

NORTH LONDON WASTE AUTHORITY

REPORT TITLE: CONSULTATION AND POLICY UPDATE

REPORT OF: MANAGING DIRECTOR

FOR SUBMISSION TO: AUTHORITY MEETING

DATE: 3 DECEMBER 2020

SUMMARY OF REPORT:

This report provides an update on consultations and policies that have the potential to impact on the Authorities activities. It provides an update on the revision of the waste management plan for England, consultation on the White Paper – Planning for the future, an update on progress of the Environment Bill, an update on the plastic packaging tax and details on the North London Waste Plan consultation.

RECOMMENDATIONS:

The Authority is recommended to:

- A. Note the contents of this report; and
- B. Approve the draft response to the North London Waste Plan (NLWP) Main Modifications consultation enclosed as Appendix A to this report.

SIGNED: .....Managing Director

DATE: 23 November 2020

1. PURPOSE AND STRUCTURE OF THE REPORT

1.1. The Consultations and Policy Update is a regular report which provides an update for Members on consultations and policy issues that are relevant to the Authority such that the proposals have the potential to affect the Authority's operations and/or costs. The report additionally seeks approval for responses where appropriate.

1.2. For this particular report there is one draft consultation response for Members to consider; the report is organised as follows.

1.2.1 Revision of the waste management plan for England

1.2.2 White paper – planning for the future

1.2.3 Environment Bill progress

1.2.4 Plastic packaging tax

1.2.5 North London Waste Plan Consultation

2. REVISION OF THE WASTE MANAGEMENT PLAN FOR ENGLAND

2.1. Under the Waste (England and Wales) Regulations 2011 the Government is required to review the Waste Management Plan every 6 years. The content of the Plan is determined by the requirements of Schedule 1 to the Waste (England and Wales) Regulations 2011. The Plan provides an analysis of the current waste management situation in England. It is primarily about the quantity of waste there is in England and how that waste is managed. The Plan sets out a summary of current policies, not new policies, or announcements and reflects the policies included in the Government's Resources and Waste Strategy, published in 2018.

2.2. The consultation sought views on whether the draft Plan, when combined with waste planning policy, would fulfil the obligations of the Waste (England and Wales) Regulations 2011, as far as England is concerned, and allowed consultees to comment on the proposed Plan.

2.3. The Authority responded to this consultation, deadline of 15 October 2020, suggesting that as there is on-going policy development work taking place with the Resources and Waste Strategy, a new Waste Management Plan focussed on current policies will be limited. It would seem appropriate to propose reviewing the waste plan sooner than 6 years so that the new policies that are likely to emerge in the next few years from the deposit return scheme (DRS), extended producer responsibility (EPS) and consistency in collections are included. By that point, it may also be timely to include policy expectations as set out in the current Environment Bill.

3. WHITE PAPER – PLANNING FOR THE FUTURE

- 3.1. This consultation covered a package of proposals for reform of the planning system in England, covering plan-making, development contributions and other related policy proposal.
- 3.2. Although this does not directly impact on the Authority, from a planning perspective there are potential implications on the safeguarding of current and future waste infrastructure. In this regard the Authority responded to the consultation deadline of 29 October 2020 in support of the submission by the London Waste Planning Forum. The London Forum of Amenity and Civic Societies is the umbrella organisation for the civic movement across London. Our membership comprises some 120 civic societies and residents' associations across the Capital, as here, with a total membership of some 100,000 households. The key points of this submission were:
 - 3.2.1. Waste planning does not appear to have been considered when drawing up the proposals for Local Plans. When considering policies related to planning as a whole, it is essential that waste planning is given due consideration as it has specific requirements which are not always aligned with those for housing development.
 - 3.2.2. Any "simplification" of Local Plans will need to take into account the process and evidence required to prepare Waste Local Plans as well as the type of land needed for waste facilities and the ability of Local Plans to safeguard that land for the continued operation of waste facilities.
 - 3.2.3. The draft 2020 Waste Management Plan for England (WMPE) appears to be inconsistent with the planning white paper, which proposes to abolish the duty to co-operate but consider the way in which strategic cross boundary issues can be adequately planned for. The draft 2020 WMPE introduces a requirement for strategic policy-making authorities to cooperate with each other in the preparation of policies which address strategic matters. It would be helpful if the two documents aligned.
 - 3.2.4. It is important that a mechanism is put in place to ensure that the identification of Growth and Renewal areas will not jeopardise existing waste infrastructure or the ability to find land suitable for new waste facilities. While different waste management technologies have different impacts, it will continue to be important to safeguard land suitable for waste uses which do not hinder the ability of the facility to operate successfully. For this reason the 'Agent of Change' principle as set out in the National Planning Policy Framework (NPPF) and the NPPW (National Planning Policy for Waste) expectation that new non waste development

should not hinder the operation of existing facilities should continue to be applied.

- 3.2.5. Some waste facilities fall under the NSIP (Nationally Significant Infrastructure Projects) regime which provides a national assessment whilst considering local policies that are in place. However, the relationship between the NSIP regime, the DCO process, the London Plan and Local Plans needs to be carefully considered in the context of the identified need in Waste Plans.
- 3.2.6. Waste planning is a very specialised area of planning and requires technical knowledge and skills. Waste planning is often done jointly with groups of authorities planning for waste collectively, and this takes time. More resources would need to be made available to waste planning authorities to enable them to meet a 30-month timescale for a waste plan.
- 3.2.7. Adequate waste infrastructure is essential to sustainable areas. Providing waste facilities in proximity to where the waste is generated is one of the tenets of waste planning because it reduces the need for journeys by road vehicle. Identifying sufficient land suitable for waste facilities to meet the needs of an area means safeguarding industrial land and protecting it from sensitive uses which can hinder the ability of existing uses, such as waste facilities, to operate successfully.

4. ENVIRONMENT BILL PROGRESS

- 4.1. The Environment Bill includes details on creating a new governance framework for the environment, new direction for resources and waste management, improving air quality, securing water services, enhancing green spaces and updating laws on chemicals (REACH).
- 4.2. The first reading of the Bill was in January 2020 and it has been through a number of debate stages until November 2020. It is to be considered again by a Public Bill Committee which should report on 1 December 2020 before the third reading and then on to the House of Lords.

5. PLASTICS PACKAGING TAX

- 5.1. Earlier this year, the Government ran a consultation on the detailed design and implementation of the Plastic Packaging Tax. On 12 November 2020 the government published its response to feedback received through the consultation. Respondents agreed with the majority of the proposals in the consultation and the Government response confirms the proposals which received widespread support and sets out how they will approach the small number of areas of concern, such as those relating to competitiveness and supporting UK manufacturers.

- 5.2. In response to questions relating to the scope of the tax, the Government confirmed that the draft legislation for the tax defines ‘plastic’ as a material consisting of polymer to which additives or substances may have been added, with cellulose-based polymers classified as an exception.
- 5.3. Responding to a concern about the liability of the tax, on which respondents generally agreed that UK manufacturers should be liable, the Government intends the tax point should arise at the final stage of conversion – after ancillary processing, but before the packaging is packed or filled.
- 5.4. On 13 November 2020, the Government published draft primary legislation for technical consultation which sets out the key features of the tax. These include:
- 5.4.1. a £200 per tonne tax rate for packaging with less than 30% recycled plastic
 - 5.4.2. the scope of the tax by definition of the type of taxable product and recycled content
 - 5.4.3. who will be liable to pay the tax and need to register with Her Majesty’s Revenue & Customs (HMRC)
 - 5.4.4. the exclusion for producers and importers of under 10 tonnes of plastic packaging per year
- 5.5. The closing date for comments is 7 January 2021 and then the Government will introduce this legislation in a future Finance Bill. The Government will then publish secondary legislation and guidance giving more detail, in preparation for the introduction of the tax and to meet the new requirements from April 2022.
- 5.6. Officers do not recommend the Authority responds to this consultation as our main concern about the definition of plastic which will be taxed (as outlined in paragraph 5.2) has now been addressed. The other points are outside our remit and industry specific.

6. NORTH LONDON WASTE PLAN CONSULTATION

- 6.1. The North London Waste Plan (NLWP) or ‘the Plan’ is the spatial planning strategy for waste management facilities in north London. The NLWP will also set out the planning framework and associated planning policies against which planning applications for new waste facilities will be assessed in north London for the next 15 years. The NLWP is being prepared by the seven north London boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest in their capacities as planning authorities. NLWA is a consultee to the Plan.

- 6.2. The seven north London boroughs consulted on the proposed submission NLWP between 1 March and 12 April 2019. The Plan was then submitted to the Secretary of State for Housing, Communities and Local Government on 8 August 2019.
- 6.3. The NLWP is currently is being examined by an independent Planning Inspector, whose role is to assess whether the plan complies with the legal requirements and is sound. Following some NLWP public hearing sessions in November 2019, (which NLWA officers attended), where the Inspector heard in person from consultees, the north London boroughs are now consulting on Main Modifications to the NLWP.
- 6.4. A schedule of Proposed Modifications has been published for consultation along with a Sustainability Appraisal Addendum, Habitat Regulations Assessment and other supporting documents. These documents are available on the NLWP [Examination](#) webpage. The consultation runs from Thursday 29 October to Thursday 10 December 2020.

6.5. **Proposed NLWA response to the Main Modifications**

- 6.5.1. Given the relevance and potential impact of the NLWP on NLWA, it is important that the Authority responds to the NLWP consultation. NLWA has responded to all previous consultations on the Plan. Appendix A to this report sets out NLWA's draft response to the Main Modifications. At this stage all consultees can comment only upon issues of soundness or legal compliance. It is not possible to submit comments on the content of the plan per se. To be regarded as 'sound' the NLWP must meet one of the following tests which are set out in the National Planning Policy Framework (NPPF) paragraph 35:
- 6.5.2. **Positively prepared** – provides a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that any unmet planning needs from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- 6.5.3. **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- 6.5.4. **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- 6.5.5. **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework

6.5.6. The key points in NLWA's draft response are focussed upon proposed Main Modifications which affect the status and potential use of the Authority's Pinkham Way site with reference to the tests of soundness outlined above. The key points are as follows:

6.5.6.1. Main Modification (MM)113 shows a new map of the Authority's and LB Barnet's Pinkham Way site and supporting text which suggests a reduced area is suitable for potential development. Specifically, the modification now excludes the whole of the flood risk area and land outside of NLWA ownership for potential development. NLWA's representation argues that this approach is not justified by the supporting evidence submitted by the NLWA, because waste facilities can be developed on flood risk areas and therefore the modification is considered unsound.

6.5.6.2. MM113 includes wording about community concerns in relation to the potential development of the Pinkham Way site for waste uses. Community concerns are a matter of record and this is not an appropriate amendment to a policy document. The Authority's response therefore notes that the Plan should be confined to setting out the appropriate mitigation to address agreed concerns.

6.5.6.3. MM46 leads to new text that states waste facilities are considered suitable on industrial land. The modification states that this is line with National Planning Policy for Waste and the London Plan. The adopted London Plan states that industrial locations and employment areas are suitable (Policy 5.17); and the emerging London Plan recommends industrial sites only (Policy SI 8). NLWA's response notes that as currently drafted, the new text is not consistent with national planning policy and it also raises questions in terms of justifying the subsequent spatial strategy promoted in the Plan. If the modification remains in the Plan there is then an inconsistency between the inclusion of Pinkham Way and the stated policy that waste sites should be on industrial land. NLWA's draft response therefore argues that this proposed modification should not remain.

6.6 The Authority is recommended to approve the draft response in Appendix A.

7. EQUALITIES IMPLICATIONS

7.1. The equalities implications of specific consultation proposals are considered at the time of each consultation.

8. COMMENTS OF THE LEGAL ADVISER

- 8.1. The Legal Adviser has been consulted in the preparation of this report and comments have been incorporated.

9. COMMENTS OF THE FINANCIAL ADVISER

- 9.1. The Financial Adviser has been consulted in the preparation of this report and comments have been incorporated.

List of documents used:

Waste (England and Wales) Regulations 2011 available at:

<https://www.legislation.gov.uk/uksi/2011/988/contents/made>

Resources and Waste Strategy for England, 2018 available at:

<https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>

Waste Management Plan for England available at:

<https://www.gov.uk/government/publications/waste-management-plan-for-england>

Consultation on the Waste Management Plan for England, 2020 available at:

<https://www.gov.uk/government/consultations/waste-management-plan-for-england>

White Paper, Planning for the Future, 2020 available at:

<https://www.gov.uk/government/consultations/planning-for-the-future>

The Environment Bill 2019-21, progress updates available at:

<https://services.parliament.uk/bills/2019-21/environment.html>

Plastic Packaging Tax – summary of responses to consultation on policy design, available at:

<https://www.gov.uk/government/consultations/plastic-packaging-tax-policy-design>

Plastic Packaging Tax Policy Paper, published 12 November 2020 available at:

<https://www.gov.uk/government/publications/introduction-of-a-new-plastic-packaging-tax/introduction-of-a-new-plastic-packaging-tax>

North London Waste Plan Main Modifications available on the examination page of

www.nlwp.net

Contact officer:

Ann Baker

Unit 1b Berol House

25 Ashley Road

London N17 9LJ

020 8489 5730

ann.baker@nlwa.gov.uk



Public Consultation on Main Modifications to the Proposed Submission North London Waste Plan (NLWP)

Representation Form and Guidance Notes

Please save and return to feedback@nlwp.net by the end of Thursday 10th December 2020.

This form has two parts:

Part A – Personal details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Guidance notes are available at the end of the Representation Form. Please read the advice in the guidance notes on making a representation attached to the consultation before completing this response form.

Please note that any comments you make will be made publicly available and attributed to your name. Please see the [Privacy Policy](#) for details of how we use your information. We are required to share your information with the Planning Inspector for the purposes of the Examination.

Part A: Personal Details:

Name: Ursula Taylor

Job Title: Head of Legal and Governance
(where applicable)

Organisation: North London Waste Authority
(where applicable)

Agent representing:
(where applicable)

Address: Unit 1B, Berol House, 25 Ashley Road, Tottenham Hale, London, N17 9LJ

Telephone: 0208 489 5654

Email: Barbara.herridge@nlwa.gov.uk

Part B – Your representations

Please use a separate sheet for each representation

1. To which Main Modification does this representation relate?

(one modification reference per form)

Main Modification reference: MM113

Paragraph number: Appendix 2: Haringey Area Profiles – A22-HR Pinkham Way

2. Do you consider the proposed Main Modification to be:

Legally compliant (Y/N): Y

Sound (Y/N): N

3. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your comments relate to:

Positively prepared ✓

Justified ✓

Effective

Consistent with national policy

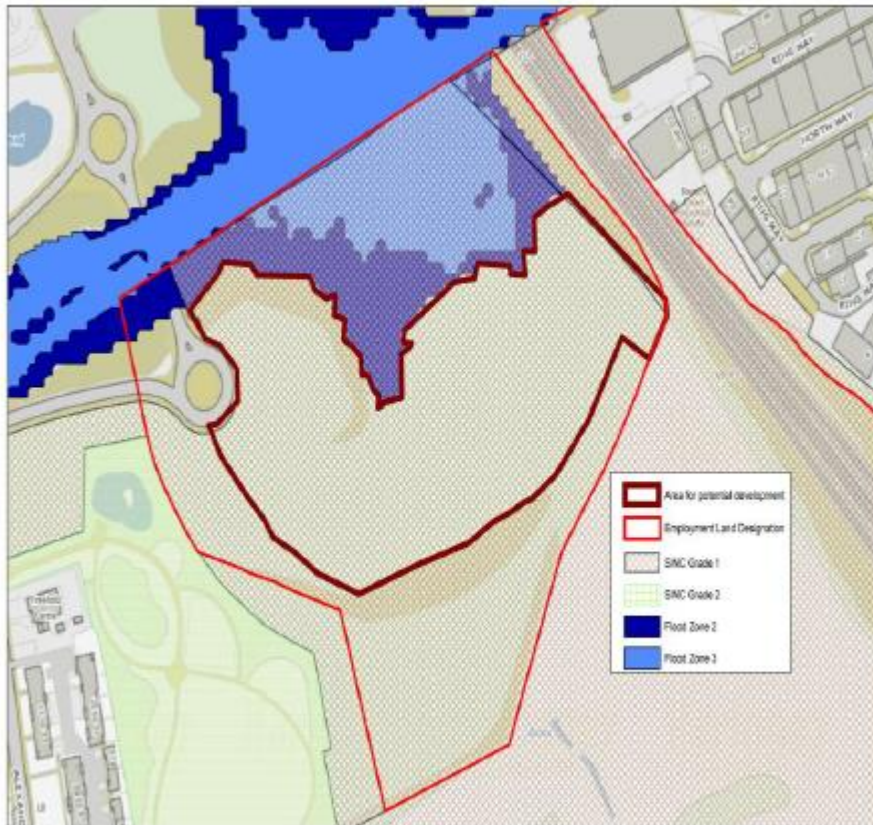
4. Please give details of why you consider the proposed Main Modification is not legally compliant or is unsound. Please be as precise as possible.

The proposed modifications to Appendix 2: Haringey Area Profiles – A22-HR Pinkham Way are considered unsound in two respects.

The **first issue** relates to the inclusion of a map and supporting text to suggest a reduced area for potential development, excluding the whole of flood risk area and land outside of NLWA ownership. This approach is not **justified** by the supporting evidence submitted by the NLWA and therefore the modification is considered unsound.

The proposed further modification text and accompanying map are as follows:

‘Given the land is in two ownerships, development would be better suited on land in the control of the NLWA to ensure deliverability. New development should be located in areas with the lowest risk of flooding. The map below shows the area of the Priority Area within which a site could come forward once land at risk of flooding and land outside NLWA ownership has been removed.’



The submitted evidence for the Plan includes the Flood Risk Sequential Test (2019), which states (Table 6) that the Pinkham Way site falls in Flood Zone 1, 2 and 3a. The report goes further to state that the proposed use at Pinkham Way is acceptable within the Flood Zone. At no point, does it suggest that the site area should be reduced to exclude land that is subject to flood risk.

The Flood Risk Addendum (2020) published with the Main Modifications clearly states that for all the sites/ areas under consideration (i.e. including Pinkham Way):

'As shown in Flood Risk Sequential Test (October 2019), not all of the required development can be located within the available area of Flood Zone 1, therefore development in Flood Zone 2 is appropriate. Not all the development can be located exclusively within the available areas of Flood Zone 1 or 2, therefore development in Flood Zone 3a is appropriate. Development in Flood Zone 3b is not appropriate.' (paragraph 3.3)

...

'The Flood Risk Sequential Test (October 2019) has shown how the Sequential Test has been applied to the proposed development and the conclusion of that report is twofold, firstly to conclude that it is necessary and appropriate to locate the proposed development in Flood Zone 1, 2 and 3a, and secondly that due to the proposed use consideration under the "Exception Test" is not required. They therefore pass the Sequential Test and may be considered further as areas for allocation in the NLWP.' (paragraph 6.4)

Again, at no point does the report suggest that site area should be reduced to exclude land that is subject to flood risk. In fact, the Flood Risk Addendum (2020) goes on to say that site layout should take account of flood risk and that this detailed matter should be addressed at the planning application stage (paragraph 4.12).

The map included in the Main Modification 113 excludes not only flood zone 2 land but also all of flood zone 3, with no differentiation made as to whether this is Flood Zone 3a or 3b. This does not reflect the evidence prepared in support of the Plan.

The proposed modifications directly contradict the evidence and conclusions presented in the Flood Risk Sequential Test and the Flood Risk Addendum. Excluding all land which has is subject to a higher risk of flooding has resulted in a much reduced and awkward shaped site, which could compromise the ability of the NLWA to bring forward an appropriate scheme and reduces the options for wider site benefits, for example the introduction of an enhanced ecological corridor. Instead, and as recommended by the Flood Risk Addendum, the whole site should be allocated, with the detail of site layout including the implications for flood risk considered at the planning application stage including any mitigation measures required.

Further there is nothing in the evidence to suggest that land in the ownership of London Borough of Barnet should be excluded from the site area. The authority has not submitted any evidence to say that land in their ownership should not be considered. Indeed the authority (in combination with the other North London authority) in their Main Matter response for the hearing sessions clearly supports the methodology for selecting the Schedule 2 and 3 areas (paragraph 61), states the areas identified are suitable for waste management facilities (paragraph 61.8) and that Pinkham Way should be retained within the Schedule 2 (paragraph 63.1). In the submitted Sites and Areas Report Appendix 6 – Haringey Area Proformas (2019), no particular issue was flagged with respect to deliverability /landownership. The report simply notes that the land is owned by two public bodies (Barnet Council and NLWA).

The **second issue** relates to the inclusion of wording about public concerns. This is contrary to the fact that a plan must be **positively prepared**. Therefore, this modification is considered unsound.

Revised text has been added about community concerns:

'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.'

This is not considered to be a helpful / appropriate statement in a policy document. Community concerns are a matter of record, the Plan should be confined with setting out the appropriate mitigation to address agreed concerns. Such statements do not help the plan be effective in its operation nor can it be seen as a positive approach to planning.

5. Please set out what change(s) you consider necessary to make the proposed Main Modifications legally compliant or sound, having regard to the test you have identified in Q3 above where this relates to soundness. You will need to say why this change will make the proposed Main Modification to the Proposed Submission NLWP legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The following text is proposed to align the plan with the evidence base and to ensure the Plan is fully justified by removing any references to reducing the site area and leaving such decisions to be determined in the planning application process.

The removal of the text regarding community concerns will ensure that there is a positive approach to planning.

<p>Potential mitigation measures</p>	<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 SINC.</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, development would be better suited on land in the control of the NLWA to ensure deliverability. New development should be located in areas with the lowest risk of flooding. The map below shows the area of the Priority Area within which a site could come forward once land at risk of flooding and land outside NLWA ownership has been removed.</p> <p><u>The map below shows the current Local Plan policy designations and the extent of the flood zones.</u></p> <p><u>[MAP – The map should be updated to remove the ‘area of potential development’]</u></p> <p>.....</p> <p>Any new waste facility in this Priority Area 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 <u>on this topic in relation to natural environment, flood risk and biodiversity</u> are set out below.</p> <p>.....</p>
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6. Do you require notification of any of the following to your email address stated in Part A:

The publication of the inspector's recommendations following the independent examination (Y/N): Y

The adoption of the Local Plan (Y/N): Y

Part B – Your representations

Please use a separate sheet for each representation

7. To which Main Modification does this representation relate? (one modification reference per form)

Main Modification reference: MM46

Paragraph number: 8.20

8. Do you consider the proposed Main Modification to be:

Legally compliant (Y/N): Y

Sound (Y/N): N

9. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your comments relate to:

Positively prepared

Justified ✓

Effective

Consistent with national policy ✓

10. Please give details of why you consider the proposed Main Modification is not legally compliant or is unsound. Please be as precise as possible.

MM46 introduces new text regarding appropriate land for waste facilities:

‘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. This is in line with policies in the NPPW and London Plan which direct new waste facilities towards industrial land. However, in preparing the NLWP, the North London Boroughs have sought to take this approach a stage further and identify the most suitable land in North London for a range of new waste facilities: “Priority Areas”.’

As currently drafted, the new text is not **consistent with national planning policy** and it also raises questions in terms of **justifying** the subsequent spatial strategy promoted in the plan

While it is true that waste facilities are industrial uses and therefore potentially suitable on industrial land, as directed by the NPPW and London Plan; this paints only a partial picture of the wider policy framework. The NPPW sets out that a ‘broad range of locations including industrial sites’ should be considered and that priority should be given ‘to the re-use of previously developed land, sites identified for employment uses...’

(paragraph 4). This wider definition is acknowledged in the evidence base (Sites and Areas Report, 2019, paragraph 3.7) but has not been taken forward to the Plan itself.

The adopted London Plan states that industrial locations and employment areas are suitable (Policy 5.17). It is acknowledged that the emerging London Plan recommends industrial sites only (Policy SI 8); however, on the basis of the new footnote in the modifications (AM, section 1.7 -clarifying the naming conventions for the adopted and emerging London Plans), it is assumed that the authority are referring to the adopted Local Plan in this instance.

The modifications make no explicit reference for waste facilities to be considered on other locations, such as employment areas, despite the inclusion of Pinkham Way (a designated employment site) in the NLWP. The modifications simply state that rather than directing all waste facilities to industrial land that the North London Boroughs 'sought to take this approach a step further and identify the most suitable land'. However, the Sites and Areas Report (2019) makes it clear that the methodology for identifying suitable land was far wider than just considering industrial sites. For example, in identifying a long list of potential sites, a wide variety of sites / areas with different land uses were considered not just industrial sites (Sites and Areas Report, Table 2). The supporting text needs to better reflect the selection process followed to avoid the Plan being internally inconsistent and to better align with the evidence base.

11. Please set out what change(s) you consider necessary to make the proposed Main Modifications legally compliant or sound, having regard to the test you have identified in Q3 above where this relates to soundness. You will need to say why this change will make the proposed Main Modification to the Proposed Submission NLWP legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To bring the NLWP into conformity with national policy and to provide a clear link between the evidence base and the spatial strategy, it is proposed that the majority of the new text is deleted. The proposed text is considered superfluous as the subsequent section (paragraph 8.21 onwards) sets out more accurately and in more detail the actual process followed to identify sites and areas. Paragraph 8.20 would thus read:

~~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. This is in line with policies in the NPPW and London Plan which direct new waste facilities towards industrial land. However, in preparing the NLWP, the North London Boroughs have sought to take this approach a stage further and identify the most suitable land in North London for a range of new waste facilities: "Priority Areas".~~ The proposed site and area search criteria used in the NLWP site and area selection process were developed based on the requirements of national waste planning policy. Both planning and spatial criteria were discussed with key stakeholders through a focus group session in spring 2014. Following the introduction of the NPPW

in October 2014, the site and area search criteria were reviewed to ensure compliance with this document.

12. Do you require notification of any of the following to your email address stated in Part A:

The publication of the inspector's recommendations following the independent examination (Y/N): Y

The adoption of the Local Plan (Y/N): Y