

North London Waste Plan to 2035

Hearing Statement B Soundness

Main Matter 3 – Spatial Framework for Waste Question 23



Mining bee foraging on Pinkham Way 2011

**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.

PWA has approximately 3000 supporters

1 Question 23

Does the Spatial Framework adequately reflect the aim and objectives for waste development?

Response

- 1.1 Any logical flow through the NLWP supporting its organically developed approach from the underlying evidence base and its overall coherence should be transparently clear. It should emerge from the baseline of proportional evidence to encapsulate the aim and strategic objectives and through those to the Spatial Framework (SF) / spatial principles. (A clear flow should also encapsulate the Policies and monitoring arrangements which should not be left “free-standing”). Without it, the strategic appropriateness to proportionate evidence will not be proven.
- 1.2 The objectives include:
- reducing the movement of waste (SO 2); and
 - supporting the use of sustainable transport (SO7).
- 1.3 The Spatial Framework (seemingly being represented in the NLWP by six spatial principles A to F) supports:
- sustainable transport (SF F); while simultaneously
 - seeking a geographical spread of sites across north London (SF B); while also
 - encouraging the co-location of facilities (SF C).
- 1.4 It is unclear within the plan how, and whether, SF B plus SF C supports or are otherwise in conflict with SO 2.
- 1.5 SF B appears to be “free floating” versus any of the Strategic Objectives.
- 1.6 It is not evidenced whether SF B is linked to or sits independent of SO 7 / SF F.
- 1.7 SO 1, moving waste up the hierarchy, carries little if any supporting weight in the strategic framework outside of the potential but unspecified results from collocation (SF C).
- 1.8 How the plan has considered SF A (using existing sites) under SO 7 is not made clear.
- Site A22-HR (Friern Barnet Sewage Works/Pinkham Way) for instance:
 - has no prospect of supporting sustainable transport (and hence being in line with SO7 and SF F),
 - as a virgin site it would risk conflicting with SF A (make use of existing sites) if SF C (co-locating facilities) were to be followed and so require the closure / transfer from an existing site(s).
 - Moreover, SF E (protecting amenity) and also SO 8 (environmental protection) would doubtless conflict with plan’s aim (right place), given its proven role as a SINC.

2. Conclusion

- 2.1 A clearly evidenced pathway from the plan's aim, through the strategic objectives and to the strategic framework / strategic principles, ultimately linked to Policies and monitoring metrics, is not obvious and no evidence is presented as to where and then how balancing conflict (such as highlighted in the A22-HR example above) may occur nor how that would be addressed.

Suggested Approach

- 2.2 The NLWP includes a mapping showing a clear route-way from aim, through strategic objectives, strategic framework / principles and ultimately to the Policies and monitoring arrangements such that there can be no doubt where lines of supporting coherence (and no-support) lies from the bottom to the top of the plan for each key element.
- 2.3 Conflict risks eg using existing sites but simultaneously targeting co-location, should be clearly highlighted and via Policy require clarifying balancing analysis in any development decision.