

Summary statement on the modified North London Waste Plan

XR Zero Waste (<https://www.xrzerowaste.uk/>) has identified three key deficiencies in the modified North London Waste Plan (NLWP)¹. This document presents recommendations designed to help the seven North London Boroughs overcome these deficiencies.

Key findings

As detailed on the following pages, the NLWP and its Main Modifications have three fundamental shortcomings:

1. They are incompatible with the climate and ecological emergency.
2. They fail to take account of recent developments and emerging risks.
3. They do not provide a clear and coherent waste plan.

Key recommendations

- The seven North London Boroughs should **commission an independent review of the climate impact** of the proposed 700,000-tonne incinerator and the waste plan more generally.
- The seven North London Boroughs should **require that the modelling be run again**—based on the most recent information available and current targets—to ascertain the scale of residual waste and surplus capacity that are now to be expected.
- The Finance Directors of the seven councils should urgently **assess the business case** for investing residents' money in 700,000 tonnes of surplus incineration capacity.
- The seven North London Boroughs should rewrite the NLWP to ensure that it demonstrates a firm **commitment to driving down residual waste** and **consistency with national and municipal policies and targets**.

1. Climate and ecological emergency

While the UK government is legally required to reach net zero by 2050, 30 years away, North London's local councils rightly have much tighter timescales for getting to net zero and should design their waste strategies accordingly.

Doing so requires a waste plan that 1) clearly references relevant climate targets in the context of the UK's broader commitment to limiting temperature increases to 'well below 2°C above preindustrial levels and pursuing efforts to limit the temperature increase to 1.5°C above pre-industrial levels', and 2) sets out a robust framework to help the seven North London Boroughs address the climate and ecological emergency.

The NLWP fails on both counts. The document only pays lip service to the climate emergency. In particular, the Overarching Policy for North London's Waste² makes no mention at all of the climate and ecological emergency, greenhouse gas emissions or sustainable development.

Specifically, the NLWP fails to take into consideration relevant evidence and guidance on implementing low-carbon plans, promoting recycling and developing a circular economy, as articulated in:

- reports of the Climate Change Committee(CCC), which recommends that local authorities concentrate efforts to reduce emissions and manage climate risk in areas where they can have significant influence, such as waste management;³
- the report of the Climate Assembly, which emphasises the importance of recycling and repair;⁴
- the 2018 Resources and Waste Strategy for England;⁵
- the 2020 Waste Management Plan for England;⁶ and
- reports of Extinction Rebellion, issued both at the borough level in north London and at the national level through XR Zero Waste.⁷

The Standing Orders of the North London Waste Authority state 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.

Further, the NLWP does not provide an accurate assessment of the long-term climate impacts of its proposals, including the implications of expanding waste incineration capacity by 30% despite steadily decreasing waste arisings and the London Mayor's confirmation that the city faces 950,000 tonnes of incineration overcapacity based on the new London Plan (see Point 2, below).

Such an assessment could have been introduced in or following Main Modification 4 (new paragraph 2.27), which claims that the NLWP 'aims to deliver effective waste and resource management which makes a positive and lasting contribution to sustainable development and to combating climate change'. At the most basic level, however, the section fails to account for the *total* greenhouse gas emissions⁸—and especially the fossil-based CO₂ and NO_x—that the North London Heat and Power Project (NLHPP) will emit over its lifetime; the anticipated additional CO₂ emissions linked to importing waste into north London to keep the incinerator running at capacity; the embodied

carbon emissions related to the construction of the new facility; and the NLHPP's relatively carbon-intensive method for generating energy, particularly as compared to renewable energy production (instead, the NLWP falsely describes the energy to be generated by the incinerator as 'low-carbon').

By failing to provide an accurate assessment of current and projected greenhouse gas emissions, the Plan prevents councils from forming a solid understanding of emission patterns, how these patterns relate to their climate ambitions, and what roles they should play in slowing climate breakdown.

Recommendation

*The seven North London Boroughs should **commission an independent review of the climate impact of the proposed 700,000-tonne incinerator and the waste plan more generally.***

2. Recent developments and emerging risks

Recent developments

The NLWP is based on out-of-date analysis and modelling, such as waste arisings projections made in 2015. To be valid and useful today, the Plan should reflect the current understanding of risks in relation to both incineration capacity and costs.

In this context, the NLWP should recognise that London is headed towards substantial incineration overcapacity in relation to residual waste arisings, should recycling targets be met. Indeed, when factoring in the development of the second Cory incinerator and the new Edmonton incinerator, the Mayor's office forecasts a **capacity surplus of 950,000 tonnes**.⁹

As recycling rates increase to meet municipal and national targets, in line with the recommendations of the CCC and the Climate Assembly, residual waste will necessarily decrease. In the 2015 Need Assessment for the NLHPP, however, even the modelling for a 'central' recycling rate suggests that residual waste arisings—579,725 tonnes by 2030/31 and 611,277 tonnes by 2050—would be significantly less than the NLHPP's planned 700,000 tonnes (see Table 3.3). If these calculations were to be redone to take account of the CCC's latest recycling recommendations, namely 70% recycling by 2030, the planned incinerator's capacity would prove even more excessive.¹⁰

Another side of this issue is that the Need Assessment provides inflated residual waste projections. Emerging evidence, if factored into revised modelling, would demonstrate that actual arisings are significantly lower. In particular:

- published data for the years since 2015 show that residual waste has declined, contrary to the trends projected by the modelling;¹¹
- projections for London's population were significantly reduced even before the Covid pandemic cast such doubt on the attractiveness of living in the capital;¹² and
- uncertainties regarding London's future economic growth—in relation to the Covid pandemic's impact on work habits and commuting, Brexit, and the government's determination to direct resources and promote growth away from London and the South East—will undoubtedly affect the amount of waste produced in north London.

In addition, residual waste will be massively reduced as the UK transitions to a circular economy, in line with national and local governments' climate ambitions. As Arup reported to the London Waste and Recycling Board: '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.'¹³

Recommendation

*The seven North London Boroughs should **require that the modelling be run again**—based on the most recent information available and current targets—to ascertain the scale of residual waste and surplus capacity that are now to be expected.*

Emerging financial risks

There are now major financial risks associated with the proposed waste incinerator, whose operating capacity would exceed that of the current facility by 30%.

The trends towards surplus capacity across London cast doubt on the likelihood that the NLHPP will be able to operate at full capacity. The efficiency of the steam turbines of the incinerator will drop substantially if not operating at full load, resulting in less energy produced per unit of waste incinerated and higher emissions.

The prospect of financial assistance from the central government is poor given:

- the North London Boroughs' commitment to building the 700,000-tonne NLHPP even though the Mayor's office confirmed that the facility would contribute to a forecast surplus capacity of 950,000 tonnes;
- the level of government debt following the Covid pandemic;
- Iain Duncan Smith's request that the government support a value-for-money review of the incinerator project;
- the government's declared intention to shift public resources away from London and the South East; and
- the inevitable need to invest in climate change resilience and the possibility of further pandemics and other large-scale disasters.

Adding to this financial insecurity is the Committee on Climate Change which argues for Carbon Capture and Storage: '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'. 'By 2050, 30% of [waste] sector abatement comes from retrofitting CCS to the UK's fleet of energy-from-waste facilities.' This recommendation translates into substantial costs for incinerator operators.

Moreover, the new CCC report states that energy-from-waste incinerators benefit from a de facto 'fossil fuel subsidy' as these plants 'face very little carbon taxation'.¹⁴ 'Government policy could also focus on EfW emissions, either through carbon taxation or inclusion in a UK ETS, and/or providing incentives for CCUS to be installed.'¹⁵

The judicial review of the government's decision to exclude waste incineration emissions from the UK Emissions Trading Scheme represents another financial risk to the sector.¹⁶

It should also be noted that the NLWP pays no regard to the highly pertinent recommendations of the UK Without Incineration Network (UKWIN) for conducting a value-for-money review of the NLHPP.¹⁷

Recommendation

*The Finance Directors of the seven councils should urgently **assess the business case** for investing residents' money in 700,000 tonnes of surplus incineration capacity.*

3. No clear way forward

The NLWP effectively ignores the climate and ecological emergency and appears blind to the risks in its key proposals in relation to surplus capacity and financial challenges. But even leaving these issues aside, the NLWP is unsound and should be rejected, as it does not set out a clear plan for waste.

For example, different figures are presented on recycling which fail to cohere into a clear, sound and consistent picture of intent, let alone demonstrate commitment to steady progress over the years covered by the Plan.

On household waste:

- The percentage of household waste reused, recycled, or composted has flatlined and never exceeded 33% in any year from 2011/12 to 2018/19.¹⁸
- Yet the NLWP claims that the NLWA and the seven North London Boroughs are 'seeking to achieve a household waste recycling target of 50% by 2020' (although that target will be missed by a wide margin).
- The NLWP says that the London Environment Strategy states that 'the Mayor expects waste authorities to collectively ... aspire to achieve 45% household waste recycling by 2025 and 50% by 2030'.
- 50% HH recycling is projected by 2035 (new table at page 52).

Similarly, a range of figures is given on local authority-collected waste:

- The NLWP provides a baseline figure of 27%, which dates from way back in 2016 (see Table 2).
- The target set in the 2019 draft New London Plan is 50% by 2025 (see Table 2).
- 44% LACW recycling is projected by 2035 (see the new table at page 52).
- Recycling is projected to flatline from 2020—at 42.37% in 2020 (418,169 of 987,041) and 42.57% in 2035 (436,824 of 1,026,176) (see Table 8).

In relation to the London Environment Strategy, the NLWA is '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' (paragraph 5.13 of the NLWP). This aim is not achieved in the NLWP.

The above-mentioned figures and the accompanying text do not set out a clear, logical, or evidence-based path for achieving substantial improvements in recycling rates.

Further, the NLWP is opaque in relation to the need for more capacity to handle residual waste. For example, we read 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'. Do these remarks indicate an intention to create additional incineration capacity over and above the new Edmonton plant? Surely this should be clarified.

The NLWP does not reflect the uncertainty that applies to long-range forecasts, particularly up to 2050 and beyond. The incinerator project involves two massive facilities tied into the delivery of energy to local residents. Acknowledging uncertainty would create scope for north London councillors to consider options that are shorter-term, smaller-scale, more modular, and more flexible, as well as alternative waste treatment systems.

More importantly, an evidence-based approach would offer the seven North London Boroughs the facts they need to carry out a proper assessment of the merits of investing in waste reduction, reuse, repair, remanufacturing and other circular economy infrastructure and activities that can help to accelerate the shift towards a zero-waste economy, which, in turn, would help north London secure more jobs, cleaner air and associated improvements in public health.

Recommendation

*The seven North London Boroughs should rewrite the NLWP to ensure that it demonstrates a firm **commitment to driving down residual waste and consistency with national and municipal policies and targets.***

XR Zero Waste

<https://www.xrzerowaste.uk/>

Notes

¹ Based on the copy available at <https://www.nlwp.net/wp-content/uploads/2020/11/NLWP-submission-Jan-2019-with-proposed-modifications-Oct20.pdf>

² See page 75 of the NLWP at <https://www.nlwp.net/wp-content/uploads/2020/11/NLWP-submission-Jan-2019-with-proposed-modifications-Oct20.pdf>

³ See <https://www.theccc.org.uk/publication/how-local-authorities-can-reduce-emissions-and-manage-climate-risks/> and <https://www.theccc.org.uk/publication/reducing-uk-emissions-2020-progress-report-to-parliament/>.

⁴ See <https://www.climateassembly.uk/report/>.

⁵ See <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>.

⁶ See <https://www.gov.uk/government/consultations/waste-management-plan-for-england>.

⁷ See, for example, <https://stop-edmonton-incinerator.org/latest-news/> and <https://www.xrzerowaste.uk/view-the-letter>.

⁸ As the Intergovernmental Panel on Climate Change specifies, an appropriate accounting of greenhouse gas emissions from energy-from-waste incineration must reflect both 'both fossil and biogenic CO₂', but the North London Waste Authority and its constituent councils have consistently failed to abide by these instructions. See page 5.8 at https://www.ipcc-nggip.iges.or.jp/public/2019rf/pdf/5_Volume5/19R_V5_5_Ch05_IOB.pdf. See also Section III of <https://stop-edmonton-incinerator.org/wp-content/uploads/2020/05/2020-05-26-XR-rebuttal-of-NLWA-claims.pdf>.

⁹ Email from Anne-Marie Robinson, Principal Policy Manager, Greater London Authority, to XR Zero Waste, 16 November 2020.

¹⁰ See http://www.northlondonheatandpower.london/media/rmhdohgu/ad05-04_need_assessment_lores.pdf.

¹¹ See Figure 2.2 at https://www.nlwa.gov.uk/sites/default/files/inline-files/annual-monitoring-report-2018_19-final-v2.pdf.

¹² <https://www.planningresource.co.uk/article/1678259/new-population-projections-show-lower-growth-rate-next-decade>.

¹³ See <https://www.arup.com/projects/london-waste-and-recycling-board-circular-economy-study>.

¹⁴ See <https://www.theccc.org.uk/publication/sixth-carbon-budget/> - see the main report and also the Waste sector summary report.

¹⁵ For more details on the financial risks, see Section VI of Annex 1 in XR Zero Waste's open letter on transitioning to a circular economy without more waste incineration, available at <https://www.xrzerowaste.uk/annex-1>.

¹⁶ See <https://www.leighday.co.uk/News/Press-releases-2020/December-2020/Permission-won-for-judicial-review-of-post-Brexit>.

¹⁷ See <https://ukwin.org.uk/vfm/>.

¹⁸ See pp. 2–3 in <https://stop-edmonton-incinerator.org/wp-content/uploads/2020/05/2020-05-26-XR-rebuttal-of-NLWA-claims.pdf>.