

North London Waste Plan to 2035

Hearing Statement

B Soundness

Main Matter 2 – Aims and Objectives for waste development

Question 16



Abandoned mossy lamp posts – habitat for invertebrates

The Pinkham Way Alliance

Representor No 36

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Introduction

This Hearing Statement is submitted on behalf of the Pinkham Way Alliance (PWA).

Pinkham Way Alliance is a community campaign group which came together in early 2011 when residents living in the surrounding area of the Pinkham Way site became concerned about plans by the North London Waste Authority (NLWA) to develop the site for a large scale MBT waste facility.

Since then, PWA has taken an active interest in and has participated in the preparation of the original Submission version of the North London Waste Plan, the Haringey Local Plan: Strategic Policies document and the Haringey Site Allocations DPD, having made representations to and appeared at the examinations in public of all those plans.

1 Main Matter 2: Question 16

- 1.1 Is the aspiration for net self-sufficiency an appropriate strategy for all waste types, excluding excavation waste, and does the aim make it clear that this excludes excavation waste or should excavation waste be referred to in the aim/objectives?**
- 1.2 The determination of the appropriateness of a chosen strategy depends on a supportable option generation process and subsequently a fair and justifiable assessment of those reasonable alternate options when building towards its derivation. Main Matter 1, Qn 5 doubts the strategy development route followed by the NLWP.
- 1.3 The appropriateness of the NSS based strategy therefore stands to be challenged as being appropriate.
- 1.4 The London Plan seeks that, “the equivalent of 100 per cent of London’s waste should be managed within London (i.e. net self-sufficiency)”¹. The R19 NLWP mirrors that policy: “The North London Boroughs will identify sufficient capacity and land for the provision of waste facilities to manage the equivalent of 100% of waste arisings (net self-sufficiency)”². (*Author underlining*)
- 1.5 Following this path without the acknowledgement and management of the regional / sub regional interface, risks overprovision³.
- 1.6 The NLWP goes further than simply seeking to provide the equivalent of 100% of waste arisings:
- 1.6.1 where there is an identified capacity surplus for any sub-waste stream⁴, the plan acknowledges the position; AND
 - 1.6.2 conversely, where there is a gap identified in a sub-waste stream the plan seeks new land.
- 1.7 By banking surpluses while simultaneously seeking to fill gaps⁵, the aggregate result is inevitably one of planned capacity provision exceeding (forecast) arisings.
- (Representations R19 Representor Order eg 36.0 / 5&6/ 5.39 highlighted how this is in turn further amplified to generate additional land need via the micro sub segmentation of individual waste streams.)
- 1.8 The particular approach taken is particularly rooted in the assumption that a waste site, once identified for a particular waste management type, is invariant. It also fails to acknowledge (specialist) cross border flows exist and will continue. It further assumes that there is no opportunity to intensify existing sites.
- 1.9 If the assessment of all reasonable options - including for instance one targeting the apportionment (only) for those relevant waste streams (see later below) – ultimately concluded

¹ Draft London Plan July 2019 Policy S18 A1

² R19 NLWP Section 7 Strategic Policy for North London’s Waste

³ Representations R19 Representor Order 36.0 / 5&6/ 5.31 – 5.36

⁴ Representations R19 Representor Order 36.0 / 5&6/ 5.39

⁵ See eg Representations R19 Representor Order 36.0 / 5&6/ 5.55 – 5.56

NSS⁶ as the optimal way forward, then the equivalence position should be applied to the totality of waste, ie netting of gaps against surpluses, should be allowed in the determination of future capacity need⁷.

1.10 The approach is justifiable since eg planned exports such as landfill and specialist hazardous waste will, under the chosen NSS approach, be calculated as requiring equivalent facility within North London – but virtually rather than for the actually underlying purpose. There is no clear argument why this virtual requirement should not be netted off any other available capacity surplus rather than be taken as virgin land, which itself is not to be employed for the underlying purpose.

1.11 Duty to Cooperate Report August 2019 provides numerous examples within individual Statement of Common Ground, supportive of this axiom, eg Bedfordshire 7 and 18: “the unmet need ... is the type of facility rather than capacity”. Bedfordshire (amongst others) point 24 confirms the virtual rather than actual equivalence approach as the actual one.

1.12 As an example of the issue, and in extremis, to highlight the matter:

1.12.1 Consider three independent areas, each producing waste of 100, each with capacity of 100 but each specialising in the management of waste other than that produced within their own administrative border.

1.12.2 Reliance is on each other for waste management.

1.12.3 The system is in balance and fresh capacity needs of the system are nil.

1.13 However were each to follow the NSS path of the NLWP then an additional 300 fresh capacity would be identified as being needed, generating a total system capacity of 600, against a total underlying need of only 300.

1.14 To avoid substantive underutilisation of assets, imports from an external system would be required⁸, with unknown impact on those then-exporting areas, and raising inevitable questions over waste miles, relative productivity and more.

1.15 This is clearly a highly sub-optimal path, yet has been determined as the chosen strategic direction of the NLWP

2 Conclusion

2.1 A total North London capacity of 4.4m tpa⁹ compares very favourably with waste generated of only 2.9m tpa¹⁰, or 2.7m net of exports / imports, when looking to manage the equivalent of 100% of waste arisings. This represents surplus capacity at 66% of net arisings¹¹. Why, rather than how, such headroom should be further expanded as a strategic aspiration, is not outlined and it is certainly not explained why doing so represents an appropriate strategy, or is best option for land-stressed North London.

⁶ Footnote 6 to R19 NLWP SO3, “Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste generated in North London”

⁷ See eg Representations R19 Representor Order 36.0 / 5&6/ 5.68

⁸ See eg WDS Part 2 2019 5.32 for North London’s wider specialist role provision in metal recycling.

⁹ WDS 2019 Part 3 Table 8 (2018 figure)

¹⁰ R19 NLWP Table 2 (2016 figure)

¹¹ 2,861,062 Arisings less 1,201,964 Exports is 1,659,098 PLUS 1,000,000 Imports yields net arising of 2,659,098. Compared to capacity of 4,421,723 indicates gross capacity headroom of 1,762,625 or 66% of net arisings.

3 Suggested Approach

3.1 (At least) Two less land-hungry options are available:

- A. To apply NSS only to non –apportioned waste streams, and apportionment to HIC¹²; or
- B. To follow the NLWP chosen option but with the addition of netting identified capacity gaps against waste stream surpluses, as outlined above.

3.2 Assessing which, if either constitutes the superior option based on plan determined criteria would require a fair consultation alongside other reasonable options. Main Matter 1, Question / Answer 5, is therefore relevant

¹² Meeting NSS, for see Representations R19 Representor Order 36.0 / 5&6/5.150