



Public Consultation on Main Modifications to the Proposed Submission North London Waste Plan (NLWP)

Representation Form and Guidance Notes

Please save and return to feedback@nlwp.net by the end of Thursday 10th December 2020.

This form has two parts:

Part A – Personal details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Guidance notes are available at the end of the Representation Form. Please read the advice in the guidance notes on making a representation attached to the consultation before completing this response form.

Please note that any comments you make will be made publically available and attributed to your name. Please see the [Privacy Policy](#) for details of how we use your information. We are required to share your information with the Planning Inspector for the purposes of the Examination.

Part A: Personal Details:

Name: Ben Griffith

Job Title:
(where applicable)

Organisation: XR Zero Waste
(where applicable)

Part B – Your representations

Extinction Rebellion (XR) exists to overcome the current climate and ecological emergencies which are already devastating human lives and ecosystems and are on course to cause grief and hardship on a scale not seen during human evolution.

Working alongside many other concerned parties, we have secured some success in raising these issues up the agenda of state and corporate actors. In the UK, central government is committed to a carbon neutral economy by 2050 and many local authorities have established more radical goals. However, the pace of practical and policy change is in no way commensurate with the challenges we face.

XR groups in the Local Authorities associated with the NLWA have been calling for radical changes in direction for waste strategy in north London. There is an urgent need to reduce the amount of residual waste generated across north London, for example by a rapid transition to a circular economy and a substantial improvement in the rates of recycling and composting. We have called for a pause and review of the proposed new Energy from Waste (EfW) plant at Edmonton which will increase incineration capacity and operate until at least 2050. We are appalled by:

- a. Its impact on climate change through greenhouse gas emissions – roughly one tonne of CO₂ is emitted for every tonne incinerated, so working at full capacity the plant will emit around 700,000 tonnes of greenhouse gas every year, although the NLWA cite a much lower figure¹
- b. its impact on local health and amenity eg. through air pollution, including the impact of transporting waste and the release of particulates too small to be captured through filtering
- c. Its underpinning of and reliance upon a continuing linear economy, which is not sustainable as it is extractive and is destroying ecosystems and contributing to the planet's sixth mass extinction event
- d. Its poor value for money, the financial risks and its dependence on a set of financial incentives not consistent with recognising the climate and ecological emergencies
- e. Very limited consultation and awareness of the project among residents of the seven boroughs.

¹ The NLWA subtract from the emissions total to account for the energy produced by the plant although the energy to be displaced is increasingly renewable. This means there is less and less point in EfW from a global heating perspective. This is not recognised in the NLWA's statistical methodology. Indeed, their calculations compare the energy from EfW to energy from gas powered power stations which is substantially more carbon intensive than the electricity currently available on the National Grid, let alone what will be provided by 2050. The National Grid has 'a target to achieve net zero by 2050, alongside interim targets of reducing our footprint by 80% by 2030 and 90% by 2040, from a 1990 baseline'.

<https://www.nationalgrid.com/responsibility/environment/environmental-sustainability/performance-environmental-sustainability/our-climate-commitment>

The NLWA also discount biogenic CO₂ although, put simply, burning a tree converts a carbon store into greenhouse gas. In its carbon accounting rules for 2019, the Intergovernmental Panel on Climate Change spells out that "if incineration of waste is used for energy purposes, both fossil and biogenic CO₂ emissions should be estimated". https://www.ipcc-nggip.iges.or.jp/public/2019rf/pdf/5_Volume5/19R_V5_5_Ch05_IOB.pdf Also, a joint Arcadis and Eunomia report explains: "Whatever the merits or otherwise of not reporting biogenic CO₂ for the purpose of national inventories, in comparative assessments between processes, it cannot be valid to ignore biogenic CO₂ if the different processes deal with biogenic CO₂ in different ways. Given that different processes often deal with non-fossil CO₂ in different ways, and that the atmosphere does not distinguish between molecules of greenhouse gas depending on their origin, the omission of non-fossil CO₂ from analyses appears dubious." https://ec.europa.eu/environment/waste/compost/pdf/ia_biowaste%20-%20ANNEX%20F%20-%20environmental%20assumptions.pdf.

The local XR groups set out their concerns in a letter to NLWA and the seven local authorities on 11 March 2020². The NLWA responded on 21 April and the XR groups issued a rebuttal of their response on 26 May³.

Various other parties have also called for a pause and review of the new incineration plant and have made representations to the NLWA. In particular, we'd like to draw attention to the UKWIN report challenging the value for money of the proposed incineration plant⁴. To date, there has been no evidence of a willingness on NLWA's part to review the project accordingly.

Nationally, the expansion of Energy from Waste capacity has been forensically examined by XR Zero Waste showing 'how energy-from-waste incineration undermines circularity and the net-zero carbon target'⁵.

We have reviewed the NLWP and the Main Modifications and conclude that they are incompatible with recognising the climate and ecological emergencies. The Plan as amended is fundamentally flawed particularly because

- It is incompatible with recognising the climate and ecological emergency.
- It ignores recent developments and emerging risks.
- It does not provide a clear and coherent waste plan.

We have set out our concerns about the NLWP in a separate document, the *Summary statement on the modified North London Waste Plan*, to complement and contextualise this consultation response.

We note that the 'Strategic Policy for North London's Waste' at paragraph 7.1 has become the 'Overarching Policy' and is subject only to AM modifications that are not for consultation. So we can say only that it is extremely disappointing that the opportunity has not been taken to refer to the climate and ecological emergencies or the need to reduce greenhouse gas emissions or the importance of sustainable development. While there is reference in the Overarching Policy to promoting the movement of waste up the waste hierarchy, the Plan sets out the modesty of the London boroughs' intentions in this regard, being dismissive about the scope for Prevention and Preparing for re-use and incoherent in relation to the recycling targets and waste projections that lie behind the proposed development of incineration capacity.

The comments below relate directly to the Main Modifications to the NLWP. We regard them as unsound – not positively prepared, since they are not consistent with sustainable development; not justified, since very little attention has been paid to alternative approaches and the evidence base cited is dated and thin; not effective, because cross-boundary issues such as coherence with London targets are deferred and not tackled; and not consistent with national policy in relation to sustainable development and meeting carbon reduction targets. We have not considered the legal compliance of the Main Modifications.

MM4 (section 2.27)

We find this a very disappointing attempt to clarify the Plan's approach to climate change. The short list of examples does not reflect the need for an objective assessment of the Plan, and alternative approaches to waste management, from the perspective of combating climate change. We would like this Modification to indicate instead that combating climate change through reducing greenhouse gases with the goal of net zero emissions has been and will continue to be a key priority and that strategic assumptions and proposed developments will be reviewed in that light. Particular

² <https://stop-edmonton-incinerator.org/extinction-rebellion-letter/>

³ <https://stop-edmonton-incinerator.org/extinction-rebellion-rebuttal/>

⁴ <https://ukwin.org.uk/vfm/>

⁵ <https://www.xrzerowaste.uk/annex-1>

attention should be paid to the scope for reducing waste, improving recycling rates, promoting repair and reuse, and developing a circular economy.

In relation to the five examples listed, it is worth mentioning that landfill of plastics produces much less greenhouse gas than their incineration; that the NLWA intends to transport waste from outside north London should there be spare capacity at the new EfW plant at Edmonton and that the Plan is not specific in relation to future arrangements for transport off road; that the Mayor's Carbon Intensity Floor is very undemanding; and that the other two examples relate to living with, rather than combating, climate change.

MM19 (Section 6.3 and Table 5)

Recycling targets need to be continually reviewed and made more ambitious. We suggest you refer to the statement by the UK Committee on Climate Change: 'Achieving a 70% recycling rate at the latest by 2030 ... will be key to ... limiting fossil emissions from energy from waste plants'⁶. (And the CCC is aiming for the UK to become carbon neutral by 2050, which is decades too late.)

MM20 (Section 5.13)

Recycling rates across the seven boroughs have been very low and flat lining for years. It is therefore difficult to obtain reassurance from the statement that the NLWA are 'expected to contribute to the Mayor's targets and produce a waste strategy to show they are acting in conformity with the LES policies and proposals'. Is it not incumbent on this Plan to set out a realistic account of how the targets could be achieved? Otherwise, the Plan seems to us to be fundamentally unsound.

MM23 (New Table after 6.4)

For the LACW column in the new table, it would be helpful to clarify how the figures and dates given for recycling relate to the Mayor's targets and the LES policies and proposals as well as the impact of transitioning to a circular economy.

MM24 (Section 6.4 (part))

Could it be clarified whether 0.81% growth applies to the LACW column which refers to 'NLWA Waste Forecasting Model' and if not could a summary figure be given for the LACW growth that is envisaged?

The text says: 'Growth of 0.81% was chosen as the preferred option because GLA evidence and projections anticipate substantial population and economic growth in London over the next few decades'. There is huge uncertainty over population projections for London (which have recently been substantially reduced⁷) and economic prospects (eg. due to the impact of Covid on activity and working patterns). There is also uncertainty about the likelihood and the potential impact of a transition to a circular economy. Would it be possible to provide reference to the GLA evidence and projections with a summary of key conclusions and information about when they were prepared and what level of uncertainty was acknowledged?

More generally, we appreciate the need for a central forecast but it would also be helpful to be more explicit about the extent of uncertainty and the range of potential volumes of residual waste in future years. The table refers to the NLWA Waste Forecasting Model and we know from Martin Capstick (NLWA) and Keith Townsend (Islington Council) that the 'residual waste forecasts that were put forward as part of the Development Consent Order application for the NLHPP indicated that residual waste tonnages for north London were likely to lie in the following ranges: - in 2020/21 between 567,000 tonnes and 661,000 tonnes - in 2036/37 between 491,000 tonnes and 687,000

⁶ <https://www.theccc.org.uk/publication/reducing-uk-emissions-2020-progress-report-to-parliament/>

⁷ <https://www.planningresource.co.uk/article/1678259/new-population-projections-show-lower-growth-rate-next-decade>

tonnes and - in 2050/51 between 509,000 tonnes and 713,000 tonnes'⁸. Focusing on such uncertainty – even as acknowledged in the NLWA forecasting - might have policy implications worth considering eg. whether there is a case for smaller-scale and shorter-term solutions or using a more modular approach perhaps with a variety of waste treatment methods.

The text states that maximised recycling 'was chosen as the preferred option' but for LACW the Table indicates 44% recycling and 50% HH recycling by 2035, as opposed to 50% LACW recycling by 2025 and 50% HH recycling by 2030 as set out in the LES - targets that are themselves unduly modest given the climate and ecological emergencies. Also, paragraph 6.9 refers to the need to achieve 65% recycling of municipal waste; paragraph 5.13 explains that this is the LES aim for 2030. Are these figures consistent? Please could this be explained.

It is also worth noting that the percentage of household waste reused, recycled or composted has flat lined and never exceeded 33% in any year from 2011/12 to 2018/19. The Plan does not give us any reason to believe that this will be increased to 50% by 2035, let alone 2030, let alone 2020.

We note the acknowledgement that the options reflect factors such as landfill tax charges and ROCs increasing the competitiveness of 'energy recovery'. You could also note that another factor is the omission of EfW facilities from the carbon trading scheme, currently the subject of legal challenge and also mentioned by the Committee on Climate Change as a potential area for policy development. An approach prioritising the avoidance of greenhouse gas omissions would, we suggest, result in different options being preferred and certainly more evidence of their being seriously considered.

MM25 (New below Section 6.6)

This states: 'Prevention and re-use also have a part to play, but in terms of waste management capacity in North London, recovery and recycling will play the most substantial part.' This statement is made without reference to supporting evidence but suggests a dire lack of ambition in relation to reducing waste and developing a circular economy. Notwithstanding the brief discussion at paragraphs 5.18 to 5.20, we suggest that this issue be researched further and that the text be amended. We note, for example, Arup's finding for the London Waste and Recycling Board that: 'a potential reduction of more than 60% in waste arisings can be achieved in less than 30 years. However, a central estimate of approximately 30% waste reduction is likely to be achieved depending on the levels of uptake of circular economy initiatives'⁹.

In NLWA's Standing Orders it is stated that one of the powers of the authority is to take steps to minimise the **generation** of controlled waste of any description, generated in its area (Section 63A of the Environmental Protection Act 1990). The NLWP would be an opportunity to set out clearly how this power will be exercised in the future.

MM26 (Table 8)

Again, it would be helpful to set out how the figures given for LACW waste streams relate to the Mayor's targets and the LES policies and proposals for recycling. The 4.5% increase in recycling and 3.6% increase in 'recovery' from 2020 and 2035 demonstrate the lack of ambition to secure serious reductions in residual waste. As a percentage of the LACW totals, the increase in recycling is minimal over those 15 years - from 42.37% to 42.57%.

However, according to Table 2 the 2016 baseline is just 27%. So the projection for 2020 appears to indicate a dramatic improvement between 2016 and 2020 but maybe the figures are not comparable or the 2020 projection is unrealistic: please could this be clarified? It might be helpful to include a table that includes real out-turn figures for recent years alongside comparable projections.

⁸ Letter to Ben Griffith, 22 July 2020

⁹ <https://www.arup.com/projects/london-waste-and-recycling-board-circular-economy-study>

MM32 (Section 8.6 moved here)

How is the loss of the composting facility in Edmonton, with no intention to replace it, consistent with the declared aim to move upward in the hierarchy of waste? This comes at a time when our soils are becoming increasingly depleted and compost is much needed.

MM38 (Table 6)

The LACW/C&I section includes a single line to cover projections combining the various sorts of waste but for capacity there are separate lines for recycling/composting and 'recovery'. This suggests that it would be appropriate to incinerate waste that could be recycled or composted – we hope that is not intended.

According to Table 6, the planned increase in capacity relates solely to waste incineration and not at all to recycling or composting. What is the justification for this?

MM37, MM39 (Section 6.7, New)

We note that 'additional waste management capacity will be in the "recycling" and "recovery" tiers' and that 'the North London Boroughs will seek opportunities for new capacity through intensification of existing sites and/or new facilities'. The document should be more explicit about whether these remarks indicate a prospect of additional incineration capacity over and above the new Edmonton EfW plant. And if so any plans should be subject to close and independent environmental review with a focus on the climate and ecological emergencies and there should be a clear timeline given for engagement and consultation with the populations across the seven boroughs.

A more appropriate response to any identified capacity gap would put a new emphasis on reducing waste, consistent with recognising the climate and ecological emergencies.

MM41 (New Table)

Again, this table suggests the possibility of additional EfW facilities, large scale and/or small scale. The document needs to be far more explicit about what is envisaged and how plans will be developed and justified.

MM42 (Table 7)

The revised Table 7 may be taken to suggest that any additional capacity in relation to LACW waste would be limited to recycling and also that any additional capacity in 'recovery' or 'treatment' would relate solely to hazardous waste. Could the Plan clarify this.

The text states: 'There is a requirement for additional recycling capacity to manage the increasing levels of recycled waste expected from the LACW/C&I waste stream reflecting the recycling target of 65% from municipal waste (LACW and commercial waste)'. This has been changed from 'There is **also** a requirement ...' It would be helpful to be explicit about the relationships between the recycling targets, the waste projections, the identified capacity gap and the land requirements – in particular, is this requirement in addition to the capacity gap previously identified? Or are the waste projections consistent with the recycling targets in some way that is not made clear?

MM58 (Section 7.9)

Is it really sensible, at the end of 2020, to assert that the NLWA and the seven boroughs are 'seeking to achieve a household waste recycling target of 50% by 2020'? It would however be appropriate to include a summary account of the factors underlying their failure to make progress and how those factors will be addressed.

MM58 also states: 'The North London Joint Waste Strategy, and this target, may be revised to bring it in line with the targets in the Mayor's Environment Strategy of 50% LACW recycling by 2025, 50%

household waste recycling by 2030 and 65% municipal waste recycling by 2030'. The Schedule says: 'These modifications are required to ensure clarity about the Plan's waste management strategy and demonstrate that it is positively prepared and justified'. We find it difficult to believe that the Inspector will think that clarity and positive preparation are demonstrated by saying the strategy and target 'may be revised'.

MM60 (new after Section 7.11)

We note with great concern that increasing recycling and composting facilities is discussed here in relation to 'opportunities' rather than clear commitments. This vague mention of increasing recycling rates is reflected in the approach taken in other parts of the NLWP such as Revised Table 8: Projected arisings and management of North London's waste 2020-2035 (MM26) where the projected increase in LACW recycling arisings over the next 15 years is just 4.5%.

We strongly oppose the inclusion of the Friern Barnet Pinkham Way site in this plan and in any form of waste management by NLWA. The grounds for this are:

- a. It is a Site of Importance for Nature Conservation (SINC), Grade 1 of Borough-wide importance
- b. It is part of a green corridor and as such contributes to absorption of pollution in the area as well as carbon sinking
- c. It sits 80m from the nearest housing and 14 schools lie within a 1.5Km radius of the site and a waste plant could cause infestations and further pollution in the area.
- d. It is in contradiction with Policy 5.

MM61 (New after Section 7.14)

Please could this be spelled out – at least to explain what are the opportunities, what does it mean to have 'recovery' capacity 'brought forward' and what are the three Priority Areas? How does this relate to Table 7 and Table 9 of Schedule 2? These identify two sites, Oakleigh Road and Eley's Estate, in relation to 'Integrated resource recovery facilities / resource parks'.

MM75 (New after Section 9.10)

Could all evidence of adverse impact, or even possible adverse impact, be made available and summarised in the Plan? Could the Plan also state that the boroughs will declare and publicise any enforcement action?

MM88 (Policy 5)

'...helps reduce greenhouse gas emissions' at point (i) is a very weak and unclear formulation. Why 'helps reduce' rather than simply 'reduces'? And the reduction should be by comparison with the best alternative approach for minimising emissions (as opposed, for example, to using the comparator of dumping waste in landfill which is often used in NLWA justifications for the planned EfW plant at Edmonton). In addition, there should be a requirement that any facility – in both its development and operation – will have a net zero impact on greenhouse gas emissions including emissions of both fossil and biogenic origin (building on the considerations at paragraph 9.43). Any offsetting calculations need to be approved by an expert agency independent of the NLWA and the seven boroughs.

The proposed expansion of the Edmonton incineration facilities would breach Policy 5(i):

- a. 'the development avoids increasing the levels of vulnerability to climate change' – the development will in fact increase climate change compared to current arrangements since it will be 30% larger and potentially emit around 30% more greenhouse gas, and it will increase climate change compared to an alternative waste strategy focused on waste reduction, a circular economy and recycling.

- b. ‘...makes appropriate adaptation and mitigation measures’ – there are no such measures planned.
- c. ‘...helps reduce greenhouse gas emissions’ – the opposite is the case.

The Committee on Climate Change argues: ‘Achieving the Balanced Pathway will require **waste prevention, re-use and recycling efforts** to keep EfW **emissions approximately flat** over time (between 5-6 MtCO₂e/year) **before CCS starts being retrofitted** to plants.’ The Edmonton project by contrast represents a 30 per cent expansion in EfW emissions in north London, is not supported by a coherent plan for waste prevention, re-use and recycling, and is part of a national surge in EfW development¹⁰. The CCC argues: ‘For those plants not yet under construction, new energy-from-waste plants (and plant expansions) should only be constructed in areas confirmed to soon have CO₂ infrastructure available, and should be built ‘CCS ready’ or with CCS’. The NLWP needs to be rewritten to acknowledge and respond to the CCC’s recommendations.

MM97 (Policy 6)

The ecological case for EfW is increasingly threadbare as renewable sources of energy become more extensively used (and unavoidable in relation to electricity supplied through the National Grid which has targets to achieve net zero by 2050 and an 80% reduction in footprint by 2030¹¹) and as the urgency of energy efficiency investment is recognised. The carbon intensity floor referred to at paragraph 9.59 is set at a very undemanding level.¹²

Given the failure of the boroughs and the NLWA to make progress on recycling, it is hard to gain reassurance from the implication that waste developments are appropriate only where ‘waste cannot be managed at a higher level in the waste hierarchy’.

We would urge deletion of ‘or economically viable’ which threatens to undermine this Policy.

MM98 (Section 9.34)

On what basis is heat from EfW facilities described as ‘low carbon’? Clearly the facilities are major emitters of CO₂. We suggest that this phrase be deleted.

¹⁰ See <https://www.theccc.org.uk/publication/sixth-carbon-budget/> - see the main report and also the Waste sector summary report.

¹¹ <https://www.nationalgrid.com/responsibility/environment/environmental-sustainability/performance-environmental-sustainability/our-climate-commitment>

¹² The London Plan includes a carbon intensity floor set at 400 grams of CO₂ equivalent per kwh generated. By comparison:

- a. 250 grams of CO₂ per kwh is used as a threshold by the European Investment Bank to screen investments.
- b. 100 grams of CO₂ equivalent per kwh is the maximum for gas power plants to be classed as a sustainable investment according to draft European rules.
<https://www.euractiv.com/section/energy/news/eu-set-to-deny-gas-power-plants-a-green-investment-label/>
- c. 256 grams of CO₂ per kwh of electricity is the 2019 figure for homes on the average energy fuel mix according to UK government reporting. <https://bulb.co.uk/carbon-tracker/>
- d. 48 grams of CO₂ per kwh of electricity consumed will be emitted by 2030, it is predicted.
<https://democracy.islington.gov.uk/documents/s23398/Appendix%203%20-%20Vision%202030%20-%20Islington%20Net%20Zero%20Carbon%20Strategy.pdf>

MM103 (Section 10.6 Table 14)

Clearly, we regard the 'Target(s)' as inappropriate since they are based on forecasts which are very disappointing, eg. in relation to the potential of a circular economy and recycling and composting.

We are disappointed that there is no reference to collecting data against ambitious targets for reducing greenhouse gas emissions, protecting biodiversity (local and otherwise) and reducing air pollution eg. through the release of particulates.

In relation to IN1, data should also be monitored on the types of waste (food waste, other compostable waste, plastics etc) and how they are managed in light of the implications for greenhouse gas emissions.

In relation to IN5, data should be collected on the use of road transport with zero carbon emissions. Data should also be collected on non-road transport in relation to any greenhouse gas emissions and other amenity, health and sustainability factors.

In relation to IN7, there should be more recognition of the disadvantages of importing waste, eg. due to the transport requirements and the impact on local residents. The NLWA plans to import waste to the new EfW plant at Edmonton should it not run at full capacity on waste from the seven boroughs.

We hope that these comments are helpful and are happy to respond to any questions. We look forward to the release of the final version of the NLWP and hope that it will demonstrate recognition of the climate and ecological emergencies.

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1. Do you require notification of any of the following to your email address stated in Part A:

The publication of the inspector's recommendations following the independent examination (Y/N): Y

The adoption of the Local Plan (Y/N): Y