

North London Waste Authority  
**North London Heat and Power  
Project**  
Phase One Consultation  
Feedback Report

The Planning Act 2008 Section 37 (3) (c) and Section 37 (7)

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.

**ARUP**

**nlwa**  
north london waste authority



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# 1 Introduction

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## 1.1 Overview

- 1.1.1 North London Waste Authority (the Applicant) is applying to the Secretary of State for Energy and Climate Change (SoS) for a Development Consent Order (DCO) made pursuant to the Planning Act 2008 (as amended).
- 1.1.2 The Application is for the North London Heat and Power Project (the Project) comprising the construction, operation and maintenance of an Energy Recovery Facility (ERF) of around 70 megawatts (MW<sub>e</sub>) at the Edmonton EcoPark in north London with associated development, including a Resource Recovery Facility (RRF). The proposed ERF will replace the existing Energy from Waste (EfW) facility at the Edmonton EcoPark.
- 1.1.3 Section 55(3)(e) of the Planning Act 2008 (as amended) provides that the Secretary of State (SoS) may accept an application for a DCO only where it is concluded that the applicant has complied with Chapter 2 of Part 5 of the Planning Act 2008 (as amended) relating to pre-application consultation.
- 1.1.4 The Applicant is therefore undertaking consultation in accordance with the requirements. The overriding aim of the pre-application public consultation on the proposed development is to ensure that the community and other interested parties have a chance to understand and influence the proposals.
- 1.1.5 The pre-application process comprises the following main stages:
- **Phase One Consultation**, which ran from 28 November 2014 to 27 January 2015, for a period of 61 days. Consultees prescribed by Section 42 and Section 47 of the Planning Act 2008 (as amended) were consulted.
  - **Phase Two Consultation**, which is running from 18 May 2015 to 30 June 2015, for a period of 44 days. Consultees prescribed by Section 42 consultees and Section 47 of the Planning Act 2008 (as amended) are being consulted.
  - **Publicity** undertaken in accordance with Section 48 of the Planning Act 2008 (as amended) which is running from 18 May 2015 to 30 June 2015 for a period of 44 days.
- 1.1.6 This Phase One Consultation Report sets out the process that has been undertaken for the first phase of consultation, it details the feedback received and explains how the feedback received has influenced the Project.

## 1.2 Requirement for Consultation

- 1.2.1 Pre-application consultation is an important part of the DCO process. Section 55(3)(e) of the Planning Act 2008 (as amended) sets out that the

Secretary of State (SoS) may only accept an application for a DCO if the applicant has complied with Chapter 2 of Part 5 of the Planning Act 2008 (as amended) relating to undertaking pre-application consultation.

#### 1.2.2 These requirements are summarised below:

- Sections 42-45 require the Applicant to consult with such persons as may be prescribed, the Greater London Authority, local authorities in whose area development is proposed and adjoining local authorities, owners, lessees, tenants and occupiers of the land, persons who are interested in the land or have the power to sell/convey or release the land, and persons who the promoter thinks would or might be entitled to make a claim under Section 10 of the Compulsory Purchase Act 1965, Part 1 of the Land Compensation Act 1973, or Section 152(3) of the Planning Act 2008 as a result of the DCO being implemented. At least 28 days must be allowed for this consultation;
- Section 46 requires the Applicant to provide all consultation material to the SoS on or before commencing consultation under Section 42;
- Section 47 makes a duty on the Applicant to consult the local community including the following requirements: to prepare a Statement of Community Consultation (SoCC) on how the consultation with those living in the vicinity of the land will be undertaken; to consult local authorities in whose area the development is proposed for a minimum of 28 days about what is to be in the SoCC; to have regard to the responses on the draft SoCC from the local authorities; to publish notice of the SoCC in a newspaper circulating in the vicinity of the land, such notice to also state where and when the SoCC can be inspected; and then to carry out the consultation in accordance with the SoCC;
- Section 48 requires the Applicant to publicise widely the proposed application and set a deadline for receipt of responses to the publicity (this deadline is prescribed by Regulation 4(3) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) and is currently a minimum of 28 days from when the notice under section 48 is last published); and
- Section 49 requires the Applicant to take account of relevant responses<sup>1</sup> to the above consultation and publicity before making a DCO application.

#### 1.2.3 Section 37(3)(c) requires a consultation report to accompany the DCO application providing details of what has been done in compliance with statutory consultation requirements, along with details of any response to the statutory consultation that was received by the relevant deadline and

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<sup>1</sup> Section 48(3) of the Planning Act 2008 states that a 'relevant response' means— (a) a response from a person consulted under section 42 that is received by the applicant before the deadline imposed by section 45 in that person's case, (b) a response to consultation under section 47(7) that is received by the applicant before any applicable deadline imposed in accordance with the statement prepared under section 47, or (c) a response to publicity under section 48 that is received by the applicant before the deadline imposed in accordance with section 48(2) in relation to that publicity.

details of the account taken by the promoter of any such response.  
Statement of Community Consultation

### **Statement of Community Consultation**

- 1.2.4 Prior to Phase One Consultation a SoCC was produced. This document sets out the chosen approach to public consultation; primarily describing the nature of statutory consultation at Phase One and Phase Two, outlining when, how, where and with whom consultation would be undertaken.
- 1.2.5 The overriding aim of the pre application public consultation on the proposed development was to ensure that the local community and other interested parties have a chance to understand and influence the proposals. The SoCC was developed with this vision in mind.
- 1.2.6 In developing the approach to consultation, regular meetings were held with LB Enfield, and a draft of the SoCC was issued to LB Enfield for formal consultation in accordance with statutory requirements. Once finalised, the SoCC was published in the public notices section of the Enfield Independent on 26 November 2014, as required by the Planning Act 2008 (as amended).
- 1.2.7 Phase One Consultation as reported here was completed in accordance with the SoCC.

### **EIA Regulations**

- 1.2.8 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (as amended) (EIA Regulations) also contain provisions that are relevant to consultation:
- Regulation 6 requires the applicant, before carrying out consultation under Section 42 of the Planning Act 2008 (as amended), to notify the SoS that it proposes to provide an Environmental Statement in respect of the proposed development;
  - Regulation 10 requires that the SoCC prepared under Section 47 of the Planning Act 2008 (as amended) sets out whether the proposed application relates to EIA development and how the applicant intends to publicise and consult on the preliminary environmental information; and
  - Regulation 11 requires that an applicant, at the same time as publishing notice of the proposed application under section 48 of the Planning Act (2008) (as amended), must send a copy of that notice to the “consultation bodies” and to any person notified to the applicant under Regulation 9(1)(c). The “consultation bodies” in this context are the prescribed consultees under the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 and the relevant local authorities pursuant to section 43 of the Planning Act 2008 (as amended).
- 1.2.9 The Applicant formally provided notification under Regulation 6(1)(b) of the EIA Regulations that it proposes to provide an Environmental

Statement in respect of the proposed development to the SoS on 10 October 2014.

- 1.2.10 In accordance with Regulation of the EIA Regulations the SoCC stated that the proposed application relates to EIA development and as such an Environmental Statement would be submitted with the application. The SoCC stated that preliminary environmental information would be made available during Phase 2 consultation.

### **1.3 Purpose of this Report**

- 1.3.1 This Report provides an overview of Phase One Consultation. It sets out the consultation process, details the feedback received and explains how this feedback has influenced the Project.
- 1.3.2 A full Consultation Report, outlining the consultation process taken throughout the pre-application period will be submitted with the application for development consent, in accordance with section 37(3) of the Planning Act 2008. The full Consultation Report will include the information contained in this Report, along with details of Phase Two Consultation.

## 2 Phase One Consultation

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### 2.1 Overview

- 2.1.1 A variety of methods were used during Phase One Consultation to ensure that local people and other stakeholders had the opportunity to hear about plans for the proposed ERF and input their ideas and feedback into proposals.
- 2.1.2 This section summarises the details of Phase One Consultation, including information on who was consulted, what was consulted on and how consultation was undertaken.

### 2.2 Duration of Consultation

- 2.2.1 Phase One Consultation ran from 28 November 2014 to 27 January 2015, a period of 61 days.

### 2.3 Who we consulted with

- 2.3.1 The following groups were consulted as part of Phase One Consultation:
- **Prescribed Consultees:** Section 42(1)(a) of the Planning Act 2008 (as amended) requires the applicant to consult with certain prescribed persons on their proposals. Prescribed consultees are listed in Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended). For NLHPP these included the Greater London Authority (GLA), the Environment Agency, Transport for London, and neighbouring London Boroughs;
  - **Local Authorities:** Section 42(1)(b) of the Planning Act 2008 (as amended) requires that local authorities that fall within Section 43 of the Planning Act 2008 are consulted. LB Enfield is the sole local authority within which the application site is located. LB Enfield was consulted formally during Phase One Consultation and on the SoCC prior to its publication; and informally throughout the development of the DCO. The following local authorities were also formally consulted at Section 43 consultees:
    - Greater London Authority;
    - LB Barnet;
    - LB Waltham Forest;
    - LB Haringey;
    - Essex County Council;
    - Hertfordshire County Council;
    - Epping Forest District Council;
    - Hertsmere Borough Council;
    - Broxbourne Borough Council; and
    - Welwyn Hatfield Borough Council.
  - **Landowners:** Section 42(1)(d) of the Planning Act 2008 (as amended) states that each person who falls within one or more of the categories set out in Section 44 of that Act must be consulted by the applicant.



Section 44 sets out three categories of persons who must all be consulted as part of a DCO application are:

- Category 1, an owner, lessee, tenant (whatever the tenancy period) or occupier of the land;
- Category 2, a person who (a) is interested in the land, or (b) has power to i) sell and convey the land or ii) to release the land; and
- Category 3, a person who, if the Development Consent Order (DCO) for the project were to be made and fully implemented, would or might be entitled a) as a result of implementing of the order, b) as a result of the order having been implemented or c) as a result of use of the land once the order has been implemented, to make a 'relevant claim'. A relevant claim is defined in section 44(6) as being: (i) a claim under Section 10 of the Compulsory Purchase Act 1965 for compensation where satisfaction is not made for the taking, or injurious affection, of land subject to compulsory purchase; (ii) a claim under Section 152(3) of the Planning Act 2008; or (iii) a claim under Part 1 of the Land Compensation Act 1973 for depreciation in value of land by physical factors caused by the use of the development.
- **Community Consultees:** Section 47 of the Planning Act 2008 (as amended) requires the applicant to consult people living in the vicinity of the project. A newsletter zone of at least 1,500m from the centre of the site was defined and used for Phase One Consultation. The newsletter zone includes 28,779 properties and 20 schools.

### Notifying the Secretary of State

2.3.2 A statutory notice was issued to the Planning Inspectorate on 19 November 2014 pursuant to Section 46 of the Planning Act 2008 to notify the Secretary of State (SoS) with information on the proposed application prior to commencing Phase One Consultation. This comprised a suite of background documents including the SoCC, consultation information, technical documents and suggested further reading.

2.3.3 The written Statutory Notice was accompanied by the following information (in soft copy):

- Background documents:
  - Statement of Community Consultation and Section 47(6) notice;
  - Likely form of letter to Section 42 consultees;
- Information documents:
  - Consultation Booklet;
  - Newsletter;
  - Advertisements;
  - Leaflets;
  - Business Cards;
- Technical documents:
  - Project Description;
  - Construction;

- EIA Process;
- Planning Policy;
- Transport;
- LondonWaste Limited;
- Tell me more about landfill;
- Options;
- Cooling System;
- Waste Modelling;
- Water Transport;
- Health and Emissions;
- What is EfW;
- The Waste Challenge;
- Further reading:
  - North London Joint Waste Strategy;
  - Waste Prevention Plan 2014-16;
  - Eunomia Waste Data Report and Waste Forecast Model;
  - Outline Business Case;
  - Ramboll report: A Review of Thermal Treatment Options;
  - Ramboll report: Design of Plant, Number of Plant Lines;
  - Site Boundary Plan;
  - Project Glossary;
  - Amec Factual Geotechnical Ground Investigation Report;
  - EIA Scoping Report;
  - Ramboll report: Health Impact Literature Review;
  - Ramboll report: Flue Gas Treatment Technology Options;
  - Ramboll report: Cooling Plant Technology Options;
  - List of Consultees; and
  - Vicinity Plan.

## **2.4 What we consulted on**

2.4.1 Phase One Consultation gave consultees an early opportunity to comment on the initial proposals for the Project. High level information on the emerging proposals was provided including site constraints, which have informed the proposal, size and shape of the ERF, initial approach to the design of the ERF building and stack, proposed site layout, proposed approach to landscaping and approach to assessing the potential environmental effects.

2.4.2 During Phase One Consultation comments were sought on:

- The need for the proposed development;
- Initial ideas on the appearance of the ERF and wider proposals, including the possible design of the stack and landscaping;
- Potential environmental considerations including the approach to emissions control and health impacts;
- The approach to traffic management;
- The approach to demolition and construction;
- The proposed visitor centre;

- The proposed approach to community benefits;
- The consultation process; and
- The choice of cooling system for the ERF.

## 2.5 How we consulted

2.5.1 In compliance with the consultation approach set out in the SoCC, a variety of consultation methods were used as part of the Phase One Consultation as summarised below.

### Adverts

2.5.2 A variety of media were used to publicise Phase One Consultation. The SoCC was published in the Enfield Independent, in accordance with Section 47(6) of the Planning Act 2008 (as amended). It was also made available at exhibitions and on the Project website.

2.5.3 For Phase One Consultation, a total of 35 advertisements were placed in 19 different local newspapers regarding specific exhibition dates. The full list of the local media publicity is outlined in Table 1.

Table 1: Phase One Publicity

Publicity	Date
Barnet and Potters Bar Times	27 November 2014 and 8 January 2015
Barnet First (council paper)	1 December 2014 (article, rather than advertisement)
Hendon and Finchley Times	27 November and 8 January 2015
Edgware and Mill Hill Times	28 November and 9 January 2015
Camden New Journal	27 November 2014 and 8 January 2015
Camden Magazine (council paper)	10 December 2014
Ham and High	27 November 2014
Enfield Independent	26 November 2014, 3 December 2014 and 8 January 2015
Our Enfield (council paper)	24 November 2014
Hackney Today (council paper)	1 December 2014 and 12 January 2015
Hackney Gazette	27 November 2014 and 8 January 2015
Haringey People (council paper)	8 December 2014
Haringey Independent	21 November 2014, 28 November 2014 and 9 January 2015
Islington Gazette	27 November 2014 and 8 January 2015
Islington Life (council magazine)	3-8 December 2014
Waltham Forest News (council magazine)	1 December 2014 and 12 January 2015
Waltham Forest Independent	20 November 2014, 27 November 2014 and 8 January 2015
Londra Gazete	27 November and 8 January

Parikiaki	27 November and 8 January
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2.5.4 A further 24 advertisements were placed in the online versions of some of these newspapers. Advertisements were also placed in the online versions of the following newspapers:

Table 2: Phase One Advertisements

Publication	Date
Enfield Independent online - skins & billboards i.e. banners at top and sides of homepage	24 November, 27 November and 1 December 2014 and 5 January, 8 January and 12 January 2015
Enfield Independent online – MPUs i.e. boxes that appear on all webpages	27 November 2014 and 5 January 2015
Haringey Independent online – skins & billboards i.e. banners at top and sides of homepage	24 November, 27 November and 1 December 2014 and 5 January, 8 January and 12 January 2015
Haringey Independent online – MPUs i.e. boxes that appear on all webpages	27 November 2014 and 5 January 2015
Waltham Forest Guardian online – skins & billboards i.e. banners at top and sides of homepage	24 November, 27 November and 1 December 2014 and 5 January, 8 January and 12 January 2015
Waltham Forest Guardian online – MPUs i.e. boxes that appear on all webpages	27 November 2014 and 5 January 2015

2.5.5 Social media activity included Facebook advertising. Customised Facebook adverts promoting the Project were developed to target the local community in Edmonton, Enfield, Haringey, Hackney, Barnet, Walthamstow, Tottenham, Camden and Islington. An additional set of Facebook adverts promoting the consultation exhibitions was also customised so they would be targeted at those in Edmonton, Enfield, Haringey, Hackney, Barnet, Walthamstow, Tottenham, Camden and Islington. Tweets were also issued to followers during the consultation period.

### Letters and Newsletters - Phase One Consultation

2.5.6 Arrangements were put in place to hand deliver Issue 1 of the NLHPP Community Newsletter to 28,779 properties located within the newsletter zone between 20 November 2014 and 27 November 2014. Following two reports the Newsletter had not been received by all properties, an investigation was carried out. This revealed that the delivery company had omitted a number of properties within the newsletter zone. An updated leaflet was therefore hand delivered to all properties in the whole newsletter zone on December 15 and December 16. A GPS tracking interface was used for the second delivery, this allowed deliveries to be tracked in real time. Signals from the operative's mobile phones recorded the roads visited every minute, creating a trail to monitor coverage. All properties were covered during this additional delivery round.

2.5.7 All properties were also hand delivered a copy of Issue 2 of the NLHPP Community Newsletter between 6 and 7 January 2015.

- 2.5.8 Issue 1 and Issue 2 of the NLHPP Community Newsletter provided information on the Project and the exhibitions. The leaflets encouraged people to find out more information from the Project website or by visiting an exhibition. The closing date for responses was also set out.
- 2.5.9 The consultation was also advertised in all of the NLWA's seven constituent Borough papers which are delivered to all properties in each borough. Leaflets were distributed to around 100 local libraries and council offices during Phase One Consultation. Separate leaflets were produced for residents of Enfield and the other north London Boroughs. The information included in the leaflets was the same with one exception, in the Enfield version of the leaflet the headline read "New waste facility at Edmonton" whereas the version for the wider north London audience read "New waste facility for north London".
- 2.5.10 Additional community drop-off points were identified in Enfield to ensure maximum coverage of the area. These points included community centres, leisure and sports clubs, arts centres, and medical centres. The locations were chosen to ensure an even spread of points across Enfield and to cover a range of audiences.
- 2.5.11 All of the 20 schools within the newsletter zone were contacted as part of Phase One Consultation. . Additionally headteachers at four schools (St John and St James Church of England Primary School, Nightingale Academy, Roger Ascham Primary School and Whittingham Primary Academy) which are just outside the newsletter zone but close to the 1.5km radius line were also contacted. Headteachers at all 24 schools were sent a copy of the advert and invited to include this in their school newsletter or on their intranet to encourage parents and teachers to attend the exhibitions and offer feedback on the proposals. All schools were made aware of the closing date for consultation.
- 2.5.12 Information was included in Enfield Voluntary Action's Newsletter which was e-mailed to approximately 750 local groups, and an email was sent out by Enfield Council's Voluntary and Community Sector team to 600 organisations.
- 2.5.13 Section 42 letters were also sent to 120 statutory consultees and 89 landowners. All the consultation information was provided to Section 42 consultees on a Project memory stick.

### **Consultation Website**

- 2.5.14 A dedicated website for the Project was launched on 20 November 2014, in advance of the start of Phase One Consultation ([www.northlondonheatandpower.london](http://www.northlondonheatandpower.london)). This website remains live and will continue to do so for the duration of the pre-application process.
- 2.5.15 The website sought to meet best practice standards in terms of accessibility and usability. The website was accessible on a range of devices such as desktop computers, tablets and smartphones. Page navigation was simple and clearly marked. White was used as the background colour wherever possible. Website text was in dark colours

and a font size which meets RNIB guidelines. The embedded video on the website was subtitled.

2.5.16 During Phase One Consultation the website provided electronic versions of all the information published, as well as a short video providing a brief introduction to the NLHPP and a link to the online version of the feedback forms. A PDF version was also available to be downloaded and posted to the NLHPP's FREEPOST address.

2.5.17 A frequently asked questions section was included on the website.

### Telephone Line

2.5.18 A dedicated telephone line (020 8489 3940) was made available for queries about the Project throughout Phase One Consultation. It was not possible to submit responses to the consultation through this phone line. This was to avoid the risk of verbal responses being subject to misunderstanding or interpretation. Respondents were directed to the website to submit a response, or where requested sent a hard copy of the feedback form.

### Community Briefings

2.5.19 To promote the exhibitions and the consultation, three local community briefings were held with local community representatives alongside the public exhibitions.

2.5.20 The aim of these briefings was to ensure that local community representatives, both formal and informal, understood the proposals and had a suitable level of accurate information on the Project to enable them to pass on factual information to interested members of the local community. The briefings were also aimed at explaining the Project to local community representatives at an early stage, in recognition that they may receive a number of enquiries about the Project from local residents. The briefings held are listed in Table 3.

2.5.21 NLWA also met with local councillors and local community group leaders to facilitate local understanding of the proposals and to encourage responses to the consultation. The following briefings were undertaken:

Table 3: Phase One Community Briefings

Briefing to	Date	Notes
Local Enfield Members (with wards in the vicinity)	3 November 2014	Request for presentation at Area Forum. This took place on 20 January 2015
Local Waltham Forest Members (with wards in the vicinity)	8 December 2014	Request for consultation booklets to be sent to Endlebury Area Forum meeting on 19 January 2015
Jubilee Ward Area Forum, Enfield	20 January 2015	

## Written Information

2.5.22 During Phase One consultation written information of a technical and non-technical nature about the Project was made available on the website and at public exhibitions. During Phase One Consultation the Applicant did not receive any requests for information.

2.5.23 The written information provided details on the following:

- An introduction to the NLHPP;
- Overview of the role of the North London Waste Authority;
- The planning policy context for the Project;
- Waste modelling;
- The waste challenge facing London today;
- The EIA process;
- Information about construction and traffic;
- Emissions and their potential impact on human health; and
- Information about the consultation and DCO process.

2.5.24 Hard copies of the feedback form were made available at the exhibitions. These asked the same questions as the online feedback form. To accompany the feedback forms, a consultation booklet was created which outlined key elements of information about the Project. The consultation booklet was designed to be read alongside the feedback form.

## Public Exhibitions

2.5.25 During Phase One Consultation a programme of public exhibitions was held in the vicinity of the EcoPark to give consultees, primarily local community members, the opportunity to find out more about the Project and to give their responses to feedback.

2.5.26 A total of 7 exhibitions were held at three separate location around LB Enfield. Details of the Phase One Consultation exhibitions were published as part of the SoCC, as well as being advertised in the newsletters and adverts described above. Attendees were encouraged to ask questions of the project team (who attended in person) and to submit written feedback by way of questionnaire.

2.5.27 Details of the exhibition locations and opening hours are set out in Table 4.

Table 4: Phase One Public Exhibitions

<p><i>Lee Valley Athletics Centre, 61 Meridian Way, London, N9 0AR</i> Friday, 5 December 2014, 3pm – 8pm Saturday, 6 December 2014, 11am – 5pm Wednesday, 14 January 2015, 3pm – 8pm</p> <p><i>Green Towers Community Centre, Edmonton Green Shopping Centre, London, N9 0BU</i> Monday, 8 December 2014, 10am – 8pm Thursday, 15 January 2015, 10am – 8pm Saturday, 17 January 2015, 11am – 5pm</p> <p><i>Boundary Community Hall, Snells Park Estate, Edmonton, N18 2SY</i> Thursday 22 January 2015, 4.30 pm – 8.30pm<sup>2</sup></p>
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- 2.5.28 The exhibitions displayed information to inform visitors about the Project. The same information was displayed as that made available on the Project website. Individual written queries and phone calls were responded to throughout Phase One consultation. No written queries were received.



Figure 1: Phase One Consultation Exhibition at Lee Valley Athletics Centre

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<sup>2</sup> Due to unforeseen circumstances this exhibition closed at approximately 6.30pm.



## 3 Feedback and Responses

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### 3.1 Approach to analysis

3.1.1 A total of 72 responses were received as part of Phase One Consultation. This excludes the nine null responses. Responses were received either as online response forms (via the website) or offline responses (paper response forms, letters and emails).

3.1.2 All responses were assigned a unique reference number and categorised with their response type on receipt. In order to analyse the responses, and the variety of views expressed, a coding framework was created to organise responses by key themes and issues so that key messages as well as specific points of detail could be captured and reported.

3.1.3 Themes covered as part of the coding framework were:

- Need;
- Landscape, design and appearance;
- Environment;
- Cooling system;
- Traffic and transport;
- Community benefits;
- Consultation; and
- Other.

3.1.4 Feedback was also sought on the visitor centre and the approach to construction and demolition. These do not have separate sections for analysis within the coding framework as they have been assimilated into other themes. Construction and demolition spans a number of the themes, whilst the visitor centre is considered within community benefits.

#### **Responses via the website**

3.1.5 Online submissions were securely downloaded from the consultation website on a regular basis throughout the consultation period.

3.1.6 While the consultation was open, users were able to update or amend their submissions. Amended submissions were reviewed and coding revised as required.

#### **Paper response forms and letters received via the freepost address**

3.1.7 A freepost address operated for the duration of Phase One consultation for respondents to submit their response in hard copy. Upon receipt, letters and paper-based response forms were logged and given a unique reference number. These were then scanned in order to be imported into the data analysis system.

## Anonymous submissions

- 3.1.8 Some respondents chose not to provide a name with their submission. These anonymous submissions were processed in the same way as other responses and have been included in the analysis that informs this report.

## 3.2 Overview of feedback received

- 3.2.1 Table 5 sets out the number of respondents by respondent type. The Project website attracted more than 3,000 visitors during the Phase One Consultation period.

Table 5: Number of respondents

Section of Planning Act 2008	Consultee type	Number of respondents	Name of Respondents
42	Statutory consultees	10	Greater London Authority; Health and Safety Executive; Highways Agency; National Grid; Natural England; Natural Resources Wales; Northumbrian Water; Thames Water; The Coal Authority and Trinity House
43	Local authorities	3	Hertsmere Borough Council; London Borough of Enfield and Westminster City Council
44	Landowners	2	Lee Valley Regional Park Authority and London Waste Limited;
47	Community consultees	57	NA

## 3.3 Responding to Feedback

- 3.3.1 The Planning Act 2008 (as amended) imposes a duty on the Applicant when formulating an application to the Planning Inspectorate, to 'have regard to any relevant responses' (Section 49(2)) received to consultation or publicity under Sections 42, 47 or 48 of the Planning Act 2008 within the specified deadlines.
- 3.3.2 Responses received from Phase One Consultation were carefully considered and will be taken into account in developing the proposals. Following identification and coding of the comments, NLWA reviewed how the feedback received might influence the development of the proposals. This involved a multi-disciplinary review of feedback including having regard to engineering, planning, environment, property and community considerations.
- 3.3.3 The following tables set out the comments by topic and the response to them. Table 6 sets out the abbreviations used in the following tables. In places below, it is stated that an assessment will be carried out and will be summarised in the Preliminary Environmental Information Report (PEIR). The PEIR will be made available during Phase Two Consultation.

3.3.4 Late responses are marked with an asterisk. Late responses were defined as any feedback received after the publicised close of the Phase One consultation phase. For Phase One Consultation this was any feedback received after 5pm on 27 January 2015. For Phase One Consultation late feedback was taken into consideration in the response analysis and is reported as part of the wider findings of this Report. For Phase Two Consultation all responses should be received prior to the closing date.

Table 6: Abbreviations

SC: Statutory Consultee	GLA: Greater London Authority
LA: Local Authority	HBC: Hertsmere Borough Council
LO: Landowner	HSE: Health and Safety Executive
CC: Community Consultee	LBE: London Borough of Enfield
	LVRPA: Lee Valley Regional Park Authority
	LWL: London Waste Limited
	TWUL: Thames Water Utilities Ltd
	WCC: Westminster City Council

### 3.4 Environment

3.4.1 The main comments raised in respect of environment issues during Phase One Consultation are set out in Table 7 below.

Table 7: Comments on the environment received at Phase One Consultation

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
3.4.2	General concern regarding impact on air quality and concern about efficacy of monitoring measures.		LBE	LVRPA*	11	9, 22, 24, 27, 29, 41, 43, 45, 50, 10028, 10031*	<p>The Applicant proposes to use emissions cleaning technology that would mean emissions would be reduced to well below the current regulatory requirement.</p> <p>The impact of the proposed development on air quality will be considered within the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the Development Consent Order (DCO) application. During Phase Two the emerging findings of this assessment will be available in the <i>Preliminary Environmental Information Report (PEIR)</i>.</p> <p>Stakeholders such as the Environment Agency and local authorities have been consulted on the scope of the environmental impact assessment (EIA) to ensure that it is appropriate.</p> <p>Air quality monitoring is carried out by the surrounding local authorities at a number of locations around the local area to monitor air quality concentrations at relevant receptor locations. Modelling will be carried out which allows concentrations of gases such as NO<sub>x</sub> to be predicted over a wider area than monitoring. This ensures any high concentrations of pollutants are included in ambient monitoring. Air quality modelling measures will be set out in the environmental impact assessment.</p>

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
3.4.3	Concern regarding CO <sub>2</sub> and NO <sub>x</sub> including the following comments; <ul style="list-style-type: none"> <li>• will be high;</li> <li>• should be minimised;</li> <li>• comply with London Plan carbon targets;</li> <li>• the NO<sub>x</sub> scrubber would not be efficient in removing the NO<sub>x</sub> gas.</li> </ul>	GLA	LBE		3	38, 42, 10028	The ERF must comply with stringent emission standards set by the Environment Agency. The ERF would have even better emission control technology than the existing plant does now. The proposed ERF would use the best currently available technology to clean flue gas and reduce NO <sub>x</sub> emissions. The scheme would include Selective Catalytic Reduction which is the most effective available treatment available for NO <sub>x</sub> .
3.4.4	Concern regarding particulates in particular the impact on those with chronic obstructive pulmonary disease (COPD).				1	27	The impact of the proposed development on air quality will be considered within the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the DCO application. During Phase Two the emerging findings of this assessment will be available in the <i>PEIR</i> . The environmental impact assessment will include consideration of fine particulate matter. <i>A Health Impact Assessment</i> is also being undertaken for the scheme and will form part of the DCO application.
3.4.5	Concern regarding accident-related air pollution. Questioned what bulk elements will be stored on site.				2	6, 10018	No dangerous volatile materials are expected to be stored in large quantities on-site.
3.4.6	Concern regarding cumulative impact when combined with North Circular Road pollution.				1	24	The proposed ERF is a replacement of an existing facility. The air quality assessment will set out the effects of the Project on the existing air quality conditions of the site and surrounding area (taking into consideration impacts that the North Circular has on the air quality). The impact of the proposed development on air quality will be considered within the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the DCO application.

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
							During Phase Two the emerging findings of this assessment will be available in the <i>PEIR</i> .
3.4.7	Concern regarding emissions during demolition including release of contaminants and release of dust containing asbestos/heavy metals during demolition.		LBE		1	25	The impact of the proposed development on air quality will be considered within the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the DCO application. During Phase Two the emerging findings of this assessment will be available in the <i>PEIR</i> . This will include details of the demolition and construction works and appropriate mitigation measures will be included in the <i>Code of Construction Practice</i> which will be available during Phase Two Consultation.
3.4.8	Concern regarding emissions during start-up and shut-down period.				1	6	The impact of the proposed development on air quality will be considered within the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the DCO application. During Phase Two the emerging findings of this assessment will be available in the <i>PEIR</i> . Worst case emissions will be assessed to ensure all impacts are considered, including those during start up and shut down.
3.4.9	Concern regarding emissions/dust from transport vehicles including the cumulative with existing pollution.				5	17, 24, 45, 46, 10006	The impact of the proposed development on air quality will be considered within the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the DCO application. During Phase Two the emerging findings of this assessment will be available in the <i>PEIR</i> .  An assessment of traffic generated from the development, including vehicle exhaust emissions and dust emissions from transport will be included. Appropriate measures to control emissions/dust during construction will be included in the <i>Code of Construction</i>

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
							<i>Practice</i> which will be available during Phase Two Consultation.
3.4.10	Request to prioritise low emissions and aim for zero pollution.				7	21, 25, 36, 37, 41, 44, 10018	The impact of the proposed development on air quality will be considered within the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the DCO application. During Phase Two the emerging findings of this assessment will be available in the <i>PEIR</i> being undertaken for the scheme. Best available measures to reduce emissions to air will be included in the scheme design, for example, within the <i>Code of Construction Practice</i> which will be available during Phase Two Consultation.
3.4.11	No air quality concerns. Comments that it would have minimal impact and will reduce emissions compared to existing site.		WCC		4	17, 39, 50, 10006	Noted
3.4.12	Suggest mitigation measures including low-emission vehicles and carbon capture technology.				3	21, 24, 38	The majority of vehicles visiting the EcoPark are those owned and operated by the north London boroughs and as such it are outside the control of the applicant. A small number of vehicles are owned and operated by LondonWaste Limited (who operate the site on behalf of NLWA) and the future requirements for these vehicles would be kept under review.  A initial review of carbon capture and storage technologies has found that such technology remains unproven for this type of operation and is current not financially viable.
3.4.13	Concerns about the visual impact of the scheme including: <ul style="list-style-type: none"> <li>• facility will have high visibility;</li> <li>• impact on Green Belt;</li> </ul>		LBE	LVRPA*	1	9	The environmental impact assessment for the scheme will include a visual impact assessment that uses agreed representative viewpoints from sensitive receptors to assess the effects of the proposed development. These sensitive receptors will include both residential and

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
	<ul style="list-style-type: none"> <li>• impact on LVRP and Navigation Corridor;</li> <li>• landscaping proposals not sufficient.</li> </ul>						recreational receptors including the LVRP and Navigation Corridor and will be agreed with stakeholders. The proposed development is being designed to take account of visual impact and landscaping.
3.4.14	Removal of the Camden Aggregates site will increase visual impact of proposed ERF.		LBE		1	26	The Camden Aggregates site is not within the control of the applicant. The environmental impact assessment for the scheme will include a visual assessment that uses representative viewpoints from sensitive receptors to assess the effects of the proposed development. These viewpoints will take into account the potential removal of the material storage mounds currently located on the Camden Aggregates site.
3.4.15	<p>Concern about impact on ecology/wildlife including:</p> <ul style="list-style-type: none"> <li>• loss of vegetation and habitat in north/east of site;</li> <li>• impact on Salmons Brook, Lee Navigation Corridor, SSSI, Tottenham Marshes, Lee Park Way;</li> <li>• impact on habitat connectivity;</li> <li>• impact of construction on natural habitats;</li> <li>• not covered sufficiently in EIA.</li> </ul>		LBE	LVRPA*	2	12, 50	<p>The impact of the proposed development on ecology will be considered within the environmental impact assessment.</p> <p>A Habitats Regulation Assessment screening (HRA) is also being undertaken and will be available during Phase Two Consultation. The HRA screening will identify any potential significant effects on European designated sites. Appropriate ecological measures will be included in the scheme design, including the <i>Code of Construction Practice</i>.</p>
3.4.16	Concern regarding impact of light pollution on ecology/wildlife.		LBE	LVRPA*	0		The impact of the proposed development on ecology will be considered within the environmental impact assessment. This will include consideration of light pollution on ecology/wildlife. During Phase Two the emerging findings of this assessment will be available in the <i>PEIR</i> .



Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
							The <i>Code of Construction Practice</i> for the scheme will include measures regarding lighting during construction.
3.4.17	<p>Suggested mitigation measures including:</p> <ul style="list-style-type: none"> <li>• increase viable habitat on/around the site and include in landscaping strategy;</li> <li>• set back main massing from eastern edge;</li> <li>• dark corridor along Lee Park Way/Navigation;</li> <li>• provision of Living Walls.</li> </ul>		LBE	LVRPA*	1	10010	Appropriate ecological measures will be included in the scheme design, including the <i>Code of Construction Practice</i> . These measures will be summarised in the ecology section of the <i>Environmental Statement</i> .
3.4.18	Concerns regarding noise pollution including traffic noise, lorry alarms, long operating hours and noise from air cooled condenser.				5	6, 25, 46, 54, 10006	The impact of the proposed development on noise will be considered within the environmental impact assessment. This will include an assessment of construction and operational road traffic noise. Target noise criteria for operational plant will be specified in the <i>Environmental Statement</i> . The <i>Code of Construction Practice</i> for the scheme will include measures regarding the management of noise during construction.
3.4.19	Request to keep construction noise as low as possible to reduce impact on residents.				4	16, 22, 24, 45	The impact of the proposed development on noise will be considered within the environmental impact assessment. The <i>Code of Construction Practice</i> for the scheme will include measures regarding the management of noise during construction.
3.4.20	<p>Concerns regarding water pollution and flood risk including:</p> <ul style="list-style-type: none"> <li>• potential contamination of water courses/ reservoir/ ecosystem;</li> <li>• pollution from water-borne freight;</li> </ul>	GLA TWUL*	LBE		3	6, 27, 39	The impact of the proposed development on water resources will be considered within the environmental impact assessment. A Flood Risk Assessment is also being undertaken for the scheme which will be appended to the <i>Environmental Statement</i> .

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
	<ul style="list-style-type: none"> <li>• surface water drainage issues;</li> <li>• flood risk.</li> </ul>						The <i>Code of Construction Practice</i> for the scheme will include measures to protect surface and ground water during construction.
3.4.21	<p>Suggested mitigation measures including:</p> <ul style="list-style-type: none"> <li>• comply with London Plan surface water drainage hierarchy;</li> <li>• rainwater harvesting system;</li> <li>• liaise with EA;</li> <li>• apply for Trade Effluent Consent;</li> <li>• seek groundwater discharge permit;</li> <li>• take account of required pipe pressure;</li> <li>• fit petrol/oil interceptors on facilities;</li> <li>• fat trap in catering areas;</li> <li>• waste oil collection and recycling into biodiesel.</li> </ul>	GLA TWUL*	LBE		0		<p>The impact of the proposed development on water resources will be considered within the environmental impact assessment, the approach for which has been agreed with the Environment Agency. The Environmental Statement will include the identification of appropriate mitigation measures if required. The <i>Code of Construction Practice</i> for the scheme will include measures to protect surface and ground water during construction.</p> <p>All necessary consents required for the operation of new facilities, such as Trade Effluent Consent and groundwater discharge consent where required would be secured in advance.</p> <p>It is not intended to accept waste oil on site except that received from householders at the Reuse and Recycling Centre which will be sent to an appropriate reprocessor.</p>
3.4.22	Protect public from dangers posed by electrical equipment and comply with regulations.	HSE			0		Safety on site would be assisted by the separation of public access areas from the operational zone. Public access to the site would be carefully managed. Electrical equipment would comply with all applicable regulations.
3.4.23	Check whether Hazardous Substances Consent is required and comply with regulations.	HSE			0		The operations would be required to comply with all relevant consents and regulations including those relating to the use, storage, and treatment/disposal of hazardous substance.
3.4.24	Comments regarding the health impact of emissions including concern regarding cancer				7	22, 24, 27, 29, 38, 10003, 10006	Current best available technology would be used to ensure emissions are reduced as far as practicably possible. A <i>Health Impact Assessment</i> is also being

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
	generally, respiratory cancer and asthma, impact on individual with COPD, request for evidence and stricter emission controls may be required.						undertaken for the scheme and a draft will be available during Phase Two Consultation.
3.4.25	Comply with all regulations and refer to HSE website.	HSE			0		The Project would comply with all applicable regulations.
3.4.26	Concern regarding odour including: <ul style="list-style-type: none"> <li>• odour comes from current site;</li> <li>• unsure where odour originates from;</li> <li>• odour will increase in new location for Russell Road resident;</li> <li>• conduct odour assessment.</li> </ul>		LBE		6	22, 23, 24, 25, 54, 10003	The impact of the proposed development on odour will be considered within the environmental impact assessment. Odour controls would be fitted to the site and some odorous processes on the existing site would be removed as part of the development. It is expected that there would be a considerable improvement in odour conditions at the site.
3.4.27	Odour will be minimised due to removal of composting facility.				1	10006	Noted.
3.4.28	Suggested mitigation measure to use filters to minimise odours.				1	23	Appropriate odour controls would be fitted to the plant to meet Environment Agency requirements.
3.4.29	Concern regarding impact on climate change and request that this is assessed. Comments include: <ul style="list-style-type: none"> <li>• minimise carbon emissions conform with Enfield's Spatial Vision and Strategic Objective 2;</li> <li>• not covered in documents so far;</li> <li>• conduct full analysis of implications of proposal and alternatives;</li> </ul>		LBE		3	21, 38, 10028	The applicant is carrying out assessments using the WRATE life-cycle software, an Environment Agency tool for assessing the environmental impact of proposed developments or facilities. The assessment will consider the impacts of the proposed ERF, which will include carbon impact assessments.  The proposal has sought to minimise carbon emissions through good design. The <i>Sustainability Statement</i> to be submitted as part of the DCO application will set out more details on this.

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
	<ul style="list-style-type: none"> <li>minimise embodied carbon during construction.</li> </ul>						The embodied carbon is assessed as part of the <i>BREEAM assessment</i> which will form part of the DCO application.
3.4.30	Query if the scheme will reduce climate change impact and meet Carbon Intensity Floor target	GLA					The <i>Sustainability Statement</i> which will form part of the DCO application will identify a carbon intensity target for ancillary buildings on site taking into account London Plan targets and future zero carbon building regulations.
3.4.31	Request to minimise environmental impact and statement that impact is being underplayed			LVRPA*	7	11, 16, 21, 22, 24, 28, 50	The environmental impact assessment will assess the environmental effects associated with the scheme development. This will identify if there are any likely significant environmental effects and mitigation will be identified where required. Effects will be minimised through environmental design input and measures contained within the <i>Code of Construction Practice</i> for the scheme.
3.4.32	Positive impact/ will minimise/reduce environmental impact. Comments include: <ul style="list-style-type: none"> <li>less fossil fuel reliance;</li> <li>provision of power to homes;</li> <li>modern technologies.</li> </ul>		WCC		7	8, 28, 37, 39, 43, 10002, 10006	
3.4.33	Other concerns including: <ul style="list-style-type: none"> <li>effluent from wet treatment of flue gases;</li> <li>leaks;</li> <li>litter from waste vehicles;</li> <li>fly tipping.</li> </ul>				5	6, 17, 22, 23, 25	The environmental impact assessment will assess the environmental effects associated with the scheme development. The site would be subject to on-going good site management.
3.4.34	Suggested mitigation measures including: <ul style="list-style-type: none"> <li>align with London Plan;</li> <li>robust CoCP;</li> <li>support green charities;</li> </ul>	GLA	LBE		3	36, 48, 10019	London Plan policies are being taken into consideration in the development of the design.  The environmental impact assessment will assess the environmental effects associated with the scheme development, identifying appropriate mitigation measures where required. Such measures will be incorporated into the proposed development design and

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
	<ul style="list-style-type: none"> <li>• recycle/re-use materials from old plant.</li> </ul>						<p>be contained within the <i>Code of Construction Practice</i> for the scheme.</p> <p>In line with good waste minimisation practice the demolition of the existing EfW facility would seek to recycle and reuse as many materials as possible.</p>
3.4.35	<p>Requests for further assessments including:</p> <ul style="list-style-type: none"> <li>• carbon assessments;</li> <li>• climate change analysis for proposal and alternatives;</li> <li>• noise studies including impact on sensitive receptors;</li> <li>• local health impact of emissions;</li> <li>• protected species survey;</li> <li>• air pollution assessments using WHO levels;</li> <li>• visual impact study;</li> <li>• flood risk assessment;</li> <li>• cumulative impact assessment;</li> <li>• assessment of effects of increased water demand, waste treatment and surface water.</li> </ul>	NE GLA TWUL*	LBE	LVRPA*	5	6, 29, 38, 10016, 10028	<p>The environmental impact assessment will assess the environmental effects associated with the scheme development including effects on air quality and odour (which will examine the impacts of the plant against UK and European Air Quality Standards that are largely based on WHO proposals), ecology, ground conditions and contamination, noise and vibration, socio-economics, visual impact, traffic and transport, water resources, environmental wind and daylight, sunlight and overshadowing. Appropriate receptors will be considered for each of the environmental topic assessments. A cumulative effects assessment will be undertaken for all environmental topics.</p> <p>Supplementary studies also include a flood risk assessment (taking climate change into account) and health risk assessment.</p> <p>Based on our assessment, we considered, that an ERF is the most suitable technology to manage North London's residual waste. It is not practical to undertake climate change analysis on all alternatives, however having determined the most suitable technology an analysis of potential climate change impacts is being undertaken and will be set out in the <i>Sustainability Statement</i> which will form part of the DCO application.</p>
3.4.36	No concerns/measures sufficient/ will provide more detailed comments after HRA/EIA.	NE GLA	WCC		16	5, 16, 18, 19, 25, 26, 37, 40, 41, 45, 47, 52,	Noted.

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
						10008, 10009, 10019, 10020	

### Account taken of Phase One environment comments

- 3.4.37 Phase One Consultation indicated that consultees would like more information about the potential environmental effects of the scheme and how these will be managed. This information is provided in the *Preliminary Environmental Information Report* (PEIR) which is published as part of Phase Two consultation. The *Interim Code of Construction Practice* (CoCP), also published for Phase Two consultation, set out methods for managing potential effects during construction, including for example measures to protect surface and ground water during construction and measures to manage construction noise.
- 3.4.38 A number of respondents stated a preference for the visual impact of the scheme to be reduced. This has informed the scheme design which seeks to reduce the overall bulk and massing of the ERF and use landscaping to reduce visual impact.
- 3.4.39 Issues raised included the impact of the scheme on local ecology. In response appropriate ecological measures, such as green roofs, have been incorporated into the design.
- 3.4.40 A number of comments related to carbon emissions from the scheme and the need for analyse the impact. In response an assessment based on the WRATE methodology, an Environment Agency tool for assessing the environmental impact of proposed developments or facilities, has been undertaken. The assessment considers the impacts of the proposed ERF, which will include carbon impact assessments. This assessment will be submitted with the DCO application.

### 3.5 Need

3.5.1 The main comments raised in respect of the need for the scheme during Phase One Consultation are set out in Table 8 below.

Table 8: Comments on the need for the scheme received at Phase One Consultation

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
3.5.2	General support, no reasons stated.		WCC HBC	LWL	21	5, 8, 17, 18, 19, 21, 25, 26, 27, 31, 40, 41, 43, 44, 45, 46, 10006, 10008, 10009, 10018, 10020	Support for the scheme is noted and welcomed.
3.5.3	Support because the current facility is reaching the end of its life.			LWL	3	5, 6, 16	
3.5.4	Support because less waste will be sent to landfill.	GLA		LWL	0		
3.5.5	Support because the new technology would allow waste to be treated more efficiently.	GLA	WCC LBE	LWL LVRPA*	6	19, 25, 33, 37, 10006, 10008	
3.5.6	Support because the new technology is more environmentally-friendly.		WCC		8	8, 16, 18, 28, 37, 43, 54, 10006	
3.5.7	Support because the new technology is future-proof and will not become outdated soon.				1	16	

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response	
3.5.8	Support because it encourages recycling by increasing the recycling capacity.	GLA	HBC		3	35, 39, 10019		
3.5.9	Support if the financial gains are secured through competitive gate fees, economies of scale and reduced reliance on gas imports. Perceived as good value for the residents of North London.		WCC	LWL	1	8		
3.5.10	Support because it meets future demand. Population and waste volumes are growing.	GLA	WCC	LVRPA*	0			
3.5.11	Support because it makes use of existing site and workforce.	GLA		LWL	4	5, 9, 52, 10005		
3.5.12	Support promotes waste and net self-sufficiency.	GLA			0			
3.5.13	Support because more waste will be managed closer to source. This in turn would minimise travel.	GLA	WCC		2	47, 52		
3.5.14	Other reasons for support include serving as a flagship project, avoiding Pinkham Way, protecting current and providing future job opportunities and delivering integrated waste management service.		WCC		2	10005, 10006		
3.5.15	Support with the following caveats: <ul style="list-style-type: none"> <li>• should not disturb the local community and environment,</li> <li>• should not discourage recycling,</li> </ul>		LBE		8	9, 23, 25, 28, 36, 42, 47, 50		Support for the scheme is noted and welcomed. All of the caveats noted are supported by the NLWA and further responses are set out in the remainder of the table.



Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
	<ul style="list-style-type: none"> <li>• should be cost and energy efficient</li> <li>• should use future-proof technology</li> <li>• should demonstrate it provides sustainable and efficient solution that meets all policy requirements.</li> </ul>						More detailed information on the design of the ERF will be available during Phase Two Consultation.
3.5.16	Oppose because residents will not benefit.				3	24, 48, 53	<p>NLWA is proposing a cost effective waste disposal solution which would benefit all residents of north London for the cost of waste management paid for through the council tax.</p> <p>The replacement ERF would provide a solution to the whole of north London's waste left over after recycling. During Phase One Consultation the applicant sought views on what would help in the local area and a number of suggestions were made, such as landscaping and a visitors centre. These are described in more detail in the 'Community Benefits' table.</p>
3.5.17	Negative impact on recycling/re-use/prevention. Incineration should be a last resort.				9	9, 36, 38, 47, 53, 10016, 10021, 10025, 10031*	<p>The NLWA is committed to the waste hierarchy, in which incineration or its main alternative, landfill, come after other forms of waste management such as recycling and composting, and has active programmes to encourage waste prevention, re-use and recycling. The NLWA's 'Wise up to Waste' campaign has more details of this activity (See: <a href="http://www.wiseuptowaste.org.uk/">http://www.wiseuptowaste.org.uk/</a>).</p> <p>The need case is based on the central recycling scenario of 50%, which is considered to be an appropriate target for modelling purposes, and consistent with existing strategy. The forecasting methodology gives a lower estimate of residual waste arisings over the period than if we had used population growth (which is the basis of the GLA estimates).</p>

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
3.5.18	NLWA should have demonstrated why alternatives have been rejected. Focus should be on other more-environmentally friendly waste management methods.				2	38, 10016	Based on our assessment, we considered that an ERF is the most suitable technology to manage North London's residual waste, that is, waste remaining after waste reduction and recycling activity. Details of our assessment process will be set out in the <i>Alternatives Assessment Report</i> which will be available during Phase Two Consultation.
3.5.19	Overcapacity due to higher than assumed waste arisings and achieving higher than assumed recycling targets across household, commercial and industrial and other waste.				7	6, 38, 53, 54, 10016, 10021, 10025	<p>The waste forecasting is based on estimates of residual waste which will be collected by the north London boroughs over the years to 2051, allowing for a 50% recycling rate for household waste. The methodology is clearly set out in the <i>Need Case</i> document, which will be available at Phase Two Consultation, and based on a range of data and compiled by nationally recognised external advisers. In developing the forecasts various scenarios were considered.</p> <p>The forecasting methodology gives a lower estimate of residual waste arisings over the period than if we had used population growth (which is the basis of the GLA estimates).</p>
3.5.20	Overcapacity will lead to the ERF seeking to become provider of waste services to a wider area. Concerns that this is not viable and/or not in interest of the local community and would discourage other boroughs from seeking local solutions to waste management.				3	53, 10016, 10021	<p>Should the amount of residual waste collected by the NLWA boroughs be less than assumed in the ERF sizing then the ERF would have spare capacity. If this were to be the case then other waste could be taken in, to ensure that the ERF is managed efficiently, and could include waste from other public authorities as currently done at the existing facility.</p> <p>To fail to plan for a facility of sufficient size to deal with the estimates of residual waste collected by the NLWA boroughs in the future would not be in the interests of the local community due to the risk that this waste would have to be treated or diverted to landfill outside the</p>

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
							area in contravention of the Mayor's plan for net self-sufficiency in the treatment of London's waste by 2026.
3.5.21	<p>Flaws in waste forecasting approach including:</p> <ul style="list-style-type: none"> <li>• does not look into other forecasting scenarios</li> <li>• uses wrong / unreliable data.</li> </ul>				3	10016, 10021, 10024	<p>The waste forecasting is based on estimates of residual waste which will be collected by the north London boroughs over the years to 2051, allowing for a 50% recycling rate for household waste. The methodology is clearly set out in the need case document, which will be available at phase 2 consultation, and based on a range of data and compiled by nationally recognised external advisers. In considering the forecasts various scenarios were considered.</p> <p>No waste forecasting approach is without this uncertainty but for the scheme the forecasting has been based on comprehensive regression analysis to identify the social/economic indicator variables most closely correlated with historic household waste arisings using the most up-to-date publically-available data. A comparison with a number of alternative approaches to modelling future waste arisings including, for example, those based on waste per household using various household growth scenarios examined for the development of the updated London Plan shows that the scheme forecast is broadly consistent with these alternatives and generates a more conservative estimate of overall household waste arisings compared to the main London Plan projection which uses population growth as the basis.</p>
3.5.22	Waste arisings forecast inconsistent with the North London Waste Plan (NLWP).		LBE		1	10016	The North London Waste Plan is a separate process, and is a land use Plan, agreed by the seven boroughs in their capacity as local planning authorities. It is understood, through liaison with the NLWP process, in which the NLWA is a key stakeholder, that the NLWP data studies will take into account the forecasting
3.5.23	Lack of integration with other strategies and the partner				2	10016, 10021	

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
	authorities are inconsistent in their waste and recycling targets. The proposed approach could result in some waste processes being outsourced.						<p>carried out for this Project. The NLWP is due for consultation in the summer of 2015, and the EcoPark, as a protected waste management site, is expected to be listed in that plan. The scheme proposed is consistent with the Joint Waste Strategy of the NLWA and seven north London Boroughs. In developing these proposals, NLWA has been working with the seven boroughs as its partners.</p> <p>The scheme is being brought forward to replace the existing EfW facility and ensure continued sustainable treatment of north London's residual waste.</p> <p>The applicant has consulted with partner authorities, including the seven NLWA boroughs, on the use of recycling target assumptions in the modelling.</p> <p>Waste treatment operations which would be discontinued to make way for the new development would be sought from third party suppliers. These may be reinstated on site in the long term, subject to planning and permitting, but as yet no decisions have been made to do so.</p>
3.5.24	Concern regarding waste forecasting including insufficient/incomplete assessments and no financial, risk or carbon comparative analysis. Also it is not clear how the proposal has been formally assessed by the partner authorities.				2	10016, 10028	<p>A WRATE (an Environment Agency tool for environmental assessment) assessment which includes covers carbon comparative analysis is currently being undertaken.</p> <p>The preliminary costings for the replacement ERF show a cost of £450 million to £500 million. Further cost information will be available prior to the DCO application but will remain subject to detailed design after the Development Consent Order (DCO) application has been determined.</p> <p>Decisions are made by NLWA which is made up of 14 councillors, two from each of the seven constituent boroughs.</p>

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
							In developing this scheme, NLWA has been working with the seven boroughs as its partners.
3.5.25	Reduces availability of land and therefore does not conform with the Authorities' position to reduce land by co-locating facilities.				2	10016, 10021	The ERF would be located within the EcoPark on a part of the site currently used for other waste treatment facilities. The whole EcoPark site is designated for waste use. Once the ERF is commissioned and operational, other waste management uses would be considered for the area on which the existing plant now stands, which would then be vacant, taking account of waste management needs at that time but subject to separate planning process if pursued in future.
3.5.26	The ERF is too close to residents.		LBE		4	22, 24, 25, 10003	The ERF would be located at the EcoPark which is an existing waste site safeguarded for future waste use in the London Plan. Regional policies promote self-sufficiency of waste management within London, and therefore because of the density of development in London, waste management sites would not be set in open space. The nearest residential street is Badma Close, approximately 600m from the Edmonton EcoPark and 60m from the nearest part of the Application Site boundary. Residential receptors are also located on Zambezie Drive approximately 125m west of the Edmonton EcoPark, and on Lower Hall Lane approximately 550m east of the Edmonton EcoPark and 150m from the nearest part of the Application Site boundary. The likely significant effects at sensitive receptors, such as residential areas, will be considered as part of the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the DCO application.

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
3.5.27	Concerns about the environmental effect of the required feedstock.				2	10016, 10021	The ERF would be fed with residual waste collected by the NLWA authorities from household, C&I and other sources (e.g. fly-tipping, highways etc). Should there be spare capacity, then other waste could be taken in, to ensure that the ERF is managed efficiently, and could include waste from other public authorities as currently done at the existing facility. This waste would only be secured by offering competitive gate fees and would generate an income for the NLWA.
3.5.28	Concerns about impact on nearby developments.		LBE		1	52	<p>The site is a protected waste management site, and this will be clear to other developers in the area through the strategic/planning plans and policies for the area and site. Its use as a waste management site will be taken into account by other developers in assessing their own proposals. There will be the potential for nearby development wherever a waste site is located.</p> <p>The likely significant effects of the scheme on nearby developments is considered as part of the cumulative assessment in the environmental impact assessment will be reported in the <i>Environmental Statement</i> which forms part of the DCO application.</p>
3.5.29	Concerns about cost including: <ul style="list-style-type: none"> <li>• financial implication of overcapacity;</li> <li>• need for carbon capture facilities.</li> </ul>		LBE		3	38, 10016, 10021	<p>Should there be spare capacity, then other waste could be taken in, to ensure that the ERF is managed efficiently, and could include waste from other public authorities as currently done at the existing facility.</p> <p>An initial review of carbon capture and storage technologies has found that such technology remains unproven for this type of operation and are current not financially viable.</p>
3.5.30	Flexible approach that allows the ERF to expand as and if required.				2	10016, 10021	Based on our assessment the ERF is the optimum size taking into account the forecast waste arisings and NLWA's obligation to put in place arrangements to deal

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
							with residual waste collected in its area without being able to be certain about how much there would be. It is not anticipated that significant additional capacity would be required during the lifetime of the ERF, however should this be the case a new application would be required.
3.5.31	Suggest the following as alternatives: anaerobic digestion, pyrolysis and the Norfolk solution.				1	10031*	Based on our assessment, we considered, on balance that an ERF is the most suitable technology to manage North London's residual waste. Details of our assessment process are set out in the <i>Alternatives Assessment Report</i> which will be available during Phase Two Consultation.  Anaerobic digestion is one of the methods of treating organic waste. NLWA is already treating organic waste as part of its recycling activity. Pyrolysis is considered in the <i>Alternatives Assessment Report</i> .
3.5.32	Dual capability to be considered if there is less waste fuel in the future.				1	10019	We understand dual capability to mean the ability to process more than one type of fuel. It is not practical or economical to design facilities an ERF at this scale to have dual capability.  Based on our assessment, we considered, that an ERF is the most suitable technology to manage North London's residual waste. Details of our assessment process will be set out in the <i>Alternatives Assessment Report</i> which will be available during Phase Two Consultation.
3.5.33	General support including, support for low-carbon, inexpensive heat used locally, preference to spent money on this than on landscaping and request for confirmation that	GLA	WCC LBE		6	18, 42, 47, 53, 10019, 10031*	The scheme is designed to deliver both heat and electricity. The proposals also safeguard space for an energy centre on site (to be brought forward by the Lee Valley Heat Network (LVHN)) and for pipework to leave the site. The NLWA is working closely with the promoters of the LVHN to develop proposals for the

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
	heat would be supplied to the Lee Valley Heat Network.						heat from the ERF to be used as part of the heat network.
3.5.34	Timeline is reasonable.				1	43	Support for the timeline is noted and welcomed.
3.5.35	Questions about the duration of the construction stage such as when will the works begin and how long will they last.				1	24	Further detailed timescales including phasing will be provided at Phase Two Consultation.
3.5.36	Should be cost-efficient	GLA			4	21, 23, 28, 39	The NLWA's Outline Business Case (OBC) identified ERF/EFW as the most cost effective option for the treatment of North London's residual waste.
3.5.37	Should be modern/efficient		LBE		2	16, 45	The ERF would be built using today's most advanced technology. It would be one of the most effective of its kind by current standards.  We are seeking sufficient flexibility within the DCO application to be able to assess the detailed solution before procurement allowing potential upgrading at this point. Future flexibility would also be required to respond to potential future regulatory change.
3.5.38	Should be future proof/upgradable				3	9, 28, 42	
3.5.39	Request studies that ensure that no National Grid's apparatus would be affected.	National Grid			0		We are assessing all utilities which are required for the site or affected by the proposals as part of scheme development. As part of this we are liaising with UKPN who consult National Grid as part of the process.
3.5.40	Request strategic, financial and risk assessment of both the proposed ERF and any alternative scenarios.		LBE		2	10016, 10021	Based on our assessment, including cost of technologies available for management of waste at this scale, we considered, that an ERF is the most suitable technology to manage North London's residual waste. Details of our assessment process are set out in the <i>Alternatives Assessment Report</i> which will be available during Phase Two Consultation. Further financial and risk assessment will take place before any procurement is carried out.



Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
3.5.41	Request for the ERF to remain in public ownership.				1	10031*	The site is currently owned by LondonWaste Limited, a company owned by NLWA and therefore in public ownership. The site will continue to be in public ownership unless a change, for example to legislation, required otherwise.

### Account taken of Phase One need comments

- 3.5.42 A number of comments requested further information on and assessment of the alternatives considered. In response the *Alternatives Assessment Report* is published as part of Phase Two consultation. This report details the decisions leading to the selection of the proposed technology.
- 3.5.43 Some comments considered there to be flaws in waste forecasting approach. In response detailed information on the approach to waste forecasting, including the methodology used and data sources, is published in the *Need Case* which is available during Phase Two consultation.

## 3.6 Landscape, design and appearance

3.6.1 The main comments raised in respect of landscape, design and appearance during Phase One Consultation are set out in Table 9 below.

Table 9: Comments on landscape, design and appearance received at Phase One Consultation

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
<b>Landscape, design and appearance</b>							
<b>No concerns/proposals are acceptable</b>							
3.6.2	Satisfied with the proposed approach.				7	18, 26, 40, 42, 48, 50 10020	Noted
3.6.3	Supports the proposed positioning of the chimney stack.			LVRPA*	0		Noted
<b>Appearance</b>							
3.6.4	Should look better than the current facility.				4	19, 22, 24, 27	The ERF and other facilities on site would be new facilities of a high quality of design. Further information on the design of the proposed development will be available during Phase Two Consultation.
3.6.5	Should blend in with the surrounding environment.				6	9, 22, 24, 36, 44, 54	The proposed development is bring designed to respond to its surrounding context. The design seeks to minimise the visual impact of the building from the Lee Valley Regional Park. For the ERF this would be achieved by stepping back the massing of the building and through a site wide landscaping strategy which integrates the site into the wider landscape. Further information on the design of the ERF will be available during Phase Two Consultation.
3.6.6	Should be impressive and become a tourist attraction like similar facilities abroad.		WCC		2	5, 6	The ERF would be a new flagship facility of a high quality of design. Further information on the design of the ERF will be available during Phase Two Consultation.

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
							The proposed EcoPark House would include space to be used for education and community purposes, and site tours would continue to be offered, however it is not proposed for the ERF to become a tourist attraction because it is an operational waste management site with large numbers of waste vehicle movements.
3.6.7	Should be modern and pleasant to look at.			LVRPA*	5	41, 45, 54, 10006, 10010	The ERF would be a new flagship facility of a high quality of design.
3.6.8	Should be simple and in keep with its industrial use.				2	21, 25	The ERF would be a new flagship facility of a high quality of design. The ERF has been designed to respond to its surrounding context, including its industrial setting. Further information on the design of the ERF will be available during Phase Two Consultation.
3.6.9	Should employ a low-cost maintenance approach.				2	54, 10019	The maintenance of the ERF and other facilities on site has been considered throughout the design development.
3.6.10	Appearance specific suggestions including: <ul style="list-style-type: none"> <li>• use architectural detailing, height variation, fenestration, use of high quality finishing materials;</li> <li>• comply with CLAAP, Core Strategy and DMD;</li> <li>• two-stored reception building.</li> </ul>		LBE	LVRPA*	0		Specific suggestions regarding the detailed design of EcoPark House will be taken into consideration in developing our proposals. LB Enfield's policy including the CLAAP, Core Strategy and DMD have informed the design. EcoPark House is ground plus two storeys and would therefore offer views across Lee Valley Regional Park. Further information on the design of EcoPark House will be available during Phase Two Consultation.
<b>Chimney stack</b>							
3.6.11	Prefer an incorporated chimney stack.				4	19, 21, 41, 10008	As part of the design development of the stack a number of options have been considered and these were consulted on during Phase One Consultation with some respondents preferring an incorporated stack and others a separate stack.

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
							On balance it is proposed to have the stack separated from the bulk of the ERF but still part of the overall composition. Comments received during Phase One Consultation indicate that reducing visual impact is important. This arrangement would help to reduce the perceived scale and massing of the main processing hall thereby reducing visual impact.
3.6.12	Prefer an independent chimney stack because it is less obtrusive.				2	27, 39	The stack would be independent from the remainder of the ERF building, although remain part of the overall composition.
3.6.13	Prefer a chimney stack with two separate flues.				2	16, 27	Two separate flues are an operational requirement of the ERF. The design development has considered incorporating both flues into a single chimney stack and having two chimney stacks. These options were consulted on during Phase One Consultation with some respondents preferring two separate flues and other preferring the flues to be combined into one chimney. On balance it is considered that a single chimney stack which incorporates both flues is a less visually intrusive option.
3.6.14	Prefer a chimney stack with a single flue because it is less obtrusive.				8	19, 21, 39, 40, 41, 45, 10010, 10019	
3.6.15	Oppose a chimney stack altogether.				1	24	The chimney stack is an operational requirement of the ERF and as such it is not possible to eliminate it entirely from the design.
3.6.16	Preference that the stack is green/brown to blend in and that a waterfall mural is used to emphasise that the plume not smoke.				2	27, 47	The stack has been designed to be as unobtrusive as possible in line with comments raised during Phase One Consultation. As such it is considered that a sculpture and water mural are not suitable. The intention is that the stack would be of a high quality design and would remain a visual marker of the site for the surrounding area.
3.6.17	Suggest that the design is innovative, with a narrower		LBE		1	24	The size and profile of the stack is largely dictated by structural and operational requirements. The design intention is to minimise if possible the width in the views

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
	diameter, and that it is low and unobtrusive.						<p>from the East and West where the residential areas are predominantly located.</p> <p>The height of the stack is determined by the air quality modelling work which will be set out in the Environmental Statement which will form part of the Development Consent Order (DCO) application. The stack has been designed to be as unobtrusive as possible.</p> <p>The stack has been designed to be as unobtrusive as possible in line with comments raised during Phase One Consultation. The stack has been designed as a component part of the overall design of the ERF.</p>
<b>Landscaping</b>							
3.6.18	Landscaping is essential. Suggest that landscaping should comply with EcoPark Supplementary Planning Document, Suggest that landscaping should include Lee Navigation and area around A406.		LBE	LVRPA*	5	5, 16, 27, 41, 10006	<p>The proposals include landscaping to create a high quality environment that maximises ecological enhancement and sustainable water management. The landscaping design also seeks integrate the site into the wider landscape character to minimise visual impact.</p> <p>The proposals include habitat enhancement and creation including open woodland, tree planting and scrub planting along the site's eastern boundary, as well as marginal planting along Enfield Ditch. Landscaping would also be provided along on the eastern boundary of the Lee Navigation opposite the site. These improvements would enhance the setting of the development. Landscaping would also be provided on the eastern side of the Lee Navigation. In addition, a connection to the tow path from the bridge on Lee Park Way would be provided.</p> <p>Guidelines for the landscaping of the EcoPark are predominantly set out in the Edmonton EcoPark Planning Brief (LB Enfield, May 2013). The landscape design has been developed in accordance with the principles in this document. The key points are to create</p>

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
							a green edge along the eastern boundary and create high quality waterside areas, both of which have been incorporated in to the landscape strategy. Further details on landscaping will be available during Phase Two Consultation.
3.6.19	Support for the use of trees/shrubs. Suggestions that these should be native species, wildlife friendly and slow and low growing (near National Grid overhead line).	National Grid		LVRPA*	6	9, 16, 25, 27, 37, 10010	<p>The proposals include a habitat enhancement and creation including open woodland, tree planting and scrub planting along the eastern boundary, as well as marginal planting along Enfield Ditch. The proposals also include meadow planting (species rich mown grass) along the western boundary and tree planting is proposed along Lee Park Way.</p> <p>All trees and the vast majority of shrubs would be native. A small number of ornamental shrubs would be used in locations which require smaller species, for example next to EcoPark House. A schedule of the proposed species will be included in the Design and Access Statement which will form part of the DCO application.</p> <p>All trees and shrubs proposed are wildlife friendly.</p> <p>There is only a small area of the scheme which is located underneath or adjacent to National Grid overhead lines – this is at the junction with Advent Way and Lee Park Way. In this location only slow and low growing ornamental planting is proposed.</p> <p>Further details on landscaping will be available during Phase Two Consultation.</p>
3.6.20	Support for green walls / roofs to mitigate visual impact, increase biodiversity and harvest water harvesting. Brown roof also noted as acceptable.		LBE	LVRPA*	9	16, 19, 27, 39, 43, 47, 48, 10006, 10019	<p>A green roof is proposed above the ERF tipping hall and a brown roof is proposed above the waste bunker. These would mitigate visual impact and increase local biodiversity.</p> <p>It is proposed to have an earth bund incorporating landscaping along the eastern end of the ERF. This bund</p>

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
							softens the effect of the building on the landscaped edge thereby mitigating the visual impact of the ERF from the Lee Valley Regional Park. The earth bund also provides ecological enhancement. Further details on landscaping will be available during Phase Two Consultation.
3.6.21	Support green walls/roof with the caveat that they must be maintained with water used in the process.				1	27	Where possible, rain water would be harvested and used to water the green roof as process water is unlikely to be suitable for this purpose.
<b>Other specific suggestions and comments</b>							
3.6.22	Other suggestions/ queries including: <ul style="list-style-type: none"> <li>• swift nests in the walls;</li> <li>• nature trail;</li> <li>• reduce bulk and massing on east side;</li> <li>• buffer zone to Lee Navigation;</li> <li>• public access to western bank of canal;</li> <li>• restore ditch along Lee Park Way and install coir rolls;</li> <li>• use a natural barrier like Camden Aggregates;</li> <li>• liaise with local food growing projects re edible landscaping;</li> <li>• consult Capel Manor;</li> <li>• include Design Code in the submission;</li> </ul>		LBE	LVRPA*	6	12, 25, 47, 10008, 10009, 10019	<p>The proposals takes significant account of ecology in the local area however swift bricks are not proposed.</p> <p>It is assumed that the suggestion to create a nature trail means within the Lee Valley Regional Park which is located outside the boundary of this Project and as such it is outside the scope of this Project to deliver a nature trail in this location.</p> <p>The ERF has been designed to reduce the overall bulk and massing, particularly on the eastern side of the site. The building would step back from the eastern site boundary. The proposals include a habitat enhancement and creation including open woodland, tree planting and scrub planting along the eastern boundary, as well as marginal planting along Enfield Ditch.</p> <p>Lee Park Way runs along the western side of the Lee Navigation; this route is already open to pedestrians and cyclists. As part of the proposal it is proposed to use Lee Park Way to provide access for light vehicles to the RRF. This route would be upgraded and trees would be planted alongside the road.</p>

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
	<ul style="list-style-type: none"> <li>would detached stack require ancillary structures.</li> </ul>						<p>The proposals include marginal planting along Enfield Ditch as well as opening up the ditch by removing some vegetation. Coir rolls are not suitable due to the low volume of water flows in the ditch.</p> <p>Landscaping proposals to minimise the visual impact of the ERF have been incorporated into the proposal. The landscaping would include a bund partially obscuring the ERF at the northern end of the site and habitat enhancement and creation along the eastern boundary, as well as marginal planting along Enfield Ditch. These measures would screen the ERF and enhance the overall environment.</p> <p>The EcoPark does not include a sufficiently sized landscaped area which can be accessed safely by the public for edible landscaping to be a practical solution.</p> <p>Capel Manor will be consulted during Phase Two Consultation.</p> <p>A Design Code will be included in the Design and Access Statement which will form part of the DCO application.</p> <p>More details on the design of the ERF chimney stack will be available during Phase Two Consultation. It is not anticipated that it will require ancillary structures.</p>



### **Account taken of Phase One landscape, design and appearance comments**

- 3.6.23 A number of comments gave general support for the approach to landscape and design, and these comments are welcomed. Specific comments relate to the external appearance, the stack and landscaping.
- 3.6.24 Comments on the external appearance ranged from a wish for the ERF to be impressive and become a tourist attraction to a wish for it to blend in with the environment, and look better than the current facility. In response scheme has been designed to respond to the surrounding context, and to minimise the visual impact of the building from the Lee Valley Regional Park. The ERF will be a new flagship facility for London and employ high quality design.
- 3.6.25 Comments on the chimney stack were in favour of both an incorporated stack and an independent stack; both two separate flues and a single flue. These comments have been considered during design development and on balance it is considered that the most commonly raised view is that the design should be as least visually intrusive as possible, therefore a single chimney stack incorporating both flues which is the is the least visually intrusive option, has been selected.
- 3.6.26 Comments received during Phase One Consultation acknowledged landscaping to be essential to mitigate any visual and ecological impacts. Specific comments suggested that landscaped corridors should be maintained on the eastern and western boundaries, and that landscaping should enhance the setting of the development. In response the proposals incorporate a green edge along the eastern boundary and high quality waterside areas with tree and scrub planting along the Enfield Ditch and meadow planting along the western boundary. The proposals also include habitat enhancement and creation.
- 3.6.27 Some comments were in support of green and brown roofs whilst others had modified support for green walls because of maintenance issues. In response green and brown roofs have been incorporated into the design, but not green walls.

### 3.7 Cooling System

3.7.1 The main comments raised in respect of the cooling system during Phase One Consultation are set out in Table 10 below.

Table 10: Comments on the cooling system received at Phase One Consultation

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
<b>Cooling system</b>							
<b>Cooling system options</b>							
3.7.2	Agree with NLWA's assessment of the cooling system options.		WCC		5	26, 27, 33, 40, 48	Noted.
3.7.3	Support air cooled condenser because wastes less water and does not have a plume.				4	22, 24, 27, 50	Noted.
3.7.4	Further information requested on noise pollution of air cooled condenser and energy required to run it.				1	6	The operation of air cooled condensers does produce some noise from the operation of fans but they are not loud and are not expected to be audible by those living or working near the site. The operation of the air cooled condensers does not consume a large amount of energy.
3.7.5	Support water cooling system because it is more energy efficient and preferred by residents.				18	5, 16, 18, 19, 26, 33, 36, 38, 39, 40, 42, 46, 47, 10006, 10008, 10009, 10019, 10020	Noted.

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
3.7.6	Support water cooling system with caveat that there has not been sufficient information.				2	27, 31	Noted.
3.7.7	No preference between two options.				1	25	Noted.
<b>Plume</b>							
3.7.8	Concern with a plume from the cooling system including that it is unsightly, harmful to birds, contains pollutants and would travel over resident's house.				3	24, 27, 45	Noted. The plume is water vapour which does not contain pollutants. The plume is not harmful to birds.
3.7.9	No concern. Comments included that it is acceptable/unimportant, residents are used to it and no concern as long as it is not harmful.				10	9, 16, 19, 21, 25, 40, 46, 10006, 10018, 10019	Noted.
<b>Criteria and concerns</b>							
3.7.10	Choose most energy-efficient system.		WCC		17	9, 16, 18, 19, 21, 26, 33, 36, 37, 38, 39, 40, 42, 47, 54, 10008, 10018	Noted.
3.7.11	Choose most cost-efficient system.				3	16, 21, 23	Noted.
3.7.12	Choose system with no odour.				2	16, 23	Noted.

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
3.7.13	Choose system with least impact on residents.				1	5	Noted.
3.7.14	Release only clean, toxin-free vapour.				2	16, 22	With both air and water cooling only toxin-free vapour would be released.
3.7.15	Concern regarding legionella and how it will be prevented.				1	6	Noted.
3.7.16	No concerns.				1	48	Noted.
<b>Other comments/questions on cooling system</b>							
3.7.17	Other questions including: <ul style="list-style-type: none"> <li>• if cooling system impacts on heat output to local network;</li> <li>• if an energy-consuming cooling agent is required;</li> <li>• if steam tubes could be diverted through the earth for cooling instead.</li> </ul>		LBE		1	33	The cooling system will not impact on the level of heat which is anticipated to be required from the LVHN heat network being promoted by LB Enfield. If other district heating schemes come forward in the future, will be capable of supplying these schemes with additional heat.  No energy-consuming agents are required for the cooling system which relies on condensation of water. It is not possible to divert steam through the earth in part because of cost and long term effectiveness of the localised ground to absorb heat.

### Account taken of Phase One cooling system comments

- 3.7.18 The comments received in respect of the proposed cooling system have indicated that some respondents have a preference for air cooling whilst other have a preference for water cooling however there is no clear preference overall.
- 3.7.19 It is considered that further views should be sought in order to inform the decision on which type of cooling process should be progressed. Therefore as part of Phase Two Consultation further views are being sought on this topic.

## 3.8 Traffic and Transport

3.8.1 The main comments raised in respect of traffic and transport during Phase One Consultation are set out in Table 11 below.

Table 11: Comments on Traffic and Transport received at Phase One Consultation

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
3.8.2	Concerns regarding increased traffic during construction and operation, particularly during peak hours. Specific roads mentioned are the North Circular, Fore St, Cook's Ferry Roundabout, Great Cambridge Road, Montagu St and Conduit Way.				11	16, 19, 24, 25, 26, 40, 45, 48, 54, 10016, 10020	A full assessment of the potential effect on traffic during construction and operation for the highway peak hours and for the hours when the site generates the highest traffic flows is being undertaken. This includes the A406 North Circular Road, Fore Street, Cook's Ferry Roundabout, Great Cambridge Road, Montagu St and Conduit Way. The findings of the assessment will be set out in the <i>Transport Assessment</i> to be submitted with the DCO application. An interim draft of the <i>Transport Assessment</i> will be available during Phase Two Consultation. This will include the detailed trip generation and assessment of these trips on the local transport network.
3.8.3	Concern regarding cumulative traffic impact of the proposals in combination with works at the nearby sewage plant and local housing development.				1	24	The <i>Transport Assessment</i> will include an assessment of the cumulative effects of the scheme in combination with other projects. This assessment will include all known local housing and other projects. Works at Deephams Sewage Treatment Works will be completed prior to commencement of construction and therefore will not be included in the cumulative assessment, however it will be included in the future baseline used in the assessment. The findings of the cumulative assessment will be set out in the <i>Transport Assessment</i> to be submitted with the Development Consent Order (DCO) application.

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
3.8.4	Proposals may lead to reduced traffic overall as more waste treated locally.		WC C		1	9	An assessment of the potential transport effects is currently being undertaken. Initial findings indicate that there would be a slight overall increase (less than 10%) in traffic across a 24 hour period when compared with the existing volume of traffic generated at the EcoPark. The findings of the detailed trip generation exercise will be included in the <i>Transport Assessment</i> to be submitted with the DCO application.
3.8.5	Move freight by water or rail to reduce requirements for road transport and associated impacts.	GLA	LBE		6	11, 39, 46, 52, 54, 10016	The use of the River Lee Navigation for transporting waste/materials has been fully explored. However, the overall cost of doing this out-weighs the benefits and as such, this would not form part of the transport strategy for the site. The findings of the water transport study will be included in the <i>Transport Assessment</i> to be submitted with the DCO application.
3.8.6	Travel at night time/outside of peak hours.		LBE		3	5, 21, 10019	During construction, certain activities may be undertaken outside of the peak hours or at night time. As set out in the <i>Interim Code of Construction Practice (CoCP)</i> , this will be agreed with LB Enfield and TfL for each activity where works are required outside of the core working hours. The <i>CoCP</i> will be available during Phase Two Consultation and be submitted with the DCO application.  During operation the site would operate over 24 hours and therefore some trips to/from the site would be undertaken at night-time and outside of peak hours. However, as is currently the case, the majority of waste deliveries would be received between 06:00 and 17:00.
3.8.7	Support for new access points to relieve traffic congestion				2	10006, 10020	Support for the new access points is welcomed and noted.
3.8.8	Other suggestions to mitigate impact of increased traffic including:		LBE		7	5, 16, 24, 36, 37, 48, 54	Construction and operational traffic would use separate entrances so far as is reasonably practical.

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
	<ul style="list-style-type: none"> <li>• separate construction operation entrances;</li> <li>• hubs where fewer but larger vehicles are filled locally;</li> <li>• sensible traffic regulation during all phases;</li> <li>• do not park on the North Circular slip road.</li> </ul>						<p>Waste from some of NLWA boroughs is currently bulked and brought to the site in larger vehicles. This would continue to be the case in the future.</p> <p>The <i>CoCP</i> includes mechanisms for traffic management during construction. During operation, traffic would be managed in a similar manner to the existing site.</p> <p>No parking would be permitted on any A406 North Circular Road slip roads.</p>
3.8.9	Concerns regarding the impact of increased traffic on residents' quality of life.				2	24, 10018	<p>Routes to and from the site would be predominantly away from the residential areas. While the route to and from the northern site access would pass close to the residential area to the north of the Montagu Recreation ground, the small number of additional trips to this entrance during construction and operation is not anticipated to introduce any new significant environmental effects as the area is already characterised by high traffic flows including heavy goods vehicles travelling to the industrial area to the north of the EcoPark on Ardra Road.</p> <p>As part of the <i>Preliminary Environment Information Report (PEIR)</i> the potential effects of the construction and operational traffic have been assessed. The PEIR will be available during Phase Two consultation. A full <i>Transport Assessment</i> and <i>Environmental Statement</i> will also be submitted with the DCO application.</p>
3.8.10	Minimise night time traffic in residential areas.				1	47	<p>As with the current site operation, the majority of waste deliveries would be received between 06:00 and 17:00. The EcoPark would continue to operate over 24 hours meaning that a small number of trips, such as staff trips would be undertaken at night-time and outside of peak hours however these trips would be accessing the site from the A406.</p>

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
3.8.11	Large vehicles should avoid Hall Lane.				1	22	Hall Lane is not one of the primary access routes to the EcoPark. However a small number of trips, predominately from waste collections in the local area, would use this route.
3.8.12	Avoid schools.				1	21	Construction traffic routes would be agreed with LB Enfield and TfL prior to construction and your point is noted.  The routes for operational vehicles travelling to/from the site are expected to remain similar to the existing routes.
3.8.13	Concern regarding impact of large vehicles on road users generally and specifically in terms of safety				2	9, 11	The composition of vehicles visiting the EcoPark would not be significantly altered from that of the existing site. Construction vehicles would be fitted with the most up-to-date safety technology and drivers would be required to undergo safety training. This will be secured through the CoCP which will be available during Phase Two Consultation.
3.8.14	Concerns regarding safety risk to cyclists and pedestrians Suggestion to introduce safety standards/measures such as zebra crossings, vehicles with safety technologies, and vehicle safety standards compliant with London Cycling Campaign's recommendations. Promote measured/responsible driving through driver awareness training and ensuring mobile phones are not used by lorry drivers whilst driving. Provide cycle facilities such as segregated cycle lanes, or segregated pedestrian and cycle lanes along Lee Park Way.			LVRPA*	6	6, 9, 10, 11, 21, 10006	New cycle facilities would be provided along Lee Park Way and a safe crossing point would be provided for cyclists where this intersects with National Cycle Network Route 1. A safe crossing point would also be provided on Lower Hall Lane where the cycle route is intersected by the access to the construction layover area.



Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
3.8.15	Concerns regarding impact of vehicle residue and dirt on pedestrians and motorcyclists.				2	6, 23	Wheel washes would be provided during the construction period to ensure that all vehicles leaving the site are clean and would not contribute to an increase in dirt on the local highway network. This will be included in the <i>CoCP</i> which will be available during Phase Two Consultation.
3.8.16	Liaise with local road planners to ensure safety of all road users.				1	9	LB Enfield and TfL have been consulted throughout the development of proposals and will continue to be engaged.
3.8.17	Concern regarding impact of traffic on National Grid gas pipeline, Lee Navigation Corridor and Lee Park Way.	National Grid		LVRPA*	0		<p>Measures would be put in place to protect the National Grid gas pipeline.</p> <p>The potential traffic impact on Lee Navigation Corridor and Lee Park Way has been assessed and the preliminary findings will be set out in the <i>PEIR</i> which will be available during Phase Two Consultation. The full assessment will be set out in the <i>Transport Assessment</i> to be included in the DCO application.</p> <p>Vehicles would access the eastern side of the EcoPark from along Lee Park Way. This route is currently closed to members of the public and as such there would be an increase in the number of vehicles using this road. However only a 200m stretch of this road would be used and this route would only be used by light vehicles (cars/vans). New pedestrian and cycle facilities would be provided along Lee Park Way to ensure its continued safe operation as a pedestrian and cycle route.</p> <p>The transportation of waste by water is not proposed and as such there is not anticipated to be any significant effect on the Lee Navigation.</p>
3.8.18	Concern regarding potential road damage caused by heavy vehicles.				1	10006	The area is already characterised by a large number of heavy vehicles. The proposals would see a small

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
							increase in the number of vehicles travelling to the site when operational and the main increase in traffic associated with construction would be employee (light) vehicles. The potential effects of heavy vehicles will be assessed in the <i>Transport Assessment</i> to be included in the DCO application.
3.8.19	Safeguard pipeline from construction traffic by using a temporary raft at crossing points and ensuring early liaison with National Grid.	National Grid			0		Measures would be put in place to protect the National Grid gas pipeline.
3.8.20	Improve / maintain existing transport infrastructure including Lee Park Way, the road and bridge over the Lee Navigation Corridor and local access roads around the A406.			LVRPA*	2	5, 10010	New cycle facilities would be provided along Lee Park Way and a safe crossing point would be provided for cyclists where this intersects with National Cycle Network Route 1. A safe crossing point would also be provided on Lower Hall Lane where the cycle route is intersected by the access to the construction layover area.  The visibility and road markings at the junction of Lee Park Way would be improved.
3.8.21	Further studies/detail requested on the following: <ul style="list-style-type: none"> <li>the Construction Logistics Plan to include more information on management of trips, deliveries and parking;</li> <li>more detail on sustainable transport measures;</li> <li>baseline employee trips assessment;</li> <li>ongoing review by TfL.</li> </ul>	GLA	LBE		2	25, 10016	A <i>Code of Construction Practice (CoCP)</i> has been prepared and forms part of the DCO application. The CoCP provides information on how construction trips and deliveries will be managed as well as the provision of parking during construction. The CoCP also includes details the Construction Management Plan that will be prepared prior to commencement of construction.  <i>The Transport Assessment which will be included in the DCO application, will include a Framework Construction Travel Plan and Framework Operation Travel Plan. These sets out details of the sustainable transport measures. The Operational Travel Plan to be</i>

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
							completed prior to the completion and occupation will provide details of the baseline employee assessment. TfL has been consulted regularly throughout the pre-application process. Details of engagement will be set out in the <i>Consultation Report</i> and <i>Transport Assessment</i> to be included in the DCO application.
3.8.22	No concerns/would have minimal impact/proposals are necessary.				5	18, 19, 50, 10008, 10009	Noted
3.8.23	Proposed mitigation measures are sufficient.				3	26, 27, 40	Noted

### Account taken of Phase One traffic and transport comments

- 3.8.24 Comments received during Phase One Consultation indicated that consultees wish to see more information on potential traffic and transport effects. In response an Interim Transport Report, including the outcomes of the transport assessment, is published as part of Phase Two consultation. Requests for information included cumulative impact assessment and information about water transport – this is provided also as part of Phase Two consultation.
- 3.8.25 In response to comments raised on the safety of pedestrians and cyclists' new pedestrian and cycle facilities have been incorporated into the proposals along Lee Park Way and safety procedures will be in place for the driving of the construction vehicles.
- 3.8.26 Consultation comments generally supported additional access points to the site. In response two new access points have been incorporated into the design.

### 3.9 Community Benefits

3.9.1 The main comments raised in respect of community benefits during Phase One Consultation are set out in Table 12 below.

Table 12: Comments on Community Benefits received at Phase One Consultation

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
3.9.2	Concerns regarding impact on residents, including reduced house prices, increased traffic and inconvenience.				9	9, 23, 24, 25, 37, 40, 52, 10018, 10019	<p>The proposed use of the site will be a continuation of the current waste management use. The potential impacts of the proposal at sensitive receptors, such as residential areas, will be considered as part of the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the Development Consent Order (DCO) application. Potential traffic effects both during construction and operation will be detailed in the <i>Transport Assessment</i>. During Phase Two Consultation the emerging findings of the environmental impact assessment will be available in the <i>Preliminary Environmental Information Report (PEIR)</i> and an <i>Interim Draft of the Transport Assessment</i> will be available.</p> <p>The nearest residential street is Badma Close, approximately 600m from the Edmonton EcoPark and 60m from the nearest part of the Application Site boundary, and the Project would see the replacement of an ageing waste treatment with a modern facility.</p>
3.9.3	Concerns regarding impact on leisure and recreation facilities such as Lee Park Way, the Meridian Water development and Pickett's Lock leisure development.			LVRPA*	0		<p>We are aware of the proposals at Meridian Water. The scheme design makes provision for landscaping and habitat creation along the eastern boundary of the site. Together with the removal of the existing aging EfW facility and replacement with a new modern facility is likely to improve the external appearance of the site from Meridian Water and therefore complement this proposal. Details of landscaping and the design of the ERF will be</p>

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
							<p>set out in the <i>Design and Access Statement</i> and <i>application drawings</i> to be included in the DCO application. Further information on landscaping and design will also be available during Phase Two Consultation.</p> <p>The potential impacts of the scheme will be considered as part of the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the DCO application. The Environmental Statement will include an assessment of the cumulative impact of other developments such as Meridian Water. During Phase Two the emerging findings of this assessments will be available in the <i>PEIR</i>.</p> <p>The environment along Lee Park Way would be enhanced through habitat enhancement and creation along the eastern boundary of the EcoPark and marginal planting along Enfield Ditch.</p> <p>The Picketts Lock site is located approximately 1km to the north of the EcoPark, and any significant effects will be set out in the PEIR</p>
3.9.4	No concerns/mitigation measures are sufficient.				4	21, 27, 10006, 10018	Support for the scheme is noted and welcomed.
3.9.5	General support for the visitor centre.				21	5, 9, 16, 18, 19, 21, 23, 25, 26, 27, 31, 37, 44, 48, 50, 52, 10006, 10008, 10009, 10019, 10020	Support for provision of a visitors' centre is noted and welcomed.

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
3.9.6	<p>Suggestions for the facilities at and operation of the visitor centre including:</p> <ul style="list-style-type: none"> <li>• support for community education and involvement;</li> <li>• Support for use as a meeting place;</li> <li>• should be more accessible than current facility;</li> <li>• should be advertised;</li> <li>• should include education facilities and materials on waste management and the ERF, for the benefit of various groups;</li> <li>• should include leisure facilities such as a café, a shop, a train ride and telephone facilities</li> <li>• keeping it clean;</li> <li>• not having a booking requirement.</li> </ul>		LBE	LVRPA*	21	5,6, 9, 18, 19, 21, 22, 25, 27 31, 36, 37, 38, 43, 45, 47, 54, 10006, 10009, 10019,10020	<p>EcoPark House would be a multifunctional building which provides replacement accommodation for the Edmonton Sea Cadets, office accommodation for staff, an area to receive visitors, meeting space and flexible space which can be used for education and community uses.</p> <p>EcoPark house would be located on the eastern side of the EcoPark in an area which would be open to members of the public using the RRC. During Phase Two Consultation details of the proposed access routes will be provided.</p> <p>Detailed comments on the facilities at and operation of EcoPark House are noted and will be taken into consideration in developing our proposals. This will include the potential to include a café. The lack of space on site prohibits providing a train ride on site.</p> <p>EcoPark House would be maintained to be a clean and welcoming facility.</p>
3.9.7	Use of centre as a meeting place is unrealistic.				1	24	EcoPark House would provide meeting space to replace the existing meeting space within the EfW facility. The meeting space would predominantly be used by staff and visitors to the EcoPark, however the space would be designed flexibly with a view to its also being used by the community and other groups.
3.9.8	Visitor centre is unnecessary.				1	47	Provision is proposed for those taking tours of the proposed ERF, which would continue to be provided as they are now of the existing facility.

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
3.9.9	Regular communication and transparency, including visible and accessible information and clear mechanism for dialogue.		WC C		9	6, 9, 14, 16, 24, 25, 37, 39, 54, 10019	We agree that communication and transparency are important. A Community Liaison Group is proposed for the construction phases and we would welcome ongoing engagement with local residents and business with regard to the operation of the facility and the site during operation.
3.9.10	More publicity and/or education in schools to reduce stigma associated with site, particularly regarding the plume.				5	9, 18, 37, 42, 10006	We will consider with the Community Liaison Group how to best manage publicity during operation when there are no specific points at which consultation would take place. We agree that enabling education about waste management, the waste hierarchy and operations at the site would be beneficial. During the development of our proposals and preparation for operations we will consider how to best manage engagement with the public generally and children in particular.
3.9.11	Foster sense of community pride, for example by having a striking building design or sponsoring a local Friends of NLHPP group.		WC C		2	31, 10019	As the weight of opinion appears to be in favour of making the building less obvious within its setting we are approaching the question of community pride both in the ERF and operation through sensitive design and landscaping to enhance the overall standing of the site and the facility within the area.
3.9.12	General community engagement and involvement, for example through closer liaison with community sector organisations.		WC C		2	9, 10020	During consultation we have made contact with a number of community groups and as part of Phase Two Consultation we will directly contact more groups. On an on-going basis it is for community groups to contact us if they want information or input but we will continue to have regular liaison with LB Enfield about provision of information to the community.  There will also be a Community Liaison Group during construction.

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
3.9.13	Support for EcoPark tours.				4	9, 16, 39, 47	Currently site tours are offered and the proposal is that tours would continue when the ERF is operational. Support for these is noted and welcomed.
3.9.14	Improve surrounding areas such as Lee Valley Park, nearby retail park and an area used by fly-tippers.				3	22, 23, 25	This area is outside the EcoPark boundary and as such beyond the scope of this Project. Proposals do include the enhancement of the eastern boundary of the EcoPark through habitat enhancement and creation and marginal planting along Enfield Ditch. This would improve the visual impact of the EcoPark from the Lee Valley Park.
3.9.15	Provide leisure facilities in addition to those suggested as part of the visitor centre.				1	23	The EcoPark will continue to be an operational waste management site. The site does not include any areas which would be suitable for leisure facilities.
3.9.16	Use the generated heat and/or electricity to supply local buildings and businesses.				3	18, 33, 45	The scheme is designed to deliver both heat and electricity. NLWA is working closely with the promoters of the Lee Valley Heat Network (LVHN) to develop proposals for the heat from the ERF to be used as part of the heat network. The LVHN would provide heat to local buildings and businesses.
3.9.17	Create job opportunities both during the construction and operation stages, e.g. building apprenticeships or part time-jobs for young people.				4	31, 39, 52, 10019	There would be increased job opportunities during construction and on-going jobs opportunities during operation. Apprenticeships would be considered for construction and work and for future operations.
3.9.18	Accommodate the Edmonton Sea Cadets who are currently based on the EcoPark site.			LWL LVRPA*	0		The Edmonton Sea Cadets would continue to be accommodated at the site in EcoPark House which would include suitable replacement facility for this group designed to take their use into account.



**Account taken of Phase One community benefit comments**

- 3.9.19 Generally, those responding to Phase One Consultation welcomed the suggested visitors' centre and proposals for tours of the site. There was a wish expressed for education facilities. There were no clear suggestions for other benefits.
- 3.9.20 EcoPark House has been designed to provide accommodation for the Edmonton Sea Cadets to remain on site, office accommodation, office and meeting space, and flexible space which can be used for education and community uses. The use of the area for educational purposes has been developed in response to comments raised during Phase One Consultation.
- 3.9.21 There were a number of comments regarding the need for communication and transparency which the applicant fully agrees with. In response a Community Liaison Group is proposed for the construction period, and opportunities to engage with local residents, businesses and community groups will continue to be sought.

### 3.10 Views on the consultation process

3.10.1 The main comments raised in respect of the Phase One Consultation process are set out in Table 13 below.

Table 13: Comments on the consultation process received at Phase One Consultation

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
3.10.2	Support for the consultation process. Comments include that it is open, accountable, has with various feedback mechanisms and sufficient information.			LVRPA *	7	16, 27, 37, 43, 44, 10019, 10024	Noted and welcomed.
3.10.3	Support with the caveat that information should focus on elements with scope for influence.				1	40	Noted and welcomed.
3.10.4	Challenge the consultation process including that there is no/limited opportunity to influence proposals and that a second phase of consultation is unnecessary.				7	18, 22, 24, 37, 42, 10028, 10031*	The consultation process has been undertaken accordance with clear guidelines for consultation on Development Consent Order (DCO) applications. Our proposed approach to consultation was set out in our <i>Statement of Community Consultation</i> . Comments can be received on any aspect of the scheme and will be taken into consideration as part of the design development. The DCO process requires us to report how consultation responses have been taken into account and this will be set out in the <i>Consultation Report</i> submitted with the DCO application. A summary of the comments received during Phase One Consultation will also be published prior to the commencement of Phase Two Consultation.
3.10.5	Suggestion to add a few extra days to the consultation period.				1	10006	The minimum period for consultation on DCO applications is 28 days. Both Phase One and the planned Phase Two Consultation periods exceed this.
3.10.6	Suggestion to use simple feedback mechanisms e.g.				1	19	We used 'open' questions rather than multiple choice in order to allow respondents to say as much or as little as

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
	multiple-choice questions and quick and comprehensive online mechanisms.						they wanted in response to each question. Respondents did not have to respond to every question. We also accepted emailed responses. We will be making it clearer in Phase Two that all responses are welcome – short and long.
3.10.7	Suggestion to extend consultation to other groups / consult all those affected, including wider area and children and young people.				4	11, 22, 31, 45	Phase One Consultation was undertaken in accordance with our published Statement of Community Consultation and was open to all. It was advertised in all seven north London boroughs and widely in the 1.5km vicinity zone, (i.e. 1.5km from the perimeter of the EcoPark site) through adverts, newsletters, leaflets to libraries and some schools. Community groups were identified by Enfield Council and additional community groups will be contacted as part of Phase Two Consultation.
3.10.8	Suggestion to seek / listen to the public opinion, including format and content of information.		WC C		3	23, 25, 10020	Noted and welcomed.
3.10.9	Requests to be further involved in consultation/ assessments.	Nation al Grid, NE, GLA, TWUL*	HBC	LVRPA *	2	10002, 10006	The respondent's identification code will be checked to ensure they are on our email reminder list.
3.10.10	Support for the consultation events. States that exhibition materials were straightforward, easy to understand and high quality				2	47, 10019	Noted and welcomed.
3.10.11	Challenge that there were not enough exhibitions and not many locations covered.				1	22	Noted. Exhibition venues were identified from a range of sources including suggestions by Enfield Council. All selected venues had to comply with all health and safety and accessibility requirements and had to be available

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
							when required. A shortlist of potential venues was visited to identify the most suitable. We propose to use a mobile information vehicle as part of our Phase Two communications to reach additional locations. This will not be a substitute for exhibitions but will provide additional opportunities to raise awareness about the consultation.
3.10.12	Suggestion to include display board describing how Phase One feedback will be used in determining next steps.				1	10019	Noted. A summary of the comments received during Phase One Consultation will also be published prior to the commencement of Phase Two Consultation.
3.10.13	Satisfied with the level/ quality/ accessibility of info provided in consultation booklet, leaflets and website. Consultation feedback form easy to use.	GLA	WC C		24	5, 6, 9, 16, 18, 19, 21, 22, 26, 27, 39, 40, 43, 45, 47, 48, 50, 54, 10006, 10008, 10009, 10018, 10019, 10020	Noted and welcomed.
3.10.14	More information needed on climate change/emissions/ alternatives considered. States that there are blank appendices in Outline Business Case. States that information on the website/consultation document is circular/repetitive.		LBE	LVRPA *	9	23, 24, 25, 36, 38, 42, 10006, 10019, 10028	An <i>Alternatives Assessment</i> report, detailing NLWA's decisions which have led to a proposal an ERF at the Edmonton EcoPark will be available at Phase Two Consultation. NLWA is carrying out assessments based on the WRATE methodology, an Environment Agency tool for assessing the environmental impact of proposed developments or facilities. The assessment will consider the impacts of the proposed ERF, which will include carbon impact assessments. A draft of the

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
							WRATE assessment will be available at Phase Two Consultation.
3.10.15	Information should be tailored/ focused/easy to understand. Suggest that a summary of Phase One Consultation comments and how they have been addressed is provided. Suggestion that all questions received during consultation should be published. Suggestion to include indicative costs info and provide a 3D view of site during construction and final design.	GLA	WC C		10	8, 16, 21, 38, 40, 42, 54, 10019, 10028	<p>The <i>Consultation Report</i> which will form part of the DCO application will set out how comments received during consultation have been taken into account in the design. A summary of the comments received during Phase One Consultation and responses will also be published prior to the commencement of Phase Two Consultation.</p> <p>Indicative costs for the replacement ERF were included in the Frequently Asked Questions provided in Phase One Consultation. The preliminary costings for the replacement ERF show a cost of £450 million to £500 million. Further cost information will be available prior to the DCO application but will remain subject to detailed design after the Development Consent Order (DCO) application has been determined.</p> <p>All questions asked during Phase One Consultation are being considered and information, where available and appropriate, will be provided as part of Phase Two Consultation.</p> <p>Phase Two Consultation will include new videos covering the site layout and the design of the ERF.</p>
3.10.16	One respondent notes a mistake in the consultation materials.				1	10016	The Phase One Consultation materials stated: "In north London only 32% of the waste from households in the area is reused, recycled or composted. This leaves 78% that must be disposed in some way." 78% should have been recorded as 68%. This will be corrected in Phase Two Consultation materials.
3.10.17	Information requested on the cost of waste management, cost of the district system to local residents and financial assessment of the operating model and potential use				4	23, 45, 54, 10021	Indicative costs for the wider scheme will be provided in Phase Two Consultation; however, detailed implications of the cost to the north London Boroughs will be

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
	of profits from generated electricity.						calculated in conjunction with preparation for procurement of the ERF.
3.10.18	Information requested on the heating network including use of pressurised heated steam for community heating systems.				3	23, 45, 10021	The Lee Valley Heat Network (LVHN) is being brought forward by Enfield Council. NLWA is working closely with the promoters of the LVHN to develop proposals for the heat from the ERF to be used as part of the heat network. Please see the following website for more information on the LVHN: <a href="http://www.leevalleyheatnetwork.co.uk">www.leevalleyheatnetwork.co.uk</a>
3.10.19	Request for information on where generated electricity will be used.				2	42, 45	Electricity generated by the scheme would be used on the EcoPark site and distributed to National Grid.
3.10.20	Request for information on the timeline for construction including the sequence of events and relationship timeline of waste hierarchy commitments.		LBE		2	33, 45	Further information will be available during Phase Two Consultation.
3.10.21	Request for information on how green walls will be maintained.				5	17, 23, 24, 25, 10021	Green walls were given as an example of possible treatments for external appearance during Phase One Consultation but are not proposed. Further information on the reasons for this can be found in the Landscape and Design theme table.
3.10.22	Request for information on how dust / litter will be minimised during delivery / disposal.				1	10006	Operational arrangements to ameliorate dust and litter are already in place. These measures would continue to be used in future operations.
3.10.23	Request for information on air quality including: <ul style="list-style-type: none"> <li>• measures to prevent / reduce air pollution;</li> <li>• the health impact of air pollutants;</li> </ul>				7	6, 24, 27, 29, 39, 42, 45	The impact of the proposed development on air quality will be considered within the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the DCO application. During Phase Two the emerging findings of this assessment will be available in the <i>Preliminary Environmental Information Report (PEIR)</i> .

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
	<ul style="list-style-type: none"> <li>any bulk chemicals to be stored on the site;</li> <li>the treatment of residue ashes;</li> <li>emissions during start-up/ shut-down of combustion units;</li> <li>the water scrubbing system.</li> </ul>						
3.10.24	Request for information on design including plans for enhancement of retained open spaces.		LBE		1	10008	The proposals include landscaping to create a high quality environment that maximises ecological enhancement and sustainable water management. The landscaping design also seeks to integrate the site into the wider landscape character to minimise visual impact. Further details on landscaping will be available during Phase Two Consultation.
3.10.25	Request for information on environmental impacts including effects of waste pollution on the nearby river and noise levels caused by the air cooled condensers, and impact on natural habitats.				7	6, 23, 24, 25, 39, 45, 50	The impact of the proposed development on noise and water resources will be considered within the environmental impact assessment which will be reported in the Environmental Statement which forms part of the DCO application. During Phase Two the emerging findings of this assessment will be available in the <i>Preliminary Environmental Information Report (PEIR)</i> . The <i>Code of Construction Practice</i> for the scheme will include measures regarding the management of noise during construction.
3.10.26	Request for information on the cooling system including percentage of energy produced needed to run the air cooled condensers, how water cooled condensers would be treated, need for an energy-consuming cooling agent system, maintenance cost for water		LBE		3	6, 33, 54	This information will be available during Phase Two Consultation.

Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
	cooling system due to limescale, impact on the heat output of the Lee Valley Heat Network and provision of water pumping station.						
3.10.27	Request for information on the location of the new access points.		LBE		1	25	This information will be included during Phase Two Consultation.
3.10.28	Request for more information on NLWA governance and funding arrangements.				1	10019	This information is available in the Finance and Resources section (8) of NLWA's Annual Report available on NLWA's website <a href="http://www.nlwa.gov.uk/docs/26-6-14/3-nlwa-2013-14-annual-report.pdf">http://www.nlwa.gov.uk/docs/26-6-14/3-nlwa-2013-14-annual-report.pdf</a>
3.10.29	Request for more information on community benefits including local job opportunities and skills required, meeting point at the visitor centre, community benefits for managing extra waste, financial benefit to Boroughs of generated energy and offsite works and construction laydown areas.		LBE		5	25, 39, 54, 10006, 10021	There would be increased job opportunities during construction and on-going jobs opportunities during operation. Apprenticeships would be considered at all points for construction and work and for future operations.  EcoPark House would be a multifunctional building which provides replacement accommodation for the Edmonton Sea Cadets, office accommodation for staff, an area to receive visitors, meeting space and flexible space which can be used for education and community uses.
3.10.30	Request for more information on traffic and transport including steps taken to minimise impacts on road users, the relocation of vehicle depot and details of lorry routes.		LBE		6	6, 11, 42, 45, 52, 54	As part of the <i>Preliminary Environment Information Report (PEIR)</i> the potential effects of the construction and operational traffic have been assessed. The PEIR will be available during Phase Two consultation. A full <i>Transport Assessment</i> and <i>Environmental Statement</i> will also be submitted with the DCO application.
3.10.31	Request for more information on recycling targets including whether 50% recycling target is a		LBE		1	10021	Recycling is a key priority for NLWA and its host seven boroughs which are working towards achieving 50%



Ref	Issue	SC	LA	LO	CC	CC Respondent IDs	Response
	priority for NLWA, how other waste streams will be treated, further information on the RRF and ash recycling.						household recycling by 2020. The proposed ERF has been sized for 50% recycling. Further information on how other waste streams will be treated, the RRF and ash recycling will be available at Phase Two Consultation.
3.10.32	Request for more information on waste forecasting including the basis for the correlation between increased spending and waste generation, Eunomia's waste data report and Waste Forecast Model and NLWA's response to it				2	10021, 10024	The waste forecasting is based on estimates of residual waste which will be collected by the north London boroughs over the years to 2051, allowing for a 50% recycling rate for household waste. The methodology is clearly set out in the <i>Need Case</i> document, which will be available at Phase Two Consultation, and based on a range of data and compiled by nationally recognised external advisers. In considering the forecasts various scenarios were considered.
3.10.33	Request for more information on other strategies including coordination with current waste strategy of North London authorities.				2	38, 10021	The North London Waste Plan is a separate process, and is a land use Plan, agreed by the seven boroughs in their capacity as local planning authorities. It is understood, through liaison with the NLWP process, in which NLWA is a key stakeholder, that the NLWP data studies will take into account the forecasting carried out for this Project. The NLWP is due for consultation in the summer of 2015, and the EcoPark, as a protected waste management site, is expected to be listed in that plan. . The scheme proposed is consistent with the Joint Waste Strategy of NLWA and seven north London Boroughs.

**Account taken of Phase One Consultation process comments**

- 3.10.34 A number of respondents supported for the process and considered it to be open and accountable. Challenges were that there was no or limited opportunity to influence, and that Phase Two consultation was not necessary.
- 3.10.35 Comments on the events included support, with the view that the exhibition materials were of high quality and easy to understand; and challenge that there were insufficient exhibitions and not enough locations. In response Phase Two consultation includes new videos covering the site layout and the design of the ERF. Also a mobile information vehicle is being used as part of Phase Two consultation to reach additional locations. Chingford was specifically noted by one respondent as an area which should be consulted, this area is therefore covered during Phase Two consultation.
- 3.10.36 Comments on the amount of information supplied were divided between those satisfied with the level of information and those who wanted more. Specific information was sought on climate change, emissions, electricity and heat use, the timeline and alternatives considered. In response this information is provided as part of Phase Two consultation.