

North London Waste Authority
**North London Heat and Power
Project**

Preliminary Environmental
Information Report
Volume 1 Appendix 5.1 General
Assessment Methodology

Issue for Consultation

May 2015

Arup

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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Volume 1 Appendix 5.1 General Assessment Methodology

1.1 Engagement

Vol 1 Appendix 5.1 Table 1 sets out comments received from stakeholders relating to the general assessment methodology of the EIA. The table also provides detail of how the comments have been addressed in the PEIR. Comments relating to topics are provided within Volume 2 assessment methodologies.

Vol 1 Appendix 5.1 Table 1: EIA general engagement comments

Organisation and date	Comment	Response
Secretary of State (SoS) (November 2014)	The SoS considers that the information required under Regulation 8(3) of the EIA Regulations, for a request for scoping opinion, has been provided in the NLHPP Scoping Report	The NLHPP Scoping Report which was undertaken in line with the EIA Regulations is publically available. The Scoping Opinion issued by SoS is provided in Vol 1 Appendix 1.1.
	<i>“The ES submitted by the applicant should demonstrate consideration of the points raised by the consultation bodies. It is recommended that a table is provided in the ES summarising the scoping responses from the consultation bodies and how they are, or are not, addressed in the ES.”</i>	Scoping comments relating the general EIA approach are provided within this table. Topic-related comments and responses are provided within the relevant topic appendix of Volume 2. The topic tables follow the format of this table.
	<i>“Any consultation responses received after the statutory deadline for receipt of comments will not be taken into account within this Opinion. Late responses will be forwarded to the applicant and will be made available on the Planning Inspectorate’s website. The applicant should also give due consideration to those comments in carrying out the EIA.”</i>	All comments received from statutory consultees have been reviewed and taken into consideration as part of the EIA consultation process.
	<i>“The construction period is expected to generate approximately 390 full time equivalent construction jobs (although the capital expenditure used to calculate this has not yet been confirmed).”</i> <i>“The Scoping Report details the number of full time equivalent construction jobs expected to be generated by the proposal, but does not confirm how this figure was calculated. The Secretary of State requests that this information is provided in the ES.”</i>	The capital expenditure for the NLHPP has been used to recalculate the FTE construction jobs, details (including method of calculation) are reported within Vol 2 Section 8 (Socio-Economics).
	<i>“Information regarding the employees and works required to maintain the proposed development have not been included in the Scoping Report.”</i>	Details of maintenance including number of employees and maintenance works were not confirmed at the time of scoping.

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	<p><i>“Information on the operation and maintenance of the proposed development should be included in the ES and should cover but not be limited to such matters as: the number of full/part-time jobs; the operational hours and if appropriate, shift patterns; the number and types of vehicle movements generated during the operational stage.”</i></p>	<p>Information on the operation and maintenance of the NLHPP, including the number of employees, is provided in Vol 1 Section 3.</p>
	<p><i>“In addition to detailed baseline information to be provided within topic specific chapters of the ES, the Secretary of State would expect the ES to include a section that summarises the site and surroundings. This would identify the context of the proposed development, any relevant designations and sensitive receptors. This section should identify land that could be directly or indirectly affected by the proposed development and any associated auxiliary facilities, landscaping areas and potential off site mitigation or compensation schemes.”</i></p>	<p>Vol 1 Section 2 sets out details of the existing site and surrounds, this includes details of designations and receptors.</p> <p>Vol 1 Section 3 identifies the land that would be used or acquired for the Project.</p>
	<p><i>“The ES should include a clear description of the application site which is to be the subject of the DCO, including detailed land levels, hard surfaces and existing vegetation species.”</i></p> <p><i>“The applicant should ensure that the description of the proposed development that is being applied for is as accurate and firm as possible as this will form the basis of the environmental impact assessment. [...] the description of the development in the ES must be sufficiently certain to meet the requirements of paragraph 17 of Schedule 4 Part 1 of the EIA Regulations and there should therefore be more certainty by the time the ES is submitted with the DCO.”</i></p>	<p>A full description of the proposed development including the NSIP and associated development are contained within Vol 1 Section 3.</p> <p>Details of land levels and hard surfaces are provided within the Vol 2 Section 10 (Water Resources and Flood Risk) and accompanying appendices.</p> <p>Details of existing vegetation species are described within the Ecology assessment in Vol 2 Section 4.</p>
	<p><i>“A map included as Appendix A2.2 of the Scoping Report identifies environmental designations in relation to the site. For the purposes of the ES, the Secretary of State recommends that all environmental designations identified are clearly annotated on a map; and that in the case of European sites, the ES includes their distances from the site and a description as to why each site has been designated. The inclusion of the AQMA on the map in Appendix A2.2 is welcome. However, the map is unclear as to</i></p>	<p>The plans produced for the Scoping Report have been reviewed and revised for the PEIR to address SoS’ comments and to ensure that they are clear and reflect the proposed development that will be submitted for application for development consent. The environmental designation plan is provided in Vol 1 Figure 2.2.</p> <p>A description of the environmental designations is included in Vol 1 Section 2.2.</p>

Organisation and date	Comment	Response
	<p>where exactly the AQMA applies because of the pale shading used. Figures use in the ES should be clearly legible with appropriate use of shading and keys”</p>	
	<p>“ [...]The Secretary of State considers that understanding the relationship between the existing facility and the proposed development is extremely important. The ES should therefore clearly explain the likely timing and characteristics of development on site during each stage of construction and the likely stage(s) of works that represent the worst case scenario for potential effects on the environment.”</p> <p>“The ES should also explain how the facility is able to continue operating following the demolition of what appear to be key components of the energy from waste process.”</p>	<p>Vol 1 Section 3.5 sets out the key development phases for the Project. For each phase there is a description of the construction/demolition works to be undertaken (where relevant) and a description of the state of operation of the waste management facility during the phase (i.e. whether the current, new facility or both facilities would be operational). All project development phases are assessed in the EIA.</p>
	<p>“If a draft DCO is to be submitted, the applicant should clearly define what elements of the proposed development are integral to the NSIP and which is ‘associated development’ under the Planning Act 2008 (PA 2008) or is an ancillary matter.”</p> <p>“The Secretary of State recommends that the ES should include a table which summarises how the proposed mitigation measures will be delivered (e.g. through requirements in the draft DCO).”</p>	<p>Vol 1 Section 3.2 sets out the defined Project including the elements that constitute the NSIP and associated development.</p> <p>The ES will include a table which will summarise how the proposed mitigation measures will be delivered once final topic assessments have been completed based on the final DCO design.</p>
	<p>“The Secretary of State recommends that the ES should include a clear description of all aspects of the proposed development, at the construction, operation and decommissioning stages, and include:”</p> <ul style="list-style-type: none"> • Land use requirements; • Site preparation; • Construction processes and methods; • Transport routes; • Operational requirements including the main characteristics of the production process and the nature and quantity of materials used, as well as waste arising’s and their disposal; • Maintenance activities including any potential environmental impacts; and • Emissions - water, air and soil pollution, noise, vibration, light, heat, radiation.” 	<p>Vol 1 Section 3.5 sets out the characteristics of the development at the various project phases including assumptions related to decommissioning.</p>

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	<p><i>“The Secretary of State recommends that the EIA covers the life span of the proposed development, including construction, operation and decommissioning and the potential environmental effects arising during each stage of the proposed development.”</i></p>	
<p>Secretary of State, National Health Service (NHS) (November 2014)</p>	<p><i>“The Secretary of State notes that the ES does not describe the likely volume of waste that the new facility is expected to process. This should be described in the ES, including how it has been calculated (in terms of its composition and calorific value). The ES should also explain how the volume of waste translates into the number and size of delivery vehicles required and the size/design of the proposed development (e.g. in respect of stockpiling/storage areas).”</i></p> <p><i>NHS - How is the waste (particularly the ash from the disused clinical waste plant) going to be disposed of?” (Appendix 2)</i></p>	<p>Details of the volumes of waste that the new facility would process are included within Vol 1 Section 3.3. This includes a summary of vehicle numbers, further detail on which can be found in the Interim Transport Report located in Vol 2 Appendix 9.2.</p> <p>The disused clinical waste plant would be removed from the site as part of the Project.</p>
<p>Secretary of State (November 2014)</p>	<p><i>“At this stage the proposals involve the use of air or water cooled condensers. The ES should describe the proposed method and physical characteristics of the cooling infrastructure. The applicant should consult with the Environment Agency in respect of the positioning and design of any water abstraction and discharge points. The rates at which water would be abstracted and discharged should also be defined. It should also be clear as to whether there is evidence of agreement with the Environment Agency that the development parameters and rates are valid and that the assessment is based on the worst case scenario for potential effects. The rate of mains water use (Paragraph 13.3.15 of the Scoping Report) should be clarified.”</i></p> <p><i>“The Secretary of State notes that it is proposed to relocate the existing London Waste Limited vehicle depot and service facilities. The ES should describe the existing uses within these buildings, including the number of people employed. It should also describe where and how the buildings/uses will be relocated and whether the number of people employed in the buildings will change.”</i></p>	<p>Vol 1 Section 3.3 sets out the proposed condenser technology, water abstraction and discharge points (including rates) and rate of mains water use.</p> <p>The cooling condenser technology will not be selected until after Phase 2 consultation. Both technologies are therefore assessed in the PEIR.</p> <p>The relocation of the London Waste Limited vehicle depot and would be undertaken as part of reconfiguration of the site and alternative parking provided on-site within the parking areas. There would be no relocation off-site.</p>

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	<p><i>“The Secretary of State notes the separate plans for the Lee Valley Heat Network (LVHN) and Decentralised Energy Network (DEN) on or in the vicinity of the proposal site. The relationship between these developments and the proposal should be explained fully in the ES.”</i></p>	<p>Details of the relationship between NLHPP and LVHN/DEN is contained within Vol 1 Section 3.2. The LVHN is considered within the cumulative assessment for the EIA.</p>
	<p><i>“The Secretary of State notes and welcomes the reference in Paragraph 4.5.3 of the Scoping Report that information on the alternatives considered will be included in the ES.”</i></p>	<p>Details of alternatives are provided in Vol 1 Section 4.</p>
	<p><i>“Where the details of the scheme cannot be defined precisely the EIA should assess the likely worst case scenario. The applicant’s attention is drawn to Advice Note 9 ‘Using the ‘Rochdale Envelope’ which is available on the Planning Inspectorate’s website and to the ‘Flexibility’ section in Appendix 3 of this Opinion which provides additional details on the recommended approach.”</i></p>	<p>The EIA has been undertaken in line with the Rochdale Envelope principle. Further details on how this approach has been applied are provided in Vol 1 Section 3.4.</p>
	<p><i>“The applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the scheme have yet to be finalised and provide the reasons. At the time of application, any proposed scheme parameters should not be so wide ranging as to represent effectively different schemes. The scheme parameters will need to be clearly defined in the draft DCO and therefore in the accompanying ES. It is a matter for the applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the proposed development in the ES must not be so wide that it is insufficiently certain to comply with requirements of paragraph 17 of Schedule 4 Part 1 of the EIA Regulations.”</i></p>	<p>Vol 1 Section 3.4 sets out the parameters assumed and assessed within the EIA with reference to the Book of Plans which sets out the parameters, e.g. maximum height of stack or maximum depth of bunker. The parameters have been defined in order to ensure a robust ES that is compliant with EIA Regulations.</p>
	<p><i>“It should be noted that if the proposed development changes substantially during the EIA process, prior to application submission, the applicant may wish to consider the need to request a new scoping opinion.”</i></p>	<p>The proposed development set out in Vol 1 Section 3 has not changed substantially compared to that presented within the Scoping Report.</p>
	<p><i>“Paragraph 3.2.10 of the Scoping Report explains that the proposed development includes an upgrade to the electricity connection to the National Grid. The characteristics of the existing connection or the likely upgrade to this are not described however. There is also no information provided in relation to the existing connection,</i></p>	<p>Upgrade works to the electricity connection to the National Grid would be undertaken by UK Power Networks (UKPN) in accordance with their statutory obligations. These works would be pursued under UKPNs statutory powers</p>

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	<p><i>including how it currently connects to the electricity grid. The Secretary of State requests that this information is included in the ES and encourages the applicant to consult with National Grid to ensure the upgrade satisfies any technical requirements and to discuss the potential for impacts and how these should be assessed in the ES. Attention is drawn to the consultation response from National Grid (see Appendix 2 of this Opinion) which notes the presence of National Grid assets within or in proximity to the proposed DCO limits and includes specific recommendations regarding the design of the proposed development.”</i></p>	<p>and therefore they are not included in the Application Site boundary.</p>
	<p><i>“The Secretary of State notes that three access points are currently being considered for both construction and operation, although it is not clear whether more than one access will be used. The ES should detail the impacts of each option considered, including the worst-case impacts. The ES should also describe the likely type, nature and extent of any other works necessary to construct the accesses (e.g. demolition works, widening, road closures, footpath/pipeline diversions and tree felling).”</i></p>	<p>Vol 1 Section 3.3 sets out the access points to be used during each project development phase for construction and operational traffic. This enables the impacts to be fully assessed within topic assessments, including of the works necessary to construction the accesses.</p>
	<p><i>“The Secretary of State notes that no information has been provided in the Scoping Report regarding the size and location of construction compounds. Whilst it is appreciated that this information may not be available at this stage in the evolution of the project, applicants are reminded that this information will be required and should be included in the DCO boundary.”</i></p>	<p>Assumptions relating to construction of each phase are provided in Vol 1 Section 3.5. The construction laydown/compound area are included in the DCO boundary.</p>
	<p><i>“The Secretary of State considers that information on construction including: phasing of programme; construction methods and activities associated with each phase; siting of construction compounds (including on and off site); lighting equipment/requirements; and number, movements and parking of construction vehicles (both HGVs and staff) should be clearly indicated in the ES.”</i></p>	<p>As described above this information is provided in Vol 1 Section 3.5.</p>
	<p><i>“The Secretary of State recommends that consultation is undertaken with all relevant regulatory authorities and their advisors, in order to agree wherever possible the assessment methodology (e.g. the timing and relevance of survey work) and the</i></p>	<p>As part of the EIA engagement has been undertaken with statutory stakeholders to discuss the scope of the assessments including assessment methodologies. Details of engagement is provided in each of the topic</p>

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	<p><i>need, design and likely effectiveness of mitigation proposals. The ES should identify clearly how consultation responses have been taken into account in the assessment and in the identification/design of any necessary measures to mitigate any potential adverse effects”</i></p>	<p>sections in Volume 2 which includes tables setting out stakeholder comments and responses to those comments.</p>
	<p><i>“The Secretary of State recommends that the physical scope of the study areas should be identified under all the environmental topics and should be sufficiently robust in order to undertake the assessment. The extent of the study areas should be on the basis of recognised professional guidance, whenever such guidance is available. The study areas should also be agreed with the relevant consultees and, where this is not possible, this should be stated clearly in the ES and a reasoned justification given. The scope should also cover the breadth of the topic area and the temporal scope, and these aspects should be described and justified.”</i></p>	<p>Assessment areas are set out within each topic assessment methodology contained in Volume 2. Justification for the assessment areas is provided within each topic assessment.</p>
	<p><i>“Matters are not scoped out unless specifically addressed and justified by the applicant, and confirmed as being scoped out by the Secretary of State”.</i></p>	<p>The scope of the EIA is set out in Vol 1 Section 5; this reflects the Scoping Opinion provided by the SoS.</p>
	<p><i>“The decisions taken by the Secretary of State above do not prevent the applicant from subsequently agreeing with the relevant consultees to scope matters out of the assessment, where further evidence is provided to justify this approach. Any such justification should be explained clearly and fully in the ES.”</i></p>	<p>The justification for the scope of the assessment is provided in Vol 1 Section 5 and relevant topic assessments in Volume 2.</p>
	<p><i>“In order to demonstrate that topics have not simply been overlooked, where topics are scoped out prior to submission of the DCO application (including those identified in the Scoping Report), the ES should still explain the reasoning and justify the approach taken. This should include reference to how the delivery of measures proposed to prevent/minimise adverse effects is secured through DCO requirements and whether relevant consultees agree on the adequacy of the measures proposed. Draft versions of documents (e.g. a draft Method Statement or Code of Construction Practice) relied upon in the assessment should be appended to the ES.”</i></p>	<p>Details of the scope of the assessment, including where topics have been scoped out (including justification for scoping out and details of engagement undertaken with stakeholders on the matter) are included in Vol 1 Section 5.</p> <p>The Interim CoCP is appended to the PEIR (Vol 1 Appendix 3.1).</p>

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	<p><i>“The relevant NPSs (EN-1 and EN-3) for the proposed development set out both the generic and technology-specific impacts that should be considered in the EIA for the proposed development. When undertaking the EIA, the applicant must have regard to both the generic and technology-specific impacts and identify how these impacts have been assessed in the ES.”</i></p>	<p>The EIA methodology (including topic sections) take into consideration the NPS EN-1 and EN-3 as recommended. Details of how the relevant policies have been addressed are set out in within this appendix and also in Volume 2 topic assessment methodology appendices.</p>
	<p><i>“The proposed structure and/or chapter headings of the ES are not described in the Scoping Report. The Secretary of State notes that from the structure of the Scoping Report that the EIA would cover a number of assessments under the broad headings of:</i></p> <ul style="list-style-type: none"> <i>• Air Quality and Odour”</i> <i>• Archaeology and Cultural Heritage</i> <i>• Ecology</i> <i>• Ground Conditions and Contamination</i> <i>• Noise and Vibration</i> <i>• Socio-Economics</i> <i>• Townscape and Visual Impacts</i> <i>• Traffic and Transport</i> <i>• Water Resources</i> <i>• Waste Management</i> <i>• Environmental Wind</i> <i>• Daylight, Sunlight and Overshadowing” (para 3.16)</i> <p><i>“The Secretary of State draws attention to the recommended approach to the cumulative effects assessment, as set out in Appendix 3 to this Opinion.”</i></p> 	<p>An overview of the content of the ES was provided in Section 4.5 of the Scoping Report. The structure of the PEIR takes into consideration the suggested headings.</p> <p>Appendix 3 of the Scoping Opinion aligns with the information set out in the Infrastructure Planning EIA Regulations 2009. Appendix 3 has been taken into consideration in the development of the PEIR structure which is set out in Vol 1 Section 1.</p> <p>With regard to the cumulative effects assessment, the approach applied to this assessment is set out in Vol 1 Section 5.2 and Vol 1 Appendix 5.1 which is consistent with Appendix 3 of the Scoping Opinion.</p>
	<p>Sites of Special Scientific Interest (SSSIs): Where there may be potential impacts on the SSSIs, the Secretary of State has duties under sections 28(G) and 28(I) of the Wildlife and Countryside Act 1981 (as amended) (the W&C Act) to take reasonable steps to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which the site is of special scientific interest.</p> <p>The Secretary of State must notify the relevant nature conservation body (NCB), NE in this case, before authorising the carrying out of operations likely to damage the special interest features of a SSSI.</p>	<p>Potential impacts on SSSIs are considered in the Habitats Regulation Assessment (HRA) (see Interim Screening Statement for HRA) and Vol 2 Section 4 (Ecology).</p>

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	<p>European Protected Species (EPS): the applicant may wish to provide information which will assist the decision maker to meet the duty under the Planning Act 2008 (PA 2008) to engage with the Habitats Directive. Applicants are encouraged to consult with NE and, where required, to agree appropriate requirements to secure necessary mitigation. The applicant is responsible for ensure draft licence applications are satisfactory for the purposes of informing formal pre-application assessment by NE.</p> <p>Other regulatory regimes: <i>The Secretary of State recommends that the applicant should state clearly what regulatory areas are addressed in the ES and that the applicant should ensure that all relevant authorisations, licences, permits and consents that are necessary to enable operations to proceed are described in the ES. Also it should be clear that any likely significant effects of the proposed development which may be regulated by other statutory regimes have been properly taken into account in the ES.</i></p> <p>Transboundary impacts: <i>“The Secretary of State has noted that the applicant has considered whether the proposed development is likely to have significant impacts on another European Economic Area (EEA) State. [...]The Secretary of State recommends that the ES should include a section which considers the potential for significant transboundary impacts. The EEA States which could be affected by these impacts should be identified.”</i></p>	<p>It is not currently considered that any European Protected Species Mitigation licences will be required for the proposed development.</p> <p>Details of other required consents are set out in Vol 1 Section 1.4.</p> <p>Vol 1 Section 5.3 considers the potential for significant transboundary impacts.</p>
<p>Secretary of State, English Heritage (November 2014)</p>	<p>Archaeology; <i>“We note that the scoping report for archaeology concludes that the overall effect is not significant, despite deposits with potential to contain archaeological remains being present, because of their depth on the proposed ERF site (2-3m or more below the modern ground surface). No further archaeological work is recommended. However, this conclusion seems premature. The construction of the ERF will be a major engineering operation; to conclude without full design details that without any mitigation measures it will not significantly affect buried remains only a few meters below the surface seems highly unlikely”.</i></p>	<p>A geoarchaeological study has been undertaken to gain a better understanding of the potential for archaeological remains across the site. The desk-based assessment presented in the Scoping Report has been updated with this information (see Vol 1 Appendix 5.3). Further engagement will be undertaken with the Greater London Archaeological Advisory Service (GLAAS) to seek agreement to scope out archaeology of the EIA. The outcome of these discussions will be reported in the ES.</p>

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	<p>Archaeology: <i>“We are concerned that the archaeological potential of the site (table 5) appears restricted to settlement activity not other types of archaeological interest, and that the discovery of important and nationally important remains in the Lea valley floor is given insufficient weight - for example the DBA does not refer to the major geoarchaeological study of the lower Lea valley published by Museum of London Archaeology in 2011”.</i></p>	<p>As above</p>
	<p>Archaeology: <i>“We therefore recommend that archaeology should not be scoped out at this stage. Instead the ES should include an updated assessment with a geoarchaeological deposit model prepared by a suitably qualified specialist, which should make use of the MOLA study and recent geoarchaeological work on nearby sites (e.g. Deephams Sewage Works and Meridian Waters) to more accurately assess the site's potential. As further information on construction impact becomes available it should be possible to identify where mitigation measures might be necessary”.</i></p>	<p>As above.</p>
	<p>Built heritage, Townscape and Visual Impacts: <i>“The report identifies Chingford Mill and associated heritage assets (grade II) as the most likely to be impacted by the proposed development of the ERF. We agree this is likely to be the case. However, we feel that the lack of details of the proposed ERF development, and particularly information that would allow comparison between existing and proposed developments, does not allow appropriate judgements to be made”.</i></p> <p><i>“Appendix A3.2 refers to the new buildings only, and the drawings are indicative. Therefore, the potential impact on the setting of Chingford Mill cannot be appropriately assessed. We would also expect that comparative analysis would be contained within the Landscape and Visual section, Appendix A11. The photographs, however, provide information for the existing facility only. The potential for impacts on views from Chingford Mill, and for its significance to be affected, cannot yet be understood from the information provided. While there may not be a substantial change in the use of the site proposed for the EDF, as stated in para 6.3.10, a significant change in scale of the facility (as compared to the</i></p>	<p>With regard to effects on the setting of Chingford Mill Pumping Station, a viewpoint has been added at this location as reported in the Visual assessment (Volume 3). With regard to setting impacts, this is considered to demonstrate the negligible change that would occur in the setting of the Chingford Mill Pumping Station listed buildings (see Vol 1 Appendix 5.3). It is proposed that this will be also discussed with Historic England with a view to agreeing that cultural heritage can be scoped out of the EIA on this basis. The outcome of these discussions will be reported in the ES.</p>

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	<p><i>present structures) could result in an impact that requires assessment in the EIA".</i></p> <p><i>"While we recognise that the effects on the archaeological resource and cultural heritage may not be constitute significant impacts, we do not feel that sufficient information is yet available to be able to understand whether this is the case. We advise therefore that these aspects should not yet be scoped out without further information".</i></p>	<p>As described above, further work has been undertaken on the potential for archaeological and cultural heritage effects. This is being shared and discussed with GLAAS and Historic England and it is on this basis that it is hoped that agreement can be reached to scope out Archaeology and Cultural Heritage from the EIA. Should agreement not be reached to scope out this topic then a topic assessment will be prepared for inclusion in the ES.</p>
<p>Secretary of State (November 2014)</p>	<p>Waste management: <i>"The environmental effects of all wastes to be processed and removed from the site should be addressed. The ES will need to identify and describe the control processes and mitigation procedures for storing and transporting waste off site. All waste types should be quantified and classified."</i> (para 2.34)</p>	<p>Details of the wastes to be processed and removed from the site are set out in Vol 1 Section 3.</p> <p>The environmental effects from wastes processed and removed from the site are assessed in the EIA topics, primarily in Air Quality and Odour (Vol 2 Section 2), Noise and Vibration (Vol 2 Section 7) and Ground Conditions and Contamination (Vol 2 Section 6) assessments. Effects relating to transport are addressed within the Transport Assessment (Vol 2 Section 9).</p> <p>It is therefore considered that there is no requirement for a separate Waste Management assessment within the EIAs environmental effects from waste are considered within the topic assessments referred to above.</p>
	<p>Waste management: <i>"[...] The Secretary of State does agree however, that the following matters can be scoped out, on the basis that potential impacts from any related works/activities are unlikely to be significant: [...] Waste Management (during operation) (note: this relates only to waste generated by the plant and not its waste management function)."</i> (para 3.10 bullet ii)</p>	<p>Noted.</p>
	<p>Waste Management: <i>"the Scoping Report does not address the potential for significant environmental effects that could arise from the demolition of the existing facility, which could generate a significant Vol of waste requiring disposal. Given the current and previous uses on the site, there is the potential for the generation of</i></p>	<p>Details of the wastes from demolition are set out in Vol 1 Section 3.</p> <p>As above, the environmental effects from wastes generated from demolition are assessed in the Air Quality and Odour (Vol 2 Section 2), Noise and Vibration (Vol 2</p>

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	<i>hazardous waste which could result in significant adverse effects.” (para 3.11 bullet vii)</i>	Section 7) and Ground Conditions and Contamination (Vol 2 Section 6) assessments. Effects relating to transport are addressed within the Transport Assessment (Vol 2 Section 9). The potential for the generation of hazardous waste is considered in the Ground Conditions and Contamination assessment (Vol 2 Section 6).
	Waste Management: <i>“The applicant is encouraged to prepare a Site Waste Management Plan (SWMP) and this should be appended to the ES.” (para 3.71)</i>	The requirements for a SWMP is captured in the Interim CoCP (see Vol 1 Appendix 3.1).
	Waste Management: <i>“The Secretary of State encourages the applicant to discuss their proposed approach with the Environment Agency and the Council, to establish an appropriate methodology and evaluation criteria and ensure that all types of wastes and their effects are considered.” (para 3.72)</i>	As described above it is considered that the environmental effects of the waste processed by the Project are assessed in the Air Quality and Odour (Vol 2 Section 2), Noise and Vibration (Vol 2 Section 7) and Ground Conditions and Contamination (Vol 2 Section 6) assessments. Effects relating to transport are addressed within the Transport Assessment (Vol 2 Section 9). Proposed assessment methodologies have been discussed with relevant topic stakeholders where appropriate, details of which are contained in the topic assessments.
	Waste Management: <i>“It is essential that the assessment accounts for materials to be removed from the site and to identify where potential traffic movements would be routed. Such details should also be reflected in relevant supporting documents (e.g. the SWMP)”. (para 3.73)</i>	This information is contained in the Interim Transport Report (Vol 2 Appendix 9.2) and the Interim CoCP (Vol 1 Appendix 3.1).
	Waste Management: <i>“Some of the effects linked to waste (e.g. on air or water quality) would be covered in other chapters of the ES. The interrelationship between the chapter on waste and these other chapters should be clearly explained in the ES and cross referenced, where appropriate”. (para 3.74)</i>	An interactive effects assessment is contained in Vol 2 Section 11.
	Waste Management: <i>“The ES should describe any mitigation measures necessary to deal with adverse impacts and identify any residual effects. The ES should also make it clear how mitigation measures would be secured and delivered in the DCO”. (para 3.75)</i>	As described in Vol 1 Section 3.4, draft DCO requirements will be included in the ES which make clear how mitigation measures would be secured and delivered in the DCO.

Organisation and date	Comment	Response
Environment Agency (November 2014)	<p>Environment Agency - <i>"We are conscious that the proposed capacity within waste bunkers on site has increased since the original design for the site. [...] We would encourage this storage capacity to be kept to a minimum to meet the operational requirements as this has been raised as a criticism of other developments where the plant was over sized for the required capacity. Has a reduced throughput been considered to last 5 days rather than continue operating at maximum capacity?"</i></p> <p><i>We would suggest that the remediation of the existing waste bunker is considered at an early stage. Restoration to existing ground levels via placement of mixed construction wastes within the bunker would not be acceptable as this would be regarded as a landfill which would not be acceptable in this location. We strongly recommend this is discussed with us to consider options for remediation."</i> (Appendix 2)</p>	The design of the NLHPP has been developed in consultation with the Environment Agency. Details relating to the design are set out in Vol 1 Section 3.
Canal and River Trust (November 2014)	<p><i>"[...] the Canal & River Trust considers that the following information should be provided as part of the environmental statement:</i></p> <ul style="list-style-type: none"> <i>• Feasibility/viability study for the transport of waste and materials using the blue ribbon network during the demolition/construction phase and the operational phase following completion;</i> <i>• Information about how the proposal will affect the use of the wharf that is leased by the Edmonton Sea Cadets during both the construction period and following completion".</i> (Appendix 2) 	<p>A water transport feasibility study that has been undertaken by NLWA (described in Vol 1 Section 3.3) has been discussed with the Canal and River Trust. Details of this engagement is provided in Vol 2 Section 9.</p> <p>Vol 1 Section 3.5 sets out how the Edmonton Sea Cadets would be affected during each project development phase (e.g. where they would be located) and Vol 2 Section 8 (Socio-Economics) provides an assessment of the impacts of the Project on the Edmonton Sea Cadets.</p>
The Planning Inspectorate (February 2015)	<p><i>"We are content that the methodology proposed will identify relevant projects and help to ensure that they are considered in the assessment. It should also help to minimise the potential for issues being raised during any future Examination and the delays that this could cause (e.g. in terms of more assessment work needing to be undertaken). The proposal to update the project schedule following consultation on the Preliminary Environmental Information Report (scheduled for May/June 2015) is therefore also welcomed."</i></p> <p><i>"We note and welcome the proposal to include the designated Meridian Water redevelopment area to the south of the site within the assessment. It is noted that the Masterplan for this development</i></p>	<p>Noted. The project schedule will be updated following consultation on the PEIR for final topic assessments to be presented in the ES.</p> <p>Noted. It is confirmed that the Meridian Water redevelopment area is included in the cumulative effects assessment.</p>

Organisation and date	Comment	Response
	<p><i>will be used as a basis for the assessment but that individual planning applications will also be taken into account if and when they occur. In these circumstances the Environmental Statement (ES) should conduct the assessment based on the best available information and acknowledge any limitations to the assessment as necessary. The assessment should also be based on the potential worst case impacts for these developments.”</i></p>	
	<p><i>“We note that the proposed Lee Valley Heat Network (LVHN) and the De-centralised Energy Network (known as the energy centre) fall within the draft DCO site boundary, but will be subject to a separate planning application which is expected to come forward before the DCO application. The Planning Inspectorate supports the inclusion of these projects in the cumulative impact assessment. The developments should be assessed in the ES using best available information and irrespective of whether the planning applications are submitted before or after the DCO application. Where precise details remain unknown the assessment should be based on a realistic worst case assumption.”</i></p>	<p>Noted. It is confirmed that the LVHN/DEN is included in the cumulative effects assessment.</p>
	<p><i>“Section 3.2 of the Note explains that a 600 metres radius area from the site has been used to identify other developments to be included in the cumulative assessment. The use of the 600 metre radius area for identification of other developments is based on the locality of residential receptors and is otherwise without justification and appears arbitrary. The Planning Inspectorate expects that impacts, pathways, interactions and receptors are considered in order to determine the study area and other developments to be assessed. The use of a single strictly applied distance does not reflect the dynamic nature of the impacts and receptors concerned. For example it is typical for air quality impacts to extend several kilometres from major emitters. This approach provides greater consideration of other types of receptor (e.g. ecological), which may be affected at a much greater distance from the site through other pathways e.g. water and air.”</i></p>	<p>The 600m radius area is explained in Vol 1 Section 5.2. While development information is provided within a 600m radius of the application boundary, topics have considered appropriate areas for their assessments, for example the Air Quality and Odour and Visual assessments consider cumulative effects over a radius greater than 600m (with appropriate development information obtained) – the appropriate cumulative effects assessment area for each topic is explained in the topic methodology sections in Volume 2.</p>
<p>Transport for London (February 2015)</p>	<p><i>“Thanks for consulting TfL on this technical note. Once you confirmed your assumptions about committed developments, TfL would be interested to discuss how these assumptions will be</i></p>	<p>A meeting was held with TfL in March 2015 to discuss the basis of the cumulative effects assessment for the Transport Assessment (which provides input to the Air</p>

Organisation and date	Comment	Response
	<i>translated into the Transport Assessment in terms of traffic figures and other assumptions.”</i>	Quality and Noise and Vibration assessments). Further details are provided in Vol 2 Section 9.

1.2 Legislation and guidance

Vol 1 Appendix 5.1 Table 2 and Vol 1 Appendix 5.1 Table 3 contain the NPS policy requirements of EN-1 and EN-3 of relevance to the general EIA methodology. The tables also provide details of how the comments have been addressed in the assessment. Details of policy requirements of relevance for each environmental topic scoped into the EIA for NLHPP are set out in each topic assessment methodology appendix in Volume 2.

Vol 1 Appendix 5.1 Table 2: NPS EN-1 requirements

Requirements of NPS EN-1	How the requirement is addressed	Location of where to find further detail
<p>Para 4.1.3 – ‘In considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the IPC should take into account:</p> <ul style="list-style-type: none"> its potential benefits including its contribution to meeting the need for energy infrastructure, job creation and any long-term or wider benefits; and its potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.’ 	<p>The potential benefits and adverse effects are discussed in Vol 1 Section 6 (summary of significant effects) and Volumes 2 and 3 (topic assessments).</p>	<p>Vol 1 Section 1 Vol 1 Section 6 Vol 2 Section 2 to 10 Vol 3</p>
<p>Para 4.1.4 – ‘In this context, the IPC should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels. These may be identified in this NPS, the relevant technology-specific NPS, in the application or elsewhere (including in local impact reports).</p>	<p>Environmental benefits of the Project are set out in Vol 1 Section 6 (summary of significant effects) and Volumes 2 and 3 (topic assessments). The social and economic benefits are specially considered in Vol 2 Section 8.</p>	<p>Vol 1 Section 6 Vol 2 Section 2 to 10 Vol 3</p>
<p>Para 4.2.1 – ‘All proposals for projects that are subject to the European Environmental Impact Assessment Directive must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project. The Directive specifically refers to effects on human beings, fauna and flora, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them. The Directive requires an assessment of the likely</p>	<p>The likely significant effects from the NLHPP are provided within this PEIR. The assessment has been undertaken in line with the EIA Directive and EIA regulations.</p>	<p>Vol 1 Vol 2 Section 2 to 10 Vol 3</p>

Requirements of NPS EN-1	How the requirement is addressed	Location of where to find further detail
<p>significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects.'</p>		
<p>Para 4.2.2 – 'To consider the potential effects, including benefits, of a proposal for a project, the IPC will find it helpful if the applicant sets out information on the likely significant social and economic effects of the development, and shows how any likely significant negative effects would be avoided or mitigated. This information could include matters such as employment, equality, community cohesion and well-being.'</p>	<p>A summary of the likely significant effects is provided in Vol 1 Section 6. Details of the assessments are provided in Volumes 2 and 3. Mitigation is set out where appropriate. Topic-specific environmental design for the avoidance of significance effects is also described in Volumes 2 and 3.</p>	<p>Vol 1 Section 6 Vol 2 Section 2 to 10 Vol 3</p>
<p>Para 4.2.3 – 'For the purposes of this NPS and the technology-specific NPSs the ES should cover the environmental, social and economic effects arising from pre-construction, construction, operation and decommissioning of the project. In some circumstances (for example, gas pipe-lines) it may be appropriate to assess effects arising from commissioning infrastructure once it is completed but before it comes into operation'</p>	<p>The assessment presented in this PEIR considers all phases of the Project including decommissioning. The key project phases are set out in Vol 1 Section 3.5.</p>	<p>Vol 1 Section 3.5 Vol 2 Section 2 to 10 Vol 3</p>
<p>Para 4.2.4 – 'When considering a proposal the IPC should satisfy itself that likely significant effects, including any significant residual effects taking account of any proposed mitigation measures or any adverse effects of those measures, have been adequately assessed. In doing so the IPC should also examine whether the assessment distinguishes between the project stages and identifies any mitigation measures at those stages. The IPC should request further information where necessary to ensure compliance with the EIA Directive.'</p>	<p>The key project phases are set out in Vol 1 Section 3.5. All project phases are assessed in the EIA.</p> <p>Details of the proposed development, including 'embedded mitigation' (environmental design) are set out in Vol 1 Section 3 and in topic assessments in Volumes 2 and 3.</p>	<p>Vol 1 Section 3 Vol 2 Section x.6 of each topic assessment. Vol 3 Section x.6 of visual assessment</p>

Requirements of NPS EN-1	How the requirement is addressed	Location of where to find further detail
<p>Para 4.2.5 – ‘When considering cumulative effects, the ES should provide information on how the effects of the applicant’s proposal would combine and interact with the effects of other development (including projects for which consent has been sought or granted, as well as those already in existence)77. The IPC may also have other evidence before it, for example from appraisals of sustainability of relevant NPSs or development plans, on such effects and potential interactions. Any such information may assist the IPC in reaching decisions on proposals and on mitigation measures that may be required.’</p>	<p>The approach to the cumulative assessment is set out in Vol 1 Section 5.3 and Vol 1 Appendix 5.2. Potential cumulative effects are set out in the topic assessments in Volumes 2 and 3.</p>	<p>Vol 1 Section 5.3 Vol 2 Section x.12 of each topic assessment. Vol 3 Section x.12 of visual assessment</p>
<p>Para 4.2.6 – ‘The IPC should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.’</p>	<p>An assessment of interactive effects is provided in Vol 2 Section 11.</p>	<p>Vol 2 Section 11</p>
<p>Para 4.2.7 – ‘In some instances it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case.’</p>	<p>The project parameters for which approval is sought upon which the EIA is based are contained in the Book of Plans and described in Vol 1 Section 3.</p>	<p>Vol 1 Section 3</p>
<p>Para 4.2.8 – ‘Where some details are still to be finalised the ES should set out, to the best of the applicant’s knowledge, what the maximum extent of the proposed development may be in terms of site and plant specifications, and assess, on that basis, the effects which the project could have to ensure that the impacts of the project as it may be constructed have been properly assessed.’</p>	<p>The project parameters for which approval is sought upon which the EIA is based are contained in the Book of Plans and described in Vol 1 Section 3. This sets out the maximum extent of the proposed development.</p>	<p>Vol 1 Section 3</p>
<p>Para 4.3.1 – Prior to granting a development consent order, the IPC must, under the Habitats and Species Regulations, consider whether the project may have a significant effect on a European site, or on any site to which the</p>	<p>An assessment of whether the NLHPP may have significant effects on European site, or on any site to which the same protection is applied is provided in the Habitats Regulation Assessment (HRA). The HRA also includes</p>	<p>Interim Screening Statement for HRA</p>

Requirements of NPS EN-1	How the requirement is addressed	Location of where to find further detail
<p>same protection is applied as a matter of policy, either alone or in combination with other plans or projects.</p> <p>The applicant should seek the advice of Natural England, and provide the IPC with such information as it may reasonably require to determine whether an Appropriate Assessment is required. In the event that an Appropriate Assessment is required, the applicant must provide the IPC with such information as may reasonably be required to enable it to conduct the Appropriate Assessment. This should include information on any mitigation measures that are proposed to minimise or avoid likely effects.'</p>	<p>details of engagement that has been undertaken with Natural England.</p>	

Vol 1 Appendix 5.1 Table 3: NPS EN-3 requirements

Requirements of NPS EN-3	How the requirement is addressed	Location of where to find further detail
Para 2.3.3 – ‘EfW generating stations may also require significant water resources, but are less likely to be proposed for coastal sites. For these proposals applicants should consider, in particular, how plant will be resilient to: increased risk of flooding; and, increased risk of drought affecting river flows.’	An assessment of the NLHPP’s resilience to climate change is considered in the Flood Risk Assessment.	Vol 2 Appendix 10.2 (Flood Risk Assessment)
Para 2.3.5- ‘Section 4.8 of EN-1 advises that the resilience of the project to climate change should be assessed in the Environmental Statement (ES) accompanying an application. For example, the impact of increased risk of drought as a result of higher temperatures should be covered in the water quality and resources section of the ES.’	As above	As above
Para 2.4.2 – ‘Proposals for renewable energy infrastructure should demonstrate good design in respect of landscape and visual amenity, and in the design of the project to mitigate impacts such as noise and effects on ecology.’	Details of the proposed development, including landscape design are set out in Vol 1 Section 3. Details of the proposed development, including ‘embedded mitigation’ (environmental design) are set out in Vol 1 Section 3 and in topic assessments in Volumes 2 and 3.	Vol 1 Section 3. Vol 2 Section x.6 of each topic assessment. Vol 3 Section x.6 of visual assessment.
Para 2.5.13 – ‘Throughput volumes are not, in themselves, a factor in IPC decision-making as there are no specific minimum or maximum fuel throughput limits for different technologies or levels of electricity generation. This is a matter for the applicant. However the increase in traffic volumes, any change in air quality, and any other adverse impacts as a result of the increase in throughput should be considered by the IPC in accordance with this NPS and balanced against the net benefits of the combustion of waste and biomass.’	Details of traffic volumes associated with the proposed development are set out in Vol 1 Section 3.5 and Vol 2 Section 9 (Transport). Subsequent changes in air quality, and any other adverse impacts because of the increased throughput from the Project are assessed in Volume 2, in particular Section 2 (Air Quality and Odour) and Section 7 (Noise and Vibration).	Vol 1 Section 3 Vol 2 Section 9 Vol 2 Section 2 Vol 2 Section 7
Para 2.5.23 – ‘Applicants will usually have assured themselves that a viable connection exists before submitting the development proposal to the IPC and where they have not done so, they take that commercial risk. In	Upgrade works to the electricity connection to the National Grid would be undertaken by UK Power Networks (UKPN) in accordance with	Vol 1 Section 3

Requirements of NPS EN-3	How the requirement is addressed	Location of where to find further detail
accordance with Section 4.9 in EN-1, any application to the IPC must include information on how the generating station is to be connected and whether there are any particular environmental issues likely to arise from that connection.'	their statutory obligations. These works would be pursued under UKPNs statutory powers and therefore they are not included in the Application Site boundary.	
Para 2.5.23 – 'Government policy encourages multi-modal transport and the IPC should expect materials (fuel and residues) to be transported by water or rail routes where possible. (See Section 5.13 of EN-1 on transport impacts). Applicants should locate new biomass or waste combustion generating stations in the vicinity of existing transport routes wherever possible. Although there may in some instances be environmental advantages to rail or water transport, whether such methods are viable is likely to be determined by the economics of the scheme. Road transport may be required to connect the site to the rail network, waterway or port. Therefore, any application should incorporate suitable access leading off from the main highway network. If the existing access is inadequate and the applicant has proposed new infrastructure, the IPC will need to be satisfied that the impacts of the new infrastructure are acceptable.'	A water transport feasibility study has been undertaken by NLWA; this is described in Vol 1 Section 3.3. Water transport feasibility is also discussed in the Interim Transport Report that is provided in Vol 2 Appendix 9.2.	Vol 1 Section 3.3. Vol 2 Section 9.
Para 2.5.30 – 'Generic information on flexibility is set out in Section 4.2 of EN-1. The IPC should accept that biomass/waste combustion plant operators may not know the precise details of all elements of the proposed development until some time after any consent has been granted. Where some details have not been included in the application to the IPC, the applicant should explain which elements of the scheme have yet to be finalised and give the reasons. Therefore, some flexibility may be required in the consent. Where this is sought and the precise details are not known, then the applicant should assess the effects the project could have (as set out in EN-1 paragraph 4.2.8) to ensure that the project as it may be constructed has been properly assessed. In this way the maximum-adverse	The project parameters for which approval is sought upon which the EIA is based are contained in the Book of Plans and described in Vol 1 Section 3. This sets out the maximum extent of the Project.	Vol 1 Section 3

Requirements of NPS EN-3	How the requirement is addressed	Location of where to find further detail
<p>case scenario will be assessed and the IPC should allow for this uncertainty in its consideration of the application and consent.'</p>		
<p>Para 2.5.33 – 'In sites with nationally recognised designations (Sites of Special Scientific Interest, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty and Registered Parks and Gardens), consent for renewable energy projects should only be granted where it can be demonstrated that the objectives of designation of the area will not be compromised by the development, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits.'</p>	<p>The NLHPP would not be located within sites of nationally recognised designations.</p> <p>Vol 1 Section 2.2 sets out details of designations surrounding the site. Potential impacts on these ecologically designated sites are considered in the HRA and Vol 2 Section 4 (Ecology).</p>	<p>Interim Screening Statement for HRA Vol 2 Section 4</p>
<p>Para 2.5.34 – 'In considering the impact on the historic environment as set out in Section 5.8 of EN-1 and whether it is satisfied that the substantial public benefits would outweigh any loss or harm to the significance of a designated heritage asset, the IPC should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the national targets for renewable energy supply and emissions reductions.'</p>	<p>As set out in the Scoping Report, built heritage impacts were proposed to be scoped out of the EIA on the basis of the Project not presenting a substantial change to the current use of the site and therefore it is not considered that more than a negligible change would occur in the setting of the Chingford Mill Pumping Station listed buildings. The Scoping Opinion raised concerns about the potential impact on the setting of Chingford Mill suggesting that a viewpoint is included in the assessment for this location to enable setting impacts to be confirmed. This viewpoint has been included in the Visual assessment (Vol 3), the setting impacts of which are reported in Vol 1 Section 5.1 and Vol 1 Appendix 5.3.</p>	<p>Vol 1 Section 5.1 Vol 1 Appendix 5.3 Vol 3</p>