



THE NEW NORTH LONDON WASTE PLAN

SUBMISSION FROM

PINKHAM WAY ALLIANCE

JUNE 2013

The Pinkham Way Alliance welcomes the opportunity to offer some thoughts on the preparation of a new Waste Plan for North London.

THE PREVIOUS PLAN – is it a good starting point?

The Councils are right in saying that the plan's evidence was never tested. Naturally they would have 'believed it to be sound' – how could they propose it otherwise? However, they will know that it was vigorously and broadly challenged from many quarters. In PWA's opinion, they are taking the formality of the opening statement at a public examination – ie that a plan is taken to be sound, and that it is for the objectors to show otherwise – and using it wrongly as the basis for an assertion that the previous plan is, in fact, objectively sound.

PWA notes the Councils' intention to take into account the objections made to the previous plan. If this is done within a remaining intention to base the new plan on previous information, PWA contends that this will end in both councils and responders spending more time arriving at a sound starting point. It is much more productive to restart the process.

Furthermore all participants now have a much deeper knowledge of the issues. The Councils can use this bonus well of knowledge to their advantage in constructing a broad, forward-looking and accessible plan that takes into account the breadth and complexity of waste issues that simply had not arisen only a few years ago. PWA would welcome the chance to participate in this way.

THE CONTENT – the changing background and the Waste Hierarchy

The plan should have at its heart two interconnected themes: the changed background and attitudes to waste, and the Waste Hierarchy.

Over the last few years waste, for the first time, has been declining. In the previous plan this was ascribed simply to the economic downturn. Yet the desire to decouple waste from economic activity had been government policy for years, and, during 2000-2007, total household spend had risen by just over 25% while waste remained virtually flat. This did not appear to be noticed by the previous plan. WRAP appears to support the thesis of decoupling. After looking at statistics from 2000, the report states on Page 3 that

Household waste appears to be reducing irrespective of trends in income and expenditure, suggesting that it can be done in a way that does not harm the economy.

Yet the Councils, in their submission for Main Matter 2 at the 2012 EiP, offered only the following opinion, unsupported by evidence:

It is expected that a more normal pattern of growth in the waste stream will resume in the near future

This reasoning might have been sound around 25 years ago, and was actually relied upon in correspondence by the Chair of the NLWA, until shortly before the Authority's announcement last December that falling waste meant that it only needed a single MBT. With the background of the EU Roadmap for Resource Efficiency 2050, and the increasing traction of the concept of the circular economy and closed loop recycling etc, it is in PWA's opinion inadequate.

The Roadmap sets shorter term Milestones for 2020. That for Waste says:

"By 2020, waste is managed as a resource. Waste generated per capita is in absolute decline. Recycling and re-use of waste are economically attractive options for public and private actors due to widespread separate collection and the development of functional markets for secondary raw materials. More materials, including materials having a significant impact on the environment and critical raw materials, are recycled."

This Milestone is a good starting point. Over the 10-15 year life of the next plan, recycling will rise and residual waste fall. If they form the next government, the Labour party is talking about raising the English recycling level to match the 70% target for 2025 in Scotland and Wales. English targets will only rise. (The Milestone also mentions separate collection. In relation to this, PWA is aware of the stated benefits of commingling, but is of the view that a realistic long term solution would involve some form of hybrid collection system, which deals separately with glass and plastics.)

DEFRA is no longer the sole authority on matters concerning waste. To gain a broader view of the long term, PWA feels it essential that the Councils seek opinions from business (perhaps Mike Barry, Head of Sustainable Business at M&S, or Mike Walters of John Lewis Partnership), academics (perhaps Dr Andy Tubb of the University of West of England, who spoke at the recent Haringey Council debate on waste) and independent observers (perhaps someone such as David Fell of the consultancy which specialises in sustainable development, Brook Lyndhurst).

Although the Waste Hierarchy was mentioned in the previous plan, there was no analysis of its importance or the plans for its implementation. Now, it should be at the centre.

PWA notes the discussion of the Hierarchy in some of the literature of the South London Waste Plan and the Greater Manchester Plan, which seem to have been written with accessibility for lay people in mind.

Explanations are given, and steps are suggested which residents can take themselves. The N London Councils need to take the lead, and to use the interest generated by the Pinkham Way issue to keep waste strategy in the public mind; this means much clearer format and language, which would be warmly welcomed by residents.

The plan needs to have a clearly defined period. With the NLWA attempting to procure a 25-35 year contract – and the requirement to take NLWA needs into account – PWA recognises the problem this causes for the planners. However, the last plan appeared to have been distorted to accommodate and provide rationalisation for NLWA decisions already made, decisions, incidentally, that the PWA has long argued were highly unsuitable at a time of such uncertainty and fluidity in waste. This internal conflict was highlighted by the consultancy Environ on Page 3 of its report on the NLWP, submitted by PWA to the 2012 EiP as Appendix 1, and submitted with this response:

The assumption that the NLWA's strategy for long term waste management will be realised – and the associated use of its resulting waste capacity estimates – fundamentally undermines the NLWP. The NLWA is the Authority with responsibility for managing the waste arising from the North London boroughs. Therefore it is to be expected that the NLWA would have had some influence on the approach adopted in the NLWP.

The realisation of the NLWA's proposals should be dependent upon the adoption of the NLWP – it is only through the framework of the NLWP that new sites should be identified and developed for waste management use. The NLWP's assumption that these proposals will be realised – in the very document designed to test the justification of such proposals – is considered to be highly questionable.

PWA notes that the new plan should be adopted during 2016. Thus, illogically, three quarters of the life of the Joint Waste Strategy on which it is supposed to be based will be over. By way of illustration of the present strategy's irrelevance, the very first paragraph makes a statement about waste growth that was already 10 years out of date when the NLJWS was published in 2009. It is a sign of the inertia surrounding waste policy that successive Annual Monitoring Reports have not bothered to amend this:

In North London, the weight of rubbish collected has been increasing at a rate of approximately 3% each year. This means that in the next 20 years, unless we change what we do, the amount of rubbish we produce will increase by 66%.

Furthermore, if the NLWA manages to award its contracts in 2013, the lack of synchronicity with NLWA procurement, mentioned as a concern several times in the Planning Officer Group meeting minutes, will, as far as PWA can see, not be resolved until the contracts conclude in the 2040s. Given the wholesale change in waste markets, and the prospect for continuing change, surely now is the time for the Councils to use what influence they have with the NLWA to argue strongly for a fresh, more flexible and more relevant strategy.

EXISTING WASTE SITES

Existing sites should be intensified if at all possible. With the balance changing between recycling and residual waste, re-orientation of smaller sites to deal with particular streams should also be an important agenda item.

For the last plan, operators of existing capacity were asked whether new technology would mean an enhancement of their business. The Technical Report of 2012 (Section 2.22) stated

This identified that some of the existing sites could increase their throughput of waste considerably

The results of this survey were then summarily discarded as 'potentially uncertain and/or undeliverable'. It was surely not news to the Councils, or their consultants, that answers about future plans and prospects are by their nature 'uncertain and/or undeliverable'.

Interestingly, other answers about the future, in the form of waste projections, were wholly relied upon by the Councils. They too have proved 'uncertain and/or undeliverable' – by a large margin – yet the authorities have ploughed on, with unsupported expectations that '... a normal pattern of growth will be resumed in the near future'.

The Councils have argued to the PWA recently that 'best available data' was used in making projections. Are the Councils arguing, then, that it was not used by the operators of existing capacity in answering the Councils' questions?

In its research for the last plan, PWA identified that the waste planners in Worcestershire visited every operator, discussing their present business and future plans. They issued a comprehensive report and made their own estimates of any increase in capacity, which were then included in the waste plan.

The NLWP area is around one fifth that covered in the Worcestershire plan. PWA hopes to see a similar detailed exercise in our smaller area.

The estimates of throughput per hectare per year also seemed to be decided arbitrarily. The Councils argued that the Jacobs figure of 80,000 tphpa was 'optimistic'; no supporting reasons were offered however, either for that opinion or the subsequent choice of a throughput figure almost 40% lower.

Given that these two statistics are crucial in the calculation of landtake, it suffices to say that residents will expect to see proper supporting evidence in the new plan, and not assertion. They will also expect that the Councils will not rely on blatant logical inconsistencies such as that shown above.

Great attention will be paid to this area in next year's consultation.

UNDESIGNATED SITES

New un-designated waste sites should only be considered for inclusion in the plan as a last resort and should be required to have direct access to suitable rail and/or water connections, ie, adjacent to the site itself. New undesignated sites should only be included if the relevant borough has decided, at Cabinet level that it is potentially suitable for waste use, after consideration of a report setting out all relevant information about the proposed site, its surrounds and the impact of doing so on the borough's other planning policies. This should be done in a transparent way, with proper local consultation, so that concerns and objections can be dealt with at an early stage in the plan process.

In relation to the above, PWA draws the Councils' particular attention to the statement agreed on March 18th 2013 between itself and Haringey Council:

Haringey Council is committed to making decisions on the North London Waste Plan and future use of the Pinkham Way site in an open and transparent way.

In 2013, the Council will begin work on a new Site Allocations Development Plan (SADPD) and an updated Open Space Study. Both of these processes will involve looking at the current planning designation of sites in the borough, including the site at Pinkham Way.

The planning designation for the Pinkham Way site will be reviewed in the first instance as part of the first consultation draft of the Site Allocations Development Plan Document. A decision on this document will be made in public by Haringey Council's Cabinet.

Decisions taken on the planning designation for the Pinkham Way site will take into account the findings and recommendations of the Haringey Local Plan: Strategic Policies Inspector's Report.

The Pinkham Way site will not be offered by Haringey for inclusion for assessment as a potential waste site in the next iteration of the North London Waste Plan until after the publication of the first stage of the SADPD. Decisions on which sites Haringey will put forward for inclusion in the Waste Plan will be made by Haringey's Cabinet.

CHARACTERISTICS OF SITES SUITABLE FOR WASTE USE

In the previous plan, environmental criteria in the 'primary sift' included 'Local Environmental Classifications (allotments, green belt, green chains, green corridors etc)'. SINC's were initially included in this list, and subsequently omitted, so allowing the Pinkham Way site through. SINC is an environmental classification; its omission is irrational.

The distinction between brownfield or previously developed land (PDL) and greenfield has now been clarified in the London Plan 2011 (pp 297 & 306) and the NPPF (p55). In PWA's opinion, Pinkham Way appears to be just the sort of site the authors of the NPPF seemed to have had in mind when formulating the exclusion from the definition. The brownfield-PDL/ Greenfield test should be included in the primary sift, and should be a potential showstopper.

SITE SCORING

As the Councils will know, there remain numerous unresolved issues about the site scoring in the previous plan, which are covered in great detail in other responses. For this to be the case 4-5 years after the assessments were done speaks volumes. The fact that problems were recognised before the public ever became involved is confirmed by the minutes of the Planning Officer Group meeting of 15th February 2011, where the Programme Officer remarked that:

he was concerned at the potential problems that would be caused if lawyers started poring over site scores in the Technical Report, and that as a result he was setting in motion hiring some legal advice.

It should be noted that this meeting took place as the initial NLWA awareness meetings about Pinkham Way began. Thus the PO's comment was not made as a result of any questions or comment from residents.

With so much time having been spent by residents and officers in answering site scoring queries over the past two years, it is plain that criteria, weightings and methodology should be completely revisited, and, if this is necessary in order to avoid further years of dispute, be subject to a public consultation before potential inclusion in the plan.

In PWA's opinion, analysis of every aspect of site scoring will take up a good portion of the time spent examining next year's consultation document.

PROPOSALS FOR WASTE SITES

The London Plan identifies existing waste management sites and designated Preferred Industrial Locations as being particularly suitable for waste management and recycling. It envisages that land in strategic industrial locations will provide the major opportunities for locating waste treatment facilities but recognizes that some boroughs may have to look at locally significant industrial sites as well. Annex 3 of The London Plan lists nine strategic industrial locations within the seven North London boroughs. Is it not possible to find a space within one of those for any new waste sites that might be needed?

We refer elsewhere to the changing balance between recycling and residual waste. The plan should encompass this continuing trend, in particular the effect it will have on site selection and land requirements in terms of the need for smaller recycling/ re-processing plants dealing with individual waste streams.

POLICIES

Policy NLWP 1 is about safeguarding and protecting existing sites. It should not include the new sites identified in Schedule C.

Schedule C sites should have a separate policy. The Policy should be clear that before sites in Schedule C can be developed, a strong case must be put showing it is absolutely necessary. Schedule C should be considered "the Schedule of last resort". Perhaps Policy NLWP 2 could be used as a basis for an additional policy for new sites.

Any policy for new sites should require a developer to demonstrate that a) there is a demonstrable need for a new site, and b) no suitable sites are available in Schedules A and B. This new policy should also have an additional test, eg that there is no existing spare waste capacity within xx radius of the proposed new site. This would give a clear message that new sites should be taken as a very last resort.

PWA has made it clear that it would welcome the opportunity to offer the results of its own extensive research if the Councils feel that that would be of benefit. It is pleased to repeat the offer and looks forward to continuing contact with the Councils' officers in the future.

PINKHAM WAY ALLIANCE

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