Waste and the North London Waste Plan

Thirteen years on and there is every indication that the NLWP is further away from approval than ever. This note outlines one of the reasons why.

Net Self Sufficiency (NSS) is the agreed strategy of the NLWP (and London). While not defined, the principle of NSS is straightforward: waste will inevitably flow across administrative borders but NSS means you provide waste management capacity equivalent to the waste you produce. It is the case that:

- North London's waste management capacity presently far exceeds its generated waste (by 55%).
- That same capacity is protected by policy and so forms a minimum level when looking ahead.
- The London Plan also requires this existing capacity be intensified, ie increased on the same land footprint. This reemphasises, and also further underpins, north London's current capacity.
    - Existing capacity can therefore at the very worst flat line into the future.
- Generated waste on the other hand is decreasing - ex Commercial & Industrial - and now forms an established trend in Local Authority Collected. (The latter before the inevitable CV19 one-off household clear-out blip.)
    - Any acceleration towards a circular economy will additionally reduce absolute waste levels.

The inescapable conclusion is that a NSS strategy requires no fresh waste land in north London.

November's NLWP EIP massaged this fact to generate an apparent need for fresh land by a number of techniques, including:

- Significantly over planning versus the required needs of London (the apportionment).
- Basing LACW forecasts not on those of the London Plan but rather highly caveated Eunomia data developed exclusively for the Edmonton Incinerator; data now revealed to be unsupportable.
- Ignoring policy protecting existing waste land.
- Ignoring the London Plan requirement of existing capacity intensification.

The NLWP then went much further in its Waste Data Study (WDS), the detailed industry analysis supporting its call for fresh land. The WDS set out in granular-estimation an approach based on waste type and waste management type. A resulting 31 point annual grid was forecast across the plan period identifying waste management capacity surplus, or gaps, in each of the resulting, almost 500, matrix cells (31*15). This level was required to ensure some capacity gaps emerged and therefore required an apparent resulting land need. The London Plan, by comparison, has only three cells.

The list of assumptions is many and effectively unsupportable. At one simple level, many waste facilities support more than one type of waste, that can and does change; but not in the WDS's.

More fundamentally, the WDS bears no relevance to the NSS strategy. A highly convoluted numeric study had been developed to produce an apparent need for extra waste land but it had no link to the NLWP's chosen strategy: follow NSS and the WDS is irrelevant - there is no need for extra waste land; conversely, accept the approach in the WDS and its apparent fresh land need, and the strategy behind the NLWP falls.

Sustainability Appraisal, Duty to Cooperate and pretty much everything else flows from this choice; it is a NLWP wholesale rewrite whichever of these two conflicting core elements of the NLWP is chosen.

As a corollary, the greater the capacity of the Edmonton incinerator, and by implication the greater the level of waste imports needed to supply it, then, under a NSS strategy, both these metrics result in further dampening the NLWP's requirement for fresh waste land, such as that long desired at Pinkham Way.

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