

PINKHAM WAY ALLIANCE

**SUBMISSIONS TO THE
EXAMINATION IN PUBLIC
OF THE
NORTH LONDON WASTE PLAN**

MAY 10TH 2012

**MAIN MATTER 3
SPATIAL STRATEGY**

**MAIN MATTER 5
NLWP POLICIES 2 & 4**

Main Matter 3 (Spatial Strategy) and Main Matter 5 (Policy NLWP 2 & 4)

The extent to which existing facilities (Schedules A and B) and Edmonton EcoPark could manage the predicted arisings

1. The allocation of the PW site and the associated loss of open space and biodiversity could be avoided by the simple expedient of allocating sufficient land to meet needs until the expiry of the Plan period in 2027, even with “some extra provision to allow for contingency and other wastes”¹. This would be entirely consistent with PPS10, which states that the strategy for waste management should look forward for a fifteen to twenty year period. However as noted in PWA’s previous submissions, paragraph 7 of the NLWP reveals the real reason for the allocation of new sites, namely “to meet longer term needs of the North London Waste Authority for the management of municipal waste until 2041” i.e. for a period of nearly 30 years.
2. It is quite clear that no proper or adequate consideration has been given to the above alternative. On the contrary, the development of the PW site is treated as a foregone conclusion: see, for example, para. 7 of the Executive Summary which states that “the capacity gap in 2027 is 171,994 tonnes after taking account of planned new waste facilities”; and paragraph 2.24 of the Technical Report which explains that the surplus capacity gap in 2016 is “due to an additional 900,000 tonnes of treatment capacity available for the treatment of municipal waste as a result of the NLWA PFI procurement”.
3. For the reasons explored in respect of Main Matter 2, the allocation of sufficient sites to meet needs up to, but not beyond, the Plan period is a reasonable and realistic alternative because the additional capacity of 900,000 tpa is not required to meet even the London Plan apportionment figures. The London Plan apportionment up to 2027 can be met through the sites in Schedules A and B, *even assuming* that the EfW plant at the Edmonton EcoPark is decommissioned with a loss of 510,000 tpa.

¹ SA, Option 1.3

4. Moreover even if the EfW plant is decommissioned in 2020, the whole of the Edmonton EcoPark (15.26 hectares) is safeguarded for waste uses during the plan period. Table 5-10 of the Technical Report does not explain why the land that is used for in vessel composting and clinical waste transfer currently included in the land availability assessment has been discounted from the future land take calculation. However even assuming that only 9.75 hectares of land is available during the plan period, table 6-2 demonstrates that, as at 2026, there is a *vast* surplus of 25.02 hectares of land, with a need for just 4 hectares. Even discounting the 9 hectares available from new sites, this results in a surplus of some 16.02 hectares when compared to need.
5. Paragraph 6.4 of the Technical Report February 2012 acknowledges that this is a larger area of land than is in fact required. However Table 6-3 establishes a “worst case scenario” where the NLWA fails to procure a new long-term contract with 900,000 tpa of treatment capacity, and where the Edmonton EfW is decommissioned. In those circumstances, it is said, the surplus of land would be just 7.73 hectares, which, on the NLWP throughput figures equates to 377,000 tpa based on their own 50,000 tpa per hectare figure.
6. Even discounting the acknowledgement, in paragraph 6.6, that this scenario is not in fact realistic, this “worst case scenario” is also premised on the flawed baseline capacity figure of 1,387,235. And even on that (unrealistic) basis, and even excluding the Schedule C sites and the remaining 6 hectares of land which have been safeguarded at the Edmonton EcoPark, the shortfall in land take at the tail end of the plan period is just 1.5 hectares.

Whether a wider spread of smaller sites should be preferred rather than the concentration on a smaller number of larger sites

7. The preferred option was for a hybrid of sub-regional clusters of larger sites, perhaps with multiple facilities, combined with a larger number of smaller sites supplying waste to these sites or bulking recyclables for onward movement. This “hybrid” option acknowledges the environmental, human health and social problems associated with siting large plants in built up urban areas.

8. The proposed allocation of two large “centralised” sites in Schedule C is inconsistent with this preferred option. However the preferred option *would* be satisfied by continuing to rely on the Schedule A and Schedule B sites, including Edmonton EcoPark. Absent any sound evidence that the PW site is required to meet apportionment up to the expiry of the Plan period, this option is plainly both realistic and reasonable.

Whether criteria-based policies should be used in the Plan rather than the allocation of specific sites/ Adequacy of NLWP 4 criteria

9. As noted in PWA’s original submission at paragraph 28, it is not correct that the criteria used to select Schedule C sites are the same as the criteria used in NLWP 2: both the choice and the weighting of the NLWP 2 criteria are clearly more stringent, such that their use would have excluded the PW site from further consideration if these criteria had been used.
10. The upshot of this discrepancy is that whereas development on non-allocated sites is conditional on satisfying the “absolute” criteria contained in Policy NLWP 2, including that “the site is not within metropolitan land, green belt or land with a local environmental designation” and that “the site has no adverse impact on local amenity”, the only protection afforded to the two Schedule C sites is that contained in Policy NLWP 4, which applies equally to the replacement or expansion of existing sites. As paragraph 7.13 notes, the purpose of Policy NLWP 4 is to ensure that local amenity “is protected and enhanced *as far as is practicable*”. Thus, Policy NLWP 4 is concerned with *mitigation* rather than *prevention* of adverse environmental and other impacts.
11. Given that evidence as to deliverability will inevitably change over the course of the Plan period, PWA therefore contends that the use of criteria-based policies rather than specific site allocations represents a more flexible and sustainable alternative to the allocation of this environmentally- sensitive site, especially in circumstances where the *only* rationale for its allocation is its perceived deliverability².

² See Table 5-5 of the Technical Report 2012

12. Moreover even if the principle of allocation of specific sites is accepted, the criteria in Policy NLWP 4 are plainly insufficient to protect the site's Grade 1 SINC status or its formal open space designation from a development proposal of this scale. Consequently, *as a bare minimum*, PWA contends that Policy NLWP 4 should be amended to reflect the criteria for non-allocated sites in NLWP 2 as well as the locational criteria currently contained in Policy NLWP 4 (specifically as to air quality and other emissions).