

North London Waste Plan to 2035

Hearing Statement

B Soundness

Main Matter 6 – Monitoring and Implementation

Question 88



Shield bug 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 88

How do the monitoring arrangements provide for a demonstration that waste is being transported sustainably? Should the concept of 'waste miles' be considered and any targets set/monitored for waste transport other than by road?

A correlation to waste miles undertaken is evident in many of the core building blocks of the NLWP:

Aim of the NLWP

- “..support a greener London...”

Strategic Objectives (SO) of the NLWP

- SO 2, “... reduce the movements of waste”
- SO 3, “... manage as much as practicable of North London’s waste within the plan area”
- SO 5 “... the integration of social, environmental and economic consideration”
- SO 6, “... contribute to the development of a low carbon economy”
- SO 7, “... support the use of sustainable forms of transport and minimise the impacts of waste movements including on climate change”
- SO 8, “... protect ... North London’s natural environment, biodiversity”

Spatial Principles (SF) of the NLWP

- SF C “... encourage co-location of facilities”
- SF F “... support sustainable modes of transport”

and in many of these cases there is a link to waste miles undertaken sustainably. In two cases (SO 7 and SF F) there is a direct correlation to waste miles undertaken sustainably.

SF B, to “seek a geographic spread of waste sites across North London” has the potential to be (sustainable) waste miles positive, or conversely, waste miles negative. Without the tracking of the underlying metric any decision would necessarily be taken blind and hence its impact(s) – positive or negative – on several SO’s and SF’s would be unproven (unprovable).

The evidencing of the overall success of Policy 5 of the NLWP, as well as its potential on any single site proposal, would be supported by (sustainable) waste mile monitoring

- g) active consideration has been given to the transportation of waste by modes other than road, principally by water and rail;

- h) there are no significant adverse transport effects outside or inside the site as a result of the development;

SO 2 (waste movement reduction) and SF C (co-location) should, if undertaken positively, yield a mutually reinforcing positive waste miles position. However they might not if, for example SF A (existing sites) is followed, or conversely, not followed. Only measurement could reveal which is favourable to the intent.

In our rapidly evolving climate change decision-driven world it is a reasonable probability that carbon monitoring will be required in some form during the term of the plan ; anticipating that position would be a positive step for the NLWP. Such a monitoring approach would provide a suitable base from which to better plan for adaption and mitigation requirements linked to climate change over the term.

The draft London Plan requires monitoring of waste movements. It should be a small step to delineate this between its sustainable and non-sustainable elements.

Conclusion

Without a means of measuring the current position, and thereafter any planned and actual changes to the evolving plan, the direct impact and secondary impact of (sustainable) waste miles and how they affect the core building blocks of the NLWP will not be known. Decisions cannot then be fully justified, being not being based on proportionate evidence.

When monitoring waste miles the opportunity should be taken to differentiate between those taken sustainably and those not.

The metric would be a powerful addition to the wider understanding of the NSS ambition as it impacts on exports and imports.