The evidence will need to demonstrate an adequate search has been undertaken which takes into account the type of waste facility proposed, the criteria set out in Table 10 and the criteria set out in policy 6.
- 7.29 Developers proposing waste sites outside the Priority Areas will be expected to demonstrate that the proposed site would be better suited to meeting the identified need for North London having regard to delivering the Spatial Principles of the NLWP. For example a windfall site may deliver a better geographic spread of facilities in North London (Spatial Principle B), or there may be an opportunity to co-locate a recycling facility with a reprocessing plant (Spatial Principle C) or an opportunity for small scale expansion of an existing site onto adjacent land which helps facilitate the maximum use of an existing waste site and enable co-location of facilities. There may be instances in the future where advances in waste technologies are such that existing sites or Priority Areas do not meet the technical requirements of a proposed waste management facility, for example, the identified locations might be too small for the proposed development or the facility may need to be located near a specific waste producer or user of heat. Some of the Priority Areas identified in Policy 2 may become unavailable over the Plan period because they will be used for other purposes or affected by future development proposals such as Crossrail 2 and Opportunity Areas. Locating certain types of waste processing sites within large scale redevelopment areas may also have benefits for reducing need for waste transport especially during the construction phase for the management of CDE. In addition, it is also recognised that proposals on windfall site may come forward to provide capacity for displaced facilities from within the plan area where existing capacity needs to be re-provided locally and this need cannot be met through the existing allocations.
- 7.30 Proposals for waste development on windfall sites will be supported where the proposal would not compromise existing planning designations and where the impacts on communities and environment can be satisfactorily controlled. In proposing a windfall site, developers will need to demonstrate that the spatial principles set out in Section 2 have been considered, and in particular that the proposed site can deliver the spatial principle of balanced geographical distribution

of waste facilities across North London, taking into account the concentration of existing waste sites in Enfield with reference to the NLWP Annual Monitoring Report..

- 7.31 Proposals for waste development on windfall sites should be in line with the London Plan, the NLWP, and Local Plans adopted by the North London boroughs. Proposals for waste facilities on windfall sites will need to demonstrate compliance with the same planning and spatial assessment criteria (Table 10, section 5) used for the identification of sites and areas in the NLWP, and any other relevant material considerations, including the assessment criteria as set out within policy 5. The windfall sites policy has been developed to ensure that any unplanned development contributes positively to future waste capacity in the plan area while not undermining the approach to development set out in the NLWP, the London Plan and Local Plans. Any waste development brought forward on a windfall site must meet the same high level of sustainability as the Priority Areas identified through the site and area selection process.
- 7.32 Applications for waste developments on windfall sites will need to demonstrate how the application supports delivery of the NLWP and assists in the aim of net self-sufficiency (STRATEGIC OBJECTIVE 3) by providing capacity that addresses the requirements of North London to manage more of its own waste or in providing replacement capacity for an existing facility which has been displaced. In line with the aim and objectives of the plan, planning applications will need to demonstrate that there will be social, economic and environmental benefits from the development and that amenity will be protected (STRATEGIC OBJECTIVE 5).
- 7.33 Historically, waste development has been concentrated within the east and west of North London. Policy 3 provides an opportunity to develop a wider network of sites across the area, in line with the Spatial Principles. This policy allows new sites to come forward across the area where demand and commercial opportunity arise helping to provide a wider spread of facilities across the plan area in future.
- 7.34 There will be mixed use developments across North London within the period of the NLWP. The London Plan sets out a framework for development of new housing and employment together with the ancillary development necessary to sustain that development. Crossrail 2 will impact considerably on north London as mixed use development is expected to accumulate around Crossrail 2 stations.
- 7.35 In large scale redevelopment areas across the boroughs there is opportunity to plan for waste uses to form part of the master-planning process. In this way it should be possible to design-out any potential land use conflicts with non-waste uses in close proximity and support the agent of change principle as promoted by the London Plan. In such areas it may also be beneficial to allow temporary sites that can

manage CDE waste generated as part of the redevelopment, subject to licencing and planning requirements.

7.36 In areas which contain a mixed use of employment and housing, suitable waste uses are likely to be re-use, repair or recycling uses. The following issues need special considerations when designing waste facilities into a mixed use area as part of the master planning process.

- How to minimise visual and acoustic nuisance from the site to residential properties and other uses, including utilising suitable screening , building orientation including avoiding residential units overlooking waste operations or vehicle site access points, and use of appropriate building materials.
- Impact of odour, dust, litter on local amenity – An Environmental Management Plan to be submitted in support of a planning application to be applied to prevent such impacts from becoming a nuisance;
- Access and traffic – consider the most appropriate route and timing for vehicles to access the waste facility and separation of access to avoid conflict with traffic and access associated with neighbouring uses.

These issues are considered in more detail in policy 5 including a presumption that waste uses will be enclosed.

7.37 STRATEGIC OBJECTIVE 1 seeks to support movement of North London’s waste as far up the waste hierarchy as practicable. The test of whether the proposed operations are acceptable in terms of the waste hierarchy will be based on the type of waste and the treatment proposed and demand.

**Policy 4 – Re-use & Recycling Centres**

**Policy 4 – Re-use & Recycling Centres**

Proposals for Re-use & Recycling Centres will be permitted where:

- a) They improve the coverage of centres across the North London Boroughs, in particular in an area of identified need for new facilities in Barnet or Enfield and;
- b) They are in line with relevant aims and policies in the North London Waste Plan, London Plan, Local Plans and other related guidance.

**This policy helps meet strategic objectives SO1, SO2 and SO3**

**This policy contributes towards Spatial Principles A and B**

7.38 Re-use & Recycling Centres (RRCs) provide members of the public with access to a wider range of recycling facilities and they also deal with bulky items. There are currently eight RRCs in North London of which seven are the responsibility of the North London Waste Authority (NLWA). They are safeguarded for waste use under Policy 1. The NLWA has identified areas of deficiency in coverage in parts of Barnet and Enfield and is seeking to address this by providing new or replacement sites so that 95% of residents live within two miles (measured as a straight line) of a facility<sup>18</sup> - see Figure 7 in Section 4. The NLWA is also proposing a new RRC on the Edmonton EcoPark site as part of its current Development Consent Order (DCO) application on the site. The Spatial Principles seeks a network of waste sites across North London and, as part of this aim, to ensure residents have good access to RRCs where there is an identified need.

7.39 Re-use & Recycling Centres should be located where they can provide appropriate access for members of the public and for contractors and their vehicles. They are best sited on former waste sites or in areas of industrial or employment land and need to be of a sufficient size for the range and quantity of materials likely to be received. Sites and areas identified in Schedules 1, 2 and 3 are likely to be the most suitable locations, and Policy 3: Windfall Sites will apply to any application for an RRC outside of these areas. There may be scope to provide localised recycling centres as part of major new development.

**Policy 5: Assessment Criteria for waste management facilities and related development**

**Policy 5: Assessment Criteria for waste management facilities and related development**

Applications for waste management facilities and related development, including those replacing or expanding existing sites, will be required to demonstrate to the satisfaction of the relevant Borough that:

- a) the amenity of local residents is protected;

New) the proposal maximises the waste management capacity of the site

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<sup>18</sup> Household Waste Recycling Centre Policy, North London Waste Authority (June 2010)

- b) the facility will be enclosed unless justification can be provided by the developer that an equivalent level of protection can be permanently achieved by other means;
- c) adequate means of controlling noise, vibration, dust, litter, vermin, odours, air and water-borne contaminants and other emissions are incorporated into the scheme;
- d) there is no significant adverse effect on any established, permitted or allocated land uses likely to be affected by the development;
- e) the development is of a scale, form and character in keeping with its location and incorporates appropriate high quality design;
- f) there is no significant adverse impact on , open spaces or land in recreational use or landscape character of the area including the Lee Valley Regional Park;
- new) heritage assets and their settings are conserved and where appropriate enhanced;
- g) active consideration has been given to the transportation of waste by modes other than road, principally by water and rail;
- h) there are no significant adverse transport effects outside or inside the site as a result of the development;
- i) the development avoids increasing the levels of vulnerability to climate change, makes appropriate adaptation and mitigation measures to achieve this, and helps reduce greenhouse gas emissions;
- j) the development has no adverse effect on the integrity of an area designated under the Habitats Directive and no significant adverse effect on local biodiversity or water quality;
- k) there will be no significant impact on the quality of underlying soils, surface or groundwater;
- l) the development has no adverse impact on Flood Risk on or off site and aims to reduce risk where possible;
- m)
- n) there is no adverse impact on health
- o) there are no significant adverse effects resulting from cumulative impact of any proposed waste management development upon amenity, the economy, the natural and the built environment either in relation to the collective effect of different impacts of an individual proposal, or in relation to the effects of a number of waste

<p>developments occurring concurrently or successively.</p> <p>p) There are job creation and social value benefits, including skills, training and apprenticeship opportunities<sup>19</sup>.</p> <p>q) The proposal is supported by a Circular Economy Statement</p>
<p><b>This policy helps meet strategic objectives SO4, SO5, SO7 and SO8</b></p> <p><b>This policy contributes towards Spatial Principles C, E and F</b></p>

7.40 Policy 5 seeks to ensure that the construction and operation of waste facilities does not give rise to an unacceptable impact on health or harm the **amenity** of local residents or the environment. Amenity is defined as any element providing positive attributes to the local area and its residents and impacts can include such issues as, but not limited to, increased levels of local air pollution, increased noise disturbance, light impacts including increased light or reduced light or sunlight, reduced privacy, loss of outlook and reduced visual amenity. Applicants will need to demonstrate that appropriate measures and/or Best Available Techniques (BAT) (where applicable ) have been taken to minimise any potential impacts from the proposed waste development to ensure the protection of local amenity and healthy. The specific requirements will vary from site to site, however issues to be addressed may include strict hours of operation, effective cladding on buildings to prevent noise pollution, and dust and odour suppression systems as appropriate. These issues are discussed in more detail below. Policy 5 helps deliver a number of the STRATEGIC OBJECTIVES, including SO4 which seeks high standards of design, SO5 which seeks to integrate social, environmental and economic considerations, SO6 which seeks a low carbon economy, SO7 which supports the use of sustainable forms of transport, and SO8 which seeks to protect the natural environment, biodiversity, cultural and historic environment.

7.41 London Plan policy SI8 promotes capacity increases at waste sites and where appropriate to maximise their use. In order to demonstrate that North London’s

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<sup>19</sup> This requirement is an issue for all development and waste applications should provide details as to how they will meet these objectives.

land is being used to its highest potential, developers are required to provide evidence that the waste management capacity on a site has been optimised. This could be in reference to similar facilities operating to a high standard.

- 7.42 Waste facilities can be separated into '**enclosed**' facilities, where waste is processed inside a building and 'open' facilities, which largely deal with waste in the open air. Waste facilities are often seen as bad neighbours, due to problems associated with open air facilities. It is current best practice that the operations are carried out within a covered building enclosed on all vertical sides with access and egress points covered by fast acting doors which default close in order to minimise local public health and environmental impact. Such enclosed facilities are similar in appearance to modern industrial shed developments such as factories or logistics facilities. 'Open' facilities are unlikely to be suitable for North London as outlined in the section 2 of the Plan except in exceptional circumstances. There are types of waste development for specific waste streams or waste types that may not need to or should not be enclosed but any activity likely to cause dust should be carried out within a building or enclosure. Enclosing waste management facilities not only results in less dust and particulate pollution but will also reduce the risk of pollution caused from other amenity issues such as noise, pests and odour. **Noise, vibration, dust, litter, vermin, odours, air and water-borne contaminants**, other emissions and their potential health impacts have been a major concern raised through public consultation. However, well sited, and well managed facilities should not cause harm or disturbance. Details of controls for emissions (including bio aerosols) from the site need to be supplied with the application. Planning conditions and section 106 agreements will be used to secure measures to address any issues where necessary and where control is not already exercised through other consent regimes (i.e. the requirement for environmental permits, which is assessed by the Environment Agency). Applicants will be expected to comply with Borough policies on contaminated land. The North London boroughs require that any development can safely complement surrounding uses.
- 7.43 The North London boroughs expect well controlled and well-designed waste facilities capable of fitting in with **surrounding land uses** and acting as good neighbours. Where development is proposed close to residential areas, in line with STRATEGIC OBJECTIVE 4 and the agent of change principle, the design must incorporate noise reduction measures as well as dust and odour suppression as necessary. It should be designed to minimise its impact on the local area and ensure it is compatible with existing surrounding land uses. When assessing planning applications for waste uses, in addition to Policy 5, the boroughs will also have regard to the criteria in Appendix B of the NPPW and relevant London Plan and Local Plan policies. Applicants are required to submit sufficient information to enable the waste planning authority within which the subject site falls to assess the potential impact of the development

proposal on all interests of acknowledged importance. Applicants are encouraged to contact the relevant borough prior to submitting a planning application to discuss relevant matters. Where new waste development is being sited near existing waste sites, developers will be expected to consider potential cumulative impacts as well as also demonstrating any possible benefits of co-locating waste development (in line with Spatial Principle C). **Good design** is fundamental to the development of high quality waste infrastructure and, to deliver STRATEGIC OBJECTIVE 4, the North London boroughs seek approaches that deliver high quality designs and safe and inclusive environments. The documents submitted in support of the planning application should set out how the development takes on board good practice such as the Defra/CABE guidance on designing waste facilities<sup>20</sup>. The supporting documents should set out how the siting and appearance complements the existing topography and vegetation. Materials and colouring need to be appropriate to the location. The development should be designed to be in keeping with the local area and include mechanisms for reducing highway deposits<sup>21</sup>, noise and other emissions where necessary.

- 7.44 The supporting documents should set out how landscape proposals can be incorporated as an integral part of the overall development of the site and how the development contributes to the quality of the wider urban environment. The applicant will need to demonstrate that there will be no significant adverse effect on areas or features of landscape or nature conservation value. Where relevant, applications for waste management facilities and related development will be required to demonstrate that they conserve and, where appropriate, enhance heritage assets and their settings including consideration of non-designated archaeology where relevant line with the NPPF.
- 7.45 Where sites include, or are likely to have an impact on the setting of a **heritage** asset both designated (Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, Registered Historic Parks and Gardens and Battlefields) and undesignated, including archaeology, it should be demonstrated that the development will conserve the significance of the asset. Where the site has potential to include assets with archaeological interest, such as if it is in an archaeological area

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<sup>20</sup> Designing waste facilities – a guide to modern design in waste, Defra & CABE, 2008

<sup>21</sup>This can be achieved through provision of wheel wash facilities etc where required and placing conditions of the applications to ensure all vehicles are covered

identified in a Borough Local Plan or may affect a site recorded on the Greater London Historic Environment Record, an appropriate desk based assessment and, where necessary, a field evaluation, is required to accompany the planning application. Where such an assessment and evaluation confirms significant archaeological interest then appropriate mitigation by design or investigation is also required.

- 7.46 A large part of the Lee Valley Regional Park (1483 ha) falls within four of the North London Boroughs involved in the Plan; Waltham Forest, Haringey, Enfield and Hackney. New development should contribute to the protection, enhancement and development of the Regional Park as a world class visitor destination and the wider public enjoyment of its leisure, nature conservation, recreational and sporting resources. The Lee Valley is a significant resource for North London and developments should not have an adverse effect on the **open space** and character of the area, and should aim to contribute to its enhancement where appropriate.
- 7.47 Waste and recyclables require transportation at various stages of their collection and management and so opportunities to employ more sustainable options such as rail and river should be fully considered. STRATEGIC OBJECTIVE 7 supports the use of sustainable forms of transport and minimise the impacts of waste movements including on climate change. North London is characterised by heavy traffic on all principal roads. That is why developers need to prioritise **non-road forms of transport** if at all possible and to set out their assessment of sustainable transport options in a Transport Assessment detailing transport issues to be submitted with any planning applications for waste facilities (see below). In North London there exists considerable potential for sustainable transport of waste as part of the waste management process. There are a number of railway lines and navigable waterways in North London including the Regents Canal and the Lee Navigation. It is existing practice to transport waste by train and pilot projects have taken place to transport waste by water. Developers are required to demonstrate that they have considered the potential to use water and rail to transport waste before reliance on transport of waste by road. Where the site lies adjacent to a wharf or waterway, capable of transporting waste, developers need to demonstrate that consideration has been given to the provision and/or enhancement of wharf facilities. This will be monitored through Monitoring Indicator IN5 (see Section 8). Waste transfer activities that do take advantage of rail and or boat transportation must also ensure that they design their site and meet the standards required by all waste management sites stated in this Plan.
- 7.48 Applicants will need to submit a **Transport Assessment** in line with the relevant borough Local Plan policy and the London Plan. The Transport for London Best Practice Guide contains advice on preparing Transport Assessments when they are required to be submitted with planning applications for major developments in

London. Consideration should be given to access arrangements, safety and health hazards for other road users, the capacity of local and strategic road networks, impacts on existing highway conditions in terms of traffic congestion and parking, on-site vehicle manoeuvring, parking and loading/unloading areas, and queuing of vehicles. The Assessment should include a traffic management plan establishing the times of access for vehicles to minimise disruption on the local road network during peak hours, and setting out specific routes to ensure that vehicles are accessing the site via roads considered suitable by the Highways Authority and, where possible, avoid overlooking of the site access by residential properties. The Assessment should cover the types of vehicles to be used, including opportunities to use ultra-low and zero emission vehicles, alternatives to vehicles powered by the internal combustion engine, and the provision of any infrastructure at future or expanded waste sites to accommodate this. The statement should also cover emission standards and fuel types in line with national and regional air quality standards.

- 7.49 The development of Servicing and Delivery Plans and Construction Logistic Plans (CLP) will be encouraged for all waste developments. Such Plans ensure that developments provide for safe, efficient and legal delivery and collection, construction and servicing including minimising the risk of collision with vulnerable road users such as cyclists and pedestrians. Consideration should be given to the use of Direct Vision Lorries for all waste vehicles in line with the Mayor's Vision Zero Action Plan, and the use of freight operators who can demonstrate their commitment to TfL's Freight Operator Recognition Scheme (FORS) or similar. Developers need to demonstrate that they can operate servicing and deliveries in the most efficient way that makes best use of transport movements that are made.
- 7.50 Sustainable design, construction and operation of waste management development will be assessed against relevant Development Plan policies. In line with STRATEGIC OBJECTIVE 6, consideration should be given to how the development contributes to the mitigation of and adaption to **climate change**, promotes energy and resource efficiency during construction and operation with the aim of developments being carbon neutral, the layout and orientation of the site and the energy and materials to be used. Developments should achieve the highest possible standard under an approved sustainability metric such as BREEAM or CEEQUAL in line with the relevant borough's policies. Information supplied should enable the borough in question to assess the proposal against relevant planning policies by clearly setting out how the application complies with sustainable design and construction policies and guidance including measureable outputs where appropriate. Where appropriate, production of a site waste management plan should be provided prior to the commencement of construction of the development.
- 7.51 Criteria 5j seeks to protect and enhance local **biodiversity**. Development proposals will be assessed against this policy as well as other relevant principles and policies

set out in the NPPF and Borough Local Plans. Development that would have an adverse effect on any area designated under the Habitats Directive will not be permitted. Assessments undertaken for the Plan have identified sites of European Community importance within and nearby the Plan area. Sites at least partially within the Plan boundary are the Lee Valley Special Protection Area (SPA) and RAMSAR site and part of Epping Forest Special Area for Conservation (SAC). Additional sites at least partially within 10 km of the Plan area boundary are Wormley-Hoddesdon Park Woods SAC and Wimbledon Common SAC<sup>3</sup>. Developers need to be able to demonstrate that their proposals will not have an adverse effect on the integrity of any European site. In addition there are six Sites of Special Scientific Interest and 20 Local Nature Reserves as well as sites of importance to nature conservation (SINC). Developers should take note of existing Biodiversity Action Plans, protect existing features and promote enhancement for example through the use of green walls where acoustic barriers are required. Where a development site is adjacent to a river the Environment Agency has advised that a setback of a minimum of 8 metres from the top of the bank should be incorporated into any redevelopment proposals. Consistent with this advice, setting back waste management development (not including wharf development) from watercourses and providing an undeveloped buffer zone free from built structures will be important for maintaining access to the river, to allow the landowner access for routine maintenance activities and for the Environment Agency to carry out Flood Defence duties. Maintaining a sufficient wildlife and riverside corridor is also important for minimising the potential adverse impacts to the **water quality** and riverine habitats. This will provide opportunities for flood risk management in line with the Environment Agency Catchment Flood Management Plans. Opportunities for river restoration through the development of sites should also be encouraged to ensure compliance with requirements under the Water Framework Directive and the Thames River Basin Management Plan.

7.52 There are a number of **groundwater** source protection zones in North London to protect drinking water supplies and prevent contamination of aquifers. Source protection zone 1 boundaries are defined in the immediate area of boreholes and other abstraction points. Waste facilities may be permitted in source protection zone 1 provided that any liquid waste they may contain or generate or any pollutants they might leach, especially if hazardous, do not pose an unacceptable risk to groundwater. A groundwater risk assessment will be required. Soil quality will need to be protected from potential adverse impact by certain operations, such as open windrow composting. The following waste facilities are considered lower risk and are more likely to be acceptable:

- Energy from Waste ;
- In-Vessel Composting activities;

- Mechanical Biological Treatment;
- Materials Recycling Facility (dry wastes only), and;
- Waste Electrical and Electronic Equipment (WEEE) sites that exclude potentially polluting wastes.

- 7.53 Higher risk waste uses are less likely to be acceptable in source protection zone 1. Early liaison with the Environment Agency is encouraged.
- 7.54 Source protection zone 2 covers a wider area around an abstraction point. Where developments are proposed in source protection zone 2, a risk assessment will be required and any waste operation apart from landfill may be considered. Where sites are in source protection zones, developers are encouraged to engage in early discussions with the Environment Agency.
- 7.55 The North London Strategic Flood Risk Assessment (SFRA) and individual borough 'Level 2' SFRAs have demonstrated the current risks from **flooding** from all sources of flood risk across North London and site specific flooding assessments have been undertaken on Priority Areas in schedules 2 and 3. Where a site is near or adjacent to areas of flood risk, the development is expected to contribute through design to a reduction in flood risk, making as much use as possible of natural flood management techniques, and be appropriately flood resistant and resilient in line with the NPPF and NPPG. Development proposals will be required to assess the impact of climate change using the latest published climate change allowances, mitigate to the appropriate future flooding scenario using these allowances. A sequential approach to the layout of the site should be taken aiming to locate development in the parts of the site at lowest risk of flooding from any source. Waste facilities are often characterised by large areas of hardstanding for vehicles and large roof areas. Development proposals will be required to show that flood risk would not be increased as part of the scheme and, where possible, will be reduced overall through the use of Sustainable Drainage Systems (SuDS) and other techniques. Any proposed development should be reviewed by the Environment Agency at an early stage to discuss the reduction of flood risk on the site.
- 7.56 Developers of waste facilities will need to fully identify the **health implications** of the development and plan the most appropriate scheme to protect the surrounding uses and community. Any proposed waste development which is required to have an Environmental Impact Assessment will also require a Health Impact Assessment.
- 7.57 Paragraph 5 of the National Planning Policy for Waste (NPPW) requires consideration be given to:

*“The cumulative effect of existing and proposed waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential”.*

- 7.58 **Cumulative impacts** relate to the way in which different impacts can affect a particular environmental resource or location incrementally, for example, combined noise, dust and traffic emissions on a dwelling from a new road scheme. In essence, cumulative impacts are those which result from incremental changes caused by other past, present or reasonable foreseeable actions together with the proposed development. Therefore, the potential impacts of the proposed development cannot be considered in isolation but must be considered in addition to impacts already arising from existing or planned development.
- 7.59 In determining an application for a new waste facility, account will normally be taken of the potential cumulative impact of waste management and other development within the locality and in particular the area’s capacity to absorb that change. Factors to be taken into account will include; the nature of the waste and the process involved; the direction of the prevailing wind; the amount of enclosure for the processes; use of odour neutralisation and minimisation; measures for dust control; the number of persons affected by the development and its duration; the effects on amenity that pollution would cause; local topography providing natural screening; the extent of noise and vibration generated by the operations; the proposed hours of working; and the impact of flood-lighting. In some instances, the combined impact of development over a sustained period of time may be sufficient to warrant refusal of planning permission. However it is acknowledged that cumulative impacts can have positive impacts through synergies with other local waste uses and businesses in the area. Such synergies may lead to less road miles for waste as well as the potential development of green industry hubs attracting more highly skilled and technical jobs. Proposals should seek to make a positive contribution to improving issues of deprivation and inequality within local communities. Where an area has historically hosted significant waste infrastructure and is moving towards regeneration initiatives to improve its economic and investment potential, the cumulative impact on these regeneration activities should be considered when waste development is proposed, especially where the benefits of co-location and economies of scale are outweighed by a resultant reduction in land values, employment opportunities and regeneration potential. In these circumstances where development takes place, opportunities to address inequalities should be taken up in order to promote a better spatial distribution of facilities and avoid undue concentration of waste uses.
- 7.60 As stated throughout this document applications will be assessed against the full suite of relevant **national, London Plan and Local Plan policies** and guidance. However, given the status of the NLWP as a multi-Borough DPD which will form part

of the Local Plan of each of the seven Boroughs, Policy 5 is a valuable signpost to impacts that will be considered in the determination of applications and will help deliver STRATEGIC OBJECTIVE 5 which seeks to ensure the delivery of sustainable waste development within the Plan area through the integration of social, environmental and economic considerations.

- 7.61 As part of the application, and in line with policies in the borough local plan, Developers should give details of the jobs created as a result of the new development, the level of skills required and the availability of **training and apprenticeship** opportunities. Developers should seek to meet the aspirations of borough economic and employment strategies and make a positive contribution to the local economy.
- 7.62 As part of the Circular London programme, LWARB published a **Circular Economy** Route Map in June 2017. The Route Map recommends actions for a wide range of stakeholders, including London’s higher education, digital and community sectors as well as London’s businesses, social enterprises and its finance sector. Developers should submit a Circular Economy Statement in line with the London Plan and guidance issued by the Mayor.

**Policy 6: Energy Recovery and Decentralised Energy**

**Policy 6: Energy Recovery and Decentralised Energy**

Where waste cannot be managed at a higher level in the waste hierarchy waste developments are required to generate energy, recover excess heat and provide a supply to networks including decentralised energy networks unless it is not technically feasible or economically viable to do so. Developers must demonstrate how they meet these requirements as part of a submitted Energy Statement .

Where there is no available decentralised energy network and no network is planned within range of the development, as a minimum requirement the proposal should recover energy through electricity production and be designed to enable it to deliver heat and/or energy and connect to a Decentralised Energy Network in the future.

**This policy helps meet strategic objectives SO1 and SO6**

**This policy contributes towards Spatial Principle D**

- 7.63 Tackling climate change is a key Government priority for the planning system and a critical new driver for waste management. The purpose of this policy is to ensure that applications for waste management facilities incorporate opportunities for sustainable energy recovery and combined heat and power (CHP) where feasible and practicable. The policy helps deliver STRATEGIC OBJECTIVE 6 to provide opportunities for North London to contribute to the development of a low carbon economy and decentralised energy. The policy complements more detailed policies in borough Local Plans on financial contributions relating to feasibility, sustainable design, CHP and development of heat networks, against which applications will also be considered.
- 7.64 The NPPW and the London Plan both recognise the benefits to be gained from any energy from waste facility to capture both heat and power, and encourage all developments of this kind to achieve that end.
- 7.65 National policy for renewable energy says that Local Development Documents, such as the NLWP, should contain policies that promote and encourage, rather than restrict, the development of renewable energy resources. The London Plan includes minimum performance for technologies for generating energy from London's waste, known as the carbon intensity floor. This has been set at 400 grams of CO<sub>2</sub> eq generated per kilowatt hour (kwh) of electricity generated.
- 7.66 The GLA has committed to working with London Boroughs and partners in the private sector to develop opportunities by providing assistance for commercialisation of large decentralised energy projects. Opportunities for district heating were identified across London as part of the Decentralised Energy Master Planning programme led by the GLA in 2008-2010<sup>22</sup>. The programme initially focused on identifying opportunities for district heating networks through heat mapping and energy masterplanning with the London Boroughs.
- 7.67 Work is already underway to progress the delivery of a decentralised network in the Lee Valley known as Meridian Water . Meridian Water will capture affordable low carbon heat from waste to energy facilities and combined heat and power plants, supplying it to buildings and industry across the Lee Valley. Meridian Water is

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<sup>22</sup> London Heat Map – [www.londonheatmap.org.uk](http://www.londonheatmap.org.uk)

requesting hot water to be supplied for the energy from waste facility (EfW) at Edmonton EcoPark. However, over time, the network will connect additional heat sources, including other waste developments, elsewhere in the Lee Valley. Any future development, including the current plan for Meridian Water should ensure that the openness and permanence of the Green Belt is maintained in accordance with draft New London Plan Policy G2.

- 7.68 The Boroughs will monitor the success of this policy through Monitoring Indicator IN8 which is the number of new CHP facilities serving district heat networks in which the principal fuel source is residual waste or recovered waste fuel.

**Policy 7: Waste Water Treatment Works and Sewage Plant**

**Policy 7: Waste Water Treatment Works and Sewage Plant**

Proposals for the provision of new facilities for the management, treatment and disposal of wastewater and sewage sludge will be permitted, provided that:

- it is demonstrated that there is an identified need for such a facility within the North London Waste Plan area, which cannot be met through existing waste facilities; and
- the proposals meet the other policies of this North London Waste Plan together with all other relevant policies of the appropriate borough's Development Plan.

**This policy helps meet strategic objectives SO1, SO2 and SO5**

**This policy contributes towards Spatial Principles A and B**

- 7.69 Waste Water Treatment Works in North London are operated by Thames Water, with the main facility being Deephams Sewage Treatment Works (STW), which is the ninth largest in England. Works to Deephams STW to provide sufficient capacity to meet Thames Water's projections of future requirements into the next decade were largely constructed by March 2017 and being completed during 2018/2019. The upgrade increased capacity from a Population Equivalent (PE) of 891,000 (as at 2011) to 989,000 PE. At the time the upgrade was designed (in line with population predictions at the time) it was envisaged the upgrade will accommodate population growth up until at least 2031. However, treatment capacity will be reviewed in

future AMP periods to ensure ongoing capacity in relation to changing population growth predictions.

- 7.70 The Environment Agency has issued a significantly tighter environmental permit that came into force in March 2017 and required Thames Water to make improvements to the quality of the discharged effluent. The need for an effluent upgrade to Deephams STW is highlighted in the National Planning Statement on Waste Water, and planning permission for this work was granted by Enfield Council in 2015. The site is to be retained for waste water use and Thames Water anticipates that the approved recent upgrade to Deephams STW will provide sufficient effluent treatment capacity to meet their needs into the next decade.
- 7.71 The boroughs will work with Thames Water and the Environment Agency to ensure that adequate and appropriate waste water treatment infrastructure is provided to meet environmental standards and planned demand. In September 2014 the Government approved plans to build the Thames Tideway Tunnel - a 25km conduit flowing beneath the Thames which would provide collection, storage and transfer capacity for waste water and rainwater discharge from a significant part of Central London. Construction is scheduled to begin in 2018 with completion scheduled for 2023. Once completed the new tunnel will be connected to the Lee Tunnel which will transfer sewage to the expanded Beckton Sewage Treatment complex. The proposal has indirect implications for the Plan area in that it will benefit from the additional capacity and this will relieve pressure for further expansion of local Waste Water Treatment Works.
- 7.72 Any other new waste water and sewage treatment plants, extensions to existing works, or facilities for the co-disposal of sewage with other wastes will be supported where the location minimises any adverse environmental or other impact that the development would be likely to give rise to, and the suitability of the site can be justified in accordance with this Plan. The Plan has a supporting role to identify suitable locations for additional infrastructure.
- 7.73 The Boroughs will monitor the success of this policy through Monitoring Indicator IN9.

**Policy 8: Inert Waste**

**Policy 8: Inert Waste**

**Inert waste should be managed as far up the waste hierarchy as possible, including on-site recycling and reuse of such material.**

Proposals for development using inert waste will be permitted where the proposal is for beneficial use, including but not limited to:

- a) Restoring former mineral working sites; or
- b) Facilitating an improvement in the quality of land; or
- c) Facilitating the establishment of an appropriate use in line with other policies in the Local Plan; or
- d) Improving land damaged or degraded as a result of existing uses and where no other satisfactory means exist to secure the necessary improvement.

All proposals using inert waste should:

- a) Incorporate finished levels that are compatible with the surrounding landscape. The finished levels should be the minimum required to ensure satisfactory restoration of the land for an agreed after-use; and
- b) Include proposals for high quality restoration and aftercare of the site, taking account of the opportunities for enhancing the overall quality of the environment and the wider benefits that the site may offer, including biodiversity enhancement, geological conservation and increased public accessibility.

Proposals for inert waste disposal to land will not be permitted if it can be demonstrated that the waste can be managed through recovery operations.

**This policy helps meet strategic objectives SO1, SO2 and SO3**

**This policy contributes towards Spatial Principles B**

7.74 Construction, demolition and excavation waste is largely made up of inert construction waste, such as bricks and hardcore which can be used in site restoration and land reclamation projects.

7.75 Recycling and reuse of inert waste applications for all types of development should demonstrate that viable opportunities to minimise construction and demolition waste disposal will be taken, making use of existing industry codes of practice and protocols, site waste management plans and relevant permits and exemptions issued by the Environment Agency.

7.76 Inert waste materials can be an important resource and should be used for beneficial purposes, such as the restoration of mineral sites and in engineering works, or at other 'exempt sites' rather than disposed of at inert landfill sites. A definition of 'beneficial uses' can be found in the New London Plan. Increased use of recycled and

secondary aggregates can reduce the need and demand for primary aggregates extraction. Site operators will need to conform to the 'Aggregates from inert waste Quality Protocol' document to achieve 'end of waste' status. If this cannot be achieved and/or the operator cannot prove compliance with the protocol, then the material will not have achieved 'end of waste' status and will still be considered a waste and subject to controlled waste legislation. There is no 'end of waste' criteria for soil so this will always be viewed as a waste once it has become a controlled waste outside of the Definition of Waste Code of Practice.

- 7.77 Inert waste will continue to be deposited to land where it is reused for beneficial purposes, including within engineering schemes, for the restoration of mineral workings, and for agricultural improvement. Recycling and recovery are the preferred methods of management and inert waste should only be disposed of to land as a last resort, consistent with the waste hierarchy (see STRATEGIC OBJECTIVE 1).
- 7.78 Proposals on unallocated sites for the recycling of inert waste will be permitted where it can be demonstrated that there is a market need, consistent with the principle of net self-sufficiency.
- 7.79 There should be a clear benefit or benefits from the proposed development. This should be a benefit to the site itself, for example, the use of residual inert material associated with the restoration of an active or dormant mineral working the restoration of a former mineral working to agriculture or an engineering operation for the provision of a new leisure facility. However, given the likely disturbance to local communities and the local environment, for example, due to the movement of HGVs, there should be benefits for the wider area, for example, through environmental improvement or the creation of new public rights of way.

## 8 Monitoring and Implementation

### Monitoring the Plan

- 8.1 The Planning and Compulsory Purchase Act (2004) requires planning authorities to monitor and report annually on whether the Aims and Objectives of all local plans (whether prepared individually or in conjunction with other authorities) are being achieved (paragraph 35). The NPPW identifies the need to monitor and report on the take-up of sites in Priority Areas; changes in the available waste management capacity as a result of closures and new permissions; and the quantities of waste being created locally and how much is being managed at different levels in the waste hierarchy i.e. recycling/composting, recovery, and disposal.
- 8.2 Monitoring is also required to check on whether the intending policy outcomes of the NLWP are being delivered and whether the identified capacity gaps are being met through the Priority Areas listed in Policy 2 Schedules 2 and 3. Monitoring will also ensure that sufficient identified land remains available for new facilities during the plan period which is also likely to see intense competition for land for other uses especially housing. The results of monitoring will also play an important role in informing Development Management decisions when authorities determine planning applications for new waste facilities.
- 8.3 Responsibility for monitoring lies with the individual boroughs. However, the boroughs have agreed to monitor the Plan jointly through a lead borough agreement. Data will be collated and included in a joint NLWP Monitoring Report which will be produced annually.
- 8.4 To supplement the boroughs' annual monitoring, it will be important for the GLA to monitor London Plan waste Policies and gather data in partnership with the boroughs on waste arisings, waste management capacity, both within London and landfill outside of London.

### Proposed monitoring framework

- 8.5 The aim of monitoring is to check whether the policy framework in the NLWP is working as intended. The proposed monitoring indicators reflect a number of National Indicators and also the statutory and non-statutory performance targets including those set by the EU, the Waste Policy for England and the London Plan. The list of indicators is not intended to be exhaustive and is intentionally focused on parameters where it is possible to evaluate the effect of the NLWP. For example, an indicator reporting on the number of times air quality thresholds were exceeded is of

little use if the contribution of waste management facilities and transport of waste cannot be differentiated from those of other activities.

- 8.6 Table 14 sets out the monitoring indicators proposed for each policy in the NLWP and identifies targets where appropriate. In some cases it will only be necessary to monitor (i.e. count the number of instances of) what has happened in the preceding year. In line with statutory requirements, the North London boroughs will review the plan every five years. If any targets are not being met the boroughs will assess where changes can and should be made.

Table 14: NLWP Monitoring Indicators

	Indicator	Target(s)	What it monitors	Outcome(s) sought
IN1	Waste arisings (Table 6) by waste stream and management route	Waste arisings and management in line with forecasts in Table 6 (Baseline Table 3)	Strategic Aim (capacity supply and self-sufficiency) Strategic Aim (move waste up Waste Hierarchy) SO1 (resource efficiency) SO3 (net self-sufficiency) Meeting Future Requirements as specified in the NLWP % waste diverted and % landfilled	To check that the NLWP is planning for the right amount of waste
IN2	Waste management capacity (Table 8) by waste stream and management route, including existing capacity, new capacity, loss of capacity, compensatory capacity and capacity gaps	Capacity to meet net self-sufficiency targets in Tables 6 and 8 Zero loss_of capacity Replacement; within North London Replacement capacity for Brent Cross Cricklewood provided within Barnet	Strategic Aim (capacity supply and self-sufficiency) Strategic Aim (move waste up Waste Hierarchy) SO1 (resource efficiency) SO3 (net self-sufficiency) Meeting Future Requirements as specified in the NLWP	To check that capacity is increasing to meet net self-sufficiency targets Ensure that capacity is replaced locally unless net self-sufficiency has been met

	Indicator	Target(s)	What it monitors	Outcome(s) sought
			Policy 2: Priority Areas for new waste management facilities Policy 3: Windfall Sites Policy 4. Reuse and Recycling Centres Policy 7 Waste Water Treatment Works and Sewage Plant Policy 8 Control of Inert Waste	
IN3	Location of new waste facilities and compensatory capacity	Land within Schedules 1, 2, 3	SO2 (capacity provision) Policy 1: Existing waste management sites Policy 2: Priority Areas for new waste management facilities Policy 3: Windfall sites	To check that sites in Priority Areas are being taken up as anticipated. To monitor if land within Schedules 1, 2 and 3 is not available or suitable for new waste facilities.
IN4	Sites in Schedule 1 and Priority Areas in Schedules 2 and 3 lost to other non-industrial uses through a major regeneration scheme or designated for non-industrial uses in a review of the London Plan or Local Plan	Less than 25% of land lost If 50% of land is lost this will trigger review of plan	Policy 2: Priority Areas for new waste management facilities	To check that identified land is sufficient to deliver the plan's aims To ensure sufficient existing capacity remains for managing the levels of waste expected across North London over the plan period as set out in Table 8.
IN5	The number of sites consented that offer non-road transport options, the	Facilities where non-road forms of	SO5 (sustainability) SO7 (sustainable	Reduce impact on climate change Improve amenity

	<b>Indicator</b>	<b>Target(s)</b>	<b>What it monitors</b>	<b>Outcome(s) sought</b>
	number of those sites where such options have been implemented and the total tonnage transported through non-road options (where known).	transport are used to move waste and recycling	transport) Spatial Principle F (sustainable transport)	
IN6	Enforcement action taken against waste sites by the local authority and/or Environment Agency on breach of planning conditions or environmental permit	Zero	SO5 (sustainability) SO8 (protect the environment) Spatial Principles (Reduce impact on amenity) Policy 5: Assessment Criteria for waste management facilities and related development	To ensure sites do not cause harm to the environment or local communities
IN7	Amount of waste imported and exported by waste stream and management route	Exported waste to landfill in line with Table 6 of the NLWP Reduction in waste exports	Net self-sufficiency Changes to imports and exports	Waste exports are in line with those estimated in the NLWP and through the duty to co-operate
IN8	Number of new CHP facilities serving district heat networks in which the principal fuel source is residual waste or recovered waste fuel	Monitor only	Strategic Aim (green London)	Monitor only
IN9	Sufficient infrastructure in place for management of waste water	Monitor only – information to be obtained from Thames Water	Strategic Aim (capacity supply and self-sufficiency) SO5 (sustainability)	To ensure that Thames Water have sufficient capacity to management the levels of waste water generated in North London over the plan period

## Implementing the Plan

- 8.7 Development and adoption of the Plan must be followed by actions by a range of agencies and other organisations to ensure that its Aims and Objectives are met. The section summarises proposals for how these outcomes will be delivered and who will be responsible for them.
- 8.8 Implementation has four components – infrastructure delivery; application of the policies to planning proposals for waste facilities; ongoing regulation and monitoring of the local waste management sector; and achieving performance levels – each of which involves different actors. Table 15 summarises the organisations involved in each component.

**Table 15: Roles and responsibilities involved in implementing the Plan**

Organisation	Role	Responsibilities
Local planning authorities (including London Legacy Development Corporation)	Apply Plan policies	Assessing suitability of applications against Plan policies and priorities  Deliver the strategic objectives and policies of the NLWP alongside wider development and regeneration objectives
	Regulate / monitor	Inspect operating waste sites periodically Appoint a lead borough to monitor the plan and carry out the duty to co-operate when required  Publish annual monitoring reports in the NLWP
	Performance delivery	Support / promote waste reduction initiatives through the planning system
Borough waste collection authorities	Infrastructure delivery	Bring forward new / replacement waste sites for recycling / composting LACW
	Performance delivery	Implement waste collection activities to deliver desired performance levels as appropriate  Support / promote waste reduction initiatives
North London Waste Authority (NLWA)	Infrastructure delivery	Delivery of replacement Edmonton ERF plant

Organisation	Role	Responsibilities
		Delivery of other facilities enabling achievement of desired performance levels
	Performance delivery	Prioritising infrastructure delivery that moves waste up the Waste Hierarchy  Support / promote / deliver waste reduction initiatives
Landowners	Infrastructure delivery	Propose new waste sites in line with NLWP policies that deliver capacity requirements
Waste industry	Infrastructure delivery	Propose new waste sites and deliver new waste facilities in line with NLWP policies that deliver capacity requirements
Environment Agency	Regulate / monitor	Advise on planning applications according to the nature of the proposal  Assess applications for Environmental Permits, issue licences where the proposal meets the necessary standards  Inspect operating waste sites periodically  Collect and publish information about waste movements for use in Plan monitoring  Monitor water quality
	Performance delivery	Promote waste reduction initiatives
Health & Safety Executive	Regulate	Advise on planning applications according to the nature of the proposal  Monitor
Other statutory bodies (e.g. Natural England)	Regulate / monitor	Advise on planning applications according to the nature of the proposal  Monitor protected sites such as SSSI
Greater London	Performance	Promote waste reduction initiatives

Organisation	Role	Responsibilities
Authority	delivery	Promote carbon reduction initiatives
	Apply Plan policies	Assessing suitability of applications against London Plan policies and priorities  Regional coordination of waste planning
London Waste and Recycling Board	Infrastructure delivery	Support to new waste infrastructure
	Performance delivery	Support to waste collection authorities to deliver desired performance levels  Support / promote waste reduction initiatives

8.9 New commercial infrastructure required during the plan period will be funded by private funding through sources that cannot be identified at this time. In addition, there may be other sources of funding available such as public sector borrowing. Facilities required for the management of LACW will be funded by NLWA. The waste industry has been invited to take part in the development of the Plan through involvement in the various consultation processes and calls for them to propose suitable sites for waste management use. The NLWP identifies infrastructure priorities for the next 15 years and this will help to provide the industry with greater certainty about waste management priorities in the North London Boroughs that can inform future investment decisions.

8.10 Table 16 sets out how policies in the NLWP will be implemented and who will be involved in each action and which of the Strategic Objectives are addressed as a result.

**Table 16: How the NLWP policies will be implemented**

Mechanism	Stakeholders involved	Objectives implemented
Policy 1: Existing waste management sites		

<b>Mechanism</b>	<b>Stakeholders involved</b>	<b>Objectives implemented</b>
<p>Planning permission for the expansion or intensification of operations at existing waste facilities.</p> <p>Refusal of planning permission for non-waste use on existing waste sites unless capacity is re-provided.</p> <p>Identifying compensatory provision when it is proposed to redevelop existing waste management facilities for non-waste uses.</p>	Local planning authorities/ Landowner/developers/NLWA	SO2, SO3
<b>Policy 2 Priority Areas for new waste management facilities</b>		
Planning permission and subsequent development	Landowners and developers / waste management companies / NLWA / local planning authorities / Environment Agency and other statutory bodies	SO1, SO2, SO3, SO5
<b>Policy 3: Windfall sites</b>		
Planning permission and subsequent development	Landowners and developers / waste management companies / NLWA / local planning authorities / Environment Agency and other statutory bodies	SO2, SO3
<b>Policy 4: Re-use &amp; Recycling Centres</b>		
Planning permission and subsequent development	Landowners and developers / waste management companies / NLWA / local planning authorities / Environment Agency and other statutory bodies	SO1, SO2, SO3
<b>Policy 5: Assessment criteria for waste management facilities and related development</b>		

Mechanism	Stakeholders involved	Objectives implemented
Planning permission and subsequent development	Local planning authorities / Environment Agency and other statutory bodies	SO4, SO5, S07, S08
Policy 6: Energy recovery and decentralised energy		
Planning permission and subsequent development	Landowners and developers / waste management companies / local planning authorities / NLWA / Environment Agency and other statutory bodies	SO1, SO6
Policy 7: Waste Water Treatment Works and Sewage Plant		
Planning permission and subsequent development	Thames Water / Environment Agency and other statutory bodies / local planning authorities	SO2, SO4, SO5, S08
Policy 8: Inert Waste		
Planning permission and subsequent development	Landowners and developers / waste management companies / local planning authorities / Environment Agency and other statutory bodies	SO1, SO2, SO3, SO5, S08

**Appendix 1: Schedule 1: Existing safeguarded waste sites in North London****Schedule 1: Existing safeguarded waste sites in North London**

Site ID	Site Name	Site Address	Waste Stream	Managed Waste	2012	2013	2014	2015	2016
BAR1	Winters Haulage, Oakleigh Road South	British Rail Sidings, Oakleigh Road South, Southgate, London, N11 1HJ	C&I / CDE	X	10,495	38,503	40,409	35,379	0
BAR 2	Scratchwood Quarry	London Gateway Service Area, M1 Motorway, Mill Hill, London, NW7 3HU	CDE	✓	52,835	71,046	99,060	102,527	131,505

Site ID	Site Name	Site Address	Waste Stream	Managed Waste	2012	2013	2014	2015	2016
BAR 3 ♦ <sup>23</sup>	P B Donoghue, Claremont Rd	3 Shannon Close, Claremont Rd, Cricklewood, London, NW2 1RR	CDE	✓ (96%)	0	118,964	112,449	112,487	111,226
BAR 4 ♦	W R G, Hendon Rail Transfer Station	Hendon Rail Transfer Station, Brent Terrace, Hendon, London, NW2	LACW	X	153,952	164,129	114,457	128,605	142,107

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<sup>23</sup> ♦ These sites will be redeveloped under the planning permission for the regeneration of Brent Cross Cricklewood (Barnet planning application reference F/04687/13). The Hendon Rail Transfer Station (BAR 4) will be replaced with a new facility to meet the NLWA's requirements. Planning permission for the new sites at Geron Way was granted by Barnet Council Planning Committee in September 2018. The existing commercial facilities at BAR 6 and BAR 7 fall within the land required to deliver the early Southern phase of the BXC regeneration which is expected to commence in the near term; replacement capacity for these sites will be sought in accordance with the planning permission for Brent Cross Cricklewood. The BAR3 site is identified for redevelopment in Phase 4 of the BXC regeneration and is currently not anticipated to be redeveloped until after 2026. It is planned that capacity at the waste facilities of BAR4, BAR6 and BAR7 and part of the capacity of BAR3 will be replaced by the new Waste Transfer Station (WTS) delivered as part of the Brent Cross Cricklewood Regeneration. The balance of the replacement capacity for BAR3 will need to be identified prior to its redevelopment and the London Borough of Barnet will seek to provide replacement capacity within the borough with the Local Plan identifying potential sites.

Site ID	Site Name	Site Address	Waste Stream	Managed Waste	2012	2013	2014	2015	2016
		1LN							
BAR 5	Summers Lane Reuse and Recycling Centre	Civic Amenity & Waste Recycling Centre, Summers Lane, London, N12 ORF	LACW	X	15,612	16,361	17,206	10,584	18,237
BAR 6 ♦	Mc Govern Brothers, Brent Terrace, Hendon	26-27 Brent Terrace, Claremont Industrial Estate, Hendon, London, NW2 1BG	C&I / CDE	X	78,488	76,609	78,855	106,206	102,373
BAR 7 ♦	Cripps Skips Brent Terrace	Nightingale Works, Brent Terrace, Claremont Way Industrial Estate, London, NW2 1LR	C&I / CDE	X	9,726	7,719	8,807	9,408	8,910
BAR 8	Apex Car Breakers, Mill Hill	Ellesmere Avenue, Mill Hill, London, NW7 3HB	C&I	✓	182	162	227	256	243
BAR 9	Vacant (previously Savacase Ltd)	Railway Arches, Colindeep Lane, Hendon,	C&I	N/A	0	0	0	0	0

Site ID	Site Name	Site Address	Waste Stream	Managed Waste	2012	2013	2014	2015	2016
		London, NW9 6HD							
BAR 10	G B N Services Ltd, New Southgate	Land/Premises at Oakleigh Road South, Friern Barnet, London, N11 1HJ	CDE	✓ (72%)	14,596	29,938	29,456	31,274	10,746
BAR 11	Upside Railway Yard	Upside Railway Yard, Brent Terrace, Cricklewood, London, NW2 1LN	CDE	X	0	0	0	0	234,930
CAM1	Regis Road Reuse and Recycling Centre	Regis Road, Kentish Town, London NW5 3EW	LACW	X	-	2,535	5,409	5,595	5,119
ENF 1	Crews Hill Transfer Station	Kingswood Nursery, Theobalds Park Road, Crews Hill, Enfield, Middlesex, EN2 9BH	C&I	X	17,466	17,124	19,231	19,507	18,427
ENF 2	Barrowell Green Recycling Centre	Barrowell Green, Winchmore Hill,	LACW	X	10,715	14,556	13,837	11,541	16,923

Site ID	Site Name	Site Address	Waste Stream	Managed Waste	2012	2013	2014	2015	2016
		London, N21 3AU							
ENF 3	Pressbay Motors Ltd, Motor Salvage Complex	Motor Salvage Complex, Mollison Avenue, Brimsdown, Enfield, Middlesex, EN3 7NJ	C&I	✓	63	63	26	29	37
ENF 5	Jute Lane, Brimsdown	Greenwood House, Jute Lane, Brimsdown, Enfield, Middlesex, EN3 7PJ	LACW	✓ (76%)	16,115	11,732	12,659	10,125	15,410
ENF 6	AMI Waste (Tuglord Enterprises)	17 Stacey Avenue, Edmonton, London, N18 3PP	C&I / CDE	X	16,855	27,043	28,566	23,004	21,974
ENF 7	Vacant (formerly Budds Skips) ,	The Market Compound, 2 Harbet Road, Edmonton, London, N18 2HQ	C&I / CDE	-	834	802	1,778	0	0

Site ID	Site Name	Site Address	Waste Stream	Managed Waste	2012	2013	2014	2015	2016
ENF 8	Biffa Edmonton (AKA Greenstar Environmental)	Atlas at Aztec 406, 12 Ardra Road, Off Meridan Way, Enfield, London, N9 0BD	LACW / C&I	✓ (84%)	231,771	72,530	271,888	276,855	270,106
ENF 9	Hunt Skips, Commercial Road, Edmonton	Rear of 160 Bridport Road, Commercial Road, Edmonton, London, N18 1SY	C&I / CDE	✓	9,935	-	20,359	-	8,719
ENF 10	Rooke & Co Ltd, Edmonton	Montague Road Industrial Estate, 22-26 First Avenue, Edmonton, London, N18 3PH	C&I	✓	32,249	24,867	28,095	25,235	3,897
ENF 11	Edmonton Bio Diesel Plant (Pure Fuels)	Unit A8 Hastingwood Trading Estate, Harbet Road, London, N18 3HT	C&I	✓	512	738	895	1,251	-
ENF 12	Camden Plant	Camden Plant, Lower Hall Lane,	CDE	✓	236,950	232,590	241,900	216,334	206,806

Site ID	Site Name	Site Address	Waste Stream	Managed Waste	2012	2013	2014	2015	2016
		Chingford							
ENF 13	Personnel Hygiene Services Ltd, Princes Road, Upper Edmonton	10 Princes Road, Edmonton, London, N18 3PR	C&I	X	0	0	95	1,004	1,081
ENF14	Vacant  (Formerly Lea Valley motors Ltd)	Second Avenue, Edmonton	C&I	N/A	0	0	0	0	0
ENF 15	A & A Skip Hire Limited	Yard 10-12 Hastingwood Trading Estate, Harbet Road, Edmonton, London, N18 3HR	C&I	✓  (89%)	0	0	9,391	16,277	10,696
ENF 17	Albert Works	Albert Works, Kenninghall Road, Edmonton, London, N18 2PD	C&I	✓	193,308	224,020	233,225	211,424	-
ENF18	Edmonton Energy from Waste Facility	Edmonton Ecopark, Advent Way, Edmonton, London, N18 3AG	LACW	✓	546,402	526,829	560,685	550,408	597,134

Site ID	Site Name	Site Address	Waste Stream	Managed Waste	2012	2013	2014	2015	2016
	LondonEnergy Ltd Composting	Edmonton Ecopark, Advent Way, Edmonton, London, N18 3AG	LACW	✓	32,498	32,779	35,241	32,475	33,981
	LondonEnergy Bulk Waste Recycling Facility	Edmonton Ecopark, Advent Way, Edmonton, London, N18 3AG	LACW	X	192,907	190,333	168,121	157,227	198,389
	Ballast Phoenix Ltd	Edmonton Ecopark, Advent Way, Edmonton, London, N18 3AG	LACW	✓	58,255	106,341	112,419	109,114	101,189
ENF 23	J O' Doherty Haulage, Nobel Road, Edmonton	Pegamoid Site, Nobel Road, Edmonton, London, N18 3BH	C&I	✓	85,103	69,124	64,897	77,305	88,636
ENF 24	Oakwood Plant Ltd, Edmonton	Oakwood House, Nobel Road, Eley Industrial Estate,	C&I / CDE	✓	10,282	7,495	10,011	13,489	14,428

Site ID	Site Name	Site Address	Waste Stream	Managed Waste	2012	2013	2014	2015	2016
		Edmonton, London, N18 3BH							
ENF 25	Environcom Ltd (Edmonton Facility) 7	Unit 8a Towpath Road Stonehill Business Park, N18 3QU	Hazardous (WEEE)	✓	2,447	1,327	9,194	11,400	67
ENF 26	Powerday Plant Ltd, Jeffreys Road	Unit 2, Jeffrey's Road, Brimmsdown, Enfield, Middlesex, EN3 7UA	C&I / CDE	✓	27,319	18,664	43,851	23,490	49,754
ENF30	Hunsdon Skip Hire  (Previously L&M Skips and London & Metropolitan Recycling)	Unit 1, 1b Towpath Rd, Stonehill Business Park, London, N18 3QX	C&I / CDE	✓	0	7,150	26,545	15,501	11,337
ENF 31	Volker Highways Ltd	15 Edison Road, Brimmsdown Industrial Estate, Enfield EN3 7BY	C&I / CDE	✓	-	8,892	13,652	7,344	-
ENF 35	Redcorn (ELV)	22a & 24, Stacey Avenue, Montagu Industrial	Hazardous (C&I)	✓	-	-	-	-	6,557

Site ID	Site Name	Site Address	Waste Stream	Managed Waste	2012	2013	2014	2015	2016
		Estate, Enfield, N18 3PS							
ENF37	GBN	Gibbs Road, Montagu Industrial Estate, London, N18 3PU	CDE	✓	-	-	-	-	-
HAC 1	Millfields Waste Transfer & Recycling Facility	Millfields Recycling Facility, Millfields Road, Hackney, London, E5 0AR	LACW	X	18,202	13,935	14,173	16,785	16,725
HAC 2	Downs Road Service Station	1A Downs Road, Clapton, London, E5 8QJ	C&I	✓	177	175	96	101	-
HAR 3	Biffa Waste Services Ltd, Garman Road, Tottenham	81, Garman Road, Tottenham, London, N17 0UN	C&I	✓	28,851	30,355	34,690	33,704	37,454
HAR 4	O'Donovan, Markfield Rd,	100a Markfield Road, Tottenham, London, N15 4QF	C&I / CDE	✓ (50%)	6,316	10,099	11,143	7,035	14,693
HAR 5	Redcorn Ltd, White Hart Lane, Tottenham	44 White Hart Lane,	C&I	✓	15,712	22,733	23,852	8,508	-

Site ID	Site Name	Site Address	Waste Stream	Managed Waste	2012	2013	2014	2015	2016
		Tottenham, London N17 8DP							
HAR 6	Restore Community Projects	Unit 18, Ashley Road, Tottenham Hale, London, N17 9LJ	C&I	✓	24	103	185	278	98
HAR 7	Redcorn Ltd	Brantwood Road, Tottenham, London N17 0ED	C&I	✓	2,470	5,225	2,250	23,779	39,283
HAR 8	O'Donovan, Tottenham	82 Markfield Road, Tottenham, London, N15 4QF	CDE	✓	5,079	27,330	31,460	25,674	123,308
HAR 9	Park View Road Reuse and Recycling Centre	Civic Amenity Site, Park View Road, Tottenham, London, N17 9AY	LACW	X	3,706	2,409	6,326	5,499	5,745
HAR 10	Western Road Re-use & Recycling Centre	Western Road, Haringey N22 6UG	LACW	X	0	0	2,526	4,851	3,799
HAR11	Durnford Street Car Dismantlers & Breakers	6-40, Durnford Street,	C&I	✓	0	0	0	432	288

Site ID	Site Name	Site Address	Waste Stream	Managed Waste	2012	2013	2014	2015	2016
		Tottenham, London, N15 5NQ							
ISL 1	Hornsey Household Re-use & Recycling Centre and Transfer Station	Hornsey Street, Islington London N7 8HU	LACW	X	196,818	195,018	203,919	204,496	212,232
WAF1	Mercedes Parts Centre	21 Chingford Industrial Estate, Hall Lane, Chingford, London, E4 8DJ	C&I	✓	0	0	0	0	7
WAF 2	Kings Road Household Waste Recycling Centre	Civic Amenity Site, 48 Kings Road, Chingford, London, E4 7HR	LACW	X	1,213	881	2,178	2,400	2,853
WAF 3	South Access Road Household Waste Recycling Centre	42a South Access Road, Walthamstow London, E17 8BA	LACW	X	2,917	2,784	6,790	6,949	7,203
WAF 5	Vacant  (previously T J Autos (UK) Ltd)	17 Rigg Approach, Leyton, London, E10 7QN	C&I	✓	53	53	81	21	11
WAF 8	Leyton Reuse & Recycling Centre	Gateway Road, Leyton, London, E10 5BY	LACW	X	2,164	2,255	2,564	3,003	2,589

Site ID	Site Name	Site Address	Waste Stream	Managed Waste	2012	2013	2014	2015	2016
WAF9	Vacant  (formerly B D & G Parts For Rover)	Roxwell Trading Park, Leyton	C&I	-	0	0	0	0	0
WAF 10	Malbay Waste Disposal Ltd, Staffa Road, Leyton	5 Staffa Road, Leyton, London, E10 7PY	C&I / CDE	X	6,700	10,682	12,624	7,339	9,925
WAF 12	Argall Metal Recycling	Unit 1, Staffa Road, E10 7PY	C&I	✓	0	21,537	31,603	30,378	0
WAF 14	Tipmasters	15 Rigg Approach London Greater London E10 7QN	C&I	X	0	0	586	2,847	3,622
WAF16	Whipps Cross Hospital Clinical Waste Treatment Facility	Whipps Cross Hospital, Whipps Cross Road, London, E11 1NR	C&I (clinical)	X	0	0	0	0	5

# North London Waste Plan

## Appendix 2: Area Profiles

November 2021



Schedule 2: Priority Areas for waste management

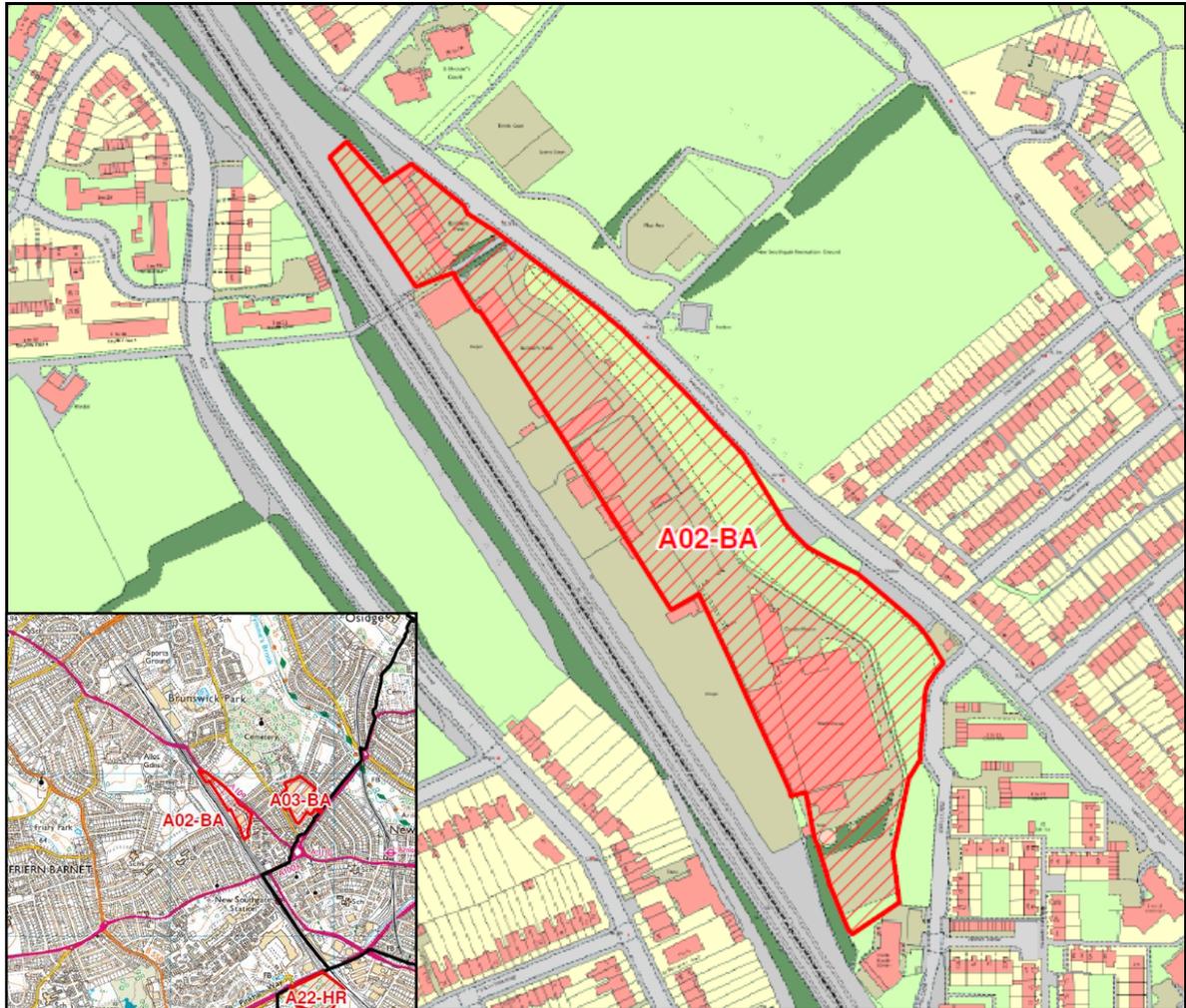
Area ref	Area Name	Borough
A02-BA	Oakleigh Road	Barnet
A03-BA	Brunswick Industrial Park	Barnet
A04-BA	Mill Hill Industrial Estate	Barnet
A05-BA	Connaught Business Centre	Barnet
A12-EN	Eley's Estate	Enfield
A15-HC	Millfields LSIS	Hackney
A19-HR	Brantwood Road	Haringey
A21-HR	North East Tottenham	Haringey
A22-HR	Friern Barnet Sewage Works/ Pinkham Way	Haringey
A24-WF	Argall Avenue	Waltham Forest

Schedule 3: Priority Areas identified in LLDC Local Plan

Area ref	Area Name	Borough
LLDC1-HC	Bartip Street	Hackney
LLDC2-HC	Chapman Road (Palace Close)	Hackney
LLDC3-WF	Temple Mill Lane	Waltham Forest

## A02-BA - Oakleigh Road, Barnet

1:3,550 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)



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### Area Details

<b>Borough</b>	Barnet
<b>Type of Location</b>	Area
<b>Location Reference</b>	A02-BA - Oakleigh Road
<b>Size</b>	3.10 ha
<b>Area Description</b>	Industrial area, includes a builder's depot, a LB Barnet Council depot which contains a waste management element, and two existing waste management facilities.
<b>Description of surrounding uses</b>	Residential properties adjacent to south and north and green space to east and west. Main line railway to the west.

<b>Planning Information</b>	
<b>Planning Designation</b>	Area is designated as a Locally Significant Industrial Site (LSIS). Potential to be safeguarded as a site for Crossrail 2.
<b>Relevant Local Plan Policy</b>	Local Plan Development Management Policy DM14: New and existing employment space
<b>Land Use</b>	
<b>Co-location</b>	Area is suitable for co-location.
<b>Major New Developments</b>	Oakleigh Road is an area of surface interest for Crossrail 2.
<b>Decentralised Energy Network</b>	In proximity to area suitable for Decentralised Energy Network.
<b>Details of in-situ infrastructure</b>	None identified
<b>Constraints</b>	
<b>Flood Risk</b>	Area is within Flood Zone 1 (lowest probability of flooding). Area at risk of surface water flooding.
<b>Surface and Groundwater</b>	Area is not within a Source Protection Zone.
<b>Land Instability</b>	No known issues
<b>Sensitive Receptors</b> (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Residential properties lie approximately 10m south, 20m east and 35m northwest of the area.
<b>Nature Conservation</b>	No issues identified.
<b>Green Belt and Open Space</b>	Metropolitan open space lies approximately 10m east and 45m west of the area.
<b>Historic Environment</b>	Within Watling Street Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.
<b>Highways</b>	Access is suitable for HGV traffic and the area is currently used by commercial vehicles. Given the close proximity of residential properties 24 hour access is unlikely to be suitable.
<b>Conclusion</b>	
<b>Potential Uses</b>	Integrated resource recovery facilities/resource parks, Waste transfer, processing and recycling. The area is not within Source Protection Zone 1 or Flood Zone 3 and is therefore potentially suitable to handle hazardous waste.
<b>Uses unlikely to be suitable</b>	Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.

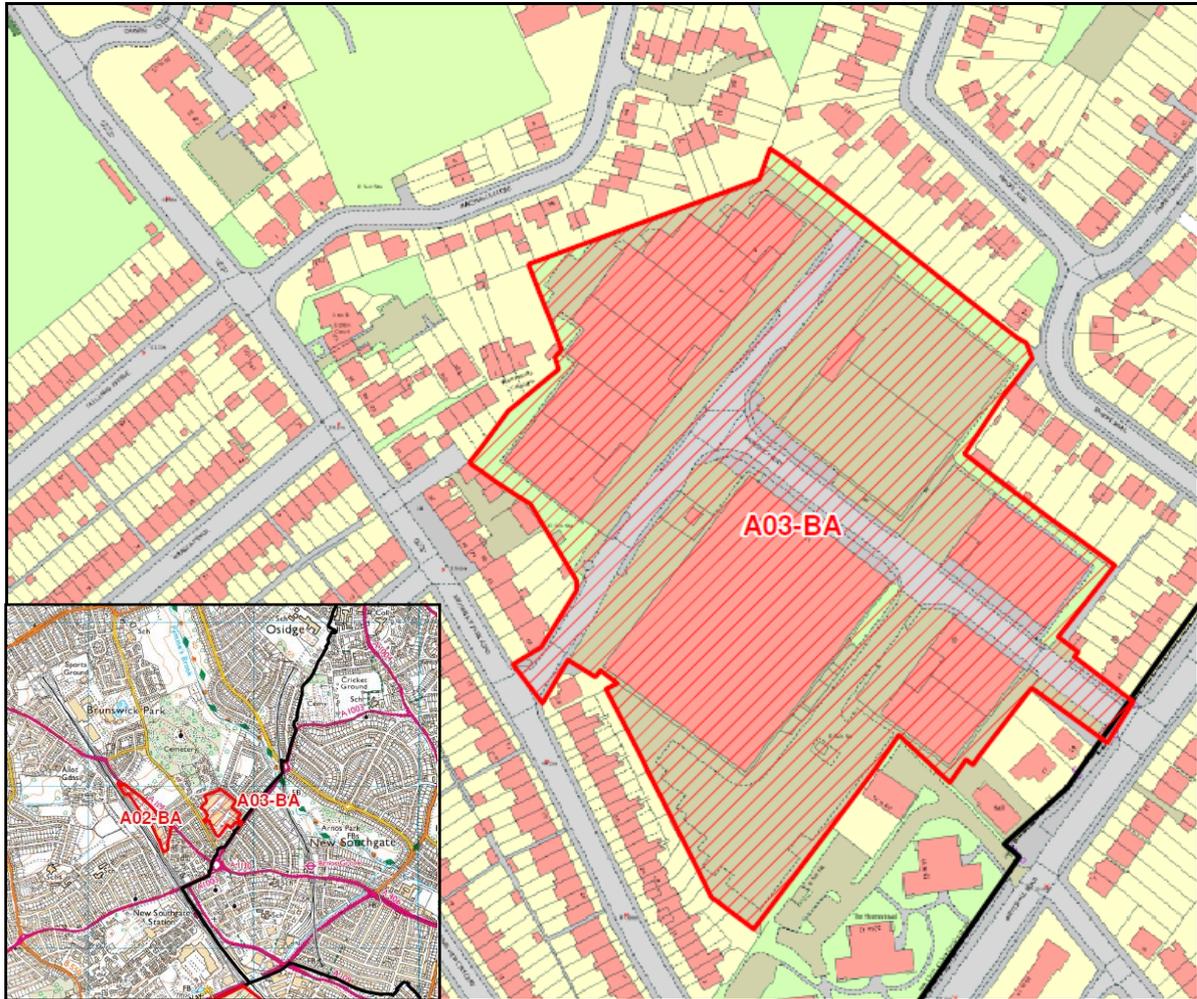
**Potential mitigation measures**

There are a number of environmental and amenity issues facing the area such as the proximity of residential properties and Metropolitan Open Land, as such the area is not suitable for external facilities. Facilities should therefore be enclosed. Key mitigation measures should include dust suppression and other measures such as wheel-washing, negative air pressure and rapid-closure doors. Proposals should also protect the existing green infrastructure or provide appropriate replacement landscaping and/or planting and incorporate appropriate boundary treatments.

As proposals may increase the level of traffic generated within the area a traffic impact assessment should be undertaken.

**A03-BA - Brunswick Industrial Park, Barnet**

**1:2,450 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)**



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**Area Details**

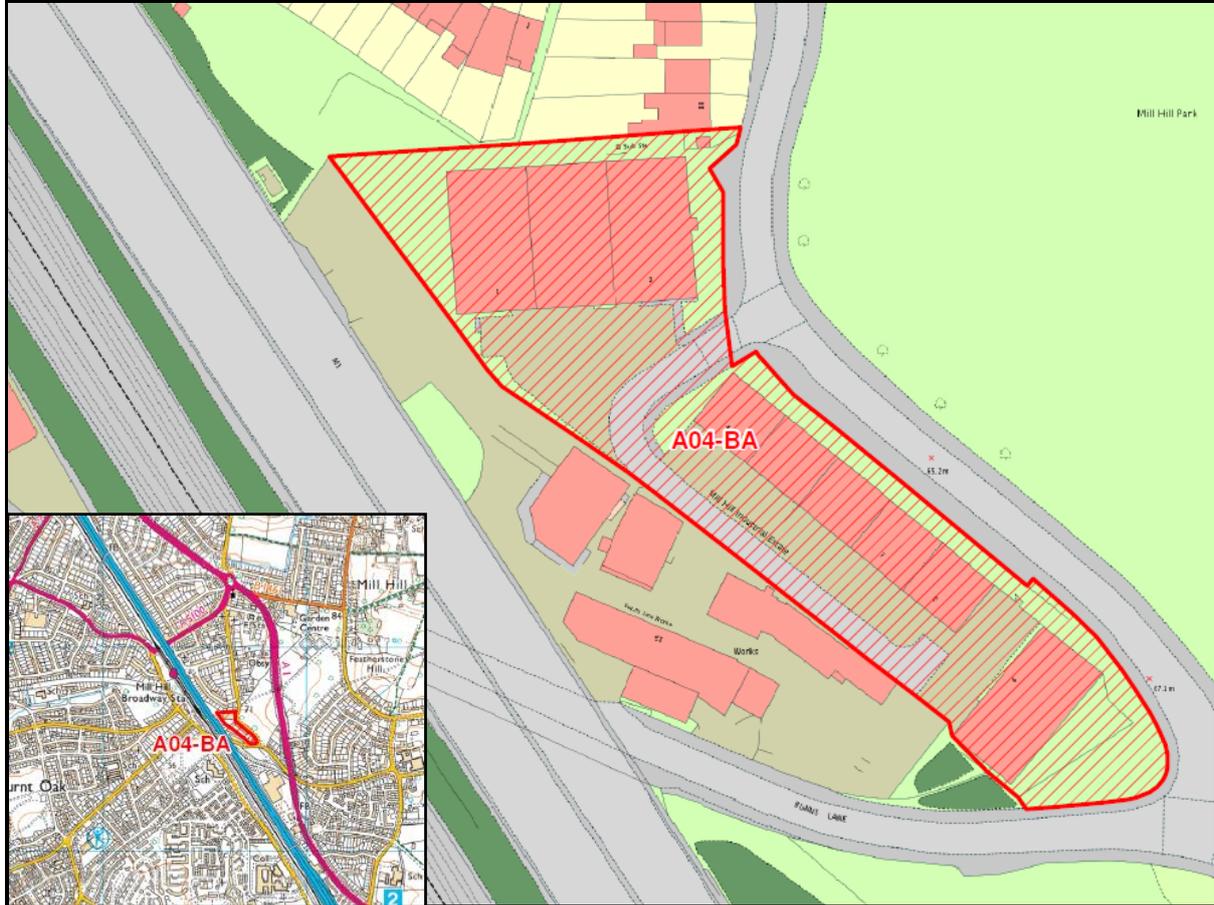
<b>Borough</b>	Barnet
<b>Type of Location</b>	Area
<b>Location Reference</b>	A03-BA - Brunswick Industrial Park
<b>Size</b>	3.95 ha
<b>Area Description</b>	The area is a Business Park which includes a builder's yard and other trade outlets.
<b>Description of surrounding uses</b>	The area is bound on all sides by residential properties. Areas of green open space lie to the north of the area. However these are separated from the Business Park by residential properties.

Planning Information									
<b>Planning Designation</b>	Area is designated as a Locally Significant Industrial Site (LSIS). Area is proposed for Article 4 designation to remove PD rights for conversion to residential. Expect to be confirmed Sept 2019.								
<b>Relevant Local Plan Policy</b>	Local Plan Development Management Policy DM14: New and existing employment space								
Land Use									
<b>Co-location</b>	Not practicable in this location								
<b>Major New Developments</b>	None in immediate area								
<b>Decentralised Energy Network</b>	In close proximity to area designated as having potential for Decentralised Energy network.								
<b>Details of in-situ infrastructure</b>	None identified								
Constraints									
<b>Flood Risk</b>	Flood Zone 1 (lowest probability of flooding). Parts of the Business Park at risk of flooding from surface water.								
<b>Surface and Groundwater</b>	The north of the area falls within Source Protection Zones 1 and 2. Facilities within Source Protection Zone 1 should only deal with inert waste unless otherwise agreed with the Environment Agency.								
 <p>© Crown Copyright and database right (2016). Ordnance Survey 100021551.</p>									
<table border="0"> <tr> <td><b>Key</b></td> <td></td> </tr> <tr> <td> Zone I - Inner Protection Zone</td> <td> Proposed Areas</td> </tr> <tr> <td> Zone II - Outer Protection Zone</td> <td></td> </tr> <tr> <td> Zone III - Total Catchment</td> <td></td> </tr> </table> <p>Copyright © and Database rights Environment Agency 2010. All rights reserved. Some of the information within the Flood Map is based in part on digital spatial data licensed from the Centre for Ecology and Hydrology © NERC.</p>		<b>Key</b>		 Zone I - Inner Protection Zone	 Proposed Areas	 Zone II - Outer Protection Zone		 Zone III - Total Catchment	
<b>Key</b>									
 Zone I - Inner Protection Zone	 Proposed Areas								
 Zone II - Outer Protection Zone									
 Zone III - Total Catchment									

<b>Land Instability</b>	No known issues
<b>Sensitive Receptors</b> (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Residential properties bound the Business Park on all sides.
<b>Nature Conservation</b>	A Borough Site of Importance for Nature Conservation lies approximately 25m north of the area.
<b>Green Belt and Open Space</b>	Metropolitan Open Space approximately 25m north of the area
<b>Historic Environment</b>	No assets identified in vicinity.
<b>Highways</b>	Access is suitable for HGV traffic and the area is currently used by commercial vehicles. Given the close proximity of residential properties 24 hour access is unlikely to be suitable.
<b>Conclusion</b>	
<b>Potential Uses</b>	Waste Transfer, Processing and Recycling. The areas of the Business Park which do not lie within source protection zone 1 are potentially suitable to handle hazardous waste.
<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting
<b>General mitigation measures</b>	<p>There are a number of environmental and amenity issues facing the area such as the proximity of residential properties and Metropolitan Open Space which is designated a borough SINC. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are therefore likely to be important mitigation measures.</p> <p>Consideration should be given to any potential impacts on air quality and measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site and providing wheel washing facilities could help mitigate any potential impacts.</p> <p>In addition, as the area lies within Source Protection Zone 1, the completion of an assessment of risk posed to groundwater should be undertaken and the incorporation of SuDS or other techniques to manage surface water runoff will be key mitigation measures. Measures to protect ground water will need to be agreed with the Environment Agency.</p> <p>As proposals may increase the level of traffic generated within the area a traffic impact assessment will be a key mitigation measure.</p>

**A04-BA - Mill Hill Industrial Estate, Barnet**

**1:1,350 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)**



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**Area Details**

<b>Borough</b>	Barnet
<b>Type of Location</b>	Area
<b>Location Reference</b>	A04-BA - Mill Hill Industrial Estate
<b>Size</b>	0.90 ha
<b>Area Description</b>	Industrial Estate comprising numerous small warehouses.
<b>Description of surrounding uses</b>	Industrial/commercial area borders the south. The M1 motorway is also located to the south. Adjacent residential area to the north and Mill Hill Park to the east.

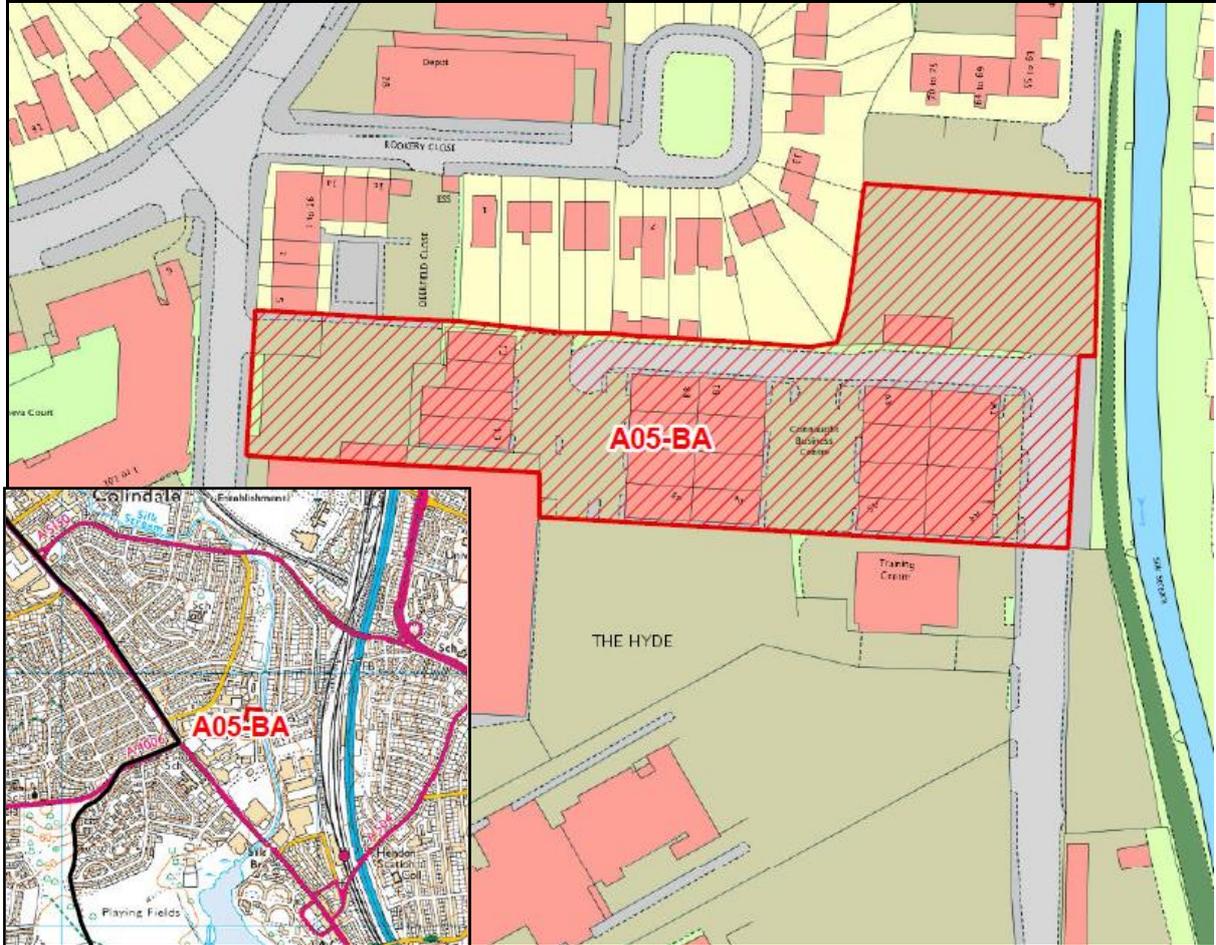
**Planning Information**

<b>Planning Designation</b>	Area is designated as a Locally Significant Industrial Site (LSIS). Area is proposed for Article 4 designation to remove PD rights for conversion to residential. Expect to be confirmed Sept 2019.
<b>Relevant Local Plan Policy</b>	Local Plan Development Management Policy DM14: New and existing employment space
<b>Land Use</b>	
<b>Co-location</b>	Not practicable in this location
<b>Major New Developments</b>	None in immediate area
<b>Decentralised Energy Network</b>	No.
<b>Details of in-situ infrastructure</b>	None identified
<b>Constraints</b>	
<b>Flood Risk</b>	Area is within Flood Zone 1 (lowest probability of flooding). Site is at risk of flooding from surface water.
<b>Groundwater</b>	The area is not within a Source Protection Zone.
<b>Land Instability</b>	No stability issues identified.
<b>Sensitive Receptors</b> (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Residential properties lie adjacent to the north of the industrial estate.
<b>Nature Conservation</b>	No issues identified.
<b>Green Belt and Open Space</b>	Mill Hill Park Green Belt lies 15m east of area.
<b>Historic Environment</b>	No assets identified in vicinity.
<b>Highways</b>	Access is suitable for HGV traffic but there are restrictions on routes with low bridges that would need investigating.
<b>Conclusion</b>	
<b>Potential uses</b>	Waste transfer, processing and recycling. The area is potentially suitable to handle hazardous waste.
<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.

<p><b>Potential mitigation measures</b></p>	<p>There are a number of environmental and amenity issues facing the area such as the proximity of residential properties adjacent to the north and Mill Hill Park which is designated Green Belt land to the east, as such the area is not suitable for external facilities. Facilities should therefore be enclosed and incorporate dust suppression and other measures such as wheel-washing negative air pressure and rapid-closure doors.</p> <p>The ecological value of the area and its surrounding should be assessed. Any future development proposals should incorporate high quality boundary treatment, landscape screening or park improvements to protect the recreational potential of the park and surrounding residential amenity.</p> <p>As the area is at risk from surface water flooding the completion of a Flood Risk Assessment and inclusion of SuDs or other appropriate techniques to manage surface water runoff will be a key mitigation measures.</p> <p>As proposals may increase the level of traffic generated within the area and the suitability of local roads needs to be assessed and so a traffic impact assessment should be undertaken.</p>
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**A05-BA - Connaught Business Centre, Barnet**

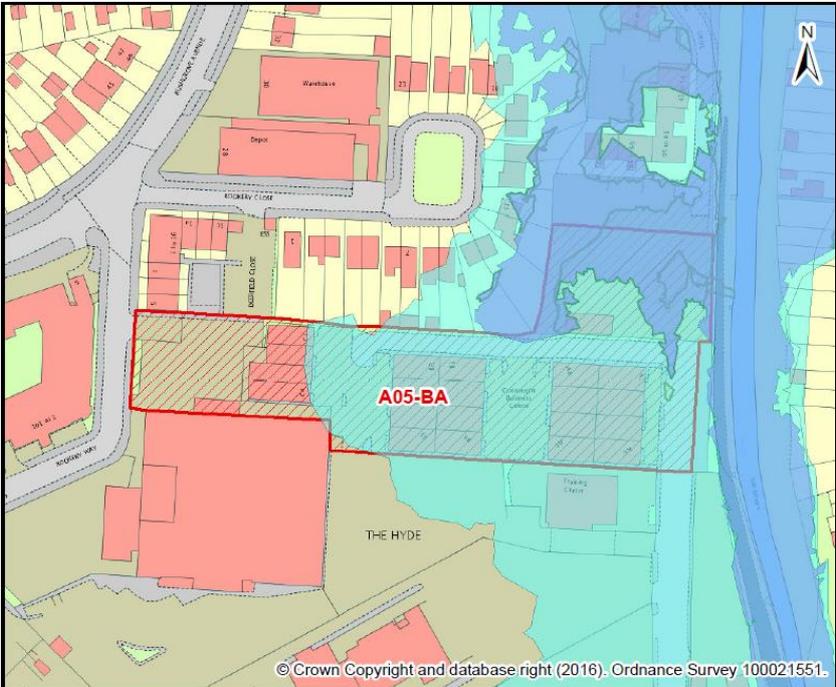
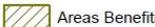
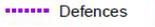
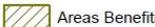
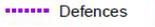
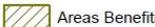
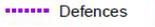
1:1,500 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)



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**Area Details**

<b>Borough</b>	Barnet
<b>Type of Location</b>	Area
<b>Location Reference</b>	A05-BA - Connaught Business Centre
<b>Size</b>	0.90 ha
<b>Area Description</b>	A commercial business centre made up of small units.
<b>Description of surrounding uses</b>	A commercial area lies to the south as well as car parking. Residential properties border the north of the area.  The former Telephone Exchange site to the west has been granted approval (18/0352/FUL) - subject to Mayoral call-in - for comprehensive redevelopment for up to 505 residential dwellings and flexible commercial floorspace.

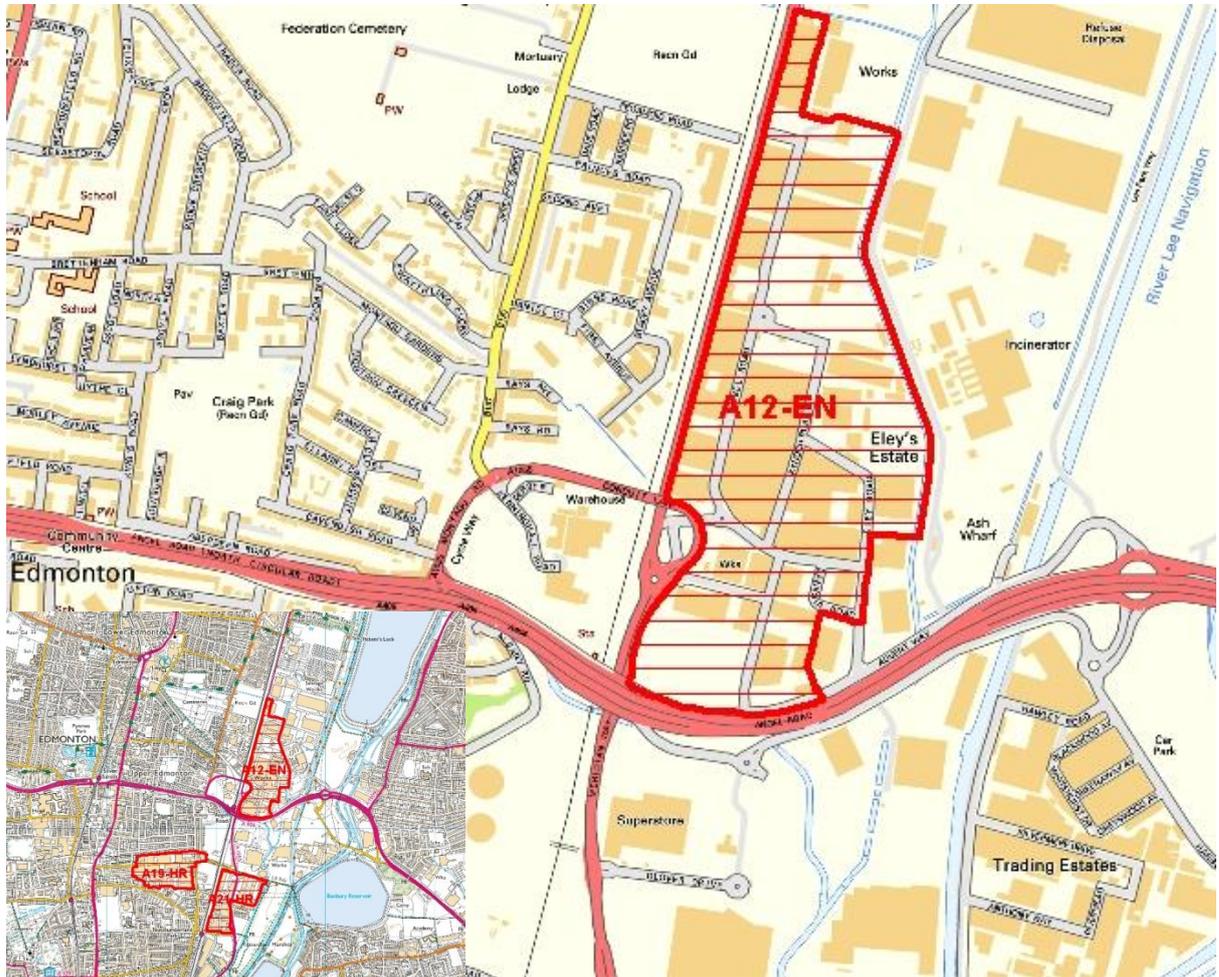
Planning Information									
<b>Planning Designation</b>	Area is designated a Locally Significant Industrial Site (LSIS). Area is proposed for Article 4 designation to remove PD rights for conversion to residential. Expect to be confirmed Sept 2019.								
<b>Relevant Local Plan Policy</b>	Local Plan Development Management Policy DM14: New and existing employment space								
Land Use									
<b>Co-location</b>	Not practicable in this location								
<b>Major New Developments</b>	None in immediate area								
<b>Decentralised Energy Network</b>	No.								
<b>Details of in-situ infrastructure</b>	None identified								
Constraints									
<b>Flood Risk</b>	<p>Area is within Flood Zone 2 &amp; 3 (medium and highest probability of flooding) and a stream runs adjacent to the east of the area.</p> <p>Facilities within Flood Zone 3 should only deal with inert waste unless otherwise agreed with the Environment Agency.</p> <p>At high risk of surface water flooding.</p>								
 <p>© Crown Copyright and database right (2016). Ordnance Survey 100021551.</p>									
<table border="0"> <tr> <td><b>Key</b></td> <td></td> </tr> <tr> <td> Flood Zone 3</td> <td> Areas Benefiting from Flood Defences</td> </tr> <tr> <td> Flood Zone 2</td> <td> Flood Storage Areas</td> </tr> <tr> <td> Defences</td> <td> Proposed Areas</td> </tr> </table>		<b>Key</b>		 Flood Zone 3	 Areas Benefiting from Flood Defences	 Flood Zone 2	 Flood Storage Areas	 Defences	 Proposed Areas
<b>Key</b>									
 Flood Zone 3	 Areas Benefiting from Flood Defences								
 Flood Zone 2	 Flood Storage Areas								
 Defences	 Proposed Areas								
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<b>Surface and Groundwater</b>	The area is not within a Source Protection Zone. Silk Stream is adjacent to the east of site.
<b>Land Instability</b>	Historic landfill identified adjacent to the north east corner of area. This represents a potential stability issues in the north east of the area which will needed to be investigated if development is proposed in this area.
<b>Sensitive Receptors</b>	Residential properties adjacent to the north of the area.
<b>Nature Conservation</b>	Yes, a borough SINC lies adjacent to the east of area.
<b>Green Belt and Open Space</b>	None locally
<b>Historic Environment</b>	No assets identified in vicinity.
<b>Highways</b>	Access is suitable for HGV traffic but there may be local parking issues that reduce width for HGV access. Residential streets are located in the vicinity that may be affected by 24hr use. The suitability of specific proposals would need to be assessed.
<b>Conclusion</b>	
<b>Potential Uses</b>	Waste transfer, processing and recycling. Parts of the area which are not covered by Flood Zone 3 are potentially suitable to handle hazardous waste.
<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.
<b>General mitigation measures</b>	<p>There are a number of environmental and amenity issues facing the area such as the proximity of residential properties and borough SINC, as such the area is not suitable for external facilities. Facilities should therefore be enclosed and consideration should be given to siting any future proposals away from any sensitive receptors. Key mitigation measures should include dust suppression and other measures such as wheel-washing, negative air pressure and rapid-closure doors.</p> <p>Given the proximity of a borough SINC, undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the site are therefore likely to be important mitigation measures.</p> <p>As parts of the area are at a medium to high risk of flooding, 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. Appropriate measures should also be incorporated to prevent any contamination of the adjacent watercourses.</p>

	<p>A contamination and ground stability appraisal would be required to assess potential impacts from the historic landfill adjacent to the area boundary.</p> <p>As proposals may increase the level of traffic generated and suitability of local roads need to be assessed as such a traffic impact assessment will be a key mitigation measure.</p>
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## 12-EN – Eleys Estate, Enfield

1:10,700 map of area showing outline over MasterMap base layer (inset map is of scale 1:24,000)



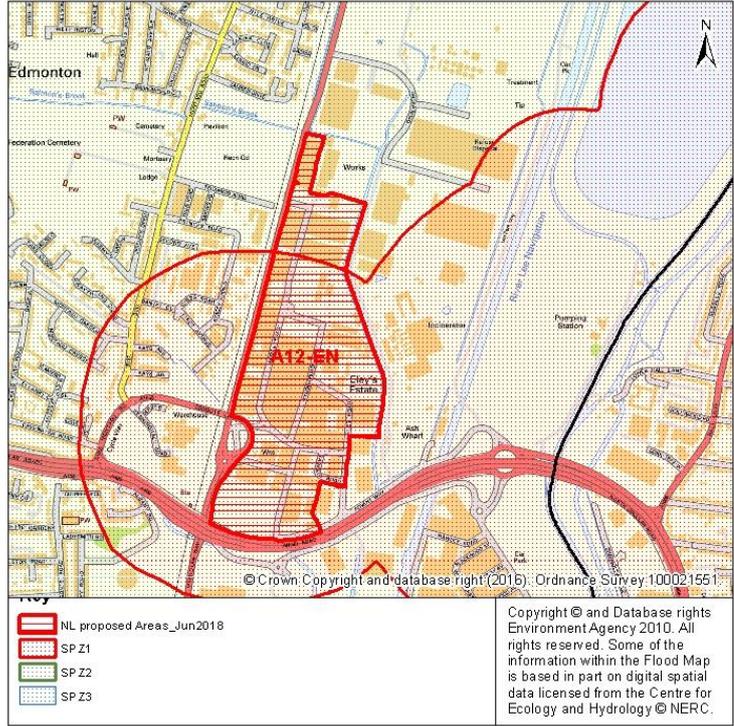
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### Area Details

<b>Borough</b>	Enfield
<b>Type of Location</b>	Area
<b>Location Reference</b>	A12-EN – Eleys Estate
<b>Size</b>	26.1ha
<b>Area Description</b>	Industrial area of Eleys Estate which incorporates a number of existing waste sites and neighbours Edmonton Eco Park and Aztec A406 Industrial Estate.
<b>Description of surrounding uses</b>	Industrial/commercial and residential properties lie to the north. The east is bordered by Edmonton Ecopark which in turn borders the River Lee Navigation and the Lee Valley Regional Park, whilst the south is bordered by the North Circular Road.

<b>Planning Information</b>	
<b>Planning Designation</b>	Area is designated as a Strategic Industrial Location (SIL) and lies within the Edmonton Leaside Area Action Plan Area (ELAAP).
<b>Relevant Local Plan Policy</b>	Edmonton Leaside Area Action Plan Area (ELAAP) (Yet to be adopted), Core Policies 14, 28 and 37, DMD Policies 19, 20, 21, 22 and 23.
<b>Land Use</b>	
<b>Co-location</b>	Yes, a number of facilities already exist in the area.
<b>Major New Developments</b>	Yes, within Edmonton Leaside Area Action Plan Area (ELAAP) (Yet to be adopted), and in close proximity to Meridian Water Development Area. The estate also lies within an Opportunity Area and a Housing Zone lies adjacent to the south as set out within the London Plan. The area is in close proximity to the new Meridian Water station, which is likely to also become a Crossrail 2 station.
<b>Decentralised Energy Network</b>	Area is within the Hinterland Opportunity Area and the Proposed Upper Lea Valley Decentralised Heating Transmission runs adjacent to Edmonton Ecopark on the eastern boundary of the site and within the south of the site.
<b>Details of in-situ infrastructure</b>	Overhead lines adjacent to east of the area: Brimsdown-Tottenham-Waltham Cross
<b>Constraints</b>	
<b>Flood Risk</b>	Within Eley's Estate the land in the south and west is largely within Flood Zone 2 (medium probability of flooding) and Flood Zone 3 (highest probability of flooding) with the south east of the estate within Flood Zone 2. The northeast corner is within Flood Zone 1 (lowest probability of flooding).

<p><b>Surface and Groundwater</b></p>	<p>The southern half and the north east of Eley’s Estate are within Source Protection Zone 1 with the remainder within Source Protection Zone 2.</p> <p>The Environment Agency has raised concerns over potential impacts on groundwater from development within this area. Facilities within Source Protection Zone 1 should only deal with inert waste unless otherwise agreed with the Environment Agency.</p> <p>Salmon’s Brook runs around the boundary of the area and the River Lee Navigation lies to the east of the area adjacent to Edmonton Ecopark.</p>

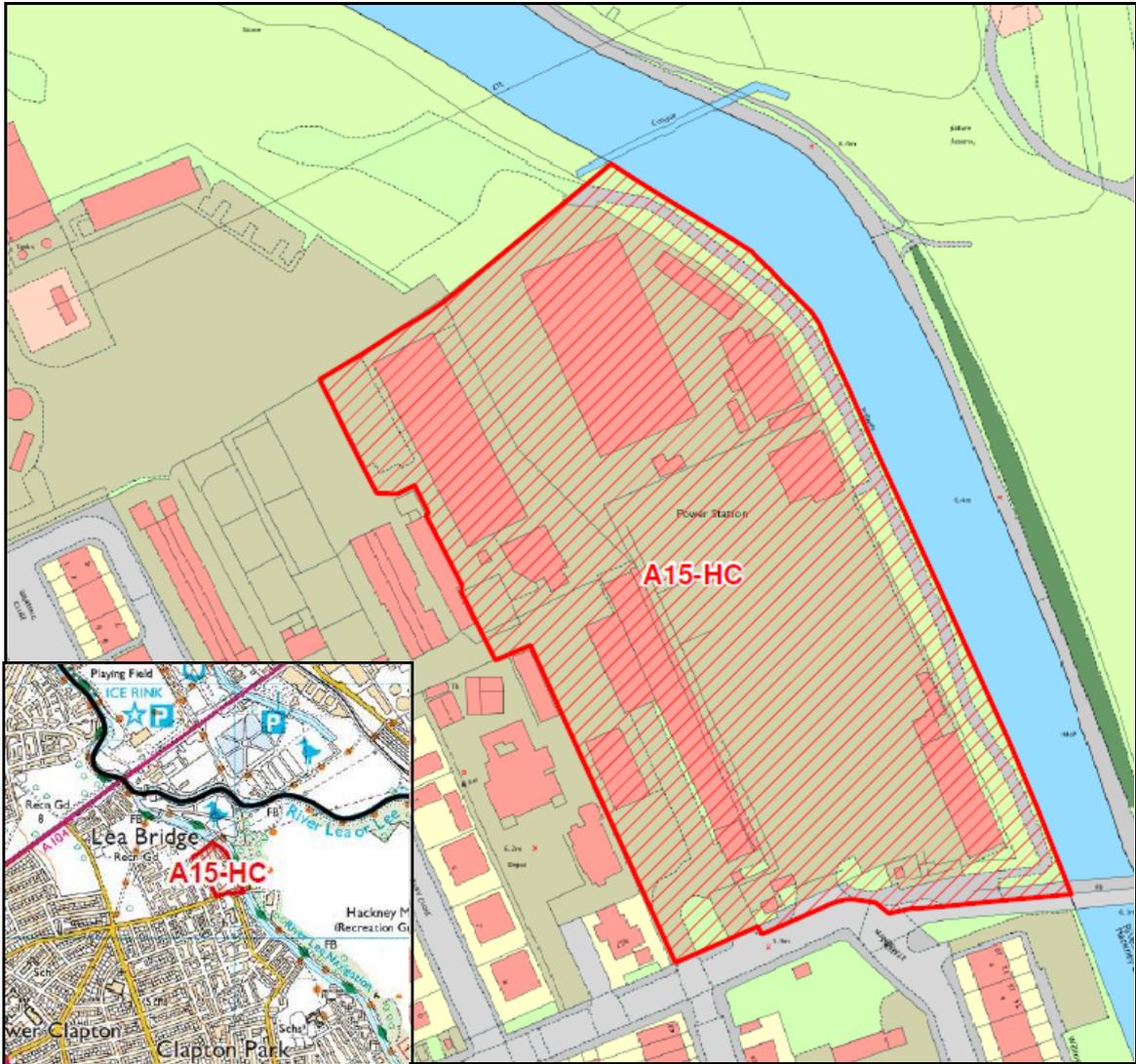
	 <p>Edmonton</p> <p>Lee Valley Regional Park</p> <p>A12-EN</p> <p>Cley's Estate</p> <p>© Crown Copyright and database right (2016). Ordnance Survey 100021551</p> <p>Copyright © and Database rights Environment Agency 2010. All rights reserved. Some of the information within the Flood Map is based in part on digital spatial data licensed from the Centre for Ecology and Hydrology © NERC.</p>
<p><b>Land Instability</b></p>	<p>An historic minerals working and landfill is located outside the north east corner of site. A further historic minerals working and landfill can also be found adjacent to the west of site.</p> <p>There is potential for stability issues in the area covering and adjacent to the minerals working and landfills. However, the whole area is already developed which suggests any issue can be addressed. Further investigation will be required at the planning application stage.</p>
<p><b>Sensitive Receptors</b> (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)</p>	<p>Residential properties lie 50m west of the north western corner of the estate. New residential properties will be built nearby through the Meridian Water development on the other side of the North Circular Road.</p>
<p><b>Nature Conservation</b></p>	<p>The Lee Valley Regional Park lies adjacent to the east of site with some overlap of the estates boundary. Within the Regional Park lies a Metropolitan Site of Importance for Nature Conservation (SINC).</p>
<p><b>Green Belt and Open Space</b></p>	<p>Green Belt land within the Lee Valley Regional Park lies adjacent to the east of the area.</p>

<b>Historic Environment</b>	<p>Historic England commented that development should avoid harm to the historic environment and the setting of Chingford Mill Pumping Station (grade II) should be considered. <del>The potential archaeology value of area should be considered</del> along with the setting of Montagu Road Cemeteries Conservation Area.</p> <p>Within the Lea Valley West Bank Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</p>
<b>Highways</b>	<p>Access is suitable for HGVs traffic, however there are known problems with parking within the area which impact the suitability of the highways to handle HGV traffic.</p> <p>The North Circular Road (adjacent to the south of site) is classed as an Air Quality “hot spot” as emissions regularly surpass the targets.</p>
<b>Conclusion</b>	
<b>Potential Uses</b>	<p>Integrated resource recovery facilities/resource parks, Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, Waste transfer, indoor composting, in-vessel composting, processing and recycling.</p>
<b>Uses unlikely to be suitable</b>	<p>Outdoor composting. Area is potentially unsuitable to handle hazardous waste.</p>
<b>Potential mitigation measures</b>	<p>There are a number of environmental and amenity issues facing the area such as the proximity of residential properties and the Lee Valley National Park which includes areas designated as SSSI and Metropolitan SINC, as such facilities in proximity to these features are not suitable for external facilities. Key mitigation measures should include dust suppression and other measures such as wheel-washing, negative air pressure and rapid-closure doors.</p> <p>Any future development proposals should include an assessment of ecological value on the proposed development area and wider area. The proposals should protect the existing green infrastructure or provide appropriate replacement landscaping and/or planting and incorporate appropriate boundary treatments.</p> <p>As the area is at a medium to high risk of flooding, 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. Appropriate measures should also be incorporated to prevent any contamination of groundwater or watercourses in or adjacent</p>

	<p>to the area.</p> <p>Proposals in the north east corner or along the west of the area will need a contamination and ground stability appraisal to assess potential impacts from the historic landfill and minerals working in these areas.</p> <p>As proposals may increase the level of traffic generated within the area an air quality impact assessment will be a key mitigation measure. Consideration should be given to parking arrangement as there are known issues within the area.</p> <p>Where necessary an appraisal to assess impact of new structures on the historic environment will be required. Building design should be sympathetic to the historic setting.</p>
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**A15-HC – Millfields LSIS, Hackney**

**1:1,750 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)**



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**Area Details**

<b>Borough</b>	Hackney
<b>Type of Location</b>	Area
<b>Location Reference</b>	A15-HC – Millfields LSIS
<b>Size</b>	2.19 ha
<b>Area Description</b>	Industrial Site occupied by a Hackney Council Waste Transfer Station and Fleet Depot and a Power Station.
<b>Description of surrounding uses</b>	The area is bordered to the north by the Middlesex Filter Beds Nature Reserve and Hackney Marsh to the east, both of which lie within the Lee Valley Regional Park. Residential properties lie to the south with residential and industrial properties to the

	west.						
<b>Planning Information</b>							
<b>Planning Designation</b>	Area is designated as a Local Significant Industrial Site (LSIS)						
<b>Relevant Local Plan Policy</b>	Core Strategy (2010), Development Management Local Plan (2015), Policies Map.						
<b>Land Use</b>							
<b>Co-location</b>	Location not suitable						
<b>Major New Developments</b>	None within location						
<b>Decentralised Energy Network</b>	None within location						
<b>Details of in-situ infrastructure</b>	National Grid identify the following assets during consultation: <ul style="list-style-type: none"> <li>i. Underground cables – 400kV route – Hackney to West Ham</li> <li>ii. Hackney 132 kV substation.</li> </ul>						
<b>Constraints</b>							
<b>Flood Risk</b>	<p>The majority of the area is within Flood Zone 1 (lowest probability of flooding). The eastern, southern and western boundaries lie within Flood Zone 2 (medium probability of flooding) whilst a small section in the southwest corner is within Flood Zone 3 (highest probability of flooding) but benefits from flood defences.</p>						
<p><b>Key</b></p> <table border="0"> <tr> <td> Flood Zone 3</td> <td> Areas Benefiting from Flood Defences</td> </tr> <tr> <td> Flood Zone 2</td> <td> Flood Storage Areas</td> </tr> <tr> <td> Defences</td> <td> Proposed Areas</td> </tr> </table> <p>Copyright © and Database rights Environment Agency 2010. All rights reserved. Some of the information within the Flood Map is based in part on digital spatial data licensed from the Centre for Ecology and Hydrology © NERC.</p>		Flood Zone 3	Areas Benefiting from Flood Defences	Flood Zone 2	Flood Storage Areas	Defences	Proposed Areas
Flood Zone 3	Areas Benefiting from Flood Defences						
Flood Zone 2	Flood Storage Areas						
Defences	Proposed Areas						

<b>Surface and Groundwater</b>	Not within a Source Protection Zone. The River Lee lies adjacent to the east of the area.
<b>Land Instability</b>	No stability issues identified.
<b>Sensitive Receptors</b> (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Mandeville Primary School is approximately 10m south and residential properties approximately 15m south of the area.
<b>Nature Conservation</b>	The Hackney Marshes lie adjacent to the east of the area and are designated as Metropolitan Site of Importance for Nature Conservation (SINC) to the east lies the River Lee which is designated a Metropolitan SINC whilst the Lee Valley Regional Park to the north west is designated a Borough SINC.
<b>Green Belt and Open Space</b>	Hackney Marsh lies to the north and east and is designated as Metropolitan Open Land. The Lee Valley Regional Park lies adjacent to the east of the area.
<b>Historic Environment</b>	<p>There are three Grade II listed buildings adjacent to the west of site:</p> <ul style="list-style-type: none"> <li>• Hackney Borough Disinfecting Station (on Heritage at Risk Register)</li> <li>• Shelter House</li> <li>• Caretakers Lodge</li> </ul> <p>The Mandeville Primary School which is Grade II listed is situated to the south of the area.</p> <p>Historic England has commented that any development within the area located to the east and north of these assets must address their long term conservation needs in a comprehensive manner.</p> <p>Within Lea Valley Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</p>
<b>Highways</b>	<p>Access suitable for HGV traffic. However, any future planning application should maintain or improve emissions to air. Any changes that may result in a worsening of air quality should be assessed as part of an air quality impact assessment.</p> <p>Routing arrangements for HGV traffic should be considered as part of any future planning applications.</p>
<b>Conclusion</b>	
<b>Potential Uses</b>	Waste Transfer which is protected under the London Plan. Areas which are not within flood zone 3 are potentially suitable to handle hazardous waste.
<b>Uses unlikely to be suitable</b>	N/A

**Potential mitigation measures**

There are a number of environmental and amenity issues facing the area such as the proximity of residential properties and the Lee Valley Regional Park, as such the area is not suitable for external facilities. Facilities should therefore be enclosed. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the area are therefore likely to be important mitigation measures.

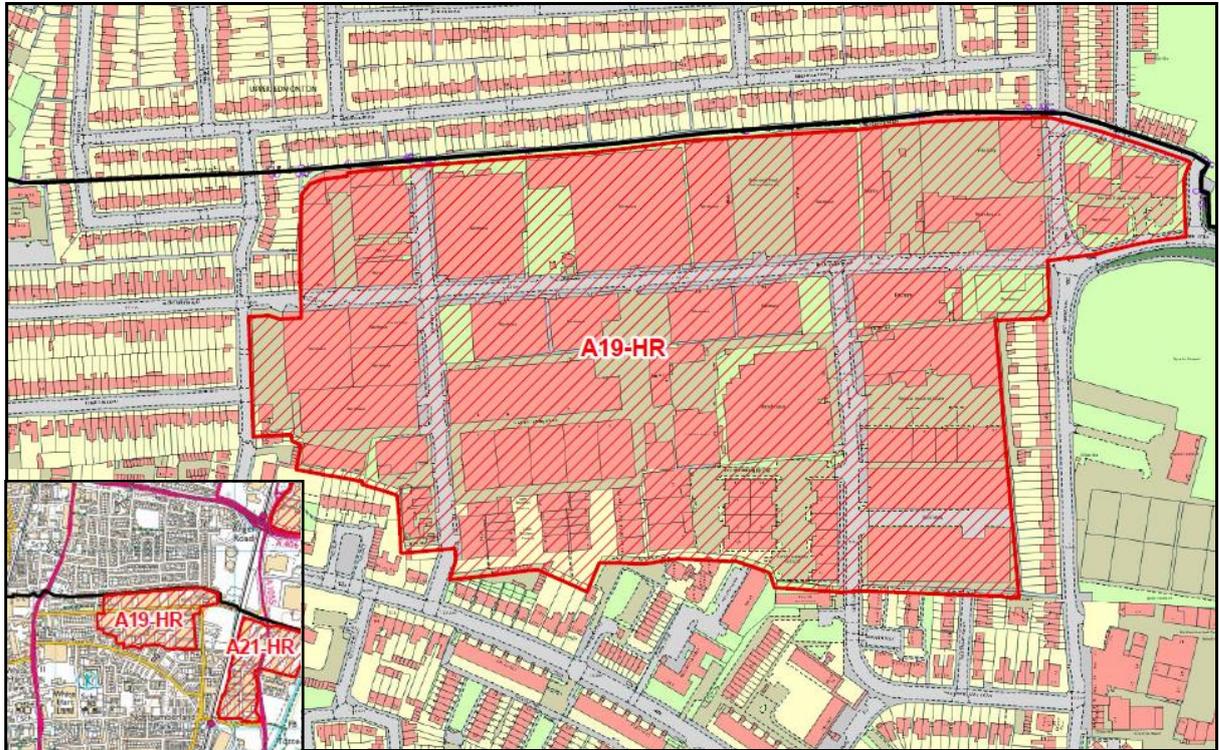
Key mitigation measures should include dust suppression and other measures such as wheel-washing, negative air pressure and rapid-closure doors. Proposals should also protect the existing green infrastructure or provide appropriate replacement landscaping and/or planting and incorporate appropriate boundary treatments.

Part of the area are at medium to high risk of surface water flooding the completion of a Flood Risk Assessment and inclusion of SuDs or other appropriate techniques to manage surface water runoff will be key mitigation measures.

An appraisal to assess impact of new structures on the historic environment will be required. Building design should be sympathetic to the historic setting.

### A19-HR – Brantwood Road, Haringey

1:4,000 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)



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#### Area Details

<b>Borough</b>	Haringey
<b>Type of Location</b>	Area
<b>Location Reference</b>	A19-HR – Brantwood Road
<b>Size</b>	16.90 ha
<b>Area Description</b>	Industrial Estate
<b>Description of surrounding uses</b>	The Industrial Estate is surrounded by residential properties on all sides as well as a sports field to the east and industrial land to the north east.

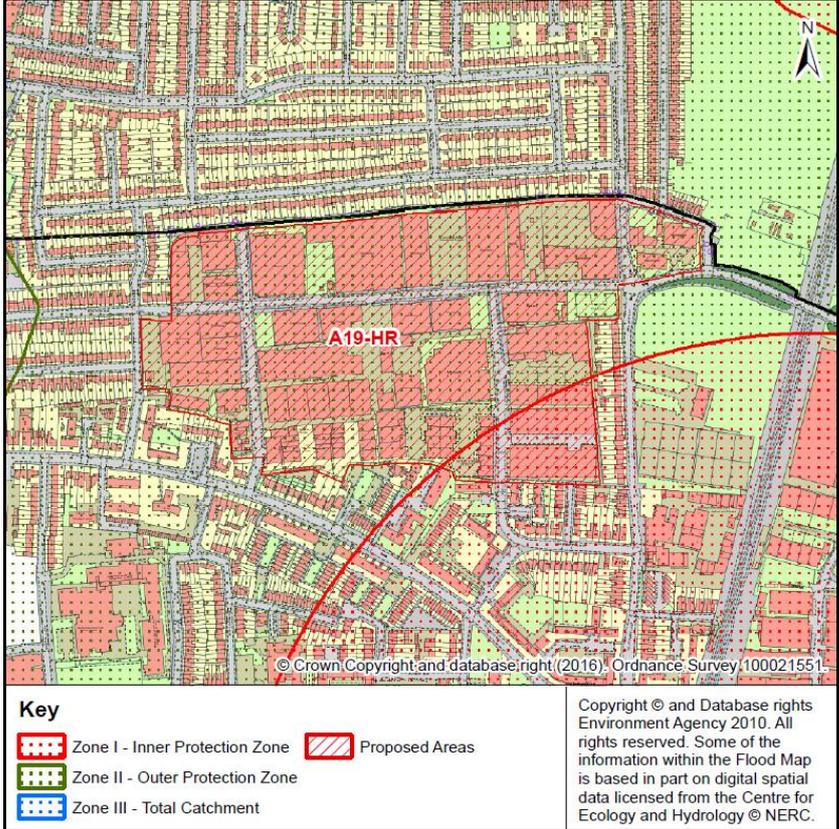
#### Planning Information

<b>Planning Designation</b>	The area is designated as a Strategic Industrial Location (SIL)
<b>Relevant Local Plan Policy</b>	The area is safeguarded as a waste site within Haringey's Site Allocations DPD

#### Land Use

<b>Co-location</b>	Yes, provided the right sites with the industrial area came forward
<b>Major New Developments</b>	The Industrial Estate lies within an Opportunity Area and a

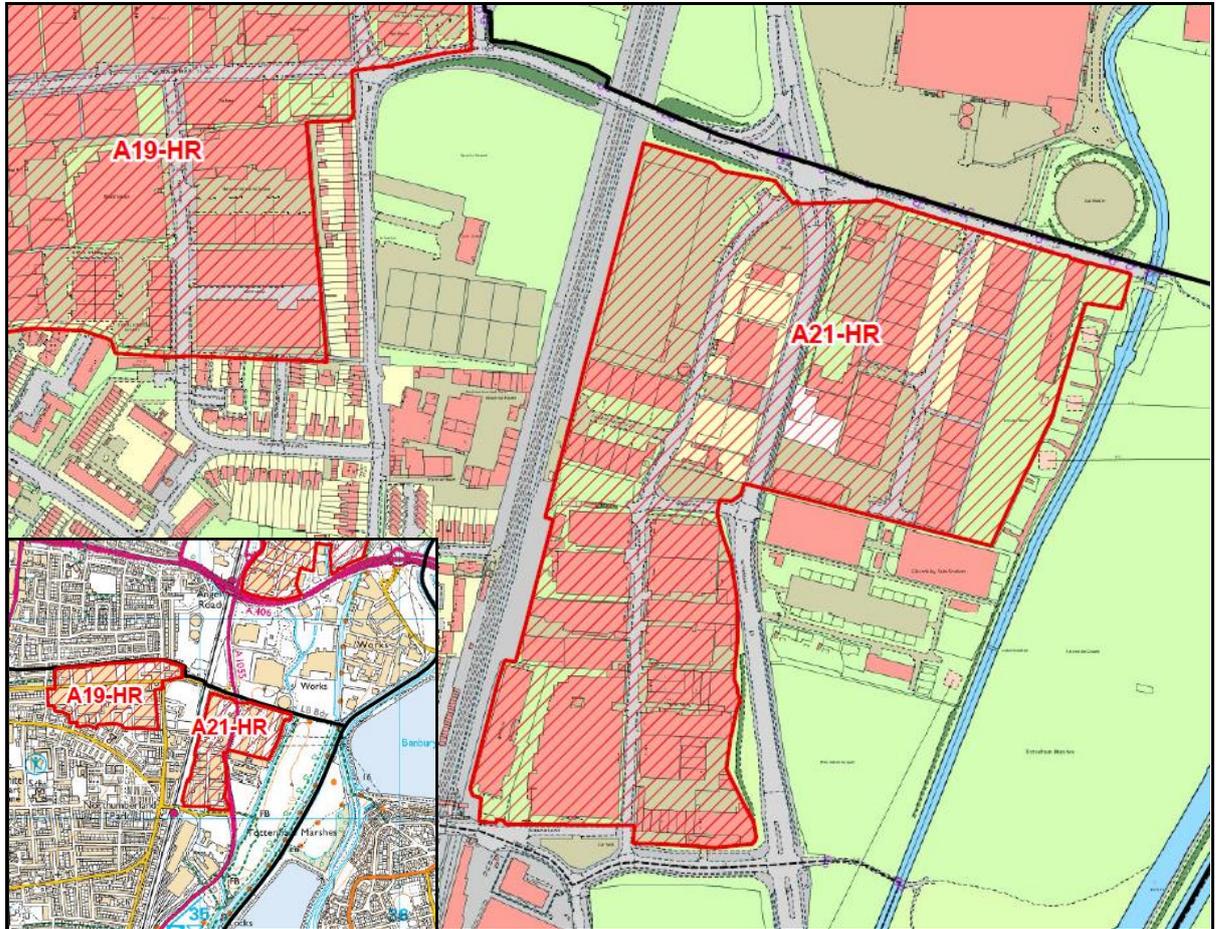
	Housing Zone as set out within the London Plan. Transport for London has identified the area as lying in close proximity to a proposed Crossrail 2 station.
<b>Decentralised Energy Network</b>	The proposed Upper Lee Valley potential Decentralised Heating Network runs through the area. To the north east of the area is the potential Enfield decentralised energy network.
<b>Details of in-situ infrastructure</b>	None identified
<b>Constraints</b>	
<b>Flood Risk</b>	<p>The site area is largely Flood Zone 1 with the western most part of the site area falling partially within Flood Zone 2. The proposed use for the site is considered to be ‘Less Vulnerable’. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.</p> <p>The site area is shown to flood from the Pymmes Brook in the 0.1% AEP event (without defences) and this will increase in the future as a result of climate change with 1% AEP event to cover approximately one quarter of the site area.</p> <p>A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.</p>
<b>Surface and Groundwater</b>	The south east corner of the area is within Source Protection Zone 1, the remainder is within Source Protection Zone 2. Facilities within Source Protection Zone 1 should only deal with inert waste unless otherwise agreed with the Environment Agency.

	 <p><b>Key</b></p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid red; background: repeating-linear-gradient(45deg, transparent, transparent 2px, red 2px, red 4px);"></span> Zone I - Inner Protection Zone</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid green; background: repeating-linear-gradient(-45deg, transparent, transparent 2px, green 2px, green 4px);"></span> Zone II - Outer Protection Zone</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid blue; background: repeating-linear-gradient(-45deg, transparent, transparent 2px, blue 2px, blue 4px);"></span> Zone III - Total Catchment</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid red; background: repeating-linear-gradient(45deg, transparent, transparent 2px, red 2px, red 4px);"></span> Proposed Areas</li> </ul> <p>Copyright © and Database rights Environment Agency 2010. All rights reserved. Some of the information within the Flood Map is based in part on digital spatial data licensed from the Centre for Ecology and Hydrology © NERC.</p>
<b>Land Instability</b>	No stability issues identified.
<b>Sensitive Receptors</b> (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	The Estate is bound on all sides by residential properties.
<b>Nature Conservation</b>	No features identified
<b>Green Belt and Open Space</b>	Land to the east of site is designated as Significant Local Open Land
<b>Historic Environment</b>	No features identified
<b>Highways</b>	Access suitable for HGV traffic. Area is suitable on highways grounds but details of access and egress would need to be considered as part of any future development proposals.
<b>Conclusion</b>	
<b>Potential Uses</b>	Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, waste transfer, processing and recycling. Areas not within Source Protection Zone 1 are potentially suitable to handle hazardous waste.
<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, outdoor composting, indoor composting and in-vessel composting.

<b>Potential mitigation measures</b>	<p>There are a number of environmental and amenity issues facing the area such as the proximity of residential properties and Significant Open Space, as such the area is not suitable for external facilities. Facilities should therefore be enclosed and consideration should be given to siting any future proposals towards the centre of the area away from any sensitive receptors. Key mitigation measures should include dust suppression and other measures such as wheel-washing.</p> <p>As parts of the area are at a medium risk of flooding, 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. Appropriate measures should also be incorporated to prevent any contamination of groundwater or adjacent watercourses.</p> <p>As proposals may increase the level of traffic generated within the area a traffic impact assessment will be a key mitigation measure.</p>
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**A21-HR – North East Tottenham (SIL 12), Haringey**

**1: 4,850 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)**



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**Area Details**

<b>Borough</b>	Haringey
<b>Type of Location</b>	Area
<b>Location Reference</b>	A21-HR – North East Tottenham (SIL 12)
<b>Size</b>	15.40 ha
<b>Area Description</b>	Warehouses and Industrial units within the area.
<b>Description of surrounding uses</b>	To the east of the area lies the Lee Valley Regional Park. To the west, the site is bound by a railway line, with a train station to the south. Beyond the railway line are industrial and residential uses. There are allotments to the south and an Ikea retail development to the north.

**Planning Information**

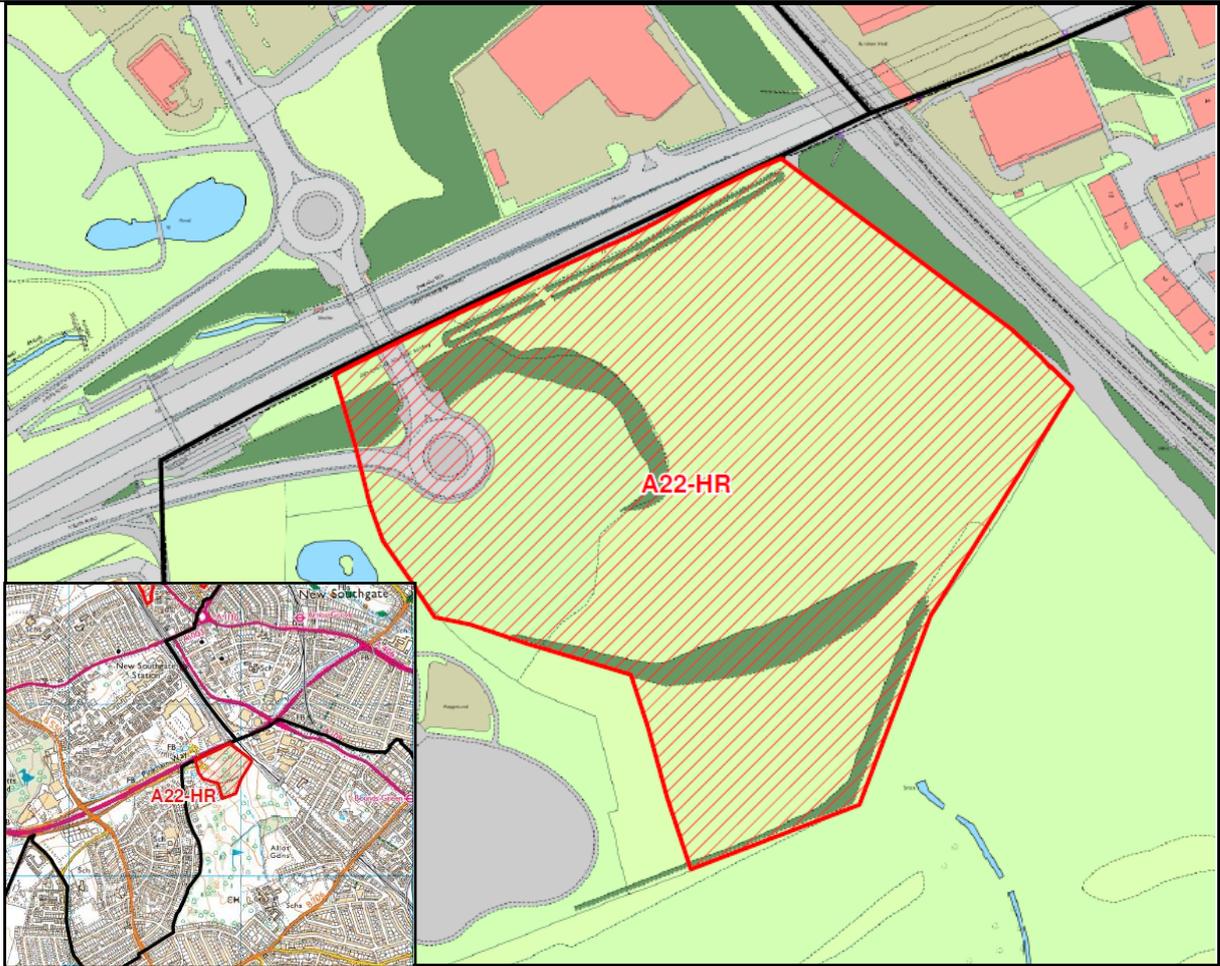
<b>Planning Designation</b>	Area is designated as a Strategic Industrial Location (SIL)
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<p><b>Surface and Groundwater</b></p>	<p>The whole of the area is within Source Protection Zone 1.</p> <p>Facilities within Source Protection Zone 1 should only deal with inert waste unless otherwise agreed with the Environment Agency.</p> <p>Pymmes Brook Lies 10m east of site.</p> <p><b>Key</b></p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid red; background-color: white; margin-right: 5px;"></span> Zone I - Inner Protection Zone</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid green; background-color: white; margin-right: 5px;"></span> Zone II - Outer Protection Zone</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid blue; background-color: white; margin-right: 5px;"></span> Zone III - Total Catchment</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid red; background-color: white; margin-right: 5px;"></span> Proposed Areas</li> </ul> <p>Copyright © and Database rights Environment Agency 2010. All rights reserved. Some of the information within the Flood Map is based in part on digital spatial data licensed from the Centre for Ecology and Hydrology © NERC.</p>
<p><b>Land Instability</b></p>	<p>No stability issues identified.</p>
<p><b>Sensitive Receptors</b> (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)</p>	<p>Residential properties lie in close proximity to the west of the area but are separated from the area by the railway line. Allotments lie to the south of the area.</p>
<p><b>Nature Conservation</b></p>	<p>Borough Site of Importance for Nature Conservation lies adjacent to west and north east corner of the area.</p>
<p><b>Green Belt and Open Space</b></p>	<p>Lee Valley Regional Park borders the area to the east. Within the Regional Park is an area of Green Belt Land which lies approximately 13m east of the area.</p>
<p><b>Historic Environment</b></p>	<p>Within the Lee Valley Archaeological Priority Area.- Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</p>

<b>Highways</b>	<p>Access is suitable for HGV traffic. However, there are known congestion issues at the Leaside Road/Watermead Way junction at peak periods.</p> <p>The area is considered suitable but details of access and egress would need to be considered as part of any future development proposals.</p>
<b>Conclusion</b>	
<b>Potential Uses</b>	Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, waste transfer, processing and recycling
<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, outdoor composting, indoor composting and in-vessel composting. The area is unlikely to be suitable for hazardous waste.
<b>General mitigation measures</b>	<p>There are a number of environmental issues facing the area such as the proximity of the area to a designated SINC. Undertaking appropriate ecological surveys and implementing appropriate measures to improve the biodiversity value of the area are therefore likely to be important mitigation measures. Consideration should be given to any potential impacts on air quality and measures such as negative air pressure and rapid-closure doors on any enclosed facility on the site and providing wheel washing facilities could help mitigate any potential impacts.</p> <p>In addition, as parts of the area are at a medium risk of flooding, 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. Measures to protect ground water will need to be agreed with the Environment Agency.</p>

**A22-HR – Friern Barnet Sewage Works (LEA 4) /Pinkham Way, Haringey**



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**Area Details**

<b>Borough</b>	Haringey
<b>Type of Location</b>	Area
<b>Location Reference</b>	A22-HR – Friern Barnet Sewage Works (LEA 4) /Pinkham Way
<b>Size</b>	5.95 ha
<b>Area Description</b>	Land is currently unused and has become over grown with trees and vegetation.
<b>Description of surrounding uses</b>	Pinkham Way and retail park to north, industrial properties east. Golf course south and a park and residential properties to the west.

**Planning Information**

<b>Planning Designation</b>	The Area is designated a Local Employment Area (LEA) and a Borough SINC.
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<b>Relevant Local Plan Policy</b>	<p>Former Friern Barnet Sewage Works / Pinkham Way Area has the following planning designations on the site: Site of Importance for Nature Conservation Grade 1, Local Employment Area: Employment Land, Flood Zone 2 and 3 (part).</p> <p>The area is subject to the following key Local Plan policies: - SP13: Open Space and Biodiversity, DM 20: Open Space and Green Grid, SP8: Employment, DM 37: Maximising the Use of Employment Land and Floorspace, and DM 24: Managing and Reducing Flood Risk</p>
<b>Land Use</b>	
<b>Co-location</b>	This Area would allow for co-location with complementary activities due to its size and highway accessibility.
<b>Major New Developments</b>	None identified locally
<b>Decentralised Energy Network</b>	<p>The Enfield potential Decentralised Energy area lies approximately 65m northeast of Friern Barnet.</p> <p>Not considered to be a practical option due to distance from potential users.</p> <p>Friern Barnet is in an area of low energy consumption (as Area undeveloped). Areas northeast, east and west of Area are high energy consumption zones.</p>
<b>Details of in-situ infrastructure</b>	None identified
<b>Constraints</b>	
<b>Flood Risk</b>	<p>The Area is largely within Flood Zone 1 with an area to the north of the Area falling partially within Flood Zones 2 and 3. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.</p> <p>Part of the Area is shown to flood from the Bounds Green Brook in the 1% AEP event (without defences) and this will potentially increase in the future as a result of climate change with 1% AEP event covering a greater extent of the site Area.</p> <p>A site specific flood risk assessment will therefore be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.</p>

<p><b>Surface and Groundwater</b></p>	<p>Not within a Source Protection Zone or principal aquifer. Bounds Green Brook lies approximately 40m north of Area. A pond lies approximately 10m west of Area and unnamed water course lies approximately 20m south of Area.</p>
<p><b>Land Instability</b></p>	<p>The Environment Agency records historic landfilling in the area. This may represent a ground stability issue and as such further investigation will be required at the planning application stage.</p>
<p><b>Sensitive Receptors</b> (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)</p>	<p>Residential properties lie west of Friern Barnet. Given the scale of the area there is scope to create a buffer around any waste management facility and orientate the facility away from residents.</p>
<p><b>Nature Conservation</b></p>	<p>Area is within a Borough Site of Importance for Nature Conservation which includes the adjacent Park and Golf Club. A number of ecology surveys have been undertaken and identified habitat of “potential value to a number of protected and notable species”. There is an ecological corridor to the east of the area along the railway embankment. Japanese Knotweed and Giant Hogweed have been identified in abundance across Area. There is currently no active management of the SINC.</p>
<p><b>Green Belt and Open Space</b></p>	<p>Land adjacent to the south and west of the area is designated as Metropolitan Open Land.</p>
<p><b>Historic Environment</b></p>	<p>No features identified</p>

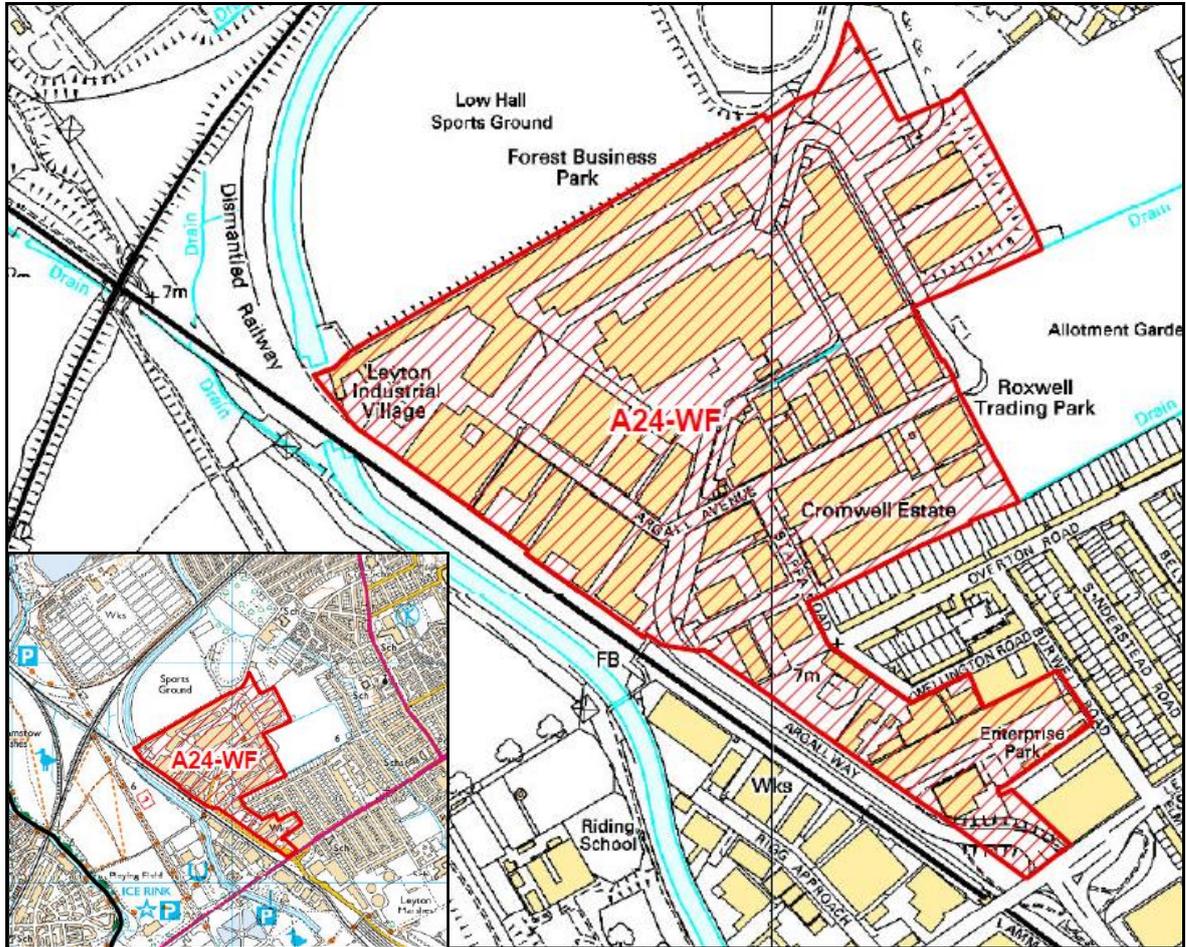
<b>Highways</b>	The Area would require the creation of an access to the roundabout on Orion Road/Pegasus Way. This would need to be designed to allow HGVs and refuse vehicles. The existing roundabout is suitable for these movements. Access to the North Circular is relatively easy from either Orion Road [heading east] or from Pegasus Way [to head west]. The Colney Hatch Lane/North Circular Road junction suffers from congestion at peak times. Use of the Area for waste would add to HGV/refuse vehicle movement but is unlikely to have a significant impact on the operation of this junction, based on 60 in/out movements per day for refuse vehicles plus 40 bulk transport in/out movements.
<b>Conclusion</b>	
<b>Potential Uses</b>	Waste transfer, Recycling, Composting, including indoor in-vessel composting and outdoor composting. Areas not lying within Flood Zone 3 are potentially suitable to handle hazardous waste.
<b>Uses unlikely to be suitable</b>	N/A
<b>Potential mitigation measures</b>	<p>The Area covers land owned separately by the North London Waste Authority and the London Borough of Barnet.</p> <p>There are a number of policy, environmental and amenity issues facing this area, although it previously accommodated a sewage treatment works. The Area has revegetated, contains a number of mature trees and is designated as a SINIC.</p> <p>Due to the number of designations affecting this Area, only a proportion of the overall area will be suitable for development. Given the land is in two ownerships and Barnet has no current plans to develop a waste facility, this is likely to impact on the deliverability of the site in its entirety. A smaller part of the site area in NLWA's single ownership is therefore most likely to accommodate any development. The location of new development within the Area will be assessed against flood risk criteria in the NPPF and a site-specific flood risk assessment will be required. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere</p> <p>Given the constraints on the Area, the site footprint should be minimised, taking into account the necessary operational</p>

	<p>elements of a waste facility, for example space for turning and parking for waste vehicles, processing area with sufficient room for equipment for waste treatment, and areas for the storage and stockpiling of materials. This should be on level areas where feasible.</p> <p>The location of new development should take the opportunity to create an appropriate buffer zone between the proposed facility and nearby sensitive receptors, including residential properties.</p> <p>Any new waste facility in this Preferred Location will need to be in line with the Haringey's Local Plan and the London Plan. There are community concerns around the development of a waste facility within this Area and how this will affect the natural environment, flood risk and biodiversity in the Area. Specific policy considerations on this topic are set out below. Consultation with the local community will be required for any proposed waste facility on this site.</p> <p>In line with London Plan policy G6: 'Biodiversity and access to nature', development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. In line with London Plan policy G7: 'Trees and Woodland', development proposals should ensure that, wherever possible, existing trees of value are retained.</p> <p>In line with Local Plan policy DM19: 'Nature Conservation', development proposals should protect and enhance the nature conservation value of the area. Development that has a direct or indirect adverse impact upon important ecological assets will only be permitted where the harm cannot be reasonably avoided and it has been suitably demonstrated that appropriate mitigation can address the harm caused.</p> <p>In line with London Plan Policy G6D, any development needs to achieve biodiversity net gain that leaves the biodiversity in a better state than before the development. This should be outside the areas at risk of flooding (Zone 2 and 3), suitably buffered from the ecological corridor to the east of the area, and subject to up-to-date Biodiversity and Wildlife surveys, be on land that is not identified as having priority species or habitats.</p> <p>An appropriate ecological survey will be required to identify significant ecological features to retain or replace. Consideration should be given to the retention and protection of existing mature trees and the designation and management of</p>
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	<p>appropriate areas of habitat to be retained and enhanced. Mitigation measures should include continued habitat connectivity with the adjacent green spaces and ecological corridor along the railway embankment that needs to be retained and enhanced.</p> <p>In line with Local Plan policy DM21: 'Sustainable Design, Layout and Construction', buildings within the development should be designed to complement nature conservation by maximising opportunities to enhance biodiversity, including through appropriate landscaping, Sustainable Drainage Systems, living roofs and green walls. Mitigation measures would be required to protect the amenity of sensitive receptors including hours of working, noise and odour suppression.</p> <p>Provision of an acceptable access <del>of</del> from Orion Road Roundabout would be required.</p> <p>Any application should demonstrate how public access to the remainder of the Area could be achieved.</p> <p>The Muswell Hill Golf Course Brook runs in culvert through the Pinkham Way Priority Area. Opening up the watercourse could bring multiple flood risk, biodiversity and amenity benefits and should be given consideration as site-specific development proposals are advanced.</p> <p>Any application will need to have regard to the needs of different users of the Area to ensure the safe operation of the waste management facility.</p> <p>A contamination and ground stability appraisal would be required to assess potential impacts from the historic landfill within the Area boundary.</p> <p>As parts of the Area fall within flood Zone 2 and 3, 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. Any necessary SuDS should be designed to integrate with other nature conservation elements.</p>
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**A24-WF – Argall Avenue, Waltham Forest**

1:6,950 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)



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**Area Details**

<b>Borough</b>	Waltham Forest
<b>Type of Location</b>	Area
<b>Location Reference</b>	A24-WF – Argall Avenue
<b>Size</b>	26.80 ha
<b>Area Description</b>	The area is an Industrial Estate.
<b>Description of surrounding uses</b>	There is a sports ground to the north, Lea Valley Park, allotments and residential properties to the east, industrial properties to the south and a railway line to the west.

**Planning Information**

<b>Planning Designation</b>	The area is a designated Strategic Employment Area (SEA) and lies within an Airfield Safeguarding Area.
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<b>Relevant Local Plan Policy</b>	Core Strategy: CS3, CS4, CS6, CS7, CS8, CS13 Development Management Policies: DM10, DM13, DM14, DM17, DM18, DM19, DM23, DM24, DM32, DM36
<b>Land Use</b>	
<b>Co-location</b>	Size of area would allow for co-location of facilities if plots became available.
<b>Major New Developments</b>	Argall Avenue is within an Opportunity Area and a Housing Zone as set out within the London Plan.
<b>Decentralised Energy Network</b>	Argall Avenue is within the Waltham Forest potential Decentralised Energy Area and is within the Hinterland Upper Lea Valley Opportunity Area.
<b>Details of in-situ infrastructure</b>	National Grid identify the following assets during consultation: <ul style="list-style-type: none"> <li>i. Intermediate Pressure Gas Distribution pipeline (pipeline ref NL0075 Lea Valley Viaduct to Leabridge).</li> <li>ii. Over Head Lines lie adjacent to the west of site, Hackney – Tottenham.</li> </ul>
<b>Constraints</b>	

**Flood Risk**

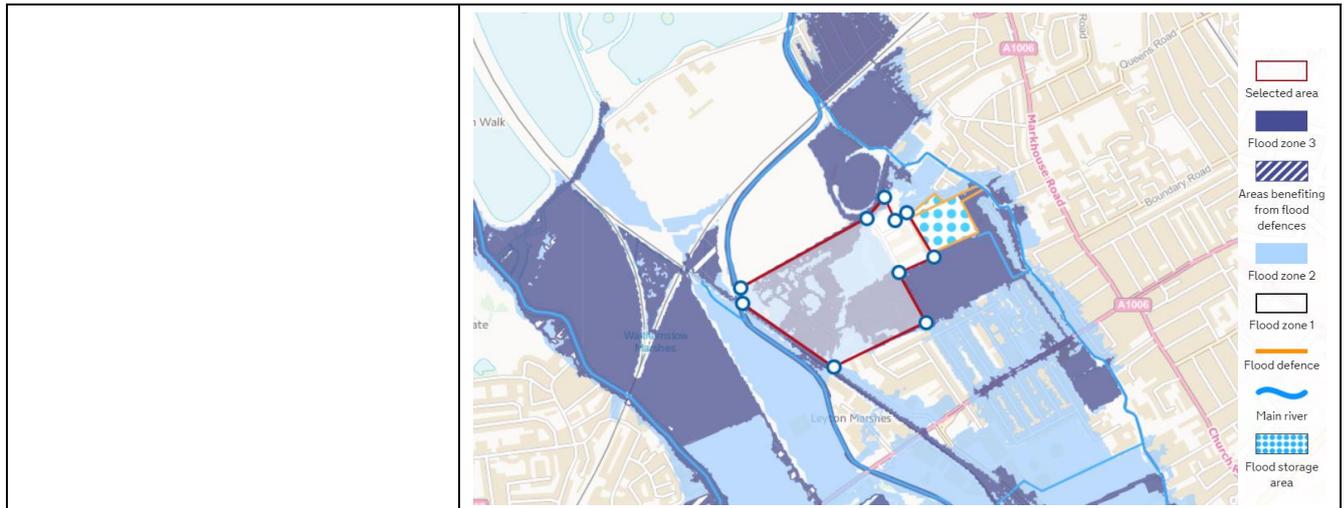
The site area falls partially within Flood Zone 1, Flood Zone 2 and Flood Zone 3. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.

However, development should be avoided on the part of the site area which lies within the functional floodplain.

The site area is shown to flood from the River Lee and Dagenham Brook in the 1% AEP event (without defences) and this will potentially increase with the future as a result of climate change with 1% AEP event covering a greater extent of the site area.

A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.

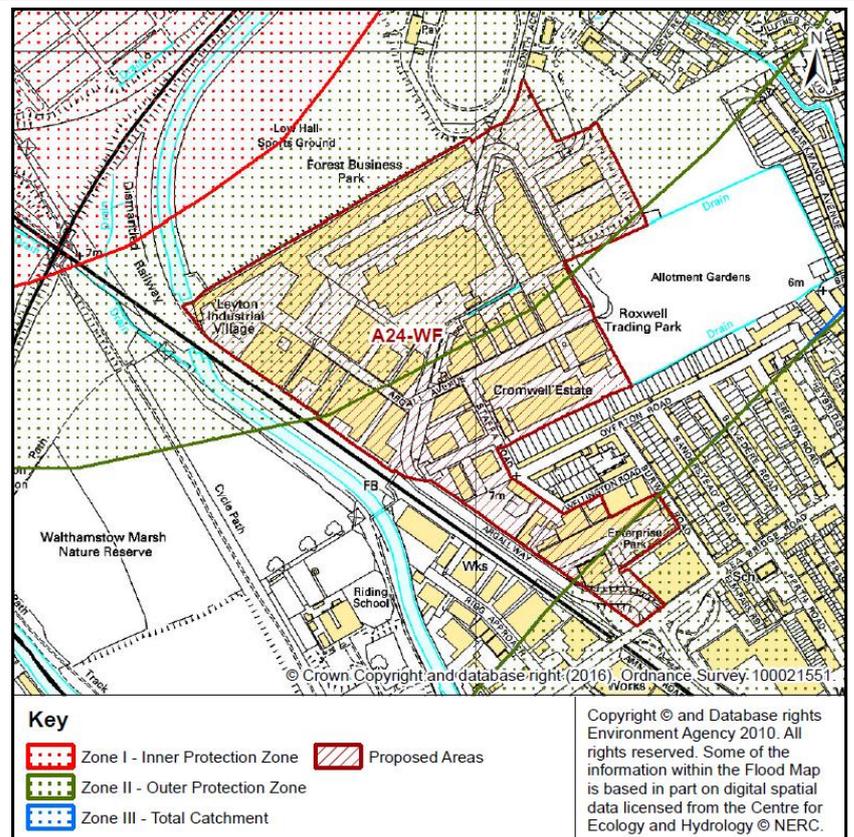
For any proposed development which involves an increase in built footprint within the modelled extent of the 1 in 100 chance in any year flood event, taking the impacts of climate change into account, or where the footprint has been moved into a deeper area of floodplain than the existing built footprint, floodplain compensation will need to be provided on a volume-for-volume and level-for-level basis.



**Surface and Groundwater**

Northern half and southern extent of Argall Avenue are within Source Protection Zone 2.

Lee Flood Relief Channel runs adjacent to the west of area. Dagenham Brook lies to the east of area.



**Land Instability**

An historic landfill lies adjacent to the north of area under Low Hall Sports ground.

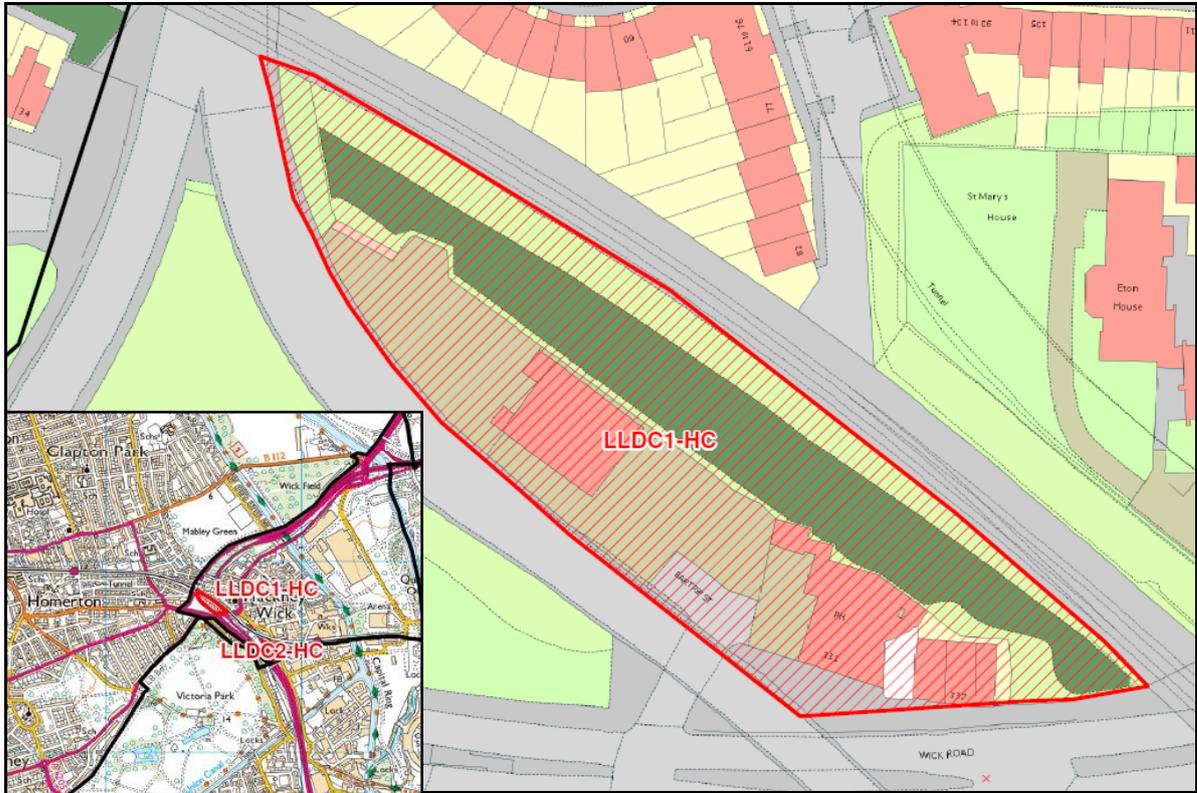
There is a potential for stability issues however Argall Avenue is completely developed which suggests any issue can be addressed. Further investigation will be required at the planning application stage.

<b>Sensitive Receptors</b> (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Residential dwellings lie to the south east of Argall Avenue and allotments to the east.
<b>Nature Conservation</b>	Low Hall Farm Borough Site of Importance for Nature Conservation (SINC) lies adjacent to the east of area.
<b>Green Belt and Open Space</b>	Walthamstow Marshes a designated Metropolitan Open Space lies adjacent to the north and west. The Lee Valley Regional Park borders the area to the north, northeast, south and west and covers the north east corner of area.
<b>Historic Environment</b>	Within the River Lea and Tributaries Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.
<b>Highways</b>	Capacity on Lea Bridge Road will be reduced as part of the Mini Holland cycle superhighway. Concerns raised over impact of increased traffic on air quality.
<b>Conclusion</b>	
<b>Potential Uses</b>	Waste transfer, indoor / in-vessel composting, processing and recycling. Areas not lying within Flood Zone 3 are potentially suitable to handle hazardous waste.
<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment and outdoor composting.
<b>General mitigation measures</b>	<p>There are a number of environmental and amenity issues facing the area such as the proximity of residential properties and the Lee Valley Regional Park which includes a Borough SINC and Metropolitan open land, as such the area is not suitable for external facilities. Facilities should therefore be enclosed and consideration should be given to siting any future proposals away from any sensitive receptors. Key mitigation measures should include dust suppression and other measures such as wheel-washing, negative air pressure and rapid-closure doors.</p> <p>Given the proximity of a borough SINC, any future planning application should include an assessment of the areas ecological value and potential impacts from development. Developments adjacent the Lee Valley Regional Park should include mitigation measures such as appropriate landscaping and/or planting and incorporate appropriate boundary treatments or park improvements to protect the recreational potential of the park.</p> <p>As parts of the area are at a medium to high risk of flooding, the completion of a suitable Flood Risk Assessment, and the incorporation of SuDS or other techniques to manage surface</p>

	<p>water runoff will be key mitigation measures. Appropriate measures should also be incorporated to prevent any contamination of groundwater or adjacent watercourses.</p> <p>As the area has poor air quality an air quality impact assessment will be a key mitigation measure.</p>
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### LLDC1-HC – Bartip Street LSIS, Hackney

1:950 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)



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#### Area Details

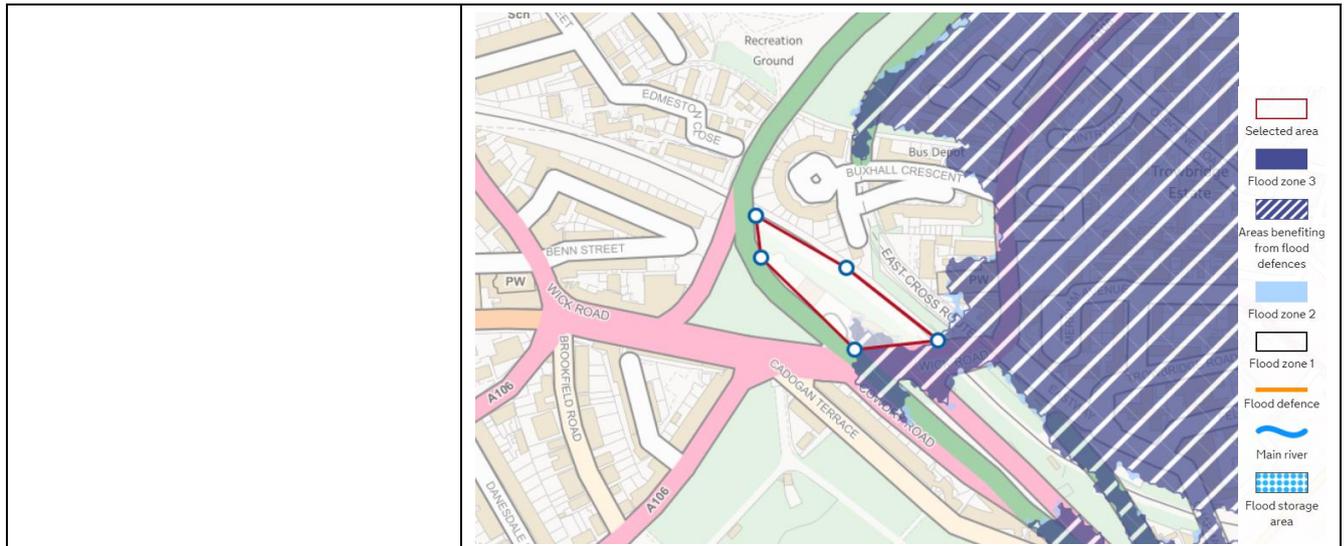
<b>Borough</b>	Hackney
<b>Type of Location</b>	Area
<b>Location Reference</b>	LLDC1-HC – Bartip Street LSIS
<b>Size</b>	0.60 ha
<b>Area Description</b>	Area contains small scale industrial, storage and distribution uses and residential
<b>Description of surrounding uses</b>	The area is bound on all sides by road and railway lines. There is some green space to the south west. Residential properties and a church lie in close proximity.

#### Planning Information

<b>Planning Designation</b>	Area is designated as a Locally Significant Industrial Site (LSIS) and lies within an Airfield Safeguarding Area.
<b>Relevant Local Plan Policy</b>	Policy B.1, London Legacy DC Local Plan Policy IN.2 London Legacy DC Local Plan

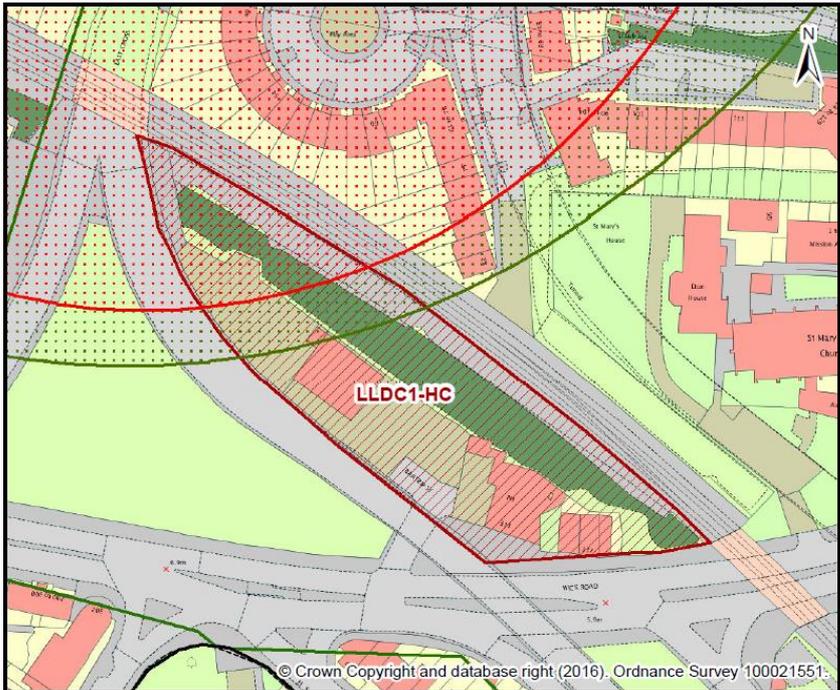
#### Land Use

<b>Co-location</b>	No, area is too small for co-location
<b>Major New Developments</b>	Bartip St LSIS is within an Opportunity Area as set out in the London Plan.
<b>Decentralised Energy Network</b>	The area is partly within Hackney Wick potential Decentralised Energy area.
<b>Details of in-situ infrastructure</b>	None identified
<b>Constraints</b>	
<b>Flood Risk</b>	<p>The site area is largely within Flood Zone 1 with the southern most part falling partially within Flood Zones 2 and 3, noting that the Flood Zone 3 is within an area benefiting from defence. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.</p> <p>The site area is shown to flood from the River Lea / Lee Navigation in the 1% AEP event (without defences) and this will potentially increase in the future as a result of climate change with 1% AEP event covering a greater extent of the site. The River Lea / Lee Navigation benefits from defences and a site-specific flood risk assessment should consider how much these benefit the site area.</p> <p>A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.</p> <p>Part of the site area benefits from existing flood defences.</p>



**Surface and Groundwater**

The north of area is within Source Protection Zone 1 and 2. Facilities within Source Protection Zone 1 should only deal with inert waste unless otherwise agreed with the Environment Agency.



<b>Key</b>	Zone I - Inner Protection Zone	Proposed Areas
	Zone II - Outer Protection Zone	
	Zone III - Total Catchment	

Copyright © and Database rights Environment Agency 2010. All rights reserved. Some of the information within the Flood Map is based in part on digital spatial data licensed from the Centre for Ecology and Hydrology © NERC.

**Land Instability**

No issues identified.

**Sensitive Receptors** (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)

Residential properties and a church lie in close proximity to the site. A Gypsy and traveller site is located to the south of the site (Allocation SA1.9 in the LLDC Local Plan).

**Nature Conservation**

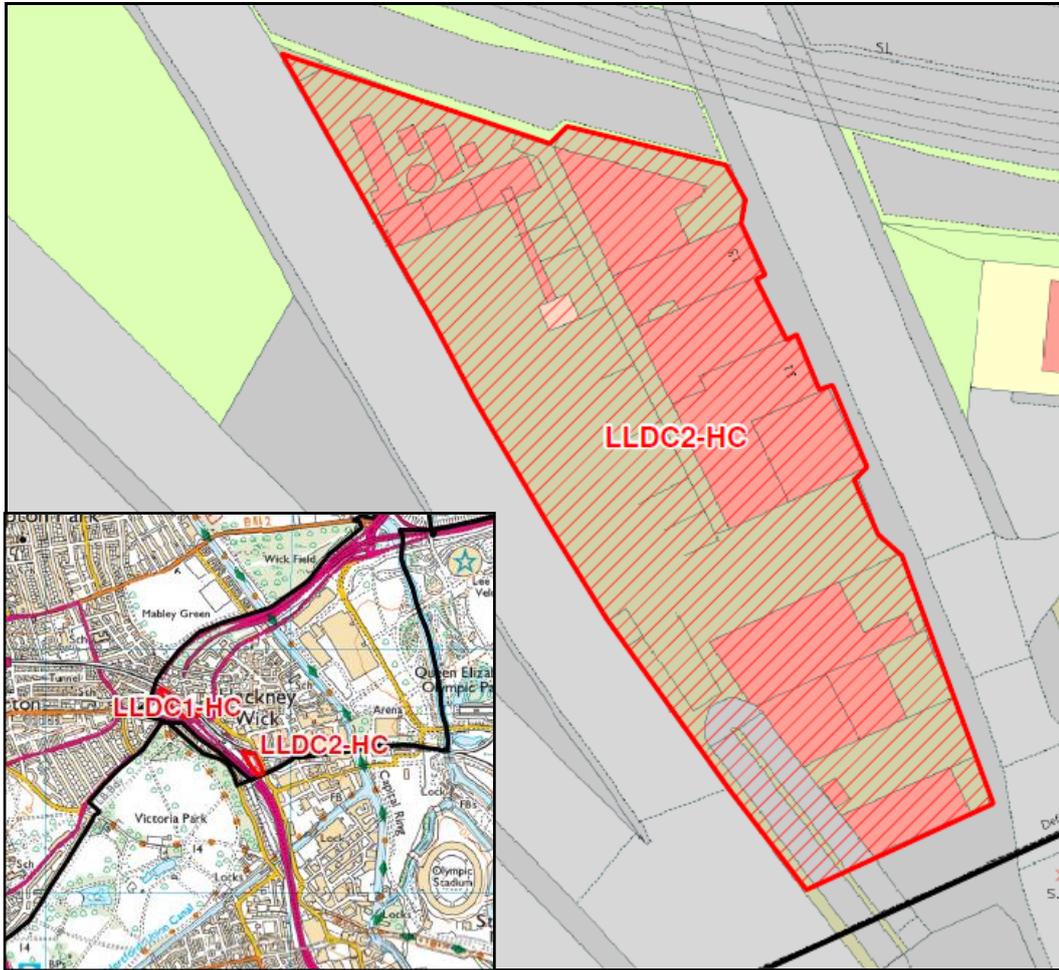
No features identified

<b>Green Belt and Open Space</b>	Metropolitan Open Land lies 100m to the north of the area.
<b>Historic Environment</b>	<p>Four listed buildings lie to the north east within 100m of the area:</p> <ul style="list-style-type: none"> <li>• Grade II listed Church of St Mary of Eton with St Augustine,</li> <li>• Grade II listed Eton House,</li> <li>• Grade II listed Mission Hall to North of Church of St Mary of Eton and</li> <li>• Grade II listed Tower to North of Church of St Mary of Eton.</li> </ul> <p>Historic England has noted that the setting of Victoria Park Registered Park and Garden and Conservation Area to the south should be considered.</p>
<b>Highways</b>	<p>The A12 is associated with significant air pollution. An air quality impact assessment would be required as part of any future planning application.</p> <p>Access to the area is off Wick Road which forms part of the Transport London Road Network; as such Transport for London should be consulted on any future development proposals.</p>
<b>Conclusion</b>	
<b>Potential Uses</b>	Waste transfer, processing and recycling. Areas not within Flood Zone 3 or Source Protection Zone 1 are potentially suitable to handle hazardous waste.
<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, Thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment, outdoor composting, indoor composting and in-vessel composting.
<b>Potential mitigation measures</b>	<p>There are amenity issues facing the area such as the proximity of residential properties and a travellers site, as such the area is not suitable for external facilities. Facilities should therefore be enclosed. As necessary an assessment of ecological value of the area should be included as part of any future planning application. Key mitigation measures should include dust suppression and other measures such as wheel-washing, negative air pressure and rapid-closure doors.</p> <p>Parts of the area are at medium to high risk of surface water flooding the completion of a Flood Risk Assessment and inclusion of SuDs or other appropriate techniques to manage surface water runoff will be key mitigation measure. Appropriate measures should also be incorporated to prevent any contamination of groundwater</p> <p>An appraisal to assess impact of new structures on the historic environment will be required. Building design should be sympathetic to the historic setting.</p>

	As proposals may increase the level of traffic generated within the area an air quality impact assessment will be a key mitigation measure.
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**LLDC2-HC – Chapman Road LSIS (Formerly Palace Close SIL), Hackney**

**1:800 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)**



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**Area Details**

<b>Borough</b>	Hackney
<b>Type of Location</b>	Area
<b>Location Reference</b>	LLDC2-HC – Chapman Road LSIS
<b>Size</b>	0.33 ha
<b>Area Description</b>	The area is occupied by industrial properties.
<b>Description of surrounding uses</b>	The area is bound to the west by the A12 and to the east by Chapman Road. There is a gypsy and traveller site to the east with industrial uses beyond. The area is bound to the north by a railway line.

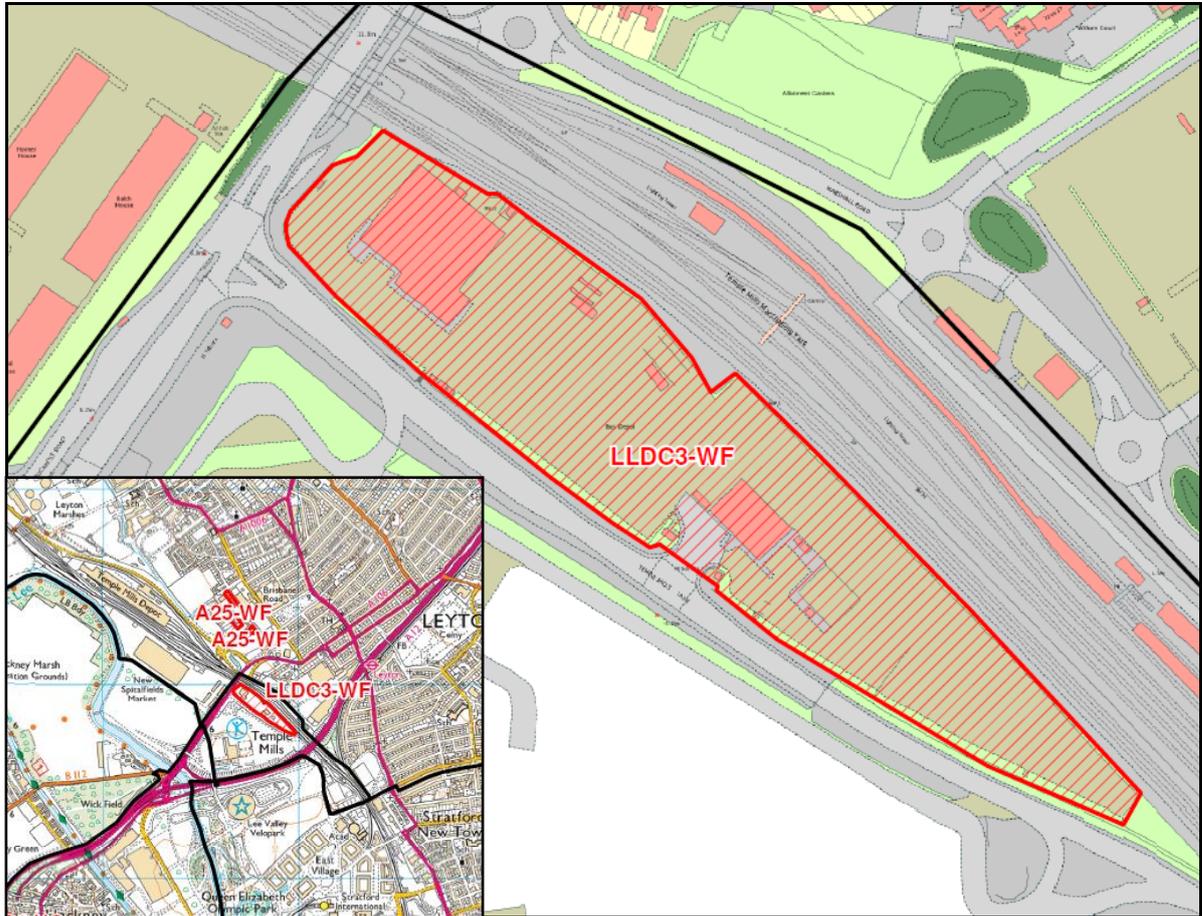
Planning Information	
<b>Planning Designation</b>	Area is designated as a Locally Significant Industrial Site (LSIS)
<b>Relevant Local Plan Policy</b>	Policy B.1, London Legacy DC Local Plan Policy IN.2 London Legacy DC Local Plan
Land Use	
<b>Co-location</b>	No the area is too small to contain more than one use.
<b>Major New Developments</b>	Chapman Road LSIS lies within an Opportunity Area as set out within the London Plan.
<b>Decentralised Energy Network</b>	The area is approximately 500m from an existing Decentralised Heat Network and is within the Hackney Wick potential Decentralised Energy area.
<b>Details of in-situ infrastructure</b>	None identified
Constraints	
<b>Flood Risk</b>	<p>The site area falls partially within Flood Zone 1 and 2 but is largely in Flood Zone 3, noting that this is within an area benefiting from defences. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.</p> <p>The site area is shown to flood from the River Lea / Lee Navigation in the 1% AEP event (without defences) and this will potentially increase in the future as a result of climate change with 1% AEP event covering a greater extent of the site area. The River Lea / Lee Navigation benefits from defences and a site-specific flood risk assessment should consider how much these benefit the site area.</p> <p>A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.</p> <p>The majority of the site area benefits from existing flood defence.</p>



	<p>enclosed. As necessary an assessment of ecological value of the area should be included as part of any future planning application. Key mitigation measures should include dust suppression and other measures such as wheel-washing, negative air pressure and rapid-closure doors.</p> <p>The area is at a high risk of surface water flooding the completion of a Flood Risk Assessment and inclusion of SuDs or other appropriate techniques to manage surface water runoff will be key mitigation measure.</p> <p>An appraisal to assess impact of new structures on the historic environment will be required. Building design should be sympathetic to the historic setting.</p> <p>As proposals may increase the level of traffic generated within the area an air quality impact assessment will be a key mitigation measure.</p>
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**LLDC3-WF – Bus Depot, Temple Mills Lane, Waltham Forest**

**1:2,150 map of area showing outline over MasterMap base layer (inset map is of scale 1:25,000)**



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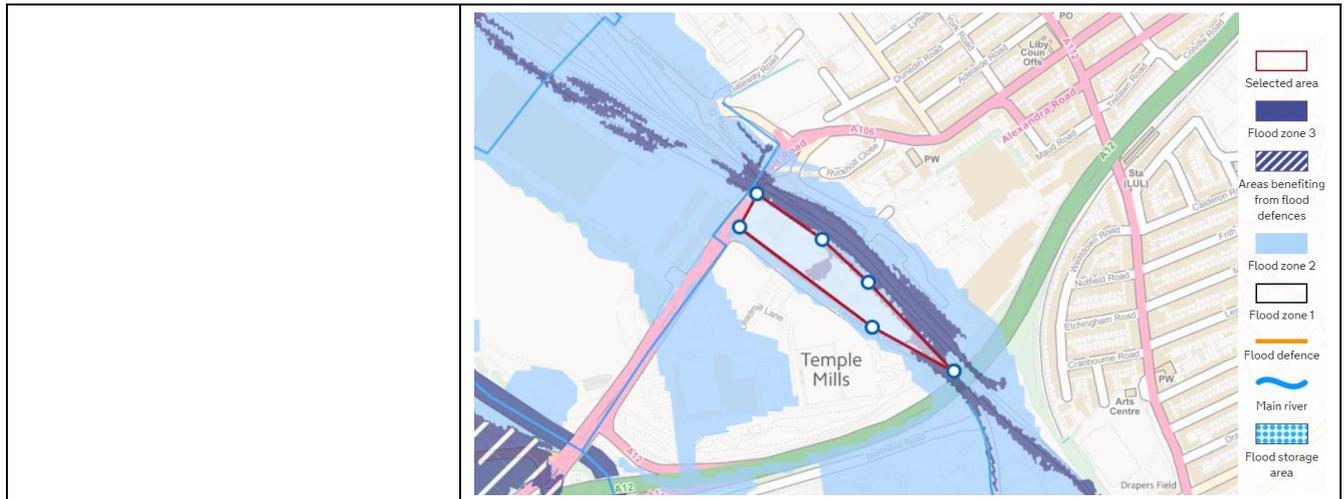
**Area Details**

<b>Borough</b>	Waltham Forest
<b>Type of Location</b>	Area
<b>Location Reference</b>	LLDC3-WF – Bus Depot, Temple Mills Lane
<b>Size</b>	2.1 ha
<b>Area Description</b>	Bus Depot
<b>Description of surrounding uses</b>	Railway lines border the north and east of the area with residential properties, allotments and retail beyond, Easton Park and New Spitalfields Market lie to the south. The Lee Valley Regional Park lies adjacent to the south of the area.

**Planning Information**

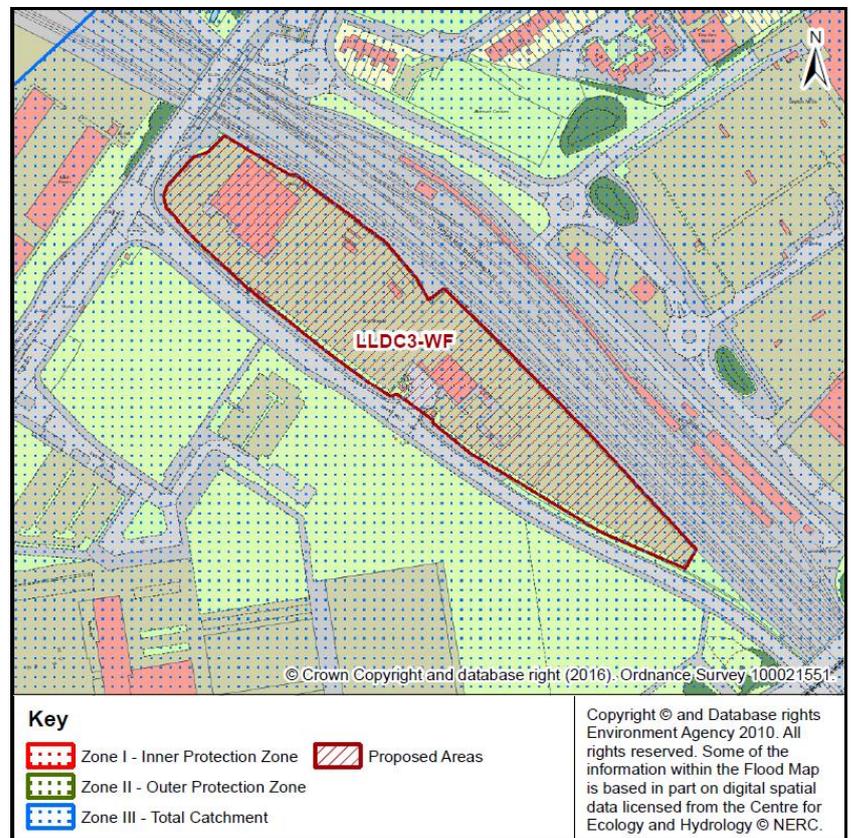
<b>Planning Designation</b>	Area is designated as a Locally Significant Industrial Site (LSIS). The area is within an Airfield Safeguarding Area.
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<b>Relevant Local Plan Policy</b>	Policy B.1, London Legacy DC Local Plan Policy IN.2 London Legacy DC Local Plan
<b>Land Use</b>	
<b>Co-location</b>	The area is potentially large enough to accommodate more than one facility.
<b>Major New Developments</b>	The depot lies within an Opportunity Area and a Housing Zone lies approximately 15m north as set out in the London Plan. The area is within the 2012 Olympic Legacy Park.
<b>Decentralised Energy Network</b>	There is an existing Decentralised Heat Network approximately 320m southwest of area.
<b>Details of in-situ infrastructure</b>	None identified
<b>Constraints</b>	
<b>Flood Risk</b>	<p>The site area is largely Flood Zone 2 with a small area of Flood Zone 3. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.</p> <p>The site area is shown to flood from the River Lee and Dagenham Brook in the 1% AEP event (without defences) and this will potentially increase with the future as a result of climate change with 1% AEP event covering a greater extent of the site area.</p> <p>A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.</p> <p>For any proposed development which involves an increase in built footprint within the modelled extent of the 1 in 100 chance in any year flood event, taking the impacts of climate change into account, or where the footprint has been moved into a deeper area of floodplain than the existing built footprint, floodplain compensation will need to be provided on a volume-for-volume and level-for-level basis.</p>



**Surface and Groundwater**

Area lies within Source Protection Zone 2



**Land Instability**

An historic landfill lies adjacent to the north of area under Spitalfields Market.

There is potential for stability issues however the area of the landfill is completely developed which suggests any issue can be addressed. Further investigation will be required at the planning application stage.

**Sensitive Receptors** (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)

Eaton park lies 10m south of the area and New Spitalfields Market lie 30m west of the area. Housing and allotments lie 70m north of the area but they are screened by railway lines.

<b>Nature Conservation</b>	No features identified
<b>Green Belt and Open Space</b>	Eaton Manor Metropolitan Open Land lies 10m south of the area which lies within the Lee Valley Regional Park.
<b>Historic Environment</b>	No features identified
<b>Highways</b>	There is concern that the vehicles which will transport waste would result in further congestion on the roads and increase pollution throughout the Borough.
<b>Conclusion</b>	
<b>Potential Uses</b>	Waste transfer, enclosed anaerobic Digestion, processing and recycling. Areas not within Flood Zone 3 are potentially suitable to handle hazardous waste.
<b>Uses unlikely to be suitable</b>	Integrated resource recovery facilities/resource parks, Thermal treatment, mechanical biological treatment, pyrolysis / gasification, indoor composting, outdoor composting and in-vessel composting.
<b>General mitigation measures</b>	<p>There are amenity issues facing the area such as the proximity of Eaton Park, Spitalfields Market and residential properties, as such the area is not suitable for external facilities. Facilities should therefore be enclosed. As necessary an assessment of ecological value of the area should be included as part of a planning application. Key mitigation measures should include dust suppression and other measures such as wheel-washing, negative air pressure and rapid-closure doors. Mitigation measures along the boundary with the park should also include appropriate landscaping and/or planting and incorporate appropriate boundary treatments or park improvements to protect the recreational potential of the park.</p> <p>Parts of the area are at a medium or high risk of surface water flooding the completion of a Flood Risk Assessment and inclusion of SuDs or other appropriate techniques to manage surface water runoff will be key mitigation measure. Appropriate measures should also be incorporated to prevent any contamination of groundwater.</p> <p>As proposals may increase the level of traffic generated within the area an air quality impact assessment will be a key mitigation measure.</p>



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# **Report to the Councils of the London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest**

**by Stephen Normington BSc DipTP MRICS MRTPI FIQ FIHE**  
an Inspector appointed by the Secretary of State

Date: 27 October 2021

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

## **Report on the Examination of the North London Waste Plan**

The Plan was submitted for examination on 8 August 2019

The examination hearings were held between 20 and 21 November 2019

File Ref: PINS/X5210/429/13.

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## Abbreviations used in this report

CEP	Circular Economy Package
C&D	Construction and Demolition Waste
CD&E	Construction, Demolition and Excavation Waste
C&I	Commercial and Industrial Waste
DCO	Development Consent Order
DtC	Duty to Co-operate
EqIA	Equality Impact Assessment
ERF	Energy Recovery Facility
GLA	Greater London Authority
HRA	Habitats Regulations Assessment
JWS	Joint Waste Strategy
LACW	Local Authority Collected Waste
LEA	Local Employment Area
LES	London Environment Strategy
LLDC	London Legacy Development Corporation
LLW	Low Level Radioactive Waste
LSIS	Locally Significant Industrial Land
MM	Main Modification
NLWA	North London Waste Authority
NPPF	National Planning Policy Framework
NPPW	National Planning Policy for Waste
ROCs	Renewable Obligations Certificates
RRCs	Recycling and Reuse Centres
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCIs	Statements of Community Involvement
SFRA	Strategic Flood Risk Assessment
SIL	Strategic Industrial Land
SINC	Sites of Importance for Nature Conservation
SPA	Special Protection Area

## Non-Technical Summary

This report concludes that the North London Waste Plan (the Plan) provides an appropriate basis for waste planning within the London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest (the Borough Councils) provided that a number of main modifications [MMs] are made to it. The Borough Councils have specifically requested that I recommend any MMs necessary to enable the Plan to be adopted.

Following the hearings, the Borough Councils prepared schedules of the proposed modifications and, where necessary, carried out Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) of the changes. The MMs were subject to public consultation over a six-week period. I have recommended the inclusion of the MMs in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Amending the Aims and Strategic Objectives of the Plan to ensure general conformity with the London Plan.
- Amendments to Section 4 of the Plan to ensure that the approach to the management of waste over the Plan period and the identification of the location for new facilities are consistent with Aims and Strategic Objectives.
- Ensuring that the evidence and the calculation methodology for the identified waste that needs to be managed in the Plan area and over the Plan period is fully justified and explained.
- Ensuring that the selection process to identify areas to manage the identified waste needs over the Plan period is consistent with the spatial principles of the Plan and fully justified and explained.
- Ensuring that the methodology and justification for the identification of Preferred Areas for the management of North London's waste over the Plan period are justified and explained.
- Ensuring that the Plan's policies ensure that waste management development proposals provide an adequate balanced approach to protect people and the environment whilst delivering the aims, strategic objectives and spatial principles of the Plan.
- Revising the monitoring and implementation framework to provide a more robust mechanism to assess the delivery of the Plan against its aims, strategic objectives and spatial principles.

- Revising the guidance in Appendix 2 regarding the detailed development requirements to accompany any future planning applications for waste management development within the identified Priority Areas.
- A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

## Introduction

1. This report contains my assessment of the Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended) (the 2004 Act). It considers first whether the Plan is in general conformity with the Spatial Development Strategy i.e. the London Plan. It then considers whether the Plan's preparation has complied with the Duty to Co-operate (DtC), whether the Plan is compliant with the legal requirements and whether it is sound. Paragraph 35 of the National Planning Policy Framework 2021 (NPPF) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the Borough Councils have submitted what they consider to be a sound plan. The North London Waste Plan Regulation 19 Proposed Submission - January 19 (CD1/1), submitted in August 2019 is the basis for my examination. It is the same document as was published for consultation in March 2019.

## Main Modifications

3. In accordance with section 20(7C) of the 2004 Act, the Borough Councils requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed MMs and, where necessary, carried out sustainability appraisal and habitats regulations assessment of them. The MM schedule was subject to public consultation for six weeks in October-December 2020. I have taken account of the consultation responses in coming to my conclusions in this report.

## Policies Map

5. The Plan when adopted will require changes to the Borough Councils Policies Maps. The Plan does not include its own Policies Map. Each of the Borough Councils have their own Policies Map that relates to all the

planning documents in their Local Development Framework, including this Plan.

6. The Policies Maps are not defined in statute as development plan documents and so I do not have the power to recommend main modifications to them. However, to ensure that the Plan is effective, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the Policies Map of the relevant Borough Council. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Borough Councils will need to update the adopted Policies Maps to include all the changes proposed by the MMs.

## **Context of the Plan**

7. The Plan is intended to provide the policy framework for decisions by the seven North London Boroughs on waste matters over the period to 2035. Each of the seven North London Boroughs have strategic waste policies contained within their adopted Local Plan. However, the strategic waste policies defer to this Plan to provide a more detailed planning framework for waste development.
8. One of the key tasks is to meet the apportionment set out in the London Plan (2021). This projects how much Local Authority Collected Waste (LACW) and Commercial and Industrial Waste (C&I) is likely to be generated in London up to 2041. It apportions a percentage share of these two waste streams to be managed by each London Borough with an objective that the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026.
9. Each of the seven North London Boroughs have pooled their apportionments and propose to meet this collectively through existing sites and land allocated in the Plan. The Plan has two main purposes:
  - to ensure there will be adequate provision of suitable land to accommodate waste management facilities of the right type, in the right place and at the right time up to 2035 to accommodate the amount of waste required to be managed in North London; and
  - to provide policies against which planning applications for waste development will be assessed.
10. The majority of existing waste management sites are located in the east of the Plan Area, in particular in the Lee Valley corridor. The Plan is therefore underpinned by a need to secure a better geographical spread of waste management sites across North London and an objective to achieve net self-sufficiency for LACW, C&I, Construction and Demolition (C&D) waste and hazardous waste streams.

11. The Plan area also includes part of the London Legacy Development Corporation (LLDC), a Mayoral Development Corporation, which is the planning authority for a small part of Hackney and Waltham Forest and other Boroughs that are not part of the North London Borough Councils. The LLDC is not allocated a share of the waste apportionment and the Plan is required to provide the planning policy framework for waste generated across the whole of the seven Borough's, including the parts of Hackney and Waltham Forest that lie within the LLDC Area.
12. The Plan cannot directly allocate sites/areas within the LLDC area as this is the responsibility of LLDC as local planning authority. However, a Memorandum of Understanding is in place that enables sites/areas identified as being suitable for waste management uses in the Plan in those parts of Hackney and Waltham Forest in the LLDC area to be allocated in the LLDC Local Plan.

## **General conformity with the London Plan**

13. The Plan must be in general conformity with the Spatial Development Strategy i.e. the London Plan, under the terms of S24 of the Planning & Compulsory Purchase Act 2004 (as amended) (2004 Act). The London Plan 2016, which was in place at the time of the submission of the Plan and for most of the examination, has now been replaced by the London Plan published in March 2021 (the London Plan 2021).
14. Some of the proposed MMs and parts of the Data Study Addendum (CD1/23) are in response to the requirements of adopted London Plan 2021 Policies SI 7 (Reducing waste and supporting the circular economy), SI 8 (Waste capacity and waste net self-sufficiency) and SI 9 (Safeguarded waste sites). The relevant MMs are discussed later in this report.
15. Subject to the necessary MMs, the Mayor of London, in a letter dated 17 March 2021, confirmed that the Plan is in general conformity with the London Plan 2021 (CD1/16/MM).

## **Revised National Planning Policy Framework**

16. On 20 July 2021 the Government published revisions to the NPPF. This was after the close of the consultation period on the MMs and before the issue of this report. In accordance with Paragraph 220, policies in the revised NPPF apply to all plans that were submitted for examination after 24 January 2019 and consequently its provisions apply to this Plan. The Boroughs and those parties who made representations at the consultation stage of the MMs were invited to submit any comments on the implications of the revised NPPF that may be relevant to the consideration of the soundness of the Plan.
17. Overall, the revised NPPF has no significant implications for the aims, strategic objectives or policies proposed in the Plan. However, the

Boroughs have proposed minor revisions to supporting text provided in paragraphs 4.26, 9.41 and 9.48 of the Plan. These paragraphs are already subject to proposed MMs (**MM11**, **MM93** and **MM96** respectively). The proposed modifications as a consequence of the revised NPPF have been incorporated into these MMs.

18. The necessary changes to the MMs are limited to a reference to "ultra-low and zero emission vehicles", in the case of paragraphs 4.26 and 9.41, and reference for development to make "as much use as possible of natural flood management techniques and be appropriately flood resistant and resilient" in the case of paragraph 9.48.
19. I consider that the suggested changes to the MMs are minor and do not necessitate any further public consultation. I have discussed these changes in the context of the consideration of the relevant MMs below.
20. Any references to the NPPF in this report relate throughout to the revised NPPF published on 20 July 2021 unless otherwise stated.

## **Public Sector Equality Duty**

21. Throughout the examination, I have had due regard to the equality impacts of the Plan in accordance with the Public Sector Equality Duty, contained in Section 149 of the Equality Act 2010. The Equality Impact Assessment (January 2019) (EqIA) (CD1/17) identifies that the Plan does not lead to any adverse impacts or cause discrimination to any particular groups within the Plan area.
22. I have detected no issue that would be likely to impinge upon the three aims of the Act to eliminate discrimination, advance equality of opportunity and foster good relations or affect persons of relevant protected characteristics of age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. Overall, I have no reason to question the conclusions of the submitted EqIA that the Plan is not expected to discriminate against any sections of the community.

## **Assessment of Duty to Co-operate**

23. Section 20(5)(c) of the 2004 Act requires that I consider whether the Borough Councils have complied with any duty imposed on them by section 33A in respect of the Plan's preparation. When preparing the Plan the Borough Councils are required to engage constructively, actively and on an on-going basis with a range of local authorities and a variety of prescribed bodies in order to maximise the effectiveness of plan preparation with regard to strategic, cross-boundary matters.
24. Details of how the Borough Councils have met this duty are set out in the 'Duty to Co-operate Report (August 2019)' (CD1/12), the 'Consultation Statement (August 2019)' (CD1/3) and the Borough

Councils' written responses to pre-hearing questions (CD5/9). These documents set out where, when, with whom and on what basis co-operation has taken place over all relevant strategic matters.

25. The evidence demonstrates that the Borough Councils have worked closely with neighbouring waste planning authorities, as well as some further afield where a strategic relationship was identified, throughout the plan-making process.
26. Also evident is the effective relationship the Borough Councils have established and maintained with all of the relevant bodies listed in Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). In addition, consultation has taken place with a wide range of organisations and bodies as part of the formal consultation process. It is clear that many of the pre-submission changes to the Plan that were brought forward by the Borough Councils were as a result of consultation with relevant parties to address their concerns in a constructive and active manner.
27. It should be emphasised that the Duty to Co-operate (DtC) is not a duty to agree. Consequently, it is quite possible for it to be complied with, but for there to be outstanding matters between the Borough Councils and other bodies. However, those matters do not lie with the DtC but with the content of the Plan which is addressed elsewhere in this report. Those disputes may relate to matters regarding the soundness of the Plan, but an unresolved dispute is not evidence of a failure in the DtC.
28. Overall, I am satisfied that, where necessary, the Borough Councils have engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the DtC has therefore been met.

## **Assessment of Other Aspects of Legal Compliance**

### **Local Development Scheme**

29. The Plan has been prepared in accordance with the Local Development Schemes of the Borough Councils (CD1/15). All of these schemes share the same content and timetable for the production of the Plan.

### **Public consultation and engagement**

30. During various stages of Plan preparation, consultation on the Plan and the MMs was carried out in compliance with the adopted Statements of Community Involvement (SCIs) for each of the Borough Councils. The requirements of these SCIs were reflected in the Plan Consultation Protocol (CD1/18). The Consultation Statement – August 2019 (CD1/3) and the Consultation Report – Main Modifications Consultation – March 2021 (CD1/3/MM) provide evidence of how community involvement has been achieved.

## **Sustainability Appraisal**

31. The Plan was subject to Sustainability Appraisal (SA) during its preparation (CD1/2). Addendums to the SA were also produced to inform the proposed main modifications (CD1/2/Add and CD1/2/Add-MM). No statutory consultees have raised any significant concerns about the sustainability appraisal process.
32. Overall, I am satisfied that the sustainability appraisal was proportionate, objective, underpinned by relevant and up to date evidence, and compliant with legal requirements and national guidance.

## **Habitats Regulations Assessment**

33. The Plan was subject to a Habitats Regulations Assessment (HRA) during its preparation (CD1/14) as required by the Conservation of Habitats and Species Regulations 2017 (as amended). The HRA identifies that the Plan is compliant with the Habitats Regulations and will not result in likely significant effects on any of the Natura 2000 Sites identified, either alone or in combination with other plans and projects in the Plan area.
34. The assessment considered the effect of the implementation of the Plan on European protected sites within 10km of the Plan area which includes the Lea Valley Special Protection Area (SPA) and RAMSAR site, Epping Forest Special Area of Conservation (SAC) and the Wormley-Hoddesdon Park SAC.
35. A HRA Addendum – September 2020 (CD1/14/Add) assessed the MMs to consider whether they affect the conclusions set out in the main HRA of November 2019. This identified that the MMs do not have any implications for the HRA.
36. Both Assessments conclude that any potential harmful impacts on the nature conservation value of European sites that could arise from the implementation of the Plan can be avoided or mitigated and identifies that Policy 5 of the Plan provides an important safeguard for European sites in this regard. No statutory consultees or other relevant organisations dispute the findings of the HRAs. Therefore, I am satisfied that the relevant legal requirements relating to Habitats Regulations Assessment have been met.

## **Climate Change**

37. Section 19(1A) of the 2004 Act requires that development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the Plan area contribute to the mitigation of, and adaptation to, climate change. The Plan includes objectives and policies designed to secure that waste development and

use of land for such purposes within the Plan area contribute to the mitigation of, and adaptation to, climate change (Strategic Objectives 6 and 7 and Policies 5 and 6).

38. The Flood Risk Sequential Test Report (CD1/11) is informed by information contained within each of the Borough's Strategic Flood Risk Assessments (SFRA) and Surface Water Management Plans which take into account all the sources of flooding within the Plan area. This report, and the Flood Risk Addendum (CD1/11/Add), demonstrate how the Sequential Test has been applied to the proposed waste management sites/areas in the Plan and identifies how the Plan has satisfied the NPPF's requirements in regard to flood risk and the consideration of the impact of flood risk elsewhere as a result of proposed development.
39. Subject to **MM4**, which is discussed below, Policies 5 and 6 will help to ensure that the development and use of land will contribute to the mitigation of, and adaptation to, climate change. Accordingly, the Plan, taken as a whole, achieves the statutory objective prescribed by Section 19(1A) of the 2004 Act.

### **Strategic priorities**

40. The Plan's aims and strategic objectives set out the Borough Councils' high level strategic priorities. These are then addressed through the subsequent policies for waste development and use of land for such purposes in the Plan area.

### **Other legal requirements**

41. The Plan complies with all other relevant legal requirements, including the 2004 Act (as amended) and the 2012 Regulations.

### **Conclusion**

42. I therefore conclude that all relevant legal requirements have been complied with during the preparation of the Plan.

## **Assessment of Soundness**

### **Main Issues**

43. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified eight main issues upon which the soundness of this Plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan.

### **Issue 1 – Whether the Aims and Strategic Objectives of the Plan are in general conformity with the London Plan, are appropriate and**

**sound to provide a suitable basis for meeting the future waste management needs of North London sustainably.**

44. The Plan sets out the preferred option for how the waste management needs of the seven North London Boroughs are to be met to 2035 for principal waste streams comprising LACW, C&I, Construction, Demolition and Excavation (CD&E), Hazardous, Agricultural, Waste Water/Sewage Sludge and Low level radioactive waste (LLW). It seeks the retention and provision of a network of waste management facilities to enable the sustainable management of waste to achieve net waste self-sufficiency.
45. The Plan's purpose is to ensure an adequate provision of suitable land to accommodate waste management facilities of the right type, in the right place and the right time up to 2035 and to provide policies against which planning applications for waste development will be assessed. It includes a single overarching aim and a number of strategic objectives that provide the basis for waste management infrastructure, contribute to the conservation of resources by promoting improvements to the efficiency of processing and making better use of the waste created within North London.
46. The introductory chapter to the Plan explains that a number of spatial principles have informed the detailed policies and the site/area selection for new waste management facilities. However, the introductory text provided in paragraph 1.3 of the Plan does not adequately explain how the strategic objectives of the Plan have informed the spatial principles. **MM1** is therefore necessary to explain how the spatial principles flow from the strategic objectives. This is necessary to ensure that the Plan is effective. This MM also proposes similar modifications to paragraph 4.1 of the Plan which will be discussed later in this report.
47. The 'Aim' of the Plan is identified in paragraph 3.3. This explains the aim of achieving net self-sufficiency for LACW, C&I, C&D, including hazardous waste streams and a need for an integrated approach to move the management of waste further up the waste hierarchy. However, the Aim does not adequately explain what is meant by net self-sufficiency in the context of the management of waste. In addition, it does not promote the beneficial use of excavation waste nor does it recognise that the waste facilities that are required during the Plan period are necessary to meet the identified needs for waste management. Consequently, the Aim of the Plan is not in accordance with Chapter 9 of the London Plan. **MM2** addresses this matter and is necessary to ensure general conformity with the London Plan and that the Plan is effective.
48. Paragraph 9.8.18 of the London Plan identifies that hazardous waste makes up a component of all waste streams and is included in the apportionments for household, commercial and industrial waste. The Plan also identifies that hazardous waste is a sub type of LACW, C&I, C&D waste streams. However, it also identifies hazardous waste as a

waste stream in its own right in the calculation of the capacity gap and the need for new hazardous waste facilities.

49. In this regard, the question arises whether there is a lack of clarity and consistency in the Plan regarding its approach to hazardous waste. Both the Plan and, to some extent, the London Plan recognise that hazardous waste can be a component of LACW, C&I and C&D waste streams. The Plan recognises that this component requires specialist management that is separate to the management of these waste streams.
50. The approach of the Plan is to therefore identify the capacity gap for the hazardous waste element of these waste streams and consider the need for new facilities to manage this as a waste stream in its own right. Whilst this can appear as being inconsistent, I am satisfied that the Plan adequately explains its approach to identifying the sources of hazardous waste, calculation of the capacity gap for the management of this as a waste stream, and the identification of new facilities needed, throughout the relevant sections of the Plan.
51. The Plan identifies eight strategic objectives that demonstrate how the Aim is to be met and identifies the relevant policies in the Plan through which each of the objectives will be delivered. The purpose of the strategic objectives is set out in paragraph 3.4 of the Plan. However, this does not adequately explain how these objectives are intended to deliver the Aim of the Plan or the relationship with policies that are identified. **MM3** addresses this matter and is necessary for the Plan to be effective.
52. Strategic Objective SO3 relates to the achievement of net self-sufficiency for LACW, C&I, C&D and hazardous waste streams. However, it does not identify the need for development to seek the beneficial use of excavation waste or that monitoring of waste exports is necessary to assess the effectiveness of the Plan in meeting this objective. In this context, SO3 is also partially inconsistent with the modifications made to the Plan as a consequence of **MM2**. In addition to the modifications identified above, **MM3** also addresses these matters and is necessary in order for the Plan to be effective.
53. Paragraph 2.27 of the Plan identifies how the respective strategies of each of the North London Boroughs are driven by the requirements to mitigate and adapt to the effects of climate change. Whilst this paragraph explains that the Plan aims to deliver effective waste management to combat climate change, it does not adequately explain how this is intended to be achieved. **MM4** proposes additional text to paragraph 2.27 to explain how the Plan seeks a reduction in disposal to landfill, lowering of emissions from road transport and direct new development to appropriate sites taking into account a greater occurrence of urban flood events. This MM is necessary to ensure that the Plan is positively prepared and is effective.

## Conclusion on Issue 1

54. Subject to the identified MMs, I am satisfied that the Aims and Strategic Objectives of the Plan are in general conformity with the London Plan, are appropriate and sound to provide a suitable basis for meeting the future waste management needs of North London sustainably.

## Issue 2 – Whether the Spatial Framework for waste management is appropriate, is fully justified by the evidence and is soundly based.

55. Section 4 of the Plan sets out the spatial framework, renamed as spatial principles, that have informed its approach to the management of waste over the Plan period and the proposed locations for new facilities. This culminates in the identification of six underpinning spatial principles (A to F) set out in paragraph 4.4. These seek to make better use of existing sites (A); seek a better geographical spread of waste sites across North London consistent with the principles of sustainable development (B); encourage co-location of facilities and complementary activities (C); provide opportunities for decentralised heat and energy networks (D); protect local amenity (E) and support sustainable modes of transport (F). Each of these spatial principles are further explained in Section 4.
56. Paragraph 4.2 provides part of the supporting text that identifies how the spatial principles flow from the Plan's Strategic Objectives. However, **MM5** is necessary to provide further clarity in paragraph 4.2 to explain that the spatial principles have taken into account the Plan's evidence base and the views of stakeholders. This is necessary for the Plan to be justified.
57. Paragraph 4.11 provides part of the explanatory text to Spatial Principle B. It identifies some of the factors that influence the location of new waste sites to achieve a better geographical spread of facilities in North London. However, it fails to recognise that part of the Plan area includes land allocated as Green Belt. **MM6** provides additional text to explain that most waste facilities would be regarded as inappropriate development in the Green Belt unless very special circumstances could be demonstrated. This MM is necessary in order for the Plan to be effective and consistent with national policy and the London Plan.
58. Although Spatial Principle B seeks a better geographical spread of waste sites across North London, the Plan does not adequately explain why the current location of facilities may not be of the right type and in the right place to meet waste management needs up to 2035. As such, there is insufficient justification to support the need for Spatial Principle B. **MM7** introduces a new paragraph describing the geographical spread of existing waste sites and referencing Figure 9, which has been revised and renumbered as Figure 5, showing the

location of existing waste sites in the Plan area. This demonstrates that there is a concentration of existing waste sites in the Lee Valley corridor and mainly in the London Borough of Enfield.

59. **MM7** further explains that Enfield currently contributes 62% of land currently in waste use in North London, compared to 18% in Barnet, 12% in Haringey and 5% or less in the remaining constituent Boroughs. This MM also assists in justifying the need to create a more sustainable pattern of waste development across North London and is necessary in order for the Plan to be effective and justified.
60. I recognise that the Plan could have adopted a more detailed analysis of waste arising to determine a more precise geographic location of new facilities needed by seeking to locate these in close proximity to the source. Instead, the approach adopted in the Plan predominantly relies on the use of administrative boundaries to help determine how a better geographical spread of sites across North London should be achieved. However, I consider the adopted approach to be sound, particularly given the strong competition for land in North Land and the difficulty this creates in defining precise locations, as will be explained later in this report.
61. Paragraph 4.12 also provides supporting text to Spatial Principle B. It identifies that Policy 2 (Priority Areas for new waste management facilities) of the Plan seeks to extend the existing spread of locations for waste facilities by identifying locations that are suitable for waste management use. However, it does not explain how the Plan intends to achieve a better geographical spread of waste facilities as set out in Spatial Principle B.
62. **MMS** proposes additional text to paragraph 4.12. This explains that Section 8 of the Plan sets out how 'Priority Areas' for new waste facilities in the Plan area have been identified. This includes limiting the number of Priority Areas in Enfield and introduces an area based approach that identifies certain industrial and employment areas as being the most suitable for waste management uses. It further explains that Policy 2 promotes an 'outside of Enfield first' approach in considering new proposals for waste management and identifies that the combination of existing waste sites and Priority Areas will provide a more sustainable and appropriately located network of waste facilities in the Plan area. This MM is necessary for the Plan to be effective.
63. Spatial Principle C seeks to encourage the co-location of facilities and complementary activities. This refers to the need to move towards a more 'circular economy' which is a European Commission (EU) initiative (Circular Economy Package) to which the Government has signed up to delivering the targets contained therein as part of the UK leaving the EU. In simple terms, a circular economy is an alternative to a traditional linear economy comprising make, use and dispose of goods to one in which they are retained in use for as long as possible, extracting the

maximum value from them while in use, then recover and regenerate products and materials from them at the end of their service life.

64. The supporting text to Spatial Principle C sets out the benefits of co-location of facilities but does not explain how the Plan will achieve this. **MM9** is therefore necessary for effectiveness and provides additional text after paragraph 4.17 of the Plan. This explains that Policy 2 provides a spatial focus towards the encouragement of co-located activities on land with similar existing uses.
65. In addition, this MM explains that Policy 3 (Windfall Sites) allows for opportunities of locating recycling facilities near to a reprocessing plant that could use the recycled material. It also explains that Policy 5 (Assessment Criteria for waste management facilities and related development) requires waste development proposals to consider the possible benefits of the co-location of activities.
66. Spatial Principle D identifies that the Plan will provide opportunities for decentralised heat and energy networks. **MM10** proposes additional text to supporting paragraph 4.18 of this spatial principle and identifies how policies in the London Plan (Policies SI 8 and SI 3 Part D1e) also encourage waste management proposals where they contribute towards renewable energy generation, low emission heat/cooling combined heat and power and heat networks. This MM is necessary for the Plan to be effective and in general conformity with the London Plan.
67. Spatial Principle E identifies that the Plan will support sustainable modes of transport. The supporting text to this spatial principle explains that road is the main mode of transport for waste but identifies that North London is well served by rail and waterway networks that could be used to transport waste. Whilst the supporting text identifies the opportunities and benefits of using more sustainable methods of transportation other than road, it does not adequately explain how the Plan will achieve this.
68. **MM11** therefore provides additional text to paragraph 4.26 of the Plan to explain that Policy 5 requires the consideration of sustainable transport modes in waste development proposals. It also explains that traffic movements can have an impact on amenity along the routes used and that Policy 5 also seeks to minimise such impacts where possible with reference to the use of low emission vehicles. This MM is necessary for the Plan to be effective.

## Conclusion on Issue 2

69. I am satisfied that the Spatial Framework for waste management contained within Section 4 of the Plan, when considered with the recommended MMs, is appropriate, is fully justified by the evidence and is sound.

**Issue 3 – Whether the Plan provides an appropriate and robust basis to identify the waste that needs to be managed in the Plan area and over the Plan period and is fully justified by the evidence.**

70. Section 5 of the Plan describes the current picture of waste management in the Plan area including the amount of waste generated, how and where it is currently managed. This section provides the baseline of how waste is currently managed in the Plan area. This is informed by the Waste Data Study, the last version prepared in 2019, which is produced in three parts and uses 2016 as a baseline year. Part One considers the 'North London Waste Arisings' (CD1/6); Part Two considers the 'North London Waste Capacity' (CD1/7); Part Three is the 'North London Sites Schedule' (CD1/8) which provides information on existing waste management facilities in each of the constituent North London Boroughs and includes the maximum capacity for each facility and the waste types that they can manage.
71. Section 2 of the National Planning Policy Framework for Waste (NPPW) requires, amongst other things, that Plans should be based on a proportionate evidence base using a robust analysis of best available data and information. The issue arises whether the way waste data presented in the Plan is sufficiently clear and in a logical order to enable a reader to adequately determine waste needs, capacity gaps and the justification for the approach to the retention of existing facilities and the identification of new facilities.
72. A 'Data Study Addendum' (CD1/23) was prepared in 2020 that proposed amendments to the way waste data is presented in the Plan. **MM12** provides additional text to paragraph 5.3 to explain that the Data Study Addendum has been used to improve the clarity of data presented in the Plan. This MM is necessary for the Plan to be justified and consistent with national policy.
73. The Plan identifies that currently 30% (845,776 tonnes) of the waste generated in the Plan area comprises LACW, 27% (762,301 tonnes) comprises C&I waste, 26% (747,242 tonnes) excavation waste, 15% (443,180 tonnes) C&D waste, 2% (53,420 tonnes) Hazardous Waste and less than 1% (9,223 tonnes) Agricultural Waste. The total amount of waste generated being 2,861,062 tonnes.
74. Not all of the above waste is managed within the Plan Area. **MM13** provides additional text to the pie chart in Figure 8, renumbered as Figure 9, that shows the percentage waste arisings and identifies that 66% of waste generated is managed within the Plan area. This MM also introduces a revised Table 4 which identifies the amount of waste managed within the Plan Area and elsewhere. This MM is necessary for the Plan to be justified.

75. **MM14** provides for revisions to Table 4 to more clearly show the amount of waste for each of the waste streams identified above that is managed in the Plan area, managed elsewhere in London, exported to landfill outside London and exported to other facilities outside London. This MM is necessary for the Plan to be justified.
76. In considering the cross boundary movements of waste, paragraph 8 of the Plan identifies that North London does not have all the types of facilities necessary to manage all of the identified sub types of waste. In particular, there are few specialist hazardous waste facilities and no landfill sites in the Plan area so waste that requires to be managed at these types of facilities will need to continue to be exported. However, the Plan also recognises that in order to achieve a net self-sufficiency in waste management capacity within the Plan area and move the treatment of waste up the waste hierarchy, exports of waste will need to be balanced out by an equivalent amount of additional capacity within the Plan area.
77. **MM15** provides for the existing paragraph 5.29 of the Plan to be brought forward to appear after paragraph 5.8. The current paragraph 5.29 identifies that in 2016 around 1 million tonnes of waste was imported into the Plan area for management within transfer stations, treatment facilities and metal recycling sites.
78. **MM15** also provides for revisions to the paragraph to explain that additional capacity that is necessary over the Plan period will be provided by existing facilities which already import waste from outside North London in line with market demands. The type of facilities that have catchment areas wider than the Plan area include metal recycling, end of life vehicle facilities and facilities for the processing of C&D and excavation waste into recycled aggregates. This MM is necessary for the Plan to be justified.
79. Paragraph 5.27 of the Plan considers waste that is exported from within the Plan area for disposal to landfill. **MM16** provides for revisions to the text in this paragraph that updates the amount of waste recorded as being exported from North London in 2016 to 1.4 million tonnes, 675,788 tonnes of which went to landfill. This MM also explains that most of the waste deposited to landfill was excavation waste (65%) followed by LACW/C&I (35%). The MM also identifies that the source data for hazardous waste exports to landfill is the 'Waste Data Interrogator' and the 'Hazardous Waste Data Interrogator'. This MM is necessary for the Plan to be justified.
80. **MM17** provides for three new paragraphs to provide additional text to explain the need and nature of cross-boundary movements of waste (imports and exports). These paragraphs further reinforce the fact the drive for net-sufficiency means that waste will still be imported and exported into North London. In addition, the MM refers to Table 6 of the Plan which, amongst other things, identifies the amount of waste which

is expected to be disposed to landfill over the Plan period. This MM is necessary for the Plan to be effective.

81. Paragraphs 5.31 and 5.32 of the Plan further consider the continued need for some waste to be deposited to landfill but recognises that there will be a scheduled closure of some of the currently available landfill sites during the Plan period. **MM18** provides for additional text and some deletions to the current text of paragraph 5.32 to explain that landfill capacity is declining across the wider south east and no non-hazardous landfill sites are likely to be brought forward by waste operators. Whilst some capacity will remain, associated with the restoration of mineral working sites, the MM reinforces the need for the Plan to manage waste further up the waste hierarchy to help reduce the need for landfill capacity. This MM is necessary for the Plan to be justified and effective.
82. Section 6 of the Plan identifies the future waste management requirements for each waste stream over the Plan period. Paragraph 6.3 and Table 5 of the Plan set out recycling and recovery targets up to 2030 from a 2016 baseline. However, these targets are not reflective of those provided in the recently adopted London Plan.
83. **MM19** therefore provides for the necessary revisions to the paragraph and table to provide consistency with the London Plan. These identify the aim of a 65% target of recycling of municipal waste from the LACW and C&I waste streams by 2030, 95% reuse/recycling/recovery of C&D waste by 2030, 95% beneficial use of excavation waste by 2030 and zero biodegradable or recyclable waste to landfill by 2026. This MM is necessary for the Plan to be consistent with the London Plan and effective.
84. Although the Plan explains that the UK has signed up to delivering the targets set out in the EU Circular Economy Package (CEP), the components of achieving a recycling target of 65% municipal waste by 2030 have been partially superseded by the London Environmental Strategy (LES) published in May 2018. This identifies that the 65% target will be achieved through a 50% recycling rate from LACW by 2025 and 75% from business waste by 2030 which are collective targets across the whole of London. The LES therefore goes further than the CEP by bringing forward London's LACW recycling target to 2025. **MM20** reflects the change in the recycling targets introduced as a consequence of the LES and is necessary for the Plan to be effective.
85. The question arises whether the Plan should be more explicit in identifying how the recycling targets should be met. However, the Plan is a land use planning document and one of its roles is to identify land suitable for waste management facilities. It is part of a range of strategy documents required to be prepared by a number of organisations across North London to demonstrate, in more detail, how the recycling targets are to be met. The Borough Councils, as waste

collection authorities, are required to prepare 'Reduction and Recycling Plans'. In addition, the North London Waste Authority (NLWA) has a responsibility to prepare a strategy on how the Mayor's recycling targets are to be met.

86. The level of detail provided in the Plan to demonstrate the land use planning approach to meeting the recycling targets is sound. More detailed waste management actions are provided in other documents and strategies.
87. Whilst the Plan identifies the London Plan target of 95% beneficial use of excavation waste by 2030, it does not explain what is meant by 'beneficial use'. **MM21** provides some examples that this could include using excavated material within a development, habitat creation, flood defence work or landfill restoration with a preference to using the material on-site or within local projects. This MM is necessary for the Plan to be effective.
88. Paragraph 6.4 explains that a range of options and alternatives were considered to model the predicted waste arisings in the Plan area over the Plan period. **MM22** proposes amendments and additions to this paragraph. These explain that the options considered leading to a preferred strategy included the effects of future activity, fiscal and legislative changes to landfill, financial incentives such as Renewable Obligations Certificates (ROCs) that increase the competitiveness of energy recovery, employment growth leading to an increase in C&I and CD&E waste streams and the proposed Energy Recovery Facility at Edmonton EcoPark from 2026.
89. **MM23** introduces a new Table which sets out the capacity options, growth options and management options for the LACW, C&I, C&D, Excavation, Hazardous and Agricultural waste streams. This takes into account various recycling, recovery, treatment and disposal scenarios and displays, in a summarised tabular form, some of the details provided in Part 2 of the Waste Data Study (CD1/7). This MM is necessary for the Plan to be justified and effective.
90. Amendments to paragraph 6.4 are provided by **MM24** and incorporate supporting text to the new Table provided by **MM23**. Amongst other things, these summarise that the preferred option is identified in Part 2 of the Waste Data Study and explains how a management option of net self-sufficiency was chosen based on growth of 0.81% over the Plan period. This preferred option is based on evidence provided by the Greater London Authority (GLA) and maximisation of recycling to move the management of waste further up the waste hierarchy. This MM is necessary for the Plan to be justified and effective.
91. Paragraph 6.5 of the Plan provides a simple formula that demonstrates the chosen approach to identify the projected waste arisings over the Plan period following the option appraisal as set out in Part 2 of the

Waste Data Study. This takes into account population/economic growth, maximisation of recycling, net self sufficiency for LACW, C&I, and C&D waste by 2026 to give the quantity of waste to be managed for each waste stream to 2035. The actual quantities are identified in five yearly intervals from 2020 in Table 8 (to be renumbered as Table 5) which will be discussed later in this report.

92. **MM25** provides new paragraphs to explain and support Table 8 and is necessary for the Plan to be effective. It sets out that whilst some of North London's Waste will still be exported to landfill, the aim of the Plan is to deliver the equivalent capacity for LACW, C&I, C&D and hazardous waste within the Plan area with recovery and recycling playing the most substantial part.
93. **MM26** provides for revisions to Table 8 and identifies the amount of waste that needs to be managed over the Plan period for LACW, C&I, C&D, Excavation, Hazardous and Agricultural waste streams. It identifies the total waste arisings for each waste stream and the amount that will be required to be recycled, recovered (Energy from Waste), treatment and disposal to landfill in five yearly tranches from 2020 to 2035. The revisions to the table as a consequence of **MM26** are necessary for the Plan to be effective and consistent with national policy as they clearly identify the amounts of waste in each stream that the Plan needs to cater for over the Plan period and the necessary waste management method.
94. Revisions to paragraph 5.5 of the Plan, which will be moved to appear after Table 8, provide introductory text to the existing capacity of North London's waste management facilities by type of facility and waste stream managed as at 2016. These are provided by **MM27** which is necessary for the Plan to be justified. The MM identifies a capacity of just over one million tonnes per annum of recycling/composting for LACW and C&I waste, just under 600,000 tonnes per annum of energy recovery for LACW, around 630,000 tonnes per annum of recycling and treatment for CD&E waste, and around 4,250 tonnes per annum of hazardous waste capacity.
95. **MM28** provides for revisions to existing Table 3 of the Plan (to be renumbered Table 6) that shows the detailed figures, in tonnes per annum, of capacity for each waste stream and the type of facility that this capacity relates to. This MM is necessary for the Plan to be effective.
96. The London Plan defines the technologies and processes which constitute 'managing' waste. **MM29** introduces new text to existing paragraph 5.6, which will be moved after the new Table 6, which identifies that these definitions have been applied to North London's facilities when calculating capacity. It identifies that transfer stations are not included except where they undertake recycling and this element only has been added to the total capacity identified in the

revised Table 3. This MM is necessary for the Plan to be justified and effective.

97. There are some known changes that will occur to some facilities over the Plan period that will affect their waste management capacity. However, these are not clearly identified in the Plan. **MM30** provides for a new section ('Changes to Capacity over the Plan Period') and an introductory paragraph to explain that some facilities are known to be moving or closing and some new facilities are proposed to be built. This MM is necessary for the Plan to be justified.
98. Additional planned capacity will be provided at the Edmonton EcoPark for which a Development Consent Order (DCO) has been approved by the Secretary of State for a new Energy Recovery Facility (ERF) that will manage the treatment of residual waste during the Plan period and beyond. Whilst this is referred to in paragraphs 8.5 and 8.6 of the Plan, these paragraphs do not adequately identify the capacity that will be provided, or lost, by the additional new facility.
99. **MM31** and **MM32** therefore provide revisions to paragraphs 8.5 and 8.6 and are necessary for the Plan to be justified. **MM31** identifies that the current facility provides for just under 600,000 tonnes per annum capacity and that the new facility will increase this to approximately 700,000 tonnes per annum. The additional 100,000 tonnes per annum has been incorporated into the calculation of the 'capacity gap' which will be considered later in this report.
100. Paragraph 8.6 of the Plan identifies that the DCO for the Edmonton EcoPark provides for the loss of the existing composting plant to make way for the additional ERF facility. **MM32** proposes additional text to this paragraph that states that it is not intended to build a replacement composting facility and that this will result in a capacity loss of around 35,200 tonnes per annum which has been built into the capacity gap calculation. Whilst this represents a loss of a facility, compensatory provision is not required as the wider Edmonton EcoPark is not being developed for non-waste management uses and therefore there is no conflict with Policy 1 of the Plan.
101. The Plan also refers to the Powerday facility in Enfield which is an existing site currently operating as a Waste Transfer Station. Planning permission has been granted for this site to be used as a Materials Recovery Facility capable of handling 300,000 tonnes of C&I and C&D waste per annum. **MM33** proposes additional text to paragraph 8.10 of the Plan that identifies that it is not clear if the planning permission will be implemented and therefore this has not been added to the pipeline capacity figures in identifying the capacity gap. This MM is necessary for the Plan to be justified.
102. Paragraphs 8.11 and 8.12 of the Plan relate to the loss and re-provision of existing waste management facilities. These identify the London Plan

requirement for compensatory capacity to be provided where existing waste management sites need to be redeveloped by non-waste management related uses.

103. It is known that some sites within the Plan area are to be subject to redevelopment but the Plan is not clear or specific regarding which facilities these may be or the effect this may have on future capacity. **MM34** provides for revisions to paragraph 8.11 that identifies that some sites will be redeveloped for other non-waste management uses as part of the Brent Cross Cricklewood Regeneration Scheme and the detailed information on this is set out in Schedule 1 of the Plan. This MM is necessary for the Plan to be justified.
104. **MM35** provides for revisions to paragraph 8.12 that identifies that the regeneration area includes four existing waste management sites. These are Site Reference BAR3 – PB Donoghue, BAR4 – Hendon Transfer Rail Station, BAR6 - McGovern and BAR7 – Cripps Skips. The MM identifies that the Hendon Rail Transfer Station will be replaced by a new facility and that planning permission has been granted for a new waste transfer facility at Geron Way.
105. The conflict between some of the above existing waste sites and the effect the use has on the living conditions of nearby residents is recognised but is not a matter that can be addressed in the Plan. However, **MM35** identifies that the existing facilities at BAR6 and BAR7 fall within the area of land required to deliver the early phase of the regeneration scheme for which work has commenced. BAR3 is identified as for closure as part of phase 4. The capacity at sites BAR4, BAR6 and BAR7 and part of the capacity of BAR3 would be replaced by the new waste transfer facility.
106. **MM35** also identifies that the remaining capacity from site BAR3 will need to be identified prior to its redevelopment. As such, the Plan assumes that there will be no loss of capacity as a consequence of the redevelopment of these facilities.
107. A new paragraph is proposed by **MM36** which identifies that two facilities in Waltham Forest have recently closed and their capacity has been replaced by a new facility in Enfield. Consequently, there has been no loss of capacity within the Plan area as a consequence of the site closure. **MM35** and **MM36** are necessary for the Plan to be justified.
108. Part 2 of the Waste Data Study (CD1/7), updated by the Data Study Addendum (CD1/23), provide the evidence base that supports the calculation of the 'capacity gap' for the LACW/C&I, C&D and Hazardous waste streams. The capacity gap for these waste streams is introduced in paragraph 6.7 of the Plan. However, this paragraph does not explain how the capacity gap has been calculated.

109. Whilst the Plan refers to the 'capacity gap', it does not adequately explain what this term means. **MM37** provides amendments to paragraph 6.7 to explain that the capacity gap is the difference between the projected waste arisings and the existing capacity taking into account known changes to capacity over the Plan period. This MM also sets out that additional waste management capacity required will be for recycling and recovery in accordance with Strategic Objective 1 of the Plan. This MM is necessary for the Plan to be justified.
110. **MM38** provides for revisions to Table 6 of the Plan (to be renumbered as Table 7) that reflect the evidence in the Data Study Addendum and numerically sets out the capacity gap for the waste streams above in tonnes over five yearly intervals from 2020 to 2035. This table demonstrates that without additional sites or the expansion of existing facilities there will be a capacity gap for LACW/C&I and Hazardous waste streams throughout the Plan period. It also demonstrates that there will be a surplus in capacity for the management of C&D waste throughout the Plan period.
111. A new paragraph is provided by **MM39** which explains that to meet the identified capacity gaps identified in the Table, the approach will be to seek opportunities for new capacity through the intensification of existing sites and/or new facilities. **MM37**, **MM38** and **MM39** are necessary for the Plan to be effective.
112. In order to determine how much land is needed to be identified for waste management facilities to meet the capacity gap, paragraph 6.8 of the Plan sets out that the capacity gap has been converted into a land area requirement based on a typical throughput per hectare for various types of facilities. However, this paragraph does not adequately explain the evidence base which has been used to enable the land area required to be calculated.
113. **MM40** provides amendments to paragraph 6.8 to explain that Table 20 in section 7 of the Waste Data Study Part 2 (CD1/7) provides the evidence base that supports the calculation of the land required. This MM also explains that new technologies may be introduced during the Plan period that may enable some sites to have a higher throughput per hectare. Consequently, monitoring of site capacity, which will be discussed later in this report, will enable the land required to be reviewed. In addition, the MM also sets out that in order for net self-sufficiency to be achieved by 2026, in line with the London Plan, new capacity will need to be delivered by this date.
114. A new table showing the assumed tonnages per hectare that have been used to calculate the land take requirements for various recycling, energy from waste, re-use and composting facilities is provided by **MM41**. Revisions to Table 7 of the Plan (to be renumbered as Table 9) and the supporting text are provided by **MM42** and **MM43** respectively. These identify the indicative land take requirements to meet the

identified capacity gap and that by 2026 an additional 1.5 hectares of land for the recycling of LACW/C&I waste and 4.9 hectares of land required for recycling/recovery/treatment of Hazardous waste will be required in the Plan area. Therefore, a total of 6.4 hectares of land for waste management uses will be required in the Plan area. These MMs (**MM40** to **MM43** inclusive) are necessary for the Plan to be effective.

### **Conclusion on Issue 3**

115. I am satisfied that the Plan, when considered with the recommended MMs, provides an appropriate and robust basis to identify the waste that needs to be managed in the Plan area and over the Plan period and is fully justified by the evidence and is sound.

### **Issue 4 – Whether the selection process to identify areas to manage the identified waste needs over the Plan period is clear, robust and justified.**

116. Sections 3 to 6 of the NPPW set out the approach that Local Plans should take to identify future waste requirements over the Plan period. Paragraph 4 of the NPPW sets out criteria for identifying suitable sites and areas for waste management facilities. They include the consideration of a broad range of locations including industrial sites, opportunities to co-locate waste management facilities and giving priority to re-using previously developed land and sites identified for employment purposes.
117. The London Plan (Policy SI 8) requires Development Plans to plan for identified waste needs and “allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide capacity to manage the apportioned tonnages of waste”. The London Plan also identifies existing waste sites, Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS) as a focus for new waste capacity.
118. The current Section 8 of the Plan (which will be swapped to precede Section 7) sets out the approach taken to identify sites/areas needed to meet the waste needs and capacity gap. It refers to the methodology assessment criteria that has been used in the Sites and Areas Report (CD1/9) to inform the identification of individual sites/areas that are suitable for future waste management use.
119. The introductory paragraphs to Section 8 do not adequately describe the policy context briefly described above that is provided in the NPPW and the London Plan that has influenced the approach to the identification of suitable sites and areas for waste management facilities. It is also not clear how the requirements of Strategic Objective 2 of the Plan, which requires that sufficient land is available to meet North London’s waste management needs, is to be delivered.

**MM44** provides additional text to explain these matters and is necessary for the Plan to be effective.

120. During the 'call for sites' exercise only one site was put forward by landowners as being possibly suitable for waste management uses. As a result, the Plan proposes an 'area' approach to the identification of potential locations for waste management uses. Whilst the Plan refers to new future areas for waste management it does not adequately explain these. **MM45** provides amendments to paragraph 8.2 of the Plan. This explains that an 'area' comprises a number of individual plots of land, such as an industrial estate or employment area that is in principle suitable for waste use but where land is not specifically safeguarded for such use. This MM is necessary for the Plan to be effective.
121. Although Policy SI 8 of the London Plan identifies that SIL/LSIS are suitable locations for waste management, the assessment criteria adopted in the Plan has sought to refine this approach in the Sites and Areas Report by the application of an assessment methodology to locational areas that are the most suitable for waste management use in the Plan area. These are identified as 'Priority Areas'. However, paragraph 8.2, which introduces the area search criteria, does not provide any explanation of what is meant by a 'Priority Area'. **MM46** addresses this matter and is necessary for effectiveness.
122. The Sites and Areas Report (CD1/9) identifies areas potentially suitable for waste management use. The methodology for identifying new areas is broadly supported by technical consultees and the waste management industry. However, the Sites and Areas Report does not adequately identify how the best performing areas and existing industrial areas should be identified as the focus for new waste facilities or how a wider geographical distribution of facilities should be sought.
123. The Draft Plan initially identified that approximately 352 hectares of land within the Plan area was suitable for waste management uses. An 'Options Appraisal for Sites and Areas' informed the identification of the most appropriate sites and areas shown in the Publication Plan. This resulted in a reduction in the area of land within the Plan area that could be potentially suitable for waste management uses to approximately 102 hectares. However, despite this latter figure being used in the Plan, the 'Options Appraisal for Sites and Areas' document was not published nor are its outputs adequately reflected in the Plan. Consequently, the issue arises whether the Plan provides a robust rationale that clearly demonstrates why 102 hectares of land is identified as being deemed suitable for waste management uses compared with an identified need of just 6.4 hectares.
124. The 'Options Appraisal for Sites and Areas' was updated in 2020 (CD1/24). **MM47** explains that this has been used to inform the areas

that have been identified in the Plan as being suitable for waste management uses. This MM is necessary for the Plan to be justified.

125. Table 10 of the Plan identifies the assessment criteria that was used in the Sites and Areas Report to identify areas potentially suitable for waste management use. However, this is based predominantly on the 2015 version of the Sites and Areas Report and does not identify the further refinement that was applied through the 2019 version and by the Options Appraisal for Sites and Areas. **MM48** provides amendments to paragraph 8.24 of the Plan to explain that further work was undertaken, including re-appraisal of areas, impacts and the geographical location of sites.
126. I have carefully considered the concerns that this later re-appraisal work should be discounted as it was not wholly available at the submission stage. Nonetheless, the additional work and re-appraisal exercise that was undertaken after the examination hearings was in response to matters raised in those hearings and was made publicly available. It reflects the outputs from the Data Study Addendum and informs the relevant subsequent MMs. There is nothing unusual in this approach or the sequence of events. Overall, I find that the methodology used to evaluate the areas is sound.
127. Additional new paragraphs and amendments to paragraph 8.25 are provided by **MM49**, **MM50** and **MM51**. These further explain the assessment criteria and that the Options Appraisal for Sites and Areas considered five different options to evaluate the location and area of land required for waste management uses in the Plan area over the Plan period. The options include and exclude areas based on their performance against qualitative assessment criteria, detailed in the Sites and Areas Report.
128. The preferred option used in the Plan is Option 5. This identifies that areas with 'Band B' sites (Site is suitable for waste uses following appropriate mitigation), SIL and LSIS areas with a cap on land in Enfield. This option identifies only one industrial area in Enfield as being suitable for waste management uses and provides a more appropriate geographical spread of sites across the Plan area.
129. Overall, I find that the methodology used to identify the preferred option and the approach taken to evaluate the most appropriate locations for waste management development to be sound. However, none of the options considered resulted in a reduction of the total land area required in the Plan for potential waste management uses to be less than the 102 hectares identified.
130. The justification for such a large area being identified in the Plan, against an identified requirement of just 6.4, is also provided by **MM51**. This explains the strong competition for the use of any vacant industrial land in North London which already has low vacancy rates

- (4.8%) and that the Sites and Areas Report analyses churn and vacancy rates in detail. Taking into account this analysis, the Plan identifies that 20% (20.5ha) of the allocated land could become available over the Plan period as a result of business churn.
131. Given the competition for industrial land in the London market, the absence of sites coming forward in the call for sites exercise, the low vacancy rates and the identified rate of churn, the approach adopted in the Plan to identify more land than is required to meet the waste needs of North London over the Plan period is justified. I find that this aspect of the Plan's approach provides flexibility over the Plan period and recognises the competitive nature of land use economics in North London. Identifying a range of land suitable for new waste facilities is a reasonable way of creating "sufficient opportunities to meet the identified needs of their area" as required by the NPPW.
  132. **MM51** also recognises that there is a risk that the identified area in Enfield, comprising 26ha, could accommodate all new waste capacity that is required over the Plan period. Furthermore, the possibility that planning applications for new waste management facilities on other industrial land in Enfield, cannot be ruled out. Both of these scenarios would be contrary to Spatial Principle B of the Plan.
  133. In response to the above, **MM51** explains that the Plan promotes a 'Priority Areas' sequential approach to ensure that waste management proposals demonstrate that consideration has been given to siting a facility within the areas set out in Schedules 2 and 3 of the Plan before other locations. This approach is set out in Policies 2 and 3 of the Plan, which are considered later in this report, and which also require that Priority Areas outside of Enfield should be considered first before a new waste site in Enfield is proposed.
  134. These MMs (**MM48** to **MM51** inclusive) are necessary for the Plan to be justified and effective.
  135. The Plan identifies thirteen Priority Areas to provide land suitable for the development of waste management facilities. Each Priority Area comprises an industrial estate or employment area that is in principle suitable for waste uses, subject to detailed assessment at the planning application stage.
  136. Area profiles for each of the Priority Areas are provided in Appendix 2 of the Plan. These provide an indication of the types of facilities likely to be acceptable and could be accommodated on the Priority Area, identify planning and land use constraints and any mitigation measures that may be required.
  137. Paragraph 8.26 identifies that the Priority Areas identified in Schedules 2 and 3 of the Plan are those which meet the selection criteria, as discussed above, and comply with the spatial principles of the Plan.

**MM52** provides additional text to paragraph 8.26 to explain that in order to ensure that Priority Areas are the focus of new waste capacity, the location of new facilities will be monitored through Monitoring Indicator IN3. **MM53** provides for an updated Figure 13, to be renumbered Figure 11, that comprises a plan showing the locations of the Priority Areas for new waste management facilities. These MMs are necessary for the Plan to be effective.

138. The question arises whether the allocated area A22-HR (Friern Barnet Sewage Works/Pinkham Way) should be deleted as a Priority Area. I have carefully considered the written and oral evidence provided regarding this proposed allocation.
139. Priority Area A22-HR has a dual designation as Site of Importance for Nature Conservation (SINC) and Local Employment Area (LEA) in the Haringey Local Plan Strategic Policies (2013) and is protected for employment use, subject to consistency with its nature conservation status. Where a site has more than one designation, the Local Plan Strategic Policies document identifies that appropriate mitigation measures must be taken and where practicable and reasonable, additional nature conservation space must be provided.
140. Notwithstanding the evidence provided with regard to previous local plan examinations in Haringey, the dual designation of Priority Area A22-HR is a matter of fact and it is not the purpose of the North London Waste Plan Examination to determine if both, or either, of these designations should continue to apply. The consideration is whether the evidence justifies, or otherwise, its identification as a Priority Area in the Plan and that the Plan is sound in this regard.
141. Appendix 2 of the Plan, which is considered later in this report, clearly identifies the planning constraints applicable to the area and sets out the need for ecological/nature conservation mitigation and enhancement to be considered as part of any development proposals.
142. The question also arises whether the evidence has appropriately considered the flood risk issues that are relevant to the site. In this regard, I have carefully considered the Flood Risk Sequential Test and Report (CD1/11 and CD1/19), the Flood Risk Addendum (CD1/11/Add) and the Sustainability Appraisal Addendum and update (CD1/2/Add and CD1/2/Add-MM). Taking into account **MM113**, which is considered later in this report, I am satisfied that these documents collectively provide sufficient evidence to confirm that the Plan's approach to the consideration of flood risk in respect of site A22-HR is sound. I am also satisfied that appropriate engagement has taken place with the Environment Agency to inform the flood risk evidence.
143. The above documents indicate that of the 5.95ha comprising the Priority Area (which includes land owned by both the North London Waste Authority and Barnet Council), approximately 76.3% is shown to

be within Flood Zone 1, approximately 11.6% within Flood Zone 2 and approximately 12.1% within Flood Zone 3a. The eventual, if any, location of new waste development would be assessed against the flood risk criteria of the NPPF with the objective of avoiding development on land that is at risk of flooding by directing development away from areas of high risk (whether existing or future). In this regard a site-specific flood risk assessment would be required for any waste management development on this area.

144. Notwithstanding the former land uses on the area, a considerable part has revegetated over time. The question arises whether Priority Area A22-HR should be identified as previously developed land or whether it has revegetated to the extent that the remains of the former activities and structures have blended into the landscape to become part of the natural surroundings. Whilst the Plan recognises the current revegetated condition of the site it understandably does not provide any conclusion on the extent to which it may, or may not, have blended into the landscape, or indeed will do so overtime.
145. It is not necessary for Priority Areas to comprise previously developed land. Consequently, I do not consider it necessary for the purposes of soundness to firmly conclude the extent to which the site may or may not be considered as previously developed land. However, this is a matter that may be relevant in the consideration of any subsequent planning application for future waste management development.
146. Overall, I am satisfied that the site selection process is sound with regard to the identification of Priority Areas and that the relevant constraints for the areas identified have been appropriately considered and taken into account.

#### **Conclusion on issue 4**

147. I am satisfied that the Plan demonstrates, when considered with the recommended MMs, that the selection process to identify areas to manage the identified waste needs over the Plan period is clear, robust and justified by the evidence and is sound in this respect.

#### **Issue 5 – Whether the Plan makes appropriate provision for the future management of waste.**

148. Section 6 of the Plan sets out the future waste management requirements and Section 8 (to be moved and renumbered Section 7) sets out the selection process to identify Priority Areas required to manage the identified waste needs over the Plan period. The current Section 7 of the Plan (to be moved and renumbered Section 8) brings this information together to explain how North London's waste needs are intended to be managed over the Plan period. It identifies the waste management processes to be used for each waste stream.

149. This Section sets out an 'Over-arching Policy for North London's Waste' which reflects the achievement of net self-sufficiency for LACW, C&I, C&D and Hazardous waste streams by 2026. It sets out the need for excavation waste to be put to beneficial use and the encouragement of development on existing sites and in Priority Areas that promote the management of waste up the hierarchy, reflect the proximity principle by increasing the management of waste as close to the source as practicable and reducing exports to landfill.
150. Paragraph 7.2 provides supporting text to the over-arching policy. **MM54** provides additional text to this paragraph to explain that most capacity will be met through existing facilities and that Policy 1 of the Plan supports the intensification of existing sites whilst also enabling relocation to more sustainable locations for replacement capacity subject to assessment as required by Policy 5.
151. Paragraph 7.4 refers to the monitoring of the projected quantities of waste to ensure that the over-arching policy is being delivered. **MM55** provides additional text to explain there are four particular monitoring indicators in the Plan to assess this. These are outlined as being IN1 which monitors waste arising compared with the projected quantities; IN2 which monitors new waste management capacity delivered; IN3 monitors the location of new waste facilities and compensatory provision; IN7 monitors the amount of waste exported from the Plan area.
152. These MMs provide amendments to the supporting text of the over-arching policy and are necessary to ensure that the Plan is effective.

#### LACW and C&I waste

153. Paragraph 7.8 introduces the Plan's approach to the management of LACW and C&I waste. **MM56** provides amendments to this paragraph to explain that these waste streams comprise similar types of waste and that most of the facilities that manage these waste streams do not differentiate between these waste types. Consequently, the Plan groups the management of these waste streams together when assessing existing capacity and planning for additional capacity.
154. **MM57** provides new text to explain that there is a capacity gap of approximately 174,500 tonnes for LACW and C&I waste over the Plan period which equates to a requirement for 1.5 hectares of land, subject to the technology that facilities may use in the future. **MM56** and **MM57** are necessary for the Plan to be justified.
155. The Plan sets out the approach to the recycling/composting of LACW and C&I waste in paragraphs 7.9 to 7.11. **MM58**, **MM59** and **MM60** provide amendments and new text to these paragraphs. These amendments explain the role of the NLWA in preparing a Joint Waste Strategy (JWS). A key element of the most recent JWS, which expired

in December 2020, has been met through the granting of consent under the Development Consent Order (DCO) process for a replacement energy recovery facility at the Edmonton EcoPark to treat residual waste. The new JWS will be developed in 2021/22 and will set out how North London will contribute to the Mayor's recycling targets.

156. The new text in **MM60** explains that there is an opportunity to bring forward new waste recycling/composting capacity on the part of site A22-HR (Friern Barnet / Pinkham Way site) which is owned by the NLWA. There is also opportunity to bring forward commercial recycling in all but one of the Priority Areas identified in Schedule 2 and 3 of the Plan and composting capacity on four of the Priority Areas. **MM58, MM59, MM60** and **MM61** are necessary for the Plan to be effective.
157. Paragraph 7.14 is one of a number of paragraphs that explains the Plan's approach to the recovery of LACW and C&I waste. Amendments to this paragraph and the inclusion of a new paragraph are provided by **MM61** and **MM62**. The amendment to paragraph 7.14 deletes reference to additional land being required for the recovery of C&I waste as after 2025 the recovery element of this waste stream can be met by the new Edmonton Energy Recovery Facility. However, notwithstanding this, the new paragraph explains that there are opportunities for additional recovery capacity to be brought forward on three of the proposed Priority Areas. **MM61** and **MM62** are necessary for the Plan to be justified and effective.

#### CD&E waste

158. The approach to the recycling of CD&E waste is set out in paragraphs 7.19 and 7.20. **MM63** and **MM64** are necessary for the Plan to be justified and provide amendments to these paragraphs. These explain that North London has sufficient capacity over the Plan period to manage construction and demolition waste but some exports of excavation waste will continue. Monitoring Indicator IN1 will provide the annual monitoring of recycling rates for these waste streams.
159. Paragraph 7.23 explains that the Plan depends on landfill capacity being available outside of the Plan area over the Plan period. However, **MM65** is necessary for the Plan to be justified and provides amended text to explain that the majority of C&D waste (95%) will be reused, recycled and recovered and that the majority of excavation waste (95%) will be put to beneficial use.

#### Hazardous Waste

160. Paragraphs 7.26 and 7.27 set the Plan's approach to the recycling and recovery of hazardous waste. **MM66** and **MM67** provide amendments to these paragraphs to reflect the fact that there are a number of facilities in the Plan area that manage this waste with the majority being car breakers and metal recovery facilities. However, the capacity

for the management of hazardous waste is 49,000 tonnes per annum which requires approximately 4.9 hectares of land. New facilities, in principle, are supported in the Priority Areas. The Area Profiles in Appendix 2 of the Plan identify where a Priority Area is not suitable for hazardous waste and recycling and recovery activities. These MMs are necessary for the Plan to be justified and effective.

### **Conclusion on Issue 5**

161. I am satisfied that the Plan demonstrates, when considered with the recommended MMs, that appropriate provision is made for the future management of waste in the Plan area over the Plan period and that it is sound in this respect.

### **Issue 6 - Whether the Plan's policies make appropriate provision for waste management development over the Plan period and provide an adequate balanced approach to protect people and the environment whilst delivering the Plan's aims and strategic objectives.**

162. Section 9 sets out the Plan's policies to deliver the aims and strategic objectives, spatial principles and the overarching policy for waste management in the Plan area.

### **Policy 1: Existing Waste Management Sites**

163. The existing waste management sites by site name are identified in Schedule 1 of the Plan. Policy 1 seeks to safeguard these, and any other sites that are granted planning permission, for waste uses. The policy supports the expansion or intensification of operations on existing waste sites. The policy sets out that non-waste uses on these safeguarded sites will only be permitted where it is clearly demonstrated that compensatory capacity can be provided. However, it does not identify how this is to be achieved or that such compensatory provision should also accord with the spatial principles of the Plan.
164. Whilst Schedule 1 identifies the site name of existing sites it provides no information on the site address, details of the waste streams that are managed or information on the annual tonnage of waste managed by the individual sites shown in the schedule. **MM105a** provides for this additional information to be provided in Schedule 1 and is necessary for the Plan to be justified.
165. **MM105b** provides for a change to the site area identified to be safeguarded on the Haringey Policies Map for site HAR 7 of Schedule 1. This corrects a mapping error and is necessary for the Plan to be effective.
166. The policy also refers to the 'agent of change principle' in respect of new non-waste development that may prejudice the use of a waste

site. It applies this principle to the Priority Areas allocated for waste management, as well as existing sites. The effect of applying this principle to allocated areas could significantly prejudice the delivery of non-waste management development on sites in proximity to the 109 hectares of land identified as Priority Areas, particularly as less than 10% of this area is likely to be developed for waste management uses. **MM68** addresses these matters and is necessary for the Plan to be effective. Amongst other things, the MM makes it clear that consideration of the agent of change principle only applies to existing sites.

167. Paragraphs 9.4 to 9.10 provide the supporting text to Policy 1. However, these paragraphs do not adequately explain that safeguarding of an existing waste site for waste use does not preclude changes of ownership or that planning applications for the intensification or expansion of operations will be permitted providing they align with other policies in the development plan.
168. In addition, the supporting text does not adequately explain that compensatory capacity must be above or at the same level of the waste hierarchy and at least meet the maximum achievable throughput of the existing site by reference to the throughput achieved over the last five years. Also, the text does not adequately explain that compensatory provision should also accord with the Plan's spatial principles and should be provided within the Plan area, unless the Plan's Annual Monitoring Report clearly demonstrates that remaining capacity is sufficient to meet net self-sufficiency for LACW, C&I, C&D and hazardous wastes. **MM69, MM70, MM71, MM72** and **MM73** address these matters and are necessary for the Plan to be effective.
169. Paragraph 9.10 provides further supporting text to explain the agent of change principle. However, it does not adequately explain the responsibilities placed on new development with regard to the mitigation of the impacts that may arise from locating new development in the proximity of an existing waste site. **MM74** addresses this matter and is necessary for the Plan to be effective.
170. In considering the impacts from waste management activities, the Plan does not explain the relationship between the planning policy considerations of the Plan and the Environmental Permitting Regulations. **MM75** addresses this matter in the interests of effectiveness and provides additional supporting text to Policy 1.

## **Policy 2: Priority Areas for new waste management facilities**

171. This policy sets out the Plan's support for new waste management facilities but refers to these as being locations as opposed to 'Priority Areas'. The policy does not adequately reflect Spatial Principle B which seeks a better geographical location of sites. In addition, for consistency and effectiveness, it should reflect the modifications

provided by **MM8** requiring that new sites should be in Priority Areas outside of Enfield and that development proposals will need to demonstrate that no other sites are available before considering sites within Enfield's Priority Area. Furthermore, the Policy does not provide support for the co-location of complementary activities as required by spatial principle C. **MM76** addresses these matters and is necessary for the Plan to be positively prepared and effective.

172. Tables 11 and 12 identify the Schedule 2 and Schedule 3 areas respectively to which Policy 2 relates. Schedule 3 areas are those located within the LLDC area which are to be identified in the LLDC Local Plan and for which LLDC will be the relevant waste planning authority for the determination of planning applications on those areas. However, Tables 11 and 12 do not refer to the areas identified as being 'Priority Areas' to which the modified Policy 2 relates. **MM77** addresses this matter and is necessary for the Plan to be effective.
173. Paragraph 9.11 of the Plan provides part of the supporting text to Policy 2. However, it does not adequately explain how the Priority Areas identified meet the Strategic Objectives and Spatial Principles of the Plan. In addition, the text does not explain that the sequential Priority Area approach applies to additional capacity in Enfield only and not to the expansion or intensification of existing waste sites or providing compensatory capacity for sites already in the Borough. Furthermore, it does not explain that there is an exception to the sequential Priority Area approach in Enfield where proposals are for Recycling and Reuse Centres (RRCs) as there is an identified need in Enfield and Barnet to improve coverage across North London. **MM78** addresses these matters and is necessary for the Plan to be effective.
174. Paragraphs 9.13 to 9.16 also provide supporting text to Policy 2. However, these do not adequately explain that the Priority Areas will be identified as the most suitable locations for waste uses in the relevant Borough Council Policies Maps. In addition, this supporting text does not explain how the Priority Areas identified meet Strategic Objectives 1 and 5 and that for each area there is an 'Area Profile' in Appendix 2 of the Plan which indicates the constraints that may be applicable in considering development proposals within such areas. Furthermore, the text does not explain that the Priority Areas are also suitable to consider for compensatory capacity. **MM79, MM80, MM81** and **MM82** provide the necessary modifications in order for the Plan to be effective.

### **Policy 3: Windfall Sites**

175. This policy provides support for waste management development on windfall sites. However, it does not adequately explain that the policy relates to development proposals on sites that are located outside of the existing sites, identified in Schedule 1, or outside of Priority Areas as identified in Schedules 2 and 3. Furthermore, it does not adequately

reflect Spatial Principle B and fails to identify that sites outside of Enfield should be considered first. **MM83** addresses these matters and is necessary for the Plan to be effective.

176. Corresponding changes to the supporting text of Policy 2 in paragraphs 9.23 and 9.24 are necessary to reflect the changes made to the policy but to also explain that the exception to this is for development proposals for RRCs in Enfield and Barnet. This is necessary improve the geographical coverage of RRCs across North London. These are provided by **MM84** and **MM85** which are necessary for the Plan to be effective.

#### **Policy 4: Re-use & Recycling Centres (RRCs)**

177. This policy provides support for RRCs across the Plan area but does not identify the fact that these are particularly needed in Enfield and Barnet in order to improve the coverage across the Plan area. **MM86** provides the modification to address this matter and is necessary for the Plan to be effective.
178. Paragraph 9.33 provides part of the supporting text to Policy 4 and identifies that existing Sites and the Priority Areas identified in Schedules 1, 2 and 3 are likely to be the most suitable for RRCs. However, the paragraph does not explain the relationship with Policy 3 and how this policy will apply to a proposal for a RRC outside of these areas. **MM87** provides the text to address this matter and is necessary for the Plan to be effective.

#### **Policy 5: Assessment Criteria for waste management facilities and related development**

179. This policy sets out the environmental and amenity matters that will need to be addressed in the submission of planning applications for waste management development. However, the policy fails to recognise the need for the efficient use of urban land in North London and as such does not identify that proposals should maximise the waste capacity of the site. In addition, the policy is unduly restrictive in requiring all facilities to be enclosed which is unnecessary if an equivalent level of amenity or environmental protection can be permanently achieved by other means.
180. The protection afforded to heritage assets in the policy by seeking to avoid significant adverse impact is inconsistent with the advice provided in Section 16 of the Framework. Furthermore, the policy does not require any consideration of the effect of development proposals on the mitigation or adaption to climate change. **MM88** addresses these matters and is necessary for the Plan to be effective and consistent with national policy.

181. Part of the supporting text to the policy is provided by paragraphs 9.34, 9.37, 9.40 and 9.41. **MM89**, **MM91**, **MM92** and **MM93** are necessary to the supporting text of these paragraphs respectively to reflect the modifications made to the policy by virtue of **MM88**. Additional text is also necessary to reflect the fact that Policy SI 8 of the London Plan also promotes capacity increases at waste sites to maximise their use to demonstrate that London's land is being used to its highest potential. Consequently, **MM90** explains that applications for waste management development will be required to demonstrate that the waste management capacity on a site has been optimised. These MMs are necessary for the Plan to be effective and in general conformity with the London Plan.
182. The supporting text provided in paragraph 9.42 refers to the need for development proposals to be accompanied by a transport 'Servicing and Delivery Plan' and a 'Construction Logistics Plan' and that consideration should be given to the use of Direct Vision Lorries for all waste vehicles. However, the text does not recognise the relationship with these requirements and the Mayor's 'Vision Zero Action Plan' nor does it refer to the need to give consideration to efficient and sustainable transport movements. **MM94** addresses these matters and is necessary for the Plan to be effective.
183. Criterion (i) of Policy 5 (to be renumbered as criterion 'j') relates to the protection and enhancement of biodiversity. Paragraph 9.44 provides supporting text to explain how this aspect of the policy should be taken into account in the submission of development proposals. However, it does not identify that Borough Council Local Plans also contain detailed local policies relating to biodiversity which, in addition to the advice provided in the Framework, will also need to be taken into account. **MM95** provides modifications to this supporting text and is necessary for effectiveness.
184. Criterion 'k' of the policy (to be renumbered 'l') requires that development should have no adverse impact on flood risk on and off the site. Supporting text to this criterion is provided by paragraph 9.48. However, the paragraph does not adequately explain that development proposals will be required to consider the impact of climate change using the latest published climate change allowances and that a sequential approach to the layout of the site should be adopted to locate development in those parts of a site that is at a lower risk of flooding. **MM96** is necessary to address this matter and is necessary for the Plan to be effective.

### **Policy 6: Energy Recovery and Decentralised Energy**

185. This policy requires that where waste cannot be managed at a higher level in the waste hierarchy it should be used to generate energy, recover excess heat and to provide supply to networks including decentralised energy networks. However, the policy fails to adequately

recognise that this may not always be technically feasible or financially viable to do so. **MM97** provides modifications to the policy to require proposals to demonstrate how they meet, or do not meet, the requirements of the policy through the submission of an Energy Statement. This MM is necessary for the Plan to be effective.

186. Part of the supporting text to Policy 6 is provided by paragraph 9.61. This identifies that work is underway to progress the delivery of the Meridian Water decentralised network in the Lee Valley and that this will connect with other heat sources from waste developments in the Lee Valley including the Edmonton EcoPark. However, the text does not recognise the occurrence of Green Belt in proximity to the Lee Valley. **MM98** is therefore necessary for the Plan to be effective and consistent with national policy to ensure that the openness and permanence of the Green Belt is maintained.

### **Policy 7: Waste Water Treatment Works and Sewage Plant**

187. This policy, amongst other things, identifies that proposals for waste water treatment and sewage plant should meet environmental standards set by the Environment Agency. However, this aspect of the policy is not related to land use planning nor is its compliance in the control of the relevant waste planning authority. Therefore, this part of the policy is inappropriate for inclusion within a development plan document. **MM99** provides for the deletion of this part of the policy and is necessary for the Plan to be consistent with national policy.

### **Policy 8: Inert Waste**

188. This policy identifies the developments for which the use of inert waste will be permitted and includes the restoration of mineral workings and facilitating improvement in the quality of land. However, the policy fails to define these as beneficial uses and is partially inconsistent with the modifications provided by **MM21**. In addition, the policy does not identify the need to ensure that inert waste is also managed as far up the waste hierarchy as possible, including on-site recycling and use, and is therefore inconsistent with Strategic Objective 1 of the Plan. **MM100** provides modifications to the policy to address these matters and is necessary for the Plan to be effective.
189. Corresponding modifications to the supporting text in paragraph 9.68 as a consequence of **MM100** are necessary and are provided by **MM101**.

### **Conclusion on Issue 6**

190. Subject to the recommended MMs, I am satisfied that Plan's policies make appropriate provision for waste management development over the Plan period and provide an adequate balanced approach to protect people and the environment whilst delivering the Plan's aims and

strategic objectives. Accordingly, with those MMs in place, I find this part of the Plan to be sound.

**Issue 7 - Whether the monitoring and implementation framework of the Plan will be effective.**

191. Section 10 of the Plan comprises the monitoring framework that lists the key indicator targets, links with strategic aims and policies and progress towards the delivery of outcomes to monitor the effectiveness of the Plan. It also identifies in tabular form the roles and responsibilities for organisations that have an input into the implementation of the Plan.
192. Paragraph 10.3 identifies that the responsibility for monitoring the achievement of the aims and objectives of the Plan lies with the individual North London Borough Councils. However, the Borough Councils have agreed to monitor the Plan jointly through a lead Borough Agreement and a joint Annual Monitoring Report will be produced. **MM102** provides for these modifications to the Plan's monitoring arrangements in the interests of effectiveness.
193. As a consequence of the modifications made to the tables in Sections 5 and 6 of the Plan, corresponding changes are necessary to the monitoring indicators provided in Table 14. **MM103** provides the necessary modifications.
194. Table 15 of the Plan identifies the roles and responsibilities involved in implementing and monitoring the Plan. In order to be consistent with the modification provided by **MM103**, in respect of the appointment of a lead Borough Council to monitor the Plan, **MM104** is necessary for effectiveness.

**Conclusion on Issue 7**

195. Subject to the recommended MMs, the monitoring and implementation framework is effective and provides a robust framework for monitoring the delivery of the Plan and is sound.

**Issue 8 – Whether the Area Profiles for the Priority Areas as set out in Appendix 2 of the Plan provide appropriate guidance for the submission of development proposals.**

196. Appendix 2 to the Plan identifies the planning constraints, potential waste management uses and potential mitigation measures that need to be considered in any planning applications for waste management development proposals on the Schedule 2 and 3 Priority Areas identified in Table 11.
197. Modification is required to the 'Historic Environment' theme of Area A05 -BA (Connaught Business Centre) to identify that the Area is within

- the Watling Street Archaeological Priority Area and there is a potential for archaeological remains to be found. Consequently, an archaeological assessment should be undertaken as part of any development proposal. This modification is provided by **MM106** and is necessary for the Plan to be effective and to ensure that the archaeological implications of waste management development within the allocated Priority Area are properly taken into account in accordance with national policy.
198. Similarly, modifications are required to the Historic Environment theme of Areas A12-EN (Eleys Estate, Enfield), Area A15-HC (Millfields LSIS) and A21-HR (North East Tottenham) to reflect the fact that these Areas are within the Lee Valley West Bank Archaeological Priority Area, (Area 12-EN) and Lee Valley Archaeological Priority Area (Areas A15-HC and A21-HR). As such, archaeological assessment should be undertaken as part of any development proposals. A further addition is also required to Area A15-HC to reflect the fact that the Hackney Borough Disinfecting Station, which is a Grade II listed building, is also shown on the Heritage at Risk Register. These modifications are provided by **MM107**, **MM108** and **MM112** and are necessary for the Plan to be effective.
199. **MM109** is necessary to modify the 'Flood Risk' theme for Area LLDC1-HC (Bartrip Street) to reflect the fact that the area is largely within Flood Zone 1 with the southernmost part falling partially within Flood Zones 2 and 3. However, the proposed waste use is considered to be 'Less Vulnerable' and the site has been subject to a Sequential Test in the Flood Risk Sequential Test Report (CD1/11) and found to be appropriate for waste management development. As such the exception test would not be applicable. This MM is necessary for the Plan to be effective.
200. Similarly, modifications are required to the Flood Risk theme for Areas LLDC2-HC (Chapman Close) and A19-HR9 (Brantwood Road) to identify that a site-specific flood risk assessment would be required for any waste management redevelopment which will need to incorporate the current climate change allowance at the time of submission. These modifications are provided by **MM110** and **MM111** and are necessary for the Plan to be effective.
201. Similar modifications are also required to the Historic Environment and Flood Risk Themes of Areas A24-WF (Argall Avenue) and LLDC3-WF (Temple Mill Lane) requiring archaeological assessment and site-specific flood assessment to be provided as part of a planning application. These are provided by **MM114** and **MM115** and are necessary for the Plan to be effective.
202. Modifications are necessary to the Area Profile of A22-HR Pinkham Way to reflect the relevant land use designations and policy implications of the development plan. Modifications are also necessary to the Flood

Risk theme to reflect the fact that a site-specific flood risk assessment would be required for any waste management redevelopment.

203. In addition, new text is required to the 'potential mitigation theme' to reflect the fact that the number of land use designations affecting the site mean that only a proportion of the site would be suitable for waste management development. The text identifies that a smaller part of the site is in the ownership of the NWLA and therefore most likely to accommodate waste management development and that the site footprint should be minimised. Any development on the site will need to consider the impacts on biodiversity and how public access to the remainder of the site can be achieved. These modifications are provided by **MM113** and are necessary for the Plan to be effective.

### **Conclusion on Issue 8**

204. Subject to the recommended MMs, the Area Profiles, as set out in Appendix 2, provide appropriate guidance for the submission of development proposals for waste management uses on those areas.

## **Overall Conclusion and Recommendation**

205. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.
206. The North London Borough Councils have requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that the Duty to Cooperate has been met and that, with the recommended main modifications set out in the Schedule of Main Modifications, the North London Waste Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

*Stephen Normington*

INSPECTOR

This report is accompanied by an Appendix containing the Main Modifications.

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# Appendix – Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining and bold font for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

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Ref	Page	Policy/ Paragraph	Main Modification
MM1	1	Paragraph 1.3 and 4.1 (part)	<p>The Aim and <b>Strategic</b> Objectives:</p> <p>[...]</p> <p>The Spatial <b>Principles</b> Framework: The spatial principles flow from the Plan’s <b>Strategic Objectives and provide the strategic direction for the detailed policies of the NLWP and inform site/area selection.</b> <del>This sets out</del> <b>They reflect</b> the physical and planning components that influence the Plan and <b>guide the</b> <del>identifies</del> <b>identification of</b> opportunities and constraints for waste planning in North London.</p>
MM2	18	Paragraph 3.3	<p>Aim of the NLWP</p> <p>“To achieve net self-sufficiency* for LACW, C&amp;I and C&amp;D waste streams, including hazardous waste, <b>seek beneficial use of excavation waste</b>, and support a greener London by providing a planning framework that contributes to an integrated approach to management of materials further up the waste hierarchy. The NLWP will provide sufficient land for the sustainable development of waste facilities that are of the right type, in the right place and provided at the right time to enable the North London Boroughs to meet their <b>identified</b> waste management needs throughout the plan period”.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>* Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste generated in North London, while recognising that some imports and exports will continue. <b>Equivalent capacity will be measured by the amount (tonnes) managed for each waste stream against the projected waste arisings in Table 5.</b></p>
MM3	18	Paragraph 3.4	<p>The <b>Strategic Objectives are the steps needed to achieve the Aim</b> of the draft NLWP. <b>They are delivered through the policies in the Plan and each Strategic Objective signposts the policy or policies through which it will be met. The Strategic Objectives</b> are as follows:</p> <p>[...]</p> <p>SO3. To plan for net self-sufficiency in LACW, C&amp;I, C&amp;D waste streams, including hazardous waste, 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, <b>to seek beneficial use of excavation waste, and to monitor waste exports as part of the ongoing duty to cooperate.</b> Met through Policies 1, 2, 3, 4, and 8</p> <p>[footnote] <del>Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste generated in North London, while recognising that some imports and exports will continue.</del></p>
MM4	15	2.27 [Moved here after 2.25]	<p>The North London Boroughs are all focused on the challenges posed by climate change. Borough strategies are driven by the requirements to mitigate and adapt to all effects of climate change. The NLWP aims to deliver effective waste and resource management which makes a positive and lasting contribution to sustainable development and to combating climate change. <b>In particular this includes reducing the reliance on disposal to landfill sites outside London, lowering emissions from road transport, ensuring new waste facilities generating energy meet</b></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<b>the Mayor's Carbon Intensity Floor, directing new development to the most appropriate sites and taking into account the greater occurrence of urban flood events.</b>
MM5	20	4.2	The Spatial <b>Principles Framework</b> flow from the Plan's Strategic Objectives and provides the strategic direction for the detailed policies of the NLWP and informs site/area selection. <b>The principles take account of the spatial and wider policy context, the Plan's evidence base and the views of stakeholders.</b> The Spatial <b>Principles Framework</b> also guides the assessment of the suitability of windfall sites under Policy 3. <del>It</del> <b>They</b> reflects the complexities and realities of planning at a sub-regional level taking into account varied characteristics and functions across the seven boroughs, from densely populated urban areas to stretches of Green Belt. Competing and changing land uses, especially release of industrial land for housing, is a key issue for the boroughs.
MM6	22	4.11 (part)	The current and changing character of each borough's industrial land is a consideration in identifying locations for new waste infrastructure. Larger and co-located facilities are more suited to areas with similar existing uses away from sensitive receptors. A future waste industry focused on resource management may derive positive cumulative impacts from a concentration of facilities. Conversely, the urban environments of NLWP boroughs are restricted by severe physical constraints limiting opportunities for some types of waste facilities. In addition, <del>some areas, such as</del> <b>most waste facilities would be regarded as inappropriate development in</b> the protected Green Belt in the north, will be largely out of bounds for any built waste facilities <b>unless very special circumstances justifying the use of Green Belt land have been demonstrated.</b> As population and densities in the plan area increase with projected growth, fewer areas away from sensitive receptors will be available. Continued development of waste facilities in areas which have, and continue to provide, significant waste capacity could have wider implications on the regeneration of the local economy. When choosing locations for future development, the benefits of co-location will need to be balanced against the cumulative impacts which can arise from an accumulation of facilities in one location. Cumulative impacts can include traffic levels, noise and odours. There may be times when the cumulative impacts of several waste developments operating in an area would be considered unacceptable.

Ref	Page	Policy/ Paragraph	Main Modification
MM7	22	New after 4.11	<b>Figure 9 shows that there is a concentration of existing waste sites in the Lee Valley corridor, mainly in Enfield. Indeed, Enfield contributes 62% of the land currently in waste use in North London, compared to 18% in Barnet, 12% in Haringey and 5% or less in the remaining Boroughs. The NLWP has the opportunity to address concerns that there is an over-concentration of waste facilities in Enfield by promoting a better geographic spread of sites across North London and create a more sustainable pattern of waste development.</b>
MM8	22	4.12	<p><b>While all industrial land in North London is suitable 'in principle' for waste uses, there are certain locations which are more suitable than others to provide the waste capacity needed. Section 8 of the NLWP sets out how 'Priority Areas' for new waste facilities in North London were identified. One of the considerations was creating a better geographical spread, and this has been sought by limiting the number of Priority Areas within Enfield. The NLWP takes an area-based approach to waste planning and identifies certain industrial and employment areas as in principle more suitable for waste use but where the land is not specifically safeguarded for waste. The area-based approach allows for flexibility in bringing forward a range of locations across North London which is combined with policy to promote areas outside Enfield first (see Policy 2). This is supported by annual monitoring to check that land for waste capacity is being taken up as anticipated (see Chapter 10 monitoring indicator IN3). In addition, the NLWP supports the intensification of existing waste facilities where appropriate to optimise their throughput (see Policy 1).</b></p> <p>[separate here to new para]</p> <p><del>Policy 2 seeks to extend the existing spread of locations for waste facilities by identifying locations which are suitable for new waste facilities, taking into account</del> <b>In combination, existing waste sites and the 'Priority Areas' are considered a sustainable network of waste facilities because they present sufficient opportunity to meet North London's waste capacity needs and net self-sufficiency targets while promoting a better geographical spread.</b></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><b>They will help reduce movements of waste, including waste exports and increase opportunities for waste to be managed in proximity to its source. New waste facilities will be directed towards the most suitable land in North London when assessed against the planning criteria (see Table 10) as well as factors such as the character of different areas, changing land uses and availability of suitable industrial land. Policy 2 identifies these Priority Areas in Schedules 2 and 3. Outside of the Priority Areas, where demand arises, opportunities to improve the spread of waste sites across the area are supported through Policy 3: Windfall Sites where they adhere to the site assessment criteria set out in section 8.</b></p>
MM9	25	New after 4.17	<p><b>Co-location of facilities with complementary activities will be encouraged through Policy 2, which directs new waste uses to Priority Areas and provides a spatial focus towards land with similar existing uses away from sensitive receptors. Policy 3: Windfall Sites allows for opportunities of locating recycling facilities near to a reprocessing plant that could use the recyclate material. Policy 5 requires developers to consider the possible benefits of co-locating waste development as well as any potential cumulative impacts.</b></p>
MM10	27	4.18	<p>The NPPW recognises the benefits of co-location of waste facilities with end users of their energy outputs. The London Plan supports the development of combined heat and power systems and provision of heat and power to surrounding consumers <b>Policy SI8 encourages proposals for materials and waste management sites where they contribute towards renewable energy generation and/or are linked to low emission combined heat and power and/or combined cooling heat and power (CHP is only acceptable where it will enable the delivery or extension of an area-wide heat network consistent with Policy SI3 Part D1e). The same policy requires expects facilities generating energy from waste to meet, or to demonstrate that steps are in place to meet in the near future, a minimum performance of 400g of CO2 equivalent per kilowatt hour of electricity produced.</b></p>
MM11	28	4.26	<p>Road transport will continue to be the principal method of transporting waste in North London, particularly over shorter distances where this is more flexible and cost effective. <b>The efficient use of transport networks combined with good logistics and operational practices can</b></p>

Ref	Page	Policy/ Paragraph	Main Modification												
			<p><b>make a significant contribution towards the level of transport sustainability achieved. The transportation of waste as well as other traffic movements to and from sites can impact on amenity along the routes used. Policy 5 will seek to minimise such impacts where possible, for example through the use of ultra-low and zero emission vehicles.</b></p> <p>Access to transport networks including sustainable transport modes was considered when assessing the suitability of new sites and areas. Rail and <b>water</b> road transport is particularly desirable when waste is travelling long distances. Policy 5 considers sustainable transport modes in planning decisions.</p>												
MM12	29	New after 5.3	<p><b>A Data Study Addendum (2020) was prepared to support the Main Modifications to the NLWP. The Data Study Addendum proposes modifications to the way data is presented in the NLWP so that the reader can more readily follow the line of justification and reasoning behind the approach to waste management in North London.</b></p>												
MM13	30	New after Fig 8	<p><b>How North London's waste is currently managed</b></p> <p><b>Around 66% of waste generated in North London is managed in North London, excluding excavation waste. The amounts of North London's waste managed within North London and elsewhere is set out in Table 2. This section sets out how and where each waste stream is currently managed.</b></p>												
MM14	37	Revised Table 4 renumbered Table 2	<p><b>Table 24: The amount of North London's waste managed in North London and elsewhere (2016)</b> <del>Waste recorded as exported from North London to landfill 2011-2016</del></p> <table border="1"> <thead> <tr> <th>Waste Stream</th> <th>Waste arising</th> <th>Amount managed in North London</th> <th>Amount managed elsewhere in London</th> <th>Amount exported to landfill outside London</th> <th>Amount exported to other facilities outside London</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Waste Stream	Waste arising	Amount managed in North London	Amount managed elsewhere in London	Amount exported to landfill outside London	Amount exported to other facilities outside London						
Waste Stream	Waste arising	Amount managed in North London	Amount managed elsewhere in London	Amount exported to landfill outside London	Amount exported to other facilities outside London										

Ref	Page	Policy/ Paragraph	Main Modification					
			<b>LACW</b>	<b>845,776</b>	<b>718,900</b>	<b>1,000</b>	<b>68,900</b>	<b>56,900</b>
			<b>C&amp;I</b>	<b>762,301</b>	<b>402,900</b>	<b>34,600</b>	<b>251,600</b>	<b>73,000</b>
			<b>C&amp;D</b>	<b>443,180</b>	<b>248,000</b>	<b>108,225</b>	<b>30,200</b>	<b>31,000</b>
			<b>Hazardous (HWDI)</b>	<b>53,420</b>	<b>313</b>	<b>12,663</b>	<b>8,557</b>	<b>31,887</b>
			<b>Proportion</b>		<b>66%</b>	<b>7.5%</b>	<b>17%</b>	<b>9%</b>
			<b>Excavation</b>	<b>747,242</b>	<b>52,523</b>	<b>335,862</b>	<b>265,415</b>	<b>82,463</b>
			<b>Proportion</b>		<b>7%</b>	<b>45%</b>	<b>35.5%</b>	<b>11%</b>
MM15	39	5.29 [moved here after 5.8]	<p><b>Some of this capacity will be provided by existing facilities which import waste from outside North London.</b> In 2016, around 1 million tonnes of waste was imported in to North London. Most of the imported waste comes from immediate neighbours in Greater London, the South East and East of England and is managed in transfer stations, treatment facilities and metal recycling sites. <del>Some</del> <b>The type of</b> facilities in North London <del>have</del> <b>with</b> a wider-than-local catchment area <del>and manage waste from outside North London.</del> This include recycling and treatment facilities, in particular metal recycling and end of life vehicle (ELV) facilities as well as facilities for the processing of CDE in to recycled aggregate products for resale. <b>Waste will continue to be imported into North London over the plan period in line with market demands.</b> <del>The extra capacity contributes to achieving net self sufficiency, or managing the equivalent of the overall quantity of waste within the main categories for North London and London as a whole.</del></p>					
MM16	37	5.27	<p>In 2016, <del>1,201,964</del> <b>1.4 million</b> tonnes of waste was <b>recorded</b> as exported from North London, <del>56%</del> <b>675,788 tonnes</b> of which went to landfill. <b>Most of the waste deposited to landfill was excavation waste (65%) followed by LACW/C&amp;I (35%).</b> Exports <b>of LACW to landfill</b> <del>in the LACW/C&amp;I category</del> have been steadily declining in recent years, <del>however an increase was shown in 2016.</del> This is consistent <b>in line</b> with the waste strategies of the London Mayor and the North London Waste Authority which aim to reduce the amount of waste going to landfill. <del>Therefore the increase in 2016 of exports to landfill in this category can probably be attributed to commercial and industrial waste, although the data does not identify why this has occurred.</del> <b>Data for hazardous waste exports to landfill is shown from both the Waste Data Interrogator</b></p>					

Ref	Page	Policy/ Paragraph	Main Modification
			<p><b>(WDI) and the Hazardous Waste Data Interrogator (HWDI). The HWDI is the more accurate of the two for hazardous waste, but the total exports to landfill figure is taken from the WDI only.</b> Exports of CD&amp;E waste generally follow patterns of waste arising, so when more CD&amp;E waste is generated, more is exported. This pattern is shown in Table 4 and Figure 10 below.</p>
MM17	37	New [after 5.27]	<p><b>Local planning authorities have a duty to cooperate with each other on strategic matters that cross administrative boundaries. Exports of waste from one waste planning authority to another is a strategic cross-boundary matter and is an important consideration in assessing the effectiveness of the NLWP. It is therefore important to understand the destination of North London's waste exports and to understand any issues which could prevent similar amounts of waste being exported in the future.</b></p> <p><b>Although North London is planning for capacity to meet the equivalent of 100% of its waste arisings, North London has no landfill sites and is not planning to open any landfill sites. This means that waste arising in London which cannot be recycled or recovered and can only be disposed of to landfill will continue to do so. Table 5 identifies the amount of waste which is expected to be disposed of to landfill over the plan period and this will form part of the annual monitoring to ensure that duty to co-operate engagement takes place if there are significant changes from current and anticipated waste exports to landfill.</b></p> <p><b>It should be noted that exports from and imports into North London are not a measure of North London's net self-sufficiency. Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste need in North London, while recognising that some imports and exports will continue. For most waste streams, the market dictates where the waste is managed, however the more capacity there is within North London, the more opportunity for North London's waste to be managed within its own boundaries.</b></p>

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MM18	39	5.32	<p>Nonetheless, as set out in the exports to landfill paper, alternative capacity at other potential destinations has been identified for the amount of waste currently being exported to those sites earmarked for closure during the plan period. <b>It is recognised that non-hazardous landfill capacity in the wider south east is declining and no new non-hazardous landfill sites are being put forward by waste operators. A small number of new inert waste sites are being put forward in former mineral works. The lack of landfill capacity in the wider south east is an issue for all WPAs preparing plans and there is a continuing need to plan to manage waste further up the waste hierarchy to help reduce the need for landfill capacity.</b> The paper shows that There is opportunity for the market to find are both alternative destinations sites and adequate void space in London, South East and East of England for to take North London's 'homeless' waste in the short term between 2018 and 2035. In the longer term, beneficial use of excavation waste and the Circular Economy Statements will assist the North London Boroughs to reduce exports of waste to landfill and monitor the destinations of waste exports.</p> <p>[Moved from 5.31]</p> <p>The destination of waste is largely dependent on market forces and therefore it is not possible to identify specific alternative destinations where North London's waste will go after the closure of landfill sites during the plan period.</p> <p>[Moved from 7.6]</p> <p>The North London Boroughs have established that there is opportunity for the market to find alternative destinations in the wider south east for any of North London's 'homeless' waste in the short term. In the longer term, beneficial use of excavation waste and the Circular Economy Statements will assist the North London Boroughs to reduce exports of waste to landfill and monitor the destinations of waste exports.</p>
MM19	41	6.3 and Table 5	Targets for <b>North London's</b> waste <b>management</b> managed within North London

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		renumbered Table 3	<p>The North London Boroughs have statutory duties to meet recycling and recovery targets and the NLWP will need to be ambitious in order to achieve European Union, national, regional and local targets. These targets taken <b>from the London Plan (March 2021)</b> are as follows:</p> <p>Table <b>35</b>: Recycling and Recovery Targets with 2016 Baseline</p> <table border="1"> <thead> <tr> <th>Waste Stream</th> <th>Target</th> <th>2016 baseline</th> </tr> </thead> <tbody> <tr> <td>LACW</td> <td><del>50% recycling for LACW by 2025 (€ Contributing towards 65% recycling of municipal waste by 2030)</del></td> <td>279%</td> </tr> <tr> <td>C&amp;I</td> <td><del>75% recycling by 2030 (€ Contributing towards 65% recycling of municipal waste by 2030)</del></td> <td>4452%</td> </tr> <tr> <td>C&amp;D</td> <td>95% <b>reuse/recycling/recovery</b> by 2020</td> <td>9350-60%</td> </tr> <tr> <td><b>Excavation</b></td> <td><b>95% beneficial use</b></td> <td><b>Not known</b></td> </tr> <tr> <td>Biodegradable or recyclable waste</td> <td>Zero biodegradable or recyclable waste to landfill by 2026</td> <td>Not known</td> </tr> <tr> <td><b>Hazardous</b></td> <td><b>Included in LACW, C&amp;I and C&amp;D targets</b></td> <td><b>N/A</b></td> </tr> </tbody> </table>	Waste Stream	Target	2016 baseline	LACW	<del>50% recycling for LACW by 2025 (€ Contributing towards 65% recycling of municipal waste by 2030)</del>	279%	C&I	<del>75% recycling by 2030 (€ Contributing towards 65% recycling of municipal waste by 2030)</del>	4452%	C&D	95% <b>reuse/recycling/recovery</b> by 2020	9350-60%	<b>Excavation</b>	<b>95% beneficial use</b>	<b>Not known</b>	Biodegradable or recyclable waste	Zero biodegradable or recyclable waste to landfill by 2026	Not known	<b>Hazardous</b>	<b>Included in LACW, C&amp;I and C&amp;D targets</b>	<b>N/A</b>
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MM20	34	5.13	<p>The European Commission has put forward a Circular Economy Package'. This includes a 65% recycling target for municipal waste (LACW and C&amp;I) by 2030. Notwithstanding the UK leaving the EU, the UK has signed up to delivering these targets as part of Brexit. <b>The Circular Economy Package (CEP) recycling target of 65% municipal waste by 2030 has been superseded by the London Environment Strategy (LES) published in May 2018 in time to be incorporated into the NLWP. The LES aims to achieve 65% recycling from London's municipal waste by 2030; this will be achieved through a 50% recycling rate from LACW by 2025 (LES Policy 7.2.1) and 75% from business waste by 2030 (LES policy 7.2.2). The LES therefore goes further than the CEP by bringing forward London's LACW recycling target to 2025. The LES states that the Mayor expects waste authorities to collectively achieve a 50 per cent LACW recycling target by 2025 and aspire to achieve</b></p>																					

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			<p><b>45% household waste recycling by 2025 and 50% by 2030. Responsibility falls largely to London Boroughs in their capacity as waste collection and waste disposal authorities. The NLWA are expected to contribute to the Mayor’s targets and produce a waste strategy to show they are acting in conformity with the LES policies and proposals (see LES Box 36).</b> <del>These revised targets have been built into NLWP waste modelling work as part of the revisions to the Data Study, however the new targets have only been applied to C&amp;I waste as it is assumed no change to the projections of the NLWA at this time.</del></p>
MM21	36	5.21	<p>[Part of 5.21 moved here]</p> <p>The London Plan (<b>March 2021</b>) includes a target of 95% <b>reuse/recycling/recovery of C&amp;D waste</b> <del>CD&amp;E by 2020</del> <b>and 95% beneficial use of excavation waste. Beneficial use could include using excavated material within the development, or in habitat creation, flood defences or landfill restoration. Preference should be given to using the materials on-site or within local projects.</b></p>
MM22	41	6.4 (part)	<p>Options for managing <b>modelling</b> North London’s <b>future</b> waste <b>arisings</b></p> <p>In accordance with the NPPF (paragraph 35) to ensure the NLWP is justified, a range of options were tested as part of the consideration of reasonable alternatives for <del>managing</del> <b>modelling</b> North London’s waste <b>arisings over the plan period. Analysis of and consultation on these options led</b> leading to <del>the</del> selection of <del>the</del> a preferred strategy. <b>These options seek to reflect the effects of future economic activity, including fiscal, financial and legislative factors such as landfill tax charges driving waste away from landfill, and financial incentives such as ROCs (Renewable Obligations Certificates) increasing the competitiveness of energy recovery. Employment growth is based on demographic projections of employment in the London Plan using North London Borough employment projections and is applied to the growth rates for the C&amp;I and CD&amp;E streams. For the LACW stream, the NLWA have provided the projections which have been used to inform the application for a Development Consent Order to enable them to develop and operate an Energy</b></p>

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			<p><b>Recovery Facility (ERF) at the Edmonton EcoPark from 2026.</b> The scenarios considered <b>are summarised in Table 4, with the preferred scenarios highlighted.</b> looked at a range of options for recycling from maintaining the status quo to seeking to maximise opportunities for recycling in line with the targets set out in Table 5 above, the latter option being the most popular option and taken forward. Along with this a number of options were also considered in relation to waste growth over the plan period and what impact that would have on waste growth, again 3 approaches were modelled looking at no growth, growth in line with the London Plan (March 2016) for C&amp;I and CDE waste — with LACW growth being in line with that of the NLWA for all options, a minimised growth was also modelled but was not considered in line with the growth planned for in the London Plan (March 2016), as such growth was modelled in line with the London Plan (March 2016).</p> <p>[Moved down to after new Table 5]</p> <p>[An Options Appraisal Report (2018) has been prepared which provides more detail on each of the options considered and provides information on the different scenarios including how much waste would be generated over the plan period (incorporating economic and population growth assumptions), how much waste could be managed within North London (capacity strategy), and how this waste should be managed (management strategy) for each of the options considered. The preferred option identified in the Options Appraisal has been carried through to the NLWP. The preferred option seeks to achieve growth in line with the London Plan (March 2016) and to deliver the targets set out in the Mayor’s Environment Strategy.]</p>																		
MM23	41	New Table after 6.4	<p><b>Table 4: Options considered for forecasting North London’s waste arisings and need</b></p> <table border="1" data-bbox="660 1177 2121 1367"> <thead> <tr> <th data-bbox="660 1177 929 1219">LACW</th> <th data-bbox="929 1177 1191 1219">C&amp;I</th> <th data-bbox="1191 1177 1420 1219">C&amp;D</th> <th data-bbox="1420 1177 1682 1219">Excavation</th> <th data-bbox="1682 1177 1910 1219">Hazardous</th> <th data-bbox="1910 1177 2121 1219">Agricultural</th> </tr> </thead> <tbody> <tr> <td colspan="6" data-bbox="660 1219 2121 1260" style="text-align: center;"><b>Capacity options</b></td> </tr> <tr> <td data-bbox="660 1260 929 1367"><b>Meeting the London Plan apportionment</b></td> <td data-bbox="929 1260 1191 1367"><b>Meeting the London Plan apportionment</b></td> <td data-bbox="1191 1260 1420 1367"><b>Baseline (no change)</b></td> <td data-bbox="1420 1260 1682 1367"><b>Baseline (no change)</b></td> <td data-bbox="1682 1260 1910 1367"><b>Baseline (no change)</b></td> <td data-bbox="1910 1260 2121 1367"><b>Baseline (no change)</b></td> </tr> </tbody> </table>	LACW	C&I	C&D	Excavation	Hazardous	Agricultural	<b>Capacity options</b>						<b>Meeting the London Plan apportionment</b>	<b>Meeting the London Plan apportionment</b>	<b>Baseline (no change)</b>	<b>Baseline (no change)</b>	<b>Baseline (no change)</b>	<b>Baseline (no change)</b>
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			Net self-sufficiency	Net self-sufficiency	Net self-sufficiency	Managing as much as possible in North London	Net self-sufficiency	
			Self-sufficiency	Self-sufficiency	Self-sufficiency		Self-sufficiency	
<b>Growth Options</b>								
				No growth (0% pa)	No growth (0% pa)	No growth (0% pa)	No growth (0% pa)	No growth (0% pa)
				Minimised growth (0.40% pa)	Minimised growth (0.40% pa)	Minimised growth (0.40% pa)	Minimised growth (0.40% pa)	
			NLWA Waste Forecasting Model3	Growth (0.81% pa)	Growth (0.81% pa)	Growth (0.81% pa)	Growth (0.81% pa)	
<b>Management Options</b>								
				Baseline (no change)	Baseline (no change)	Baseline (no change)	Baseline (no change)	Baseline (no change)
				Median 80% recycling by 2035 16% Energy Recovery by 2035 4% to Landfill by 2035	Median 85% recycling 9% treatment 6% landfill			
			NLWA Forecasting model Central Scenario 44% recycling by	Maximised 85% Recycling by 2035 12% Energy Recovery by	Maximised 95% recycling / recovery /	Maximised 95% beneficial use 5% landfill		

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			2035 (50% HH recycling by 2035) 55% Energy Recovery by 2035 1% landfill	2035 3% to Landfill by 2035	reuse 5% landfill			
MM24	41	6.4 (part) [Moved to after new Table 5]	<p><b>Further details of these options is available in NLWP Data Study 2.</b> An Options Appraisal Report (2019<del>8</del>) has also been prepared which provides more detail on each of the options considered and provides information on the different scenarios including how much waste would be generated over the plan period (incorporating economic and population growth assumptions), how much waste could be managed within North London (<del>capacity strategy</del> <b>net self-sufficiency options</b>), and how this waste should be managed (<del>management strategy</del> <b>options</b>) for each of the options considered. <b>Meeting North London's LACW, C&amp;I and C&amp;D waste arisings, including hazardous waste, was the preferred net self-sufficiency option because it is compliant with national legislation on managing all main waste streams. In addition, it demonstrates to neighbouring authorities outside London that North London intends to manage as much of its own waste as possible and reduce exports. Growth of 0.81% was chosen as the preferred option because GLA evidence and projections anticipate substantial population and economic growth in London over the next few decades. Maximised Recycling was chosen as the preferred option for the management strategy because it aligns with national, regional and local recycling targets. This option also means that more waste will be managed further up the waste hierarchy with more opportunity to divert waste away from landfill.</b> <del>The preferred option identified in the Options Appraisal has been carried through to the NLWP. The preferred option seeks to achieve growth in line with the London Plan (March 2016) and to deliver the targets set out in the Mayor's Environment Strategy.</del></p>					
MM25	42	New below 6.6	<p><b>The results of the modelling of the preferred strategy for waste arisings over the plan period is set out in Table 5 below. The baseline data for these projections are the waste arisings figures set out in Table 1 of this plan. These figures represent two sets of projections. The first is how North London's waste is most likely to be managed over the</b></p>					

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			<p>plan period, aligned with the levels in the waste hierarchy (see STRATEGIC OBJECTIVE 1). While some of North London's waste will still be exported for management or disposal to landfill, the aim of the NLWP is to deliver the equivalent capacity for LACW, C&amp;I, C&amp;D and hazardous waste within its administrative borders. Therefore Table 5 also shows the total amount of waste arising in North London which the Boroughs need to provide capacity for (net self-sufficiency). This is in line with STRATEGIC OBJECTIVE 3 which is to plan for net self-sufficiency by providing opportunities to manage as much as practicable of North London's waste within the Plan area. Prevention and re-use also have a part to play, but in terms of waste management capacity in North London, recovery and recycling will play the most substantial part.</p> <p>Table 8 sets out waste arisings over the plan period and how much of the total will need to be recycled to meet the Mayor's targets shown in Table 3. The LACW figures in Table 5 are taken from the NLWP data study which reflects the NLWA modelling. The NLWA model is based on achieving 50% household waste recycling. Over 80% of total LACW is household waste and the remainder is mostly business waste. The NLWA model assumes business waste recycling improves gradually over time as business waste recycling continues to be encouraged and recycling behaviours change. The combined household and business waste recycling rate in the NLWA model is 44%. In order to meet the Mayor's target of 65% recycling of municipal waste by 2030, around 85% of the 'municipal' portion of the C&amp;I waste stream needs to be recycled. The 'municipal' portion of the C&amp;I waste stream is estimated to be around two thirds of the total [footnote]. The recycling rates for the municipal portion of the C&amp;I waste stream rise to 85% by 2030 which, together with household and business waste recycling in the LACW waste stream, achieves 65% recycling of municipal waste by 2030 in line with the Mayor's target. The C&amp;D waste stream has a recycling rate of 95% and excavation waste a beneficial use rate of 95% in line with the London Plan targets.</p> <p>[footnote] Separate figures for municipal and other C&amp;I waste are set out in the Data Study Addendum Appendix A: Waste arisings forecast scenario taken forward in the NLWP.</p>

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MM26	48	Table 8 renumbered Table 5 [revised and moved here]	<p><b>Table 5: Projected arisings and management of North London's waste 2020-2035</b></p> <table border="1"> <thead> <tr> <th>Waste Stream</th> <th>Facility Type</th> <th>2020</th> <th>2025</th> <th>2030</th> <th>2035</th> </tr> </thead> <tbody> <tr> <td>LACW</td> <td>Recycling</td> <td>418,169</td> <td>424,049</td> <td>430,280</td> <td>436,824</td> </tr> <tr> <td>LACW</td> <td>Recovery (EfW), Treatment</td> <td>566,872</td> <td>572,856</td> <td>579,725</td> <td>587,352</td> </tr> <tr> <td>LACW</td> <td>Landfill</td> <td>2,000</td> <td>2,000</td> <td>2,000</td> <td>2,000</td> </tr> <tr> <td colspan="2"><b>Total LACW arisings (capacity required for net self-sufficiency)</b></td> <td><b>987,041</b></td> <td><b>998,905</b></td> <td><b>1,012,005</b></td> <td><b>1,026,176</b></td> </tr> <tr> <td>C&amp;I</td> <td>Recycling</td> <td>525,853</td> <td>566,563</td> <td>609,743</td> <td>634,983</td> </tr> <tr> <td>C&amp;I</td> <td>Recovery (EfW), Treatment</td> <td>152,448</td> <td>142,523</td> <td>131,513</td> <td>136,957</td> </tr> <tr> <td>C&amp;I</td> <td>Landfill</td> <td>109,139</td> <td>110,951</td> <td>112,726</td> <td>117,392</td> </tr> <tr> <td colspan="2"><b>Total C&amp;I waste arisings (capacity required for net self-sufficiency)</b></td> <td><b>787,440</b></td> <td><b>820,037</b></td> <td><b>853,982</b></td> <td><b>889,332</b></td> </tr> <tr> <td>C&amp;D</td> <td>Recycling</td> <td>435,054</td> <td>453,063</td> <td>471,816</td> <td>491,347</td> </tr> <tr> <td>C&amp;D</td> <td>Landfill</td> <td>22,742</td> <td>23,683</td> <td>24,664</td> <td>25,685</td> </tr> <tr> <td colspan="2"><b>Total C&amp;D waste arisings (capacity required for net self-sufficiency)</b></td> <td><b>457,796</b></td> <td><b>476,746</b></td> <td><b>496,480</b></td> <td><b>517,032</b></td> </tr> <tr> <td>Hazardous</td> <td>Recycling</td> <td>16,838</td> <td>16,838</td> <td>16,838</td> <td>16,838</td> </tr> <tr> <td>Hazardous</td> <td>Recovery, Treatment</td> <td>23,846</td> <td>23,846</td> <td>23,846</td> <td>23,846</td> </tr> <tr> <td>Hazardous</td> <td>Landfill</td> <td>12,737</td> <td>12,737</td> <td>12,737</td> <td>12,737</td> </tr> <tr> <td colspan="2"><b>Total Hazardous waste arisings (capacity required for net self-sufficiency)</b></td> <td><b>53,421</b></td> <td><b>53,421</b></td> <td><b>53,421</b></td> <td><b>53,421</b></td> </tr> <tr> <td>Excavation</td> <td>Beneficial use, Recycling, Treatment</td> <td>733,294</td> <td>763,647</td> <td>795,257</td> <td>828,176</td> </tr> <tr> <td>Excavation</td> <td>Landfill</td> <td>38,594</td> <td>40,192</td> <td>41,856</td> <td>43,588</td> </tr> <tr> <td colspan="2"><b>Total Excavation waste arisings</b></td> <td><b>771,888</b></td> <td><b>803,839</b></td> <td><b>837,113</b></td> <td><b>871,764</b></td> </tr> </tbody> </table>	Waste Stream	Facility Type	2020	2025	2030	2035	LACW	Recycling	418,169	424,049	430,280	436,824	LACW	Recovery (EfW), Treatment	566,872	572,856	579,725	587,352	LACW	Landfill	2,000	2,000	2,000	2,000	<b>Total LACW arisings (capacity required for net self-sufficiency)</b>		<b>987,041</b>	<b>998,905</b>	<b>1,012,005</b>	<b>1,026,176</b>	C&I	Recycling	525,853	566,563	609,743	634,983	C&I	Recovery (EfW), Treatment	152,448	142,523	131,513	136,957	C&I	Landfill	109,139	110,951	112,726	117,392	<b>Total C&amp;I waste arisings (capacity required for net self-sufficiency)</b>		<b>787,440</b>	<b>820,037</b>	<b>853,982</b>	<b>889,332</b>	C&D	Recycling	435,054	453,063	471,816	491,347	C&D	Landfill	22,742	23,683	24,664	25,685	<b>Total C&amp;D waste arisings (capacity required for net self-sufficiency)</b>		<b>457,796</b>	<b>476,746</b>	<b>496,480</b>	<b>517,032</b>	Hazardous	Recycling	16,838	16,838	16,838	16,838	Hazardous	Recovery, Treatment	23,846	23,846	23,846	23,846	Hazardous	Landfill	12,737	12,737	12,737	12,737	<b>Total Hazardous waste arisings (capacity required for net self-sufficiency)</b>		<b>53,421</b>	<b>53,421</b>	<b>53,421</b>	<b>53,421</b>	Excavation	Beneficial use, Recycling, Treatment	733,294	763,647	795,257	828,176	Excavation	Landfill	38,594	40,192	41,856	43,588	<b>Total Excavation waste arisings</b>		<b>771,888</b>	<b>803,839</b>	<b>837,113</b>	<b>871,764</b>
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<b>Total Hazardous waste arisings (capacity required for net self-sufficiency)</b>		<b>53,421</b>	<b>53,421</b>	<b>53,421</b>	<b>53,421</b>																																																																																																																
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Excavation	Landfill	38,594	40,192	41,856	43,588																																																																																																																
<b>Total Excavation waste arisings</b>		<b>771,888</b>	<b>803,839</b>	<b>837,113</b>	<b>871,764</b>																																																																																																																

Ref	Page	Policy/ Paragraph	Main Modification					
			Agricultural	Recycling	89	89	89	89
			Agricultural	Recovery, Treatment	9,130	9,130	9,130	9,130
			Agricultural	Landfill	4	4	4	4
			<b>Total Agricultural waste arisings</b>		<b>9,223</b>	<b>9,223</b>	<b>9,223</b>	<b>9,223</b>
MM27	30	5.5 [Moved here after Table 8]	<p>Existing capacity</p> <p>Table <del>63</del> below <b>summarises</b> shows the existing (201<del>68</del>) <b>capacity of North London's</b> waste management facilities in North London by type <b>of facility</b> and waste stream managed and changes in available capacity at known dates when facilities come on stream/close. It identifies an existing waste management capacity of around 4.4 <b>just over a million tonnes per annum of recycling/composting for the LACW and C&amp;I waste streams, just under 600,000 tonnes per annum of energy recovery for LACW, around 630,000 tonnes per annum of recycling and treatment for CD&amp;E waste, and about 4,250 tonnes of hazardous waste capacity</b> reducing to around 3.8 million tonnes by 2029 as a result of known closure of some existing sites up to 2028. Figure <del>59</del> shows the location of the facilities represented in Table <del>63</del> and a full list is in Appendix 1.</p>					

Ref	Page	Policy/ Paragraph	Main Modification																					
MM28	31	Table 3 renumbered Table 6 [Revised and moved here after 5.5]	<p>Table <del>63</del>: <del>Maximum Existing Annual Capacity at Licensed Operational Waste Management Facilities at the Start of the Plan Period and a key dates following changes in sites capacities</del></p> <table border="1"> <thead> <tr> <th colspan="2">Type of capacity</th> <th>Waste stream</th> <th>Existing capacity (2016)</th> </tr> </thead> <tbody> <tr> <td rowspan="6" style="writing-mode: vertical-rl; transform: rotate(180deg);">Management</td> <td rowspan="3">Recycling/Composting/Treatment</td> <td>LACW / C&amp;I</td> <td>1,062,424</td> </tr> <tr> <td>CD&amp;E</td> <td>633,436</td> </tr> <tr> <td>Hazardous</td> <td>4,252</td> </tr> <tr> <td>Energy Recovery</td> <td>LACW / C&amp;I</td> <td>597,134</td> </tr> <tr> <td>Transfer</td> <td>All</td> <td>1,225,068</td> </tr> <tr> <td>Landfill</td> <td>All</td> <td>0</td> </tr> </tbody> </table> <p><b>Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2012-2016</b></p>	Type of capacity		Waste stream	Existing capacity (2016)	Management	Recycling/Composting/Treatment	LACW / C&I	1,062,424	CD&E	633,436	Hazardous	4,252	Energy Recovery	LACW / C&I	597,134	Transfer	All	1,225,068	Landfill	All	0
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	Landfill	All	0																					
MM29	32	5.6 [Moved here]	<p><b>The London Plan defines the technologies and processes which constitute 'managing' waste and these have been applied to North London's facilities when calculating capacity. Only facilities which recycle and compost waste or recover energy from waste count towards waste 'management' in North London. Transfer Stations are therefore excluded from this total, although many facilities categorised as 'transfer stations' do some recycling and where recycling takes place at transfer stations this has been noted in the site profiles and added to the total in Table 6.</b> <del>When considering the overall amount of waste generated identified in Table 2 against the current capacity of waste management facilities in North London identified in Table 3, there appears to be more than enough waste management capacity. However, this does not take into account the specialism of each type of facility or</del></p>																					

Ref	Page	Policy/ Paragraph	Main Modification
			<del>importantly, since North London is a net exporter of waste in terms of tonnage, imports to and exports from the area.</del>
MM30	32	New paragraph after repositioned 5.6	<p><b>Changes to Capacity over the Plan Period</b></p> <p><b>Waste management capacity in North London will change over the plan period with some facilities moving or closing down and new facilities being built. This section sets out what we currently know about such changes.</b></p>
MM31	55	8.5 Moved here	<p>Edmonton EcoPark</p> <p>A Development Consent Order (DCO) has been approved by the Secretary of State for <del>a the</del> new <b>Energy Recovery Facility (ERF)</b> which will manage the treatment of the residual element of LACW during the NLWP plan period and beyond. <b>The existing Edmonton EfW provides just under 600,000 tonnes of waste management capacity per annum and the new facility will provide around 700,000 tonnes per annum. This is an additional 100,000 tonnes which has been built into the calculation for the capacity gap.</b> <del>The replacement facility, expected to be operational from 2025, will generate power for around 127,000 homes and provide heat for local homes and businesses as part of a decentralised energy network known as the Lee Valley Heat Network, trading as energetik.</del></p>
MM32	55	8.6 Moved here	<p>The NLWA's DCO allows for the loss of the composting plant at the Edmonton EcoPark site in 2020 to make way for the new ERF facility to be built whilst maintaining the current EfW operation <b>and the NLWA are not intending to build a replacement facility. This will result in a capacity loss of around 35,200 tonnes per annum. This has also been built into the calculation of the capacity gap.</b> The development also includes a Resource Recovery Facility (RRF) including a new Reuse and Recycling Centre (RRC), a relocated transfer hall and a bulky waste/fuel preparation facility on the site.</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM33	56	8.10 Moved here	<p>Powerday</p> <p>Powerday in Enfield is an existing site currently operating as a Waste Transfer Station. Planning permission was granted for an upgrade to a Materials Recovery Facility (MRF) capable of handling 300,000 tonnes of C&amp;I and C&amp;D waste per annum and the new facility was opened in 2015.</p> <p><b>However, this increase in capacity has not yet happened and it is not clear if the planning permission will be implemented. Therefore this has not been added to the pipeline capacity, however throughput for the site will be monitored and if additional capacity comes online it will be used to close the capacity gap.</b></p>
MM34	56	8.11 Moved here	<p>Loss and re-provision of existing waste management facilities</p> <p>Where existing sites need to be relocated, compensatory capacity is required in order to comply with the London Plan, Borough Local Plans and, <del>once adopted,</del> the NLWP. It is known that some <b>waste sites in North London will be redeveloped for other uses as part of the Brent Cross Cricklewood Regeneration scheme.</b> <del>capacity will be lost during the plan period. Some of this capacity will be replaced within North London, some outside North London with a net loss to North London but not to London as a whole, and some is as yet unknown. Where such issues are known and new sites have already been sought, this information has been fed into the Plan process and</del> <b>This</b> information has been given <b>highlighted</b> in Schedule 1.</p>
MM35	56	8.12 Moved here	<p><del>The North London Boroughs are aware that the regeneration of Brent Cross Cricklewood</del> <b>Regeneration Area</b> redevelopment (BXC) is likely to affect <b>includes four</b> existing waste sites, comprising a NLWA transfer station and three commercial operations. <b>These are BAR3 PB Donoghue, BAR4 Hendon Transfer Station, BAR6 McGovern, and BAR7 Cripps Skips.</b> These sites will be redeveloped under the approved planning permission for the regeneration of Brent Cross Cricklewood (Barnet planning application reference F/04687/13). The Hendon Rail Transfer Station (BAR 4) will be replaced as part of the <del>BXC development</del> with a new facility on <del>site S01-BA</del> to meet the NLWA's requirements; <b>planning permission for a new Waste Transfer Station (WTS) at Geron Way was granted by Barnet Council in September 2018</b></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><b>(Barnet planning application reference 17/6714/EIA)</b>. The existing <b>commercial</b> facilities at BAR 6 and BAR 7 fall within the land required to deliver the <b>early first</b> Southern phase of the BXC regeneration which <b>has commenced</b> is anticipated will commence in early 2018. Replacement capacity for these sites will not be provided prior to their redevelopment and therefore replacement capacity will be sought outside of the BXC regeneration area on alternative sites/ areas to be identified by the London Borough of Barnet by 2025 in line with the planning permission. <b>The BAR3 site is currently identified for redevelopment in Phase 4 of the BXC regeneration. It is planned that capacity at the waste facilities of BAR 4, BAR 6 and BAR 7 and part of the capacity of BAR 3 would be replaced by the new Waste Transfer Station (WTS) delivered as part of the Brent Cross Cricklewood Regeneration. The balance of replacement capacity for BAR3 would need to be identified prior to its redevelopment and the London Borough of Barnet will seek to provide replacement capacity within the borough. The Barnet Local Plan will identify potential sites. For the purposes of the NLWP, therefore, it is assumed there will be no loss of capacity for these facilities.</b></p>
MM36	56	New para after repositioned 8.12	<p><b>Two facilities in Waltham Forest (GBN Services and Pulse Environmental) have closed and their capacity has been replaced in a new facility operated by GBN services in Enfield. While the capacity has moved to a different Borough, there is no loss of capacity for North London as a whole. The new GBN facility is newly built but has been designed with sufficient capacity to replace that lost at the two Waltham Forest facilities and therefore, for the purposes of the plan the capacity of these facilities is assumed to remain the same. The new facility may also be able to provide capacity on top of what has been replaced, and this will be monitored.</b></p>
MM37	42	6.7	<p>Meeting the Capacity Gap</p> <p><b>The capacity gap is the difference between projected waste arisings (Table 5) and existing capacity (Table 6). Table 7 below sets out the capacity gap broken down in to 5 year periods over the NLWP plan period. It takes account of the known changes to capacity over</b></p>

Ref	Page	Policy/ Paragraph	Main Modification																																								
			<p><b>the plan period, including the upgrading and loss of existing facilities.</b> The capacity gap is the difference between tonnage associated with existing and planned waste management capacity (see Table 3 – section 5) and the quantity of waste to be managed over the plan period (see the chosen approach set out above). <b>North London can accommodate recycling, composting, treatment and recovery facilities to manage waste and so additional waste management capacity will be in the 'recycling' and 'recovery' tiers of the waste hierarchy.</b> This method identifies whether there is adequate or surplus capacity, or a requirement for additional facilities. Table 6 sets out the capacity gaps for each management route. Negative figures indicate a capacity gap and therefore the type of management route for which capacity is sought over the plan period. The boxes that are not highlighted denote where 'surplus' capacity exists.</p>																																								
MM38	43	Table 6 renumbered Table 7	<p>[Revised]</p> <p>Table <b>76</b>: Capacity gaps throughout the Plan period (tonnes) –<del>chosen option</del></p> <table border="1"> <thead> <tr> <th>LACW/C&amp;I</th> <th>2020</th> <th>2025</th> <th>2030</th> <th>2035</th> </tr> </thead> <tbody> <tr> <td><b>Projections</b></td> <td><b>7,774,481</b></td> <td><b>1,818,942</b></td> <td><b>1,865,987</b></td> <td><b>1,915,508</b></td> </tr> <tr> <td><b>Existing capacity – recycling/composting</b></td> <td><b>1,076,129</b></td> <td><b>1,076,129</b></td> <td><b>1,076,129</b></td> <td><b>1,076,129</b></td> </tr> <tr> <td><b>Existing and pipeline capacity - recovery</b></td> <td><b>597,134</b></td> <td><b>700,000</b></td> <td><b>700,000</b></td> <td><b>700,000</b></td> </tr> <tr> <td><b>Loss of capacity - composting</b></td> <td>-</td> <td><b>35,200</b></td> <td><b>3 5,200</b></td> <td><b>35,200</b></td> </tr> <tr> <td><b>Capacity Gap</b></td> <td><b>-101,218</b></td> <td><b>-78,013</b></td> <td><b>-125,058</b></td> <td><b>-174,579</b></td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>C&amp;D</th> <th>2020</th> <th>2025</th> <th>2030</th> <th>2035</th> </tr> </thead> <tbody> <tr> <td><b>Projections</b></td> <td><b>457,796</b></td> <td><b>457,746</b></td> <td><b>496,480</b></td> <td><b>517,032</b></td> </tr> </tbody> </table>	LACW/C&I	2020	2025	2030	2035	<b>Projections</b>	<b>7,774,481</b>	<b>1,818,942</b>	<b>1,865,987</b>	<b>1,915,508</b>	<b>Existing capacity – recycling/composting</b>	<b>1,076,129</b>	<b>1,076,129</b>	<b>1,076,129</b>	<b>1,076,129</b>	<b>Existing and pipeline capacity - recovery</b>	<b>597,134</b>	<b>700,000</b>	<b>700,000</b>	<b>700,000</b>	<b>Loss of capacity - composting</b>	-	<b>35,200</b>	<b>3 5,200</b>	<b>35,200</b>	<b>Capacity Gap</b>	<b>-101,218</b>	<b>-78,013</b>	<b>-125,058</b>	<b>-174,579</b>	C&D	2020	2025	2030	2035	<b>Projections</b>	<b>457,796</b>	<b>457,746</b>	<b>496,480</b>	<b>517,032</b>
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Ref	Page	Policy/ Paragraph	Main Modification				
						<b>Existing capacity</b>	<b>633,436</b>
			<b>Additional pipeline capacity</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
			<b>Surplus capacity</b>	<b>+175,640</b>	<b>+156,690</b>	<b>+136,956</b>	<b>+116,404</b>
			<b>Hazardous</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>
			<b>Projections</b>	<b>53,421</b>	<b>53,421</b>	<b>53,421</b>	<b>53,421</b>
			<b>Existing and pipeline capacity</b>	<b>4,252</b>	<b>4,252</b>	<b>4,252</b>	<b>4,252</b>
			<b>Capacity Gap</b>	<b>-49,169</b>	<b>-49,169</b>	<b>-49,169</b>	<b>-49,169</b>
MM39	43	New para after Revised Table 6, now Table 7	<b>To meet the capacity gaps identified in Table 7, the North London Boroughs will seek opportunities for new capacity through intensification of existing sites and/or new facilities. The North London Boroughs contacted existing waste operators to find out if there are any current plans to upgrade or intensify their facilities (see chapter 8 and Policy 1).</b>				
MM40	43	6.8	The capacity gap figures in tonnage of waste have been converted to waste management land requirement using data from evidence gathered and evaluated on typical capacity and land take <b>In order to estimate how much land is required for plan-making purposes, the capacity gap has been converted into a land area requirement based on a typical throughput per hectare for each type of facility. The amount of land required depends on the type of facility and the technology being used. New technologies may come forward during the plan period which have a higher throughput per hectare and so will require less land. The North London Boroughs want to ensure the best use of land in the area and this means maximising the capacity of a site while mitigating any environmental impacts. The land required is indicative only and new capacity will be monitored rather than land. Reference capacities are set out in the table Table 8 below. Table 20 in section 7 of the Data Study Part 2 (20198) available on the website (www.nlwp.net) provides a fuller explanation. Table 9 below sets out the amount of land required within North London to meet the</b>				

Ref	Page	Policy/ Paragraph	Main Modification																						
			capacity gaps identified in Table 7 for the chosen approach of net self-sufficiency for LACW, C&I and C&D waste streams. <b>In order for net self-sufficiency to be achieved by 2026, in line with the London Plan, new capacity will need to be delivered by this date.</b>																						
MM41	44	New Table numbered Table 8	<p><b>Table 8: Reference Capacities for Land Take for New Waste Facilities</b></p> <table border="1"> <thead> <tr> <th>Facility Type</th> <th>Assumed tonnes per hectare</th> </tr> </thead> <tbody> <tr> <td>Energy from waste (large scale)</td> <td>165,000</td> </tr> <tr> <td>Energy from waste (small scale)</td> <td>50,000</td> </tr> <tr> <td>Recycling (C+I &amp; LACW)</td> <td>128,000</td> </tr> <tr> <td>Recycling (C+D)</td> <td>100,000</td> </tr> <tr> <td>Recycling (specialised – eg. Metals)</td> <td>50,000</td> </tr> <tr> <td>Recycling (Hazardous)</td> <td>10,000</td> </tr> <tr> <td>Re-use</td> <td>15,000</td> </tr> <tr> <td>Composting</td> <td>25,000</td> </tr> <tr> <td>Treatment Plant</td> <td>50,000</td> </tr> <tr> <td>Treatment Plant (Hazardous)</td> <td>10,000</td> </tr> </tbody> </table>	Facility Type	Assumed tonnes per hectare	Energy from waste (large scale)	165,000	Energy from waste (small scale)	50,000	Recycling (C+I & LACW)	128,000	Recycling (C+D)	100,000	Recycling (specialised – eg. Metals)	50,000	Recycling (Hazardous)	10,000	Re-use	15,000	Composting	25,000	Treatment Plant	50,000	Treatment Plant (Hazardous)	10,000
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MM42	45	Table 7 revised and renumbered Table 9	<p>[Table 7 revised]</p> <p>Table 79: <b>Indicative</b> land take requirements for meeting the capacity gap net self-sufficiency for LACW, C&amp;I and C&amp;D (requirements for London Plan apportionment in brackets)</p>																						

Ref	Page	Policy/ Paragraph	Main Modification		
			Waste Stream	Management type	Hectares 2026
			C&I/LACW	Recycling	1.5
			Hazardous	Recycling/recovery/ treatment	4.9
			<b>TOTAL land required in North London</b>		<b>6.4</b>
MM43	45	6.10	<p>A capacity gap equivalent to <del>two</del> <b>around 4.9</b> hectares of land has been identified for meeting North London's hazardous waste management need over the plan period, <del>a small requirement of less than 2,500 tonnes per annum has also been identified for recovery of hazardous waste, but this figure is considered too small to plan for.</del> While the North London Boroughs support the provision of hazardous waste facilities in appropriate locations, it is acknowledged that these facilities generally operate for a wider-than-local catchment area due to their specialist nature. The Boroughs will therefore work with the GLA and other boroughs across London to identify and meet a regional need.</p>		
MM44	54	New paragraphs after 8.1	<p><b>At the core of waste planning is the requirement for waste planning authorities to "prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams" (NPPW 3). In particular, waste planning authorities should "identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations" (NPPW 4).</b></p> <p><b>The London Plan (Policy SI8) requires Development Plans to plan for identified need and "allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste". The London Plan also identifies existing waste sites, Strategic Industrial Land (SIL) and Locally Significant Industrial Sites as a focus for new waste capacity.</b></p>		

Ref	Page	Policy/ Paragraph	Main Modification
			<p><b>STRATEGIC OBJECTIVE 2 seeks to ensure there is sufficient suitable land available to meet North London’s waste management needs and reduce the movements of waste through safeguarding existing sites and identifying locations for new waste facilities.</b></p> <p><b>Known opportunities to intensify and upgrade existing facilities have already been taken into account in section 6 and have been incorporated into the calculations for meeting the capacity gap. Where further opportunities to optimise waste management capacity on existing sites arise, this is supported by Policy 1 where the proposal is in line with relevant aims and policies in the North London Waste Plan, the London Plan, Local Plans and related guidance.</b></p> <p><b>North London’s identified waste need and capacity gap is set out in section 6 and summarised in Table 7 above. Additional facilities to meet the capacity gap would require approximately 6.4ha of land, depending on the type of technology used.</b></p>
MM45	54	8.2 [Restructured]	<p>The NLWP identifies a number of <b>North London Boroughs assessed a range of sites and areas</b> to meet future waste needs. Assessment criteria have been developed using waste planning policy and in consultation with key stakeholders in a series of focus groups. <b>This work is set out in the Sites and Areas Report.</b> <del>It was initially intended to also identify sites within the NLWP, i.e. A ‘site’ in this context is an individual plots of land that would be</del> <b>is</b> safeguarded for waste use <b>only</b>. <del>However, only one site was brought forward by landowners during the call for sites exercises and no further sites are required for the management of LACW. As a result, only areas have been identified. An ‘area’ comprises a number of individual plots of land, for example, an industrial estate or employment area that is in principle suitable for waste use but where land is not specifically safeguarded for waste. The NPPW and the draft London Plan endorse the identification of “sites and/or areas” in Local Plans. The approach is also supported by the waste industry and key stakeholder in consultation.</del></p>

Ref	Page	Policy/ Paragraph	Main Modification
MM46	57	8.20	<p><b>When seeking suitable locations for new waste facilities, the Boroughs took into account NPPW paragraph 4 which states that waste planning authorities should “consider a broad range of locations including industrial sites” and “give priority to the re-use of previously developed land [and] sites identified for employment uses”. The London Plan identifies suitable locations in policy SI8 as existing waste sites and SIL/LSIS. Waste facilities are considered to be industrial uses and are therefore considered suitable, in principle, to be developed on any industrial land in North London. However, in preparing the NLWP, the North London Boroughs have sought to refine this approach and direct new waste facilities towards locations assessed and selected as the most suitable in North London which are identified as “Priority Areas” in the Plan.</b> The <del>proposed site and area search</del> criteria used in the NLWP site and area selection process were developed based on the requirements of the <b>National Planning Policy Framework, National Planning Policy for Waste [footnote], Planning Practice Guidance and the London Plan</b> <del>national waste planning policy</del>. Both planning and spatial criteria were discussed with key stakeholders through a focus group session in spring 2014.</p> <p><b>[footnote]</b> Following the introduction of the <b>National Planning Policy for Waste (NPPW)</b> in October 2014 <b>to replace Planning Policy Statement 10</b>, the site and area search criteria were reviewed to ensure compliance with this document.</p>
MM47	58	8.21	<p>An extensive site and area search and selection process has been undertaken. Full details of the site selection exercise are set out in the ‘Sites and Areas Report’ <b>and the ‘Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP’</b> Report available on the NLWP website. In summary it has involved the following key stages:</p> <p>[...]</p> <p><b>x. Following consultation responses on the Draft Plan, a Sites and Areas Options Appraisal was prepared to analyse a number of different approaches for reducing the total quantum of land identified for new waste facilities and creating a better</b></p>

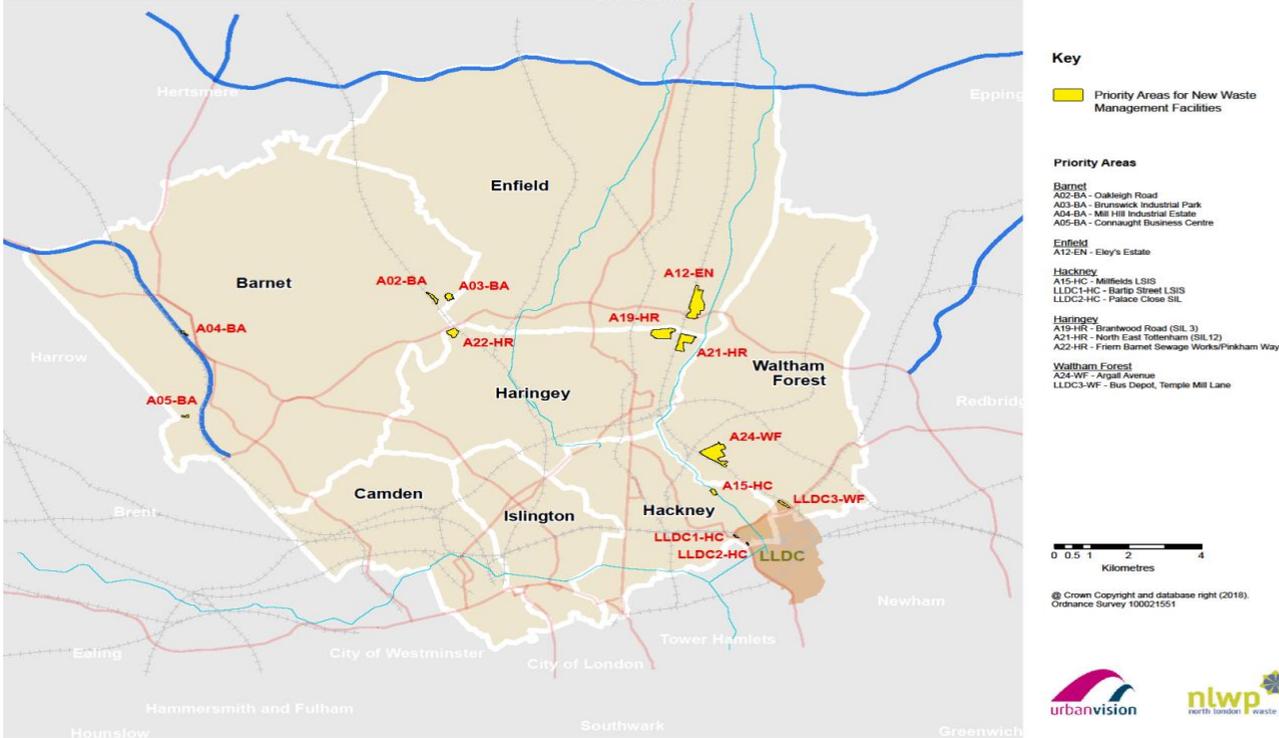
Ref	Page	Policy/ Paragraph	Main Modification
			<b>geographical spread of waste facilities in line with Spatial Principle B. This resulted in the reduction of total land identified for new waste facilities from 351.8ha in the Draft Plan to 102.38ha in the Proposed Submission Plan.</b>
MM48	61	8.24	<p>In preparing this (Proposed Submission) version of the NLWP, and deciding which sites and areas to take forward, the North London Boroughs took into account national and regional policy, the aims of the NLWP and consultation responses on the Draft Plan, including issues raised around deliverability and other constraints. Further work was undertaken to gather and assess additional information on the proposed sites and areas received during the consultation or as a result of new data being published. <b>In order to respond to issues raised during consultation on the suitability of the Draft Plan proposed sites and areas, the North London Boroughs undertook four areas of further work in order to identify which sites and areas should be taken forward:</b></p> <ul style="list-style-type: none"> <li>• <b>Gather and assess additional information on sites/areas</b></li> <li>• <b>Changes to policy wording on reducing the impact of new waste development</b></li> <li>• <b>Seek a better geographical spread of waste facilities</b></li> <li>• <b>Consider options to reduce the amount of land taken forward in the Proposed Submission Plan</b></li> </ul>
MM49	61	New paragraphs after 8.24	<p><b>The additional information gathered and assessed included transport evaluations, potential mitigation measures, updating flood risk information and other environmental factors, consideration of where waste facilities might be best located within an Area, heritage and National Grid assets, and identifying Areas within an Opportunity Area, Housing Zone, Crossrail 2 or Lee Valley Regional Park. This information helped inform amendments to Policy 6, and Area Profiles were updated accordingly with a further assessment of the suitability of the proposed sites and areas undertaken.</b></p> <p><b>In response to comments about the distribution of waste facilities across North London, Spatial Principle B was amended from 'Seek a network of waste sites across North London' to 'Seek a better geographical spread of waste sites across North London,</b></p>

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			<p><b>consistent with the principles of sustainable development'. This change provided the basis for further work on the distribution of Areas taken forward in the Proposed Submission Plan.</b></p>
MM50	61	8.25 [restructured and split]	<p>The North London Boroughs developed a range of reasonable options for taking forward sites and areas in the Proposed Submission version of the plan. Further <b>In considering geographical spread of facilities and reducing the sites and areas to be taken forward in the Proposed Submission Plan, each Borough's current contribution to waste management capacity In North London was calculated. Currently 62% of the total land in existing waste use across North London is located in Enfield. In order to address concerns that there is an over-concentration of waste facilities in Enfield, promote a better geographic spread of waste facilities in North London, and reduce the amount of land taken forward into the Proposed Submission Plan, the Boroughs considered five alternatives with different land options. The details of these options are brought together set out in 'Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP' (Updated 2020)(2018).</b></p> <p><b>The options included and excluded areas based on their performance against qualitative assessment criteria, such as Local Plan designations and performance against suitability rating (banding) as detailed in the Sites and Areas Report. Analysis of each of the five options considered, amongst other issues, the proportion of Enfield's contribution to the Areas identified. One of the options limited the number of Areas for new waste facilities in Enfield to one. The option with the lowest land provided (102ha) combined with the best geographical spread (limiting the land identified in Enfield) has been taken forward into this Plan. In looking to reduce the total amount of land identified as most suitable for new waste uses, the Boroughs did not identify any criterion which would provide a sound basis to reduce the number of areas further than a combined total of 102ha. The other options did not significantly reduce the amount of land identified and/or did not provide a better geographical spread of Areas. The preferred option was to take forward land designated as industrial land and high-performing (Band B) sites/areas, while achieving a better geographical spread by reducing the number of sites amount of land for new waste facilities identified in Enfield. This focus on industrial land and the highest performing areas helps to locate</b></p>

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			waste facilities away from residential properties, as far as this is possible in an urban area like North London.
MM51	61	New after 8.25	<p><b>Following the work described above, all of the individual sites and several of the Areas were removed from Schedules 2 and 3 and in some of the remaining Areas the amount of land considered most suitable for new waste facilities was refined. The NLWP therefore takes an area-based approach to waste planning with no individual sites allocated for new waste facilities. An area-based approach is one which identifies areas which comprise a number of individual plots of land, for example, an industrial estate or employment area, that is in principle suitable for waste use but where land is not specifically safeguarded for waste uses. The identification of Areas allows for flexibility in bringing forward a range of locations across North London, allowing for a better geographic spread of opportunities for future waste development that is consistent with the spatial principles of the plan to meet North London's requirement. However, because the Areas identified are not safeguarded solely for waste use it is important to identify sufficient land to ensure adequate opportunity across North London for waste operators to provide new facilities because there will competition for this land by other industrial users. It should be noted that most waste planning authorities are in the same position and that this approach is supported by both the NPPW and the London Plan.</b></p> <p><b>An update to the Data Study to support the Proposed Submission NLWP reduced the indicative land required to meet the capacity gap from 12ha in the Draft NLWP to 9ha in the Proposed Submission NLWP. This has since reduced further to 6.4ha in light of the Data Study Addendum (2020). For the Plan to provide confidence that sufficient land is available in the right place and at the right time a quantum of land and number of Areas has to be identified.</b></p> <p><b>As identified in the Sites and Areas Report, it is not possible to say precisely how much of North London's industrial land could become available for waste uses over the plan</b></p>

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			<p>period. This depends on the rate at which existing land becomes vacant in the identified Areas and a waste operator being ready and able to locate on that same site. This in turn depends on the wider economic factors. Identifying a range of land suitable for new waste facilities responds to the NPPW expectation that waste planning authorities “should identify sufficient opportunities to meet the identified needs of their area”. This also provides flexibility for waste operators and should sites not become available in one particular Area, or if an Area changes over the plan period to become unsuitable for waste uses, this approach will ensure there are alternative land options available.</p> <p>The work set out in the ‘Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP’ resulted in reducing the total amount of land identified as most suitable for new waste facilities from 351.8 in the Draft Plan to 102.38ha in the Proposed Submission Plan. While 102ha is a large area when compared to the need for 6.4ha, this land is currently occupied by existing industrial uses. There is strong competition for industrial land in North London and this is reflected by low vacancy rates (an average of 4.8%). The Boroughs will rely on business churn for release of individual sites which could come forward for waste uses. The most recent analysis of business churn in London suggests that around 20% of land could be released in this way. Analysis of business churn and vacancy rates is included in the Sites and Areas Report. To provide 6.4ha, 6% of the Priority Areas would need to be developed for waste management to meet the capacity gap, if no additional capacity is provided on existing sites. It should be noted that 6.4ha of land is indicative only and throughput on a site will depend on the operational technology used. New capacity to meet North London’s needs will be monitored rather than land take.</p> <p>The preferred approach limits the areas proposed for new waste facilities in Enfield to one industrial area and although this option is considered the most appropriate to take forward in the NLWP, there is a risk that the identified Area in Enfield (comprising 26ha) could accommodate all new waste capacity, which would not respect Spatial Principle B or generally encourage a sustainable distribution. There is also a possibility that applications could come forward for new waste facilities on other industrial land in</p>

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			<p><b>Enfield. To address this, the 'Options Appraisal for Sites and Areas to be taken forward in the Proposed Submission NLWP' recommends a 'Priority Areas' sequential approach to ensure developers consider siting a facility within the Areas listed in Schedules 2 and 3 before other locations. In addition, developers should seek sites in Priority Areas outside Enfield before considering sites in Enfield. This recommendation has been taken forward in Policy 2: Priority Areas for New Waste Management Facilities and Policy 3: Windfall Sites.</b></p>
MM52	61	8.26	<p>The <b>Priority Areas</b> areas, shown in Figure 13 (see also Schedules 2 and 3 in section 9), have been identified as <b>the most</b> suitable for built waste management facilities. The <b>Priority Areas</b> areas are being put forward as they comply with the NLWP Spatial <b>Principles</b> Framework which is reflected in the site <b>and area</b> selection criteria, as well as a range of environmental, social and economic criteria set out in the Sustainability Appraisal Scoping Report. <b>In the absence of the identification of individual sites, the Priority Areas represent sufficient opportunities to deliver the identified waste management needs of North London over the plan period.</b> <del>During the course of the plan, it is expected that land will become available as part of the business churn.</del> <b>In order to ensure that Priority Areas are the focus for new waste capacity, the location of new waste facilities and any compensatory capacity will be monitored through Monitoring Indicator IN3. The aim of the indicator is to check that sites in Priority Areas are being taken up as anticipated and also monitor if land within Schedules 1, 2 and 3 is not available or suitable for new waste facilities. The later aspect in particular will enable the Boroughs and developers to understand where sufficient land remains available and the geographic distribution of new waste facilities, which will inform potential site searches and evidence required by the Boroughs for those seeking planning consent for sites for waste uses. The monitoring will help to demonstrate the progress of the spatial principle for better geographical spread and achievement of the sequential approach to delivery of new waste sites set out in Policies 2 and 3.</b> Any proposals for waste facilities within the <b>Priority Areas</b> areas will be subject to planning permission. <del>No provision is made for landfill due to the inability of the Plan area to accommodate development of landfill.</del></p>

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MM53	63	Figure 10	<p><b>Figure 110: Priority Areas for new waste management facilities</b> Location of proposed new areas</p> 
MM54	47	7.2	<p><b>Most of North London’s waste capacity need is met through its existing facilities. These existing facilities are safeguarded through London Plan policy, however they are not always in the most sustainable locations. The NLWP seeks to make the most of the existing infrastructure by supporting intensification of existing sites, where appropriate, while enabling relocation to more sustainable locations for replacement capacity (see Policy 1). Existing capacity and additional new capacity will be needed to meet North London’s identified need for waste management over the plan period (2020-2035). The Boroughs are</b></p>

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			<p><b>seeking a sustainable network of waste facilities which helps reduce movements of waste, including waste exports and increase opportunities for waste to be managed in proximity to its source.</b> Existing waste capacity in North London is safeguarded and set out in Schedule 1 (see Policy 1 and Appendix 1) and land <b>Priority Areas</b> for new waste facilities is set out in Schedules 2 and 3 (see Policy 3). <b>The Priority Areas for new waste capacity represent the most suitable land when assessed against the Spatial Principles, including a better geographical spread, and the assessment criteria detailed in the previous chapter. This helps to deliver STRATEGIC OBJECTIVE 2 which seeks to ensure there is sufficient suitable land available to meet North London’s waste management needs.</b> The focus for new waste capacity in North London is for recycling and recovery facilities to manage the quantities of waste set out in Table 58, thereby reducing exports. <b>New waste facilities will be assessed against the criteria in Policy 5.</b></p>
MM55	48	7.4	<p>The North London Boroughs will monitor the NLWP against the <b>projected</b> quantities of waste <b>generated</b> set out in Table 5, <b>(IN1), new waste management capacity delivered (IN2), the locations of new waste facilities and compensatory capacity (IN3) and the amount of waste exported (IN7)</b> to ensure the <u>strategic over-arching</u> policy is being delivered. <b>All</b> monitoring indicators are set out in Section 10 of this plan.</p>
MM56	49	7.8	<p>Local Authority Collected Waste (LACW) and Commercial and Industrial (C&amp;I) waste streams comprise similar types of waste. <b>Most facilities which manage these waste streams do not differentiate between them and so it is reasonable to group them together when assessing existing capacity and planning for additional capacity.</b> The NLWP identifies sufficient land to manage the equivalent of all LACW and C&amp;I waste arising in North London by 2026.</p>
MM57	49	New after 7.8	<p><b>There is a capacity gap of up to around 174,500 tonnes for LACW and C&amp;I waste over the plan period. This equates to approximately 1.5 hectares of land, depending on the technology of the facility/ies. This calculation includes the increase in EfW capacity and the loss of composting capacity at Edmonton EcoPark.</b></p>

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MM58	49	7.9	The North London Waste Authority (NLWA) <del>and seven constituent boroughs are</del> is seeking to achieve a household waste recycling target of 50% by 2020 consistent with the targets set out in the <del>required to prepare a</del> North London Joint Waste Strategy (JWS) for North London. <b>The most recent JWS came to an end in December 2020. A key element of that strategy has been met through the granting of permission for a replacement energy recovery facility at the Edmonton EcoPark to treat residual waste. A replacement JWS will be developed by NLWA in conjunction with the seven constituent boroughs, but requires a clear position on the circular economy and recycling from central government; it is hoped that this will be within the next year. The new Joint Waste Strategy will focus on activities to move all waste up the waste hierarchy. In the short term, a Residual Waste Reduction Plan has been agreed after consultation with constituent boroughs. This Plan forms a short-term strategic approach from NLWA, which will inform the development of the next Joint Waste Strategy. The NLWA expect a new JWS will be being developed in 2021 and 2022. A new JWS will set out how North London will contribute to the Mayor's recycling targets as set out in the London Plan and London Environment Strategy.</b>
MM59	50	7.10	There is a need for additional capacity for recycling for <del>both the LACW/ and C&amp;I waste streams throughout the plan period. As</del> <b>LACW and C&amp;I are combined for the purposes of waste planning</b> as many facilities can manage both waste streams, <del>the need for recycling is combined.</del>
MM60	50	New after 7.11	<b>There is an opportunity to bring forward new LACW waste recycling/composting capacity on the Friern Barnet Pinkham Way site which is owned by the North London Waste Authority, although presently there are no plans to do so. There are also opportunities to bring forward commercial recycling capacity in all but one of the Priority Areas identified in Schedules 2 and 3, and composting capacity on four of the Priority Areas. Additional capacity and recycling rates will be monitored by Monitoring Indicator IN1 and reported in the Annual Monitoring Report.</b>
MM61	50	New after 7.14	<b>There are opportunities for additional recovery capacity to be brought forward on three of the proposed Priority Areas.</b>

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MM62	50	New after 7.15	<b>Many waste transfer facilities also recycle some of the waste they receive. There is opportunity for waste transfer facilities to come forward on nine of the Priority Areas.</b>
MM63	51	7.19	<p><u>Recycling</u></p> <p>The NLWP will identify sufficient land to manage the equivalent of all <b>North London has sufficient capacity to manage</b> Construction and Demolition (C&amp;D) waste arising in North London <b>over the plan period.</b> <del>by 2035, while acknowledging that s</del>Some exports of excavation waste will continue, but opportunities <b>to manage as much of this waste stream as practicable within North London will be sought.</b> <del>particularly for Excavation waste. At least 95% of excavation waste exports will be put to beneficial use</del></p>
MM64	51	7.20	The majority of C&D waste is recycled on site or through transfer facilities. Each Borough Local Plan has a sustainable design and construction policy in place which seeks to minimise waste generated during the design and construction of development and re-use or recycling of materials on-site where possible. <b>Recycling rates will be monitored by Monitoring Indicator IN1 and reported in the Annual Monitoring Report.</b>
MM65	51	7.23	<p><u>Landfill</u></p> <p>North London has no landfill sites and depends on capacity outside the NLWP area. <del>Some</del> <b>A reduced amount</b> of the CD&amp;E waste stream, <del>particularly excavation waste,</del> will continue to be exported to landfill <b>but the majority (95%) of C&amp;D waste will be reused, recycled and recovered and the majority of excavation waste (95%) will be put to beneficial use.</b> <del>unless opportunities materialise to re-use it locally. It is anticipated that C&amp;D waste exports to landfill will reduce over the plan period while excavation waste exports will increase in line with growth.</del></p>
MM66	52	7.26	<u>Recycling and Recovery</u>

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			<p>North London has <b>a number of facilities which manage</b> one hazardous waste treatment facility <b>alongside other non- hazardous waste. The majority of these are</b> include <b>vehicle depollution</b> (car breakers) and metal recycling sites <del>WEEE sites</del>. <b>There are also transfer facilities</b> as well as <b>such as</b> RRCs which will accept <b>some hazardous waste</b>, for example, paints and batteries which require specialist treatment and disposal. Such sites will continue to make a valuable contribution to managing North London's hazardous waste requirements. <b>The amount of hazardous waste managed in North London varies from year to year</b> with a <b>maximum</b> capacity of around <b>4,250</b> <del>3,600</del> tonnes <b>over the last five years.</b> <del>per annum and two recycling facilities; one for metals and one for end-of life vehicles handling around 2,500 tonnes per annum between them.</del> In addition, other facilities permitted to manage hazardous waste</p>
MM67	52	7.27	<p>There is a capacity gap for the recovery <b>management</b> of around <b>49,000</b> <del>2,500</del> tonnes per annum, this is considered too small a figure to plan for provision of a new facility and as such a specific land requirement is not identified for this management option. There is a requirement for recycling of around <del>17,000 tonnes per annum</del>, requiring an estimated <b>4.92</b>ha of land. The North London Boroughs support the provision of such facilities in <b>principle in the Priority Areas</b> appropriate locations and will work with the GLA and other Boroughs across London to meet this need. It is noted in the sites and area profiles in Appendix 2 of the NLWP where a <del>site or area</del> <b>Priority Area</b> is not suitable for hazardous waste recycling and recovery facilities. Any applications for hazardous waste facilities in North London that do come forward will be considered on a case by case basis. However, in the short term it is likely that hazardous waste will continue to be exported to the most appropriate specialist facilities.</p>
MM68	64	Policy 1	<p>Policy 1: Existing waste management sites</p> <p>All existing waste management sites identified in <i>Schedule 1: Existing safeguarded waste sites in North London</i>, and any other sites that are given planning permission for waste use, are safeguarded for waste use.</p>

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			<p>Expansion or intensification of operations at existing waste sites will be <del>supported</del> <b>permitted</b> where the proposal is in line with relevant aims and policies in the North London Waste Plan, the London Plan, Local Plans and related guidance.</p> <p>Applications for non-waste uses on safeguarded waste sites will only be permitted where it is clearly demonstrated <b>by the developer</b> to the satisfaction of the relevant borough that compensatory capacity will be delivered in line with the Spatial <b>Principles Framework</b> on a suitable replacement site in North London that must at least meet, and, if possible, exceed, the maximum achievable throughput of the site proposed to be lost and help to promote the increased geographical spread of waste sites across the plan area.</p> <p><del>Development proposals in close proximity to existing safeguarded waste sites or sites allocated for waste use which would prevent or prejudice the use of these</del> <b>existing waste</b> sites for waste purposes will be resisted under the agent of change principle unless design standards or other suitable mitigation measures are adopted to ensure that the amenity of any new residents would not be significantly adversely impacted by the continuation of waste use at that location or suitable compensatory provision has been made for the waste use elsewhere within the Plan area.</p> <p>This policy helps meet strategic objectives SO2 and SO3</p> <p>This policy contributes towards Spatial <b>Principles Framework</b> components A and C</p>
MM69	65	9.4	<p>The purpose of Policy 1 is to ensure that the existing waste capacity in North London is protected and is able to expand where appropriate. It applies to sites with existing operational waste facilities, and any other sites developed for waste use throughout the plan period. <b>The safeguarding of waste sites for waste use does not preclude waste operators from moving and selling their site as a waste site.</b></p>

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MM70	65	9.6	<b>Some existing waste sites may have the potential to increase their capacity, or provide additional waste services; p</b> Planning applications for expansion of existing waste facilities <b>such changes</b> will be supported <b>permitted</b> where they are in alignment with policies in this Plan and with Borough Local Plans.
MM71	65	9.7	If, for any reason, an existing waste site is to be lost to non-waste use, compensatory <b>waste capacity provision</b> will be required within North London. <b>Compensatory capacity must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost. When assessing the throughput of a site, the maximum throughput achieved over the last five years should be used.</b> Replacement provision will be calculated using the maximum achievable throughput (tonnes per annum) that the site has achieved as set out in the EA Waste Data Interrogator. Maximum throughput for existing sites 2009-2016 can be found in the Data Study Part 3: Sites Schedule Report Tables 1-7: Assessment of existing waste management capacity. This information is sourced from the Environment Agency's Waste Data Interrogator. <b>It is the responsibility of the developer to demonstrate that replacement capacity has been provided. Where this information is not available, for example if a waste site has been vacant for a number of years, the potential capacity of the site should be calculated using an appropriate and evidenced throughput per hectare.</b> Applicants will need to demonstrate that provision of replacement capacity is secured before permission is granted for an alternative use. This could be through a compensatory site of a suitable size to meet at least the maximum annual throughput or an increase of capacity in an existing facility. <b>Boroughs may consider using conditions or s106 agreements to satisfy themselves that compensatory capacity will be delivered.</b> However, it may not be necessary for replacement sites to be on a 'like for like' basis, for example, a new site with a larger capacity might replace a number of sites with individually smaller, but combined equivalent, capacity.
MM72	66	9.8 [divided in two]	Compensatory provision should be delivered in accordance with the Spatial <b>Principles</b> Framework and such proposals will need to demonstrate compliance with <b>Policy 2 (Priority Areas for new waste management facilities)</b> , Policy 3 (Windfall sites) and <b>Policy 5</b> (Assessment Criteria for waste management facilities and related development) of the NLWP. The area of search for a replacement site <b>Compensatory capacity</b> should be <b>provided</b> within North London <b>unless the</b>

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			<p><b>NLWP Monitoring Report demonstrates that waste capacity in North London is sufficient to meet net self-sufficiency for LACW, C&amp;I and C&amp;D waste, including hazardous waste (Table 6). If sufficient capacity has been achieved in North London, compensatory capacity should be provided elsewhere in London. If it can be demonstrated that there is sufficient capacity in London to meet London's apportionment and net self-sufficiency targets, it may be possible to justify the release of waste sites for other uses. During the Plan period, where waste sites shown in Schedule 1 are redeveloped for other uses, the amount and location of compensatory provision will be noted in the NLWP AMR (see IN2 in section 10). Sites which are going to be redeveloped for other uses during the plan period are identified in Schedule 1 and should be excluded from the search criteria for potential sites for new or replacement waste facilities.</b></p> <p>[Begin new para]</p> <p>As set out within Section 4, a key Spatial Principle of the NLWP is to establish a geographical spread of waste sites across North London, consistent with the principles of sustainable development. The aim is to ensure that waste is managed efficiently and as close to its source as possible whilst minimising any negative cumulative impacts resulting from a high concentration of waste facilities. Avoiding an unduly high concentration of waste facilities in a location is consistent with the overarching objectives of sustainable development, identified within the NPPF and would leave land available for other uses. <b>Policy 2 identifies the Priority Areas for new waste management facilities and a sequential approach to site selection.</b> The most suitable location for the re-provision of a site lost to non-waste development may therefore not necessarily be within the same north London borough as the displaced site. Adequate evidence of compensatory provision will be required to the satisfaction of the local planning authority before planning permission for redevelopment proposing loss of a facility is granted.</p>
MM73	66	9.9	Any sites that come forward and receive planning permission for waste development which are implemented in the lifetime of the NLWP will be regarded as existing waste sites in North London and safeguarded under the provisions of this Policy (1). <b>As part of the monitoring of the plan,</b>

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			<p>waste arisings (IN1) the tonnage of waste capacity available by management type and type of wastes handled (IN2) and the loss of existing waste capacity and provision of replacement capacity (IN4), will be monitored (see section 10). The most up-to-date list of existing waste management sites will be found in the NLWP AMR. Where existing waste sites are lost, but compensatory provision has been made to the satisfaction of the Borough, this will be noted in the AMR. In time the safeguarded designation will be removed from the relevant Borough's policies map.</p>
MM74	66	9.10	<p>[...]</p> <p>The NPPF and the draft London Plan sets out the 'Agent of Change' principle. This principle places the responsibility of mitigating the noise impact <b>of noise, dust, vibration and other nuisance-generating activities</b> (from existing noise-generating businesses) on the proposed new development. Developers proposing non-waste development in close proximity to existing waste sites should be aware of the potential impacts on existing waste operations and plan this into their development so as not to prevent or prejudice the continued waste use in that location, otherwise such developments will not be permitted. Accordingly proposed non-waste developments should be designed to protect both the amenity of potential new residential developments and the existing waste operation within that area.</p>
MM75	67	New after 9.10	<p><b>Some existing waste sites may be having an adverse impact on surrounding uses such as schools and residential areas. The waste operator is responsible for ensuring that its regulated facility does not cause pollution of the environment and harm to human health. The operator's performance in relation to that responsibility is assessed by checking compliance with the terms and conditions of the permit. Environmental permits are issued by either the Environment Agency for large-scale facilities and those with greater risk to the environment (known as "A1 installations") or the local authority for smaller-scale facilities with lower risk to the environment (which include "A2 installations" and "Part B installations"). Local authorities hold a register of these permits which are available to view on request.</b></p>

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			<p>The responsibility for checking compliance falls to the issuer of the permit (the regulator). The Environmental Permitting Regulations (EPR) place a duty on regulators to undertake appropriate periodic inspections of regulated facilities. The EPR are the basis for any enforcement action and the principal offences are:</p> <ul style="list-style-type: none"> <li>● operating a regulated facility without a permit;</li> <li>● causing or knowingly permitting a water discharge activity or groundwater activity without a permit; and</li> <li>● failing to comply with a permit condition, flood risk activity emergency works notice, flood risk remediation notice or an enforcement-related notice.</li> </ul> <p>Operator competence can be considered by the regulator at any time, whether as part of the determination of an application or at any time during the life of the permit. The regulator can suspend or revoke the permit if an operator fails to comply with the conditions of the permit, risking harm to the environment or human health. The North London Boroughs will monitor any enforcement action taken against waste operators (IN6) to ensure that existing waste facilities do not cause harm to the environment or local communities. This will be published as part of the NLWP Annual Monitoring Report. Any additional information on enforcement action can be requested from the regulator.</p>
MM76	67	Policy 2	<p>Policy 2: <b>Priority Areas</b> for new waste management facilities</p> <p>Areas listed in <i>Schedule 2: Areas suitable <b>Priority Areas</b> for waste management</i> and <i>Schedule 3: Areas <b>Priority Areas</b> identified in LLDC Local Plan</i> are identified as suitable for built waste management facilities <b>to meet the identified need set out in Tables 5 and 7.</b></p> <p><b>To help meet the spatial principle to create a better geographical spread of waste facilities in North London, developers should first seek sites in Priority Areas outside Enfield, and must demonstrate that no sites are available or suitable before considering sites within Enfield’s Priority Area.</b></p>

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			<p>Applications for waste management development will be permitted on suitable land within the areas <b>Priority Areas</b> identified in Schedule 2 subject to other policies in the North London Waste Plan, the London Plan and Local Plans, and related guidance.</p> <p>Development proposals will need to manage waste as far up the waste hierarchy as practicable. <b>Development proposals for materials and waste management sites are encouraged where they deliver a range of complementary waste management and secondary material processing facilities on a single site.</b></p> <p>Applications for waste management development within the areas <b>Priority Areas</b> identified in Schedule 3 will be assessed by the London Legacy Development Corporation.</p> <p>This policy helps meet strategic objectives SO1, SO2, SO3 and SO5</p> <p>This policy contributes towards Spatial <b>Principles</b> Framework components B, C and E F</p>																																													
MM77	67	Schedules 2 and 3	<p>Table 11: Schedule 2 Areas suitable <b>Priority Areas</b> for waste management</p> <table border="1" data-bbox="658 1046 1588 1361"> <thead> <tr> <th data-bbox="658 1046 779 1158">Area ref</th> <th data-bbox="779 1046 1039 1158">Area Name</th> <th data-bbox="1039 1046 1155 1158">Size Area (ha)</th> <th data-bbox="1155 1046 1303 1158">Borough</th> <th colspan="5" data-bbox="1303 1046 1588 1118">Waste Facility Type</th> </tr> <tr> <td colspan="4"></td> <th data-bbox="1303 1118 1361 1158">A</th> <th data-bbox="1361 1118 1420 1158">B</th> <th data-bbox="1420 1118 1478 1158">C</th> <th data-bbox="1478 1118 1536 1158">D</th> <th data-bbox="1536 1118 1588 1158">E</th> </tr> </thead> <tbody> <tr> <td data-bbox="658 1158 779 1225">A02-BA</td> <td data-bbox="779 1158 1039 1225">Oakleigh Road</td> <td data-bbox="1039 1158 1155 1225">0.99</td> <td data-bbox="1155 1158 1303 1225">Barnet</td> <td data-bbox="1303 1158 1361 1225">X</td> <td data-bbox="1361 1158 1420 1225"></td> <td data-bbox="1420 1158 1478 1225">X</td> <td data-bbox="1478 1158 1536 1225"></td> <td data-bbox="1536 1158 1588 1225">X</td> </tr> <tr> <td data-bbox="658 1225 779 1292">A03-BA</td> <td data-bbox="779 1225 1039 1292">Brunswick Industrial Park</td> <td data-bbox="1039 1225 1155 1292">3.9</td> <td data-bbox="1155 1225 1303 1292">Barnet</td> <td data-bbox="1303 1225 1361 1292">X</td> <td data-bbox="1361 1225 1420 1292"></td> <td data-bbox="1420 1225 1478 1292"></td> <td data-bbox="1478 1225 1536 1292"></td> <td data-bbox="1536 1225 1588 1292">X</td> </tr> <tr> <td data-bbox="658 1292 779 1361">A04-BA</td> <td data-bbox="779 1292 1039 1361">Mill Hill Industrial Estate</td> <td data-bbox="1039 1292 1155 1361">0.9</td> <td data-bbox="1155 1292 1303 1361">Barnet</td> <td data-bbox="1303 1292 1361 1361">X</td> <td data-bbox="1361 1292 1420 1361"></td> <td data-bbox="1420 1292 1478 1361"></td> <td data-bbox="1478 1292 1536 1361"></td> <td data-bbox="1536 1292 1588 1361">X</td> </tr> </tbody> </table>	Area ref	Area Name	Size Area (ha)	Borough	Waste Facility Type									A	B	C	D	E	A02-BA	Oakleigh Road	0.99	Barnet	X		X		X	A03-BA	Brunswick Industrial Park	3.9	Barnet	X				X	A04-BA	Mill Hill Industrial Estate	0.9	Barnet	X				X
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A04-BA	Mill Hill Industrial Estate	0.9	Barnet	X				X																																								

Ref	Page	Policy/ Paragraph	Main Modification							
A05-BA			Connaught Business Centre	0.9	Barnet	X				X
A12-EN			Eley's Estate	26.1	Enfield	X	X	X	X	X
A15-HC			Millfields LSIS	1.48	Hackney			✖		<b>X</b>
A19-HR			Brantwood Road	16.9	Haringey	X			X	X
A21-HR			North East Tottenham	15.32	Haringey	X			X	X
A22-HR			Friern Barnet Sewage Works/Pinkham Way	5.95	Haringey	X	X			X
A24-WF			Argall Avenue	26.91	Waltham Forest	X	X			X

Table 12: Schedule 3 Areas **Priority Areas** identified in LLDC Local Plan

Area ref	Area Name	Size Area (ha)	Borough	Waste Facility Type				
				A	B	C	D	E
LLDC1-HC	Bartrip Street	0.6	Hackney	X				X
LLDC2-HC	Chapman Road (Palace Close)	0.33	Hackney	X				X
LLDC3-WF	Temple Mill Lane	2.1	Waltham Forest	X	X			X

Table 13: Key to Waste management Facility Type

Facility type

Ref	Page	Policy/ Paragraph	Main Modification	
			A	Recycling
			B	Composting (including indoor / in-vessel composting)
			C	Integrated resource recovery facilities / resource parks
			D	Waste recovery or treatment facility (including thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment)
			E	Waste transfer
MM78	68	9.11 [rearranged]	<p>National and European requirements state that waste plans must identify locations where future waste development may take place. In addition, the London Plan requires boroughs to allocate sufficient land to provide capacity to manage apportioned waste. Policy 2 identifies areas <b>Priority Areas for new waste facilities</b> and their suitability for a range of built waste management facilities. <b>These Priority Areas have been assessed against national, regional and local criteria, including the Strategic Objectives and Spatial Principles, and represent the most suitable areas for new waste facilities in North London. To help redress the high proportion of North London's waste facilities already in Enfield (62%), and help deliver a better geographical spread of sites (Spatial Principle B), developers wishing to provide additional waste capacity on a new site in North London are required to demonstrate that no land is available or suitable in Priority Areas outside of Enfield before considering the Priority Area identified within the Borough. This applies to additional capacity only and not to the expansion or intensification of existing waste sites or providing compensatory capacity for sites already in Enfield. The exception to this sequential approach to site search is for Recycling and Reuse Centres (RRCs) where there is an identified need in Enfield and Barnet to improve the coverage across North London (see Policy 4). The evidence will need to demonstrate an adequate search has been undertaken which takes into account the type of waste facility proposed, the criteria set out in Table 10 and the criteria set out in policy 6.</b></p>	
MM79	68	9.13	<p><b>In Schedules 2 and 3, the NLWP identifies thirteen</b> <del>several</del> <b>Priority Areas</b> to provide land suitable for the development of waste management facilities, <b>including RRCs (see Policy 4)</b>. Each <del>'area'</del> <b>Priority Area</b> comprises a number of individual plots of land, for example, an industrial estate or employment area that is in principle suitable for waste use <del>but where land is not safeguarded for waste</del>. The identification of areas <b>Priority Areas</b> suitable for waste uses,</p>	

Ref	Page	Policy/ Paragraph	Main Modification
			subject to detailed site assessment at planning application stage, will help to achieve net self-sufficiency whilst encouraging co-location of facilities and complementary activities (an objective of the NPPW and Spatial <b>Principle C</b> Framework). <b>Areas listed in Schedule 2: Areas Priority Areas</b> listed in <i>Schedule 2: Areas suitable Priority Areas</i> for waste management and <i>Schedule 3: Areas Priority Areas</i> identified in LLDC Local Plan <b>suitable for waste management and Schedule 3: Areas identified in LLDC Local Plan suitable for new waste facilities will be identified in borough policies maps, and any new waste sites will be safeguarded and identified in borough policies maps.</b>
MM80	68	9.14	The areas <b>Priority Areas</b> are considered to be in the most suitable, sustainable and deliverable locations in North London for new waste management facilities when assessed against a range of environmental, economic and social factors ( <b>see STRATEGIC OBJECTIVE 5</b> ) and the Spatial <b>Principles</b> Framework. <b>The location of new waste facilities and compensatory capacity will be monitored through Monitoring Indicator IN3.</b>
MM81	69	9.15	The site <b>Area</b> profiles in Appendix 2 <b>are provided to assist developers who wish to build a waste facility in North London. The Profiles</b> indicate the size of each area <b>Priority Areas</b> , the type of facility likely to be accommodated on the area, <b>constraints</b> , and any mitigation measures which may be required. Developers should be aware that any type of facility listed as potentially suitable is subject to consideration against the full suite of relevant local planning policies/guidance.
MM82	69	9.16	The ability of areas <b>Priority Areas</b> to accommodate a range of types and sizes of waste management facility is important to the flexibility of the Waste Plan. Table 13: Key to Waste Management Facility Types contains a full list of the types of facilities which were considered when assessing sites <b>Areas</b> and which may be required over the plan period to meet the identified capacity gap <b>and to provide new sites for compensatory capacity.</b> The facility types identified are broad categories which may come forward over the plan period. The order of facility types reflects their place in the waste hierarchy, with categories A and B at the 'recycling' level and C-E at the 'other recovery' level. Applicants should take account of this order when

Ref	Page	Policy/ Paragraph	Main Modification
			responding to the second criteria of Policy 2 which requires development proposals to manage waste as far up the waste hierarchy as practicable <b>in line with STRATEGIC OBJECTIVE 1.</b>
MM83	70	Policy 3	<p>Policy 3: Windfall Sites</p> <p>Applications for waste development on windfall sites outside of the <b>existing</b> sites and areas <b>Priority Areas for new waste management facilities</b> identified in Schedules 1,2 and 3 will be permitted provided that the proposal can demonstrate that:</p> <p>a) the sites and areas <b>Priority Areas</b> identified in Schedules 1, 2 and 3 are not available or suitable for the proposed use or the proposed site would be better suited to meeting the identified need having regard to the Spatial Principles;</p> <p><b>New) sites have first been sought outside Enfield before sites within Enfield were considered, and that no sites outside Enfield are available or suitable, in line with Spatial Principle B;</b></p> <p>b) the proposed site meets the criteria for built facilities used in the site selection process (see Table 10 of Section 8 of the NLWP) the proposal fits within the NLWP Spatial <b>Principles Framework</b>, and contributes to the delivery of the NLWP aim and objectives;</p> <p>[...]</p> <p>This policy contributes towards Spatial Framework <b>Principles</b> components B and C</p>
MM84	71	9.23	<p>Developers of windfall sites are required to demonstrate why <b>it is not possible to use, expand or intensify an existing waste site set out in Schedule 1 or why</b> the sites and in the areas <b>Priority Areas</b> in Schedules 1, 2 and 3 are not available or suitable. <b>In addition, to help address concerns that there is a high proportion of North London's waste facilities already in Enfield, and help deliver a better geographical spread of sites (Spatial Principle B), developers are required to demonstrate that no sites are available or suitable outside of Enfield before considering those within the Borough. The exception</b></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><b>to this is for Recycling and Reuse Centres (RRCs) where there is an identified need in Enfield and Barnet to improve the coverage across North London (see Policy 4). The evidence will need to demonstrate an adequate search has been undertaken which takes into account the type of waste facility proposed, the criteria set out in Table 10 and the criteria set out in policy 6.</b></p> <p>[split paragraph]</p> <p><b>Developers proposing waste sites outside the Priority Areas will be expected to demonstrate</b> <del>or</del> that the proposed site would be better suited to meeting the identified need <b>for North London</b> having regard to <b>delivering</b> the Spatial Principles of the NLWP. <b>For example, a windfall site may deliver a better geographic spread of facilities in North London (Spatial Principle B), or there may be an opportunity to co-locate a recycling facility with a reprocessing plant (Spatial Principle C) or an opportunity for small scale expansion of an existing site onto adjacent land which helps facilitate the maximum use of an existing waste site and enable co-location of facilities.</b> There may be instances in the future where advances in waste technologies are such that <b>existing sites or Priority Areas</b> the identified sites/areas do not meet the technical requirements of a proposed waste management facility, for example, the identified locations might be too small for the proposed development or the facility may need to be located near a specific waste producer or user of heat. Some of the areas <b>Priority Areas</b> identified in Policy 2 may become unavailable over the Plan period because they will be used for other purposes or affected by future development proposals such as Crossrail 2 and Opportunity Areas. Locating certain types of waste processing sites within large scale redevelopment areas may also have benefits for reducing need for waste transport especially during the construction phase for the management of CDE. In addition, it is also recognised that proposals on windfall site may come forward to provide capacity for displaced facilities from within the plan area where existing capacity needs to be re-provided locally and this need cannot be met through the existing allocations</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM85	71	9.24	Proposals for waste development on windfall sites will be supported where the proposal would not compromise existing planning designations and where the impacts on communities and environment can be satisfactorily controlled. <del>This</del> <b>In proposing a windfall site, developers will need to demonstrate that the spatial principles set out in chapter 4 have been considered, and in particular should not work against that the proposed site can deliver the spatial principle of balanced geographical distribution of waste facilities across North London, taking into account the concentration of existing waste sites in Enfield with reference to the NLWP Annual Monitoring Report</b> as set out in the Spatial Framework.
MM86	73	Policy 4	<p><b>Policy 4 – Re-use &amp; Recycling Centres</b></p> <p>Proposals for Re-use &amp; Recycling Centres will be permitted where:</p> <ul style="list-style-type: none"> <li>a) They <b>improve the coverage of centres across the North London Boroughs, in particular</b> are sited in an area of identified need for new facilities in Barnet or Enfield or elsewhere <del>where they improve the coverage of centres across the North London Boroughs, and;</del></li> <li>b) They are in line with relevant aims and policies in the North London Waste Plan, London Plan, Local Plans and other related guidance.</li> </ul> <p>This policy helps meet strategic objectives SO1, SO2 and SO3</p> <p>This policy contributes towards Spatial Framework <b>Principles</b> components <b>A and B</b></p>
MM87	74	9.33	Re-use & Recycling Centres should be located where they can provide appropriate access for members of the public and for contractors and their vehicles. They are best sited on former waste sites or in areas of industrial or employment land and need to be of a sufficient size for the range and quantity of materials likely to be received. Sites within areas identified in Schedules <b>1, 2 and 3</b> <del>Areas suitable for waste management</del> are likely to be <b>the most suitable locations, and Policy</b>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><b>3: Windfall Sites will apply to any application for a RRC outside of these areas.</b> There may be scope to provide localised recycling centres as part of major new development.</p>
MM88	74	Policy 5	<p>Policy 5: Assessment Criteria for waste management facilities and related development Applications for waste management facilities and related development, including those replacing or expanding existing sites, will be required to demonstrate to the satisfaction of the relevant Borough that:</p> <p><b>New after a) the proposal maximises the waste management capacity of the site</b></p> <p>c) the facility will be enclosed unless justification can be provided by the developer <del>as to why that is not necessary</del> <b>that an equivalent level of protection can be permanently achieved by other means.</b></p> <p>f) there is no significant adverse impact on <del>the historic environment (heritage assets and their settings, and undesignated remains within Archaeological Priority Areas),</del> open spaces or land in recreational use or landscape character of the area including the Lee Valley Regional Park;</p> <p><b>New after f) heritage assets and their settings are conserved and where appropriate enhanced;</b></p> <p>i) the development <b>avoids increasing the levels of vulnerability to climate change, makes appropriate adaptation and mitigation measures to achieve this, and helps</b></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><b>reduce greenhouse gas emissions</b> <del>makes the fullest possible contribution to climate change adaptation and mitigation</del></p> <p>m) <del>appropriate permits are held or have been applied for from the Environment Agency</del></p> <p>This policy helps meet strategic objectives SO4, SO5, SO7 and SO8</p> <p>This policy contributes towards Spatial Framework <b>Principles</b> component <b>C, E and F</b></p>
MM89	75	9.34	<p>Policy 5 seeks to ensure that the construction and operation of waste facilities does not give rise to an unacceptable impact <b>on health</b>, or harm the amenity of local residents or the environment. Amenity is defined as any element providing positive attributes to the local area and its residents and impacts can include such issues as, <b>but not limited to, increased levels of local air pollution</b>, increased noise disturbance, light impacts including increased light or reduced light or sunlight, reduced privacy, loss of outlook and reduced visual amenity. Applicants will need to demonstrate that appropriate measures <b>and/or Best Available Techniques (BAT) (where applicable)</b> have been taken to minimise any potential impacts from the proposed waste development to ensure the protection of local amenity <b>and health</b>. The specific requirements will vary from site to site, however issues to be addressed may include strict hours of operation, effective cladding on buildings to prevent noise pollution, and dust and odour suppression systems as appropriate. These issues are discussed in more detail below. <b>Policy 5 helps deliver a number of the STRATEGIC OBJECTIVES, including SO4 which seeks high standards of design, SO5 which seeks to integrate social, environmental and economic considerations, SO6 which seeks a low carbon economy, SO7 which supports the use of sustainable forms of transport, and SO8 which seeks to protect the natural environment, biodiversity, cultural and historic environment.</b></p>
MM90	75	New para after 9.34	<p><b>London Plan policy SI8 promotes capacity increases at waste sites and where appropriate to maximise their use. In order to demonstrate that North London's land is being used to its highest potential, developers are required to provide evidence that the</b></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<b>waste management capacity on a site has been optimised. This could be in reference to similar facilities operating to a high standard.</b>
MM91	77	9.37	The supporting documents should set out how landscape proposals can be incorporated as an integral part of the overall development of the site and how the development contributes to the quality of the wider urban environment. The applicant will need to demonstrate that there will be no significant adverse effect on areas or features of landscape, historic or nature conservation value. Where relevant, <b>applications for waste management facilities and related development will be required to demonstrate that they conserve and where appropriate enhance heritage assets and their settings, including consideration of non-designated archaeology where relevant</b> the delivery of waste facilities (through construction to operation) should take account of the need to conserve and enhance the historic environment in line with the NPPF.
MM92	78	9.40	Waste and recyclables require transportation at various stages of their collection and management and so opportunities to employ more sustainable options such as rail and river should be fully considered. <b>STRATEGIC OBJECTIVE 7 supports the use of sustainable forms of transport and minimise the impacts of waste movements including on climate change.</b> North London is characterised by heavy traffic on all principal roads. That is why developers need to prioritise non-road forms of transport if at all possible and to set out their assessment of <b>sustainable transport options</b> in a Transport Assessment detailing transport issues to be submitted with any planning applications for waste facilities (see below). In North London there exists considerable potential for sustainable transport of waste as part of the waste management process. There are a number of railway lines and navigable waterways in North London including the Regents Canal and the Lee Navigation. It is existing practice to transport waste by train and pilot projects have taken place to transport waste by water. Developers are required to demonstrate that they have considered the potential to use water and rail to transport waste before reliance on transport of waste by road. Where the site lies adjacent to a wharf or waterway, capable of transporting waste, developers need to demonstrate that consideration has been given to the provision and/or enhancement of wharf facilities. <b>This will be monitored through Monitoring Indicator IN5 (see Chapter 10). Waste transfer activities that do</b>

Ref	Page	Policy/ Paragraph	Main Modification
			<b>take advantage of rail and or boat transportation must also ensure that they design their site and meet the standards required by all waste management sites stated in this Plan.</b>
MM93	78	9.41	Applicants will need to submit a Transport Assessment in line with the relevant borough Local Plan policy and the London Plan. The Transport for London Best Practice Guide contains advice on preparing Transport Assessments when they are required to be submitted with planning applications for major developments in London. Consideration should be given to access arrangements, safety and health hazards for other road users, the capacity of local and strategic road networks, impacts on existing highway conditions in terms of traffic congestion and parking, on-site vehicle manoeuvring, parking and loading/unloading areas, and queuing of vehicles. The <b>Assessment</b> statement should include a traffic management plan establishing the times of access for vehicles to minimise disruption on the local road network during peak hours, and setting out specific routes to ensure that vehicles are accessing the site via roads considered suitable by the Highways Authority and, where possible, avoid overlooking of the site access by residential properties. <b>The Assessment should cover the types of vehicles to be used, including opportunities to use ultra-low and zero emission vehicles, alternatives to vehicles powered by the internal combustion engine, and the provision of any infrastructure at future or expanded waste sites to accommodate this. The statement should also cover emission standards and fuel types in line with national and regional air quality standards.</b>
MM94	79	9.43	The development of Servicing and Delivery Plans and Construction Logistic Plans (CLP) will be encouraged for all waste developments. Such Plans ensure that developments provide for safe, <b>efficient</b> and legal delivery and collection, construction and servicing including minimising the risk of collision with vulnerable road users such as cyclists and pedestrians. Consideration should be given to the use of Direct Vision Lorries for all waste vehicles <b>in line with the Mayor's Vision Zero Action Plan</b> , and the use of freight operators who can demonstrate their commitment to TfL's Freight Operator Recognition Scheme (FORS) or similar. <b>Developers need to demonstrate that they can operate servicing and deliveries in the most efficient way that makes best use of transport movements that are made.</b>

Ref	Page	Policy/ Paragraph	Main Modification
MM95	79	9.44	<del>Waste developments should be</del> <b>Criteria 5j seeks</b> designed to protect and enhance local <b>biodiversity. Development proposals will be assessed against this policy as well as other relevant principles and policies set out in the NPPF and Borough Local Plans.</b> [...]
MM96	81	9.48	The North London Strategic Flood Risk Assessment (SFRA) and individual borough 'Level 2' SFRAs have demonstrated the <b>current</b> risks from <b>flooding</b> from various <b>all</b> sources <b>of flood risk</b> across North London and site specific flooding assessments have been undertaken on <b>Priority Areas</b> <del>new sites/areas</del> in schedules 2 and 3. Where a site is near or adjacent to areas of flood risk, the development is expected to contribute through design to a reduction in flood risk, <b>making as much use as possible of natural flood management techniques, and be appropriately flood resistant and resilient</b> in line with the <b>NPPF and NPPG. Development proposals will be required to assess the impact of climate change using the latest published climate change allowances, and mitigate to the appropriate future flooding scenario using these allowances. A sequential approach to the layout of the site should be taken aiming to locate development in the parts of the site at lowest risk of flooding from any source.</b> Waste facilities are often characterised by large areas of hardstanding for vehicles and large roof areas. Development proposals will be required to show that flood risk would not be increased as part of the scheme and, where possible, will be reduced overall through the use of Sustainable Drainage Systems (SuDS) and other techniques. Any proposed development should be reviewed by the Environment Agency at an early stage to discuss the reduction of flood risk on the site.
MM97	83	Policy 6	Policy 6: Energy Recovery and Decentralised Energy  Where waste cannot be managed at a higher level in the waste hierarchy and <del>recovery of energy from waste is feasible</del> , waste developments <b>are required to</b> <del>should</del> generate energy, and/or recover excess heat ( <del>including the recovery of energy from gas</del> ) and provide a supply to networks including decentralised energy networks <b>unless it is not technically feasible or economically</b>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><b>viable to do so. Developers must demonstrate how they meet these requirements as part of a submitted Energy Statement.</b></p> <p>Where there is no available decentralised energy network and no network is planned within range of the development, as a minimum requirement the proposal should recover energy through electricity production and be designed to enable it to deliver heat and/or energy and connect to a Decentralised Energy Network in the future.</p> <p><del>Developers must demonstrate how they meet these requirements, or provide evidence if it is not technically feasible or economically viable to achieve them, as part of a submitted Energy Statement.</del></p> <p>This policy helps meet strategic objectives SO1 and SO6</p> <p>This policy contributes towards Spatial Framework <b>Principles</b> component D</p>
MM98	84	9.61	<p>Work is already underway to progress the delivery of a decentralised network in the Lee Valley known as <b>Meridian Water</b> the Lee Valley Heat Network (LVHN). The LVHN <b>Meridian Water</b> will capture affordable low carbon heat from waste to energy facilities and combined heat and power plants, supplying it to buildings and industry across the Lee Valley. <b>Meridian Water</b> The LVHN is requesting hot water to be supplied for the energy from waste facility (EfW) at Edmonton EcoPark. However, over time, the network will connect additional heat sources, including other waste developments, elsewhere in the Lee Valley. <b>Any future development, including the current plan for Meridian Water should ensure that the openness and permanence of the Green Belt is maintained in accordance with draft New London Plan Policy G2.</b></p>
MM99	84	Policy 7	<p>Proposals for the provision of new facilities for the management, treatment and disposal of wastewater and sewage sludge will be permitted, provided that:</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<ul style="list-style-type: none"> <li>• it is demonstrated that there is an identified need for such a facility within the North London Waste Plan Area, which cannot be met through existing waste facilities; and</li> <li>• the proposals meet the other policies of this North London Waste Plan together with all other relevant policies of the appropriate borough's Development Plan, <del>and meet environmental standards set by the Environment Agency.</del></li> </ul> <p>This policy helps meet strategic objectives SO1, SO2 and SO5</p> <p>This policy contributes towards Spatial Framework <b>Principles</b> component <b>A and B</b></p>
MM100	86	Policy 8	<p>Policy 8: <del>Control of Inert Waste</del></p> <p><b>Inert waste should be managed as far up the waste hierarchy as possible, including on-site recycling and reuse of such material.</b></p> <p>Proposals for development using inert waste will be permitted where the proposal is <b>for beneficial use, including but not limited to:</b> <del>both essential for, and involves the minimum quantity of waste necessary for:</del></p> <ul style="list-style-type: none"> <li>a) <del>The purposes of r</del> <b>R</b>estoring former mineral working sites; or</li> <li>b) Facilitating an improvement in the quality of land; or</li> <li>c) Facilitating the establishment of an appropriate use in line with other policies in the Local Plan; or</li> </ul>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>d) Improving land damaged or degraded as a result of existing uses and where no other satisfactory means exist to secure the necessary improvement.</p> <p><del>Where one or more of the above criteria (a-d) are met, a</del> <b>All</b> proposals using inert waste should:</p> <p>a) Incorporate finished levels that are compatible with the surrounding landscape. The finished levels should be the minimum required to ensure satisfactory restoration of the land for an agreed after-use; and</p> <p>b) Include proposals for high quality restoration and aftercare of the site, taking account of the opportunities for enhancing the overall quality of the environment and the wider benefits that the site may offer, including biodiversity enhancement, geological conservation and increased public accessibility.</p> <p>Proposals for inert waste disposal to land will not be permitted if it can be demonstrated that the waste can be managed through recovery operations <del>and that there is a need to dispose of waste.</del></p> <p>This policy helps meet strategic objectives SO1, SO2 and SO3</p> <p>This policy contributes towards Spatial Framework <b>Principle</b> component B</p>
MM101	87	9.68	<p>Inert waste materials <b>can be an important resource</b> and should be used for beneficial purposes, such as the restoration of mineral sites and in engineering works, or at other 'exempt sites' rather than disposed of at inert landfill sites. <b>A definition of 'beneficial uses' can be found in the new London Plan.</b> Increased use of recycled and secondary aggregates can reduce the need and demand for primary aggregates extraction. <b>Sites and operators will need to conform to the 'Aggregates from inert waste Quality Protocol' document to achieve 'end of waste' status. If this cannot be achieved and/or the operator cannot prove compliance with the protocol, then the material will not have achieved 'end of waste' status and will still be considered a waste and subject to controlled waste legislation. There is no 'end of</b></p>

Ref	Page	Policy/ Paragraph	Main Modification											
			<b>waste' criteria for soil so this will always be viewed as a waste once it has become a controlled waste outside of the Definition of Waste Code of Practice.</b>											
MM102	88	10.3	Responsibility for monitoring lies with the individual boroughs. <b>However, the boroughs have agreed to monitor the Plan jointly through a lead borough arrangement.</b> Data will be collated by each borough and included in a joint NLWP their Authority Monitoring Report, which is produced annually <b>which will be produced annually.</b>											
MM103	90	10.6 Table 14	<table border="1"> <thead> <tr> <th></th> <th>Indicator</th> <th>Target(s)</th> <th>What it monitors</th> <th>What it monitors</th> </tr> </thead> <tbody> <tr> <td><b>IN1</b></td> <td><b>Waste arisings (Table 6) by waste stream and management route</b>  5. Total quantity of waste arisings managed by waste stream (LACW, C&amp;I and CD&amp;E) and management route (recycling/composting, recovery and disposal)  11. Number of developments permitted which include disposal of inert waste to land</td> <td><b>Waste arisings and management in line with forecasts in Table 6 (Baseline Table 3)</b>  In line with Table 8 in Section 7 and the Data Study  To ensure that inert waste is managed in line with the waste hierarchy</td> <td>Strategic Aim (capacity supply and self-sufficiency) Strategic Aim (move waste up Waste Hierarchy) SO1 (resource efficiency) SO3 (net self-sufficiency)  Meeting Future Requirements as specified in the NLWP  % waste diverted and % landfilled</td> <td><b>To check that the NLWP is planning for the right amount of waste</b>  Waste Policy and London Plan targets  Ensure the NLWP delivers a net self-sufficient waste management outcome for the principal waste streams  To ensure that proposals involving the importation and disposal of inert waste to land are achieving in line with waste hierarchy.</td> </tr> </tbody> </table>			Indicator	Target(s)	What it monitors	What it monitors	<b>IN1</b>	<b>Waste arisings (Table 6) by waste stream and management route</b>  5. Total quantity of waste arisings managed by waste stream (LACW, C&I and CD&E) and management route (recycling/composting, recovery and disposal)  11. Number of developments permitted which include disposal of inert waste to land	<b>Waste arisings and management in line with forecasts in Table 6 (Baseline Table 3)</b>  In line with Table 8 in Section 7 and the Data Study  To ensure that inert waste is managed in line with the waste hierarchy	Strategic Aim (capacity supply and self-sufficiency) Strategic Aim (move waste up Waste Hierarchy) SO1 (resource efficiency) SO3 (net self-sufficiency)  Meeting Future Requirements as specified in the NLWP  % waste diverted and % landfilled	<b>To check that the NLWP is planning for the right amount of waste</b>  Waste Policy and London Plan targets  Ensure the NLWP delivers a net self-sufficient waste management outcome for the principal waste streams  To ensure that proposals involving the importation and disposal of inert waste to land are achieving in line with waste hierarchy.
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Ref	Page	Policy/ Paragraph	Main Modification			
			<p><b>IN2</b></p> <p><b>Waste management capacity (Table 8) by waste stream and management route, including existing capacity, new capacity, loss of capacity, compensatory capacity and capacity gaps</b></p> <p>3. Tonnage of waste capacity, including new waste capacity available by management type (recycling/composting, recovery and disposal) and type of wastes handled (LACW, C&amp;I and CD&amp;E)</p> <p>4. Loss of existing waste capacity and provision of replacement capacity</p>	<p><b>Capacity to meet net self-sufficiency targets in Tables 6 and 8</b></p> <p>Zero loss of capacity</p> <p>Replacement locally, within the Borough, North London or London</p> <p>Replacement capacity for Brent Cross Cricklewood provided within Barnet</p> <p>Capacity sufficient to manage capacity requirements as set out in Table 6 Capacity Gaps. New waste facilities in line with Table 7: land take requirements</p>	<p>Strategic Aim (capacity supply and self-sufficiency) Strategic Aim (move waste up Waste Hierarchy) SO1 (resource efficiency) SO3 (net self-sufficiency) Meeting Future Requirements as specified in the NLWP Policy 2: Area allocations Policy 3: Unallocated sites Policy 4. Reuse and Recycling Centres Policy 7 Waste Water Treatment Works and Sewage Plant Policy 8 Control of Inert Waste</p>	<p><b>To check that capacity is increasing to meet net self-sufficiency targets</b></p> <p><u>Ensure sufficient capacity of the right type is available throughout the plan period</u></p> <p>Ensure that capacity is replaced locally <b>unless net self-sufficiency has been met</b> valid planning reasons are provided for not doing so.</p>
			<p><b>IN3</b></p> <p><b>Location of new waste facilities and</b></p>	<p><b>Land within Schedules 1, 2, 3</b></p>	<p>SO2 (capacity provision) <b>Policy 1: Existing waste management sites</b></p>	<p>To check that identified sites and areas are being taken up as anticipated.</p>

Ref	Page	Policy/ Paragraph	Main Modification				
				<p><b>compensatory capacity</b></p> <p>1. Amount of Land within identified areas or on windfall sites brought forward for waste use during the plan period.</p>	<p>In line with Table 7: landtake requirements</p> <p>SO2 (capacity provision) <b>Policy 1: Existing waste management sites</b></p> <p>Policy 2: Area allocations Policy 3: Unallocated sites</p>	<p>Policy 2: Area allocations Policy 3: Unallocated sites</p>	<p><b>To monitor if land within Schedules 1, 2 and 3 is not available or suitable for new waste facilities.</b></p>
			<b>IN4</b>	<p>2. Sites in Schedule 1 and Areas in Schedules 2 and 3 lost to other non-industrial uses through a major regeneration scheme or designated for non-industrial uses in a review of the London Plan or Local Plan</p>	<p>Less than 25% of land lost</p> <p>If 50% of land is lost this will trigger review of plan</p>	<p>SO2 (capacity provision) Policy 2: Area allocations</p>	<p>To check that identified land is sufficient to deliver the plan's aims To ensure sufficient existing capacity remains for managing the levels of waste expected across North London over the plan period as set out in Table 8.</p>
			<b>IN5</b>	<p><b>The number of sites consented that offer non-road transport options, the number of those sites where such options have been implemented and the total tonnage</b></p>	<p><b>Facilities where non-road forms of transport are used to move waste and recycling</b></p>	<p><b>SO5 (sustainability) SO7 (sustainable transport)</b></p>	<p><b>Reduce impact on climate change Improve amenity</b></p>

Ref	Page	Policy/ Paragraph	Main Modification					
				transported through non-road options (where known).				
			<b>IN6</b>	<p><b>Enforcement action taken against waste sites by the local authority and/or Environment Agency on breach of planning conditions or environmental permit</b></p> <p>7. Number of approvals for new waste facilities which meet legislative requirements</p>	<p><b>Zero</b></p> <p>±00%</p>	<p>SO5 (sustainability) SO8 (protect the environment) Spatial <b>Principles</b> framework (Reduce impact on amenity) Policy 5: Assessment Criteria for waste management facilities and related development</p>	<p><b>To ensure sites do not cause harm to the environment or local communities</b></p> <p>Avoid impact on sensitive receptors or maximise scope for effective mitigation</p>	
			<b>IN7</b>	<p>6. Amount of waste <b>imported and exported to landfill</b> by waste stream <b>and management route</b> (LACW, C&amp;I and CD&amp;E)</p>	<p>Exported waste to landfill in line with Table 69 of the NLWP <b>Reduction in waste exports</b></p>	<p>Net self-sufficiency <b>Changes to imports and exports</b></p>	<p>Waste exports are in line with those estimated in the NLWP and through the duty to co-operate</p>	
			<b>IN8</b>	<p>8. Number of new CHP facilities serving district heat networks in which the principal</p>	<p>Monitor only</p>	<p>Strategic Aim (green London)</p>	<p>Monitor only</p>	

Ref	Page	Policy/ Paragraph	Main Modification								
				fuel source is residual waste or recovered waste fuel							
			<b>IN9</b>	9- Sufficient infrastructure in place for management of waste water	Monitor only – information to be obtained from Thames Water	Strategic Aim (capacity supply and self-sufficiency) SO5 (sustainability)	To ensure that Thames Water have sufficient capacity to management the levels of waste water generated in North London over the plan period				
MM104		Table 15	Table 15: Roles and responsibilities involved in implementing the Plan								
			<b>Organisation</b>			<b>Role</b>		<b>Responsibilities</b>			
			Local planning authorities (including London Legacy Development Corporation)			Apply Plan policies		Assessing suitability of applications against Plan policies and priorities Deliver the strategic objectives and policies of the NLWP alongside wider development and regeneration objectives			
						Regulate / monitor		Inspect operating waste sites periodically		<p><b>Appoint a lead borough to monitor the plan and carry out the duty to co-operate when required</b></p> <p><b>Publish annual monitoring reports in the NLWP</b></p> <p>Monitor Plan performance annually</p>	
						Performance delivery		Support / promote waste reduction initiatives through the planning system			

Ref	Page	Policy/ Paragraph	Main Modification										
MM105a		Schedule 1	Table 1: Schedule 1: Existing safeguarded waste sites in North London										
			Site ID	Site Name	Site Address	Waste Stream	Managed Waste	2012	2013	2014	2015	2016	Borough
			BAR1	Winters Haulage, Oakleigh Road South	British Rai Sidings, Oakleigh Road South, Southgate, London N11 1HJ	C&I / CDE	X	10,495	38,503	40,409	35,379	0	
			BAR2	Scratchwood Quarry	London Gateway Service Area, M1 Motorway, Mill Hill, London NW7 3HU	CDE	✓	52,835	71,064	99,060	102,527	131,505	Barnet
			BAR3 ♦	P B Donoghue, Claremont Rd	3 Shannon Close, Claremont Rd, Cricklewood, London NW2 1RR	CDE	✓ (95%)	0	118,964	112,449	112,487	111,226	Barnet

Ref	Page	Policy/ Paragraph	Main Modification										
			BAR 4◆	WRG, Hendon Rail Transfer Station	<b>Hendon Rail Transfer Station, Brent Terrace, Hendon, London NW2 1LN</b>	LACW	X	153,952	164,129	114,457	128,605	142,107	Barnet
			BAR 5	Summers Lane Reuse and Recycling Centre	<b>Civic Amenity &amp; Waste Recycling Centre, Summers Lane, London N12 0RF</b>	LACW	X	15,612	16,361	17,206	10,584	18,237	Barnet
			BAR 6◆	McGovern Brothers, Brent Terrace, Hendon	<b>26-27 Brent Terrace, Claremont Industrial Estate, Hendon, London NW2 1BG</b>	C&I / CDE	X	78,488	76,609	78,855	106,206	102,373	Barnet
			BAR 7◆	Cripps Skips, Brent Terrace	<b>Nightingale Works, Brent Terrace, Claremont Way Industrial Estate, London NW2 1LR</b>	C&I / CDE	X	9,726	7,719	8,807	9,408	8,910	Barnet
			BAR 8	Apex Car Breakers, Mill Hill	<b>Ellesmere Avenue, Mill Hill, London NW7 3HB</b>	C&I		182	162	227	256	243	Barnet

Ref	Page	Policy/ Paragraph	Main Modification												
			BAR 9	<b>Vacant (previously Railway Arches, Hendon Savecase Ltd)</b>	<b>Railway Arches, Colindeep Lane, Hendon, London NW9 6HD</b>	<b>C&amp;I</b>	<b>N/A</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>Barnet</b>
			BAR 10	GBN Services Ltd, New Southgate	<b>Land/Prem ises at Oakleigh Road South, Friern Barnet, London N11 1HJ</b>	<b>CDE</b>	<b>✓  (72%)</b>	<b>14,596</b>	<b>29,938</b>	<b>29,456</b>	<b>31,274</b>	<b>10,746</b>			<b>Barnet</b>
			BAR 11	Upside Railway Yard	<b>Upside Railway Yard, Brent Terrace, Cricklewo d, London NW2 1LN</b>	<b>CDE</b>	<b>X</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>234,930</b>		<b>Barnet</b>
			CAM 1	Regis Road Reuse and Recycling Centre	<b>Regis Road, Kentish Town, London NW5 3EW</b>	<b>LACW</b>	<b>X</b>	<b>-</b>	<b>2,535</b>	<b>5,409</b>	<b>5,595</b>	<b>5,119</b>			<b>Camden</b>
			ENF 1	Crews Hill Transfer Station	<b>Kingswood Nursery, Theobalds Park road, Crews Hill, Enfield, Middlesex EN2 9BH</b>	<b>C&amp;I</b>	<b>X</b>	<b>17,466</b>	<b>17,124</b>	<b>19,231</b>	<b>19,507</b>	<b>18,427</b>			<b>Enfield</b>
			ENF 2	Barrowell Green Recycling Centre	<b>Barrowell Green, Winchmore Hill,</b>	<b>LACW</b>	<b>X</b>	<b>10,715</b>	<b>14,556</b>	<b>13,837</b>	<b>11,541</b>	<b>16,923</b>			<b>Enfield</b>

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					<b>London N21 3AU</b>							
ENF 3		Pressbay Mpotors Ltd, Motor Salvage Complex	<b>Motor Salvage Complex, Mollison Avenue, Brimsdown, Enfield Middlesex EN3 7NJ</b>	<b>C&amp;I</b>	✓	<b>63</b>	<b>63</b>	<b>26</b>	<b>29</b>	<b>37</b>	Enfield	
ENF 4		Chase Farm Hospital, The Ridgeway (SITA)									Enfield	
ENF 5		Jute Lane, Brimsdown	<b>Greenwood House, Jute Lane, Brimsdown, Enfield, Middlesex EN3 7PJ</b>	<b>LACW</b>	✓ <b>(76%)</b>	<b>16,115</b>	<b>11,732</b>	<b>12,659</b>	<b>10,125</b>	<b>15,410</b>	Enfield	
ENF 6		<b>AMI Waste (Tuglord Enterprises ) Stacey Avenue</b>	<b>17 Stacey Avenue, Edmonton, London N18 3PP</b>	<b>C&amp;I / CDE</b>	X	<b>16,855</b>	<b>27,043</b>	<b>28,566</b>	<b>23,004</b>	<b>21,974</b>	Enfield	
ENF 7		<b>Vacant (formerly Budds Skips), The Market Compound, Harbert Road</b>	<b>The Market Compound, 2 Harbert Road, Edmonton, London N18 2HQ</b>	<b>C&amp;I / CDE</b>	-	<b>834</b>	<b>802</b>	<b>1,778</b>	<b>0</b>	<b>0</b>	Enfield	
ENF 8		Biffa Edmonton <b>(AKA Greenstar Environme</b>	<b>Atlas at Aztec 406, 12 Adra Road, Off Meridian</b>	<b>LACW / C&amp;I</b>	✓ <b>(84%)</b>	<b>231,771</b>	<b>72,530</b>	<b>271,888</b>	<b>276,855</b>	<b>270,106</b>	Enfield	

Ref	Page	Policy/ Paragraph	Main Modification												
				ntal), Adfa Road, Edmonton	Way, Enfield, London N9 0BD										
			ENF 9	Hunt Skips, Commercial Road, Edmonton	Rear of 160 Bridport Road, Commercial Road, Edmonton, London N18 1SY	C&I / CDE	✓	9,935	-✓	20,359	-	8,719	Enfield		
			ENF 10	Rooke & Co Ltd, Edmonton	Montague Road Industrial Estate, 22- 26 First Avenue, Edmonton, London N18 3PH	C&I	✓	32,249	24,867	28,095	25,235	3,897	Enfield		
			ENF 11	Edmonton Bio Diesel Plant (Pure Fuels)	Unit A8 Hasting wood Trading Estate, Harbet Road, London N18 3HT	C&I	✓	512	738	895	1,251	-	Enfield		
			ENF 12	Camden Plant, Lower Hall Lane, Chingford	Camden Plant, Lower Hall Lane, Chingford,	CDE	✓	236,950	232,590	241,900	216,334	206,806	Enfield		
			ENF 13	Personnel Hygiene Services Ltd, Princes Road, Upper Edmonton	10 Prices Road, Edmonton, London N18 3PR	C&I	X	0	0	95	1,004	1,081	Enfield		

Ref	Page	Policy/ Paragraph	Main Modification											
			ENF 14	Vacant (Formerly Lee valley Motors Ltd)	Second Avenue, Edmonton	C&I	N/A	0	0	0	0	0		
			ENF 15	Yard 10-12 Hastingwood Trading Estate. A&A Skip Hire Limited	Yard 10-12, Hastingwood Trading Estate, Harbet Road, Edmonton, London N18 3HR	C&I	✓  (89%)	0	0	9,391	16,277	10,696	Enfield	
			ENF 17	Albert Works, Kenninghall Road, Edmonton	Albert Works, Kenninghall Road, Edmonton, London N18 2PD	C&I	✓	193,308	224,020	233,225	211,424	-	Enfield	
			ENF 18	Edmonton Energy from Waste Facility	Edmonton Ecopark, Advent Way, Edmonton, London N18 3AG	LACW	✓	546,402	526,829	560,685	550,408	597,134		
				London Energy Ltd Composting	Edmonton Ecopark, Advent Way, Edmonton, London N18 3AG	LACW	✓	32,498	32,779	35,241	32,475	33,981		
				London Energy Bulk Waste Recycling Facility	Edmonton Ecopark, Advent Way, Edmonton,	LACW	X	192,907	190,333	168,121	152,227	198,389		

Ref	Page	Policy/ Paragraph	Main Modification										
					<b>London N18 3AG</b>								
			Ballast Phoenix Ltd	<b>Edmonton Ecopark, Advent Way, Edmonton, London N18 3AG</b>	<b>LACW</b>	✓	<b>58,255</b>	<b>106,341</b>	<b>112,419</b>	<b>109,141</b>	<b>101,189</b>		
			ENF 19	London Waste Ltd Composting, Edmonton EcoPark, Advent Way									Enfield
			ENF 20	London Waste Bulk Waste Recycling Facility, Edmonton EcoPark, Advent Way									Enfield
			ENF 20	London Waste Ltd, Edmonton EcoPark, Advent Way									Enfield
			ENF 22	London Waste Ltd, Edmonton EcoPark, Advent Way									Enfield
			ENF 23	J O'Doherty Haulage, Noble Road, Edmonton	<b>Pegamoid Site, Noble Road, Edmonton, London N18 3BH</b>	<b>C&amp;I</b>	✓  (59%)	<b>85,103</b>	<b>69,124</b>	<b>64,897</b>	<b>77,305</b>	<b>88,636</b>	Enfield

Ref	Page	Policy/ Paragraph	Main Modification									
ENF 24			Oakwood Plant Ltd, Edmonton	<b>Oakwood House, Nobel Road, Eley Industrial Estate, Edmonton, London N18 3BH</b>	C&I / CDE	✓  (84%)	10,282	7,495	10,011	13,489	14,428	Enfield
ENF 25			Environcom Ltd <b>(Edmonton Facility);</b> Stonehill Business Park, Edmonton	<b>Unit 8a Towpath Road, Stonehill Business Park, N18 3QU</b>	Hazardous (WEEE)	✓	2,447	1,327	9,194	11,040	67	Enfield
ENF 26			Powderday Plant Ltd, Jeffreys Road	<b>Unit 2, Jeffreys Road, Brimsdown, Enfield, Middlesex EN3 7UA</b>	C&I / CDE	✓	27,319	18,664	48,851	23,490	49,754	Enfield
ENF 27			Edmonton EFW									Enfield
ENF 30			<b>Hunsdon Skip Hire (Previously L&amp;M Skips and London &amp; Metropolitan Recycling)</b>	<b>Unit 1, 1b Towpath Road, Stonehill Business Park, London N18 3QX</b>	C&I / CDE	✓	0	7,150	26,545	15,501	11,337	
ENF 31			Volker Highways Ltd	<b>15 Edison Road, Brimsdown Industrial Estate,</b>	C&I / CDE	✓	-	8,892	13,652	7,344	-	

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					<b>Enfield EN3 7BY</b>										
ENF 32		Guy Lodge Farm													Enfield
ENF 33		Ballast Phoenix Ltd													Enfield
ENF 34		London & Metropolitan Recycling Facility													Enfield
ENF 35		<b>Redcorn (ELV)</b> Unit 25 Enfield Metal Kingswood Nursery, Theobalds Park Road	<b>22a &amp; 24 Stacey Avenue, Montague Industrial estate, Enfield N18 3PS</b>	<b>Hazardous (C&amp;I)</b>	✓	-	-	-	-	-			<b>6,557</b>		Enfield
ENF 36		Greenstar Environmental													Enfield
ENF 37		GBN	<b>Gibbs Road, Montague Industrial Estate, London N18 3PU</b>	<b>CDE</b>	✓										
HAC 1		Millfields Waste Transfer & Recycling Facility	<b>Millfields Recycling Facility, Millfields Road, Hackney, London E5 0AR</b>	<b>LACW</b>	<b>X</b>	<b>18,202</b>	<b>13,935</b>	<b>14,173</b>	<b>16,785</b>	<b>16,725</b>					Hackney
HAC 2		Downs Road Service Station (Bryden Motor)	<b>1A Downs Road, Clapton,</b>	<b>C&amp;I</b>	✓	<b>177</b>	<b>175</b>	<b>96</b>	<b>101</b>	<b>-</b>					Hackney

Ref	Page	Policy/ Paragraph	Main Modification												
				Company (Clapton)	<b>London E5 8QJ</b>										
HAR 1/2				<u>Hornsey Central Depot, Haringey LBC</u>											Haringey
HAR 3				<b>Biffa Waste Services Ltd, Garman Road, Tottenham</b>	<b>81 Garman Road, Tottenham, London N17 0UN</b>	<b>C&amp;I</b>	✓	<b>28,851</b>	<b>30,355</b>	<b>34,690</b>	<b>33,704</b>	<b>37,454</b>			Haringey
HAR 4				O'Donovan, Markfield Road, Tottenham	<b>100a Markfield Road, Tottenham, London N15 4QF</b>	<b>C&amp;I / CDE</b>	✓  (50%)	<b>6,316</b>	<b>10,099</b>	<b>11,143</b>	<b>7,035</b>	<b>14,693</b>			Haringey
HAR 5				Redcorn Ltd, White Hart Lane, Tottenham	<b>44 White Hart Lane, Tottenham, London N17 8DP</b>	<b>C&amp;I</b>	✓	<b>15,712</b>	<b>22,733</b>	<b>23,852</b>	<b>8,508</b>	-			Haringey
HAR 6				Restore Community Projects, Ashley Road, Tottenham	<b>Unit 18, Ashley Road, Tottenham, London N17 9LJ</b>	<b>C&amp;I</b>	✓	<b>24</b>	<b>103</b>	<b>185</b>	<b>278</b>	<b>98</b>			Haringey
HAR 7				Redcorn <b>Ltd, Brantwood Road</b> / Brantwood Auto Recycling Ltd, Willoughby Lane	<b>Brantwood Road, Tottenham, London N17 0ED</b>	<b>C&amp;I</b>	✓	<b>2,470</b>	<b>5,225</b>	<b>2,250</b>	<b>23,779</b>	<b>39,283</b>			Haringey
HAR 8				O'Donovan, Markfield	<b>82 Markfield</b>	<b>CDE</b>	✓	<b>5,079</b>	<b>27,330</b>	<b>31,460</b>	<b>25,674</b>	<b>123,308</b>			Haringey

Ref	Page	Policy/ Paragraph	Main Modification												
				Road, Tottenham	<b>Road, Tottenham, London N15 4QF</b>										
			HAR 9	Par View Road Reuse and Recycling centre	<b>Civic Amenity Site, Park View Road, Tottenham, London N17 9AY</b>	LACW	X	3,706	2,409	6,326	5,499	5,745	Haringey		
			HAR 10	London Waste Ltd, Western Road <b>Re- use and Recycling Centre</b> HWRC	<b>Western Road, Haringey N22 6UG</b>	LACW	X	0	0	2,526	4,851	3,799	Haringey		
			<b>HA R 11</b>	<b>Durnford Street Car Dismantler s &amp; Breakers</b>	<b>6-40 Durnford Street, Tottenham, London N15 5NQ</b>	C&I	✓	0	0	0	432	288			
			ISL 1	Hornsey Household Re-use & Recycling Centre <b>and Transfer Station</b>	<b>Hornsey street, Islington, London N7 8HU</b>	LACW	X	196,818	195,018	203,919	204,496	212,232	Islington		
			<b>WA F 1</b>	<b>Mercedes Parts Centre</b>	<b>21 Chingford Industrial Estate, Hall Lane, Chingford, London E4 8DJ</b>	C&I	✓	0	0	0	0	7			

Ref	Page	Policy/ Paragraph	Main Modification									
WAF 2			Kings Road Household Waste Recycling Centre	<b>Civic Amenity Site, 48 Kings Road, Chingford, London E4 7HR</b>	LACW	X	1,213	881	2,178	2,400	2,853	Waltham Forest
WAF 3			South Access Road Household Waste Recycling Centre	<b>42a South Access Road, Walthamstow, London E17 8BA</b>	LACW	X	2,917	2,784	6,790	6,949	7,203	Waltham Forest
WAF 4			GBN Services, Estate Way, Leyton									Waltham Forest
WAF 5			Vacant (previously T J Autos (UK) Ltd)	<b>17 Rigg Approach, Leyton, London E10 7QN</b>	C&I	✓	53	53	81	21	11	Waltham Forest
WAF 6			BJ Electronics, Ravenswood Road Industrial Estate, Walthamstow									Waltham Forest
WAF 8			Leyton Reuse & Recycling Centre	<b>Gateway Road, Leyton, London E10 5By</b>	LACW	X	2,164	2,255	2,564	3,003	2,589	Waltham Forest
WAF 9			Vacant (formerly BD & G parts for Rover)	<b>Roxwell Trading Park, Leyton</b>	C&I	-	0	0	0	0	0	

Ref	Page	Policy/ Paragraph	Main Modification									
WAF 10			Malbay Waste Disposal Ltd, Staffa Road, Leyton	<b>5 Staffa Road, Leyton, London E10 7PY</b>	C&I / CDE	✓	6,700	10,682	12,624	7,339	9,925	Waltham Forest
WAF 12±			Argall Metal Recycling Baseforce Metals, Unit ±, Staffa Road, Leyton	<b>Unit 1, Staffa Road E10 7PY</b>	C&I	✓	0	21,537	31,603	30,378	0	Waltham Forest
WAF 14			Tipmasters	<b>15 Rigg Approach, London E10 7QN</b>	C&I	X	0	0	586	2,847	3,622	Waltham Forest
WAF 15			Bits and Parts									Waltham Forest
WAF 16			<b>Whipps Cross Hospital Clinical Waste Treatment Facility</b>	<b>Whipps Cross Hospital, Whipss Cross Road, London E11 1NR</b>	C&I (clinical )	X	0	0	0	0	5	
			<p><b>[footnote to BAR3, BAR4, BAR6 and BAR7]</b></p> <p>These sites will be redeveloped under the approved planning permission for the regeneration of Brent Cross Circklewood (Barnet planning application reference F/04687/13). The Hendon Rail Transfer Station (BAR 4) will be replaced as part of the BXC development with a new facility on site S01-BA to meet the NLWA's requirements. <b>Planning permission for a new Waste Transfer Station (WTS) at Geron Way was granted by Barnet Council in September 2018.</b> The existing <b>commercial</b> facilities at BAR 6 and BAR 7 fall within the land required to deliver the first <b>early</b> Southern phase of the BXC regeneration which is anticipated will <b>has commenced; replacement capacity for these sites will be sought in accordance with the</b></p>									

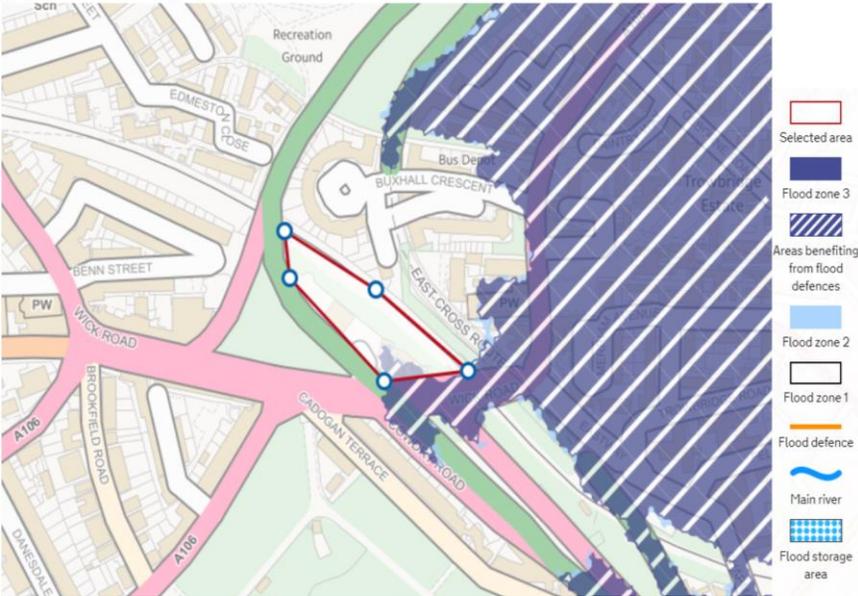
Ref	Page	Policy/ Paragraph	Main Modification
			<p><b>planning permission for Brent Cross Cricklewood.</b> in early 2018. Replacement capacity for these sites will not be provided prior to their redevelopment and therefore replacement capacity will be sought outside of the BXC regeneration area on alternative sites / areas to be identified within the London Borough of Barnet. <b>The BAR3 site is identified for redevelopment in Phase 4 of the BXC regeneration. It is planned that capacity at the waste facilities of BAR4, BAR6 and BAR7 and part of the capacity of BAR3 will be replaced by the new Waste Transfer Station (WTS) delivered as part of the Brent Cross Cricklewood Regeneration. The balance of the replacement capacity for BAR3 would need to be identified prior to its redevelopment and the London Borough of Barnet will seek to provide replacement capacity within the borough. The Barnet Local Plan will identify potential sites.</b></p>

Ref	Page	Policy/ Paragraph	Main Modification
MM105b		HAR 7	[Revision to safeguarded area for HAR 7 in Haringey's Policies Map]

Ref	Page	Policy/ Paragraph	Main Modification
			 <p>The map displays a residential and industrial area in Haringey, London. Key streets include Stockton Road, Le Veilby Road, Middleham Road, Brantwood Road, and Wiltchouly Lane. A large industrial site, labeled 'Factory', is the focus. A red outline indicates the 'Existing boundary' of this site, while a blue outline indicates the 'Proposed new boundary'. The proposed boundary is narrower than the existing one, particularly on the western side. A legend in the bottom right corner of the map area defines the red and blue outlines. Other nearby features include 'Elm Lea Trading Estate' and 'Wiltchouly Lane'.</p>

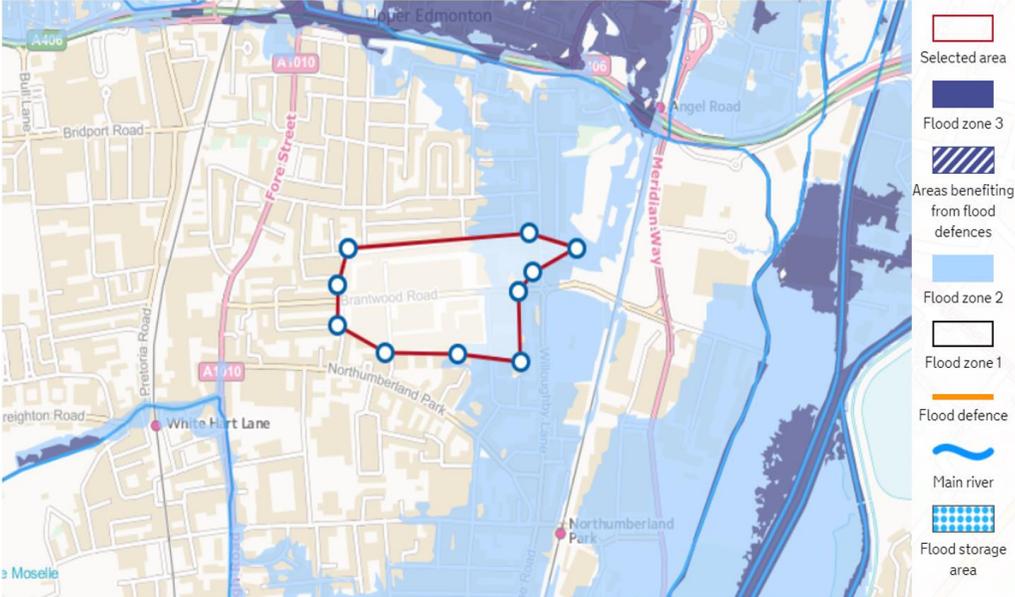
Ref	Page	Policy/ Paragraph	Main Modification			
MM106		Appendix 2: Barnet Area Profiles	<p>A05-BA Connaught Business Centre</p> <table border="1" data-bbox="660 304 2096 485"> <tr> <td data-bbox="660 304 1115 485">Historic Environment</td> <td data-bbox="1115 304 2096 485"> <del>No assets identified in vicinity.</del> <b>Within Watling Street Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</b> </td> </tr> </table>		Historic Environment	<del>No assets identified in vicinity.</del> <b>Within Watling Street Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</b>
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MM107		Appendix 2: Enfield Area Profiles	<p>12-EN Eleys Estate, Enfield</p> <table border="1" data-bbox="660 662 2119 1015"> <tr> <td data-bbox="660 662 1115 1015">Historic Environment</td> <td data-bbox="1115 662 2119 1015"> <p>Historic England commented that development should avoid harm to the historic environment and the setting of Chingford Mill Pumping Station (grade II) should be considered. <del>The potential archaeology value of area should be considered</del> along with the setting of Montagu Road Cemeteries Conservation Area.</p> <p><b>Within the Lea Valley West Bank Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</b></p> </td> </tr> </table>		Historic Environment	<p>Historic England commented that development should avoid harm to the historic environment and the setting of Chingford Mill Pumping Station (grade II) should be considered. <del>The potential archaeology value of area should be considered</del> along with the setting of Montagu Road Cemeteries Conservation Area.</p> <p><b>Within the Lea Valley West Bank Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</b></p>
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MM108		Appendix 2: Hackney Area Profiles	<p>A15-HC Millfields LSIS</p> <table border="1" data-bbox="660 1137 2119 1335"> <tr> <td data-bbox="660 1137 1115 1335">Historic Environment</td> <td data-bbox="1115 1137 2119 1335"> <p>There are three Grade II listed buildings adjacent to the west of site:</p> <ul style="list-style-type: none"> <li>• Hackney Borough Disinfecting Station <b>(on Heritage at Risk Register)</b></li> <li>• Shelter House</li> <li>• Caretakers Lodge</li> </ul> </td> </tr> </table>		Historic Environment	<p>There are three Grade II listed buildings adjacent to the west of site:</p> <ul style="list-style-type: none"> <li>• Hackney Borough Disinfecting Station <b>(on Heritage at Risk Register)</b></li> <li>• Shelter House</li> <li>• Caretakers Lodge</li> </ul>
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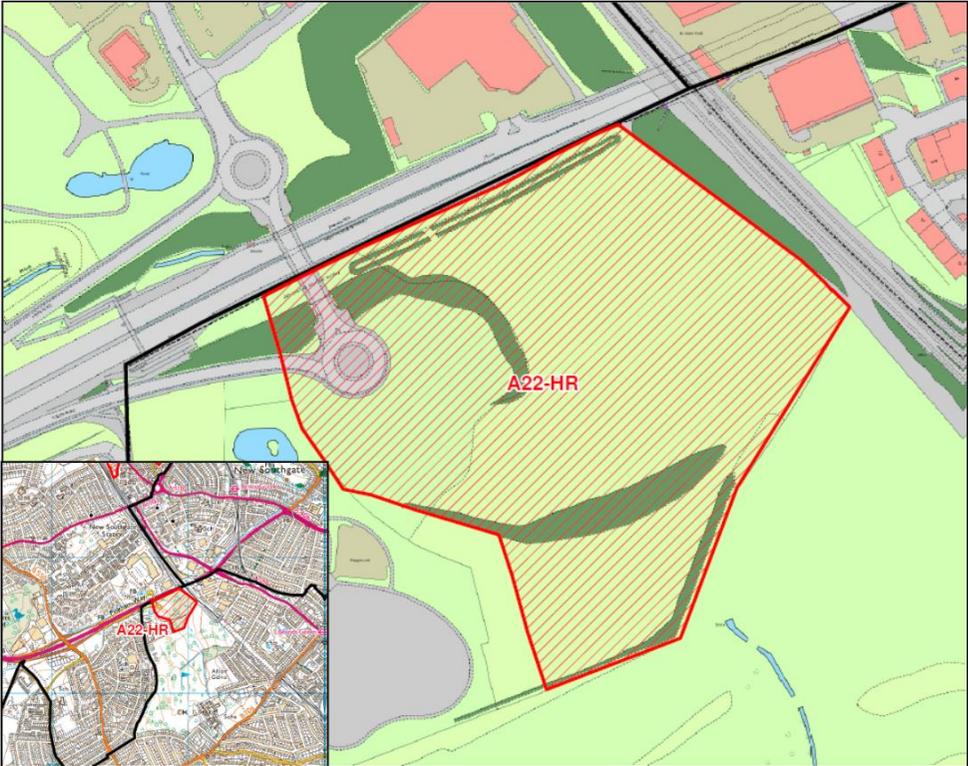
Ref	Page	Policy/ Paragraph	Main Modification	
				<p>The Mandeville Primary School which is Grade II listed is situated to the south of the area.</p> <p>Historic England has commented that any development within the area located to the east and north of these assets must address their long term conservation needs in a comprehensive manner.</p> <p><b>Within Lea Valley Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</b></p>
MM109		Appendix 2: Hackney LLDC Area Profiles	LLDC1-HC Bartrip Street	<p>Flood Risk</p> <p>Part of the southern area of Bartip St LSIS is within Flood Zone 2 (medium risk) although the area benefits from flood defences. The area is at risk from surface water flooding.</p> <p><b>The site area is largely within Flood Zone 1 with the southern most part falling partially within Flood Zones 2 and 3, noting that the Flood Zone 3 is within an area benefiting from defence. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.</b></p> <p><b>The site area is shown to flood from the River Lea / Lee Navigation in the 1% AEP event (without defences) and this will potentially increase in the future as a result of climate change with 1% AEP event covering a greater extent of the site. The River Lea / Lee Navigation benefits from defences</b></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><b>and a site-specific flood risk assessment should consider how much these benefit the site area.</b></p> <p><b>A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.</b></p> <p><b>Part of the site area benefits from existing flood defences.</b></p> <p><b>Part of the site area benefits from existing flood defences.</b></p> <p>[updated map]</p> 

Ref	Page	Policy/ Paragraph	Main Modification		
MM110		Appendix 2: Hackney LLDC Area Profiles	<p data-bbox="658 261 1263 293">LLDC2-HC Chapman Road (Palace Close)</p> <table border="1" data-bbox="658 347 2123 1251"> <tr> <td data-bbox="658 347 965 1251">Flood Risk</td> <td data-bbox="965 347 2123 1251"> <p data-bbox="976 352 2112 411"><del>Flood Zone 2 (Medium probability of flooding) however the area benefits from flood defences.</del></p> <p data-bbox="976 424 1615 453">The area is at risk from surface water flooding.</p> <p data-bbox="976 504 2101 730"><b>The site area falls partially within Flood Zone 1 and 2 but is largely in Flood Zone 3, noting that this is within an area benefiting from defences. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.</b></p> <p data-bbox="976 783 2096 970"><b>The site area is shown to flood from the River Lea / Lee Navigation in the 1% AEP event (without defences) and this will potentially increase in the future as a result of climate change with 1% AEP event covering a greater extent of the site area. The River Lea / Lee Navigation benefits from defences and a site-specific flood risk assessment should consider how much these benefit the site area.</b></p> <p data-bbox="976 986 2067 1078"><b>A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.</b></p> <p data-bbox="976 1129 1966 1161"><b>The majority of the site area benefits from existing flood defence.</b></p> </td> </tr> </table>	Flood Risk	<p data-bbox="976 352 2112 411"><del>Flood Zone 2 (Medium probability of flooding) however the area benefits from flood defences.</del></p> <p data-bbox="976 424 1615 453">The area is at risk from surface water flooding.</p> <p data-bbox="976 504 2101 730"><b>The site area falls partially within Flood Zone 1 and 2 but is largely in Flood Zone 3, noting that this is within an area benefiting from defences. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.</b></p> <p data-bbox="976 783 2096 970"><b>The site area is shown to flood from the River Lea / Lee Navigation in the 1% AEP event (without defences) and this will potentially increase in the future as a result of climate change with 1% AEP event covering a greater extent of the site area. The River Lea / Lee Navigation benefits from defences and a site-specific flood risk assessment should consider how much these benefit the site area.</b></p> <p data-bbox="976 986 2067 1078"><b>A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.</b></p> <p data-bbox="976 1129 1966 1161"><b>The majority of the site area benefits from existing flood defence.</b></p>
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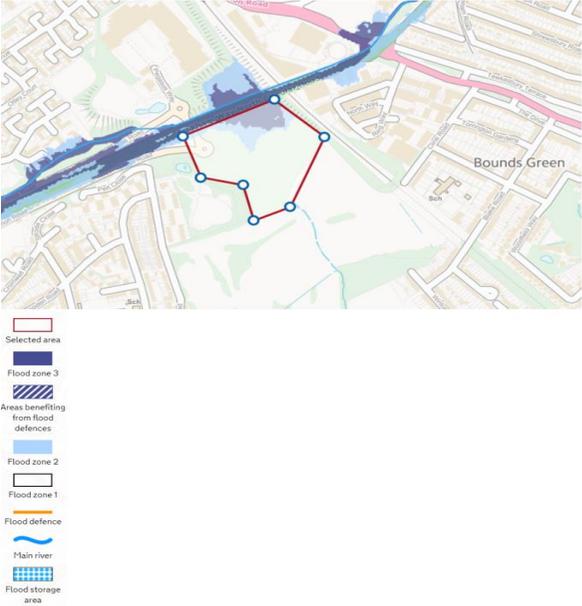
Ref	Page	Policy/ Paragraph	Main Modification	
			<p>[updated map]</p>	
MM111		Appendix 2: Haringey Area Profiles	A19-HR Brantwood Road	<p>Flood Risk</p> <p>The eastern section of the area lies within Flood Zone 2 (medium probability of flooding). The area is at risk from surface water flooding.</p> <p><b>The site area is largely Flood Zone 1 with the western most part of the site area falling partially within Flood Zone 2. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.</b></p>

Ref	Page	Policy/ Paragraph	Main Modification			
			<p data-bbox="981 220 2085 347"><b>The site area is shown to flood from the Pymmes Brook in the 0.1% AEP event (without defences) and this will increase in the future as a result of climate change with 1% AEP event to cover approximately one quarter of the site area.</b></p> <p data-bbox="981 400 2063 496"><b>A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.</b></p> <p data-bbox="992 571 1205 608">[updated map]</p> 			
MM112		Appendix 2: Haringey Area Profiles	<p data-bbox="663 1225 1111 1257">A21-HR North East Tottenham</p> <table border="1" data-bbox="663 1305 2123 1372"> <tr> <td data-bbox="663 1305 1137 1372">Historic Environment</td> <td data-bbox="1137 1305 2123 1372"><del>No assets identified in vicinity.</del> <b>Within the Lee Valley Archaeological Priority Area. Historic England commented that</b></td> </tr> </table>		Historic Environment	<del>No assets identified in vicinity.</del> <b>Within the Lee Valley Archaeological Priority Area. Historic England commented that</b>
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			there is potential for archaeological remains to be present and that further assessment should be undertaken.
MM113		Appendix 2: Haringey Area Profiles	<p>A22-HR Pinkham Way</p> <p><b>A22-HR – Friern Barnet Sewage Works (LEA 4)/ Pinkham Way, Haringey</b></p>  <p>© Crown Copyright and database right (2016). Ordnance Survey 100021551</p>

Ref	Page	Policy/ Paragraph	Main Modification																				
			<table border="1"> <thead> <tr> <th colspan="2" data-bbox="660 304 2119 344">Area Details</th> </tr> </thead> <tbody> <tr> <td data-bbox="660 344 1115 384"><b>Borough</b></td> <td data-bbox="1115 344 2119 384">Haringey</td> </tr> <tr> <td data-bbox="660 384 1115 424"><b>Type of Location</b></td> <td data-bbox="1115 384 2119 424">Area</td> </tr> <tr> <td data-bbox="660 424 1115 464"><b>Location Reference</b></td> <td data-bbox="1115 424 2119 464">A22-HR – Friern Barnet Sewage Works (LEA 4) /Pinkham Way</td> </tr> <tr> <td data-bbox="660 464 1115 504"><b>Size</b></td> <td data-bbox="1115 464 2119 504">5.95ha</td> </tr> <tr> <td data-bbox="660 504 1115 584"><b>Area Description</b></td> <td data-bbox="1115 504 2119 584">Land is currently unused and has become over grown with trees and vegetation.</td> </tr> <tr> <td data-bbox="660 584 1115 663"><b>Description of surrounding uses</b></td> <td data-bbox="1115 584 2119 663">Pinkham Way and retail park to north, industrial properties east. Golf course south and a park and residential properties to the west.</td> </tr> <tr> <th colspan="2" data-bbox="660 663 2119 703">Planning Information</th> </tr> <tr> <td data-bbox="660 703 1115 775"><b>Planning Designation</b></td> <td data-bbox="1115 703 2119 775">The Area is designated a Local Employment Area (LEA) and a Borough SINC.</td> </tr> <tr> <td data-bbox="660 775 1115 1270"><b>Relevant Local Plan Policy</b></td> <td data-bbox="1115 775 2119 1270"> <p><b>Former Friern Barnet Sewage Works / Pinkham Way Area has the following planning designations on the site: Site of Importance for Nature Conservation Grade 1, Local Employment Area: Employment Land, Flood Zone 2 and 3 (part).</b></p> <p><b>The area is subject to the following key Local Plan policies: - SP13: Open Space and Biodiversity, DM 20: Open Space and Green Grid, SP8: Employment, DM 37: Maximising the Use of Employment Land and Floorspace, and DM 24: Managing and Reducing Flood Risk.</b></p> <p><del>The Area is subject to Local Plan policy SP8: Employment. Friern Barnet site falls within the Borough's Specific Proposal 5, Employment generating uses subject to no adverse effect on the nature conservation value of the site.</del></p> </td> </tr> </tbody> </table>	Area Details		<b>Borough</b>	Haringey	<b>Type of Location</b>	Area	<b>Location Reference</b>	A22-HR – Friern Barnet Sewage Works (LEA 4) /Pinkham Way	<b>Size</b>	5.95ha	<b>Area Description</b>	Land is currently unused and has become over grown with trees and vegetation.	<b>Description of surrounding uses</b>	Pinkham Way and retail park to north, industrial properties east. Golf course south and a park and residential properties to the west.	Planning Information		<b>Planning Designation</b>	The Area is designated a Local Employment Area (LEA) and a Borough SINC.	<b>Relevant Local Plan Policy</b>	<p><b>Former Friern Barnet Sewage Works / Pinkham Way Area has the following planning designations on the site: Site of Importance for Nature Conservation Grade 1, Local Employment Area: Employment Land, Flood Zone 2 and 3 (part).</b></p> <p><b>The area is subject to the following key Local Plan policies: - SP13: Open Space and Biodiversity, DM 20: Open Space and Green Grid, SP8: Employment, DM 37: Maximising the Use of Employment Land and Floorspace, and DM 24: Managing and Reducing Flood Risk.</b></p> <p><del>The Area is subject to Local Plan policy SP8: Employment. Friern Barnet site falls within the Borough's Specific Proposal 5, Employment generating uses subject to no adverse effect on the nature conservation value of the site.</del></p>
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Ref	Page	Policy/ Paragraph	Main Modification	
				The area is subject to policy SP13: Open Space and Biodiversity. Friern Barnet is allocated as Borough Grade 1 SINC, and for employment uses in the Local Plan.
			<b>Land Use</b>	
			<b>Co-location</b>	This Area would allow for co-location with complementary activities due to its size and highway accessibility.
			<b>Major New Developments</b>	None identified locally
			<b>Decentralised Energy Network</b>	<p>The Enfield potential Decentralised Energy area lies approximately 65m northeast of Friern Barnet.</p> <p>Not considered to be a practical option due to distance from potential users.</p> <p>Friern Barnet is in an area of low energy consumption (as site <b>Area</b> undeveloped). Areas northeast, east and west of site <b>Area</b> are high energy consumption zones.</p>
			<b>Details of in-situ infrastructure</b>	None identified
			<b>Constraints</b>	
			<b>Flood Risk</b>	<p>North boundary and northeast corner of the area is within Flood Zone 2 (medium probability of flooding).</p> <p>Any development on the area will increase impermeable surfaces and therefore increases surface water runoff which would need to be managed. It is understood that historical use of the area may have left contamination. It is unknown whether or not this previous use has an impact on the quality of groundwater. This could be ascertained through any planning application which may offer the opportunity to provide appropriate remediation.</p> <p><b>The site Area is largely within Flood Zone 1 with an area to the north of the site Area falling partially within Flood Zones 2 and 3. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report</b></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><b>and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.</b></p> <p><b>Part of the site Area is shown to flood from the Bounds Green Brook in the 1% AEP event (without defences) and this will potentially increase in the future as a result of climate change with 1% AEP event covering a greater extent of the site Area.</b></p> <p><b>A site specific flood risk assessment will therefore be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.</b></p> <p>[updated map]</p> 

Ref	Page	Policy/ Paragraph	Main Modification	
			<b>Surface and Groundwater</b>	Not within a Source Protection Zone or principle <b>principal</b> aquifer. Bounds Green Brook lies approximately 40m north of <b>site Area</b> . A pond lies approximately 10m west of <b>site Area</b> and unnamed water course lies approximately 20m south of <b>site Area</b> .
			<b>Land Instability</b>	The Environment Agency records historic landfilling in the area. This may represent a ground stability issue and as such further investigation will be required at the planning application stage.
			<b>Sensitive Receptors</b> (may be impacted by dust, fumes, emissions to air, odours, noise and vibration, vermin and birds, litter hazards)	Residential properties lie west of Friern Barnet. Given the scale of the area there is scope to create a buffer around any waste management facility and orientate the facility away from residents.
			<b>Nature Conservation</b>	Area is within a Borough Site of Importance for Nature Conservation which includes the adjacent Park and Golf Club. A number of ecology surveys have been undertaken and identified habitat of "potential value to a number of protected and notable species". <b>There is an ecological corridor to the east of the area along the railway embankment.</b> Japanese Knotweed and Giant Hogweed have been identified in abundance across <b>site Area</b> . There is currently no active management of the SINC.
			<b>Green Belt and Open Space</b>	Land adjacent to the south and west of the area is designated as Metropolitan Open Land.
			<b>Historic Environment</b>	No features identified
			<b>Highways</b>	The Area would require the creation of an access to the roundabout on Orion Road/Pegasus Way. This would need to be designed to allow HGVs and refuse vehicles. The existing roundabout is suitable for these movements. Access to the North Circular is relatively easy from either Orion Road [heading east] or from Pegasus Way [to head west]. The Colney Hatch Lane/North Circular Road junction suffers from congestion at peak times. Use of the <b>site Area</b> for waste would add to HGV/refuse vehicle movement but is unlikely to have a significant impact on the

Ref	Page	Policy/ Paragraph	Main Modification	
				operation of this junction, based on 60 in/out movements per day for refuse vehicles plus 40 bulk transport in/out movements.
			<b>Conclusion</b>	
			<b>Potential Uses</b>	<p><del>Integrated resource recovery facilities/resource parks, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment</del>  Waste transfer, processing and <del>R</del>recycling, indoor <del>e</del>Composting, <b>including indoor</b> in-vessel composting and outdoor composting. Thermal Treatment facilities may be viable but should only be considered if a combined heat and power facility could be incorporated into the facility and linked up to a district heating system.</p> <p>Areas not lying within Flood Zone 3 are potentially suitable to handle hazardous waste.</p>
			<b>Uses unlikely to be suitable</b>	N/A
			<b>Potential mitigation measures</b>	<p><b>The Area covers land owned separately by the North London Waste Authority and the London Borough of Barnet.</b></p> <p>There are a number of <b>policy</b>, environmental and amenity issues facing this area, although it previously accommodated a sewage treatment works. <b>The Area</b> has revegetated, contains a number of mature trees and is designated as a SINIC.</p> <p><b>Due to the number of designations affecting this Area, only a proportion of the overall area will be suitable for development. Given the land is in two ownerships and Barnet has no current plans to develop a waste facility, this is likely to impact on the deliverability of the site in its entirety. A smaller part of the site area in NLWA's single ownership is therefore most likely to accommodate any development. The location of new development within the Area will be assessed against flood risk criteria in the NPPF and a site-specific flood risk assessment will be required. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where</b></p>

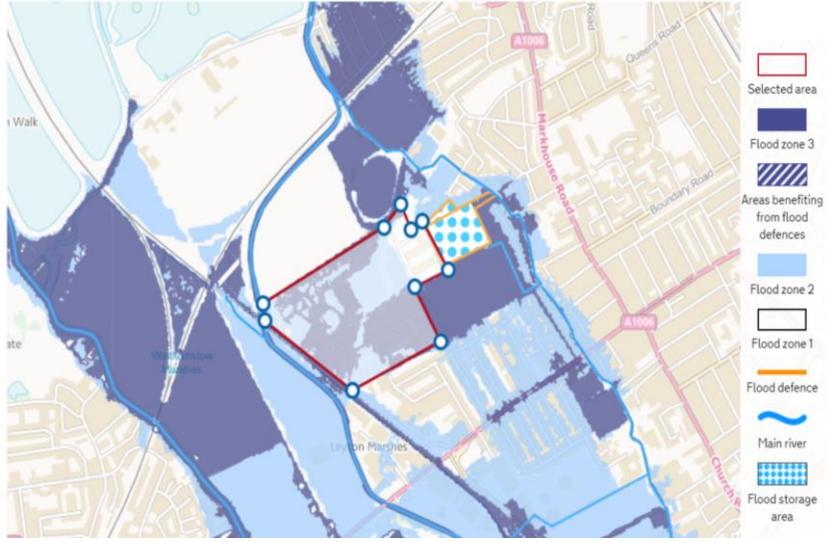
Ref	Page	Policy/ Paragraph	Main Modification
			<p>development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.</p> <p>Given the constraints on the Area, the site footprint should be minimised, taking into account the necessary operational elements of a waste facility, for example space for turning and parking for waste vehicles, processing area with sufficient room for equipment for waste treatment, and areas for the storage and stockpiling of materials. This should be on level areas where feasible.</p> <p>The location of new development should take the opportunity to create an appropriate buffer zone between the proposed facility and nearby sensitive receptors, including residential properties.</p> <p>Any new waste facility in this Preferred Location will need to be in line with the Haringey's Local Plan and the London Plan. There are community concerns around the development of a waste facility within this Area and how this will affect the natural environment, flood risk and biodiversity in the Area. Specific policy considerations on this topic are set out below. Consultation with the local community will be required for any proposed waste facility on this site.</p> <p>In line with London Plan policy G6: 'Biodiversity and access to nature', development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. In line with London Plan policy G7: 'Trees and Woodland', development proposals should ensure that, wherever possible, existing trees of value are retained.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><b>In line with Local Plan policy DM19: 'Nature Conservation', development proposals should protect and enhance the nature conservation value of the area. Development that has a direct or indirect adverse impact upon important ecological assets will only be permitted where the harm cannot be reasonably avoided and it has been suitably demonstrated that appropriate mitigation can address the harm caused.</b></p> <p><b>In line with London Plan Policy G6D, any development needs to achieve biodiversity net gain that leaves the biodiversity in a better state than before the development. This should be outside the areas at risk of flooding (Zone 2 and 3), suitably buffered from the ecological corridor to the east of the area, and subject to up-to-date Biodiversity and Wildlife surveys, be on land that is not identified as having priority species or habitats.</b></p> <p><b>An appropriate ecological survey will be required to identify significant ecological features to retain or replace. Consideration should be given to the retention and protection of existing mature trees and the designation and management of appropriate areas of habitat to be retained and enhanced.</b></p> <p><b>Mitigation measures should include continued habitat connectivity with the adjacent green spaces and ecological corridor along the railway embankment that needs to be retained and enhanced.</b></p> <p><del>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.</del></p>

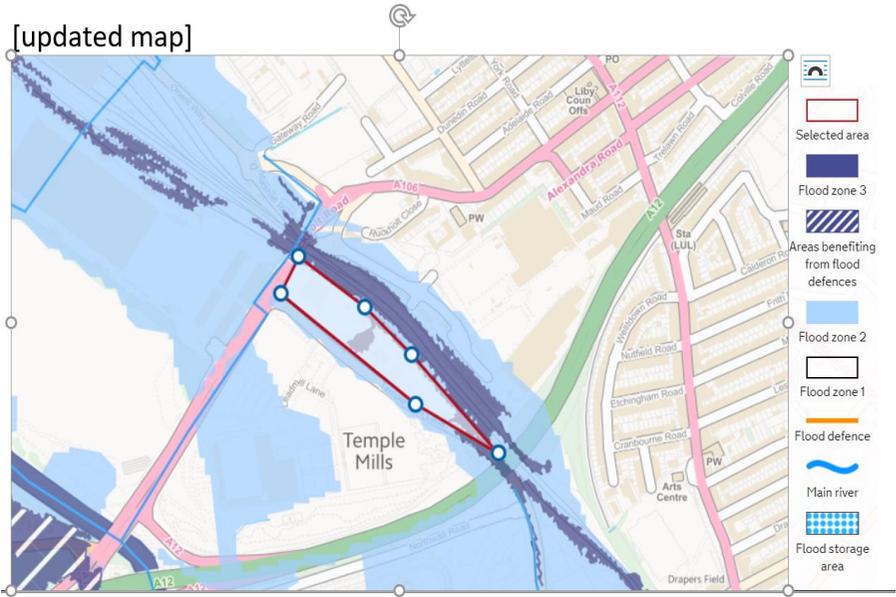
Ref	Page	Policy/ Paragraph	Main Modification
			<p><b>In line with Local Plan policy DM21: 'Sustainable Design, Layout and Construction', buildings within the development should be designed to complement nature conservation by maximising opportunities to enhance biodiversity, including through appropriate landscaping, Sustainable Drainage Systems, living roofs and green walls.</b> Mitigation measures would be required to protect the amenity of sensitive receptors including hours of working, noise and odour suppression.</p> <p><del>Consideration should also be given to the creation of an appropriate buffer between waste management facility and nearby sensitive receptors.</del></p> <p>Provision of an acceptable access <del>of</del> <b>from</b> Orion Road Roundabout would be required.</p> <p><b>Any application should demonstrate how public access to the remainder of the Area could be achieved.</b></p> <p><b>The Muswell Hill Golf Course Brook runs in culvert through the Pinkham Way Priority Area. Opening up the watercourse could bring multiple flood risk, biodiversity and amenity benefits and should be given consideration as site-specific development proposals are advanced.</b></p> <p><b>Any application will need to have regard to the needs of different users of the Area to ensure the safe operation of the waste management facility.</b></p> <p>A contamination and ground stability appraisal would be required to assess potential impacts from the historic landfill within the Area boundary.</p>

Ref	Page	Policy/ Paragraph	Main Modification					
				<p>As parts of the Area <b>fall within flood Zone 2 and 3</b> are at a medium risk of flooding, 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. <b>Any necessary SuDS should be designed to integrate with other nature conservation elements.</b></p> <p>For any proposed development which involves an increase in built footprint within the modelled extent of the 1 in 100 chance in any year flood event, taking the impacts of climate change into account, or where the footprint has been moved into a deeper area of floodplain than the existing built footprint, floodplain compensation will need to be provided on a volume for volume and level for level basis.</p>				
MM114		Appendix 2: Waltham Forest Area Profiles	A24-WF Argall Avenue	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td data-bbox="663 794 1115 975" style="width: 30%;"><b>Historic Environment</b></td> <td data-bbox="1115 794 2134 975">No assets identified in vicinity. <b>Within the River Lea and Tributaries Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</b></td> </tr> <tr> <td data-bbox="663 1023 1115 1367"><b>Flood Risk</b></td> <td data-bbox="1115 1023 2134 1367"> <p>The north of the area lies with Flood Zone 2 and 3 (medium to highest probability of flooding) with the southern tip lying within Zone 2. A flood storage area lies adjacent to the east of the northeast corner of the area.</p> <p>Facilities within Flood Zone 3 should only deal with inert waste unless otherwise agreed with the Environment Agency.</p> <p><b>The site area falls partially within Flood Zone 1, Flood Zone 2 and Flood Zone 3. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential</b></p> </td> </tr> </table>	<b>Historic Environment</b>	No assets identified in vicinity. <b>Within the River Lea and Tributaries Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</b>	<b>Flood Risk</b>	<p>The north of the area lies with Flood Zone 2 and 3 (medium to highest probability of flooding) with the southern tip lying within Zone 2. A flood storage area lies adjacent to the east of the northeast corner of the area.</p> <p>Facilities within Flood Zone 3 should only deal with inert waste unless otherwise agreed with the Environment Agency.</p> <p><b>The site area falls partially within Flood Zone 1, Flood Zone 2 and Flood Zone 3. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential</b></p>
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Ref	Page	Policy/ Paragraph	Main Modification
			<p><b>Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.</b></p> <p><b>However, development should be avoided on the part of the site area which lies within the functional floodplain.</b></p> <p><b>The site area is shown to flood from the River Lee and Dagenham Brook in the 1% AEP event (without defences) and this will potentially increase with the future as a result of climate change with 1% AEP event covering a greater extent of the site area.</b></p> <p><b>A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.</b></p> <p><b>For any proposed development which involves an increase in built footprint within the modelled extent of the 1 in 100 chance in any year flood event, taking the impacts of climate change into account, or where the footprint has been moved into a deeper area of floodplain than the existing built footprint, floodplain compensation will need to be provided on a volume-for-volume and level-for-level basis.</b></p>

Ref	Page	Policy/ Paragraph	Main Modification					
				<p>[updated map]</p>  <p>The map shows the Temple Mill Lane area with various flood zones and features. A legend on the right side of the map includes the following items:</p> <ul style="list-style-type: none"> <li>Selected area (red outline)</li> <li>Flood zone 3 (dark blue)</li> <li>Areas benefiting from flood defences (hatched pattern)</li> <li>Flood zone 2 (light blue)</li> <li>Flood zone 1 (white)</li> <li>Flood defence (orange line)</li> <li>Main river (blue wavy line)</li> <li>Flood storage area (blue grid pattern)</li> </ul>				
MM115		Appendix 2: Waltham Forest LLDC Area Profiles	<p>LLDC3-WF Temple Mill Lane</p> <table border="1" data-bbox="660 938 2123 1345"> <tr> <td data-bbox="660 938 1115 1078"><b>Historic Environment</b></td> <td data-bbox="1115 938 2123 1078">No assets identified in vicinity. <b>Within the River Lea and Tributaries Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</b></td> </tr> <tr> <td data-bbox="660 1123 1115 1345"><b>Flood Risk</b></td> <td data-bbox="1115 1123 2123 1345">The majority of the site lies within Flood Zone 3 (highest probability of flooding). Parts of the eastern half of the area lie within Flood Zone 2 (medium probability of flooding). Environment Agency — Facilities within Flood Zone 3 should only deal with inert waste unless otherwise agreed with the Environment Agency.</td> </tr> </table>		<b>Historic Environment</b>	No assets identified in vicinity. <b>Within the River Lea and Tributaries Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</b>	<b>Flood Risk</b>	The majority of the site lies within Flood Zone 3 (highest probability of flooding). Parts of the eastern half of the area lie within Flood Zone 2 (medium probability of flooding). Environment Agency — Facilities within Flood Zone 3 should only deal with inert waste unless otherwise agreed with the Environment Agency.
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Ref	Page	Policy/ Paragraph	Main Modification
			<p>The site area is largely Flood Zone 2 with a small area of Flood Zone3. The proposed use for the site is considered to be 'Less Vulnerable'. The site has been subject to the Sequential Test as set out in the October 2019 Flood Risk Sequential Test Report and found to be appropriate for development by virtue of lack of reasonably available alternative sites at less risk of flooding. The exception test would not be applicable.</p> <p>The site area is shown to flood from the River Lee and Dagenham Brook in the 1% AEP event (without defences) and this will potentially increase with the future as a result of climate change with 1% AEP event covering a greater extent of the site area.</p> <p>A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current climate change allowances at the time of submission.</p> <p>For any proposed development which involves an increase in built footprint within the modelled extent of the 1 in 100 chance in any year flood event, taking the impacts of climate change into account, or where the footprint has been moved into a deeper area of floodplain than the existing built footprint, floodplain compensation will need to be provided on a volume-for-volume and level-for-level basis.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>[updated map]</p>  <p>The map displays the Temple Mills area, including roads like A106, A12, and A122, and landmarks such as the Arts Centre and Drapers Field. It features a legend with the following items:</p> <ul style="list-style-type: none"><li>Selected area (red outline)</li><li>Flood zone 3 (dark blue)</li><li>Areas benefiting from flood defences (hatched pattern)</li><li>Flood zone 2 (light blue)</li><li>Flood zone 1 (white)</li><li>Flood defence (orange line)</li><li>Main river (blue wavy line)</li><li>Flood storage area (blue grid pattern)</li></ul>

# **North London Waste Plan Adoption Stage Equality Impact Assessment**

**Addendum Report  
December 2021**

# Equality Impact Assessment

## **Name of Document to be Assessed:**

The North London Waste Plan (NLWP)

## **Completed by:**

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Email: maeliosa.hardy@capita.com

Date Signed off: 15.12.21

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## Introduction

1.1 This addendum report should be read in conjunction with the main Equality Impact Assessment report produced in January 2019 in support of the joint North London Waste Plan (NLWP) that was submitted for independent examination<sup>1</sup>. This addendum report also assesses the Main Modifications to the NLWP that have been required to ensure legal compliance and soundness of the Plan.

1.2 The EqlA produced in support of the submitted NLWP together with this EqlA addendum have been produced by consultants who have had no direct involvement in preparation or drafting of the NLWP document itself.

1.3 The purpose of the Equality Impact Assessment (EqlA) is to find out whether the implementation of the NLWP will affect different groups of people in different ways, and how this has been taken into account during the development of the document and its policies. In the context of the NLWP Local Plan Document this covers consideration of the plan's policies and proposals. The assessment has been prepared in accordance with the Equality Analysis process followed at previous stages of the waste plan's production.

1.4 The Equality Act 2010 defines the Public Sector Equality Duty and requires public bodies to be pro-active in achieving positive equality towards groups which may have been ignored in the past. The need to undertake an EqlA stems from the general duty placed on local authorities to eliminate unfair discrimination, advance equality of opportunity and foster good relations between people.

### Purpose

1.5 An EqlA is an evidence-based approach to policy development intended to ensure that policies, practices and decision-making processes are fair and do not present barriers to participation or disadvantage for protected groups. It provides a way to systematically anticipate and assess the consequences on different groups of people making sure that:

- unlawful discrimination is eliminated;
- opportunities for advancing equal opportunities are maximised; and
- opportunities for fostering good relations are maximised.

1.6 The assessment helps to focus on the impact on people who share one of the nine protected characteristics as defined by the Equality Act 2010, as well as on people who are disadvantaged due to socio-economic factors. The Public Sector Equality Duty which commenced in April 2011, requires public bodies to consider all individuals in shaping policy, delivering services, and in relation to their own employees. It requires public bodies to have regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people.

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<sup>1</sup> <https://www.nlwp.net/download/equality-impact-assessment-january-2019/?wpdmdl=1279&refresh=61b0768175ff51638954625>

1.7 The EqIA considers impacts on groups of people rather than on individuals and as such aims to assess the impact of the NLWP on the following:

- Race - this includes ethnic or national origins, colour and nationality;
- Disability;
- Gender - including gender reassignment;
- Sexual Orientation;
- Religion and Belief – this includes lack of belief;
- Age;
- Marriage and civil partnership;
- People who are pregnant or subject to maternity legislation; and
- People with dependents and caring responsibilities.

Although not a distinct group, the following is also considered:

- Socio-economic factors – this includes income level, educational attainment etc.

1.8 The assessment considers both (positive and negative) disproportionate and differential impacts. In some cases, protected characteristic groups could be subject to both disproportionate and differential equality effects.

1.9 A disproportionate effect arises when an impact has a proportionately greater effect on protected characteristic groups than on other members of the general population at a particular location. Therefore, disproportionality could arise from either:

- An impact predicted for the area where protected characteristic groups are known to make up a greater proportion of the affected resident population than their overall representation in the Borough/ NLWP area / Greater London or national level; or
- Where an impact is predicted in an area predominantly or heavily used by protected characteristic groups (e.g. primary schools attended by children, care homes catering for very elderly people).

1.10 A differential equality effect is one which affects members of a protected characteristic group differently from the rest of the general population due to a specific need, or a recognized sensitivity or vulnerability associated with their protected characteristic, regardless of the number of people affected.

1.11 As explained in the main EqIA<sup>2</sup> [Section 2 refers], it is recognised that many of the equality target groups listed above may overlap and have similar needs and/or be subject to similar prejudices. The analysis undertaken is mainly a spatial one, given that the impacts and the benefits of waste management facilities are felt on a local, geographical basis. Focussing on the above equality groups the analysis

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<sup>2</sup> <https://www.nlwp.net/download/equality-impact-assessment-january-2019/?wpdmdl=1279&refresh=61b0768175ff51638954625>

sought to inform whether the potential impacts of waste management facilities could be greater with regard to the equality groups.

1.12 As appropriate and relevant at each stage of producing the NLWP the Councils have needed to be mindful of the following questions:

- What is the NLWP trying to achieve?
- Who will benefit and whether the policy approach is likely to exclude a specific equality group or community?
- Will the NLWP affect some equality groups or communities differently and can this be justified?
- Does the NLWP have the potential to cause any adverse impact or discriminate against different groups in the community?
- Is the proposal or service to be delivered by the policy likely to be equally accessed by all equality groups and communities? If not, can this be justified?
- Are there any barriers that might make access difficult or stop different groups or communities accessing the proposal or service to be delivered by the policy?
- Could the policy promote equality and good relations between different groups?
- Does the activity make a positive contribution to equalities?

## What is the North London Waste Plan?

2.1. The North London Waste Plan (NLWP) provides the policy framework for decisions by the following seven North London Boroughs - Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest (the Borough Councils) - on waste matters over the period up until 2036. Covering the principal waste streams comprising Local Authority Collected Waste (LACW), Commercial and Industrial (C&I), Construction, Demolition and Excavation (CD&E), Hazardous, Agricultural, Wastewater / Sewage Sludge and Low-level radioactive waste (LLW), it seeks the retention and provision of a network of waste management facilities to enable the sustainable management of waste to achieve net waste self-sufficiency.

2.2 The jointly produced NLWP is a pivotal waste planning policy document forming part of the Local Plan for each of the seven Borough Councils. The Plan must be in general conformity with the Spatial Development Strategy i.e., the London Plan, under the terms of S24 of the Planning & Compulsory Purchase Act 2004 (as amended) (2004 Act). The extant version of the London Plan was published in March 2021.

2.3 Whilst each of the seven Borough Councils have strategic waste policies contained within their respective adopted local plans, the strategic waste policies defer to the NLWP to provide a more detailed planning framework for waste development. It sets out the over-arching planning strategy to which other planning documents produced by the Borough Councils and Neighbourhood Plans should be consistent. The adopted plan also facilitates delivery of the Joint Municipal Waste Management Strategy (JMWMS) prepared by the North London Waste Authority (NLWA).

2.4 The NLWP has two main purposes:

- to ensure there will be adequate provision of suitable land to accommodate waste management facilities of the right type, in the right place and at the right time up to 2036, to accommodate the amount of waste required to be managed in North London; and
- to provide policies against which planning applications for waste development will be assessed.

2.5 Changes to the planning system since 2010, including the introduction of the Localism Act 2011 and the National Planning Policy Framework (NPPF), have seen a move away from the principle of producing a portfolio of planning policy documents in the form of a Local Development Framework (LDF). Instead, the Government refers to Local Planning Authorities producing a 'Local Plan', which, where possible, consists of a single plan for the area. However, the Borough Councils have considered it appropriate to proceed with the jointly produced NLWP as a strategic level waste plan for covering the whole of their areas.

2.6 The Plan area also includes part of the London Legacy Development Corporation (LLDC), a Mayoral Development Corporation, which is the planning authority for a small part of Hackney and Waltham Forest and other Boroughs that

are not part of the NLWP constituent Borough Councils. However, the Plan cannot directly allocate sites/areas within the LLDC area as this is the responsibility of LLDC as the local planning authority. Although the LLDC is not allocated a share of the waste apportionment, the Plan is required to provide the planning policy framework for waste generated across the whole of the seven Boroughs, including the parts of Hackney and Waltham Forest that lie within the LLDC Area. A Memorandum of Understanding is in place that enables sites/areas identified as being suitable for waste management uses in the Plan in those parts of Hackney and Waltham Forest in the LLDC area to be allocated in the LLDC Local Plan.

## Production of the North London Waste Plan

3.1. Ongoing engagements with the public and key organisations have been undertaken throughout the production of the NLWP as part of the specific process followed in terms of the preparation of the Plan through to its adoption. Details of the various stages up until submission for examination are identified in section 3 of the main EqIA document<sup>3</sup> produced in January 2019.

3.2 As a result of the consultations undertaken at the regulation<sup>4</sup> 18 and 19 stages the NLWP Councils had a duty to consider representations and comments received, and then to make any necessary changes to policies in order to ensure that the version of the Plan submitted to the Secretary of State for consideration at examination by the appointed Inspector (regulation 22) was sound. Having considered these representations, the Borough Councils submitted the NLWP for examination on 8<sup>th</sup> August 2019 and hearing sessions were then subsequently held on 20 and 21 November 2019.

3.3 The ongoing review process continued as the Plan further evolved through the examination stage up until the final stage of adoption. In accordance with section 20(7C) of the Planning & Compulsory Purchase Act 2004, the Borough Councils requested that the Inspector recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. Therefore, following the hearing sessions, the Borough Councils prepared a schedule of the proposed modifications and, where necessary, carried out Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) of the changes. The MM schedule was then subject to public consultation for six weeks in October to December 2020.

3.4 The examination Inspector has taken account of the MM consultation responses in coming to the conclusions detailed in his report published on 27 October 2021. In paragraph 206 of his report the Inspector concludes, “the Duty to Cooperate has been met and that, with the recommended Main Modifications set out in the Schedule of Main Modifications, the North London Waste Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.” The Inspector is therefore satisfied that the North London Waste Plan as modified provides an appropriate basis for waste planning within the seven north London Borough Councils.

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<sup>3</sup> <https://www.nlwp.net/download/equality-impact-assessment-january-2019/?wpdmdl=1279&refresh=61a883e9960181638433769>

<sup>4</sup> [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uksi/2012/2700/contents/part-1/section-18)

## Approach to the Equality Impact Assessment

4.1 The NLWP sets out the overall vision and strategy for handling of waste and siting of waste facilities across the area of north London covered by the seven Borough Councils. On adoption, in respect of waste matters it will become the overarching basis of any other local development plan documents and their policies. Given the area covered by and scope of the NLWP, there may be potential for it to cause adverse impact or discriminate against different groups in the community. Carrying out an EqlA was therefore relevant.

4.2 The jointly prepared NLWP has been informed by a number of different elements for which the following list provides an overview.

- National influences - e.g. National Planning Policy Framework (NPPF), National Planning Policy for Waste (NPPW) and National Planning Practice Guidance (NPPG).
- Regional influences - e.g. Spatial Development Strategy for Greater London – The London Plan (2021).
- Other statutory documents produced by the Borough Councils.
- Evidence base studies.
- Sustainability Appraisal (SA) /Strategic Environmental Assessment (SEA).
- Habitats Regulations Assessment.
- Public and stakeholder consultation - (considered in section 5 of this addendum report).

### National Planning Policy Framework (NPPF)

4.3 Replacing a multitude of Planning Policy Statements and Guidance notes, the NPPF was originally published in March 2012. The NPPF is a concise document that has subsequently been amended<sup>5</sup> several times and which must be taken into account when preparing Local Plans. The framework sets out sustainable development principles for wide-ranging policies and makes clear (para 4) that it should be read in conjunction with the Government's planning policy for waste<sup>6</sup>. Also, that when preparing waste plans where relevant regard should be had to policies in the NPPF. The latest National Planning Practice Guidance (NPPG)<sup>7</sup> also provides guidance on the implementation of waste planning policy.

### The London Plan

4.4 Local waste plans such as the NLWP need to be in general conformity with the current London Plan adopted in March 2021. The London Plan sets out apportionments of waste to London boroughs who are then expected to allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide capacity to manage the apportioned tonnages of waste. As noted by the Inspector in his report<sup>8</sup>, the Mayor has confirmed that subject to the necessary Main

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<sup>5</sup> current version published in July 2021

<sup>6</sup> [National planning policy for waste - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

<sup>7</sup> [Waste - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

<sup>8</sup> Paragraph 15 of Inspector's report refers

Modifications being made, the NLWP is in general conformity with the London Plan 2021.

#### Evidence base studies

4.5 In developing planning policies it is essential that they are underpinned by robust evidence. Evidence gathering is a key element in the policy making process, it helps to identify the key issues and challenges faced by an area. Therefore, over the course of preparation of the NLWP a number of background technical studies have been produced and together informed the development of the Plan.

4.6 The NLWP is accompanied by a range of evidence base documents including a Data Study, Options Appraisal, Sites and Areas report and Duty to Co-operate report. There are also reports on the outcomes of all consultations on the NLWP. The evidence from these studies and reports, together with the representations received to the various consultations undertaken, has contributed to informing drafting of the objectives and policies detailed within the NLWP. All of these supporting documents can be viewed on the NLWP document centre website<sup>9</sup>.

4.7 Section 4 of the main EqIA report provides an overview of the NLWP area whilst section 5 explains how waste affects most people's lives in some way and considers who is most likely to be affected by the NLWP, including those groups and individuals considered most likely to benefit from the Plan's policies and proposals.

#### Sustainability Appraisal

4.8 Consideration has also been given to the environmental, economic and social objectives of the Plan through the Sustainability Appraisal process. This has helped to ensure that the social, environmental and economic impacts of the policies developed in the Plan are assessed and taken into account in the decision-making process. Also, that there is no preference to, or neglect of, any specific groups as part of the Plan process.

#### Habitats Regulations Assessment

4.9 The NLWP was also subject to a Habitats Regulations Assessment (HRA) during its preparation. This assessment<sup>10</sup> considered the effect of the implementation of the Plan on European protected sites within 10km of the Plan area. It concluded that the NLWP will not result in likely significant effects on any of the Natura 2000 Sites, either alone or in combination with other plans and projects in the Plan area.

4.10 An addendum to the HRA<sup>11</sup> assessed the subsequent Main Modifications and found that they do not have any implications for the HRA. As noted by the Inspector in his report<sup>12</sup>, "both assessments conclude that any potential harmful impacts on the nature conservation value of European sites that could arise from the implementation of the Plan can be avoided or mitigated and identifies that Policy 5 of the Plan

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<sup>9</sup> [Document Centre | North London Waste Plan \(nlwp.net\)](https://nlwp.net)

<sup>10</sup> As required by the Conservation of Habitats and Species Regulations 2017 (as amended).

<sup>11</sup> Produced in September 2020 (NLWP EIP document number CD1/14/Add)

<sup>12</sup> See paragraph 36 of the NLWP Inspector's report

provides an important safeguard for European sites in this regard.” Noting that no statutory consultees or other relevant organisations dispute the findings of the HRA and the addendum produced, the Inspector stated that he is satisfied that the relevant legal requirements relating to Habitats Regulations Assessment have been met.

## Consultation and Engagement

5.1. Throughout the preparation and production stages of the NLWP the views and opinions expressed by those individuals and organisations that have an interest in the area have been fundamental to the plan's content. The consultations undertaken at different stages of the draft NLWP have provided an opportunity for stakeholders and communities to comment on and influence the content of the emerging plan and proposed policies.

5.2 The outcomes of these consultations undertaken at these earlier stages are summarised in section 3 of the main EqIA with full details provided in background documents produced. These documents, including the January 2019 report on consultation,<sup>13</sup> and the subsequent consultation report on the modifications. These reports detail the consultation process that was carried out and the responses received to earlier drafts of the NLWP and can be viewed on the NLWP website.<sup>14</sup>

5.3 Representations made during consultation on the Regulation 19 version of the NLWP were submitted to the independent PINS Inspector for examination, along with the draft NLWP and supporting documents. These were then considered by the Inspector as part of the examination process, together with any subsequent proposed changes arising from the representations made at Regulation 19 stage.

5.4 Following examination hearing sessions held in November 2019, a schedule of proposed Main Modifications (MMs) was published and formally consulted on for a six-week period. In finalising his report issued in October 2021 and arriving at his recommendation that the accompanying schedule of MMs be included in the NLWP, the Inspector took account of the responses received to the MMs. The conclusions reached by the Inspector on these matters are covered in below in the following sections of this EqIA addendum report.

### Duty to Cooperate

5.5 The duty to co-operate introduced by the Localism Act 2011 requires local planning authorities to formally co-operate with other local planning authorities and bodies prescribed in the Town and Country Planning (Local Planning) (England) Regulations 2012 on strategic matters. The ability to demonstrate that the requirements of the duty to co-operate has been met in terms of engaging constructively, actively and on an ongoing basis in developing strategic policies, has been an essential part of the plan making process for the NLWP. Under the duty the Borough Councils have worked closely with other waste planning authorities that are critical for the delivery of an effective waste strategy for North London.

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<sup>13</sup> <https://www.nlwp.net/download/report-on-draft-plan-consultation-january-2019/?wpdmdl=1287&refresh=61b1c5817e49a1639040385>

<sup>14</sup> [Document Centre | North London Waste Plan \(nlwp.net\)](#)

### Availability of the Documentation

5.6 Each consultation version of the NLWP was published on the NLWP website. As well as making the document available electronically hard copies of the NLWP documents were placed in each of the Council's main offices and libraries and made available for viewing. During the period that Covid restrictions affected the ability of consultees to access to documents in main council offices and libraries, hard copies were made available on request. The Plan document was also available on request in a number of different formats, including large print, brail, audiotape, disk or in another language.

# Assessment of the Main Modifications and Monitoring of the North London Waste Plan

## Consideration of the Main Modifications

6.1 With regard to the EqIA and the protected characteristics outlined in the Equality Act 2010 an assessment is needed and judgement made as to how, if at all, the NLWP policies and proposals would impact on the identified equality groups. The assessment would only identify a positive or negative impact where:

- The impact is expected to be greater for the assessed group than for the population as a whole; or
- Where it affects an equality group differently from the rest of the Boroughs' population because of specific needs or a recognised vulnerability.

6.2 In his report (see pages 4 and 5) the Inspector provides a summary of the modifications which includes:

- Ensuring that the selection process to identify areas to manage the identified waste needs over the Plan period is consistent with the spatial principles of the Plan and is fully justified and explained.
- Ensuring that the methodology and justification for the identification of Preferred Areas for the management of North London's waste over the Plan period are justified and explained.
- Ensuring that the Plan's policies ensure that waste management development proposals provide an adequate balanced approach to protect people and the environment whilst delivering the aims, strategic objectives and spatial principles of the Plan.
- Revising the monitoring and implementation framework to provide a more robust mechanism to assess the delivery of the Plan against its aims, strategic objectives and spatial principles.

6.3 Specifically in respect of consideration of the Main Modifications (MMs) made to the NLWP no negative impacts have been identified. Accordingly, with the exception of the potentially positive differential effects, a few examples of which are explained below, there is little additional to that which is already stated in main EqIA report.<sup>15</sup> (See section 5, in respect of each of the groups most likely to be affected by the NLWP, and 6 with regards to the screening and the equality strands listed there).

6.4 The location of existing waste management sites fails to create an even geographical spread across the seven constituent Borough Councils. Most of the sites being located to the east of the area in the Lee Valley corridor with a particular concentration within the London Borough of Enfield<sup>16</sup>. The MMs considered by the Inspector in his report<sup>17</sup> under "Issue 2 – Whether the Spatial Framework for waste

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<sup>15</sup> <https://www.nlwp.net/download/equality-impact-assessment-january-2019/?wpdmdl=1279&refresh=61b1e4c7a69c91639048391>

<sup>16</sup> Main Modification 7 explains that Enfield contributes 62% of land currently in waste use in North London, compared to 18% in Barnet, 12% in Haringey and 5% or less in the remaining constituent Boroughs.

<sup>17</sup> Paragraphs 55 to 69 of the Inspector's Report refer.

management is appropriate, is fully justified by the evidence and is soundly based” – will, taken together have a positive impact in terms of assisting to create a more sustainable pattern of waste development across North London.

6.5 Policy 2 (Priority Areas for new waste management facilities) in the NLWP seeks to extend the existing spread of locations for waste facilities by identifying locations that are suitable for waste management use. The MMs serve to better explain how these ‘Priority Areas’ for new waste facilities have been identified as well as how it is intended that a better geographical spread of waste facilities will be achieved. This will be through limiting the number of Priority Areas in Enfield and the introduction of an area-based approach that identifies certain industrial and employment areas as being the most suitable for waste management uses. It is further explained in the MMs that Policy 2 promotes an ‘outside of Enfield first’ approach in considering new proposals for waste management and identifies that the combination of existing waste sites and Priority Areas will provide a more sustainable and appropriately located network of waste facilities in the Plan area.

6.6 As the anticipated population of the respective Borough Councils continues to increase so it is likely will the demand for housing, employment and infrastructure facilities and, associated with this growth, the amounts of waste likely to be generated. Focusing waste facilities in a more even geographical spread and at accessible locations closer to facilities and services should reduce the need to transport waste and thereby be more sustainable and minimise impacts. MM11 for example assists in this respect by providing additional text to paragraph 4.26 of the Plan to explain that NLWP Policy 5 requires the consideration of sustainable transport modes in waste development proposals. It also explains that traffic movements can have an impact on amenity along the routes used and that Policy 5 also seeks to minimise such impacts where possible, with reference to the use of low emission vehicles.

6.7 Other MMs largely refer to matters of re-drafting to provide clarification, additional detail and / or the updating of information and are not considered to directly give rise to EqIA considerations in terms of having differential impact on the various equality groups. Overall, therefore, the Equality Impact Assessment of the MMs to the NLWP policies are considered to have either no differential or a positive impact on the recognised equality groups, and no negative impacts on any of the protected characteristic groups.

### [Inspector’s Conclusions](#)

6.8 With regard to the **Public Sector Equality Duty**, the Inspector commented in paragraphs 21 and 22 of his report as follows:

“Throughout the examination, I have had due regard to the equality impacts of the Plan in accordance with the Public Sector Equality Duty, contained in Section 149 of the Equality Act 2010. The Equality Impact Assessment (January 2019) (EqIA) (CD1/17) identifies that the Plan does not lead to any adverse impacts or cause discrimination to any particular groups within the Plan area.

I have detected no issue that would be likely to impinge upon the three aims of the Act to eliminate discrimination, advance equality of opportunity and foster good relations or affect persons of relevant protected characteristics of age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. Overall, I have no reason to question the conclusions of the submitted EqlA that the Plan is not expected to discriminate against any sections of the community.”

6.9 Additionally, in relation to meeting the **Duty to Cooperate** the Inspector states<sup>18</sup> that:

“Overall, I am satisfied that, where necessary, the Borough Councils have engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the DtC has therefore been met.”

6.10 With regards **public consultation and engagement** the Inspector<sup>19</sup> in his report concludes:

“During various stages of Plan preparation, consultation on the Plan and the MMs was carried out in compliance with the adopted Statements of Community Involvement (SCIs) for each of the Borough Councils. The requirements of these SCIs were reflected in the Plan Consultation Protocol (CD1/18). The Consultation Statement – August 2019 (CD1/3) and the Consultation Report – Main Modifications Consultation – March 2021 (CD1/3/MM) provide evidence of how community involvement has been achieved.”

6.11 In respect of **Sustainability Appraisal** the Inspector<sup>20</sup> records that:

“The Plan was subject to Sustainability Appraisal (SA) during its preparation (CD1/2). Addendums to the SA were also produced to inform the proposed main modifications (CD1/2/Add and CD1/2/Add-MM). No statutory consultees have raised any significant concerns about the sustainability appraisal process.”

He then continues concluding that:

“Overall, I am satisfied that the sustainability appraisal was proportionate, objective, underpinned by relevant and up to date evidence, and compliant with legal requirements and national guidance.”

6.12 Finally, the Inspector<sup>21</sup> states that:

“The Plan complies with all other relevant legal requirements, including the 2004 Act (as amended) and the 2012 Regulations.” He therefore goes onto

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<sup>18</sup> See paragraph 28 of the Inspector’s report

<sup>19</sup> See paragraph 30

<sup>20</sup> Paragraphs 30 - 31 of the Inspector’s report refer

<sup>21</sup> See paragraph 41 of the Inspector’s report

conclude (para 42) “that all relevant legal requirements have been complied with during the preparation of the Plan.

### Monitoring

6.13 Following the Plan’s adoption, in order to ensure implementation of the approach set out in the NLWP, progress made is to be monitored annually. Since the NLWP has been jointly produced, joint monitoring in conjunction with relevant stakeholders, is considered to be the best approach. Therefore, as stated in the Plan, the Borough Councils will publish a joint Annual Monitoring Report (AMR) on an annual basis as some key waste data used for monitoring is released annually.

6.14 The Borough Councils will undertake a comprehensive analysis that will highlight the performance of all policies and allocations and through the annual monitoring reporting will include recommended actions where targets are not met. This annual monitoring will also afford the opportunity to regularly review the NLWP policies, which will include assessment of the impact on people and groups listed in paragraph 1.7 above, including those who share one of the nine protected characteristics as defined by the Equality Act 2010. Further details on monitoring are set out in section seven of the main EqlA report.

6.15 The Inspector considers monitoring under Issue 7 of his report – namely whether the monitoring and implementation framework of the Plan will be effective. He concludes (para 195) that “subject to the recommended MMs, the monitoring and implementation framework is effective and provides a robust framework for monitoring the delivery of the Plan and is sound.”

## Conclusion

7.1 This EqIA addendum report, read in conjunction with the main EqIA report, outlines the approach, evidence and findings of the EqIA for the NLWP. Focussing on the impact of the Main Modifications (MMs) made to the Plan through the independent examination process, the assessment has considered equality legislation and the duty of the Borough Councils under the Equality Act 2010. The MMs will, taken together, help to secure a better geographical spread of waste management sites across the North London Borough Council area and also assist in the Councils' aim to achieve net self-sufficiency for the various waste streams.

7.2 The EqIA assessment has found that the NLWP to be adopted, as modified following the examination and receipt of the Inspector's report, does not have any disproportionate or differential negative impacts on any one group with protected characteristics.

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Report of: **Executive Member for Finance & Performance**

Meeting of	Date	Ward(s)
Council	3 <sup>rd</sup> March 2022	All

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### **SUBJECT: Update on the Local Authority External Audit Market & Appointment of External Auditors from 2023**

#### **1. Synopsis**

- 1.1. On the 16<sup>th</sup> December 2021, the Government published information on a new package of measures to support the improved timeliness of local audit. This set out the background to the deterioration in performance in hitting audit deadlines by local bodies and a series of actions which are designed to abate the decline.
- 1.2. On 22 September 2021 PSAA invited all eligible bodies to become opted-in authorities (for the purposes of External Auditor arrangements) for the five consecutive financial years commencing 1 April 2023 (the compulsory appointing period).
- 1.3. A decision to become an opted-in authority must be taken in accordance with the Regulations by the members of an authority meeting as a whole (Full Council).
- 1.4. All local government and police bodies will need to make a decision on the procurement method of their external audit arrangements for the period commencing from the financial year 2023/24 by Friday the 11<sup>th</sup> March 2022.
- 1.5. On the 31<sup>st</sup> January 2022 the Audit Committee agreed a recommendation to Full Council that approval is given to the submission of the form of acceptance notice to the PSAA to opt in to the national auditor appointment arrangements for the audit years 2023/2024 to 2027/2028.

- 1.6. This report seeks the approval of Full Council to 'opt in' to the arrangements as set out in **section 4**.

## **2. Recommendations**

- 2.1. To note the wider context in which the new appointment of External Auditors will be conducted within as set out in **section 3**.
- 2.2. To note that the considerations relevant to making a decision in relation to the appointment of its External Auditors from the financial year 2023/24 as set out in **section 4**.
- 2.3. To approve the submission of the form of acceptance notice to the PSAA to opt in to the national auditor appointment arrangements for the audit years 2023/2024 to 2027/2028 and delegate responsibility to the Section 151 officer to make the necessary arrangements.

## **3. Challenges in the local audit sector**

- 3.1. On the 16<sup>th</sup> December 2021, the government published a set of measures to improve the timeliness of local audits. Within this document they set out that their priorities for local audit are a strong and coordinated quality framework, a buoyant local audit market, and improved transparency and governance.
- 3.2. Local government audit plays a vital role in providing local authorities with accurate and reliable financial information to plan and manage their services and finances effectively. The timely completion of local audit also ensures local authority financial arrangements, including whether value for money is being achieved, are transparent to the taxpayer, and facilitates assurance for the public sector more broadly through the audit of the Whole of Government Accounts.
- 3.3. However, challenges remain around the timeliness of local audit which was one of the key issues highlighted by Sir Tony Redmond's [independent review](#) of local authority financial reporting and external audit. In 2017/18 the deadline for issuing audit opinions was brought forward from 30 September to 31 July. Since this point there has been a reduction in the number of local government audit opinions delivered on time, with significant reductions from 2018/19 onwards. This downward trend accelerated during the COVID-19 pandemic, with only 45% of 2019/20 audits completed by the extended deadline of 30 November 2020 and, most recently, only 9% of 2020/21 audits completed by the extended deadline of 30 September 2021. Islington Council's accounts were submitted to auditors during July 2021 and were signed off by the Auditors on the 2<sup>nd</sup> February 2022.
- 3.4. As the National Audit Office (NAO) outlined in its 2020 report [Timeliness of local auditor reporting on local government in England](#), a variety of complex factors are contributing to audit delays. Audit firms are struggling with a net loss of qualified staff, with many qualified accountants choosing to leave the audit sector entirely. For

auditors that are choosing to stay within the profession, alternative audit opportunities are often perceived as more attractive than local audit, which is contributing a high turnover of staff within firms.

- 3.5. In addition, increasing workload and regulatory pressure on auditors has contributed to further delays. The NAO found that the additional requirements of new International Financial Reporting Standards (IFRS), along with increased expectations from the Financial Reporting Council (FRC) following high-profile corporate failures such as Carillion and Patisserie Valerie, had combined to produce a significant increase in audit work, particularly on asset and pensions valuations. In some cases, issues with the preparation of local authority accounts have led to delays in audits being signed off.
- 3.6. The Finance Department within Islington has sought to secure additional resources to support the production of the accounts. It is the view of the NAO however, that some local authorities have diverted staff resources away from completing working papers and preparing accounts. In others, the quality of processes within the finance functions of some local authorities has affected their preparedness for audit. These issues, have, understandably, been exacerbated by the impact of the COVID-19 pandemic. From an Islington perspective, the unforeseen, additional and never before required work particularly in relation to valuations has been a significant factor in putting finance colleagues under strain.
- 3.7. Considering the complexity of the drivers behind audit delays, it is clear that a whole system response is needed, with local bodies, audit firms, regulatory bodies and code-setters needing to work collectively to implement solutions across the sector.
- 3.8. The government laid new regulations on 21 October 2021 to provide greater flexibility to the appointing person through, for example, extending the deadline for setting fee scales so that they can reflect the most recent market conditions, and streamlining the fee variation process under certain circumstances.
- 3.9. The government also provided £15 million of additional funding to local bodies for 2021/22 to support with the implementation of recommendations following the Redmond Review and the additional costs resulting from new audit requirements, including the new value for money reporting arrangements. In addition, the statutory deadline for publishing audited local authority accounts was extended to 30 September from 31 July from 2020/21 for 2 years.
- 3.10. At the [Local Audit Liaison Committee](#) meeting on the 21 September, it was noted by members that, while in the past, ensuring the quality of the final audit had been the priority, timeliness had worsened to the extent it had become a quality issue.
- 3.11. In response, a set of additional measures were committed to by government and other key stakeholders which were set out in the December 16<sup>th</sup> update. The sections of this update, together with the key commitments are set out below.

***Section 1: Measures relating to audit firms and timely completion of audit***

- Financial Reporting Council to publish updated Key Audit Partner guidance by spring 2022, including new routes for an experienced Registered Individual to become a Key Audit Partner
- Government to work with CIPFA to further develop the proposal for a new local audit training diploma in local government financial reporting and management aimed at different levels of auditor, and a new technical advisory service that could provide support to firms, and in particular new entrants

***Section 2: Measures relating to local bodies and quality of accounts preparation***

- DLUHC to provide further funding of £45 million over the course of next Spending Review period to support local bodies with the costs of strengthening their financial reporting, new burdens related to appointment of independent members and other Redmond recommendations and increased auditing requirements.
- CIPFA to publish strengthened guidance on audit committees by April 2022. The guidance will emphasise the role that audit committees should have in ensuring accounts are prepared to a high standard, alongside broader changes including appointment of independent members. Following consultation, consider making the guidance, committees and the independent member statutory
- DLUHC to provide via the Local Government Association a sector grant for a number of targeted training events for audit committee chairs

***Section 3: Proposed measures relating to accounting and audit requirements***

- National Audit Office (NAO) rolling over of amendments to allow for altering the timing of elements on the Value for Money arrangements work and enable more focus on fully delivering opinions on the financial statements
- CIPFA/LASAAC is undertaking a project to improve the presentation of local authority accounts to inform the development of the 22/23 Accounting Code and comply with International Financial Reporting Standards and statutory accounting principles
- HMT to undertake thematic review of financial reporting valuations for non-investment properties to inform development of the Accounting Code from 22/23 onwards
- The government has asked CIPFA/LASAAC to consider the merits of a time-limited change to the Accounting Code for 21/22
- Delaying implementation of standardised statements and associated audit requirements

***Section 4: Longer-term measures to help stabilise the market and address long-term supply issues***

- PSAA to progress their proposed procurement strategy for the next round of local audit contracts from 2023/24

- Extending the deadline for publishing audited local authority accounts to 30 November 2022 for 21/22 accounts and the 30 September date for 5 years from 2023/24 – 2027/28.
- NAO to prepare for a re-laying of the Code of Audit Practice 2020 in parliament, so that it will apply for the whole of the next appointing period
- Developing an industry-led workforce strategy, working with the system leader and audit firms, to consider the future pipeline of local audits, and associated questions related to training and qualifications

#### **4. Appointment of an External Auditor**

- 4.1. In July 2016, the Secretary of State specified PSAA as an appointing person for principal local government and police bodies for audits from 2018/19, under the provisions of the Local Audit and Accountability Act 2014 and the Local Audit (Appointing Person) Regulations 2015.
- 4.2. Acting in accordance with this role, PSAA is responsible for appointing auditors and setting scales of fees for relevant principal authorities that have chosen to opt into its national scheme, overseeing issues of auditor independence and monitoring compliance by the auditor with the contracts they enter into with the audit firms.
- 4.3. The previous procurement on behalf of more than 480 bodies (98% of those eligible to join the national scheme) was very successful, attracting very competitive bids from firms. As a result the PSAA were able to enter into long term contracts with five suitable firms and to make auditor appointments to all bodies.
- 4.4. That arrangement is coming to an end and once again the PSAA invited the Council to opt in, along with all other authorities, so that PSAA could enter into a number of contracts with appropriately qualified audit firms and appoint a suitable firm to be the Council's auditor.
- 4.5. The Council has three options, being 1) To undertake a complete procurement process itself and appoint its own auditor, or 2) Undertake a joint procurement with other bodies, or 3) To opt into a national collective scheme.
- 4.6. Section 3 of this report paints a picture of an audit industry under enormous pressure and of a local audit system which is experiencing its share of the strain and unavoidable instability as impacts cascade down to the frontline of individual audits.
- 4.7. Delayed opinions are not the only consequence of the FRC's drive to improve audit quality. Additional audit work must be paid for. As a result, many more fee variation claims have been received than in prior years. Within Islington, additional fees of £50,900 relating to changing audit requirements were proposed in Grant Thornton's 2020/21 Audit Plan, considered by Audit Committee in March 2021.

- 4.8. None of these problems are unique to local government audit. Similar challenges have played out throughout other sectors where increased fees and disappointing responses to tender invitations have been experienced during the past two years.
- 4.9. The PSAA believes the audit market will continue to be relatively unstable and difficult to predict for a further period of time as the Government continues to develop and implement its policy response to the four independent reviews – Kingman, CMA, Brydon, and Redmond; as further regulatory pressure is applied; and as firms respond and adapt. It is their view that organisations attempting to procure audit services of an appropriate quality during this period are likely to experience markedly greater challenges than pre-2018. There is little evidence to suggest a contrary view.
- 4.10. Local government audit will not be immune from these difficulties. It is the view of the PSAA that bodies which opt into PSAA’s national scheme will be in a better position than those which choose to make their own separate arrangements. This is on the presumption that firms are more likely to make positive decisions to bid for larger, long term contracts, offering secure income streams, than they are to invest in bidding for a multitude of individual opportunities.
- 4.11. The PSAA have led a sustained drive to improve the national scheme. During the past three years they have taken a number of initiatives to improve the operation of the scheme for the benefit of all parties including:
- proactively and constructively engaging with the numerous high-profile industry reviews, including the significant Redmond Review into Local Authority Financial Reporting and External Audit;
  - commissioning an independent review of the design and implementation of the appointing person role to help shape thinking about future arrangements;
  - commissioning an independent review of the sustainability of the local government audit market, which identified a number of distinctive challenges in the current local audit market;
  - working with DHULC to identify ways to address concerns about fees by developing a new approach to fee variations which would seek wherever possible to determine additional fees at a national level where changes in audit work apply to all or most opted-in bodies;
  - the establishment of a Local Audit Quality Forum;
  - using an advisory panel and attending meetings of the various Treasurers’ Societies and S151 officer meetings to share updates on their work, discuss audit-related developments, and listen to feedback;
  - maintaining contact with those registered audit firms that are not currently contracted with the PSAA, to build relationships and understand their thinking on working within the local audit market;
  - undertaking research to enable a better understanding of the outcomes of electors’ objections and statements of reasons issued since April 2015; and
  - sharing their experiences with and learning from other organisations that commission local audit services such as Audit Scotland, the NAO, and Crown Commercial Services.

## PSAA Auditor Procurement Process

- 4.12. The objectives of the PSAA procurement are to maximise value for local public bodies by:
- securing the delivery of independent audit services of the required quality (80:20 in favour of quality over price);
  - awarding long term contracts to a sufficient number of firms (estimated between 7-10 – up from the current 5) to enable the deployment of an appropriately qualified auditing team to every participating body;
  - encouraging existing suppliers to remain active participants in local audit and creating opportunities for new suppliers to enter the market;
  - encouraging audit suppliers to submit prices which are realistic in the context of the current market;
  - enabling auditor appointments which facilitate the efficient use of audit resources;
  - supporting and contributing to the efforts of audited bodies and auditors to improve the timeliness of audit opinion delivery; and
  - establishing arrangements that are able to evolve in response to changes to the local audit framework.
- 4.13. In the event that the procurement fails to attract sufficient capacity to enable auditor appointments to every opted-in body, there are fallback options to extend one or more existing contracts for the period spanning 2023/24 and 2024/25.
- 4.14. As set out previously in this report, one of the most concerning features of the local audit system since 2018 has been the large number of audit opinions which have been delayed beyond the target timetable set out in the Accounts & Audit Regulations, and the disruption and reputational damage that results for all parties as a result of those delays. The [NAO published a report](#) on this matter in March, 2021. The report concludes “The increase in late audit opinions, concerns about audit quality and doubts over audit firms’ willingness to continue to audit local authorities all highlight that the situation needs urgent attention. This will require cooperation and collaboration by all bodies involved in the local audit system, together with clear leadership from government.” To support the drive for market sustainability, PSAA are supporting the following options:
1. accepting consortia bids including those that involve firms which are seeking to enter the market by gaining experience working in partnership with an existing registered supplier;
  2. accepting bids from firms that are currently proceeding through the local audit registration process; and
  3. inclusion of one or two lots specifically aimed at seeking to encourage additional capacity into the market, mostly likely through some form of joint working arrangement between more experienced suppliers and new entrants or less experienced suppliers.

4.15. Additional costs may arise as an inevitable consequence of striving to bring new suppliers into the market. If additional costs were to occur, they would be borne by the scheme as a whole rather than by an individual audited body or a sub-set of bodies.

### Audit Pricing

- 4.16. Audit fees must ultimately be met by individual audited bodies. The prices submitted by bidders through the procurement will be the key determinant of the value of audit fees paid by opted-in bodies. Regardless of the additional costs incurred by local authorities as fee variations, the PSAA national scheme has reduced the costs of local audits significantly. The core audit fee for the Council was £270,440 in 2014/15 whereas the scale fee quoted in the 2020/21 Audit Plan is £156,179 - £114,000 less.
- 4.17. Additional fees (fee variations) are part of the legal framework. They only occur if auditors are required to do substantially more work than anticipated, for example, if local circumstances or the Code of Audit Practice change or if the Regulator (the FRC) increases its requirement on auditors.
- 4.18. If the changes that relate to audit fees, proposed in DLUHC's consultation on the Appointing Person Regulations, are ultimately approved and implemented, PSAA will be able to manage the scale of fees and fee variations more flexibly. This will enable scale fees to be determined taking into account the outcome of more recently completed audits, and fee variations to be managed differently depending on whether they are driven by national or local factors.
- 4.19. Within the national scheme the PSAA review and assess each fee variation proposal. This uses the knowledge and experience of their team in order to assess each submission, comparing with similar submissions in respect of other bodies/auditors before reaching a decision. Should the Council procure directly, this would fall upon our internal resources and expertise to undertake.
- 4.20. Audit developments since 2018 have focused considerable attention on audit fees. The drive to improve audit quality has created significant fee pressures as auditors have needed to extend their work to ensure compliance with increased regulatory requirements. Changes in audit scope and technical standards, such as the requirement in the new Code of Audit Practice 2020 for the auditor to provide a VFM arrangements commentary, have also had an impact.

### Summary of the options available

- 4.21. As a result of the position described in this report, the Council has three options:
1. To undertake a complete procurement process itself and appoint its own auditor, or
  2. Undertake a joint procurement with other bodies, or
  3. To opt into a national collective scheme that PSAA is developing.

- 4.22. The option to undertake an individual procurement provides the Council with the independence to select a supplier itself. However this will require the time, effort and skill of having to undertake a procurement and appointment process. It will also involve specifying the service required, inviting tenders, evaluating tenders. In addition a single procurement will lack the buying power to significantly influence quality and price.
- 4.23. There would also be a need to establish an independent auditor panel. In order to make a stand-alone appointment the auditor panel would need to be set up by the Council itself. The members of the panel must be wholly or a majority of independent members as defined by the Act. Independent members for this purpose are independent appointees, this excludes current and former elected members (or officers) and their close families and friends. This means that elected members will not have a majority input to assessing bids and choosing which audit firm to award a contract for the Council's external audit.
- 4.24. The option of a joint procurement with a small number of Councils exists. Whilst previously this option was superseded by the national collective arrangement attracting better economies of scale, it would give the authorities a more direct relationship with the audit firm and allow some pooling of costs and expertise. At this stage it is unclear whether many of our local neighbouring boroughs are likely or not to opt in to the PSAA collective arrangement and would thus be inclined to join a smaller local joint procurement.
- 4.25. The option to take advantage of the national collective scheme is beneficial to the Council for a number of reasons. Although the Council loses some influence on the final outcome and will gain from:
- PSAA will ensure the appointment of a suitably qualified and registered auditor and expects to be able to manage the appointments to allow for appropriate groupings and clusters of audits where bodies work together;
  - PSAA will monitor contract delivery and ensure compliance with contractual requirements, audit quality and independence requirements;
  - Any auditor conflicts at individual authorities would be managed by PSAA who would have a number of contracted firms to call upon;
  - It is expected that the large scale contracts procured through PSAA will bring economies of scale and attract keener prices from the market than a smaller scale competition;
  - The overall procurement costs would be expected to be lower than an individual smaller scale local procurement;
  - The overhead costs for managing the contracts will be minimised through a smaller number of large contracts across the sector;
  - There will be no need for the Council to establish alternative appointment processes locally, including the need to set up and manage an 'auditor panel', and;
  - A sustainable market for audit provision in the sector will be easier to ensure for the future.

## **5. Implications**

### **Financial Implications:**

- 5.1. The proposed fees cannot be fully known until the procurement process has been completed, as the costs will depend on proposals from the audit firms. Given the widespread prevalence of fee variations, market uncertainty and the revision to an 80% quality weighting within the procurement, it is almost certain that the fee payable by the Council will rise.
- 5.2. Opting-in to a national scheme provides a strong opportunity to ensure fees are as low as possible, whilst ensuring the quality of audit is maintained by entering in to a large scale collective procurement arrangement.
- 5.3. If the national scheme is not used some additional financial resource will be needed to establish an auditor panel and conduct a local procurement. Until a procurement exercise is completed it is not possible to state how much additional resource may be required for audit fees for 2023/24 however it is anticipated to be significant given the lack of purchasing power.
- 5.4. The scope of the audit will still be specified nationally, the National Audit Office (NAO) is responsible for writing the Code of Audit Practice which all firms appointed to carry out the Council's audit must follow. Not all audit firms will be eligible to compete for the work, they will need to demonstrate that they have the required skills and experience and be registered with a Registered Supervising Body approved by the Financial Reporting Council or bid under the proposed arrangements whereby those going through registration or being 'supervised' by an appropriate approved body would be eligible.

### **Legal Implications:**

- 5.5. Section 7 of the Local Audit and Accountability Act 2014 requires a relevant Council to appoint a local auditor to audit its accounts for a financial year not later than 31 December in the preceding year. Section 8 governs the procedure for appointment including that the Council must consult and take account of the advice of its auditor panel on the selection and appointment of a local auditor. Section 8 provides that where a relevant Council is a local Council operating executive arrangements, the function of appointing a local auditor to audit its accounts is not the responsibility of an executive of the Council under those arrangements;
- 5.6. Section 12 makes provision for the failure to appoint a local auditor: the Council must immediately inform the Secretary of State, who may direct the Council to appoint the auditor named in the direction or appoint a local auditor on behalf of the Council.
- 5.7. Section 17 gives the Secretary of State the power to make regulations in relation to an 'appointing person' specified by the Secretary of State. This power has been exercised in the Local Audit (Appointing Person) Regulations 2015 (SI 192) and this gives the Secretary of State the ability to enable a Sector Led Body to become the appointing person. In July 2016 the Secretary of State specified PSAA as the appointing person.

- 5.8. **Environmental Implications and contribution to net zero carbon by 2030.**  
There are no environmental impacts arising from this report.

**Resident Impact Assessment**

- 5.9. The council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding.
- 5.10. A resident impact assessment has not been carried out since the contents of this report relate to a purely administrative function and there are no direct impacts on residents.

**6. Conclusion and reasons for recommendations:**

- 6.1. Given the Council does not possess sufficient capacity and capability internally to run its own Auditor procurement exercise, the option to procure independently is discounted. Owing to the compelling financial and non-financial benefits of the collective purchasing arrangement together with the contract management benefits of utilising the PSAA, option 3 - To opt into a national collective scheme that PSAA is developing is the recommended method.

**Appendices:** None

**Background papers:** None

Final Report Clearance:

**Signed by:**



17 February 2022

Executive Member for Finance & Performance

Date

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**Report of: Executive Member for Finance & Performance**

<b>Meeting of</b>	<b>Date</b>	<b>Ward(s)</b>
Full Council	3 March 2022	All
Delete as appropriate	Exempt	Non-Exempt

## **Budget Proposals 2022/23 and Medium-Term Financial Strategy**

### **1. Synopsis**

- 1.1. The principal purpose of this report is for Full Council to agree, as recommended by the Executive, proposals in respect of the council's 2022/23 budget and level of council tax and the latest assumed medium-term financial position.
- 1.2. The COVID-19 crisis has had a massive impact on the council's work, and how it supports and delivers its services to residents and local people. Demand for services has risen sharply. The pandemic has also created opportunities for the council to work with communities, partner organisations and businesses to build back differently and realise our collective ambitions for the future.
- 1.3. The 2022/23 budget outlines how the council will continue to invest in innovative improvements to support these efforts. It also continues to safeguard investment in the services and support which people value and rely on.
- 1.4. Alongside this, the council is having to make new, ongoing savings of £3.53m in 2022/23, in addition to those previously agreed, with local government funding failing to keep up with rising costs and demand for council services.
- 1.5. The pandemic is expected to have a significant lasting impact on the council's budget. The sales, fees and charges income compensation scheme has now ended, and the government has indicated that there will be no additional COVID-19 funding for local authorities in 2022/23. This reinforces the need to have sufficient coverage in the council's base budget and reserves for hardening and emerging budget risks over the medium term and beyond.

- 1.6. The government has assumed in its local government funding calculations that, in 2022/23, the council will increase core council tax by the maximum amount (1.99%) and will apply a further 1% Adult Social Care (ASC) precept. This is reflected in the 2022/23 budget proposals. Subject to review as part of future budget setting cycles, the medium-term financial strategy (MTFS) also assumes core council tax increases of 1.99% in 2023/24 and 2024/25.
- 1.7. For the average (Band D) property, the total 2.99% increase in the basic Islington council tax (excluding the GLA precept) equates to an increase of around 73 pence per week for full council tax payers. Despite the proposed increase in council tax, working aged council tax support recipients living in a Band D property will pay around 82 pence per week less in 2022/23 due to the enhancement of the council tax support scheme.
- 1.8. The Mayor of London has published his final consolidated budget, capital spending plan and provisional council tax precept for 2022/23. The precept on Band D council taxpayers in the 32 London Boroughs is £395.59 - a £31.93 or 8.8% increase compared to this year. Combined with the proposed 2.99% increase in Islington council tax, this equates to a total increase of 4.27% for Islington council tax payers.
- 1.9. The Policy and Performance Scrutiny Committee reviewed the budget proposals on 20 January 2022 and its comments have been taken into account in finalising the budget proposals and the proposed level of council tax.
- 1.10. The council invited comments from business rates payers and representative of business rates payers in Islington on the draft 2022/23 budget proposals. The consultation period ran from 6 January 2022 to 26 January 2022. No comments were received.
- 1.11. The contents of the report are summarised below:
  - **Section 2** sets out the recommendations.
  - **Section 3** summarises the assumptions within the General Fund MTFS and sets out the 2022/23 net revenue budget, fees and charges and estimated reserves.
  - **Section 4** covers the Housing Revenue Account (HRA) and includes HRA rents, service charges and other fees and charges.
  - **Section 5** summarises the 2022/23 to 2024/25 capital programme and funding, and the latest indicative long-term programme up until 2031/32. The Capital Strategy, Treasury Management Strategy, Minimum Revenue Provision (MRP) Policy Statement and Investment Strategy are included as appendices.
  - **Section 6** includes the detailed, statutory council tax calculations and matters relating to retained business rates.
  - **Section 7** details the matters to formally consider in setting the final budget, namely the comments of the Section 151 Officer and the Monitoring Officer, a cumulative Equality Impact Assessment (EQIA) of the budget proposals and budget consultation requirements. It also includes the Annual Pay Policy Statement 2022/23.

## **2. Recommendations**

### **The General Fund Budget 2022/23 and MTFS (Section 3)**

- 2.1. To agree, as recommended by the Executive, the latest MTFS and balanced 2022/23 budget, including the underlying principles and assumptions. (**Paragraphs 3.1-3.36, Table 1 and Appendix A**)
- 2.2. To agree, as recommended by the Executive, the proposed 2022/23 net budgets by directorate. (**Paragraph 3.3, Table 2 and Appendix A**)
- 2.3. To agree, as recommended by the Executive, the 2022/23 savings and note that individual savings may be subject to individual consultation before they can be fully implemented. (**Paragraphs 3.37-3.41, Table 5, and Appendix B**)
- 2.4. To note the Dedicated Schools Grant (DSG) settlement for 2022/23 and related funding assumptions. (**Paragraphs 3.42-3.49**)
- 2.5. To note the fees and charges policy and the General Fund fees and charges for 2022/23 that have been approved by the Executive. (**Paragraphs 3.50-3.57 and Appendix C**)
- 2.6. To agree, as recommended by the Executive, the policy on General Fund contingency and reserves and agree the movements to/from earmarked reserves assumed as part of the 2022/23 revenue budget. (**Paragraphs 3.58-3.67, Table 6 and Table 7**)
- 2.7. To agree, as recommended by the Executive, that the Section 151 Officer is delegated responsibility for any technical adjustments required for the 2022/23 budget (in line with the council's Financial Regulations).
- 2.8. To agree, as recommended by the Executive, that centrally held gross demographic growth be allocated to service budgets only when the need materialises and as approved by the Section 151 Officer (**Paragraph 3.14**)

### **The HRA Budget and MTFS (Section 4)**

- 2.9. To agree, as recommended by the Executive, the balanced HRA 2022/23 budget and note the latest estimates over the three-year MTFS period. (**Paragraphs 4.1-4.3, Table 8 and Appendix D1**)
- 2.10. To note the HRA rents and to agree, following minor revisions to the version agreed by the Executive on 13 January 2022, the other HRA fees and charges for 2022/23. (**Paragraphs 4.4-4.29, Tables 9-11 and Appendix D2**)
- 2.11. To agree the introduction of a points-based apportionment method from April 2022 to revise the way in which Housing Leaseholder Service Charges are calculated. (**Paragraph 4.9, and Appendix D3**)
- 2.12. To note that the HRA 30-year business plan will be updated to reflect the impact of the latest rent setting proposals as well as other agreed increases in expenditure not previously anticipated. (**Paragraph 4.2**)

### **Capital Investment and Treasury and Investment Management (Section 5)**

- 2.13. To agree, as recommended by the Executive, the proposed 2022/23 to 2024/25 capital programme and note the indicative long-term capital programme for 2025/26 to 2031/32. (**Paragraphs 5.3, Table 12 and Appendix E1**)

- 2.14. To note the estimated funding of the 2022/23 to 2024/25 capital programme and to delegate authority to the Section 151 Officer, where necessary, to apply capital resources to fund the capital programme in the most cost-effective way for the council. (**Paragraph 5.10** and **Table 13**)
- 2.15. To agree, as recommended by the Executive, the Capital Strategy, Minimum Revenue Provision (MRP) Policy Statement, Treasury Management Strategy, and Investment Strategy. (**Paragraph 5.12** and **Appendices E2-E5**)

### **Council Tax and Retained Business Rates (Section 6)**

- 2.16. To note the 2021/22 council tax and business rates forecasts and budgetary impact over the medium term. (**Paragraph 6.1-6.3**)
- 2.17. To agree, as recommended by the Executive, the calculations required for the determination of the 2022/23 council tax requirement and the level of council tax as detailed in **Section 6** and summarised below.
  1. The 2022/23 council tax requirement of **£105,425,368.21** (**Paragraph 6.8** and **Table 15**)
  2. The relevant basic amount of Islington Band D council tax of £1,314.89, a 2.99% increase compared to 2021/22 (comprising 1% specifically for expenditure on adult social care and 1.99% for all expenditure), and that this is not 'excessive' in accordance with the council tax referendum principles for 2022/23. (**Paragraph 6.9** and **Table 16**)
  3. The basic amount of Islington Band D council tax for dwellings to which no special item relates (i.e. outside of the Lloyd Square Garden Committee area) of £1,314.65. (**Paragraph 6.11** and **Table 17**)
  4. The amount of 2021/22 council tax (excluding the GLA precept) for each valuation band over each of the council's areas. (**Paragraph 6.13** and **Table 18** and **Table 19**)
  5. The total amount of 2021/22 council tax (including the GLA precept) for each valuation band over each of the council's areas. (**Paragraph 6.15** and **Table 21** and **Table 22**)
- 2.18. To note the council's estimated retained business rates funding in 2022/23, as per the 2022/23 NNDR1 return estimate. (**Paragraph 6.17** and **Table 23**)
- 2.19. To note the council's forecast NNDR surplus/(deficit) in 2022/23. (**Paragraph 6.18** and **Table 24**)

## **Matter to Consider in Setting the Budget (Section 7)**

- 2.20. To have regard to the Section 151 Officer's report on the robustness of the estimates included in the budget and the adequacy of the proposed financial reserves when making decisions about the budget and the level of council tax, as required under Section 25(2) of the Local Government Act 2003. (**Paragraphs 7.1-7.7**)
- 2.21. To note the initial assessment of compliance against the CIPFA Financial Management Code and that this will be re-visited at least annually as part of the budget process, with any actions or recommendations implemented on an ongoing basis. (**Paragraph 7.5** and **Appendix F**).
- 2.22. To note the Monitoring Officer comments. (**Paragraphs 7.8-7.12**)
- 2.23. To note the Equality Impact Assessment (**Paragraphs 7.13-7.15** and **Appendix G**) and the requirement to consider it fully in approving the overall budget and related proposals.
- 2.24. To note that the council invited business rate payers or representatives of business rate payers in Islington to comment on the draft 2022/23 budget proposals, as required under Section 65 of the Local Government Finance Act 1992, and that no responses were received. (**Paragraphs 7.16-7.18**)
- 2.25. To agree, as recommended by the Executive, the Annual Pay Policy Statement 2022/23. (**Paragraph 7.19** and **Appendix H**)

### 3. General Fund MTFs and 2022/22 Revenue Budget

#### Summary of MTFs 2022/23 to 2024/25

3.1. The latest assumed budget position in 2022/23 and over the medium term is summarised in **Table 1** and detailed at **Appendix A**. There was an estimated gross budget gap of £11.583m in 2022/23 (balanced in full by the proposals in this report) and £55.756m over the medium term (with a remaining estimated three-year gap of £38.728m after the proposals and underlying assumptions in this report).

**Table 1 – Summary Budget Gap 2022/23 to 2024/25**

	<b>2022/23</b>	<b>2023/24</b>	<b>2024/25</b>	<b>Total</b>
	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>
Pay and pension inflation	9.830	8.850	4.860	23.540
Non-pay/contract inflation	5.879	4.350	4.350	14.579
Demographic growth	3.057	3.038	5.000	11.095
Corporate Items/Base budget adjustments	0.135	1.217	5.770	7.122
Investment growth	2.000	0.000	0.000	2.000
Government funding	(9.318)	6.738	0.000	(2.580)
<b>Gross Budget Gap</b>	<b>11.583</b>	<b>24.193</b>	<b>19.980</b>	<b>55.756</b>
Previously agreed savings	(3.246)	(0.540)	0.000	(3.786)
New savings proposals	(3.530)	(0.459)	0.000	(3.989)
Retained business rates income	(1.554)	1.554	0.000	0.000
Council tax income	(3.253)	(3.000)	(3.000)	(9.253)
<b>Net Budget Gap</b>	<b>(0.000)</b>	<b>21.748</b>	<b>16.980</b>	<b>38.728</b>

3.2. The proposed 2022/23 budget adheres to the following key principles.

- Compliance with the CIPFA Financial Management Code – this report includes a self-assessment of the council against the Code.
- Setting a balanced budget for the year ahead and working up robust estimates and funding scenarios over a three-year period, as well as longer-term horizon scanning.
- Fully budgeting for ongoing budget pressures, and not applying one-off funding to bridge ongoing funding gaps.
- Reflecting the ongoing revenue cost of the capital programme (both the cost of interest and prudently setting aside enough to repay debt principal) in the revenue budget, in particular considering the potential for interest rates to increase in the future.
- Not assuming additional funding from central government until it is confirmed and developing exit plans for specific funding streams ending at short notice.
- Increasing the level of council tax in line with the government’s expectations in local government finance settlements to avoid an ongoing shortfall in the base budget.
- Setting a sufficient contingency budget for in-year budget risks and using available one-off funding to strengthen financial resilience in reserves for hardening and emerging budget risks over the medium term.
- Maintaining a balance in the Core Funding Reserve to mitigate against a potential fall in retained business rates income.

## Net Revenue Budget 2022/23

3.3. **Table 2** summarises the proposed 2022/23 net revenue budget by directorate. A breakdown of the movement between the 2021/22 and 2022/23 budget is shown at **Appendix A**.

**Table 2 – Net Revenue Budget 2022/23**

	<b>2022/23 Net Budget £m</b>
Adult Social Services	56.769
Chief Executive's Directorate	1.228
Children's Services	84.966
Community Wealth Building	16.627
Environment	5.389
Fairer Together	7.112
Homes & Neighbourhoods	6.354
Public Health (net nil as wholly grant funded)	0.000
Resources Directorate and Central Costs	49.214
<b>Net Cost of Services</b>	<b>227.659</b>
Contingency	5.000
Transfer to/(from) Earmarked Reserves	(15.913)
Unringfenced Grants	(8.298)
<b>Net Budget Requirement</b>	<b>208.448</b>
Settlement Funding Assessment	(110.601)
Business Rates Growth	(15.183)
Collection Fund Deficit	22.761
<b>Council Tax Requirement</b>	<b>105.425</b>

## Economic Forecasts

- 3.4. The Office for Budget Responsibility's (OBR) latest economic forecasts, published alongside the Autumn Budget and Spending Review 2021, showed an improvement compared to the previous forecasts in March 2021. The successful vaccine rollout and consumers' and businesses' adaptability to public health restrictions has allowed faster than expected recovery. However, domestic and international markets have suffered from some supply constraints.
- 3.5. The economy is expected to grow by 6.5% in 2021 (2.4% higher than forecast in March 2021). Future year growth is forecast at 6.0% in 2022, 2.1% in 2023 and 1.3% in 2024.
- 3.6. Inflation (Consumer Price Index, CPI) was forecast to reach 4.4% in the second quarter of 2022 (2.6% higher than forecast in March 2021) and return to the government's 2% target in 2024. However, CPI has since surged to 5.5% in January 2022 (up from 5.4% in December 2021) and is forecast to peak at around 6% in April 2022.
- 3.7. The economy is expected to regain its pre-pandemic size by around the end of 2021 (previously mid 2022). Economic scarring from the pandemic is forecast at 2% (down from 3% in the March 2021 forecast).

- 3.8. Unemployment is now predicted to peak at 5.25% (1.25% less than forecast in March 2021). Vacancies have reached a record high of 1.1 million. However, the share of unemployed people who are classified as long-term unemployed has continued to rise and is now at a five-year high at almost 30% of the unemployed.
- 3.9. Lower borrowing over the forecast period means that public sector net debt is now forecast to peak below 100% of GDP at 98.2% this year.

### **Key Revenue Cost Pressures**

- 3.10. The MTFS assumes a 2% per annum pay award in 2021/22 and over the medium term. As the 2021/22 budget assumed a pay freeze (in line with government expectations at the time), the 2022/23 budget must make provision for both the 2021/22 and 2022/23 pay awards. Every 1% increase in pay equates to approximately £1.75m for the General Fund. It is possible that pay settlements could be higher than 2% with inflation now forecast to peak at 6% (and potentially higher) in 2022 and to be above the government's 2% target for most of the MTFS period.
- 3.11. As a result of the recently announced Health and Social Care reforms, there will be a 1.25% increase in employer National Insurance Contributions (NICs) from April 2022. This equates to a pressure of approximately £2m per annum on the council's General Fund employee costs of at least £2m per annum. There will be a further related pressure on ring-fenced areas of the council's budget such as the Housing Revenue Account (HRA) as well as on the council's contracts.
- 3.12. Employer pension contributions are expected to be broadly unchanged in 2022/23 based on the 2019 triennial pension fund valuation, with a stepped increase in costs expected in 2023/24 following the 2022 valuation. In addition, the MTFS includes £1m per annum additional provision from 2022/23 and over the medium term towards the historic pension fund deficit.
- 3.13. The MTFS provides for contract and non-pay inflation that cannot be managed within existing budgets. This includes the significant impact on adult social care contracts of the National Living Wage (from £8.91 to £9.50 per hour), London Living Wage (from £10.85 to £11.05 per hour) and National Insurance (1.25% increase) increases. It also includes provision for the potential impact of rising energy costs.
- 3.14. A further, significant cost pressure for the council is the increasing quantum and complexity of demand for council services. Based on latest estimates, the MTFS assumes demographic budget growth of £3.057m in 2022/23 and £11.095m over the medium term. This is the net growth requirement after planned management actions to mitigate cost increases. There is considerable uncertainty around these estimates due to the unknown lasting impact of the pandemic on demand. It is recommended that gross demographic growth is held centrally and allocated to service budgets in-year only when a more evidence-based assessment is available and has been approved by the Section 151 Officer.
- 3.15. The number of residents requiring adult social care has risen over the past number of years. This demand is driven by:
  - An ageing population with people living longer with multiple of complex needs requiring social care.

- Increased prevalence of learning disabilities or physical or mental illness among working-age adults over recent years.
  - The COVID-19 pandemic and related hospital discharge schemes have exacerbated this demand.
- 3.16. The demographic growth for Adult Social Services is split into the following client groups:
- Memory, Cognition, and Physical Support – It is estimated that approximately 8% of Islington’s population is aged over 65. Between 2017 and 2027 the Islington population aged over 65 is projected to rise by 27%.
  - Mental Health, Learning Disabilities and Physical Disabilities - People are living longer but are developing long-term conditions earlier in life. There are also a growing number of frail older family carers. Planning is necessary to meet the needs of an increasing number of people with profound and multiple disabilities and manage the resulting pressure on resources.
- 3.17. The demographic growth for Children’s Services relates to the following service areas:
- Demand pressures in relation to Children’s Social Care – Bed night activity increased by 10% during 2020/21. While it has partially subsided in the first half on 2021/22, underlying demand and cost pressures remain particularly in residential provision, independent living and fostering. Alongside this we are seeing increased numbers of care leavers as increasing numbers of children in care reach 18 years of age.
  - Increased provision of home to school transport as the numbers of pupils with special educational needs and disabilities continues to increase.
  - An increase in provision of school uniform grants and post-16 bursaries because of the eligibility for free school meals increasing during the pandemic.
- 3.18. The 2022/23 recurrent budget includes £2m for investment in Member priorities. This is summarised below.
- Expansion of the Council Tax Support Scheme (CTSS) (£0.676m) by increasing working-aged support from the current 91.5% to 95%, as agreed by Full Council on 9 December 2021.
  - Revenue cost of capital (£0.650m) associated with the new £10m capital investment pot to support key community priorities across the borough (see **Section 5**).
  - Enhanced Childcare Bursary Scheme (£0.120m) to extend the childcare bursary scheme to support an additional estimated 300 parents per annum.
  - Local Community Infrastructure Levy Top Ups (£0.050m) – The council currently operates a Community Infrastructure Levy (CIL) top-up scheme whereby those wards with negligible development, and therefore very low to zero local share CIL funding, receive a top-up of £0.03m per annum to support local infrastructure projects. The top-up value has not been increased for several years to reflect increasing costs, and it is proposed to increase the top-up to £0.075m per annum to allow all wards to deliver impactful projects and better meet local needs and priorities. Recurrent budget growth of £0.05m will be required each year going forward and reflects the estimated cost of this change in terms of reduced strategic share CIL funding and increased revenue cost of borrowing to fund the capital programme.

- Remaining amount of £0.554m to be allocated by the Executive during the financial year in accordance with the council's financial regulations.

3.19. The council is committed to paying levies to various external organisations, estimated to total £16.631m in 2022/23. The most significant levies are the council's contribution to Transport for London (TfL) for the cost of concessionary fares (London Freedom Pass) and the North London Waste Authority (NLWA) levy towards the disposal of household waste in partnership with six other north London boroughs.

3.20. The latest estimated levies for 2022/23 are shown in **Table 3**.

**Table 3 – Levies 2022/23**

	<b>2021/22 Budget £m</b>	<b>2022/23 Estimate £m</b>	<b>Increase/ (Decrease) £m</b>
Concessionary Fares	9.932	7.471	(2.461)
NLWA Household Levy	6.195	6.801	0.606
London Pensions Fund Authority	1.185	1.139	(0.046)
Inner North London Coroner's Court	0.360	0.367	0.007
Traffic and Control Liaison Committee	0.254	0.290	0.036
Lee Valley Regional Park Authority	0.194	0.190	(0.004)
Environment Agency (Thames Region)	0.190	0.189	(0.001)
London Boroughs Grants Scheme	0.180	0.184	0.004
<b>Total</b>	<b>18.490</b>	<b>16.631</b>	<b>(1.859)</b>

3.21. The overall decrease in the levies budgets is predominantly due to the further significant decrease in concessionary fares due to reduced passenger numbers on Transport for London (TfL) services since the start of the pandemic. The budget is forecast to return to its pre-pandemic level by 2024/25.

3.22. In order to help protect much-needed reserves, the 2022/23 base budget and MTFS additionally provides £1.5m per annum budget for corporate transformation projects.

### **Final Local Government Finance Settlement 2022/23**

3.23. The final local government finance settlement for 2022/23 was announced on 7 February 2022.

3.24. Based on the government's methodology, Islington's Core Spending Power (CSP) will increase by 6.57% in 2022/23 in cash terms, slightly less than the national average increase of 6.88%. This represents a real-term increase in resources of approximately 4%. Within this, it is assumed that the council will raise council tax by the maximum amount (1.99% referendum limit and 1% ASC precept).

3.25. Despite an increase in local government funding in 2022/23, this falls considerably short of rectifying government funding cuts to councils over the past decade. This is illustrated by the chart below. The chart shows the percentage change in core government spending (excluding COVID-19) by government department from 2009/10 to 2021/22. Local Government (within the Department for Levelling Up, Housing & Communities, previously named MHCLG) has been the most severely affected area with real-term funding cuts of around 60% since 2009/10.

Figure 5.4. Percentage change in departmental 'core' (non-virus) resource budgets, 2009–10 to 2021–22

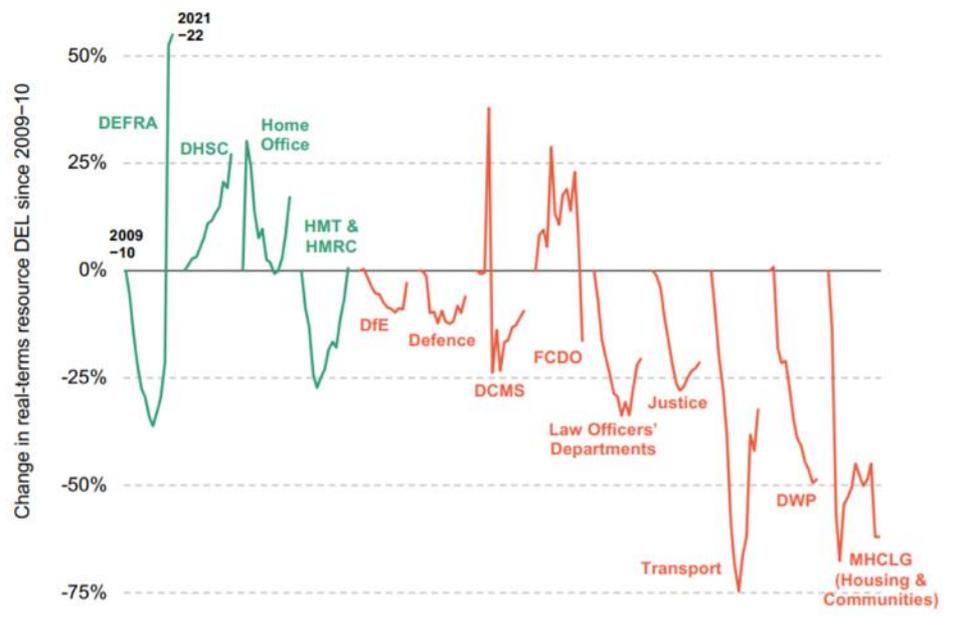


Chart referenced from: IFS Green Budget 2021 (<https://ifs.org.uk/uploads/IFS-Green-Budget-2021-.pdf>)

3.26. It was announced in the settlement that local government funding reform work is due to restart in spring 2022. This means that the Fair Funding Review (which Islington stood potentially to lose out from under a redistribution of local government funding) and business rates baseline reset are likely to be under consideration again, for possible implementation from 2023/24. This is a significant uncertainty in the MTFs going forward.

### ***Settlement Funding Assessment (SFA)***

3.27. Islington's SFA is made up of a Baseline Funding Level (BFL) under the partial (30%) business rates retention system (comprising a business rates baseline and a 'top-up' grant) and Revenue Support Grant (RSG). This is summarised in **Table 4** below.

**Table 4 – Settlement Funding Assessment (SFA)**

	<b>2021/22</b>	<b>2022/23</b>	<b>Increase/ (Decrease)</b>
Business Rates Baseline	82.456	82.456	0.000
Top-Up Grant	2.798	2.798	0.000
<b>Baseline Funding Level</b>	<b>85.254</b>	<b>85.254</b>	<b>0.000</b>
Revenue Support Grant	24.590	25.347	0.757
<b>Settlement Funding Assessment</b>	<b>109.844</b>	<b>110.601</b>	<b>0.757</b>

3.28. The BFL will be the same as in 2021/22 due to the previously announced freezing of business rates in 2022/23. The council will receive offsetting grant funding to compensate for the impact of the business rates freeze on its retained rates income.

3.29. In 2022/23, RSG will increase in line with the September 2020 to September 2021 change in the Consumer Price Index (CPI, 3.1%). The government also intends to roll into the RSG two small New Burdens grants (the Electoral Registration Grant and the Financial Transparency of Local Authority Maintained Schools Grant).

### ***Services Grant 2022/23***

- 3.30. Islington will receive £5.877m from the new, one-off 2022/23 Services Grant. As well as other immediate pressure in the sector, this is intended to fund the 1.25% increase in employer National Insurance Contributions (Health and Social Care Levy) in 2022/23.
- 3.31. The settlement makes clear that this grant is one-off in nature and that it will be excluded from potential transitional protections put in place to support local authorities when the assessment of council's needs, and resources is updated. Pending further clarity, it is assumed in the MTFS that the council will not continue to receive this additional funding in 2023/24 and 2024/25.

### ***Social Care Funding***

- 3.32. The council will receive social care grant funding of £29.060m in 2022/23, comprising £14.502m Improved Better Care Fund and £14.558m Social Care Grant. This is an increase of £3.781m compared to 2021/22.
- 3.33. In addition, the council will receive £0.868m in 2022/23 from the £162m Market Sustainability and Fair Cost of Care Fund (Social Care Reforms). The purpose of this grant (funded from the Health and Social Care Levy) is to support local authorities prepare markets for reform and move to paying providers a fair cost of care. There is a significant risk for local authorities that the overall quantum and distribution of funding for ASC reforms will be insufficient to meet the additional costs of implementing the reforms.

### ***New Homes Bonus (NHB)***

- 3.34. There will be a rollover of the 2021/22 policy on NHB for a new round of payments in 2022/23. These payments will not attract new legacy commitments. This equates to additional, one-off funding of £0.212m for Islington.

### ***Lower Tier Services Grant***

- 3.35. This was a new grant in 2021/22, the function of which appears to be to reduce the range of increases in Core Spending Power, largely by 'levelling up' those with the lowest taxbase, and to provide a 'floor' increase for every authority. Islington will receive £0.990m from the Local Tier Service Grant in 2022/23, an increase of £0.068m.

### ***Other Grants***

- 3.36. A number of other specific grants, including the ring-fenced Public Health grant and the former Independent Living Fund recipient grant, sit outside the main local government finance settlement and for which 2022/23 allocations have not yet been announced. The MTFS assumes that any changes in these specific grants compared to 2020/21 will have a neutral impact within the related service area.

### **Revenue Savings**

- 3.37. The 2022/23 revenue budget assumes the delivery of savings totalling £6.776m in 2022/23 (**Appendix B**) of which £3.530m are new savings proposals for agreement in this report and £3.246m are previously agreed from prior year budget setting processes. This is summarised by type of saving in **Table 5**.

**Table 5 – 2022/23 Budget Savings**

<b>Type</b>	<b>New Savings £m</b>	<b>Previously Agreed £m</b>	<b>Total £m</b>
Efficiency	1.350	1.035	<b>2.385</b>
Funding Substitution	0.500	0.000	<b>0.500</b>
Income	1.356	0.432	<b>1.788</b>
Service Reconfiguration	0.324	1.779	<b>2.103</b>
<b>Total</b>	<b>3.530</b>	<b>3.246</b>	<b>6.776</b>

- 3.38. It should be noted that individual savings may be subject to specific consultation before they can be implemented. In the event that any savings do not proceed as planned following consultation, any in-year pressure would need to be funded from the corporate contingency budget and the ongoing implications considered as part of the next budget process.
- 3.39. The proposed savings include the generation of additional property income of £0.84m in 2022/23. However, it should be noted that there is a significant in-year (2021/22) budget pressure on the existing property income budget. This suggests a high degree of risk around the delivery of the 2022/23 saving and a possible call on the contingency budget. This will be kept under close review and factored into future MTFs updates.
- 3.40. Updates on the delivery of the 2022/23 budget savings will be provided as part of the 2022/23 budget monitoring process.
- 3.41. The estimated future year implications of 2022/23 savings proposals in 2023/24 and 2024/25 are fully taken into account in the remaining medium-term budget gap in **Table 1**. These will be reviewed ahead of their inclusion in future year budget proposals.

### **Dedicated Schools Grant (DSG) Funding**

- 3.42. An additional £4.7bn is being provided by 2024/25 for the core schools budget in England compared to 2019/20. This is broadly equivalent to a cash increase of over £1,500 per-pupil by 2024/25, restoring schools' per-pupil funding to 2010 levels in real terms. However, this effectively means that there has been no real-term growth in per-pupil funding in a decade.
- 3.43. The DSG is split into four spending blocks: the Schools Block which funds mainstream schools via the schools funding formula; the Central Schools Services Block to fund services provided by the Council to all mainstream schools; the High Needs Block that funds provision for children and young people with special educational needs and disabilities; and the Early Years Block that funds statutory entitlements to early education and childcare.

### ***Schools Block***

- 3.44. In Islington the funding in the Schools Block is set to increase by £2.775m following an increase in per-pupil funding for primary and secondary schools of 2.86% and 2.59% respectively. However, as allocations at local authority level are on a per-pupil basis, the council would have received a further £1.211m if pupil numbers had been unchanged in 2021/22 (the basis of 2022/23 funding allocations) instead of declining. The increase in funding is sufficient to provide all schools with an increase in funding of at least 2% per pupil against pupil-led factors in the schools funding formula (the maximum allowable by the DfE).
- 3.45. In addition, supplementary funding is being provided for schools in 2022/23 to meet costs in relation to the Health and Social care Levy and wider costs. The provisional allocation for mainstream schools in Islington is £4m. This funding will be transferred into the DSG from 2023/24.

### ***Central Schools Services Block***

- 3.46. Islington will receive a further reduction of £106k (20%) in 2022/23 in the historic duties element of Central Schools Services Block funding for services provided to mainstream schools. This follows a 20% reduction in 2020/21 (£167k) and 2021/22 (£131k), in line with the Department for Education's (DfE) plans to phase out this funding for local authorities by 2026/27. Funding for ongoing duties is reducing by £18k (1.7%) due to declining pupil numbers and a 0.7% reduction in the per-pupil funding rate for local authorities.

### ***High Needs Block***

- 3.47. Funding for the High Needs Block is set to increase by £2.823m (7.5%) but is subject to confirmation by the government in the summer term, in line with previous years. In addition, supplementary high-needs funding is being provided to meet costs in relation to the Health and Social care Levy and wider costs. The provisional allocation for Islington is £1.5m. This funding is expected to be transferred into the DSG in 2022/23, a year earlier than for the Schools Block.

### ***Early Years Block***

- 3.48. Funding in the Early Years Block to fund statutory entitlements to early education and childcare is provisionally set to reduce by £1.555m (7.7%) in 2022/23 but will be adjusted in the summer term in line with the 2022 spring term early years census. Provisional allocations are based on the 2021 spring term headcount which was artificially suppressed due to the pandemic. In the normal course of events, we would expect some recovery in the data compared to 2021, and therefore a positive in-year funding adjustment. However, the Omicron variant is likely to have an adverse impact on recovery, therefore this remains a significant budget risk for the council and early years providers. Specific provisional funding adjustments within the Early Years Block are:
- The hourly funding rate for statutory entitlements to free early education and childcare for 2-year-olds is increasing by 3.2%, but the gain in funding has been offset by the reduced headcount.

- The Early Years Pupil Premium and The Disability Access Fund are increasing by £0.073m and £0.013m respectively, however this funding is passported directly to providers with eligible children.

3.49. In addition to the DSG, supplementary grant funding has been announced for schools in relation to the Health and Social Care Levy and to meet other cost pressures. The council has been notified of an indicative allocation of £4m for primary and secondary schools and £1.5m for high needs, including special schools. This funding is outside of the DSG for 2022/23 but is expected to be rolled into the DSG from 2023/24.

### **Fees and Charges**

3.50. Some fees and charges are prescribed by statute and are not within the council's power to vary locally; others are discretionary and set as part of the annual budget setting process.

3.51. In setting the fees and charges policy, consideration is given to the current level of inflation in the economy as well as the level of inflation expected to prevail over the forthcoming financial year.

3.52. The most widely used measure of inflation is the Consumer Price Index (CPI). Inflation is currently at its highest level in over a decade (January 2022 CPI – 5.5%). The spike in inflation is expected to be relatively short lived and forecast to return to the 2% target over the medium term.

3.53. Due to the unstable and short-term nature of the current rate of inflation, it is proposed that discretionary fees and charges are uplifted by 2% in 2022/23 (the government's official target rate) unless a variation is agreed.

3.54. Possible reasons for variation from the standard uplift include separate council policy, cost recovery, price elasticity of demand, benchmarking with alternative providers, and rounding for efficiency of collection.

3.55. Based on the policy, the General Fund discretionary fees and charges for 2022/23 are set out at **Appendix C1-4**.

3.56. Any increase in fees and charges income that has not already been included separately as part of the budget savings proposals will be fully factored into the overall budget planning assumptions for the relevant services to cover corresponding inflation in costs incurred by the council.

3.57. This policy also applies to HRA fees and charges, except for HRA rents that will be increased in line with the government rent standard (September CPI 3.1% + 1%). HRA fees and charges are considered in the **Section 4** of this report.

### **General Fund Contingency, Reserves and Balances**

3.58. A fundamental element of the robustness of the council's annual budget and MTFs is the level of contingency budget, earmarked reserves and General Fund balance, as determined by the Section 151 Officer.

3.59. Even prior to the COVID-19 crisis, the 2020/21 budget report had noted the need for the council to strengthen its financial resilience for budget risks over the medium term.

3.60. In recent years external auditors have highlighted the comparatively low levels of the council's non-schools reserves and emphasised the importance of maintaining sufficient

reserves. Furthermore, the significant expenditure pressures and income shortfalls incurred as a result of COVID-19 have highlighted the underlying level of risk in the council's budget.

- 3.61. The 2022/23 budget includes an ongoing corporate contingency budget of £5m per annum, unchanged from the 2021/22 budget. The contingency budget is available as a last resort for in-year contingency pressures that cannot be funded from compensating underspends elsewhere and subject to approval in line with the council's Financial Regulations. Directorates agree cash limited budget allocations and take responsibility for delivering a balanced budget unless a business case presenting an exceptional circumstance for contingency funding is agreed.
- 3.62. Islington's current General Fund balance (£16.7m, excluding balances held on behalf of schools) equates to just over one week of gross expenditure. It is proposed that any underspend on the General Fund and contingency budget at the end of each financial year is used to increase the General Fund balance (excluding schools balances) from the current level towards a target level of £40m over the medium to longer term. The £40m target level of General Fund balance (excluding schools balances) would be achievable by delivering a balanced budget over the next 5 years and transferring the unused contingency budget to general reserves. It is the view of the Section 151 Officer that this is a reasonable proxy, subject to annual review, for the level of unquantifiable risk in the council's budget, and therefore the target balance needed to deal with economic shocks and insulate the council from potential reactionary cuts to key services in the short term.
- 3.63. The government's financial assistance towards COVID-19 pressures has created complexities for reporting and for reserves comparisons between authorities and financial years. This is due to timing differences between when funding is received and when it is applied against budget pressures. The most significant impact is in respect of Section 31 grant compensation for COVID-19 business rates reliefs, where the grant income was received in 2020/21 (transferred to reserves) but the associated budget pressures will not come through until 2021/22 (drawn down from reserves) due to accounting regulations. This is the reason for the forecast decrease in the Core Funding reserve in 2021/22.
- 3.64. The estimated level of General Fund, reflecting current known movements, over the three-year MTFS period is shown in **Table 6** followed by a brief description of each reserve. This reflects known reserves movements and assumes that the estimated budget gap for 2023/24 and 2024/25 will be fully closed without drawing down on reserves.
- 3.65. The 2021/22 budget established a £4m per annum recurrent transfer to earmarked reserves as part of the council's efforts to strengthen financial resilience for hardening and emerging budget risks. It is prudently assumed that this £4m annual budgeted transfer to earmarked reserves will be offset fully by drawdowns against reserves commitments. However, the medium-term strategy will be to fund pressures within the annual base budget where possible, in which case the budgeted transfer to reserves may help towards further strengthening the overall reserves position.
- 3.66. The proposed 2022/23 budget includes a further one-off £4m transfer to earmarked reserves to provide additional financial resilience for the additional potential budgetary impact of the COVID-19 pandemic that is not reflected in base budgets.

3.67. It is expected that additional movements to/from reserves will be brought forward for agreement once there is greater clarity on their timing and amount. This includes reserves movements related to the finalisation of the 2021/22 financial outturn after the end of the current financial year.

**Table 6 – Estimated General Fund Reserves**

	<b>31.3.21 Actual £m</b>	<b>31.3.22 Estimate £m</b>	<b>31.3.23 Estimate £m</b>	<b>31.3.24 Estimate £m</b>	<b>31.3.25 Estimate £m</b>
<b>Earmarked Reserves</b>					
BSF PFI	5.762	6.405	6.935	7.439	7.929
Budget Risk and Insurance	25.425	27.697	23.697	23.697	23.697
Budget Strategy	21.111	21.111	21.111	21.111	21.111
Business Continuity	10.000	10.000	10.000	10.000	10.000
Care Experience	16.000	16.000	20.000	20.000	20.000
Cemeteries	2.107	2.107	2.107	2.107	2.107
CIL	8.434	8.434	8.434	8.434	8.434
Core Funding	41.465	39.677	16.916	15.337	15.337
COVID-19	0.000	0.000	4.000	4.000	4.000
Levies	0.000	2.726	2.983	2.983	2.983
Net Zero Carbon	2.548	2.548	2.548	2.548	2.548
Public Health	1.353	1.353	1.353	1.353	1.353
Social Care	5.985	5.985	5.985	5.985	5.985
Street Markets	0.260	0.260	0.260	0.260	0.260
<b>Total</b>	<b>140.450</b>	<b>144.303</b>	<b>126.329</b>	<b>125.254</b>	<b>125.744</b>
<b>General Fund Balance</b>					
Non Schools	16.664	16.664	16.664	16.664	16.664
Schools*	10.109	5.081	5.000	1.000	1.000
<b>Total</b>	<b>26.773</b>	<b>21.745</b>	<b>21.664</b>	<b>17.664</b>	<b>17.664</b>

- Building Schools for the Future (BSF) PFI Smoothing reserve – The annual costs of PFI schemes fluctuate over the lifecycle of the schemes. This reserve helps to smooth the budgetary impact of PFI costs across financial years.
- Budget Risk and Insurance reserve – to mitigate budget and insurance risks, the impact of delayed savings delivery and other timing differences and one-off expenditure commitments that span more than one financial year.
- Budget Strategy reserve – This reserve provides one-off funding linked to the delivery of the MTFS (e.g. transformation projects, revenue costs of capital projects, redundancy costs). It supplements the £1.5m annual budget for corporate transformation projects.
- Business Continuity - mitigates the risk of disruption to key council services and systems, including cyber security risks.

- Care Experience – provides for the potential direct and indirect costs of the non-recent child abuse (NRCA) support payment scheme. There is an additional £4m transfer to the reserve in 2022/23 in order to provide for the potential costs of the NRCA support scheme.
- Cemeteries reserve – The council operates a shared cemeteries service with the London Borough of Camden, and any surplus at the end of each financial year is carried forward through this reserve.
- Community Infrastructure Levy (CIL) reserve – balance of CIL funding available for infrastructure investment in future financial years.
- Core Funding – This reserve comprises the one-off financial gain from the former London Business Rates Pool and other one-off Collection Fund surpluses, and up-front government grant received in 2020/21 to fund 2020/21 Collection Fund losses that will come out of future year budgets (due to Collection Fund accounting timing differences). The remaining balance has been set aside for risks around taxation income and government funding streams. The individual forecast movements to/(from) the Core Funding reserve are detailed in **Table 7**.

**Table 7 – Movements to/(from) Core Funding Reserve**

	<b>2021/22</b>	<b>2022/23</b>	<b>2023/24</b>
	<b>£m</b>	<b>£m</b>	<b>£m</b>
<b>Council Tax</b>			
2019/20 Surplus/(Deficit)	0.589	0.000	0.000
2020/21 (Deficit) Spreading	(0.478)	(0.478)	(0.478)
2021/22 Surplus	0.000	1.566	0.000
<b>Business Rates</b>			
2019/20 Surplus/(Deficit)	1.192	0.000	0.000
2020/21 Surplus/(Deficit)	(22.838)	3.199	0.000
2020/21 (Deficit) Spreading	(1.101)	(1.101)	(1.101)
2021/22 Surplus/(Deficit)	0.000	(25.947)	0.000
Unbudgeted Section 31 Grant	20.848	0.000	0.000
<b>Total Movements</b>	<b>(1.788)</b>	<b>(22.761)</b>	<b>(1.579)</b>

- COVID-19 – The proposed 2022/23 budget includes a £4m one-off transfer to earmarked reserves to provide additional financial resilience against the ongoing impact of COVID-19 on the council's budget.
- Levies – mitigates future unexpected increases in levies (e.g. due to fluctuation in borough waste tonnages that are used to calculate the NLWA levy).
- Net Zero Carbon – supports the delivery of the council's Net Zero Carbon programme.
- Public Health – balance of ring-fenced public health grant funding carried forward to spend in future financial years.
- Social Care – mitigates significant uncertainty in social care demographic growth estimates, over and above the general, corporate demographic funding pot.
- Street Markets – The council operates three street markets at Chapel Market, Whitecross Street and Exmouth Market. Under laws governing the operation of these

markets, any surplus at the end of each financial year is carried forward through this reserve for the future costs of operating the markets.

#### **4. Housing Revenue Account**

- 4.1. The HRA is a ring-fenced account covering the cost of managing and maintaining council-owned housing stock, servicing both existing debt taken on as part of self-financing and new debt taken on to support the delivery of the new build programme, the funding of which comes primarily from rents and tenants' and leaseholders' service charges.
- 4.2. The HRA has a 30-year business plan that is currently balanced over the short to medium term. Work is currently underway to update the business plan to reflect the impact of the latest rent setting proposals as well as other agreed increases in expenditure not previously anticipated (e.g. the increase in employer national insurance). The outcome of this will determine the longer-term outlook and provide a basis for considering options for balancing the HRA in the longer term (if required) and meeting future investment need in relation to fire safety & net zero carbon priorities.
- 4.3. The proposed HRA budget for 2022/23 and latest estimates for the medium term, including HRA reserves estimates, is set out at **Appendix D1**. The movement between the approved 2021/22 budget and the proposed 2022/23 budget is summarised in **Table 8**.

**Table 8 – Summary of HRA Budget Changes 2021/22 to 2022/23**

	<b>£m</b>
<b>Expenditure</b>	
Staffing (estimated pay awards 2021/22 + 2022/23 & employers NI increase)	3.5
Net Reduction arising from PFI2 stock returning to council management	(22.2)
Reduction in temporary use of revenue contributions to fund capital spend	(26.2)
Increase in borrowing costs to fund capital expenditure	3.1
Increase in the cost of communal gas and electricity	2.2
Increase in the use of Temporary Accommodation arising primarily in response to domestic violence & disrepair	1.0
Budget growth	0.7
Contractual inflationary increases	1.2
Increase in tenants building Insurance costs	0.9
Increase in depreciation (contribution to the Major Repairs Reserve)	0.7
Increase in contingency to cover one-off pressures	1.7
Increase in the contribution to HRA reserves	8.6
<b>Total Expenditure Reduction</b>	<b>(24.8)</b>
<b>Income</b>	
Rent	(7.9)
Loss of PFI2 credits arising from PFI2 stock returning to council management	16.7
Tenant service charges	(1.0)
Heating charges (tenants & leaseholders)	(0.6)
Other income net reductions	0.4
Leaseholder service charges – re-aligning the budget to more closely align with actual costs & recovery	(1.4)
Reduction in contribution from HRA reserves	18.6
<b>Total Income Reduction</b>	<b>24.8</b>

## Rental Income and Other HRA Fees and Charges

- 4.4. The Welfare Reform and Work Act 2016 required local authorities to reduce the rents, in respect of all properties (excluding PFI managed properties) held in the HRA, by 1% each year for 4 consecutive years between 2016/17 and 2019/20.
- 4.5. In February 2019 the government issued a policy statement on rents for social housing effective from April 2020.
- 4.6. Compliance with this policy is effectively mandatory, as the government has included local authority social housing within the remit of the Social Housing Regulator (previously the Regulator's remit was limited to private registered providers of social housing i.e. housing associations). The Regulator is required by direction from the DLUHC to have regard to the government's policy statement referred to above. As such, the Regulator's rent standard, first published in May 2019 and updated in December 2020, reflects the government's policy statement.
- 4.7. The 2022/23 rents set out below have been calculated in accordance with the rent standard and the government's 'limit on annual rent increases 2022/23 (from April 2022)' issued in November 2021.
- 4.8. The Social Housing Regulator has advised that all properties that are currently or that were previously managed under a private finance initiative (PFI) arrangement are exempt from the rent standard.
- 4.9. The calculation of leaseholder service charges has been revised from a bedroom weighting method to a points-based method, as previously agreed by the Executive and detailed at **Appendix D3**.

## Islington Council Managed General Needs Non-New Build Properties

- 4.10. **Table 9** sets out the average rent in 2022/23 for existing tenancies. The maximum 2022/23 permitted rent is the prior year 2021/22 actual rent plus CPI 3.1% (September 2021) plus 1%.
- 4.11. However, if the maximum rent exceeds the lower of the 2022/23 national rent cap or the 2022/23 national target rent then 2022/23 rent will be the higher of A or B:
- A. The lower of 2022/23 national target rent or the 2022/23 national rent cap, or
- B. 2021/22 actual rent plus CPI 3.1% (September 2021) plus 0%.
- 4.12. All the Islington Council general needs properties will be subject to the maximum rent increase in 2022/23 of 4.1% (i.e. CPI 3.1% at September 2021 + 1%) as their maximum rent in 2022/23 does not exceed the lower of the 2022/23 national target rent or the 2022/23 national rent cap.
- 4.13. 1% (217) of the Islington Council general needs properties have a national target rent greater than the national rent cap.

**Table 9 – Existing Tenancies Average Weekly Rent 2022/23**

Average Weekly Rent 2021/22	£112.91
Increase (£)	£4.63
Increase (%)	4.10%
Average Weekly Rent 2022/23	£117.54

- 4.14. General needs properties will be re-let at the lower of the 2022/23 national rent cap or the 2022/23 national target rent. As 99% of Islington Council general needs properties have a national target rent below the national rent cap, it is likely that re-lets will be at national target rent.
- 4.15. In accordance with the rent standard, 2022/23 national target rents will reflect an increase of CPI 3.1% (September 2021) plus 1% and the 2022/23 national rent caps will reflect an increase of CPI 3.1% (September 2021) plus 1.5%.
- 4.16. **Table 10** sets out the likely average rent in 2022/23 for re-let properties.

**Table 10 – Re-Let Properties Likely Average Weekly Rent 2022/23**

Average Weekly National Target Rent 2021/22	£118.27
Increase (£)	£4.85
Increase (%)	4.10%
Average Weekly National Target Rent 2022/23	£123.12

**Islington Council Managed General Needs New Build Properties**

- 4.17. 2022/23 new build existing tenants’ rents will reflect an increase of CPI 3.1% (September 2021) plus 1%.
- 4.18. 2022/23 re-let and first-let new build rents will, like the LBI managed general needs stock, be based on the lower of the 2022/23 national rent cap or the 2022/23 national target rent.
- 4.19. 50% of existing new build national target rents are greater than the national rent cap, hence these re-let rents will be set at the national rent cap.

**Islington Council Managed Property Acquisitions used for Temporary Accommodation (including reception centres and general needs properties)**

- 4.20. Existing tenancies and re-let rents in 2022/23 will be set on the same basis as general needs properties referred to above, with the exception that for reception centres the plus 5% flexibility has been applied to the national target rent calculation.
- 4.21. LBI Managed Property Acquisitions - purchased using right to buy (1-for-1) receipts.
- 4.22. Existing Tenancies – 2022/23 rents will be set at the lower of:
- A. The 2021/22 rent plus CPI 3.1% (September 2021) plus 1%, or
  - B. The lower of the relevant 2022/23 local housing allowance rate or 80% of the relevant market rent.
- 4.23. Re-lets and first-lets in 2022/23 will be set at the lower of:
- A. The relevant 2022/23 local housing allowance rate, or
  - B. 80% of the relevant market rent

**Islington Council Managed Property Acquisitions (purchased Using GLA grant)**

- 4.24. Existing Tenancies – 2022/23 rents will be set at the lower of:
- A. The 2021/22 rent plus CPI 3.1% (September 2021) plus 1%, or
  - B. The relevant 2022/23 local housing allowance rate.

4.25. Re-lets and first-lets in 2022/23 will be set at the relevant 2022/23 local housing allowance rate.

**Properties Managed and Properties Previously (Until April 2022) Managed under a Private Finance Initiative (PFI) Contract by Partners for Islington**

4.26. The existing tenants’ 2022/23 rents will reflect an increase of CPI 3.1% (September 2021) plus 1% in respect of; properties that continue to be managed by Partners for Islington under the PFI (1) contract and properties returning to council management from 4th April 2022, that were previously managed by Partners for Islington under the PFI (2) contract.

4.27. Re-Lets will be based on the outgoing tenants’ rent as set out above.

4.28. **Table 11** sets out the average rent in 2022/23 for existing tenancies & likely average rent in 2022/23 for re-lets for current PFI (1) properties and ex PFI (2) properties.

**Table 11 – Existing Tenancies + Re-Lets – PFI (1) current contract and PFI (2) returning to council management - Average Weekly Rent 2022/23**

Average Weekly Rent 2021/22	£159.47
Increase (£)	£6.54
Increase (%)	4.10%
Average Weekly Rent 2022/23	£166.01

**Other HRA Fees and Charges**

4.29. All other HRA fees and charges are set out at **Appendix D2**. These will increase by 2% in line with the council’s policy set out in this report, except for the following charges:

- Caretaking/Cleaning and Estate Services  
Caretaking and Estate Service Charges will increase by 79p per week this is primarily due to the significant forecast increase in energy prices affecting the charge in respect of communal electricity.
- Digital TV Maintenance  
Charges have increased by 1p per week in 2022/23 to reflect the cost of the provision of this service.
- Heating and Hot Water  
Gas prices are forecast to increase by around 55% in 2022/23. The Tenants’ gas reserve has been used to absorb some of this increase and limit the increase in charges to tenants to +25%.
- Concierge Service Charges  
These have increased by 4.54% to reflect the phasing in of the recovery of the full costs related to the provision of this service.
- Estate Parking for Non HRA Rent and Service Charge payers  
Charges in respect of facilities used for vehicles i.e. garages, parking spaces and car cages have increased by 10% in 2022/23 for non-HRA residents.
- Diesel Surcharge (Off Street)

This charge has increased by £3 per year or 2.4% in 2022/23 to align with the on-street parking surcharge.

## **5. Capital Programme**

- 5.1. The council has a Corporate Asset Strategy that aims to take a strategic, long-term approach to managing and enhancing our community asset base.
- 5.2. The proposed capital programme continues the work over the past two years to implement this strategy by:
  - Providing significant investment to support key council priorities on affordable housing and net zero carbon.
  - Expanding the non-housing capital programme to support much-needed modernisation and enhancement of a wide range of community assets, including an additional one-off £10m capital investment.
  - Forecasting indicative capital investment needs over a longer time frame.
- 5.3. The proposed 2022/23 to 2024/25 capital programme as well as indicative estimates for 2025/26 to 2031/32 are summarised by council priority in **Table 12** and detailed at **Appendix E1**. This is estimated to deliver up to £1.7bn of capital investment in the borough over the next 10 years.
- 5.4. The capital expenditure profiles by financial year are based on latest best estimates by budget holders and project managers. In recent years, however, there has been significant in-year reprofiling of the capital programme to later financial years. This has been due to various internal and external factors such as significant uncertainty around timescales at the point of adding schemes to the programme, capacity constraints, COVID-19 restrictions and the global supply chain.
- 5.5. Despite plans to increase project manager capacity going forward, a central reprofiling assumption of 25% has been made against the total capital programme. The purpose of this is to highlight the expectation of further reprofiling in future updates of the capital programme.

**Table 12 – Capital Programme 2022/23 to 2024/25 and Indicative Programme 2025/26 to 2031/32**

	<b>2022/23</b>	<b>2023/24</b>	<b>2024/25</b>	<b>2022/23 to 2024/25 Total</b>	<b>2025/26 to 2031/32 (Indicative)</b>	<b>Total 10 Year Programme</b>
	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>
Corporate Landlord Service	19.721	17.273	19.917	<b>56.711</b>	41.682	<b>98.393</b>
Environment	25.481	27.147	20.804	73.432	89.500	<b>162.932</b>
Homes and Neighbourhoods	168.607	168.632	147.049	484.288	988.032	<b>1,472.320</b>
<b>Total Capital Programme</b>	<b>213.809</b>	<b>213.052</b>	<b>187.770</b>	<b>614.431</b>	<b>1,119.214</b>	<b>1,733.645</b>
25% Central Reprofitting Adjustment	(53.452)	(53.263)	(46.943)	(153.608)	(279.804)	<b>(433.411)</b>
<b>Adjusted Capital Programme</b>	<b>160.357</b>	<b>159.789</b>	<b>140.828</b>	<b>460.823</b>	<b>839.411</b>	<b>1,300.233</b>

5.6. The capital programme over the next three years will support the council’s objectives by providing funding for the following projects:

**Decent and Genuinely Affordable Homes for All:**

- Housing New Build Programme – the continuation of our major programme of investment in new social housing in Islington.
- Housing major works and improvements programme - ongoing investment in council homes and estates, including cyclical improvements, mechanical and electrical works, fire safety and energy efficiency improvements.
- New investment to support the redevelopment of Finsbury Leisure Centre, including over 100 new genuinely affordable homes.

**Children and Young People:**

- Improving our early years, schools, youth and play provision.

**A Safer Borough for All:**

- Upgrade to the council's core CCTV network and investment in CCTV-enabled vehicles to increase coverage for hot spots.

**A Greener and Cleaner Islington:**

- Continuing investment to support the council’s Net Zero Carbon strategy.
- Vehicle electrification charging infrastructure and replacement of vehicles.
- People Friendly Streets and School Streets – borough-wide programmes to reduce car trips and improve neighbourhoods for walking, cycling and living.
- Investment in the borough’s parks, open spaces and leisure facilities.

- 5.7. In addition to these programmes, the capital programme will support the effective management of Islington’s infrastructure and estate. This includes:
- Structural maintenance of the highways infrastructure including carriageways, footways and drainage.
  - Compliance and modernisation improvements to deal with urgent property compliance issues.
  - Use of Community Infrastructure Levy and S106 payments to make targeted investment across the borough spending decisions led and managed by local ward councillors.
- 5.8. The capital programme also includes a new £10m investment pot to support key community priorities across the borough. Officers will work with members to agree how the pot is used, which may include:
- Tackling urgent maintenance and improvement backlogs;
  - Providing top-up funding to ensure that in-flight schemes are completed or accelerated.
  - Delivering new schemes.
- 5.9. Further work will be required to allocate this additional capital investment pot and plan delivery timescales. Once this work has been completed, the proposed revised capital programme will be set out in a report to Full Council during 2022/23. In the meantime, the £10m additional capital budget is currently profiled equally between 2023/24 and 2024/25 given the lead time on delivering new schemes on top of the existing capital programme.
- 5.10. The estimated funding of the 2022/23 to 2024/25 capital programme is summarised in **Table 13**. At the end of each financial year, the Section 151 Officer will apply resources to finance capital expenditure in the most cost-effective way for the council.

**Table 13 – Estimated Funding of Capital Programme 2022/23 to 2024/25**

	<b>2022/23 £m</b>	<b>2023/24 £m</b>	<b>2024/25 £m</b>	<b>Total £m</b>
<b>General Fund</b>				
Capital Grant	3.701	5.400	5.650	<b>14.751</b>
S106/CIL	6.919	7.094	0.104	<b>14.117</b>
Capital Receipts	16.139	15.558	0.573	<b>32.270</b>
General Fund Borrowing	40.675	50.475	70.283	<b>161.263</b>
<b>Total General Fund</b>	<b>67.434</b>	<b>78.527</b>	<b>76.610</b>	<b>222.401</b>
<b>HRA</b>				
Capital Grant	5.725	0.000	0.000	<b>5.725</b>
S106/CIL	3.143	0.500	0.500	<b>4.143</b>
Capital Receipts	39.681	61.003	42.323	<b>143.007</b>
Revenue Contributions	5.694	8.669	16.506	<b>30.869</b>
HRA Reserves	32.357	33.159	28.232	<b>93.748</b>
HRA Borrowing	59.776	31.194	23.599	<b>114.569</b>
<b>Total HRA</b>	<b>146.376</b>	<b>134.525</b>	<b>111.160</b>	<b>392.061</b>
<b>Total Capital Programme</b>	<b>213.810</b>	<b>213.052</b>	<b>187.770</b>	<b>614.632</b>

5.11. It should be noted that the projected capital receipts financing is intrinsically linked with the housing new build capital programme, and that there is uncertainty around the timing and value of these receipts. To mitigate these risks the council maintains a regular review of the property market and has been prudent in its financial assumptions. Timing delays can largely be managed through the use of HRA reserves. In the event of a decrease in projected capital receipts, the new build programme would need to be re-assessed in line with the overall available funding.

5.12. The Capital Strategy that underpins the capital programme, and Treasury Management Strategy, MRP Statement and Investment Strategy are available at **Appendix E2-5**.

## **6. Council Tax and Retained Business Rates**

### **Council Tax Forecast 2021/22**

6.1. The latest 2021/22 Collection Fund forecast for council tax, which is subject to change between now and the end of the financial year, is a £0.795m surplus. This comprises a £1.839m COVID-19 related deficit brought forward from 2020/21 and a £2.634m in-year surplus.

6.2. The forecast in-year Collection Fund surplus of £2.634m is due to:

- Lower than budgeted council tax support costs of £5.327m – This is due to council tax support caseload stabilising and not increasing to the extent estimated at 2021/22 budget setting.

Partially offset by:

- An adverse net movement of £2.551m in the wider taxbase position – largely attributable to increased student exemptions and single person discounts.
- £0.142m payment to the council’s General Fund and the GLA in relation to the forecast Collection Fund surplus as part of 2021/22 budget setting in January 2021.

6.3. The distribution of the forecast Collection Fund surplus in the 2022/23 budget is outlined in **Table 14**. This is based on prescribed accounting requirements, including the three-year phasing of 2020/21 Exceptional (COVID-19) Deficits.

**Table 14 - Distribution of Forecast 2021/22 Council Tax (Surplus)/Deficit**

	<b>Islington £m</b>	<b>GLA £m</b>	<b>Total £m</b>
Total Forecast Surplus			0.795
Add back 1/3 2020/21 Exceptional Balance (2023/24 element due to three-year phasing)			0.608
<b>Total Surplus to be distributed in 2022/23</b>			<b>1.403</b>
1/3 of 2020/21 Exceptional Balance (2022/23 element due to three-year phasing)	(0.478)	(0.130)	(0.608)
Remainder of Surplus	1.566	0.446	2.012
<b>Total Surplus in 2022/23 Budget</b>	<b>1.088</b>	<b>0.316</b>	<b>1.403</b>

### Council Tax Base 2022/23

- 6.4. On 31 January 2022, the Audit Committee agreed a Band D equivalent council taxbase for 2022/23 of 80,177.9 properties for the council's whole area and 44.3 properties for the Lloyd Square Garden Committee area.
- 6.5. There is a headline council taxbase increase of 3.14% in 2022/23, recouping the majority of the 4.29% reduction experienced in 2021/22. The reasons for this increase are two-fold. Council tax support caseload has stabilised since the sharp increase at the start of the pandemic and has not increased to the extent estimated at 2021/22 budget setting. Also, council tax collection has marginally improved since the last financial year, albeit still below the pre-pandemic level.
- 6.6. The budgeted collection rate for 2022/23 is estimated at 97% (an increase of 0.5% from the 2021/22 rate of 96.5%). This is the percentage of 2022/23 council tax bills that the council is budgeting to receive over time, including in subsequent financial years. The 97% estimate is a judgment based on an incremental improvement in collection in the current financial year compared to 2020/21. However, council tax collection remains below the pre-pandemic level when the budgeted collection rate was 98%.
- 6.7. However, underlying this position, there is a 0.59% decrease in the council taxbase before changes in council tax support and collection losses are taken into account. This is predominantly due to a significant increase in student exemptions (with many students returning to student accommodation in the 2021/22 academic year) and growth in single person discounts over the past year. This will be monitored closely as part of 2022/23 budget monitoring in order to inform future year taxbase projections in the council's MTFS.

### Level of Council Tax 2022/23

- 6.8. Sections 31A and 31B of the amended Local Government Finance Act (LGFA) 1992 require the council to calculate its gross expenditure, gross income and council tax requirement. For these purposes, HRA expenditure and income is included even though it has no effect on council tax, and the gross expenditure figure includes special expenses relating to part only of the of the council's area. The calculation of the 2022/23 requirement is set out in **Table 15**.

**Table 15 – Section 31A (Amended LGFA 1992) Calculation 2022/23**

	<b>£</b>
Aggregate of the amounts which the council estimates for items set out in Section 31A (2) (a) to (f) of the LGFA 1992 <b>(A)</b>	£1,070,980,854.21
Aggregate of the amounts which the council estimates for items set out in Section 31A (3) (a) to (d) of the LGFA 1992 <b>(B)</b>	(£965,555,486.00)
Calculation of the council tax requirement under Section 31A (4), being the amount by which the sum aggregated at <b>(A)</b> above exceeds aggregate at <b>(B)</b> above	<b>£105,425,368.21</b>

- 6.9. The calculation of the relevant (average) 2022/23 council tax per Band D property is set out in **Table 16**.

**Table 16 – Section 31B (amended LGFA) Calculation 2022/23**

Council Tax Requirement	£105,425,368.21
Council Tax Base	80,177.9
<b>2022/23 Relevant Basic Band D Council Tax</b>	<b>£1,314.89</b>
<b>Increase Compared to 2021/22</b>	<b>2.99%</b>

- 6.10. Each billing authority and precepting authority must determine whether its relevant basic amount of council tax for a financial year is excessive. If an authority's relevant basic amount of council tax is excessive, a referendum must be held in relation to that amount. For 2022/23, the relevant basic amount of council tax for Islington would be excessive if it is 3% or more greater than 2021/22 (comprising 1% specifically for expenditure on adult social care, and 2% for all expenditure). Therefore, the proposed 2.99% increase in the relevant basic amount of Band D Islington council tax, which comprises 1% specifically for expenditure on adult social care and 1.99% for all expenditure, is not excessive.
- 6.11. Additional council tax calculations are required where special items relate to part only of the council's area (for Islington, the Lloyd Square Garden Committee special expense). The calculation of the 2022/23 basic amount of council tax for dwellings in Islington to which no special item relates (i.e. outside the Lloyd Square Garden Committee area) is shown in **Table 17**.

**Table 17 – 2022/23 Basic Council Tax for All Other Parts of the Council's Area**

Council Tax Requirement (Including special expenses)	<b>£105,425,368.21</b>
Less Lloyd Square Garden Committee special expense	(19,868.21)
<b>Council Tax Requirement (Excluding special expense)</b>	<b>£105,405,500.00</b>
Council Tax Base	80,177.9
<b>2022/23 Basic and D Council Tax for All Other Parts of the Council's Area</b>	<b>£1,314.65</b>
<b>Increase Compared to 2021/22</b>	<b>2.99%</b>

- 6.12. The Lloyd Square Garden Committee has agreed a special expense of £19,868.21 for 2022/23 (an increase of 5% since 2021/22). When this is divided by the Lloyd Square Garden Committee Band D tax base (44.2), it gives a charge of £448.49 per Band D property for 2022/23. This will be charged to Lloyd Square Garden area dwellings in addition to the basic Islington Band D council tax of £1,314.65 for all other parts of the council's area.
- 6.13. The 2022/23 basic amount of Islington council tax for each valuation band for the Lloyd Square area (**Table 18**) and all other parts of the council's area (**Table 19**) are shown below. These amounts are calculated by multiplying the Band D council tax amount per property by the proportions set out in Section 5(1) of the LGFA 1992.

**Table 18 – Lloyd Square Garden Area Basic Islington Council Tax 2022/23**

Valuation Band	Lloyd Square Garden Area 2021/22 (£)	Lloyd Square Garden Area 2022/23 (£)	Lloyd Square Garden Area Increase (£)
A	285.40	298.99	13.59
B	332.97	348.83	15.86
C	380.53	398.66	18.13
<b>D</b>	<b>428.10</b>	<b>448.49</b>	<b>20.39</b>
E	523.23	548.15	24.92
F	618.37	647.82	29.45
G	713.50	747.48	33.98
H	856.20	896.98	40.78

**Table 19 – All Other Parts of the Council's Area Basic Islington Council Tax 2022/23**

Valuation Band	All Other Parts of the Council's Area 2021/22 (£)	All Other Parts of the Council's Area 2022/23 (£)	All Other Parts of the Council's Area Increase (£)
A	£850.99	876.43	£25.44
B	£992.82	1,022.51	£29.69
C	£1,134.65	1,168.58	£33.93
<b>D</b>	<b>£1,276.48</b>	<b>1,314.65</b>	<b>£38.17</b>
E	£1,560.14	1,606.79	£46.65
F	£1,843.80	1,898.94	£55.14
G	£2,127.47	2,191.08	£63.61
H	£2,552.96	2,629.30	£76.34

6.14. The final 2022/23 GLA precept for each valuation band is shown in **Table 20**.

**Table 20 – GLA Precept**

Valuation Band	GLA Precept 2021/22 (£)	GLA Precept 2022/23 (£)	Increase (£)
A	£242.44	£263.73	£21.29
B	£282.85	£307.68	£24.83
C	£323.25	£351.64	£28.39
<b>D</b>	<b>£363.66</b>	<b>£395.59</b>	<b>£31.93</b>
E	£444.47	£483.50	£39.03
F	£525.29	£571.41	£46.12
G	£606.10	£659.32	£53.22
H	£727.32	£791.18	£63.86

6.15. The 2022/23 total amount of Islington council tax (including GLA precept) for each valuation band for the Lloyd Square area (**Table 21**) and all other parts of the council's area (**Table 22**).

**Table 21 – Total Islington and GLA Council Tax for the Lloyd Square Garden Area 2022/23**

Valuation Band	Lloyd Square Garden Area 2021/22 (£)	Lloyd Square Garden Area 2022/23 (£)	Lloyd Square Garden Area Increase (£)
A	1,378.83	1,439.15	£60.32
B	1,608.64	1,679.02	£70.38
C	1,838.43	1,918.88	£80.45
<b>D</b>	<b>2,068.24</b>	<b>2,158.73</b>	<b>£90.49</b>
E	2,527.84	2,638.44	£110.60
F	2,987.46	3,118.17	£130.71
G	3,447.07	3,597.88	£150.81
H	4,136.48	4,317.46	£180.98

**Table 22 – Total Islington and GLA Council Tax for All Other Parts of the Council's Area 2022/23**

Valuation Band	All Other Parts of the Council's Area 2021/22 (£)	All Other Parts of the Council's Area 2022/23 (£)	All Other Parts of the Council's Area Increase (£)
A	£1,093.43	1,140.16	£46.73
B	£1,275.67	1,330.19	£54.52
C	£1,457.90	1,520.22	£62.32
<b>D</b>	<b>£1,640.14</b>	<b>1,710.24</b>	<b>£70.10</b>
E	£2,004.61	2,090.29	£85.68
F	£2,369.09	2,470.35	£101.26
G	£2,733.57	2,850.40	£116.83
H	£3,280.28	3,420.48	£140.20

### Retained Business Rates

- 6.16. Under the existing business rates retention system, the council retains 30% of business rates income in the borough and receives Section 31 grant to compensate for the impact of government policy (e.g. new reliefs, freezing of business rates) on its retained business rates income.
- 6.17. The council's NNDR1 return (detailed business rates estimate) for 2022/23 has now been submitted following the 31 January 2022 statutory submission deadline. The financial implications of this return are fully incorporated in the proposed 2022/23 budget. **Table 23** summarise the NNDR1 return estimate in terms of the council's total retained business rates income.

**Table 23 – Estimated Business Rates Income 2022/23**

	<b>£</b>
Gross Business Rates	357,513,839
Small Business Rate Relief (net of additional yield from small business supplement)	(209,278)
Charitable Occupation	(25,966,295)
Unoccupied Property	(16,867,146)
Discretionary Reliefs	(1,198,719)
Discretionary Reliefs Funded by S31 Grant	(41,755,599)
<b>Net Business Rates Payable</b>	<b>271,516,802</b>
Estimated Bad Debts and Appeals	(24,948,655)
<b>Net Business Rates Less Reliefs and Losses</b>	<b>246,568,147</b>
Cost of Collection	(727,168)
Amount Retained for Renewable Energy Schemes	(79,268)
<b>NDR Income – Total</b>	<b>245,761,711</b>
<b>NDR Income – Islington (30% share)</b>	<b>73,728,513</b>
Plus: Section 31 Grant	23,545,737
<b>Total Retained Income – Islington</b>	<b>97,274,250</b>

6.18. The 2022/23 NNDR1 return also includes a forecast 2021/22 surplus/(deficit) on business rates income to be incorporated in the 2022/23 budget. This is summarised in **Table 24**. The 2022/23 budgetary impact of the council's share of this deficit will be fully offset by a transfer from the Core Funding reserve that has been earmarked for this purpose.

**Table 24 – Forecast NNDR Surplus/(Deficit)**

	<b>Total £</b>	<b>Islington 30% Share £</b>
Net 2021/22 Business Rates Income	221,626,761	66,488,028
Allowance for Non-Collection	(6,648,805)	(1,994,642)
Appeals Refunds and Provisions	(3,607,643)	(1,082,293)
Budgeted Demand based on 2021/22 Agreed Budget	(297,036,585)	(89,110,976)
Other Charges (e.g. cost of collection)	(823,073)	(246,922)
<b>Total 2021/22 Surplus/(Deficit)</b>	<b>(86,489,345)</b>	<b>(25,946,805)*</b>
Opening 2020/21 Surplus/(Deficit)	(73,993,217)	(22,197,965)
2021/22 Contribution towards Prior Year Deficit	77,314,613	23,194,384
Adjustment for Three-Year Phasing of 2020/21 Exceptional Balance (2023/24 Element)	3,671,089	1,101,327
<b>Total Surplus/(Deficit) in 2022/23 Budget</b>	<b>(79,496,860)</b>	<b>(23,849,058)</b>

*\*This 2021/22 Deficit of £25.947m (Islington share) is largely offset by £20.848m of forecast unbudgeted Section 31 grant receivable in 2021/22 to compensate for the impact of government reliefs. The overall forecast position on 2021/22 business rates, net of this timing difference, is therefore an underlying deficit of £5.099m.*

- 6.19. On 25 March 2021 the government announced a new COVID-19 Additional Relief Fund (CARF). CARF scheme guidance was published by the government on 15 December 2021 and £17,161,221 was allocated to Islington Council. The CARF scheme is intended to support those businesses affected by the pandemic but that, to date, have been ineligible for existing support linked to business rates. The council is responsible for designing the discretionary CARF scheme that will operate in its area and the Executive approved the proposed design of the discretionary scheme on 10 February 2022.
- 6.20. In the 2018 Budget, the government introduced a new relief scheme for retail properties and these 'retail relief' schemes have existed, albeit with some variations, since the 2019/20 financial year. The Executive approved the adoption of the Retail Relief scheme for 2022/23 and gave retrospective approval for the 2021/22 scheme on 10 February 2022.

## **7. Matters to Consider in Setting the Budget**

### **Comments of the Section 151 Officer**

- 7.1. This section contains the Section 151 Officer's comments on the robustness of the estimates included in the budget and the adequacy of the proposed financial reserves, as required under Section 25(1) of the Local Government Act 2003. Section 25(2) of the same Act requires the authority to have regard to this report of the Section 151 Officer when making decisions about the budget and the level of council tax.
- 7.2. Developing the budget estimates for a given financial year is an ongoing, iterative process within the medium-term financial planning cycle. This is a council-wide process involving all spending departments whereby estimates are work up, challenged and refined as further information becomes available. It takes into account the most recently available budget monitoring information and the latest assumptions for the forthcoming financial year. In particular, the proposed savings have been reviewed and signed off as deliverable by key stakeholders across the organisation. The thoroughness of this process is a key source of assurance in determining that overall estimates in the budget (including contingency) are robust and that financial reserves, whilst needing to be further strengthened, are adequate.
- 7.3. During the 2021/22 financial year the council's Policy and Performance Scrutiny Committee considered numerous reports and testimony in relation to the council's financial position as a result of COVID-19. This additional scrutiny gave the committee opportunity to consider lots of different evidence and viewpoints to better understand the decisions that have been made whilst also gaining a wider appreciation of the environment in which the council is operating. This additional level of scrutiny provides the Corporate Director of Resources with further assurance on the robustness of the 2022/23 budget estimates.

- 7.4. An initial compliance analysis against the CIPFA Financial Management Code has been undertaken as part of the 2022/23 budget assurance work. The CIPFA Financial Management Code applies a principle-based approach. It does not prescribe the financial management processes that local authorities should adopt. Instead, the CIPFA Financial Management Code requires that a local authority demonstrates that its processes satisfy the principles of good financial management for an authority of its size, responsibilities and circumstances. Each local authority should demonstrate that the requirements of the CIPFA Financial Management Code are being satisfied. Demonstrating this compliance with the CIPFA Financial Management Code is a collective responsibility of elected members, the Section 151 Officer and professional colleagues in the leadership team.
- 7.5. The initial compliance analysis is included at **Appendix F** and shows that the council achieves a high level of compliance against the vast majority of the CIPFA Financial Management Code statements of standard (or best) practice. Where there is only a medium level of compliance, actions are suggested that would take the council to high level. The compliance analysis should be seen as an organic piece of work, re-visited at least annually as part of the budget process, with any actions or recommendations implemented on an ongoing basis.
- 7.6. The medium-term local government funding outlook continues to be highly uncertain. The 2022/23 local government finance settlement is the fourth consecutive one-year settlement. It is largely a rollover of the 2021/22 settlement with additional, one-off funding to address immediate funding issues in the sector. In addition, there are potential government funding reforms on the horizon that could have a significant impact on funding levels, although there would be transitional protections.
- 7.7. The robustness of all assumptions, including delivery of savings, will next be reviewed in early spring 2022 in order to shape the new medium-term budget setting process from 2023/24 and estimated additional savings requirement. Given the unprecedented uncertainty and the lead-time in identifying and delivering savings, it is crucial that assumptions remain prudent in line with the MTFs principles set out in this report.

#### **Comments of the Monitoring Officer**

- 7.8. This report set out the basis upon which a recommendation will be made for the adoption of a lawful budget and the basis for the level of the council tax for 2022/23. It also outlines the council's current and anticipated financial circumstances, including matters relating to the General Fund budget and MTFs, the HRA, the capital programme and borrowing and expenditure control.
- 7.9. The setting of the budget and council tax by Members involves their consideration of choices. No genuine and reasonable options should be dismissed out-of-hand and Members must bear in mind their fiduciary duty to the council taxpayers of Islington.
- 7.10. Members must have adequate evidence on which to base their decisions on the level quality at which services should be provided. Where a service is provided pursuant to a statutory duty, it would not be lawful to fail to discharge it properly or abandon it, and where there is discretion as to how it is to be discharged, that discretion should be exercised reasonably.

- 7.11. The report sets out the relevant considerations for Members to consider during their deliberations and Members are reminded of the need to ignore irrelevant considerations. Members have a duty to seek to ensure that the council acts lawfully. They are under an obligation to produce a balanced budget and must not knowingly budget for a deficit. Members must not come to a decision which no reasonable authority could come to; balancing the nature, quality and level of services which they consider should be provided against the costs of providing such services
- 7.12. Under the constitutional arrangements, the setting of the council budget is a matter for the council, having considered recommendations made by the Executive. Before the final recommendations are made to the council, the Policy and Performance Scrutiny Committee must have been given the opportunity to scrutinise these proposals and the Executive should take into account its comments when making those recommendations.

### **Equalities Impact Assessment**

- 7.13. The council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (Section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding.
- 7.14. After more than a decade of significant budget savings, it is difficult to make new savings without any impact on residents. There will inevitably be some impact on particular groups, including those with protected characteristics as defined by the Equality Act. The council is not legally obligated to reject savings with negative impacts on any particular groups but must consider carefully and with rigour the impact of its proposals on the Public Sector Equality Duty, take a reasonable and proportionate view about the overall impact on particular groups and seek to mitigate negative impacts where possible.
- 7.15. The cumulative EQIA assessment of the budget proposals is set out at **Appendix G**. It is supplemented at a departmental level by detailed EQIAs of major proposals. These demonstrate that the council has met its duties under the Equality Act 2010 and has taken account of its duties under the Child Poverty Act 2010.

### **Budget Consultation**

- 7.16. Section 65 of the Local Government Finance Act 1992 requires the council to consult persons or bodies representative of business ratepayers about expenditure proposals.
- 7.17. The council must make available the information described in the Non-Domestic Ratepayers (Consultation) Regulations 1992/3171, including:
- Details of proposals for expenditure in the financial year to which the consultation relates.
  - Estimates of expenditure in the preceding financing year.
  - Particulars of significant changes in the level of proposed expenditure between the two years.

7.18. The council invited comments from business rates payers and representatives of business rates payers in Islington on the draft 2022/23 budget proposals. The consultation period ran for 21 days from 6 January 2022 to 26 January 2022. No responses were received.

### **Annual Pay Policy Statement**

7.19. Section 38 of the Localism Act 2011 requires local authorities to publish an annual 'Pay Policy Statement', setting out their policies in respect of chief officer remuneration and other specified matters. Regard must be had to guidance to be published by the Secretary of State in preparing the statement, which must be approved by Full Council. The council is then constrained by its pay policy statement when making determinations on chief officer pay, although the statement may be amended at any time by a further resolution of Full Council. The council's Annual Pay Policy Statement for 2022/23 is provided at **Appendix H**.

### **Appendices**

- Appendix A – General Fund Medium-Term Financial Strategy 2022/23 to 2024/25
- Appendix B – General Fund Proposed Savings 2022/23
- Appendix C1-4 – General Fund Fees and Charges 2022/23
- Appendix D1 – HRA MTFS 2022/23 to 2024/25
- Appendix D2 – HRA Fees and Charges 2022/23
- Appendix D3 – Leaseholder Service Charges Proposal
- Appendix E1 – Capital Programme 2022/23 to 2024/25 (and indicative 2025/26 to 2031/32)
- Appendix E2 – Capital Strategy 2022/23
- Appendix E3 – Investment Strategy 2022/23
- Appendix E4 – Minimum Revenue Provision (MRP) Policy Statement 2022/23
- Appendix E5 – Treasury Management Strategy 2022/23
- Appendix F – Initial Assessment of Compliance against CIPFA FM Code
- Appendix G – Budget Cumulative Equality Impact Assessment 2022/23
- Appendix H – Annual Pay Policy Statement 2022/23

Background papers: None

### **Signed by:**



23 February 2022

Executive Member for Finance and Performance

Date

Responsible Officers:

Dave Hodgkinson, Corporate Director of Resources (Section 151 Officer)

Paul Clarke, Director of Finance

Report Authors:

Martin Houston, Strategic Financial Advisor

Tony Watts, Head of Financial Planning

Legal Implications:

Peter Fehler, Director of Law and Governance (Monitoring Officer)

**Appendix A: Medium-Term Financial Strategy 2022/23 to 2024/25**

	2021/22	2022/23					2023/24					2024/25			
	Budget	Virements	Inflation / Growth	Adjustments	Savings	Budget	Inflation / Growth	Adjustments	Savings	Estimate	Inflation / Growth	Adjustments	Savings	Estimate	
	£m		£m	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m	
Adult Social Services	60.147	2.636	(0.455)	(4.106)	(1.453)	56.769	(2.562)		(0.050)	54.157	(0.650)			53.507	
Chief Executive's Directorate	1.277	(0.071)	0.022	0.000	0.000	1.228				1.228				1.228	
Children's Services	81.600	1.411	0.261	2.011	(0.317)	84.966		0.381	(0.019)	85.328				85.328	
Community Wealth Building	0.000	18.557	0.273	(0.823)	(1.380)	16.627			(0.075)	16.552				16.552	
Environment	10.475	(4.389)	0.934	0.545	(2.176)	5.389		0.113	(0.655)	4.847		(0.102)		4.745	
Fairer Together	0.000	6.830	0.074	0.308	(0.100)	7.112				7.112				7.112	
Homes & Neighbourhoods	9.027	(2.348)	0.300	(0.025)	(0.600)	6.354	(0.050)		(0.200)	6.104				6.104	
Public Health (net nil as wholly grant funded)	0.000	0.433	0.000	(0.183)	(0.250)	0.000				0.000				0.000	
Resources Directorate	41.474	(14.937)	0.425	1.796	(0.500)	28.258		0.247		28.505				28.505	
Central Costs (e.g. levies)	8.177	(8.122)	19.297	1.604	0.000	20.956	23.583	0.000	0.000	44.539	20.732	0.000	0.000	65.271	
<b>NET COST OF SERVICES</b>	<b>212.177</b>	<b>0.000</b>	<b>21.131</b>	<b>1.127</b>	<b>(6.776)</b>	<b>227.659</b>	<b>20.971</b>	<b>0.741</b>	<b>(0.999)</b>	<b>248.372</b>	<b>20.082</b>	<b>(0.102)</b>	<b>0.000</b>	<b>268.352</b>	
Contingency	5.000					5.000				5.000				5.000	
COVID-19 Contingency	5.500			(5.500)		0.000				0.000				0.000	
Transfer to/(from) Earmarked Reserves	(15.047)			(0.866)		(15.913)		16.925		1.012		1.579		2.591	
Transfer to/(from) General Balances	0.000					0.000				0.000				0.000	
New Homes Bonus Grant	(2.448)			1.587		(0.861)		0.861		0.000				0.000	
Local Council Tax Support Grant	(3.600)			3.600		0.000				0.000				0.000	
Local Tier Service Grant	(0.922)			(0.068)		(0.990)				(0.990)				(0.990)	
2022/23 Services Grant	0.000			(5.877)		(5.877)		5.877		0.000				0.000	
Council Tax Administration Grant	(0.570)					(0.570)				(0.570)				(0.570)	
<b>NET BUDGET REQUIREMENT</b>	<b>200.090</b>	<b>0.000</b>	<b>21.131</b>	<b>(5.997)</b>	<b>(6.776)</b>	<b>208.448</b>	<b>20.971</b>	<b>24.404</b>	<b>(0.999)</b>	<b>252.824</b>	<b>20.082</b>	<b>1.477</b>	<b>0.000</b>	<b>274.383</b>	
Revenue Support Grant	(24.594)			(0.753)		(25.347)				(25.347)				(25.347)	
Business Rates Baseline	(82.456)					(82.456)				(82.456)				(82.456)	
(Top-up) Tariff	(2.798)					(2.798)				(2.798)				(2.798)	
<b>SETTLEMENT FUNDING ASSESSMENT</b>	<b>(109.848)</b>	<b>0.000</b>	<b>0.000</b>	<b>(0.753)</b>	<b>0.000</b>	<b>(110.601)</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>(110.601)</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>(110.601)</b>	
Additional business rates related income	(13.629)			(1.554)		(15.183)		1.554		(13.629)				(13.629)	
Collection Fund (Surplus)/Deficit:															
- Business Rates	22.747			1.102		23.849		(22.748)		1.101		(1.101)		0.000	
- Council Tax	(0.111)			(0.977)		(1.088)		1.566		0.478		(0.478)		0.000	
<b>COUNCIL TAX REQUIREMENT</b>	<b>99.249</b>	<b>0.000</b>	<b>21.131</b>	<b>(8.179)</b>	<b>(6.776)</b>	<b>105.425</b>	<b>20.971</b>	<b>4.776</b>	<b>(0.999)</b>	<b>130.173</b>	<b>20.082</b>	<b>(0.102)</b>	<b>0.000</b>	<b>150.153</b>	

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## Appendix B: General Fund Proposed Savings 2022/23

Directorate	New or Continuation of Previously Agreed Saving?	Summary Description	2022/23 £m
Adult Social Services	New	Negotiate increased joint funded Physical Disability care packages	0.175
Adult Social Services	New	Increase the take-up of Shared Lives	0.100
Children's Services	New	Review management structure in Learning and Culture to deliver a saving equivalent to a vacant post	0.080
Children's Services	New	Reduce council contributions to Islington Safeguarding Children's Partnership (ISCP)	0.025
Children's Services	New	Reduced commissioning to roles that are not providing good value and/or where alternative provision exists	0.108
Children's Services	New	Restructure within Targeted Youth Support	0.026
Community Wealth Building	New	Additional procurement savings using existing delivery approach	0.250
Community Wealth Building	New	Corporate Landlord Services: Deliver resourcing and purchasing efficiencies through the consolidation and rationalisation of services	0.190
Environment	New	Greenspace and Street Environment Operations: Changes to how operational services are delivered, including moving Greenspaces operations to an area based model aligned to the village model introduced previously	0.200
Environment	New	Additional income in the Highways and Streetworks team based on current over-achievement of income target	0.200
Environment	New	Bunhill Heat & Power Network: Income generated from the sale of heat and electricity	0.061
Environment	New	Reduce bulk overtime and agency usage for weekend shifts in Street Operational Services, including the creation of 35 hour weeks to include weekend working	0.055
Environment	New	Review of measures to reduce vehicle emissions and improve air quality	0.134
Environment	New	Introduce new emissions charging to electronic parking vouchers by implementing a surcharge on petrol and diesel vehicles	0.686
Environment	New	Enforcement of environmental and highways offences	0.100
Environment	New	Operational changes to in-house compliance service, Street trading and evening / night time ASB services	0.070
Environment	New	Revise approach to Commercial Waste Services by withdrawing provision of commercial waste services outside of the borough	0.070
Homes & Neighbourhoods	New	Replacement of core council budget with additional Homeless Prevention Grant available to the service	0.500
Resources	New	Reduce bad/impaired debt through improvements to systems and processes	0.500
		<b>Subtotal New</b>	<b>3.530</b>
Adult Social Services	Continuation	Recommissioning of the 'low support' Housing Related Support services, moving towards a model of enhanced housing management	0.048
Adult Social Services	Continuation	Review and reduce the floating support service	0.053
Adult Social Services	Continuation	Review charging policy with a view to maximise income	0.027
Adult Social Services	Continuation	Package of savings through recommissioning of services	0.350
Adult Social Services	Continuation	In-house services transformation	0.700

## Appendix B: General Fund Proposed Savings 2022/23

Directorate	New or Continuation of Previously Agreed Saving?	Summary Description	2022/23 £m
Children's Services	Continuation	Investment in the House Project as a permanent service in Islington	0.078
Community Wealth Building	Continuation	Reduce the % of planning officer posts filled by agency staff	0.100
Community Wealth Building	Continuation	Savings resulting from a new property strategy, increasing income, more co-locating with partners and reducing the council's office footprint	0.840
Environment	Continuation	Capture illegal parking suspensions	0.030
Environment	Continuation	Street Works, Highways & Energy	0.100
Environment	Continuation	Create single team to support licensing, street trading, land charges, naming and numbering with automation through new back office system	0.060
Environment	Continuation	Divisional Development (Greenspace)	0.035
Environment	Continuation	Removal of parking machines over next 2 years	0.000
Environment	Continuation	Income generation from roll out of School Streets phase 2	0.375
Fairer Together	Continuation	VCS Partnership Grant Programme	0.100
Homes & Neighborhoods	Continuation	Temporary Accommodation	0.100
Public Health	Continuation	Health Visiting Transformation	0.100
Public Health	Continuation	Re-model substance misuse prescribing service	0.150
		<b>Subtotal Continuation of Previously Agreed</b>	<b>3.246</b>
		<b>Total New and Continuation of Previously Agreed</b>	<b>6.776</b>

**Appendix C1: Sales, Fees Charges 2022/23**

**Where VAT is applicable, all fees and charges noted are VAT exclusive, except where otherwise stated.**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Public Protection	Birth, Deaths, Marriages: License for Approved Premises		Annual	1,550.00	1,580.00	2%	
Environment	Public Protection	Birth, Deaths, Marriages: Licensed Venue External to Town Hall		Monday-Thursday (9am-5pm)	620.00	630.00	2%	
Environment	Public Protection	Birth, Deaths, Marriages: Licensed Venue External to Town Hall		Friday (9am - 5pm)		670.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Licensed Venue External to Town Hall		Saturday (9am - 5pm)	700.00	715.00	2%	
Environment	Public Protection	Birth, Deaths, Marriages: Licensed Venue External to Town Hall		Sunday (9am - 5pm)	800.00	815.00	2%	
Environment	Public Protection	Birth, Deaths, Marriages: Licensed Venue External to Town Hall		Bank Holiday (9am - 5pm)	800.00	815.00	2%	
Environment	Public Protection	Birth, Deaths, Marriages: Licensed Venue External to Town Hall		Out of Hours (5-10pm) Monday to Saturday	800.00	815.00	2%	
Environment	Public Protection	Birth, Deaths, Marriages: Licensed Venue External to Town Hall		Out of Hours (5-10pm) Sunday / Bank Holiday / Christmas Eve & New Years Eve	900.00	915.00	2%	
Environment	Public Protection	Birth, Deaths, Marriages: (Committe Room 1,2,3,4,5,6)	Marriage or Partnership Ceremony	Monday - Thursday (9am - 5pm)		410.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: (Committe Room 1,2,3,4,5,6)	Marriage or Partnership Ceremony	Friday (9am - 5pm)		460.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Richmond Room (Committe Room 1,2,3,4,5,6)	Marriage or Partnership Ceremony	Saturday (9am - 5pm)	500.00	510.00	2%	
Environment	Public Protection	Birth, Deaths, Marriages: Richmond Room (Committe Room 1,2,3,4,5,6)	Marriage or Partnership Ceremony	Sunday (9am - 5pm)		610.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Richmond Room (Committe Room 1,2,3,4,5,6)	Marriage or Partnership Ceremony	Out of Hours (5-10pm) Monday to Saturday		710.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Richmond Room (Committe Room 1,2,3,4,5,6)	Marriage or Partnership Ceremony	Out of Hours (5-10pm) Sunday / Bank Holiday / Christmas Eve & New Years Eve		810.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Richmond Room (Committe Room 1,2,3,4,5,6)	Wedding Reception (1 hour booking for 'First Toast')	Monday - Thursday (9am - 5pm)		150.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Richmond Room (Committe Room 1,2,3,4,5,6)	Wedding Reception (1 hour booking for 'First Toast')	Friday (9am - 6pm)		200.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Richmond Room (Committe Room 1,2,3,4,5,6)	Wedding Reception (1 hour booking for 'First Toast')	Saturday (9am - 7pm)		250.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Richmond Room (Committe Room 1,2,3,4,5,6)	Wedding Reception (1 hour booking for 'First Toast')	Sunday (9am - 5pm)		350.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Mayor's Parlour	Marriage or Partnership Ceremony	Monday - Thursday (9am - 5pm)	400.00	410.00	3%	Rounding for efficiency of collection
Environment	Public Protection	Birth, Deaths, Marriages: Mayor's Parlour	Marriage or Partnership Ceremony	Friday (9am - 5pm)		510.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Mayor's Parlour	Marriage or Partnership Ceremony	Saturday (9am - 5pm)	600.00	610.00	2%	
Environment	Public Protection	Birth, Deaths, Marriages: Mayor's Parlour	Marriage or Partnership Ceremony	Sunday (9am - 5pm)	700.00	710.00	1%	Rounding for efficiency of collection
Environment	Public Protection	Birth, Deaths, Marriages: Mayor's Parlour	Marriage or Partnership Ceremony	Out of Hours (5-10pm) Monday to Saturday		810.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Mayor's Parlour	Marriage or Partnership Ceremony	Out of Hours (5-10pm) Sunday / Bank Holiday / Christmas Eve & New Years Eve		910.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Room 99	Marriage or Partnership Ceremony	Monday - Thursday (9am - 5pm)	190.00	195.00	3%	Rounding for efficiency of collection
Environment	Public Protection	Birth, Deaths, Marriages: Room 99	Marriage or Partnership Ceremony	Friday (9am - 5pm)	240.00	245.00	2%	
Environment	Public Protection	Birth, Deaths, Marriages: Room 99	Marriage or Partnership Ceremony	Saturday (9am - 5pm)	290.00	295.00	2%	
Environment	Public Protection	Birth, Deaths, Marriages: Room 99	Marriage or Partnership Ceremony	Out of Hours (5-10pm) Monday to Saturday		395.00	NA	New Charge for 2022/23

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Public Protection	Birth, Deaths, Marriages: Room 99	Marriage or Partnership Ceremony	Out of Hours (5-10pm) Sunday / Bank Holiday / Christmas Eve & New Years Eve		495.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Council Chamber	Marriage, Civil Partnership, Renewal of vows or Naming Ceremonies	Monday - Thursday (9am - 5pm)	500.00	510.00	2%	
Environment	Public Protection	Birth, Deaths, Marriages: Council Chamber	Marriage, Civil Partnership, Renewal of vows or Naming Ceremonies	Friday (9am - 5pm)		610.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Council Chamber	Marriage, Civil Partnership, Renewal of vows or Naming Ceremonies	Saturday (9am - 5pm)	700.00	715.00	2%	
Environment	Public Protection	Birth, Deaths, Marriages: Council Chamber	Marriage, Civil Partnership, Renewal of vows or Naming Ceremonies	Sunday (9am - 5pm)	800.00	815.00	2%	
Environment	Public Protection	Birth, Deaths, Marriages: Council Chamber	Marriage, Civil Partnership, Renewal of vows or Naming Ceremonies	Out of Hours (5-10pm) Monday to Saturday		885.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Council Chamber	Marriage, Civil Partnership, Renewal of vows or Naming Ceremonies	Out of Hours (5-10pm) Sunday / Bank Holiday / Christmas Eve & New Years Eve		985.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Ceremony Suites (R01 & R04)	Marriage, Civil Partnership, Renewal of vows or Naming Ceremonies	Monday - Thursday (9am - 5pm)		250.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Ceremony Suites (R01 & R04)	Marriage, Civil Partnership, Renewal of vows or Naming Ceremonies	Friday (9am - 5pm)		300.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Ceremony Suites (R01 & R04)	Marriage, Civil Partnership, Renewal of vows or Naming Ceremonies	Saturday (9am - 5pm)		350.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Ceremony Suites (R01 & R04)	Marriage, Civil Partnership, Renewal of vows or Naming Ceremonies	Sunday (9am - 5pm)		450.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Ceremony Suites (R01 & R04)	Marriage, Civil Partnership, Renewal of vows or Naming Ceremonies	Out of Hours (5-10pm) Monday to Saturday		500.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Ceremony Suites (R01 & R04)	Marriage, Civil Partnership, Renewal of vows or Naming Ceremonies	Out of Hours (5-10pm) Sunday / Bank Holiday / Christmas Eve & New Years Eve		550.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Ceremony Suites (R01 & R04)	Preparation Room before ceremony (booking period 45 minutes)	Monday - Saturday		125.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Ceremony Suites (R01 & R04)	Preparation Room before ceremony (booking period 45 minutes)	Sunday / Bank Holiday / Christmas Eve & New Years Eve		195.00	NA	New Charge for 2022/23
Environment	Public Protection	Council Chamber, RM99, Mayors Parlour and Committee Room 1 - 6	Exclusive hire of Town Hall for wedding ceremony (3 hours) Basic	Sunday (9am - 6pm)		1,900.00	NA	New Charge for 2022/23
Environment	Public Protection	Council Chamber, RM99, Mayors Parlour and Committee Room 1 - 6	Exclusive hire of Town Hall for wedding ceremony (3 hours) Premium	Sunday (9am - 6pm)		2,900.00	NA	New Charge for 2022/23
Environment	Public Protection	Council Chamber, RM99, Mayors Parlour and Committee Room 1 - 6	Exclusive hire of Town Hall for wedding ceremony (3 hours) Out of Hours	Sunday / Bank Holiday / Christmas Eve & New Years Eve (6pm - 10pm)		3,900.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Births, deaths, marriages and civil partnership certificates	Family History search (pre 1980)	Based on 1 hour search		10.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Births, deaths, marriages and civil partnership certificates	Family History search (pre 1969)	Based on 2 hour search		25.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Private in person Citizenship Ceremony (Mon - Fri)		Per adult	125.00	125.00	0%	Benchmarking with alternative providers

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Public Protection	Birth, Deaths, Marriages: Private in person Citizenship Ceremony (Mon - Fri)		Per family	185.00	185.00	0%	Benchmarking with alternative providers
Environment	Public Protection	Birth, Deaths, Marriages: Private in person Citizenship Ceremony (Sat)		Per adult	155.00	155.00	0%	Benchmarking with alternative providers
Environment	Public Protection	Birth, Deaths, Marriages: Private in person Citizenship Ceremony (Sat)		Per family	230.00	230.00	0%	Benchmarking with alternative providers
Environment	Public Protection	Birth, Deaths, Marriages: Private in person Citizenship Ceremony (Mon-Fri)		Per adult		150.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Private in person Citizenship Ceremony (Mon-Fri)		Per family		200.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Private Virtual Citizenship Ceremony (Sat)		Per adult		175.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Private Virtual Citizenship Ceremony (Sat)		Per family		250.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Deaths, Marriages: Proof of life stamping		Per adult	10.00	10.00	0%	Cost Recovery
Environment	Public Protection	Document Certification Service		Per adult		10.00	NA	New Charge for 2022/23
Environment	Public Protection	Priority Services: Marriages & Civil Partnership Notices	Monday to Friday (after 5pm) and Saturdays (9am-5pm)	Per adult		10.00	NA	New Charge for 2022/23
Environment	Public Protection	Birth, Death, Marriages and Civil Partnership: Merchandise	Baby book, teddy bear, family history tree, ceremony folder, confetti etc	Per item		50% mark up	NA	New Charge for 2022/23
Community Wealth Building	Corporate Landlord	Assembly Hall - Commercial: Wedding celebration package		Any day	6,500.00	6,650.00	2%	
Community Wealth Building	Corporate Landlord	Assembly Hall - Commercial: Wedding dry hire package			3,700.00	3,775.00	2%	
Community Wealth Building	Corporate Landlord	Assembly Hall - Commercial: Live event hire for downstairs standing only			1,550.00	1,600.00	3%	Rounding for efficiency of collection
Community Wealth Building	Corporate Landlord	Assembly Hall - Commercial: Live event hire for full venue			1,750.00	1,800.00	3%	Rounding for efficiency of collection
Community Wealth Building	Corporate Landlord	Assembly Hall - Commercial: Venue Levy	Fee added to ticket price bought at Islington Assembly Hall via all ticket agents		1.00	1.00	0%	Rounding for efficiency of collection
Community Wealth Building	Corporate Landlord	Assembly Hall - Non-Commercial: Community and Charity			To be negotiated	To be negotiated	NA	NA
Children's Services	Early Years Meals	Meal charges during holiday childcare provision		Per day	2.00	2.20	10%	Cost Recovery
Children's Services	Children's & Community Centres	Term Time & Holidays - Under 2s	Band 1 (Up to £24,999)	Per Week	203.62	207.70	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - Under 2s	Band 2 (£25,000 - £30,999)	Per Week	215.47	219.78	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - Under 2s	Band 3 (£31,000 - £39,999)	Per Week	234.48	239.17	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - Under 2s	Band 4 (£40,000 - £49,999)	Per Week	259.84	265.04	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - Under 2s	Band 5 (£50,000 - £59,999)	Per Week	291.53	297.36	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - Under 2s	Band 6 (£60,000 - £69,999)	Per Week	329.55	336.14	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - Under 2s	Band 7 (£70,000 - £79,999)	Per Week	342.47	349.32	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - Under 2s	Band 8 (£80,000 - £89,999)	Per Week	402.72	410.77	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - Under 2s	Band 9 (£90,000 - £99,999)	Per Week	425.84	434.35	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - Under 2s	Band 10 (£100,000 - £120,000)	Per Week	433.69	442.36	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - Under 2s	Band 11 (above £120,000)	Per Week	458.29	467.45	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - Under 2s	Out of Borough/Marketed	Per Week	483.17	492.83	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - 2 to 3s	Band 1 (Up to £24,999)	Per Week	199.40	203.39	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - 2 to 3s	Band 2 (£25,000 - £30,999)	Per Week	211.25	215.47	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - 2 to 3s	Band 3 (£31,000 - £39,999)	Per Week	229.89	234.49	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - 2 to 3s	Band 4 (£40,000 - £49,999)	Per Week	254.75	259.84	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - 2 to 3s	Band 5 (£50,000 - £59,999)	Per Week	285.81	291.53	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - 2 to 3s	Band 6 (£60,000 - £69,999)	Per Week	323.09	329.55	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - 2 to 3s	Band 7 (£70,000 - £79,999)	Per Week	335.76	342.47	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - 2 to 3s	Band 8 (£80,000 - £89,999)	Per Week	366.10	373.42	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - 2 to 3s	Band 9 (£90,000 - £99,999)	Per Week	387.12	394.86	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - 2 to 3s	Band 10 (£100,000 - £120,000)	Per Week	394.25	402.14	2%	
Children's Services	Children's & Community Centres	Term Time & Holidays - 2 to 3s	Band 11 (above £120,000)	Per Week	416.62	424.95	2%	

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Children's Services	Children's & Community Centres	Term Time & Holidays - 2 to 3s	Out of Borough/Marketed	Per Week	439.23	448.02	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	Band 1 (Up to £24,999)	Per Week	139.74	142.53	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	Band 2 (£25,000 - £30,999)	Per Week	147.88	150.83	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	Band 3 (£31,000 - £39,999)	Per Week	160.92	164.14	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	Band 4 (£40,000 - £49,999)	Per Week	178.32	181.89	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	Band 5 (£50,000 - £59,999)	Per Week	200.07	204.07	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	Band 6 (£60,000 - £69,999)	Per Week	226.16	230.68	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	Band 7 (£70,000 - £79,999)	Per Week	235.03	239.73	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	Band 8 (£80,000 - £89,999)	Per Week	256.27	261.40	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	Band 9 (£90,000 - £99,999)	Per Week	270.98	276.40	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	Band 10 (£100,000 - £120,000)	Per Week	275.98	281.50	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	Band 11 (above £120,000)	Per Week	291.63	297.47	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 15 hrs free	Out of Borough/Marketed	Per Week	307.47	313.62	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	Band 1 (Up to £24,999)	Per Week	79.86	81.45	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	Band 2 (£25,000 - £30,999)	Per Week	84.51	86.20	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	Band 3 (£31,000 - £39,999)	Per Week	91.96	93.80	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	Band 4 (£40,000 - £49,999)	Per Week	101.90	103.94	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	Band 5 (£50,000 - £59,999)	Per Week	114.32	116.61	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	Band 6 (£60,000 - £69,999)	Per Week	129.23	131.82	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	Band 7 (£70,000 - £79,999)	Per Week	134.30	136.99	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	Band 8 (£80,000 - £89,999)	Per Week	146.45	149.37	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	Band 9 (£90,000 - £99,999)	Per Week	154.85	157.95	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	Band 10 (£100,000 - £120,000)	Per Week	157.71	160.86	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	Band 11 (above £120,000)	Per Week	166.65	169.99	2%	
Children's Services	Children's & Community Centres	Term Time - 3 & 4s - Entitled to 30 hrs free	Out of Borough/Marketed	Per Week	175.70	179.21	2%	
Children's Services	Children's & Community Centres	Holidays - 3 & 4s	Band 1 (Up to £24,999)	Per Week	159.70	162.89	2%	
Children's Services	Children's & Community Centres	Holidays - 3 & 4s	Band 2 (£25,000 - £30,999)	Per Week	169.00	172.38	2%	
Children's Services	Children's & Community Centres	Holidays - 3 & 4s	Band 3 (£31,000 - £39,999)	Per Week	183.91	187.59	2%	
Children's Services	Children's & Community Centres	Holidays - 3 & 4s	Band 4 (£40,000 - £49,999)	Per Week	203.80	207.87	2%	
Children's Services	Children's & Community Centres	Holidays - 3 & 4s	Band 5 (£50,000 - £59,999)	Per Week	228.65	233.22	2%	
Children's Services	Children's & Community Centres	Holidays - 3 & 4s	Band 6 (£60,000 - £69,999)	Per Week	258.48	263.65	2%	
Children's Services	Children's & Community Centres	Holidays - 3 & 4s	Band 7 (£70,000 - £79,999)	Per Week	268.61	273.98	2%	
Children's Services	Children's & Community Centres	Holidays - 3 & 4s	Band 8 (£80,000 - £89,999)	Per Week	292.88	298.74	2%	
Children's Services	Children's & Community Centres	Holidays - 3 & 4s	Band 9 (£90,000 - £99,999)	Per Week	309.69	315.88	2%	
Children's Services	Children's & Community Centres	Holidays - 3 & 4s	Band 10 (£100,000 - £120,000)	Per Week	315.40	321.71	2%	
Children's Services	Children's & Community Centres	Holidays - 3 & 4s	Band 11 (above £120,000)	Per Week	333.29	339.96	2%	
Children's Services	Children's & Community Centres	Holidays - 3 & 4s	Out of Borough/Marketed	Per Week	351.38	358.41	2%	
Children's Services	Library & Heritage Services	PC Printing		Per sheet	15p b/w 50p colour	15p b/w 50p colour	NA	NA
Children's Services	Library & Heritage Services	Genealogical Research		Per 30 minutes	15.00	15.30	2%	
Children's Services	Library & Heritage Services	Photocopying		Per sheet	15p A4 b/w; 20p A3 b/w; 50p A4 colour; £1 A3 colour	15p A4 b/w; 20p A3 b/w; 50p A4 colour; £1 A3 colour	NA	NA
Children's Services	Library & Heritage Services	Hall Lettings			£29 - £175 per hour	£29 - £175 per hour	NA	NA
Children's Services	Library & Heritage Services	Charges for Lost Items			Original purchase price	Original purchase price	NA	NA
Children's Services	Library & Heritage Services	Local History and Re-Sale Material Sales			Charge based on item being purchased and finish required	Charge based on item being purchased and finish required	NA	NA
Fairer Together	Telecare	Monitoring Service		Per week	3.83	3.91	2%	
Fairer Together	Telecare	Full Service		Per week	7.66	7.81	2%	
Fairer Together	Telecare	Peabody Trust	Alleyn House	Annual	6,435.00	6,563.70	2%	
Fairer Together	Telecare	Peabody Trust	Lampson House	Annual	4,680.00	4,773.60	2%	
Fairer Together	Telecare	Peabody Trust	Darwin Court	Annual	11,349.00	11,575.98	2%	
Fairer Together	Telecare	Peabody Trust	Davey Court	Annual	6,201.00	6,325.02	2%	

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Fairer Together	Telecare	Peabody Trust	Lomond House	Annual	6,903.00	7,041.06	2%	
Fairer Together	Telecare	Peabody Trust	Walston and Founders House	Annual	5,850.00	5,967.00	2%	
Fairer Together	Telecare	Peabody Trust	Elwood Court	Annual	7,137.00	7,279.74	2%	
Fairer Together	Telecare	Islington & Shoreditch		Annual	4,870.32	4,967.73	2%	
Fairer Together	Telecare	Barnsbury Housing		Annual	3,933.03	4,011.69	2%	
Resources	Law & Governance - Residential	RTB Lease Print (on grant of right to buy lease)			92.00	94.00	2%	
Resources	Law & Governance - Residential	Sealing fee (RTBs)			15.50	16.00	3%	Rounding for efficiency of collection
Resources	Law & Governance - Residential	Certificate of Compliance			260.00	265.00	2%	
Resources	Law & Governance - Residential	Release of Charge (DS1)			125.00	130.00	4%	Rounding for efficiency of collection
Resources	Law & Governance - Residential	Release of Restriction (RX1)			125.00	130.00	4%	Rounding for efficiency of collection
Resources	Law & Governance - Residential	Variation of Restrictions			310.00	315.00	2%	
Resources	Law & Governance - Residential	Memorandum of Staircasing			260.00	265.00	2%	
Resources	Law & Governance - Residential	Postponement of Charge			260.00	265.00	2%	
Resources	Law & Governance - Residential	Combined Standard Deeds of Variation & Licences to Alter			715.00	730.00	2%	Rounding for efficiency of collection
Resources	Law & Governance - Residential	Combined Other Deeds of Variation & Licences to Alter	e.g. loft space; works; change of lease plans		915.00	930.00	2%	
Resources	Law & Governance - Residential	Separate Deed of Variation			470.00	480.00	2%	
Resources	Law & Governance - Residential	Separate Licence to Alter			470.00	480.00	2%	
Resources	Law & Governance - Residential	Letter of Consent			370.00	380.00	3%	Rounding for efficiency of collection
Resources	Law & Governance - Residential	Deed of Covenant			100.00	102.00	2%	
Resources	Law & Governance - Residential	RTB Supplemental Lease			680.00	695.00	2%	
Resources	Law & Governance - Residential	Lease Extension			1,050.00	1,000.00	-5%	Benchmarking with alternative providers
Resources	Law & Governance - Residential	Freehold Enfranchisement (statutory or voluntary sales))			1,050.00	1,070.00	2%	
Resources	Law & Governance - Residential	Freehold Enfranchisement with Leaseback			1,380.00	1,410.00	2%	
Resources	Law & Governance - Commercial	Grant of new commercial lease		Minimum Charge	1,050.00	1,080.00	3%	Rounding for efficiency of collection
Resources	Law & Governance - Commercial	All licences and deeds	Assignment, alterations, rectification, subletting etc.	Minimum Charge	870.00	890.00	2%	
Resources	Law & Governance - Commercial	Notice of Charge/assignment			65.00	70.00	8%	Benchmarking with alternative providers
Resources	Law & Governance - Commercial	Notice to Complete			260.00	265.00	2%	
Adult Social Services	Adult Social Services	Meals in Day Care Centres			3.10	3.10	0%	Separate council policy
Adult Social Services	Adult Social Services	Deferred Payments		Set up fee	1,620.00	1,652.40	2%	
Adult Social Services	Adult Social Services	Deferred Payments		Annual	574.00	585.48	2%	
Adult Social Services	Adult Social Services	Deferred Payments	Complex case	Per hour	137.00	140.00	2%	
Adult Social Services	Adult Social Services	Deputyship		Annual management fee	Various fixed rates	Various fixed rates	NA	NA
Adult Social Services	Adult Social Services	Protection of Property		Admin Fee	394.00	402.00	2%	
Adult Social Services	Adult Social Services	Protection of Property		Per Hour	29.60	30.20	2%	
Adult Social Services	Adult Social Services	Protection of Property - Pets	Dog	Per Week	17.75	18.10	2%	
Adult Social Services	Adult Social Services	Protection of Property - Pets	Cat	Per Week	11.75	12.00	2%	
Adult Social Services	Adult Social Services	Community care charges			Individually assessed charge under Government regulations.	Individually assessed charge under Government regulations.	NA	NA

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Adult Social Services	Adult Social Services	Residential care charges			Individually assessed charge under Government regulations.	Individually assessed charge under Government regulations.	NA	NA
Homes & Neighbourhoods	Housing Needs & Strategy	Furniture Storage			156.00	159.12	2%	
Environment	Public Protection	Public Protection Officer		Per Hour	75.00	76.50	2%	
Environment	Public Protection	Charges for carrying out works in default following service of Notices		Per Case	Greatest of £250.00 or 30% of cost of works	Greatest of £250.00 or 30% of cost of works	NA	NA
Environment	Public Protection	Land Charges LA Searches	LLC1		27.00	27.54	2%	
Environment	Public Protection	Land Charges LA Searches	Con29R		107.00	109.14	2%	
Environment	Public Protection	Land Charges LA Searches	Enhanced Personal search		0.00	0.00	NA	NA
Environment	Public Protection	Land Charges LA Searches	Information search		58.00	59.16	2%	
Environment	Public Protection	Land Charges LA Searches	Personal inspection of the Local Land Charges Register under EIR		0.00	0.00	NA	NA
Environment	Public Protection	Land Charges LA Searches	Part 2 (Con29O) questions		12.00	12.24	2%	
Environment	Public Protection	Land Charges LA Searches	Part 3 (your own) questions		25.00	25.50	2%	
Environment	Public Protection	Land Charges LA Searches	Right of Light Registration		81.00	82.62	2%	
Environment	Public Protection	Land Search Enquiry		Per Reply Letter	71.00	72.42	2%	
Environment	Public Protection	Land Search Enquiry		Per Copy of Consent	1.00	1.02	2%	
Environment	Animal Services	Animal welfare service	Dog Recovery		32.15	32.79	2%	
Environment	Animal Services	Animal welfare service	Animal Rehoming		56.75	57.89	2%	
Environment	Animal Services	Animal welfare service	Animal Boarding		12.85	13.11	2%	
Environment	Animal Services	Animal welfare service	Register of Seized Dogs		4.50	4.59	2%	
Environment	Animal Services	The Animal Welfare (licensing of activities involving animals) (England) Regulations 2018	Animal Boarding Establishments	Licence	378.00	385.56	2%	
Environment	Animal Services	The Animal Welfare (licensing of activities involving animals) (England) Regulations 2018	Animal Boarding Establishments	Renewal	378.00	385.56	2%	
Environment	Animal Services	The Animal Welfare (licensing of activities involving animals) (England) Regulations 2018	Breeding Dogs	Licence	312.00	318.24	2%	
Environment	Animal Services	The Animal Welfare (licensing of activities involving animals) (England) Regulations 2018	Breeding Dogs	Renewal	312.00	318.24	2%	
Environment	Animal Services	Dangerous Wild Animals Act 1976	Dangerous Wild Animals	Licence	378.00	385.56	2%	
Environment	Animal Services	Dangerous Wild Animals Act 1976	Dangerous Wild Animals	Renewal	378.00	385.56	2%	
Environment	Animal Services	The Animal Welfare (licensing of activities involving animals) (England) Regulations 2018	Performing Animals	Registration	59.00	60.18	2%	
Environment	Animal Services	The Animal Welfare (licensing of activities involving animals) (England) Regulations 2018	Performing Animals	Copy Certificate	22.50	22.95	2%	
Environment	Animal Services	The Animal Welfare (licensing of activities involving animals) (England) Regulations 2018	Pet Animals	Licence	378.00	385.56	2%	
Environment	Animal Services	The Animal Welfare (licensing of activities involving animals) (England) Regulations 2018	Pet Animals	Renewal	378.00	385.56	2%	
Environment	Animal Services	The Animal Welfare (licensing of activities involving animals) (England) Regulations 2018	Riding Establishments	Licence	534.00	544.68	2%	
Environment	Animal Services	The Animal Welfare (licensing of activities involving animals) (England) Regulations 2018	Riding Establishments	Renewal	534.00	544.68	2%	
Environment	Pest Control	Pest Control	Contracted pest control treatments	Per Hour	191.00	194.82	2%	

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Residential Environmental Health	Notices Served and Orders - Housing Act 2004			658.00	671.16	2%	
Environment	Residential Environmental Health	Selective Licensing		5-Year	500.00	510.00	2%	
Environment	Residential Environmental Health	Selective Licensing	Accredited Landlord	5-Year	425.00	433.50	2%	
Environment	Residential Environmental Health	Selective Licensing	Additional for Assisted Application or Fast Track Application	5-Year	167.00	170.34	2%	
Environment	Residential Environmental Health	HMO Licensing		5-Year	288.00	293.76	2%	
Environment	Residential Environmental Health	HMO Licensing	Accredited Landlord	5-Year	245.00	249.90	2%	
Environment	Residential Environmental Health	HMO Licensing	Additional for Assisted Application or Fast Track Application	5-Year	352.00	359.04	2%	
Environment	Residential Environmental Health	HMO Licensing	Large Student Accomodation Block	5-Year	33.00	33.66	2%	
Environment	Residential Environmental Health	HMO Licensing - S257		5-Year	703.00	717.06	2%	
Environment	Residential Environmental Health	HMO Licensing - S257	Accredited Landlord	5-Year	597.00	608.94	2%	
Environment	Residential Environmental Health	HMO Licensing - S257	Additional for Assisted Application or Fast Track Application	5-Year	181.00	184.62	2%	
Environment	Commercial Environmental Health	Food Hygiene Re-rating		Per Hour	75.00	76.50	2%	
Environment	Trading Standards & Commercial Environmental Health	EH & TS Regulatory Services and Activities (including PAP)	Business and Primary Authority advice, general officer hourly rate for regulatory services and activities	Per Hour	76.50	78.03	2%	
Environment	Property Record Viewing	Solicitor's Enquiry	24 Hour Response	Per Property	137.00	139.74	2%	
Environment	Trading Standards & Street Trading	Mail Forwarding Business Registration	London Local Authorities Act 2007 (S75)		155.00	158.10	2%	
Environment	Trading Standards & Street Trading	Weights and Measures Inspector Testing Services	Testing, Reverification and Verification Services	Per hour, 9am-5pm Monday - Friday (1hr minimum charge)	100.00	102.00	2%	
Environment	Trading Standards & Street Trading	GLC General (Powers) Act 1984	Sale of Goods by Competitive Bidding		257.00	262.14	2%	
Environment	Trading Standards & Street Trading	Scrap Metal Dealers Act 2013	Scrap Metal Dealer - Site Licence	3 Years	570.00	581.40	2%	
Environment	Trading Standards & Street Trading	Scrap Metal Dealers Act 2013	Scrap Metal Dealer renewal		570.00	581.40	2%	
Environment	Trading Standards & Street Trading	Scrap Metal Dealers Act 2013	Scrap Metal Dealer variation		286.00	291.72	2%	
Environment	Trading Standards & Street Trading	Scrap Metal Dealers Act 2013	Scrap Metal Collector		343.00	349.86	2%	
Environment	Trading Standards & Street Trading	Scrap Metal Dealers Act 2013	Scrap Metal Collector renewal		343.00	349.86	2%	
Environment	Trading Standards & Street Trading	Scrap Metal Dealers Act 2013	Scrap Metal Collector variation		274.00	279.48	2%	
Environment	Trading Standards & Street Trading	Scrap Metal Dealers Act 2013	Duplicates for either		6.50	6.63	2%	
Environment	Tables, Chairs, Advertising Boards	Tables and Chairs	Processing Fee - New Application - All bands		805.00	821.10	2%	
Environment	Tables, Chairs, Advertising Boards	Tables and Chairs	Processing Fee - Renewal - All bands		450.00	459.00	2%	
Environment	Tables, Chairs, Advertising Boards	Tables and Chairs	Band A	Per Sq Metre	106.00	108.12	2%	
Environment	Tables, Chairs, Advertising Boards	Tables and Chairs	Band B	Per Sq Metre	71.50	72.93	2%	
Environment	Tables, Chairs, Advertising Boards	Tables and Chairs	Band C	Per Sq Metre	43.00	43.86	2%	
Environment	Tables, Chairs, Advertising Boards	A Boards, Tables and Chairs	Band A	Per A board added to existing Tables and Chair licence	308.00	314.16	2%	
Environment	Tables, Chairs, Advertising Boards	A Boards, Tables and Chairs	Band B	Per A board added to existing Tables and Chair licence	221.50	225.93	2%	
Environment	Tables, Chairs, Advertising Boards	A Boards, Tables and Chairs	Band C	Per A board added to existing Tables and Chair licence	90.00	91.80	2%	
Environment	Tables, Chairs, Advertising Boards	A Board Only	Band A	Per A board only	430.00	438.60	2%	
Environment	Tables, Chairs, Advertising Boards	A Board Only	Band B	Per A board only	308.00	314.16	2%	
Environment	Tables, Chairs, Advertising Boards	A Board Only	Band C	Per A board only	131.50	134.13	2%	

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Tables, Chairs, Advertising Boards	Other Fees	Non-refundable charge in cases of early determination of refusal of application		153.00	156.06	2%	
Environment	Tables, Chairs, Advertising Boards	Other Fees	Variation fee (additional A Boards or licensee/premise name change)		71.50	72.93	2%	
Environment	Gambling Act 2005	Bingo Club License Fees	New Application		2,076.00	2,117.52	2%	
Environment	Gambling Act 2005	Bingo Club License Fees	Annual Fee		1,061.00	1,082.22	2%	
Environment	Gambling Act 2005	Bingo Club License Fees	Variation		1,460.00	1,489.20	2%	
Environment	Gambling Act 2005	Bingo Club License Fees	Transfer		194.00	197.88	2%	
Environment	Gambling Act 2005	Bingo Club License Fees	Re-instatement		194.00	197.88	2%	
Environment	Gambling Act 2005	Bingo Club License Fees	Provisional Statement		2,080.00	2,121.60	2%	
Environment	Gambling Act 2005	Bingo Club License Fees	New Application from Provisional Statement holder		194.00	197.88	2%	
Environment	Gambling Act 2005	Betting Premises License Fees	Excluding Tracks - Re-instatement		194.00	197.88	2%	
Environment	Gambling Act 2005	Betting Premises License Fees	Excluding Tracks - New Application from Provisional Statement holder		194.00	197.88	2%	
Environment	Gambling Act 2005	Betting Premises License Fees	Excluding Tracks - Application for Provisional Statement		2,076.00	2,117.52	2%	
Environment	Gambling Act 2005	Betting Premises License Fees	Tracks - New Application		2,076.00	2,117.52	2%	
Environment	Gambling Act 2005	Betting Premises License Fees	Tracks - Transfer		444.00	452.88	2%	
Environment	Gambling Act 2005	Betting Premises License Fees	Tracks - Re-instatement		444.00	452.88	2%	
Environment	Gambling Act 2005	Betting Premises License Fees	Tracks - Provisional Statement		2,076.00	2,117.52	2%	
Environment	Gambling Act 2005	Betting Premises License Fees	Tracks - New Application from provisional statement holder		444.00	452.88	2%	
Environment	CCTV Enquiries	Request from Solicitors, Lawyers, Courts	DVD Single Camera footage		105.00	107.10	2%	
Environment	CCTV Enquiries	Request from Solicitors, Lawyers, Courts	DVD Multiple camera footage		130.50	133.11	2%	
Environment	Planning & Development	Research Fee	Admin Time	Per Hour	57.00	58.14	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Duty Planning Officer Slot		81.00	82.62	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Householder application (changes to a single house or flat)		292.00	297.84	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Householder application with site visit		474.00	483.48	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Householder follow up meeting		189.00	192.78	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Listed building consent		434.00	442.68	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Listed building consent with site visit		623.00	635.46	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Listed Building consent follow up meeting		216.00	220.32	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Small scale minor application with site visit		1,208.00	1,232.16	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Small scale minor follow up meeting		694.00	707.88	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Larger scale minor development (4-6 residential units, or 500-999 sq.m commercial) - 4a category		1,926.00	1,964.52	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Large scale minor follow up meeting (4-6) 4a		1,197.00	1,220.94	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Larger scale minor development (7-9 residential units, or 500-999 sq.m commercial) - 4b category		2,310.00	2,356.20	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Large scale minor follow up meeting (7-9) 4b		1,440.00	1,468.80	2%	
Environment	Planning & Development	Pre-Application & Other Advice	(5a) Major application: 10-20 residential units or 1000 to 1999sqm		8,335.00	8,501.70	2%	

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Planning & Development	Pre-Application & Other Advice	(5a) Major Applications follow up meeting		2,480.00	2,529.60	2%	
Environment	Planning & Development	Pre-Application & Other Advice	(5b) Major application >21 residential units <40 units or >2000sqm < 5000sqm commercial floorspace		10,935.00	11,153.70	2%	
Environment	Planning & Development	Pre-Application & Other Advice	(5b) Major application per extra meeting		5,470.00	5,579.40	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Planning Performance Agreement - (5a) Major application - Set up Fee only, extra charges for delivering an agreed programme		8,295.00	8,460.90	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Planning Performance Agreement - Major application (excluding 5a)		Bespoke	Bespoke		NA
Environment	Planning & Development	Pre-Application & Other Advice	Meeting charge to Discuss Non-Material Amendments to Major Development (s96a)		To be negotiated	To be negotiated		NA
Environment	Planning & Development	Pre-Application & Other Advice	Planning Performance Agreement (conditions)		Bespoke	Bespoke		NA
Environment	Planning & Development	Pre-Application & Other Advice	Planning Performance Agreement (s73) - for Major Developments		Bespoke	Bespoke		NA
Environment	Planning & Development	Pre-Application & Other Advice	Extensions of time - minor 4a		1,255.00	1,280.10	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Extensions of time - minor 4b		1,676.00	1,709.52	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Extension of times Majors (5a)		8,335.00	8,501.70	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Extension of times Majors (5b)		10,935.00	11,153.70	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Design review panel		4,430.00	4,518.60	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Design Review Panel (Second/Third Meeting)		3,400.00	3,468.00	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Officer research/ correspondence per hour		144.00	146.88	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Express Enforcement correspondence		658.00	671.16	2%	
Environment	Planning & Development	Pre-Application & Other Advice	Refund for returned invalid application		20% of application fee	20% of application fee		NA
Environment	Planning & Development	Pre-Application & Other Advice	Streetbook Surgeries		1,660.00	1,693.20	2%	
Environment	Building Control	Property Record Viewing, Photocopying	Enquiry Charge - all information readily available on back-office/land charges or statutory register	Per Property	112.50	114.75	2%	
Environment	Building Control	Property Record Viewing, Photocopying	Enquiry Charge - additional research required		112.50	114.75	2%	
Environment	Building Control	Property Record Viewing, Photocopying	Additional page/drawing		1.00	1.02	2%	
Environment	Building Control	Property Record Viewing, Photocopying	Each single copy of microfiche		11.50	11.73	2%	
Environment	Building Control	Property Record Viewing, Photocopying	Solicitor's enquiry (48 hour response)		306.00	312.12	2%	
Environment	Building Control	Temporary Structure	Renewal - Professional/Technical Time	Per Hour	112.50	114.75	2%	
Environment	Building Control	Temporary Structure	Renewal - Administrative Time	Per Hour	112.50	114.75	2%	
Environment	Building Control	Temporary Structure	Renewal - Demolition Notice	Standard Application	561.00	572.22	2%	
Environment	Building Control	Temporary Structure	Renewal - Demolition Notice	Complex Application	1,009.80	1,030.00	2%	
Environment	Building Control	Temporary Structure	New - Minimum Charge		350.00	357.00	2%	
Environment	Building Control	Dangerous Structure	Standard Charge on Issue of Notice		330.00	336.60	2%	
Environment	Building Control	Dangerous Structure	Site visits and Dealing with Matters	Per Hour	440.00	448.80	2%	
Environment	Building Control	Miscellaneous Charges	Refunds & Cancellations		115.00	117.30	2%	
Environment	Building Control	Miscellaneous Charges	Service Not Stated		On application	On application		NA
Environment	Public Protection	Street Naming or Numbering: New Site	1-9 units		215.00	219.30	2%	
Environment	Public Protection	Street Naming or Numbering: New Site	10-20 units		280.00	285.60	2%	

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Public Protection	Street Naming or Numbering: New Site	For each additional unit over 20		40.00	40.80	2%	
Environment	Building Control	Street Naming or Numbering: New Site	Naming a new street (including access ways, mews, cul-de-sacs)		0.00	0.00	NA	NA
Environment	Public Protection	Street Naming or Numbering: Existing Site	Renaming a street		465.00	474.30	2%	
Environment	Public Protection	Street Naming or Numbering: Existing Site	Naming or re-naming of a property		269.00	274.38	2%	
Environment	Public Protection	Street Naming or Numbering: Existing Site	Renumbering of a property		269.00	274.38	2%	
Environment	Building Control	Street Naming or Numbering: Existing Site	Postcode enquiries		0.00	0.00	NA	NA
Environment	Building Control	Street Naming or Numbering: Existing Site	Resubmission with new proposals if original application refused and within 1 month of refusal		0.00	0.00	NA	NA
Environment	Environmental Services - Highways	Enquiry from Solicitor, Developer, Business	Level 1 - Highway search - provide plan		52.00	53.00	2%	
Environment	Environmental Services - Highways	Enquiry from Solicitor, Developer, Business	Level 2 - Highway search plan & written response to 1 question		100.00	102.00	2%	
Environment	Environmental Services - Highways	Enquiry from Solicitor, Developer, Business	Level 3 - Highway Search plan and written response provided up to 5 questions		190.00	194.00	2%	
Environment	Environmental Services - Highways	Enquiry from Solicitor, Developer, Business	Level 4 -Highway search plans and written response to 6+ questions		250.00	255.00	2%	
Environment	Environmental Services - Highways	Permissions Highways Act 1980	Section 50 Opening of Highway	Up to 3 Days	410.00	420.00	2%	
Environment	Environmental Services - Highways	Permissions Highways Act 1980	Section 50 Opening of Highway	4-10 Days	875.00	895.00	2%	
Environment	Environmental Services - Highways	Permissions Highways Act 1980	Section 50 Opening of Highway	Over 10 Days	2,300.00	2,350.00	2%	
Environment	Environmental Services - Highways	Permissions Highways Act 1980	Section 50 Opening of Highway - Non excavation		350.00	360.00	3%	Rounding for efficiency of collection
Environment	Environmental Services - Highways	Permissions Highways Act 1980	Section 50 Opening of Highway - Extension fee Footway Works		250.00	255.00	2%	
Environment	Environmental Services - Highways	Permissions Highways Act 1980	Section 50 Opening of Highway-Extension fee Carriageway Works		500.00	510.00	2%	
Environment	Environmental Services - Highways	Permissions Highways Act 1980	Temporary Crossover permission - Standard Vehicle		900.00	920.00	2%	
Environment	Environmental Services - Highways	Permissions Highways Act 1980	Temporary Crossover permission - Heavy Duty Vehicle over 5 tonnes in weight		2,500.00	2,550.00	2%	
Environment	Environmental Services - Highways	Permissions Highways Act 1980	Extension fees Temporary Crossovers - Standard Vehicle		250.00	255.00	2%	
Environment	Environmental Services - Highways	Permissions Highways Act 1980	Extension fees Temporary Crossovers - Heavy Duty Vehicle Over 5 tonne in weight		400.00	410.00	3%	Rounding for efficiency of collection
Environment	Environmental Services - Highways	Permissions Highways Act 1980	Site Inspection fee for valid complaints or unauthorised overstay		250.00	255.00	2%	
Environment	Environmental Services - Highways	Skips	Highways Management/Coordination		100.00	102.00	2%	
Environment	Environmental Services - Highways	Highways License	Highways Occupation Licence		625.00	640.00	2%	
Environment	Environmental Services - Highways	Highways License	Highways pre-works advice for highway activities and construction management	Per Hour	65.00	67.00	3%	Rounding for efficiency of collection
Environment	Environmental Services - Highways	Highways License	Short hold traffic arrangements assessment and permission		155.00	160.00	3%	Rounding for efficiency of collection
Environment	Environmental Services - Highways	Highways License	Temporary Structure Agreement (TSA) for Filming Activities		65.00	67.00	3%	Rounding for efficiency of collection
Environment	Environmental Services - Highways	Materials License Fee	Deposit value <£750 Level 1 Fee		425.00	435.00	2%	
Environment	Environmental Services - Highways	Materials License Fee	£751-<£1500 Level 2 Fee		625.00	640.00	2%	

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Environmental Services - Highways	Materials License Fee	£1501<£3000 Level 3 Fee		1,000.00	1,020.00	2%	
Environment	Environmental Services - Highways	Materials License Fee	£3001<£6000 Level 4 Fee		1,200.00	1,225.00	2%	
Environment	Environmental Services - Highways	Materials License Fee	£6001< Level 5 Fee		40% of deposit	40% of deposit	NA	NA
Environment	Environmental Services - Highways	Scaffold License Fee	Deposit value <£750 Level 1 Fee		425.00	435.00	2%	
Environment	Environmental Services - Highways	Scaffold License Fee	£751<£1500 Level 2 Fee		625.00	640.00	2%	
Environment	Environmental Services - Highways	Scaffold License Fee	£1501<£3000 Level 3 Fee		1,000.00	1,020.00	2%	
Environment	Environmental Services - Highways	Scaffold License Fee	£3001<£6000 Level 4 Fee		1,200.00	1,225.00	2%	
Environment	Environmental Services - Highways	Scaffold License Fee	£6001< Level 5 Fee		40% of deposit	40% of deposit	NA	NA
Environment	Environmental Services - Highways	Scaffold Gantry License Fee	Deposit value <£750 Level 1 Fee		850.00	870.00	2%	
Environment	Environmental Services - Highways	Scaffold Gantry License Fee	£751<£1500 Level 2 Fee		1,300.00	1,330.00	2%	
Environment	Environmental Services - Highways	Scaffold Gantry License Fee	£1501<£3000 Level 3 Fee		1,700.00	1,735.00	2%	
Environment	Environmental Services - Highways	Scaffold Gantry License Fee	£3001<£6000 Level 4 Fee		1,800.00	1,840.00	2%	
Environment	Environmental Services - Highways	Scaffold Gantry License Fee	£6001< Level 5 Fee		40% of deposit	40% of deposit	NA	NA
Environment	Environmental Services - Highways	Hoarding License Fee	Deposit value <£750 Level 1 Fee		425.00	435.00	2%	
Environment	Environmental Services - Highways	Hoarding License Fee	£751<£1500 Level 2 Fee		625.00	640.00	2%	
Environment	Environmental Services - Highways	Hoarding License Fee	£1501<£3000 Level 3 Fee		1,000.00	1,020.00	2%	
Environment	Environmental Services - Highways	Hoarding License Fee	£3001<£6000 Level 4 Fee		1,200.00	1,225.00	2%	
Environment	Environmental Services - Highways	Hoarding License Fee	£6001< Level 5 Fee		40% of deposit	40% of deposit	NA	NA
Environment	Environmental Services - Highways	Hoarding License Fee	Extension fees for Material, Scaffolding & Hoarding, Gantry Level 1		250.00	255.00	2%	
Environment	Environmental Services - Highways	Hoarding License Fee	Extension fees for Material, Scaffolding & Hoarding, Gantry Level 2		350.00	360.00	3%	Rounding for efficiency of collection
Environment	Environmental Services - Highways	Hoarding License Fee	Extension fees for Material, Scaffolding & Hoarding, Gantry Level 3		450.00	460.00	2%	
Environment	Environmental Services - Highways	Hoarding License Fee	Extension fees for Material, Scaffolding & Hoarding, Gantry Level 4		550.00	560.00	2%	
Environment	Environmental Services - Highways	Hoarding License Fee	Extension fees for Material, Scaffolding & Hoarding, Gantry Level 5		650.00	670.00	3%	Rounding for efficiency of collection
Environment	Environmental Services - Highways	Hoarding License Fee	Site Inspection fee for valid complaints or unauthorised overstay		250.00	255.00	2%	
Environment	Environmental Services - Highways	Construction Site Service Area	Deposit value <£750 Level 1 Fee		450.00	460.00	2%	
Environment	Environmental Services - Highways	Construction Site Service Area	£751<£1500 Level 2 Fee		650.00	670.00	3%	Rounding for efficiency of collection
Environment	Environmental Services - Highways	Construction Site Service Area	£1501<£3000 Level 3 Fee		1,000.00	1,020.00	2%	
Environment	Environmental Services - Highways	Construction Site Service Area	£3001<6000 Level 4 Fee		1,200.00	1,225.00	2%	
Environment	Environmental Services - Highways	Construction Site Service Area	£6001< Level 5 Fee		40% of deposit	40% of deposit	NA	NA
Environment	Environmental Services - Highways	Crane Operation Licenses	Oversailing the highway		950.00	970.00	2%	
Environment	Environmental Services - Highways	Crane Operation Licenses	Operation on the highway		450.00	460.00	2%	
Environment	Environmental Services - Highways	Crane Operation Licenses	Overhang licence section 177 Highways Act 1980		450.00	460.00	2%	
Environment	Environmental Services - Highways	Containers	Management fee		220.00	225.00	2%	
Environment	Environmental Services - Highways	Containers	Weekly storage fee on the highway		230.00	235.00	2%	
Environment	Environmental Services - Highways	Legal Notices & Works Road Traffic Act 1984	Temporary Traffic Restriction Orders/Notices (incl statutory press notices) under section 14(1) for max of 3 months or Emergency works 14(2)		3,775.00	3,850.00	2%	
Environment	Environmental Services - Highways	Legal Notices & Works Road Traffic Act 1984	Extension to section 14 closure per month		575.00	590.00	3%	Rounding for efficiency of collection

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Environmental Services - Highways	Legal Notices & Works Road Traffics Act 1984	Temporary Traffic Restriction Orders/Notices (incl statutory press notices) under section 16A Commercial Street Parties		3,775.00	3,850.00	2%	
Environment	Environmental Services - Highways	Legal Notices & Works Road Traffics Act 1984	Permanent traffic orders under all sections of the highways, traffic regulation and road traffic acts		2,525.00	2,575.00	2%	
Environment	Environmental Services - Highways	Legal Notices & Works Road Traffics Act 1984	Temporary Traffic Restriction Orders/Notices (Less than 24 hours) for filming activities under section 16a/2		1,000.00	1,020.00	2%	
Environment	Environmental Services - Highways	Planter Application Fee	Planter application for assessment and Permission	1 - 5 years	102.40	104.45	2%	
Environment	Environmental Services - Highways	Planter Licenence fee	Planter licence fee to occupy Public Highways	1 year	116.00	118.32	2%	
Environment	Environmental Services - Highways	Rental fee for Planter Container	Planter Container to rent and fill soil	1- 5 year (300x690x600)	770.00	785.40	2%	
Environment	Environmental Services - Highways	Rental fee for Planter Container	Planter Container to rent and fill soil	1- 5 year (600x990x600)	900.00	918.00	2%	
Environment	Environmental Services - Highways	Rental fee for Planter Container	Planter Container to rent and fill soil	1- 5 year (1300x1300x800)	1,000.00	1,020.00	2%	
Environment	Environmental Services - Highways	Hedge, tree and Foilage overhang inspection and admin	Hedge, Tree and Follage - Management and assesment Fee		260.00	265.20	2%	
Environment	Environmental Services - Highways	Hedge, tree and Foilage overhang assesment fee for actual works	Hedge, tree and foilage pruning and removal of waste	Per Hour	85.00	86.70	2%	
Environment	Environmental Services - Highways	Rechargeable Works	Professional fees for works: Site Visits/Estimates /Works management		30% of works cost	30% of works cost	NA	NA
Environment	Environmental Services - Highways	Rechargeable Works	Emergency call out works: Vehicle and response team		715.00	729.30	2%	
Environment	Commercial Waste	Waste Management	Sacks	Per 50	89.90	91.70	2%	
Environment	Commercial Waste	Waste Management	Rec Sacks	Per 50	70.50	71.91	2%	
Environment	Commercial Waste	Waste Management	Bulk	Per item (minimum charge £50)	23.80	24.28	2%	
Environment	Commercial Waste	Waste Management	Paladin	Per lift	16.30	16.63	2%	
Environment	Commercial Waste	Waste Management	Paladin	Annual hire	130.20	132.80	2%	
Environment	Commercial Waste	Waste Management	Wheelie Bin 240 litre	Per lift	7.50	7.65	2%	
Environment	Commercial Waste	Waste Management	Wheelie Bin 240 litre (Rec)	Per lift	6.70	6.83	2%	
Environment	Commercial Waste	Waste Management	Wheelie Bin 330/360 litre	Per lift	9.30	9.49	2%	
Environment	Commercial Waste	Waste Management	Wheelie Bin 330/360 litre (Rec)	Per lift	6.70	6.83	2%	
Environment	Commercial Waste	Waste Management	Eurobin 550/660 litre	Per lift	13.00	13.26	2%	
Environment	Commercial Waste	Waste Management	Eurobin 550/660 litre (Rec)	Per lift	8.00	8.16	2%	
Environment	Commercial Waste	Waste Management	Eurobin 550/660 litre	Annual hire	141.00	143.82	2%	
Environment	Commercial Waste	Waste Management	Eurobin 770 litre	Per lift	14.10	14.38	2%	
Environment	Commercial Waste	Waste Management	Eurobin 770 litre	Annual hire	162.70	165.95	2%	
Environment	Commercial Waste	Waste Management	Eurobin 1100 litre	Per lift	17.40	17.75	2%	
Environment	Commercial Waste	Waste Management	Eurobin 1100 litre	Annual hire	10.00	10.20	2%	
Environment	Commercial Waste	Waste Management	Eurobin 1280 litre	Per lift	195.20	199.10	2%	
Environment	Commercial Waste	Waste Management	Eurobin 1280 litre	Annual hire	18.40	18.77	2%	
Environment	Commercial Waste	Waste Management	Skips Light Waste (8 yarder)	Per lift	217.00	221.34	2%	
Environment	Commercial Waste	Waste Management	Skips Building Material (8 yarder)	Per lift	304.00	310.08	2%	
Environment	Commercial Waste	Waste Management	Special Collections (Minimum Charge)	One off	369.00	376.38	2%	
Environment	Commercial Waste	Waste Management	Confidential Waste Collection	One off	86.80	88.54	2%	
Environment	Commercial Waste	Purchase of Eurobins	240 litre		57.50	58.65	2%	
Environment	Commercial Waste	Purchase of Eurobins	360 litre		104.10	106.18	2%	
Environment	Commercial Waste	Purchase of Eurobins	660 litre		412.00	420.24	2%	

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Commercial Waste	Purchase of Eurobins	770 litre		434.00	442.68	2%	
Environment	Commercial Waste	Purchase of Eurobins	1100 litre		466.00	475.32	2%	
Environment	Commercial Waste	Purchase of Eurobins	1280 litre		477.00	486.54	2%	
Environment	Charity/Educational Establishment Waste	Waste Management	Sacks	Per 50	44.40	45.29	2%	
Environment	Charity/Educational Establishment Waste	Waste Management	Paladin hire	Per lift	8.80	8.98	2%	
Environment	Charity/Educational Establishment Waste	Waste Management	Paladin hire	Annual hire	130.20	132.80	2%	
Environment	Charity/Educational Establishment Waste	Waste Management	Wheelie Bin 240 litre	Per lift	4.40	4.49	2%	
Environment	Charity/Educational Establishment Waste	Waste Management	Wheelie Bin 330/360 litre	Per lift	6.60	6.73	2%	
Environment	Charity/Educational Establishment Waste	Waste Management	Eurobin 550/660 litre	Per lift	7.10	7.24	2%	
Environment	Charity/Educational Establishment Waste	Waste Management	Eurobin 550/660 litre	Annual hire	141.00	143.82	2%	
Environment	Charity/Educational Establishment Waste	Waste Management	Eurobin 770/800 litre	Per lift	8.20	8.36	2%	
Environment	Charity/Educational Establishment Waste	Waste Management	Eurobin 770/800 litre	Annual hire	162.70	165.95	2%	
Environment	Charity/Educational Establishment Waste	Waste Management	Eurobin 1100 litre	Per lift	8.80	8.98	2%	
Environment	Charity/Educational Establishment Waste	Waste Management	Eurobin 1100 litre	Annual hire	195.20	199.10	2%	
Environment	Charity/Educational Establishment Waste	Waste Management	Eurobin 1280 litre	Per lift	10.00	10.20	2%	
Environment	Charity/Educational Establishment Waste	Waste Management	Eurobin 1280 litre	Annual hire	216.90	221.24	2%	
Environment	Charity/Educational Establishment Waste	Waste Management	Skips Light Waste (8 yarder)	Per lift	216.90	221.24	2%	
Environment	Charity/Educational Establishment Waste	Waste Management	Skips Light Waste (12 yarder) perm	Per lift	227.80	232.36	2%	
Environment	Charity/Educational Establishment Waste	Waste Management	Special Collections (Minimum Charge)	One off	104.10	106.18	2%	
Environment	Charity/Educational Establishment Waste	Waste Management	Confidential Waste Collection	One off	70.50	71.91	2%	
Environment	Charity/Educational Establishment Waste	Purchase of Eurobins	240 litre		57.50	58.65	2%	
Environment	Charity/Educational Establishment Waste	Purchase of Eurobins	360 litre		104.10	106.18	2%	
Environment	Charity/Educational Establishment Waste	Purchase of Eurobins	660 litre		412.00	420.24	2%	
Environment	Charity/Educational Establishment Waste	Purchase of Eurobins	770 litre		434.00	442.68	2%	
Environment	Charity/Educational Establishment Waste	Purchase of Eurobins	1100 litre		466.00	475.32	2%	
Environment	Charity/Educational Establishment Waste	Purchase of Eurobins	1280 litre		477.00	486.54	2%	
Environment	Charity/Educational Establishment Waste	Purchase of Eurobins	Duty of Care Document Charge	Quarterly	17.40	17.75	2%	
Environment	Charity/Educational Establishment Waste	Purchase of Eurobins	Duty of Care Document Charge	Semi-Annually	34.70	35.39	2%	
Environment	Charity/Educational Establishment Waste	Purchase of Eurobins	Duty of Care Document Charge	Annual	68.30	69.67	2%	
Environment	Clinical Waste	Removal of Bagged Clinical Waste	Min charge per visit	Up to (and Including) 7 Bags	38.00	38.76	2%	
Environment	Clinical Waste	Removal of Bagged Clinical Waste	Each additional bag over 7 collected	Per Bag	6.00	6.12	2%	
Environment	Clinical Waste	Sharps	Min charge per visit	Up to (and Including) 5 Boxes	38.00	38.76	2%	
Environment	Clinical Waste	Removal of Bagged Clinical Waste	Each additional box over 5 collected	Per Bag	6.00	6.12	2%	
Environment	Bulky Waste	Removal of Bulky Waste	Bulky Waste	Per item (minimum charge £31.50)	10.50	10.71	2%	
Environment	Bulky Waste	Removal of Bulky Waste	Reusable bulky waste	Per item (minimum charge £15.90)	5.30	5.41	2%	
Environment	Parking Permits	Blue Badges	Blue Badge processing		0.00	0.00	NA	NA
Environment	Parking Permits	Blue Badges	Associated residents permit for Blue Badge holders		0.00	0.00	NA	NA
Environment	Parking Permits	Blue Badges	Blue Badge replacement for lost 1st one in 3 years		0.00	0.00	NA	NA
Environment	Parking Permits	Blue Badges	Blue Badge replacement for stolen 1st one in 3 years		0.00	0.00	NA	NA
Environment	Parking Permits	Blue Badges	Blue Badge replacement for lost subsequent ones in 3 years		10.00	11.00	10%	Separate council policy
Environment	Parking Permits	All Diesel Vehicles	Surcharge in Addition to Standard Permit	1 month permit	10.50	11.55	10%	Separate council policy
Environment	Parking Permits	All Diesel Vehicles	Surcharge in Addition to Standard Permit	3 month permit	31.50	34.65	10%	Separate council policy
Environment	Parking Permits	All Diesel Vehicles	Surcharge in Addition to Standard Permit	6 month permit	63.00	69.30	10%	Separate council policy
Environment	Parking Permits	All Diesel Vehicles	Surcharge in Addition to Standard Permit	12 month permit	126.00	138.60	10%	Separate council policy

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Zero emission - electric vehicles	1 month permit	7.50	8.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Zero emission - electric vehicles	3 month permit	7.50	8.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Zero emission - electric vehicles	6 month permit	12.50	14.00	12%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Zero emission - electric vehicles	12 month permit	25.00	28.00	12%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band A (up to 100g/km)	1 month permit	7.50	8.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band A (up to 100g/km)	3 month permit	10.00	11.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band A (up to 100g/km)	6 month permit	15.00	16.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band A (up to 100g/km)	12 month permit	30.00	33.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band B (101-110g/km)	1 month permit	7.50	8.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band B (101-110g/km)	3 month permit	10.00	11.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band B (101-110g/km)	6 month permit	17.50	19.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band B (101-110g/km)	12 month permit	35.00	38.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band C (111-120g/km)	1 month permit	7.50	8.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band C (111-120g/km)	3 month permit	12.50	13.75	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band C (111-120g/km)	6 month permit	20.00	22.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band C (111-120g/km)	12 month permit	40.00	44.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band D (121-130g/km)	1 month permit	10.00	11.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band D (121-130g/km)	3 month permit	25.00	27.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band D (121-130g/km)	6 month permit	47.50	52.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band D (121-130g/km)	12 month permit	95.00	104.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band E (131-140g/km)	1 month permit	12.50	13.75	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band E (131-140g/km)	3 month permit	30.00	33.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band E (131-140g/km)	6 month permit	57.50	63.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band E (131-140g/km)	12 month permit	115.00	126.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band F (141-150g/km)	1 month permit	15.00	16.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band F (141-150g/km)	3 month permit	35.00	38.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band F (141-150g/km)	6 month permit	62.50	68.75	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band F (141-150g/km)	12 month permit	125.00	137.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band G (151-165g/km)	1 month permit	17.50	19.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band G (151-165g/km)	3 month permit	40.00	44.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band G (151-165g/km)	6 month permit	75.00	82.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band G (151-165g/km)	12 month permit	150.00	165.00	10%	Separate council policy

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band H (166-175g/km)	1 month permit	20.00	22.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band H (166-175g/km)	3 month permit	45.00	49.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band H (166-175g/km)	6 month permit	87.50	96.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band H (166-175g/km)	12 month permit	175.00	192.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band I (176-185g/km)	1 month permit	22.50	24.75	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band I (176-185g/km)	3 month permit	60.00	66.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band I (176-185g/km)	6 month permit	100.00	110.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band I (176-185g/km)	12 month permit	200.00	220.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band J (186-200g/km)	1 month permit	25.00	27.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band J (186-200g/km)	3 month permit	70.00	77.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band J (186-200g/km)	6 month permit	127.50	140.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band J (186-200g/km)	12 month permit	255.00	280.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band K (201- 225g/km)	1 month permit	27.50	30.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band K (201- 225g/km)	3 month permit	75.00	82.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band K (201- 225g/km)	6 month permit	147.50	162.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band K (201- 225g/km)	12 month permit	295.00	324.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band L (226-255g/km)	1 month permit	40.00	44.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band L (226-255g/km)	3 month permit	110.00	121.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band L (226-255g/km)	6 month permit	207.50	228.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band L (226-255g/km)	12 month permit	415.00	456.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band M (256g/km and above)	1 month permit	45.00	49.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band M (256g/km and above)	3 month permit	135.00	148.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band M (256g/km and above)	6 month permit	267.50	294.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Based on CO2 Emission)	Band M (256g/km and above)	12 month permit	535.00	588.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Electric vehicles - zero emissions	1 month permit	7.50	8.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Electric vehicles - zero emissions	3 month permit	7.50	8.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Electric vehicles - zero emissions	6 month permit	12.50	13.75	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Electric vehicles - zero emissions	12 month permit	25.00	27.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band A	1 month permit	7.50	8.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band A	3 month permit	10.00	11.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band A	6 month permit	15.00	16.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band A	12 month permit	30.00	33.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band B (1-900cc)	1 month permit	7.50	8.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band B (1-900cc)	3 month permit	10.00	11.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band B (1-900cc)	6 month permit	17.50	19.25	10%	Separate council policy

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band B (1-900cc)	12 month permit	35.00	38.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band C (901-1100cc)	1 month permit	7.50	8.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band C (901-1100cc)	3 month permit	12.50	13.75	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band C (901-1100cc)	6 month permit	20.00	22.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band C (901-1100cc)	12 month permit	40.00	44.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band D (1101-1200cc)	1 month permit	10.00	11.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band D (1101-1200cc)	3 month permit	25.00	27.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band D (1101-1200cc)	6 month permit	47.50	52.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band D (1101-1200cc)	12 month permit	95.00	104.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band E (1201-1300cc)	1 month permit	12.50	13.75	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band E (1201-1300cc)	3 month permit	30.00	33.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band E (1201-1300cc)	6 month permit	57.50	63.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band E (1201-1300cc)	12 month permit	115.00	126.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band F (1301-1399cc)	1 month permit	15.00	16.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band F (1301-1399cc)	3 month permit	35.00	38.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band F (1301-1399cc)	6 month permit	62.50	68.75	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band F (1301-1399cc)	12 month permit	125.00	137.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band G (1400-1500cc)	1 month permit	17.50	19.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band G (1400-1500cc)	3 month permit	40.00	44.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band G (1400-1500cc)	6 month permit	75.00	82.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band G (1400-1500cc)	12 month permit	150.00	165.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band H (1501-1650cc)	1 month permit	20.00	22.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band H (1501-1650cc)	3 month permit	45.00	49.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band H (1501-1650cc)	6 month permit	87.50	96.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band H (1501-1650cc)	12 month permit	175.00	192.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band I (1651-1850cc)	1 month permit	22.50	24.75	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band I (1651-1850cc)	3 month permit	60.00	66.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band I (1651-1850cc)	6 month permit	100.00	110.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band I (1651-1850cc)	12 month permit	200.00	220.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band J (1851-2100cc)	1 month permit	25.00	27.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band J (1851-2100cc)	3 month permit	70.00	77.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band J (1851-2100cc)	6 month permit	127.50	140.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band J (1851-2100cc)	12 month permit	255.00	280.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band K (2101-2500cc)	1 month permit	27.50	30.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band K (2101-2500cc)	3 month permit	75.00	82.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band K (2101-2500cc)	6 month permit	147.50	162.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band K (2101-2500cc)	12 month permit	295.00	324.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band L (2501-2750cc)	1 month permit	40.00	44.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band L (2501-2750cc)	3 month permit	110.00	121.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band L (2501-2750cc)	6 month permit	207.50	228.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band L (2501-2750cc)	12 month permit	415.00	456.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band M (2751cc and above)	1 month permit	45.00	49.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band M (2751cc and above)	3 month permit	135.00	148.50	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band M (2751cc and above)	6 month permit	267.50	294.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit (Pre-2001 Vehicles)	Band M (2751cc and above)	12 month permit	535.00	588.50	10%	Separate council policy
Environment	Parking Permits	Motorcycle Parking Permit	Solo Motorcycle	1 month permit	7.50	7.65	2%	
Environment	Parking Permits	Motorcycle Parking Permit	Solo Motorcycle	3 month permit	15.00	15.30	2%	
Environment	Parking Permits	Motorcycle Parking Permit	Solo Motorcycle	6 month permit	30.00	30.60	2%	
Environment	Parking Permits	Motorcycle Parking Permit	Solo Motorcycle	12 month permit	60.00	61.20	2%	
Environment	Parking Permits	Motorcycle Parking Permit	Residents match day permit - valid only during match or event days		0.00	0.00	0%	NA
Environment	Parking Permits	Motorcycle Parking Permit	Hire Car permit (linked to hire car vouchers)		16.10	16.42	2%	
Environment	Parking Permits	Motorcycle Parking Permit	Residents permit - black taxi concession - one band lower than the norm		Various	Various	NA	NA

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Electric Vehicles	Per Complete Month	2.00	2.20	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band A	Per Complete Month	2.50	2.75	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band B	Per Complete Month	2.75	3.03	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band C	Per Complete Month	3.25	3.58	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band D	Per Complete Month	7.50	8.25	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band E	Per Complete Month	9.25	10.18	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band F	Per Complete Month	10.00	11.00	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band G	Per Complete Month	12.00	13.20	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band H	Per Complete Month	14.00	15.40	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band I	Per Complete Month	16.25	17.88	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band J	Per Complete Month	21.00	23.10	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band K	Per Complete Month	24.00	26.40	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band L	Per Complete Month	34.00	37.40	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Band M	Per Complete Month	44.00	48.40	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Admin fee - refund handling charge	Per Complete Month	26.50	29.15	10%	Separate council policy
Environment	Parking Permits	Residents Parking Permit Refunds for Unused Permits	Diesel vehicle surcharge refund - 1 month	Per Complete Month	10.00	11.00	10%	Separate council policy
Environment	Parking Permits	Visitor Parking Vouchers	Half hour vouchers	Book of 20	12.65	12.90	2%	
Environment	Parking Permits	Visitor Parking Vouchers	3-hour vouchers	Book of 10	34.70	35.40	2%	
Environment	Parking Permits	Visitor Parking Vouchers	All day voucher		16.00	16.40	2%	
Environment	Parking Permits	Visitor Parking Vouchers	Half hour vouchers (concessionary)		6.35	6.50	2%	
Environment	Parking Permits	Visitor Parking Vouchers	3-hour vouchers (concessionary)		17.35	17.70	2%	
Environment	Parking Permits	Visitor Parking Vouchers	All day voucher (concessionary)		8.00	8.20	2%	
Environment	Parking Permits	Visitor Parking Vouchers	E-visitor voucher charges (per half hour)		0.50	0.60	20%	Rounding for efficiency of collection
Environment	Parking Permits	Visitor Parking Vouchers	E-visitor voucher charges (concessionary - per half hour session)		0.25	0.30	20%	Rounding for efficiency of collection
Environment	Parking Permits	Visitor Parking Vouchers	E-visitor vouchers - all day		14.50	14.80	2%	
Environment	Parking Permits	Visitor Parking Vouchers	E-visitor vouchers - Diesel vehicle fuel surcharge - per half hour			0.25	NA	New Charge for 2022/23
Environment	Parking Permits	Visitor Parking Vouchers	E-visitor vouchers - Diesel vehicle fuel surcharge - all day			5.00	NA	New Charge for 2022/23
Environment	Parking Permits	Visitor Parking Vouchers	E-visitor vouchers - Petrol vehicle fuel surcharge - per half hour			0.10	NA	New Charge for 2022/23
Environment	Parking Permits	Visitor Parking Vouchers	E-visitor vouchers - Petrol vehicle fuel surcharge - per half hour			2.00	NA	New Charge for 2022/23
Environment	Parking Permits	Visitor Parking Vouchers	E-visitor vouchers - all day (concessionary)		7.25	7.40	2%	
Environment	Parking Permits	Visitor Parking Vouchers	E-visitors - evenings (C & K zones only)		0.00	0.00	NA	NA
Environment	Parking Permits	Visitor Parking Vouchers	Hire car permit holder vouchers - half hour	Book of 20	9.90	10.10	2%	

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Parking Permits	Visitor Parking Vouchers	Hire car permit holder vouchers - 3 hour	Book of 10	28.80	29.40	2%	
Environment	Parking Permits	Visitor Parking Vouchers	1-hour business voucher	Book of 10	13.90	14.20	2%	
Environment	Parking Permits	Visitor Parking Vouchers	New parents vouchers - 40 hours free		0.00	0.00	NA	NA
Environment	Parking Permits	Visitor Parking Vouchers	1-hour business visitor vouchers	Book of 20	60.00	61.20	2%	
Environment	Parking Permits	Business Visitor Parking Vouchers	Business visitor Half hour vouchers	Book of 20	14.90	15.20	2%	
Environment	Parking Permits	Business Visitor Parking Vouchers	Business visitor All day voucher		33.35	34.10	2%	
Environment	Parking Permits	Other Permits	Doctors parking permit	Annual	281.50	287.15	2%	
Environment	Parking Permits	Other Permits	(New Doctors parking place installation - includes 1 permit)		3,185.00	3,248.70	2%	
Environment	Parking Permits	Other Permits	Essential Services Permit (formerly Teacher Permit)	Annual	398.00	406.00	2%	
Environment	Parking Permits	Other Permits	Business permit (under 150kg/m2 or up to 1600cc)	Annual	794.00	810.00	2%	
Environment	Parking Permits	Other Permits	Business permit (under 150kg/m2 or up to 1600cc) 2nd permit	Annual	1,060.00	1,081.20	2%	
Environment	Parking Permits	Other Permits	Business permit (over 151kg/m2 or over 1600cc)	Annual	1,320.00	1,346.40	2%	
Environment	Parking Permits	Other Permits	Business permit (over 151kg/m2 or over 1600cc) 2nd permit	Annual	1,570.00	1,601.40	2%	
Environment	Parking Permits	Other Permits	Business permit - electric		614.00	626.30	2%	
Environment	Parking Permits	Other Permits	Business permit - linked to vouchers scheme	Annual	20.80	21.25	2%	
Environment	Parking Permits	Other Permits	Match day and event day trader permits	Annual	728.00	742.60	2%	
Environment	Parking Permits	Other Permits	Permission to Park	Per Day	28.90	29.50	2%	
Environment	Parking Permits	Other Permits	Permission to Park	Per Week	115.00	117.50	2%	
Environment	Parking Permits	Other Permits	Permission to Park	Per Month	448.00	457.00	2%	
Environment	Parking Permits	Other Permits	Permission to Park - Diesel fuel surcharge	Per Day		5.00	NA	New Charge for 2022/23
Environment	Parking Permits	Other Permits	Permission to Park - Diesel fuel surcharge	Per Week		25.00	NA	New Charge for 2022/23
Environment	Parking Permits	Other Permits	Permission to Park - Diesel fuel surcharge	Per Month		100.00	NA	New Charge for 2022/23
Environment	Parking Permits	Other Permits	Permission to Park - Petrol vehicle fuel surcharge	Per Day		2.00	NA	New Charge for 2022/23
Environment	Parking Permits	Other Permits	Permission to Park - Petrol vehicle fuel surcharge	Per Week		10.00	NA	New Charge for 2022/23
Environment	Parking Permits	Other Permits	Permission to Park - Petrol vehicle fuel surcharge	Per Month		40.00	NA	New Charge for 2022/23
Environment	Parking Permits	Other Permits	Universal all-zone permit (1-25 fleet vehicles)	Annual	4,360.00	4,447.20	2%	
Environment	Parking Permits	Other Permits	Universal all-zone permit (26-50 fleet vehicles)	Annual	2,910.00	2,968.20	2%	
Environment	Parking Permits	Other Permits	Universal all-zone permit (50+ fleet vehicles)	Annual	1,490.00	1,519.80	2%	
Environment	Parking Permits	Other Permits	Universal all-zone permit (non-fleet)	Per Month	382.50	390.15	2%	
Environment	Parking Permits	Other Permits	Universal permit - discounted fee for electric vehicles		3,148.00	3,211.00	2%	
Environment	Parking Permits	Other Permits	Universal permit - discounted fee for registered charities		3,148.00	3,211.00	2%	
Environment	Parking Permits	Other Permits	Car club permit		270.00	275.40	2%	
Environment	Parking Permits	Other Permits	Trader's Permit		27.70	28.25	2%	
Environment	Parking	Parking Suspensions	Permission to place a licensed skip in a parking place - no dedicated suspension		66.50	67.90	2%	

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Parking	Parking Suspensions	Suspension admin charge (non residents)	First Day	218.00	222.40	2%	
Environment	Parking	Parking Suspensions	Suspension admin charge (residents)	First Day	104.50	106.60	2%	
Environment	Parking	Parking Suspensions	Suspension admin charge (all applicants)	Per Subsequence Day	33.25	33.95	2%	
Environment	Parking	Parking Suspensions	Film work waiver	Per Day	63.50	64.80	2%	
Environment	Parking	Parking Suspensions	Yellow line essential parking waiver	Per Day	65.50	66.90	2%	
Environment	Parking	Pay & Display Tariffs	Minimum made order - Band 1	Per Hour	1.25	1.30	4%	Rounding for efficiency of collection
Environment	Parking	Pay & Display Tariffs	Minimum made order - Band 2	Per Hour	1.85	1.90	3%	Rounding for efficiency of collection
Environment	Parking	Pay & Display Tariffs	Minimum made order - Band 3	Per Hour	2.05	2.10	2%	
Environment	Parking	Pay & Display Tariffs	Minimum made order - Band 4	Per Hour	2.45	2.50	2%	
Environment	Parking	Pay & Display Tariffs	Minimum made order - Band 5	Per Hour	3.05	3.15	3%	Rounding for efficiency of collection
Environment	Parking	Pay & Display Tariffs	Minimum made order - Band 6	Per Hour	3.70	3.80	3%	Rounding for efficiency of collection
Environment	Parking	Pay & Display Tariffs	Minimum made order - Band 7	Per Hour	4.10	4.20	2%	
Environment	Parking	Pay & Display Tariffs	Minimum made order - Band 8	Per Hour	4.95	5.05	2%	
Environment	Parking	Pay & Display Tariffs	Minimum made order - Band 9	Per Hour	5.15	5.25	2%	
Environment	Parking	Pay & Display Tariffs	Minimum made order - Band 10	Per Hour	5.55	5.70	3%	Rounding for efficiency of collection
Environment	Parking	Pay & Display Tariffs	Minimum made order - Band 11	Per Hour	6.20	6.35	2%	
Environment	Parking	Pay & Display Tariffs	Diesel vehicle surcharge	Per Hour	5.00	5.10	2%	
Environment	Parking	Pay & Display Tariffs	Electric vehicle nominal fee	Transaction fee	0.20	0.20	2%	
Environment	Parking	Pay & Display Tariffs	Petrol vehicle surcharge 1-185g/km CO2	Per Hour	1.00	1.05	5%	Rounding for efficiency of collection
Environment	Parking	Pay & Display Tariffs	Petrol vehicle surcharge 186-225p/km CO2	Per Hour	2.00	2.10	5%	Rounding for efficiency of collection
Environment	Parking	Pay & Display Tariffs	Petrol vehicle surcharge 226g/km and over CO2	Per Hour	3.00	3.15	5%	Rounding for efficiency of collection
Environment	Parking	Abandoned Vehicle Disposal	Motor Vehicle from Private Land		217.00	221.50	2%	
Environment	Parking	Abandoned Vehicle Disposal	Motorcycle/PTW from Private Land		163.00	166.30	2%	
Environment	Parking	Cycle Hangars	Annual rental of secure covered parking space		110.00	112.20	2%	
Environment	Parking	Cycle Hangars	Refundable Key deposit		26.50	27.10	2%	
Environment	Parking	Cycle Hangars	Daily charges for external bus hire clients	Per Half Day	76.50	78.10	2%	
Environment	Parks - Sports	Tennis	Highbury Fields and Tufnell Park	Adult standard	11.00	11.22	2%	
Environment	Parks - Sports	Tennis	Highbury Fields and Tufnell Park	Adult BETTER (any)	9.45	9.64	2%	
Environment	Parks - Sports	Tennis	Highbury Fields and Tufnell Park	Child Standard	5.00	5.10	2%	
Environment	Parks - Sports	Tennis	Highbury Fields and Tufnell Park	Child BETTER (any)	3.95	4.03	2%	
Environment	Parks - Sports	Football	Barnard Park - Redgra	No changing rooms - 1 hour	0.00	0.00	NA	Other
Environment	Parks - Sports	Football	Highbury Fields - Astro turf - 1 hour session	Full rate - full pitch	82.00	83.64	2%	
Environment	Parks - Sports	Football	Highbury Fields - Astro turf - 1 hour session	BETTER Card / Clubmark - full pitch	70.00	71.40	2%	
Environment	Parks - Sports	Football	Highbury Fields - Astro turf - 1 hour session	Child rate - full pitch	40.00	40.80	2%	
Environment	Parks - Sports	Football	Highbury Fields - Astro turf - 1 hour session	Child BETTER Card / Clubmark / School - full pitch	33.70	34.37	2%	
Environment	Parks - Sports	Football	Paradise Park - Astro turf - 1 hour session	Full rate - full pitch	47.30	48.25	2%	

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Parks - Sports	Football	Paradise Park - Astro turf - 1 hour session	BETTER Card / Clubmark - full pitch	41.00	41.82	2%	
Environment	Parks - Sports	Football	Paradise Park - Astro turf - 1 hour session	Child rate - full pitch	27.85	28.41	2%	
Environment	Parks - Sports	Football	Paradise Park - Astro turf - 1 hour session	Child BETTER Card / Clubmark / School - full pitch	22.75	23.21	2%	
Environment	Parks - Sports	Football	Rosemary Gardens - Astro turf - 1 hour session	Full rate - full pitch	93.50	95.37	2%	
Environment	Parks - Sports	Football	Rosemary Gardens - Astro turf - 1 hour session	Full rate - half pitch	46.75	47.69	2%	
Environment	Parks - Sports	Football	Rosemary Gardens - Astro turf - 1 hour session	BETTER Card / Clubmark - full pitch	81.00	82.62	2%	
Environment	Parks - Sports	Football	Rosemary Gardens - Astro turf - 1 hour session	BETTER Card / Clubmark - half pitch	40.50	41.31	2%	
Environment	Parks - Sports	Football	Rosemary Gardens - Astro turf - 1 hour session	Child rate - full pitch	55.70	56.81	2%	
Environment	Parks - Sports	Football	Rosemary Gardens - Astro turf - 1 hour session	Child rate - half pitch	27.85	28.41	2%	
Environment	Parks - Sports	Football	Rosemary Gardens - Astro turf - 1 hour session	Child BETTER Card / Clubmark / School - full pitch	45.00	45.90	2%	
Environment	Parks - Sports	Football	Rosemary Gardens - Astro turf - 1 hour session	Child BETTER Card / Clubmark / School - half pitch	22.50	22.95	2%	
Environment	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	Full rate - per 11 a side pitch	102.50	104.55	2%	
Environment	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	BETTER Card / Clubmark - per 11 a side pitch	91.00	92.82	2%	
Environment	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	Child rate - per 11 a side pitch	61.50	62.73	2%	
Environment	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	Child BETTER Card / Clubmark / School - per 11 a side pitch	50.70	51.71	2%	
Environment	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	Full rate - per 9 a side pitch	84.00	85.68	2%	
Environment	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	BETTER Card / Clubmark - per 9 a side pitch	72.80	74.26	2%	
Environment	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	Child rate - per 9 a side pitch	50.50	51.51	2%	
Environment	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	Child BETTER Card / Clubmark / School - per 9 a side pitch	41.40	42.23	2%	
Environment	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	Full rate - per 7 a side pitch	65.20	66.50	2%	
Environment	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	BETTER Card / Clubmark - per 7 a side pitch	57.00	58.14	2%	
Environment	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	Child rate - per 7 a side pitch	39.20	39.98	2%	
Environment	Parks - Sports	Football	Tufnell Park - Grass - 2 hour session	Child BETTER Card / Clubmark / School - per 7 a side pitch	32.35	33.00	2%	
Environment	Parks - Sports	Football	Whittington Park - Astro turf - 1 hour session	Full rate - full pitch	102.50	104.55	2%	
Environment	Parks - Sports	Football	Whittington Park - Astro turf - 1 hour session	Full rate - 3rd of pitch	46.20	47.12	2%	
Environment	Parks - Sports	Football	Whittington Park - Astro turf - 1 hour session	BETTER Card / Clubmark - full pitch	90.65	92.46	2%	
Environment	Parks - Sports	Football	Whittington Park - Astro turf - 1 hour session	BETTER Card / Clubmark - 3rd of a pitch	41.00	41.82	2%	
Environment	Parks - Sports	Football	Whittington Park - Astro turf - 1 hour session	Child rate - full pitch	61.10	62.32	2%	
Environment	Parks - Sports	Football	Whittington Park - Astro turf - 1 hour session	Child rate - 3rd of a pitch	27.35	27.90	2%	
Environment	Parks - Sports	Football	Whittington Park - Astro turf - 1 hour session	Child BETTER Card / Clubmark / School - full pitch	47.50	48.45	2%	

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Parks - Sports	Football	Whittington Park - Astro turf - 1 hour session	Child BETTER Card / Clubmark / School - 3rd of a pitch	21.75	22.19	2%	
Environment	Parks - Sports	Touch Rugby	Paradise Park - Grass - 1 hour session	Full rate - per pitch	58.15	59.31	2%	
Environment	Parks - Sports	Touch Rugby	Paradise Park - Grass - 1 hour session	BETTER Card / Clubmark - per pitch	48.45	49.42	2%	
Environment	Parks - Sports	Touch Rugby	Paradise Park - Grass - 1 hour session	Child rate - per pitch	34.20	34.88	2%	
Environment	Parks - Sports	Touch Rugby	Paradise Park - Grass - 1 hour session	Child BETTER Card / Clubmark / School - per pitch	28.05	28.61	2%	
Environment	Parks - Sports	Cricket	Wray Crescent - Grass - 1pm to dusk	Full rate	104.55	106.64	2%	
Environment	Parks - Sports	Cricket	Wray Crescent - Grass - 1pm to dusk	BETTER Card / Clubmark	88.75	90.53	2%	
Environment	Parks - Sports	Cricket	Wray Crescent - Grass - 1pm to dusk	Child rate	44.40	45.29	2%	
Environment	Parks - Sports	Cricket	Wray Crescent - Grass - 1pm to dusk	Child BETTER Card / Clubmark / School	44.40	45.29	2%	
Environment	Parks - Sports	Cricket	Wray Crescent - Grass - 1pm to 5pm or 5pm to dusk	Full rate	77.00	78.54	2%	
Environment	Parks - Sports	Cricket	Wray Crescent - Grass - 1pm to 5pm or 5pm to dusk	IZZ Card / Clubmark	65.30	66.61	2%	
Environment	Parks - Sports	Cricket	Wray Crescent - Grass - 1pm to 5pm or 5pm to dusk	Child rate	32.65	33.30	2%	
Environment	Parks - Sports	Cricket	Wray Crescent - Grass - 1pm to 5pm or 5pm to dusk	Child IZZ Card / Clubmark / School	32.65	33.30	2%	
Environment	Parks - Sports	Bowls	Finsbury Square	Per Person, Per Hour	7.40	7.55	2%	
Environment	Parks - Sports	Netball	Highbury Fields - Tarmac - 1 hour session	Full rate - per court	38.25	39.02	2%	
Environment	Parks - Sports	Netball	Highbury Fields - Tarmac - 1 hour session	BETTER Card / Clubmark - per court	32.65	33.30	2%	
Environment	Parks - Sports	Netball	Highbury Fields - Tarmac - 1 hour session	Child rate - per court	22.95	23.41	2%	
Environment	Parks - Sports	Netball	Highbury Fields - Tarmac - 1 hour session	Child BETTER Card / Clubmark - per court	19.40	19.79	2%	
Environment	Parks - Sports	Netball	Highbury Fields - Tarmac - 1 hour session	School - whole tarmac area per hour - 8.0am to 4.00pm - Term time only	25.50	26.01	2%	
Environment	Parks - Sports	Netball	Highbury Fields - Tarmac - 1 hour session	Community sports development - whole tarmac area per hour - Saturday 9.00am -1.00pm	25.50	26.01	2%	
Environment	Ecology Centre	Building hire	To Individuals & non-profit organisations	Per hour	33.15	33.81	2%	
Environment	Ecology Centre	Building hire	To Individuals & non-profit organisations	Per day (8 hours)	229.50	234.09	2%	
Environment	Ecology Centre	Building hire	To Individuals & non-profit organisations	Weddings & similar - per day (8 hours)	510.00	520.20	2%	
Environment	Ecology Centre	Equipment Charges	Slide projector		22.00	22.44	2%	
Environment	Ecology Centre	Equipment Charges	Flip chart - per pad		8.50	8.67	2%	
Environment	Ecology Centre	Equipment Charges	Digital Projector and Laptop		44.50	45.39	2%	
Environment	Ecology Centre	Equipment Charges	Plasma Screen		17.50	17.85	2%	
Environment	Ecology Centre	Tuition charges for schools	Islington Council schools	1 hour	63.00	64.26	2%	
Environment	Ecology Centre	Tuition charges for schools	Islington Council schools	1.5 hour	74.00	75.48	2%	
Environment	Ecology Centre	Tuition charges for schools	Private & Out of Borough Schools	1 hour	94.00	95.88	2%	
Environment	Ecology Centre	Tuition charges for schools	Private & Out of Borough Schools	1.5 hour	141.00	143.82	2%	
Environment	Allotments	Large Plot	Nominal 60m2		96.00	98.00	2%	
Environment	Allotments	Large Plot	Concession Nominal 60m3		48.00	49.00	2%	
Environment	Allotments	Medium Plot	Nominal 40m2		64.00	66.00	3%	Rounding for efficiency of collection

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Allotments	Medium Plot	Concession Nominal 40m3		32.00	33.00	3%	Rounding for efficiency of collection
Environment	Allotments	Small Plot	Nominal 20m2		32.00	33.00	3%	Rounding for efficiency of collection
Environment	Allotments	Small Plot	Concession Nominal 20m3		16.00	16.50	3%	Rounding for efficiency of collection
Environment	Parks - Events	Application Fee	Community Event		41.67	41.67	0%	Separate council policy
Environment	Parks - Events	Application Fee	1 day events for up to 500 people without licensable activities		105.00	110.00	5%	Rounding for efficiency of collection
Environment	Parks - Events	Application Fee	Events longer than 1 day, for more than 500 people or with licensable activities		360.00	370.00	3%	Rounding for efficiency of collection
Environment	Parks - Events	Site Hire Fee	No more than 50 people (over the course of the whole event)	Half Day	590.00	610.00	3%	Rounding for efficiency of collection
Environment	Parks - Events	Site Hire Fee	No more than 50 people (over the course of the whole event)	Full Day	845.00	865.00	2%	
Environment	Parks - Events	Site Hire Fee	51 to 500 people (over the course of the whole event)	Half Day	895.00	915.00	2%	
Environment	Parks - Events	Site Hire Fee	51 to 500 people (over the course of the whole event)	Full Day	1,380.00	1,450.00	5%	Rounding for efficiency of collection
Environment	Parks - Events	Site Hire Fee	501 to 1,000 people (over the course of the whole event)	Half Day	1,380.00	1,450.00	5%	Rounding for efficiency of collection
Environment	Parks - Events	Site Hire Fee	501 to 1,000 people (over the course of the whole event)	Full Day	1,740.00	1,800.00	3%	Rounding for efficiency of collection
Environment	Parks - Events	Site Hire Fee	1,001 to 2,500 people (over the course of the whole event)Full day	Half Day	1,740.00	1,800.00	3%	Rounding for efficiency of collection
Environment	Parks - Events	Site Hire Fee	1,001 to 2,500 people (over the course of the whole event)	Full Day	2,150.00	2,200.00	2%	
Environment	Parks - Events	Site Hire Fee	2,501 to 5,000 people (over the course of the whole event)	Half Day	2,150.00	2,200.00	2%	
Environment	Parks - Events	Site Hire Fee	2,501 to 5,000 people (over the course of the whole event)	Full Day	2,450.00	2,500.00	2%	
Environment	Parks - Events	Cancellation Fee	More than 28 days prior to event		25%	25%	NA	NA
Environment	Parks - Events	Cancellation Fee	15-28 days prior to event		50%	50%	NA	NA
Environment	Parks - Events	Cancellation Fee	7-14 days prior to event		75%	75%	NA	NA
Environment	Parks - Events	Cancellation Fee	Less than 7 days prior to event		100%	100%	NA	NA
Environment	Parks - Events	Overstay Fee		Per Hour	0.20	0.20	2%	
Environment	Burials	Private Grave	Classic Grave Space	Resident	1,355.00	1,385.00	2%	
Environment	Burials	Private Grave	Classic Premium Grave Space	Resident	1,820.00	1,860.00	2%	
Environment	Burials	Private Grave	7'x3' Grave Space	Resident	2,375.00	2,425.00	2%	
Environment	Burials	Private Grave	9'x4' Grave Space	Resident	2,535.00	2,585.00	2%	
Environment	Burials	Private Grave	Woodland Burial	Resident	2,295.00	2,345.00	2%	
Environment	Burials	Private Grave	Front lawn areas - 7'x3' Grave Space	Resident	3,890.00	3,970.00	2%	
Environment	Burials	Private Grave	Front lawn areas - 9'x4' Grave Space	Resident	6,020.00	6,145.00	2%	
Environment	Burials	Private Grave	Trent Park- 8'x5' Grave Space	Resident	2,375.00	2,425.00	2%	
Environment	Burials	Private Grave	Children's Memorial Garden	Resident	425.00	435.00	2%	
Environment	Burials	Interment Fees	Individual 16 yrs and over- all cemeteries	Resident	1,160.00	1,185.00	2%	
Environment	Burials	Interment Fees	Individual under 16 yrs	Resident	500.00	510.00	2%	
Environment	Burials	Interment Fees	Front lawn areas - Adult	Resident	2,115.00	2,160.00	2%	
Environment	Burials	Interment Fees	Front lawn areas - under 16 yrs	Resident	920.00	940.00	2%	
Environment	Burials	Interment Fees	Saturday Burial extra charge	Resident	750.00	765.00	2%	
Environment	Burials	Interment Fees	Sunday Burial extra charge	Resident	960.00	980.00	2%	
Environment	Burials	Interment Fees	Saturday burial of ashes extra charge	Resident	155.00	160.00	3%	Rounding for efficiency of collection

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Burials	Interment Fees	Sunday burial of ashes extra charge	Resident	215.00	220.00	2%	
Environment	Burials	Interment Fees	Hand Digging Fee	Resident	535.00	545.00	2%	
Environment	Burials	Public Grave	Adult	Resident	295.00	300.00	2%	
Environment	Burials	Public Grave	Child 3-16 yrs	Resident	105.00	107.00	2%	
Environment	Burials	Public Grave	Baby to 3 yrs	Resident	65.00	66.00	2%	
Environment	Burials	Grave Unit	Purchase of Double vault including 1st Interment & 60 year lease	Resident	7,210.00	7,355.00	2%	
Environment	Burials	Grave Unit	Purchase of Double front lawn vault inc 1st Interment & 60 year lease	Resident	9,830.00	10,030.00	2%	
Environment	Burials	Mausolea	Purchase of VLA single unit and Interment (inc burial rights) all rows	Resident	6,260.00	6,260.00	NA	NA
Environment	Burials	Mausolea	Purchase of HRC single unit and Interment (inc burial rights) all rows	Resident	11,000.00	11,220.00	2%	
Environment	Burials	Mausolea	Interment Fees	Resident	895.00	915.00	2%	
Environment	Burials	Purchase in Reserve	Classic Grave Space 6.6 x2.6	Resident	2,030.00	2,070.00	2%	
Environment	Burials	Purchase in Reserve	7'x3' Grave Space	Resident	3,565.00	3,640.00	2%	
Environment	Burials	Purchase in Reserve	9'X4' Grave Space	Resident	3,800.00	3,890.00	2%	
Environment	Burials	Purchase in Reserve	Woodland Burial	Resident	3,445.00	3,515.00	2%	
Environment	Burials	Purchase in Reserve	Front lawn areas - 7x3 Grave Space	Resident	5,840.00	5,960.00	2%	
Environment	Burials	Purchase in Reserve	Front lawn areas - 9x4 Grave Space	Resident	9,040.00	9,220.00	2%	
Environment	Burials	Purchase in Reserve	Trent Park- Grave Space 8x5???	Resident	2,305.00	2,355.00	2%	
Environment	Burials	Purchase in Reserve	Children's Memorial Garden	Resident	655.00	670.00	2%	
Environment	Burials	Purchase in Reserve	Purchase of Double vault including 1st Interment & 60 year lease	Resident	10,820.00	11,040.00	2%	
Environment	Burials	Purchase in Reserve	Purchase of Double front lawn vault Inc. 1st Interment & 60 yr. lease	Resident	14,750.00	15,045.00	2%	
Environment	Burials	Purchase in Reserve	Purchase of single unit and Interment (Inc. burial rights)-1st and 3rd row	Resident	9,505.00	9,695.00	2%	
Environment	Burials	Purchase in Reserve	Purchase of single unit and Interment (Inc. burial rights)-2nd row	Resident	10,665.00	10,880.00	2%	
Environment	Burials	Renewal Of Grave Lease	Weekday extended service time in chapel (extra half hour)	Resident	110.00	112.00	2%	
Environment	Burials	Renewal Of Grave Lease	Weekend extended service time in chapel (extra half hour)	Resident	150.00	153.00	2%	
Environment	Burials	Renewal Of Grave Lease	Admin fee for 2 interment in niche at columbarium	Resident	25.00	25.50	2%	
Environment	Burials	Exhumation	First coffin - admin fee	Resident	505.00	515.00	2%	
Environment	Burials	Exhumation	Second coffin - admin fee	Resident	210.00	215.00	2%	
Environment	Burials	Exhumation	Ashes Exumation Fee First Interment	Resident	250.00	255.00	2%	
Environment	Burials	Exhumation	Additional Ashes Exumation Fee	Resident	150.00	153.00	2%	
Environment	Burials	Remove & Replace Memorial	Lawn style memorial up to 7'x3'	Resident	235.00	240.00	2%	
Environment	Burials	Remove & Replace Memorial	Traditional style memorial up to 7'x3'	Resident	355.00	365.00	3%	Rounding for efficiency of collection
Environment	Burials	Remove & Replace Memorial	Memorial Plaques	Resident	60.00	62.00	3%	Rounding for efficiency of collection
Environment	Burials	Remove & Replace Memorial	Ash Plot Memorial	Resident	60.00	62.00	3%	Rounding for efficiency of collection

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Burials	Remove & Replace Memorial	Memorial base	Resident	130.00	132.00	2%	
Environment	Burials	Memorial License Fees	Old section Grave Spaces (Traditional)	Resident	330.00	335.00	2%	
Environment	Burials	Memorial License Fees	Private Earthen Graves Lawn sections	Resident	230.00	235.00	2%	
Environment	Burials	Memorial License Fees	Common Graves	Resident	70.00	72.00	3%	Rounding for efficiency of collection
Environment	Burials	Memorial License Fees	Additional Memorial Work	Resident	80.00	82.00	3%	Rounding for efficiency of collection
Environment	Burials	Memorial License Fees	Annual clean	Resident	30.00	31.00	3%	Rounding for efficiency of collection
Environment	Burials	Memorial License Fees	Ash Plot	Resident	150.00	153.00	2%	
Environment	Burials	Miscellaneous	Burial of ashes - 16 yrs old and over	Resident	90.00	92.00	2%	
Environment	Burials	Miscellaneous	Burial of ashes - under 16 years	Resident	Free	Free	NA	NA
Environment	Burials	Miscellaneous	Scattering ashes from elsewhere (large casket)	Resident	75.00	77.00	3%	Rounding for efficiency of collection
Environment	Burials	Miscellaneous	Transfer Fee	Resident	50.00	52.00	4%	Rounding for efficiency of collection
Environment	Burials	Miscellaneous	Stone Removal 7*3	Resident	345.00	355.00	3%	Rounding for efficiency of collection
Environment	Burials	Miscellaneous	Stone Removal 7*3 Permit	Resident	325.00	332.00	2%	
Environment	Burials	Miscellaneous	Stone Removal headstone only	Resident	225.00	230.00	2%	
Environment	Burials	Miscellaneous	Stone Removal Headstone only Permit	Resident	235.00	240.00	2%	
Environment	Burials	Miscellaneous	Stone Removal 9*4 and over	Resident	Quote	Quote	NA	NA
Environment	Burials	Miscellaneous	Stone Removal 9*4 and over Permit	Resident	325.00	332.00	2%	
Environment	Burials	Miscellaneous	Certificate of Burial	Resident	30.00	31.00	3%	Rounding for efficiency of collection
Environment	Burials	Miscellaneous	Burial Record Search for up to 3	Resident	45.00	46.00	2%	
Environment	Burials	Miscellaneous	Database Record Search	Resident	15.00	16.00	7%	Rounding for efficiency of collection
Environment	Burials	Miscellaneous	Extending standard grave to allow for extra large coffin	Resident	70.00	72.00	3%	Rounding for efficiency of collection
Environment	Cremation	Cremation Services	Individual 16 years and over	Resident	655.00	670.00	2%	
Environment	Cremation	Cremation Services	Individual under 16 years	Resident	35.00	36.00	3%	Rounding for efficiency of collection
Environment	Cremation	Cremation Services	Early Morning Cremation	Resident	325.00	332.00	2%	
Environment	Cremation	Cremation Services	Double funeral service	Resident	780.00	795.00	2%	
Environment	Cremation	Cremation Services	Evenings and Saturday Cremation	Resident	810.00	827.00	2%	
Environment	Cremation	Cremation Services	Sunday Cremation	Resident	990.00	1,010.00	2%	
Environment	Cremation	Cremation Services	Weekday extended service time in chapel (extra half hour)	Resident	110.00	113.00	3%	Rounding for efficiency of collection
Environment	Cremation	Cremation Services	Weekend extended service time in chapel (extra half hour)	Resident	155.00	160.00	3%	Rounding for efficiency of collection
Environment	Cremation	Cremation Services	Direct Cremation	Resident	250.00	255.00	2%	
Environment	Cremation	Cremation Services	Contract Cremation	Resident	130.00	133.00	2%	
Environment	Cremation	Cremation Services	Use of Organist	Resident	70.00	72.00	3%	Rounding for efficiency of collection
Environment	Cremation	Audio-Visual System	Live Webcast	Resident	30.00	30.00	NA	NA
Environment	Cremation	Audio-Visual System	Live Webcast & Re-Watch again within 28 days	Resident	45.00	45.00	NA	NA
Environment	Cremation	Audio-Visual System	Webcast DVD/BluRay	Resident	50.00	50.00	NA	NA
Environment	Cremation	Audio-Visual System	Webcast CD	Resident	45.00	45.00	NA	NA
Environment	Cremation	Audio-Visual System	Webcast Additional DVD/BluRay (each)	Resident	35.00	35.00	NA	NA
Environment	Cremation	Audio-Visual System	Single Photo (continuously displayed throughout service)	Resident	12.00	12.00	NA	NA

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Cremation	Audio-Visual System	Simple slideshow (Max 25 photos-played once during service)	Resident	40.00	40.00	NA	NA
Environment	Cremation	Audio-Visual System	Professional Tribute (Max 25 photos-Set to a music track of choice-Played once during service)	Resident	70.00	70.00	NA	NA
Environment	Cremation	Audio-Visual System	Family supplied tribute	Resident	20.00	20.00	NA	NA
Environment	Cremation	Removal of Ashes	Holding Ashes on Temporary Deposit	Resident	20.00	20.00	NA	NA
Environment	Pet Cemetery	Pet Cemetery Fees	Large grave	Resident	585.00	596.00	2%	
Environment	Pet Cemetery	Pet Cemetery Fees	Medium grave	Resident	475.00	485.00	2%	
Environment	Pet Cemetery	Pet Cemetery Fees	Small grave	Resident	405.00	415.00	2%	
Environment	Pet Cemetery	Pet Cemetery Fees	Scattering of ashes	Resident	Free	Free	NA	NA
Environment	Pet Cemetery	Pet Cemetery Fees	Burial of ashes with marker	Resident	100.00	102.00	2%	
Environment	Hampstead Cemetery	Hampstead Cemetery	Interment Fee Traditional	Resident	1,640.00	1,673.00	2%	
Environment	Hampstead Cemetery	Hampstead Cemetery	Memorial Traditional	Resident	355.00	363.00	2%	
Environment	Hampstead Cemetery	Hampstead Cemetery	Interment Fee Lawn	Resident	1,640.00	1,672.00	2%	
Environment	Hampstead Cemetery	Hampstead Cemetery	Memorial Lawn	Resident	230.00	235.00	2%	
Environment	Hampstead Cemetery	Hampstead Cemetery	Turf Lawn	Resident	130.00	133.00	2%	
Environment	Burials	Private Grave	Classic Grave Space	Non-Resident	3,130.00	3,195.00	2%	
Environment	Burials	Private Grave	Classic Premium Grave Space	Non-Resident	2,830.00	2,890.00	2%	
Environment	Burials	Private Grave	7'x3' Grave Space	Non-Resident	4,170.00	4,255.00	2%	
Environment	Burials	Private Grave	9'x4' Grave Space	Non-Resident	4,685.00	4,780.00	2%	
Environment	Burials	Private Grave	Woodland Burial	Non-Resident	3,850.00	3,930.00	2%	
Environment	Burials	Private Grave	Front lawn areas - 7'x3' Grave Space	Non-Resident	6,970.00	7,110.00	2%	
Environment	Burials	Private Grave	Front lawn areas - 9'x4' Grave Space	Non-Resident	10,860.00	11,080.00	2%	
Environment	Burials	Private Grave	Trent Park- 8'x5' Grave Space	Non-Resident	4,850.00	4,950.00	2%	
Environment	Burials	Private Grave	Children's Memorial Garden	Non-Resident	910.00	930.00	2%	
Environment	Burials	Interment Fees	Individual 16 yrs and over- all cemeteries	Non-Resident	2,070.00	2,115.00	2%	
Environment	Burials	Interment Fees	Individual under 16 yrs	Non-Resident	885.00	905.00	2%	
Environment	Burials	Interment Fees	Front lawn areas - Adult	Non-Resident	3,900.00	3,980.00	2%	
Environment	Burials	Interment Fees	Front lawn areas - under 16 yrs	Non-Resident	1,630.00	1,665.00	2%	
Environment	Burials	Interment Fees	Saturday Burial extra charge	Non-Resident	750.00	765.00	2%	
Environment	Burials	Interment Fees	Sunday Burial extra charge	Non-Resident	960.00	980.00	2%	
Environment	Burials	Interment Fees	Saturday burial of ashes extra charge	Non-Resident	155.00	158.00	2%	
Environment	Burials	Interment Fees	Sunday burial of ashes extra charge	Non-Resident	215.00	220.00	2%	
Environment	Burials	Interment Fees	Hand Digging Fee	Non-Resident	535.00	545.00	2%	
Environment	Burials	Public Grave	Adult	Non-Resident	465.00	475.00	2%	
Environment	Burials	Public Grave	Child 3-16 yrs	Non-Resident	140.00	143.00	2%	
Environment	Burials	Public Grave	Baby to 3 yrs	Non-Resident	110.00	112.00	2%	
Environment	Burials	Grave Unit	Purchase of Double vault including 1st Interment & 60 year lease	Non-Resident	10,685.00	10,890.00	2%	
Environment	Burials	Grave Unit	Purchase of Double front lawn vault inc 1st Interment & 60 year lease	Non-Resident	15,060.00	15,360.00	2%	
Environment	Burials	Mausolea	Purchase of VLA single unit and Interment (inc burial rights) all rows	Non-Resident	9,295.00	9,480.00	2%	
Environment	Burials	Mausolea	Purchase of HRC single unit and Interment (inc burial rights) all rows	Non-Resident	13,000.00	13,260.00	2%	
Environment	Burials	Mausolea	Interment Fees	Non-Resident	895.00	912.00	2%	

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Burials	Purchase in Reserve	Classic Grave Space 6.6 x2.6	Non-Resident	4,685.00	4,780.00	2%	
Environment	Burials	Purchase in Reserve	7'x3' Grave Space	Non-Resident	6,250.00	6,375.00	2%	
Environment	Burials	Purchase in Reserve	9'X4' Grave Space	Non-Resident	7,040.00	7,180.80	2%	
Environment	Burials	Purchase in Reserve	Woodland Burial	Non-Resident	5,770.00	5,885.00	2%	
Environment	Burials	Purchase in Reserve	Front lawn areas - 7x3 Grave Space	Non-Resident	10,455.00	10,665.00	2%	
Environment	Burials	Purchase in Reserve	Front lawn areas - 9x4 Grave Space	Non-Resident	16,295.00	16,620.00	2%	
Environment	Burials	Purchase in Reserve	Trent Park- Grave Space 8x5???	Non-Resident	4,690.00	4,785.00	2%	
Environment	Burials	Purchase in Reserve	Children's Memorial Garden	Non-Resident	1,295.00	1,325.00	2%	
Environment	Burials	Purchase in Reserve	Purchase of Double vault including 1st Interment & 60 year lease	Non-Resident	16,030.00	16,350.00	2%	
Environment	Burials	Purchase in Reserve	Purchase of Double front lawn vault Inc. 1st Interment & 60 yr. lease	Non-Resident	22,600.00	23,050.00	2%	
Environment	Burials	Purchase in Reserve	Purchase of single unit and Interment (Inc. burial rights)-1st and 3rd row	Non-Resident	14,030.00	14,310.00	2%	
Environment	Burials	Purchase in Reserve	Purchase of single unit and Interment (Inc. burial rights)- 2nd row	Non-Resident	15,585.00	15,900.00	2%	
Environment	Burials	Renewal Of Grave Lease	Weekday extended service time in chapel (extra half hour)	Non-Resident	110.00	112.00	2%	
Environment	Burials	Renewal Of Grave Lease	Weekend extended service time in chapel (extra half hour)	Non-Resident	150.00	153.00	2%	
Environment	Burials	Renewal Of Grave Lease	Admin fee for 2 interment in niche at columbarium	Non-Resident	25.00	26.00	4%	Rounding for efficiency of collection
Environment	Burials	Exhumation	First coffin - admin fee	Non-Resident	505.00	515.00	2%	
Environment	Burials	Exhumation	Second coffin - admin fee	Non-Resident	210.00	215.00	2%	
Environment	Burials	Exhumation	Ashes Exumation Fee First Interment	Non-Resident	250.00	255.00	2%	
Environment	Burials	Exhumation	Additional Ashes Exumation Fee	Non-Resident	150.00	153.00	2%	
Environment	Burials	Remove & Replace Memorial	Lawn style memorial up to 7'x3'	Non-Resident	235.00	240.00	2%	
Environment	Burials	Remove & Replace Memorial	Traditional style memorial up to 7'x3'	Non-Resident	355.00	363.00	2%	
Environment	Burials	Remove & Replace Memorial	Memorial Plaques	Non-Resident	60.00	62.00	3%	Rounding for efficiency of collection
Environment	Burials	Remove & Replace Memorial	Ash Plot Memorial	Non-Resident	60.00	62.00	3%	Rounding for efficiency of collection
Environment	Burials	Remove & Replace Memorial	Memorial base	Non-Resident	260.00	265.00	2%	
Environment	Burials	Memorial License Fees	Old section Grave Spaces (Traditional)	Non-Resident	335.00	340.00	1%	Rounding for efficiency of collection
Environment	Burials	Memorial License Fees	Private Earthen Graves Lawn sections	Non-Resident	235.00	240.00	2%	
Environment	Burials	Memorial License Fees	Common Graves	Non-Resident	70.00	72.00	3%	Rounding for efficiency of collection
Environment	Burials	Memorial License Fees	Additional Memorial Work	Non-Resident	80.00	82.00	3%	Rounding for efficiency of collection
Environment	Burials	Memorial License Fees	Annual clean	Non-Resident	30.00	31.00	3%	Rounding for efficiency of collection
Environment	Burials	Memorial License Fees	Ash Plot	Non-Resident	150.00	153.00	2%	
Environment	Burials	Miscellaneous	Burial of ashes - 16 yrs old and over	Non-Resident	140.00	143.00	2%	
Environment	Burials	Miscellaneous	Burial of ashes - under 16 years	Non-Resident	Free	Free	NA	NA
Environment	Burials	Miscellaneous	Scattering ashes from elsewhere (large casket)	Non-Resident	75.00	77.00	3%	Rounding for efficiency of collection
Environment	Burials	Miscellaneous	Transfer Fee	Non-Resident	50.00	51.00	2%	

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Burials	Miscellaneous	Stone Removal 7*3	Non-Resident	350.00	357.00	2%	
Environment	Burials	Miscellaneous	Stone Removal 7*3 Permit	Non-Resident	325.00	332.00	2%	
Environment	Burials	Miscellaneous	Stone Removal headstone only	Non-Resident	225.00	230.00	2%	
Environment	Burials	Miscellaneous	Stone Removal Headstone only Permit	Non-Resident	240.00	245.00	2%	
Environment	Burials	Miscellaneous	Stone Removal 9*4 and over	Non-Resident	Quote	Quote	NA	NA
Environment	Burials	Miscellaneous	Stone Removal 9*4 and over Permit	Non-Resident	325.00	332.00	2%	
Environment	Burials	Miscellaneous	Certificate of Burial	Non-Resident	30.00	31.00	3%	Rounding for efficiency of collection
Environment	Burials	Miscellaneous	Burial Record Search for up to 3	Non-Resident	45.00	46.00	2%	
Environment	Burials	Miscellaneous	Database Record Search	Non-Resident	15.00	15.50	3%	Rounding for efficiency of collection
Environment	Burials	Miscellaneous	Extending standard grave to allow for extra large coffin	Non-Resident	135.00	138.00	2%	
Environment	Cremation	Cremation Services	Individual 16 years and over	Non-Resident	655.00	670.00	2%	
Environment	Cremation	Cremation Services	Individual under 16 years	Non-Resident	35.00	36.00	3%	Rounding for efficiency of collection
Environment	Cremation	Cremation Services	Early Morning Cremation	Non-Resident	325.00	332.00	2%	
Environment	Cremation	Cremation Services	Double funeral service	Non-Resident	780.00	795.00	2%	
Environment	Cremation	Cremation Services	Evenings and Saturday Cremation	Non-Resident	810.00	826.00	2%	
Environment	Cremation	Cremation Services	Sunday Cremation	Non-Resident	990.00	1,010.00	2%	
Environment	Cremation	Cremation Services	Weekday extended service time in chapel (extra half hour)	Non-Resident	110.00	112.00	2%	
Environment	Cremation	Cremation Services	Weekend extended service time in chapel (extra half hour)	Non-Resident	155.00	160.00	3%	Rounding for efficiency of collection
Environment	Cremation	Cremation Services	Direct Cremation	Non-Resident	250.00	255.00	2%	
Environment	Cremation	Cremation Services	Contract Cremation	Non-Resident	130.00	133.00	2%	
Environment	Cremation	Cremation Services	Use of Organist	Non-Resident	70.00	72.00	3%	Rounding for efficiency of collection
Environment	Cremation	Audio-Visual System	Live Webcast	Non-Resident	30.00	30.00	NA	NA
Environment	Cremation	Audio-Visual System	Live Webcast & Re-Watch again within 28 days	Non-Resident	45.00	45.00	NA	NA
Environment	Cremation	Audio-Visual System	Webcast DVD/BluRay	Non-Resident	50.00	50.00	NA	NA
Environment	Cremation	Audio-Visual System	Webcast CD	Non-Resident	45.00	45.00	NA	NA
Environment	Cremation	Audio-Visual System	Webcast Additional DVD/BluRay (each)	Non-Resident	35.00	35.00	NA	NA
Environment	Cremation	Audio-Visual System	Single Photo (continuously displayed throughout service)	Non-Resident	12.00	12.00	NA	NA
Environment	Cremation	Audio-Visual System	Simple slideshow (Max 25 photos-played once during service)	Non-Resident	40.00	40.00	NA	NA
Environment	Cremation	Audio-Visual System	Professional Tribute (Max 25 photos-Set to a music track of choice-Played once during service)	Non-Resident	70.00	70.00	NA	NA
Environment	Cremation	Audio-Visual System	Family supplied tribute	Non-Resident	20.00	20.00	NA	NA
Environment	Cremation	Removal of Ashes	Holding Ashes on Temporary Deposit	Non-Resident	20.00	21.00	5%	Rounding for efficiency of collection
Environment	Pet Cemetery	Pet Cemetery Fees	Large grave	Non-Resident	585.00	596.00	2%	
Environment	Pet Cemetery	Pet Cemetery Fees	Medium grave	Non-Resident	475.00	485.00	2%	
Environment	Pet Cemetery	Pet Cemetery Fees	Small grave	Non-Resident	405.00	415.00	2%	
Environment	Pet Cemetery	Pet Cemetery Fees	Scattering of ashes	Non-Resident	Free	Free	NA	NA
Environment	Pet Cemetery	Pet Cemetery Fees	Burial of ashes with marker	Non-Resident	100.00	102.00	2%	
Environment	Hampstead Cemetery	Hampstead Cemetery	Interment Fee Traditional	Non-Resident	2,425.00	2,475.00	2%	
Environment	Hampstead Cemetery	Hampstead Cemetery	Memorial Traditional	Non-Resident	340.00	345.00	1%	Rounding for efficiency of collection
Environment	Hampstead Cemetery	Hampstead Cemetery	Interment Fee Lawn	Non-Resident	2,425.00	2,475.00	2%	
Environment	Hampstead Cemetery	Hampstead Cemetery	Memorial Lawn	Non-Resident	230.00	235.00	2%	

**Appendix C1: Sales, Fees Charges 2022/23**

Directorate	Category	Fee/Charge Type	Fee/Charge Detail	Unit	2021/22 Price	2022/23 Price	% Change	Reason for not being uplift by 2%
Environment	Hampstead Cemetery	Hampstead Cemetery	Turf Lawn	Non-Resident	130.00	133.00	2%	
Environment	Cally Clock Tower Heritage Centre	Building hire	To Individuals & non-profit organisations	Per hour (weekdays)	30.60	31.21	2%	
Environment	Cally Clock Tower Heritage Centre	Building hire	To Individuals & non-profit organisations	Per hour (weekends)	51.00	52.02	2%	
Environment	Cally Clock Tower Heritage Centre	Building hire	To Individuals & non-profit organisations	Per day (weekday 8 hours max)	245.00	249.90	2%	
Environment	Cally Clock Tower Heritage Centre	Building hire	To Individuals & non-profit organisations	Per day (weekends 8 hours max)	408.00	416.16	2%	
Environment	Cally Clock Tower Heritage Centre	Equipment Charges	Slide projector		22.00	22.44	2%	
Environment	Cally Clock Tower Heritage Centre	Equipment Charges	Flip chart - per pad		8.50	8.67	2%	
Environment	Cally Clock Tower Heritage Centre	Equipment Charges	Digital Projector and Laptop		44.00	44.88	2%	
Environment	Cally Clock Tower Heritage Centre	Equipment Charges	Plasma Screen		17.50	17.85	2%	
Environment	LONDON LOCAL AUTHORITIES ACT 1991, PART II Special Treatments	Special Treatments	New Low/Standard Risk Special Treatment Licence	Per Application	442.00	450.00	2%	
Environment	LONDON LOCAL AUTHORITIES ACT 1991, PART II Special Treatments	Special Treatments	New High Risk Special Treatment Licence	Per Application	780.00	795.00	2%	
Environment	LONDON LOCAL AUTHORITIES ACT 1991, PART II Special Treatments	Special Treatments	Renewal Low/Standard Risk Special Treatment Licence	Per Application	341.00	347.00	2%	
Environment	LONDON LOCAL AUTHORITIES ACT 1991, PART II Special Treatments	Special Treatments	Renewal High Risk Special Treatment Licence	Per Application	682.00	695.00	2%	
Environment	LONDON LOCAL AUTHORITIES ACT 1991, PART II Special Treatments	Special Treatments	Occasional Special Treatment Licence	Per Application	243.00	247.00	2%	
Environment	LONDON LOCAL AUTHORITIES ACT 1991, PART II Special Treatments	Special Treatments	Variation of Special Treatment Licence	Per Application	227.00	231.00	2%	
Environment	LONDON LOCAL AUTHORITIES ACT 1991, PART II Special Treatments	Special Treatments	Addition of Simmilar treatment to Special Treatment Licence	Per Application	48.00	49.00	2%	
Environment	LONDON LOCAL AUTHORITIES ACT 1991, PART II Special Treatments	Special Treatments	Transfer of Special Treatment Licence	Per Application	130.00	132.00	2%	
Environment	LONDON LOCAL AUTHORITIES ACT 1991, PART II Special Treatments	Special Treatments	Change of Details on Special Treatment Licence	Per Application	16.00	16.50	3%	Rounding for efficiency of collection
Environment	LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1982 Sex Establishments	Sex Establishments	New SEV application	Per Application	7,845.00	8,000.00	2%	
Environment	LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1982 Sex Establishments	Sex Establishments	Renewal SEV application	Per Application	2,680.00	2,733.00	2%	
Environment	LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1982 Sex Establishments	Sex Establishments	Transfer SEV Application	Per Application	200.00	204.00	2%	
Environment	LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1982 Sex Establishments	Sex Establishments	Variation SEV Appliaction	Per Application	4,106.00	4,188.00	2%	
Environment	LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1982 Sex Establishments	Sex Establishments	Refund for Refused SEV Application	Per Application	-1,345.00	-1,370.00	2%	

Appendix C2: GLL Activity Prices 2022/23

Department	Fee/Charge	Description/Unit	Better H&F over 60			Better H&F Adult Con			Better H&F Adult Non Member			Better H&F Adult			Better H&F Jnr Non Mem			Better H&F Junior			Better H&F Jnr Con		
			2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change
Activities	Badminton	Adult Club/League	£ 5.55	£ 5.65	2%	£ 5.55	£ 5.65	2%	£ 8.35	£ 8.60	3%	£ 5.70	£ 5.85	3%	£ -	£ -	0%	£ 4.60	£ 4.75	3%	£ -	£ -	0%
Activities	Badminton	Club/Club	£ 7.05	£ 7.20	2%	£ 7.05	£ 7.20	2%	£ 9.20	£ 9.50	3%	£ 7.90	£ 8.15	3%	£ -	£ -	0%	£ 5.90	£ 6.10	3%	£ -	£ -	0%
Activities	Badminton	Course x five	£ 49.60	£ 50.60	2%	£ 49.60	£ 50.60	2%	£ 59.00	£ 60.80	3%	£ 51.95	£ 53.50	3%	£ -	£ -	0%	£ 50.00	£ 51.50	3%	£ -	£ -	0%
Activities	Badminton	Court 55 minutes: Off peak	£ 8.10	£ 8.25	2%	£ 9.05	£ 9.25	2%	£ 11.30	£ 11.65	3%	£ 9.50	£ 9.80	3%	£ -	£ -	0%	£ 9.00	£ 9.30	3%	£ -	£ -	0%
Activities	Badminton	Court 55 minutes: Peak	£ 12.95	£ 13.20	2%	£ 13.05	£ 13.30	2%	£ 16.60	£ 17.10	3%	£ 13.70	£ 14.10	3%	£ -	£ -	0%	£ 13.30	£ 13.70	3%	£ -	£ -	0%
Activities	Badminton	Junior Clinic/ Club 2 hrs	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 5.70	£ 5.85	3%	£ -	£ -	0%	£ 3.25	£ 3.30	2%
Activities	Badminton	Racket hire	£ 2.55	£ 2.60	2%	£ 2.50	£ 2.55	2%	£ 2.65	£ 2.75	4%	£ 2.70	£ 2.80	4%	£ 2.60	£ 2.65	2%	£ 2.60	£ 2.70	4%	£ 2.55	£ 2.60	2%
Activities	Basketball	11hr Basketball	£ 84.45	£ 86.15	2%	£ 84.50	£ 86.20	2%	£ 100.45	£ 103.45	3%	£ 88.65	£ 91.30	3%	£ 97.75	£ 100.70	3%	£ 86.20	£ 88.80	3%	£ 84.55	£ 86.25	2%
Activities	Basketball	2hr open session- Sobell	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 5.70	£ 5.85	3%	£ 4.50	£ 4.65	3%	£ 3.25	£ 3.30	2%
Activities	Basketball	Basketball at Finsbury	£ 56.25	£ 57.40	2%	£ 56.25	£ 57.40	2%	£ 70.90	£ 73.05	3%	£ 59.00	£ 60.75	3%	£ 68.95	£ 71.00	3%	£ 56.85	£ 58.55	3%	£ 56.30	£ 57.45	2%
Activities	Basketball	Block Booking at Sobell	£ 84.50	£ 86.20	2%	£ 84.45	£ 86.15	2%	£ 100.45	£ 103.45	3%	£ 88.65	£ 91.30	3%	£ 95.80	£ 98.70	3%	£ 85.40	£ 87.85	3%	£ 84.55	£ 86.25	2%
Activities	Classes	Aerobics 55 Mins: Off-peak	£ 2.35	£ 2.40	2%	£ 3.70	£ 3.75	1%	£ 7.95	£ 8.20	3%	£ 6.15	£ 6.35	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Classes	Aerobics 55 Mins: Peak	£ 2.95	£ 3.00	2%	£ 4.99	£ 5.10	2%	£ 9.50	£ 9.80	3%	£ 7.75	£ 8.00	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Classes	Aerobics 55+ mins: Off-peak	£ 2.85	£ 2.90	2%	£ 4.75	£ 4.85	2%	£ 8.95	£ 9.20	3%	£ 7.75	£ 8.00	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Classes	Aerobics 55+ mins: Peak	£ 3.05	£ 3.10	2%	£ 4.85	£ 4.95	2%	£ 10.25	£ 10.55	3%	£ 8.60	£ 8.85	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Classes	Mind and Body 1hour+ Off-peak	£ 2.85	£ 2.90	2%	£ 5.10	£ 5.20	2%	£ 9.75	£ 10.05	3%	£ 8.45	£ 8.70	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Classes	Mind and Body 1 hour+ : Peak	£ 3.05	£ 3.10	2%	£ 5.60	£ 5.70	2%	£ 11.65	£ 12.00	3%	£ 9.90	£ 10.20	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Classes	Running Club	£ 2.85	£ 2.90	2%	£ -	£ -	0%	£ 4.80	£ 4.95	3%	£ 3.60	£ 3.70	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Gym Session	Gym with swim: peak- Inclusive	£ -	£ -	0%	£ 4.99	£ 5.10	2%	£ 8.50	£ 8.75	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Gym Session	Cally Gym with Swim- Off peak	£ -	£ -	0%	£ 2.85	£ 2.90	2%	£ 6.30	£ 6.50	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Gym Session	Cally Gym with Swim- peak	£ 2.85	£ 2.90	2%	£ 3.95	£ 4.00	1%	£ 6.30	£ 6.50	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Gym Session	Gym with swim: off-peak	£ 2.35	£ 2.40	2%	£ 3.90	£ 3.95	1%	£ 8.50	£ 8.75	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Gym Session	Gym with swim: Peak	£ 2.85	£ 2.90	2%	£ 4.94	£ 5.05	2%	£ 5.35	£ 5.50	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Gym Session	Non Member day membership Cally	£ -	£ -	0%	£ -	£ -	0%	£ 11.35	£ 11.70	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Gym Session	Non Member day membership Highbury	£ -	£ -	0%	£ -	£ -	0%	£ 11.35	£ 11.70	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Gym Session	Non Member day membership Other Gym	£ -	£ -	0%	£ -	£ -	0%	£ 11.35	£ 11.70	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Ice Rink	After School Session	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 5.70	£ 5.85	3%	£ 4.50	£ 4.65	3%	£ 3.25	£ 3.30	2%
Activities	Ice Rink	Under 5's	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 3.40	£ 3.50	3%	£ 2.30	£ 2.40	4%	£ 1.90	£ 1.90	0%
Activities	Ice Rink	Skate Hire	£ -	£ -	0%	£ -	£ -	0%	£ 1.45	£ 1.50	3%	£ -	£ -	0%	£ 1.45	£ 1.50	3%	£ -	£ -	0%	£ -	£ -	0%
Activities	Ice Rink	Skating per session	£ -	£ -	0%	£ 4.00	£ 4.10	2%	£ 7.15	£ 7.35	3%	£ 4.80	£ 4.95	3%	£ 5.70	£ 5.85	3%	£ 4.50	£ 4.65	3%	£ 3.25	£ 3.30	2%
Activities	Sauna Session	Sauna	£ 2.90	£ 2.95	2%	£ 4.94	£ 5.05	2%	£ 9.50	£ 9.80	3%	£ 7.70	£ 7.95	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Sauna Session	Sauna Partial Session	£ 2.35	£ 2.40	2%	£ 4.99	£ 5.10	2%	£ 7.05	£ 7.25	3%	£ 6.30	£ 6.50	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Swimming	Aqua Classes 55min	£ 1.00	£ 1.00	0%	£ 3.90	£ 3.95	1%	£ 7.95	£ 8.20	3%	£ 5.90	£ 6.10	3%	£ 4.55	£ 4.70	3%	£ 3.40	£ 3.50	3%	£ 2.55	£ 2.60	2%
Activities	Swimming	Casual/Lane Swim	£ 1.00	£ 1.00	0%	£ 2.50	£ 2.55	2%	£ 5.20	£ 5.35	3%	£ 4.30	£ 4.45	3%	£ 2.90	£ 3.00	3%	£ 1.00	£ 1.00	0%	£ -	£ -	0%
Activities	Swimming	Over 60's Free Swimming	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Swimming	Swim For A Pound	£ -	£ -	0%	£ -	£ -	0%	£ 1.00	£ 1.05	5%	£ -	£ -	0%	£ -	£ -	0%	£ 1.00	£ 1.00	0%	£ -	£ -	0%
Activities	Swimming	Aqua Card Monthly DD	£ -	£ -	0%	£ -	£ -	0%	£ 33.50	£ 34.50	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Swimming Lessons	Adult Lessons 30mins- Annual (IRB)	£ -	£ -	0%	£ 4.80	£ 4.90	2%	£ -	£ -	0%	£ 6.10	£ 6.30	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Swimming Lessons	Adult Lessons 30mins - DD (IRB)	£ -	£ -	0%	£ 4.90	£ 5.00	2%	£ -	£ -	0%	£ 6.55	£ 6.75	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Swimming Lessons	Adult lessons 30mins - Peak	£ -	£ -	0%	£ 2.25	£ 2.30	2%	£ 5.05	£ 5.20	3%	£ 3.65	£ 3.75	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Swimming Lessons	Adult Lesson 30 mins - Off Peak	£ -	£ -	0%	£ 2.35	£ 2.40	2%	£ -	£ -	0%	£ 2.50	£ 2.60	4%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Swimming Lessons	Adult Lessons 60 mins	£ -	£ -	0%	£ 5.60	£ 5.70	2%	£ -	£ -	0%	£ 5.95	£ 6.10	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Swimming Lessons	Junior lesson's 30mins -STD	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 5.20	£ 5.35	3%	£ 4.00	£ 4.10	2%
Activities	Swimming Lessons	Junior lessons 30min DD	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 4.80	£ 4.95	3%	£ 3.65	£ 3.70	1%
Activities	Swimming Lessons	Junior lessons 30min annual	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 4.80	£ 4.95	3%	£ 3.65	£ 3.70	1%
Activities	Swimming Lessons	Junior lessons 45min STD	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 7.95	£ 8.20	3%	£ 6.00	£ 6.10	2%
Activities	Swimming Lessons	Junior lessons 45min - DD	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 7.45	£ 7.70	3%	£ 5.60	£ 5.20	-7%
Activities	Swimming Lessons	Junior lessons 45mins- annual	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 7.20	£ 7.40	3%	£ 5.40	£ 5.50	2%
Activities	Swimming Lessons	National Pool Lifeguards	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 243.55	£ 250.85	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Table Tennis	Adult Drop in (IRB)	£ -	£ -	0%	£ 4.70	£ 4.80	2%	£ 7.05	£ 7.25	3%	£ 5.55	£ 5.70	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Table Tennis	Bar Hire	£ -	£ -	0%	£ 2.60	£ 2.65	2%	£ 2.80	£ 2.90	4%	£ 2.80	£ 2.90	4%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Table Tennis	Court booking	£ 5.30	£ 5.40	2%	£ 5.30	£ 5.40	2%	£ 7.75	£ 8.00	3%	£ 5.55	£ 5.70	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Table Tennis	Junior drop in	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 5.60	£ 5.75	3%	£ -	£ -	0%	£ 4.35	£ 4.45	2%
Activities	Table Tennis	Casual Coached Session</																					

Appendix C2: GLL Activity Prices 2022/23

Department	Fee/Charge	Description/Unit	Better H&F over 60			Better H&F Adult Con			Better H&F Adult Non Member			Better H&F Adult			Better H&F Jnr Non Mem			Better H&F Junior			Better H&F Jnr Con		
			2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change
Activities	Tennis Courses	Indoor Junior- Green	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 11.15	£ 11.70	5%	£ 9.80	£ 10.30	5%	£ 5.80	£ 5.90	2%
Activities	Tennis Courses	Indoor Junior- orange	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 10.60	£ 11.15	5%	£ 9.35	£ 9.80	5%	£ 5.20	£ 5.30	2%
Activities	Tennis Courses	Indoor Junior- Red	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 10.50	£ 11.05	5%	£ 8.60	£ 9.05	5%	£ 4.70	£ 4.80	2%
Activities	Tennis Courses	Indoor Tots	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 4.20	£ 4.35	4%	£ 2.85	£ 2.90	2%
Activities	Tennis Courses	Indoor Junior Holiday Camp Over 9s	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 8.05	£ 8.30	3%	£ 6.80	£ 7.00	3%	£ 3.70	£ 3.75	1%
Activities	Tennis Courses	Indoor Junior Holiday Camp Under 9s	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 8.65	£ 8.90	3%	£ 7.30	£ 7.50	3%	£ 4.10	£ 4.20	2%
Activities	Tennis Courses	Outdoor Adult	£ -	£ -	0%	£ -	£ -	0%	£ 14.20	£ 14.65	3%	£ 12.45	£ 12.80	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Tennis Courses	Racquet Hire	£ -	£ -	0%	£ -	£ -	0%	£ 2.65	£ 2.75	4%	£ 2.70	£ 2.80	4%	£ 1.10	£ 1.10	0%	£ 1.10	£ 1.10	0%	£ -	£ -	0%
Activities	Tennis Courses	Teen Tennis	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 10.90	£ 11.25	3%	£ 9.65	£ 9.95	3%	£ 5.80	£ 5.90	2%
Activities	Tennis Indoor Bookings	Adult Playing with Concession/ Child Off	£ -	£ -	0%	£ -	£ -	0%	£ 13.70	£ 14.10	3%	£ 13.50	£ 13.90	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Tennis Indoor Bookings	Tennis Centre	£ -	£ -	0%	£ 6.70	£ 6.80	1%	£ 30.00	£ 30.90	3%	£ 26.65	£ 27.45	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Tennis Indoor Bookings	Tennis : 7am-6pm + w/e	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 13.30	£ 13.70	3%	£ 10.80	£ 11.10	3%	£ -	£ -	0%
Activities	Tennis Indoor Bookings	Tennis: off-peak	£ -	£ -	0%	£ 6.40	£ 6.55	2%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 6.65	£ 6.85	3%	£ -	£ -	0%
Activities	Tennis Indoor Bookings	Tennis: Vacant Court	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 5.70	£ 5.90	4%	£ 4.60	£ 4.75	3%	£ -	£ -	0%
Activities	Tennis Outdoor bookings	Adult playing with Concession/ Child off	£ -	£ -	0%	£ -	£ -	0%	£ 6.60	£ 6.80	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Tennis Outdoor bookings	Tennis	£ -	£ -	0%	£ -	£ -	0%	£ 11.10	£ 11.45	3%	£ 9.55	£ 9.85	3%	£ 5.00	£ 5.15	3%	£ 4.00	£ 4.10	2%	£ -	£ -	0%
Activities	Tennis Outdoor bookings	Tennis : 7am-6pm + w/e	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 5.10	£ 5.25	3%	£ 4.05	£ 4.20	4%	£ -	£ -	0%
Activities	Trampoline	FLC Junior over 60mins	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 6.00	£ 6.20	3%	£ 4.70	£ 4.85	3%	£ 3.35	£ 3.40	1%
Activities	Trampoline	SLC Juner over 60 mins	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 5.45	£ 5.60	3%	£ 4.35	£ 4.50	3%	£ 3.20	£ 3.25	2%
Activities	Trampoline	SLC Adult 120min (over 90)	£ 7.55	£ 7.70	2%	£ 7.40	£ 7.55	2%	£ 9.20	£ 9.50	3%	£ 7.85	£ 8.10	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Trampoline	SLC Adult up to 90min	£ 6.30	£ 6.45	2%	£ 6.30	£ 6.40	2%	£ 7.80	£ 8.05	3%	£ 6.55	£ 6.75	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Trampoline	SLC Squad Adult	£ 7.55	£ 7.70	2%	£ 7.40	£ 7.55	2%	£ 9.20	£ 9.50	3%	£ 7.85	£ 8.10	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Activities	Trampoline	SLC Squad Junior	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 5.45	£ 5.60	3%	£ 4.40	£ 4.55	3%	£ 3.15	£ 3.20	2%
Activities	Trampoline	Special Needs	£ -	£ -	0%	£ 3.20	£ 3.25	2%	£ 5.55	£ 5.70	3%	£ 4.45	£ 4.60	3%	£ -	£ -	0%	£ -	£ -	0%	£ 3.10	£ 3.15	2%
Memberships	Pay and Play Borough Card (Previously Known as Izz Card)	Annual- 60 plus	£ -	£ -	0%	£ -	£ -	0%	£ 5.80	£ 6.00	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Memberships	Pay and Play Borough Card (Previously Known as Izz Card)	Annual- Concession	£ -	£ -	0%	£ -	£ -	0%	£ 28.95	£ 29.80	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Memberships	Pay and Play Borough Card (Previously Known as Izz Card)	Annual- Junior	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 11.50	£ 11.85	3%	£ -	£ -	0%	£ -	£ -	0%
Memberships	Pay and Play Borough Card (Previously Known as Izz Card)	Annual-Junior Concession	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ 5.75	£ 5.90	3%	£ -	£ -	0%	£ -	£ -	0%
Memberships	Pay and Play Borough Card (Previously Known as Izz Card)	Annual- Regular	£ -	£ -	0%	£ -	£ -	0%	£ 61.45	£ 63.30	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Archway	Pool: hour	£ -	£ -	0%	£ -	£ -	0%	£ 342.50	£ 352.80	3%	£ 295.10	£ 303.95	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Archway	Daytime swim: peak (60+)	£ 1.00	£ 1.00	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Archway	Fun and waves	£ 1.00	£ 1.00	0%	£ -	£ -	0%	£ 6.30	£ 6.50	3%	£ 4.55	£ 4.70	3%	£ 3.10	£ 3.20	3%	£ 1.55	£ 1.60	3%	£ -	£ -	0%
Centres	Archway	Lane Swimming	£ -	£ -	0%	£ 2.50	£ 2.55	2%	£ 5.45	£ 5.60	3%	£ 4.20	£ 4.35	4%	£ 2.90	£ 3.00	3%	£ 1.55	£ 1.60	3%	£ -	£ -	0%
Centres	Cally	Main Pool: 1hr: CAL	£ -	£ -	0%	£ 2.55	£ 2.60	2%	£ 96.80	£ 99.70	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Cally	Main Pool: 1hr: CAL- Anaconda	£ -	£ -	0%	£ -	£ -	0%	£ 74.40	£ 76.65	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Cally	Party Pool Hire: additional fee: CAL	£ -	£ -	0%	£ -	£ -	0%	£ 21.90	£ 22.55	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Cally	Training Pool: 1hr: CAL- Anaconda	£ -	£ -	0%	£ -	£ -	0%	£ 54.40	£ 56.05	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Cally	Training Pool: 1hr: CAL	£ -	£ -	0%	£ -	£ -	0%	£ 73.25	£ 75.45	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Cally	Main Pool	£ -	£ -	0%	£ -	£ -	0%	£ 159.45	£ 164.20	3%	£ 123.90	£ 127.60	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Cally	Shallow Pool	£ -	£ -	0%	£ -	£ -	0%	£ 112.20	£ 115.60	3%	£ 88.60	£ 91.25	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Cally	Cally Master/ Premier Swim	£ 2.45	£ 2.50	2%	£ -	£ -	0%	£ 6.05	£ 6.25	3%	£ 4.10	£ 4.20	2%	£ 2.85	£ 2.95	4%	£ 1.00	£ 1.00	0%	£ 1.00	£ 1.00	0%
Centres	Cally	Parent And Toddler	£ 4.10	£ 4.20	2%	£ 2.40	£ 2.45	2%	£ 6.60	£ 6.80	3%	£ 5.45	£ 5.60	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Finsbury	Activity Room- Day Rate	£ -	£ -	0%	£ 3.90	£ 3.95	1%	£ 200.70	£ 206.70	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Finsbury	Activity Room- Per hour	£ -	£ -	0%	£ -	£ -	0%	£ 43.70	£ 45.00	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Finsbury	Basement Sport: 1hr: Finsbury	£ -	£ -	0%	£ -	£ -	0%	£ 55.00	£ 56.65	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Finsbury	DOJO Hire: per hour	£ -	£ -	0%	£ -	£ -	0%	£ 31.25	£ 32.20	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Finsbury	Main Studio- day rate	£ -	£ -	0%	£ -	£ -	0%	£ 236.15	£ 243.20	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Finsbury	Main Studio - Per hour	£ -	£ -	0%	£ -	£ -	0%	£ 56.65	£ 58.35	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Finsbury	Meeting Room: Community Use	£ -	£ -	0%	£ -	£ -	0%	£ 23.65	£ 24.35	3%	£ 11.85	£ 12.20	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Finsbury	Treatment Room	£ -	£ -	0%	£ -	£ -	0%	£ 38.40	£ 39.55	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Finsbury	Bourne Castle	£ -	£ -	0%	£ -	£ -	0%	£ 61.45	£ 63.30	3%	£ 53.10	£ 54.70	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Finsbury	Football	£ -	£ -	0%	£ -	£ -	0%	£ 61.45	£ 63.30	3%	£ 53.10	£ 54.70	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Finsbury	Party Room	£ -	£ -	0%	£ -	£ -	0%	£ 37.85	£ 39.00	3%	£ 32.00	£ 32.95	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Finsbury	5 A-Side Football League	£ 412.70	£ 420.95	2%	£ -	£ -	0%	£ 443.90	£ 457.20	3%	£ 432.60	£ 445.60	3%	£ -	£ -	0%	£ -	£ -	0%	£ -	£ -	0%
Centres	Finsbury	6 A-side Evening League- Per evening	£ 482.50	£ 492.15	2%	£ 412.70	£ 420.95	2%	£ 517.60	£ 533.15	3%	£ 505.75	£ 520.90	3%									

Appendix C2: GLL Activity Prices 2022/23

Department	Fee/Charge	Description/Unit	Better H&F over 60			Better H&F Adult Con			Better H&F Adult Non Member			Better H&F Adult			Better H&F Jnr Non Mem			Better H&F Junior			Better H&F Jnr Con																
			2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change														
Centres	Finsbury	Small Pitch Junior 45 min: Off-peak	£	-	£	-	0%	£	73.25	£	74.70	2%	£	-	£	-	0%	£	29.70	£	30.60	3%	£	26.05	£	26.85	3%	£	25.60	£	26.10	2%					
Centres	Finsbury	Small Pitch Off-peak weekends	£	54.70	£	55.80	2%	£	-	£	-	0%	£	63.40	£	65.30	3%	£	57.30	£	59.00	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Finsbury	Squash Clinic-Finsbury	£	5.40	£	5.50	2%	£	54.70	£	55.80	2%	£	7.75	£	8.00	3%	£	5.70	£	5.90	4%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Finsbury	Court 40min:FLC: Off-peak	£	8.80	£	9.00	2%	£	5.40	£	5.50	2%	£	11.25	£	11.60	3%	£	9.20	£	9.50	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Finsbury	Court 40min:FLC: Peak	£	10.50	£	10.70	2%	£	8.80	£	9.00	2%	£	13.65	£	14.05	3%	£	11.00	£	11.35	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Finsbury	Sport Session (Finsbury)	£	-	£	-	0%	£	10.50	£	10.70	2%	£	-	£	-	0%	£	-	£	-	0%	£	5.60	£	5.80	4%	£	4.55	£	4.70	3%	£	2.20	£	2.25	2%
Centres	IRB	Main pool hire	£	-	£	-	0%	£	-	£	-	0%	£	96.90	£	99.80	3%	£	-	£	-	0%	£	-	£	-	0%	£	-	£	-	0%					
Centres	IRB	Teaching pool hire	£	-	£	-	0%	£	-	£	-	0%	£	73.25	£	75.45	3%	£	-	£	-	0%	£	-	£	-	0%	£	-	£	-	0%					
Centres	IRB	Self Service 7kg wash	£	-	£	-	0%	£	-	£	-	0%	£	7.70	£	7.95	3%	£	6.90	£	7.10	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	IRB	Self Service 16kg wash	£	-	£	-	0%	£	4.99	£	5.10	2%	£	11.00	£	11.35	3%	£	9.85	£	10.15	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	IRB	Self Service Dry	£	-	£	-	0%	£	7.30	£	7.45	2%	£	3.85	£	4.00	4%	£	2.15	£	2.20	2%	£	-	£	-	0%	£	-	£	-	0%					
Centres	IRB	Ironing service 5 Item	£	-	£	-	0%	£	1.65	£	1.70	3%	£	4.20	£	4.35	4%	£	4.20	£	4.35	4%	£	-	£	-	0%	£	-	£	-	0%					
Centres	IRB	SPA London	£	9.95	£	10.15	2%	£	2.60	£	2.85	2%	£	26.80	£	27.60	3%	£	-	£	-	0%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Tennis Centre	Studio: 1hr Off-peak	£	-	£	-	0%	£	9.69	£	9.90	2%	£	32.00	£	32.95	3%	£	-	£	-	0%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Tennis Centre	Studio: 1hr Peak	£	-	£	-	0%	£	-	£	-	0%	£	37.85	£	39.00	3%	£	-	£	-	0%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Market Road	Adult one hour full pitch off-peak	£	51.20	£	52.20	2%	£	-	£	-	0%	£	61.25	£	63.10	3%	£	53.80	£	55.40	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Market Road	Adult one hour full pitch peak	£	87.30	£	89.05	2%	£	51.20	£	52.20	2%	£	103.50	£	106.60	3%	£	91.50	£	94.25	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Market Road	Block Bookings	£	-	£	-	0%	£	87.30	£	89.05	2%	£	81.70	£	84.15	3%	£	-	£	-	0%	£	40.85	£	42.10	3%	£	-	£	-	0%					
Centres	Market Road	Football Hire	£	-	£	-	0%	£	-	£	-	0%	£	3.50	£	3.60	3%	£	-	£	-	0%	£	3.50	£	3.60	3%	£	-	£	-	0%					
Centres	Market Road	Junior one hour full pitch peak	£	-	£	-	0%	£	-	£	-	0%	£	-	£	-	0%	£	-	£	-	0%	£	61.70	£	63.55	3%	£	48.00	£	49.45	3%	£	47.55	£	48.50	2%
Centres	Market Road	Outdoor 5 a side 60min	£	67.50	£	68.85	2%	£	-	£	-	0%	£	82.75	£	85.25	3%	£	70.80	£	72.90	3%	£	39.55	£	40.75	3%	£	33.50	£	34.50	3%	£	-	£	-	0%
Centres	Sobell	Martial Arts	£	-	£	-	0%	£	67.50	£	68.85	2%	£	29.45	£	30.35	3%	£	-	£	-	0%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	Outdoor 5 a side 60min	£	67.70	£	69.05	2%	£	-	£	-	0%	£	82.75	£	85.25	3%	£	70.80	£	72.90	3%	£	39.55	£	40.75	3%	£	33.50	£	34.50	3%	£	-	£	-	0%
Centres	Sobell	Judo room: 1 hr	£	-	£	-	0%	£	67.50	£	68.85	2%	£	36.60	£	37.70	3%	£	-	£	-	0%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	Rink Hire: 1 hour	£	-	£	-	0%	£	-	£	-	0%	£	130.00	£	133.90	3%	£	111.25	£	114.60	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	Studio 1hr - SLC	£	-	£	-	0%	£	-	£	-	0%	£	49.85	£	51.35	3%	£	-	£	-	0%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	Studio- Day rate	£	-	£	-	0%	£	-	£	-	0%	£	236.25	£	243.35	3%	£	-	£	-	0%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	VIP Suite- Commercial Rate per session	£	-	£	-	0%	£	-	£	-	0%	£	236.25	£	243.35	3%	£	-	£	-	0%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	VIP suites- Community Use per session	£	-	£	-	0%	£	-	£	-	0%	£	23.60	£	24.30	3%	£	11.85	£	12.20	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	Bouncy Castle & catering room	£	-	£	-	0%	£	-	£	-	0%	£	159.35	£	164.15	3%	£	138.25	£	142.40	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	Ice Rink	£	-	£	-	0%	£	-	£	-	0%	£	236.15	£	243.25	3%	£	212.75	£	219.15	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	Soft Play: Off peak	£	-	£	-	0%	£	-	£	-	0%	£	141.70	£	145.95	3%	£	123.95	£	127.70	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	Soft Play: Peak	£	-	£	-	0%	£	-	£	-	0%	£	224.10	£	230.80	3%	£	200.60	£	206.60	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	Sports party & catering	£	-	£	-	0%	£	-	£	-	0%	£	159.40	£	164.20	3%	£	141.75	£	146.00	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	Trampoline & catering	£	-	£	-	0%	£	-	£	-	0%	£	159.40	£	164.20	3%	£	141.75	£	146.00	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	Zumba tonic Dance Parties	£	-	£	-	0%	£	-	£	-	0%	£	159.40	£	164.20	3%	£	141.75	£	146.00	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	Squash Clinic- Sobell	£	7.15	£	7.30	2%	£	-	£	-	0%	£	8.90	£	9.20	3%	£	7.50	£	7.75	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	Court 40min:SLC: Off-peak	£	5.30	£	5.40	2%	£	7.10	£	7.25	2%	£	9.55	£	9.85	3%	£	5.35	£	5.50	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	Court 40min:SLC: Peak	£	10.50	£	10.70	2%	£	5.20	£	5.30	2%	£	13.70	£	14.10	3%	£	11.00	£	11.35	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	League Players Per Person	£	5.95	£	6.05	2%	£	10.50	£	10.70	2%	£	7.75	£	8.00	3%	£	6.35	£	6.55	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	Racket hire	£	2.55	£	2.60	2%	£	5.95	£	6.05	2%	£	2.70	£	2.80	4%	£	2.70	£	2.80	4%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	Football Hire	£	-	£	-	0%	£	2.50	£	2.55	2%	£	3.55	£	3.65	3%	£	-	£	-	0%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	Main Hall 60min	£	84.60	£	86.30	2%	£	-	£	-	0%	£	100.45	£	103.45	3%	£	88.65	£	91.30	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	Outdoor 60min	£	67.50	£	68.85	2%	£	84.55	£	86.25	2%	£	82.75	£	85.25	3%	£	70.60	£	72.70	3%	£	-	£	-	0%	£	-	£	-	0%					
Centres	Sobell	Junior Gym	£	-	£	-	0%	£	67.50	£	68.85	2%	£	-	£	-	0%	£	-	£	-	0%	£	5.60	£	5.80	4%	£	4.50	£	4.65	3%	£	3.25	£	3.30	2%
Centres	Sobell	Sport session	£	-	£</																																

**Appendix C3: GLL Memberships 2022/23**

	Prepaid Memberships									Swimming Lesson					
	Monthly			Annual			Joining Fees			Monthly			1-1 Lessons		
	2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change	2021/22 Price	2022/23 Price	% Change
60+	£20.90	£20.90	0%	£225.70	£225.70	0%	£25.00	£10.00	-60%	-	-	0%	-	-	0%
Adult Concession	£30.60	£30.60	0%	£330.50	£330.50	0%	£15.00	£10.00	-33%	£20.90	£21.75	4%	£25.50	£26.25	3%
Adult (BHF)	£51.45	£51.45	0%	£555.65	£555.65	0%	£25.00	£10.00	-60%	£27.35	£29.26	7%	£25.50	£26.25	3%
Student	£38.10	£38.10	0%	£411.50	£411.50	0%	£15.00	£10.00	-33%	-	-	0%	-	-	0%
Student Spa	£53.55	£53.55	0%	£578.35	£578.35	0%	£15.00	£10.00	-33%	-	-	0%	-	-	0%
Junior	£16.35	£16.35	0%	£176.60	£176.60	0%	£15.00	£10.00	-33%	£22.00	£23.55	7%	£25.50	£26.25	3%
Junior Concession	£11.20	£11.20	0%	-	-	0%	£15.00	£10.00	-33%	£15.65	£16.25	4%	£25.50	£26.25	3%
BHF Off Peak	£47.00	£47.00	0%	£507.60	£507.60	0%	£15.00	£10.00	-33%	-	-	0%	-	-	0%
Corporate	£49.50	£51.00	3%	£534.60	£561.00	5%	£25.00	£10.00	-60%	-	-	0%	-	-	0%
NHS	£43.00	£43.00	0%	£506.00	£506.00	0%	£25.00	£10.00	-60%	-	-	0%	-	-	0%
Joint	£103.95	£103.95	0%	£1,122.65	£1,122.65	0%	£25.00	£10.00	-60%	-	-	0%	-	-	0%
Adult ICE	£29.20	£30.08	3%	-	-	0%	£25.00	£10.00	-60%	-	-	0%	-	-	0%
H&F ICE Junior	£21.75	£22.40	3%	-	-	0%	£15.00	£10.00	-33%	-	-	0%	-	-	0%
Swim UK	£35.00	£35.00	0%	£351.00	£351.00	0%	£10.00	£10.00	0%	-	-	0%	-	-	0%
Better Health Senior Archway	£34.00	£34.00	0%	£367.20	£367.20	0%	£10.00	£10.00	0%	-	-	0%	-	-	0%
Better Saver Archway	£35.00	£35.00	0%	£378.00	£378.00	0%	£10.00	£10.00	0%	-	-	0%	-	-	0%
Better Health Archway	£40.00	£40.00	0%	£432.00	£432.00	0%	£10.00	£10.00	0%	-	-	0%	-	-	0%
Better Health Senior Cally	£27.00	£27.00	0%	£293.40	£293.40	0%	£10.00	£10.00	0%	-	-	0%	-	-	0%
Better Saver Cally	£30.00	£30.00	0%	£323.10	£323.10	0%	£10.00	£10.00	0%	-	-	0%	-	-	0%
Better Health Cally	£32.00	£32.00	0%	£345.60	£345.60	0%	£10.00	£10.00	0%	-	-	0%	-	-	0%
Better Health Senior Highbury	£42.00	£42.00	0%	£459.00	£459.00	0%	£10.00	£10.00	0%	-	-	0%	-	-	0%
Better Saver Highbury	£35.00	£35.00	0%	£378.00	£378.00	0%	£10.00	£10.00	0%	-	-	0%	-	-	0%
Better Health Highbury	£50.00	£50.00	0%	£540.00	£540.00	0%	£10.00	£10.00	0%	-	-	0%	-	-	0%
Better Health Senior IRB	£30.00	£30.00	0%	£330.30	£330.30	0%	£10.00	£10.00	0%	-	-	0%	-	-	0%
Better Saver IRB	£35.00	£35.00	0%	£378.00	£378.00	0%	£10.00	£10.00	0%	-	-	0%	-	-	0%
Better Health IRB	£40.00	£40.00	0%	£432.00	£432.00	0%	£10.00	£10.00	0%	-	-	0%	-	-	0%
Better Health Senior ITC	£34.00	£34.00	0%	£367.20	£367.20	0%	£10.00	£10.00	0%	-	-	0%	-	-	0%
Better Saver ITC	£35.00	£35.00	0%	£378.00	£378.00	0%	£10.00	£10.00	0%	-	-	0%	-	-	0%
Better Health ITC	£40.00	£40.00	0%	£432.00	£432.00	0%	£10.00	£10.00	0%	-	-	0%	-	-	0%
Better Health Senior Sobell	£30.00	£30.00	0%	£330.30	£330.30	0%	£10.00	£10.00	0%	-	-	0%	-	-	0%
Better Saver Sobell	£30.00	£30.00	0%	£323.10	£323.10	0%	£10.00	£10.00	0%	-	-	0%	-	-	0%
Better Health Sobell	£36.00	£36.00	0%	£388.80	£388.80	0%	£10.00	£10.00	0%	-	-	0%	-	-	0%
INCLUSIVE	£22.00	£22.00	0%	-	-	0%	£10.00	£10.00	0%	-	-	0%	-	-	0%

### Appendix C4: Trampoline Pricing 2022/23

Trampoline Park Pricing	2021/22	2022/23	% Change
1 hr Peak Adult	£11.30	£11.65	3.10%
1hr Peak Junior	£9.00	£9.25	2.78%
1 hr Peak 1 Adult & 1 Under 5	£15.40	£15.85	2.92%
1 hr Off Peak Adult	£8.20	£8.45	3.05%
1hr Off Peak Junior	£8.20	£8.45	3.05%
1hr Off Peak 1 Adult & 1 Under 5	£12.25	£12.60	2.86%
1hr Off Peak Toddler Jump 1 Adult & 1 Toddler	£8.20	£8.45	3.05%
Disability Jump	£6.10	£6.10	0.00%
This Girl Can Jump	£3.20	£3.30	3.12%
1 hr Early Bird Jump	£6.10	£6.30	3.28%
Early Bird Jump 1 adult & 1 under 5	£10.30	£10.60	2.91%
1hr Family Adult jump	£8.20	£8.45	3.05%
1hr Junior Family Jump	£8.20	£8.45	3.05%
1hr 1 Adult & 1 under 5 Family Jump	£8.20	£8.45	3.05%
Birthday party (Price Per Person - Minimum 10)	£20.10	£20.70	2.99%

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## **Appendix D1: HRA Medium-Term Financial Strategy 2022/23 to 2024/25**

	<b>2021/22</b>	<b>2022/23</b>	<b>2023/24</b>	<b>2024/26</b>
	<b>Estimate</b>	<b>Estimate</b>	<b>Indicative Estimate</b>	<b>Indicative Estimate</b>
	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>
<b>HRA INCOME</b>				
Tenants Rents	160.500	168.400	174.900	180.100
Tenant Service Charges	18.300	19.300	19.700	20.100
<b>Sub-Total Dwellings Income</b>	<b>178.800</b>	<b>187.700</b>	<b>194.600</b>	<b>200.200</b>
Commercial Income	1.600	1.400	1.400	1.400
Heating Charges	2.100	3.000	3.000	3.000
Leaseholder Annual Service Charges	12.200	13.600	13.900	14.200
Leaseholder Major Works Charges	3.500	3.500	3.500	3.500
<b>Sub-Total Leaseholder Charges</b>	<b>15.700</b>	<b>17.100</b>	<b>17.400</b>	<b>17.700</b>
Other Charges/Income for Services	3.000	2.800	2.800	2.900
PFI Government Subsidy	22.900	6.100	6.100	6.100
Interest Receivable	1.000	1.000	1.000	1.000
Transfers from the General Fund for Shared Services	0.800	0.800	0.800	0.800
Contribution from Reserves	18.900	0.000	0.000	0.000
<b>Gross Income</b>	<b>244.800</b>	<b>219.900</b>	<b>227.100</b>	<b>233.100</b>
<b>HRA EXPENDITURE</b>				
General Management	53.700	61.300	62.600	63.200
Special Services	24.400	27.400	28.000	28.200
PFI Payments	44.900	13.100	13.400	13.900
Repairs & Maintenance	35.300	42.900	44.100	45.100
Rent, Rates & Other Charges	1.000	1.000	1.000	1.000
Interest Charges on Borrowing	16.400	19.500	20.700	21.300
Revenue Contributions to Capital	31.900	5.700	8.700	16.500
Depreciation - Contribution to the Major Repairs Reserve	31.500	32.100	32.800	33.400
<b>Sub-Total Capital Financing Costs</b>	<b>79.800</b>	<b>57.300</b>	<b>62.200</b>	<b>71.200</b>
Increase in Bad Debt Provision	2.200	2.200	2.200	2.200
Contingency	3.500	6.100	5.900	3.900
Contribution to Reserves	0.000	8.600	7.700	4.400
<b>Gross Expenditure</b>	<b>244.800</b>	<b>219.900</b>	<b>227.100</b>	<b>233.100</b>
<b>Net</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>

<b>HRA Reserves</b>				
Opening Balance		88.500	97.100	104.800
LESS: Contribution from Reserves		0.000	0.000	0.000
ADD: Contribution to Reserves		8.600	7.700	4.400
<b>Closing Balance</b>		<b>97.100</b>	<b>104.800</b>	<b>109.200</b>

## Appendix D2: HRA Fees and Charges 2022/23

### Tenant Service Charges and Digital TV Charges

	<b>Proposed weekly charge or compensation sum</b>
Caretaking and Cleaning	£10.41
Estate Services (estate lighting, communal estate repairs and grounds maintenance)	£6.16
<b>Tenant Service Charge</b>	<b>£16.57</b>
Digital TV (Installation & maintenance)	£0.36
Digital TV (maintenance only)	£0.21
Compensation for loss of caretaking service	£2.49 per day (after 5 consecutive days of lost service)
<p><b>Note:</b> The weekly tenant service charge for caretaking and estate services increases by 79p per week from £15.78 to £16.57.</p> <p>The overall Tenant Service Charge has increased by 79p per week (+5%) primarily because communal electricity prices are forecast to increase by 49% in 2022/23.</p> <p>Caretaking compensation remains in line with last year.</p> <p>Digital TV installation &amp; maintenance and maintenance only have increased by 1p per week respectively to reflect ongoing maintenance costs.</p>	

### Heating and Hot Water Charges

	<b>Bedsit Weekly Charge £</b>	<b>1-Bed Weekly Charge £</b>	<b>2-Bed Weekly Charge £</b>	<b>3-Bed Weekly Charge £</b>	<b>4-Bed Weekly Charge £</b>
General:					
Heating and Hot Water	9.63	10.66	12.65	14.88	16.85
Heating Only (60% of Full Charge)	5.78	6.40	7.59	8.93	10.11
Heating Only (60% of Full Charge + 15%) All Year heating (Braithwaite)	6.65	7.36	8.73	10.27	11.63
Bunhill Energy Network (St Luke's, Stafford Cripps, Redbrick & Kings SQ)	8.67	9.59	11.38	13.39	15.17
<p>Compensation (after 5 consecutive days or more of lost service, backdated to the start of the heating loss period):</p> <p>Heating and Hot Water £9.48 per day</p> <p>Heating only £8.84 per day</p> <p>Hot Water only £1.15 per day</p>					
<p><b>Note:</b> Gas prices are forecast to increase by around 55% in 2022/23. The Tenants' gas reserve has been used to absorb some of this cost pressure meaning that Tenants'</p>					

Heating and Hot Water increases in 2022/23 can be limited to around +25% and not the full +55%.

Heating Compensation increases are in line with this years' Heating + Hot Water charges increase.

### **Estate Parking Charges**

	<b>EMISSION BANDS / CHARGES</b>			
<b>CARBON EMISSION AND ENGINE SIZES:</b>	BAND A	BAND B	BAND C	BAND D
Carbon CO2 Rating G/km (Grams per kilometre)	0-120	121-150	151-185	186+
Engine Size CC (Cylinder Capacity)	Up to 1100	1101-1399	1400-1850	1851+
	<b>Weekly Charge £</b>	<b>Weekly Charge £</b>	<b>Weekly Charge £</b>	<b>Weekly Charge £</b>
<b>Rent &amp; Service Charge Payers:</b>				
- Garage	10.65	21.30	21.30	23.43
- Car Cage	4.98	9.96	9.96	10.95
- Parking Space	2.72	5.43	5.43	5.97
- Integral Garage	7.35	14.67	14.67	16.15
<b>Non-Rent &amp; Service Charge Payers:</b>				
- Garage	23.94	47.81	47.81	52.56
- Car Cage	11.22	22.35	22.35	24.59
- Parking Space	6.58	14.01	14.01	19.28
				<b>£</b>
<b>Garages Used For Non-Vehicle Storage – Rent &amp; Service Charge Payers</b>				23.43
<b>Garages Used For Non-Vehicle Storage – Non-Rent &amp; Non-Service Charge Payers</b>				48.74
Diesel Surcharge - applies to both Rent/Serv. Charge Payers & Non Rent/Serv. Charge Payers in respect of all parking facilities				129.00 per Year or 2.48 per Week
A 50% or 100% discount is offered on all vehicle parking charges to Islington Council residents that hold a disability parking blue badge issued by either Islington Council or another Local Authority.				
VAT will be added to the above charges where applicable.				

**Note:****Vehicle charges**

HRA Rent & Service Charge payers - charges increase in line with estimated inflation 2%.

NON HRA Rent and Service Charge payers – charges increase by 10% in line with street parking increases

For example, the charge to an LBI Tenant or Leaseholder for a garage with a band B vehicle increases by 42p from £20.88 to £21.30 per week.

With the exception of the diesel surcharge which has increased by £3 (2.4%) per year in order to align the surcharge with the on-street (outside council estates) surcharge.

Electric Car users: Rent & Service Charge payers will continue to have free access to all council estate parking facilities and Non-Rent & Service payers will continue to be charged at Band A rates.

**Concierge Service Charges**

	<b>Weekly Charge £</b>
Category A (Concierge Office in Block)	16.43
Category B (Concierge Office in Estate)	12.34
Category C (Concierge Office – Remote multiple cameras)	7.41
Category D (Concierge Office – Remote a small number of cameras)	2.33
<b>Note:</b> The weekly tenant charges have increased by 4.54% to more closely reflect the true cost of the service provided. For example the charge to tenants who receive a Category B service increases by 54p from £11.80 to £12.34 per week.	

**Parking Charge Notices (PCN)**

	<b>Council Estates £</b>
Parking Charge Notices	100.00
Parking Charge Notices (Paid within 14 days of issue)	60.00
<b>Note:</b> The maximum charges for unauthorised parking on council estates (off-street parking) are recommended by the British Parking Association on behalf of the Home Office. No increase is recommended in 2022/23.	
For Penalty Charge Notices issued on-street and on some council estates (where Traffic Management Orders have been introduced) the Council charges between £80 and £130 depending on the seriousness of the offence (with 50% discount if paid within 14 days)	

## **Storage Units**

	<b>Weekly Charge £</b>
Rent & Service Charge Payers	1.91
Non-Rent & Service Charge Payers	3.83
<b>Note:</b> Charges increase in line with estimated inflation of 2%. The charge to Rent & Service Charge Payers has increased by 4p from £1.87 to £1.91 and that for Non-Rent & Service Charge Payers has increased by 8p from £3.75 to £3.83	

## **Floor Coverings (including underlay, carpets & fitting):**

Covering the Bedroom(s), Front Room, Hallway & Staircase

2022/23 charges to tenants commencing the scheme wef 2017/18 reflects a more robust/substantial underlay Increased in line with estimated inflation of 2%		
No of Beds	2022/23 Charge	Weekly Charge to Tenants over 5 years
1	£758	£2.92
2	£1,109	£4.26
3	£1,459	£5.61
4	£1,750	£6.73

## **Home Ownership Unit Charges:**

Fees have increased in line with estimated inflation +2%

### **1. Lease Holder Fees in respect of Structural Alterations & Additions:**

		<b>Home Ownership Fees 2022/23</b>	<b>Technical Property Services Fees 2022/23</b>
a	Minor alterations (e.g.: flues, extractor fans)	£93 – letter of consent	None
b	Deed of variation for windows	£260	None
c	Minor structural alterations	£93	£209
d	Major structural alterations (e.g. roofs, conservatories)	£113	£209 – technical inspections £63 per hour if additional technical work required
e	Retrospective consent	a/b/c/d +£329	£419 – technical inspections £63 per hour if additional technical work required
f	Re-drawing lease plans	£55	£475
g	Purchase of land/space e.g. garden/loft/basement	£116	£628 and any additional inspections £63 per hour, £524 valuation fee

### **2. Lease Holder Miscellaneous Fees:**

		<b>Home Ownership Fees 2022/23</b>
a	Sub-let Registration	£45
b	Assignment pack	£203 L/Holder £88 F/Holder
c	Re-mortgage pack	£145 L/Holder £74 F/Holder
d	S146 costs	£292
e	Copy of lease	£29
f	Letter of Satisfaction	£58
g	Copy of service charge invoice	£29

## 2. Lease Holder Miscellaneous Fees continued:

		<b>Home Ownership Fees 2022/23</b>
h	Breakdown of charges for a previous year	£29
i	Notice of assignment or charge	£71
j	Combined notice of assignment and charge	£143
k	Removal of Land Registry charge	£120
l	Details of planned major works	£57
m	Postponement charge	£228
n	Major works extended payment plan – legal charge	£228
o	Removal of Land Registry charge for major works extended payment plan	£120
p	Letter before legal action	£43

## **Appendix D3 – Leaseholder Service Charges**

### **1. Synopsis**

- 1.1. This report proposes that the council replaces its current bedroom weightings method of apportionment for service charges with a points based system. This would enable us to apportion service charges in a manner that preserved the charge differentiation according to property sizes as well as facilitate 100% recovery of rechargeable costs.

### **2. Recommended Approach**

- 2.1. To replace the bedroom weightings method with the points system for the apportionment of home owners' annual and major works service charges.
- 2.2. To introduce the apportionment method for each service charge element listed in **Table 2**, including replacing some unit rate charges with the points system.
- 2.3. To implement the new approach from 1 April 2022.

### **3. Background**

- 3.1. Service charges are calculated at block or estate level, according to the service provided or work undertaken. There is no standard apportionment method to share the costs between individual properties but the most commonly used are: floor area, number of bedrooms, rateable value and a "unit rate" basis (i.e. cost divided by no of units).
- 3.2. The council used rateable values to apportion all service charges until 1992. By 2002 annual service charges were apportioned on a unit rate basis and a bedroom weighting was used for major works. By 2007, most service charges were apportioned by bedroom weighting and the remainder by unit rate. Current and proposed apportionment methods for each service charge element are set out in **Table 2**.
- 3.3. The current bedroom weighting method is summarised in **Table 1** below. Costs are divided by the total number of block/estate units (or in some cases the divisor used is the number of units attached to a communal system) to obtain a unit charge. A weighting percentage is then applied, depending on the number of bedrooms in a property to give the individual property recharge:

**Table 1 – Current Bedroom Weighting Method**

<b>Bedrooms</b>	<b>Standard bedroom weighting</b>	<b>Heating bedroom weighting</b>
Bedsit	20% reduction	20% reduction
1-bed	10% reduction	10% reduction
2-bed	Unit charge	Unit charge
3-bed	Unit charge	10% increase
4-bed	10% increase	20% increase
5-bed	20% increase	20% increase
6-bed	20% increase (30% for caretaking)	20% increase

- 3.4. The proposed system is one where each property is allocated four points (notionally to represent a living room, kitchen, hallway and bathroom) and one extra point for each bedroom. So bedsits would be allocated four points and a one-bedroomed flat would be allocated five points and so on. The amount each flat pays is the number of points as a proportion of the total points in the block/estate.
- 3.5. This approach is already in place for PFI1 and PFI2 leasehold stock and is a well-established system used by Southwark Council and other public sector landlords.

**Table 2 – Current and Proposed Apportionment Methods for each service charge element**

Service charge element	Actuals 20/21	Current apportionment method		Proposed method
	Average charge	LBI directly-managed properties	PFI1 & PFI2	
Block repairs & maintenance	£230	Bedroom weighting	Points	Points
Communal electricity	£50	Bedroom weighting	Points	Points
Entryphone repairs & maintenance	£21	Bedroom weighting	n/a	Points
Estate repairs & maintenance	£41	Bedroom weighting	n/a	Points
Fire safety	£33	Bedroom weighting	Points	Points
Grounds maintenance	£58	Bedroom weighting	Points	Points
Pest control	£3	Bedroom weighting	Points	Points
TMO / co-op charges	£564	Bedroom weighting	n/a	Points
Caretaking	£431	Bedroom weighting	n/a	Points
Heating (energy costs)	£322	Heating weighting	n/a	Points
Heating repairs & maintenance	£142	Heating weighting (annuals); bedroom weighting (major works)	n/a	Points
Concierge	£461	Unit	n/a	Points
Block mechanised services	£22	Unit	n/a	Points
Estate mechanised services	£49	Unit	n/a	Points
Digital aerial repairs & maintenance	£12	Unit	Points	Points
Building insurance	£268	Sum insured	Sum insured	No change
Management fee	£252	Unit (based on categories)	Unit	No change

**Appendix E1: Capital Programme 2022/23 - 2024/25  
and Indicative Programme 2025/26 - 2031/32**

TOTAL CAPITAL PROGRAMME			213.809	194.321	213.052	200.058	187.600	181.346	1,119.184	1,104.252
			2022/23 (Year 1)		2023/24 (Year 2)		2024/25 (Year 3)		2025/26 to 2031/32 (Years 4-10)	
Scheme Title	Area of Programme	Project Description	22/23 Expenditure £m	22/23 Net Budget £m	23/24 Expenditure £m	23/24 Net Budget £m	24/25 Expenditure £m	24/25 Net Budget £m	25/26-31/32 Expenditure £m	25/26-31/32 Net Budget £m
<b>A Safer Borough for All</b>										
Corporate CCTV Upgrade	Environment	Urgent upgrades to the Council's core CCTV network to increase resilience and minimise downtime. Also includes investment in a CCTV-enabled vehicle to increase coverage for hot-spots, aligned to growth for the Antisocial Behaviour team.	2.200	2.200	0.200	0.200	0.200	0.200	1.400	1.400
<b>Children and Young People</b>										
Adventure Playgrounds - Cornwallis Adventure Playground	CLS	Delivery of new main building. Planning permission secured and construction will commence in spring 2022	0.218	0.218	-	-	-	-	-	-
Adventure Playgrounds - Martin Luther King	CLS	Delivery of new main building. Planning permission secured and construction will commence in spring 2022	0.124	0.124	-	-	-	-	-	-
Early Years and Children's Centres	CLS	Package of urgent repairs and modernisation across the majority of the Council's early years facilities and children's centres.	0.185	0.185	-	-	-	-	-	-
Early Years Capital	CLS	Children centre remodelling and other works	0.332	0.332	-	-	-	-	-	-
Primary Schools Condition Schemes/Schools Modernisation SEN	CLS	Special provision Fund allocation to cover £2m project at Elthorne SEN and other smaller SEN projects	1.780	1.780	0.100	0.100	-	-	-	-
Rose Bowl	CLS	Facility built in 2001 and will need future capital redevelopment in next 10 years in order for the up keep of provision for youth activities.	-	-	-	-	0.954	0.954	0.954	0.954
Schools - Schools Condition Schemes	CLS	Government grant funding for condition maintenance covering the fabric of school buildings, roofs, brickwork, windows and internal works. Also includes grant funding to undertake investments in provision for pupils with special educational needs and disabilities, such as new places and improvements to facilities for pupils with education, health and care plans in mainstream and special schools, nurseries, colleges and other provision.	2.278	2.278	1.400	-	1.400	-	9.800	-
Schools - Tufnell Park School Expansion	CLS	New Build replacement and expansion of existing 1.5 form entry school to 3 form entry school.	0.688	0.688	-	-	-	-	-	-
Toffee Park & Radnor St Gardens	CLS	Substantial refurbishment of current facilities to create a 'start well' campus, as well as improving the MUGA and creating a new BMX/skateboarding facility in Radnor St Gardens. Includes a £1.5m Local CIL contribution.	1.828	1.828	1.219	1.219	-	-	-	-
Enhanced Special Needs Provision	CLS	Rolling high needs funding provision, will be combined with existing unspent funds to develop a refreshed capital strategy for the special needs estate. This forms part of 5 projects in delivery or now complete.	1.743	-	-	-	-	-	-	-
Packington Nursery Expansion	CLS	Works to enhance indoor and outdoor space, providing children with additional space for play and a new staff room with improved visibility and sight lines	0.180	0.180	-	-	-	-	-	-

**Appendix E1: Capital Programme 2022/23 - 2024/25  
and Indicative Programme 2025/26 - 2031/32**

TOTAL CAPITAL PROGRAMME			213.809	194.321	213.052	200.058	187.600	181.346	1,119.184	1,104.252
			2022/23 (Year 1)		2023/24 (Year 2)		2024/25 (Year 3)		2025/26 to 2031/32 (Years 4-10)	
Scheme Title	Area of Programme	Project Description	22/23 Expenditure £m	22/23 Net Budget £m	23/24 Expenditure £m	23/24 Net Budget £m	24/25 Expenditure £m	24/25 Net Budget £m	25/26-31/32 Expenditure £m	25/26-31/32 Net Budget £m
The Zone Youth Club - Refurbishment and Reconfiguration	CLS	The Zone Youth Club is a council owned space which is situated between two schools, Beacon High and the Bridge. Beacon High works with many young people who are vulnerable to poorer outcomes and historically has excluded higher numbers of pupils than other schools. The Bridge is a special school working with young people with SENDs, including autism and other learning disabilities.	0.128	0.051	-	-	-	-	-	-
Enhanced Children's Residential Provision	CLS	Local Authorities have been invited to bid for match funding to invest, develop or renovate property to create a new Children's home provision in their area. This creates opportunity for significant revenue savings and we are currently exploring possible plots for the actual building to be renovated.	0.526	0.263	-	-	-	-	-	-
Lift Building Development	CLS	Refurbishment of dance studio and roof space to support income generation targets in new contract.	0.550	0.550	-	-	-	-	-	-
Prior Weston Primary School Playground Redevelopment	CLS	S106 Funded scheme for the redevelopment of Prior Weston Primary School Playground. This scheme is managed by the school and will be overseen by our S106 Project Manager.	-	-	0.400	-	-	-	-	-
<b>Decent &amp; Affordable Homes</b>										
Finsbury Leisure Centre Redevelopment	CLS	The council is seeking to redevelop Finsbury leisure centre and surrounds as a mixed use development - delivering new affordable housing, a new leisure centre and medical centre, and other significant community benefits. This funding represents the general fund contribution to the scheme (predominantly funded from the housing capital programme), and supports design and construction phases. The scheme has dedicated governance and spending will be subject to multiple gateway reviews	0.858	0.858	1.172	1.172	4.393	4.393	16.491	16.491
HRA Current New Build Programme - General Fund Open Market Sales Units	Housing - GF	Our major programme of investment in new social housing. Provision of housing supports local plan objectives for delivery and provides a cross subsidy for affordable homes and public infrastructure.	16.139	16.139	15.559	15.559	0.573	0.573	-	-
HRA Pipeline New Build Programme - General Fund Open Market Sales units	Housing - GF	Our major programme of investment in new social housing. Provision of housing supports local plan objectives for delivery and provides a cross subsidy for affordable homes and public infrastructure.	7.584	7.584	18.548	18.548	35.316	35.316	251.812	251.812
Housing Revenue Account Major Works and Improvements	Housing - HRA	Ongoing programme of investment in council homes and estates, including cyclical improvements (e.g. kitchens & bathrooms, smoke and heat detection, windows), mechanical and electrical (e.g. lifts, door entry, water tanks, CCTV) and fire safety (e.g. fire risk assessment works, front entrance doors, fire-fighting facilities and fire safety measures in street properties and tall blocks).	45.500	42.857	50.000	50.000	50.000	50.000	358.500	358.500

**Appendix E1: Capital Programme 2022/23 - 2024/25  
and Indicative Programme 2025/26 - 2031/32**

<b>TOTAL CAPITAL PROGRAMME</b>			<b>213.809</b>	<b>194.321</b>	<b>213.052</b>	<b>200.058</b>	<b>187.600</b>	<b>181.346</b>	<b>1,119.184</b>	<b>1,104.252</b>
			<b>2022/23 (Year 1)</b>		<b>2023/24 (Year 2)</b>		<b>2024/25 (Year 3)</b>		<b>2025/26 to 2031/32 (Years 4-10)</b>	
<b>Scheme Title</b>	<b>Area of Programme</b>	<b>Project Description</b>	<b>22/23 Expenditure £m</b>	<b>22/23 Net Budget £m</b>	<b>23/24 Expenditure £m</b>	<b>23/24 Net Budget £m</b>	<b>24/25 Expenditure £m</b>	<b>24/25 Net Budget £m</b>	<b>25/26-31/32 Expenditure £m</b>	<b>25/26-31/32 Net Budget £m</b>
HRA Current New Build Programme - HRA Social Rented Units	Housing - HRA	Our major programme of investment in new social housing to provide high quality and genuinely affordable council rent housing supply to Islington residents.	54.984	54.984	56.202	56.202	7.686	7.686	-	-
HRA Pipeline New Build Programme - HRA Social Rented Units	Housing - HRA	Our major programme of investment in new social housing to provide high quality and genuinely affordable council rent housing supply to Islington residents.	11.884	11.884	27.823	27.823	52.974	52.974	377.720	372.588
Property Acquisitions	Housing - HRA	Property acquisitions to support provision of additional affordable housing	32.016	26.291	-	-	-	-	-	-
<b>Enhancing Community Assets</b>										
Libraries - Islington Museum and Local History Centre	CLS	Redesign and refurbishment of museum space (exhibition space and permanent gallery) and improved accessibility	0.200	0.200	-	-	-	-	-	-
Libraries - South Library	CLS	Accessibility improvements and roof repairs	0.200	0.200	-	-	-	-	-	-
Libraries - West Library	CLS	Bringing first floor back into use as a youth employment hub	0.100	0.016	-	-	-	-	-	-
Libraries Modernisation	CLS	Urgent modernisation to building fabric and fixtures & fittings across the Council's library estate in order to ensure they are fit for purpose and support community objectives.	0.150	0.150	-	-	-	-	-	-
Compliance and Modernisation	CLS	Funds to deal with urgent property compliance issues and to assist in providing funds for a cyclical maintenance and modernisation programme across the council's estate.	3.410	3.410	4.000	4.000	4.000	4.000	13.120	13.120
Whittington Park Hocking Hall Community Centre Phase 1	CLS	Refurbishment and structural repairs to Hocking Hall, Whittington Community Centre to ensure it is kept in a fit state and enable the expansion of the centre to ensure it better serves local community needs.	1.346	0.734	-	-	-	-	-	-
Mildmay Library	CLS	Refurbishment to make better use of the asset and to accommodate additional community services including a Fairer Together locality hub. Scope and funding still to be finalised.	0.450	0.450	0.200	0.200	-	-	-	-
Holly Hall	CLS	Creating a new black cultural and community centre for the borough	0.550	0.550						
Future Work Phase 2	CLS	Placeholder for capital elements, subject to further development and does not include likely investment requirements around ventilation, accessibility and common parts. All subject to business case approval.	1.631	1.631	-	-	-	-	-	-

**Appendix E1: Capital Programme 2022/23 - 2024/25  
and Indicative Programme 2025/26 - 2031/32**

TOTAL CAPITAL PROGRAMME			213.809	194.321	213.052	200.058	187.600	181.346	1,119.184	1,104.252
			2022/23 (Year 1)		2023/24 (Year 2)		2024/25 (Year 3)		2025/26 to 2031/32 (Years 4-10)	
Scheme Title	Area of Programme	Project Description	22/23 Expenditure £m	22/23 Net Budget £m	23/24 Expenditure £m	23/24 Net Budget £m	24/25 Expenditure £m	24/25 Net Budget £m	25/26-31/32 Expenditure £m	25/26-31/32 Net Budget £m
£10m Member Priority - Placeholder	CLS	One-off capital investment to support key community priorities across the borough. Officers will work with members to agree how the pot is used, which may include: - Tackling urgent maintenance and improvement backlogs; - Providing top-up funding to ensure that in-flight schemes are completed or accelerated; and - Delivering new schemes.	-	-	5.000	5.000	5.000	5.000	-	-
CWB Small S106/CIL Schemes	CLS	This programme consists of small capital projects funded by S106/CIL budgeted at less than £0.250m per project. These projects aim to make targeted investments across the borough with spending decisions led and managed by local ward councillor	0.066	0.000	1.032	0.077	-	-	-	-
Chapel Market	Environment	Chapel Market Inclusive Economy Project (CMIEP) is a masterplan for the enhancement of an existing affordable, diverse and inclusive market. This redevelopment of Chapel Market will offer a pioneering example of how the original features of a traditional retail market can be retained, whilst providing an offering which serves the local community, both through provision of goods and services and the potential for livelihoods and job creation fit for the future.	1.133	-	-	-	-	-	-	-
Council Building Renovation (Special Projects) Repairs and Renewal of Council Buildings	Environment	Completion of works including 222 Upper Street generator	0.025	0.025	-	-	-	-	-	-
Highways - Highways	Environment	Structural maintenance of the highways infrastructure including carriageways, footways, drainage, bridges, pipe subways. Capital investment helps to slow the rate of deterioration extend the life of Islington streets, improve streetscape, meet legal obligations, reduce cyclic repairs and maintenance costs and reduce insurance liability risk claims.	1.400	1.400	1.400	1.400	1.400	1.400	9.800	9.800
Leisure - Strategic Provision	Environment	Provisional sums held for strategic development of leisure facilities at Finsbury Leisure Centre and Cally Pool; dependent on decision relating to Council-led redevelopment which may mean capital investment is required. Capital funding also identified to mitigate against potential risk associated with leisure contract and protect revenue return.	-	-	1.025	1.025	2.025	2.025	5.000	5.000
Environment Small S106/CIL Schemes	Environment	This programme consists of small capital projects funded by S106/CIL budgeted at less than £0.250m per project. These projects aim to make targeted investments across the borough with spending decisions led and managed by local ward councillor	0.128	0.000	2.030	0.000	0.104	0.000	-	-

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			2022/23 (Year 1)		2023/24 (Year 2)		2024/25 (Year 3)		2025/26 to 2031/32 (Years 4-10)	
Scheme Title	Area of Programme	Project Description	22/23 Expenditure £m	22/23 Net Budget £m	23/24 Expenditure £m	23/24 Net Budget £m	24/25 Expenditure £m	24/25 Net Budget £m	25/26-31/32 Expenditure £m	25/26-31/32 Net Budget £m
External S106/CIL Schemes	Environment	This programme consists of small capital projects funded by S106/CIL budgeted at less than £0.250m per project. These projects aim to make targeted investments across the borough with spending decisions led and managed by local ward councillor	-	-	0.404	0.000	-	-	-	-
Vorley Road Library	CLS	To create a new state of the art library for Archway. It would offer a significant improvement from the current library, which has limited flexibility, is increasingly in need of repair, and is also located within a leased space. Co-locating with the proposed new medical centre and next door to archway children's centre and leisure centre, would create a new community hub for Archway residents.	0.200	0.200	0.750	0.750	2.000	2.000	1.287	1.287
<b>Greener &amp; Cleaner Islington</b>										
Energy - Retrofitting Schools	CLS	The council is carrying out decarbonisation feasibility studies on 20 schools, which will identify appropriate measures, including heating system replacements, insulation and other energy-saving works. These studies will enable future bids to the Public Sector Decarbonisation Scheme to deliver the decarbonisation proposals. If approved, the £4m in Council funding will help to implement these measures and could be used as match funding to leverage additional investment	-	-	2.000	2.000	2.000	2.000	-	-
Energy - Retrofitting Existing Council Buildings	Environment	Retrofitting existing council buildings to reduce carbon emissions and improving energy efficiency. This will include replacing gas heating systems with heat pumps, installing solar PV and other energy efficiency measures (insulation, glazing, LED lighting etc). Feasibility studies are to be carried out on around 50-60 corporate buildings to identify the works required, costs and any savings, with capital works starting in 22/23. This will help the council achieve its zero carbon ambition and possibly lead to reduced operating costs.	0.500	0.500	1.000	1.000	2.000	2.000	-	-
Greening the Borough	Environment	This project is to develop and deliver a community led and maintained, long-term, large scale, borough wide, innovative programme, for the greening (and blueing) of the wider public realm across highways, cycleways, housing and parkland assets. This would enable approximately 70 interventions to be delivered in a fair, transparent and accessible way, in line with Islington, regional and national policy documents and the emerging Green Infrastructure Strategy.	0.500	0.500	0.500	0.500	0.500	0.500	-	-
GreenSCIES	Environment	To develop a new heat network integrating Solar PV and Electric Vehicle charging points. This project aims to reduce CO2 by 5,000 tonnes benefitting 820 council homes.	-	-	5.500	1.500	5.500	1.250	5.500	5.500

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Street Lighting - LED upgrades	Environment	Scheme to upgrade street lighting to LEDs across 34 streets that were not covered in the prior upgrade project. This project will deliver energy savings for authority.	0.060	0.060	0.198	0.198	-	-	-	-
Clerkenwell Green	Environment	Pedestrian, cycle and public realm improvements - scheme will remove most through traffic and parking to transform the Green into a more welcoming public space. In addition, there will be investment in new community facilities to help further integrate local communities and celebrate the area's heritage.	1.717	0.127	-	-	-	-	-	-
Energy - LED Lighting Upgrades	Environment	Replace traditional lighting fittings with LED lights whenever possible in both corporate buildings and housing. Part of the Net Zero 'Vision 2030' strategy.	0.333	0.333	0.333	0.333	0.334	0.334	-	-
Energy - Solar Panels on Corporate Buildings	Environment	Install solar panels wherever financially and technically feasible on our corporate estate. This is a commitment within the Net Zero 'Vision 2030' strategy. Savings from generating our own electricity also support effective budget management.	0.333	0.333	0.333	0.333	0.334	0.334	-	-
Energy Services	Environment	This programme is related to improving the energy efficiency in the least efficient houses in the borough in both Islington Council and non-Islington Properties (Owner Occupied, Private Rental and Housing Association properties) - funded from the Green Homes Grant. Works must also be carried out in properties with a household income of under £30,000 pa.	0.251	0.251	-	-	-	-	-	-
Extension of energy network to Highbury West incl Harvist Estate	Environment	Installation of ground source heat pump system at the Harvist Estate to replace current electric storage heaters to address fuel poverty and cut carbon emissions.	-	-	0.869	-	-	-	-	-
Greenspaces - 3G Football Pitch Replacement	Environment	Relaying of carpets on 3G pitches - carpets need relaying every 7 to 10 years (depending on wear). This contributes to improving physical and health opportunities for the community and protects income from use of these pitches.	-	-	-	-	-	-	0.781	0.781
Greenspaces - Barnard Park Renewal	Environment	Full renovation of Barnard Park including 3G all-weather sports pitch, low carbon community hub building heated by ground source heat pump, green oval area for general leisure and informal sports, outdoor gym equipment, increased biodiversity, increased seating, new footpath routes and improved entrances.	1.441	-	0.432	0.000	-	-	-	-
Greenspaces - Bingfield Park (including Crumbles Castle legacy)	Environment	Enhancements to Bingfield Park including improved, more welcoming entrances and planting, enhanced sports facilities and new play equipment.	0.408	0.050	0.200	0.200	-	-	-	-

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Greenspaces - Park Improvements	Environment	Park improvements including Highbury Fields Sports Pitch. As well generating income the pitches play a key role in maintaining and improving the physical and mental health of the community by providing quality year round facilities for physical activity.	0.192	0.192	-	-	-	-	-	-
Greenspaces - Highbury Bandstand/Highbury Fields	Environment	Completion of works to café and toilets and funding for Christ Church to accommodate a stay & play service. This will protect under 5 stay and play provision, improves the provision of toilets and aims to make the building as energy efficient as possible to support the Council's zero carbon 2030 target.	0.455	0.142	0.150	0.150	-	-	-	-
Greenspaces - New River Walk	Environment	Repairs to the lining of the watercourse, bridge and other associated features, improving bio-diversity and safety and reducing water loss in support of Islington's Biodiversity Action Plan.	0.371	0.371	-	-	-	-	-	-
Greenspaces - Woodfall Park Improvements	Environment	Playground improvements to improve the pitch, replace playground surfacing and play equipment, replace site furniture, soft landscaping and tree works and installation of electricity and water point for events.	0.433	0.011	-	-	-	-	-	-
Islington Heat Networks	Environment	Expand existing heat networks and develop new ones following the decentralised energy masterplan. Part of the Council's Net Zero 'Vision 2030' strategy.	-	-	-	-	-	-	19.241	19.241
Leisure - Cally Pool	Environment	Urgent repairs to the roof of Cally Pool.	0.250	0.250	-	-	-	-	-	-
Leisure - Floodlight Upgrades	Environment	Floodlight upgrades for various Greenspace locations through converting all parks' pitch lighting to LED to reduce running costs and carbon emissions. Replacement required to ensure that lights do not ultimately fail, and prevent lost income associated with this risk.	-	-	-	-	-	-	0.095	0.095
Leisure - Leisure repairs/modernisation	Environment	Capital investment relating to the leisure contract, delivering £12.016m of investment in the leisure estate over 15 years (2014/15 to 2028/29), essential to improving physical and health opportunities for the community.	0.190	0.190	-	-	-	-	-	-
Leisure - Tufnell Park all-weather pitch	Environment	Conversion of the current grass football pitch to a grass hybrid pitch which will allow for more year round play and greater flexibility around the use of the space for a range of sporting activities.	0.385	0.385	-	-	-	-	-	-
People Friendly Streets - Liveable Neighbourhoods	Environment	Following the delivery of Low Traffic Neighbourhoods across the borough Islington will have the opportunity to deliver wide-sweeping environmental improvements on local streets including planting, footway improvements and pocket parks to all 20 Low Traffic Neighbourhoods transforming them into 'Liveable Neighbourhoods', following extensive consultation and engagement with local communities.	1.500	0.550	1.500	1.500	2.000	2.000	12.250	12.250

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People Friendly Streets - Low Traffic Neighbourhoods	Environment	Borough wide programme to reduce car trips and improve neighbourhoods for walking, cycling and living. As part of the Council's post Covid transport response the programme has been accelerated with 8 Low Traffic Neighbourhoods to be delivered by the end of 2020/21. Further investment will continue delivery of our Low Traffic Neighbourhood across all of Islington under the banner of 'People friendly streets.'	1.153	1.153	1.443	1.443	-	-	-	-
Public Realm - Fortune Street Area	Environment	The scheme will involve the development of a Fortune Street masterplan incorporating the enhancement of Fortune Street to make the street more pedestrian friendly, greener and to integrate the park with the wider neighbourhood. This will improve physical and health opportunities and access to nature.	0.592	0.000	-	-	-	-	-	-
Public Realm - Kings Square Shopping Area Public Space	Environment	Community driven public realm improvement project as part of public realm improvement plan. Will improve the space outside the shops to encourage community use of the space (e.g. to socialise). Opportunity for public realm feature (e.g. play equipment, public art or other) to act as a focal point.	0.597	0.000	-	-	-	-	-	-
Public Realm - Old Street/Clerkenwell Road	Environment	Public realm improvements to reduce through traffic, making route safer for pedestrians and cyclists, improving air quality and making area greener, healthier and a more attractive place.	-	-	1.000	0.750	-	-	-	-
Public Realm - St Johns Street Public Realm Improvements	Environment	Public realm improvements and pedestrian and cycling safety measures - proposal includes reallocation of road space to pedestrians and traffic management changes to reduce non-local traffic. Project linked to Farringdon Station which will have 140,000 passengers a day when Crossrail opens.	0.250	-	1.754	0.000	-	-	-	-
Recycling Site Improvement	Environment	Delivering improvements to recycling and waste facilities for purpose built blocks of flats, to drive down contamination, increase recycling and improve the environment and standard of living on estates.	0.150	0.150	0.100	0.100	0.100	0.100	0.700	0.700
School Streets	Environment	Temporary street closures to become a pedestrian and cycle zone during the school's opening and closing times to reduce congestion and pollution at the school gates as well as make it easier and safer for children to get to and from school. Improvements for schools on the main roads will include measures to improve air quality, increase road safety and encourage active travel. Measures will include widening footways, tree planting and green screens and secure cycle and scooter parking.	0.400	0.400	0.400	0.400	0.400	0.400	2.800	2.800

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Traffic & Parking - T&E Cycle Schemes	Environment	Borough-wide cycle parking and cycle hangars to provide secure cycle storage (especially for residents without domestic or garden space) to overcome a major barrier for new and continuing cyclists. Significant additional investment in the bike hangar programme to reduce the waiting list, and contribute to our Net Zero 'Vision 2030' strategy and improve Air Quality.	0.450	0.450	0.450	0.450	0.450	0.450	3.150	3.150
Traffic & Parking - T&E EV Charging Points	Environment	Borough-wide electric vehicle charging points. On-street charging points are essential to facilitate the switch to electric vehicles for the majority of motorists who park on-street. Islington Council is committed to encourage the switch to low emission vehicles to reduce emissions and increase air quality.	0.160	0.160	0.160	0.160	0.160	0.160	1.120	1.120
Traffic & Parking - T&E Safety Schemes	Environment	Borough-wide safety and corridor schemes - support of People Friendly Streets programme by delivering walking and cycling improvements on main roads. Will deliver improved and new crossings to create safe walking and cycling links, provide additional pedestrian facilities at local amenities and town centres, and deliver improvement to main roads such as improving bus priority. Will also look at maximising junction capacities to ensure that main roads do not become heavily congested and address emerging collision hotspots in line with collision data and collision studies.	0.500	0.500	0.500	0.500	0.500	0.500	3.500	3.500
Traffic & Parking - T&E Traffic Enforcement/Parking	Environment	Borough-wide traffic enforcement and parking schemes, including dedicated disabled bay scheme and other accessibility improvements across the borough. Addressing emerging issues through traffic restrictions is an essential part of managing traffic in the borough and protecting the local environment and communities from excessive traffic, air pollution and road safety risks.	0.300	0.300	0.300	0.300	0.300	0.300	2.100	2.100
Tree Planting Programme	Environment	Borough wide tree planting programme linked to outcome of tree canopy cover assessment and subsequent tree planting strategy. This will increase the canopy cover, amenity and climate change resilience of the borough.	0.210	0.210	0.210	0.210	0.160	0.160	1.120	1.120
Vehicle fleet electrification (infrastructure)	Environment	Development of a new substation/high voltage connection into the National Grid, low voltage network across the site and a contribution towards charging infrastructure. Supports the 'greening' of the Council's fleet and upgrades electrical infrastructure to ensure HGV element of the fleet can be switched to EV. This supports the Council's Net Zero Carbon Vision.	2.375	2.375	0.406	0.406	0.368	0.368	1.953	1.953

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Vehicle Replacement	Environment	Replacement of ageing fleet to decrease the use of hire vehicles and ensure that the Council is operating newer vehicles which are Euro 6/ULEZ compliant and replacement of petrol/diesel vehicles with electric vehicles on an ongoing ten year programme.	4.000	4.000	4.000	4.000	3.969	3.969	18.990	18.990
Wray Crescent Cricket Pavilion	Environment	Completion of works at the building, which will also have a green roof and ground source heat pump which supports the Net Zero Carbon 2030 Strategy, as well as supporting physical and community activity in the borough.	0.139	0.139	-	-	-	-	-	-
Isledon Road Gardens	Environment	S106 funded scheme to deliver improvements to Isledon Road Gardens. This project will rectify the current sunken garden area and design it as a sustainable drainage space with a focus on biodiversity enhancement. Other enhancements will include new play equipment and improvements to planting and garden design.	-	-	0.350	0.350	-	-	-	-
Retrofitting Existing Council Housing Stock	Housing - HRA	Additional retrofitting pilot projects to support funding agreed in 21/22 (Harry Weston/Longley House £3.5m). It is proposed that a rolling programme of £0.5m per annum is funded from the council's carbon offset fund which is allowable under the conditions of the fund and is considered by the Viability & Obligations Team to be affordable. Subject to sufficient funding available.	0.500	-	0.500	-	0.500	-	-	-

## **Appendix E2: Capital Strategy Report 2022/23**

### **Introduction**

This capital strategy report gives a high-level overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of local public services along with an overview of how associated risk is managed and the implications for future financial sustainability. It has been written in an accessible style to enhance members' understanding of these sometimes technical areas.

Decisions made this year on capital and treasury management will have financial consequences for the Authority for many years into the future. They are therefore subject to both a national regulatory framework and to local policy framework, summarised in this report.

### **Capital Expenditure and Financing**

Capital expenditure is where the Authority spends money on assets, such as property or vehicles that will be used for more than one year. In local government this includes spending on assets owned by other bodies, and loans and grants to other bodies enabling them to buy assets. The Authority has some limited discretion on what counts as capital expenditure, for example assets costing below £10,000 are not capitalised and are charged to revenue in year.

The council committed to a new Corporate Asset Strategy in March 2020. The strategy aims to establish a bold new approach that ensures investment is directly linked to core council ambitions around fairness and community wealth building. It is designed to deliver a strategic, long-term approach to managing and enhancing our community asset base.

In 2022/23, the Authority is planning capital expenditure of £215m (including expected reprofiling as at month 8 in 2021/22) as summarised below:

**Table 1: Prudential Indicator: Estimates of Capital Expenditure in £ millions**

	<b>2020/21 actual</b>	<b>2021/22 forecast</b>	<b>2022/23 budget</b>	<b>2023/24 budget</b>	<b>2024/25 budget</b>
General Fund services	27.134	43.851	67.434	78.527	76.610
Council housing (HRA)	84.503	115.422	146.375	134.525	111.160
<b>TOTAL</b>	<b>111.637</b>	<b>159.273</b>	<b>213.809</b>	<b>213.052</b>	<b>187.770</b>

The capital programme will deliver £614m of capital investment over the next three years to support the achievement of council objectives. Key projects contributing to these objectives are summarised below along with spend over the next three years.

### **Decent and Genuinely Affordable Homes for All:**

- Housing New Build Programme – the continuation of our major programme of investment in new social housing in Islington.
- Housing major works and improvements programme – ongoing investment in council homes and estates, including cyclical improvements, mechanical and electrical works, fire safety and energy efficiency improvements.
- New investment to support the redevelopment of Finsbury Leisure Centre, including over 100 new genuinely affordable homes.

### **Children and Young People:**

- Improving our early years, schools, youth and play provision.

### **A Safer Borough for All:**

- Upgrade to the council's core CCTV network and investment in CCTV-enabled vehicles to increase coverage for hot spots.

### **A Greener and Cleaner Islington:**

- Continuing investment to support the council's Net Zero Carbon strategy.
- Vehicle electrification charging infrastructure and replacement of vehicles.
- People Friendly Streets and School Streets – borough-wide programmes to reduce car trips and improve neighbourhoods for walking, cycling and living.
- Investment in the borough's parks, open spaces and leisure facilities.

In addition to these programmes, the capital programme will support the effective management of Islington's infrastructure and estate. This includes:

- Structural maintenance of the highways infrastructure including carriageways, footways and drainage.
- Compliance and modernisation improvements to deal with urgent property compliance issues.
- Use of Community Infrastructure Levy and S106 payments to make targeted investment across the borough spending decisions led and managed by local ward councillors.

The capital programme also includes a new £10m investment pot to support key community priorities across the borough. Officers will work with members to agree how the pot is used, which may include:

- Tackling urgent maintenance and improvement backlogs.
- Providing top-up funding to ensure that in-flight schemes are completed or accelerated.
- Delivering new schemes.

Further work will be required to allocate this additional capital investment pot and plan delivery timescales. Once this work has been completed, the proposed revised capital programme will be set out in a report to Full Council during 2022/23. In the meantime, the £10m additional capital budget is currently profiled equally between 2023/24 and 2024/25.

Full details of the authority's capital programme are found at **Appendix E1**.

**Governance:** Oversight and governance of the capital programme is supported by a comprehensive framework of advisory boards with member and officer involvement:

- The Corporate Asset Delivery Board, comprised of officers and members, is accountable for the overall delivery of the corporate asset strategy, with oversight of all material asset and capital related decisions. It reviews the 10-year capital strategy and supporting annual programmes, subject to formal budget approval.
- The Major Projects Board, comprised of officers, is accountable for initiating and monitoring delivery of significant mixed-use developments including those led by development partners, as well as smaller but complex schemes cutting across different directorates and/or with complex stakeholder management issues.
- The Housing Delivery Board, comprised of officers and members, integrates governance of new homes delivery and major works across the council's existing stock.
- The Borough Investment Panel, comprised of officers and members, is accountable for recommending approval of all CIL/s106 investment decisions and spend oversight.
- A series of Directorate level programme delivery boards, comprised of officers, are accountable for all other asset development and capital programme activity and linked to wider Directorate governance arrangements.

In relation to the annual capital programme, service managers submit capital submission bid requests annually to include projects in the authority's capital programme. Bids are collated by corporate finance who calculate the financing cost (which can be nil if the project is fully externally financed) and assess the overall affordability of the capital programme. This includes an assessment of the revenue implications of the projects as part of the revenue budget setting process.

A rigorous assurance and prioritisation exercise is then undertaken, assessing capital projects against their contribution to council priorities and their deliverability. The prioritisation process supports the council in making decisions about which project to progress, especially in an environment of challenging financial resources. All bids are appraised at Corporate Management Board who then make recommendations to members. The final capital programme is then presented to the Executive in January and to council in February/March each year.

- For full details of the Authority's capital programme, including the project appraisals undertaken, see **Appendix E1**.

All capital expenditure must be financed, either from external sources (government grants and other contributions), the Authority's own resources (revenue, reserves and capital receipts) or debt (borrowing, leasing and Private Finance Initiative).

The main sources of capital funding the council uses are summarised below:

- Capital Grants: predominantly government grants and are usually provided to the council for the specific use of funding capital expenditure for certain

schemes and programmes (e.g. Department for Education funding for schools' condition works).

- Section 106/CIL: developer contributions towards infrastructure; Section 106 contributions relate to specific projects and outcomes.
- Capital receipts: when a capital asset is no longer needed, it may be sold so that the proceeds, known as capital receipts, can be spent on new assets or to repay debt. The council primarily generates capital receipts from the open market sale homes used to finance the building of the council homes.
- Other capital contributions: specific contributions received for projects from third parties who may have a specific output or benefit achieved through the capital works the council is providing (e.g. landlord/tenant contributions to modernisation works).
- Revenue contributions: direct revenue contributions towards capital expenditure, a minimal source of funding due to pressures on the revenue budget.
- HRA Reserves: direct funding from the HRA to support its capital programme through the use of the Major Repairs Reserve and revenue contribution to capital works.
- Borrowing: typically, Public Works Loan Board (PWLB) loans to support capital expenditure. This form of capital funding has revenue implications (i.e. interest and provision to pay back loan) which are accounted for as part of the budget setting process.

The planned financing of the above expenditure is as follows:

**Table 2: Capital financing in £ millions**

	<b>2020/21 Actual £m</b>	<b>2021/22 Forecast £m</b>	<b>2022/23 Budgeted £m</b>	<b>2023/24 Budgeted £m</b>	<b>2024/25 Budgeted £m</b>
<b>General Fund</b>					
Capital Grant	10.404	2.741	3.701	5.400	5.650
S106/CIL	0.849	1.880	6.919	7.094	0.104
Capital Receipts	4.923	12.328	16.139	15.558	0.573
General Fund Borrowing	10.958	26.902	40.675	50.475	70.283
<b>Total General Fund</b>	<b>27.134</b>	<b>43.851</b>	<b>67.434</b>	<b>78.527</b>	<b>76.610</b>
<b>HRA</b>					
Capital Grant	0.702	6.575	5.725	0.000	0.000
S106/CIL	6.547	0.826	3.143	0.500	0.500
Capital Receipts	22.718	19.705	39.681	61.003	42.323
Revenue Contributions	8.424	23.739	5.694	8.669	16.506
HRA Reserves	46.112	30.674	32.357	33.159	28.232
HRA Borrowing	0.000	33.902	59.776	31.194	23.599
<b>Total HRA</b>	<b>84.503</b>	<b>115.421</b>	<b>146.376</b>	<b>134.525</b>	<b>111.160</b>
<b>Total Capital Programme</b>	<b>111.637</b>	<b>159.272</b>	<b>213.810</b>	<b>213.052</b>	<b>187.770</b>

The largest risk in relation to capital financing relates to capital receipts, of which the council expects to generate £55m in 2022/23. All these projected capital receipts are from the open market sales of housing and are intrinsically linked with the housing new build capital programme. Given present economic conditions there is uncertainty around the timing and value of these receipts. To mitigate these risks the council maintains a regular review of the property market and has been prudent in its financial assumptions. Timing delays can largely be managed using HRA reserves. In the event of a decrease in projected capital receipts, the new build programme would need to be re-assessed in line with the overall available funding.

Debt is only a temporary source of finance, since loans and leases must be repaid, and this is therefore replaced over time by other financing, usually from revenue which is known as minimum revenue provision (MRP). Alternatively, proceeds from selling capital assets (known as capital receipts) may be used to replace debt finance. Planned MRP and use of capital receipts are as follows:

**Table 3: Replacement of prior years' debt finance in £ millions**

	<b>2020/21 actual</b>	<b>2021/22 forecast</b>	<b>2022/23 budget</b>	<b>2023/24 budget</b>	<b>2024/25 budget</b>
MRP	2.463	3.222	4.437	6.199	8.363
Use of Capital Receipts	0.000	10.939	0.000	0.000	0.000
Repayment of PFI/Leases	14.304	13.312	4.597	4.454	4.872
<b>TOTAL</b>	<b>16.767</b>	<b>27.473</b>	<b>9.034</b>	<b>10.653</b>	<b>13.235</b>

- The Authority's full minimum revenue provision statement is at **Appendix E4**.

Each year the council is required to agree a MRP policy for the 'prudent' annual repayment of debt associated with the financing of capital expenditure. The guiding principle of the regulations and statutory guidance is that MRP is charged over a period that is reasonably commensurate with the period over which the capital expenditure which gave rise to the debt provides benefits.

Since 2017/18, the council has adopted the asset life (annuity) method (based on a prudent assessment of average asset life). In calculating the asset life (annuity) MRP, the average interest rates published by the Public Works Loans Board in the relevant financial year for new annuity loans will be used. Based on this policy, the estimated MRP in 2021/22 is £3.222m.

The Authority's cumulative outstanding amount of debt finance is measured by the capital financing requirement (CFR). This increases with new debt-financed capital expenditure and reduces with MRP, and capital receipts used to replace debt. The CFR is expected to increase by £91.217m during 2022/23. Based on the above figures for expenditure and financing, the Authority's estimated CFR is as follows:

**Table 4: Prudential Indicator: Estimates of Capital Financing Requirement in £ millions**

	<b>31/3/2021 actual</b>	<b>31/3/2022 forecast</b>	<b>31/3/2023 budget</b>	<b>31/3/2024 budget</b>	<b>31/3/2025 budget</b>
General Fund services	141.096	153.837	190.075	234.351	296.271
Council housing (HRA)	466.254	500.156	559.932	591.126	614.725
PFI Liabilities	96.370	83.058	78.461	74.007	69.136
<b>TOTAL CFR</b>	<b>703.720</b>	<b>737.051</b>	<b>828.468</b>	<b>899.484</b>	<b>980.131</b>

**Asset management:** To ensure that capital assets continue to be of long-term use, the Authority plans to update the asset management strategy in Autumn 2022 following the results of stock condition surveys which are currently underway.

**Asset disposals:** When a capital asset is no longer needed, it may be sold so that the proceeds, known as capital receipts, can be spent on new assets or to repay debt. Repayments of capital grants, loans and investments also generate capital receipts. The Authority plans to receive £52.549m of capital receipts in the coming financial year as follows:

**Table 5: Capital receipts receivable in £ millions**

	<b>2020/21 actual</b>	<b>2021/22 forecast</b>	<b>2022/23 budget</b>	<b>2023/24 budget</b>	<b>2024/25 budget</b>
Right To Buy (Gross)	9.473	11.968	12.265	12.570	12.882
Open Market Sales	0.618	23.268	27.784	28.471	17.843
Non-Right to Buy Sales	1.109	3.198	12.500	17.500	0.000
<b>TOTAL</b>	<b>11.200</b>	<b>38.434</b>	<b>52.549</b>	<b>58.541</b>	<b>30.724</b>

- The Authority's Flexible Use of Capital Receipts Policy (approved by Full Council in September 2021) is available here: [Flexible Use of Capital Receipts Policy](#)

### **Treasury Management**

Treasury management is concerned with keeping sufficient but not excessive cash available to meet the Authority's spending needs, while managing the risks involved. Surplus cash is invested until required, while a shortage of cash will be met by borrowing, to avoid excessive credit balances or overdrafts in the bank current account. The Authority is typically cash rich in the short-term as revenue income is received before it is spent, but cash poor in the long-term as capital expenditure is incurred before being financed. The revenue cash surpluses are offset against capital cash shortfalls to reduce overall borrowing.

Due to decisions taken in the past, the Authority currently has as at 31st January 2021, £278.275m borrowing at an average interest rate of 4.01% and £150.5m treasury investments at an average rate of 0.18%.

**Borrowing strategy:** The Authority's main objectives when borrowing are to achieve a low but certain cost of finance while retaining flexibility should plans change in future. These objectives are often conflicting, and the Authority therefore seeks to strike a balance between cheap short-term loans (currently available at around 0.10%) and long-term fixed rate loans where the future cost is known but higher (currently 1.5 to 2.5%).

Projected levels of the Authority's total outstanding debt (which comprises borrowing, PFI liabilities, leases and transferred debt) are shown below, compared with the capital financing requirement (see above).

**Table 6: Prudential Indicator: Gross Debt and the Capital Financing Requirement in £ millions**

	<b>31/3/2021 actual</b>	<b>31/3/2022 forecast</b>	<b>31/3/2023 budget</b>	<b>31/3/2024 budget</b>	<b>31/3/2025 budget</b>
Debt (incl. PFI & leases)	467.979	356.333	442.187	519.402	608.413
Capital Financing Requirement	703.720	737.051	828.468	899.484	980.131

Statutory guidance is that debt should remain below the capital financing requirement, except in the short-term. As can be seen from **Table 6**, the Authority expects to comply with this over the medium term.

**Liability benchmark:** To compare the Authority's actual borrowing against an alternative strategy, a liability benchmark has been calculated showing the lowest risk level of borrowing. This assumes that cash and investment balances are kept to a minimum level of £10m at each year-end. This benchmark was £229.909m as at 31<sup>st</sup> Match 2021 and is forecast to rise to £430.657m over the next three years.

**Table 7: Borrowing and the Liability Benchmark in £ millions**

	<b>31/3/2021 actual</b>	<b>31/3/2022 forecast</b>	<b>31/3/2023 budget</b>	<b>31/3/2024 budget</b>	<b>31/3/2025 budget</b>
Outstanding borrowing	371.609	273.275	363.726	445.395	539.277
Liability benchmark	229.909	167.775	275.452	351.698	442.086

The table shows that the Authority expects to remain borrowed above its liability benchmark.

**Affordable borrowing limit:** The Authority is legally obliged to set an affordable borrowing limit (also termed the authorised limit for external debt) each year. In line

with statutory guidance, a lower “operational boundary” is also set as a warning level should debt approach the limit.

**Table 8: Prudential Indicators: Authorised limit and operational boundary for external debt in £m**

	<b>2021/22 limit</b>	<b>2022/23 limit</b>	<b>2023/24 limit</b>	<b>2024/25 limit</b>
Authorised limit – borrowing	323.275	463.526	494.445	586.157
Authorised limit – PFI and leases	93.058	88.461	84.007	79.136
Authorised limit – total external debt	416.333	551.987	578.452	665.293
Operational boundary – borrowing	298.275	413.526	469.445	561.157
Operational boundary – PFI and leases	88.058	83.461	79.007	74.136
Operational boundary – total external debt	386.333	496.987	548.452	635.293

- Further details on borrowing are available in the treasury management strategy (**Appendix E5**).

**Treasury investment strategy:** Treasury investments arise from receiving cash before it is paid out again. Investments made for service reasons or for pure financial gain are not generally considered to be part of treasury management.

The Authority’s policy on treasury investments is to prioritise security and liquidity over yield, that is to focus on minimising risk rather than maximising returns. Cash that is likely to be spent in the near term is invested securely, for example with the government, other local authorities or selected high-quality banks, to minimise the risk of loss. Money that will be held for longer terms is invested more widely, including in bonds, shares and property, to balance the risk of loss against the risk of receiving returns below inflation. Both near-term and longer-term investments may be held in pooled funds, where an external fund manager makes decisions on which particular investments to buy, and the Authority may request its money back at short notice.

**Table 9: Treasury management investments in £millions**

	<b>31/3/2021 actual</b>	<b>31/3/2022 forecast</b>	<b>31/3/2023 budget</b>	<b>31/3/2024 budget</b>	<b>31/3/2025 budget</b>
Near-term investments	151.700	105.500	95.500	95.500	95.500
Longer-term investments	0.000	10.000	10.000	10.000	10.000
<b>TOTAL</b>	<b>151.700</b>	<b>115.500</b>	<b>105.500</b>	<b>105.500</b>	<b>105.500</b>

- Further details on treasury investments are available in the treasury management strategy (**Appendix E5**).

**Risk management:** The effective management and control of risk are prime objectives of the Authority’s treasury management activities. The treasury management strategy therefore sets out various indicators and limits to constrain the

risk of unexpected losses and details the extent to which financial derivatives may be used to manage treasury risks.

**Governance:** Decisions on treasury management investment and borrowing are made daily and are therefore delegated to the Director of Resources and staff, who must act in line with the treasury management strategy approved by council. The audit committee is responsible for scrutinising treasury management decisions.

### **Investments for Service Purposes**

The authority makes investments to assist local public services, including making loans to and buying shares in local service providers, local small businesses to promote economic growth, the authority's subsidiaries that provide services. In light of the public service objective, the authority is willing to take more risk than with treasury investments, however it still plans for such investments to break even after all costs.

Total investments for service purposes are currently valued at £2m with the largest being soft loans to employees of £0.952m providing a net return after all costs of 0%. This also includes loans to and equity investments in:

- Islington Limited (iCo), a wholly owned subsidiary providing local services, a loan of £0.05m;
- Three private companies responsible for managing schools under the Building Schools for the Future programme (a loan of £0.661m);
- A local charity (a loan of £0.090m);
- Equity investment in a private company responsible for managing schools under the Building Schools for the Future programme (fair value of £0.096m)

**Governance:** Decisions on service investments are made by the relevant service manager in consultation with the Director of Finance and must meet the criteria and limits laid down in the investment strategy. Most loans and shares are capital expenditure and purchases will therefore also be approved as part of the capital programme.

- Further details on service investments can be found within the Investment Strategy at **Appendix E3**.

### **Commercial Activities**

The council hold investment property (value of £32.6m as at 31/03/2021) in order to generate income to spend on services in Islington. The council has consistently taken a prudent approach to this – no new commercial properties have been purchased in recent years and there are no current plans to invest in commercial properties over the medium term. In November 2020 PWLB guidance was updated and PWLB loans are no longer available to local authorities planning to buy investment assets primarily for yield. The authority intends to avoid this activity in order to retain its access to PWLB loans.

The council also has a wholly owned subsidiary – Islington Limited (iCo), the purpose of which is to trade for profit with public bodies, private organisations and members of the public to provide a return to the council. The services provided by iCo are in activities related to municipal functions in which relevant expertise is held (for instance Commercial Waste, Tree Maintenance and Memorials). The council has loaned iCo £0.050m, which is due to be repaid in 2021/22.

**Governance:** If and when the council does engage in further commercial activity, the council will consider fully its risk exposure against financial returns in order to ensure that commercial investments remain proportionate to the size of the authority with appropriate contingency plans in place should expected yields not materialise. If the council did decide to make a commercial investment it is unlikely that the council would invest in assets outside of the borough and would only do so where there were strategic benefits for the council (e.g. in respect of regeneration).

Decisions on commercial investments are to be made by senior officers in line with the criteria and limits approved by council in the Investment Strategy. Property and most other commercial investments are also capital expenditure.

- Further details on commercial investments and limits on their use are available in the Investment Strategy (**Appendix E3**).

### **Liabilities**

In addition to debt of £384m detailed above, the authority is committed to making future payments to cover its pension fund deficit (£249m as at the last valuation setting contributions – 31st March 2019). The council has also set aside provisions to cover probable liabilities that can be measured reliably. The most significant of these are the NNDR appeals provision (£9.9m as at 31/03/202 in terms of the council's share, £33.2m in total including the central government and GLA shares) and the insurance fund provision (£16.7m as at 31/03/2021). The insurance fund provision covers anticipated liabilities for Errors and Omissions, Libel and Slander, Motor (Third Party), Employers' Liability, Public Liability, Fire and other risks – up to a specific limit for any one claim. External policies cover claims in excess of these limits.

**Governance:** Decisions on incurring new discretionary liabilities are taken by service managers in consultation with the Director of Finance and Director of Resources/Section 151 Officer. The risk of liabilities crystallising and requiring payment is monitored by corporate finance and reported as part of the annual closing of accounts process and as appropriate during the financial year. Corporate risks and risk management are also reported to Executive.

- Further details on liabilities and guarantees in the 2020/21 statement of accounts.

### **Revenue Budget Implications**

Although capital expenditure is not charged directly to the revenue budget, interest payable on loans and MRP are charged to revenue, offset by any investment income

receivable. The net annual charge is known as financing costs; this is compared to the net revenue stream i.e., the amount funded from Council Tax, business rates and general government grants.

**Table 10: Prudential Indicator: Proportion of financing costs to net revenue stream**

	<b>2020/21 actual</b>	<b>2021/22 forecast</b>	<b>2022/23 budget</b>	<b>2023/24 budget</b>	<b>2024/25 budget</b>
Financing costs (£m)	6.845	6.697	8.088	11.125	14.987
Proportion of net revenue stream	3.0%	3.3%	3.9%	5.3%	7.2%

**Sustainability:** Due to the very long-term nature of capital expenditure and financing, the revenue budget implications of expenditure incurred in the next few years will extend for many years into the future. The Section 151 Officer is satisfied that the proposed capital programme is prudent, affordable and sustainable because revenue costs of borrowing have been fully incorporated in the 2022/23 revenue budget and MTFs. Additionally, the council is moving towards the development of a ten-year capital programme, and indicative requirements to 2031/32 are known. This enhanced long term budgetary planning will continue to be developed.

**Knowledge and Skills:**

The Authority employs professionally qualified and experienced staff in senior positions with responsibility for making capital expenditure, borrowing and investment decisions. The Authority pays for junior staff to study towards relevant professional qualifications including CIPFA (Chartered Institute of Public Finance and Accountancy).

Where Authority staff do not have the knowledge and skills required, use is made of external advisers and consultants that are specialists in their field. The Authority currently employs Arlingclose Limited as treasury management advisers. This approach is more cost effective than employing such staff directly and ensures that the Authority has access to knowledge and skills commensurate with its risk appetite.

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## **Appendix E3: Investment Strategy Report 2022/23**

### **Introduction**

The Authority invests its money for three broad purposes:

- because it has surplus cash as a result of its day-to-day activities, for example when income is received in advance of expenditure (known as **treasury management investments**),
- to support local public services by lending to or buying shares in other organisations (**service investments**), and
- to earn investment income (known as **commercial investments** where this is the main purpose).

This investment strategy meets the requirements of statutory guidance issued by the government in January 2018 and focuses on the second and third of these categories.

### **Treasury Management Investments**

The Authority typically receives its income in cash (e.g. from taxes and grants) before it pays for its expenditure in cash (e.g. through payroll and invoices). It also holds reserves for future expenditure and collects local taxes on behalf of other local authorities and central government. These activities, plus the timing of borrowing decisions, lead to a cash surplus which is invested in accordance with guidance from the Chartered Institute of Public Finance and Accountancy.

**Contribution:** The contribution that these investments make to the objectives of the Authority is to support effective treasury management activities.

**Further details:** Full details of the Authority's policies and its plan for 2022/23 for treasury management investments are covered in a separate document, the treasury management strategy, available at **Appendix E5**.

### **Service Investments: Loans**

**Contribution:** The Council lends money to its subsidiaries, local businesses, local charities, local residents and its employees to support local public services and stimulate local economic growth.

The council has lent £0.050m to its wholly owned subsidiary, Islington Limited (iCo), at market rate. The loan serves to support the working capital of iCo where the timings of its payments and receipts do not coincide.

In addition, as at 31/03/2021, the council had lent £0.661m (including accrued interest) to three private companies responsible for managing schools under the Building Schools for the Future programme (Transform Islington Phase 1 Holdings Limited, Transform Islington Phase 2 Holdings Limited and Transform Islington Limited). All loans were issued at market rates.

Where loans are advanced at below market rates they are classed as 'soft loans'. As at 31/3/2021 the council had also issued around £0.952m of soft loans, mainly to employees (e.g., travel season ticket, gym membership, home computer loans).

**Security:** The main risk when making service loans is that the borrower will be unable to repay the principal lent and/or the interest due. In order to limit this risk, and ensure that total exposure to service loans remains proportionate to the size of the Authority, upper limits on the outstanding loans to each category of borrower have been set as follows:

**Table 1: Loans for service purposes in £ millions**

Category of borrower	31/3/2021 actual			2022/23
	Balance owing	Loss allowance	Net figure in accounts	Approved Limit
Subsidiaries	0.050	(0.021)	0.029	0.100
Local businesses	0.661	0.000	0.661	0.750
Local charities	0.090	0.000	0.090	0.200
Employees	0.952	0.000	0.952	1.500
<b>TOTAL</b>	<b>1.753</b>	<b>(0.021)</b>	<b>1.732</b>	<b>2.550</b>

Accounting standards require the Authority to set aside loss allowance for loans, reflecting the likelihood of non-payment. The figures for loans in the Authority's statement of accounts are shown net of this loss allowance. However, the Authority makes every reasonable effort to collect the full sum lent and has appropriate credit control arrangements in place to recover overdue repayments.

**Risk assessment:** The Authority assesses the risk of loss before entering into and whilst holding service loans. In relation to iCo, the council has representation (2 councillors and 3 senior officers) on the board and regularly monitors performance and financial risks. Regarding the soft loans available for employees, there is a process in place whereby employees can apply for the loans (season tickets, gym membership and a home computer scheme) and a monthly deduction is taken from salaries to repay this loan. There are procedures in place to deduct any remaining amount due in the event the employee leaves the organisation in their final pay cheque. In relation to the loan to a local charity, we provide grants to this organisation annually in excess of the loaned amount. In the eventuality of a default, the organisation would reclaim payments through deductions grants or any other payments we make to them. In relation to the three private companies responsible for managing schools under the Building Schools for the Future programme, the council has representation (a senior officer) on the board and regularly monitors performance and financial risks.

### **Service Investments: Shares**

**Contribution:** The Council invests in the shares of its subsidiaries and local businesses to support local public services and stimulate local economic growth.

The council holds equity investments in Islington Limited (iCo), a wholly owned subsidiary providing local services, and minority (10%) equity investments in three private companies responsible for managing schools under the Building Schools for the Future programme (Transform Islington Phase 1 Holdings Limited, Transform Islington Phase 2 Holdings Limited and Transform Islington Limited). The fair value of these shares is nil, and the shares are not traded in an active market. The council has no current plans to dispose any of these shareholdings.

**Security:** One of the risks of investing in shares is that they fall in value meaning that the initial outlay may not be recovered. In order to limit this risk, upper limits on the sum invested in each category of shares have been set as follows:

**Table 2: Shares held for service purposes in £ millions**

Category of company	31/3/2021 actual			2022/23
	Amounts invested	Gains or losses	Value in accounts	Approved Limit
Local businesses	N/A	0.092	0.092	0.150
<b>TOTAL</b>	<b>N/A</b>	<b>0.092</b>	<b>0.092</b>	<b>0.150</b>

**Risk assessment:** The Authority assesses the risk of loss before entering into and whilst holding shares. The authority has no current plans to purchase any new shareholdings. In relation to the three private companies responsible for managing schools under the Building Schools for the Future programme, the council has representation (a senior officer) on the board and regularly monitors performance and financial risks.

**Liquidity:** Liquidity risk is considered low due to the nature of the shares held, their low value in the 2020/21 Statement of the Accounts (£91.7k for Transform Islington Limited and nil for all others) and the service reasons for holding the shares over the long term.

**Non-specified Investments:** Shares are the only investment type that the Authority has identified that meets the definition of a non-specified investment in the government guidance. The limits above on share investments are therefore also the Authority's upper limits on non-specified investments. The Authority has not adopted any procedures for determining further categories of non-specified investment since none are likely to meet the definition.

### **Commercial Investments: Property**

**Contribution:** The Council invests in local and regional, commercial property with the intention of making a profit that will be spent on local public services. The market value of all such properties as at 31/3/2021 was £32.6m. The council has not purchased new commercial properties in recent years, nor does it have any plans to do so over the medium term. In 2020/21, rental income from investment property

was £2m against direct operating expenditure arising from investment property of £0.8m

The purchase cost of investment properties is not held as they do not have a revaluation reserve and all changes in value are credited/debited in the comprehensive income and expenditure statement.

**Table 3: Property held for investment purposes in £ millions**

Property	Actual	31/3/2021 actual	31/3/2022 expected
	Purchase cost*	Value in accounts	Value in accounts**
Admin Building	N/A	0.639	0.639
Advertising site	N/A	0.076	0.076
Café	N/A	0.533	0.533
Offices	N/A	25.819	25.819
Shop	N/A	0.233	0.233
Store	N/A	3.329	3.329
Warehouse	N/A	2.003	2.003
Admin Building	N/A	0.639	0.639
<b>TOTAL</b>	<b>N/A</b>	<b>32.632</b>	<b>32.632</b>
<p><b>*The council does not hold purchase cost information for investment properties as they do not have a revaluation reserve and all changes in value are credited/debited to the CIES.</b></p> <p><b>**2021/22 Valuations have not yet taken place.</b></p>			

**Security:** In accordance with government guidance, the Authority considers a property investment to be secure if its accounting valuation is at or higher than its purchase cost including taxes and transaction costs.

A fair value assessment of the Authority's investment property portfolio has been made within the past twelve months, and the underlying assets provide security for capital investment. Should the 2021/22 year-end accounts preparation and audit process value these properties below their purchase cost, then an updated investment strategy will be presented to full council detailing the impact of the loss on the security of investments and any revenue consequences arising therefrom.

**Risk assessment:** The Authority assesses the risk of loss before entering into and whilst holding property investments. The council has no current plans to purchase new investment properties.

**Liquidity:** Compared with other investment types, property is relatively difficult to sell and convert to cash at short notice and can take a considerable period to sell in certain market conditions. To ensure that the invested funds can be accessed when they are needed, for example to repay capital borrowed, the Authority ensures

dwellings are of a type and location that is marketable and has proven demand. The council also has scope to continue to generate an income stream whilst they are being marketed.

### **Loan Commitments and Financial Guarantees**

Although not strictly counted as investments, since no money has exchanged hands yet, loan commitments and financial guarantees carry similar risks to the Authority and are included here for completeness.

The council has provided a guarantee to its wholly owned subsidiary, Islington Limited (iCo), should it request it. There is currently no indication that this is likely to happen. The net current liabilities of iCo (Unaudited Statement of Accounts) as at 31/03/2020 were £0.017m.

### **Net Zero Carbon**

As a responsible investor, the council is committed to considering environmental, social, and governance issues, and has a particular interest in taking action to contribute to our strategy of Building a Net Zero Carbon Islington by 2030.

However, investment guidance, both statutory and from professional guidelines (CIPFA), dictates that investment activities must adopt 'SLY' principles – prioritising security, liquidity and yield.

There are already touch points with local authority investing, including the incorporation of Environment, Social and Governance (ESG) metrics into credit rating agency assessments. There are also a small but growing number of financial institutions and fund managers promoting ESG products. Advisors are looking at ways in which to incorporate these factors into their creditworthiness assessment service that will be shared and adopted. The council will continue to monitor this as the market develops, noting that the lack of consistency and coverage in current market products alongside the treasury management 'SLY' priorities means that it is not currently practicable to formally include ESG targets as part of our treasury management or investment strategies.

It is the council's intention to exploit the treasury strategy to further the aims of the council and it will therefore actively consider appropriate ESG products as they emerge.

### **Proportionality**

Whilst the council is dependent on some profit generating investment activity from treasury management and commercial property investments to achieve a balanced revenue budget, this amounts to less than 1% of the overall gross revenue budget and therefore is considered proportionate. The assumptions around profit generating investment activity are reviewed as part of the annual budget monitoring process and, if necessary, revised as part of the following year's budget setting process.

The 2022/23 revenue budget includes a corporate contingency budget of £5m to mitigate against budget risks.

## **Borrowing in Advance of Need**

Government guidance is that local authorities must not borrow more than or in advance of their needs purely in order to profit from the investment of the extra sums borrowed. The authority has chosen to follow this guidance. However, if market rates were to fall considerably, or future rates were expected to rise, then some borrowing could be taken ahead of spend. The borrowing strategy will therefore consider opportunities to borrow not only for 2022/23 but ahead for the next two financial years.

## **Capacity, Skills and Culture**

### **Elected members and statutory officers:**

There are a number of procedures and processes that enable elected members and statutory officers to make appropriate investment decisions, including:

- All elected members and statutory officers are aware of the council's strategic objectives.
- Training on treasury management is available and can be tailored to needs.
- The council's constitution and financial regulations determine the authorisations required for investment decisions.
- Financial and legal implications (including statutory and regulatory frameworks) are required as part of all decision-making reports.
- The council has a multi-disciplinary governance process for reviewing budget proposals, including any future commercial investment proposals.
- Specialist external advice is sought and considered where it is deemed necessary.
- The council has an embedded risk management and reporting framework.

**Commercial deals:** Financial and legal implications (including statutory and regulatory frameworks) are required as part of all decision-making reports. Specialist external advice is sought where appropriate to advise on commercial transactions. The council ensures external advisors are fully aware of the prudential framework and of the regulatory regime within which it operates.

**Corporate governance:** The authority's Annual Governance Statement details arrangements put in place to ensure accountability and responsibility for those making decisions and can be found here: [2020/21 Annual Governance Statement](#)

## **Investment Indicators**

The Authority has set the following quantitative indicators to allow elected members and the public to assess the Authority's total risk exposure as a result of its investment decisions.

**Total risk exposure:** The first indicator shows the Authority's total exposure to potential investment losses. This includes amounts the Authority is contractually committed to lend but have yet to be drawn down and guarantees the Authority has issued over third-party loans.

It is assumed that non-treasury management investments remain at the same value as in the 2020/21 Statement of Accounts given that there are no current plans to increase/decrease these investments. The future investment exposure will however be affected by valuations in the Statement of Accounts, particularly in relation to investment properties.

**Table 4: Total investment exposure in £millions**

<b>Total investment exposure</b>	<b>31/03/2021 Actual</b>	<b>31/03/2022 Forecast</b>	<b>31/03/2023 Forecast</b>
Treasury management investments	151.700	115.500	105.500
Service investments: Loans	1.740	1.740	1.740
Service investments: Shares	0.092	0.092	0.092
Commercial investments: Property	32.632	32.632	32.632
<b>TOTAL INVESTMENTS</b>	<b>186.164</b>	<b>149.964</b>	<b>139.964</b>
Guarantees issued on loans	(0.017)	(0.017)	(0.017)
<b>TOTAL EXPOSURE</b>	<b>186.157</b>	<b>149.947</b>	<b>139.947</b>

**How investments are funded:** Government guidance is that these indicators should include how investments are funded. Since the authority does not normally associate particular assets with particular liabilities, this guidance is difficult to comply with. It is assumed the authority's investments are funded by usable reserves and income received in advance of expenditure, rather than borrowing.

**Rate of return received:** This indicator shows the investment income received less the associated costs, including the cost of borrowing where appropriate, as a proportion of the sum initially invested. Note that due to the complex local government accounting framework, not all recorded gains and losses affect the revenue account in the year they are incurred. The rate of return on other investments (e.g. service loans/shares) is considered immaterial. Investment properties are not included as we do not hold the purchase cost (as explained earlier in the strategy).

**Table 5: Investment rate of return (net of all costs)**

<b>Investments net rate of return</b>	<b>2020/21 Actual</b>	<b>2021/22 Forecast</b>	<b>2022/23 Forecast</b>
Treasury management investments	0.88%	0.50%	0.25%

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### **Appendix E3: Minimum Revenue Provision Statement 2022/23**

Where the authority finances capital expenditure by debt, it must put aside resources to repay that debt in later years. The amount charged to the revenue budget for the repayment of debt is known as Minimum Revenue Provision (MRP), although there has been no statutory minimum since 2008. The Local Government Act 2003 requires the authority to have regard to the Ministry of Housing, Communities and Local Government's Guidance on Minimum Revenue Provision (the MHCLG Guidance) most recently issued in 2018.

The broad aim of the MHCLG Guidance is to ensure that capital expenditure is financed over a period that is either reasonably commensurate with that over which the capital expenditure provides benefits, or, in the case of borrowing supported by Government Revenue Support Grant, reasonably commensurate with the period implicit in the determination of that grant.

The MHCLG Guidance requires the authority to approve an Annual MRP Statement each year and recommends options for calculating a prudent amount of MRP. The following statement incorporates options recommended in the Guidance:

- For unsupported capital expenditure incurred after 31<sup>st</sup> March 2008, MRP is determined by charging the expenditure over the expected useful life of the relevant asset as the principal repayment on an annuity with an annual interest rate equal to the average 20-year PWLB rate for the year of expenditure, starting in the year after the asset becomes operational. MRP on purchases of freehold land is charged over 50 years. MRP on expenditure not related to fixed assets but which has been capitalised by regulation or direction is charged over 20 years.
- For assets acquired by leases or the Private Finance Initiative, MRP is determined as being equal to the element of the rent or charge that goes to write down the balance sheet liability. However, for long life or high value PFI contracts, MRP is spread across the expected life of the asset, in equal instalments.
- Where former operating leases have been brought onto the balance sheet on 1st April 2022 due to the adoption of the IFRS 16 Leases accounting standard, and the asset values have been adjusted for accruals, prepayments, premiums and/or discounts, then the annual MRP charges will be adjusted so that the total charge to revenue remains unaffected by the new standard.
- No MRP is charged in respect of assets held within the Housing Revenue Account.

Capital expenditure incurred during 2022/23 will not be subject to a MRP charge until 2023/24.

Based on the authority's latest estimate of its capital financing requirement (CFR) on 31<sup>st</sup> March 2022, the budget for MRP has been set as follows:

	<b>31.03.2022 Estimated CFR £m</b>	<b>2022/23 Estimated MRP £</b>
Capital expenditure before 01.04.2008	89.416	0.981
Unsupported capital expenditure after 31.03.2008	88.414	3.456
Leases and Private Finance Initiative	84.027	0.000
<b>Total General Fund</b>	<b>261.857</b>	<b>4.437</b>
<b>Total Housing Revenue Account</b>	<b>476.163</b>	<b>0.000</b>
<b>Total</b>	<b>738.020</b>	<b>0.000</b>

## **Appendix E5: Treasury Management Strategy Statement 2022/23**

### **Introduction**

Treasury management is the management of the council's cash flows, borrowing and investments, and the associated risks. The council has substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of financial risk are therefore central to the council's prudent financial management.

Treasury risk management at the council is conducted within the framework of the Chartered Institute of Public Finance and Accountancy's *Treasury Management in the Public Services: Code of Practice 2017 Edition* (the CIPFA Code) which requires the council to approve a treasury management strategy before the start of each financial year. This report fulfils the Authority's legal obligation under the *Local Government Act 2003* to have regard to the CIPFA Code.

Investments held for service purposes or for commercial profit are considered in a different report, the Investment Strategy (**Appendix E3**).

### **External Context**

**Economic background:** The ongoing impact on the UK from coronavirus, together with higher inflation, higher interest rates, and the country's trade position post-Brexit, will be major influences on the Authority's treasury management strategy for 2022/23.

The Bank of England (BoE) increased Bank Rate to 0.25% in December 2021 while maintaining its Quantitative Easing programme at £895bn. The Monetary Policy Committee (MPC) voted 8-1 in favour of raising rates, and unanimously to maintain the asset purchase programme.

Within the announcement the MPC noted that the pace of the global recovery was broadly in line with its November Monetary Policy Report. Prior to the emergence of the Omicron coronavirus variant, the Bank also considered the UK economy to be evolving in line with expectations, however the increased uncertainty and risk to activity the new variant presents, the Bank revised down its estimates for Q4 GDP growth to 0.6% from 1.0%. Inflation was projected to be higher than previously forecast, with CPI likely to remain above 5% throughout the winter and peak at 6% in April 2022. The labour market was generally performing better than previously forecast and the BoE now expects the unemployment rate to fall to 4% compared to 4.5% forecast previously, but notes that Omicron could weaken the demand for labour.

UK CPI for November 2021 registered 5.1% year on year, up from 4.2% in the previous month. Core inflation, which excludes the more volatile components, rose to 4.0% y/y from

3.4%. The most recent labour market data for the three months to October 2021 showed the unemployment rate fell to 4.2% while the employment rate rose to 75.5%.

In October 2021, the headline 3-month average annual growth rate for wages were 4.9% for total pay and 4.3% for regular pay. In real terms, after adjusting for inflation, total pay growth was up 1.7% while regular pay was up 1.0%. The change in pay growth has been affected by a change in composition of employee jobs, where there has been a fall in the number and proportion of lower paid jobs.

Gross domestic product (GDP) grew by 1.3% in the third calendar quarter of 2021 according to the initial estimate, compared to a gain of 5.5% q/q in the previous quarter, with the annual rate slowing to 6.6% from 23.6%. The Q3 gain was modestly below the consensus forecast of a 1.5% q/q rise. During the quarter activity measures were boosted by sectors that reopened following pandemic restrictions, suggesting that wider spending was flat. Looking ahead, while monthly GDP readings suggest there had been some increase in momentum in the latter part of Q3, Q4 growth is expected to be soft.

GDP growth in the euro zone increased by 2.2% in calendar Q3 2021 following a gain of 2.1% in the second quarter and a decline of -0.3% in the first. Headline inflation has been strong, with CPI registering 4.9% year-on-year in November, the fifth successive month of inflation. Core CPI inflation was 2.6% y/y in November, the fourth month of successive increases from July's 0.7% y/y. At these levels, inflation is above the European Central Bank's target of 'below, but close to 2%', putting some pressure on its long-term stance of holding its main interest rate of 0%.

The US economy expanded at an annualised rate of 2.1% in Q3 2021, slowing sharply from gains of 6.7% and 6.3% in the previous two quarters. In its December 2021 interest rate announcement, the Federal Reserve continue to maintain the Fed Funds rate at between 0% and 0.25% but outlined its plan to reduce its asset purchase programme earlier than previously stated and signalled they are in favour of tightening interest rates at a faster pace in 2022, with three 0.25% movements now expected.

**Credit outlook:** Since the start of 2021, relatively benign credit conditions have led to credit default swap (CDS) prices for the larger UK banks to remain low and had steadily edged down throughout the year up until mid-November when the emergence of Omicron has caused them to rise modestly. However, the generally improved economic outlook during 2021 helped bank profitability and reduced the level of impairments many had made as provisions for bad loans. However, the relatively recent removal of coronavirus-related business support measures by the government means the full impact on bank balance sheets may not be known for some time.

The improved economic picture during 2021 led the credit rating agencies to reflect this in their assessment of the outlook for the UK sovereign as well as several financial institutions, revising them from negative to stable and even making a handful of rating upgrades.

Looking ahead, while there is still the chance of bank losses from bad loans as government and central bank support is removed, the institutions on the Authority's counterparty list are well-capitalised and general credit conditions across the sector are expected to remain benign. Duration limits for counterparties on the Authority's lending list are under regular review and will continue to reflect economic conditions and the credit outlook.

**Interest rate forecast:** The Authority's treasury management adviser Arlingclose is forecasting that Bank Rate will continue to rise in calendar Q1 2022 to subdue inflationary pressures and the perceived desire by the BoE to move away from emergency levels of interest rates.

Investors continue to price in multiple rises in Bank Rate over the next forecast horizon, and Arlingclose believes that although interest rates will rise again, the increases will not be to the extent predicted by financial markets. In the near-term, the risks around Arlingclose's central case are to the upside while over the medium-term the risks become more balanced.

Yields are expected to remain broadly at current levels over the medium-term, with the 5-, 10- and 20-year gilt yields expected to average around 0.65%, 0.90%, and 1.15% respectively. The risks around for short and medium-term yields are initially to the upside but shifts lower later, while for long-term yields the risk is to the upside. However, as ever there will almost certainly be short-term volatility due to economic and political uncertainty and events.

**Underlying assumptions:**

- The global recovery from the pandemic has entered a more challenging phase. The resurgence in demand has led to the expected rise in inflationary pressure, but disrupted factors of supply are amplifying the effects, increasing the likelihood of lower growth rates ahead. The advent of the Omicron variant of coronavirus is affecting activity and is also a reminder of the potential downside risks.
- Despite relatively buoyant activity survey data, official GDP data indicates that growth was weakening into Q4 2021. Other data, however, suggested continued momentum, particularly for November. Retail sales volumes rose 1.4%, PMIs increased, and the labour market continued to strengthen. The end of furlough did not appear to have had a significant impact on unemployment. Wage growth is elevated.
- The CPI inflation rate rose to 5.1% for November and will rise higher in the near term. While the transitory factors affecting inflation are expected to unwind over time, policymakers' concern is persistent medium term price pressure.
- These factors prompted the MPC to raise Bank Rate to 0.25% at the December meeting. Short term interest rate expectations remain elevated.
- The outlook, however, appears weaker. Household spending faces pressures from a combination of higher prices and tax rises. In the immediate term, the Omicron variant has already affected growth – Q4 and Q1 activity could be weak at best.

- Longer-term government bond yields remain relatively low despite the more hawkish signals from the BoE and the Federal Reserve. Investors are concerned that significant policy tightening in the near term will slow growth and prompt the need for looser policy later. Geo-political and coronavirus risks are also driving safe haven buying. The result is a much flatter yield curve, as short-term yields rise even as long-term yields fall.
- The rise in Bank Rate despite the Omicron variant signals that the MPC will act to bring inflation down whatever the environment. It has also made clear its intentions to tighten policy further. While the economic outlook will be challenging, the signals from policymakers suggest their preference is to tighten policy unless data indicates a more severe slowdown.

### Forecast:

- The MPC will want to build on the strong message it delivered this month by tightening policy despite Omicron uncertainty.
- Arlingclose therefore expects Bank Rate to rise to 0.50% in Q1 2022, but then remain there. Risks to the forecast are initially weighted to the upside but becoming more balanced over time. The Arlingclose central forecast remains below the market forward curve.
- Gilt yields will remain broadly flat from current levels. Yields have fallen sharply at the longer end of the yield curve, but expectations of a rise in Bank Rate have maintained short term gilt yields at higher levels.
- Easing expectations for Bank Rate over time could prompt the yield curve to steepen, as investors build in higher inflation expectations.
- The risks around the gilt yield forecasts vary. The risk for short- and medium-term yields is initially on the upside but shifts lower later. The risk for long-term yields is weighted to the upside.

	Dec-21	Mar-22	Jun-22	Sep-22	Dec-22	Mar-23	Jun-23	Sep-23	Dec-23	Mar-24	Jun-24	Sep-24	Dec-24
<b>Official Bank Rate</b>													
Upside risk	0.00	0.00	0.25	0.25	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50
Arlingclose Central Case	0.25	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50
Downside risk	0.00	-0.25	-0.25	-0.25	-0.25	-0.25	-0.25	-0.25	-0.25	-0.25	-0.25	-0.25	-0.25
<b>3-month money market rate</b>													
Upside risk	0.05	0.05	0.25	0.35	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50
Arlingclose Central Case	0.25	0.55	0.55	0.60	0.60	0.60	0.60	0.65	0.65	0.65	0.65	0.65	0.65
Downside risk	0.00	-0.25	-0.25	-0.30	-0.30	-0.30	-0.30	-0.35	-0.35	-0.35	-0.35	-0.35	-0.35
<b>5yr gilt yield</b>													
Upside risk	0.00	0.35	0.45	0.55	0.55	0.55	0.55	0.55	0.55	0.50	0.50	0.45	0.45
Arlingclose Central Case	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.65	0.70	0.75	0.75
Downside risk	-0.10	-0.20	-0.25	-0.25	-0.25	-0.25	-0.25	-0.25	-0.25	-0.30	-0.35	-0.40	-0.40
<b>10yr gilt yield</b>													
Upside risk	0.10	0.25	0.35	0.40	0.45	0.50	0.50	0.50	0.50	0.50	0.55	0.55	0.55
Arlingclose Central Case	0.80	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.90	0.90	0.95	0.95
Downside risk	-0.10	-0.25	-0.30	-0.35	-0.35	-0.35	-0.35	-0.35	-0.35	-0.40	-0.40	-0.40	-0.40
<b>20yr gilt yield</b>													
Upside risk	0.30	0.40	0.45	0.45	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50
Arlingclose Central Case	1.00	1.05	1.10	1.10	1.10	1.10	1.15	1.15	1.15	1.20	1.20	1.20	1.20
Downside risk	-0.15	-0.30	-0.35	-0.40	-0.40	-0.40	-0.40	-0.40	-0.40	-0.45	-0.45	-0.45	-0.45
<b>50yr gilt yield</b>													
Upside risk	0.25	0.30	0.40	0.45	0.45	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50
Arlingclose Central Case	0.70	0.75	0.80	0.85	0.90	0.95	1.00	1.05	1.05	1.10	1.10	1.15	1.15
Downside risk	-0.15	-0.30	-0.35	-0.40	-0.40	-0.40	-0.40	-0.40	-0.40	-0.45	-0.45	-0.45	-0.45

PWLB Standard Rate (Maturity Loans) = Gilt yield + 1.00%  
PWLB Certainty Rate (Maturity Loans) = Gilt yield + 0.80%  
PWLB Infrastructure Rate (Maturity Loans) = Gilt yield + 0.60%

For the purpose of setting the budget, it has been assumed that new treasury investments will be made at an average rate of 0.25%, and that new long-term loans will be borrowed at an average rate of 2.5%.

### **Local Context**

On 31<sup>st</sup> January 2022, the Authority held £278.275m of borrowing and £155.500m of treasury investments. Forecast changes in these sums are shown in the balance sheet analysis in **Table 1** below.

**Table 1: Balance sheet summary and forecast**

	<b>31.3.21 Actual £m</b>	<b>31.3.22 Estimate £m</b>	<b>31.3.23 Forecast £m</b>	<b>31.3.24 Forecast £m</b>	<b>31.3.25 Forecast £m</b>
General Fund CFR	141.096	153.837	190.075	234.151	296.071
HRA CFR	466.254	500.156	559.932	591.126	614.725
PFI CFR	96.370	83.058	78.461	74.007	69.136
<b>Total CFR</b>	<b>703.720</b>	<b>737.051</b>	<b>828.468</b>	<b>899.484</b>	<b>980.131</b>
Less: Other debt liabilities *	(96.370)	(83.058)	(78.461)	(74.007)	(69.136)
<b>Loans CFR</b>	<b>607.350</b>	<b>653.993</b>	<b>750.007</b>	<b>825.477</b>	<b>910.996</b>
Less: External borrowing **	(371.609)	(273.275)	(244.607)	(221.546)	(192.878)
<b>Internal (over) borrowing</b>	<b>235.741</b>	<b>380.718</b>	<b>505.400</b>	<b>603.931</b>	<b>718.118</b>
Less: Balance Sheet Resources	(387.441)	(496.218)	(484.555)	(483.779)	(478.910)
<b>(Treasury investments)/ New borrowing</b>	<b>(151.700)</b>	<b>(115.500)</b>	<b>20.845</b>	<b>120.152</b>	<b>239.208</b>

\*Leases and PFI liabilities that form part of the Authority's total debt

\*\*shows only loans to which the Authority is committed and excludes optional refinancing

The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement (CFR), while usable reserves and working capital are the underlying resources available for investment. The Authority's current strategy is to maintain borrowing and investments below their underlying levels, sometimes known as internal borrowing.

CIPFA's *Prudential Code for Capital Finance in Local Authorities* recommends that the Authority's total debt should be lower than its highest forecast CFR over the next three years. The Authority expects to comply with this recommendation during 2022/23.

**Liability benchmark:** To compare the Council's actual borrowing against an alternative strategy, a liability benchmark has been calculated showing the lowest risk level of borrowing (**Table 2**). This assumes the same forecasts as **Table 1** above, but that cash and investment balances are kept to a minimum level of £10m at each year end to maintain sufficient liquidity but minimise credit risk.

**Table 2: Liability benchmark**

	<b>31.3.21 Actual £m</b>	<b>31.3.22 Estimate £m</b>	<b>31.3.23 Forecast £m</b>	<b>31.3.24 Forecast £m</b>	<b>31.3.25 Forecast £m</b>
<b>Loans CFR</b>	<b>607.350</b>	<b>653.993</b>	<b>750.007</b>	<b>825.477</b>	<b>910.996</b>
Less: Balance Sheet Resources	(387.441)	(496.218)	(484.555)	(483.779)	(478.910)
<b>Net Loans Requirement</b>	<b>219.909</b>	<b>157.775</b>	<b>265.452</b>	<b>341.698</b>	<b>432.086</b>
Plus: Liquidity Allowance	10.000	10.000	10.000	10.000	10.000
<b>Liability benchmark</b>	<b>229.909</b>	<b>167.775</b>	<b>275.452</b>	<b>351.698</b>	<b>442.086</b>

**Borrowing Strategy**

The Authority currently holds £278.275m of loans, a decrease of £93.334m since 31<sup>st</sup> March 2021, as part of its strategy for funding previous years' capital programmes. The Authority expects to have to hold external debt of up to £363.726m in 2022/23, an increase of £85.451m on the current level. However, the Authority may also borrow additional sums to pre-fund future years' requirements, providing this does not exceed the authorised limit for borrowing of £463.726m.

**Objectives:** The Authority's chief objective when borrowing money is to strike an appropriately low risk balance between securing low interest costs and achieving certainty of those costs over the period for which funds are required. The flexibility to renegotiate loans should the Authority's long-term plans change is a secondary objective.

**Strategy:** Given the significant cuts to public expenditure and to local government funding, the Authority's borrowing strategy continues to address the key issue of affordability without compromising the longer-term stability of the debt portfolio. With short-term interest rates currently much lower than long-term rates, it is likely to be more cost effective in the short-term to either use internal resources, or to borrow short-term loans instead.

By doing so, the Authority can reduce net borrowing costs (despite foregone investment income) and reduce overall treasury risk. The benefits of internal and short-term borrowing will be monitored regularly against the potential for incurring additional costs by deferring borrowing into future years when long-term borrowing rates are forecast to rise modestly. Arlingclose will assist the Authority with this 'cost of carry' and breakeven analysis. Its output may determine whether the Authority borrows additional sums at long-term fixed rates in 2022/23 with a view to keeping future interest costs low, even if this causes additional cost in the short-term.

The Authority has previously raised most of its long-term borrowing from the PWLB but will consider long-term loans from other sources including banks, pensions and local authorities,

and will investigate the possibility of issuing bonds and similar instruments, in order to lower interest costs and reduce over-reliance on one source of funding in line with the CIPFA Code. PWLB loans are no longer available to local authorities planning to buy investment assets primarily for yield; the Authority intends to avoid this activity in order to retain its access to PWLB loans.

Alternatively, the Authority may arrange forward starting loans, where the interest rate is fixed in advance, but the cash is received in later years. This would enable certainty of cost to be achieved without suffering a cost of carry in the intervening period.

In addition, the Authority may borrow short-term loans to cover unplanned cash flow shortages.

**Sources of borrowing:** The approved sources of long-term and short-term borrowing are:

1. HM Treasury's PWLB lending facility (formerly the Public Works Loan Board)
2. any institution approved for investments (see below)
3. any other bank or building society authorised to operate in the UK
4. any other UK public sector body
5. UK public and private sector pension funds (except Islington Pension Fund)
6. capital market bond investors
7. UK Municipal Bonds Agency plc and other special purpose companies created to enable local authority bond issues
8. Individuals lending via a peer-to-peer platform where appropriate counterparty checks are conducted by the platform
9. Investors in capital market bonds and retail bonds issued by the Council

**Other sources of debt finance:** In addition, capital finance may be raised by the following methods that are not borrowing, but may be classed as other debt liabilities:

10. leasing
11. hire purchase
12. Private Finance Initiative
13. sale and leaseback

Municipal Bonds Agency: UK Municipal Bonds Agency plc was established in 2014 by the Local Government Association as an alternative to the PWLB. It issues bonds on the capital markets and lends the proceeds to local authorities. This is a more complicated source of finance than the PWLB for two reasons: borrowing authorities will be required to provide investors with a guarantee to refund their investment if the agency is unable to for any reason; and there will be a lead time of several months between committing to borrow and knowing the interest rate payable. Any decision to borrow from the Agency will therefore be the subject of a separate report to full Council

LOBOs: Islington Council holds no LOBO (Lender's Option Borrower's Option) loans where the lender has the option to propose an increase in the interest rate at set dates, following which the council has the option either to accept the new rate or to repay the loan at no additional cost.

Debt rescheduling: The PWLB allows authorities to repay loans before maturity and either pay a premium or receive a discount according to a set formula based on current interest rates. Other lenders may also be prepared to negotiate premature redemption terms. They may take advantage of this and replace some loans with new loans, or repay loans without replacement, where this is expected to lead to an overall cost saving or a reduction in risk.

### **Treasury Investment Strategy**

The council holds invested funds, representing income received in advance of expenditure plus balances and reserves held. In the past 12 months, the council's treasury investment balance has ranged between £100m and £200m, and similar levels are expected to be maintained in the forthcoming year.

Objectives: The CIPFA Code requires the council to invest its treasury funds prudently, and to have regard to the security and liquidity of its investments before seeking the highest rate of return, or yield. The council's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income. Where balances are expected to be invested for more than one year, the council will aim to achieve a total return that is equal or higher than the prevailing rate of inflation, in order to maintain the spending power of the sum invested.

Negative interest rates: The COVID-19 pandemic has increased the risk that the Bank of England will set its Bank Rate at or below zero, which is likely to feed through to negative interest rates on all low risk, short-term investment options. Since investments cannot pay negative income, negative rates will be applied by reducing the value of investments. In this event, security will be measured as receiving the contractually agreed amount at maturity, even though this may be less than the amount originally invested.

Strategy: Given the increasing risk and very low returns from short-term unsecured bank investments, the council aims to reduce its temporary debt and majority of the council's surplus cash currently remains invested in short-term unsecured bank deposits, DMO and other local authorities and money market funds. This diversification will represent a continuation of the strategy.

Business models: Under the new IFRS 9 standard, the accounting for certain investments depends on the Authority's "business model" for managing them. The council aims to achieve value from its treasury investments by a business model of collecting the contractual cash

flows and therefore, where other criteria are also met, these investments will continue to be accounted for at amortised cost.

Approved counterparties: The Authority may invest its surplus funds with any of the counterparty types in Appendix C-Approved counterparty list, subject to the limits shown.

The Council has reviewed the way it formulates its counterparty criteria. The lending list criteria is devised from the use of rating agencies which will include) as well as other factors. The main sovereign states whose banks are to be included are Australia, Canada, Finland, France, Denmark, Germany, Netherlands, Switzerland and the US. These countries and the Banks within them have been selected after analysis and careful monitoring of:

- Credit Ratings (minimum long-term A+ minimum short term F1).
- Credit Default Swaps.
- GDP; Net Debt as a Percentage of GDP.
- Sovereign Support Mechanisms / potential support from a well-resourced parent institution.
- Share Price.

The Council has restricted its investment activity to the following institutions while conditions in the financial sector are monitored for stability and cashflow positions are averaging around £100m.

- The Debt Management Agency Deposit Facility (The rates of interest from the DMADF are below equivalent money market rates. However, the returns are an acceptable trade-off for the guarantee that the Council's capital is secure).
- AAA-rated Money Market Funds with a Constant Net Asset Value (CNAV) and Variable Net Asset Value (VNAV).
- Deposits with other local authorities.
- Business reserve accounts and term deposits. These have been primarily restricted to UK institutions that are rated at least A+ long term.

**Government:** Loans to, and bonds and bills issued or guaranteed by, national governments, regional and local authorities and multilateral development banks. These investments are not subject to bail-in, and there is generally a lower risk of insolvency, although they are not zero risk. Investments with the UK Government are deemed to be zero credit risk due to its ability to create additional currency and therefore may be made in unlimited amounts for up to 50 years.

**Secured investments:** Investments secured on the borrower's assets, which limits the potential losses in the event of insolvency. The amount and quality of the security will be a key factor in the investment decision. Covered bonds and reverse repurchase agreements with banks and building societies are exempt from bail-in. Where there is no investment specific credit rating, but the collateral upon which the investment is secured has a credit

rating, the higher of the collateral credit rating and the counterparty credit rating will be used. The combined secured and unsecured investments with any one counterparty will not exceed the cash limit for secured investments.

**Banks and building societies (unsecured):** Accounts, deposits, certificates of deposit and senior unsecured bonds with banks and building societies, other than multilateral development banks. These investments are subject to the risk of credit loss via a bail-in should the regulator determine that the bank is failing or likely to fail. See below for arrangements relating to operational bank accounts.

**Registered providers (unsecured):** Loans to, and bonds issued or guaranteed by, registered providers of social housing or registered social landlords, formerly known as housing associations. These bodies are regulated by the Regulator of Social Housing (in England), the Scottish Housing Regulator, the Welsh Government and the Department for Communities (in Northern Ireland). As providers of public services, they retain the likelihood of receiving government support if needed.

**Money market funds:** Pooled funds that offer same-day or short notice liquidity and very low or no price volatility by investing in short-term money markets. They have the advantage over bank accounts of providing wide diversification of investment risks, coupled with the services of a professional fund manager in return for a small fee. Although no sector limit applies to money market funds, the Authority will take care to diversify its liquid investments over a variety of providers to ensure access to cash at all times.

**Strategic pooled funds:** Bond, equity and property funds that offer enhanced returns over the longer term but are more volatile in the short term. These allow the Authority to diversify into asset classes other than cash without the need to own and manage the underlying investments. Because these funds have no defined maturity date, but are available for withdrawal after a notice period, their performance and continued suitability in meeting the Authority's investment objectives will be monitored regularly.

**Real estate investment trusts:** Shares in companies that invest mainly in real estate and pay most of their rental income to investors in a similar manner to pooled property funds. As with property funds, REITs offer enhanced returns over the longer term, but are more volatile especially as the share price reflects changing demand for the shares as well as changes in the value of the underlying properties.

**Other investments:** This category covers treasury investments not listed above, for example unsecured corporate bonds and company loans. Non-bank companies cannot be bailed-in but can become insolvent placing the Authority's investment at risk.

**Net Zero Carbon:** As a responsible investor, the council is committed to considering environmental, social, and governance issues, and has a particular interest in taking action to contribute to our strategy of Building a Net Zero Carbon Islington by 2030. However,

investment guidance, both statutory and from professional guidelines (CIPFA), dictates that investment activities must adopt 'SLY' principles – prioritising security, liquidity and yield. There are already touch points with local authority investing, including the incorporation of Environment, Social and Governance (ESG) metrics into credit rating agency assessments. There are also a small but growing number of financial institutions and fund managers promoting ESG products. Advisors are looking at ways in which to incorporate these factors into their creditworthiness assessment service that will be shared and adopted. The council will continue to monitor this as the market develops, noting that the lack of consistency and coverage in current market products alongside the treasury management 'SLY' priorities means that it is not currently practicable to formally include ESG targets as part of our treasury management or investment strategies. It is the council's intention to take opportunities within the overall treasury strategy to further the aims of the council and it will therefore actively consider appropriate ESG products as they emerge.

**Operational bank accounts:** The council may incur operational exposures, for example through current accounts, collection accounts and merchant acquiring services, to any UK bank with credit ratings no lower than BBB- and with assets greater than £25bn. These are not classed as investments but are still subject to the risk of a bank bail-in, and balances will therefore be kept below £30m per bank. The Bank of England has stated that in the event of failure, banks with assets greater than £25bn are more likely to be bailed-in than made insolvent, increasing the chance of the council maintaining operational continuity.

**Risk assessment and credit ratings:** Credit ratings are obtained and monitored by the Authority's treasury advisers, who will notify changes in ratings as they occur. The credit rating agencies in current use are listed in the Treasury Management Practices document. Where an entity has its credit rating downgraded so that it fails to meet the approved investment criteria then:

1. no new investments will be made,
2. any existing investments that can be recalled or sold at no cost will be, and
3. full consideration will be given to the recall or sale of all other existing investments with the affected counterparty.

Where a credit rating agency announces that a credit rating is on review for possible downgrade (also known as "negative watch") so that it may fall below the approved rating criteria, then only investments that can be withdrawn will be made with that organisation until the outcome of the review is announced. This policy will not apply to negative outlooks, which indicate a long-term direction of travel rather than an imminent change of rating.

Other information on the security of investments: The council understands that credit ratings are good, but not perfect, predictors of investment default. Full regard will therefore be given to other available information on the credit quality of the organisations in which it invests, including credit default swap prices, financial statements, information on potential

government support, reports in the quality financial press and analysis and advice from the council's treasury management adviser. No investments will be made with an organisation if there are substantive doubts about its credit quality, even though it may otherwise meet the above criteria.

When deteriorating financial market conditions affect the creditworthiness of all organisations, as happened in 2008 and 2020, this is not generally reflected in credit ratings, but can be seen in other market measures. In these circumstances, the council will restrict its investments to those organisations of higher credit quality and reduce the maximum duration of its investments to maintain the required level of security. The extent of these restrictions will be in line with prevailing financial market conditions. If these restrictions mean that insufficient commercial organisations of high credit quality are available to invest the Authority's cash balances, then the surplus will be deposited with the UK Government, or with other local authorities. This will cause investment returns to fall but will protect the principal sum invested.

**Investment limits:** In order to limit risk in the case of a single default, the maximum that will be lent to any one organisation (other than the UK Government) will be £15m. A group of entities under the same ownership will be treated as a single organisation for limit purposes.

Limits are also placed on fund managers, investments in brokers' nominee accounts and foreign countries as below. Investments in pooled funds and multilateral development banks do not count against the limit for any single foreign country, since the risk is diversified over many countries.

**Liquidity management:** The Authority uses purpose-built cash flow forecasting to determine the maximum period for which funds may prudently be committed. The forecast is compiled on a prudent basis to minimise the risk of the Authority being forced to borrow on unfavourable terms to meet its financial commitments. Limits on long-term investments are set by reference to the Authority's medium-term financial plan and cash flow forecast.

### **Treasury Management Indicators**

The Authority measures and manages its exposures to treasury management risks using the following indicators.

**Security:** The Authority has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average credit rating of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc.) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

Credit risk indicator	Target
Portfolio average credit	A+

**Liquidity:** The Authority has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within a rolling one-month period, without additional borrowing.

Liquidity risk indicator	Target
Total cash available within 3 months	£25m

**Interest rate exposures:** This indicator is set to control the Authority's exposure to interest rate risk. The upper limits on the one-year revenue impact of a 1% rise or fall in interest rates will be:

Interest rate risk indicator	Limit
Upper limit on one-year revenue impact of a 1% rise in interest rates	£5,904,500
Upper limit on one-year revenue impact of a 1% fall in interest rates	£2,530,500

The impact of a change in interest rates is calculated on the assumption that maturing loans and investments will be replaced at new market rates.

**Maturity structure of borrowing:** This indicator is set to control the Authority's exposure to refinancing risk. The upper and lower limits on the maturity structure of borrowing will be:

Refinancing rate risk indicator	Upper limit	Lower limit
Under 12 months	100%	12%
12 months and within 24 months	100%	5%
24 months and within 5 years	100%	16%
5 years and within 10 years	100%	7%
10 years and within 20 years	100%	20%

Time periods start on the first day of each financial year. The maturity date of borrowing is the earliest date on which the lender can demand repayment.

**Principal sums invested for periods longer than a year:** The purpose of this indicator is to control the Authority's exposure to the risk of incurring losses by seeking early repayment of its investments. The limits on the long-term principal sum invested to final maturities beyond the period end will be:

<b>Price risk indicator</b>	<b>2022/23</b>	<b>2023/24</b>	<b>2024/25</b>
Limit on principal invested beyond year end	£30m	£20m	£20m

**Related Matters** The CIPFA Code requires the Authority to include the following in its treasury management strategy.

**Financial derivatives:** Local authorities have previously made use of financial derivatives embedded into loans and investments both to reduce interest rate risk (e.g. interest rate collars and forward deals) and to reduce costs or increase income at the expense of greater risk (e.g. LOBO loans and callable deposits). The general power of competence in section 1 of the *Localism Act 2011* removes much of the uncertainty over local authorities' use of standalone financial derivatives (i.e., those that are not embedded into a loan or investment).

The Authority will only use standalone financial derivatives (such as swaps, forwards, futures and options) where they can be clearly demonstrated to reduce the overall level of the financial risks that the Authority is exposed to. Additional risks presented, such as credit exposure to derivative counterparties, will be taken into account when determining the overall level of risk. Embedded derivatives, including those present in pooled funds and forward starting transactions, will not be subject to this policy, although the risks they present will be managed in line with the overall treasury risk management strategy.

Financial derivative transactions may be arranged with any organisation that meets the approved investment criteria, assessed using the appropriate credit rating for derivative exposures. An allowance for credit risk calculated using the methodology in the Treasury Management Practices document will count against the counterparty credit limit and the relevant foreign country limit.

In line with the CIPFA Code, the Authority will seek external advice and will consider that advice before entering into financial derivatives to ensure that it fully understands the implications.

**Housing Revenue Account:** On 1<sup>st</sup> April 2012, the Authority notionally split each of its existing long-term loans into General Fund and HRA pools. In the future, new long-term loans borrowed will be assigned in their entirety to one pool or the other. Interest payable and other costs/income arising from long-term loans (e.g. premiums and discounts on early redemption) will be charged/credited to the respective revenue account. Differences between the value of the HRA loans pool and the HRA's underlying need to borrow (adjusted for HRA balance sheet resources available for investment) will result in a notional cash balance which may be positive or negative. This balance will be measured and interest apportioned between the General Fund and HRA. The basis of this apportionment is currently being reviewed.

**Markets in Financial Instruments Directive:** The Authority has opted up to professional client status with its providers of financial services, including [advisers, banks, brokers and

fund managers], allowing it access to a greater range of services but with the greater regulatory protections afforded to individuals and small companies. Given the size and range of the Authority's treasury management activities, the Corporate Director of Resources believes this to be the most appropriate status.

### **Financial Implications**

The budget for investment income for 2022/23 is £0.250m based on an assumed interest rate of 0.25%. The total budget for debt interest paid in 2022/23 is £13m based on existing loans at an average rate of 4.2% and new borrowing projections at 2.5%. If actual levels of investments and borrowing, or actual interest rates, differ from those forecasts, performance against budget will be correspondingly different. If actual levels of investments and borrowing, or actual interest rates, differ from forecast, performance against these interest cost and investment income budgets will be correspondingly different.

### **Other Options Considered**

The CIPFA Code does not prescribe any particular treasury management strategy for local authorities to adopt. The Corporate Director of Resources, having consulted the Executive Member for Finance and Performance, believes that the above strategy represents an appropriate balance between risk management and cost effectiveness. Some alternative strategies, with their financial and risk management implications, are listed below.

<b>Alternative</b>	<b>Impact on income and expenditure</b>	<b>Impact on risk management</b>
Invest in a narrower range of counterparties and/or for shorter times	Interest income will be lower	Lower chance of losses from credit related defaults, but any such losses may be greater
Invest in a wider range of counterparties and/or for longer times	Interest income will be higher	Increased risk of losses from credit related defaults, but any such losses may be smaller
Borrow additional sums at long-term fixed interest rates	Debt interest costs will rise; this is unlikely to be offset by higher investment income	Higher investment balance leading to a higher impact in the event of a default; however long-term interest costs may be more certain
Borrow short-term or variable loans instead of long-term fixed rates	Debt interest costs will initially be lower	Increases in debt interest costs will be broadly offset by rising investment income in the medium term, but long-term costs may be less certain
Reduce level of borrowing	Saving on debt interest is likely to exceed lost investment income	Reduced investment balance leading to a lower impact in the event of a default; however long-term interest costs may be less certain

### **List of Institutions Lent To & Approved Counterparty List – December 2021**

<b>Class</b>	<b>Type</b>	<b>Counterparty</b>	<b>Profile</b>	<b>Principal O/S (£)</b>
Deposit	Fixed	Surrey County Council	Maturity	-10,000,000.00
Deposit	Fixed	Slough Borough Council	Maturity	-10,000,000.00
Deposit	Fixed	Swale Borough Council	Maturity	-5,000,000.00
Deposit	Fixed	London Borough of Croydon	Maturity	-10,000,000.00
Deposit	Fixed	Conwy County Borough Council	Maturity	-11,000,000.00
Deposit	Fixed	Gloucester City Council	Maturity	-6,500,000.00
Deposit	Fixed	Windsor and Maidenhead Royal Borough Council	Maturity	-10,000,000.00
Deposit	Fixed	London Borough of Croydon	Maturity	-5,000,000.00
Deposit	Fixed	Thurrock Borough Council	Maturity	-15,000,000.00
Deposit	Fixed	Slough Borough Council	Maturity	-3,000,000.00
Deposit	Fixed	Windsor and Maidenhead Royal Borough Council	Maturity	-5,000,000.00
Deposit	Fixed	North Lanarkshire Council	Maturity	-10,000,000.00
Deposit	Fixed	London Borough of Haringey	Maturity	-5,000,000.00
Deposit	Fixed	Liverpool City Council	Maturity	-10,000,000.00
Deposit	Fixed	Police & Crime Commissioner for Merseyside	Maturity	-10,000,000.00
Deposit	Fixed	DMADF (Debt Management Account Deposit Facility)	Maturity	-15,000,000.00
Deposit	Fixed	DMADF (Debt Management Account Deposit Facility)	Maturity	-10,000,000.00
<b>Grand Total</b>				<b>-150,500,000.00</b>

**Approved Counter-Party List**

Minimum criteria	A+	F1	A1	P-1	A+	A-1							
	Fitch L/T	Fitch S/T	Moody's L/T	Moody's S/T	S & P L/T	S & P S/T	Sovereign Rating - F/M/S&P	Maximum Limit - £	Maximum Term	LBI	Arlingclose Current Advice	Lending at 31/12/2021	
<b>UK Banks</b>													
Barclays	A+	F1	A1	P-1	A	A-1	AA-/Aa3/AAu	15,000,000	100 days	Council Bankers from Mar 2015 - overnight liquidity only	Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
Handelsbanken plc	AA	F1+	NR	NR	AA-	A-1+	AA+/+Aa2/AA-	15,000,000	100 days	Limit to 3 Months	Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
HSBC	AA-	F1+	A1	P-1	A+	A-1	AA-/Aa3/AAu	15,000,000	100 days	Limit to 3 Months	Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
Lloyds Bank PLC / Bank of Scotland	A+	F1	A1	P-1	A+	A-1	AA-/Aa3/AAu	15,000,000	100 days	Limit to 3 Months	Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
RBS / NATWEST PLC	A+	F1	A1	P-1	A	A-1	AA-/Aa3/AAu	15,000,000	100 days	Limit to 3 Months	Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
Santander UK	A+	F1	A1	P-1	A	A-1	AA-/Aa3/AAu	15,000,000	100 days	Limit to 3 Months	Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
Standard Chartered	A+	F1	A1	P-1	A+	A-1	AA-/Aa3/AAu	15,000,000	100 days	Limit to 3 Months	Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
<b>UK Building Societies</b>													
Coventry	A	F1	A2	P-1			AA-/Aa3/AAu	NONE			Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
Leeds	A	F1	A3	P-2			AA-/Aa3/AAu	NONE			Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
Nationwide	A+	F1	A1	P-1	A-1	A+	AA-/Aa3/AAu	10,000,000	100 days	Limit to 3 Months	Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
Yorkshire	A	F1	A3	P-2	NR	NR	AA-/Aa3/AAu	NONE			Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
<b>Non UK Banks</b>													
<b>Australia</b>													
Australia & NZ Banking Group	A+	F1	Aa3	P-1	AA-	A-1+	AAA/Aaa/AAA	10,000,000	100 days	Limit to 3 Months	Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
Commonwealth Bank of Australia	A+	F1	Aa3	P-1	AA-	A-1+	AAA/Aaa/AAA	10,000,000	100 days	Limit to 3 Months	Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
National Australia Bank	A+	F1	Aa3	P-1	AA-	A-1+	AAA/Aaa/AAA	10,000,000	100 days	Limit to 3 Months	Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
Westpac Banking Corporation	A+	F1	Aa3	P-1	AA-	A-1+	AAA/Aaa/AAA	10,000,000	100 days	Limit to 3 Months	Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
<b>Canada</b>													
Bank of Montreal	AA	F1+	Aa2	P-1	A+	A-1+	AA+/Aa1/AA+	10,000,000	100 days	Limit to 3 Months	Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
Bank of Nova Scotia	AA	F1+	Aa2	P-1	A+	A-1	AA+/Aa1/AA+	10,000,000	100 days	Limit to 3 Months	Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
Canadian Imperial Bank of Commerce	AA	F1+	Aa2	P-1	A+	A-1	AA+/Aa1/AA+	10,000,000	100 days	Limit to 3 Months	Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
Royal Bank of Canada	AA+	F1+	Aa2	P-1	AA-	A-1+	AA+/Aa1/AA+	10,000,000	100 days	Limit to 3 Months	Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
Toronto-Dominion Bank	AA	F1+	Aaf1	P-1	AA-	A-1+	AA+/Aa1/AA+	10,000,000	100 days	Limit to 3 Months	Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
<b>Finland</b>													
Nordea Bank ABP	AA	F1+	Aa3	P-1	AA-	A-1+	AA+/Aa1/AA+	10,000,000	100 days	Limit to 3 Months	Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
<b>Germany</b>													
DZ BANK AG DEUTSCHE ZENTRAL-LANDESBANK BADEN-WUERTTEMBERG	AA-	F1+	Aa2	P-1	A+	A-1	AAA/Aaa/AAu	10,000,000	100 days	Limit to 3 Months	Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
<b>Netherlands</b>													
Cooperative Rabobank	AA-	F1+	Aa2	P-1	A+	A-1	AAA/Aaa/AAA	10,000,000	100 days	Limit to 3 Months	Limit to 100 days / %5 Deposits & CDs/ 10% Secured		
<b>Other</b>													
UK Local Authorities (except for SLOUGH BOROUGH COUNCIL)							AA-/Aa3/AAu	15,000,000(per au	24 Months		Limit to 24 Months - WEF 11/12/2018	125,500,000	
Supra-National Bonds ( EIB )	AA+	F1+	Aa1	P-1	AAA	A-1+	N/A	Unlimited	6 Months		Limit to 25 years 10% of portfolio -		
Transport For London	A+	F1+	A3	P-2	A+	A-1	AA-/Aa3/AAu	15,000,000	24 Months		Up to 24 months - Limit 10% of portfolio (Approx £15m)		
UK DMADF	NR	NR	NR	NR	NR	NR	AA-/Aa3/AAu	Unlimited	6 Months		Unlimited	25,000,000	
LCR Finance PLC	AA-	NR	Aa3	NR	AA	NR	AA-/Aa3/AAu	15,000,000	10 years		OK - Limit to 10% of Fund Size (approx £ 15M)		
Network Rail Infrastructure Finance PLC	AA-	NR	Aa3	P-1	AA	NR	AA-/Aa3/AAu	15,000,000	10 years		OK - Limit to 10% of Fund Size (approx £ 15M)		
UK Government	AA-	NR	Aa3	NR	Aau	A-1+u	AA-/Aa3/AAu	Unlimited	50 years		Unlimited		
Wellcome Trust Finance PLC	NR	NR	Aaa	NR	AAA	NR	AA-/Aa3/AAu	10,000,000	20 years		OK - Limit to 5% of Fund Size (approx £10M)		
<b>TOTAL FUNDS INVESTED</b>												<b>150,500,000</b>	

\* indicates ratings on watch or under review



## **Appendix F: CIPFA Financial Management Code**

### **Initial Compliance Assessment – Islington Council**

#### **Objectives and Principles**

The CIPFA Financial Management Code (CIPFA FM Code) is designed to support good practice in financial management and to assist local authorities in demonstrating their financial sustainability. The CIPFA FM Code sets a standard of financial management for local authorities.

The Code is based on a series of principles supported by specific standards and statements of practice to provide the strong foundation to:

- Financially manage the short, medium and long-term finances;
- manage financial resilience to meet foreseen demands on services; and
- financially manage unexpected shocks in their financial circumstances.

Each local authority must demonstrate that the requirements of the Code are being satisfied. Demonstrating this compliance with the CIPFA FM Code is a collective responsibility of elected members, the Chief Finance Officer and professional colleagues in the leadership team.

The CIPFA FM Code applies a principle-based approach. It does not prescribe the financial management processes that local authorities should adopt. Instead, the Code requires that a local authority demonstrate that its processes satisfy the principles of good financial management for an authority of its size, responsibilities and circumstances. Good financial management is proportionate to the risks to the authority's financial sustainability posed by the twin pressures of scarce resources and the rising demands on services.

The principles focus on an approach which will assist in determining whether, in applying standards of financial management an authority is financially sustainable:

- Organisational **leadership** - demonstrating a clear strategic direction based on a vision in which financial management is embedded into culture
- **Accountability** - based on medium term financial planning which drives the annual budget process supported by effective risk management, quality supporting data and whole life costs
- Financial management is undertaken with **transparency** at its core using consistent, meaningful and understandable data, reported frequently with evidence of periodic officer action and elected member decision making
- Adherence to professional **standards** is promoted by the leadership team and is evidenced.
- Sources of **assurance** are recognised as an effective tool mainstreamed into financial management and includes political scrutiny and the results of both external audit, internal audit and inspection.
- The long-term **sustainability** of local services is at the heart of all financial management process and is evidenced by prudent use of public resources.

## Initial Assessment of Compliance with Statements of Standard Practice

	Section/Financial Management Standard/Statement of Standard Practice	Level of Compliance (H/M/L)	Current Treatment	Further Action (if required)
	<b>Section 1 The Responsibilities of the Chief Finance Officer</b>			
<b>A</b>	<b>The leadership team demonstrates that the services provided by the authority provide value for money.</b>	H	Compliance is demonstrated by the application of other Standards and Statements in the FM Code	
<b>B</b>	<b>The authority complies with the CIPFA Statement on the Role of the Chief Finance Officer in Local Government</b>			
B1	The Chief Finance Officer in a public service organisation is a key member of the leadership team, helping it to develop and implement strategy and to resource and deliver the organisation's strategic objectives sustainably and in the public interest.	H	The Corporate Director of Resources (CDR, S151) is a key member of the Corporate Management Board.	Keep under constant review and seek continuous improvements to processes and practice.
B2	The Chief Finance Officer must be actively involved in, and able to bring influence to bear on, all material business decisions to ensure immediate and longer-term implications, opportunities and risks are fully considered, and alignment with the organisation's financial strategy.	H	All key and material financial decisions that require the approval of senior officers or Members must have first been considered by the CDR.	Keep under constant review and seek continuous improvements to processes and practice.
B3	The Chief Finance Officer must lead the promotion and delivery by the whole organisation of good financial management so that public money is safeguarded at all times and used appropriately, economically, efficiently and effectively. The Chief Finance Officer should regularly review the skill set of elected	H	Good financial management is promoted throughout the Authority through regular communication.	Keep under constant review and seek continuous improvements to processes and practice.

	Section/Financial Management Standard/Statement of Standard Practice	Level of Compliance (H/M/L)	Current Treatment	Further Action (if required)
	members and all officers with budget/financial management responsibility and ensure appropriate support is provided.		All managers with budgetary responsibility receive financial training from Heads of Finance and there are regular Member training sessions/briefings.	
B4	<p>The Chief Finance Officer must lead and direct a finance function that is resourced to be fit for purpose.</p> <p>The Chief Finance Officer should regularly review the skillset of all finance staff with senior budget/financial management responsibility and ensure ongoing appropriate support is provided.</p> <p>The ratio of qualified staff as a proportion of total finance staff ensures that the finance function has the necessary financial competence.</p>	M	<p>The Finance function is fit for purpose. A finance restructure is being undertaken at present. A training needs analysis is undertaken annually. The professional team are either qualified or actively studying for a qualification.</p>	Finance restructure to be finalised and implemented by 2022/23.
B5	<p>The Chief Finance Officer must be professionally qualified and suitably experienced.</p> <p>The Chief Finance Officer must be able to demonstrate adherence to professional CPD requirements on an annual basis.</p>	H	<p>The CDR is CCAB qualified with extensive experience in local government finance. CPD is demonstrated as part of CCAB membership obligations.</p>	

	Section/Financial Management Standard/Statement of Standard Practice	Level of Compliance (H/M/L)	Current Treatment	Further Action (if required)
B6	The Chief Finance Officer should promote the highest standards of ethical behaviour in the conduct of financial management. Professionally qualified staff should evidence an ongoing commitment to the principles of objectivity, integrity professional behaviour, professional competence, due care and confidentiality.	H	Professionally qualified staff are required to adhere to the ethical standards of their professional bodies. Finance staff are also bound by ethical requirements in their Job Description and those within the Council's code of conduct.	
B7	To enable financially informed decision making: The Chief Finance Officer should be able to provide the leadership team with sound advice on the key principles of local government finance; and The Chief Finance Officer should be able to demonstrate a sound system which ensures the authority has access to high standards of technical financial advice.	H	The CDR is an integral part of the leadership team and provides sound advice as part of this role. The authority employs a capable and experienced workforce and also has access to technical advice through external experts for funding, taxation, audit and pensions, as well as many forums to discuss London and national issues.	
B8	The chief finance officer should report explicitly on the affordability and risk associated with the capital strategy and where appropriate have access to specialised advice to enable them to reach their conclusions.	H	The affordability of the capital strategy is an integral part of the budget and MTFS.	
B9	The chief finance officer must establish the reporting and monitoring processes and integrate the treasury management indicators into the overall financial planning process.	H	There is an established process for reporting and monitoring. Treasury Indicators are	

	Section/Financial Management Standard/Statement of Standard Practice	Level of Compliance (H/M/L)	Current Treatment	Further Action (if required)
			approved within the budget papers each year.	
B10	The Chief Finance Officer of Local Government Pension Scheme (LGPS) administering authorities satisfies the requirements of the CIPFA Code of Practice on Public Sector Pensions Finance Knowledge and Skills (2013 edition).	H	Fully complies. This organisation recognises the importance of ensuring that it has the necessary resources to discharge its pensions administration responsibilities and that all staff and Members charged with financial administration, governance and decision-making with regard to the pension scheme are fully equipped with the knowledge and skills to discharge the duties and responsibilities allocated to them.	
	<b>Section 2 Governance and Management Style</b>			

	Section/Financial Management Standard/Statement of Standard Practice	Level of Compliance (H/M/L)	Current Treatment	Further Action (if required)
<b>C</b>	<b>The leadership team demonstrates in its actions and behaviours responsibility for governance and internal control.</b>	H	CMB have hosted sessions on good financial management. An organisation wide internal controls board was established and internal controls are tested annually as part of the work of Internal Audit.	
<b>D</b>	<b>The authority applies the CIPFA/SOLACE Delivering Good Governance in Local Government: Framework(2016)</b>			
D1	The authority maintains an effective audit committee.	H	The Audit Committee meets at regular stages throughout the financial year. It has two knowledgeable and experienced independent members.	
D2	The audit committee receives and monitors the implementation of internal and external audit recommendations. When threats to the financial sustainability of the authority are identified by auditors the audit committee should ensure that the recommendations are communicated to the leadership team and that the committee are informed of the effectiveness of the leadership team's response.	M	The audit committee receives details of all recommendations made by External Audit. The Committee receive an overview of assurance of all internal audit reports and the implementation progress of those.	A practice of referring all financial sustainability related recommendations to management and the consideration of their response will be put in place.
D3	The authority has a PSIAS conformant internal audit function	H	Fully complies.	The implementation of any recommendations from the External Quality Assessment (EQA)

	Section/Financial Management Standard/Statement of Standard Practice	Level of Compliance (H/M/L)	Current Treatment	Further Action (if required)
<b>E</b>	<b>The Financial Management Style of the authority supports financial sustainability</b>			
E1	The organisation has an effective framework of financial accountability that is clearly understood and applied throughout, from the political leaders, elected members to directors, finance officers and front-line service managers.	H	Financial Regulations and Instructions provide a clear and understandable framework for financial accountability.	
E2	Finance teams and the organisation they support are actively committed to continuous improvement focused on efficient and effective delivery and organisational performance.	M	Finance act as effective business partners, working closely with budget managers and Corporate Directors. This will be strengthened in new finance structure.	Await implementation of new finance structure to strengthen key areas including business partnering.
E3	Enabling transformation: the finance team have input into strategic and operational plans taking into account pro-active risk management, clear strategic directions and focus-based outcomes	H	Finance act as effective business partners, working closely with budget managers and Corporate Directors. Transformation and finance are aligned and within finance structure. The transformation process is established within the budget process.	

	Section/Financial Management Standard/Statement of Standard Practice	Level of Compliance (H/M/L)	Current Treatment	Further Action (if required)
E4	Managers understand they are responsible for delivering services cost effectively and are held accountable for doing so. Financial literacy is diffused throughout the organisation so that decision takers understand and manage the financial implications of their decisions.	H	Budgets and financial cash limits are clearly delegated to cost centre managers. Business partners and budget holders ensure implications of decisions are understood and that departments /managers are responsible for those decisions.	
E5	The financial management of the authority has been critically evaluated	H	Internal Audit reviews core financial controls and systems on a cyclical basis.	
	<b>Section 3: Long to Medium Term Financial Management</b>			
<b>F</b>	<b>The authority has carried out a credible and transparent Financial Resilience Assessment.</b>			
F1	Financial resilience is tested against best and worst case scenarios which cover a wide range of financial demographic and social challenges.	M	Financial resilience is tested against key risk scenarios when planning the MTFS.	Strengthen the budget setting process with the inclusion of scenario planning and sensitivity analysis.
F2	The authority uses independent objective quantitative measures to assess the risks to its financial sustainability.	H	Key quantitative measures are used to assess financial stability and risks. For example, analysing the level of general fund balances and reserves.	

	Section/Financial Management Standard/Statement of Standard Practice	Level of Compliance (H/M/L)	Current Treatment	Further Action (if required)
F3	Decision making by the authority demonstrates a sound understanding of the risks associated with its strategic business partners.	M	Key partners are evaluated before entry into formal arrangements.	Potential to review and strengthen especially since the impact of the pandemic on partners.
<b>G</b>	<b>The authority has a Long-Term Financial Strategy for financial sustainability.</b>	H	Fully embedded within the rolling MTFS and long-term capital programme.	
<b>H</b>	<b>The authority has a capital strategy aligned to its long term financial strategy</b>			
H1	The authority has an asset management plan that reviews the condition, sufficiency and suitability of assets in the light of business needs, and ambitions of the Medium - Long Term Financial Strategy.  The plan should evidence rigorous assessment of asset portfolio in relation to service delivery.	H	The Council operates a corporate landlord model and is constantly evaluating the best use of its assets. A condition survey is carried out on a regular basis by external consultants, which provides a total cost and prioritisation to inform the capital programme and strategy.	
H2	The authority maintains processes to ensure that information about key assets and liabilities in its balance sheet is a sound and current platform for management action.	H	Information regarding whole-life cost of assets is maintained within the financial system and accounts.	
<b>I</b>	<b>The authority complies with the CIPFA Prudential Code</b>	H	Compliance is reported annually within the budget report. The Council is compliant.	

	Section/Financial Management Standard/Statement of Standard Practice	Level of Compliance (H/M/L)	Current Treatment	Further Action (if required)
<b>J</b>	<b>The authority has a rolling multi-year Medium Term Financial Plan</b>	H	The MTFS is approved and updated annually within the budget report for a 3 year period.	
<b>K</b>	<b>The authority has sustainable service plans that are consistent with its long-term financial strategy and the medium term financial plan.</b>			
K1	The Medium-Term Financial Plan should make reference to other organisational plans (e.g. workforce planning) and performance measures to demonstrate an alignment between service and financial planning.	M	Whilst other plans (e.g., workforce planning) are central to the MTFS, this link isn't explicit in published documents.	Explicit and written linking of the MTFS to all key organisational plans is recommended going forward.
K2	The authority has benchmarked the performance of its services against appropriate comparators.	H	The Authority uses CIPFA and other benchmarking services to analyse financial and service performance.	
K3	To inform the Leadership Team's decisions the authority has a single document tracking progress in the delivery of planned savings over the period of the Medium-Term Financial Plan.	H	A savings tracker is maintained and monitored regularly as part of in-year budget monitoring with ongoing implications picked up in the rolling MTFS.	
K4	The authority publishes its plans for the use of reserves over the period of the Medium-Term Financial Plan The level of reserves at 31st March in any one year should not be fall below the level previously agreed. The authority should demonstrate adherence to the most recent guidance on reserves from CIPFA's Local Authority Accounting Panel	H	The Authority has an approved Reserves document that details plans for reserves over the period of the rolling MTFS - compliant with CIPFA guidance.	

	Section/Financial Management Standard/Statement of Standard Practice	Level of Compliance (H/M/L)	Current Treatment	Further Action (if required)
	<b>Section 4: The Annual Budget</b>			
<b>L</b>	<b>The authority complies with its statutory obligations in respect of the budget setting process</b>	H	All statutory obligations are fulfilled within the annual budget report.	
<b>M</b>	<b>The budget report includes an assessment of its consistency with the current medium term financial plan and long-term financial strategy.</b>			
M1	The annual report proposing the budget includes an analysis of the success/failures in achieving the spending plans of the previous year and of departures from the planned use of reserves and balances.	M	This is monitored and reported on an ongoing basis with reporting picked up in the budget report as appropriate where it relates to the rolling MTFS. The budget report addresses the long term impact of in year variances.	The budget monitoring process will be strengthened going forward to include the longer term impact of in year variances.
<b>N</b>	<b>The budget report includes a statement by the Chief Finance Officer on the robustness of the estimates and a statement of the adequacy of the proposed financial reserves.</b>	H	This is included within the annual budget report.	
	<b>Section 5: Stakeholder Engagement and Businesses Cases</b>			

	Section/Financial Management Standard/Statement of Standard Practice	Level of Compliance (H/M/L)	Current Treatment	Further Action (if required)
<b>O</b>	<b>The authority has engaged with key stakeholders in developing its long-term financial strategy, medium-term financial plan and annual budget.</b>	H	The annual budget report and rolling MTFS is subject to full consultation including with key stakeholders (e.g., Council Management Board, political leadership and the business community).	
<b>P</b>	<b>The authority uses a documented option appraisal methodology to demonstrate the VFM of its decisions</b>			
P1	Option appraisal complies with IFAC/PAIB Project and Investment Appraisal for Sustainable Value Creation: Principles in Project and Investment Appraisal (Annex B to CIPFA FM Code)	M	Option appraisal complies with the principles, but this is not formally documented.	Ensure process makes explicit reference to these principles.

	Section/Financial Management Standard/Statement of Standard Practice	Level of Compliance (H/M/L)	Current Treatment	Further Action (if required)
P2	The accounting treatment of material decisions is considered and demonstrated as part of the formal option appraisal process.	H	The accounting treatment and impact is determined and documented within formal financial implications.	
Q	<b>The authority applies the principles contained in the CIPFA Service Reporting Code of Practice and utilises appropriate costing techniques in the development of business cases</b>	H	SeRCOP principles are utilised consistently.	
	<b>Section 6: Performance Monitoring</b>			
R	<b>The authority takes action using reports enabling it to identify and correct emerging risks to its budget strategy and financial sustainability.</b>			
R1	Timely time financial and performance information is available to managers via the appropriate systems. The systems are engineered to provide relevant data at a sufficiently accurate level. The organisation ensures that information is appropriately tailored and streamlined to avoid the risk of 'data overload'.	H	Managers are able to access information on demand. Reports have been developed with budget holders to provide them with the correct level of information.	
R2	All Financial monitoring reports include: <ul style="list-style-type: none"> <li>• The name of the budget holder responsible for the information presented</li> <li>• Accruals based financial information</li> <li>• Include the approved budget against which monitoring is taking place.</li> <li>• A forecast for the remainder of the budget period,</li> <li>• Service performance information and</li> </ul>	M	Complies with the exception of an exhaustive level of performance information within monitoring reports.	A fuller analysis of performance information needs to be embedded within monitoring reports.

	Section/Financial Management Standard/Statement of Standard Practice	Level of Compliance (H/M/L)	Current Treatment	Further Action (if required)
	- is shown, for instance by reconciliations, to be consistent with the aggregate position for the authority.			
R3	<p>Financial monitoring reports for high risk budgets are:</p> <ul style="list-style-type: none"> <li>• Scrutinised by the leadership team of the organisation on (as a minimum) monthly basis.</li> </ul> <p>Financial monitoring reports for steady state/low risk budgets are:</p> <ul style="list-style-type: none"> <li>• Received by budget holders on a monthly basis</li> <li>• Received (in aggregate) by the leadership team on a regular basis (in aggregate) by the leadership team.</li> </ul>	H	Fully compliant.	
R4	The authority has arrangements which allow annual service budgets to be recalibrated in response to unforeseen developments.	H	In-year budget realignments can be approved in line with the council's financial regulations.	
R5	At the financial monitoring period end the leadership team receives a set of financial statements with forecast outturn for the year ahead	H	Fully compliant.	
R6	There are appropriate arrangements in place for reporting and managing the financial performance of each of the organisation's delivery partnerships and collaborative arrangements.	H	Yes, to the appropriate officer and Member meetings/bodies.	

	<b>Section/Financial Management Standard/Statement of Standard Practice</b>	<b>Level of Compliance (H/M/L)</b>	<b>Current Treatment</b>	<b>Further Action (if required)</b>
R7	There are appropriate arrangements in place for the project management and cost control of capital projects.	H	Capital projects and programme monitored on a monthly basis.	
<b>S</b>	<b>The authority monitors the elements of its balance sheet which pose a significant risk to its financial stability</b>			
S1	Unplanned and planned use of reserves are reported [quarterly] to the management team of the organisation and to Council.	H	Picked up on a regular basis as part of in-year budget monitoring.	
S2	Management accounts include either a full balance sheet or an appropriate level of balance sheet information to meet business needs and evidence of monitoring of material items	H	Yes – where appropriate.	
	<b>Section 7 External Financial Reporting</b>			
<b>T</b>	<b>The Chief Finance Officer has personal responsibility for ensuring that the statutory accounts provided to the local authority comply with the Code of Practice on Local Authority Accounting in the United Kingdom.</b>	H	The annual accounts are reviewed and signed by the CDR.	
<b>U</b>	<b>The presentation of the final outturn figures and variations from budget allow the leadership team to make strategic financial decisions.</b>	H	An annual report is presented that informs strategic decision making.	



# **Appendix G: Budget 2022/23 Cumulative Equalities Impact Assessment**

## **1. Purpose of Report**

This report assesses the equalities impacts of the savings proposals set out in the Council's Budget for 2022/23.

It provides an assessment of the likely impacts of the budget savings on residents and employees with 'protected characteristics' as defined by the Equality Act 2010. It also considers the impacts on those who could be considered at a disadvantage in accessing opportunities or services (such as people with language difficulties or from low-income households), which is also a consideration in Islington's Equalities Impact Assessment process.

The report assesses the overall impacts of the suite of savings proposals (cumulative impact) set out in the 2022/23 budget on residents and staff. It also provides a more detailed review – by specific groups and by directorate – of the cumulative impacts of existing savings set out last year, and in this new budget, on specific groups, and the actions to reduce or mitigate these impacts.

## **2. Context**

### Our commitment to fairness and equality

The Council's vision is to create a more equal Islington – to create a place where everyone, whatever their background, has the opportunity to reach their potential and enjoy a good quality of life.

Challenging inequality, racism and injustice is mission critical for Islington. We cannot realise our vision of creating an equal borough for all our residents without tackling the inequality that continues to hold back some communities. Our new 'Challenging Inequality Programme' sets out our long-term ambition for challenging inequality, inequity, racism and promoting inclusion. We are determined to improve life chances for our residents and staff; ensuring no one is disadvantaged.

We want to challenge inequality in every capacity available to us, taking advantage of our position as an employer, strategic leader and as a service provider/ commissioner.

### Our Equality Impact Assessment Process

Equality impact assessments (EQIAs) are an important part of ensuring our services are responsive to the needs of our diverse communities and help tackle inequality, creating a fairer borough for all.

In Autumn 2021, the equalities team introduced a new EQIA process to improve efficiency and quality assurance. Each of the savings proposals set out in this budget has been

considered through an equalities lens, with initial screening of all completed via our new EQIA Screening Tool. Where the screening tool identified significant potential (or perceived) negative or positive impacts, a full Equalities Impact Assessment was completed in order to mitigate any risks or spread potential benefits. The Equalities Team was closely involved in all aspects of this process, working with services to identify potential or perceived impacts.

These individual assessments have been used to inform this overall assessment of the impacts of our budget savings proposals on residents and staff and, in particular, on any specific group.

### Our priorities

Over the next decade, we will maintain a relentless focus on tackling inequality and eradicating poverty in our borough. To bring this vision to life, we have developed five clear priorities:

**Nurturing Our Children and Young People:** ensuring that every young person in Islington has access to the opportunities they need to thrive in life, including an excellent education.

**Place to Call Home:** using our power and influence to stand up for private renters and all others in our communities to ensure equity in access to decent, safe and affordable homes.

**Standing with Our Communities:** fostering a place made up of strong communities, where – regardless of background – people feel safe, connected and have the resources they need to make change in their local areas.

**Investing in Local:** addressing precarious employment and ensuring equal access to well-paid jobs with prospects. This has been exacerbated by the pandemic, with the night-time economy and sectors such as leisure and hospitality hit hardest in the borough, which means creating local opportunities is more important than ever.

**Cleaner, Greener, Healthier:** seizing opportunities to create a sustainable future where people can live independent and healthy lives, while enjoying clean air and people-friendly streets.

### Our legal duties

Under Section 149 of the Equality Act 2010, the Council has a legal duty to have “due regard” to the need to:

- eliminate unlawful discrimination, harassment and victimisation
- advance equality of opportunity and
- foster good relations between different groups.

The precise wording of the Public Sector Equality Duty (PSED), together with a list of the ‘protected characteristics’ defined in the Act, is set out at Annex A.

We are required to demonstrate fulfilment of our duty to pay ‘due regard’ in the decision-making process and, as such, we need to understand the effect our policies and practices

have on equality. Although the Council is not legally obligated to reject savings or growth proposals that could have negative impacts on any particular groups, it must carefully and with rigour consider the impact of its proposals on the PSED, take a reasonable and proportionate view about the overall impact on particular groups, and seek to mitigate negative impacts where possible.

In addition, at Islington we go beyond our legal duties to consider impacts on those who could be at a disadvantage in accessing opportunities or services. This includes people from low-income households, carers, migrants, refugees and people with No Recourse to Public Funds (NRPF), and those with low literacy levels.

### Our diverse population

Islington is an Inner London borough with a diverse population. Data from our 2021 [State of Equalities](#) report paints a profile of Islington as a place alongside our diverse communities:

- **Population:** The population of Islington is estimated to be 244, 372 in 2021. This is an increase of approximately 18% (37, 733 people) since 2011. It is estimated that our population will grow by a further 3% (6,500 people) over the next 10 years. Islington is the most densely populated local authority area in England and Wales, with 16,321 people per square km. This is almost triple the London average and more than 37 times the national average.
- **Age:** Islington has a relatively young population with 38,000 people aged under 18. Of the 176,600 people aged 25-34, 62,900 are aged 25-34. 9% of the population is aged over 65, compared with an average of 12% in London and 19% in England.
- **Ethnicity:** Islington is a diverse borough, with Black, Asian or Minority Ethnic groups accounting for 32% of our population. Children growing up in Black, Asian or Minority Ethnic households in Islington are more likely to be living in poverty in comparison to white children. From February 2020 - December 2020, the rate of stop and searches of people of Black ethnicity in Islington was four times higher than the rate of stop and searches of people of White ethnicity and more than double people of Asian ethnicity.
- **Sex:** The proportion of men and women in the borough is roughly 50/50. However, there are variations in life expectancy between men and women. Life expectancy at birth for men in Islington is 79.7 years, whilst women in Islington have a longer life expectancy of 83.4 years

93% of lone parents with dependent children are female. This is significant because unemployment rates among lone parents are far higher than the wider population - this is likely to affect household income and therefore deprivation levels. In Islington 56% of lone parents are not in employment while just 21% are in full-time employment – half the figure for the wider population.

- **Disability:** In May 2020, there were 5,332 Disability Living Allowance claimants in Islington. The estimated number of Islington residents with a disability in 2020 is 36,656, or 15% of the population. There are 3,886 people in Islington living with a serious mental illness, the highest prevalence of serious mental illness in London.

National research has demonstrated that disabled jobseekers need to apply for 60% more jobs than their non-disabled counterparts. Nationally, across all ages and both sexes, the prevalence of disability is higher among those living in the most deprived areas of the country compared to the least deprived areas of the country.

- **Socio-economic:** Islington is the most deprived borough in London for income deprivation affecting children, and fourth highest for income deprivation affecting older people. Poverty is an issue in every part of the borough: almost every ward includes one of the most deprived LSOAs in Islington. Finsbury Park is the most deprived ward. As mentioned above, children in Black and Minority Ethnic households or in lone parent households, and households with a disabled person, are more likely to be living in poverty.
- **Housing:** Islington has a relatively high proportion of social housing. Those in social housing are more likely to be on low income, though increasingly we are seeing households in the private rented sector struggling. Both social and private sector tenants who have moved to Universal Credit have seen increased levels of debt, which may put their tenancies at risk.

### The impact of COVID-19

We know that COVID-19 has had a disproportionate impact on many disadvantaged groups. COVID-19 has affected residents in many ways including affecting mental health, employment, health and education. Our research supports findings nationally that certain groups are more likely to have been disproportionately impacted by COVID-19 – this includes Black, Asian and Minority Ethnic communities, the elderly, young people (particularly those living in large households), and people with mental health conditions. Over the course of the pandemic, there has been a significant increase in mental health diagnoses, with a predicted further 20% rise in moderate-severe anxiety and depression in adults. The number of primary school children in LBI in receipt of free school meals rose by 6% and the number of households claiming Universal Credit has nearly doubled for people from White Other, Other or Asian ethnic groups. There has also been a 55% increase in domestic abuse cases, which has predominately affected women.

However, since the last consolidated EQIA there has also been a significant rollout of the vaccine. Up to 1 December 2021, 159,850 of Islington residents have had at least their first vaccine. 81% of the population aged 50 and over have had at least one vaccination. We have also been supporting residents to access employment support and provide support on applying for appropriate benefits. In November 2021, we also launched Let's Talk Islington to fully comprehend the scale of inequality in Islington and collaborate with residents to co-design a new era of public service delivery.

COVID-19 has also highlighted issues around digital inclusion (exclusion). Over the years an increasing number of services have moved online but COVID-19 has turbo-charged this trend, necessitating the move to more virtual methods of service delivery in order to continue to support residents. This presents a risk for some residents who may not be able to access services online and therefore risk becoming socially isolated. The reasons for this may include a lack of digital skills / confidence to use digital channels, communication challenges e.g. language and literacy barriers, physical or learning disability and affordability issues (digital poverty). Services are encouraged to be mindful of this.

The proposals in this report do not directly impact or amplify the issues identified around digital exclusion. Where consultation is required on proposals, service leads will ensure that a variety of methods engage residents to ensure we reach those that would otherwise be excluded.

In addition, we have been mindful of pandemic's significant negative economic impact, particularly in its impact on the poorest in our society. The cost of living is also rising, with figures in November 2021 demonstrating the highest rate of inflation in 10 years. We have been mindful of this within our budget setting; services have been especially encouraged to consider the impact of (and provide mitigation for) their proposal on those who are socio-economically deprived or disadvantaged.

### **3. Equalities Impacts: overall cumulative impact**

The overall assessment is that there is **no cumulative negative impact** as a result of the budget savings proposals for 2022/23.

The budget sets out 19 new proposed savings, which will deliver savings of £3.530m in 2022/23. This is in addition to £3.246m continuation of previously agreed savings.

The majority of the proposals to close the budget gap come from council tax and tariff fee rises or changes, service restructures, maximising funding streams and making better use of technology. These will result in 'back office' changes with small impacts on staff but with little or no impact on residents. However, the vast majority of these impacts were not deemed significant enough – or had robust enough mitigation in place to mitigate fully against any negative impacts – to progress to a full EQIA.

Only two of the new savings proposals submitted for 2022/23 required a full EQIA. However, of these, only one ('re-design and simplify the resident parking zone permit price-tariff') had significant negative impacts disproportionately affecting groups with protected characteristics. The other ('streamlining the daytime response services') proposes a small (two FTE) number of staff redundancies but neutralises its equalities impacts and does not disproportionately impact any particular group – this is therefore only included as a summary in section 5.

#### Impacts on all residents

The key proposal disproportionately affecting certain groups is to 're-design and simplify the resident parking zone permit price-tariff'. The proposal covered in this assessment is two-fold. Firstly, introduced from April, a 10% increase to current permit prices (rounded to the nearest £1) increasing permit income by £0.292m for the year introduced.

Secondly, there will be a complete review of the 14 price bands for Resident Parking Permits based upon CO2 emissions. Reducing the number of bands and grouping the current bands together will simplify the price tariff from 1st October 2022. This proposal only seeks to change resident permit bandings so would not affect wider groups such as carers, community groups, businesses etc. as these are covered under different parking schemes. The immediate impact as of April 2022 would be the increase of permit prices for all residents by 10%. The most recent permit data shows a possible impact on 35,205 permits.

The following is an example of a new tariff with 8 bands showing the estimated number of permits, current and proposed new price (note that there is an additional diesel surcharge for diesel vehicles):

Electric Vehicles (500 Permits): Current Price £25, Proposed New Price £25

CO2 Band 1-100 (2,820 Permits): Current Price £30, Proposed New Price £50

CO2 Band 101-120 (5,865 Permits): Current Price £35-40, Proposed New Price £75

CO2 Band 121-140 (5,920 Permits): Current Price £95-115, Proposed New Price £125

CO2 Band 141-165 (5,592 Permits): Current Price £125-150, Proposed New Price £175

CO2 Band 166-200 (4,148 Permits): Current Price £175-255, Proposed New Price £275

CO2 Band 201-255 (1,662 Permits): Current Price £295-415, Proposed New Price £475

CO2 Band 256+ (424 Permits): Current Price £535, Proposed New Price £575

The table below demonstrates the groups who may be disproportionately impacted, and the service's planned mitigations:

<b>Characteristic</b>	<b>Impact</b>	<b>Mitigation</b>
Age (older people)	Potential impact on those reliant on cars due to old age paying increased costs for resident parking permits	Elderly residents who are supported by carers can rely on doctor's permits and carers permits for those visiting them for health reasons.  There is no additional support that the parking services provides purely for old age; should disability lead to reduced mobility, the blue badge scheme is in place which entitles

		<p>residents to free resident parking permits.</p> <p>The 60 plus oyster card is available providing free transport on all TfL based services to elderly residents. The Freedom Pass provides the same access to transport services across London based on disability, including those who have a disability or injury that prevents them from walking.</p>
Disability	Potential impact on residents with a disability that may require more extensive use of a vehicle based on their mobility	Negative impacts are reduced via the blue badge scheme & the free resident permits which allow those who have a disability to park at no increased charge
Pregnancy and maternity	Potential impact on those reliant on cars due to pregnancy or early childcare paying increased costs for resident parking permits	New parent parking vouchers are available for residents with new children to access 40 hours of free parking
Socio-economic	There is a potential socio-economic impact for residents whose older less environmentally friendly vehicles being impacted by the environmental nature of the permit banding	<p>Specific guidance and provisions around managing money and the support the council provides to people struggling this way is available and will be directed to support residents who struggle with additional costs.</p> <p>Islington offers guidance and support on financial matters for residents including the resident support scheme, direction to independent financial advice and the money advice service as well as more bespoke financial support services such as the Shine Energy Advice service.  <a href="#">Money and debt advice   Islington Council</a></p>

There will be a full consultation for the fully remodelled permits banding; prior to the uplift that is being completed as part of the fees and charges process so will be issued via notice.

The service will continue to monitor the above impacts and screen for unexpected equalities impacts.

Of the proposals that did not progress to a full EQIA, there were potential impacts with mitigating action in place, on the following groups:

- Service users
- Residents
- Staff

However, as these impacts were not significant enough to progress to a full EQIA, they are outlined in **section 5** within the summary of all proposals.

#### Overall equalities impact assessment

Looking at the totality of the savings to be delivered in 2022/23, the impacts on Islington residents and staff are assessed as follows:

- There are no significant impacts on Islington residents as a whole – and where changes have been introduced around universal services and charges, vulnerable residents are not disproportionately impacted and those facing socio-economic disadvantage are protected from financial impacts and offered extra support.
- There are no significant impacts on staff – the number of redundancies from these proposals is low, mostly impacting agency staff, and there are no obvious impacts on specific protected characteristics.

The conclusion is that the Council’s proposals for achieving savings are therefore considered reasonable and have shown due regard to the PSED.

## **4. Equalities groups impacted by savings proposals**

This section looks in more detail at the impacts of specific proposals on protected characteristics and on socio-economic disadvantage. It includes proposals from this year’s budget and from the budget last year that have a potential equalities impact.

Based on individual Equalities Impact Assessments the following protected characteristics are potentially impacted by one or more of the savings proposals for 2022/23:

<b>Characteristic</b>	<b>Proposal</b>	<b>Directorate</b>
<b>Age (older people)</b>	<ul style="list-style-type: none"> <li>• Re-design and simplify the resident parking zone permit price-tariff</li> </ul>	Environment
<b>Disability</b>	<ul style="list-style-type: none"> <li>• Review of Floating Support Services (<i>previously agreed saving</i>)</li> <li>• Re-design and simplify the resident parking zone permit price-tariff</li> </ul>	Adult Social Care Environment
<b>Socio-Economic</b>	<ul style="list-style-type: none"> <li>• Re-design and simplify the resident parking zone permit price-tariff</li> </ul>	Environment

<b>Pregnancy/Maternity</b>	<ul style="list-style-type: none"> <li>• Re-design and simplify the resident parking zone permit price-tariff</li> </ul>	Environment
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There are no disproportionate impacts on the following protected characteristics:

- Age (younger people)
- Race
- Marriage and civil partnership
- Socio-economic disadvantage
- Sex
- Sexual orientation
- Religion or belief
- Gender reassignment

## 5. Savings proposals and impacts – by directorate

This section provides a detailed assessment by Directorate of those savings proposals – both new and existing - that will potentially impact specific groups. This includes proposals that necessitated full EQIAs as well as proposals that only necessitated completion of an EQIA screening tool – i.e. the proposal did not demonstrate a significant (negative or positive) equalities impact.

If services did not need to complete a full EQIA, they are advised to continually monitor their savings’ progress against the screening tool to check for unexpected equalities impacts and update where necessary.

### a) Council wide

The proposed increase to council tax, as outlined below, does not necessitate a full EQIA as the increase in real terms was very low and there is sufficient mitigation in place in the form of support for the most vulnerable. As the increase has a council-wide impact, it is necessary to evaluate despite not being classified as a savings option.

- Council tax increase

Excluding the GLA precept, the combined 2.99% increase in the basic Islington council tax equates to an increase of around 73 pence per week for full council taxpayers. Despite the proposed increase in council tax, working aged council tax support recipients living in a Band D property will pay around 82 pence per week less in 2022/23 due to the enhancement of the council tax support scheme

The increase will have a negligible socio-economic impact on residents. However, we will continue to support and protect the most vulnerable groups: foster carers are exempt from paying council tax, older people will continue to receive £100 discount, and families struggling on low incomes can apply for a significantly reduced rate through the enhanced Council Tax Support Scheme.

The total amount of council tax that Islington residents will have to pay will also be determined by the increase in the GLA precept to be confirmed by the Mayor of London. The council's Council Tax Support Scheme also applies to the GLA precept element of council tax.

## **b) Adult Social Care**

### *New savings:*

There were two proposals submitted with potential equalities impacts; neither necessitated a full EQIA. The proposals submitted related to:

- Expanding the Shared Lives provision

An alternative to traditional types of support where a person lives, or stays, with a Shared Lives carer within their local community. Cultural competency support is available for carers, along with a matching service that can match carers based on understanding of religious, ethnic or cultural background and sexual or gender identity. No significant negative equalities impacts are expected.

- Joint Funded Packages

A proposal to agree a process for joint funding arrangements for care packages between LBI and the CCG. There will be no impact on service-users or staff and there are no expected equalities impacts.

### *Previously agreed Savings*

There were three approved saving proposals, which identified potential impacts on protected characteristics. Below is a brief update on the project's progress (and associated equalities impacts) in the last year:

- "Low Support" Housing Related Support Recommissioning

The project completed in September 2021, resulting in the decommissioning of 118 units of supported housing accommodation. No unexpected equalities impacts arose. Although the residents accessing supported housing services are usually of a lower socio-economic status, residents in receipt of these services received support to remain in place without continued receipt of support, to move into alternative supported housing accommodation that could better meet their needs, or supported to move into either private rented or social housing.

An audit of affected residents' needs, co-produced with residents, at the beginning of this project, outlined the needs and preferences of each affected resident's preferred housing option. Commissioners worked closely with support providers, landlords and colleagues in Housing Needs to ensure that residents' needs and preferences a manner that was proportionate with their needs.

The housing options of affected residents included remaining in their current accommodation, with support from a housing provider either removed altogether or supplanted by floating support, depending on individual needs and preferences. Other options included supporting residents to move into social housing, or private rented sector housing. A small number of residents were rehoused into alternative supported housing that could better meet each applicable resident's needs.

Where residents moved into independent housing, each resident was supported to access the Resident Support Scheme for financial and practical support for their move. Successful and timely decommissioning of services resulting in re-designed pathways of supported housing.

- Review and Reduce the Floating Support Service

As of 7 December 2021, the project to manage the reduction of budget for the Floating Support contract is ongoing. There are no unexpected or adverse equalities impacts to report at the time of writing. There is close partnership working between Floating Support provider, commissioners, Housing colleagues and other providers of tenancy sustainment services to mitigate impacts of budget reduction.

The service review of Floating Support recommended a re-configuration of the service, which is currently in process.

There have been successful and timely budget reductions implemented up to time of writing and relationships developed by tenancy sustainment services. The Council and Floating Support in partnership are monitoring the risks to access due to the potential creation of a waiting list for the service.

- Review charging policy with a view to maximise income

The project for charging an administration fee for full cost social care service users has not gone ahead as of December 7 2021. After completing an initial EQIA, the service was advised not to take the project forward.

## **c) Children's Social Services**

### *New savings*

This year's budget sets out four savings proposals. The EQIA screening tools made the assessment that none had a significant enough negative or positive equalities impact to necessitate completion of a full EQIA, or had robust mitigation in place to offset any impacts. The proposals included:

- Deleting 3 PTE posts in Targeted Youth Support, to replace with 1 FTE post

No impact on service delivery but low negative impact on two PTE staff with union consultation in place. The PTE staff will be replaced with 1 FTE post so service provision will run as normal.

- Violence Against Women and Girls (VAWG) savings

Achieved by delaying the commissioning of and seeking alternative funding for two new projects (including an LGBTQ+ independent domestic violence advocate) and the decommissioning of two existing services. The decommissioned projects had very low uptake so is expected to have minimal impact on service users. Service users will continue to receive support through the Integrated Gangs Team and the Intimate Partner Violence Service. There is a low negative impact on LGBTQ+ survivors and young people as the targets and beneficiaries of the delayed and decommissioned services; mitigation action will ensure they are support by other parts of the service that have capacity. It is not expected that service-users will be disproportionately impacted, as they will be appropriately signposted and reassigned to other services and support.

- Review of management structure in Learning and Culture

The proposal to delete the vacant Head of Service post will deliver a £0.080m saving. The risks of removing the post are mitigated because functions have continued with no service impact whilst the post has remained vacant. No equalities impacts are expected.

- Reduction of £25k Local Authority contribution to Islington Safeguarding Children's Partnership (ISCP)

No impact on service delivery or on staff, as funding reductions reflect a consistent underspend in the ISCP budget.

#### *Previously agreed savings*

There were no previously agreed savings proposals with equalities impacts submitted.

## **d) Community Wealth Building**

### *New savings*

There were two savings proposals from Community Wealth Building, neither of which progressed to a full EQIA at the time of writing:

- Creation of a Corporate Landlord Service

Consolidation of a range of property and asset management activity in a unified service. Although three FTE posts will be lost through this restructure, staff are to be redeployed or absorbed into new roles. There is some impact on schools, through the planned ceasing of a free post-delivery, and consultation will take place with schools

to ensure a smooth transition. There are no expected equalities impacts, and whilst there are no planned redundancies, staff consultation will take place. This proposal did not necessitate a full EQIA.

- Procured spend savings: additional target using existing delivery approach

The Council is expected to deliver on its existing procured spend savings target and the associated opportunity pipeline supports delivery of an additional target. The existing savings delivery approach and governance will roll-on in support of this new savings target. Consistent with the existing savings target, this target will require Council-wide support from finance and commissioning managers to deliver the saving. It is important to retain the principle that the procured spend savings target has 'first call' on any reductions in third party spend. Residents, staff, visitors, businesses and service users are expected to be impacted – however, it was not possible to outline this at the time of writing because the spend target is an initiation stage. Consultation will occur initially internally on potential opportunities, and where specific groups are likely to be impacted by a change, the appropriate consideration of consultation will be given.

*Previously agreed savings*

There were no previously agreed savings proposals with equalities impacts submitted. This directorate did not exist prior to the 2021/22 financial year and therefore no previously agreed savings exist.

## **e) Environment**

*New savings:*

This year's budget for 2022/23 sets out nine savings proposals, two of which progressed to a full EQIA.

- Re-design and simplify the resident parking zone permit price-tariff (full EQIA completed)

See section 3 for details.

- Stream-lining of in-house compliance services (full EQIA completed)

In order to give coverage across day and night for enforcement, our compliance, street trading and out of hours Anti-Social Behaviour (ASB) teams have overlapping functions. The review of the customer journey for waste enforcement and street trading identified that there is excess capacity during the day when enforcement demands are lower. Therefore, the proposal is to streamline the daytime services by merging the compliance and street trading teams, a reduction in two FTEs across a staff group of 31. The proposal to streamline expects no adverse impacts on service delivery, due to the removal of duplication of activity and intelligence-led deployment, directed to those times of day when the service is in high demand. As the full service

will retain its response rates and service quality, the proposal is expected to not impact upon residents, businesses, other service users, or the customer journey.

The working practices within the council will not change for the staff group impacted by these changes. Although there will be two fewer staff, because the proposal addresses excess capacity during the day (when enforcement demands are lower), the stream-lining of daytime services across a staff group of 31 will not detrimentally impact on the workloads placed on staff groups, irrespective of their background or if they are from protected groups.

The proposal initially seeks voluntary redundancies but if this is unsuccessful, it will embark on a consultation process with the entire staff group, designed in conjunction with HR to ensure no bias. Therefore, considering the explanation and mitigation above, the savings proposal records no potential equalities impacts.

- Review of in-house compliance service

This proposal set out an initial intention to reduce the number of staff in the compliance team by two staff, with a full consultation with staff planned. The service is planning to complete a full EQIA after the consultation is complete and a saving decision made.

- Electronic Cars Parking Vouchers

Electronic parking vouchers currently comprise:

- Permission to Park vouchers - Scheme for trades people carrying out work in the borough (£28.50 per day)
- Visitor permits - Permits for resident's visitors to park (£14.50 per day).

The proposal is to introduce an additional daily surcharge on petrol vehicles (£2 surcharge) and diesel vehicles (£5 surcharge) vehicles, and to retain prices for electric vehicles (other than inflationary increase). This is in line with the charging approach already introduced in short stay parking.

- For Permission to Park vouchers, the daily rate would increase to £33.90 for diesel, £33.90 for petrol and remain at £28.90 for electric vehicles.
- For Visitor Vouchers, the daily rate would increase to £19.50 for diesel, £16.50 for petrol and £14.50 for electric vehicles. Visitor vouchers can be purchased on the basis 30 minute units.

All these permits and vouchers including the daily surcharge is pro-rata for shorter period of the day (half hour, hour etc.)

The proposal only covers visitor vouchers; residents parking in the borough would presumably have a resident permit. If driving somewhere in borough to access services and there was not parking provided as part of the service you would utilise on-street parking. Non-resident visitors accessing a service in Islington would utilise

an on-street parking provision rather than a visitor voucher. Staff would also not utilise a visitor voucher, there are local provisions for staff depending on their job requirements.

The proposal sets out the following mitigations to potential equalities impacts below:

- Carers: Carers have access to a carers permit and would not use a visitor voucher.
- Disability: Those who require a permit would have access to the concessionary rates. Additionally, no cost increases to concessionary rates which those receiving Incapacity Benefit or Disability Living Allowance.
- Pregnancy / maternity: The resident pays the permit voucher, if required by a visitor within pregnancy or maternity. A dispensation for new parent vouchers allows those with newly born children to allow their family/friends utilise a free visitor voucher near the time of a new child (born or adopted).
- Age (older people): No cost increases to concessionary rates that anyone over 60 could claim.

A public consultation will take place, which is required as part of the fees and charges notice process. This will occur before implementation of the savings proposals to allow a more thorough assessment of the views and potential impacts of the residents affected. Additionally, a comprehensive communications plan will ensure all changes to parking vouchers are communicated clearly to residents with direction for those with possible mitigations to alternative provisions.

- Enforcement of environmental and highways offences  
The way in which environmental and highway offences are enforced will be reviewed. The only additional enforcement will be littering from cars, though we already enforce littering from pedestrians. The proposal would consolidate the enforcement of different environmental and highway offences, which we already enforce within different teams. No equalities impacts are expected.
- Reduce bulk overtime and agency usage for weekend shifts in Street Operational Services  
By recruiting to 22 vacant posts to cover 35-hour weeks including weekend shifts, agency and overtime usage will be reduced across Street Environment Operations. The saving is generated through the difference between the cost of weekend agency staff and equivalent contracted council staff. Throughout the process of implementing the proposal, the relevant staff and unions will be engaged throughout. Regular meetings are in place between management and the unions to be able to engage and pick up issues related to staff changes.
- Bunhill Heat & Power Network

This is the estimated net initial operating surplus for the new Bunhill Heat and Power Network. This takes into account reduced heating costs for local residents and all operating costs for running the heat network, including the purchase of gas to operate the Combined Heat and Power (CHP) engine. Income comes from the sale of heat and electricity, as well as from renewable heat incentives government grant. The full business plan will come into force in July 2022.

- Revise approach to Commercial Waste Services

A review of Commercial Waste Services has been undertaken alongside the development of a draft commercial waste and recycling strategy. Taking into consideration collection and disposal costs, focussing on the in-borough commercial waste market will enable us to withdraw a single waste crew (currently covered by agency staff). No equalities impacts are expected; in-house FTE staff will not be impacted.

- Additional income in the Highways and Streetworks team

This savings options relates to existing, additional income that is being generated from Streetworks Licences for scaffolding, hoarding and materials. The service over-achieved on the income budget in 2020/21 and is forecast to do so again in the current financial year (2021/22). Whilst there are individual pressures within the overall position, the proposal estimate £0.200m of additional income that can be baselined in the budget. This saving recognises the additional, ongoing income the service can expect.

- Greenspace and Street Environment Operations

This option encompasses five service operation changes within Greenspace and Street Environment Operations (SEO) to improve service operation and deployment. This includes:

- 1) Organise all cleaning teams in both services to respond to low-level graffiti and flyposting removal by providing graffiti wipes/scrapers/snips to street cleansing staff, reducing agency staff by one FTE (£0.068m).
- 2) Mechanical sweepers to carry out a litter bin washing programme on their pre-existing rounds (£0.033m). This will enable the removal of one FTE pavement washer without a reduction in borough-wide pavement washing.
- 3) As evidenced in the recent switch from vehicles to bikes in SEO, Greenspace will also reduce vehicles (£0.030m saving) by switching to electric bikes (reduction of three vehicles) for supervisors and implementing static gardeners (reduction of three vehicles).
- 4) Reducing downtime for Grounds Maintenance crews by deploying more locally meaning the grounds services will be able to further develop their commercial offer to carry out more paid works (£0.020m saving).
- 5) Introduce weekend contracts for the Parks litter team to reduce overtime in the service (£0.050m). This approach was successful when introduced in SEO.

### *Previously agreed Savings:*

There was one approved savings proposal, which identified potential impacts:

- Business Information Team Restructure

The savings for 2021/22 had no impact on staffing within the service, which included:

- From part of post which became vacant following staff member taking redundancy as they were at age to take this and get their pension
- From vacant post in service

The service is no longer within Community Safety. Following the SLT restructure earlier this year, the service area is Business Improvement and Performance

The service has reorganised how it works to keep service delivery by spreading some of the work to account for when staff are on leave.

The second part of the review for the 2022/23 year is still due to go ahead in its current form as described but is dependent on some external work we are currently doing with HM Land Registry, which will take part of the service delivery. This follows HM Land Registry legislation to take on this task as outlined in the EQIA.

## **f) Fairer Together**

### *New savings*

There were no new savings proposals with equalities impacts submitted for 2022/23.

### *Previously agreed savings*

There were no new savings proposals with equalities impacts submitted. This directorate did not exist prior to the 2021/22 financial year and therefore no previous existing savings.

## **g) Homes and Neighbourhoods**

### *New savings*

The Homes and Neighbourhoods directorate (previously Housing directorate) did not submit any new savings for 2022/23 with equalities impacts.

### *Previously agreed savings*

The Homes and Neighbourhoods directorate (previously Housing directorate) did not submit any savings with equalities impacts.

## **h) Resources**

### *New savings*

The Resources directorate put forward one saving proposals in the 2022/23 Budget; this will not have a negative impact on residents, staff or service-users as it relates to the improvement of debt collection systems.

#### *Previously agreed savings*

There were no previously agreed savings proposals with equalities impacts submitted.

## **6. Staffing Impacts**

As summarised in section 3, some proposals will have staffing implications. While the significant majority will come from deleting / not recruiting to vacant posts, some proposals will have implications which may include changes to current roles or a potential risk of redundancy (for a very limited number of staff).

The impacts of these proposals on staff with protected characteristics cannot yet be fully determined but as numbers are low and spread across a number of services / types of roles there are unlikely to be any groups disproportionately impacted. Any changes to staffing structure will require consultation with staff unions in accordance with the council's reorganisation policy and procedures.

Our established organisational change process ensures we support all of our staff through this change. Where restructures are proposed we carry out a comprehensive Staffing Impact Assessment that identifies the implications for those with protected characteristics and finds ways to mitigate accordingly.

Where a redundancy situation is possible, we will take a number of steps including:

- Not filling vacancies in advance of a restructure so as many opportunities as possible are available to our existing staff;
- Using our redeployment process to help staff at risk find suitable alternative employment within the council;
- Considering alternative options to redundancy such as early retirement, flexible working or other 'working differently' options;
- Stress management support and counselling services will be offered to staff through the Employee Assist Programme to help them cope with the additional pressures that structural change may bring.

We have an ongoing commitment to making Islington an employer of choice and are Timewise accredited, supporting flexible working opportunities available where possible, including condensed hours, flexible start and end times and part time working.

The Council is committed to a workforce that is representative of the borough at all levels and will continue to look for new ways to improve progression routes for staff and equip them to be senior managers of the future. We will continue to promote our staff equality

forums as a way of engaging with staff and working together to continually improve their experience of working in Islington.

## **7. Human Rights and Safeguarding**

### **Human Rights**

It is unlawful for the council to act in a way that is incompatible with a European Convention right (unless the council could not have acted differently as a result of a statutory provision).

An interference with a qualified right (e.g. the right to respect for private and family life) is not unlawful if the council acts in accordance with the law and the interference is necessary in a democratic society.

In deciding whether the interference is necessary, the law applies a proportionality test, including whether a fair balance has been struck between the rights of the individual and the interests of the community.

### **Safeguarding**

#### **Implications for safeguarding in Adult Social Care**

Proposals outlined in this document build on the Council's work on Making Safeguarding Personal (MSP). MSP is enshrined in the Care Act (2014) and the Pan London Safeguarding Adults Policies and Procedures.

MSP puts the person at risk of harm or abuse at the centre of decisions and actions about them. Just like the Strengths Based Practice approach for general social work activities, MSP respects that adults often bring ideas and solutions which will work best for them and the outcomes they need support in achieving.

This means that safeguarding adults continues to be integral in the work we are undertaking to really embed strengths-based practice. Ensuring vulnerable adults are safe and focusing on wellbeing is a core element of strengths-based practice and ensures there is consistency in approach whether we are working with a vulnerable person on a support plan or a safeguarding plan.

#### **Implications for safeguarding in Children's Services**

Safeguarding children is about protecting them from maltreatment, preventing their health and development being impaired, ensuring that they grow up in environments which provide safe and effective care and taking action to enable all children to have the best outcomes.

The mitigation identified for each proposal reduces very significantly the risk of poor safeguarding practice. The council's mitigation should include not adopting any policy where safeguarding practice is adversely affected.

The proposals put forward have been tested against effective safeguarding practice. A broad range of quality assurance measures are already in place and will continue to be monitored and responded to robustly.

## **8. Monitoring**

Whilst the overall assessment is that there is not a cumulative negative impact on any group as a result of the savings proposals, there is a need to continue to monitor this. This year, the Equalities Team has reviewed the equalities impacts from current savings to screen for any unexpected impacts as the projects have progressed – this process will continue.

Each individual proposal will continue to be reviewed and updated as required. Consultation will be carried out where required to seek the views of residents and service users. The lead officer for each proposal will be responsible for ensuring that equality considerations remain at the forefront of decision making as each of these proposals are progressed.

## **Annex A:**

### **Public Sector Equality Duty**

Section 149 of the Equality Act 2010 provides that:

(1) A public authority must, in the exercise of its functions, have due regard to the need to —

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

(2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to —

(a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic

(b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it

(c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

(4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

(5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to —

(a) tackle prejudice, and

(b) promote understanding.

(6) Compliance with the duties in this section may involve treating some persons more favorably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

(7) The relevant protected characteristics are —

- age
- disability
- gender reassignment, including non-binary and gender-fluid identification
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation.

(8) A reference to conduct that is prohibited by or under this Act includes a reference to —

- (a) a breach of an equality clause or rule;
- (b) a breach of a non-discrimination rule.

(9) Schedule 18 (exceptions) has effect.

## **APPENDIX H: Pay Policy Statement 2022/2023 in Accordance with the Localism Act 2011**

### **1. Chief Officer Pay scales**

The council's Chief Officers as outlined in the Local Government and Housing Act are its Chief Executive, statutory Chief Officers and non-statutory Chief Officers who are defined as:

- A person for whom the head of the authority's paid service is directly responsible
- A person who, as respects all or most of the duties of their post, is required to report directly or is directly accountable to the head of the authority's paid service; and
- Any person who, as respects all or most of the duties of their post, is required to report directly or is directly accountable to the local authority themselves or any committee or sub-committee of the authority; but excludes any person whose duties are solely secretarial or clerical or are otherwise in the nature of support services.

A Deputy Chief Officer, is defined as a person who, as respects all or most of their duties of their post, is required to report directly or is directly accountable to one or more of the statutory or non-statutory chief officers. The same exclusion applies concerning administrative and support staff.

Some senior manager posts which are not Chief Officers for the purposes of reporting under the Localism Act are also paid on this salary scale.

The council's Chief Executive is paid on a spot salary. This is currently £190,087 per annum and represents the figure for the financial year ending 31 March 2022. The pay negotiations for 2021/22 have yet to be agreed and are still ongoing.

The salary scale for Chief Officers comprises five separate salary bands and is locally determined.

Percentage increases in cost of living are applied in line with the national pay negotiations of the Joint Negotiating Committee (JNC) for Chief Officers of Local Authorities.

The job roles for those paid on the Chief Officer pay scale are evaluated using the Hay Job Evaluation Scheme and the conditions of service are in the main those of the JNC with slight local variations agreed by the council's Audit Committee. Any new or amended posts established at this level will be evaluated on the same basis.

**Table 1** sets out details of the Chief Officer posts as defined under the Act that are paid on the Chief Officer scale effective from 1 April 2021 and the pay band which applies to each post.

**Table 1 – Chief Officer Pay Bandings**

<b>Grade</b>	<b>Pay Banding £</b>	<b>Number of points in pay banding including threshold point</b>	<b>Job role</b>
CO1	117,624-141,480	10	Corporate Director of Environment Corporate Director of Resources Corporate Director of Children’s Services Corporate Director of Homes & Neighbourhoods Partnership Director of Fairer Together Corporate Director of Community Wealth Building
CO2	106,497-120,447	7	Director of Law and Governance Director of Human Resources Director of Finance Director of Digital Services Director of New Build Director of Housing Property Services Director of Housing Needs and Strategy Director of Homes and Community Safety Director of Safeguarding and Family Support Director of Integrated & Strategic Commissioning Director of Young Islington Director of Learning and Culture  Director of Adult Social Care Director of Public Protection Director of Environment & Commercial Operations Director of Climate Change and Transport Director of Early Intervention & Prevention Director of Inclusive Economy & Jobs Director of Corporate Landlord Services Director of Planning Director of Public Health*

CO3	89,646-106,029	7	
CO4	76,170-92,691	7	Director of Communications and Change

Posts marked with an asterisk (\*) are on NHS terms and conditions following a TUPE transfer, but are indicated for completeness within the band that most closely matches their NHS band grade.

In addition, there is a small number of posts that meet the definition of 'Deputy Chief Officer' as set out in the Local Government and Housing Act that are not at Chief Officer grades. This is because in our hierarchy, there are three post-holders at grades CO2-4 who report directly to the Chief Executive. These posts are evaluated on the Greater London Provincial Council (GLPC) Job Evaluation Scheme and paid in line with the regionally agreed GLPC pay spine.

Senior posts which the council shares with another organisation in a shared service or other joint arrangement (e.g. the joint Director of Public Health with the London Borough of Camden) are only included in this statement if the post holders are employed by Islington Council.

## 2. Pay ratios

The council is committed to tackling income inequality as a means of ensuring a fairer Islington and is setting an example to other local employers by reducing the pay differential between the lowest and highest paid employees.

The council is a London Living Wage employer and also works with other local employers and its own contractors to ensure that the London Living Wage is the minimum pay to their staff.

The information below describes the pay ratio between the council's highest paid employee (the Chief Executive who is on a salary of £190,087 per annum figure worked out as 1 September 2021) and other staff by reference to the following:

- (i) The numerical difference between the highest and lowest paid employees
- (ii) The mode (most common salary)
- (iii) The median (mid -point between highest and lowest salaries) and
- (iv) The mean average (the total amount of remuneration paid to employees divided by the number of employees)

**Table 2 - Pay Ratios**

<b>Reference Point</b>		<b>Annual Salary</b>	<b>Ratio to highest paid employee salary</b>
i)	lowest paid full time council employee – London Living Wage £11.05 per hour	£20,167	1:9.42
ii)	Most common salary paid to a council employee (the mode)	£33,474	1:5.68
iii)	Mid -point between the highest and lowest salaries (the median)	£35,949	1:5.29
iv)	Average salary (the mean)	£37,803	1:5.03

The Islington Fairness Commission, set up by the council in June 2010 to look into how to make the borough a fairer place, produced its final report in June 2011. This report recommended that the pay ratio between the highest and lowest salaries should be no more than 1:10. This was adopted as policy by the council in its Corporate Strategy. The current pay ratio at 31 January 2022 is 1:9.42. This is below the recommended ratio between the highest and lowest salary (1:10).

\* Election duty fees which may be received by the Chief Executive in their role as returning officer are not included as these do not arise in every year and are variable.

### **3. Recruitment of Chief Officers**

Recruitment to all Corporate Director and Director posts is the responsibility of the Personnel Sub-Committee as set out in the Council’s Constitution and covered by the requirements of the council’s Officer Employment Procedure. The appointment of the Chief Executive is subject to the approval of the full Council.

The starting salary level of such officers is also agreed by the Personnel Sub-Committee. This ensures that elected councillors are accountable for the salaries of these senior appointments and that they are made in a transparent way without delay to appointment processes.

New entrants to the council are generally appointed to the first point of the pay scale. Only in exceptional circumstances, such as the need to match a candidate’s existing salary are appointments made above the first point of the salary scale. All new entrants to the council are placed on a probationary period of six months, regardless of previous local government service, including senior staff. During this time, the new recruit is expected to demonstrate their suitability for their job role. Failure to do so could lead to their appointment being terminated. Employees who successfully complete their probationary period are entitled to a salary increment, if it would

otherwise mean that they would have to wait more than twelve months for their next salary increment.

On occasion, individuals are appointed on an interim basis to cover a vacant Chief Officer post, whether directly employed or engaged through an agency or as a contractor. The council takes a proactive and stringent approach to ensuring that all arrangements are lawful, follow procurement rules, represent value for money and properly reflect the substance of the relationship between the council and the individual concerned.

#### **4. Pension Arrangements**

All council employees up to 75 years of age and who have a contract for at least three months service have the right to join the Local Government Pension Scheme (LGPS) other than those on NHS terms and conditions. There is however, a right to opt out of the scheme and employees can make their own private pension arrangements.

The LGPS is a contributory scheme, whereby the employee contributes to the scheme from his or her own salary. Employees will contribute 5.5% - 12.5% of their salaries according to the figures set out in table 3 below in 2021/2022. The salary bandings are reviewed annually.

**Table 3 – Employee Contribution Rates (2021/2022)**

<b>Whole time salary</b>	<b>Employee Contribution Rate (% of salary)</b>
Up to £14,600	5.5
£14,601 to £22,900	5.8
£22,901 to £37,200	6.5
£37,201 to £47,100	6.8
£47,101 to £65,900	8.5
£65,901 to £93,400	9.9
£93,401 to £110,000	10.5
£110,001 to £165,000	11.4
More than £165,001	12.5

Employers' contributions to the LGPS vary to ensure that the benefits under the scheme are properly funded, and are set independently. Full details are available on the LGPS website.

The Council's Flexible Retirement Policy allows employees aged 55 and over who are members of the Local Government Pension Scheme (LGPS) to apply to reduce their working hours or pay grade (stepping down) and to draw pension benefits accrued up until the transfer to flexible retirement.

Where an employee is in receipt of a pension from the council and obtains a job with another local authority or any other employer who participates in the LGPS, they are obliged to notify the council and their pension will then be adjusted so that they are not (with the new job and the pension) drawing more than their original salary.

The NHS scheme is a contributory one and scheme members contribute to the scheme from his or her own salary. Contribution rates from 2015/2016 until 2021/2022 range from 5% for those on a salary of up to £15,431.99 to 14.5% for employees earning £111,377.00 and over. These rates are subject to review by Government with the employer's contributions also determined by the Government.

Islington Council also has a number of employees who are paid on the Soulbury Committee salary scales. This group is mainly made up of professional Educational Psychologists. They report to the Direct of Learning and Schools in the People Services Department. For the period commencing 1 April 2020 the member pay contribution rate was 7.4% for a salary up to £28,309.99 per annum to 11.7% for a salary over £81,662 per annum.

## 5. Additional Payments

The council recognises that in certain, limited circumstances additional payments may need to be attached to particular posts because of recruitment difficulties or particular employees may need to be remunerated or awarded an additional payment above that of their normal pay scale either for exceptional performance or additional work undertaken. Such payments must be authorised in advance by senior management and details of the nature of and eligibility for those payments which may be made to Chief Officers on the Chief Officer scale are given in table 4 below.

**Table 4 - Allowances**

<b>Type of allowance</b>	<b>Reason for Payment</b>	<b>Eligible Group</b>
Honorarium payments	Undertaking additional work or project	All employees
Market Factor Supplement	To attract and retain employees with specialist skills in a competitive job market.	All employees in posts that are demonstrated to be hard to recruit to in accordance with the council's Market

		Supplements Policy.
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The Corporate Director of Resources post attracted an allowance of £10,275 for statutory duties as the Council's s.151 officer.

The Corporate Director of People post attracted a Market Factor Supplement of £2,500 during the 2021/22 year.

The Director of IT and Digital Services post attracted a Market Factor Supplement of £5,000 during the 2021/22 year.

Any new honorarium payments to Chief Officers must be agreed by the Chief Executive in consultation with the Chair of the Audit Committee.

There are other allowances payable to designated employees related to their job role, for example call-out or standby allowances. Chief Officers do not receive such payments other than those stated above and the council does not make bonus payments to Chief Officers.

Where council officers undertake special duties in relation to the council's election functions, any fees in respect of these duties are paid in addition to their normal remuneration. The rate for these duties is in line with the London Council's Leaders' Committee's published Scale of Returning Officers' Fees and Expenses.

Council officers designated as Local Area Liaison Officers to undertake responsibilities under the council's emergency planning Crisis Response Plan in the event of an incident occurring in the borough, may be paid a fixed allowance in respect of this responsibility. See the council's website for further details.

**6. Hours of work**

The basic full time hours of work for council employees are 35 per week. Employees on grades below that of senior officers, who work more than 35 hours per week may claim overtime for additional hours worked, if authorised.

The minimum basic working week for senior officers is 35 a week and additional hours worked above 35 per week per week attract neither payment in respect of overtime nor time off in lieu. Senior officers are required to undertake reasonable hours of work as necessary to perform the duties of their post. This may involve evening and weekend working.

**7. Annual and other leave arrangements**

Annual leave plays an important part of the council's commitment to work-life balance. The Chief Executive and senior officers of the council on Chief Officer Pay and conditions are entitled to 27 days annual leave and after five years' continuous local government service a further 5 days. Other employees receive 25 days' annual leave with an additional five days after five years' service. All employees in addition to annual leave receive five privilege days and eight bank holidays per year. Adjustments had been made during the COVID-19 pandemic to allow (by exception) employees who have been unable to take all of their annual leave entitlement because of their work in delivering the council's response to Covid-19 to carry forward up to four weeks (20 working days) to the new financial year (2021/2022). From 1 April 2022, the council will return to allowing carry-over of 5 days with any additional days agreed by exception with formal sign-off.

## **8. Benefits**

To maintain employee engagement, the council recognises, particularly in the current financial climate, that it is important to reward and motivate staff through other non-salaried means. The council promotes a range of benefits which all staff, irrespective of grade, can access. These include childcare vouchers and a tax-free bicycle scheme. There are also a number of discounted benefits which are open to all employees, such as discounted gym membership which is provided at no cost to the council.

## **9. Leaving the Council**

Employees who voluntarily resign from the council are not entitled to a termination payment.

Employees who are made redundant are entitled to a redundancy payment based on the statutory redundancy scheme with regards the calculation of the number of week's redundancy pay but, as sanctioned in the Local Government (Early Termination of Employment) Discretionary Compensation Regulations, actual salary is used rather than the statutory maximum of £544 per week.

In exceptional circumstances, the Council may exercise its powers under the above-mentioned Regulations and award a discretionary payment to senior staff in line with the council's discretionary termination compensation policy, for those whose employment is terminated by reason of redundancy or in the interests of the efficiency of the service, including early retirement.

The following factors will be taken into account when deciding whether to award a compensatory payment under these Regulations and, if a compensatory payment is made, the amount of that payment:

- Individual financial and other personal circumstances
- The council's interests, including corporate and service imperatives
- The council's fiduciary duty, including its duty to protect the interests of council tax payers and to exercise prudence and propriety
- Overall work record of the employee, including performance, attendance, length of service, level of responsibility and disciplinary record.
- Any other factor relevant to the individual case.

Where a Chief Officer's contract is terminated in the interests of the efficient exercise of the Authority's functions, they are contractually entitled to six months' notice or may be paid in lieu of notice where their contract provides for this.

The Audit Committee (or its Personnel Sub-Committee) will hear representations in respect of the termination of a Corporate Director or Director's employment in accordance with the Officer Employment Procedure Rules.

In the case of the Chief Executive, the Audit Committee (or its Personnel Sub-Committee) will approve the early retirement of the post holder and agree the award of any discretionary payments in connection with such retirement or redundancy in line with the policy outlined above. No such discretionary payments were made.

The Audit Committee (or its Personnel Sub-Committee) will also approve any payment funded by the council (excluding pension strain) in line with the policy outlined above to any other officer which exceeds £100,000. This ensures that elected councillors are accountable for payments made in these circumstances without delay to finalising arrangements. No such payments were made in the financial year 2021-2022.

## **10. Returning to work for the council after leaving**

Employees who leave the council voluntarily without a severance payment are free to apply for jobs that are advertised at their discretion.

Employees who leave the council with a redundancy payment and subsequently apply and are successful for a position within the council must repay any redundancy payment, if the appointment is within four weeks of their termination date. If the appointment start date is longer than four weeks, the employee can return to work in the position offered but in accordance with the Redundancy Modification Orders, will lose their contractual rights to have their continuous service recognised for all purposes.

Employees who leave the council with an enhanced severance package will not normally be re-employed or engaged under a contract for services for a period of two years.

Employees who leave the council on ill-health retirement with the possibility of a return to work under the Local Government Pension Scheme Regulations or who are granted early retirement will be considered on a case by case basis depending upon the circumstances and having due regard to their termination package.

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