

# North London Waste Plan to 2035

## Hearing Statement

### B: Soundness

#### Main Matter 3 – Spatial Framework for Waste

#### Question 25



**Cinnabar moths on Pinkham Way**  
**Classified as a Priority Species in the UK BAP**

**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 25

### Should any reference be made to the waste forecasts and methodology used in the emerging new London Plan?

- 1.1 The NLWP concluded that the draft London Plan's LACW waste forecast was incorrect in not adequately reflecting future economic and population growth expectations.<sup>1</sup> The alternative source has a high level of probability that it doesn't reflect objectively assessed needs.
- 1.2 In the light of the already questionable accuracy of the independently sourced forecasts for LACW very early in the term,<sup>2</sup> as well as their author's own high level of caution,<sup>3</sup> a clearer rationale for employing that data rather than that of the emerging London Plan would appear warranted.
- 1.3 MM1 Q 5 Appendix 2 highlights the acknowledgement of an established reducing trend by the NLWA and partner boroughs rather than the NLWP's assumption of expecting growth.
- 1.4 Options Appraisal January 2019 3.7 points out the alignment of Minimised Growth with the draft London Plan, before going on to see it as non-credible (3.8).
- 1.5 This assertion can be contrasted with the comparing of actual / actual trend line to the Eunomia / NLWA source forecast data for LACW used by the NLWP from a 2009 commencement. (See MM3 q /a 25 Appendix 1.) The ~300,000 tpa discrepancy does not suggest a strong evidence base.
- 1.6 As a minimum, the chosen LACW forecast methodology should be rebased to the latest actuals then struck forward. Continuation of the current gradient does not stand against the proportionate evidence to the contrary and warrants a trajectory rethink.
- 1.7 Rerunning the model, as outlined in MM3 Q 24, based on a lower expectation to determine (any) changes to the 9h land requirement would be appropriate to ensure the use of proportionate evidence.

## Conclusion

The decision to use non-London Plan forecast does appear to be without the high level of credibility the alternate was promoted with. A reversion to the consistent, London wide approach may now be warranted.

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<sup>1</sup> Options Appraisal January 2019 3.7

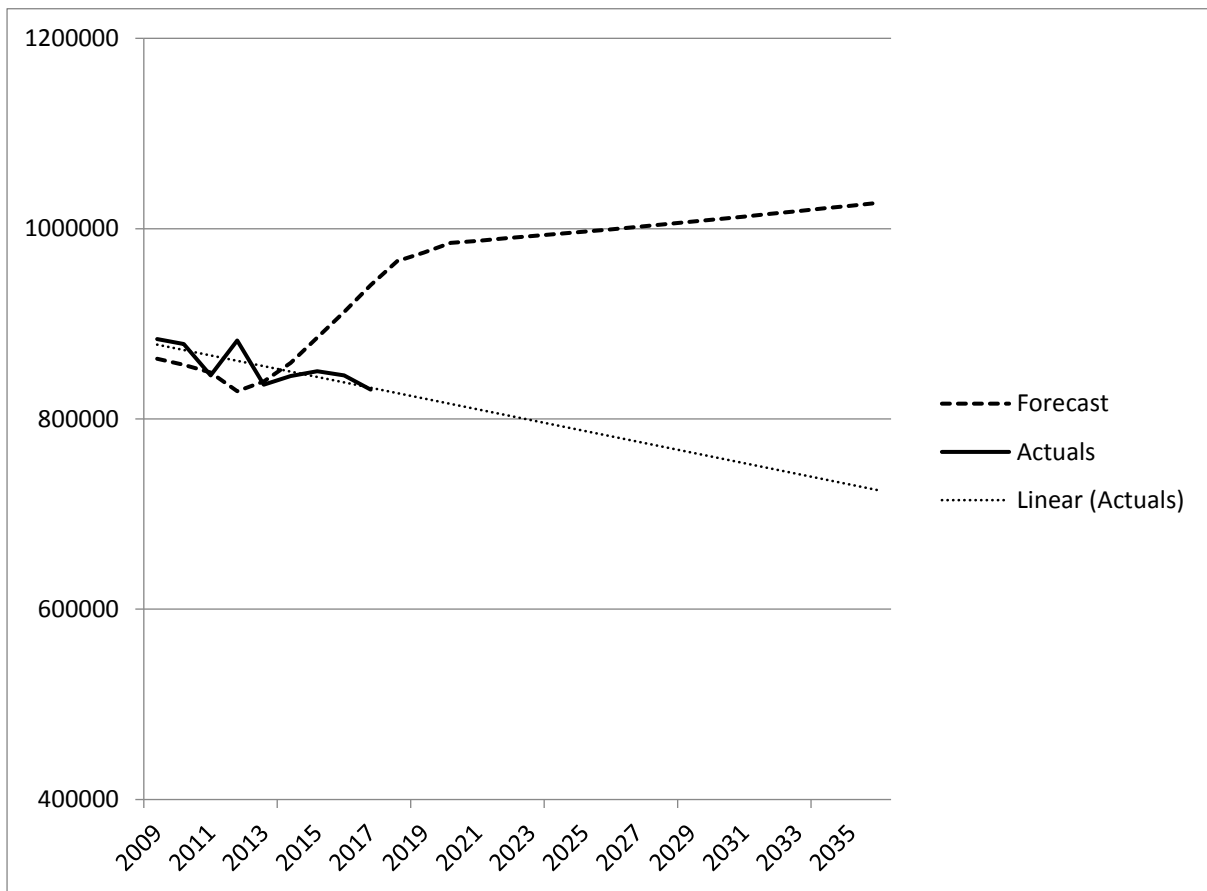
<sup>2</sup> Representations R19 Representor Order 5.174

<sup>3</sup> Representations R19 Representor Order 5.176

# MM3 Q 25 – Appendix 5

## Chart - NLWP LACW forecasts vs actuals

The LACW forecasts used in the R19 NLWP, being based on a Eunomia exercise for the NLWA, may well have past their usefulness and a reversion to London Plan basis now appears supportable.



Source:

Eunomia for NLWA Spreadsheet of forecasts Ver 8

NLWA AMR data various annual reports 2009/10 – 2017/18

WDS Part 1 2019 Table E1 and Table 13

Trend line – linear format, automatically calculated by application algorithm