

Preparation of local plan for waste in North London

General / Content

A plan will have at heart a core format: what is the issue being addressed, what is the environment it is being prepared under (internal as well as external factors), what are the options, what and why is one option the chosen route and all ultimately leading to implementation be it operational or policies. The new-NLWP should be little different.

The issue in this case is self-evidently waste and its management. The core issue here is then what waste levels we have / expect to have, what is available currently for its management and over what term(s), what that implies in terms of (any) fresh need and if there is fresh need where and what form that could take.

Much of this is core (invariant) data. The previous reports (to include NLJWS as well as NLWA sole reports) suffer from duplication of material which at times changed and at others failed to align one report to the other.

For material such as historic waste levels (by category, eg MSW, Household, C&I) as well as forecasts a single source document is appropriate. This would ideally be extended to include current / historic (where available) site detail and go on to include site area, capacity, licensed capacity, and throughput, both actual and potential.

Waste levels and existing sites also have futures. In the case of waste levels a central scenario will be expected but it is unrealistic to work to a single data set and base any plan implications about that alone. The forecast will be wrong. Key drivers – population / demographics, Political Risk, technological change, industry trends and such can be highlighted and reasonable implications drawn to generate a forecast “fan” to include any central scenario. When assessing options the implication of a non-central waste forecast coming to fruition can be assessed and its probability drawn in making any conclusions. It may make economic sense to plan to meet a lower than central scenario subject to a reasonable contingency plan for any extra waste.

Current waste sites would also be highlighted for their potential changes: capacity, throughput, type and physical land extension opportunity.

Waste composition, both historic and future (fanned) expectations would be included as part of the core data set.

Apportionment detail / requirements similarly highlighted.

A summary of key Risks and Opportunities to the future operating environment along with their implications for waste levels / type and sites should be included.

In aggregate this should provide a single data source highlighting “where we are and where we expect to get to as well as what we have / could have to manage it”. For a Land Plan little else may prove necessary.

Conformity and Integration

Waste Collection and Waste Disposal are symbiotic. Much of the last period has been characterised by two sides of the same coin arguing independence while necessarily acknowledging a degree of co-working and co-dependency. The link of new-NLWP / NLWA disposal should be made explicit and acknowledged.

In turn both are linked to the 8 Authority NLJWS. The new-NLWP hearings, slated for spring 2016, will occur towards the end of the current NLJWS's term. The operating environment, a fundamental input to any plan (see paragraph one) is stale and rapidly coming to the end of its stated lifetime. As part of the work a reappraisal as a minimum, if not a simultaneous redrafting (strategic reappraisal or review) of the NLJWS, would be entirely appropriate.

The world now being faced and expected in the medium term is significantly different on key dimension to that faced and expected even 5 years back. That change must be identified and encapsulated for a viable long term plan.

(New) Site Selection

This assumes new sites are either required or appropriate in the light of the waste collection and / or disposal strategies.

The key factors are identified, eg, minimise noise and other external factors to others, use existing land in preference to new and so forth. It may be that a set of (weighted) criterion for both positives as well as negatives are required. These should however be maintained independently of each other and not netted or otherwise set off to reach a single score from which a table of appropriateness follows. Keeping the two sets independent means that real risks (cost) and real benefits can be viewed site by site and not carry the potential to be hidden by a counter weighting.

Overarching Policies and guidance, in particular the Proximity Principle and the Waste Hierarchy must be included and assessed alongside any decision and if then ignored or downplayed clearly shown as to why and with what compensating benefit, financial and otherwise, occurs.

Land is a finite and hugely valuable resource within London. It should not be "banked" in anticipation of what may be – or not – so requiring a conservative view be taken versus a central waste and existing site scenario.

Land requirements would additionally benefit from an awareness of (any) available capacity or potential future capacity within the Region but outside of the sub Region. The London Plan and its requirements operates at the Regional level.

Apportionment

A borough by borough Apportionment was calculated by the GLA based on a fair assessment of each borough. Within the NLWA sub region that work was then unapportioned and then reapportioned on a differing basis. Outlining why and associated benefits / disbenefit and cost implications to taxpayers if this is followed in the new-NLWP should be outlined.

Option generation

Given the different levels of intensity from differing processes it seems inconceivable to contemplate this element of planning without full and detailed integration of a simultaneous strategy from the Disposal Authority.

The current scenario (April 2013) risks having an anticipatory disposal site selection plan, including new purchase / build, in place long before the new-NLWP has concluded whether such is necessary. As this can reasonably be expected to have a four decade lifetime there risks considerable undermining of the new-NLWP process. Bringing both processes into line and based on a strategic review of the NLJWS appears the sole logical way forward to remove unnecessary financial risk to taxpayers.

Types and Size of Facilities

Such a decision will inevitably be linked to waste make up; future trends eg reasonably anticipated removal of plastic from the waste stream; plus existing or nearby sites and so forth. Effectively, is any needed.

To optimise the position for taxpayers in considering any new fleet of sites the aspects of scale economies and in particular the scale economies relating to specific aspects of a process (travel, weighbridge, operating process etc) need to be identified and carefully weighed.

Notable from its absence in any documentation in specifics rather than simply in passing, how this differs, and can reasonably be forecast to change through time, by type of facility will be a major influence.

Collection

The types and benefits / disbenefit of particular waste collection means and what that could mean for a fleet of sites should be included.

Travel

Cost of transport from household (in particular) to site(s) will be a major consideration. This will be particularly so in a more centralised, few sites, versus more decentralised more site analysis. Such an analysis should be included showing relative cost implications as well as other factors such as respective influence on local populations.

Option Evaluation

And it's all pulled together with clear rationale as to why Option N is self-evidently the most appropriate together with an outline of its risks and implementation issues.

Why all other options, including do nothing if that is the situation, are excluded should be clearly outlined.