

## **Formal Approval of NLWP Post Inquiry modifications**

### **Recommendation**

Agree

- Further modifications arising from comments received on the NLWP Main Modifications Consultation. (See Appendix 1)

### **Background**

The NLWP was submitted to the Secretary of State on 8<sup>th</sup> August 2019. As part of the formal approval, Boroughs agreed delegated authority for any changes to the North London Waste Plan and supporting documents prior to, and during, the public examination into the Plan.

Prior to the public hearings, the inter-borough Planning Officers Group and Heads of Planning group considered proposed modifications in response to submissions. After the hearings, the Boroughs prepared Main Modifications to address the issues raised. These were approved by the boroughs through delegated authority.

The Main Modifications were consulted in October-December 2020. 24 representors made submissions. The Boroughs have prepared a Schedule of Responses and have proposed additional changes where appropriate. This will be given to the Inspector, along with all the representations made during consultation, and to inform the recommendations in his final report.

### **Summary of Further Modifications**

Further modifications are proposed as a result of comments received as part of the NLWP Main Modifications consultation. There are two modifications affecting two sites in the borough. These are MM114 Argall Ave and MM115 Temple Mills Lane. The updates respond to updated technical information on climate change-driven flood risk provided by the Environment Agency. These modifications are technical in nature and have no implications for the proposed uses of the sites concerned.

### **Documents to approve**

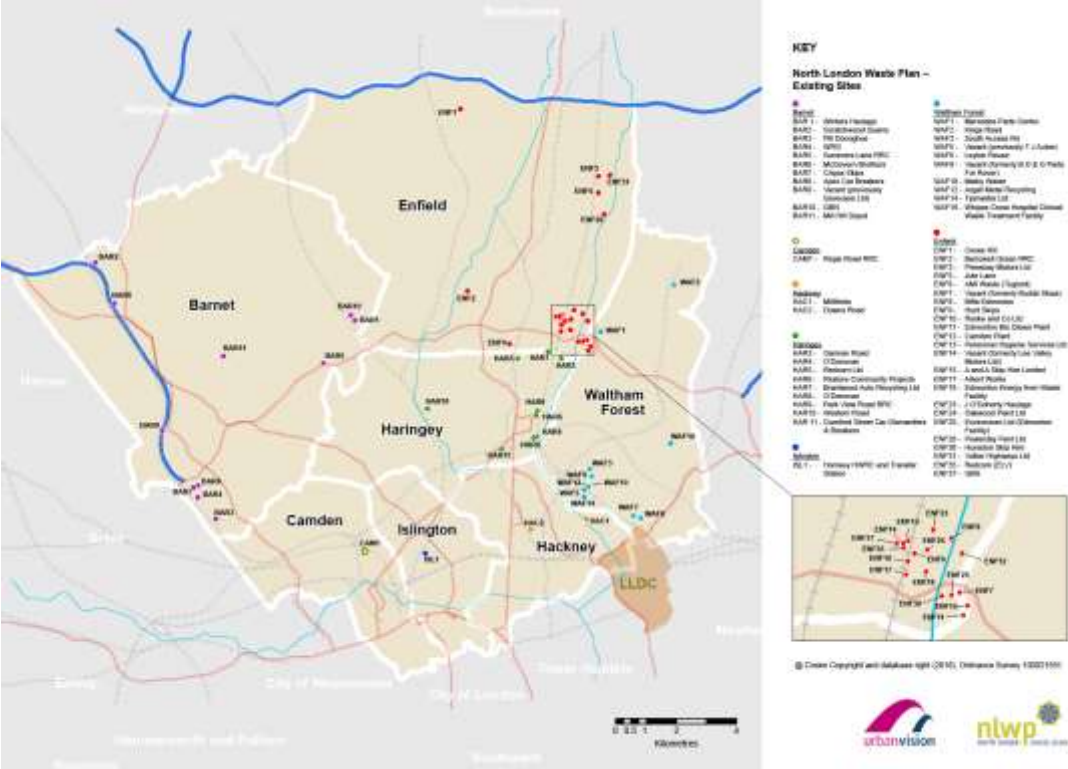
The Schedule of further modifications arising from comments received on the NLWP Main Modifications Consultation can be found at Appendix 1.

### **Next steps**

Once approved, the further modifications will be amalgamated with the existing Schedule of Main Modifications to provide the Inspector with a full list of modifications to the Proposed Submission NLWP. The Inspector will then write his report on the soundness of the plan. When that is received the boroughs can move towards adoption of the plan through cabinet and full council.

**Appendix 1: Further modifications arising from comments received on the NLWP Main Modifications Consultation**

Reference	Section	Further modification	Representor
N/A	General	Renumber the Tables so they are consecutive and amend supporting text accordingly.	N/A
MM1	1.3	<b>The Aim and Strategic Objectives:</b>	Pinkham Way Alliance
AM	1.11	The North London Waste Authority's (NLWA) <del>and the seven constituent boroughs have</del> <del>has</del> 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, <del>in particular household waste but also and also for the household</del> 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.	Pinkham Way Alliance
MM5	4.2	The Spatial Principles <del>Framework</del> flow from the Plan's Strategic Objectives and provides the strategic direction for the detailed policies of the NLWP and informs <del>s</del> site/area selection.	Pinkham Way Alliance
MM6	4.11	<del>It should be noted that the draft New London Plan identifies Enfield as a 'provide capacity' borough for the management of industrial floorspace capacity, and the other six North London Boroughs are identified as 'retain capacity' boroughs.</del>	Published London Plan (January 2021) no longer uses these categories.
N/A	Figure 5	[Update reference to: Redcorn Ltd, Brantwood Road / <del>Brantwood Auto Recycling Ltd</del> ]	PALOMA II (INDUSTRIAL IV) TRUSTEE I LIMITED

Reference	Section	Further modification	Representor
			
MM11	4.26	Rail and <del>water road</del> transport is particularly desirable when waste is travelling long distances.	Pinkham Way Alliance
MM13	New after Fig 8	Around <del>66%</del> <b>50%</b> of waste generated in North London is managed in North London, <del>and this rises to 66% if excluding excavation waste is excluded from the total</del> . The amounts of North London's waste managed within North London and elsewhere is set out in Table 4.	Pinkham Way Alliance
MM19	6.3 and Table 5	Targets for <u>North London's waste management</u> <del>managed within North London</del> 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 <u>taken from the draft new London Plan (December 2019)</u> are as follows:	Pinkham Way Alliance

Reference	Section	Further modification	Representor																					
		<p><b>Table 5: Recycling and Recovery Targets with 2016 Baseline</b></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</del> Contributing towards 65% recycling of municipal waste by 2030</td> <td><del>27</del>9%</td> </tr> <tr> <td>C&amp;I</td> <td><del>75% recycling by 2030</del> Contributing towards 65% recycling of municipal waste by 2030</td> <td><del>44</del>52%</td> </tr> <tr> <td>C&amp;D</td> <td>95% <u>reuse/recycling/recovery</u> by 2020</td> <td><del>93</del>50-60%</td> </tr> <tr> <td><u>Excavation</u></td> <td><u>95% beneficial use</u></td> <td><u>Not known</u></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><u>Hazardous</u></td> <td><u>Included in LACW, C&amp;I and C&amp;D targets</u></td> <td><u>N/A</u></td> </tr> </tbody> </table>	Waste stream	Target	2016 baseline	LACW	<del>50% recycling for LACW by 2025</del> Contributing towards 65% recycling of municipal waste by 2030	<del>27</del> 9%	C&I	<del>75% recycling by 2030</del> Contributing towards 65% recycling of municipal waste by 2030	<del>44</del> 52%	C&D	95% <u>reuse/recycling/recovery</u> by 2020	<del>93</del> 50-60%	<u>Excavation</u>	<u>95% beneficial use</u>	<u>Not known</u>	Biodegradable or recyclable waste	Zero biodegradable or recyclable waste to landfill by 2026	Not known	<u>Hazardous</u>	<u>Included in LACW, C&amp;I and C&amp;D targets</u>	<u>N/A</u>	
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MM23	New Table after 6.4	<del>Net self-sufficiency</del> Capacity options	Pinkham Way Alliance																					
MM23	New Table after 6.4	Options considered for forecasting North London's waste arisings and need	Pinkham Way Alliance																					
MM25	New below 6.6	[...] 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 2. The LACW figures in Table 8 are taken from the <a href="#">NLWP data study</a> 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 [footnote]. 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	Extinction Rebellion Zero Waste and Pinkham Way Alliance																					

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		<p>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>																																																																									
MM26	Table 8	<p>Table 8: Projected arisings and management of North London's waste 2020-2035</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> </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>	PWA and Extinction Rebellion Zero Waste
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Reference	Section	Further modification						Representor
		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>	
MM28	Table 3	Table 3: <del>Maximum Existing Annual Capacity at Licensed Operational Waste Management Facilities at the Start of the Plan Period</del> and a key dates following changes in sites capacities						Pinkham Way Alliance
		Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2012-2016						
MM32	8.6	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 also been built into the calculation						Pinkham Way Alliance

Reference	Section	Further modification	Representor
		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.	
MM35	8.12	[...] 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 <del>has commenced is expected to commence in the near term.</del> [...]	Dump Donoghue
MM46	8.20	<p>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 S18 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. <del>This is in line with policies in the NPPW and London Plan which direct new waste facilities towards industrial land.</del> However, in preparing the NLWP, the North London Boroughs have sought to <del>refine take</del> this approach <del>a stage further</del> and <del>identify</del> direct new waste facilities towards locations assessed and selected as the most suitable <del>land</del> in North London, <del>for a range of new waste facilities: which are identified as</del> “Priority Areas” in the Plan. The <del>proposed search</del> 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 [footnote], Planning Practice Guidance and the London Plan <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>[footnote] Following the introduction of the National Planning Policy for Waste NPPW in October 2014 to replace Planning Policy Statement <del>PPS10</del>, the site and area search criteria were reviewed to ensure compliance with this document.</p>	North London Waste Authority (NLWA) and Pinkham Way Alliance
MM58	7.9	The North London Waste Authority (NLWA) 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</del> 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	Extinction Rebellion Zero Waste and Pinkham Way Alliance

Reference	Section	Further modification	Representor
		<p>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. <del>The Authority and partner boroughs will continue to seek to maximise recycling levels for LACW. The North London Joint Waste Strategy, and this target, may be revised to bring it in line with the targets in the Mayor’s Environment Strategy of 50% LACW recycling by 2025, 50% household waste recycling by 2030 and 65% municipal waste recycling by 2030.</del></p>	
MM72	9.8	<p>During the Plan period, where waste sites shown in Schedule 1 are <del>redeveloped for other uses lost, but the amount and location of</del> compensatory provision <del>has been made and can be identified,</del> this will be noted in the NLWP AMR.</p>	
MM75	New after 9.10	<p>Some existing waste sites may be having an adverse impact on surrounding uses such as schools and residential areas. <del>Both the Boroughs and the Environment Agency have a role in ensuring that conditions of the environmental permit and planning permission are not breached.</del></p> <p>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.</p> <p>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</p>	Dump Donoghue



Reference	Section	Further modification	Representor
		<p>facilities with lower risk to the environment (which include “A2 installations” and “Part B installations”)<sup>1</sup>. Local authorities hold a register of these permits which are available to view on request.</p> <p>The responsibility for checking compliance falls to the issuer of the permit (the regulator). The <a href="#">Environmental Permitting Regulations</a> (EPR) place a duty on regulators to undertake appropriate periodic inspections of regulated facilities.</p> <p>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.</p> <p>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	Policy 2	<p>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.</p>	Pinkham Way Alliance

<sup>1</sup> Activities under each category is set out in Schedule 1 Part 2 of the [Environmental Permitting \(England and Wales\) Regulations 2016](#). Government guidance has been published for regulators of [Part A1 Permits](#) and [Part A2 and B Permits](#) which sets out their responsibilities.

Reference	Section	Further modification	Representor												
MM78	9.11	[...]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 <b>wishing to provide additional waste capacity on a new site in North London</b> 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. <b>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.</b> The exception to this <b>sequential approach to site search</b> 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). [...]	Henry Boot Developments												
AM	Table 9	<p><b>Table 9: Key to Waste Management Facility Type</b></p> <table border="1"> <thead> <tr> <th></th> <th>Facility type</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>Recycling</td> </tr> <tr> <td>B</td> <td>Composting (including indoor / in-vessel composting)</td> </tr> <tr> <td>C</td> <td>Integrated resource recovery facilities / resource parks</td> </tr> <tr> <td>D</td> <td>Waste <b>recovery or</b> treatment facility (including thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment)</td> </tr> <tr> <td>E</td> <td>Waste transfer</td> </tr> </tbody> </table>		Facility type	A	Recycling	B	Composting (including indoor / in-vessel composting)	C	Integrated resource recovery facilities / resource parks	D	Waste <b>recovery or</b> treatment facility (including thermal treatment, anaerobic digestion, pyrolysis / gasification, mechanical biological treatment)	E	Waste transfer	Extinction Rebellion Zero Waste
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E	Waste transfer														
MM85	9.24	[...] developers will need <b>to</b> demonstrate [...]													
MM94	9.42	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.	TfL Spatial Planning												
AM	9.43	Sustainable design, construction and operation of waste management development will be assessed against relevant <del>borough</del> <b>Local Development</b> Plan policies.	Extinction Rebellion Zero Waste												
MM105a	Schedule 1	Redcorn <del>Ltd, Brantwood Road / Brantwood Auto Recycling Ltd</del>	PALOMA II (INDUSTRIAL IV) TRUSTEE I LIMITED												

Reference	Section	Further modification	Representor
MM105a	Schedule 1	<p>[footnote to BAR3, BAR4, BAR6 and BAR7]</p> <p>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) <del>will be planned to</del> be replaced with a new facility <del>on site S01-BA</del> to meet the NLWA's requirements. Planning permission for <del>a new Waste Transfer Station (WTS) the new sites</del> at Geron Way was granted by Barnet Council <del>Planning Committee</del> 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 <del>has commenced is expected to commence in the near term</del>; 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 <del>and is currently not anticipated to be redeveloped until after 2026</del>. 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 <del>will would</del> need to be identified prior to its redevelopment and the London Borough of Barnet will seek to provide replacement capacity within the borough. <del>with</del> The <del>Barnet</del> Local Plan <del>will identify</del>ing potential sites.</p>	To ensure this is in line with 8.12
MM105b	HAR7	[Update site map in Waste Data Study 3: Appendix 4 Haringey: HAR7]	PALOMA II (INDUSTRIAL IV) TRUSTEE I LIMITED
MM109	Appendix 2: Hackney LLDC Area Profiles LLDC1-HC Bartrip Street	<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. <del>The site area would be suitable for the proposed "Less Vulnerable" developments. It is therefore considered that the site area should pass the sequential test.</del>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>[...] this will increase with the future <del>as a result of climate change</del> [...]</p>	Environment Agency

Reference	Section	Further modification	Representor
		<p>A <del>site specific</del> flood risk assessment would be required for any redevelopment. This will need to incorporate the <del>current following</del> climate change allowances <del>at the time of submission.</del><del>into the assessment:</del></p> <ul style="list-style-type: none"> <li><del>• Use central (25% increase from 2070 to 2115) for peak river flow</del></li> <li><del>• Use central (20% increase from 2070 to 2115) and upper end (40% increase from 2070 to 2115) for peak rainfall intensity.</del></li> </ul>	
MM110	Appendix 2: Hackney LLDC Area Profiles LLDC2-HC Chapman Road (Palace Close)	<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. <del>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 site area would be suitable for the proposed "Less Vulnerable" developments, h It is therefore considered that the site area should pass the sequential test.</del></p> <p>The exception test would not be applicable.</p> <p>[...] this will increase with the future <del>as a result of climate change</del> [...]</p> <p>A <del>site specific</del> flood risk assessment would be required for any redevelopment. This will need to incorporate the <del>current following</del> climate change allowances <del>at the time of submission.</del><del>into the assessment:</del></p> <ul style="list-style-type: none"> <li><del>• Use central (25% increase from 2070 to 2115) for peak river flow</del></li> <li><del>• Use central (20% increase from 2070 to 2115) and upper end (40% increase from 2070 to 2115) for peak rainfall intensity.</del></li> </ul>	Environment Agency
MM111	Appendix 2: Haringey Area Profiles A19-HR Brantwood Road	<p>The site area is largely Flood Zone 1 with the western most part of the site area falling partially within Flood Zone 2. <del>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 site area is considered suitable for the proposed "Less Vulnerable" developments. It is therefore considered that the site area should pass the sequential test. The exception test would not</del></p>	Environment Agency

Reference	Section	Further modification	Representor
		<p><del>be applicable. Note that the site area may also be suitable for “More Vulnerable” developments, as this would pass the sequential test.</del> The exception test would not be applicable.</p> <p>[...] this will increase with the future <del>as a result of climate change</del> [...]</p> <p>A <del>site specific</del> flood risk assessment would be required for any redevelopment. This will need to incorporate the <del>current following</del> climate change allowances <del>at the time of submission.</del><del>into the assessment:</del></p> <ul style="list-style-type: none"> <li><del>• Use central (25% increase from 2070 to 2115) for peak river flow</del></li> <li><del>• Use central (20% increase from 2070 to 2115) and upper end (40% increase from 2070 to 2115) for peak rainfall intensity.</del></li> </ul>	
MM113	Appendix 2:	<p>The Area is largely within Flood Zone 1 with a small area to the north of the site Area falling partially within Flood Zones 2 and 3. <del>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. It is considered that the site Area would be suitable for the proposed “Less Vulnerable” developments. The Area would pass the sequential test.</del> The exception test would not be applicable.</p> <p>[...] this will increase with the future <del>as a result of climate change</del> [...]</p> <p>A <del>site specific</del> flood risk assessment would be required for any redevelopment. This will need to incorporate the <del>current following</del> climate change allowances <del>at the time of submission.</del><del>into the assessment:</del></p> <ul style="list-style-type: none"> <li><del>• Use central (25% increase from 2070 to 2115) for peak river flow</del></li> <li><del>• Use central (20% increase from 2070 to 2115) and upper end (40% increase from 2070 to 2115) for peak rainfall intensity.</del></li> </ul>	Environment Agency
MM113	Appendix 2: Haringey Area Profiles	<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</p>	NLWA

Reference	Section	Further modification	Representor
	A22-HR Pinkham Way	<p>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>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 is most likely to be located would be better suited on land in the control of the NLWA to ensure deliverability. 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. <del>should be located in areas with the lowest risk of flooding.</del></p> <p><del>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.</del></p>	
MM113	Appendix 2: Haringey Area Profiles A22-HR Pinkham Way	<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 full consideration as site-specific development proposals are advanced.</p>	Pinkham Way Alliance
MM113	Appendix 2: Haringey Area Profiles A22-HR Pinkham Way	<p>Relevant Local Plan Policy</p> <p><del>The Area is subject to Local Plan policy SP8: Employment.</del></p> <p><del>Friern Barnet site</del> 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>	Pinkham Way Alliance

Reference	Section	Further modification	Representor
		<p><del>falls within the Borough's Specific Proposal 5, Employment generating uses subject to no adverse effect on the nature conservation value of the site Area.</del></p> <p><del>The area is subject to policy SP13: Open Space and Biodiversity.</del></p> <p><del>Friern Barnet is allocated as Borough Grade 1 SINC, and for employment uses in the Local Plan.</del></p>	
MM114	<p>Appendix 2: Waltham Forest Area Profiles</p> <p>A24-WF Argall Avenue</p>	<p>The site area falls partially within Flood Zone 1, Flood Zone 2 and Flood Zone 3. <del>It is considered that the site area would be suitable for the proposed "Less Vulnerable" developments and should pass the sequential test.</del> 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>[...] this will increase with the future as a result of climate change [...]</p> <p>A site specific flood risk assessment would be required for any redevelopment. This will need to incorporate the current following climate change allowances at the time of submission. <del>into the assessment:</del></p> <ul style="list-style-type: none"> <li><del>Use central (25% increase from 2070 to 2115) for peak river flow</del></li> <li><del>Use central (20% increase from 2070 to 2115) and upper end (40% increase from 2070 to 2115) for peak rainfall intensity.</del></li> </ul>	Environment Agency
MM115	<p>Appendix 2: Waltham Forest LLDC Area Profiles</p> <p>LLDC3-WF Temple Mill Lane</p>	<p>The site area is largely Flood Zone 2 with a small area of Flood Zone 3. <del>It is therefore considered that the site area would be suitable for the proposed "Less Vulnerable" developments and should pass the sequential test.</del> 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>[...] this will increase with the future as a result of climate change [...]</p>	Environment Agency

Reference	Section	Further modification	Representor
		<p>A <b>site specific</b> flood risk assessment would be required for any redevelopment. This will need to incorporate the <b>current following</b> climate change allowances <b>at the time of submission.<del>into the assessment:</del></b></p> <ul style="list-style-type: none"> <li>• <del>Use central (25% increase from 2070 to 2115) for peak river flow</del></li> <li>• <del>Use central (20% increase from 2070 to 2115) and upper end (40% increase from 2070 to 2115) for peak rainfall intensity.</del></li> </ul>	