

**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)

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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/make)

## 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 \(www.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-for-waste)

<sup>7</sup> [Waste - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/waste)

<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.