Cllr Clyde Loakes <Cllr.Clyde.Loakes@walthamforest.gov.uk> From: 16 November 2021 14:10 Sent: To: ; Cllr Masood Ahmad; Cllr Hather Ali; Cllr Umar Ali; Cllr Liaquat Ali; Cllr Raja Anwar; Cllr Mohammed Asghar; Cllr Naheed Asghar; Cllr Elizabeth Baptiste; Cllr Tony Bell; Cllr Karen Bellamy; Cllr Kastriot Berberi; Cllr Roy Berg; Cllr Emma Best; Council Leader; Cllr Tom Connor; Cllr Shabana Dhedhi; Cllr Rosalind Dore; Cllr Paul Douglas; Cllr Jacob Edwards; Cllr Patrick Edwards; Cllr Marion Fitzgerald; Cllr Ros Flowers; Cllr Mitchell Goldie; Cllr Jenny Gray; Cllr Nick Halebi; Cllr Andrew Hemsted; Cllr Jemma Hemsted; Cllr Whitney Ihenachor; Cllr Kay Isa; Cllr Tim James; Cllr Ahsan Khan; Cllr Johar Khan; Cllr Joe Lacey-Holland; Cllr Khevyn Limbajee; Cllr Sally Littlejohn; Cllr Gerry Lyons; Cllr Asim Mahmood; Cllr Saima Mahmud; Cllr Anna Mbachu; Cllr Simon Miller; Cllr Louise Mitchell; Cllr John Moss; Cllr Jonathan ODea; Cllr Yemi Osho; Cllr Marie Pye; Cllr Keith Rayner; Cllr Zia-Ur Rehman; Cllr Chris Robbins; Cllr Catherine Saumarez; Cllr Selina Seesunkur; Cllr Alan Siggers; Cllr Alistair Strathern; Cllr Richard Sweden; Cllr.Vicky te Velde; Cllr Steve Terry; Cllr Sharon Waldron; Cllr Terry Wheeler; Cllr Grace Williams Cc: Jeremy CORBYN; ; kate.osamor.mp@parliament.uk; lain DUNCAN SMITH; camdenfoe@gmail.com; ; Shirley Rodrigues; Leonie Cooper; ; Richard Bradbury; Cllr ClimateEmergencyCamden; Diakides Isidoros; geraint.davies.mp@parliament.uk; Alan WHITEHEAD; ed.miliband.mp@parliament.uk; stephen.barclay.mp@parliament.uk; Sharon HODGSON; daniel@danielzeichner.co.uk; Ruth JONES; Robbie MOORE; Alex SOBEL; ; cllr.d.cohen@barnet.gov.uk; cllr.kate.anolue@enfield.gov.uk; cllr.hass.yusuf@enfield.gov.uk; mete.coban@hackney.gov.uk; robert.chapman@hackney.gov.uk; Cllr Hakata Mike; rowena.champion@islington.gov.uk; satnam.gill@islington.gov.uk; Stop The Edmonton Incinerator Now; john.cryer.mp@parliament.uk; stella creasy **Subject:** RE: Acciona CEO acknowledges 'massive oversizing' of Edmonton incinerator

Dear

Thank you for your email and my apologies in the delay in responding to you.

The proposals for the Edmonton EcoPark included in the North London Heat and Power Project (NLHPP) represent the only green solution for north London's unrecyclable waste to tackle the climate emergency, prevent rubbish going to landfill and reduce air pollution. The North London Waste Authority (NLWA) are building the greenest energy recovery facility in the country which will generate electricity for the national grid equivalent to powering 127,000 homes, and heat to a district network that supplies heat and hot water to up to 50,000 local homes and businesses.

The NLHPP also sees the largest public sector investment in state of the art, modern recycling infrastructure London has seen in decades, if ever, with the Resource Recovery Facility and a further recycling centre to add to our network of recycling centres, the largest in London. Both of these facilities along with a new, on site, education centre are already being built. The NLWA is also at the forefront, in London and nationally, of waste prevention activity. Examples include the Annual Waste Prevention Exchange, the London Upcycling Show and our 'swishing' and other activities around fast fashion and clothing reuse. We are also making strides in removing more difficult and complex waste from the residual waste stream like mattresses and polystyrene for example- whilst others talk, we're acting.

Your email misrepresents comments made by the CEO of Acciona, Mr José Manuel Entrecanales, in relation to the NLWA's project. I want to make sure you have the full facts about this important project for north London, and the compelling environmental benefits it will provide.

Mr Entrecanales was questioned with a series of misleading statements and asked to comment on the North London Heat and Power Project, which Acciona are currently bidding for.

For clarity, Acciona submitted in October 2021 a tender to NLWA to build the new Energy Recovery Facility at Edmonton EcoPark. The tender reflects the Authority's requirements, as the Authority is best placed to specify the capacity and technology to meet the needs of north London's two million residents. NLWA are in the final stages of evaluating the tender to confirm if Acciona meets the requirements of the procurement, which include the rigorous technological standards specified by NLWA's Members. In fact none of the subsequent 20 energy recovery facilities given planning permission since ours in 2017-including the 753,000 tonnes South Humber Bank Energy Centre that was given its Development Consent Order just last week by the Secretary of State- comes even close to the emission and environment technology we have specified and expect to be deploying through this procurement.

The NLWA has already responded in detail to the claims outlined in your email, so it is disappointing that you would knowingly repeat inaccurate statements. These claims also falsely represent the statements expressed as Mr Entrecanales's opinion. All arguments presented to Mr Entrecanales have been thoroughly studied and considered in the decision to rebuild an energy from waste facility which was given consent by the Secretary of State for Business, Energy and Industrial Strategy in 2017.

I have provided our clear response to each of these claims below:

Claim: "the facility is massively oversized and NLWA will need to import waste from other areas"

NLWA response: the claim is wrong. NLWA has carried out detailed forecasts, which take into account higher recycling rates in the future. The ERF is sized on this basis, in line with north London's needs. Our analysis was accepted by the independent Planning Inspectorate. If society moves more quickly to reduce waste, our facility can still operate with lower volumes. It doesn't need to run at full capacity, so we won't need to "import waste".

Claim: "Mayor of London has vocally come out against the project".

Response: the Mayor of London has not opposed our project. In fact, he confirmed in October that he is working with NLWA to ensure the facility maximises heat output, and employs the best available techniques to reduce pollution. Our project is an important part of and is included within the Mayor's Environment Strategy, which seeks to stop waste being sent to landfill and instead managed within London by the mid-2020s.

Claim: "it's cheaper to burn waste than recycle it".

NLWA response: this simply isn't true in north London. Our waste contracts ensure the exact opposite – recycling costs less per tonne to boroughs than disposal. We always prioritise waste prevention and recycling above disposal. But for the waste that isn't recycled, we need a responsible plan. Our new ERF will help tackle the Climate Emergency by converting rubbish into low-carbon heat and electricity for thousands of homes.

Claim: "incineration is an old technology"

NLWA response: modern Energy Recovery Facilities like ours at the very forefront of efforts to protect the planet. They are part of the Net Zero transition advocated by the UK's Climate Change Committee. And our sister facility in Copenhagen was recently praised as a beacon for positive action to improve air urban air quality in David Attenborough's BBC *Earthshot Prize* film. Our ERF will use the same modern technologies as the Copenhagen plant, and we are proud to be building the most advanced facility of its type in the UK, in line with Europe's best.

Claim: "incineration doesn't remove dioxins"

NLWA response: this claim is completely at odds with the performance of modern energy from waste plants generally and our facility specifically. Our ERF will carefully control combustion at high temperatures to minimise the formation of dioxins and furans. Any that are formed are removed through our employment of advanced emission controls."

In conclusion, we echo Mr Entrecanales's statement that energy from waste facilities are the only solution as the world transitions away from producing large volumes of rubbish- 67 double decker buses of waste are generated in London, every hour of every day alone. This is the exact approach we are bringing forward in north London, alongside our massive efforts to reduce waste and promote recycling. This includes the new recycling facilities under construction right now at the Edmonton EcoPark, mentioned previously, which are absolutely essential if north London is to hit its 50% recycling and above.

Opponents of the NLHPP have continued to not provided a workable alternative for north London's rubbish. We have to be clear that all alternatives would inevitably have higher environmental impacts – whether through landfill, unproven technologies or using less advanced energy from waste sites. As countries around the world sign up to Cop-26 methane reduction pledges, we simply can't pause and review a project with major environmental benefits, and risk instead our residents' rubbish being sent to landfill. Our residents rightly expect better than this.

More information about the NLHPP can be found on the NLWA website <u>here</u> and our project specific site <u>here</u>, and I would be very happy to assist with any further questions you may have.

Kind regards,

Cllr Clyde Loakes Chair NLWA

From:

Sent: 12 November 2021 20:48

To: Cllr Masood Ahmad <Cllr.Masood.Ahmad@walthamforest.gov.uk>; Cllr Hather Ali

<Cllr.Hather.Ali@walthamforest.gov.uk>; Cllr Umar Ali <Cllr.Umar.Ali@walthamforest.gov.uk>; Cllr Liaquat Ali

<Cllr.Liaquat.Ali@walthamforest.gov.uk>; Cllr Raja Anwar <Cllr.Raja.Anwar@walthamforest.gov.uk>; Cllr

Mohammed Asghar <Cllr.Mohammad.Asghar@walthamforest.gov.uk>; Cllr Naheed Asghar

<Cllr.Naheed.Asghar@walthamforest.gov.uk>; Cllr Elizabeth Baptiste

<Cllr.Elizabeth.Baptiste@walthamforest.gov.uk>; Cllr Tony Bell <Cllr.Tony.Bell@walthamforest.gov.uk>; Cllr Karen Bellamy <Cllr.Karen.Bellamy@walthamforest.gov.uk>; Cllr Kastriot Berberi

<Cllr.Kastriot.Berberi@walthamforest.gov.uk>; Cllr Roy Berg <Cllr.Roy.Berg@walthamforest.gov.uk>; Cllr Emma Best

<Cllr.Emma.Best@walthamforest.gov.uk>; Council Leader <Leader@walthamforest.gov.uk>; Cllr Tom Connor

<Cllr.Tom.Connor@walthamforest.gov.uk>; Cllr Shabana Dhedhi <Cllr.Shabana.Dhedhi@walthamforest.gov.uk>; Cllr Rosalind Dore <Cllr.Rosalind.Dore@walthamforest.gov.uk>; Cllr Paul Douglas

<Cllr.Paul.Douglas@walthamforest.gov.uk>; Cllr Jacob Edwards <Cllr.Jacob.Edwards@walthamforest.gov.uk>; Cllr Patrick Edwards <Cllr.Patrick.Edwards@walthamforest.gov.uk>; Cllr Marion Fitzgerald

<Cllr.Marion.Fitzgerald@walthamforest.gov.uk>; Cllr Ros Flowers <Cllr.Ros.Flowers@walthamforest.gov.uk>; Cllr Mitchell Goldie <Cllr.Mitchell.Goldie@walthamforest.gov.uk>; Cllr Jenny Gray

<Cllr.Jenny.Gray@walthamforest.gov.uk>; Cllr Nick Halebi <Cllr.Nick.Halebi@walthamforest.gov.uk>; Cllr Andrew Hemsted <Cllr.Andrew.Hemsted@walthamforest.gov.uk>; Cllr Jemma Hemsted

<Cllr.Jemma.Hemsted@walthamforest.gov.uk>; Cllr Whitney Ihenachor

<Cllr.Whitney.Ihenachor@walthamforest.gov.uk>; Cllr Kay Isa <Cllr.Kay.Isa@walthamforest.gov.uk>; Cllr Tim James <Cllr.Tim.James@walthamforest.gov.uk>; Cllr Ahsan Khan <CllrAhsan.Khan@walthamforest.gov.uk>; Cllr Johar Khan

<Cllr.Johar.Khan@walthamforest.gov.uk>; Cllr Joe Lacey-Holland <Cllr.Joe.Lacey-Holland@walthamforest.gov.uk>;

Cllr Khevyn Limbajee <Cllr.Khevyn.Limbajee@walthamforest.gov.uk>; Cllr Sally Littlejohn

<Cllr.Sally.Littlejohn@walthamforest.gov.uk>; Cllr Clyde Loakes <Cllr.Clyde.Loakes@walthamforest.gov.uk>; Cllr Gerry Lyons <Cllr.Gerry.Lyons@walthamforest.gov.uk>; Cllr Asim Mahmood

<Cllr.Asim.Mahmood@walthamforest.gov.uk>; Cllr Saima Mahmud <Cllr.Saima.Mahmud@walthamforest.gov.uk>; Cllr Anna Mbachu <Cllr.Anna.Mbachu@walthamforest.gov.uk>; Cllr Simon Miller

<Cllr.Simon.Miller@walthamforest.gov.uk>; Cllr Louise Mitchell <Cllr.Louise.Mitchell@walthamforest.gov.uk>; Cllr John Moss <Cllr.John.JC.Moss@walthamforest.gov.uk>; Cllr Jonathan ODea

<Cllr.Jonathan.ODea@walthamforest.gov.uk>; Cllr Yemi Osho <Cllr.Yemi.Osho@walthamforest.gov.uk>; Cllr Marie Pye <Cllr.Marie.Pye@walthamforest.gov.uk>; Cllr Keith Rayner <Cllr.Keith.Rayner@walthamforest.gov.uk>; Cllr Zia-Ur.Rehman@walthamforest.gov.uk>; Cllr Chris Robbins

<Cllr.Chris.Robbins@walthamforest.gov.uk>; Cllr Catherine Saumarez

<Cllr.Catherine.Saumarez@walthamforest.gov.uk>; Cllr Selina Seesunkur

<Cllr.Selina.Seesunkur@walthamforest.gov.uk>; Cllr Alan Siggers <Cllr.Alan.Siggers@walthamforest.gov.uk>; Cllr Alistair Strathern <Cllr.Alistair.Strathern@walthamforest.gov.uk>; Cllr Richard Sweden

<Cllr.Richard.Sweden@walthamforest.gov.uk>; Cllr.Vicky te Velde <Cllr.Vicky.TeVelde@walthamforest.gov.uk>; Cllr Steve Terry <Cllr.Steve.Terry@walthamforest.gov.uk>; Cllr Sharon Waldron

<clir.sharon.waldron@walthamforest.gov.uk>; Clir Terry Wheeler <clir.terry.wheeler@walthamforest.gov.uk>; Clir</clir.terry.wheeler@walthamforest.gov.uk></clir.sharon.waldron@walthamforest.gov.uk>
Grace Williams <cllr.grace.williams@walthamforest.gov.uk></cllr.grace.williams@walthamforest.gov.uk>
Cc: Jeremy CORBYN <jeremy.corbyn.mp@parliament.uk>;</jeremy.corbyn.mp@parliament.uk>
kate.osamor.mp@parliament.uk; lain DUNCAN SMITH <iain.duncansmith.mp@parliament.uk>;</iain.duncansmith.mp@parliament.uk>
camdenfoe@gmail.com;
; Shirley Rodrigues <shirley.rodrigues@london.gov.uk>; Leonie Cooper</shirley.rodrigues@london.gov.uk>
<pre><leonie.cooper@london.gov.uk>; ClimateEmergencyCamden <cecamden@googlegroups.com>;</cecamden@googlegroups.com></leonie.cooper@london.gov.uk></pre>
;
Richard Bradbury <richard.bradbury@camden.gov.uk>; isidoros.diakides@haringey.gov.uk;</richard.bradbury@camden.gov.uk>
geraint.davies.mp@parliament.uk; ; Alan
WHITEHEAD <alan.whitehead.mp@parliament.uk>; ed.miliband.mp@parliament.uk;</alan.whitehead.mp@parliament.uk>
stephen.barclay.mp@parliament.uk; Sharon HODGSON <sharon.hodgson.mp@parliament.uk>;</sharon.hodgson.mp@parliament.uk>
daniel@danielzeichner.co.uk; Ruth JONES <ruth.jones.mp@parliament.uk>; Robbie MOORE</ruth.jones.mp@parliament.uk>
<pre><robbie.moore.mp@parliament.uk>; Alex SOBEL <alex.sobel.mp@parliament.uk>; peter.zinkin</alex.sobel.mp@parliament.uk></robbie.moore.mp@parliament.uk></pre>
cllr.d.cohen@barnet.gov.uk; cllr.kate.anolue@enfield.gov.uk; cllr.hass.yusuf@enfield.gov.uk;
mete.coban@hackney.gov.uk; robert.chapman@hackney.gov.uk; mike.hakata@haringey.gov.uk;
rowena.champion@islington.gov.uk; satnam.gill@islington.gov.uk; Stop The Edmonton Incinerator Now
<notoxicsmoke@gmail.com>; john.cryer.mp@parliament.uk; stella creasy <stella@workingforwalthamstow.org.uk></stella@workingforwalthamstow.org.uk></notoxicsmoke@gmail.com>
Subject: Acciona CEO acknowledges 'massive oversizing' of Edmonton incinerator

Dear Waltham Forest Councillors,

Dear Cllrs Gray, Pye and Loakes,

Dear Cllr Rayner and members of the Budget and Performance Scrutiny Committee,

Dear Cllr Ali and members of the Health Scrutiny Committee,

Dear London Assembly members,

Dear Sir Keir Starmer and John Cryer,

In about 5 weeks, on **16 December 2021**, the board of the North London Waste Authority will most probably be voting to award the contract for the construction of the Edmonton incinerator to the only remaining bidder, Madrid-based Acciona.

It may thus be of interest to you that on Monday of this week (8 November 2021), Acciona's CEO, José Manuel Entrecanales, acknowledged during a COP26 panel event that the proposed plant is significantly larger than required:

José Manuel Entrecanales, CEO of Acciona: "The massive oversizing of the [Edmonton] plant is something that is beyond our control. It's a specific issue of the plant. About the waste-to-energy concept, you would probably agree with me that it's a transition mechanism — maybe not in London, that is a debatable argument." (see the video at https://www.facebook.com/georgia.elliottsmith/videos/315655960389417/?d=n)

This frank admission from the head of one of world's foremost infrastructure and renewable energy firms calls into question:

- the validity of the waste and treatment capacity estimates used to justify the proposed plant, and
- the very notion that London should expand energy-from-waste incineration capacity.

At a minimum, residents deserve an independent environmental and social impact assessment based on the latest available evidence and technology, not the flawed projections used by the North London Waste Authority in 2015, when it applied for permission to construct the incinerator. The world has moved on.

The sizing of the plant may be "beyond the control" of Acciona, which has not drawn up the tender process for the plant, but surely it is not beyond the control of the North London Waste Authority and its board members. The constituents of Waltham Forest have a right to value for money, especially at a time when alternative waste treatment options and surplus incineration capacity are available.

We look to Waltham Forest to lead the way in calling for a waste treatment strategy that is fit for purpose. **As a matter of urgency**, please:

- insist on a pause of the procurement process
- review the most recent evidence and projections of waste arisings and treatment capacity

- contact the Mayor for up-to-date data
- ask Acciona to explain why they consider the current plant massively oversized and what they would propose
 instead.

You can help do the right thing for the people and the planet. We look forward to hearing from you.



Leytonstone resident and member of the Stop the Edmonton Incinerator Now coalition

Additional information

"Massive oversizing." That the proposed plant is too large should come as no surprise, given that the North London Waste Authority itself has admitted that, in contrast to waste projections, which forecast an increase in household waste, actual arisings in north London have decreased despite population growth:

North London Waste Authority: "When the NLJWS [North London Joint Waste Strategy] 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." (page 7 of https://www.nlwa.gov.uk/sites/default/files/inline-files/annual-monitoring-report-2018 19-final-v2.pdf)

"Debatable argument." As the CEO of Acciona noted, the argument that new energy-from-waste incineration capacity ought to be built in London can be challenged, especially given that the proposed Edmonton incinerator would:

- pump 700,000 tonnes of CO2 per year into the atmosphere the equivalent of adding 250,000 diesel cars
 to our roads for more than 30 years when emissions need to be cut drastically if the UK is to meet its
 zero-carbon pathway targets
- produce energy that is **four times as carbon-intensive** as energy from the grid
- release toxins such as dioxins, furans, NOx, and particulate matter into the air, regardless of the use of stateof-the-art technology and despite a growing awareness that these pollutants shorten lives and increase the
 disease burden, especially in the local population
- cement environmental racism and social injustice by being sited in Edmonton one of the UK's most deprived and racially diverse areas
- perpetuate a linear economy and thus hamper the transition to a more circular economy, which Defra's waste strategy seeks to drive by prioritizing waste prevention, reuse and repair, and recycling, as well as introducing collection and packaging reforms (extended producer responsibility, deposit return schemes, and consistency in collections)
- **deprive north Londoners of desperately needed green jobs**, since the waste disposal sector provides only a fraction of the jobs generated by the reuse, repair, and recycling sectors
- **assure energy-from-waste overcapacity** for London, as forecast by Mayor Sadiq Khan, given that the 2nd Cory facility has added 805,000 tonnes of incineration capacity that the London Plan does not factor in and that render the Edmonton plant **entirely superfluous and unjustifiable**
- lock north London's residents into an unnecessarily expensive and financially risky waste treatment regime for decades to come, especially if the plant becomes a stranded asset because waste arisings continue to decline, the UK transitions away from waste disposal, and/or the government introduces a tax on carbon and/or waste incineration.

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