

North London Waste Plan to 2035

Hearing Statement B Soundness

Main Matter 3 – Spatial Framework for Waste Question 34



*Green woodpecker – identified and breeding on Pinkham Way.



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 34

Is paragraph 5.13 clear as to why the Circular Economy Package recycling target of 65% for municipal waste (LACW and C&I) by 2030 has only been applied to C&I waste in the Plan? Is the effect of this target clearly identified in the Plan, or reasons as to why it has no effect clear? Does this target have any effect on the data contained within tables 6 to 9?

- 1.1 The NLWP would appear to fail to achieve this key target altogether, suggesting an unjustified plan. In preparing a plan capable of meeting the target, the implications for plan outputs / targets, eg Table 7 and NSS, should be made clear. (See our response to MM3 Q 24 in this regard).
- 1.2 Despite the established 2020 LACW recycling target of 50%¹, a poor 2016 baseline figure of 29%² rising to only 30% in 2018/19, results in the NLWP's deferring its achievement (to 2025³). The public expectation from the NLWA is however never expected to exceed 43%, well below the Mayors 65% minimum ambition⁴. See MM3 Q 34 Appendix 7.
- 1.3 Neither is the NLWP achieving the Circular Economy Package HIC recycling target of 65% at any stage (see MM3 Q 34 Appendix 8, even assuming a 50% LACW recycling rather than the projected 43%).
- 1.4 Both failures do not meet the objectively assessed needs of the area.
- 1.5 Why no progress is planned, or expected, from a static 61/62% is not identified / assessed.
- 1.6 What would be required to achieve the 65% target, when that could occur, with what changes, with what implications for import / export levels and NSS are not evidenced.
- 1.7 The input / output tabulated approach suggested in MM3 Q 24 would have immediately revealed these expectations of plan failure.
- 1.8 The invariant nature of LACW recycling expectation plan stands as a weakness. The result does not fit with the chosen option "maximise recycling in line with the targets." ⁵ instead appears to be the, discounted, "maintain the status quo" approach.

¹ R19 NLWP 7.9

² R19 NLWP Table 5 (5.10 indicates it increasing to 32% in the subsequent year.)

³ R19 NLWP Table 5

⁴ See also WDS 2019 Part 2 Table 3 confirming this order of expectation

⁵ R19 NLWP 6.4

2. Conclusion

- 2.1 The strategy, or perhaps the chosen option / its underlying forecasts, fails to meet the areas objectively assessed needs.

Suggested Approach

- 2.2 It is unclear from the evidence whether the issue lies with management ability or ambition; whether a cap below draft London Plan requirements has been determined as the areas maximum recycling potential; waste supporting processes; or various other potential factors.
- 2.3 An approved plan needs to be seen as having a strategy capable of achieving its key targets. This one apparently fails.
- 2.4 Rectification at this stage should draw on suggestions contained variously throughout the Main Matter answers from PWA, including:
- (i) Correctly assess the spectrum of available options to determine the appropriate strategic approach;
 - (ii) Re-run the NLWP's core model, taking into account the wide range of forecasting and site data changes brought forward;
 - (iii) Ensure allowance is made for site intensification;
 - (iv) Generate a consolidated output format;
 - (v) Risk assess for possible dampening factors; and
 - (vi) Iterate and reappraise until it is evident the plan will meet its required targets.

MM3 Q 34 – Appendix 7

Failure to reach LACW recycling targets

The public presentation is an expectation of failing to meet the 43% LACW recycling target, never mind the Mayors higher ambition of at least 65%

	2018	2021	2026	2031	2036		2050
"Household Waste"							
Recycling		418,169	424,049				457,185
Residual		566,872	572,856				611,277
Total		985,041	996,905				1,068,462
calculated:-							
Total recycled %		42.5%	42.5%				42.8%

<http://northlondonheatandpower.london/faqs/future-proofing/is-it-big-enough-to-meet-current-and-future-waste-needs/>

(Source date: October 2019. Note that the Total figure is in line with equivalent figures in both WDS Part 1 Table 15 and WDS Part 2 Table 33.)

What is a supportable target, what is a reasonable expectation for LACW recycling in North London, and how that in turn impacts on crucial data contained within the plan, especially land need, import / export levels and the NSS ambition, needs to be clarified for the present position reveals a failure to meet the area's objectively assessed needs.

MM3 Q 34 – Appendix 8

Failure to reach Mayor’s recycling targets

NLWP figures indicate a failure to meet the Mayor’s requirement of a minimum 65% recycling even though the NLWP assumes a higher 75% C&I recycling figure to help with the anticipated LACW recycling failure versus its sole target

	2018	2021	2026	2031	2036
Source data:-					
WDI	774768	793855	826716	860937	889332
LACW	940781	987205	997425	1012688	1026176
Total HIC	1715549	1781060	1824141	1873625	1915508
Calculated:-					
WDI recycled at 75%	581076	595391	620037	645703	666999
LACW recycled at 50%	470391	493603	498713	506344	513088
Total recycled	1051467	1088994	1118750	1152047	1180087
Total recycled %	61.3%	61.1%	61.3%	61.5%	61.6%

Data Source: WDS Part 2 2019 Table 15
 Maximum Recycling / Maximum Growth WDI

(Highest recycling target levels shown beneficially from the onset in the above calculation, rather than as mid-term targets.)