

### Submission 3: 1257997 Brian O'Leary

#### **MATTER 5: THE ENVIRONMENT, CLIMATE CHANGE, FLOOD RISK, POLLUTION AND WASTE MANAGEMENT**

**Issue 1 - Whether the policies relating to the environment, climate change, flood risk, pollution, and waste management are positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan (Policies 79–95).**

In LP1 Promoting Sustainable Waste Management is only addressed over 3 pages, leaving more doubts and questions than answers. Matters have advanced since LP1 was written, particularly the contracting of Acciona to build the new incinerator. NWLA have posted documents to justify their actions and future intentions, but there is limited reference to these in LP1.

Given the importance of climate change and the potential financial liability of residents to the Council's policies in LP1, involving collaboration in the large scale NLWA's plans, I believe **the Strategic Objective of Sustainability and efficient waste management p207 is not supported in the Plan. The Plan is very incomplete, has not been positively prepared, is not consistent and is therefore unsound.**

#### **a) Problems:**

- 1. Population and waste projections** of the London Plan, based on out of date assumptions, are maybe overestimates. If so, the planned increased scale of the incinerator is unnecessary and will contribute to an excess capacity of 950,000 in London Area.

The **London SHMA 2017** 3.8 identified the following reason for their population projections ... " *London's population growth was particularly rapid in the last decades*". In turn

this was due to: strong economic growth, successive enlargement of the EU, 30% increase in numbers of births, continued fall in mortality and reductions in outward migration post '08 financial crisis.

However, post-Brexit and with Covid, many of these influences have radically changed: free EU movement has ended, there has been net outward EU migration from London with net non-EU migration uncertain, there has been an increase in the net internal out-migration from London, the birth rate could have fallen as a result, excess deaths have risen with Covid causing a fall in average life expectancy and, finally, with slower medium term growth expected internationally by many forecasters, London is unlikely to be an exception to the trend.

The GLA **Demographic Update Sept 2021, 2020-based Population Projection Results**, assumes a short run fall in numbers before previous long run trends resume in 2022. However the degree of divergence between their high and low population variant by 2025 (fig 2) indicates future uncertainty.

All this suggests, before future trends become clearer, a need for caution.

- *Why hasn't Scenario Analysis been undertaken to show potential revenue and cost implications of different levels of capacity utilisation, associated with different projections for population and waste production in the 7 boroughs?*
- *What would be the implications for Borough finances and future Council tax levels if waste projections fail to meet contractual commitments?*

**2. Import of waste** from outside 7 Borough consortium = 1m tonnes in 2016. “Waste will continue to be imported...over the planning period in line with market demands” ....**5.29**

**NLWP**

- *What is meant by market demands?*
- *Is this limited to just a London-wide cooperative endeavour to achieve London self-sufficiency?*
- *Is this just commercially or operationally driven by NLWA [Revenue stream + necessary guaranteed feedstock for ERF]?*
- *Has the potential concentrated negative health implications for disadvantaged local communities been considered when deciding on location? [Waste Incinerators are x3 more likely to be located in areas of deprivation: **Greenpeace**].*
- *Economies of scale and capacity utilisation seem to have been favoured over the Proximity Principle and negative externalities when decisions have been made on facility scale, location and imports. Why?*

**3. ERF offsetting not compatible with sustainability.**

It involves burning residual waste with fossil fuel content, instead of heat and power for local housing depending upon renewables.

Foregoing continued use of finite resource via the circular economy represents a higher opportunity cost than foregoing electricity generation via burning.

Additionally, electricity from waste schemes in 2019 generated 13% of UK greenhouse gases, even though it was

only 2.4% of electricity supply [Koppelaar, Environmental Economist]

- *Doesn't the high investment ERF lock-in NLWA to long term continuous waste streams; so if recycling significantly rises won't imports need to grow in line?*
- *If grid decarbonises before 2050 and ERF becomes redundant, how will Edmonton Incinerator be economically and environmentally viable?*
- *If future promised offsetting using CCS is not feasible/efficient, isn't sustainability again undermined?*

[ERF technology has no impact in reducing impact of non-climate-related pollutants: particulate matter PM0.1, NOx, SOx etc; so burning waste is a bigger negative effect on the environment than burning the equivalent oil]

#### **4. Residual Waste Reduction Plan [RWRP] 2020-22.**

**Borough Recycling Plan aims to meet 2025 50% LACW and C&I, LES [policy 7.2.2] & NLWA 2030 65% target [6.3, table 3].** Achievement enables moving up Waste Hierarchy and is necessary for sustainability and the achievement of Net Zero.

Note:

There is rising greenhouse gas emissions from incineration and stagnating recycling rates [43% av.] National Infrastructure Commission.

London has the the highest rate of incineration (59.3%) and the lowest rate of recycling (30.2%) in 2018/19 [Defra].

1 tonne of residual waste produces about 1 tonne CO<sub>2</sub>, rising to 2 tonnes for dense plastic [Defra]. In 2019/20 489,465 tonnes of total waste incinerated in Edmonton led to between 348,925 & 598,158 tonnes of CO<sub>2</sub> released.

Incinerators with ERS are treated as power stations, but unlike actual power stations gain exemptions from inclusion in UKETS.

*In NLWA Forecasting Model, high recycling scenario was 50% and the low 40% by 2021. Why was even the 40% not achieved?*

*With currently 70% of residual black bag waste incinerated but recyclable [Defra], of which 12% maybe plastic, how is the Borough intending to persuade residents to increase recycling beyond 2022?*

*Why no **RWRP** for 2022 to 2050?*

*The Model high scenario target of 60% by 2030/1 and constant thereafter until 2050/1. Is this because waste streams are needed to feed the ERF and contractual obligations regardless of inter-generational equity?*

**5. No complete Risk Analysis**, given the potential tax liability of residents if project fails:

- i. Investment risk:** With likely huge future SE Region overcapacity [Lewisham, Bexley, Sutton, Essex, Hoddeston, Slough ...= 950k tonnes), there is uncertainty over source of 700k source waste feedstock, given the likely increased competition and 65% 2030 recycling target. PWLB may not fund projects with such risk.
- ii.** If CCS facility technology fails to deliver or BEIS does not approve financial support

- iii. **If CMA referral successful** by finding contract with Acciona anti-competitive  
Is there a Plan B?
- iv. **UKETS's aim** is to incentivise cost-effective emissions reductions. Currently incineration has an exemption from the Scheme. However:
- EU is consulting on including incineration in EU ETS
  - Norway is considering inclusion
  - High Court has ruled, after challenge to include incineration in UKETS, which law as stands does not oblige. However a future Government could change their mind, given commitments to Net Zero by 2050.
  - All-Party Parliamentary Group on Air pollution called in their **Pollution from Waste Incineration Report [12/21]** for a halt on incineration building in London. Evidence given recommended inclusion in UKETS.
  - Shouldn't LBWF, as a Net Zero Borough, itself advocate and press the Government for inclusion of incineration. Both landfill and incineration are emitters of Global Warming gases. Taxing one without the other creates **perverse incentives and is contrary to the Polluter Pays Principle.**

*With inclusion in UKETS, what would be the cost and viability implications for the project? Why hasn't this been considered in the LP1?*

*If wholly or partially cancelled, what are the contractual penalties?*

*What would be the implications for Borough finances and future Council tax levels?*

**b) Some remedies to improve soundness:**

**STRATEGIC OBJECTIVES p13**

Re 14. Insert “...***commits to contributing to the achievement of net zero emissions and...***” in:

“...Waltham Forest ***commits to contributing to the achievement of net zero emissions and*** builds its resilience through addressing sustainability, efficient waste management and the effects of climate change through all stages in the development process”

**Policy 95 – Waste management**

**Insert:**

***“ F. Working with NLWA, the Council will not agree to contracts that result in the Edmonton Incinerator facility importing waste from outside of the partnership boroughs for commercial and operational gain, but rather will only do so for proven contribution to achieving London’s net sustainability.***

***G. Waltham Forest Council’s strategy has a presumption in favour of sustainable development [Policy 1]. In line with this and our commitment to net zero CO2 emissions, our aim to significantly increase recycling and the movement towards a circular economy, the Council will accordingly campaign and plan for all incineration to be included in the UKETS carbon trading scheme.”***