

# **North London Waste Plan to 2035**

## **Hearing Statement B Soundness**

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

#### **Question 43**



**Non wooded area on Pinkham Way**

**The Pinkham Way Alliance  
Representor No 36**

# Contents

---

1.	Introduction	
2.	Main Matter 3: Question 43	2
3.	Conclusion	4

---

## 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 43

**Is it clear that the Spatial Framework appropriately reflects the relationship between existing population and population growth and future infrastructure provision in relation to likely future waste generation and the need for new facilities?**

- 1.1 NLWP contains no proportionate evidence where waste streams currently originate, or where they are expected to originate from. How plan factors eg potential site locations or sustainable transport routes, link to actual waste sources cannot then be determined, making the chosen strategy unproven as appropriate.
- 1.2 The Spatial Framework, represented in the plan by spatial principles, includes “seek a geographical spread of waste sites across North London”<sup>1</sup>.
- 1.3 The ~98h of Industrial Land sites were identified on a what-is-available basis rather than the pro-active use of some identification methodology to optimise across what are potentially contradictory strategic objectives and elements of the strategic framework, ie it was chance.
- 1.4 R19 NLWP Figure 9 represents the current geographic spread. What might constitute an (improved) equitable<sup>2</sup> better<sup>3</sup> balanced<sup>4</sup> increased<sup>5</sup> geographic spread from this geographic spread, and why, is not evidenced<sup>6</sup>. Cllr Joseph Ejiofor, Leader of Haringey Council and Cabinet Member for Planning subsequently introduced a further intent to this smorgasbord: “fairness”<sup>7</sup>. There are others<sup>8</sup> all combining to undermine any semblance of robustness.
- 1.5 Arguing against any artificially manufactured spread of sites includes:
  - History<sup>9</sup>;
  - Market forces;
  - The residential population of North London is spread across the majority of the area yet a single site has been planned to manage all residual waste;
  - The same single site is slated to manage residual C&I waste;

---

<sup>1</sup> R19 NLWP 4B

<sup>2</sup> R19 NLWP 4.11

<sup>3</sup> R19 NLWP 8.25

<sup>4</sup> R19 NLWP 9.24

<sup>5</sup> R19 NLWP Policy 1

<sup>6</sup> Representations R19 Representor Order 36.0 / 4 / All / Variously 6 – 6.75

<sup>7</sup> [www.haringey.gov.uk/planning-and-building-control/planning/major-projects-and-regeneration/pinkham-way-2019](http://www.haringey.gov.uk/planning-and-building-control/planning/major-projects-and-regeneration/pinkham-way-2019)

<sup>8</sup> “even” (R19 NLWP 4.7); “extend the existing” (4.12); “improve the spread” (4.12); and “better, by reducing the number of sites in Enfield” (8.25)

<sup>9</sup> R19 NLWP 4.7

- C&D waste management is ideally undertaken in situ, a varying location determined by underlying construction activity; while
  - Excavation waste location will be determined by varying construction linked activities and then managed, utilised or exported, depending on its own unique circumstances.
- 1.6 Specifically how SF B, the drive for a different geographical spread of sites, and more particularly its apparent manifestation through an equitable, better, balanced and increased spread of sites sits relative to waste generation from such an underlying spread of population, population growth, independent waste-market conditions, current and future commerce and industry locations and future infrastructure, is not evidenced<sup>10</sup>.
- 1.7 How SF B (geographical spread) in turn supports or otherwise needs to be balanced with:
- SO 2, reducing the movement of waste
  - SO 7, supporting sustainable transport
  - SF A, making use of existing sites
  - SF C, encouraging co-location
- 1.8 Is not clear; while in cases it could be seen to conflict with, eg:
- SO 2 reducing the movement of waste;
  - SF A making use of existing sites; and / or
  - SF C encouraging colocation.
- 1.9 SF B (geographical spread) is noticeably absent in having any footprint in either the objectives of the SA or their assessment criteria<sup>11</sup>.
- 1.10 Geographic spread in any form is excluded as a site selection criteria<sup>12</sup>.

---

<sup>10</sup> See eg Representations R19 Representor Order 36.0 / 4 / All / 6.49

<sup>11</sup> SA January 2019 Table 6

<sup>12</sup> R19 NLWP Table 10

## 2. Conclusion

- 2.1 A geographical spread of RRC's to help ensure the maximum number of households within distance of a site appears valid<sup>13</sup>, but its applicability to other forms of waste site does not align with any strategic objective, has no footprint with the SA or its linked objectives, and there is no means to assist with supporting the aim of what constitutes the "right place".

### **Suggested Approach**

- 2.2 SF B, the desire to seek a different geographic spread of (non RRC) waste sites across North London has no clear rationale or evidenced benefit to the plan. It should be removed, without loss.
- 2.3 Propose consideration of a Main Modification to remove from paragraph 4.4 of the NLWP Spatial Principle B. Seek a geographical spread of waste sites across North London, consistent with the principles of sustainable development.

---

<sup>13</sup> R19 NLWP 4.13