



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: Carina Millstone

Job Title:
(where applicable)

Organisation: Stop The Edmonton Incinerator Now- Non-incorporated community group
(where applicable)

Part B – Your representations

Please use a separate sheet for each representation

1. To which Main Modification does this representation relate?

(one modification reference per form)

I urge the inspector to reject the North London Waste Plan as whole as it fails the test of soundness, with local authorities and the North London Waste Authority, a key stakeholder, time and time again over forecasting the amount of residual waste that North London generates, and failing to effectively reforecast as new information becomes available. As a result of this, the residual waste infrastructure proposed for North London is grossly inadequate, and inconsistent with waste prevention and recycling targets.

The plan overall cannot be said to be positively prepared as per the definition provided below, as it plans for waste capacity that far exceeds requirements- *providing a strategy which, as a minimum, **seeks to meet the area's objectively assessed needs**; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development*

Main Modification reference:

Paragraph number:

2. Do you consider the proposed Main Modification to be:

Legally compliant (Y/N):

Sound (Y/N): No

3. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your comments relate to:

Positively prepared- not positively prepared

Justified

Effective

Consistent with national policy

4. Please give details of why you consider the proposed Main Modification is not legally compliant or is unsound. Please be as precise as possible.

I would like to draw your attention to several points to substantiate this claim:

The Issues and Options Report of 2007 for the North London Waste Plan has been shown to overestimate residual waste predicted

The Eunomia study of 2014 that informed the capacity of the incinerator found that future waste arisings were 'essentially unknowable' – this striking admission does not constitute an objectively assessed need

The NLWA admitted in 2019: "*When the NLJWS was published it was envisaged that an increasing population would produce an increase in the amount of waste arising which in turn would require a combination of an increase in the waste treatment capacity provided and intensification in the use of the existing facilities. Unexpectedly, the amount of waste produced between 2006/07 and 2012/13 fell despite the increase in population and dwelling stock, as shown in the below chart and it would appear to be related to the economic downturn during this period. 2013/14 saw a return to increasing waste volumes but this has not been sustained and the waste produced in the north London area has decreased again in 2018/19*". (NLWA Annual Monitoring Report 2018/19)

For a full analysis of the waste overcasting, please see a study recommending a value for money study of the incinerator <https://stop-edmonton-incinerator.org/wp-content/uploads/2020/05/UKWIN-2020-Edmonton-VfM.pdf>

More recently, I would like to draw your attention to 2 striking developments, especially with regards to the soundness and the strategy being in consort with other authorities.

Planning permission has been granted for the building of a new incinerator in Bexley. According to private correspondence with the Mayor's office, building both incinerators will result in a 950,000 tonnes waste overcapacity for London, should London meet the Mayor's recycling targets: '*We can confirm that the modelling that supported the development of the London Plan and London Environment Strategy did not include the second Cory facility. That modelling showed that if London achieves the reduction and recycling targets there will be a surplus energy from waste capacity of 153,000 tonnes. The DCO for the second Cory facility set a capacity of approximately 806,000 tonnes; if the maximum capacity is delivered through this development it will therefore lead to a forecast surplus capacity of approximately 950,000 tonnes.*' To my knowledge, neither the Council nor the NLWA have reviewed the implications of this second incinerator. A first, very obvious implication is that the new plan to import waste from areas outside of North London to feed the proposed incinerator may not materialise, as there will be significant competition for waste. The financial implications of insufficient feedstock have not been assessed, neither have their implications on acting as a disincentive to recycling in North London, should recyclable waste be required as feedstock to fulfil heat and power generation contractual obligations.

Last month, Adam Harrison, NLWA board member from Camden and Camden Cabinet member said at a Camden Environment Scrutiny meeting that the capacity was determined and decided by the DCO- 'If there is overcapacity in the future 'then *we would be looking to decommission regionally* or nationally some waste stations if they're not needed'
https://www.youtube.com/watch?v=wAT_JI7j5O4

This suggests that neither Camden Council, nor the NLWA know whether there is likely to be residual waste overcapacity in the future (if), but that the NLWA/ Camden Council is also open to the fact that it *may need to decommission its facility in Edmonton ahead of its expected lifetime*. This is an absolutely startling admission which warrants further exploration before the NLWP is approved, and of course, adds further weight to the argument that the proposed EfW plant in Edmonton is no longer suitable to meet North London's residual waste needs.

- 5. Please set out what change(s) you consider necessary to make the proposed Main Modifications legally compliant or sound, having regard to the test you have identified in Q3 above where this relates to soundness. You will need to say why this change will make the proposed Main Modification to the Proposed Submission NLWP legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Urgent reforecasting in light of net zero legislation, technological and cultural developments, waste legislation needs to be carried out

- 6. 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

I would also like to raise the completely inadequate notice for this consultation: as far as I'm aware, Waltham Forest Council only put the public notice of this consultation in the December edition of Waltham Forest News. I received this in my letter box on 8th December, giving me- and other members of the public- less than 48 hours to respond to the consultation. This is unacceptable. Please review for legal compliance and reopen the consultation if necessary.

I have a few other comments on specific aspects of the plan as follows. All of these fail the soundness test.

7. To which Main Modification does this representation relate?

1.11

The North London Waste Authority's (NLWA) and the seven constituent boroughs have produced the Joint Municipal Waste Management Strategy (JMWMS) (2009). The NLWA, as the Waste Disposal Authority for the NLWP area, is a key stakeholder. The NLWA is responsible for managing the household waste collected by the North London boroughs, in particular household waste but also and also for the household waste deposited at Reuse and Recycling Centres and some waste that the boroughs collect from local businesses; collectively this is known as Local Authority Collected Waste (LACW). The NLWP is required to ensure there is adequate provision for the disposal and recovery of this waste stream.

I wish to highlight that in planning an incinerator considerably too big to serve North London's households residual waste needs that the NLWA is expanding its remit. The NLWA does not have responsibility for managing industrial and commercial waste, neither does it have a remit to import in waste from elsewhere to run its proposed incinerator. The NLWA does not exist to establish North London as a major waste processing centre. I would like clarity on the authority that has given the NLWA to operate beyond its clearly defined statutory remit- or I am left with the impression that the NLWA is a self-serving institution.

8. To which Main Modification does this representation relate?

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"The Boroughs are seeking a sustainable network of waste facilities which helps reduce movements of waste, including waste exports and increase opportunities for waste to be managed in proximity to its source."

I would like an explanation from the 7 North London boroughs on how their proposal for a single site incinerator facility, not centred on the sub region, nor on the weighted centre of its LACW generation, and which will require waste imports is consistent with this statement. The NLWA's plans to build the Edmonton incinerator appear to be a direct contradiction to that statement.

9. To which Main Modification does this representation relate?

2.7 & 2.8: The Boroughs also seek to improve the health of residents and tackle deprivation. Impact on human health has been a key consideration in the development of the NLWP

I have seen no evidence that the boroughs have assessed new, recent evidence on the health impacts of the proposed incinerator, the borough's proposed residual waste disposal strategy. This sentence is meaningless and unsubstantiated. I would like to see evidence that the boroughs are reviewing best available evidence in their residual waste planning.

For recent evidence, see the GLA commissioned study that attributes 15 deaths a year to London's incinerators

https://www.london.gov.uk/sites/default/files/gla_efw_study_final_may2020.pdf

Or a recent open letter to Boris Johnson signed by 70 doctors calling for a pause and review of the incinerator due to health considerations (page 15)

<https://enfielddispatch.co.uk/wp-content/uploads/2020/09/Dispatch-25.pdf>

10. To which Main Modification does this representation relate?

2.12 The NLWP seeks to reduce the reliance on disposal to landfill sites outside London as this contributes to CO₂ emissions from transport. While it is recognised that waste management facilities will continue to generate CO₂ emissions, new waste facilities generating energy need to meet the Mayor's Carbon Intensity Floor. The priority of the NLWP will be to implement policies and direct new development to sites which deliver a better overall environmental outcome.

Assessment of getting in waste from further afield to the proposed Edmonton incinerator have not been assessed. There is a current legal challenge against BEIS which suggests that BEIS may have acted unlawfully when it designed the UK's emissions trading scheme, excluding incinerator plants. Moreover, the CCC has now ruled that incinerators will need to be retrofitted too meet climate goals.

There are currently no plans to include carbon capture and storage (CCS) on the incinerator- the technology is not available. This has not been costed or assessed, but NLWA board members and staff are starting to misleadingly say in public that this may be an option.

There is no evidence that the proposed approach to residual waste management- incineration- will lead to the best environmental outcomes.