

North London Waste Plan to 2035

Hearing Statement

Main Matter 3 – Spatial Framework for Waste Question 26



Sleeping bee on Pinkham Way

**The Pinkham Way Alliance
Representor No 36**

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 26

Does the methodology/assessments utilise the latest data and could there be any 'over-inflation' in the outputs from the methodology? In particular, if Table 3 and paragraph 5.6 identify surplus capacity, and the same paragraph also refers to North London as being a net exporter, could there be an argument that the proposals for future waste facilities would result in over provision? If not, should there be more detailed explanation as to why this is not the case?

- 1.1 Linking latest data and inflationary risk can be highlighted by a brief analysis of the LACW forecasts (prepared by Eunomia for the NLWA and used by the NLWP).
- 1.2 Drawing from WDS Part 1 2019 Table E1 and Table 13 and then filling in the detail assumed from the missing Appendix 3 – see para 3.5 and Contents page - by utilising the base Eunomia model, reveals, when compared to AMR actuals, discrepancies reaching 58% and a divergence from actuals of 110,000 tonnes / 13% in a single year as early as year two.
- 1.3 The position is shown as MM3 Q 26 Appendix 6.
- 1.4 With the established trend for LACW reducing (MM3 Q 25 Appendix 5) and the gradient for Eunomia being positive, this significant difference will only increase further, making the prospect of LACW linked capacity / land requirements substantially greater than any true need (if then any).
- 1.5 It is difficult to see how the forecast being employed are not only over-inflating the output land requirement but are now so far out of line and likely moving forward with the wrong gradient, that their use as proportionate evidence will be difficult to justify.

MM3 Q 26 – Appendix 6

NLWP LACW forecasts only reconcilable using outside data

PWA MM3 Qn 26 Appendix 6

LACW forecast reconciliation is not possible without using data not presented as part of the NLWP but when undertaken significant differences in approach and outturn are evident.

	ACTUALS NLWA AMR 2016/17	FORECAST Eunomia 2016/17	Difference	Percent
Household	698277	687667		
NLWA direct collection		12124		
<u>sub total</u>	<u>698277</u>	<u>699791</u>	1,514	0%
Non Household	147499			
LAC C&I		166385		
Other, eg fly tip, street cleaning		46319		
<u>sub total</u>	<u>147499</u>	<u>212704</u>	65,205	44%
Total LACW	845776	912495	66,719	8%

	ACTUALS NLWA AMR 2017/18	FORECAST Eunomia 2017/18	Difference	Percent
Household	683172	695562		
NLWA direct collection		12265		
<u>sub total</u>	<u>683172</u>	<u>707827</u>	24,655	4%
Non Household	147653			
LAC C&I		186515		
Other, eg fly tip, street cleaning		46319		
<u>sub total</u>	<u>147653</u>	<u>232834</u>	85,181	58%
Total LACW	830825	940661	109,836	13%