Response to Phase 2 Edmonton Consultation (Cover Only)

Summary

This submission to the Phase 2 Consultation develops points outlined in my Phase 1 Consultation input. In particular that insufficient – indeed any – quantification has been given to the cost / benefit / risk issues of alternate capacity sizes for the proposed incinerator.

Such analysis should also include a cost / benefit / risk analysis of a stepped approach to building capacity should, and only if, experience deeper into a three decade plus plan proves such a requirement is both necessary and cost effective at that time.

It re-seeks answers to numerous unanswered points put forward as Phase 1 input, many of which raise issues of over-capacity assumptions written into the underlying modelling which inflate the desired capacity; and goes on to raise further issues from answers supplied to overall Phase 1 input.

It points out that the underlying modelling no longer uses the most up to date data (so significantly contradicting the NLWA Needs Assessment of May 2015 page 139). The effect of using official data is a noticeable reduction in the required plant capacity. It highlights that the desired capacity of 700k tpa is substantially above what this data warrants. A figure closer to 400k tpa is derived.

It questions why the Apportionment, that element of London's overall self-sufficiency target allocated to the NLWA area, is ignored and instead a higher target is simply assumed without rationale nor relative costings and associated risk assessment. (See Chart A which follows below.)

All this assumes the ERF plant based at Edmonton is an appropriate piece of North London's Waste Resource Strategy jigsaw. Despite the scale and permanency of plant envisaged, it is evident no such strategy exists. This in turn makes supporting calculations, such as overall comparative climate impacts, comparison of waste journeys, and more crucially, comparison of complete strategic options, impossible to determine. There are no comparative options, neither of plant type nor plant scale to the stated path.

The Mayors aspiration for higher recycling levels is ignored by London's largest WDA for a three decade plus period, despite the NLWA representing approximately one quarter of London's total population and area. There has to be a large question mark over management's Waste Hierarchy satisfying ambition. London surely deserves better.

A £500m investment based substantially on a forecasted 2051 outcome of a new, untested metric; additionally underwritten in one waste stream by an acknowledged highly wobbly data set; and with inherent inflationary numeric assumptions below the surface; all before adding large extra capacity on top, is a very big, highly questionable, and therefore very risky bet for taxpayers. Is a smaller, less costly, bet a better bet? NLWA should first be required to find out and so prove their case before seeking agreement to the current concept.

The challenge is the waste hierarchy and a cost effective solution for taxpayers. Both remain inadequately addressed.

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Chart A

NLWA Eunomia Modelling (pre added headroom) vs GLA London Plan Requirement

The Apportionment is that element of London's waste self-sufficiency requirement allocated to the individual Boroughs. It is based on an analysis of their ability to deliver a proportion of the London total and reflects many factors. The seven Boroughs which make up the NLWA sub region, roughly one quarter of London's total area and population, pool their individual Apportionments to produce a single Apportionment figure for the NLWA.

Achieving the waste processing levels of the Apportionment would mean the NLWA has fulfilled its part of London's self-sufficiency requirement. The Apportionment is up to date (Last issued March 2015.)

The dotted line shows the NLWA waste processing Apportionment requirement out to 2036. Waste levels above the Apportionment can be **exported**.

The solid line shows the NLWA / Eunomia baseline calculation before adding desired extra capacity headroom on top. It also excludes additional, smaller waste streams not included in the Apportionment. Much of the extra capacity desired is planned to be filled with **imported** waste.

Is it not reasonable to expect the NLWA to cost and risk assess the Apportionment route?

Differing views of NLWA sub regional waste objectives (thousand tonnes per annum)