

# North London Waste Plan to 2035

## Hearing Statement

### B Soundness

#### Main Matter 3 – Spatial Framework for waste

#### Question 24



Fly with green eyes 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 24

**Is the methodology/assessments used to calculate capacity gaps, amount of waste to be managed and land take requirements robust and clear and does it adequately take into account any potential future dampening factors on growth and forecasts in waste arisings?**

- 1.1 Several areas of PWA's R19 NLWP Representation cast doubts the robustness of the calculation methodologies employed, ultimately leading to its land-call requirement<sup>1</sup>. This is a conclusion supported by other respondents<sup>2</sup>.
- 1.2 The range of data presented is spread across several reports and / or tables within an individual report, making a holistic assessment difficult. As raised in Main Matter 1 answer / question 5 Appendix 1, the implications of the assessment have failed to be followed through to highlighting the impact on key targets, in this case recycling, where the NLWP's evidence base indicates an outcome failure. (See also MM 3 a/q 34 re this specific target, and also MM3 a/q 25 regarding the robustness and clarity of LACW forecasts.)
- 1.3 The plan's clarity would benefit substantially from a single table showing the key inputs, outputs of the methodology and their related assessments<sup>3</sup>, particularly:
  1. Forecast waste levels, by each analysed waste stream, over the plan term, with suitable time breaks (eg 5 yearly steps);
  2. Capacity by equivalent waste streams over the term and using the same time steps;
  3. Capacity surplus / gap by each analysed waste stream;
  4. (any) Changes in capacity, waste management type, and their (intended) source<sup>4</sup>;
  5. Export and import levels over the term, by waste stream;
  6. Key target ratios achieved, eg recycling
  7. Plan linked achievements, eg NSS, apportionment, by waste stream.
- 1.4 The inclusion of population and household data and the related waste per unit, including versus target, could usefully be added as a calculated line.
- 1.5 The Mayor's input - Representations R19 Representor Order GLA / 30.21 / 9 / P2 - suggests further enhancements relating to land and may therefore be an appropriate addition.

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<sup>1</sup> Eg Representations R19 Representor Order 36.05 / 5 & 6 / All / 5.214

<sup>2</sup> Eg Representations R19 Representor Order 24.8 / 5 & 6 / all / 32 (BPP Consulting LLP for PB Donoghue)

<sup>3</sup> A suggestion in line with the Mayor's input, see Representations R19 Representor Order GLA / 30.05 / 12 / all

<sup>4</sup> A suggestion in line with the Mayor's input, see Representations R19 Representor Order GLA / 30.05 / 10 / 10.7

## Conclusion

- 1.6 Such are the number and range of questions raised on the veracity of forecasts<sup>5</sup>, site availability / site capacity<sup>6</sup>, latest site data<sup>7</sup>, site replacement<sup>8</sup>, site potential<sup>9</sup>, and site intensification<sup>10</sup> that without rerunning the underlying model with acceptable data to confirm or otherwise determine output conclusions, the current 9h land need will risk being seen as not standing on proportionate evidence.
- 1.7 The model itself and its methodology should be transparent in respect of its inputs, assumptions and determining calculations.

## Suggested Approach

- 1.8 Rerunning the plan's model, having absorbed all post R19 input and other changes including more up to date actuals, would enable the true assessment of any changes to resulting capacity gaps and thereafter any potential fresh land need (if any); and if presented in tabular form as suggested above, to identify requirements such as when NSS and recycling targets are to be achieved - assuming they are to be. This appears to be an anticipated requirement<sup>11</sup>.

## 2 ... and does it adequately take into account any potential future dampening factors on growth and forecasts in waste arisings?

- 2.1 In the case of the new Edmonton site (700,000tpa) considerable long-term fixed plant is anticipated. Other investments will inevitably be considered as a consequence of the NLWP. If the forecasts are at risk of not achieving their projected levels, then feedstock levels may not be available, with potential implications spanning investment risk to NSS and unplanned import / export level changes<sup>12</sup>.
- 2.2 Dampening factors bring downside risk to the current waste forecasts from a broad spectrum of identifiable issues. These should be objectively assessed to ensure the chosen strategy is not unduly compromised.
  - As an example, MM 1 q / a 5 Appendix 1, has been rerun with the NLWP HIC forecasts dampened by 15% and attached as MM3 q/a 24 Appendix 4. The result indicates a significant 2026 shortfall in residual feedstock availability versus planned capacity of the Edmonton EfW due to be operational. The analysis does not extend into issues of NSS, import / export, related waste mile implications, or if recyclate would be employed to fill the gap and if so, with what impact on recycling targets.
    - Based on the early performance of actuals vs forecast, a 15% shortfall may not prove excessive, even before the influence of dampening factors for see MM3 q / a 26 Appendix 6, revealing an actual 13% single year difference.

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<sup>5</sup> Eg Representations R19 Representor Order 36.05 / 5&6 / 5.178 (PWA); 24.8 / 5 & 6 / All (PB Donoghue)

<sup>6</sup> Representations R19 Representor Order 24.1, 24.5, 24.8 (PB Donoghue)

<sup>7</sup> Eg Representations R19 Representor Order 13.4 (Environment Agency); 24.8 / % & 6 / All para 31 through 35 (PB Donoghue)

<sup>8</sup> Representations R19 Representor Order 5.16 through 5.30 (PWA)

<sup>9</sup> Representations R19 Representor Order 5.14 (PWA)

<sup>10</sup> Representations R19 Representor Order 30.11 / 4 / 4.5 (GLA)

<sup>11</sup> WDS 2019 Part 3 para 2.13

<sup>12</sup> Representations R19 Representor Order 36.05 / 5 & 6 / All / 5.213

## **Conclusion**

- 2.3 As unknown knows the robustness of the plan and the confirmation of it being based on proportionate evidence should see the inclusion of a what-if set of scenarios considering the effect(s) of (potential) waste level dampening factors such as those outlined<sup>13</sup>.

## **Suggested Approach**

- 2.4 The analysis should include the probability of an events occurrence and its potential impact. Some effects may be stand alone, others will inevitably operate in aggregate; that position should be reflected in the assessment.
- 2.5 A full scenario analysis exercise is not warranted.
- 2.6 Realistic and worst-case runs of the NLWP's main model based on identified risk(s) and assessment of any implications, including land need, should be undertaken.
- 2.7 Rerunning the model under the suggested risk scenarios should be presented in the same form as the suggested consolidated table (MM 2 q / a 24) and include the outlining of any resulting action(s).

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<sup>13</sup> Representations R19 Representor Order 36.05 /5200

# **MM3 Q 24 – Appendix 4**

## **NLWP LACW forecasts 15% dampened**

NLWP forecasts for LACW dampened by 15% (equivalent to approximately 100,000t of LACW in 2026). The impact suggested is of a substantive shortfall in area based residual waste feedstock for the new Edmonton plant (Capacity 700,000 tpa).

	2018	2021	2026	2031	2036
NLWP Position with 15% dampening					
Data Source: WDS Part 2 2019 Table 15					
WDI LESS 15%	658,553	674,777	702,709	731,796	755,932
LACW LESS 15%	799,664	839,124	847,811	860,785	872,250
Total HIC	1,458,217	1,513,901	1,550,520	1,592,581	1,628,182
Calculated:-					
WDI recycled at 75% (NB assumed immediately)	493,915	506,083	527,031	548,847	566,949
LACW recycled at 50% (in line with NLJWS)	399,832	419,562	423,906	430,392	436,125
WDI residual	164,638	168,694	175,677	182,949	188,983
LACW residual	399,832	419,562	423,906	430,392	436,125
Total recycled	893,747	925,645	950,937	979,240	1,003,074
<b>Total recycled %</b>	<b>61.3%</b>	<b>61.1%</b>	<b>61.3%</b>	<b>61.5%</b>	<b>61.6%</b>
<b>Total residual</b>	<b>564,470</b>	<b>588,256</b>	<b>599,583</b>	<b>613,342</b>	<b>625,108</b>

The capacity of the Edmonton EfW residual waste plant is 700,000 from 2026. Even allowing for bunker / swing factors, a shortfall in area based feedstock in the order of 100,000 tpa is highlighted